

Norwich to Tilbury DCO

784-B067253

Thurrock Council - Local Impact Report

Prepared on Behalf of Thurrock Council

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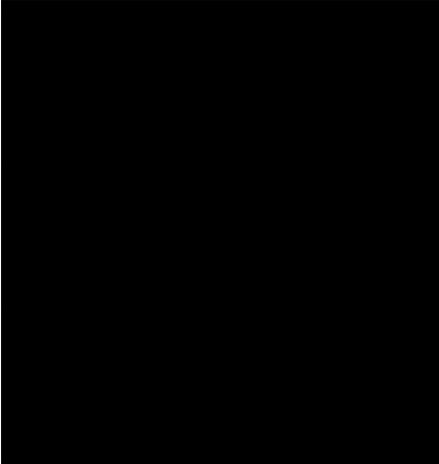
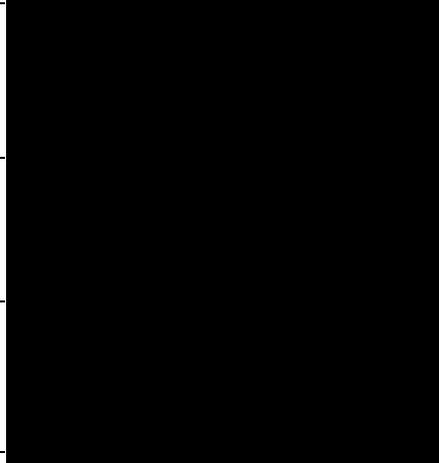
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1.0 1.0 Glossary of Acronyms

Air Quality Management Area	AQMA
Abnormal Indivisible Loads	AIL
Affected Road Network	ARN
Area of Outstanding Natural Beauty	AONB
Air Insulated Switchgear	AIS
Biodiversity Net Gain	BNG
Code of Construction Practice	COCP
Construction Traffic Management Plan	CTMP
Cable Sealing End	CSE
Contractor Baseline	CIT
Critical National Priority	CNP
Development Consent Order	DCO
Draft Development Consent Order	Draft DCO
Department for Transport	DfT
Environment Agency	EA
East Anglia Connection Node	EACN
Environmental Impact Assessment	EIA
Examining Authority	ExA
Environmental Statement	ES
Environmental Assessment of Traffic and Movement	EATM
Essex County Council	ECC
Electro Magnetic Field	EMF
Flood Risk Assessment	FRA
Greenhouse Gas	GHG
Gas Insulated Switchgear	GIS
Heavy Goods Vehicle	HGV
Household Waste and Recycling Centre	HWRC
Institute of Environmental Management and Assessment	IEMA
Institute of Air Quality Management	IAQM
Joint Specific Needs Assessment	JSNA
Kilometres	KM
Kilovolt	KV
Landscape and Visual Impact Assessment	LVIA

Landscape and Ecology Management Plan	LEMP
Limits of Deviation	LoD
Local Impact Report	LIR
Less than Substantial Harm	LTSH
Lowest Observed Adverse Effect Level	LOAEL
Local Lead Flood Authority	LLFA
Lower Thames Crossing	LTC
Municipal Solid Waste	MSW
Ministry of Housing Communities and Local Government	MHCLG
National Planning Policy Framework	NPPF
National Grid Electricity Transmission Network (the Network)	NGETN
National Grid Electricity Transmission (the Applicant)	NGET
National Cycle Network	NCN
Nationally Significant Infrastructure Project	NSIP
National Policy Statement	NPS
Non-Designated Heritage Assets	NDHAs
Non-Road Mobile Machinery	NRMM
No Observed Effect Level	NOEL
Noise Policy Statement for England	NPSE
Outline Code of Construction Practice	OCoCP
Outline Landscape and Ecology Management Plan	OLEMP
Overhead Line	OHL
Primary Access Route(s)	PAR
Public Rights of Way	PRoW
Planning Inspectorate	the Inspectorate
Preliminary Environmental Information Report	PEIR
Recreation & Leisure Management Plan	RLMP
Refuse Collection Vehicle	RCV
Relevant Representations	RR
Secretary of State	SoS
Site Access Points	SAP
Significant Observed Adverse Effect Level	SOAEL
Sustainable Urban Drainage System	SuDS
Site Waste Management Plan	SWMP
Thurrock Council	The Council

Transport Assessment	TA
Traffic Management Measures	TM
Traffic Regulation Order	TRO
Temporary Traffic Regulation Order	TTRO

Purpose of this Submission

The document has been prepared by Thurrock Council to provide a Local Impact Report (“LIR”) detailing the policy context, assessment of impacts, and required mitigation and/or compensation. The assessment of impacts has been separated by service area.

2.0 Overview

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- 2.1 Thurrock Council ("the Council") is a statutory consultee for the Nationally Significant Infrastructure Projects ("NSIP"). Internal discipline Officers have scrutinised the proposals submitted by National Grid Electricity Transmission ("NGET") (the "Applicant") and have spoken with local communities, local Councillors and interested parties.
 - 2.2 This Local Impact Report ("LIR") has been prepared in accordance with s60(3) of the Planning Act 2008 (as amended) (the "2008 Act") having regard to the guidance in the Planning Inspectorate's guidance 'Nationally Significant Infrastructure Projects: Advice for Local Authorities', and the Ministry of Housing, Communities and Local Government ("MHCLG") guidance 'Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects'.
 - 2.3 The Council has considerable experience of the NSIP regime, and this LIR has been prepared by a wide group of officers from the Council with a wealth of experience in their respective technical areas.
 - 2.4 It is important for the Council to clearly set out its concerns to the Examining Authority ("ExA") at this stage, in order to highlight changes and improvements to the proposals that could be made before the ExA makes its recommendations to the Secretary of State ("SoS").
 - 2.5 The Council recognises that, whilst the development of infrastructure proposal is supported in principle, there are still concerns raised within the submitted proposals which need to be addressed. The Council's formal position is that of opposition to the application unless the technical issues identified within the submitted RR submission are addressed and satisfied.

3.0 Terms of Reference

Introduction

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- 3.1 Norwich to Tilbury Development Consent Order application ("the Application") is a proposal by NGET ("the Applicant") to reinforce the high voltage power network in East Anglia between the existing substations at Norwich Main in Norfolk, Bramford in Suffolk, and Tilbury in Essex, as well as connecting new offshore wind generation (the "Project"). It is proposed to build approximately 184 km of new electricity transmission reinforcement between Norwich and Tilbury, made up mostly of overhead line and pylons, along with some underground cables and a new 400 kV substation.
- 3.2 Based upon the identified impacts set out in this LIR, the Council proposes a number of alterations to the Norwich to Tilbury Development Consent Order ("DCO") submitted by the Applicant, including the DCO requirements at Schedule 3 of the draft DCO [APP-056]. The Council has submitted its comments on the DCO to the ExA which, for ease of reference, are also appended to this LIR included at Appendix A in a tabulated format.

Scope

- 3.3 This LIR relates to the impacts of the Project as they affect the administrative area of the Council. The Project is broken down into seven sections, the Council's area being identified as Section H.
- 3.4 The report specifically describes the impact of the works as described in full in Schedule 1 of the Norwich to Tilbury Development Consent Order ("DCO"), namely:
- A new 400 kV electricity transmission connection of approximately 180 km overall length from Norwich Main Substation via Bramford Substation, a new East Anglia Connection Node ("EACN") Substation and a new Tilbury North Substation, into Tilbury Substation comprising:
 - Approximately 159 km of new overhead line supported on approximately 509 pylons, either standard steel lattice pylons (approximately 50 m² in height) or low height steel lattice pylons (approximately 40 m in height) and some of which are gantries (typically up to 15 m in height) within proposed Cable Sealing End ("CSE") compounds or existing or proposed substations
 - Approximately 22 km of 400 kV underground cabling (some of which is located through the Dedham Vale National Landscape (an Area of Outstanding Natural Beauty ("AONB"))
 - Seven new CSE compounds (each with a 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 Tilbury North (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 Network ("NGETN") overhead lines to facilitate the connection to the existing network into the new Tilbury North Substation including:
 - Existing ZB circuits to be diverted and changed to underground cable to allow for YYJ circuits to be connected into the new Tilbury North Substation.
 - Temporary works associated with the construction of the Project.
- 3.5 In addition, third party utilities diversions and/or modifications will also be required to facilitate the construction of the Project. There will also be land required for environmental mitigation and Biodiversity Net Gain ("BNG").
- 3.6 As well as the permanent features, land will also be required temporarily for construction activities including working areas for construction equipment/machinery, offices, welfare, storage and temporary construction access.
- 3.7 Since the original document was published NGET have revised the scheme within the Thurrock area (Section H) as set out in paragraphs 2.7 to 2.11 below.
- 3.8 Rather than connecting at the existing Tilbury Substation, NGET are now proposing a new Tilbury North Substation 5km to the north, close to Orsett and between the villages of Linford and Chadwell St Mary. The Tilbury Substation will be located where NGET had previously proposed to build a CSE compound.
- 3.9 The Project will connect into the national electricity transmission system through the new substation and a modification of the existing overhead line (known as YYJ). The YYJ line already connects to the existing Tilbury Substation.
- 3.10 NGET will also need to underground a section of a second existing overhead line (known as ZB) to avoid crossing with the new lines coming out of the substation.
- 3.11 The proposed change removes the need to construct approximately 4.5 km of underground cabling and NGET will no longer need to extend the existing Tilbury Substation.
- 3.12 The change was proposed in response to feedback about the potential interactions with a number of existing and proposed developments in the area, including potential impact on economic growth opportunities at the Freeport and challenging construction sections to cross under existing infrastructure.
- 3.13 This LIR does not describe the Works in details, relying on the Applicant's descriptions as set out in the DCO Application documents.

Purpose and Structure of the LIR

- 3.14 S60(3) of the 2008 Act defines Local Impact Reports as:

"A "local impact report" is a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)."

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- 3.15 The Planning Inspectorate ("the Inspectorate") provides advice pages that are intended to inform Local Authorities in relation to the Planning Act 2008, in terms of Local Impact Reports:

"The report should give details of the likely impact of a project on the local authority's area. Sections 104(2)(b) and 105(2)(a) of the Planning Act explains that the Examining Authority and the Secretary of State must have regard to any LIR submitted when deciding the application. Therefore, local authorities should not underestimate the importance of the report.

The report should cover any topic the local authority consider is relevant to the impact of the project on their area and the local communities affected...

The purpose of the LIR is to make the Examining Authority aware of the potential impacts of the project based on local knowledge. It is a technical evidence-based assessment of all the impacts. The LIR is therefore not the document where the local authority should set out its objections or support for the application (see relevant representations)."

The Inspectorate's advice also states: - *"The content of the LIR is a matter for the local authority. The Examining Authority will be assisted by the submission of a LIR that clearly sets out and evaluates the impacts in a structured manner ..."*

<https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-for-local-authorities> - Advice for Local Authorities NSIPs)

- 3.16 This LIR has been prepared by the Council to provide a detailed response to all topic areas and matters of the likely impacts of the Project under topic-based headings, to reflect the likely perceived impacts of the Project. The LIR identifies key issues for the Council under each area of topic identified within the report, providing commentary on the extent to which the Applicant has sufficiently addressed these issues by reference to relevant policy, and the application documentation as relevant. Where the Council considers that key issues have not (as yet) been adequately addressed, the likely impacts, as identified in the LIR, do provide the basis for the Council's objections (as matters stand) to the proposals. Whilst the Council is mindful of the purposes of the LIR, as set out above, the Council also considers that it would be undue and unnecessary repetition in setting out the same matters as objections in a separate written representation. To overcome the Council's objections the Applicant is urged to address the key issues and the Council respectfully invites the ExA to encourage the Applicant to do so. The Council has also set out its initial observations and objections in its Relevant Representation [RR-3665].
- 2.17 Where the Applicant has sought to address these concerns, these will be referenced to the application documentation, including the DCO articles, requirements, and obligations where relevant.

4.0 Description of the NSIP and Area with Reference to the Proposed Development

The Project - Norwich to Tilbury

- 4.1 The Project comprises reinforcement of the transmission network between the existing Norwich Main Substation in Norfolk and Tilbury Substation in Essex, via Bramford Substation, the new EACN Substation and the new Tilbury North Substation.
- 4.2 The reinforcement is needed because the existing transmission network, even with current upgrading, will not have sufficient capacity for the new renewable energy (a substantial proportion of which would be generated by offshore wind) that is expected to connect to the network over the next 10 years and beyond. Completion of the Project, together with other new reinforcements across the country, will meet this future energy transmission demand both in East Anglia and across the UK.
- 4.3 The scope of the project is detailed in paragraph 2.3 above.

Thurrock Council Area - Section H of the Project

- 4.4 The Project within the administrative boundary of the Council, known as Section H of the Project, travels in a southerly direction from the boundary with Section G (Basildon Borough Council, Brentwood Borough Council, and part of Chelmsford City Council) through arable fields, with Langdon Ridge SSSI adjacent to the east, before crossing the River Mardyke and then Doesgate Lane. It then continues south through arable fields and some areas of woodland, passing to the west of Horndon on the Hill, before crossing the A13 Stanford-le-Hope Bypass and the A1013 Stanford Road. The Project continues south where it connects into the new Tilbury North Substation adjacent to Orsett Golf Club and Rainbow Wood Ancient Woodland (located within the Order Limits). The Order Limits continue to the west and south of the new Tilbury North Substation to allow for modifications to the existing ZB and YYJ infrastructure, including two CSE compounds south of the proposed Lower Thames Crossing ("LTC") project. Ashen Wood Ancient Woodland is also within the Order Limits.
- 4.5 The principal features located within Section H (Thurrock) include Langdon Ridge SSSI; River Mardyke; the A13; the A1013; Rainbow Wood Ancient Woodland; and the LTC project.
- 4.6 The principal project infrastructure within Section H (Thurrock) will include pylons and overhead line, the new Tilbury North Substation and CSE compounds.

2.0 5.0 Policy Context

Legislative Context

- 5.1 The following regulations and acts are up to date at the time of writing this LIR.

Planning Act 2008

- 5.2 The Project is defined as a NSIP under Section 14(1)(b) and Section 16 of the 2008 Act, as amended by the Planning Act 2008 (NSIP) (Electric Lines) Order 2013, as it involves the installation of an electric line above ground of more than 2km which would operate at 400 kilovolts (kV) in England.
- 5.3 For an NSIP, the grant of development consent is required by the making of a DCO as specified within Part 3 of 2008 Act.
- 5.4 The proposed new above ground electricity line will be an NSIP by virtue of the definitions of the 2008 Act. Other development, such as underground cables and cable sealing end compounds, may be granted development consent as associated development within the meaning of s115 of the 2008 Act.
- 5.5 Section 104(2)(a) of the 2008 Act states at (2)(a) that, in deciding the application, the SoS must have regard to any National Policy Statement ("NPS") which has effect in relation to development of the description to which the application relates.
- 5.6 The 2008 Act was amended through the adoption of the Localism Act in 2011. Under the Localism Act 2011, the Inspectorate is responsible for the NSIP planning process.

Electricity Act 1989

- 5.7 S9(2) of the Electricity Act 1989 (the "1989 Act") places general duties on NGET as a licence holder 'to develop and maintain an efficient, co-ordinated and economical system of electricity transmission...'. In addition, s38 and Schedule 9 of the 1989 Act require NGET, when formulating proposals for new lines and other works, to: '*...have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and shall do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects*'.

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

- 5.8 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the "EIA Regulations") govern the EIA process relevant to NSIPs. Schedule 1 of the EIA Regulations lists those projects for which an EIA is required and includes, under paragraph 20, the construction of overhead electrical power lines with a voltage of 220 kV or more and a length of more than 15 km.
- 5.9 The Project includes the proposed installation of 400 kV electricity transmission infrastructure over approximately 180 km, of which approximately 159 km is overhead line and as such the EIA Regulations apply.

Countryside and Rights of Way Act 2000 as amended by the Levelling-Up and Regeneration Act 2023 (the "2023 Act")

- 5.10 AONBs are designated for their outstanding natural beauty. They are designated under Section 82 of the 2023 Act to secure their permanent protection against development that would damage their special qualities. In November 2023, AONBs were renamed National Landscapes.

The Conservation of Habitats and Species Regulations 2017 ("Regulations 2017")

- 5.11 Under the Regulations 2017 there is a requirement to undertake a screening exercise to determine whether there will be likely significant effects on European sites or species because of the Project, either alone or in combination with other plans and projects. If likely significant effects cannot be ruled out, an Appropriate Assessment as required under Regulation 63 of the Regulations 2017 must be carried out by the competent authority, in this case, the SoS for Energy Security and Net Zero. The applicant must provide a report with the application showing the site(s) that may be affected together with sufficient information to allow the Appropriate Assessment to take place.

Environmental Act 2021

- 5.12 The Environmental Act 2021 provides a framework for improving environmental management across a wide spectrum of environmental issues including waste and resources, water quality, biodiversity, and air quality. It aims to deliver long-term targets to improve environmental conditions and reduce pollution.
- 5.13 Section 99 and Schedule 15 of the Environment Act 2021 (the "2021 Act") amend the Town and Country Planning Act 1990 by introducing a new Schedule 2A. Schedule 2A outlines the biodiversity gain objectives and conditions for development, ensuring that the biodiversity value of the onsite habitat exceeds the pre-development value with the aim of enhancing biodiversity conservation in development projects.

Natural Environment and Rural Communities (NERC) Act 2006 (the "2006 Act")

- 5.14 The 2006 Act established Natural England by merging English Nature, the Rural Development Service and the Countryside Agency.
- 5.15 It aims to promote the conservation of biodiversity, landscapes, and the natural environment while also supporting the sustainability of rural communities. The 2006 Act emphasises the importance of protecting and enhancing biodiversity, promoting access to the countryside, and supporting the sustainable management of natural resources.

Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (the "WFD Regulations")

- 5.16 The WFD Regulations impose duties on the SoS and the Environment Agency ("EA") to carry out certain assessments, when deciding whether to grant, vary or revoke certain permits and licences which affect water quality.

National Policy Context

National Policy Statements

- 5.17 NPSs are produced by the Government through a parliamentary approval process and present the planning policy framework for all decision making for NSIPs. NPSs also include the Government's objectives for the development of NSIPs and are produced for different types of infrastructure development.

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- 5.18 In deciding an application for development consent, s104 of the 2008 Act requires the SoS to determine the application in accordance with any relevant NPSs. The following NPSs which came into force on 6 January 2026 are relevant to the Project:
- 5.19 NPS (EN-1) is the Overarching NPS for Energy and was published in November 2023 and updated in December 2025. This sets out the UK Government's commitment to increasing renewable generation capacity and recognises that in the short to medium term, much of the new capacity is likely to come from onshore and offshore wind.
- 5.20 NPS (EN-3) is the UK Government's strategy for renewable energy infrastructure.
- 5.21 NPS (EN-5) is the UK Government's strategy for electricity networks infrastructure. This policy statement applies to not only transmission systems but also associated infrastructure such as substations and converter stations. This policy statement sets out the general principles that should be applied in the assessment of development consent application across the range of energy technologies.

National Planning Policy Framework

- 5.22 Paragraph 5 of the 2024 NPPF states:
- 'The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework).'*
- 5.23 While the NPSs remain the prime decision-making documents, regard must also be had to any other matters of importance and relevance, which may include relevant policies in the NPPF.

Holford Rules

- 5.24 Guidelines on overhead line routeing were first formulated in 1959 by Sir William, later Lord, Holford, as advisor to the Central Electricity Generating Board. Holford developed a series of planning guidelines in relation to amenity issues, that have subsequently become known as the 'Holford Rules' (National Grid, n.d.) and remain a valuable tool in selecting and assessing potential overhead line route options as part of the options appraisal process. These have been an important consideration during the development of the Project and whether certain sections should be considered for undergrounding.
- 5.25 The Holford Rules are also expressly considered as part of NPS EN-5. The principles of the Holford Rules are being applied to the Project.

Horlock Rules

- 5.26 NGET devised the Horlock Rules in 2003, and these were subsequently updated in 2006 (National Grid, 2006). The Horlock Rules provide guidelines for the siting and design of new substations, or substation extensions, to avoid or reduce the environmental effects of such developments. In summary, like the Holford Rules, they facilitate consideration of environmental and amenity considerations within the design and siting of new substation infrastructure.

Powering up Britain

- 5.27 The Powering Up Britain document sets out how the Government will enhance our country's energy security, seize the economic opportunities of the transition, and deliver on our net zero commitments.

A Green Future: Our 25 Year Plan to Improve the Environment

- 5.28 The "A Green Future: Our 25 Year Plan to Improve the Environment" document is the Government's high level environmental strategy which includes targets in a number of relevant areas.

The UK's Modern Industrial Strategy 2025

- 5.29 The aim of the UK's Industrial Strategy is a 10-year plan to increase business investment and grow the industries of the future in the UK. The Strategy will make it quicker and easier for business to invest and will provide the certainty and stability needed for long-term investment decisions.
- 5.30 The UK's Industrial Strategy includes the 'Offshore Wind sector that will increase decarbonisation and clean growth.

Community Benefits Consultation

- 5.31 The Government consulted on a recommended approach to community benefits for electricity transmission network infrastructure in 2023. The Government's response, published in November 2023, stated that voluntary guidance on community wide benefits and information on developing a mandatory policy approach would be published in 2024. A working paper seeking further views on community benefits and shared ownership of low carbon energy infrastructure was then published in May 2025.

Local Policy Context

Development Plan

- 5.32 The current adopted Development Plan is the Thurrock Local Development Framework, Core Strategies and Policies for Management of Development (adopted 2015) and the Thurrock Borough Local Plan 1997 Saved Policies (adopted 1997).
- 5.33 The Thurrock Borough Local Plan is currently under review. The Council is preparing for the adoption of a new local plan by Spring 2028. The local development scheme identifies the following timetable for adoption of the new plan:

Scoping	Completed
Issues and Options (Stage 1)	Completed
Issues and Options (Stage 2)	Completed
Local Plan: Initial Proposals Consultation (Regulation 18)	Completed
Local Plan: Publication Draft Consultation (Regulation 19)	Spring 2026 (Circa January-March 2026)
Submission to SoS for examination in public (Regulation 22)	Summer 2026 (Circa July-September 2026)

Commencement of Examination hearings	Spring 2027 (Circa January-March 2027)
Inspector's report expected	Autumn 2027 (Circa September-November 2027)
Adoption of the Local Plan by Council	Spring 2028 (Circa January-March 2028)

- 5.34 Consideration of how the proposals interact with the adopted Thurrock Borough Local Plan are provided within the issue-based chapters below in regard to the development proposals pursuant of the project.

3.0 6.0 Impacts by Issue

6.1 Highways and Transport

Summary

- 6.1.1 The traffic and transport assessment for the Norwich to Tilbury DCO identifies that the most significant local impacts would arise during the construction phase within Thurrock, primarily due to increased construction traffic and HGV movements along nine identified Primary Access Routes (PARs), six of which were assessed as requiring further consideration under IEMA criteria.
- 6.1.2 The assessment identifies significant adverse effects on certain links in relation to driver delay, public transport delay, pedestrian, cyclist and horse-rider amenity, and fear and intimidation, with some links also experiencing moderate to large significant effects, while impacts on severance, parking and loading, and journey delay for non-motorised users are generally assessed as slight or not significant. No positive construction impacts are identified.
- 6.1.3 Concerns remain regarding the robustness of the assessment, including limited primary traffic data, uncertainty around future baseline traffic forecasts, unresolved vehicle routing (including Abnormal

Indivisible Loads), and highway design and mitigation measures that have not yet been agreed by Thurrock Council following Stage 1 Road Safety Audits. Traffic and transport effects during the operational and decommissioning phases have been scoped out in accordance with the EIA Scoping Opinion and are therefore not expected to give rise to significant impacts. Overall, while the submitted transport documentation broadly aligns with national and local policy objectives, further data collection, validation, design development and agreement of mitigation measures are required to confirm policy compliance and ensure that construction-related traffic and transport impacts are appropriately managed.

National Policy Statements

- 6.1.4 At a national level, the following policy documents (and parts thereof) are relevant to the consideration of the impact on the significance of traffic and transport impacts arising from the development scheme:
- Overarching National Policy Statement (NPS) for Energy (EN-1) (National Policy Statement EN-1) (Department for Energy Security and Net Zero (DESNZ), 2024a) is the key overarching policy relevant to the Project.
 - This is supported by National Policy Statement for Electricity Networks Infrastructure (EN-5) (National Policy Statement EN-5) (DESNZ, 2024b).
- 6.1.5 (NPS) for Energy (EN-1): Paragraphs 5.14.1 and 5.14.4 relate to the requirement for the transport of material, goods and personnel from a development *‘during all phases of construction’ to be assessed for potential impacts on the transport networks. Additionally, in line with wider Government objectives for energy infrastructure to ‘include contributing to sustainable development’.*
- 6.1.6 Paragraph 5.14.6 states that *‘National Highways and Highways Authorities are statutory consultees on NSIP [Nationally Significant Infrastructure Projects] applications including energy infrastructure where it is expected to affect the strategic road network and/or have an impact on the local road network. Applicants should consult with National Highways and Highways Authorities as appropriate on the assessment and mitigation to inform the application to be submitted’.*
- 6.1.7 Paragraphs 5.14.11 – 5.14.15, 5.14.18 – 5.14.19 and 5.14.21 set out detail of demand management and required levels of mitigation of impacts which should be considered and assessed.
- 6.1.8 NPS EN-5 (DESNZ, 2024b): Paragraph 2.5.1 sets out the planning and evaluation requirements of the development scheme in terms of contribution to environmental and biodiversity net gain. The policy details the opportunities of linear electricity infrastructure to connect and enhance biodiversity and connect sustainable transport networks.
- 6.1.9 The applicant has submitted supporting transport documents setting out the development scheme, undertaking assessments of the impacts and proposing mitigation measures. These transport documents support the assessments used within the Environmental Statement (ES) (Document: 6.16 Chapter 16 Traffic and Transport) which have been submitted in support of the Development Control Order (DCO) application. These submissions are in line with those expected for the DCO application. Therefore, the applicant has demonstrated policy compliance in submission of the appropriate

documents which would contain the appropriate assessment and information as would be required to satisfy (NPS) for Energy (EN-1) for the application. 6.1.10 Full consideration of the relevant NPSs for the Project and this chapter can be found in the Policy Compliance Document (document reference 5.7).

6.1.10 The Definitive Map and Statement for Public Rights of Way (PROW) is a legal record which identifies the definitive rights of way in Thurrock. As the surveying authority the Council are responsible for keeping these records under continuous review. Responsibility also includes looking after the surface of the PROW and to comment on any application for any permanent or temporary changes to these routes.

National Policy/Guidance

6.1.11 The following guidance is relevant to the consideration of traffic and transport impacts of the development scheme:

- Transport Act 2000.
- Highways Act 1980.
- National Planning Policy Framework (NPPF) 2024 (Ministry of Housing, Communities and Local Government, 2025) and accompanying planning practice guidance.
- The Definitive Map and Statement for Public Rights of Way (PROW) in England and Wales are governed by the Wildlife and Countryside Act 1981
- Road Traffic Regulation Act 1984 (for temporary closure)

Local Policy Context - Thurrock Council Core Strategy Local Plan

6.1.12 Reference is made to the following Council transport policy document:

- Thurrock Transport Strategy 2013-2026 (Thurrock Council, 2022).

6.1.13 No reference is made to the following emerging Thurrock Council transport policy documents:

- Emerging Thurrock Transport Strategy 2026-2040 (to be adopted mid-2026).
- Thurrock Local Transport Plan Vision 2050 (adopted February 2023).

6.1.14 Clarification should be sought to determine if agreement has been reached with the Council to confirm whether there is a requirement for the development scheme to be reviewed against these emerging transport policy documents.

6.1.15 In the absence of the inclusion of a policy review of the development scheme against these policy documents, the Applicant has not demonstrated policy compliance with these local emerging policy documents.

6.1.16 Policy Summary: It is acknowledged that the supporting transport assessments (including those in the ES Chapter 16 Traffic and Transport), and the impact and mitigation assessment aim to comply with the objectives of the overarching national, regional and local transport policy. However, on review of the submitted information, including those which may support and influence the ES Chapter 16 Traffic and Transport, concerns remain with respect to the following which may impact on the robustness of the assessments undertaken to determine impact and necessary, or required mitigation:

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1. Data gathering (as detailed in the supporting Transport Assessment (TA) and ES) – Limited surveys/primary data collection has been undertaken on the Thurrock Road network (ES Figure 16.4: one ped count and one traffic count on A128, one junction count at site access 85, four PROW survey sites on pedestrian route). Existing models used in assessment should be validated against primary data.
 2. Key Parameters and Assumptions – ES paragraph 16.4.32 reiterates 2023 traffic flows were gathered via Department for Transport (DfT) static traffic counters and used to establish future baseline (start of construction activities from 2027). Re-iterating, absence of primary source data for robust assessment of future baseline traffic flows.
 3. Data gathering: ES paragraph 16.5.4 states that, for links where DfT traffic flows were not available, traffic flows were collected by the Project Team in 2023, November 2024 and May 2025. ES Appendix 16.1 - Engagement Undertaken Relevant to Traffic and Transport (Transport Working Group Regional Meeting (Thurrock), September 2023) confirms that 2019 DfT data was used and supplemented by November 2023 traffic count surveys, plus additional traffic surveys were undertaken near to 'several' DfT count sites. Further traffic counts were undertaken in November 2024. While the commentary implies primary traffic data sourcing, the number and location of the additional traffic count data is unclear.
 4. Vehicle Routeing: the Council have requested further validation that the Primary Access Routes (PAR) selected to confirm these acceptable in terms of highways design and capacity assessments.
 5. Abnormal Indivisible Loads (AIL): Route options are yet to be agreed by the Council and other relevant stakeholders, and further investigations (including structural investigations) are required to validate the selected route, complete impacts assessment and determine appropriate mitigation.
 6. Highway Design: A series of highways mitigation designs have been prepared for site access points, crossovers and bellmouths which have been audited via a Stage 1 Road safety Audit. The Council have requested additional information to address safety and design concerns identified in the audit process. TC have detailed in the audit process concerns with these designs/highways' mitigation measures progressing to detailed design stage. As a result, the Council have not been able to accept these designs in principle at Stage 1 Road Safety Audit stage.
 7. Highway Mitigation Design: All and any highway mitigation measures requiring works in the public highway will require detailed design approval. Further design works are considered appropriate (as per point 6)
 8. Traffic Management Measures (TM) – TM measures will need to be agreed with TC. To enable review, detailed TM plans and will need to be submitted to TC to provide sufficient detail to that submitted at this preliminary stage.

6.1.17 It is therefore concluded that whilst the supporting traffic and transport documents aim to meet objectives of the relevant national, regional and local transport policy, further information, detail justification and design works in relation to data collection and traffic forecasting, vehicle routeing and assessment and impacts, highways designs and mitigation are required to confirm robust assessments have been undertaken and therefore policy compliant.

Construction Phase Impacts

- 6.1.18 A total of nine Primary Access Routes (PARs) are identified on the Thurrock road network. Based on the Institute of Environmental Management and Assessment (IEMA) Rule 1 and Rule 2 criteria for determining further environmental assessment of roads relevant to traffic and Heavy Goods Vehicle (HGV) increases, the PAR links on the Thurrock road network were assessed as to requiring or not requiring additional assessment (ES Appendix 16.4 Traffic and Transport Construction Effects, Section 16, Table A16.4.1).
- 6.1.19 The assessment is based on the peak year of construction activity, i.e. the worst case for any single location which is considered reasonable and robust. This assessment includes those committed developments likely to overlap with the development scheme peak year of construction which could generate additional traffic along the PARs.
- 6.1.20 Increases in traffic levels were assessed based on the IEMA Rule 1 and Rule 2 Criteria. Of the nine routes PARs reviewed, six were considered to require assessment.
- 6.1.21 ES Appendix 16.4 - Traffic and Transport Construction Effects provides the detail of the traffic and transport significance of effect for environmental impacts on the below:
- Driver delay and public transport delay to passengers.
 - Pedestrian, cyclist and horse-rider delay.
 - Pedestrian, cyclist and horse-rider severance.
 - Pedestrian, cyclist and horse-rider amenity.
 - Fear and intimidation (Pedestrian, Cyclists and Horse riders).
 - Collisions and road safety.
 - Parking and loading.
- 6.1.22 The Outline CTMP makes limited reference to local bus services. While the assessment identifies moderate to large significant effects in relation to public transport delay on a number of Primary Access Routes during the construction phase, further consideration is required in respect of the implications for local bus services and the adequacy of the mitigation proposed through the CTMP.
- 6.1.23 A summary of the impact assessment for the road links forming part of the PARs is presented in ES Appendix 16.4 Traffic and Transport Construction Effects, Table A16.4.8.
- 6.1.24 It is noted that comments within the assessment of magnitude of impact for some links may have been adjusted where: (i) notably low future baseline and HGV flows, which provide misleadingly high the percentage change of general traffic and HGV traffic; or (ii) or where time or duration assessment criteria have not been met. Where these judgements have been made and documented within the ES, this approach is considered to be reasonable.
- 6.1.25 Document 7.6 Outlined PRow Management Plan show that 18 PRow are impacted in Thurrock. 11 PRow will be managed on existing alignment; 7 PRow will be temporarily diverted. Hoford Road bridleway mitigation is unclear as a model was used from another area, rather than inspecting or measuring the actual site.

Positive Impacts

- 6.1.26 No positive impacts reported within ES 'Appendix 16.4 Traffic and Transport Construction Effect's.

Neutral Impacts

- 6.1.27 Pedestrian, cyclist and horse-rider delay (magnitude of impact – journey length increases of more than 500m - major, 250m to 500m - moderate, 50m to 250m - minor and under 50m - negligible): Significance of Effect (Significance) PRow – 2 no. Neutral (Not Significant).
- 6.1.28 Parking and Loading (assessed for those road links forming the PARs where the proposals are to suspend any formal or informal parking spaces - magnitude of impact defined as loss of parking of four weeks in any 12-month period): Significance of Effect (Significance) Links – 5 no. Neutral (Not Significant).
- 6.1.29 Within paragraph 4.2.2 of Document 7.6 'Outline PRow Management Plan', the Applicant sets out its aims to minimise disruption whilst ensuring public safety. Table 8.3, within section 8.7 of Document 7.6, shows what works are needed and the projected lengths of disruption to PRow. Although 18 PRow's are impacted, no permanent closures or diversions are required. It is noted that a further or final management plan is to be agreed.

Negative impacts

- 6.1.30 Driver delay and public transport delay to passengers: (magnitude of impact – changes in total traffic or HGV flows of 30%, 60% and 90% are considered minor, moderate and major). Changes to bus services/bus stops or taxi facilities for over four weeks in any 12-month period. Significance of Effect (Significance) Links – 2 no. Slight (Not Significant), 3 no. Moderate (Significant), 1 no. Large (Significant).
- 6.1.31 Pedestrian, cyclist and horse-rider delay: (magnitude of impact – journey length increases of more than 500m - major, 250m to 500m - moderate, 50m to 250m - minor and under 50m - negligible): Significance of Effect (Significance) PRow – 5 no. Slight (Not Significant).
- 6.1.32 Pedestrian, cyclist and horse-rider severance: (magnitude of effect – changes in total traffic flows of 30% Minor, 60% moderate and 90% major): Significance of Effect (Significance) Links – 6 no. links Slight (Not Significant).
- 6.1.33 Pedestrian, cyclist and horse-rider amenity: (magnitude of impact – changes in total traffic of over 100% or where there is an increase of HGV flows of 30% minor, 60% moderate and 90% major): Significance of Effect (Significance) Links – 4 no. Slight (Not Significant), 2 no. Moderate (Significant).
- 6.1.34 Fear and intimidation (pedestrian, Cyclists and Horse riders): (magnitude of impact – fear and intimidation occur through a combination of traffic flow, speed, HGV composition and its proximity to people or lack of protection): Significance of Effect (Significance) Links – 4 no. Slight (Not Significant), 2 no. Large (Significant).

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- 6.1.35 Parking and Loading: (assessed for those road links forming the PARs where there are proposals to suspend any formal or informal parking spaces - magnitude of impact defined as loss of parking of four weeks in any 12-month period): Significance of Effect (Significance) Links – 1 no. Moderate (Slight).
- 6.1.36 Collisions and Road Safety: Collisions and safety are assessed using personal injury collision data obtained from online DfT Road Collision Data. The IEMA Guidelines: Environmental Assessment of Traffic and Movement (EATM) (2023) recommend that professional judgement is needed to assess the effects. The following criteria have been used to assess the effects:
- Where junctions have had 10 or more collisions in a three-year period.
- 6.1.37 Where links have recorded 10 or more collisions per 100m lengths in a three-year period. 5.1.38 No formal assessment of Collisions and Road Safety is presented in ES Appendix 16.4 Traffic and Transport Construction Effects. ES Chapter 16 - Traffic and Transport, Road Safety, paragraph 16.7.44 states that the overall residual effects on road user safety from the construction phase would be temporary, short-term, and the level of effect slight adverse and therefore Not Significant.
- 5.1.38 Volume 7.6 outlined PRow Management (outline Management Plan chapters 5 & 6) and states that walkers will have to wait until tasks can be paused before the public can continue along the route and in installation and removal of the haul road it could be a couple of hours before the public can continue. The diversions which are mostly on farm tracks, on higher ground and surfaced will be across cropped fields, given a temporary surface according to usage (to be discussed). All the signs, fencing, the haul road and construction site will affect the enjoyment of the PRow. 18 no. Moderate

Operational Phase Impacts

- 6.1.39 The effects of the Project for Traffic and Transport during operation (and maintenance) have been scoped out of the assessment in accordance with the EIA Scoping Opinion (Document: 6.20 'Scoping Opinion').
- 6.1.40 This proposed development is through agricultural land within which is where PRow are situated. The PRow which are along the alignment of the development will be impacted during all phases of the development proposals pursuant to the Project.

Decommissioning Phase Impacts

- 6.1.41 The effects of the Project for Traffic and Transport during Decommissioning have not been assessed but have been scoped out of the assessment in accordance with the EIA Scoping Opinion (Document: 6.20 'Scoping Opinion').
- 6.1.42 All phases of the development including decommissioning will impact the PRow, not only for the taking away of the haul roads but due to the reinstatement of the surface of the PRow. The detail concerning the reinstatement can be found in the Outline PRow Management Plan (Document reference 7.6 Chapter 6).

Other - Draft Development Consent Order (DCO)

Order Limits and Limits of Deviation:

- 6.1.43 The Order Limits are defined as the maximum extent of land within which the Project, as defined within the ES (Volume 6 of the DCO application), may be carried out, and includes both permanent and temporary land required to build and operate (and maintain) the Project.
- 6.1.44 The Limits of Deviation ("LoD") represent the maximum deviation for permanent features, such as the overhead line, pylons, CSE compounds, new substations and underground cables. This allows for adjustment to the final positioning of Project features to avoid localised constraints or unknown or unforeseeable issues that may arise.
- 6.1.45 The ES details the results of sensitivity testing to determine if delays or an extension to the construction programme, changes to the design within the LoD or if any of the design scenarios presented in Document: 6.4 ES 'Chapter 4 - Project Description', would affect the assessment.
- 6.1.46 Document: 6.16 ES 'Chapter 16 – Environment Statement' Paragraph 16.9.4 – Flexibility within the LoD states that there would be no new or different likely significant effects resulting from infrastructure being placed at different locations with the LoD. This conclusion is based on there being no additional receptors or significant changes to construction traffic movements associated with the scenarios. Access to the Project would likely use the proposed SAP and PARs currently assessed within the ES (Volume 6 of the DCO application) or may require haul road adjustments and SAP relocations. However, this would not result in any change to predicted significant effects.
- 6.1.47 The commentary is noted that the Project would 'likely' use the proposed and tested SAPs and PARs. This statement implies potential for alteration or changes to the tested SAPs and PARs. Due consideration would need to be given to any such alterations or changes, with appropriate re-testing and mitigation provided as may be necessary to be undertaken by the Applicant and re-submitted for review by the Council and any relevant stakeholders.
- 6.1.48 Paragraph 16.9.5 – Flexibility of Order Limits states that 16 locations where alternative designs have been identified with Document: 6.4 Project Description, six of which are located within Thurrock, these being:
1. Tilbury North Access at the proposed new Tilbury North Substation (temporary access to Tilbury North Substation via Brentwood Road and permanent access running east to west between Brook Farm and Orsett Golf Club)
 2. Thurrock Airfield and Low Heights west of Langdon Hills Golf and Country Club (increase the height of pylons between TB238 and TB243 to the standard lattice pylon height instead of low height pylons, should Thurrock Airfield no longer be in use)
 3. Temporary construction compounds (relocation of a temporary construction compound to the immediate west of Lower Dunton Road, east of TB233)
 4. South of the proposed new Tilbury North Substation (widened LoD around the underground cable, existing and proposed new locations of YYJ and ZB pylons and the two Cable Sealing End (CSE))

compounds to allow for potential design refinements due to uncertainties regarding other projects (including Lower Thames Crossing, housing developments and aggregate facilities)

- 6.1.49 The assessments of the above all state 'there would be no change to the significance of effects predicted in this chapter as the number of construction vehicles and access arrangements are unlikely to change' or 'there would be no change to the significance of effects predicted in this chapter'.
- 6.1.50 It is noted that numbers of forecasts of the number of construction vehicles and access arrangements are deemed as being 'unlikely' to change. This statement implies potential for change; therefore, due consideration would need to be given to any such changes, with appropriate re-testing and mitigation provided as may be necessary undertaken by the Applicant and re-submitted for review by the Council and any relevant stakeholders.
- 6.1.51 The assessment of the LoD variations concludes there would be no additional receptors or significant changes to construction traffic movements associated with the scenarios, therefore the impacts of the development scheme and the significance of the impacts are stated as not likely to alter because of any changes to infrastructure within the Order Limits or LoD.

Required Mitigation

- 6.1.52 General: Mitigation must be appropriate to impact. As detailed in the Policy Context Section herein, data selection for forecasting purposes which links to impacts assessment has been raised, specifically the lack of primary source traffic data. The Applicant should provide confirmation and / or further evidence to ensure the validity of the data used and the robustness of the assessments undertaken.
- 6.1.53 Additional mitigation has been defined for A1013 Stanford Road/Buckingham Hill Road junction. The proposed mitigation is Signal Optimisation as set out in Document: 7.11 TA.
- 6.1.54 Pedestrian, Cyclist and Horse-Rider Severance and Amenity: Safety concerns have been noted at Link PAR 65 - Buckingham Hill Road; Link PAR 66 - Brentwood Road; Link PAR 67 - A1013 Stanford Road (west of Orsett Cock Roundabout); and Link PAR 68 - Heath Road. The proposed mitigation is stated as 'Driver information pack' provision, identifying potential hazard locations where pedestrians and, or cyclists may be crossing the carriageways, on designated crossing points, on verges, crossing the carriageway, moving to/ the National Cycle Network ("NCN"). Specific mitigation detail is identified within Document: 7.3 'Outline Construction Traffic Management Plan' ("CTMP").
- 6.1.55 All and any mitigation measures proposed should be in accordance with and appropriate to the impacts or highways and safety concerns raised by the Council.
- 6.1.56 External to this ES assessment it is noted that some mitigation measures within the Outline CTMP relating to highway modifications for construction vehicles (including AILs), as reviewed, are yet to be agreed by the Council at the preliminary design stage (Stage 1 Road Safety Audit) due to lack of design detail and lack of response to key highways design and safety issues. As such, these highways designs and construction vehicle mitigation measures are yet to be agreed.
- 6.1.57 All mitigation measures proposed within the TA, Outline CTMP, and ES, both physical and best practice, should be agreed by the Council and any other stakeholders ahead of any works commencing.

6.1.58 All mitigation processes as laid down in Document: 7.6 PRow Management Plan is to be adhered to.

Cumulative Impacts

6.1.59 This section provides the opportunity to highlight any potential cumulative impacts that may be considered relevant.

6.1.60 ES 'Chapter 17 - Cumulative Effects' details the two categories of cumulative effects, these being: Intra-project cumulative effects; and Inter-project cumulative effects. Intra-project cumulative effects are those caused by the development scheme; and Inter-project cumulative effects are the combined (or cumulative) effects or impacts of the other approved or committed development schemes, plus the development scheme.

6.1.61 **Intra-project:** ES Table 17.3 Likely residual intra-project cumulative effects – Pedestrians, cyclists and horse riders using footpaths, bridleways, cycle routes and minor roads within Project, Section H (Thurrock), residual effects on the following receptors during the construction period are anticipated to be temporary and short term were identified:

- Severance:
 - **Minor adverse:** Link PAR 63 - A128 Brentwood Road; Link PAR 64 - A1013 Stanford Road (east of Orsett Roundabout); Link PAR 65 - Buckingham Hill Road; Link PAR 67 - A1013 Stanford Road (west of Orsett Roundabout); and Link PAR 68 - Heath Road.
- Amenity:
 - **Major adverse:** Link PAR 65 - Buckingham Hill Road.
 - **Moderate adverse:** Link PAR 64 - A1013 Stanford Road (east of Orsett Roundabout); Link PAR 66 - Brentwood Road; Link PAR 67 - A1013 Stanford Road (west of Orsett Roundabout); and Link PAR 68 – Heath Road.
 - **Minor:** Link PAR 63 - A128 Brentwood Road.
- Fear and intimidation:
 - **Major adverse:** Link PAR 67 - A1013 Stanford Road (west of Orsett Roundabout)
 - **Minor adverse:** Link PAR 63 - A128 Brentwood Road; Link PAR 64 - A1013 Stanford Road (east of Orsett Roundabout); Link PAR 65 - Buckingham Hill Road; and Link PAR 68 - Heath Road.

6.1.62 **Inter-project:** Likely residual Inter-project cumulative effects are inherent within the assessment undertaken for the supporting TA (Document: 7.11) and Outline CTMP (Document: 7.3) which support the assessments undertaken in ES 'Chapter 16, Document: 6.16 Traffic and Transport'. It is acknowledged that the technical and non-technical assessments within the aforementioned submitted supporting traffic and transport documents have identified impacts and have proposed mitigation scaled and appropriate to the Project's impacts.

6.1.63 All mitigation measures proposed within the TA, Outline CTMP, and ES, both physical and best practice should be agreed by the Council and any other stakeholders ahead of any works commencing.

Comments on Supporting Documents

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- 6.1.64 This section comments on supporting application documents relevant to this discipline, with the purpose of illustrating where considered improvements to the assessments and mitigation measures should be made to address the concerns raised in the preceding sections.
- 6.1.65 On review of the TA, Outline CTMP and ES Chapter 16, the following items are considered to be key to enable robust assessment of the impacts of the development scheme, and therefore scaled and appropriate proposed mitigation, or more directly, key to enable construction vehicle movements on the local road network within Thurrock. Additionally, where specific mitigation is proposed, clarifications and confirmation will need to be provided by the Applicant ahead of any agreements in principle or sign off.
- 6.1.66 The Council and the applicant are to reach an agreement in respect of the approach for further assessments, information provided or design development to be undertaken by the applicant and the resultant outputs provided to the Council and any other relevant stakeholders for review for the following:
1. Data gathering – non-primary source data and forecasting.
 2. Assessment of impacts based on forecasting (see point 1).
 3. Mitigation based on impacts of forecast (see point 2).
 4. Policy compliance (see points 1, 2 and 3).
 5. Pre and Post Construction Surveys: Justification of approach and scope of all and any pre and post construction surveys will need to be agreed with the Council, and as appropriate updates included within an updated detailed CTMP. This extends to all works completed on or impacting the public highway.
 6. TM Measures (including Traffic Regulation Orders ("TRO") / Temporary Traffic Regulation Orders ("TTRO")): All TM measures will need to be agreed by the Council and the detail included within an updated Outline CTMP. No movement of construction vehicles or works are to be undertaken until full and final agreements/ permissions are in place. Detailed TM plans and will need to be submitted to the Council to provide sufficient detail to that submitted at this preliminary stage.
 7. PARs: The Council would like to see further validation that the routes selected are acceptable in terms of highways design and capacity assessments through submission of detailed technical assessments
 8. AIL Routeing: AIL route options have been determined and are detailed within the Outline CTMP. It is noted that discussions with statutory stakeholders are ongoing on the majority of route options, and in some instances further information is required, therefore routes for the various AIL load routes are yet to be fully assessed and finalised.
 9. AIL Structural Investigations: Discussions with statutory stakeholders are ongoing on the majority of route options, and in some instances further information is required. Therefore, routes for the various AIL load routes are yet to be fully assessed and finalised.
 10. AIL Assessment of impact: It is noted that the AIL routeing strategy is subject to agreement (see point 8) and change on finalisation of construction programme. A full assessment would need to be undertaken of the impacts of the AIL movements in terms of capacity and potential mitigation requirements to determine the full impacts on the highway.
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11. Highways Design (Site Access, Crossover and Bellmouth Designs): Through the Stage 1 Road Safety Audit process the preliminary site access, crossovers bellmouth layouts have been reviewed. The audits identified a number of design and safety issues raising concerns at the majority of the submitted designs which have not been addressed in or during the audit process. The Council have not been able to sign the designs off at Stage 1 Road Safety Audit. Further work to preliminary designs audited is required to assure the Council that the sites have been properly considered (e.g. designs have been prepared on OS mapping with no regard to frontage constraints / critical features). It is therefore expected that the Applicant will undertake further design development in some cases on topographical survey information and in others on OS mapping supplemented with critical constraining features at the Detailed Design stage. Additionally, where further information may be required, this will be provided as appropriate to inform the detailed designs. These designs will be submitted to the Council for review prior to their submission for Stage 2 Road Safety Audit.
 12. Highway Mitigation Design: A review of the Indicative Highways Mitigation Plans for Section H (Thurrock) identifies a series of proposed mitigation measures. All and any highway mitigation measures requiring works in the public highway will require detailed design approval. As per point 11 above, no submitted designs have approved Stage 1 Road Safety Audit status.
 13. TM: All TM will need to be agreed with the Council. To enable review, detailed TM plans will need to be submitted to the Council to provide sufficient detail to that submitted at this preliminary stage. All TM measures will need to be agreed prior to any works being commenced.

6.2 Landscape

Summary

- 6.2.1 In Thurrock, landscape and visual impacts occur the most during construction and early operation, with limited scope for full mitigation due to the scale and height of the proposed infrastructure. Minor benefits arise from the revised siting of the Tilbury North Substation, which improves visual containment, and from the generally open agricultural character of the route where vegetation removal is limited and embedded mitigation can reduce short-term effects. However, construction activities give rise to significant adverse effects on nearby residents and PRowS where works occur in close proximity.
- 6.2.2 During operation, although the route avoids highly sensitive landscapes and follows an existing transmission corridor for much of its length, the introduction of new pylons results in noticeable and, in places, significant changes to landscape character and views, particularly in areas closest to the route and around settlements. Visual effects diminish with distance but remain significant for receptors in close proximity, especially users of PRowS. While planting and landscaping will provide some long-term screening, the effectiveness of mitigation is constrained, meaning residual significant landscape and visual effects remain in parts of Thurrock.
- 6.2.3 Overall, while landscape mitigation measures, including replacement planting and substation landscaping, would reduce effects over time, the scale and height of the infrastructure means that

residual significant landscape and visual impacts remain in parts of Thurrock, reinforcing the importance of robust siting and early delivery of mitigation.

National Policy Statements

6.2.4 At a national level, the following policy statements (and parts thereof) are particularly relevant to the consideration of the impact on the significance of Landscape and Visual impacts arising from the development scheme:

- Department for Energy Security & Net Zero, Overarching NPS for Energy (EN-1) (December 2025). This provides guidance on assessing and mitigating landscape and visual impacts of energy infrastructure projects. Paragraphs 5.9.1–5.9.17 set out the need to consider landscape character, visual amenity, and the potential effects of infrastructure, including temporary construction works.
- Department for Energy Security & Net Zero, Overarching NPS for Energy (EN-5) (December 2025). Highlights the potential for significant visual effects due to pylons, cable routes, and associated infrastructure. It also encourages careful routeing, design, and mitigation to reduce landscape and visual impacts, including the retention of vegetation, use of screening, and appropriate siting of compounds and access tracks.

National Policy/Guidance

6.2.5 N/A.

National Planning Policy Framework

6.2.6 Paragraphs 187 and 188 of the NPPF are relevant to these proposals.

“187. Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

188. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework⁶⁵; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries”.

Thurrock Core Strategy Local Plan

6.2.7 The following policies from the Thurrock Core Strategy and Policies for Management of Development (as amended) January 2015 are relevant to these proposals:

- CSTP22 – Thurrock Design.

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- CSTP23 – Thurrock Character and Distinctiveness.
 - PMD2 – Design and Layout (in part).

Local Impact Assessment

Construction Phase

Positive Impacts

- 6.2.8 The changes to the siting of the Tilbury North Substation have some landscape and visual benefits as it will move the substation into an area that is more visually contained.

Neutral Impacts

- 6.2.9 The route through Thurrock is predominantly contained within arable farmland. Construction will have limited effects on existing vegetation with few trees or hedges requiring removal. The embedded mitigation measures should help reduce the extent of any impacts during construction.

Negative Impacts

- 6.2.10 There will be significant adverse effects on users of PRowS close to the proposed route and on nearby residents within settlements and individual properties along the route.

Operational Phase

Positive Impacts

- 6.2.11 N/A

Neutral Impacts

- 6.2.12 The route runs through mainly rural locations however it avoids landscape features of high sensitivity. There are existing lines of pylons along much of the length. There are limited public viewpoints close to the route. This means that visual effects will be limited along much of the route.

Negative Impacts

- 6.2.13 The development scheme is predicted to result in significant effects on landscape character during operation in LCA J1 Langdon Lower Hill Slopes (major within 0.5km), LCA H1 East and West Tilbury Open Undulating Farmland major within 0.5km and moderate between 0.5km & 1.5km. Moderate and significant adverse effects will be experienced in LCA A1 Bulphan Fenland and HCA H2 Orsett and Horndon on the Hill Open Undulating Fenland.
- 6.2.14 The development scheme is predicted to result in significant adverse effects on most settlements along the route (major for Bulphan, Horndon on the Hill, Orsett, Southfields and Linford and moderate for Stanford-li-Hope and Grays and Chadwell St Mary).
- 6.2.15 Where there are PRowS within 400m of the proposed pylons, the effects on users will be major and significant. The effects on users of PRowS more than 400m from the site will not be significant.

Decommissioning Phase

Positive Impacts

6.2.16 N/A

Neutral Impacts

6.2.17 N/A

Negative Impacts

6.2.18 N/A

Required Mitigation

6.2.19 The proposed replacement planting must be undertaken at the earliest opportunity.

6.2.20 The principles of the proposed landscape planting associated with the Tilbury North Substation as set out in the 7.4 Outline Landscape and Ecology Management Plan ("OLEMP") Appendix D, are considered acceptable but will require the final proposals to be secured at detailed design stage.

6.2.21 Mitigation of landscape and visual effects of tall structures is difficult to achieve if only areas within the Order Limits can be used as the structures will be taller than any trees etc. This requires the embedded mitigation such siting of the pylons to be robust.

Cumulative Impact

6.2.22 The southern part of the route, between Orsett Golf Course and Chadwell St Mary is located adjacent to the route of the LTC. In the area southeast of Orsett Golf Course the proposed new structures and landscape mitigation planting for both schemes abut each other as set out in 9.9 OLEMP. It will be essential that there is coordination of the proposed mitigation planting between the two projects.

Comments on Supporting Documents

6.2.23 The visualisations and other supporting material within the Landscape and Visual Impact Assessment ("LVIA") have been prepared in accordance with standard good practice guidance.

6.2.24 The OLEMP is broadly appropriate. The Council raised some detailed points, for example requesting that replacement planting not be provided within some Local Wildlife Sites. It is agreed that these detailed points can be addressed within the detailed Outline LEMP.

6.3 Ecology

Summary

6.3.1 In Section H (Thurrock), there is not expected to be significant adverse ecological effects. During construction, the repositioning of the Tilbury North Substation avoids functionally linked habitat associated with the Thames Estuary and Marshes SPA/Ramsar and works largely take place within arable farmland of low ecological value. Localised and short-term effects on a small number of Local

Wildlife Sites may occur where individual pylons are installed, but these impacts are considered fully mitigable.

- 6.3.2 During operation, no additional adverse effects on biodiversity are anticipated provided that the Landscape and Ecology Management Plan and proposed habitat mitigation and BNG measures are implemented, with the potential for small-scale ecological enhancements. Decommissioning is expected to result in only minor, temporary disturbance, with no lasting ecological harm where mitigation measures are followed.
- 6.3.3 Overall, with appropriate mitigation and management, the Project is expected to deliver neutral to minor positive ecological outcomes in Thurrock.

National Policy Statements

- 6.3.4 At a national level, the following policy statements (and parts thereof) are particularly relevant to the consideration of the impact on the significance of ecology management arising from the development scheme:
- Department for Energy Security & Net Zero, Overarching NPS for Energy (EN-1) (December 2025). This requires applicants to apply the mitigation hierarchy, avoid significant harm to biodiversity, protected species and designated sites, and secure mitigation, compensation and monitoring through enforceable DCO requirements.
 - Department for Energy Security & Net Zero, Overarching NPS for Energy (EN-5) (December 2025). This recognises the potential adverse ecological impacts and opportunities for habitat enhancement and improved Biodiversity along the infrastructure corridor.
- 6.3.5 Paragraph 4.6.1 of EN-1 confirms: Achieving biodiversity net gain is not currently an obligation on applicants, Schedule 15 of the 2021 Act contains provisions which, when commenced, mean the SoS may not grant an application for a DCO unless satisfied that a biodiversity gain objective is met in relation to the onshore development in England to which the application relates.

National Policy/Guidance

- 6.3.6 The 2021 Act introduces a mandatory requirement for 10 % BNG for new developments, to ensure that they enhance biodiversity and create new green spaces for local communities to enjoy. Schedule 7A of the Town and Country Planning Act 1990 ("TCPA") specifies that a minimum of 10 % BNG must be delivered. The legislation introduced the Statutory Biodiversity Metric which is used to measure the biodiversity value of habitats for the purposes of BNG. Whilst BNG is a legal obligation for TCPA applications in England, the provisions in Schedule 15 of the 2021 Act to make at least 10 % BNG a legal obligation for NSIPs are not yet in force. These are anticipated to be introduced for NSIPs in May 2026.

National Planning Policy Framework

- 6.3.7 The following paragraphs with the NPPF are considered relevant:

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- 6.3.8 Paragraph 187. Planning policies and decisions should contribute to and enhance the natural and local environment by:
- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.
 - d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.
 - e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.
- 6.3.9 Paragraph 188. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework⁶⁵; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.
- 6.3.10 Paragraph 192. To protect and enhance biodiversity and geodiversity, plans should:
- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
 - b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
- 6.3.11 Paragraph 193. When determining planning applications, local planning authorities should apply the following principles:
- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.
 - b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location
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proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Thurrock Core Strategy Local Plan

6.3.12 Thurrock Core Strategy and Policies for Management of Development (as amended) January 2015:

- CSTP19 -Biodiversity.
- PMD7 – Biodiversity, Geological Conservation and Development.

Local Impact Assessment

Construction Phase

Positive Impacts

6.3.13 The decision to reposition the Tilbury Substation moved the proposed works away from functionally linked habitat connecting to the Thames Estuary and Marshes SPA /Ramsar.

Neutral Impacts

6.3.14 The proposed route follows through mainly arable farmland. Most of the area therefore has relatively low ecological value and the effects can be fully mitigated. There are small effects on three Local Wildlife Sites mainly associated with the installation of individual pylons. The effects are likely to be short-term.

Negative Impacts

6.3.15 N/A.

Operational Phase

Positive Impacts

6.3.16 If the proposed habitat mitigation and BNG measures are followed, and the Outline LEMP fully implemented, some small-scale positive ecology effects could be achieved.

Neutral Impacts

6.3.17 It is not envisaged that the scheme will have any additional adverse effects on biodiversity during operation so long as the proposed habitat mitigation measures are followed.

Negative Impacts

6.3.18 N/A.

Decommissioning Phase

Positive Impacts

6.3.19 N/A.

Neutral Impacts

6.3.20 Decommissioning may include some temporary disturbance during the removal of operational infrastructure such as vehicle goods. So long as the proposed habitat mitigation measures are followed, it is likely there will not be any negative impacts.

Negative Impacts

6.3.21 N/A.

Required Mitigation

6.3.22 The required mitigation measures contained in the ES, Code of Construction Practice ("COCP") and OLEMP are considered appropriate for avoiding and mitigating effects on habitats and species within Thurrock.

Cumulative Impact

6.3.23 Rainbow Shaw is an ancient woodland which is due to be directly impacted by the construction of the LTC. A package of mitigation/compensation measures, including new woodland planting, had been outlined in that project OLEMP. There is however overlap with areas required for mitigation/compensation associated with the Tilbury North Substation. It is essential that there is no overall reduction in the amount of mitigation delivered in this location for the two schemes. It is essential that this be dealt with at detailed design and set out in the final LEMP.

Comments on Supporting Documents

6.3.24 The supporting documents provide the appropriate detail on survey results and proposed ecological mitigation and management required to assess the potential ecological effects on sites and species within Thurrock.

6.4 Built Heritage

Summary

6.4.1 It is predicted the noise and vibration in the construction phase of the Project will impact five buildings and structures; however, none of these are located within Thurrock. There are concerns regarding the LoD and the designated heritage assets in close proximity to the DCO's Order Limits. The lateral, longitudinal and vertical LoD could potentially worsen temporary (construction) and permanent impacts

on the setting and significance of heritage assets. This flexibility could allow pylons, overhead lines, substations and other structures to shift closer to sensitive heritage receptors therefore exacerbating visual impacts.

6.4.2 Within Section H (Thurrock), two listed buildings remain at risk because the restrictions introduced through Commitment GG34 in the OCoCP (Document 7.2) apply only to controlling longitudinal movement within the LoD. This leaves lateral and vertical deviations unrestricted and therefore still capable of bringing project infrastructure closer to these sensitive heritage assets, increasing the likelihood of adverse effects on their setting and significance.

National Policy Statements

6.4.3 At a national level, the following policy statement (and parts thereof) is particularly relevant to the consideration of the impact on the significance of built heritage assets arising from the development scheme:

- Department for Energy Security & Net Zero, Overarching NPS for Energy (EN-1) (December 2025) – Section 5.9 Historic Environment.

6.4.4 Paragraphs 5.9.11 to 5.9.17 relate to the Applicant's Assessment. Paragraph 5.9.9 relates specifically to the consideration of Non-Designated Heritage Assets ("NDHAs").

6.4.5 The Applicant's Assessment is compliant with the policy set out in these paragraphs with regards to designated heritage assets.

6.4.6 Clarification has been sought from the Applicant, and provided, regarding the identification of built NDHAs as part of the baseline assessment carried out for the ES. The Applicant has confirmed in an email dated 10 December 2025 that non-designated buildings were identified that were not already included on the Historic Environment Record, primarily through historic mapping. They have confirmed that the methodology for desk-based research and walkover included identification of any previously unknown heritage assets, including historic buildings.

6.4.7 Locally listed buildings 'or those of equivalent quality in their fabric or historical associations' and 'Assets of local importance' have been assigned a Low Value/Sensitivity in the Applicant's Assessment and the settings of these assets have not been assessed due to 'the lack of potential for any impacts to these assets to result in significant effects...'. Further clarification has been provided by the Applicant that '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.'

6.4.8 The impact of the proposed development on the setting and significance of some built NDHAs has, therefore, not been assessed. However, the Applicant considers that their assessment has appropriately complied with the relevant policy in the NPS (EN-1) and is proportionate to the importance/significance of the heritage assets.

6.4.9 Paragraphs 5.9.18 to 5.9.22 relate to mitigation.

6.4.10 Paragraphs 5.9.23 to 5.9.37 relate to SoS decision making.

6.4.11 Paragraph 5.9.27 and 5.9.28 are particularly relevant with regards to designated heritage assets. The highest level of harm to the significance of designated heritage assets (listed buildings and conservation areas) identified by the Applicant arising from the scheme is a Mid-level of Less than Substantial Harm ("LTSH").

6.4.12 Paragraph 5.9.34 requires that 'in weighing applications that directly or indirectly affect NDHAs, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'. The Applicant has not expressed impacts on built NDHAs specifically in terms of 'harm to significance.' Their assessment identifies whether any element of an asset would be physically impacted (lost/removed) by the project and assesses impact through change to setting that affects value for medium and high value NDHAs.

National Policy Context

6.4.13 The following guidance is relevant to the consideration of built heritage assets, their setting and significance:

- National Planning Practice Guidance: Conserving and Enhancing the Historic Environment (2019).
- Historic England, Historic Environment Good Practice Advice Note 2: Decision-Taking in the Historic Environment (2015).
- Historic England, Historic Environment Good Practice Advice Note 3: The Setting of Heritage Assets (2017).
- Historic England Advice Note 1: Conservation Area Appraisal, Designation and Management, (2019, Second Edition).
- Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (2019).

Thurrock Core Strategy Local Plan

6.4.14 The following local policy documents and specific policies and paragraphs are relevant to built heritage:

- Thurrock Core Strategy and Policies for Management of Development (as amended) January 2015:
 - CSTP24: Heritage Assets and the Historic Environment.
 - Policy PMD4: Historic Environment.

Local Impact Assessment

6.4.15 The assessment of impacts provided by the Applicant was discussed in the Council's response provided at the Relevant Representations stage of the project, in a letter dated 27 October 2025. The level of impact upon the setting and significance of designated heritage assets set out in document APP-210: 6.11.A2 ES 'Appendix 11.2 - Historic Environment Assessment Tables (Final Issue A)' is agreed; this impact assessment is understood to be based upon the route shown in the Works Plans, documents APP-019, APP-020, APP-022 and APP-023 of the Examination Library.

Construction Phase Impacts

Positive Impacts

6.4.16 N/A

Neutral Impacts

6.4.17 *Construction Vibration Effects on Buildings and Structures*

6.4.18 In Document 6.14 ES 'Chapter 14 - Noise and Vibration (APP-2569)', the Applicant has identified the potential for damage to a total of five buildings or structures due to construction vibration from potential compaction activities. None of these are located in Thurrock.

6.4.19 No structures or buildings have been identified where there is the potential for damage from vibration from potential piling activities in any project section.

Negative Impacts

6.4.20 N/A

Operational Phase Impacts

Positive Impacts

6.4.21 N/A

Neutral Impacts

6.4.22 N/A

Negative Impacts

6.4.23 N/A

Decommissioning Phase Impacts

Positive Impacts

6.4.24 N/A

Neutral Impacts

6.4.25 N/A

Negative Impacts

6.4.26 N/A

Other - Draft Development Consent Order (DCO)

6.4.27 *Article 5 (Limits of Deviation)*

6.4.28 The LoD included within the Draft DCO are a concern, due to how these will allow for movement and adaptation of the route as work commences.

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- 6.4.29 The Order Limits are generally 100 m wide for the proposed overhead line (50 metres either side of the centre line of the proposed overhead line). There are concerns regarding the lateral, longitudinal (horizontal) and vertical limits of deviation set out in Article 5 of the Draft DCO with regards to the potential worsening of temporary (construction) and permanent impacts on the setting and significance of heritage assets to those set out in the Applicant's ES assessments (which are based on the Works Plan (document 2.3), ES 'Figure 4.1 Proposed Project Design' (document 6.4.F1) and 'Figure 4.2 Proposed Project Design – Permanent Features' (document 6.4.F2). The LoD could bring pylons and overhead lines up to 50 metres closer to heritage assets (laterally) and allow movement anywhere along the line of the project (longitudinally), exacerbating their detracting visual impacts. Pylons may also be of an additional height of up to 6 metres from the pylon design heights set out in the Works Plan, and up to 18 metres for certain pylons where it is necessary to allow a change from proposed low height pylons to standard height pylons.
- 6.4.30 Article 5 of the Draft DCO also sets out horizontal LoD for other permanent above ground structures, erections and apparatus including substations and sealing end compounds such that they may be located anywhere within the parameters shown by the pink dashed lines on the Works Plans. They may also be up to 10% above the maximum height shown on the table of parameters forming part of the Works Plans (and may also be any amount lower in height as the undertaker considers convenient).
- 6.4.31 The LoD are of particular potential concern with regards to the following designated heritage assets which are in closest proximity to the Order Limits and where a Mid-level of LTSH to their significance has been identified by the Applicant at the operation and maintenance phase of the Project. NB: These are provided as examples and are not intended to be an exhaustive list of all assets where there are potential concerns with regards to the LoD. There is the potential for designated heritage assets that have been assessed as having a Low level of LTSH to their significance to experience a Mid-level of LTSH due to pylons, overhead lines and other permanent above ground structures being located in closer proximity within the lateral and longitudinal limits of deviation.
- 6.4.32 Thurrock (Section H):
- Grade II listed Wyfields Farmhouse (List entry number 1337057).
 - Grade II listed Barn to North of Wyfields Farmhouse (List entry number 1111646).
- 6.4.33 Commitment GG34 in Table 6.1 of 'Document 7.2 Outline Code of Construction Practice' ("OCOCP"), sets out commitments to restricting the movement of specific pylons or infrastructure along the longitudinal limits of deviation. There is a commitment to 'seek to move pylon TB245 north to reduce heritage effects of the pylon' on Grade II listed Wyfields Farmhouse (List entry number 1337057) in Thurrock (Section H), which the Council would support. Where such assets have been identified, the lateral and vertical LoD would still apply. These commitments are to be confirmed by the Main Works Contractor(s) if the Project is consented.
- 6.4.34 It is unclear whether these proposed restrictions to the LoD with regard to the setting and significance of designated heritage assets arose as part of a systematic approach to identification as part of the ES
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assessment and this should be clarified in order to establish whether similar restrictions to the LoD were considered for other assets but rejected due to other requirements/constraints or restrictions.

Required Mitigation

6.4.35 In Document 6.14 ES 'Chapter 14 - Noise and Vibration' (APP-2569) Construction Noise and Vibration Mitigation measures NV04 and NV05 are relevant but measures should be put in place to avoid damage to the five aforementioned structures rather than rectifying any damage arising from the works after the fact. Site specific measures should be set out in the Main Works Contractor(s) Noise and Vibration Management Plan as set out in NV05 and agreed prior to relevant works commencing.

Cumulative Impact

6.4.36 Cumulative effects of the development are split by the application into two categories: intra-project and inter-project.

6.4.37 Intra-project cumulative effects identified by the Applicant are those caused by the Project and therefore formally assessed within the ES. These include contamination of below ground deposits due to construction, setting effects and changes to groundwater. No further comment on this is necessary, as the intra-project effects are part of the overarching assessment.

6.4.38 Inter-project cumulative effects are those which are resultant of the combination of the Project and other existing projects. No significant cumulative effects on the setting or significance of heritage assets have been identified within Thurrock.

Comments on Supporting Documents

6.4.39 The following commentary is taken from the letter provided at the Relevant Representations stage, however, due to the importance of this matter and for ease of reference, it is reiterated (and amended where applicable) below.

6.4.40 The Applicant's assessment of the impacts of the project on the historic environment have been provided taking into account all proposed mitigation measures. The overall approach to mitigating the negative effects of the proposed development is set out in Document 6.5 ES 'Chapter 5 - EIA Approach and Method (Final Issue A)' of the submission. Mitigation has been split into three types by the Applicant in relation to heritage assets: embedded, standard and additional. Descriptions of these are outlined on pages 98-100 of Document 6.11 ES 'Chapter 11- Historic Environment (Final Issue A)'.

6.4.41 The embedded and standard mitigation measures are acceptable in principle, however, the residual effects of the proposals at both construction and operation and management phases of the Project include a Mid-level of LTSH to the significance of some designated heritage assets (a summary is provided).

6.4.42 Regarding additional mitigation measures, Document 6.11 ES 'Chapter 11- Historic Environment (Final Issue A) reads:

11.6.10 As a result of the assessment within this ES, as defined in Section 11.7, additional mitigation is required. Any mitigation for historic buildings or historic landscapes would be secured through the measures set out in embedded and standard mitigation above.

6.4.43 At the Relevant Representations stage, the Council assumed this is meant to read 'additional mitigation is not required', however, the Applicant has since clarified the wording is correct as they have identified the requirement for additional mitigation for archaeology.

6.4.44 It is agreed that, in many cases, the introduction of measures such as additional planting to screen the proposed development in views from, towards and including built heritage assets would not be desirable where it would have the effect of curtailing or truncating views across an open agrarian landscape setting which contributes to the understanding of an asset's historic function and which helps reveal its architectural interest.

6.4.45 Following our review and assessment of the Applicant's conclusions on the impacts of the Project on heritage assets, for each designated heritage asset where a Mid-Level of LTSH has been identified to its significance at the operation and maintenance phase of the Project, the Council would request further details are provided by NGET regarding the embedded mitigation measures that have been employed, for example, the selected overhead line routes and pylon locations and whether or what, if any, alternatives were assessed prior to the submitted project design.

6.4.46 Standard mitigation measures relate to the construction phase of the Project. Of these, the following are relevant:

H06: Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). Where such features cannot be retained, replacement will be installed as appropriate (including reinstating hedgerows, fences, walls and earthworks).

6.4.47 The Council recommends that this is further expanded to clarify the definitions of 'appropriate' replacements, and ask for the relevant local authorities to be contacted before such elements are removed, in order to discuss the manner of replacement as well as the extent of any removals of fences, walls, etc.

H07: Commitment NV04 (see Outline CoCP (document reference 7.2)) will be applied in relation to any designated historic buildings with potential to be impacted by construction vibration.

6.4.48 The Council recommend expansion of H07, to create a hotline or method of contact for building owners who are concerned about the effects of construction vibration on their buildings as works are undertaken, to allay fears and allow the monitoring of effects.

6.4.49 Following the Council's review and assessment of the Applicant's conclusions on the impacts of the Project on heritage assets, for each designated heritage asset where a Mid-Level of LTSH has been identified to its significance at the construction phase of the Project, the Council would request further details are provided by the Applicant regarding the mitigation measures that have been employed, for example, the selected locations of haul roads and other aspects of construction related activity and

infrastructure and whether or what, if any, alternatives were assessed prior to the submitted project design.

6.5 Air Quality

Summary

- 6.5.1 Following a review of the documents submitted related to air quality, no positive local air quality impacts within Section H (Thurrock) have been identified during the construction, operational or decommissioning phases of the proposed development.
- 6.5.2 During the construction phase, the use of Non-Road Mobile Machinery ("NRMM") and generators has been assessed and is considered as having neutral local impact. During the operational phase, the proposed development will introduce limited occasional additional traffic movements to the road network which is considered to represent a neutral local impact. No neutral local air quality impacts within Section H (Thurrock) have been identified during the decommissioning phase of the proposed development.
- 6.5.3 No negative local impacts within Section H (Thurrock) identified during the operational phase of the proposed development. However, during the construction phase, there will be additional traffic introduced to the road network from the proposed development, including through two Air Quality Management Areas ("AQMAs") within Thurrock, with the negative impacts this could have on local air quality potentially being augmented by the cumulative effects when combined with traffic from other schemes such as the LTC.

National Policy Statements

- 6.5.4 At a national level, the following policy statement is of relevance.

Overarching Policy Statement for energy (EN-1), 2025:

"5.2.1 Energy infrastructure development can have adverse effects on air quality. The construction, operation and decommissioning phases can involve emissions to air which could lead to adverse impacts on health, on protected species and habitats, or on the wider countryside and species. Air emissions include particulate matter (for example dust) up to a diameter of ten microns (PM10) and up to a diameter of 2.5 microns (PM2.5) as well as gases such as sulphur dioxide, carbon monoxide and nitrogen oxides (NOx)."

National Policy/Guidance

Clean Air Strategy 2019:

- 6.5.5 The Clean Air Strategy 2019 sets out the actions required to meet the targets set to reduce emissions of air pollution.

"The UK has set stringent targets to cut emissions by 2020 and 2030. The goal is to reduce the harm to human health from air pollution by half."

Environment Act 2021

- 6.5.6 The 2021 Act introduces a commitment to create a legally binding duty on government to reduce the concentrations of fine particulate matter (PM2.5) in ambient air, and to set a long-term target expected to be 10 µg/m³, a reduction from the current Air Quality objective of 20 µg/m³ set out within the Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020. The 2021 Act requires a draft of a statutory instrument (or drafts of statutory instruments) containing regulations setting that the PM2.5 air quality target must come into force.

A Green Future: Our 25 Year Plan to Improve the Environment

- 6.5.7 The 25-year plan sets out the Government's actions to help maintain a healthy natural world, including delivering cleaner air in our cities and rural landscapes.

“The UK’s determination to improve air quality is reinforced by our commitment to meeting ambitious, legally-binding targets to cut emissions of five pollutants – ammonia, nitrogen oxides, non-methane volatile organic compounds, fine particulate matter and sulphur dioxide – by 2020 initially, and by 2030 for a deeper cut.”

National Planning Policy Framework

- 6.5.8 Paragraph 187 of the NPPF is of relevance to the proposals.

“187. Planning policies and decisions should contribute to and enhance the natural and local environment by:

... e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; ...”

Thurrock Core Strategy Local Plan

- 6.5.9 Thurrock Local Development Framework, Core Strategy and Policies for Management of Development ("PMD") (Adopted January 2015):

PMD1 – Minimising Pollution and Impacts on Amenity, Health, Safety and the Natural Environment

“The main sources of pollution in Thurrock are emissions from road transport and industrial processes. Although in recent decades, cleaner fuels and the implementation of pollution control policies have led to some reductions, pollution attributed to motor vehicles remains, with heavy goods vehicles (HGVs) being the main contributors. Thurrock has fifteen Air Quality Management Areas (AQMAs) mainly in the west of the Borough, in close proximity to major transport routes, such as the M25 and A13.”

“1. Development will not be permitted where it would cause or is likely to cause unacceptable effects on:

- i. the amenities of the area;*

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- ii. *the amenity, health or safety of others;*
 - iii. *the amenity, health or safety of future occupiers of the site; or*
 - iv. *the natural environment.”*

[...]

3. *The Council will require assessments to accompany planning applications where it has reasonable grounds to believe that a development may suffer from, or cause:*

- i. Air pollution; ...”*

PMD9 – Road Network Hierarchy

“This policy ensures that proposals for development affecting the highway will be considered in relation to the road network hierarchy and the function of each level of that hierarchy. The aim is to enhance the street scene and to mitigate adverse impacts on the transport system, which includes impacts on capacity, safety, air quality, and noise.”

“1. Routes of all levels The Council will only permit the development of new accesses or increased use of existing accesses where:

... vi. Measures are taken to mitigate all adverse air quality impacts in or adjacent to Air Quality Management Areas...”

Local Impact Assessment

Construction Phase

Positive Impacts

6.5.10 No positive impacts identified.

Neutral Impacts

6.5.11 Document 6.7 ES 'Chapter 7 – Air Quality' (paragraphs 7.7.24 - 7.7.28) includes a qualitative assessment of NRMM and generator emissions during the construction phase. The assessment determines that the effects from emissions from construction equipment and plant are likely to be neutral and not significant. This is considered to be a reasonable conclusion.

Negative Impacts

6.5.12 Document 6.7 ES 'Chapter 7 – Air Quality' (paragraph 7.5.11 and 7.5.12) correctly identifies two AQMAs which are located within 200 m of the Affected Road Network ("ARN"). AQMA No.4 was declared for exceedances of the annual NO₂ standard. AQMA No.5 was declared for exceedance of the annual NO₂ standard alongside the daily (24- hour) PM₁₀ standard. These AQMAs have identified road traffic as a predominant source of pollution, from the surrounding A roads (A1306 and A13).

6.5.13 Whilst the air quality assessment undertaken is generally considered robust in terms of following appropriate policy and guidance and using suitable methodology to undertake modelling, it is of concern that there are only three residential receptors assessed within Section H (Thurrock). These receptors (HR_57, HR_58 and HR_59) are all located adjacent/in close proximity to the stretch of the A13 between

the Southfields roundabout and Stanford-le-Hope. Policies PMD1 and PMD9 both specifically refer to the AQMAs within Thurrock, with PMD9 stating that “*The Council will only permit the development of new accesses or increased use of existing accesses where: ... vi. Measures are taken to mitigate all adverse air quality impacts in or adjacent to Air Quality Management Areas.*”

- 6.5.14 It is unclear why the assessment modelling has not included receptors within AQMA No.4 and No.5, despite being identified as key areas of concern which are located within the ARN for the proposed scheme.
- 6.5.15 There is further concern that the traffic data used within modelling for the air quality assessment may be based on outdated predictions on assumed construction phase vehicle movements, which brings some uncertainty to the validity of the modelled results in terms of potential air quality impacts.
- 6.5.16 Further to this, it is identified within ES 'Chapter 7 – Air Quality' (paragraphs 7.9.3 and 7.9.6) that there are potential uncertainties related to other nearby projects, such as the LTC. Despite this, there is no further consideration given within the assessment regarding the potential cumulative effects of additional construction traffic on the ARN of the scheme combined with the significant additional traffic which would be expected (due to proximity) on the same road network during construction and operation of the LTC.
- 6.5.17 In the absence of the key considerations regarding the potential effects of the scheme at sensitive receptors with AQMA No.4 and No.5, and without sufficient information provided regarding the potential cumulative effects in combination with the LTC and other nearby schemes, there is currently insufficient information to demonstrate that the proposals are not in contravention of Thurrock policies PMD1 and PMD9 in terms of air quality. Consequently, based on the insufficient information currently available, the Council cannot rule out further mitigation measures being sought.

Operational Phase

Positive Impacts

- 6.5.18 No positive impacts identified.

Neutral Impacts

- 6.5.19 Limited occasional additional traffic movements from staff undertaking inspections, maintenance and repairs required during the operational phase would not result in adverse effects on local air quality.

Negative Impacts

- 6.5.20 No negative impacts identified.

Decommissioning Phase

Positive Impacts

- 6.5.21 No positive impacts identified.

Neutral Impacts

6.5.22 No neutral impacts identified.

Negative Impacts

6.5.23 The 'Environmental Impact Assessment Scoping Opinion' (Document 6.20) included agreement that the decommissioning impacts related to traffic and transport do not need to be included. However, similar considerations should be given to the potential air quality impacts during the decommissioning phase as those detailed for the construction phase (i.e. dust from decommissioning works, decommissioning vehicle emissions).

Required Mitigation

6.5.24 ES 'Appendix 7.3 – Air Quality Assessment Results' (paragraph 7.2.2) states that assessment undertaken in accordance with Institute of Air Quality Management ("IAQM") methodology identified that there would be a high risk of dust impact within Section H (Thurrock) during the construction phase of the proposed scheme without mitigation. This level of risk has informed dust management measures to be implemented as part of the standard mitigation for the project, as detailed within 'OCoCP Appendix D - Outline Dust Management Plan (Final Issue A)' (Document 7.2). The mitigation measures included are based on recommendations detailed within Section 8.2 of the 2024 IAQM Guidance Document 'Guidance on the Assessment of Dust from Demolition and Construction'. Given the high level of risk of dust impact identified in the assessment, it is a requirement that the mitigation measures detailed within the Outline Dust Management Plan are implemented to minimise potential impacts.

6.5.25 Further documents have been submitted outlining a variety of construction traffic measures proposed to be implemented during the construction phase of the scheme ('Document 7.3 Outline Construction Traffic Management Plan (Final Issue A) + Appendices). The CTMP includes measures which if not implemented could directly influence the air quality impacts of the proposed scheme. For example, a key element of the construction transport strategy is to use largely continuous haul roads to reduce the effects on the local highway network during construction ('ES Chapter 16 – Traffic and Transport', paragraph 16.6.6), with measures also proposed to minimise the impact of these haul roads on PRowS. The implementation of such measures within the Outline Construction Traffic Management Plan is required to ensure there are no resultant residual effects on air quality impacts.

Cumulative Impact

6.5.26 'ES Chapter 7 – Air Quality' (paragraph 7.5.7) states that the "...background data provided by Defra inherently includes contributions from all sources, including local traffic, and is used to represent the cumulative environmental context." However, as detailed in the Construction Phase Impacts section above, there are potential uncertainties related to other nearby projects, such as the LTC, and detailed consideration of the potential cumulative air quality effects combined with such schemes should be undertaken.

Comments on Supporting Documents

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- 6.5.27 The general approach to the air quality assessment undertaken, as presented in 'ES Chapter 7 – Air Quality', is considered robust in terms of being undertaken in accordance with appropriate policy and guidance, and the technical method by which the modelling and assessment has been completed. However, as detailed above, it is considered that further information is required to allow a full determination to be made on the potential air quality effects of the scheme within Section H (Thurrock) of the DCO Application. Further information should be provided on the following:
- i. Assessment of air quality impacts at sensitive receptors within AQMA No.4 and AQMA No.5.
 - ii. Assessment/consideration of the potential cumulative air quality effects in combination with other nearby schemes including LTC.
 - iii. Clarification that the traffic data used within modelling for the air quality assessment may be based on accurate, up to date predictions on assumed construction phase vehicle movements.
- 6.5.28 In the absence of information regarding these areas of concern, there is currently insufficient information to demonstrate that the proposals are not in contravention of TCs policies PMD1 and PMD9 in terms of the potential air quality effects resulting from the proposed development.
- 6.5.29 The mitigation measures detailed within 'Document 7.2 OCoCP Practice Appendix D - Outline Dust Management Plan (Final Issue A)' and those relevant to air quality within 'ES Chapter 16 – Traffic and Transport' are considered appropriate and should be implemented to minimise the potential air quality effects of the scheme during the construction phase.

6.6 Noise and Vibration

Summary

- 6.6.1 The Project is predicted to give rise to its most notable local noise impacts during the construction phase within Section H (Thurrock), where construction activities such as highway works, pylon installation, overhead line works, haul roads and access routes have the potential to result in significant adverse noise effects at residential receptors within approximately 300 m of works, with perceptible vibration possible within around 100 m if not adequately managed. The risk of disturbance is increased where works take place outside standard working hours, particularly during evening and night-time periods when background noise levels are lower, and current proposals rely largely on reactive monitoring with limited detail on complaints handling and escalation.
- 6.6.2 During operation, no significant noise effects are predicted following the implementation of embedded design measures and standard mitigation, with operational noise from the Tilbury North Substation assessed as compliant with BS 4142 criteria (rating and assessing industrial and commercial sound) and any residual noise expected to be low-level and not significant.
- 6.6.3 Decommissioning activities are anticipated to result in temporary noise and vibration effects similar to construction but of shorter duration, with no long-term impacts expected, subject to the application of best practicable means and appropriate management controls.

National Policy Statements

6.6.4 The Noise Policy Statement for England ("NPSE") provides the overarching national policy framework for noise management. The NPSE seeks to:

- Avoid significant adverse impacts on health and quality of life arising from noise;
- Mitigate and minimise adverse impacts on health and quality of life where avoidance is not possible; and
- Contribute to the improvement of health and quality of life through the effective management and control of noise.

6.6.5. The NPSE introduces the concepts of No Observed Effect Level ("NOEL"), Lowest Observed Adverse Effect Level ("LOAEL") and Significant Observed Adverse Effect Level ("SOAEL"), which underpin the assessment of noise effects and the determination of appropriate mitigation. These principles are directly relevant to construction noise, particularly where works are proposed outside standard daytime hours.

National Policy/Guidance

6.6.6 Relevant national policy and guidance include:

- BS 5228-1 and BS 5228-2: Code of practice for noise and vibration control on construction and open sites.
- BS 4142:2014+A1:2019 – Methods for rating and assessing industrial and commercial sound.
- Control of Pollution Act 1974 (Section 61).
- Environmental Protection Act 1990.
- DMRB LA 111: Noise and Vibration.

6.6.7 These documents establish expectations for the use of Best Practicable Means, Appropriate Assessment methodologies, and the need for effective mitigation, monitoring and enforcement.

National Planning Policy Framework

6.6.8 The NPPF sets out clear requirements in relation to noise and pollution impacts. Paragraphs 187 and 198 of the NPPF are directly relevant to the consideration of construction and operational noise impacts arising from the proposed development.

6.6.9 Paragraph 187(e) of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of noise pollution, and that development should, wherever possible, help to improve local environmental conditions.

6.6.10 Paragraph 198 of the NPPF requires that planning policies and decisions ensure that new development is appropriate for its location, taking into account the likely effects, including cumulative effects, of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or wider area. In doing so, decision-makers should:

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- Mitigate and reduce to a minimum potential adverse impact resulting from noise from new development, and avoid noise giving rise to significant adverse impacts on health and quality of life; and
 - Identify and protect tranquil areas which have remained relatively undisturbed by noise and are valued for their recreational and amenity purposes.

Thurrock Core Strategy Local Plan

6.6.11 Policy PMD1 of the Thurrock Council Core Strategy and Policies for the Management of Development is of direct relevance.

6.6.12 Policy PMD1 states that development will not be permitted where it would cause, or be likely to cause, unacceptable effects on:

- the amenities of the area;
- the amenity, health or safety of others;
- the amenity, health or safety of future occupiers of the site; and
- the natural environment.

6.6.13 Policy PMD1 requires consideration to be given to the location of sensitive land uses, including housing, schools and health facilities, and to areas of recreational and amenity value which are relatively undisturbed by noise and valued for this reason.

6.6.14 Policy PMD1 also requires assessments to accompany planning applications where the Council has reasonable grounds to believe that a development may cause or be affected by noise pollution. Where assessments confirm potential harm, planning permission will only be granted where satisfactory solutions can be achieved through design or appropriate mitigation secured by condition or planning obligation. Where adequate assessment is not provided, the policy allows for refusal on a precautionary basis.

Local Impact Assessment

Construction Phase

Positive Impacts

6.6.15 N/A

Neutral Impacts

6.6.16 Short-duration, transient construction activities where noise and vibration levels remain below LOAEL thresholds at nearby receptors.

Negative Impacts

6.6.17 Construction activities within Section H (Thurrock) have the potential to give rise to significant adverse noise effects at residential noise-sensitive receptors within approximately 300 m of works, particularly

from highway remediation works, new pylon construction, overhead line works, haul roads, and access routes.

- 6.6.18 Construction vibration impacts may be perceptible at receptors within approximately 100 m of vibration-generating activities and could result in disturbance if not adequately managed.
- 6.6.19 The Project allows for construction works to take place outside standard working hours in certain circumstances. Out-of-hours working increases the risk of significant adverse effects on residential amenity, particularly during evening and night-time periods when background noise levels are lower.
- 6.6.20 The complaints procedure, as currently described, lacks sufficient detail on response times, escalation mechanisms, and feedback arrangements, which may reduce confidence that noise and vibration issues will be promptly and effectively addressed.
- 6.6.21 Routine noise and vibration monitoring is not currently proposed. Reliance on reactive monitoring alone increases the risk that exceedances or emerging issues may not be identified at an early stage, particularly where residents are reluctant to complain.
- 6.6.22 The ES does not commit to reassessing construction noise and vibration impacts if final pylon positions or other infrastructure move closer to dwellings within the LoD. A reduction in separation distance of approximately 50 m could materially alter predicted noise and vibration levels and the significance of effects, meaning the assessment envelope cannot reasonably be considered worst case in these circumstances.

Operational Phase

Positive Impacts

- 6.6.23 No significant operational noise impacts are predicted from the Project following the implementation of embedded design measures and standard mitigation.

Neutral Impacts

- 6.6.24 Operational noise from the proposed Tilbury North Substation is assessed as acceptable, with predicted noise levels compliant with BS 4142 criteria when assessed against existing background noise levels.
- 6.6.25 Impacts should be assessed, where relevant, in accordance with BS 4142, which considers the character of sound, including tonality, intermittency and impulsivity, as well as absolute noise levels.

Negative Impacts

- 6.6.26 Low-level operational noise from substation equipment may be perceptible at the nearest receptors but is not predicted to result in significant adverse effects.
- 6.6.27 Further assessment may be required should operational details, plant specifications or layouts be confirmed or altered at a later stage.

Decommissioning Phase

Positive Impacts

6.6.28 No long-term noise or vibration impacts anticipated.

Neutral Impacts

6.6.29 Decommissioning activities would be similar in nature to construction but of shorter duration.

Negative Impacts

6.6.30 Temporary noise and vibration impacts similar to construction, subject to best practicable means and management controls.

Required Mitigation

6.6.31 This section sets out the suggest mitigation measures which may render the proposed development acceptable to the Council in term of noise and vibration matters:

- Implementation of the CoCP, including the Noise and Vibration Management Plan.
- Application of Best Practicable Means in accordance with BS 5228.
- Use of quieter plant, screening, acoustic enclosures, and appropriate siting of static equipment.
- Construction hours: Clarity and tighter control are required where construction activities are proposed outside standard working hours. Out-of-hours works should be strictly limited, clearly justified, and subject to enhanced mitigation and prior agreement with the Council.
- Complaints procedure: A clearer, more robust complaints procedure is required, including clear response times, escalation routes, and feedback to complainants. Complaints records should be shared with the Local Authority on request.
- Noise and vibration monitoring: Although routine monitoring is not currently proposed, regular monitoring is recommended. This may include informal routine checks (e.g. listening checks) supported by reactive attended monitoring where complaints or exceedances are identified. Detailed records should be maintained and made available to the Council on request.
- Section 61 consents under the Control of Pollution Act 1974 where appropriate.
- Worst-case assessment and mitigation trigger: A clear commitment is required to reassess construction noise and vibration impacts where final pylon positions or other infrastructure are located closer to noise-sensitive receptors than assumed in the ES, within the LoD. Where reassessment identifies an increase in predicted impacts or a change in significance, additional mitigation must be identified, agreed with the Council, and implemented.

Cumulative Impact

6.6.32 Section H (Thurrock) is subject to cumulative noise effects from existing strategic road infrastructure and other major developments, including the proposed LTC.

6.6.33 Construction noise from the Project could contribute to short-term cumulative effects; however, these are temporary and managed through standard mitigation and best practicable means.

6.6.34 In the longer term, increased background noise from other major infrastructure schemes may reduce the relative impact of operational noise from the Project.

Comments on Supporting Documents

- 6.6.35 number of limitations are identified for Section H (Thurrock). ES Chapter 14 (Noise and Vibration) and oCoCP provides a comprehensive assessment; however, there are some limitations in the assessments as outlined below.
- 6.6.36 The oCoCP does not require reassessment of noise and vibration impacts where final pylon positions move closer to receptors within the Limits of Deviation (LoD). A reduction in separation distance of approximately 50 m would be significant and could materially change the magnitude and significance of effects.
- 6.6.37 The assessment envelope cannot reasonably be described as worst case unless it explicitly assesses the closest possible receptor distances permitted by the LoD.
- 6.6.38 A commitment is therefore required to reassess construction noise and vibration impacts where detailed design results in infrastructure being located closer to dwellings than assumed in the ES, and to update mitigation accordingly.
- 6.6.39 Further clarity is also required on the management of out-of-hours working and the operation of the complaints procedure.

6.7 Economic Development

Summary

- 6.7.1 The Project has the potential to provide strategic infrastructure benefits that support long-term economic growth; however, it also presents risks of temporary disruption and longer-term constraints affecting businesses and strategic employment land within Thurrock. The significance of these impacts is influenced by the scale, duration and coordination of works, and the effectiveness of mitigation measures aimed at maintaining access, supporting affected businesses and minimising permanent constraints on economic activity.

National Policy Statements

- 6.7.2 At a national level, the following policy statement (and parts thereof) is particularly relevant to the consideration of the impact arising from the development scheme:
- Department for Energy Security & Net Zero, Overarching NPS for Energy (EN-1) (December 2025). This highlights the importance of minimising impacts on local communities and businesses, particularly during construction, and securing local benefits where possible through employment, supply chain opportunities, and skills development.

National Policy/Guidance

- 6.7.3 Overarching NPS EN-1 identifies that applicants should consider the full range of socio-economic impacts (Chapters 4 and 5), including temporary and permanent effects on local businesses, employment, and economic activity (paragraphs 4.3.5–4.3.6; 4.4.3–4.4.7; 5.7–5.7.9). It also recognises

the importance of mitigation measures to reduce adverse effects on local communities and support local employment opportunities.

National Planning Policy Framework

- 6.7.4 Relevant NPPF Paragraphs regarding the subject matter.
- 6.7.5 The NPPF provides relevant context. In particular, paragraphs 85, 86 and 87 of the NPPF emphasise the importance of supporting a strong and competitive economy, protecting existing businesses and employment land, and ensuring that significant adverse impacts on economic activity are avoided or appropriately mitigated.

Thurrock Core Strategy Local Plan

- 6.7.6 Relevant Local Core Strategy/Emerging Plan policies/Supplementary Planning Documents regarding the subject matter.
- 6.7.7 Thurrock Core Strategy and Policies for the Management of Development (2011) identify Thurrock as a key location for strategic employment growth, logistics, port-related activity and infrastructure serving the wider Southeast and London economy.
- 6.7.8 Relevant themes include:
- Protection of strategic employment areas, particularly within the Thames Gateway growth area.
 - Support for the Port of Tilbury and associated logistics, warehousing and industrial uses.
 - The role of infrastructure in enabling growth, while ensuring development does not compromise existing or future economic activity.
- 6.7.9 Although the Council does not currently have a standalone Economic Development Strategy, these objectives remain embedded within the adopted development plan and associated evidence base.

Local Impact Assessment

Construction Phase

Positive Impacts

- 6.7.10 There is the potential for short-term employment opportunities associated with construction activities, including opportunities for local contractors and suppliers where procurement practices allow.

Neutral Impacts

- 6.7.11 Limited long-term economic benefit is anticipated from construction activity alone, given the temporary nature of the works.

Negative Impacts

- 6.7.12 There will be disruption to businesses, particularly those reliant on efficient access, servicing, and supply chains, including logistics and port-related operations in and around Tilbury.

6.7.13 The Application does not provide sufficient clarity or detail to enable the Council to assess how business disruption will be minimised, monitored and addressed in real time during the construction phase.

Operational Phase

Positive Impacts

6.7.14 N/A.

Neutral Impacts

6.7.15 N/A

Negative Impacts

6.7.16 Limited evidence has been provided to demonstrate that long-term operational impacts on strategic employment areas have been fully minimised.

Decommissioning Phase

Positive Impacts

6.7.17 There is the potential for short-term employment opportunities associated with decommissioning activities, however a clear description of the types, skills and numbers of workers anticipated for construction and decommissioning is required from the Applicant in order to fully assess the impact.

Neutral Impacts

6.7.18 N/A.

Negative Impacts

6.7.19 Temporary disruption to businesses and access during decommissioning, this is similar in nature to the construction phase economic development impacts, if it is not appropriately managed.

Required Mitigation

6.7.20 The following mitigation is required:

- Business Engagement and Support Plan, setting out how affected businesses will be identified, engaged, and supported throughout construction and decommissioning.
- Clear commitments to maintain access to employment sites, logistics facilities and port-related operations at all times, with rapid response mechanisms where disruption occurs.
- A Local Procurement and Skills Framework, maximising opportunities for Thurrock based businesses and residents, proportionate to the scale and duration of works that includes local employment and skills opportunities and commitments.
- Measures to minimise permanent impacts on strategic employment land, including design refinements where feasible.

6.7.21 Ongoing liaison arrangements with the Council to monitor economic impacts and resolve issues promptly.

Cumulative Impact

6.7.22 The Project is located within an area of ongoing development pressure, including highway improvements, and other nationally significant infrastructure proposals affecting Thurrock. In particular, the LTC DCO will introduce additional construction activity, TM requirements, and temporary access constraints. In combination, these activities could place cumulative pressure on business operations, access to strategic employment areas, workforce availability, and supply chains, especially where construction programmes overlap. Without effective coordination and responsive mitigation, cumulative impacts could undermine business continuity and investment confidence in an area that plays a critical role in the regional and national economy.

Comments on Supporting Documents

6.7.23 The socio-economic assessment set out in the Environmental Statement Chapter 15 and supporting documentation provide limited Thurrock specific analysis of impacts on strategic employment areas, port related activity, and logistics operations.

6.7.24 Further detail would be beneficial in:

- Clearly identifying affected employment sites and businesses within Thurrock
- Demonstrating how claimed economic benefits will be realised locally Setting out enforceable mitigation measures, rather than high level commitments, particularly in relation to access, disruption, and business engagement
- A clear description of the types, skills and numbers of workers anticipated for construction and commissioning. In the absence of this information, it is challenging to assess the potential for local employment or supply chain benefits.

6.8 Public Health

Summary

6.8.1 The proposed development is expected to have impacts on public health in Thurrock. The construction phase may offer opportunities for temporary employment for construction workers, upskilling local residents and opportunities to use local suppliers and local procurement. However, concerns remain about the limited proportion of jobs reserved for local residents and the lack of clarity on healthcare infrastructure and welfare facilities for construction workers. Additionally, the reliance on a project website as the main communication channel risks exacerbating digital exclusion and alternative methods should be used. Further concerns include construction activities taking place over extended working hours and subsequent potential noise and nuisance disturbance negatively impacting nearby residents' health and wellbeing.

6.8.2 Both during the construction and operational phases, local residents' health and wellbeing may be negatively impacted by the changes in and lack of control over visual amenity, prolonged construction works, uncertain timescales and cumulative effects with other developments. There are significant concerns about reduced opportunities for physical activity for residents arising from the diversion, temporary or permanent closures of, or changes to the amenity for users of PRow's and open spaces. There must be an assessment on impacts on leisure and recreation opportunities at Orsett Golf Club in line with NPS EN-1.

6.8.3 Overall, while the Applicant's Assessment broadly follows with national and local policy guidance, additional mitigation and information is required. This includes a more inclusive communication process, stronger mitigation for extended hours construction noise, a comprehensive Recreation and Leisure Management Plan, clearer Electro Magnetic Field (EMF) engagement and clear welfare facilities for construction workers. The Council also supports Essex County Council's call for Mental Wellbeing Impact Assessment workshops to better understand and mitigate cumulative wellbeing impacts.

National Policy Statements

6.8.4 At a national level, the following policy statement (and parts thereof) is particularly relevant to the consideration of potential impacts on health and wellbeing arising from the development scheme:

- Department for Energy Security and Net Zero: Overarching NPS for Energy (EN-1) (December 2025):

Section 4.4: Health

6.8.5 **Paragraph 4.4.3** - New energy infrastructure may also affect the composition and size of the local population, and in doing so have indirect health impacts, for example if it in some way affects access to key public services, transport, or the use of open space for recreation and physical activity. In response, the Council comment that as part of the Health Chapter within the ES, the Applicant should identify and assess impact on sensitive receptors such as schools, park, care homes etc. For example, and as per our Relevant Representation [XXX] response in October 2025: "There does not appear to be an assessment of the potential impacts on leisure and recreational opportunities at Orsett Golf Club, following the re-location of the proposed sub-station from Tilbury to Orsett. This needs to be included in the assessment."

6.8.6 **Paragraph 4.4.5** - The impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate. In response, the Council comment that while the applicant has undertaken a Cumulative Assessment the information from this has not been drawn through into the ES 'Chapter 10 – Health and Wellbeing' (Document 6.10) and this needs to be addressed to understand the potential cumulative impacts fully, particularly in relation to LTC.

Section 5.11: Land Use, Including Open Space, Green Infrastructure and Green Belt

6.8.7 **Paragraph 5.11.6** - The Government's policy is to ensure there is adequate provision of high-quality open space and sports and recreation facilities to meet the needs of local communities. Connecting

people with open spaces, sports and recreational facilities all help to underpin people's quality of life and have a vital role to play in promoting healthy living. In response, the Council's comment that this should be considered in terms of potential cumulative impacts arising from closure of other routes both associated with the Project but also with other developments coming forward e.g. LTC.

Section 5.12: Noise and Vibration

6.8.8 **Paragraph 5.12.1** - Excessive noise can have wide-ranging impacts on the quality of human life and health such as annoyance, sleep disturbance, cardiovascular disease and mental ill-health. It can also have an impact on the environment and the use and enjoyment of areas of value such as quiet places and areas with high landscape quality.

6.8.9 **Paragraph 5.12.6** - Where noise impacts are likely to arise from the proposed development, the Applicant should include the following in the noise assessment:

Specifically:

A prediction of how the noise environment will change with the proposed development:

- In the shorter term, such as during the construction period;
- In the longer term, during the operating life of the infrastructure; and
- At particular times of the day, evening and night (and weekends) as appropriate, and at different times of year.

Section 5.13: Socio-Economic Impacts

6.8.10 **Paragraph 5.13.4** - The Applicant's Assessment should consider all relevant socio-economic impacts, which may include:

Specifically - the impact of a changing influx of workers during the different structure, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and could alter the demand for services and facilities in the settlements nearest to the construction work (including community facilities and physical infrastructure such as energy, water, transport and waste). There could also be effects on social cohesion depending on how populations and service provision change as a result of the development.

Cumulative effects - if development consent were to be granted for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region.

6.8.11 In response, the Council comment that, an assessment of the potential impacts on healthcare infrastructure should be undertaken, especially given the proportion of construction workers coming in from outside of the Borough. Further information is required from the applicant about what health infrastructure and welfare facilities will be provided for construction workers within each of the Construction Compounds in Thurrock.

National Policy/Guidance

Open space, sports and recreation facilities, PRoWs and local green space - GOV.UK

6.8.12 Open space should be taken into account in planning for new development and considering proposals that may affect existing open space (see NPPF paragraph 96). Open space, which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks. It can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure (see NPPF paragraph 171, as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development (see NPPF paragraphs 7-9).

Healthy and safe communities - GOV.UK

6.8.13 The design and use of the built and natural environments, including green infrastructure are major determinants of health and wellbeing. Planning and health need to be considered together in two ways: in terms of creating environments that support and encourage healthy lifestyles, and in terms of identifying and securing the facilities needed for primary, secondary and tertiary care, and the wider health and care system (taking into account the changing needs of the population).

National Planning Policy Framework

6.8.14 The following paragraphs from the NPPF (2024), which are relevant to health and wellbeing include:

- Promoting healthy and safe communities, Paragraph 96, specifically: C) enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling
- Open Spaces and Recreation, Paragraph 105: Planning policies and decisions should protect and enhance PRoWs and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.
- Promoting Sustainable Transport, Paragraphs 109 – 111 – with a specific focus on supporting and enabling opportunities for active travel including public transport by designing attractive and well-designed walking and cycling routes.
- Section 14, Paragraphs 161-186: Meeting the challenges of climate change, flooding and coastal change.
- Section 15, Paragraphs 187-201: Conserving and enhancing the natural environment.

Thurrock Core Strategy Local Plan

6.8.15 The following local policy documents and specific policies and paragraphs are relevant to health and wellbeing:

- CSTP23 - Thurrock Character and Distinctiveness

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- CSTP9 – Wellbeing: Leisure and Sports

Other Local Policies and Guidance

- Thurrock Health and Wellbeing Strategy (2022 – 2026)
- Thurrock's Health in All Policies Approach to Place-shaping Guidance (2023)
- Relevant Thurrock Joint Strategic Needs Assessments (JSNAs)
- Thurrock Healthy Weight Strategy (2025-2030)
- Thurrock Place Partnership Programme – Find Your Active Thurrock (2025-2028) – this is a 3-year programme to increase physical activity across the Borough.

6.8.16 The Applicant has referenced the Council's Health and Wellbeing Strategy but there is no mention of the Health in All Policies Approach to Place-shaping guidance, nor any of our Joint Strategic Needs Assessment (JSNA)s. As these are not referenced, the Council require further information about how these documents have been used to inform the ES 'Chapter 10 – Health and Wellbeing' (Document 6.10) and the assessment of health and wellbeing itself, including the wider determinants of health.

Local Impact Assessment

Construction Phase

Positive Impacts

- 6.8.17 Temporary employment opportunities for local residents arising from the construction period of the project. This could also support opportunities for upskilling local residents through for example apprenticeships / internships as part of legacy benefits of the project.
- 6.8.18 Opportunities to support the local economy through use of local suppliers and local procurement.

Neutral Impacts

- 6.8.19 The Council have noted that a dedicated project website has been proposed for keeping residents and other stakeholders updated during the construction period which the Council welcome. However, the Council require further information about whether there are plans to disseminate information in alternative forms, such as through paper copies. The Council have some concerns that for residents who experience digital exclusion (for example, don't have access to the internet and / or the skills and confidence to access websites) may be disadvantaged in receiving updates. This requires further consideration to reduce health inequalities and enhance health equity.
- 6.8.20 The Council have noted that a low proportion of the construction jobs are expected to be filled by people who live locally (10% across the entire project footprint) compared to a proposed 90% of construction roles being recruited from outside of local areas (counter to the point above on local employment opportunities – this is likely overstated). Impacts on healthcare facilities do not appear to have been assessed as part of the ES 'Chapter 10 – Health and Wellbeing' (Document 6.10) and require further consideration. It would be helpful if NGET could provide further information about what health

infrastructure and welfare facilities will be provided for construction workers within each of the Construction Compounds in Thurrock.

Negative Impacts

- 6.8.21 The Council have ongoing concerns (which the Council have highlighted in each of our previous responses to this DCO Application) about the potential cumulative construction impacts on transport routes and access to healthcare facilities and other services / amenities, particularly in relation to the potential overlap in construction timelines with the LTC.
- 6.8.22 The Council are aware that the Applicant has proposed that construction activities will take place over extended periods / working hours such as at night, weekends and bank holidays. The Council have some concerns about the potential for health impacts from noise and nuisance for residents living nearby to construction during these extended work periods.
- 6.8.23 The Council have ongoing concerns (raised in our previous responses to this Application) about the impact of diversions and temporary or permanent closures of, or changes to the amenity for users of PRoWs and the potential of these closures to change residents' behaviour (leading some to engage less frequently in leisure and recreation activities along these routes / becoming less physically active). This will have consequential impacts on the achievement of increasing the levels of participation in physical activity by adults and children across the Borough but particularly in the areas of Orsett, Stanford-le-Hope and East Tilbury. While some information about these closures is outlined within the ES 'Chapter 10 – Health and Wellbeing' (Document 6.10) and the Council note the inclusion of a PRoW Management Plan as part of submission, the Council require further clarity on the description of a closure being for the “duration of works.” Furthermore, the Council have concerns about the lack of consideration of cumulative impacts of PRoW closures and diversions, particularly in relation to the cumulative impacts from the LTC.
- 6.8.24 There may be open spaces which are used recreationally which could be impacted by disruption to access or changes in amenity for users of those spaces. This could have consequential impacts on the achievement of increasing the levels of participation in physical activity by adults and children across the Borough but particularly in the areas of Orsett, Stanford-le-Hope and East Tilbury. In addition, there does not appear to be an assessment of the potential impacts on leisure and recreational opportunities at Orsett Golf Club, following the re-location of the proposed sub-station from Tilbury to Orsett. This needs to be included in the assessment to meet the requirements of the NPS EN-1.
- 6.8.25 Prolonged construction, coupled with uncertainty around timescales, proximity and the cumulative impacts arising from delivery of multiple developments over the same time period may negatively impact on mental health and wellbeing for some communities.

Operational Phase

Positive Impacts

6.8.26 The Project supports strengthening the UK's energy infrastructure and supports a move towards net-zero. Furthermore, it will enhance grid capacity that supports energy security through delivery of renewable and sustainable energy to Thurrock residents.

Neutral Impacts

6.8.27 Resident concerns, feelings and perceptions of safety as relate to EMFs – while the Council welcome the proposal that NGET may look to deliver a dedicated programme of communication and scientific information relating to EMFs, the Council require more information about what this will look to deliver, to who and how often will communications be shared.

Negative Impacts

6.8.28 Long-term changes to visual amenity may impact on perceived quality, usability and attractiveness of open spaces and PRowS for physical activity, leisure and recreation. This could have consequential impacts on the achievement of increasing the levels of participation in physical activity by adults and children across the Borough but particularly in the areas of Orsett, Stanford-le-Hope and East Tilbury.

6.8.29 Mental health impacts for local communities arising from lack of control around changes to visual amenity.

Decommissioning Phase

Positive Impacts

6.8.30 No comments.

Neutral Impacts

6.8.31 No comments.

Negative Impacts

6.8.32 No comments.

Required Mitigation

6.8.33 There is brief reference to community engagement, through use of a dedicated telephone line in which residents can raise concerns. The Council would recommend that a more detailed, structured complaints and communication procedure (response times and escalation route) would be beneficial.

6.8.34 Mitigation is required to reduce potential noise impacts arising from construction activities taking place over extended periods (e.g. nighttime and weekends) which could cause nuisance and sleep deprivation for residents living nearby. Adequate mitigation could include only working during these extended times when absolutely necessary, for as short a period as possible and undertaking lower impact activities could help to reduce/remove these noise effects. Consideration should be given to implementing such measures through relevant regulations and planning conditions.

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- 6.8.35 An assessment and identification of potential impacts for leisure and recreation along with identification of appropriate mitigation to manage these impacts should be undertaken. This should be delivered through a Recreation and Leisure Management Plan.
- 6.8.36 Further to this, given the Borough's ambitions to increase participation in physical activity across the Borough, the Council have concerns that this Project could undermine the desired positive effects of local programmes of work related to Find Your Active Thurrock. It should be considered that funding be secured, and coordinated within the Recreation and Leisure Management Plan, to engage local communities in use of PRowS and green/open spaces.
- 6.8.37 Consideration should be given to legacy enhancements to counter any localised negative impacts to residents' mental health (visual amenity/lack of control) and participation in physical activity.
- 6.8.38 Mitigation is required to appropriately manage construction impacts on transport routes (including cumulative impacts with other key developments such as the LTC) and the consequential impacts on access to healthcare facilities and other services / amenities, safety and fear and intimidation, and community severance.
- 6.8.39 Consideration should be given to what health infrastructure and welfare facilities will be provided for construction workers within each of the Construction Compounds in Thurrock.
- 6.8.40 While the Council welcome the existing proposals to provide information to residents as relates to EMFs, further mitigation should be delivered to support residents to feel more informed and in control as relates to EMFs. The Council would recommend that consideration be given to NGET delivering a series of workshops for local residents who may be impacted by the project to learn about EMFs.
- 6.8.41 The Council have noted that a dedicated project website has been proposed for keeping residents and other stakeholders updated during the construction period which the Council welcome. However, consideration should be paid to disseminating this information in alternative forms to ensure that those who experience digital inclusion are not inadvertently disadvantaged in receiving updates.
- 6.8.42 In their Relevant Representations under "Health and Wellbeing, paragraph 6.8.10" Essex County Council ("ECC") highlight the need for Mental Wellbeing Impact Assessment workshops, which were recommended by Suffolk Council during the Preliminary Environmental Impact Report ("PEIR") statutory consultation stage but which were not undertaken by the Applicant. ECC advises that these are critical for understanding how residents experience disruption and change. The Council would support ECC's recommendation that this be revisited by the Applicant and that targeted community engagement be undertaken to ensure that cumulative mental health and wellbeing impacts are fully assessed and addressed through appropriate mitigation measures. ECC's paragraph is included below for transparency and completeness.

"6.8.10. ECC notes that Mental Wellbeing Impact Assessment ("MWIA") workshops, recommended by Suffolk County during the PEIR stage, were not undertaken. The absence of such qualitative engagement means the assessment lacks depth in understanding how residents experience disruption and change. ECC recommends that the Applicant revisit this through targeted community engagement

to ensure that cumulative mental health and wellbeing impacts are adequately evaluated and addressed.”

Cumulative Impact

- 6.8.43 While the Council welcome many of the additional topics requested during the EIA Scoping for ES 'Chapter 10 – Health and Wellbeing' (Document 6.10) have been included, assessment of the cumulative health impacts have not been included, nor has any rationale been provided for why this is the case. While the Council note that a Cumulative Impact Chapter has been submitted as part of the ES submission, no information from this assessment has been brought forward into the ES 'Chapter 10 – Health and Wellbeing' (Document 6.10). It is still the Council's view that this topic should be included as part of the Health and Wellbeing Assessment, and this must be actioned to meet the requirements of the NPS EN-1.
- 6.8.44 It is noted in the cumulative impacts chapter that there are several cumulative adverse impacts (from minor through to major adverse) relating to intra and inter-project impacts in 'Project Section H' which need to be understood further in terms of the localised adverse impact on health and wellbeing.
- 6.8.45 Furthermore, the cumulative impacts relevant to health and wellbeing identified within the cumulative impact assessment provide only a general overview of cumulative health and wellbeing impact for the entire project and do not break this down by local authority area or by health topic. This makes it challenging to understand how conclusions have been reached and what the true potential health and wellbeing cumulative impacts may be.

Comments on Supporting Documents

- 6.8.46 This section comments on supporting application documents relevant to this discipline, with the purpose of illustrating where considered improvements to the assessments and mitigation measures should be made to address the concerns raised in the preceding sections.
- 6.8.47 The Cumulative impacts, community engagement and climate change and sustainability chapters of the ES and other supporting documents have not been adequately and in some cases at all been drawn through into the ES 'Chapter 10 – Health and Wellbeing' (Document 6.10). This makes it difficult to ascertain whether and how they have been considered through the lens of health and wellbeing and how they have informed the assessment, conclusions drawn and subsequently the mitigation and enhancement measures proposed.
- 6.8.48 Thurrock's Public Health Team are and have been engaged with the Applicant as relates to the Statement of Common Ground. While the team note that there are a number of outstanding matters to work through and resolve with the applicant, Thurrock's Public Health Team remain committed to joint working and will provide regular updates to the ExA.

6.9 Local Lead Flood Authority

Summary

-
- 6.9.1 The Flood Risk Assessment ("FRA") for the Project has been undertaken in line with national policy (EN-1 and the NPPF) and local Thurrock flood risk policy, with the principal flood risk effects arising during the construction phase. Several locations within Thurrock are affected by ordinary watercourses connected to the River Mardyke catchment, established overland surface water flow paths, areas of surface water flood risk, groundwater flood susceptibility and, in places, Flood Zones 2 and 3.
- 6.9.2 Without appropriate mitigation, construction activities, haul roads and temporary compounds could obstruct or alter flow routes, mobilise sediment, and increase flood risk both on site and to surrounding land, including downstream receptors. During operation, impacts are assessed as broadly neutral, provided that Sustainable Urban Drainage Systems ("SuDS") are designed, implemented and managed effectively to control surface water runoff, maintain water quality and avoid increased flood risk elsewhere.
- 6.9.3 The decommissioning phase has the potential to deliver positive flood risk outcomes through land restoration and reinstatement of natural drainage patterns. To ensure acceptability from a Local Lead Flood Authority ("LLFA") perspective, robust mitigation is required, including detailed drainage strategies, protection of ordinary watercourses, safeguarding of overland flow paths, groundwater management measures, and site-specific FRAs for areas within Flood Zones 2 and 3, demonstrating no increase in flood risk on or off site over the lifetime of the development.

National Policy Statements

- 6.9.4 At a national level, the following policy statement (and parts thereof) is particularly relevant to the consideration of the impact on the significance of flood risk management arising from the development scheme:
- Department for Energy Security & Net Zero, Overarching NPS for Energy (EN-1) (December 2025) – Section 5.8 Flood Risk.
- 6.9.5 In particular, paragraphs 5.8.13 to 5.8.23 of EN-1 comes under the Applicant's Assessment and Paragraph 5.8.15, provides the minimum requirement for FRA.
- 6.9.6 Additionally, paragraphs 5.8.24 to 5.8.35 relate to the Mitigations and paragraphs 5.8.36 to 5.8.42 related to the SoS Decision Making.

National Policy/Guidance

- 6.9.7 At the national level, the planning policy guidance on flood risk and coastal change is relevant to the consideration of flood risk management for all the developments.

National Planning Policy Framework

- 6.9.8 Paragraphs 170 to 182 of the NPPF are particularly relevant in the consideration of flood risk and sustainable drainage for this proposed development.
- 6.9.9 Within this section, paragraph 172 of the NPPF sets out the requirement for the application of the Sequential Test, ensuring that development is directed to areas at the lowest probability of flooding

where reasonably available sites exist. Paragraph 173 of the NPPF reinforces the need for a sequential approach in plan-making and decision-taking, ensuring that flood risk is considered at all stages of the development process. Paragraph 181 of the NPPF emphasises the importance of incorporating SuDS within development proposals, ensuring that surface water is managed in a sustainable manner and that flood risk is not increased elsewhere.

Thurrock Core Strategy Local Plan

6.9.10 The relevant Local Core Strategy in consideration of flood risks are as follows:

- CSTP27 Management and Reduction of Flood Risk
- PMD15 Flood Risk Assessment
- LFRM Strategy
- SFRA 2024

Local Impact Assessment

Construction Phase

6.9.11 The Order Limits and associated works are indicated on maps, ES_DocRef_6.12.F2_23 and ES_DocRef_6.12.F2_24 of ES Chapter 12 Flood Risk Areas. During the construction phase, the potential impacts at each of the identified locations within the maps indicated as (TB230 to TB260), are summarised as follows:

1. TB 230

Positive Impacts

6.9.12 The incorporation of SuDS within the development has the potential to enhance local biodiversity and ecological value of the area. In addition, the proposed treatment train approach is capable of improving surface water quality prior to discharge, thereby contributing to the protection and potential enhancement of the receiving water environment, including the River Mardyke catchment.

Neutral Impacts

6.9.13 There is no Neutral Impact in this location.

Negative Impacts

6.9.14 The site is intersected by two ordinary watercourses, identified as tributaries of the River Mardyke, commonly referred to as the Amess Sewer. These watercourses form an important part of the local drainage network. Furthermore, the site is influenced by established overland surface water flow paths generally running from east to west. In addition, the site lies within an area identified as having a high susceptibility to groundwater flooding (with a 75% or greater probability).

6.9.15 During the construction phase, there is potential for significant impacts on these ordinary watercourses, groundwater and natural overland flow routes. Without appropriate mitigation, works could lead to obstruction, diversion, sediment mobilisation, or alteration of flow regimes. This can lead to surface

water flooding in the upstream solar farms and nearby facilities, and groundwater flooding within the development.

2. TB 235

Positive Impacts

6.9.16 The incorporation of SuDS within the development has the potential to enhance local biodiversity and ecological value of the area. In addition, the proposed treatment train approach is capable of improving surface water quality prior to discharge, thereby contributing to the protection and potential enhancement of the receiving water environment, including the River Mardyke catchment.

Neutral Impacts

6.9.17 There is no Neutral Impact in this location.

Negative Impacts

6.9.18 The site is intersected by an ordinary watercourse, identified as another tributary of the River Mardyke. Furthermore, the site is influenced by established overland surface water flow paths generally running from east to west. In addition, the site lies within an area identified as having a high susceptibility to groundwater flooding (with a 75% or greater probability).

6.9.19 During the construction phase, there is potential for significant impacts on these ordinary watercourses, groundwater and natural overland flow routes. Without appropriate mitigation, there is a significant increase in flood risk at the junction between Doesgate Lane and Lower Dunton Road as well as nearby Farms.

3. TB 240

Positive Impacts

6.9.20 The incorporation of SuDS within the development has the potential to enhance local biodiversity and ecological value of the area. In addition, the proposed treatment train approach is capable of improving surface water quality prior to discharge, thereby contributing to the protection and potential enhancement of the receiving water environment, including the River Mardyke catchment.

Neutral Impacts

6.9.21 There is no Neutral Impact in this location.

Negative Impacts

6.9.22 The site is intersected by established overland surface water flow paths. These flow routes originate from the Langdon Hills Golf Course and traverse through the site, interacting with the TB240 construction yard.

6.9.23 Any alteration, obstruction, or inappropriate diversions of these overland flow paths as part of the development could disrupt the natural conveyance of surface water and potentially increase the risk of surface water flooding to surrounding areas, including nearby agricultural land.

4. TB 245

Positive Impacts

6.9.24 The incorporation of SuDS within the development has the potential to enhance local biodiversity and ecological value of the area. In addition, the proposed treatment train approach can improve surface water quality prior to discharge, thereby contributing to the protection and potential enhancement of the receiving water environment, including the River Mardyke catchment.

Neutral Impacts

6.9.25 There is no Neutral Impact in this location.

Negative Impacts

6.9.26 The proposed pylons are not located within identified overland surface water flow paths. However, the proposed haulage roads and construction compounds are situated within areas intersected by established overland flow routes and are also located within Flood Zone 3.

6.9.27 The placement of these temporary construction features within overland flow routes has the potential to obstruct or alter natural surface water conveyance. This may increase the risk of surface water flooding upstream, particularly in the vicinity of Conway Road near Brentwood Road. In addition, any provision of culverts as part of the development has the potential for sediment mobilisation, or contamination. This adversely affects the quality of water conveyed along these flow paths, which will ultimately discharge into River Mardyke.

5. TB 250

Positive Impacts

6.9.28 The incorporation of SuDS within the development has the potential to enhance local biodiversity and ecological value of the area. In addition, the proposed treatment train approach can improve surface water quality prior to discharge, thereby contributing to the protection and potential enhancement of the receiving water environment, including the River Mardyke catchment.

Neutral Impacts

6.9.29 There is no significant impact on this location due to the surface water flooding, and it is not located in any of the flood zones.

Negative Impacts

6.9.30 There is no negative impact. However, adequate mitigation measures have to be put in place to counteract the impact on surface water flow path.

6. TB 255

Positive Impacts

6.9.31 The incorporation of SuDS within the development has the potential to enhance local biodiversity and ecological value of the area. In addition, the proposed treatment train approach can improve surface water quality prior to discharge, thereby contributing to the protection and potential enhancement of the receiving water environment, including the River Mardyke catchment.

Neutral Impacts

6.9.32 There is no Neutral Impact in this location.

Negative Impacts

6.9.33 Surface water flooding has been identified within this development site. Accordingly, appropriate mitigation measures must be implemented to manage and contain runoff generated from the construction compounds.

6.9.34 The Applicant must ensure that temporary drainage arrangements are designed to prevent uncontrolled discharge, ponding, or redirection of flows that could exacerbate flood risk. The construction phase strategy should demonstrate that runoff will be safely managed on-site and that there will be no increase in flood risk either within the site boundary or to surrounding land and infrastructure.

7. Tilbury Substation and surrounding locations

Positive Impacts

6.9.35 The incorporation of SuDS within the development has the potential to enhance local biodiversity and ecological value of the area. In addition, the proposed treatment train approach can improve surface water quality prior to discharge, thereby contributing to the protection and potential enhancement of the receiving water environment, including the River Mardyke catchment.

Neutral Impacts

6.9.36 There is no Neutral Impact in this location.

Negative Impacts

6.9.37 The proposed construction site layout is located within areas influenced by overland flow paths and surface water flood extents. As such, there is potential for the construction activities and associated infrastructure to obstruct natural flow routes and increase surface water flooding both within the site and to surrounding areas. This will increase the surface water flooding in the downstream region of Linford and East Tilbury Road and in the upstream region of Dock Approach Road and Brentwood Road.

6.9.38 Therefore, appropriate mitigation measures are implemented to ensure that surface water runoff generated within the construction compounds is effectively contained and managed.

Operational Phase

6.9.39 During the operational phase, the overall impacts can be summarised as follows:

Positive Impacts

6.9.40 The incorporation of SuDS within the development has the potential to enhance local biodiversity and ecological value of the area. In addition, the proposed treatment train approach can improve surface water quality prior to discharge, thereby contributing to the protection and potential enhancement of the receiving water environment, including the River Mardyke catchment.

Neutral Impacts

6.9.41 During the operational phase of the development, the overall impact on surface water and groundwater flood risk is broadly neutral, subject to appropriate design and mitigation measures being implemented.

6.9.42 The effective incorporation and long-term management of SuDS, in accordance with the overarching national policy (NPS EN-1) outlined above, will be more important in achieving this outcome. Provided that the drainage strategy is designed and delivered in line with policy requirements, and appropriate mitigation measures are secured, the proposed development has the potential to manage surface water runoff effectively and avoid any increase in flood risk both within the site and to neighbouring land.

Negative Impacts

6.9.43 There are no significant adverse impacts anticipated during operational phase of the development.

Decommissioning Phase

6.9.44 During the decommissioning phase, the overall impacts can be summarised as follows:

Positive Impacts

6.9.45 The decommissioning of the Project has the potential to result in positive flood risk management outcomes. Restoration of the land to its previous condition would enable the reestablishment of natural surface water flow paths and improve overland flow conveyance across the site. There is also potential for improving biodiversity in the area through environmental enhancement measures such as wetland creation.

6.9.46 This reinstatement of natural drainage patterns could reduce the risk of surface water accumulation and groundwater interaction, thereby minimising potential flood risk impacts to both the site and neighbouring land and also improve biodiversity.

Neutral Impacts

6.9.47 There is no neutral impact during the decommission stage of this development.

Negative Impacts

6.9.48 Negative impact can be neutralised by above mitigation measures. (See positive impact of decommissioning phase).

Required Mitigation

6.9.49 The following mitigation measures are recommended to address the flood risk impacts identified.

6.9.50 Crossing the Ordinary Watercourses - Where temporary or permanent structures are proposed to cross ordinary watercourses, the Applicant shall submit relevant documentation as part of the DCO protective provisions. This will help to safeguard the hydraulic function and structural integrity of the watercourse. This also shall be supported by detailed hydraulic assessments, method statements, and relevant technical documentation demonstrating that the proposed works will not increase flood risk within the site or to adjacent land. Additionally, provisions shall include mitigation for ecology hydrogeology and maintaining the flow regime. Special consideration shall be given to mitigation measures for vehicular movement along banks of watercourse.

6.9.51 Surface water flooding and Overland flow paths - The Applicant must provide an adequate drainage strategy to demonstrate how peak runoffs and volumes generated from the site will be managed within the site and to ensure there is no increase in flood risk on site or elsewhere.

6.9.52 If the site is affected by the overland flow paths, the Applicant will be required to fully assess these flow paths as part of their drainage strategy and site layout design. The drainage strategy should therefore include mitigation measures and design considerations to prevent any interception of these flow paths by the proposed structures, and to safeguard safe conveyance of surface water across the site without increasing the flood risk within the site or elsewhere.

6.9.53 Groundwater Flooding - Where the site is identified as being susceptible to groundwater emergence, appropriate mitigation measures must be incorporated. This may include temporary dewatering arrangements during construction, as well as long-term land drainage provisions to manage groundwater levels during the operational phase. The drainage design must demonstrate that groundwater will be safely controlled without causing instability, contamination, or increased flood risk elsewhere.

6.9.54 Flood Zone 2 and 3 - For any part of the development located within Flood Zones 2 or 3, a site-specific FRA must be submitted. The FRA shall demonstrate that the development will be safe for its lifetime, incorporate appropriate flood resilience and resistance measures, provide safe access and egress during flood events, and include suitable flood warning and emergency planning arrangements.

Cumulative Impact

6.9.55 Two principal cumulative flood risk impacts have been identified during both the construction and operational phases of the development:

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- 6.9.56 Cumulative Impact – Surface Water and Groundwater Flooding - In certain areas of the site, there is potential for interaction between surface water flooding and elevated groundwater levels. The combined effect of these mechanisms could exacerbate flood risk if not appropriately managed. The Applicant must therefore ensure that a detailed land drainage mitigation strategy including filter drains or porous land drainage pipes is implemented during both the construction and operational phases of the proposed development. This strategy should demonstrate how surface water runoff and groundwater emergence will be effectively controlled and managed to prevent any increase in flood risk within the site or to neighbouring land.
- 6.9.57 Cumulative Impact – LTC and Tilbury Substation - The proposed Tilbury Substation is located in proximity to, and partially intersects with, the Order Limits of the LTC development. This area is identified as being highly susceptible to surface water flooding and is influenced by established overland flow paths. The combined effects of these major infrastructure projects could alter existing drainage patterns and increase runoff volumes if not carefully coordinated.
- 6.9.58 The Applicant must therefore provide an integrated drainage strategy that considers cumulative impacts arising from both developments. The strategy must demonstrate that flood risk will not be increased within the site or elsewhere. Particular attention shall be given to potential downstream impacts to areas near Linford and East Tilbury Road, as well as upstream areas near Dock Approach Road and Brentwood Road, where alterations to surface water conveyance could result in increased flood risk.

Comments on Supporting Documents

- 6.9.59 The Applicant has submitted an ES in support of the proposal, prepared in accordance with the requirements of the Overarching NPS for Energy (EN-1) (December 2025). The submission addresses key flood risk considerations and outlines the proposed mitigation measures in line with the NPPF and the National SuDS Standards.
- 6.9.60 The ES demonstrates that the Applicant has considered the detailed flood risk mechanisms affecting the site. The proposed approach aligns with national policy objectives, seeking to ensure that the development will be safe for its lifetime and will not increase flood risk elsewhere.
- 6.9.61 A FRA has been provided as part the submission. However, further details on surface water drainage during construction and operation are expected to be submitted soon by NGET.

6.10 Emergency Planning

Summary

- 6.10.1 The proposed development is predominantly located within Flood Zone 1, which is at low risk of fluvial flooding. While some of the Project's Order Limits fall within Flood Zones 2 and 3, Section H (Thurrock) does not lie within these higher-risk zones. Despite this, it is important the applicant implements the mitigation measures for fluvial and surface water flooding as set out in the Outline CoCP FWEP and ensures that flood risk does not increase elsewhere as a result of the development in accordance with Policy EN-1.

National Policy Statements

6.10.2 At a national level, the following policy statement (and parts thereof) is particularly relevant to the consideration of the impact arising from the development scheme:

- Department for Energy Security & Net Zero, Overarching National Policy Statement for Energy (EN-1) (December 2025). This highlights the importance of ensuring the proposed development does not increase flood risk elsewhere and account for the predicted impacts of climate change on flood risk for the entire lifetime of the development.

National Policy/Guidance

6.10.3 Overarching Policy regarding the subject matter.

National Planning Policy Framework

6.10.4 Relevant NPPF Paragraphs regarding the subject matter.

Thurrock Core Strategy Local Plan

6.10.5 Relevant Local Core Strategy/Emerging Plan policies/Supplementary Planning Documents regarding the subject matter.

Local Impact Assessment

Construction Phase

Positive Impacts

6.10.6 N/A.

Neutral Impacts

6.10.7 N/A.

Negative Impacts

6.10.8 N/A.

Operational Phase

Positive Impacts

6.10.9 N/A.

Neutral Impacts

6.10.10 N/A.

Negative Impacts

6.10.11 N/A.

Decommissioning Phase

Positive Impacts

6.10.12 N/A

Neutral Impacts

6.10.13 N/A.

Negative Impacts

6.10.14 N/A.

Required Mitigation

6.10.15 Although Section H (Thurrock) lies within Flood Zone 1 of the Project, Thurrock Council stresses the flood warning and evacuation procedures for Flood Zones 2 and 3 as outlined in the Outline Code of Construction Practice (CoCP) must be followed and implemented for the rest of the proposed development. For instance, prior to construction works commencing and to reduce the risk of flooding within Section H (Thurrock), appropriate site drainage must be put into place and temporary construction haul roads must be resiliently designed such as using suitable geo-textiles.

6.10.16 The flood warning and evacuation procedures for surface water flooding outlined the Outline CoCP Flood Warning and Evacuation Plan (FWEP) must be followed. This includes ensuring that worksites at risk of flooding have equipment and hazardous materials are either moved to higher ground or protected or securely covered and ensure on-site personnel are moved to higher ground.

6.10.17 Additionally, as explained in Section 10 of the Outline CoCP, it is the responsibility of the applicant to ensure the Main Works Contractor(s) ensure that all construction workers, contractors and on-site personnel receive appropriate training, adopt and implement the FWEP.

Cumulative Impact

6.10.18 N/A.

Comments on Supporting Documents

6.10.19 N/A.

6.11 Climate Change

Summary

6.11.1 The Council gives significant weight to the benefits for climate change mitigation and reaching net zero of increasing Thurrock's access to renewable energy. The greenhouse gas ("GHG") assessment is considered robust, and significant impact on local emissions is not anticipated.

6.11.2 The Council identifies the potential for cumulative impact of the proposal in combination with other similar projects to be significant in increasing GHG emissions. The Council also identifies the potential for the project to worsen flood risk in the Borough, which will be exaggerated by climate change.

National Policy Statements

6.11.3 NPS EN-1 states that all proposals for energy infrastructure projects should include a GHG assessment as part of their ES and gives detail as to what the GHG assessment should include. The GHG assessment submitted as appendix 4.1 to the ES meets these requirements.

National Policy/Guidance

6.11.4 PAS 2080: 2023 Carbon Management in Infrastructure and Built Environment is a global standard for managing infrastructure carbon. Section 3.2 of the submitted GHG assessment details the Project's commitment to the PAS 2080: 2023 standard and to the use of a recognised carbon hierarchy, contractor baseline ("CIT") and embodied carbon calculations.

National Planning Policy Framework

6.11.5 Paragraph 168 of the NPPF (2024) states that when determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future.

Thurrock Core Strategy Local Plan

6.11.6 CSTP25 – Addressing Climate Change requires that new development considers climate change adaptation measures, including the impact of development on flood risk from tidal, fluvial and surface water. The policy also requires new development and associated activities to adhere to local, regional and national targets for reducing carbon emissions.

6.11.7 CSTP26 – Renewable or Low-Carbon Energy Generation outlines a need to increase renewable or low-carbon energy generation within Thurrock.

Local Impact Assessment

Construction Phase

Positive Impacts

6.11.8 No positive impacts identified.

Neutral Impacts

6.11.9 No neutral impacts identified.

Negative Impacts

6.11.10 The LLFA section of this LIR identifies potential for the construction phase to have significant impacts on the ordinary watercourses, groundwater and natural overland flow routes near the Tilbury North

substation site. Without appropriate mitigation, works could lead to obstruction, diversion, sediment mobilisation, or alteration of flow regimes. This can lead to surface water flooding in the upstream solar farms and nearby facilities, and groundwater flooding within the development. These potential flooding implications will likely be worsened by climate change. In line with paragraph 4.10.8 of NPS EN-1, applicants must consider the direct and indirect impacts of climate change – including flood risk – when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure.

Operational Phase

Positive Impacts

6.11.11 The Council's Core Strategy Local Plan policy CSTP26 outlines a need to increase renewable energy generation in Thurrock. The Project will not increase renewable energy generation in the borough, but it will increase the amount of renewable energy delivered to Thurrock from offshore wind generators in Norfolk, enabling Thurrock's residents and industries to use more renewable energy. Paragraph 168 of the NPPF (2024) says that local planning authorities should give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future.

Neutral Impacts

6.11.12 No neutral impacts identified.

Negative Impacts

6.11.13 Emissions associated with repair and replacement of assets during the Project lifetime and with operation of infrastructure associated with the Project are considered within the scope of the GHG reduction strategy, as outlined in Table 3.1 of Appendix H to the OCoCP. Section 5.1.4 of the GHG reduction strategy states that GHG calculations would be quantified at the end of each stage of infrastructure delivery (i.e., design stage, construction stage), to monitor emissions and reductions achieved. Whilst operational emissions are scoped into the strategy, it is not clear that they will continue to be monitored and minimised for the lifespan of the infrastructure.

Decommissioning Phase

Positive Impacts

6.11.14 No positive impacts identified.

Neutral Impacts

6.11.15 No neutral impacts identified.

Negative Impacts

6.11.16 No negative impacts identified.

Required Mitigation

6.11.17 There is a need for clear enforceable requirements (through the DCO) to secure local mitigation measures, monitoring and reporting of carbon performance within the borough. This is especially important because, as this is a NSIP, local control over many design and operational aspects is limited.

6.11.18 There is a need to monitor and minimise GHG emissions from the electrical infrastructure and maintenance activities over the project's lifespan, to ensure GHG emissions remain low beyond the construction phase.

6.11.19 There is also a need for mitigation to prevent flooding, including the following mitigation measures at set out in the LLFA section of this LIR:

1. Crossing the ordinary watercourses
2. Surface water flooding and overland flow paths
3. Groundwater flooding
4. Flood zone 2 and 3

Cumulative Impact

6.11.20 As with all projects of this scale, the GHG assessment concludes that the Project's emissions are not material in isolation. However, the Council remains concerned about the cumulative effect of multiple similar scale projects across the country. NPS EN-1 recognises that clustering and "in-combination" effects should be considered. The Council would therefore welcome consideration of how this Project interfaces with the wider national programme of infrastructure developments in terms of cumulative embodied emissions and the monitoring of cumulative outcomes over time.

6.12 Community Development

Summary

6.12.1 The Council considered potential temporary adverse impacts for some communities during the construction phase of the Project, particularly in relation to wellbeing and mental health.

6.12.2 The Council has considered impacts that are most likely to affect residential communities, including children, families, older people and residents with disabilities and long-term health conditions.

6.12.3 Whilst there may be short term benefits, such as employment and social value for example, these are limited in duration and unlikely to offset the scale of disruption.

National Policy Statements

6.12.4 National Policy recognises that the construction, operation and decommissioning of energy infrastructure projects can lead to socio-economic impacts, including effects on local communities and vulnerable groups.

National Policy Guidance

6.12.5 The Council considers the need to have due regard to the Public Sector Equality Duty under the Equality Act 2010.

National Planning Policy Framework

6.12.6 N/A

Thurrock Core Strategy Local Plan

6.12.7 N/A

Other Relevant Policy

6.12.8 N/A

Local Impact Assessment

Positive Impacts

6.12.9 The Council acknowledges the potential for short-term employment and supply chain opportunities.

6.12.10 The Council acknowledges opportunities for community benefit linked to construction contracts.

Neutral Impacts

6.12.11 The Council considers that some construction activities may have neutral impact depending on location and timing.

Negative Impacts

6.12.12 The Council considers the following are negative impacts of the proposal:

- Prolonged construction, uncertainty around timescales and proximity may negatively affect wellbeing and mental health.
- Potential for disproportionate impacts on children, families, older people and disabled residents, especially where access is affected, noise is prolonged, or disruption contributes to mental wellbeing.
- Concerns have been raised around adverse effects on local character, sense of place and community cohesion.

Operational Phase Impacts

Positive Impacts

6.12.13 The Council considers potential benefits linked to energy resilience.

Neutral Impacts

6.12.14 N/A

Negative Impacts

6.12.15 Ongoing visual and environmental impact affecting wellbeing and perceptions of place in some parts of the Borough.

Decommissioning Phase

Positive Impacts

6.12.16 N/A

Neutral Impacts

6.12.17 N/A

Negative Impacts

6.12.18 The proposals could result in temporary disruption, particularly if it overlaps with other major infrastructure schemes.

Required Mitigation

6.12.19 The Council has no detailed mitigation developed at this stage. Co-ordination with other infrastructure activity is important.

Cumulative Impacts

6.12.20 The Council considers the following cumulative impacts:

6.12.21 Concerns have been raised regarding cumulative impacts arising from the project alongside other major infrastructure projects in the area e.g. Lower LTC.

6.12.22 Overlapping construction activity may increase disruption and place additional pressures on local infrastructure and communities.

Comments on Supporting Documents

6.12.23 N/A

6.13 Waste and Recycling

Summary

6.13.1 The Project is expected to have a positive impact during the construction and decommissioning phases. During these phases there is potential for there to be high levels of recycling and re-use of metals and materials and potential use of local waste facilities and suppliers. Thus, supporting local employment, local businesses and circular economy objectives.

6.13.2 With the compulsory purchase of the Linford HWRC, it is expected there would be significant negative impacts on the only HWRC the council operates. During the construction and decommissioning phases, the Project could potentially create temporary traffic and access disruption that would have knock on effects on waste collection rounds and resident access to collection points. This would potentially

impede the council's role as a Waste and Collection Authority. During the operational phase, as part of the land acquisition, NGET is proposing a permanent access route which cuts across the public access into the recycling centre. This would constrain access to the site and potentially increase already existing traffic on Buckingham Hill Road through a build-up of vehicles waiting to enter the HWRC as the road only travels north.

6.13.3 It is important the Project does not impede the HWRC's ability to operate especially as it is the only one the council operates. NGET should ensure the required mitigation measures proposed are implemented by the Contractor to ensure smooth service continuity and access. Also, NGET should ensure there is a clear communication process in place to update residents on the status and management of the waste service and traffic in the area.

National Policy Statements

6.13.4 The following NPSs are considered relevant:

- Environmental Protection Act 1990 – statutory duties around household waste collection, disposal and the waste 'duty of care'.
- The Waste (England and Wales) Regulations 2011 – embeds the waste hierarchy (prevention → reuse → recycling → recovery → disposal).
- Environmental Act 2021 and related 'Simpler Recycling' reforms – increasing requirements on collection consistency and recycling performance.
- Resources and Waste Strategy for England (2018) – moves towards a more circular economy and reduced residual waste.
- Overarching NPS for Energy (EN-1, December 2025) – Section 5.15 'Resource and Waste Management' (paragraphs 187–191) sets expectations on applying the waste hierarchy, aligning with circular economy objectives, producing a waste/resource management report/plan, and assessing impacts on local waste management capacity across construction, operation and decommissioning.
- NPS for Electricity Networks Infrastructure (EN-5, 2023) (read alongside EN-1) – relevant to assessing the Norwich to Tilbury electricity network proposal.

National Policy/Guidance

- National Planning Policy for Waste (2014) – encourages sustainable management of waste in non-waste development (e.g. adequate storage/collection arrangements and applying the waste hierarchy).

National Planning Policy Framework

6.13.5 NA.

Thurrock Core Strategy Local Plan

6.13.6 Thurrock Core Strategy and Policies for Management of Development (as amended), adopted January 2015:

- CSTP29 Waste Strategy: drive waste management up the waste hierarchy, require major developments to minimise waste at source and make provision for waste reduction/recycling/management.
- CSTP30 Regional Waste Apportionment: approach to managing residual London imports and safeguarding capacity for Thurrock's needs.

6.13.7 Thurrock Council Municipal Waste Strategy 2021–2031 (updated July 2024): sets ambitions for reducing waste, maximising recycling/re-use, reducing carbon, and maintaining reliable collection services (including the 2024 service changes and food waste roll-out).

Local Impact Assessment

Construction Phase

Positive Impacts

6.13.8 Opportunity to maximise reuse/recycling of excavated materials and construction waste (supporting circular economy objectives).

6.13.9 Potential for use of local/permitted waste facilities and suppliers, supporting local employment and reducing transport miles.

Neutral Impacts

6.13.10 If contractor waste is managed entirely through licenced arrangements, there should be limited direct interaction with TCs household waste services.

Negative Impacts

6.13.11 Traffic management, temporary road closures, narrowed carriageways, or parking suspensions may obstruct refuse collection vehicles ("RCVs") and/or access to bin stores, leading to missed/late collections and service reliability impacts.

6.13.12 Increased HGV movements may coincide with collection rounds, increasing safety risks for crews and residents and potentially requiring route changes.

6.13.13 Construction compounds/welfare facilities will generate commercial-type wastes (general waste, recyclables, food waste). If not managed robustly, there is a risk of inappropriate disposal via household bins/HWRCs.

6.13.14 Increased fly-tipping/litter risk around worksites, haul routes and temporary laydown areas if waste is not securely stored/removed.

6.13.15 Potential for contaminated soils/spoil and other hazardous wastes to arise; incorrect classification/handling could create environmental and reputational risks for the area.

Operational Phase

Positive Impacts

6.13.16 No direct positive impacts on the Council's waste service are anticipated during routine operation.

Neutral Impacts

6.13.17 Day to-day operational waste generation should be low (e.g. small quantities from inspections/maintenance) and managed through the operator's commercial waste arrangements.

Negative Impacts

6.13.18 Periodic maintenance activities may require temporary access restrictions/traffic management which, if not coordinated, could affect collections on specific days/routes.

6.13.19 Any long-term restrictions on access tracks/land parcels could (in some locations) reduce flexibility for future routing or siting of waste infrastructure, depending on final land arrangements.

Decommissioning Phase

Positive Impacts

6.13.20 Potential for high levels of recycling/re-use of metals and materials (e.g. conductors/steelwork), aligning with circular economy objectives.

Neutral Impacts

6.13.21 If decommissioning waste is managed via licensed commercial arrangements and traffic impacts are controlled, direct impacts on the Council's services should be limited.

Negative Impacts

6.13.22 Similar to construction, decommissioning could create temporary traffic/access disruption that affects waste collection rounds and resident access to collection points.

6.13.23 Risk of increased waste arisings (including potentially hazardous components) requiring robust segregation, storage and disposal arrangements.

Required Mitigation

6.13.24 The following mitigation measures are recommended:

6.13.25 Service continuity/access:

- Require the contractor to liaise with the Council's Waste & Recycling Service ahead of, and throughout, works to ensure household and trade waste collections can continue safely and reliably.
- CTMPs must explicitly consider RCV access (widths/turning, swept paths, stopping points, overhead clearances, safe passing places) and protect access to bin stores/communal collection points.

-
- Where temporary restrictions are unavoidable on scheduled collection days, agree alternative arrangements in advance (temporary collection points, assisted collections, re-scheduled rounds) and ensure any additional council costs are reimbursed.

6.13.26 Waste Management (contractor):

- Secure a detailed Site Waste Management Plan ("SWMP") / Resource & Waste Management Plan in line with NPS EN-1 Section 5.15, including: forecast waste arisings; segregation; re-use/recycling targets; licensed carriers; permitted destinations; duty-of-care paperwork; and procedures for hazardous waste and contaminated soils.
- Explicitly prohibit disposal of construction/compound wastes through household collections or HWRCs.
- Provide sufficient bins/skips within compounds and ensure regular collections to avoid overflow, littering and vermin.

6.13.27 Community/place impacts:

- Clear advance communications to residents/businesses where traffic management may affect access to bins/collection points.
- Fly-tipping and litter prevention measures (secure storage, rapid clearance, monitoring of hotspots, enforcement support where appropriate).

6.13.28 Governance:

- Provide a single point of contact for the waste service and require periodic review/update of waste plans (particularly where programme changes).

Cumulative Impact

6.13.29 Thurrock is experiencing multiple concurrent infrastructure and development programmes. If Norwich to Tilbury construction traffic management overlaps with other major roadworks/projects, cumulative access disruption could materially affect collection round efficiency, reliability and crew safety.

6.13.30 The Council has recently implemented service changes (alternate-weekly residual/recycling collections and food waste roll-out). During this transition period, additional disruption increases the risk of missed collections and reduced public confidence.

6.13.31 Cumulative demand from multiple construction projects on local waste management infrastructure (transfer, treatment and disposal) could lead to longer haul distances, higher carbon emissions and higher costs, unless capacity and logistics are planned and evidenced.

Comments on Supporting Documents

6.13.32 The Council make the following comments on Supporting Documents

6.13.33 In terms of the OCoCP:

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- The document should include a clear commitment that traffic management and work programming will maintain access for statutory services, including refuse collections, and set out how this will be secured through detailed CTMPs and liaison.

6.13.34 In terms of the Outline SWMP/waste appendix:

- The document should clearly quantify forecast waste arisings (by type), set out the waste hierarchy approach, and identify intended permitted destinations.
- The document should demonstrate that waste arisings will not adversely affect local waste management capacity and provide assurance on arrangements for at least the early operational period, in line with EN-1 expectations.
- The document should clearly address hazardous waste and contaminated soils/spoil (classification, storage, transfer notes/consignment notes, permitted facilities).

6.13.35 In terms of the Outline Construction Traffic Management Plan:

- The document should explicitly reference RCVs and set minimum requirements for access, stopping/servicing space, and coordination of temporary restrictions.
- The document should commit to early notice periods to the council for road closures/parking suspensions and provide escalation routes for urgent service issues.

6.13.36 In terms of the ES/assessments (where relevant):

- The document should ensure waste effects are assessed for construction, operation and decommissioning, including the carbon implications of waste transport and destinations.

6.14 Recreation and Leisure

Summary

- 6.14.1 The Project will create temporary disruption to parks, open spaces, playing fields and PRow in Thurrock during construction. This includes short term diversions, reduced amenity, and impacts from construction noise, dust and vehicle movements. No direct loss of built leisure centres is expected.
- 6.14.2 There may be temporary effects on community sport and outdoor events, depending on the timing and location of works. Access to open spaces may feel less attractive or be restricted at certain times.
- 6.14.3 During operation, the main impact is visual change from new pylons, which may alter how some open spaces or walking routes are experienced. Day to day recreational use is expected to continue.
- 6.14.4 During decommissioning, impacts are again temporary and similar to construction but on a smaller scale.
- 6.14.5 There are positive opportunities through reinstatement and improvements to PRow, paths and green links once works are completed. These can help strengthen access to recreation and support long term community use of open spaces.

National Policy Statements

6.14.6 This section of the LIR has been prepared with regard to the Overarching NPS for Energy (EN-1), including: the role of Local Impact Reports in decision-making (EN-1 para 1.1.3); the assessment principles for health, socio-economics, land use and open space, and recreation (Part 4 and Part 5); and the recognition that nationally significant electricity networks are urgently needed (Part 3) while requiring proportionate, focused assessments and mitigation (Section 4).

6.14.7 Overarching NPS EN-1 requires Local Impact Reports to identify how nationally significant energy projects may affect local communities, including recreation, open space, access and health. It recognises that temporary disruption can occur during construction but expects impacts to be minimised and mitigated following clear assessment principles on population, health, land use and amenity.

National Policy/Guidance

National Planning Policy Framework

6.14.8 Relevant NPPF 2024 sections include: Section 8 – Promoting healthy and safe communities (paras 96–108), which supports planning for social, recreational and cultural facilities and guarding against the unnecessary loss of valued community facilities; Section 9 – Promoting sustainable transport; Section 14 – Meeting the challenge of climate change, flooding and coastal change; and Section 15 – Conserving and enhancing the natural environment. In particular, the NPPF emphasises protecting valued recreational spaces, promoting healthy and safe communities, and ensuring developments do not lead to the unnecessary loss of community, sport or leisure facilities (Section 8, paragraphs 96–108). It also requires planning to support active travel and high-quality green environments.

Thurrock Core Strategy Local Plan

6.14.9 Key policies include: CSTP9 (Well-being: Leisure and Sports) – safeguarding and improving leisure and sports facilities, requiring developer contributions, and promoting accessibility; and CSTP20 (Open Space) – ensuring a diverse range of accessible public open spaces, addressing identified deficiencies, multi-functional design, and pursuit of Green Flag standards.

6.14.10 Policies CSTP9 and CSTP20 safeguard leisure and sports facilities, require high quality and accessible open spaces, and support healthy, active lifestyles through well connected green infrastructure

Local Impact Assessment

Construction Phase

Positive Impacts

6.14.11 There is a possibility that time-limited employment and local supply-chain opportunities that can support participation initiatives can arise in nearby leisure facilities during construction, however an employee training and skills plan has not been submitted to enable the council to consider this.

6.14.12 Potential for early investment in temporary or permanent improvements to PRowS, greenways and access to open spaces as part of haul road rationalisation and reinstatement plans, improving active travel to parks and leisure sites

Neutral Impacts

6.14.13 No direct loss of Council-operated built leisure centres is anticipated from the overhead line ("OHL") works in Thurrock; temporary effects are primarily related to access management and amenity rather than facility closure.

Negative Impacts

6.14.14 Temporary disruption to access and amenity for users of parks, open spaces, playing fields and PRoW within construction corridors, including noise, dust and visual intrusion.

6.14.15 Temporary severance or diversion of recreational routes (e.g., Thames pathways, bridleways and local green links) affecting active travel and community sport participation.

6.14.16 Short-term displacement of programmed community events and informal recreation in affected open spaces, with potential income loss to clubs and concessionaires.

6.14.17 Construction traffic increasing perceived and actual risk for pedestrians and cyclists near site accesses; reduced attractiveness of active travel.

Operational Phase

Positive Impacts

6.14.18 Enhanced grid capacity enabling decarbonisation aligns with corporate health and wellbeing outcomes, indirectly supporting increased electrified, low-emission transport and cleaner air for outdoor recreation.

6.14.19 Opportunities to formalise permissive paths beneath OHL wayleaves and improve connectivity to the Tilbury North Substation area as part of landscaping and aftercare.

Neutral Impacts

6.14.20 Routine operation is unlikely to materially affect usage of leisure facilities, with intermittent maintenance causing only occasional, managed disruption.

Negative Impacts

6.14.21 Long-term landscape and visual change from new pylons may reduce perceived quality of certain open spaces and routes; potential sensitivity for programmed events and club activities where setting is important.

Decommissioning Phase

Positive Impacts

6.14.22 Scope to restore land, reinstate and upgrade PRoW and habitat connectivity; lessons learned can embed higher quality green infrastructure.

Neutral Impacts

6.14.23 Short duration and planned communication should keep disruption comparable to minor works.

Negative Impacts

6.14.24 Temporary access restrictions and disturbance similar to construction without adequate phasing and stakeholder coordination.

Required Mitigation

6.14.25 The following mitigation is requested:

- A Recreation & Leisure Management Plan ("RLMP") agreed with the Council and Public Health, setting out protection of parks/open spaces, event scheduling, and communications.
- PRoW, bridleway and active travel mitigation: protect, phase and sign diversions; deliver like-for-like or better surfacing, lighting (where appropriate), accessible gradients and furniture on reinstatement.
- Open space protection and reinstatement: pre-condition surveys; avoid peak sport seasons; reinstate pitches to Sport England/NGB standards; compensate any temporary loss of usable pitch capacity.
- Community access: maintain safe, signed access to key leisure assets and riverside spaces; provide construction traffic marshals near schools, parks and leisure sites.
- Amenity management: apply best practicable means for noise/dust; schedule high impact works outside programmed events; temporary screening where feasible.
- Legacy enhancements: fund targeted Green Grid links and wayfinding to connect South Ockendon, Tilbury and Chadwell St Mary to parks and riverside; small grants for community activation when routes reopen.
- Employee training and skills plan to be submitted by the Applicant to ensure local residents can be upskilled and employed as a result of this scheme.

Cumulative Impact

6.14.26 Cumulative effects may arise with concurrent infrastructure such as LTC and local housing/employment sites. The combined construction traffic, land-take and access management could intensify recreational severance and amenity effects. Coordinated scheduling, shared PRoW diversions, and integrated communications across promoters are essential.

Comments on Supporting Documents

6.14.27 The submitted documents identify key open spaces and PRoW in Thurrock, but the assessment of Recreation and Leisure is high level and not presented as a separate, detailed topic.

6.14.28 There is not a clear explanation as to how construction will affect everyday use of parks, playing fields or community activities, which makes it difficult to confirm alignment with NPPF requirements to protect valued recreational spaces.

6.14.29 There is also not a clear, specific mitigation for recreation and leisure, so it is not possible to confirm whether the proposals meet Thurrock Core Strategy policies CSTP9 and CSTP20 on safeguarding leisure and open space.

6.14.30 In summary, the documents acknowledge the right areas, but do not yet show enough detail to demonstrate how recreation and leisure impacts in Thurrock will be fully managed.

6.15 Local Plan

Summary

6.15.1 The Council is currently preparing a new Local Plan for Thurrock. This includes identification of sites for new a significant amount of new development over the Plan Period to 2044. Following a call-for-sites and site assessment process, the Council is now finalising the list of sites to be included in the Local Plan as site allocations. As this has not yet drawn to a close it is unable to robustly and publicly provide information about sites being promoted for development that will be included in the Local Plan as Site Allocations. However, it is likely that a small number of sites would be impacted. The most likely impact from the consenting of this scheme for those sites, would be to delay delivery of development in those locations until after construction and return of site being utilised temporarily. The effect of this would be to make it more difficult for the Council to meet its Local Plan housing target within the critical first five years of the plan period. The severity of this impact is currently difficult to quantify at his stage of the Plan Making Process. Once the draft Local Plan has been published for consultation in the spring of 2026, the impact is likely to be clearer.

National Policy Statements

6.15.2 Overarching Policy Statements regarding the subject matter.

National Policy/Guidance

6.15.3 Overarching Policy regarding the subject matter.

National Planning Policy Framework

6.15.4 The NPPF as a whole is relevant to the Local Plan. Section 3 of the NPPF sets out clear expectations of how local plans must integrate national policies, and strategic policies for infrastructure provision and thus must sit coherently alongside NSIPs.

6.15.5 In particular, paragraphs 61 to 81 of the NPPF on 'Delivering a Sufficient Supply of Homes' are crucial, as they set out the need to identify and meet housing requirements, maintain an adequate supply of developable land and support the Government's objective of significantly boosting housing delivery. Therefore, the proposed development must ensure it does not impede the Council's ability to deliver planned housing growth.

6.15.6 This includes addressing and mitigating impacts on key policy areas central to the Local Plan including the natural environment, climate change, transport, visual and landscape character and the Green Belt. These policy areas have significant considerations within the NPPF and are essential to achieving a sound, deliverable Local Plan.

Thurrock Core Strategy Local Plan

6.15.7 Relevant Local Core Strategy / Emerging Plan policies / Supplementary Planning Documents regarding the subject matter.

6.16 Archaeology (section written in December 2025)

Summary

6.16.1 The scope of this response is limited to assessing the archaeological impacts of the proposal in Essex and within the Colchester, Tendring, Chelmsford, Basildon, Brentwood and Thurrock planning authority areas.

Legislation

6.16.2 The following are considered of relevance.

- Planning Act 2008
- Electricity Act 1989
- The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017
- Countryside and Rights of Way Act 2000 as amended by the Levelling-Up and Regeneration Act 2023
- The Conservation of Habitats and Species Regulations 2017
- Environmental Act 2021
- Natural Environment and Rural Communities (NERC) Act 2006
- Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

National Policy Statements/Guidance

6.16.3 The following NPSs are considered of relevance in terms of Archaeology:

6.16.4 NPS (EN-1) is the overarching NPS for energy and was published in November 2023 and updated in January 2024. This sets out the UK Government's commitment to increasing renewable generation capacity and recognises that in the short to medium term, much of the new capacity is likely to come from onshore and onshore wind.

6.16.5 NPS (EN-3) is the UK Government's strategy for renewable energy infrastructure.

6.16.6 NPS (EN-5) is the UK Government's strategy for electricity networks infrastructure. This NPS applies to not only transmission systems but also associated infrastructure such as substations and converter stations. This NPS sets out the general principles that should be applied in the assessment of development consent application across the range of energy technologies.

2025 Revisions to National Policy Statements

6.16.7 In April 2025, the government launched a consultation on proposed changes to EN-1, EN-3 and EN-5 that ended on 29 May 2025. The consultation covers updates to all three NPSs for new energy infrastructure:

- Draft: Overarching National Policy Statement for Energy (EN-1) (DESNZ, 2025a)
- Draft: National Policy Statement for Electricity Networks Infrastructure (EN-5) (DESNZ, 2025b)

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- Draft: National Policy Statement for Renewable Energy Infrastructure (EN-3) (DESNZ, 2025c).

6.16.8 Changes consulted upon in the draft 2025 updates to the energy infrastructure NPSs include alignment with Clean Power 2030 targets and endorsement of the Centralised Strategic Network Plan. The 2025 revisions have strengthened the process for delivering major new infrastructure, reinforcing the Government's ambition to deliver clean power by 2030.

6.16.9 The transitional provisions on the status of the 2025 revisions say:

'While the review is undertaken, the current suite of energy NPS remain relevant government policy and EN-1 to EN05 have effect for the purposes of the Planning Act 2008. The Secretary of State has decided that for any application accepted for examination before amending the energy NPSs, the current suite of energy NPS, published in 2024, should have effect. The amended energy NPSs will therefore only have effect in relation to those applications for development consent accepted for examination after the publication of the final amended energy NPSs. However, any emerging draft energy NPSs (or those amended but not having effect) are potentially capable of being important and relevant considerations in the decision-making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework of the Planning Act 2008 and with regard to the specific circumstances of each development consent order application'.

6.16.10 At the point of submission of the Project, the NPSs designated in January 2024 were Government policy. The DCO application is accompanied by the ES (Document 6.1 to 6.18) which provides the final assessment of the likely significant effects, associated with the Project during its construction and operation (including maintenance), after the mitigation hierarchy has been applied. The ES was prepared in accordance with the relevant requirements of NPS EN-1 and EN-5 in force as of 1 April 2025.

6.16.11 The emerging draft of the Overarching NPS for Energy (EN-1) reinforces the approach taken in the ES. The draft revised EN-1 and EN-5 reiterate the government's commitment to the Clean Power Action Plan 2030, which aims for at least 95% of the UK's electricity generation to come from clean sources by 2030 and emphasises the urgency and critical national priority ("CNP") of developing low-carbon infrastructure, thereby supporting the need case established in the ES.

6.16.12 The draft revised EN-1 and EN-5 maintain the assessment principles and generic impact considerations outlined in the current EN-1 and EN-5, ensuring continuity in evaluating environmental effects. They also introduce enhanced guidance on biodiversity, flood risk, and climate resilience and the mitigation hierarchy. The ES is considered to be in compliance with these emerging draft NPSs.

6.16.13 If the revised NPSs are designated prior to a decision being made on the application for development consent, the ES and Planning Statement would be reviewed for consistency with the newly designated NPSs, and any additional requirements would be captured within an errata document post submission. It was confirmed in Section 51 of the Planning Act 2008 that if the new NPSs are adopted after the application has been submitted, the ExA can issue procedural decisions to ask all parties for views on the impacts of new NPSs.

Statutory Guidance

6.16.14 In April 2024, the Ministry of Housing, Communities and Local Government (2024) published an updated statutory guidance document on the pre-application stage for NGET | August 2025 | Norwich to Tilbury 24 NSIPs. While statutory requirements for consultation are provided in the Planning Act 2008, the purpose of the guidance is to:

- Advise all those likely to be involved in the pre-application stage of NSIPs about the processes.
- Guide applicants (and potential applicants) as to how the pre-application requirements of the 2008 Act (as amended) should be met and provide advice on good practice to seek continuous improvement in the quality of applications.
- Guide applicants (and potential applicants) as to how the pre-application requirements of the EIA Regulations should be met.
- Inform the main participants in National Infrastructure Planning, including the Inspectorate and consultees such as statutory bodies and local authorities, of their roles in the pre-application process, and ensure that they are clear what is expected of them.
- Provide advice on what is expected of an application for development consent to enable it to be accepted for examination.
- Help ensure that the pre-application process is transparent and accessible to all.

Non-Statutory Guidance

Planning Inspectorate Advice Pages:

6.16.15 The Inspectorate has published a series of non-statutory advice pages to inform developers, consultees, the public and other interested parties about a range of procedural matters in relation to the 2008 Act process. Not all these advice pages are applicable to the ES (Volume 6 of the DCO application), although those that are integral, and have informed the environmental assessment process for the Project, are discussed further below:

- Advice Note Seven: Environmental Impact Assessment ("EIA"): process, preliminary environmental information and environmental statements (Planning Inspectorate, 2025a) detail the procedural requirements that apply to NSIPs which are EIA development and provides clarity on its role and purpose
- Advice Note Nine: Rochdale Envelope (Planning Inspectorate, 2025b) provides guidance on the use of the 'Rochdale Envelope', a term used to describe those elements of a project that have not yet been finalised but can be constrained within certain limits and parameters hence allowing a determination of likely significant effects to be presented in the ES. When using the Rochdale Envelope to apply for flexibility within a DCO application, the developer should use a worst-case approach to identifying likely significant effects and should incorporate mitigation accordingly within the parameters of their scheme. Greater information is included within ES Chapter 4: Project Description (Document 6.4) on how NGET intends to make use of the Rochdale Envelope in the consenting process for the Project.
- Advice on Cumulative Effects Assessment (Planning Inspectorate, 2025c) sets out the recommended approach to Cumulative Effects Assessment for NSIPs including guidance on the

relative weight to be applied to other developments depending upon how progressed they are through the consenting process. Greater information on the Cumulative Effects assessment for the Project is included within Chapter 17: Cumulative Effects (Document 6.17)

- Advice on the Water Framework Directive (Planning Inspectorate, 2025d) sets out the approach to coordinating the requirements of the Water Framework Directive with the EIA process. Greater information is included within Chapter 12: Hydrology, Land Drainage and Flood Risk (Document 6.12)
- Advice on Transboundary Impacts and Process (Planning Inspectorate, 2025e) explains the roles and responsibilities of the SoS, the Inspectorate, European Economic Area Member States, and applicants applicable under Regulation 32 of the EIA Regulations
- Advice on Habitats Regulations Assessments (Planning Inspectorate, 2025f) provides advice for applicants in relation to the Habitats Regulations. It identifies the stages of the Habitats Regulations Assessment process and clarifies the information to be provided with a DCO application with respect to Habitats Regulations Assessment at each stage of the 2008 Act process.

National Grid Policy and Guidance

6.16.16 NGET has its own policies and processes that are followed when developing projects. The policies that are applicable to the Project are as follows:

- Our Approach to Options Appraisal (National Grid, 2012): This document describes the options appraisal process that is followed when developing new gas and electricity infrastructure projects. It follows a staged approach to the assessment and sets out the considerations when making decisions as to which option should be taken forward.
- Our Stakeholder, Community and Amenity Policy (National Grid, 2016): This document describes the 10 commitments that NGET has made to the way that electricity and gas works are carried out in the UK. This includes setting out how NGET would meet its amenity responsibilities and how stakeholders and communities are involved on projects.
- Our Approach to Consenting (National Grid, 2022): This document outlines NGET's approach to developing and delivering new infrastructure and applies to projects across its whole regulated electricity transmission business.
- NGET also has an extensive range of process and guidance documents that govern how projects are designed and implemented to ensure operational safety.

Holford Rules

6.16.17 Guidelines on overhead line routeing were first formulated in 1959 by Sir William, later Lord, Holford, as advisor to the Central Electricity Generating Board. Holford developed a series of planning guidelines in relation to amenity issues, that have subsequently become known as the 'Holford Rules' (National Grid, n.d.) and remain a valuable tool in selecting and assessing potential overhead line route options as part of the options appraisal process. A summary of the Holford Rules can be found in Table 2.2. These have been an important consideration during the development of the Project and whether certain

sections should be considered for undergrounding. The Holford Rules are also expressly considered as part of EN-5. The principles of the Holford Rules are being applied to the Project.

Summary of Holford Rules:

- 6.16.18 Rule 1 Avoid altogether, if possible, the major areas of highest amenity value, by so planning the general route of the first line in the first place, even if the total mileage is increased in consequence.
- 6.16.19 Rule 2 Avoid smaller areas of high amenity value, or scientific interests by deviation; provided that this can be done without using too many angle towers, i.e. the more massive structures which are used when lines change direction.
- 6.16.20 Rule 3 Other things being equal, choose the most direct line, with no sharp changes of direction and thus with fewer angle towers.
- 6.16.21 Rule 4 Choose tree and hill backgrounds in preference to sky backgrounds wherever possible; and when the line has to cross a ridge, secure this opaque background as long as possible and cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees.
- 6.16.22 Rule 5 Prefer moderately open valleys with woods where the apparent height of towers will be reduced, and views of the line will be broken by trees.
- 6.16.23 Rule 6 In country which is flat and sparsely planted, keep the high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration or 'wirescape'.
- 6.16.24 Rule 7 Approach urban area through industrial zones, where they exist; and when pleasant residential and recreational land intervenes between the approach line and the substation, go carefully into the comparative costs of the undergrounding, for lines other than those of the highest voltage.

Horlock Rules

- 6.16.25 NGET devised the Horlock Rules in 2003, and these were subsequently updated in 2006 (National Grid, 2006). The Horlock Rules provide guidelines for the siting and design of new substations, or substation extensions, to avoid or reduce the environmental effects of such developments. In summary, like the Holford Rules, they facilitate consideration of environmental and amenity considerations within the design and siting of new substation infrastructure.
- 6.16.26 The Horlock Rules contain the following guidelines in relation to siting which have been adopted in the development of the Project:
- 'Overall System Options and Site Selection
- 6.16.27 In the development of system options including new substations, consideration must be given to environmental issues from the earliest stage to balance the technical and capital cost requirements for new developments against the consequential environmental effects to keep adverse effects to a reasonably practicable minimum.
- Amenity, Cultural or Scientific Value of Sites

6.16.28 The siting of new NGETN substations, sealing end compounds and line entries should as far as reasonably practicably seek to avoid altogether internationally and nationally designated areas of the highest amenity, cultural or scientific value by the overall planning of the system connections — Areas of local amenity value, important existing habitats and landscape features including ancient woodland, historic hedgerows, surface and ground water sources and nature conservation areas should be protected as far as reasonably practicable.

- Local Context, Land Use and Site Planning

6.16.29 The siting of substations, extensions and associated proposals should take advantage of the screening provided by landform and existing features and the potential use of site layout and levels to keep intrusion into surrounding areas to a reasonably practicable minimum.

6.16.30 The proposals should keep the visual, noise and other environmental effects to a reasonably practicable minimum.

6.16.31 The land use effects of the proposal should be considered when planning the siting of substations or extensions.

- Design

6.16.32 In the design of new substations or line entries, early consideration should be given to the options available for terminal pylons, equipment, buildings and ancillary development appropriate to individual locations, seeking to keep effects to a reasonably practicable minimum.

6.16.33 Space should be used effectively to limit the area required for development consistent with appropriate mitigation measures and to minimise the adverse effects on existing land use and rights of way, whilst also having regard to future extension of the substation.

6.16.34 The design of access roads, perimeter fencing, earthshaping, planting and ancillary development should form an integral part of the site layout and design to fit in with the surroundings.

- Line Entries

6.16.35 In open landscape especially, high voltage line entries should be kept, as far as possible, visually separate from low voltage lines and other overhead lines to avoid a confusing appearance.

6.16.36 The inter-relationship between pylons and substation structures and background and foreground features should be studied to reduce the prominence of structures from main viewpoints. Where practicable the exposure of terminal pylons on prominent ridges should be minimised by siting pylons against a background of trees rather than open skylines’.

National Planning Policy Framework

6.16.37 The following paragraph from the NPPF is considered of relevance:

6.16.38 Paragraph 5 of NPPF (MHCLG, 2025) states:

‘The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as

amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework)'.

6.16.39 While the NPSs remain the prime decision-making documents, regard must also be had to any other matters of importance and relevance, which may include relevant policies in the NPPF.

Thurrock Core Strategy Local Plan

6.16.40 Of relevance are:

- Thurrock Local Development Framework, Core Strategy and Policies for management of Development (adopted 2015)
- Thurrock Borough Local Plan 1997 Saved Policies (adopted 1997).

6.16.41 Emerging plan:

- The Thurrock Council Local Plan is currently under review, and a new plan is set to be adopted in summer 2026 (Regulation 18 consultation completed February 2024).

6.17 Compulsory Acquisition of land

Summary

6.17.1 The Council does not consider that the Applicant has met the necessary tests for the compulsory acquisition of land which hosts the Linford HWRC. Specifically, the Applicant has not demonstrated that the land is required for the development, nor is it in the public interest for rights in this land to be compulsorily acquired. Finally, the Applicant has not adequately sought to acquire land by agreement in the first instance, using compulsory acquisition powers as a last resort. Acquisition of the land has the potential to negatively impact residents' use of the site, restricting the Council's ability to fulfil its statutory duties as a waste collection authority and potentially causing traffic issues on Buckingham Hill Road.

National Policy Statements

6.17.2 N/A.

National Policy/Guidance

National Policy

6.17.3 Section 122 of the 2008 Act sets out the test for land to be compulsorily acquired under a DCO. Compulsory acquisition is appropriate only under the condition that the land:

(a) is required for the development to which the development consent relates,

(b) is required to facilitate or is incidental to that development, or

(c) is replacement land which is to be given in exchange for the order land under section 131 or 132.

Equally, it is required at section 122(3) of the 2008 Act that:

The condition is that there is a compelling case in the public interest for the land to be acquired compulsorily.

6.17.4 Similarly to the above, guidance issued by the Department for Communities and Local Government "Planning Act 2008: Guidance relating to procedures for the compulsory acquisition of land" (September 2013) ("Guidance") also makes clear that applicants for DCOs:

- Are required to show that the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development, or is replacement land given in exchange under section 131 or 132, and
- there is a compelling case in the public interest for the compulsory acquisition.

The Applicant should be able to demonstrate that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored and that the proposed interference with the rights of those with an interest in land is for a legitimate purpose, and that it is necessary and proportionate.

6.17.5 The Applicant's engagement with the Council has been insufficient to confirm that these requirements pursuant to Guidance and the 2008 Act are met. Details of the land identified for acquisition and its proposed use have been vague; and the Applicant's land agent has been broadly unresponsive and often uninformed. This lack of engagement has made it impossible for the Council to determine if the land identified for acquisition by the Applicant is indeed required for the development, or if minor adjustments to the route could mean alternative land could be used. Similarly, the extent to which there is or is not a compelling case in the public interest for use of the land cannot be determined.

6.17.6 Equally, the Applicant's engagement with the Council to seek a voluntary agreement has not been sufficient to determine that compulsory acquisition is required as the last resort. In the case of the site of Linford household waste and recycling centre ("HWRC"), to which land and access rights are sought by the Applicant: in late 2024, the Applicant began discussions with the Council regarding a potential voluntary agreement for this land, but then stopped responding to the Council on this matter without reaching a conclusion, and appeared to stop pursuing a voluntary agreement. As at the date of this LIR the Council has received no further correspondence from the Applicant in relation to any voluntary agreements relating to the HWRC.

6.17.7 Given the inclusion of the HWRC within the Order Limits, the Council is concerned that it will be put in breach of its duties under the EPA 1990 to provide such waste provision. The Council cannot be in a position where access and use of the HWRC is at any point restricted (on a temporary or permanent basis) particularly as the Applicant has failed to engage suitably with the Council to provide details of land interests it requires in this area, to negotiate a voluntary agreement with the Council or consider any modifications to the Application as a result of such discussions.

6.17.8 Section 51 of the Environmental Protection Act 1990 states that:

(1) It shall be the duty of each waste disposal authority to arrange—

(b) for places to be provided at which persons resident in its area may deposit their household waste and for the disposal of waste so deposited.

Local Impact Assessment

Construction Phase

Positive Impacts

6.17.9 N/A.

Neutral Impacts

6.17.10 The applicant is proposing to acquire temporary rights to land adjacent to Buckingham Hill Road, on which Linford HWRC operates and, which is the Council's only HWRC. The Linford HWRC site is located in land plots H-4/66, H-4/68, H-4/70, H-4/82 as identified in Document 2.2 - Land Plans Section H (APP-016). The Council understands that during construction, the Applicant will use land near the site to erect scaffolding to support catch nets to ensure the adjacent road can remain open during the installation of the overhead wires between pylons TB256 and TB259. The Applicant has indicated that the scaffolding is likely to be positioned outside of the HWRC land, in which case it should avoid interfering with operation of the HWRC.

Negative Impacts

6.17.11 The LoD for the section of overhead line running past the Linford HWRC (TB256-TB259 inclusive), which requires the erection of scaffolding, are wide, and include the entirety of the HWRC site. The Applicant has indicated that the scaffolding installed to facilitate installation of the overhead lines may, in the case of deviation of the location of the works, interfere with normal operation of the HWRC for a period of up to three months. If the LoD was to encompass the entire HWRC this would pose a significant adverse impact for a critical operational facility.

6.17.12 The Applicant has indicated that it does not expect the implications to be significant for the HWRC, but until the design of the pylons is finalised, this gives rise to a significant negative impact upon the Council's only operational HWRC. Linford HWRC is the Council's only public household waste and recycling centre, so it is a highly important and well-used resource for residents of Thurrock and is crucial for the Council to meet its statutory obligation (under the EPA 1990) to provide places for residents to dispose of household waste.

6.17.13 The HWRC only has one access point, on Buckingham Hill Road, and it can only be accessed by traffic travelling north. As such, it is vulnerable to significant access issues during busy periods, and buildup of residents trying to access the centre can have negative implications for other traffic travelling on Buckingham Hill Road. If the Applicant's works on the site are to impact residents' ability to access the centre, there will be significant implications for Thurrock Council's ability to meet its statutory obligation to provide places for residents to dispose of household waste.

6.17.14 Similarly, vehicle movement at the HWRC, required to deliver materials for the works proposed at the site may also have a negative impact on residents' access to the HWRC. The scale of this impact will depend on the final design which the Council are yet to received.

Operational Phase

Positive Impacts

6.17.15 N/A.

Neutral Impacts

6.17.16 N/A.

Negative Impacts

6.17.17 The Applicant is proposing to permanently acquire rights to the land on which the Council's HWRC is located to establish a permanent access route. The plans provided for the access route show it crossing the public entrance to the HWRC. There is potential for this to permanently constrain access to the site, which (as detailed in the construction phase section) is already vulnerable, and would risk impeding the Council's ability to perform its statutory duties regarding the provision of places to dispose of household waste (as set out in the EPA 1990).

6.17.18 Limiting access to the site would also have the potential to cause a buildup of traffic on Buckingham Hill Road waiting to access the site, having significant negative impacts for the local highway network. The Council has sought to engage with the Applicant on this issue but has received little information regarding the details of the access route, including its location and management of access. The Applicant has indicated intention to agree specific access arrangements prior to individual visits, but this does not remove the need for certainty regarding the extent of land take, the position of access routes, and any permanent implications for the site. As such, the potential negative impacts remain significant

Decommissioning Phase

Positive Impacts

6.17.19 N/A

Neutral Impacts

6.17.20 N/A.

Negative Impacts

6.17.21 N/A.

Required Mitigation

6.17.22 Further engagement between the Applicant and the Council is required to develop design at the site which has the least possible impact on the operation of the HWRC site. Before and during the

construction period, the Applicant and/or its agents must engage with the Council to ensure that works are arranged appropriately to avoid impact on residents' use of the site.

7.0 Appendix A: The Council's suggested comments to the Draft Development Consent Order

This Appendix A contains the Council's comments and proposed alterations to the draft DCO in a table format so that the Applicant can easily see the alterations proposed in the context of the impacts raised in this LIR.

The Council reserves the right to request further alterations to the DCO and DCO requirements at a later date in response to evidence presented during the Examination period.

Draft DCO Article/Requirement	Response from the Council
Article 2 (Interpretation) – definition of "pre-commencement operations"	<p>The current definition of "pre-commencement operations" in Article 2(1) (Interpretation) of the draft DCO [APP-056] includes investigations and surveys, which the Council understands would apply to both intrusive and non-intrusive investigations and surveys. Under Article 3(1) (Stages of authorised development) of the draft DCO, unless otherwise agreed with the relevant planning authority, written notice of the anticipated programme for these operations must be given to the relevant planning authority.</p> <p>The Council is concerned that the current provisions of the draft DCO permits the carrying out of investigations and surveys, regardless of whether these are intrusive or non-intrusive, without agreement of the Council. The Council requires that, at a minimum, a Licence Agreement and details of the investigation(s)/survey(s) must be agreed and in place prior to the carrying out of those pre-commencement operations.</p> <p>The definition of "pre-commencement operations" also includes "demolition of existing buildings". The Council requires that its prior approval is sought and granted before demolition of any building(s) where the building(s) lies within an area where it is the competent authority.</p>
Article 5 - Limits of deviation	<p>The current drafting of Article 5(1) permits the undertaker to deviate from controls and restrictions that would otherwise apply, for example in circumstances such as those set out in Article 5(1)(b) with regard to pylon works. The carrying out of works within the limits of deviation does not require the undertaker to seek prior approval from the relevant planning authority. As such, the Council is concerned that the Outline CoCP [APP-300] does not contain any specific commitments that apply to works in sensitive areas such as listed building or conservation areas.</p> <p>The Council requests that the Applicant clarifies its approach to the carrying out of works in sensitive areas such as listed building or conservation areas and includes a commitment within the Outline CoCP and/or by another mechanism secured within the draft DCO that would safeguard these areas.</p>
Article 11 – Street works	<p>Article 11 grants the undertaker wide-ranging powers, including those which can be carried out without the consent of the street authority under Article 11(1).</p> <p>The Council notes that the draft DCO [APP-056] contains Protective Provisions for the protection of the highway authorities (at Part 4 of Schedule 16). These Protective Provisions must contain adequate protections that ensure the Council as Local Highway Authority is not subject to detriment as a result</p>

	of the carrying out of the authorised development. The Council may make further submissions on the content of these Protective Provisions.
Article 11(3) – Street works	<p>The draft DCO [APP-056] provides at Article 11(3) that:</p> <p>"If a street authority that receives an application for consent under paragraph (2) fails to notify the undertaker of its decision within 28 days (or such other period agreed by the street authority and the undertaker) beginning with the date on which the application was received, that authority will be deemed to have granted consent."</p> <p>Thurrock Council raises concern regarding the proposed deemed consent mechanism whereby, if the street authority fails to notify the undertaker of its decision within 28 days, consent is automatically granted. While the Council recognises the need for procedural efficiency in delivering the Project, the proposed drafting presents the following concerns:</p> <p>1. Insufficient Determination Period</p> <p>A 28-day period may be inadequate where applications involve:</p> <ul style="list-style-type: none"> • Technical highway design review • Road safety audits • Drainage and structural considerations • Traffic management impacts • Consultation with internal departments or third parties • Technical Assessment of CAT0, 1 or 2 structures is required <p>Highway-related submissions frequently require detailed engineering assessment. The automatic grant of consent due solely to administrative timescales could prejudice highway safety and network integrity.</p> <p>2. Risk to Statutory Duties</p> <p>As highway authority, the Council has statutory duties under the Highways Act 1980 to ensure the safe and efficient operation of the highway network. The deemed consent provision could undermine the Council's ability to properly discharge those duties if consent is granted by default rather than through technical approval.</p> <p>3. Lack of Safeguard for Incomplete Submissions</p>

	<p>The drafting does not expressly provide that the 28-day period commences only upon receipt of a “complete” application. Without such clarification, there is potential for the undertaker to submit insufficient information, thereby triggering the deemed consent mechanism before proper assessment can occur.</p> <p>The Council therefore requests that:</p> <ul style="list-style-type: none"> • The determination period be extended to a minimum of 42 days; and/or • The deemed consent provision be removed in respect of highway authority approvals; and/or • The period should only commence once the authority confirms in writing that a complete submission has been received; and • Deemed consent should not apply where further information has reasonably been requested within the determination period. • Where Technical Assessment of CAT0, 1 or 2 structures is required, the Council will require an extension of this period by up to 3 months
Article 12(1) – Application of the Permit Schemes	<p>Article 12(1) of the draft DCO [APP-056] sets out that the permit schemes apply to the construction and maintenance of the authorised development and will have effect in connection with the exercise by the undertaker of any powers conferred by this Part. "Permit scheme" is defined in Article 2(1) (Interpretation). The Council may have further comments on the scope of this Article to ensure its coverage is appropriate.</p>
Article 14 - Power to alter layout, etc. of streets	<p>The Council notes that the powers contained in Article 14 are wide-ranging and under Article 14(1) may be carried out with the consent of the street authority. This includes the power to permanently or temporarily alter the layout of streets where the Council is the relevant street authority. Article 14(2) also confers wide-ranging powers to the undertaker regarding streets but is subject to Article 14(4), meaning that paragraph (2) may not be exercised without the consent of the street authority (such consent not to be unreasonably withheld or delayed).</p> <p>Where the Council is the relevant street authority, it may set requirements for its consent to be granted, such as a safety audit where powers under Article 14(2)(a) are proposed to be exercised by the undertaker. Any application for consent would be considered against all the relevant issues, such as the route and traffic usage on that route. The Council may also grant its consent subject to certain conditions such as liaison with the Council's Highways Maintenance team, which may have specific requirements for surfacing for roads and their traffic levels.</p> <p>The Council expects that powers exercised under Article 14(2) would only be done so in consultation with the relevant highway authority.</p>

<p>Article 16 – Temporary closure of streets and public rights of way</p>	<p>Some of the powers that may be exercised by the undertaker under Article 16 do not require prior approval by the relevant highway authority. For example, Article 16(1) provides that the undertaker may temporarily close, alter or divert any street or public right of way shown on the access, rights of way and public rights of navigation plans or within the Order limits and may for any reasonable time divert the traffic from the street or public right of way and subject to paragraph (3), prevent all persons from passing along the street or public right of way.</p> <p>The Council is concerned that where prior approval by the relevant highway authority is not required, service users of highways may not be adequately protected and suitable alternative provisions may not be provided by the undertaker. The Applicant must ensure that suitable protections are included in the Protective Provisions of the draft DCO or a separate side agreement be entered with the Council as highways authority.</p>
<p>Article 17 – Access to works</p>	<p>The Council notes that Article 17(1)(a) permits the undertaker to form and lay out new means of access, or improve existing means of access, at locations specified in Schedule 9. The Council will need to ensure that all such accesses within its administrative area are acceptable in highway safety, traffic management, and structural terms. The Council therefore expects that detailed design approval, including construction methodology and reinstatement details, will be secured through appropriate protective provisions or requirements.</p> <p>In relation to Article 17(1)(b), the Council has particular concern regarding:</p> <p>1. Breadth of Undertaker Discretion</p> <p>The power to form or improve “such other means of access... as the undertaker reasonably requires” within the Order limits is broad. While subject to street authority consent, the drafting gives significant flexibility to the undertaker without clearly defined assessment criteria. The Council considers that clearer parameters should apply to:</p> <ul style="list-style-type: none"> • The scale and type of access permitted; • Traffic generation and construction vehicle routing implications; • Impacts on the local highway network, including sensitive rural lanes and residential roads. <p>2. Deemed Consent Mechanism (Article 17(2))</p> <p>The deemed consent provision presents a material risk to the Council in its capacity as highway authority.</p>

	<p>A 28-day determination period may be insufficient where:</p> <ul style="list-style-type: none"> • The access has safety implications; • Technical review is required (e.g. swept path analysis, Stage 1/2 Road Safety Audit, drainage assessment); • Internal consultation or committee reporting is necessary. <p>The Council is concerned that failure to respond within 28 days results automatically in deemed consent, regardless of complexity. This could undermine proper highway assessment and public safety considerations.</p> <p>The Council therefore recommends that:</p> <ul style="list-style-type: none"> • The determination period be extended to a minimum of up to 42 days and/or • Deemed consent should not apply in relation to highway authority functions and/or • Deemed consent should only apply where sufficient supporting technical information has been provided and agreed as complete.
<p>Article 27(5)(b) – Temporary use of land by National Grid</p>	<p>This Article provides that National Grid is not required to restore the land on which any works or mitigation works have been carried out under paragraph (1)(d), which applies to. The Council requires a commitment from National Grid that it would restore such land as this land should not be subject to detriment as a result of the implementation of the DCO.</p>
<p>Article 49 – Traffic regulation</p>	<p>Article 49 grants broad powers to the undertaker that may have serious implications for the highways network, including the prohibition of use of roads by through traffic. The Council is concerned that such powers may be used by the undertaker unilaterally and without proper liaison with the relevant highway authority. The draft DCO should be updated so that Article 49 powers are available to the undertaker in consultation with the relevant highway authority. This will ensure that sufficient controls are in place to ensure the highway network is not subject to unnecessary detriment as a result of the implantation of the DCO.</p>
<p>Article 51 – Trees subject to Tree Preservation Orders</p>	<p>The Council notes that the Outline CoCP [APP-300] sets out commitments by the Applicant in relation to trees. The Council is in discussion with the Applicant with regard to an appropriate mechanism(s) such as a section 106 agreement for trees. The Council may have further comments on this Article.</p>
<p>Article 56(6) – Safeguarding</p>	<p>Article 56(6) provides that the requirement to consult under this article is a local land charge. The Council requests that the Applicant clarifies why this provision is necessary when by virtue of section 134 of the Planning Act 2008, the DCO would be registered as a local land charge. The Council is</p>

	<p>mindful that Article 56 may impose an additional and unnecessary administrative burden on the relevant local planning authority.</p>
<p>Article 59(2)(a) – Amendment of local legislation</p>	<p>This Article provides that a power conferred by the DCO may be exercised without regard to a specified enactment, or any other statutory provision of local application, that requires or permits a specified road, path, passage, bridge, parapet, fence or other place or structure to be kept open or maintained generally or in a specified manner.</p> <p>The Council does not consider that Article 59(4) provides sufficient protection to the Council's role as local highways authority. Article 59(4) must be exercised in consultation with the relevant highway authority.</p>
<p>Schedule 3 - Requirements</p>	<p>The Council has raised issues in its Local Impact Report, including around required mitigation measures such as the provision of a Business Engagement and Support Plan and a Local Procurement and Skills Framework. The Applicant should consider incorporating such measures into the draft DCO as Requirements.</p>
<p>Requirement 3 – Stages of authorised development</p>	<p>Requirement 3(1) provides that</p> <p>“(1) Unless otherwise agreed with the relevant planning authority, written notice setting out the anticipated programme for the carrying out of pre-commencement operations must be given to the relevant planning authority no less than seven days prior to the date on which those pre-commencement operations are first carried out”</p> <p>The Council has raised concerns regarding the definition of “pre-commencement operations” in Article 2(1) of the draft DCO. The definition (interpretation) of “pre-commencement operations” includes investigations and surveys. The Council understands this to encompass both intrusive and non-intrusive activities. The Council considers it inappropriate that such works may proceed without prior approval or formal agreement from the Council. Notification alone does not provide the Council with sufficient control to ensure that works are properly scoped, managed, and insured, nor does it secure appropriate reinstatement obligations.</p> <p>The Council’s position remains that</p> <ul style="list-style-type: none"> • A Licence Agreement must be in place prior to entry onto Council-owned land; • Full details of the proposed investigations/surveys must be submitted and approved in writing before works commence;

	<ul style="list-style-type: none"> • Appropriate method statements, risk assessments and reinstatement proposals must be agreed in advance. <p>The Council also notes that seven days' notice is insufficient for meaningful review and there is no express mechanism preventing works from proceeding where concerns are raised within the notice period. The Council request that the seven-day notice period is extended or replaced with a prior approval mechanism. Also, that demolition is removed from the definition of pre-commencement operations unless expressly approved by the relevant planning authority.</p>
Requirement 4 – Construction Management Plan	<p>The Council notes that the Outline Code of Construction Practice (CoCP) [APP-300] includes a commitment (commitment reference GG22) that the Main Works Contractor(s) will prepare a Surface Water Management Plan to inform discharge of DCO Requirement 4.</p> <p>The Council is concerned that the Applicant has not made a commitment that the Surface Water Management Plan must be in accordance with the national Sustainable Drainage System (SuDS) standard.</p>
Requirement 6 – Design and layout plans (elevations)	<p>Requirement 6 of the draft DCO currently provides that:</p> <p>"(1) The authorised development must be carried out in general accordance with the levels shown on the design and layout plans (elevations).</p> <p>(2) The authorised development will not be in general accordance with the design and layout plans (elevations) to the extent that any departure from the design and layout plans (elevations) gives rise to any materially new or materially different environmental effects from those identified in the environmental statement."</p> <p>The Council requests that the drafting of Requirement 6(1) is amended as follows:</p> <p>"(1) The authorised development must be carried out in general accordance with the levels shown on the design and layout plans (elevations) <i>unless otherwise agreed in writing with the relevant planning authority.</i>"</p>
Requirement 7 – Construction hours	<p>Requirement 7(1) of the draft DCO currently provides that work may only take place between the hours of 07.00 and 19.00 Monday to Friday and 07.00 and 17.00 on Saturdays, Sundays, bank holidays and other public holidays (which are defined as the "core working hours"), unless otherwise approved by the relevant planning authority.</p>

	<p>The Council considers the proposed core construction hours excessive and inconsistent with local policy and community expectations. The Council requests that the core working hours are aligned with the Council's standard core working hours, being: Monday to Friday 08:00 to 18:00; Saturday 08:00 to 13:00; Sunday and Bank Holidays: No works.</p> <p>Where the undertaker deems it necessary to carry out works outside of these hours, the Council considers that this should be managed through a section 61 prior consent notice under the Control of Pollution Act 1974 to allow for justification of out-of-hours works on a case-by-case basis and ensures that best practicable means are demonstrated to minimise noise and disruption. This would provide the Council proper oversight without unnecessarily constraining essential activities and allow works or mitigation to be carried out appropriately.</p>
Requirement 9 – Reinstatement planting plan	<p>The Council has raised in its Local Impact Report that it is concerned with prolonged construction impacts on landscape receptors, PRoWs, visual amenity; coordination with the LTC mitigation planting; early delivery of planting to offset visual harm, loss of screening and amenity impacts etc. The Requirement as drafted does not guarantee early planting and also allows planting to be postponed until a potentially late operational trigger.</p>
Requirement 9(3) – Reinstatement planting plan	<p>Requirement 9(3) provides that:</p> <p>"(3) The reinstatement planting plan submitted under sub-paragraph (1) must be in general accordance with the outline landscape and ecological management plan (or the final landscape and ecological management plan if approved pursuant to requirement 4)."</p> <p>The Council considers that the requirement to be "in general accordance with the outline landscape and ecological management plan" is too uncertain and subjective. The Council requests the draft DCO be updated to remove reference to "general" to remove the ambiguity about how this Requirement will be adhered to.</p>
Requirement 10 – Reinstatement schemes	<p>Requirement 10(1) provides that:</p> <p>"(1) Subject to sub-paragraphs (2) and (3), any land within the Order limits which is used temporarily for construction is to be reinstated to a condition suitable for its former use, or such condition as the relevant planning authority may approve, within 21 months of completion of the construction of the stage of authorised development for which it was required, or such further time as may be approved by the relevant planning authority."</p> <p>The Council considers that 21 months is a prolonged period during which land may remain in a disturbed or substandard condition which may result in extended visual, environmental and amenity</p>

	<p>impacts. The Council considers that reinstatement should occur within 12 months or as soon as reasonably practicable following completion of construction in each area, rather than allowing a blanket 21-month period.</p>
Requirement 12 – design of permanent buildings	<p>Requirement 12 provides that:</p> <p>"Any permanent buildings forming part of the authorised development must be in general accordance with the design approach for site specific infrastructure, unless otherwise agreed in writing by the relevant planning authority."</p> <p>The Council considers that the requirement to be "in general accordance with the design approach for site specific infrastructure" is too uncertain and subjective. The Council requests the draft DCO be updated to remove reference to "general" to remove the ambiguity about how this Requirement will be adhered to.</p>
Proposed new Requirement – Contamination of land or groundwater and controlled waters	<p>Contamination of land or groundwater and controlled waters</p> <p>(1) If during any stage of the authorised development, contamination within the Order limits is identified as a result of the confirmatory ground investigations or unexpected contamination discovery procedures described in chapter 9 of the Environmental Statement (Document - Contaminated Land Geology and Hydrogeology) and the code of construction practice, and this contamination is considered to present a significant possibility of significant harm to persons or pollution of controlled waters or the environment then, except in the case of emergency, no further development in the vicinity of the contamination may be carried out until a written scheme to identify the extent of the contamination and any mitigation or remedial measures to be taken to render the land fit for its intended purpose has been submitted to and approved by the relevant planning authority, following consultation with the Environment Agency.</p> <p>(2) Should mitigation or remedial measures be required then they must be carried out in accordance with the approved scheme referred to in paragraph (1) and, if remedial measures are required, their implementation and validation documented in a verification report submitted to the planning authority.</p> <p>(3) In this requirement (contamination of land or groundwater and controlled waters), "controlled waters" has the same meaning as in Part 2A of the Environmental Protection Act 1990(a).]</p>
Proposed new Requirement – Site specific mitigation scheme	<p>Site specific mitigation scheme</p> <p>19.—(1) No part of [X] that affects the [X] may commence until a scheme to mitigate the impacts of construction activities arising from those works, including noise, dust, vibration, and visual effects</p>

	<p>(including from lighting), has been submitted to and approved in writing by the relevant planning authority.</p> <p>(2) The scheme referred to in sub-paragraph (1) must include the approach to liaison for the [X] during the construction period.</p> <p>(3) In the event that significant effects of noise or vibration are identified on [specific receptors] as shown within the chapter 14 of the Environmental Statement (Document - Noise and Vibration) the scheme Referred to in sub-paragraph (1) must include mitigation measures to reduce the significant effects as far as practicable.</p> <p>(4) The construction works for that part of [Work No X] which affects the [X] must be carried out in accordance with the approved scheme referred to in subparagraph (1) above, unless otherwise agreed with the relevant planning authority.</p>
<p>Schedule 4(1)(1) – Discharge of Requirements</p> <p>Applications made under Requirements</p>	<p>This part of Schedule 4 provides that a relevant authority must give notice to the undertaker of its decision on any application made by the undertaker for consent, agreement or approval required by a Requirement within 28 days. The Council requires that the time period matches the period that is contained in the final, agreed version of the Planning Performance Agreement between the Council and the Applicant.</p>
<p>Schedule 4(2)(2) – Discharge of Requirements</p> <p>Further information</p>	<p>This part of Schedule 4 provides that, where an application has been made under paragraph 1, if the relevant authority considers further information is necessary and the Requirement does not specify that consultation with a requirement consultee is required, the relevant authority must, within 5 days of receipt of the application, notify the undertaker in writing specifying the further information required.</p> <p>The Council considers that the 5 day response period provided for the relevant authority is not appropriate and that it must be extended. "Within 5 days of receipt of the application" would include weekends, which means the Council would lose 2 days to review and respond to an application by the undertaker. At a minimum the Council requests that the 5 day period is computed as business/working days.</p>
<p>Schedule 4(3) - Discharge of Requirements</p> <p>Fees</p>	<p>The Council notes that the draft DCO provides for a fee of £145 per request, where an application is made to a relevant authority for any consent, agreement or approval required by a Requirement, payable unless a bespoke arrangement has been agreed between the applicant and discharging authority and legally secured. The Council requires that any fees payable in these circumstances are in line with national planning fees, or such fees agreed with the Applicant, to ensure the proper cost of processing these applications is charged.</p>

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