

**APPLICATION BY NATIONAL GRID ELECTRICITY TRANSMISSION (THE APPLICANT) FOR AN
ORDER GRANTING DEVELOPMENT CONSENT FOR THE NORWICH TO TILBURY
ELECTRICITY TRANSMISSION SYSTEM UPGRADE (PROJECT)**

**SUMMARY OF REPRESENTATION MADE BY NATIONAL HIGHWAYS IN THEIR CAPACITY AS
PROMOTERS OF THE LOWER THAMES CROSSING PROJECT AT THE:**

- **PRELIMINARY MEETING (10 February 2026)**
- **COMPULSORY ACQUISITION HEARING 1 (11 February 2026)**
- **ISSUE SPECIFIC HEARING 1 (13 February 2026)**

1 Introduction

1.1 This document sets out the summary of representations made by the National Highways Lower Thames Crossing Project team (LTC Project team) at:

- 1.1.1 the Preliminary Meeting held on 10 February 2026;
- 1.1.2 the Compulsory Acquisition Hearing held on 11 February 2026; and
- 1.1.3 the Issue Specific Hearing held on 13 February 2026.

1.2 The LTC Project was consented in March 2025 and is currently in its delivery phase. As previously raised in its relevant representation [RR-2215], there is significant overlap between the Applicant's project and the LTC DCO.

2 Summary of representations made at the Preliminary Meeting

2.1 The Preliminary Meeting was attended virtually by Monika Weglarz, Managing Associate at TLT, legal advisors for the LTC Project.

Agenda item 3: Initial Assessment of principal issues

2.2 For context, the LTC Project team set out that the LTC project was consented in 2025 and is now in its delivery stage. It then highlighted that there are significant concerns relating to the impacts of the Applicant's project on the delivery of the LTC project.

2.3 The LTC Project team welcomed the Applicant's confirmation that it will be pursuing Option B around Tilbury, as per its submission into the examination on Monday 9 February. However, it was made clear that although the LTC team prefer this option over Option A, pursuing option B addresses only a small amount of issues (7 out of 35) in the SoCG between the parties. The LTC Project team confirmed that whilst both parties are now working collaboratively and meeting regularly to work to resolve the matters, much remains outstanding.

2.4 The LTC Project team acknowledged that at Annex C to the Rule 6 letter, the Examining Authority had identified some principal issues, one of which is listed as "*interactions and coordination with other nationally significant infrastructure projects and major planning applications*". Whilst the LTC Project team welcomed the inclusion of this, it noted that this topic is listed as falling under a broader heading of "cumulative effects". The LTC Project team considers that looking at the interactions and coordination with the LTC solely under the heading of "cumulative effects" does not give sufficient prominence to the complications the Applicant's project causes to the LTC DCO, and the potential adverse impact on LTC's delivery.

2.5 The LTC Project team then went on to highlight the following matters in particular for specific consideration by the Examining Authority, and which go beyond "cumulative effects":

- 2.5.1 compatibility between the Applicant's proposed permanent works and the location of the works consented by the LTC DCO;
 - 2.5.2 overlap of land powers; and
 - 2.5.3 compatibility of construction proposals and programmes, and the subsequent effects.
- 2.6 Specifically, the LTC Project team requested that the interface between the Applicant's project and the LTC is given "principal issue" status in its own right, given the importance of the LTC and the complexity of the interface.
- 2.7 As a final point, the LTC Project team confirmed that it welcomed the Examining Authority's request in its Rule 6 letter [PD-009] for the Applicant to produce an Interrelationship document for Deadline 1. This should assist in appropriately assessing the impact of the project on the LTC DCO.

Agenda item 4: Draft examination timetable

- 2.8 The LTC Project team confirms that it does not have any objections to the requests made by the Applicant in their response to the Rule 6 letter [PDA-001] in relation to the examination timetable.

Agenda item 8: AOB

- 2.9 The Applicant raised the issue of displaying and using GIS mapping during examination hearings to assist the examination in understanding the issues surrounding certain locations. The LTC Project team confirmed that this would be helpful and that they have no objection to the Applicant using the data provided to them by the LTC team in order to show the overlap between the two projects when that topic is being discussed. The LTC Project team has since confirmed in writing to the Applicant's legal advisors, BCLP, that this is the case and has set out specifically what information can be shared.

3 Summary of representations made at the Compulsory Acquisition Hearing

- 3.1 The Compulsory Acquisition Hearing was attended virtually by Monika Weglarz, Managing Associate at TLT, legal advisors for the LTC Project.

Agenda item 3: the Applicant's case for the compulsory acquisition (CA) and temporary possession (TP) of land and rights

- 3.2 The LTC Project team confirmed that whilst it does not object to the Applicant's project in principle, there are significant spatial interactions between the projects, in terms of the locations of LTC's consented works and the proposed works of the Applicant's Project, and the associated land requirements, and significant temporal interactions between the projects, in terms of the respective construction programmes and methodologies.
- 3.3 In particular, the Applicant's project has significant overlap with the consented LTC DCO in terms of land impacted and the proposed powers of various land plots, and consequently there is the potential for there to be conflicting use of powers over the same plots of land.
- 3.4 The LTC Project team highlighted that there are also concerns about how the proposed compulsory acquisition powers would impact upon the LTC team's ability to deliver on their environmental and community commitments and obligations in the LTC DCO.
- 3.5 The LTC Project team stated that, in the first instance, a further analysis needs to be carried out of the interaction between the land plots in order to fully understand the interactions and identify

suitable solutions. It noted that, to date, this has not been possible as it has not received sufficient information from the Applicant, e.g. land plan overlays.

- 3.6 The LTC Project team also confirmed that they were aware of the Applicant's notification on 9 February 2026 of their intention to discard Option A and continue with Option B, as regards the interaction with its project and the LTC DCO. The LTC Project team confirmed that it supported this decision but noted that it will need time to review and assess the updated Option B land and works plans once published.
- 3.7 The LTC Project team confirmed that they and the Applicant are working collaboratively, including meeting regularly, but that further information needs to be provided by the Applicant before it can crystallise what the issues are. Until that has been provided and assessed, the LTC Project team cannot definitively confirm its position in relation to compulsory acquisition powers.
- 3.8 The LTC Project team confirmed that it will keep the ExA informed as it works through the issues. Whilst it is envisaged that a side agreement and potential LTC specific protective provisions will be needed, this will be confirmed in due course.

4 Summary of representations made at Issue Specific Hearing 1

- 4.1 Issue Specific Hearing 1 was attended in person by Tom Henderson, Partner at TLT, legal advisors for the LTC Project and Keith Howell, Programme Utilities Lead and Allyship Workstream Lead for the Lower Thames Crossing Project.

Agenda item 4: Scope of the proposed development

- 4.2 The LTC Project team started by setting out that the submissions to be made cross across some other agenda items, notably agenda item 5: Alternatives, and agenda item 6: Interrelationship with other projects, but setting them out together is considered to be most appropriate.
- 4.3 When reviewing the NTT application documents, the LTC Project team has been struck by the general lack of prominence and weight given to the LTC DCO, specifically in relation to design development and site selection, as well as a lack of consideration given to LTC key mitigation and compensation commitments. The LTC application was accepted for examination in October 2022 and proposals in the Tilbury area have not changed materially since then so the LTC Project team would have expected the LTC DCO, which has now been consented, to be taken into account more fully. As a result of the lack of doing so, a number of significant interfaces have arisen and there are now instances in which the proposed NTT DCO would cause National Highways to be in breach of the LTC DCO.
- 4.4 The LTC Project team is seeking more information about the site selection process, specifically as it relates to the proposed location of the Applicant's Tilbury north substation in the area of the LTC DCO compensatory habitat for nitrogen deposition (plot 5/29) and compensatory woodland. In particular, it is not understood why a location north of the proposed location has not been considered.
- 4.5 There are also interactions with the LTC DCO's relocated travellers site, which could potentially cause National Highways to be in breach of its LTC DCO.
- 4.6 The LTC Project team confirmed that it is content for the Applicant to deal with these matters in the interrelationship document to be submitted at Deadline 1.
- 4.7 **Post Hearing Note:** We welcome the Examining Authority's request for the Interrelationship document, a first draft to be submitted at deadline 1 (26 February). We expect it to contain the following detail:

1. Land interfaces between the Applicant's project and the LTC DCO
2. Consideration of temporal impacts of the Applicant's project on the LTC DCO, i.e. construction effects
3. Inter-Project Cumulative Effects
4. Construction phase control documents
 - Code of Construction Practice
 - Outline Traffic Management Plan for Construction
5. Consultation and engagement with key stakeholders