

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

**NATIONAL HIGHWAYS' (LOWER THAMES CROSSING PROJECT) WRITTEN REPRESENTATION**

1. This document sets out the Lower Thames Crossing project's ('NH LTC's') written representation ("WR") in respect of the Applicant's Norwich to Tilbury Project ('the Project'). Whilst the LTC project recognises the need for the Project and does not object to it in principle, there remain a number of outstanding concerns about the interface between the two projects.
2. NH LTC submitted a detailed Relevant Representation ("RR") [RR-2215] on 27 November 2025 which appended a table detailing NH LTC's concerns about the Project. That approach was taken because the Applicant's DCO application did not contain the draft Statement of Common Ground which documented those same issues.
3. It is understood that this Statement of Common Ground ("SoCG") is being submitted at Deadline 1 by the Applicant. The document contains all of the same issues raised by NH LTC in its RR, but updated to reflect progress made between the parties since 27 November 2025 in seeking to resolve NH LTC's issues.
4. In order therefore to avoid repetition, this written representation does not repeat the detailed issues as set out initially in the RR, and now in the SoCG. Instead it summarises the main outstanding issues, and then cross refers directly to the SoCG between the Applicant and the NH LTC team, which provides detailed explanation of outstanding concerns.
5. NH LTC notes, from ISH1, that the ExA will be using the WRs to inform its first written questions. NH LTC requests that its key issues, as set out below, are suitably reflected in the ExA's questions to the Applicant, including where additional information is required by NH LTC to fully understand and assess the Applicant's proposals.
6. The interrelationship document planned for submission by the Applicant is a key deliverable for NH LTC in this respect, as is the planned removal of Option B at the Tilbury North substation. Pending sight of these documents, NH LTC reserves the right to expand on its representations detailed below and in the RR and SoCG.

<u>No.</u>	<u>Issue</u>	<u>Relevant SoCG reference</u>
1	<p><b>Programme, including outages</b></p> <p>As well as spatial interfaces between the two projects, there are also temporal ones involving the potential of construction programmes to clash. Of particular concern are the outage dates of both projects and works to UKPN routes. NH LTC remain concerned that its booked outages, required to undertake its own diversions of the NGET networks, potentially conflict with those outages proposed by the Applicant to achieve its own required completion dates. The movement or resequencing of those key dates would give rise to a potentially significant delay (up to an estimated two years) to the delivery of the LTC Project, resulting in a significant increase to its cost.</p> <p>NH LTC requires the Applicant to share with it further details relating to its proposed construction programme and to work with it to ensure that both programmes can co-exist. This information is also needed in order to enable NH LTC to undertake its own risk assessment in relation to the potential reworks and/or abortive works in conflicting areas of works.</p>	<p>3.2.2</p> <p>3.2.4</p> <p>3.2.5</p> <p>3.2.9</p> <p>3.2.15</p> <p>3.2.18</p>
2	<p><b>Overlap of Order Limits</b></p> <p>NH LTC welcomes the Applicant's confirmation that Option A, as it relates to the Applicant's works in the vicinity of Tilbury, is no longer being progressed. However, in the absence of updated application documents, such as Land Plans, Works Plans and the Development Consent Order, NH LTC is unable to fully understand the effect of the Project on the LTC DCO and so reserves its position pending sight of that information.</p> <p>NH LTC therefore requests the Applicant to update their application documents at the earliest opportunity to reflect the changes in their application. Additionally, as mentioned in previous submissions, NH LTC requires the Applicant to provide land overlay plans and work overlay plans in order to demonstrate the interface between the projects clearly.</p> <p>NH LTC also requires the inclusion of suitable protocols in the Applicant's DCO for the management of matters where conflicting interests in land use (permanently, temporarily, geographically, and temporally) remain an issue.</p>	<p>3.2.3</p> <p>3.2.6</p> <p>3.2.7</p> <p>3.2.8</p> <p>3.2.10</p> <p>3.2.20</p> <p>3.2.25</p> <p>3.2.29</p> <p>3.2.30</p> <p>3.2.35</p>
3	<p><b>Tilbury North Substation and Nitrogen Deposition Compensation</b></p> <p>NH LTC considers it clear that sufficient weight was not afforded to the LTC DCO in the option selection process for the location of the Tilbury North Substation, in particular in relation to the lack of consideration given to the LTC Nitrogen Deposition site.</p> <p>NH LTC requires the Applicant to share its option selection process with it more fully, including any technical notes, in order to enable it to appropriately assess the site selection process outcome. In particular, NH LTC requires the Applicant to share the technical note relating to its review of the LTC PAQAP document and its opinion on equivalence.</p>	<p>3.2.12</p> <p>3.2.26</p> <p>3.2.27</p> <p>3.2.39</p>

4	<p><b>Ability of NH LTC to comply with its obligations under the LTC DCO</b></p> <p>The Applicant's DCO does not make appropriate provision to address the impact of the Project on the LTC project to deliver on its obligations under the LTC DCO. As things currently stand, there is a real concern that the LTC project could be in breach of its obligations should the Applicant's DCO be granted in its current form. Further the Applicant's draft DCO does not expressly articulate how the replacement compensatory habitat would vest in NH LTC, and provide the necessary powers to deliver it.</p> <p>The NH LTC team acknowledges that the parties are discussing this matter and NH LTC is preparing a set of proposed DCO drafting amendments that it considers will be necessary.</p>	3.2.38
5	<p><b>Travellers Site at Gammonfields</b></p> <p>NH LTC understands that, the Applicant's confirmation that Option A, as it relates to the Applicant's works in the vicinity of Tilbury, is no longer being progressed, indicates that the interface between the projects in the vicinity of the travellers site at Gammonfields should no longer be an issue. However, until the Applicant has submitted updated documents into the examination, NH LTC cannot remove its objection on this ground.</p>	3.2.23 3.2.24
6	<p><b>Costs</b></p> <p>NH, in its role as the promoter of the LTC project, will incur significant costs as a result of its engagement in the Norwich to Tilbury DCO process, and it will seek to recover these costs under the Infrastructure Planning (Fees) Regulations 2010.</p> <p>NH will also incur additional construction costs as a result of the Applicant's project and it will be seeking to also recover these costs from the Applicant.</p>	3.2.40
7	<p><b>Environmental area north of Brentwood Road</b></p> <p>The proposed area north of Brentwood Road is to be occupied by the LTC project during its construction and may therefore be unavailable for the Applicant in accordance with its programme of works.</p> <p>Whilst the LTC team confirms that they will work cooperatively with the Applicant in relation to this area, the LTC project cannot confirm a date for their vacation at this location.</p>	3.2.28
8	<p><b>Construction Accesses / Shared Access Areas</b></p> <p>There are various areas (including but not limited to Brentwood Road, A122, Buckingham Hill Road, Hoford Road) in which both projects will be active at potentially the same time. The use of these areas will require coordination between both projects to ensure that they are able to co-exist whilst at the same time ensuring appropriate access for local residents and others, as required.</p>	3.2.31 3.2.32 3.2.33 3.2.34 3.2.36 3.2.37

9	<b>Side agreement / protective provisions</b>  NH LTC considers it necessary for there to be specific protective provisions for its benefit in the draft DCO as well as a side agreement to address the overlapping and conflicting elements of the Applicant's Project and the LTC DCO.  This is under discussion between the two parties and further updates will be provided as needed.	3.2.38
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