

**Planning Act 2008**

**The Infrastructure Planning (Examination Procedure) Rules 2010**

**Application by National Grid Electricity Transmission Plc for an Order granting Development Consent for the National Grid Norwich to Tilbury Project**

**Planning Inspectorate Reference Number: EN020027**

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**Deadline 2: Comments on any further information or submissions made by the Applicant and received by deadline 1 submitted on behalf of National Highways Limited**

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## 1 INTRODUCTION

1.1 This document is submitted for Deadline 2 on behalf of National Highways ("NH") in respect of an application by National Grid Electricity Transmission Plc ("**Applicant**") for an order granting development consent for the National Grid Norwich to Tilbury Project ("**DCO**"). The Applicant seeks development consent for proposed authorised development described in Schedule 1 of the draft DCO ("**Authorised Development**"). This document sets out NH's comments on the following documents submitted by the Applicant at Deadline 1:

- (a) Document 8.4.1 (REP-132): Applicant's Comments on Relevant Representations;
- (b) Document 5.9.20 (REP1-049): Draft Statement of Common Ground - National Highways - Tracked Changes Version
- (c) Document 8.7 (REP1-142) Statutory Undertaker Tracker

## 2 NH'S COMMENTS ON THE APPLICANT'S COMMENTS ON NH'S RELEVANT REPRESENTATIONS (PAGES 345-382 OF REP-132)

2.1 NH's comments on the Applicant's Comments on NH's Relevant Representations can broadly be divided into two key areas: (1) technical matters, (2) response on DCO (including Articles and Protective Provisions).

2.2 The Applicant's position is largely that it is liaising with NH to resolve the concerns raised. Whilst NH acknowledges that matters remain outstanding and that negotiations are ongoing or due to commence, there are a number of instances in which NH wishes to respond directly to the Applicant's comments on National Highways' relevant representations.

2.3 NHs' detailed responses to the Applicant's Comments on Relevant Representations are set out in **Appendix 1** to this document where it is considered appropriate to do so. NH does not seek to respond to all matters at this stage, given that negotiations are ongoing. However, NH reserves the right to respond further should issues remain unresolved following discussions.

2.4 In relation to technical matters, NH's advisors are currently reviewing the traffic and transport responses received from the Applicant on NH's Relevant Representations. A response will follow from NH at the next deadline.

2.5 In relation to the DCO, and by way of a summary, the following is noted:-

- (a) Compulsory Acquisition:- NH fundamentally disagree with the Applicant's comment in T1 on page 345 that, "*In relation to concerns regarding National Highways' ability to discharge its statutory duties, it is the Applicant's position that, the acquisition of land or rights should not cause a material detriment to National Highways' ongoing land management and ability to ensure safe and efficient operations*".
- (b) Compulsory Acquisition: in relation to Articles 24, 25 and 26, NH's object to the compulsory acquisition of its land and interests without its consent. NH's consent needs to be secured through the Protective Provisions.
- (c) Articles 11, 13, 14, 16, 17, 18, 20, 21, 22, 27, 28, 29, 30, 38, 39, 40, 41, 44, 45, 49, 50:- The Applicant's response notes that these articles can be dealt with in the Protective Provisions in favour of NH. If suitable Protective Provisions can be agreed which ensure that the rights within the article cannot be exercised without the consent of NH, then this approach is welcomed. A further update will follow as negotiations on the Protective Provisions continue.
- (d) In relation to Article 12, 16, 47, whilst not referred to explicitly in the Applicant's response to NH's Relevant Representations, it is NH's position that these articles could

be dealt with in the Protective Provisions in favour of NH if suitable Protective Provisions can be agreed which ensure that the rights within the article cannot be exercised without the consent of NH.

- (e) Deemed Consent (across multiple articles): NH object to deemed consent. There are safety implications of works being carried out to or under the strategic road network that may have bypassed NH's approval processes. This is a fundamental issue of public safety that should not be comprised to enable a private developer to achieve a quicker build programme. NH has statutory obligations to behave reasonably and support sustainable development and so it should not be forced to work under the pressure of deemed consent. The potential implications from a safety perspective of something going wrong far outweigh the Applicant's case for such a provision.
- (f) In relation to Articles 55 and 58, and Schedule 3, Requirements 4, 7, 8, 9 and 10, and Discharge of Requirements paragraph 1 and 2 please refer to NH's response in the table in **Appendix 1**.

### **3 NH'S COMMENTS ON LATEST DRAFT STATEMENT OF COMMON GROUND – NATIONAL HIGHWAYS – TRACKED CHANGES VERSION**

- 3.1 NH has provided further comments to the Applicant on the Statement of Common Ground to reflect the latest position. However, these were received after the Applicant's internal deadline for updating Deadline 1 documents and they are not therefore reflected in the submitted version. The Applicant has advised NH that an updated version of the Statement of Common Ground will be submitted at the next deadline.

### **4 NH'S COMMENTS ON LATEST STATUTORY UNDERTAKER TRACKER**

- 4.1 Line 15 of the Tracker relates to NH and notes, "*Parties have been in correspondence since July 2025. A meeting is being arranged to discuss National Highways' concerns over Class 1 land take week commencing 23 February 2026 and comments on the draft protective provisions for the week commencing 2 March 2026*". By way of an update, a meeting took place over Class 1 concerns on 26 February 2026. Further meetings are required. In relation to the protective provisions and as noted above, a meeting to discuss the latest draft is scheduled for 16 March 2026.

**APPENDIX 1 – Extract from Document 8.4.1 (REP-132): Applicant's Comments on Relevant Representations and NH's response**

**National Highways Limited**

Table T1.1 outlines the Applicant's comments on the RR provided by National Highways Limited [RR-2657]. The Applicant has held a number of meetings with National Highways Limited during the development of the Project and has been progressing a Statement of Common Ground (SoCG). An updated SoCG is provided to the Examining Authority at Deadline 1 (5.9.20 Draft Statement of Common Ground - National Highways [Revision B]), which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table T1.1 Summary of comments and National Grid's response and NH's response

Topic	Summary of matters raised	National Grid's response	National Highways Response 12 March 2026
Traffic and Transport	<p>1.3 NH objects to the DCO and the Authorised Development for the following reasons:</p> <p>1.3.1 The Transport Assessment and sections of the Environmental Statement, including the Outline Construction Traffic Management Plan, include assessments and conclusions about the forecast impacts of the scheme during construction, including matters which are material to the SRN. Consequently, the DCO includes proposals for mitigation at several junctions on the SRN. However, NH has several concerns with the assessments and is not yet in a position to agree with the conclusions set out in the DCO application documents. Further, it is not yet possible to conclude whether the full impact of the proposed development is properly understood and mitigated. These concerns relate solely to the construction stage of the project.</p>	<p>The Applicant acknowledges National Highways' concern and will continue to engage with National Highways throughout the DCO Examination to resolve the concerns raised. This will be documented in <b>5.9.20 Draft Statement of Common Ground - National Highways.</b></p>	Noted
Key Legislation and Planning Policy Context	<p>[NH objects to the DCO and the Authorised Development for the following reasons:]</p> <p>1.3.2 The Book of Reference as submitted by the Applicant identifies 154 plots of land owned or occupied by NH for the purposes of its undertaking ("Plots") in respect of which compulsory acquisition powers are sought. The compulsory acquisition powers sought are described in the book of reference as Acquisition of Land, Acquisition of Rights: Overhead Line, Acquisition of Rights: Underground Cable System, Acquisition of Rights: Overhead Line and Underground Cable System, Acquisition of Rights: Access, Acquisition of Rights: Drainage and Temporary Use ("Compulsory Powers"). To safeguard NH's interests and the safety and integrity of the SRN, NH objects to the inclusion of the Plots in the DCO and to Compulsory Powers being granted in respect of them. The Plots constitute land acquired by NH for the purpose of maintaining its statutory undertaking and, accordingly, this representation is made under section 127 (Statutory Undertaker's Land) and 138 (Extinguishment of rights, and removal of apparatus, of statutory undertakers etc) of the Planning Act 2008. NH considers that there is no compelling case in the public interest for the Compulsory Powers over the Plots (operational land or otherwise and in relation to rights) land that the grant of the DCO with such provisions would result in serious detriment to the SRN in respect of NH's ability to ensure the safe and efficient operation of the SRN.</p>	<p>In relation to concerns regarding National Highways' ability to discharge its statutory duties, it is the Applicant's position that, the acquisition of land or rights should not cause a material detriment to National Highways' ongoing land management and ability to ensure safe and efficient operations.</p> <p>The Applicant will continue to engage with National Highways regarding all of their individually affected plots and a further meeting has been diarised to take place in February 2026.</p>	NH do not agree for the reasons stated in NH's relevant representation.
Cumulative Effects	<p>[NH objects to the DCO and the Authorised Development for the following reasons:]</p> <p>1.3.3 The Authorised Development will impact on NH's major capital project, the A122 (Lower Thames Crossing) Development, the DCO for which was granted on 25 March 2025 (SI 462). It is necessary for the protection of this project that the Applicant agrees to co-operate with NH in the delivery of the Authorised Development, in a way that safeguards the significant public investment that has been made by NH. A separate Relevant Representation will be submitted by NH as undertaker of the Lower Thames Crossing project, specifically in relation to this project.</p>	<p>The Applicant has provided detailed responses to the Lower Thames Crossing (LTC) Relevant Representations <b>[RR-2215]</b>.</p>	LTC will pick up any response.
Draft DCO	<p>[NH objects to the DCO and the Authorised Development for the following reasons:]</p> <p>1.3.4 The DCO includes a number of provisions which authorise the interference with statutory powers belonging to NH and/or grant the Applicant powers over the SRN which would have significant safety implications if not properly and proportionately controlled through NH's protective provisions. An analysis of the Articles and NH's concerns in relation to the same is included in section 6 of this Relevant Representation.</p>	<p>A response to these issues is appended.</p>	Noted.

Topic	Summary of matters raised	National Grid's response	National Highways Response 12 March 2026
Cumulative Effects	2.7 NH's concerns relate to the potential impact of the proposed development on the SRN, which, in the vicinity of this proposal includes the A47, All, A14, A12, A120, A1089, and a section of the A13.	The Applicant notes this comment and will continue to engage with National Highways to resolve the concerns raised.	Noted
Key Legislation and Planning Policy Context	<p data-bbox="344 254 566 283"><i>Protecting the SRN</i></p> <p data-bbox="344 317 1329 611">3.1 Unlike other statutory consultees involved in the consenting of nationally significant infrastructure projects, NH is a very active promoter of development consent orders and understands keenly the pressures and requirements placed on applicants to balance the delivery of the scheme with the protections afforded to statutory consultees. NH has been at the vanguard of DCO-consented development since the Planning Act 2008 was introduced and has offered many commitments for the protection of electricity and gas apparatus, water and drainage infrastructure, railway undertakings and other infrastructure owned by statutory consultees as a consequence of its own development consent orders. The SRN deserves the same measure of protection, proportionate to the extent of interference caused by the Authorised Development.</p>	The Applicant notes this comment and the Applicant also responds to this point under the heading Draft DCO below.	Noted
Draft DCO	<p data-bbox="344 646 1329 735">3.2 NH understands the need for proportionality in the context of such protections and considers that a proportionate level of protection in all cases and as a minimum standard where there is the potential for impact to the SRN should be the following:</p> <p data-bbox="344 768 1175 798">3.2.1 that NH be held harmless from the impact of third party development;</p> <p data-bbox="344 831 1329 890">3.2.2 that NH procedures put in place for the protection of property and persons are adhered to in accordance with NH's strict requirements on network occupancy;</p> <p data-bbox="344 924 1329 1003">3.2.3 that any works carried out to the highway, on NH land, underneath the highway, above the highway and to apparatus forming part of the highway estate should be certified by NH and approved by NH on completion of the works;</p> <p data-bbox="344 1037 1329 1213">3.2.4 that financial provision should be put in place to ensure that in the event of the Applicant commencing works which may impact the SRN (including for example, underground works beneath the SRN or oversailing above it) and falling into financial difficulty or defaulting on completion of the works, NH has the resources needed to put the SRN and the highway estate into the position it was in before the Applicant commenced works;</p> <p data-bbox="344 1247 1329 1306">3.2.5 that NH be indemnified for any loss or damage to the SRN or the highway estate as a result of the works;</p> <p data-bbox="344 1339 1329 1457">3.2.6 that the Applicant requests approval from NH before exercising any powers under the DCO in relation to the SRN or the highway estate (such approval not to be unreasonably withheld) to enable proportionate rights and reservations to be secured for the protection of the SRN through private treaty;</p> <p data-bbox="344 1491 1329 1570">3.2.7 that emergency procedures be agreed for NH to access the SRN to carry out works or remove dangerous obstacles resulting from the Authorised Development which pose a risk to life.</p> <p data-bbox="344 1604 1329 1661">3.3 These provisions are included in the NH protective provisions, which are appended to this document (Appendix 1).</p>	The draft DCO ( <b>3.1 Draft Development Consent Order [APP-056]</b> ) includes Protective Provisions for the benefit of National Highways in Schedule 16, Part 5. Whilst National Highways' proposed Protective Provisions provided at Appendix 1 of its Relevant Representations are not agreed at this stage, the Applicant will continue to liaise with National Highways to seek to fully agree a set of Protective Provisions that addresses all of National Highways' concerns.	Noted.
Draft DCO	<p data-bbox="344 1696 1329 1902">3.4 NH considers that without the NH protective provisions, there is a considerable risk of serious detriment to the SRN, as any damage or injury to the SRN or wider highway estate would require funding to rectify that is not within NH's budget. There is no recourse to public funding for emergency works of this nature and a reserve of funding is not available. Without prejudice to whether the Authorised Development would cause a serious detriment to the SRN, it remains the case that the public purse should not be left to meet or subsidise costs of impacts caused by third party development to the SRN.</p>	The draft DCO ( <b>3.1 Draft Development Consent Order [APP-056]</b> ) includes Protective Provisions for the benefit of National Highways in Schedule 16, Part 5. The Applicant will continue to liaise with National Highways to seek to fully agree a set of Protective Provisions.	Noted

Topic	Summary of matters raised	National Grid's response	National Highways Response 12 March 2026
Draft DCO	<p>3.5 Further, NH's estate comprises more than just the corpus of the highway (the 'top two spits'). Unlike local roads, where the local highway authority typically controls only the highway strata and sufficient vertical limits above and beneath the highway to maintain necessary apparatus and street furniture, in most cases NH controls the freehold of the land beneath the highway to the centre of the earth and to the heavens above. This estate is held for the benefit of the statutory undertaking, to ensure that the SRN is not compromised and that maintenance or improvement works at any required depth can take place free from risk of trespass or ransom.</p> <p>Where apparatus is co-located in the highway (which is commonplace), that apparatus has been authorised by NH or has been installed through industry standard processes (such as under the New Roads and Street Works Act 1991), where statutory protection is afforded to NH as the highway or street authority. Whilst NH is prepared to grant a sub surface interest or right to co-locate apparatus in the highway, where it is geotechnically possible and respecting other apparatus that is in, on, under or over the highway — the interest must be proportionate and necessary and cannot be to the detriment of NH, the SRN or other undertakers. It cannot be acceptable that apparatus is placed in, on, under or over the SRN through a DCO by disapplying statutory protections that NH has and not accepting to acquiesce to the terms which are required by NH to manage its network in accordance with regulatory requirements.</p>	The Applicant will continue to liaise with National Highways in relation to the acquisition of all necessary land rights in National Highways' estate and will continue to liaise with National Highways to seek to fully agree a set of Protective Provisions for the benefit of National Highways.	Noted
Key Legislation and Planning Policy Context	3.6 For the sake of clarity and transparency, NH has no desire to stymie development or to impose requirements on the Applicant which are disproportionate to the potential harm that could be caused to the SRN. NH is legally obliged to co-operate with third parties exercising planning or highway functions, which includes the Applicant in this statutory process. NH is prepared to engage fully and assist in whatever way is reasonable to ensure that the Authorised Development proceeds as quickly and efficiently as possible.	The Applicant notes this comment.	Noted
Draft DCO	<p>4. The impact of the Proposed Development on the SRN</p> <p><i>Overhead crossings</i></p> <p>4.1.3 For the sections of overhead lines crossing over the top the SRN, a Section 169 Agreement is required with an Approval in Principle by NH. It is understood that this has not yet been undertaken. Therefore, the principle of the crossing the SRN cannot yet be agreed.</p>	The requirement for a Section 169 Agreement, and the details of such engagement, will be detailed and agreed within the Statement of Common Ground, a draft of which has been included in the application for development consent ( <b>5.9.20 Draft Statement of Common Ground - National Highways</b> ).	Noted
Draft DCO	<p><i>Underground crossings</i></p> <p>4.1.4 For the section of underground cabling crossing the A12 an Approval in Principle by NH is required. It is understood that this has not yet been undertaken. Therefore, the principle of the crossing the SRN cannot yet be agreed.</p> <p>4.1.5 NH only permits Trenchless Crossing techniques on the SRN, with Horizontal Directional Drilling the preferred method. 4.1.6 From the information submitted, we are unable to determine the geotechnical risks on the A12. Any proposed directional drilling under the SRN will require compliance with The Design Manual for Roads and Bridges (DMRB) Chapter CD622 (Managing Geotechnical Risk). We advise the Applicant to review the requirements of CD622, which can be found on the Standards for Highways website. Consideration should also be given to the potential impact of drilling upon other SRN assets, such as drainage, with evidence provided for NH's review. Additional asset impact may require further approval processes. NH's standard protective provisions (as appended in Appendix 1) secure these approvals and requirements.</p> <p>4.1.7 All cable works will require monitoring and assurance, with safety risks assessed for monitoring, and survey works within the proximity of the A12 live carriageway.</p>	The Applicant notes National Highways' requirements set out in its Relevant Representation and will continue to liaise with National Highways, as part of the preparation of an Approval in Principle, over the technical detail of the underground crossing of the Strategic Road Network.	Noted
Traffic and Transport	<p>4.2 Traffic and Transport Construction Impacts</p> <p><i>Traffic Assessment - Assumptions</i></p>	4.4.2 — It will be the responsibility of the Main Works Contractor(s) to manage how their workers travel to and from the Project, as set out in the Outline CoCP ( <b>7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-</b>	In relation to all of the traffic and transport responses that follow, these are being reviewed by NH's technical advisors. A response will follow at the next deadline.

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	<p>4.2.2 Assumptions regarding the workforce indicate that overhead line workers would first sign in at their allocated temporary construction compound before travelling on to their work sites, whilst cable and substation workers would travel directly to their respective locations. It is stated within the TA that approximately 10% of workers would be drawn from the local labour market, with the remainder comprising trained specialists sourced from an existing pool of approved contractors. No clear assumptions have been set out on the use of hotels or minibus transport for non-local workers.</p> <p>4.2.3 Access is proposed via primary access routes (PARs) which are defined as routes on the public highway designated for use by construction vehicles (typically for HGVs) to travel from the Strategic Road Network/Major Road Network to the site access point (SAP).</p> <p>4.2.4 Any changes to these assumptions regarding the working hours and sign-in procedures of construction staff could impact the development's trip generation and trip distribution and, therefore, the conclusions reached within the TA. Therefore, NH requests that those items that could impact the conclusions of the TA in respect of traffic volumes on the SRN should be highlighted and included within the Construction Traffic Management Plan (CTMP) and, should any changes be forthcoming, NH should be consulted.</p>	<p><b>311]).</b> Once the location of accommodation for non-local workers is confirmed, appropriate transport options, including the potential provision of staff minibuses, will be considered.</p> <p>4.2.3 — The Applicant notes this comment.</p> <p>4.2.4 — The Outline CTMP (<b>7.3 Outline Construction Traffic Management Plan [APP-309]</b>) sets out how the trip generation has been determined against the draft construction programme and will be therefore subject to change upon finalisation of the construction programme by the Main Works Contractor. The construction workforce traffic movements will be managed through the monitoring and management mechanisms outlined in Section 8 of the Outline CoCP (<b>7.3 Outline Construction Traffic Management Plan - Appendix B Outline Construction Worker Travel Plan [APP-311]</b>). Robust arrangements will be available to monitor and review these traffic movements and the proposed mitigation measures.</p> <p>The Applicant will liaise with National Highways to discuss any changes to the assumptions of construction worker travel during the Examination. This will be documented in <b>5.9.20 Draft Statement of Common Ground -National Highways.</b></p> <p>Section 8 of the CoCP (<b>7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]</b>) details of the mechanism of capturing the workforce actual shift start and end times, which will inform the monitoring review report issued every quarter.</p>	
Traffic and Transport	<p><i>Proposed changes to SRN Roads</i></p> <p>4.2.5 Permanent highway works proposed for the project include widening junctions and lanes to support construction access, including: widening and extending merge lanes at the A120 Hardwick Road/Bentley Road and A12 Ipswich Road/B1070 junction; widening of Bullen Lane, Bentley Road, and Ardleigh Road; and lane marking alterations at the A14 J55 Copdock Interchange. It is not yet clear whether an assessment of compliance with the Design Manual for Roads and Bridges (DMRB) has been undertaken for each of these proposed changes on the SRN. This should be confirmed by the Applicant. If a DMRB assessment has not yet been undertaken, this is required for any proposed changes to the SRN. Details of the proposed changes should be provided to NH for review.</p>	<p>All preliminary designs for proposed changes to the Strategic Road Network (SRN) have been developed in accordance with the Design Manual for Roads and Bridges (DMRB), and subject to Stage 1 Road Safety Audits (RSAs). The Applicant has engaged with National Highways throughout the development of these proposals.</p> <p>Within the RSA1 process undertaken, these preliminary designs were submitted to National Highways for review and acceptance.</p> <p>Notwithstanding the above, the Applicant will continue to engage with National Highways at the next stage of design development and, should a further assessment of compliance with the DMRB be required, will liaise with National Highways to complete this process.</p>	
Traffic and Transport	<p>4.2.6 Road Safety Audits have been carried out for the alterations on the A120/ Bentley Road, A12 on slip at the A12 Ipswich Road/B1070 junction, as well as the Primary Access Route Access from the A120 at Surrex. However, NH notes that no RSA has been received regarding the lane marking alterations at the A14 J55 Copdock Interchange. This will be required to assess the safety impact on the SRN to ensure that the proposed alterations do not result in highway safety issues.</p>	<p>Preliminary design proposals for the lane marking alterations at the A14 J55 Copdock Interchange are being developed, and will be subject to appropriate Road Safety Audits and discussed with National Highways.</p>	
Traffic and Transport	<p>4.2.8 It should be noted that the A120 Colchester Road, Coggeshall, has recently been subject to a permanent speed reduction to 50mph as part of a NH scheme. As a result, the Draft DCO should be updated to reflect the current posted speed limit of 50mph.</p>	<p>The Applicant notes this comment. Traffic Regulation Order Schedule 13 Part 1 of the draft DCO (<b>3.1 Draft Development Consent Order [APP-056]</b>) will be updated (removal of the proposed Traffic Regulation Order to restrict the speed limit to 50 mph).</p>	
Traffic and Transport	<p>4.2.10 NH was not made aware of the requirement for temporary Traffic Regulation changes as part of the pre-application discussions. NH is therefore unable to confirm the acceptability of the changes, having not been advised of their duration and Discussion is required with the Applicant on these matters.</p>	<p>The Applicant notes this comment and would welcome the opportunity for discussion with National Highways on the Traffic Regulation Order proposals.</p>	

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Traffic and Transport	4.2.11 There is also a temporary No Overtaking order proposed on the A120 Colchester Road, Coggeshall Between points THE-001 and TR-E-004 as shown on Section E, Sheet, which requires discussion with NH.	The Applicant notes this comment and would welcome the opportunity for discussion with National Highways on the Traffic Regulation Order proposals.	
Traffic and Transport	<p data-bbox="344 254 566 283"><i>Assessment Scope</i></p> <p data-bbox="344 317 1338 493">4.2.12 The TA contains a list of the SRN junctions assessed by the Applicant's transport consultants and states that this has been agreed with NH. Whilst NH agreed to the list of junctions to be modelled, it was explained that this was not an exhaustive scope and that further junctions may need to be assessed. A list of further junctions which NH considers may be adversely affected by the proposed development and should therefore be modelled is provided in the "Junction Modelling" section 4.2.22 to 4.22.27 below.</p>	The Applicant notes this comment. A response is provided for 4.2.22 and 4.22.27 below.	
Traffic and Transport	<p data-bbox="344 527 492 556"><i>Road Safety</i></p> <p data-bbox="344 590 1338 972">4.2.13 Personal Injury Collision (PIC) data for the SRN has been obtained from DfT Road Safety Data for the four-year period 2019, 2021-2023 at the SRN junctions included in the assessment. NH observes that this timeframe does not include a full five-year period. The Applicant is requested to adopt the standard approach for the PIC analysis to cover a full 60-month period, excluding data gathered between March 2020 and September 2021 (when periods of COVID-19 lockdowns were in place), to better reflect 'normal' road conditions. The analysis of PIC data within the TA notes collision clusters at A14 Junction 50, A14 Junction 52, A14 Junction 55, and A12 Junction 26 where there are notable bends in the road alignment. This analysis could indicate underlying issues with the road layout at these junctions. NH requests that the Applicant investigates any causation factors in the road layout. The PIC analysis should also include any SRN junctions forecast to experience a material increase (&gt;30/peak hour) in traffic flows from the proposed development.</p>	Within the Transport Assessment ( <b>7.11 Transport Assessment [APP-333]</b> ), collision analysis was undertaken for all junctions where the Strategic Road Network (SRN) connected to the Primary Access Routes. The Applicant notes National Highways' request and an update to collision analysis will be undertaken for a full 60 month period following further engagement to agree the analysis period to be assessed (excluding time period indicated as a result of COVID-19 restrictions). A review of SRN junctions to be analysed will be agreed with National Highways.	
Traffic and Transport	<p data-bbox="344 1005 641 1035"><i>Committed Developments</i></p> <p data-bbox="344 1068 1338 1358">4.2.14 Appendix D of the TA contains an overview of the committed developments and transport schemes considered in the assessment of traffic on the PARs. A sifting process has been undertaken to determine whether the developments should be included as a committed development. NH is aware of some large developments, proposed and consented, that do not appear to have been included within the assessment of Committed Developments, such as Tendring Colchester Borders Garden Community, Bathside Bay Container Terminal, and Norfolk Vanguard and Boreas Wind Farms. National Highway, therefore, request that confirmation should be sought from the relevant Local Planning Authorities that all relevant committed developments have been included within the initial assessment.</p>	<p data-bbox="1353 1005 2145 1215">The Applicant has engaged with the Local Highway Authorities and National Highways throughout the Development Consent Order process. This is demonstrated within the <b>6.16.A1 Environmental Statement Appendix 16.1 - Engagement Undertaken Relevant to Traffic and Transport [APP-272]</b> and the <b>7.11 Transport Assessment - Appendix B - Consultation on the Scope of the Assessment [APP-335]</b>.</p> <p data-bbox="1353 1249 2145 1518">As part of this engagement, the Applicant requested a review of those committed developments initially identified for assessment and requested details of any additional developments that may impact the Project. All relevant and known developments that might impact the Primary Access Routes (PARs) or the junctions connecting to the Strategic Road Network/Major Road Network were identified and considered in <b>6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]</b> and the <b>7.11 Transport Assessment - Appendix D -Committed Developments [APP-337]</b>.</p> <p data-bbox="1353 1551 2145 1778">The developments identified by National Highways were not provided to the Applicant as needing to be reviewed as part of the cumulative assessment and are located a notable distance from the PARs. However, a review has been undertaken, and it was found that the Tendring Colchester Borders Garden Community had no formal planning application submitted for any phase of this development at the cut-off stage (1 April 2025). The development would have been excluded from the Project assessment as no traffic flows were publicly available.</p>	<p data-bbox="2160 1812 2822 1959">The construction of the Bathside Bay Container Terminal (BBCT) was anticipated to start in 2024 with Green Energy Hub operation commencing in 2026 (at the earliest). The application for BBCT's Environmental Statement (ES) outlines that '<i>Due to the A120 being a large A-road with little interaction with local sensitive receptors, the</i></p>

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		<p><i>impacts of severance, amenity and highway geometry are considered to be not significant and are scoped out of this assessment</i>. Furthermore, the ES states regarding highways safety that the impacts on highway safety are negligible, i.e. the low magnitude flows are unlikely to lead to cumulative effects. Therefore, this development would have been excluded from the Project assessment due to traffic flows being not significant.</p> <p>The Heavy Goods Vehicle construction routes for both the Norfolk Vanguard and Boreas Wind Farms projects overlap with the Strategic Road Network used by the Project, most notably for the multi-modal assessment. The construction of the Norfolk Vanguard project started in 2023 and is expected to be completed by 2028 prior to the Project's peak construction. For the Boreas Wind Farms Project, the indicative Construction Programme indicates construction would end by 2027. These developments would therefore be excluded from the Project's cumulative assessment as daily movements, where overlapping, would not be significant.</p>	
Traffic and Transport	<p>4.2.15 Additionally, Appendix D of the TA contains a summary of the SRN junctions which are forecast to experience an increase in usage due to the committed developments. Whilst this summary is welcomed, NH consider that it would be useful to provide the numbers, and turning movements, of vehicles at each of the SRN junctions associated with each of the committed developments to better understand the impact of the committed developments at SRN junctions.</p>	<p>The Applicant notes the request for further information relating to traffic flows and movements for committed developments at junctions on the Strategic Road Network impacted by the Project. This information will be provided to National Highways for review.</p>	
Traffic and Transport	<p><i>Trip Generation</i></p> <p>4.2.18 The total daily peak hour construction vehicle trips, for the peak week of construction for each year, are reported in the TA at a county scale, as shown in the table below. This information provides insufficient evidence for the impact on the SRN. Therefore, NH requests that the estimated peak hour trip generation for each construction activity should be presented within the TA. Further, the impact of the construction traffic on individual SRN junctions should also be presented in the TA. This could be through the use of traffic flow diagrams indicating traffic routeing from each PAR.</p>	<p>The Applicant notes the request for further information relating to construction traffic profiles, traffic flows and movements for committed developments at junctions on the Strategic Road Network impacted by the Project. The Applicant will continue to engage with National Highways regarding the required traffic information.</p>	
Traffic and Transport	<p>4.2.19 Additionally, the trip generation associated with worst-case construction activities is only shown for SRN links. No information has been provided regarding the methodology for how trips associated with the development would be distributed and assigned across the road network, nor have the resultant junction trip assignment figures been provided. A detailed trip distribution and assignment methodology should be established in the TA. It is recommended that the number of peak hour construction trips should be presented for the appropriate SRN junctions. Any junction experiencing an increase of 30 vehicles or greater due to the proposed development in a peak hour should be subject to a junction capacity assessment.</p>	<p>The Applicant notes the request for further information relating to trip assignment, construction traffic profiles, traffic flows and movements for committed developments at junctions on the Strategic Road Network impacted by the Project. The Applicant will continue to engage with National Highways regarding the required traffic information.</p>	
Traffic and Transport	<p><i>Trip Distribution/Trip Assignment</i></p> <p>4.2.20 The TA considers that all construction vehicle trips will access the project via PARs, which themselves are accessed from the SRN. The TA does not state how the construction vehicle trips have been distributed from the point that they access the SRN, nor how the construction vehicle trips have been assigned to routes.</p> <p>4.2.21 NH notes that the junction modelling contains turning movements due to development trips at each of the junctions modelled. It is not clear how the turning movements associated with the development trips have been determined. NH requests that full details of the methodology used to distribute construction traffic on the SRN is provided. Information regarding the method used to assign these trips to the SRN should also be provided. NH also requests that traffic flow diagrams are provided to show how</p>	<p>The source of materials was unknown at the time of the development consent application submission. Therefore, assumptions were made on the distribution of the related construction traffic movements at the Strategic Road Network junctions. The Applicant will continue to engage with National Highways regarding the required traffic information.</p>	

Topic	Summary of matters raised	National Grid's response	National Highways Response 12 March 2026
	development trips move through the SRN. These should be used to determine whether any other SRN junctions are required to be modelled.		
Traffic and Transport	<p><i>Junction Modelling - Unsignalised Junctions</i></p> <p>4.2.22 AECOM have undertaken a review, on behalf of NH, of the geometry of the ARCADY and PICADY models and the model build. The traffic flow inputs have not been reviewed as these have not yet been agreed. Additionally, as the trip generation, trip distribution, and trip assignment have not yet agreed, no future scenarios were considered.</p> <p>4.2.23 Although, the junction modelling results for the 2024 Base scenario were provided by the Applicant to NH and have therefore been reviewed, NH considers them to be subject to the agreement of the baseline traffic flow inputs. When considering the baseline traffic flows, NH required evidence of traffic survey data should be provided, alongside any growth factors applied to traffic survey data, and traffic flow diagrams detailing the flow of development traffic through the highway network to be provided.</p>	<p>The Applicant notes the request for further information relating to trip assignment, construction traffic profiles, traffic flows and movements for committed developments at junctions on the Strategic Road Network impacted by the Project. The Applicant will continue to engage with National Highways regarding the required traffic information.</p> <p>The Applicant notes the need for National Highways to review the survey data and growth factors. This information will be provided to National Highways for review.</p>	
Traffic and Transport	<p>4.2.24 NH's position regarding the models and baseline results for each junction assessed by the Applicant is as follows. Please note that "Site" corresponds with references in the Transport Assessment.</p> <p>a) <i>Site 1: A47/Ipswich Road junction</i></p> <p>The review found several discrepancies between the modelled entry radii and the conflict angles for various arms and those determined by AECOM. The effective flare length for the Ipswich Road (N), A47 (NE), and A140 (S) arms are potentially overestimated in the model, and the entry radii for the A47 (NE) and A47 (SW) arms are potentially underestimated in the model. Additionally, differences were found with the conflict angle measurements between those calculated by AECOM and those modelled. Whilst there is a degree of subjectivity involved when determining the model geometry, significant differences in these measurements could lead to unrealistic modelling results. Therefore, NH requests that the CAD file used to inform the model geometry of this junction should be provided for review.</p> <p>NH note that there is no significant queuing showing in the baseline scenario, although these results are, considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved.</p> <p>b) <i>Site 12: All Thetford Bypass/A134/A1066 (Mundford Road) Roundabout</i></p> <p>The review of the geometry found several discrepancies between the effective flare length, entry radii, and the conflict angle for various arms within the model and those determined by AECOM. The effective flare length measurement on the AI 1 Thetford Bypass (E) arm is potentially overestimated, as are the entry radii for the same arm and the All Thetford Bypass (W) arm. The conflict angles on both AI 1 Thetford Bypass arms as well as the A1066 Mundford Road (S) arm are potentially overestimated. Therefore, NH requests that the CAD file used to inform the model geometry of this junction is provided.</p> <p>The results indicate that all of the approaches to this junction operate within or very close to capacity in the AM peak 2024 base scenario, with the highest RFC recorded in the AM peak being 0.85 on the All Thetford Bypass (E) arm. The greatest queue lengths are 5.9 PCUs for the All Thetford Bypass (E) arm in the AM peak and therefore no significant queuing is experienced in the AM baseline scenario. The results also indicate that all of the approaches to this junction operate within or very close to capacity in the PM peak 2024 base scenario with the highest RFC recorded being 0.85 on the All Thetford Bypass (W) arm in the PM peak. The greatest queue lengths are 6.0 PCUs on the All Thetford Bypass</p>	<p>The Applicant notes National Highways' comments on junction geometry at Sites 1, 12, 21, 26, 36, 39, 40, 47, 56, 62.</p> <p>In response, the Applicant has provided National Highways with a schedule of responses and the CAD files and background imagery used for the model geometry.</p> <p>The Applicant acknowledges National Highways' concerns regarding Sites 48 and 89 and will continue to engage with National Highways to resolve the concerns raised.</p> <p>For Site 48: AI 20/Long Green/B11018/Cressing Road junction (Galley's Corner), the temporary impacts of the Project construction phase were modelled using local junction modelling and it is considered that it is proportional to the temporary nature of the impact.</p> <p>For Site 89: A1089/Thurrock Park Way/Dock Road (ASDA Roundabout), the Applicant notes National Highways' comment that whilst the Applicant consider that this level of queueing is considerable, it is noted that the queue does not extend back to the previous junction.</p> <p>The Applicant understands that Site 40: A12 Junction 28 and Site 41: A1341 Via Urbis Romanae / United Way junctions are to be subject to a new highway layout constructed as part of an approved planning application made by others. The new junction layout should be in place prior to the peak construction activity for the Project. The Applicant requested design drawings and modelling for the proposed junction from the Design Consultants to allow for an assessment of potential impact from the Project. However, currently this is still not available due to design updates. Further engagement will be undertaken with National Highways and Essex County Council on this matter.</p> <p>The Applicant also notes National Highways' comments on traffic flow inputs and will continue to engage with National Highways regarding the required traffic information.</p>	

(W) arm in the PM peak and therefore no significant queueing is experienced in the PM baseline scenario. The results are, however, considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved.

c) *Site 21: A14 Junction 50*

This review found several discrepancies for the geometry when compared to those determined by AECOM, particularly the entry radii for the A1120 (NE) arm, the A1120 (S) arm (which appear to be significantly underestimated), and the A14 arm. Additionally, the effective flare lengths for the A1120 (NE) arm and the A14 arm appear to be potentially overestimated, and some discrepancies on the conflict angle were noted too. Therefore, NH requests that the CAD file used to inform the model geometry of this junction should be provided.

The approaches to this junction operate well within capacity in both the am and pm peaks. However, these results are considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved.

d) *Site 26: A14 Junction 52*

This review found several discrepancies between the effective flare length and entry radii for two of the arms and those determined by AECOM, notably the entry radii for the Ipswich Road (E) arm and the B1113 Bramford Road (W) arm, and the effective flare length of the A14 (N) arm and the B1113 Bramford Road (W) arm. Therefore, National; Highways requests that the CAD file used to inform the model geometry of this junction is provided.

The approaches to this junction operate well within capacity in both the am and pm peaks. However, these results are considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved.

e) *Site 36: A12/Ipswich Road junction*

This review found a significant difference in the effective flare length between the developers measurement and AECOM's measurement for the Birchwood Road (E) arm. Therefore, NH requests that the CAD file used to inform the model geometry of this junction is provided.

The approaches to this junction operate well within capacity in both the am and pm peaks. However, these results are considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved.

f) *Site 39: A120/Bentley Road junction*

This review found no significant discrepancies with the model layout or geometry and therefore agree with the model build.

No issues were identified with traffic flows at this junction. However, these results are considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved.

g) *Site 40: A12 Junction 28*

This review found no significant discrepancies in the measurements between those modelled and those calculated by AECOM. However, it is noted that AECOM's measurement for the effective flare length of the A1341 Overbridge

approach to the A12 Junction 28 south roundabout is greater. This is considered unlikely to affect the results of the modelling.

However, AECOM have not been able to review the measurements of the Cuckoo Farm Way arm of the southern roundabout as Google Maps TM imagery is not up to date. Therefore, it would be helpful if the Applicant could provide the CAD file used to inform the model geometry of this junction, so that the geometry of this arm can be verified.

Regarding the North Roundabout, no capacity or queuing issues were identified. However, it should be noted that, should queueing on the Overbridge arm worsen, there is a possibility that the operation of the southern roundabout at A12 Junction 28 could be impacted.

Regarding the South Roundabout, the results indicate that all of the approaches to this junction operate well within capacity in the AM peak 2024 base scenario except the Via Urbis Romanae (south) arm, with the greatest RFC recorded being 0.85 in the AM peak. This arm is part of the local road network. The highest queue lengths are 5.4 PCUs for the A1341 Via Urbis Romanae arm in the AM peak and therefore some queueing is experienced in the AM baseline scenario.

In the PM peak, all of the approaches to this junction operate well within capacity in the PM peak 2024 base scenario, with the exception of the A1341 Via Urbis Romanae arm, with the highest RFC recorded being 1.03 on this arm in the PM peak. The greatest queue length noted is 43.4 PCUs on the Via Urbis Romanae (south) arm in the PM peak and therefore significant queueing is experienced in the PM baseline scenario. However, this queueing occurs on the local road network and is unlikely to affect the SRN so is more of a matter for the Local Highway Authority.

These results are considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved.

*h) Site 47: A120 Coggeshall Road/Great Tey Road junction*

This review found no discrepancies with the model layout or geometry and therefore agree with the model build.

The results indicate that the SRN arms of this junction are operating without capacity issues. However, the results are considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed.

*i) Site 48: A120/Long Green/B11018/Cressing Road junction (Galley's Corner)*

This junction was modelled using ARCADY. AECOM, however, have advised NH that a microsimulation model (using software such as Vissim) would be more suitable to assess the impact at this junction. This is due to the interactions between the Galley's Corner roundabout, the A120/A131 Marks Farm roundabout to the north, and the B1018/Millennium Way roundabout to the south.

NH notes that there is a history of serious congestion in this area, with queues frequently backing between the junctions. This occurs over an extended peak period, with congestion on the A120 eastbound starting early in the afternoon. There is also an early AM peak due to the 'early commute' towards the M11, whilst the presence of the nearby shopping village also results in congestion on a Saturday.

Additionally, whilst the development traffic flows are not agreed at this stage, it is noted from the traffic flow matrices within the Galley's Corner ARCADY model that there approximately 178 vehicles assigned to the Marks Farm roundabout in the AM Peak and approximately 151 in the PM peak. Therefore, NH strongly advises

that a microsimulation model, that includes the A120/A131 Marks Farm and B1018/Millennium Way roundabouts, should be used to assess the impact at this junction and provide assurance that the SRN will not be adversely affected by the development in this area.

j) *Site 56: A120/A131/Pod's Brook Road junction (Panners Roundabout and Great Notley Roundabout)*

The junction is formed of two roundabouts (Panners Roundabout and Great Notley Roundabout) and has been modelled as a single entity, which we welcome. The review found a significant difference between the entry radius for the Pod's Brook Road arm on the North Roundabout (Panners Roundabout) within the model and that determined by AECOM. Whilst AECOM notes that there is a degree of subjectivity involved when determining the entry radii, the significant difference in this measurement could lead to inaccurate modelling results. Therefore, NH requires that consideration is given to this aspect of the geometry of the model, or that the CAD file used to inform the model geometry is provided.

The approaches to this junction operate well within capacity in both the am and pm peaks. However, these results are considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved.

k) *Site 62: A12 Junction 15*

The junction has been modelled as a single entity, which is welcomed. This review found discrepancies between the effective flare length, entry radii and the conflict angle for the A12 eastbound off-slip on the North Roundabout and those determined by AECOM. Therefore, NH requires that consideration is given to these aspects of the geometry of the model, or that the CAD file used to inform the model geometry is provided.

The approaches to both roundabouts this junction operate well within capacity in both the am and pm peaks. However, these results are considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved.

i) *Site 89: A1089/Thurrock Park Way/Dock Road (ASDA Roundabout)*

The ARCADY model for the A1089/Thurrock Park Way/Dock Road (ASDA) roundabout was provided by the Lower Thames Crossing project team.

The results of the modelling indicate that all of the approaches to this junction operate within capacity in the AM peak 2024 base scenario except the A1089 Dock Road North arm, which shows the highest RFC recorded at 0.99 in the AM peak. The greatest queue length is shown to be 23.1 PCUs on the A1089 Dock Road North arm in the AM peak. Whilst we consider that this level of queueing is considerable, we note that the queue does not extend back to the previous junction.

The results also indicate that all of the approaches to this junction operates within capacity in the PM peak 2024 base scenario with the highest RFC recorded being 0.84 on the A1089 Dock Road North arm in the PM peak. The greatest queue length is shown to be 7.1 PCUs on the A1089 Dock Road North arm in the PM peak.

These results are, however, considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved.

Topic	Summary of matters raised	National Grid's response	National Highways Response 12 March 2026
Traffic and Transport	<p>4.2.26 Additionally, a Vissim model has been developed for Site 88: A13/A128/A1013/Brentwood Road (Orsett Cock) junction. This is a partially signalised junction.</p> <p>a) <i>Site 29: A14 Junction 55 (Copdock Interchange)</i></p> <p>This review found a discrepancy between the Do Minimum (DM) model, where Arm 3 Lane 3 does not connect to Arm 8 Lane 1, and in the Do Something (DS) model, where this movement is permitted.</p> <p>Therefore, NH requests that the movements in the DS model should be updated so that it is consistent with the DM model, or that further explanation is provided for this.</p> <p>Furthermore, it is noted that there are several differences in the lane lengths between the modelled measurements and AECOM's measurements, such as Arm 8 Lane 3 where the difference between the respective two is 29.9m. It appears as though the lengths for each of the circulatory lanes have been considered to be identical. However, this is not necessarily the case when considering the available space on a link for vehicles to stack without blocking an exit. Therefore, NH requests that consideration is given to the lane lengths of the circulatory within the model, or that the CAD file used to inform the model geometry is provided. The results of the modelling indicate that the A14 (eastbound) off-slip and A12 (northbound) arms of this junction are forecast to operate with a DoS of 92.1% and 94.3%, respectively in the AM peak. However, we note that the queueing experienced on these arms is able to be contained within the available space. Notable queueing is also reported on the North Circulatory and East Bridge arms of the junction. Should the length of these queues increase, there is a possibility that the operation of both the A12 and A14 could be impacted.</p> <p>The results also indicate that the only arm operating with a DoS of 90% or greater in the PM peak is the A1214 (southbound) arm, which is part of the local road network. As with the AM peak, there is notable queueing on the North Circulatory and East Bridge arms of the junction.</p> <p>The results, however, considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved.</p>	<p>The Applicant notes National Highways' comments on the junction modelling for Sites 29, 38, 46, 90, 88 and has provided responses below.</p> <p>a) <i>Site 29: A14 Junction 55 (Copdock Interchange)</i></p> <p>The movement permitted in the DS model reflects the proposed changes to lane designations on the A12 northbound approach. Currently, the nearside lane (Arm 3 Lane 1) is marked as left-only, and the middle lane (Arm 3 Lane 2) is ahead towards the circulatory. However, downstream markings on the circulatory allow for a two-lane exit onto the A14 eastbound on-slip. Observations indicate that a small proportion of traffic currently uses Arm 3 Lane 2 to join the A14 eastbound, albeit at a lower volume than would be expected if the lane were designated for both ahead and left movements.</p> <p>As part of the mitigation, we propose updating the road markings so that Arm 3 Lane 2 accommodates both ahead and left movements. This change will distribute flows more evenly towards the A14 eastbound and create additional gaps for weaving from Arm 3 Lane 3 into Arm 8 Lane 1. Given the available circulatory length (approx. 190 m between stoplines), it is reasonable to assume that these improvements will enable the weaving movement to operate effectively.</p> <p>We acknowledge the differences noted between the modelled lane lengths and AECOM's measurements. In the current model, total stopline-to-stopline distances have been used, consistent with the assumed connector speed of 35 km/h. To address storage concerns without altering link lengths — which could impact signal offsets — we propose applying an excess queue limit check to ensure that queues do not exceed available storage capacity on circulatory links.</p>	
Traffic and Transport	<p>b) <i>Site 38: A12 Junction 29</i></p> <p>This review found no discrepancies with the model layout or geometry and therefore NH is satisfied with the model build.</p> <p>The modelling results indicate that, in the AM peak, the A120 westbound off-slip and eastern circulatory arms of the junction are forecast to operate with a DoS of greater than 90%. Indeed, these two arms experience the longest queues, but the extent of the queueing on these arms is able to be contained within the link. The only link to experience a queue length greater than the link length is on the A1232 Ipswich Road arm. This link is, however, part of the local road network so would be a concern for the Local Highways Authority rather than NH.</p> <p>In the PM peak, no links within this junction model experience a DoS of 90% or greater, or a MMQ that is greater than the link length.</p> <p>The results are, however, considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed.</p>	<p>b) <i>Site 38: A12 Junction 29</i></p> <p>The Applicant notes that National Highways has confirmed that the model layout and geometry are satisfactory.</p> <p>The Applicant notes the observations regarding the AM peak results, where the A120 westbound off-slip and eastern circulatory arms operate with a Degree of Saturation (DoS) greater than 90%, and that queues on these arms are contained within the available link lengths. We also acknowledge that the only instance of a queue exceeding link length occurs on the A1232 Ipswich Road arm, which forms part of the local road network and would therefore be a matter for the Local Highway Authority.</p> <p>For the PM peak, the Applicant notes that no links experience a DoS of 90% or greater, nor any Mean Maximum Queue (MMQ) exceeding link length.</p>	
Traffic and Transport	<p>c) <i>Site 46: A12 Junction 26</i></p>	<p>c) <i>Site 46: A12 Junction 26</i></p>	

Topic	Summary of matters raised	National Grid's response	National Highways Response 12 March 2026
	<p>AECOM have undertaken a review of the geometry of the A12 Junction 26 LinSig model, against the geometry found within the LinSig model of A12 Junction 26 built by AECOM on behalf of NH. AECOM were commissioned by NH in June 2022 to build this model.</p>	<p>The Applicant's LinSig model geometry differs from AECOM's model and satellite imagery as a weaving connector was included with locked flows for a specific movement based on observed lane flows, which indicated minor weaving at those locations.</p>	
	<p>This review found discrepancies between the Applicant's LinSig model and AECOM's A12 Junction 26 LinSig model. For example, there appears to be a discrepancy between the modelled lane connectors on the circulatory and those present at the junction. These apparent discrepancies are also present when comparing with satellite imagery. Additionally, the modelled length of the overbridge arms appears to be greater than found at the junction when considering the available stacking capacity of these links. Therefore, NH requires that consideration is given to these aspects of the model, or that the CAD file used to inform the model geometry is provided.</p>	<p>The locked flow for the key movement aligns with baseline observations.</p>	
	<p>We also noted that Saturation Flows appear to have been manually input into the model. It is not clear whether this information has been taken from traffic surveys. Please can this be clarified.</p>	<p>While a conflicting weaving connector is not standard practice, it was necessary to reflect actual lane usage at this junction.</p>	
	<p>The modelling results indicate that, in both the AM and PM peak periods, the A1124 Halstead Road (southbound) arm of the junction is forecast to experience a DoS of greater than 90%. The reported queueing on this arm does not, however, extend beyond the length of the link. No other links are reported to have a DoS of 90% or greater in either peak period. The only link to experience a length of queue greater than the link length is on the northern circulatory (A12 EB Internal) arm, which occurs in both the AM and PM peak periods. Excessive queueing at this location could restrict the ability for vehicles to exit the A12.</p>	<p>Discrepancy in length of overbridge arms affecting stacking capacity have been reviewed. Stopleveline-to-stopleveline distances were taken from Google Earth, as connectors rely on travel speeds rather than times.</p>	
	<p>The are, however, considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved.</p>	<p>Using non-blocking storage would distort travel times and queue profiles.</p>	
	<p>AECOM also noted that, during 2024, NH was in the process of undertaking road surfacing works on the A12 in the vicinity of A12 Junction 26. It should be confirmed that the traffic surveys undertaken were not affected by these works. There is a possibility that base traffic flows could be underreported due to those with local knowledge avoiding the area.</p>	<p>The queues displayed by the model are accurate and reflect observed conditions.</p>	
		<p>A CAD file was not available and therefore geometry was derived from Google Earth measurements.</p>	
		<p>Saturation flows were based on video observations from the MCC surveys undertaken in October 2024 where possible. For the remaining lanes, we applied a local adjustment factor in line with Department for Transport guidance (RR67)1 to ensure the flows reflect local conditions and geometry characteristics. Where observations were completely not feasible (due to demand profiles or camera angles), a default of 1,800 Passenger Car Units (PCU)/hr was applied (acknowledged as potentially conservative).</p>	
		<p>The survey company reviewed roadworks prior to commissioning and did not identify any issues at this location during the survey period.</p>	
		<p>No evidence of underreporting was found; the survey conditions were considered valid.</p>	
		<p>The Applicant notes the query on why the queue does not extend beyond the link length despite high DoS on A1124 Halstead Road (southbound). This arm is an entry link and cannot exceed its link length unless severely over theoretical capacity (e.g. &gt;200% DoS). Where video footage is limited it was difficult to see the back of queues. However, absence of measured queue data above 60 m is entirely typical rather than unusual due to lack of suitable positioning of equipment. Nevertheless, the available contextual evidence aligns well with the model output. Google's live traffic colouration for this arm shows slow speeds extending back towards the T-junction. This does not represent stationary queues; Google's red bands indicate reduced movement. A stationary queue of around 100 m at the stopline would naturally result in slow-moving vehicles feeding into it from upstream, and Google's speed-based mapping can easily display a red section longer than the stationary queue itself.</p>	
		<p>The Applicant agrees that excessive queueing on the northern circulatory may restrict vehicles exiting the A12, and could affect the exit towards A1124 Halstead Road northbound.</p>	
		<p>The results have been calibrated and validated against existing conditions and are considered fit for use.</p>	

Topic	Summary of matters raised	National Grid's response	National Highways Response 12 March 2026
Traffic and Transport	<p>d) <i>Site 90: M25 Junction 30</i></p> <p>This review found discrepancies in the connectors within the model and the lane markings present in satellite imagery.</p> <p>Furthermore, there appear to be some significant differences in the lane lengths, specifically Arm 1 Lane 3, Arm 2 Lane 3, and Arm 4 Lane 3 where the differences are over 200m for each arm. Therefore, NH requires that consideration is given to these aspects of the geometry of the model, or that the CAD file used to inform the model geometry is provided.</p> <p>AECOM also noted that Saturation Flows appear to have been manually input into the model. It is not clear whether this information has been taken from traffic surveys. Please can this be clarified.</p> <p>AECOM also noted that the M25 Junction 30 LinSig model has a base year of 2022, whilst all other models reviewed have a base year of 2024. Please can the reason for this and whether it would make a material difference be explained.</p> <p>The modelling results indicate that the M25 northbound off-slip and southern circulatory links are forecast to experience a DoS of greater than 90% in the AM peak. Indeed, these two links experience the greatest reported level of queueing, although the lengths of the queues are not longer than the length of the links.</p> <p>In the PM peak, the M25 northbound off-slip, southern circulatory, and western circulatory links are forecast to experience a DoS of greater than 90%. The reported queueing on these links, however, are all able to be contained within the links.</p> <p>The results are, however, considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved.</p>	<p>Issues highlighted (stacking capacity and exit blocking) reflect potential on-site conditions rather than modelling errors.</p> <p>Worst-case queues exceeding stacking capacity occur on A12 EB Internal (16.1 PCUs in DM and 16.8 PCUs in DS scenarios).</p> <p>The impact of temporary construction traffic is not considered severe enough to warrant further investigation.</p> <p>d) <i>Site 90: M25 Junction 30</i></p> <p>MCC surveys were undertaken at identified junctions in October and November 2024. Originally the Applicant was led to believe that the Lower Thames Crossing project would have a network model that could be used to assess the impact of the Project. However, this was not the case. Due to the required approvals and Project programme, we were unable to commission a MCC survey at Site 90 at the time of the initial modelling exercise undertaken due to the required approvals and programme, and the need to survey within a neutral month as requested by LHA and National Highways. As a result, the model data was extracted from an existing Transport Assessment prepared by others for the London Gateway Logistics Park, LDO 2 planning application, along with the 2022 baseline traffic data. This information was cross-checked against the signal information we received from Connect Plus to ensure consistency and approach was discussed and agreed with National Highways at junction modelling specific meetings.</p> <p>We have subsequently undertaken new traffic surveys at this junction on a typical weekday in October 2025.</p> <p>These updated surveys have allowed us to review the comments raised by AECOM and National Highways. As</p> <p>part of this review, we will ensure that link lengths and geometry are correct in the updated model.</p> <p>Original lane lengths were measured stopline-to-stopline using Google Earth.</p> <p>Entry links were initially set to default lengths; these will be updated where necessary in the revised model.</p> <p>The updated model will reflect accurate measurements and address discrepancies noted in the review.</p> <p>The original model included weaving connectors to reflect observed traffic behaviour on a large spiral-marked roundabout.</p> <p>These will be reviewed and adjusted if required based on updated survey data.</p> <p>Saturation flows were based on video observations where possible or factored RR67 calculations using</p> <p>information from observed approaches with similar conditions.</p>	

Topic	Summary of matters raised	National Grid's response	National Highways Response 12 March 2026
		<p>Where observations were not feasible as video footage was not available to review, defaults of 1,900 PCU/hr were applied, which is standard for large roundabouts such as those on the M25.</p> <p>The original base year of 2022 was used because traffic surveys were not available at the time, and data was sourced from a Transport Assessment prepared for the London Gateway Logistics Park, LDO 2 to support the planning application.</p> <p>The model has been updated to a 2025 base year to utilise the latest traffic data obtained and updated traffic flow data received from the Lower Thames Crossing (LTC) Transport Team.</p> <p>We will provide an updated model incorporating revised geometry, link lengths, and validated traffic flows.</p>	
Traffic and Transport	<p>e) <i>Site 88: A13/A128/A1013/Brentwood Road (Orsett Cock) junction</i></p> <p>Whilst the Orsett Cock junction is part of the Major Road Network (MRN), as opposed to the SRN, it is located approximately 1.5km to the east of the SRN. Therefore, we have undertaken a high level review of the results of the Vissim modelling undertaken at this junction to determine whether queueing at this junction could impact the operation of the SRN. It should be noted that AECOM's high-level review has taken the reported queueing figures at face value, and no review of the model or the trip demand at the junction have been undertaken.</p> <p>The forecast queue lengths on the A13 eastbound off-slip arm of this junction are all less than 100m, compared to the length of the off-slip arm of approximately 340m. We have concluded therefore that there is unlikely to be an impact on the operation of the SRN due to queueing experienced at this junction.</p>	<p>e) <i>Site 88: A13/A128/A1013/Brentwood Road (Orsett Cock) junction</i></p> <p>The Applicant notes National Highways' comment that the key issues at this site impact the local road network and are unlikely to be an impact on the operation of the Strategic Road Network. Subsequent to the submission of the development consent application, the Applicant has updated the modelling for this junction following further engagement with the LTC Transport Team. Engagement with the LTC Team regarding mitigation at this junction is ongoing. Further engagement with National Highways and Thurrock Council will be undertaken and updated modelling provided for review.</p>	
Traffic and Transport	<p><i>Junction Modelling - Summary</i></p> <p>4.2.27 AECOM's review of the junction models suggests discrepancies in the constructions of the models of the following locations:</p> <ul style="list-style-type: none"> <li>• A47/Ipswich Road junction</li> <li>• All Thetford Bypass/A134/A1066 (Mundford Road) Roundabout</li> <li>• A14 Junction 50</li> <li>• A14 Junction 52</li> <li>• A12/Ipswich Road junction</li> <li>• A12 Junction 28</li> <li>• A120/A131/Pod's Brook Road junction (Panners Roundabout) and A120/A131/B1256 junction (Great Notley Roundabout)</li> <li>• A12 Junction 15</li> <li>• A1089 Dock Road North/Amazon UK Service Access/Dock Road South/A1089 St Andrew's Road/Thurrock Park Way junction (ASDA Roundabout).</li> <li>• A14 Junction 55 (Coppdock Interchange)</li> <li>• A12 Junction 26</li> <li>• M25 Junction 30</li> </ul> <p>Further information and/or modelling is required to address the issues raised.</p>	<p>The Applicant notes National Highways' comments on junction geometry and queue length discrepancies (see comments provided for 4.2.24 and 4.2.26).</p> <p>The Applicant has provided National Highways with the CAD files and background imagery used for the model geometry.</p> <p>The Applicant will continue to work with National Highways' consultants to resolve these comments.</p>	
Traffic and Transport	<p>4.2.28 The initial review suggests that there may be potential concerns with congestion and queuing at the following locations:</p> <ul style="list-style-type: none"> <li>• All Thetford Bypass/A134/A1066 (Mundford Road) Roundabout</li> <li>• A12 Junction 28</li> </ul>	<p>The Applicant notes National Highways' comments on junction geometry and queue length discrepancies (see comments provided for 4.2.24 and 4.2.26).</p>	

Topic	Summary of matters raised	National Grid's response	National Highways Response 12 March 2026
	<ul style="list-style-type: none"> <li>• A1089/Thurrock Park Way/Dock Road (ASDA Roundabout)</li> <li>• A14 Junction 55 (Copdock Interchange)</li> <li>• A12 Junction 26</li> <li>• M25 Junction 30</li> </ul> <p>NH recommends an early discussion with the Applicant following submission of this Relevant Representation to seek resolution of these issues.</p>	<p>The Applicant has provided National Highways with the CAD files and background imagery used for the model geometry.</p> <p>The Applicant will continue to work with National Highways' consultants to resolve these comments.</p>	
Traffic and Transport	<p>4.2.29 NH strongly recommends a microsimulation model is applied to the following locations collectively:</p> <ul style="list-style-type: none"> <li>• A120/Long Green/B11018/Cressing Road junction (Galley's Corner)</li> <li>• A120/A131/B1256 (Marks Farm) Roundabout</li> <li>• B1018/Millennium Way</li> </ul>	<p>The Applicant modelled the Project's construction phase using local junction modelling and considered that this approach is proportional to the temporary nature of the impact.</p> <p>A meeting has been held to discuss this matter with National Highways, at which a request for construction traffic profiles was requested. The Applicant will continue to engage with National Highways regarding the required traffic information.</p>	
Traffic and Transport	<p>4.2.30 NH considers that addition modelling may be required at the following locations, subject to agreement of the trip generation and distribution methodology and outputs:</p>	<p>The Transport Assessment <b>(7.11 Transport Assessment [APP-333])</b> identified the methodology for the selection of junctions to be modelled which involved a sifting process carried out to identify the sensitive junctions based on existing congestion or potential capacity issues due to the increase in traffic on certain approaches. The sifting process did not take into account the expected increase in traffic volumes (absolute or percentage) as a criterion for selecting or excluding junctions. This sifting approach was shared and agreed in principle with the Local Highway Authority (LHA) and National Highways at thematic group meetings.</p> <p>The selection methodology and list of junctions deemed sensitive through the sifting process was provided for review by LHA and National Highways at the thematic group meeting held in April 2024, and feedback was used to refine the final selection. As a result of this engagement, several additional junctions were incorporated into the assessment scope, e.g. M25 J30 which does not connect to a Primary Access Route.</p> <p>The Applicant presented an early draft of the Transport Assessment <b>(7.11 Transport Assessment [APP-333])</b> to the LHAs and National Highways at the Thematic Group Meeting in January 2025 and again ran through the methodology of junction sifting process, junction assessment methodology and cumulative assessment. Feedback was requested from LHA and National Highways in February 2025, and a response was provided to the Applicant from National Highways in April 2025. As agreed, the Applicant is committed to working with National Highways to discuss this matter further.</p>	
Traffic and Transport	<ul style="list-style-type: none"> <li>• A11 Wymondham Bypass/Browick Road (Browick Road Interchange)</li> </ul>	<p>A11 Wymondham Bypass/Browick Road</p> <p>This junction did not show any capacity issues during the AM or PM peak periods as per Google Typical Traffic information. The expected maximum number of vehicles is 21 Heavy Goods Vehicles (HGVs)/h entering the junction from Wymondham Road and 21 HGVs/h exiting onto Wymondham Road over a short two-week period. Given current capacity and the short temporary impact, modelling of the junction is not considered necessary by the Applicant.</p>	
Traffic and Transport	<ul style="list-style-type: none"> <li>• A12 Junction 21 (Merge/Diverge assessment)</li> </ul>	<p>A12 J21 (Merge/Diverge assessment)</p> <p>During the sifting process, the A12 widening scheme documentation was reviewed. This junction was part of the improvements of the scheme; in particular, it also proposed a change of highway layout. As</p>	

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Traffic and Transport	<ul style="list-style-type: none"> <li>A12 Junction 14 (Ivy Barns Lane/ Wantz Road/ Writtle Road junction)</li> </ul>	<p>A12 J14 (Ivy Barns Lane/Wantz Road/ Writtle Road junction)</p> <p>This junction will not be used by construction traffic relating to the Project. Therefore, modelling of the junction was not required. All Abnormal Indivisible Load (AIL) movements will be coordinated through the Electronic Service Delivery for Abnormal Loads (ESDAL) system and in coordination with the Local Highway Authorities, to reduce disruption where possible. Further details can be found within the Outline CTMP <b>(7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310])</b>.</p>	
Traffic and Transport	<ul style="list-style-type: none"> <li>A12 Junction 31, Holton Saint Mary</li> </ul>	<p>A12 J31 Holton Saint Mary</p> <p>This junction was included as part of the preliminary assessment undertaken following the sifting process. It was found that the junction capacity should be able to accommodate the peak construction flows, and junction modelling was therefore not required. Details can be found within the Transport Assessment <b>(7.11 Transport Assessment - Appendix F - Junction Capacity Assessment [APP-339])</b>.</p>	
Traffic and Transport	<ul style="list-style-type: none"> <li>A12/Turnpike Close junction, immediately to the north of A12 Junction 29 (Merge assessment)</li> </ul>	<p>A12/Turnpike Close immediately to the north of A12 Junction 29 (Merge assessment)</p> <p>This slip road was not identified as having capacity issues during the AM or PM peak periods during the initial assessment. The expected maximum number of vehicles entering the A12 will be 6-7 HGVs/h over a short four-week period. Given the existing capacity of the slip road, and the low number of construction peak hour traffic expected, modelling of the slip road is not considered necessary by the Applicant.</p>	
Traffic and Transport	<ul style="list-style-type: none"> <li>A12 Junction 25.</li> </ul>	<p>A12 J25</p> <p>During the sifting process, junctions that were improved as part of the A12 widening scheme were not considered as having potential capacity issues as the A12 scheme improved capacity. As the A12 scheme was withdrawn in July 2025, just prior to development consent application submission, it was not possible to carry out further assessment of this junction. The Applicant would welcome engagement with National Highways on this matter to allow the junction to be modelled and the impact of the Project to be identified and suitable mitigation proposed where required.</p>	
Traffic and Transport	<p>4.2.31 NH notes specifically that A12 Junction 25 is included within assessments such as the PIC analysis but is not included within the list of SRN junctions that have been modelled. NH requires a justification to be provided for any junctions scoped out of the modelling exercise that are expected to see a material increase in trips due to the proposed development. It is noted that, from the information provided in the junction modelling traffic flows, A12 Junction 25 is expected to be impacted by over 120 trips in both the AM and PM peaks, which would suggest a junction capacity assessment is required.</p>	<p>Within the Transport Assessment <b>(7.11 Transport Assessment [APP-333])</b>, Personal Injury Collision data was shown for all Primary Access Routes and their connection to the Strategic Road Network/Major Road Network. During the sifting process, junctions that were improved as part of the A12 widening scheme were not considered as having potential capacity issues as the A12 scheme improved capacity and would likely be able to accommodate the anticipated number of construction vehicles which use all approaches. As such, this junction was not highlighted by National Highways as a concern during thematic group meetings when</p>	

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Traffic and Transport	<p>4.3 Environmental Statement (ES)</p> <p><i>6.16 ES Chapter 16 — Traffic and Transport Paragraph</i></p> <p>16.8.2 states that number of HGV movements would be re-examined when the appointed Main Works Contractor(s) has sufficiently progressed its construction method and detailed programming of the works. NH should be notified of any changes to HGV trip generation. Should changes to the number of HGV movements be forthcoming, additional junction modelling may be required which should be agreed with NH.</p>	<p>the junction selection process and short list was reviewed with the assumption of the junction upgrade being in place.</p> <p>However, as the A12 scheme was withdrawn in July 2025, just prior to development consent application submission, it was not possible to carry out further assessment of this junction. The Applicant would welcome engagement with National Highways on this matter to allow the junction to be modelled and the impact of the Project to be identified, with suitable mitigation proposed where required.</p> <p>The Applicant is engaged with the Main Works Contractor(s) regarding the construction programme and associated trip generation. The Main Works Contractor(s) are aware of the trip generation levels which were included within the junction modelling assessment. Initial discussions and assessments undertaken with the Main Works Contractor do not indicate any increases in trip generation.</p> <p>The monitoring and management principles detailed within the Outline CTMP (<b>7.3 Outline Construction Traffic Management Plan [APP-309]</b>) include monitoring of the number of construction vehicles utilising the Primary Access Routes throughout construction. It is anticipated that the Main Works Contractor(s), in partnership with the Local Highway Authority, will monitor key junctions on the network where temporary or permanent mitigation has not been proposed.</p> <p>The requirement for any additional junction modelling will continue to be discussed with National Highways in the context of the Statement of Common Ground between National Grid and National Highways.</p>	
Cumulative Effects	<p><i>6.17 ES Chapter 17 — Cumulative Effects</i></p> <p>No additional information has been provided regarding cumulative impacts relevant to NH as the Zone of Influence of the Traffic and Transport chapter of the Environmental Statement is limited to the PARs NH requests that the scope for assessment of the cumulative effects of the construction should be extended to include points on the SRN where a material development impact is forecast.</p>	<p>The cumulative effects assessment has been undertaken in accordance with the Scoping Report (<b>6.19 Scoping Report [APP-288 — APP-296]</b>) and Scoping Opinion (<b>6.20 Scoping Opinion [APP-297]</b>). National Highways were consulted as part of the scoping process and during statutory consultation; however, this point was not raised.</p> <p>The impact on those sensitive SRN junctions connecting to the Primary Access Routes has been assessed within the Transport Assessment (<b>7.11 Transport Assessment [APP-333]</b>) and considers the cumulative flows from other developments. An assessment of the temporary impact of the Project construction traffic on key Strategic Road Network (SRN) links can be found within the Transport Assessment (<b>7.11 Transport Assessment [APP-333]</b>). The assessment summarises the forecast changes in traffic flow by direction on key SRN segments during the peak construction year and within the AM and PM peak hours. The change is shown for total traffic flow and for Heavy Goods Vehicles for the Project. The Applicant will continue to work with National Highways' consultants to presents findings of the cumulative assessment undertaken on the wider SRN network.</p>	
Traffic and Transport	<p>4.4 Construction Management Documents</p> <p><i>7.3 - Outline Construction Traffic Management Plan (OCTMP):</i></p> <p>4.4.1 We note the following proposed junction capacity measures are put forward in the OCTMP:</p> <ul style="list-style-type: none"> <li>• A47/A140 — Temporary signage to warn of peak hour congestion</li> <li>• A14 J55 Copdock — Change to lane and destination arrow markings on the A1214 and A12 approaches to the roundabout, and on the circulatory carriageway.</li> </ul>	<p>The Applicant notes this comment.</p> <p>The Applicant will continue to liaise with National Highways during the Examination to discuss and agree the junction capacity mitigation measures. This will be documented in <b>5.9.20 Draft Statement of Common Ground - National Highways.</b></p>	

Topic	Summary of matters raised	National Grid's response	National Highways Response 12 March 2026
	<ul style="list-style-type: none"> <li>• A120 Harwich Road/Bentley Road - Widening of junction bellmouth and lengthening of merge taper onto A120 NB mainline</li> <li>• A120 Ardmoleigh Crown Interchange — Further discussions to be undertaken with LHA/NH. The proposed mitigation is to be agreed with the LHA and finalised within the CTMP.</li> <li>• A12 Eight Ash Green Interchange — Signal Optimisation</li> <li>• A120 Coggeshall Road/Great Tey Road — Further discussions to be undertaken with LHA/NH. The proposed mitigation is to be agreed with the LHA.</li> <li>• A120 Braintree Bypass/B1018 Braintree Rd — Further discussions to be undertaken with LHA/NH. The proposed mitigation is to be agreed with the LHA.</li> <li>• M25 J30 - Signal Optimisation</li> </ul> <p>4.4.2 The changes to the A120/Bentley Road junction agreed to support the Five Estuaries and North Falls Offshore Wind Farms are included in the OCTMP.</p> <p>4.4.4 The measures listed above are to be discussed and agreed with NH</p>		
Traffic and Transport	4.4.5 NH advises that Walking, Cycling, and Horse-riding Assessment and Reviews (WCHAR) are needed at any point on the SRN where changes are proposed.	<p>A WCHAR has been prepared for the following locations where changes to the Strategic Road Network are proposed:</p> <ul style="list-style-type: none"> <li>• A120/ Bentley Road</li> <li>• A12 on slip at the A12 Ipswich Road/B1070 junction.</li> </ul> <p>The Applicant will issue the WCHARs to National Highways and will continue to liaise with National Highways to address any comments on the WCHARs so that these can be approved.</p>	
Traffic and Transport	4.4.6 National Highways welcomes the measures included in the OCTMP to manage traffic to the levels forecast in the TA and the proposals for enforcement. It is noted that interventions to address any non-compliances will be agreed with the Local Highways Authority. Please can the Applicant confirm that this is intended to include National Highways.	The Outline CTMP ( <b>7.3 Outline Construction Traffic Management Plan [APP-309]</b> ) sets out that, where non-compliances are identified, the Applicant will carry out an investigation to identify appropriate corrective actions. Where needed, corrective actions will be agreed with the relevant Local Highway Authority (LHA) and/or community members prior to implementation. Where a corrective action is identified, the LHA will be informed. It is assumed that, in relation to these actions, the reference to LHA includes National Highways.	
Traffic and Transport	4.4.8 NH notes that the trip generation exercise, as presented in the TA, has assumed that construction worker vehicles would have an occupancy of two, and office-based staff would have a vehicle occupancy of one. A vehicle occupancy of 1.3 personnel per car roughly equates to four staff across three cars (two of every three vehicles would be single occupancy vehicles). As the total numbers of construction staff and office-based staff are not known, it is not clear how the minimum average occupancy target of 1.3 personnel per vehicle was derived. NH requests that the staff vehicle occupancy figures used to inform the traffic impact assessment of the development is explained.	<p>The target occupancy rate of 1.3 was taken as best practice for the minimum target within the Bramford to Twinstead Development Consent Order Construction Traffic Management Plan [EN020002].</p> <p>Section 6.4 of the Transport Assessment (7.11 Transport Assessment [APP-333]) provides an overview of the construction staff occupancy assessments. The office-based staff uses a vehicle occupancy of one as a worst case, as less information about their movement patterns are known. The Overhead Line and Cables and Substation workers are assumed to stay in similar hotels, and hence a vehicle occupancy of two has been used, with an inherited level of car sharing assumed. Information was made available from the technical teams that confirmed they would sign in at a main site before travelling to their working location, with this travel being completed in crew vans.</p>	
Traffic and Transport	<p>5.2.4 OCTMP Appendix B - Outline Construction Worker Travel Plan (OCWTP)</p> <p>4.4.9 Whilst NH welcomes the measures set out in the OCWTP to encourage sustainable travel, they do not provide the necessary assurances that the proposed occupancy target of 1.3 personnel per vehicle is achievable. This is due to the remote nature of the construction compounds and requirement for staff to work in various locations across the project of the lifecycle of the construction. Once the vehicle occupancy has been explained and agreed (as requested above), it is recommended that this should be explored further with NH.</p>	The Applicant notes this comment and will continue to liaise with National Highways during the Examination to discuss the methodology and assumptions relating to construction worker travel. This will be documented in <b>5.9.20 Draft Statement of Common Ground - National Highways</b> .	

Topic	Summary of matters raised	National Grid's response	National Highways Response 12 March 2026
Traffic and Transport	<p>7.3 - OCTMP Appendix A - AIL Access Strategy</p> <p>4.4.10 NH understand the project will require abnormal loads for specific equipment and materials to the site on the SRN. It should be noted that approval to move by road is not automatic. NH implements a Water Preferred Policy which promotes use of water transport for the largest/heaviest abnormal loads (such as nearest suitable coastal ports, inland water/ rivers, beach landings). This is intended to keep the road usage to a minimum wherever possible to minimise disruption to other road users. Once a strategy for movement has been agreed, we issue what is called an 'Agreement in Principle'. This is in addition to any route feasibility work that we may agree to carry out.</p> <p>4.4.11 As stated within the Application documents, a specialised haulage service will be appointed to allow Abnormal Indivisible Loads (AILs) to be transported, with the necessary escort, permits and traffic management in place. The Applicant will consult with the relevant highways authorities to ensure the correct permits are obtained. The police will also be given advanced notification under the Road Vehicle Authorisation of Special Types Order 2003.</p> <p>4.4.12 The Applicant has been in discussions with NH regarding a number of potentials AIL routing strategies. NH have identified the potential requirement for some structural surveys for structures along the desired routes. This is understood to be taking place following the completion of the DCO when the known haulage service has been appointed and final routes have been finalised.</p> <p>4.4.13 NH must be contacted 8-10 weeks prior to the planned movement, at which point the haulier should initiate contact. During this period, route suitability will be reassessed in coordination with all relevant structure owners and highway authorities. An application must then be submitted to NH, and if approved, the permit will be valid for six months. The Applicant should note that there remains a legal obligation to notify us of the exact date and time of each movement at least 5 days in advance.</p>	<p>The Applicant notes this comment and will continue to coordinate with National Highways regarding the transportation of abnormal loads, including obtaining the necessary escorts and permits, as noted in the Outline CTMP Abnormal Indivisible Load (AIL) Access Strategy (7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]).</p> <p>The schedule of AIL movements is anticipated to be further developed and shared when appropriate, following confirmation of the construction programme by the Main Works Contractor(s). This includes formal notification of abnormal load movements through the Electronic Service Delivery for Abnormal Loads (ESDAL) system and will follow all formal processes required, which encompasses verification of structures along the access routes prior to movements taking place.</p> <p>Notwithstanding this, the Applicant would welcome further discussion on an agreed approach for completing structural surveys.</p>	
Compulsory Acquisition	<p><b>5 Compulsory Acquisition</b></p> <p>5.1 The Applicant's draft DCO includes powers of compulsory acquisition and temporary possession and the acquisition of rights in respect of a significant number of land interests owned by NH as referred to in the Book of Reference. The land information provided in the Book of Reference is in a format which makes it extremely and disproportionately onerous for NH to check the ownership status of each land parcel, given the large number of plots involved. Therefore, NH requires that the Applicant provides the shape files to enable the information to be cross-referenced accurately. Once the shape file is received, NH will undertake checks of the information provided to ascertain whether NH assets and operations would be adversely affected by the proposals and whether there are additional interests impacted by the development that are omitted from the Book of Reference. Once adequate information is received, it is NH's intention to respond fully to the proposed Compulsory Acquisition of its land and rights on a plot by plot basis.</p> <p>5.2 In the meantime, it is noted that there are proposals to permanently acquire the freehold interest of NH land. NH object to the compulsory acquisition of operational land to ensure that the safe and efficient operation of the SRN can be maintained by NH. Some of the plots pertain to operational Highway and compulsory acquisition of such land is unacceptable and would prevent NH from discharging its statutory duties.</p>	<p>The Applicant have shared Shapefile information with National Highways and will liaise with National Highways to seek to address their concerns with the impact of compulsory acquisition and temporary possession powers on National Highways' operational land.</p>	<p>NH are reviewing the information supplied . From NH's review to date NH is struggling to understand the need for compulsory acquisition powers in relation to a number of the plots. For example over head lines are capable of being installed pursuant to NRSWA. A full plot-by-plot response will follow.</p>
Draft DCO	<p><b>6 Draft DCO</b></p> <p><i>[National Highways has provided a detailed commentary on the drafting of the DCO with suggested amendments. This is not replicated in detail in this document to aid legibility]</i></p>	<p>A response to these issues is appended.</p>	<p>Please see table below.</p>
Draft DCO	<p><b>8 Protective Provisions and Appendix 1 [Draft Protective Provisions]</b></p>	<p>The Applicant has included Protective Provisions for National Highway's benefit in the draft DCO (3.1 Draft Development Consent Order [APP-056]) in Schedule 16, Part 5. Whilst National Highways' proposed Protective Provisions provided at Appendix 1 of its Relevant</p>	<p>Noted.</p>

Topic	Summary of matters raised	National Grid's response	National Highways Response 12 March 2026
	<i>[National Highways has provided draft Protective Provisions at Appendix 1 of its Relevant Representation, and a detailed justification for the Protective Provisions in Section 8. This is not replicated in detail in this document to aid legibility.]</i>	Representations are not agreed at this stage, the Applicant is continuing to liaise with National Highways to seek to fully agree a set of Protective Provisions.	

Table T1.2 National Grid's response to Section 6 of National Highways' Relevant Representation and NH's response.

Article/ Sch	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response	National Highways Response 12 March 2026
Article 11: Street Works	<p>(1) The undertaker may, for the purposes of the authorised development, or for purposes ancillary to it, enter upon so much of any of the streets specified in column (2) of Schedule 5 (streets subject to street works) as is within the Order limits and may without the consent of the street authority:</p> <p>a) break up or open the street, or any sewer, drain or tunnel within or under it;</p> <p>b) tunnel, drill or bore under the street, or carry out any works to strengthen or repair the carriageway;</p> <p>c) remove or use all earth and materials in or under the street;</p> <p>d) place and keep apparatus in the street (including signage);</p> <p>e) maintain, renew or alter apparatus or furniture (including signage) in or on the street or change its position;</p> <p>f) reinstate or construct new pavement;</p> <p>g) execute any works to provide or improve sight lines required by the highway authority;</p> <p>h) execute and maintain any works to provide, renew or alter hard and soft landscaping, drainage and any other works for the benefit or protection of the environment;</p> <p>i) carry out re-lining and placement of new temporary markings; and</p> <p>j) execute any works required for or incidental to any works referred to in sub-paragraphs (a) to (i).</p> <p>(2) subject to the consent of the street authority, which consent must not be unreasonably withheld or delayed, the undertaker may, for the purposes of the authorised development, or for purposes ancillary to it, enter on so much of any other street whether or not within the Order limits for the purposes set out above and paragraph 3 of article 8.</p> <p>(3) If a street authority that receives an application for consent under paragraph (2) above fails to notify the undertaker of its decision within 28 days that authority will be deemed to have granted consent</p>	<p>This article gives the Applicant the power to break open the streets, place and keep apparatus in or under the street etc to those streets referred to in column (2) of Schedule 5. The Schedule includes the A12 Ipswich Road, the A12, the A120 Ipswich Road, the A13 Stanford Le Hope Bypass and the A1089 Dock Approach Road which form part of the strategic network that NH is responsible for at the following locations marked on the Access, Rights of Way and Public Rights of Navigation Plans</p> <ul style="list-style-type: none"> <li>• Section C, Sheet 8</li> <li>• Section C, Sheet 16</li> <li>• Section G, Sheet 1</li> <li>• Section H, Sheet 4</li> <li>• Section H, Sheet 7</li> </ul> <p>This article will give the applicant the power to break open the streets, place and keep apparatus etc. beneath the above mentioned roads.</p> <p>Additionally, please note it is NH's requirement that any apparatus installed under the strategic road network is carried out by Horizontal Directional Drilling (HDD) rather than an open cut method to minimise disruption to road users.</p> <p>As the highway authority for the A12, A120, A13 (in part) and A1089 NH must have control over the operations being carried out on and under its network in order to comply with its duty to co-ordinate the execution of works of all kinds (including works for road purposes) under section 59 of the New Roads and Street Act 1991. Road space booking will be required in connection with these works so NH can comply with this duty. This is critical from a safety perspective and to protect the structure of the street and the integrity of apparatus in it.</p> <p>Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.</p> <p>Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.</p> <p>Such consent should not be subject to deemed consent. Please see comments in this regard below.</p> <p>In addition, the general power to enter on so much of any other street whether or not within the Order limits for the purposes set out in 11(1)(a) to (j) and the deemed consent provisions is unacceptable. Whilst the need for flexibility is acknowledged, NH must have control over the operations being carried out on and under its network to ensure the safe operation of the SRN.</p>	<p>National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.</p>	<p>NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.</p> <p>Deemed consent is not agreed by NH and the Protective Provisions will need to disapply all references to deemed consent.</p>
Article 12: Application of the Permit Schemes	<p>This article deals with the relationship between the Order powers and the traffic management permit schemes operated by Norfolk County Council, Suffolk County Council, Essex County Council and Thurrock Council (together "the Permit Schemes").</p>	<p>NH would welcome confirmation that permit schemes for the purposes of this article do not apply to NH.</p>	<p>The Applicant can confirm that the Permit Schemes do not apply to the Strategic Road Network.</p>	<p>NH welcomes this confirmation and this should also be confirmed through the Protective Provisions.</p>

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	Article 12(1) confirms that the Permit Schemes apply and will be used by National Grid (or, where appropriate, UKPN) in connection with the construction and maintenance of the authorised development, subject to the qualifications in paragraphs (2) and (3).			
Article 13: Application of the 1991 Act	This article sets out how the 1991 Act will apply to the authorised development.	<p>NH object to the automatic disapplication of the provisions on the 1991 Act as listed in Article 13.</p> <p>The applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.</p> <p>Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.</p>	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.	NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.
Article 14: Power to alter layout, etc. of streets	<p>(1) The undertaker may, without the consent of the street authority, and for the purposes of carrying out the authorised development, permanently or temporarily alter the layout of, or carry out any works in, a street specified in column (1) of Part 1 or 2 of Schedule 6 (streets subject to alteration of layout) in the manner specified in relation to that street in column (2).</p> <p>(2) Without limitation on the specific powers conferred by paragraph (1), but subject to paragraph (4), the undertaker may, for the purposes of constructing and maintaining the authorised development, permanently or temporarily alter the layout of any street (and carry out works ancillary to such alterations) whether or not within the Order limits and the layout of any street having a junction with such a street and, without limiting the scope of this paragraph, the undertaker may:</p> <ul style="list-style-type: none"> <li>a) increase the width of the carriageway of the street by reducing the width of any kerb, footpath, footway, cycle track, central reservation or verge within the street;</li> <li>b) alter the level or increase the width of any such kerb, footpath, footway, cycle track, central reservation or verge;</li> <li>c) reduce the width of the carriageway of the street;</li> <li>d) execute any works to widen or alter the alignment of pavements;</li> <li>e) make and maintain crossovers, turning lanes and passing places;</li> <li>f) execute any works of surfacing or resurfacing of the highway;</li> <li>g) carry out works for the provision or alteration of parking places, loading bays, footpath, footway, and cycle tracks;</li> <li>h) execute any works necessary to alter or provide facilities for the management and protection of pedestrians; and</li> <li>i) execute any works to provide or improve sight lines required by the highway authority.</li> </ul> <p>(3) The undertaker must restore to the reasonable satisfaction of the street authority any street that has been temporarily altered under this article.</p>	<p>The applicant has the power without the consent of the street authority to permanently or temporarily alter the layout and carry out works to the streets specified in column (1) of Part 1 (streets subject to permanent alteration of layout) or 2 (streets subject to temporary alteration of layout) of Schedule 6. This also includes streets whether or not within the Order limits. This power is far too wide and vague to be acceptable to NH.</p> <p>The A12 Ipswich Road at Junction with B1070 Hadleigh Road and the A120 Ipswich Road referred to in Schedule 6, Part 1 (streets subject to permanent alteration of layout) forms part of the SRN that NH is the highway authority for.</p> <p>Please also see our comments at the end of this table in relation to deemed consent.</p> <p>The applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.</p> <p>Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.</p>	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.	<p>NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.</p> <p>Deemed consent is not agreed by NH and the Protective Provisions will need to disapply all references to deemed consent.</p>

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	<p>(4) The powers conferred by paragraph (2) may not be exercised without the consent of the street authority (such consent not to be unreasonably withheld or delayed).</p> <p>(5) If a street authority which receives an application for consent under paragraph (4) fails to notify the undertaker of its decision before the end of the period of 28 days, <b>it is deemed to have granted consent.</b></p>			
Article 16: Temporary closure of streets and public rights of way	<p>This article provides for the temporary closure, alteration or diversion of streets or public rights of way shown on the access and rights of way plans or within the Order limits. In relation to those streets and public rights of way listed in Schedule 8, National Grid must first consult with the relevant street authority. In relation to streets and public rights of way not listed in the Schedule, the consent of the street authority (which may impose reasonable conditions) must be obtained (such consent not to be unreasonably withheld or delayed)</p>	<p>This article provides that the following streets or PROW's may be temporarily closed, altered or diverted (following consulting with the street authority) or any other street or PROW (with the consent of the street authority)(consent not to be unreasonably withheld or delayed) and temporary diversion provided. A14 and A12 eastbound merge, A12 east bound diverge, A12 Ipswich Road Southbound, A12 Ipswich Road Northbound, A12 Ipswich Road Southbound, A12 Ipswich Road Northbound, A120 northbound merge, A120 northbound diverge, A120 Colchester Road, Coggeshall, A12 Westbound, A12 Eastbound, A127 Southend Arterial Road Eastbound, A127 Southend Arterial Road Westbound, A13 Stanford-le-hope Bypass Westbound, Al 3 Stanford-le-hope Bypass Eastbound, Al 3 Stanford-le-hope Bypass Eastbound diverge to A1089 Dock Approach Road, Al 3 Stanford-le-hope Bypass Eastbound diverge from A1089 Dock Approach Road, Al 3 Stanford-le-hope Bypass Westbound diverge to A1089 Dock Approach Road, Al 3 Stanford-le-hope Bypass westbound diverge from A1089 Dock Approach Road, A1089 Dock Approach Road (Southbound), A1089 Dock Approach Road (Southbound), A1089 Dock Approach Road (Northbound), A1089 Dock Approach Road (Northbound).</p> <p>The applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.</p> <p>Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article. The applicant ought also be required to secure road space booking in advance of exercising the powers in Article 16.</p> <p>Please also see our comments at the end of this table in relation to deemed consent.</p>	<p>The draft Protective Provisions in favour of National Highways proposed in Part 5 of Schedule 16 of the draft DCO <b>(3.1 Draft Development Consent Order [APP-056])</b> prevent National Grid from exercising Article 16 (Protective Works) without the consent of National Highways.</p>	<p>NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.</p> <p>Deemed consent is not agreed by NH and the Protective Provisions will need to disapply all references to deemed consent.</p>
Article 17: Access to works	<p>This article confers upon the undertaker powers for the purposes of the authorised development to provide or improve both permanent and temporary accesses at the locations specified in Schedule 9 (access to works). Similar powers are conferred in relation to any other locations within the Order limits reasonably required for the authorised development so long as the relevant planning authority consents, following consultation with the highway authority (such consent not to be unreasonably withheld or delayed).</p>	<p>17(1)(a) — This article provides the applicant with powers to form and lay out means of access, or improve existing means of access in the locations specified. This includes reference to the A120 Colchester Road at Surrex.</p> <p>17(1)(b) - This article provides the applicant with powers to carry out works to form and lay out such means of access or to improve existing means of access at any location within the order limits with the consent of the relevant street authority. NH network, forms part of that order limits. Deemed consent provisions apply. Please see comments below in this regard.</p> <p>NH must have control over the operations being carried out on its network and accesses from its high speed network. This is critical from a safety perspective and to maintain the integrity of the asset.</p>	<p>National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.</p>	<p>NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.</p> <p>Deemed consent is not agreed by NH and the Protective Provisions will need to disapply all references to deemed consent.</p>

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Article 18: Construction, alteration and maintenance of streets and other structures	Article 18 creates a mechanism for any street constructed or area of street altered or diverted under the Order to be adopted for maintenance at public expense, if it is completed to the reasonable satisfaction of the local highway authority and after a set maintenance period.	<p>Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.</p> <p>Please also see our comments at the end of this table in relation to deemed consent.</p> <p>Article 18 is not acceptable and should exclude the SRN. NH do not agree to deemed adoption and the Applicant would need to comply with the adoption and maintenance provisions included in NH's standard proposed protective provisions.</p> <p>The applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.</p> <p>Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.</p>	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.	NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.
Article 20: Discharge of Water	This article sets out the circumstances in which the undertaker is entitled to discharge water into a sewer, watercourse or drain. Essentially, this can be undertaken with the consent of the owner of the sewer, watercourse or drain (such consent not to be unreasonably withheld or delayed).	<p>This article allows the applicant to use any watercourse, public sewer or drain for the drainage of water in connection with the authorised development.</p> <p>It is unclear whether or not this article applies to NH's drainage system as drafted or whether this applies to public drains only. NH's drainage system is not a public drain and connection to it is not permitted.</p> <p>NH is concerned this provision potentially allows the applicant to make use of highway drainage infrastructure for the benefit of their authorised development. Paragraph 59 of the Draft Circular 01/2022 which contains government guidelines NH are required to comply with, sets out the following:</p> <p>59. To ensure the integrity of the highway drainage systems, no new connections into those systems from third party development and proposed drainage schemes will be accepted. Where there is already an existing informal or formal connection into the highway drainage system from a proposed development site, the right for a connection may be allowed to continue provided that the flow, rate and quality of the discharge into the highway drainage system remains unaltered or results in a betterment. The company may require a drainage management and maintenance agreement to be entered into to secure this requirement in perpetuity.</p> <p>Please also see our comments at the end of this table in relation to deemed consent.</p>	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.	NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.  Deemed consent is not agreed by NH and the Protective Provisions will need to disapply all references to deemed consent.
Article 21: Protective Works	This article sets out the circumstances in which protective works can be carried out to land, buildings, structures, apparatus or equipment, within the Order limits or which may be affected by the authorised development.	<p>This article provides the Applicant with the power to carry out protective works to any land, building, structure, apparatus or equipment lying within the order limits.</p> <p>NH must have control over the operations being carried out on its network and land, structures, apparatus and equipment it has an interest in. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant</p>	The draft Protective Provisions in favour of National Highways proposed in Part 5 of Schedule 16 of the draft DCO <b>(3.1 Draft Development Consent Order [APP-056])</b> prevent National Grid from exercising Article 21 (Protective Works) without the consent of National Highways.	Noted

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Article 22: Authority to survey and investigate the land	This article confers the power to enter land (which under the Act includes land covered with water) within the Order limits or land which may be affected by the authorised development, for the purpose of surveying, monitoring or investigating it, including a power to make trial holes, boreholes, excavations and/or take horizontal cores (e.g. inclined boreholes for the purpose of geological fault modelling), carry out ecological or archaeological investigations or monitoring, and to use and leave apparatus (including attached to buoys) on the land for these purposes. The power of entry is subject to a requirement to give 14 days' notice to owners and occupiers of the land.	<p>should be required to obtain NH's consent in the event any access or works under this article affect the SRN or any land NH has an interest in.</p> <p>NH must ensure the safety of its road users and provide prior to approval to those accessing its network. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.</p> <p>Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.</p> <p>This article allows the applicant to enter any land within the order limits affected by the authorised development or enter on any land upon which entry is required in order to carry out monitor or survey in respect of the authorised development and, carry out surveys or investigations, trial holes, bore holes, ecological or archaeological investigations and place leave or remove apparatus on land in this regard.</p> <p>Whilst it is noted consent is required from the highway authority at sub paragraph 5 for any trial holes, bore holes and trenches for land located within the highway boundary, consent is not required for the wider use of the powers granted within this article such as access to land for surveys etc. Consent is also not required for any land NH own that is outside of the highway boundary and the applicant is only required to serve notice on the landowner prior to exercising this right. This is also a right that extends beyond the order limits.</p> <p>NH must have control over the operations being carried out on its network and land it has an interest in. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event any access or works under this article affect the SRN or any land NH has an interest in.</p> <p>NH must ensure the safety of its road users and provide prior to approval to those accessing its network. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.</p> <p>Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.</p> <p>Such consent should not be subject to deemed Consent. Please see comments below in this regard below.</p>	The draft Protective Provisions in favour of National Highways proposed in Part 5 of Schedule 16 of the draft DCO <b>(3.1 Draft Development Consent Order [APP-056])</b> prevent National Grid from exercising Article 21 (Protective Works) without the consent of National Highways.	Noted
Article 24: Compulsory acquisition of land	This article authorises the compulsory acquisition by National Grid of so much of the Order land listed in the Book of Reference as is required for the construction, operation or maintenance of the authorised development (including UKPN Works) or is incidental to it or necessary to facilitate it. These powers are also afforded to UKPN, albeit limited to the extent that the land is required for the construction, operation and maintenance of the UKPN Works.	<p>NH objects to the inclusion of the plots in the DCO and to Compulsory Powers for the acquisition of land (whether operational or otherwise) being granted in respect of them. Please refer to our comments in paragraph 1.3.2 above.</p> <p>NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably</p>	National Highways' position is noted. This is a matter of ongoing discussion between the parties following the Compulsory Acquisition Hearing 1 held on 11 February 2026.	NH's object to the compulsory acquisition of its land and interests without its consent and this needs to be secured through the Protective Provisions.

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Article 25: Compulsory acquisition of rights	This article allows the undertaker to acquire rights (and impose restrictions) over the Order land, including by creating new rights for the purpose of the authorised development.	<p>in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.</p> <p>Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.</p> <p>NH objects to the inclusion of the plots in the DCO and to Compulsory Powers for the acquisition of rights (whether operational or otherwise) being granted. Please refer to our comments in paragraph 1.3.2 above.</p> <p>NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.</p> <p>Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.</p>	<p>National Highways' position is noted. This is a matter of ongoing discussion between the parties following the Compulsory Acquisition Hearing 1 held on 11 February 2026.</p> <p>The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.</p>	NH's object to the compulsory acquisition of its land and interests without its consent and this needs to be secured through the Protective Provisions.
Article 26: Acquisition of subsoil or airspace only	This article allows National Grid to acquire land lower than ground level or airspace above ground level, rather than having to acquire all of the land.	<p>NH objects to the inclusion of the plots in the DCO and to Compulsory Powers for the acquisition of subsoil or airspace only. Please refer to our comments in paragraph 1.3.2 above.</p> <p>NH must have control over the operations being carried out on its network. NH require control over the subsoil vested in it and airspace over the SRN. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.</p> <p>Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.</p>	<p>National Highways' position is noted. This is a matter of ongoing discussion between the parties following the Compulsory Acquisition Hearing 1 held on 11 February 2026.</p> <p>The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.</p>	NH's object to the compulsory acquisition of its land and interests without its consent and this needs to be secured through the Protective Provisions.
Article 27: Temporary use of land by National Grid	This article which applies only to National Grid, allows the land set out in Schedule 11 to be occupied temporarily by National Grid in connection with the carrying out of the authorised development, as well as any other Order land which may be subject to compulsory acquisition of land or rights but in respect of which National Grid has not yet served a notice of entry or made a general vesting declaration.	<p>This article provides the applicant with the power to take temporary possessions of the land referred to in schedule 11 and any other order land without the consent of NH.</p> <p>NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.</p> <p>Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which</p>	<p>National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.</p>	NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.

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		requires the applicant to obtain NH consent before exercising their right under this article.		
Article 28: Temporary use of land by UKPN	This article is similar to article 27 (Temporary use of land by National Grid) and provides that UKPN may, in connection with the carrying out of the UKPN Works (only) take temporary possession of the Order land specified in Schedule 11.	Please see comments above in respect of Article 27.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.	NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.
Article 29: Temporary use of land for maintaining the authorised development	This article provides for entry upon, and the taking temporary possession of, land within the Order limits (except for houses, gardens and any other building for the time being occupied) reasonably required to maintain the authorised development. At least 14 days' notice must be given (save in emergencies).	<p>This article grants the applicant with the right to take temporary possession of any land for the purposes of maintaining the authorised development within the order limits without the consent of NH, during the maintenance period (period of five years beginning with the date on which that part of the development is replacement or landscape planting where the maintenance period means 5 years beginning with the date on which that part of the replacement or landscape planting is completed). NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.</p> <p>Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.</p>	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.	NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.
Article 30: Use of subsoil under or airspace over streets	This article, which closely follows article 27 of the general model provisions (save for the inclusion of reference to purposes ancillary to the authorised development), provides that National Grid may use streets within the Order limits for the authorised development without being required to acquire any part of the street or any easement or right in the street. Provision is made for the payment of compensation to persons who suffer losses as a result of the exercise of this power.	<p>NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.</p> <p>Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.</p>	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.	NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.
Article 37(6)(b) Application of Part 1 of the 1965 Act	<p>Article 37(6)(b) seeks to amend Part 1 of the 1965 Act by inserting a new paragraph 30 which reads:</p> <p style="text-align: center;">"PART 4 INTERPRETATION</p> <p>30. In this Schedule, references to entering on and taking possession of land do not include doing so under article 21 (protective works), 27 (temporary use of land by National Grid), 28 (temporary use of land by UKPN) or 29 (temporary use of land for maintaining the authorised development) of the National Grid (Norwich to Tilbury) Order 20[xx]."</p>	Please can the Applicant explain the purpose of this inclusion which does not seem to follow the structure of the articles. In any event NH object to the substance of the wording which suggests that entering on and taking possession of land do not apply to the articles listed which does not make sense.	<p>Article 38(6) ensures that references to entering on and taking temporary possession of land under Schedule 2A (as introduced by the Housing and Planning Act 2016) do not include entering on and taking temporary possession under the Order.</p> <p>This reflects the fact that Schedule 2A has two processes for the serving and determination of counter-notices depending on whether or not the acquiring authority is in possession of the land. The interpretation clause makes it clear that the undertaker will not be deemed to be in possession of the land</p>	Noted

Article/ Sch	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response	National Highways Response 12 March 2026
Article 38: Extinguishment and suspension of private rights	This Article provides for the extinguishment or suspension of private rights over land subject to compulsory acquisition and the extinguishment of private rights over land subject to the compulsory acquisition of rights (in so far as the continuance of the existing right would be inconsistent with the right acquired or a breach of a restriction as to the user of land arising by virtue of contract) from the date of the acquisition of the land or rights, or the date of entry, whichever is earliest.	<p>NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.</p> <p>Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.</p>	where it is exercising its power under Articles 21, 27, 28 or 29.	NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.
Article 39: Power to override easements and other rights	The provision allows for an approach whereby only those rights which obstruct the authorised development will be overridden, avoiding the extinguishment of rights, the continued use of which can be accommodated by the authorised development.	<p>It seems this article permits the Applicant to interfere with any right or interest NH may have within the order limits. This raises a concern however it is not clear whether there will be a temporary interference or permanent extinguishment of NH's interests.</p> <p>Please can the Applicant confirm how this is going to apply relating to NH's interests.</p> <p>NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.</p> <p>Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.</p>	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.	NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.
Article 40 - Statutory authority to override easements and other rights	This article provides that, by virtue of section 158 of the Act, in carrying out or using the development authorised by the Order and doing anything else authorised by the Order, National Grid may interfere with any easement, liberty, privilege, right or advantage annexed to land and affecting other land, including any natural rights of support, or breach any restriction as to user of land arising by virtue of contract.	<p>It seems this article permits the Applicant to interfere with any statutory easement or other right NH may have in relation to the Order (within or outside the order limits). This raises a concern however it is not clear whether there will be a temporary interference or permanent extinguishment of NH's interests.</p> <p>Please can the Applicant confirm how this is going to apply relating to NH's interests within or outside the order limits.</p> <p>NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.</p> <p>Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which</p>	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.	NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.

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		requires the applicant to obtain NH consent before exercising their right under this article.		
Article 41: Extinguishment of private rights and restrictive covenants relating to apparatus belonging to National Grid or UKPN removed from land subject to temporary possession	This Article provides that all private rights over land that is temporarily occupied by National Grid or UKPN are suspended and unenforceable for the duration of the occupation insofar as inconsistent with the exercise of the Order powers. Under this article, rights in relation to apparatus which is removed from the land are extinguished when National Grid or UKPN no longer remains in lawful possession of the land.	Those comments made in relation to Article 27 and Article 28 apply equally in relation to this Article.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.	NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.
Article 44: Statutory undertakers	Subject to the protective provisions in Schedule 16 of the Order, it authorises the undertaker (1) to compulsorily acquire land belonging to statutory undertakers described in the Book of Reference (document reference 4.3), (2) to extinguish rights of statutory undertakers, as well as the removal or repositioning of apparatus belonging to statutory undertakers, (3) acquire compulsorily existing rights, create and acquire new rights and impose restrictive covenants over land belonging to statutory undertakers described in the Book of Reference, (4) construct the authorised development in a way that crosses statutory undertakers' apparatus and (5) construct and maintain any necessary track or roadway over, including the power to install any necessary service media.	NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.  Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.	NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.
Article 45: Apparatus and rights of statutory undertakers in stopped-up streets	Article 45 protects the powers and rights of any statutory undertaker whose apparatus is located under, in, on, along or across any street which is stopped up under Article 15 (Permanent stopping up of streets and public rights of way). It also provides that, upon the undertaker's reasonable request, the statutory undertaker must remove or alter the position of existing apparatus or provide other apparatus in substitution.	NH are currently investigating whether it has any interest in land within Schedule 7. In any event, NH would object to the principle of inclusion of this article and, if necessary, will be seeking to protect its interest by the inclusion of this article in paragraph 7(2) of NH's proposed protective provisions. This would address NH objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.	NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.
Article 47 (Application of Landlord and Tenant)	This article governs the undertaker leasing any part of the authorised development for the purposes of its construction, operation or maintenance to any other person. It allows the terms of the lease to override any statutory provisions relating to landlord and tenant law.	NH do not have sufficient information to understand whether this article is likely to affect NH. In any event, NH would object to the principle of inclusion of this article and, if necessary, will be seeking to protect its interest by the inclusion of this article in paragraph 7(2) of NH's proposed protective provisions. This would address NH objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	This article relates to National Grid having the ability to lease any part of the authorised development for the purposes of its construction, operation or maintenance to any other person.	It is NH's position that this article could be dealt with in the Protective Provisions in favour of National Highways if suitable Protective Provisions can be agreed which ensure that the rights within the article cannot be exercised without the consent of NH.
Article 49: Traffic regulation	This article allows National Grid to regulate traffic on the roads to the extent specified in Schedule 13 or to any other extent that is expedient or necessary, with the consent of the traffic authority, for the purposes of the authorised development or for purposes ancillary to the construction or maintenance of the authorised development	NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.	NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.

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Article 50: Felling or lopping	This article provides the Applicant with the power to fell or lop any tree or shrub near any part of the authorised development.	<p>NH are making checks internally to ascertain whether NH have any environment mitigation commitments that may be affected by the authorised development to ascertain whether this article may put NH in breach of its own statutory obligations.</p> <p>If works undertaken to trees affect any NH BNG commitments a replacement tree or trees would need to be provided to satisfy that existing commitment at a location to be agreed.</p> <p>NH object to the principle of inclusion of this article and, if necessary, will be seeking to protect its interest by the inclusion of this article in paragraph 7(2) of NH's proposed protective provisions. This would address NH objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.</p>	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.	NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.
Article 55: Procedure requiring certain approvals etc.	The article clarifies the procedure which applies in respect of these additional consents.	Article 55(3) refers to paragraph 3, 4 and 5 of Schedule 4 (discharge of Requirements). Paragraph 3(2) of Schedule 4 should be amended to provide that NH are not liable for a refund in the event that refund falls due to matters outside NH's control.	Paragraph 3(2) of Schedule 4 relates to applications that are rejected, failed to be determined, withheld or refused by the relevant authority, all of which are within the discharging authority's control.	Paragraph 3(1) refers to the a fee being paid to the "relevant authority" which is defined as "the body responsible for giving and consent, agreement or approval under this schedule ..." whereas 3(2)(b) requires the relevant planning authority who fails to determined the application within 28 days to refund the fee. Please confirm that this is a deliberate carve out so NH would not be obliged to refund fees.
Article 58: Application, disapplication and modification of legislative provisions	This article makes provisions applying, modifying and excluding the statutory provisions set out in Schedule 17.	This article refers to Schedule 17 which seeks to exclude the provisions of the Highways Act 1980 in relation to the sections set out in Schedule 17. No explanation is provided in the Explanatory Memorandum seeking to justify the exclusion of the noted sections in the Highways Act 1980. In any event, NH object to the disapplication of the Highways Act 1980 in this regard. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset.	This is to prevent conflict or duplication with legislative provisions whereby the activities managed by the legislative provisions will be dealt with under the DCO articles or National Highways' Protective Provisions.	<p>NH do not accept the exclusions sought.</p> <p>The exclusions comprise:-</p> <p>Highways Act 1980: 6. Sections 141 (restriction on planting of trees etc. in or near carriageway), 169 (control of scaffolding on highways) and 171 (control of deposit of building materials and making of excavations in streets) of the 1980 Act will not apply to the extent such operations or works are required for the purposes of, or in connection with, the construction and maintenance of the authorised development.</p> <p>Any exclusion does not allow NH to safely manage its asset and consent needs to be obtained from NH in undertaking any of the activities that are governed by the provisions which NG are seeking to exclude.</p>
Article 60: Certification of Documents		NH reserve the ability to request the addition of any required plans/documents etc to the plans and documents identified in Schedule 19.	The Applicant notes this comment.	Noted.
Deemed Consent Note		<p>There are a number of articles which contain deemed consent provisions which would apply where NH does not provide its consent or approval to any provisions under the order within 28 days of it being requested where no response is received.</p> <p>28 days is not considered a reasonable period of time to consider every application that may come through under this DCO, some may be more involved than others. 8 weeks would be considered reasonable.</p> <p>In any event, NH is concerned with the deemed consent given the safety</p>	<p>The Applicant's position is that a 28 day decision making timeframe is proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Clean Power Target of 2030, is not unnecessarily delayed by circumstances outside the control of the Applicant.</p> <p>National Grid has reviewed the wording proposed by National Highways in paragraph 7(7) of the Protective Provisions and will revert as part of ongoing</p>	Noted. The ExA should note however that NH's position is that deemed consent should not apply wherever works or activities are proposed on the SRN. NH do need to give actual consent. Were the ExA to disagree with NH's position, then a period of 28 days for providing consent is not sufficient.

Article/ Sch	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response	National Highways Response 12 March 2026
		<p>implications of works being carried out to or under the strategic road network that may have bypassed its approval processes. This is a fundamental issue of public safety that should not be compromised to enable a private developer to achieve a quicker build programme. NH has statutory obligations to behave reasonably and support sustainable development and so it should not be forced to work under the pressure of deemed consent.</p> <p>The potential implications from a safety perspective of something going wrong far outweigh the Applicant's case for such a provision.</p> <p>Inclusion of paragraph 7(7) of NH proposed protective provisions at Appendix 1 would address NH concerns which would seek to disapply the above referenced articles in the context of any consent relating to the strategic road network. The affect of this is to prevent the Promoter from exercising powers over the SRN or land in which NH has an interest without deemed consent applying. The justification is to ensure open dialogue between the parties so that NH has control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. As a public body, NH is under a duty to act reasonably and this is expressly provided in paragraph 7(4) of NH's protective provisions.</p> <p>Please note that the position applies to all articles which include deemed consent provisions.</p>	discussions in relation to the draft provisions between the parties.	
<b>Requirements (Schedule 3)</b>				
4. Construction Management Plans	<p>(1) No stage of the authorised development may commence until, for that stage, the following plans as relevant to that stage have been submitted to and approved by the relevant planning authority (in consultation with Natural England in the case of the landscape and ecological management plan) or other discharging authority as may be appropriate to the relevant plan concerned including National Highways where any amendments affect the Strategic Road Network or land NH have an interest in. The relevant plans are:</p> <ul style="list-style-type: none"> <li>(a) code of construction practice (which must be substantially in accordance with the outline code of construction practice);</li> <li>(b) construction traffic management plan (which must be substantially in accordance with the outline construction traffic management plan);</li> <li>(c) landscape and ecological management plan (which must be substantially in accordance with the outline landscape and ecological management plan);</li> <li>(d) public rights of way management plan (which must be substantially in accordance with the outline public rights of way management plan);</li> </ul> <p>(2) All construction works for each stage of the authorised development must be carried out in accordance with the approved plans referred to in paragraph (1), unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned.</p> <p>(3) For the avoidance of doubt, all pre-commencement operations must be carried out in accordance with the outline code of construction practice, the outline</p>	<p>In addition to the approval of the Local Planning Authority, NH approval should be sought where any amendments to documents, details or schemes affect the SRN or land NH has an interest in. For any variations to the approved documents and plans, NH must ensure that changes do not adversely impact the SRN. This is in the interest of maintaining the safe and efficient operation of the SRN. Inclusion of drafting in red would address NH's concern.</p>	<p>The definition of "discharging authority" set out in Requirement 1 of Schedule 3 of the draft DCO <b>(3.1 Draft Development Consent Order [APP-056])</b> is drafted widely enough to include National Highways and as such, the Applicant does not consider it necessary to amend the drafting.</p>	<p>Noted. However, requirements do need to be sufficiently precise and clear and therefore NH do request these revisions to put matters beyond doubt.</p>

Article/ Sch	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response	National Highways Response 12 March 2026
	construction traffic management plan, the outline landscape and ecological management plan and the outline public rights of way management plan unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned.			
7. Construction hours	<p>(1) Subject to sub-paragraphs (2) to (5) 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 (the core working hours), unless otherwise approved by the relevant planning authority (in consultation with NH where any work affects the Strategic Road Network or land NH have an interest in).</p> <p>(2) No percussive piling works may take place outside of the hours of 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays, unless otherwise approved by the relevant planning authority (in consultation with NH where any work affects the Strategic Road Network or land NH have an interest in).</p> <p>(3) Subject to sub-paragraphs (4) and (5), no HGV deliveries may be made to site outside of the hours of 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays, unless otherwise approved by the relevant highway authority.</p> <p>(4) The following operations may take place outside the core working hours and, as the case may be, the hours referred to in sub-paragraph (3):</p> <ul style="list-style-type: none"> <li>(a) trenchless crossing operations including beneath highways, railway lines, woodlands, nature reserves, Sites of Special Scientific Interest or watercourses;</li> <li>(b) the installation and removal of conductors, pilot wires and associated protective netting (included but not limited to) across highways, railway lines or watercourses;</li> <li>(c) the jointing of underground cables;</li> <li>(d) the continuation of any work activity commenced during the core working hours to a point where they can securely and or safely be paused;</li> <li>(e) any highway works requested by the highway authority to be undertaken on a Saturday or Sunday or outside the core working hours;</li> <li>(f) the testing or commissioning of any electrical plant installed as part of the authorised development including undertaking of any identified corrective activities;</li> <li>(g) the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities;</li> <li>(h) activity necessary in the instance of an emergency where there is a risk to persons or property;</li> <li>(i) security monitoring;</li> <li>(j) non-intrusive surveys;</li> <li>(k) intrusive surveys;</li> <li>(l) oil processing of transformers or reactors in substation sites;</li> <li>(m) delivery to the transmission works of abnormal indivisible loads and any highway works</li> </ul>	NH would wish to be consulted on any variation to hours given the potential for impact on the SRN.	National Highways' position and proposed wording is noted. Any consequential amendments to the draft DCO <b>(3.1 Draft Development Consent Order [APP-056])</b> will be reflected in the next revision of the Order.	Noted

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	<p>requested by the highway authority to be undertaken outside the core working hours; and</p> <p>(n) mechanical and electrical installation works within buildings once erected and enclosed.</p> <p>(5) The core working hours exclude start up and close down activities up to 1 hour either side of the core working hours.</p> <p>(6) The severe weather conditions referred to in sub-paragraph (4)(4)(g) means any weather which prevents work from taking place during the core working hours referred to in sub-paragraph (1) and, as the case may be, the hours referred to in sub-paragraph (3) by reason of physical incapacity (whether for reasons of visibility, ground conditions, power availability, site access or otherwise) or being contrary to safe working practices.</p>			
8. Retention and removal of trees, woodland and hedgerows	<p>(1) Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may commence until, for that stage, a plan showing the trees, groups of trees, woodlands and hedgerows to be retained and/or removed during that stage has been submitted to and approved by the relevant planning authority (in consultation with NH where any trees, groups of trees, woodlands and hedgerows affects the Strategic Road Network or land NH have an interest in).</p> <p>(2) The plan submitted under sub-paragraph (1) must include details of the location, species and condition of the trees, groups of trees, woodlands and hedgerows to be removed and/or retained during that stage of the authorised development.</p> <p>(3) The plan submitted under sub-paragraph (1) must be in accordance with the outline landscape and ecological management plan (or the final landscape and ecological management plan if approved pursuant to requirement 4) and the trees and hedgerows to be removed or managed plans.</p> <p>(4) All trees, groups of trees, woodlands and hedgerows shown on the relevant plan for that stage of the authorised development must be retained and/or removed in accordance with the relevant plan as approved under sub-paragraph (1) for that stage of the authorised development, unless otherwise agreed by the relevant planning authority (in consultation with NH where any trees, groups of trees, woodlands and hedgerows affects the Strategic Road Network or land NH have an interest in).</p>	As per NH's comments on Article 50, if works undertaken to trees, woodlands or hedgerows affect any NH BNG commitments a replacement trees or hedgerows would need to be provided to satisfy that existing commitment at a location to be agreed. NH would therefore want to be consulted on the proposals	The definition of "detailed design information" within the Protective Provisions in favour of National Highways includes "site clearance details" which are subject to National Highways' approval under the process prescribed at paragraph 7 of the Protective Provisions.	The Applicant's response is agreed, subject to the Protective Provisions making it clear that site clearance includes reference to trees, woodland and hedgerows.
9. Reinstatement planting plan	<p>(1) Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may be brought into operational use until, for that stage, a reinstatement planting plan for trees, groups of trees, woodlands and hedgerows to be reinstated during that stage has been submitted to and approved by the relevant planning authority (in consultation with NH where the reinstatement planting affects the Strategic Road Network or land NH have an interest in).</p> <p>(2) The reinstatement planting plan submitted under subparagraph (1) must include a schedule of trees, hedgerows or other plants or seedlings to be planted, noting numbers, species, sizes and planting density of any proposed planting or seedlings.</p> <p>(3) The reinstatement planting plan submitted under subparagraph (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>	As per NH's comments on Article 50, if works undertaken to trees, woodlands or hedgerows affect any NH BNG commitments a replacement trees or hedgerows would need to be provided to satisfy that existing commitment at a location to be agreed. NH would therefore want to be consulted on the reinstatement planting proposals.	As noted in the Applicant's response in respect of Article 50 above, this is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.	The Applicant's response is agreed, subject to the Protective Provisions making it clear that site clearance includes reference to reinstatement planting plan within the landscaping.

Article/ Sch	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response	National Highways Response 12 March 2026
	<p>(4) Unless otherwise agreed with the relevant planning authority, all reinstatement planting works approved under sub-paragraph (1) must be implemented at the earliest opportunity and no later than by the first available planting season after that part of the authorised development to which the reinstatement planting works apply is first brought into operational use.</p> <p>(5) All reinstatement planting works approved under subparagraph (1) must be carried out in accordance with the approved reinstatement planting plan for that stage of the authorised development, unless otherwise approved by the relevant planning authority (in consultation with NH where any reinstatement planting works affect the Strategic Road Network or land NH have an interest in).</p> <p>(6) All reinstatement planting works approved under subparagraph (1) must be implemented, monitored and maintained in accordance with the 'Aftercare' section of the landscape and ecological management plan approved pursuant to requirement 4.</p> <p>(7) Any trees or hedgerows planted as part of an approved reinstatement planting plan that, within a period of five years after planting (or such other period as is specified in the landscape and ecological management plan approved pursuant to requirement 4), are removed, die or become in the opinion of the relevant planning authority seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species and size as that originally planted, unless otherwise approved by the relevant planning authority (in consultation with NH where any reinstatement planting works affect the Strategic Road Network or land NH have an interest in).</p>			
10. Reinstatement schemes	<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 <del>24 months</del> 6 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 (in consultation with NH where any work affects the Strategic Road Network or land NH have an interest in).</p> <p>(2) The requirement to reinstate the land to a condition suitable for its former use does not apply to land above or within 10 metres of underground cables installed as part of the authorised development.</p> <p>(3) The requirement to reinstate the land to a condition suitable for its former use is subject to the provisions of article 27 (temporary use of land by National Grid), article 28 (temporary use of land by UKPN) and article 29 (temporary use of land for maintaining the authorised development).</p>	<p>NH seek the reinstatement of the A120 verge within 6 months following the use of the access ceasing. This is in the interest of maintaining the safe and efficient operation of the SRN. 21 months is an unreasonably long period. Inclusion of the drafting in red would address NH's concern.</p>	<p>The 21 month period links back to the time period in Article 27 (Temporary use of land by National Grid) and Article 28 (Temporary use of land by UKPN) of the draft DCO <b>(3.1 Draft Development Consent Order [APP-056])</b>, in which the undertaker is not permitted to remain in possession of the land without the consent of the owners after the end of a period of 21 months.</p>	<p>A reduced period does need to be provided for in the case of the A120 to ensure a safe and efficient operation of the SRN. Moreover we note that article 29 provides for an open ended temporary possession over a period of 5 years.</p>
<b>Discharge of Requirements – Schedule 4</b>				
Paragraph 1	<p>(1) Paragraph 1 states "(1) Where an application has been made to a relevant authority for any consent, agreement or approval required by a Requirement (including consent, agreement or approval in respect of part of a Requirement), the relevant authority must give notice to the undertaker of its decision on the application within a period of 28 days beginning with:</p> <p>(a) where no further information is requested under paragraph (2), the day immediately following that on which the application is received by the authority;</p>	<p>NH cannot agree to the inclusion of 1(2) which is effectively deemed consent.</p> <p>5 days is not long enough, and in any event the provisions of 2(4) are considered disproportionate and NH cannot agree to the same. 28 days would be a more reasonable period.</p>	<p>National Highways' position in relation to deemed consent is noted.</p> <p>This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.</p>	<p>This provision will need to be kept under review as discussions on Protective Provisions are advanced. In the meantime, NH stands by its previous comments.</p>

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	<p>(b) where further information is requested under paragraph (2), the day immediately following that on which further information has been supplied by the undertaker; or</p> <p>(c) such longer period as may be agreed in writing by the undertaker and the relevant authority."</p> <p>(2) Subject to sub-paragraph (3), in the event that the relevant authority does not determine an application within the period set out in sub-paragraph (1), the relevant authority is taken to have granted all parts of the application (without any condition or qualification) at the end of that period.</p>			
Paragraph 2	<p>Under Further information stipulates that where an application has been made under paragraph 1 the relevant authority may request such reasonable further information from the undertaker as it considers is necessary to enable it to consider the application.</p> <p>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. If the relevant authority does not give the notification mentioned it is deemed to have sufficient information to consider the application and is not thereafter entitled to request further information without the prior agreement of the undertaker.</p>	<p>5 days is not long enough, and in any event the provisions of 2(4) are considered disproportionate and NH cannot agree to the same. 28 days for requesting further information would be a more reasonable period.</p>	<p>Given the Project's status as a project of critical national importance, the Applicant considers 5 days for the relevant discharging authority to request additional information to be proportionate and appropriate. It aligns with the timeframe in the draft National Grid (Sea Link) Order.</p> <p>Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.</p> <p>Paragraph 1(4) of Schedule 4 to the draft DCO <b>(3.1 Draft Development Consent Order [APP-056])</b> allows the relevant authority to seek the Applicant's consent to request further information after the five day period if necessary.</p> <p>Likewise, Paragraph 1(1)(c) of Schedule 4 to the draft DCO allows the relevant authority to agree in writing a longer decision period with the Applicant. The Applicant considers that the existing drafting provides appropriate flexibility, but has been, and continues to be, committed to collaborative working with the relevant Authorities and will continue to engage on these matters throughout Examination and post consent should development consent be granted.</p>	<p>The Applicant's response is noted. NH's position remains that 5 days is not acceptable.</p>