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Date: 10 April 2026  
Sent Via Email:  
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Dear Ms Hunt,

**Application by National Grid Electricity Transmission (NGET) for a Development Consent Order (DCO) for the proposed Norwich to Tilbury Project (Application Reference: EN020027).**

**Essex County Council (ECC) Norwich to Tilbury Deadline 3 submission.**

- i. The purpose of this submission is to respond to the Examining Inspectors' First Written Questions, provide commentary on the Applicant's draft itinerary for the Accompanied Site Visit, notification of a wish to attend hearings on the week commencing 27 April 2026, notification of a wish to attend an accompanied site inspection and to provide comments on any further information or submissions made at Deadline 2.
- 1. Responses to ExQ1**
    - 1.1. ECC responses to the ExQ1 is provided in Appendix 1.
    - 1.2. ECC welcomes the questions directed at the Applicant in ExQ1, which reflect a number of the principle and technical issues that ECC has raised through its submissions to the Examination. ECC will consider the Applicant's response to these accordingly.
    - 1.3. ECC would reiterate in responding to these questions it's in principle strategic objection to the scheme as set out within part 4.2 of the Local Impact Report (REP1-161). ECC from the outset of its engagement on this project, has raised an in-principle objection throughout all stages of consultation. ECC maintains a strong held view that its preferred strategic option for meeting the need for additional

transmission capacity is that of securing an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines (“OHLs”) and pylons along its entire length. ECC remains strongly of the view that a more sensitively designed scheme which minimises the predominant use of traditional overhead line technology, could deliver the best outcome for Essex in the interests of safeguarding the amenities of local communities and the environment.

**2. Comments on the Applicant’s draft itinerary for the ASI**

2.1. ECC notes the following suggestions submitted at Deadline 1 by ECC were not included within the Applicant’s draft itinerary. A response from the Applicant why these suggested locations were not included is requested.

<b>Suggested location</b>	<b>Justification why a visit is beneficial</b>	<b>Is access to private land required?</b>	<b>Document Reference</b>
Wick Lane between TB-B012 and TB-B011	To note the narrow lane characteristics and level of traffic using it. The proposals are to include traffic signals to allow movements between the two haul roads. ECC has concerns that the road is too narrow to allow vehicles using Wick Lane to pass each other when the queues at both sets of signals are released which will result in blockages. Wick Lane is well used as a wider network of rural lanes to bypass congestion on the A12 and A120 between A12 and A120 and there is therefore real potential for there to be significant impact on the operation of the highway	No. It is adopted highway.	As shown in Document 2.5 Access, Rights of Way & Public Rights of Navigation Plans Section C, Sheet 12 of 18 (APP-035)

Ardleigh Road between JC-B071 and JC-B070	To view the nature of the existing rural road network which is open fields on both sides, and noting that this is proposed to be widened to 6m with speed limit reduction between the haul road and EACN access. ECC has concerns that widening the carriageway will encourage higher speeds which are not self-enforcing and potentially anti-social behaviour associated with speeding.	No. It is adopted highway.	As shown in Document 2.5 Access Rights of Way & Public Rights of Navigation Plans Section C, Sheet 14 and 15 of 18 (APP-035)
Bentley Road – between the junction of A120 and JC-B072	To view the existing Bentley Road which will be used extensively for Norwich to Tilbury to access the EACN. Noting the two potential private haul road options available for the construction period – one to the north at JC-8072 (which will be permanent for access), and one to the south where Norwich to Tilbury will use this as temporary access if available via the two windfarms (North Falls and Five Estuaries). The two windfarms will be crossing Bentley Road from the east through to the EACN on this southern route.	No. It is adopted highway	As shown in Document 2.5 Access Rights of Way & Public Rights of Navigation Plans Section C, Sheet 16 of 18 (APP-035)

### **3. Notification of a wish to attend hearings on the week commencing 27 April 2026**

- 3.1. ECC Officers will be in attendance at hearings both virtually and in person on Tuesday 28th April, Wednesday 29th April and Friday 1 May 2026. The appropriate forms on the Examination webpage have been completed to register attendance.

ECC highlights that attendance may be subject to change following the publication of the detailed agendas but ECC will inform the ExA accordingly. Where ECC has registered the right to speak, this is to enable response or to provide clarification to any questions which may be directed at ECC.

**4. Notification of a wish to attend an accompanied site inspection (if required)**

4.1. ECC Officers would wish to attend an accompanied site inspection within Essex and will confirm once the detail itinerary is published.

**5. Comments on any further information or submissions received by deadline 2**

**8.8.2 Applicant's Comments on Local Impact Reports (Final Issue A) (REP2-130)**

5.1. ECC welcomes the submission of the Applicant’s comments on the Local Impact Reports, however, it is disappointed with the form and detail of the responses provided on the considerable matters raised within the ECC Local Impact Report. Many of the responses appear quite cursory and have not specifically addressed the issues raised (other than referencing existing documents) and as a consequence there continues to be matters which remain inadequately addressed by the Applicant despite being repeatedly raised by ECC.

*Traffic and Transport*

5.2. ECC’s comments as Local Highway Authority in respect of the Applicant’s Comments on Local Impact Report (REP2-030) are below in table form:

LIR Ref	Comments from National Grid	Response from ECC
3.18.54 and page 158	<p>Developers’ Forum: pg 158 re Article 18: “[T]he Applicant has committed to joining and engaging in the Developer’s Forum proposed by Essex County Council to help facilitate coordination.”</p> <p>Paragraph 3.18.54 (pg 124) National Grid have stated states they “will consider the request for a Developer’s Forum and engage</p>	<p>ECC welcomes National Grid’s commitment to joining and engaging in the Developers’ Forum in their response to ECC’s Local Impact Report (referenced on p158 within their response on Article 18).</p> <p>See Appendix 1, wording provided by ECC for inclusion into the CTMP in the response to the ExA’s Inspector’s Questions (ref. TT 1.36) where ECC has included details of</p>

	with the Local Authorities accordingly.”	the Forum, based on those in our Local Impact Report (REP1-161, paragraphs 4.4.29-4.4.32) (paragraph reference 3.18.54).
Table 3.23		ECC notes the Applicant’s response concerning the Framework Highways Agreement. A FHA ECC’s and other authorities strong preference and comments on the applicant’s draft will be provided
Table 3.23	ECC notes there is no response from the Applicant to the following point raised in ECC’s LIR at paragraph 5.2.2 “The Permit Scheme and Traffic Regulation Order (“TRO”) definitions need to be aligned with each other in terms of timescales and process. For clarity, the Permit Scheme includes the temporary TRO process within it.”	ECC continue to re-iterate that the wording in the DCO separates out the temporary TRO and Permit Scheme processes whereas in reality they are part of one standard process followed by ECC. ECC as Local Highway Authority does not accept the timescales set out for a temporary TRO for the following reasons: <ul style="list-style-type: none"> <li>• ECC has a standard process and timescales that are applied to all applicants which works well with the amount of applications that ECC receive and the resource available</li> <li>• ECC has not agreed any of the TROs yet. ECC is awaiting further information and so there is uncertainty over the acceptability of the TROs – this is likely to result in more time spent in discussing them post DCO as part of the Permit Scheme process.</li> </ul>

Table 3.23	Decision for highway works to proceed within 28 days rather than 35 days	<p>ECC does not accept the response that 28 days is sufficient. The 35 day decision period stated for highway works is on the basis that 35 days has been used for Bramford to Twinstead DCO and has worked well. ECC will endeavour to respond as soon as possible, however the 35 days timescales allow more flexibility particularly considering the number of NSIPs that will be operating or applying for operations within Essex.</p> <p>It is worth noting from ECC's experience on Bramford to Twinstead that the contractor has pushed forward with alternative design proposals at times (for example, not including a right turn facility) which has meant a lot of back and forth and extensions of time for a decision. This suggests and further supports that 35 days is a more realistic period for a decision.</p>
Article 12	<p><u>Article 12 Application of Permit Schemes</u></p> <p>The Applicant acknowledges ECC's position regarding the timings of TTRO's, however:</p> <p>(a) Notwithstanding applications from other developers, it remains unclear why a consent to use a temporarily closed street or public right of way as a temporary working site would require longer than</p>	<p>ECC does not accept the timescales set out for a temporary TRO for the following reasons:</p> <ul style="list-style-type: none"> <li>• As already identified ECC has a standard process involving timescales that are applied to all applicants. This takes account of the number of applications that ECC receive and the resource available to process them. ECC believe it is not reasonable to define a timescale in isolation from the reality that ECC have to</li> </ul>

	<p>28 days' consideration by the Council; and</p> <p>(b) The 28-day timing referred to in connection with paragraph (5)(b) relates only to TTROs that are not already envisaged as being required in Schedule 8 of the draft DCO and so the Applicant does not anticipate there being a large volume of such applications.</p> <p>The Applicant does not consider it necessary to adjust the timescales in the draft Development Consent Order</p>	<p>deal with multiple applications at the same time. This will include other DCOs and developments.</p> <ul style="list-style-type: none"> <li>• ECC has not agreed any of the TROs yet. ECC is awaiting further information and so there is uncertainty over the acceptability of the TROs – this is likely to result in more time spent in discussing them post DCO as part of the Permit Scheme process.</li> <li>• It is unclear why the TTRO and Permit Scheme are separated out in the DCO as the TTRO is part of the Permit Scheme.</li> <li>• In relation to part (b) the requirement for longer timescales is required for TTROs that are not included in Schedule 8 as there will have been no information provided or agreement at all with ECC in advance.</li> </ul>
<p><u>Article 16</u></p>	<p><u>Article 16 Temporary Closure of Streets and Public Rights of Way</u></p> <p>The Applicant re-iterated the points above in relation to Article 12 on timescales for the TTROs</p> <p>The Applicant acknowledges that closures to streets and public rights of way can be disruptive to regular users. However, ECC will</p>	<p>ECC refers to the comments made above in relation to Article 12 in relation timescales for TTRO.</p> <p>Under ECC's standard approaches to TRO consultations there is a requirement for the start and finish of the specific TRO to be stated in the application form. This is to enable the Local Highway Authority to understand the impacts.</p>

	<p>appreciate that given the different reasons for such closures, it is not practical or helpful to specify the length of time for a temporary closure. Some temporary closures will be very short, whilst others may need to be slightly longer. 7.3 Outline Construction Traffic Management Plan (App-309), which is controlled by Requirement 4 of the Schedule 3 to the draft Development Consent Order, sets out further details on these temporary closures.</p> <p>The wording at Article 16 (6) does not prevent the Applicant from providing alternative routes to a higher standard where it is reasonable and appropriate to do so, but simply does not require all alternative routes to be of a higher standard. Article 16(6) is a provision that will apply generally, and which accounts for there being some exceptions, such as in the example provided by ECC.</p>	<p>It is understood that the DCO sets out the proposed TROs but does not include the likely duration. As the DCO is the vehicle for the consultation period of the TRO for ECC (and other bodies/individuals) to respond then ECC would expect the same level of information to assess impact as the standard TRO process approach. Without this information it is unclear as to how much of an impact the various TROs will have. expect to have the same level of information to assess the impact.</p> <p>ECC notes the wording allowing for bridleways to be wider (4m) than existing to allow for construction works. However, ECC would request that the wording is updated to allow for this flexibility so it is clear.</p>
Article 18	<p>Article 18(1) and (2) each include an “unless otherwise agreed with the street authority” caveat to the maintenance provision for streets, constructed, altered or diverted under this Order. Furthermore, where the Applicant uses land temporarily (including the construction of temporary accesses) it is required by Article 27 (Temporary use of land by National Grid) to reinstate the land</p>	<p>The stated caveat references that maintenance will be the responsibility of the highway authority after a 12 month period. However, this has not been agreed and maintenance may not always be undertaken by ECC. If this is the case, the Articles do not specifically set out what happens in that eventuality i.e there is no acceptance of the alternative that the Applicant maintain the land within the adopted highway</p>

	<p>to the reasonable satisfaction of the owners of the land.</p> <p>The Applicant does not consider it appropriate to have a commitment in its draft Development Consent Order that binds the Project with Five Estuaries, North Falls and Tarchon interconnector on construction timetables, maintenance and mitigation strategies. These are separate schemes at different stages. However, the Applicant has committed to joining and engaging in the Developer’s Forum proposed by ECC to help facilitate coordination. The 7.3 Outline Construction Management Plan (App-309) further notes that the Main Works Contractor will liaise with the relevant highways authorities. National Highways and other major infrastructure developers to ensure a coordinated approach to construction traffic management.</p>	<p>ECC agrees that it is not appropriate to bind all the projects to the Norwich to Tilbury DCO. However, ECC would like to see evidence that discussions have been happening with the other DCOs Applicants. ECC has previously highlighted this point as something that ECC is concerned with and would like to have reassurance that some form of collaborative agreement is in place between the windfarms and Norwich to Tilbury.</p>
<p>Table 3.23, p159</p>	<p>Given the scale of the Project, the programme pressures and constraint costs that become payable for each day that the Project’s energisation is delayed (all of which are explained in more detail elsewhere in this response), the Applicant cannot accept a 12 week period in Article 49 (traffic regulation).</p>	<p>ECC has a standard permanent TRO process that is applied to all applicants which takes account of the number of applications that ECC receives and the resource available. It is not reasonable to define a timescale in isolation from the fact that ECC has to deal with multiple applications at the same time from other DCOs or developments</p>

		<ul style="list-style-type: none"> <li>• A 12 week period allows for more reasonable planning of works in a proactive manner particularly considering that National Grid is not going to be the only contractor operating on the network and therefore flexibility and careful planning is required.</li> <li>• ECC has not agreed any of the TROs in the DCO yet as are awaiting further information and so there is therefore uncertainty over the acceptability of the TROs – this is likely to mean more time spent in discussing them post DCO.</li> </ul>
4.4.40	<p>The proposal to use Variable Messaging Sign (VMS) as part of this communication strategy is something the Applicant would welcome further discussion on with the relevant Local Highway Authorities.</p>	<p>ECC requires:</p> <ul style="list-style-type: none"> <li>• A commitment in the CTMP (APP-309) to variable messaging systems (VMS). See Appendix 1, the draft wording provided by ECC for the CTMP (APP-309) in response to the ExA’s Questions (ref. TT 1.36).</li> <li>• A commitment in the Community Engagement and Public Information document (APP-305) for the website and any other media communication: <ul style="list-style-type: none"> <li>○ to include clear information to the public on what AILs are, why they are needed and how they</li> </ul> </li> </ul>

		<p>impact the local//strategic road network</p> <ul style="list-style-type: none"> <li>○ to include information on how people’s journeys will be impacted without people needing to consult multiple sources of information</li> </ul>
4.4.41	<p>The Contractor is currently undertaking detailed structural assessments along the selected AIL routes supported by their haulage specialist. This is dependent on the availability and adequacy of existing asset records. The Contractor is aiming to complete this by the end of the Examination process, assuming all relevant information is provided from the asset owners in a timely manner. However, this will only prove the structures are acceptable at the time of the assessment and identify any mitigations required. A further review will be required closer to the planned and agreed movement schedule to ensure the AILs are still suitable.</p>	<p>ECC requires that the latest position regarding the detailed structural assessments is set out for the AIL routes across all counties in the form of a plan (or similar) to show the restrictions and mitigation options (setting out whether these are agreed with stakeholders or still to be agreed). ECC wants to understand potential impacts on the network prior to the end of Examination as this should be part of the assessment of the application. ECC continues to reiterate that wider discussions should be undertaken with all relevant stakeholders to ensure there are viable AIL routes and that decisions made on mitigation in one authority do not impact on other locations in other authorities.</p>
4.4.53	<p><i>Existing Roadside Facilities</i></p> <p>With regards to the suggestion that surveys be undertaken prior to the start of works, the Applicant will continue to discuss this matter with ECC.</p>	<p>ECC has included a requirement in the CTMP (APP-309) for the Contractor to commit to surveys and mitigation (if required) prior to works. Appropriate draft wording is set out in Appendix 1 in ECC’s the Response to the ExA’s Written Questions (question no. TT 1.36)</p>

<p>4.5.65</p>	<p><i>Junction modelling of Site 38 (Ardleigh Crown Interchange) and Site 47 (A120 Coggeshall Road/Great Tey Road).</i></p> <p>Mitigation to reduce any residual impacts needs to be investigated. The Applicant will continue to engage with National Highways and ECC to discuss and agree the junction capacity mitigation measures at these sites. This will be documented in 5.9.20 Draft Statement of Common Ground – National Highways.</p>	<p>ECC welcome engagement on this point. ECC expects the mitigation to be agreed prior to the end of Examination and details included in the finalised CTMP (APP-309) at Table 5.9.</p>
<p>4.5.66</p>	<p><i>Junction modelling of Site 48 (A120 Braintree Bypass/A131 Great Notley Bypass, Site 73 (A127 Southend Arterial Road/A176 Noak Hill Road, site 69 (A1060 Roxwell Road/Lordship Road), Site 71 (A414 Greenbury Way/Highwood Road), Site 74 (A176 Noak Hill Road/Wash Road and Site 82 (A129 London Road/Mountnessing Road)</i></p> <p>“As noted in paragraph 5.9.10 of 7.3 Outline Construction Traffic Management Plan (APP-309) where there are instances of the junction performing under current baseline conditions, these will be discussed on case-by-case basis with the Local Highway Authority. The intention of these meetings will be to discuss if any viable mitigation could be provided at the junctions.</p>	<p>ECC welcomes engagement on this point. No discussions have been held on mitigation since the submission of the DCO. ECC expects the mitigation to be agreed prior to the end of Examination and details included in the finalised CTMP (APP-309) at Table 5.9.</p>

	<p>The Applicant will continue discuss the principles of monitoring with ECC.</p>	
<p>4.5.68</p>	<p><i>Junction Mitigation in relation to above</i></p> <p>The avoidance of construction traffic during peak hours has not been applied as a general mitigation measure. Several junctions are used by multiple construction access routes, and it would not be practical to coordinate all construction vehicle movements outside peak periods. It should be noted that the number of construction vehicles associated with the main and satellite compound staff could be reduced by the measures detailed within the 7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan (APP-311) to reduce the number of single occupancy private car trips or flexible working practices.</p> <p>However, the Applicant is undertaking further analysis to understand whether there are any opportunities to phase work activities differently to reduce peak hour traffic impacts. The Applicant has and will continue to liaise with ECC on this matter.</p>	<p>It is unclear why multiple construction access routes cannot be coordinated so that construction vehicles (HGVs) are restricted during peak hours. Further explanation is sought on this point through the liaison suggested.</p> <p>It is noted that the CWTP (APP-311) is used to reduce the number of construction vehicles associated with the compound staff. ECC highlights that providing a mini-bus will be an important tool in reducing worker vehicles and requires this to be included as a measure in the CWTP.</p> <p>ECC welcomes engagement on this mitigation point as no discussions have been held on this particular issue since the submission of the DCO. ECC welcomes the further analysis being undertaken to consider opportunities to phase work activities and looks forward to hearing the outcome. ECC expects the mitigation to be agreed prior to the end of Examination and details included in the finalised CTMP (APP-309) at Table 5.9.</p>

4.5.70	<p><i>Road Link Mitigation</i></p> <p>The 7.11 Transport Assessment (APP-333) provides the assessment of the junctions along PARs 50 and 51 at Chelmsford and PAR 59 at Billericay. On those junctions that are forecast to operate at or over capacity on the future baseline scenarios during the worst-case peak period, there may continue to be some level of impact outside of that period. However, typically there is only a marginal impact upon capacity due to the addition of the Project construction traffic flows over the existing and future baseline scenarios. The Applicant considers that it is reasonable to conclude that the magnitude of impact outside of the worst-case peak period would be lower.</p>	<p>As identified in the LIR at paragraph 4.5.70, PARs 50, 51 and 59 are described as having a similar level of traffic over a longer period (4 months) compared to the one-week period. The level of impact for these links are defined as “significant” in Table A16.4.2 of the Appendix 16.4 Environmental Statement (APP-275). This is associated with the delays at congested junctions which impact the link. It is unclear how the level of impact is reduced outside of the construction peak period of one week when the traffic flows outside of the construction peak period for 4 months are similar.</p>
4.5.71	<p><i>Significant Impact on Links – defined in Table 1 in ECC’s LIR</i></p> <p>The Applicant will continue to engage with ECC on this matter to ensure appropriate mitigation is provided where deemed necessary on those road links where delay has been identified.</p>	<p>ECC welcomes engagement on this mitigation point. No discussions have been held on this particular issue since the submission of the DCO. ECC expects the mitigation to be agreed prior to the end of Examination and details included in a finalised CTMP (APP-309) in Table 5.9 or a separate table setting out mitigation on links associated with driver delay.</p>
4.5.72	<p><i>Link PAR 37 – major magnitude of impact due to baseline HGVs</i></p> <p>The assessment of driver delay and bus passenger delay in 6.16.A4</p>	<p>Noted. ECC agrees that modelling results show Site 46 operates within capacity based on inputs. ECC awaits the Technical Note summarising the</p>

	<p>Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] for PAR 37 reports a magnitude of impact as major largely because the baseline number of HGVs using this route is very low (around 3%) so any increase in HGV movements during construction will show as a large proportional change in the assessment. The Applicant confirms that Site 46 A12 Eight Ash Green Interchange was initially identified as a sensitive junction on a sifting process based on existing congestion or potential capacity issues due to the increase in traffic. However, the junction modelling results presented in 7.11 Transport Assessment [APP-333] show that the junction will operate within capacity across all scenarios and time periods. The Applicant will continue to engage with ECC on modelling and mitigation.</p>	<p>queue and traffic flows to verify all models.</p>
<p>4.5.73</p>	<p><i>Link PAR 49 – Mitigation in the form of temporary signage due to Site 63</i></p> <p>The assessment reports a magnitude of impact as major largely because the baseline number of HGVs using this route is very large (around 3%) so any increase in HGV movements during construction will show as a large proportional change in the assessment.</p>	<p>Driver delay will occur at Site 63 which leads towards the conclusion of the magnitude of impact on the PAR 49. The modelling results show there is an impact as a result of the scheme as the RFC changes – in particular in the AM Peak where the RFC is above 1.0 (illustrating congestion). The difference in queue length with and without the construction traffic for the Norwich to Tilbury scheme is 21 vehicles.</p> <p>ECC welcome engagement on this mitigation point as no discussions</p>

	<p>The results of the modelling of Site 63 in 7.11 Transport Assessment (APP-333) shows that the junction currently operates already at or over capacity in the future baseline scenarios and there is no predicted change in junction performance as a result of the Project construction flows, with changes of RFC from 1.02 to 1.10 in the AM peak hour and 0.91 to 0.96 in the PM peak hour.</p> <p>The Applicant will continue to engage with Essex County Council on modelling and mitigation.</p>	<p>have been held on this particular issue since the submission of the DCO. ECC would expect the mitigation to be agreed prior to the end of Examination and details included in a finalised CTMP (APP-309) in Table 5.9 or a separate table setting out mitigation on links associated with driver delay.</p>
4.5.74	<p><i>Link PARs 51 and 59</i></p> <p>The Applicant will continue to engage with Essex County Council on modelling and mitigation.</p> <p>The assessment of driver delay and bus passenger delay in 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] for PAR 51 and PAR 59 reports a magnitude of impact as major largely because the baseline number of HGVs using this route is very low (around 2% and 1% respectively) so any increase in HGV movements during construction will show as a large proportional change in the assessment.</p> <p>In PAR 51, Site 69 is the only junction that operates at or over capacity. The results of the modelling of Site 69 in 7.11 Transport Assessment [APP-333] shows that the junction currently</p>	<p>ECC welcomes engagement on this mitigation point as no discussions have been held on this particular issue since the submission of the DCO. ECC would expect the mitigation to be agreed prior to the end of Examination and details included in a finalised CTMP (APP-309) in Table 5.9 or a separate table setting out mitigation on links associated with driver delay.</p> <p>Driver delay will occur at Site 69 which leads towards the conclusion of the magnitude of impact on the PAR 51. The modelling results show there is an impact as a result of the scheme as the RFC changes – in particular in the PM Peak where the theoretical capacity of the junction is exceeded (above 1.00).</p> <p>Driver delay will occur at Site 81 which leads towards the conclusion of the magnitude of impact on the PAR 59. The modelling results show there is an impact as a result of the</p>

	<p>operates already at or over capacity during the PM peak hour and there is no predicted change in junction performance as a result of the Project construction flows, with changes of RFC from 0.90 to 0.93 in the AM peak hour and 1.03 to 1.05 in the PM peak hour.</p> <p>In PAR 59, the junction modelling for Site 81 indicated that there is not a predicted change in junction performance as a result of the Project and the junction would operate marginally over practical capacity in the PM peak hour, with an increase of the Degree of Saturation (Dos) from 91% to 93.1%. A proposal of signal time optimisation would reduce the effects.</p> <p>The junction modelling results for Site 82 indicate a delay in the road users turning onto Mountnessing Road, due to the decrease in available space to turn from the A129 with the addition of construction traffic. The junction will operate over capacity in the AM peak hour with an increase of RFC from 0.83 to 0.91 and at capacity in the PM peak hour with changes of RFC from 0.87 to 0.88. The Applicant is proposing to monitor the performance of this junction during construction. The Applicant has and will continue to engage with Essex County Council on any additional mitigation, where appropriate.</p>	<p>scheme as the DoS changes – in particular in the PM Peak.</p> <p>Driver delay will occur at Site 82 which leads towards the conclusion of the magnitude of impact on the PAR 51. The modelling results show there is an impact as a result of the scheme as the RFC changes – in particular in the PM Peak where the theoretical capacity of the junction is exceeded (above 1.00).</p> <p>It is noted that the Applicant is proposing to monitor the performance of the junctions. Further discussion is required to agree the mitigation. ECC would expect the mitigation to be agreed prior to the end of Examination and details included in a finalised CTMP (APP-309) in Table 5.9 or a separate table setting out mitigation on links associated with driver delay.</p>
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<p>4.5.75</p>	<p><i>Junction Mitigation</i></p> <p>7.11 Transport Assessment [APP-333] provides detail of the assessment undertaken to provide detail on the potential impacts on the local highway network. The avoidance of construction traffic during peak hours has not been applied as a general mitigation measure. Several junctions are used by multiple construction access routes, and it would not be practical to coordinate all construction vehicle movements outside peak periods. 7.3 Outline Construction Traffic Management Plan [APP-309] provides detail of where peak hour restrictions are proposed. For junctions located within Essex, the primary mitigation measures are to monitor the operation of the junction and signal and cycle time optimisation. The Applicant will continue to liaise with Essex County Council on the suitability of these measures for mitigating the temporary construction impacts.</p> <p>As noted in 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311], the Travel Plan Coordinator will capture the actual shift start and end times of construction workers on site, at quarterly intervals throughout the construction programme. This will inform the monitoring report. Through this monitoring report, the Applicant will be able to demonstrate adherence to the</p>	<p>It is unclear why multiple construction access routes cannot be coordinated so that construction vehicles (HGVs) are restricted during peak hours. Further explanation is sought on this point.</p> <p>The Outline Construction Traffic Management Plan should be updated when the mitigation has been agreed prior to the end of Examination.</p> <p>ECC has set out other options for mitigation including upgrading sustainable infrastructure which the Applicant should consider.</p> <p>It is noted that the Applicant is proposing to monitor the performance of the junction. ECC would want to agree what interventions will be implemented if the monitoring shows there is a material impact at this junction.</p> <p>Monitoring the start and finish times of workers will be important. ECC agree that including this monitoring requirement in the CWTP (APP 311) is a good way to capture whether the travel behaviour of workers is in line with the assumptions in the ES Chapter. ECC would also require that some suggested corrective actions are included if the workers are travelling to/from site during peak hours. The CTMP (APP-309) should also include mention of the monitoring - see wording provided by ECC into CTMP in the EXQ1 (ref. TT 1.36).</p>
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	<p>controls put in place for workers arriving and departing from site, including the assessment assumptions.</p>	
<p>4.5.77</p>	<p><i>Abnormal Maintenance</i></p> <p>The Main Works Contractor(s) will create a record of Primary Access Routes (PARs) as part of the pre construction conditions surveys of the existing highway network. The pre-construction condition surveys are proposed to be undertaken on all Abnormal Indivisible Load and HGV routes, as detailed in Section 5.2 of the 7.3 Outline Construction Traffic Management Plan [APP-309], with the proposed methodology to be agreed with the Local Highway Authority. The results of these pre-condition surveys will be shared with the Local Highway Authority prior to works commencing, including pre-commencement works relating to the highway. Section 6.2 of the 7.3 Outline Construction Traffic Management Plan [APP-309] details how post-construction condition surveys should be undertaken after construction, and the results of these and any remedial works will be discussed and agreed with the landowner and, where applicable, the relevant highway authorities, prior to handover.</p> <p>The point raised by Essex County Council regarding the monitoring road conditions through quarterly observations during the construction period is noted. The</p>	<p>ECC notes the Applicant has a section on pre- and post condition surveys in the CTMP which essentially proposes to agree the condition monitoring methodology during construction. It does not set out the context of our abnormal maintenance point or show that it differs from the standard pre- and post-condition surveys that are common in construction (such as taking photographs at the start and end of works and making good any specific items). ECC included additional text in the CTMP to cover the high level points that it wants to agree prior to the end of Examination so that all parties know what is expected in advance and have given some context for the Contractors to understand our concerns. ECC's experience of working on other DCOs shows that Contractors tend to focus on the CTMP rather than referring back to the planning material of the DCO and so it is important to have some high level principles and context set to define the approach in this working document.</p>

	Applicant will work with Essex and the Main Works Contractor(s) to agree the condition monitoring approach during construction.	
4.5.79	<p><i>Maintenance</i></p> <p>The Applicant has noted ECC's request for a commitment to a mechanism for reclaiming costs in respect of emergency callouts relating to either damage that has occurred in the highway as a result of the construction (within the vicinity of the site accesses) or Traffic Management issues associated with the scheme. The Applicant has said they will enter into discussions with ECC on this subject.</p>	ECC welcomes engagement on this issue and look forward to discussing further. The assumption is that this mechanism would be included in a s106 and would like to discuss and agree this within the Examination period.
4.5.80	<p><i>A1060 Roxwell Road – average speed cameras</i></p> <p>The Applicant will continue to work with Essex County Council to understand the commitment that Essex County Council is seeking in relation to the A1060 Roxwell Road.</p>	ECC and the Applicant have had a recent conversation on the various road safety schemes suggested. The A1060 Roxwell Road is fully funded and so ECC does not seek a commitment from the Applicant to implement the scheme.
4.5.81	<p><i>Road Safety – Table of Potential Works</i></p> <p>The Applicant will consider the new information provided in the LIR (road safety improvement) recommended by Essex County Council (ECC) in relation to the project.) The Applicant will continue to work with ECC to understand the scale of each scheme, the relationship to the Project including timescales, the priorities and contributions requested.</p>	ECC and the Applicant will continue to discuss. Where schemes are to be taken forward ECC suggest they are implemented by the Applicant rather than collecting contributions through s106.

<p>4.5.85</p>	<p>The assessment for the pedestrian, cyclist and horse rider fear and intimidation presented in Table A16.4.6 of the 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] has been based on the sensitivity established for the pedestrian, cyclist and horse-rider Amenity and a weighting system defined in the IEMA Guidelines Environmental Assessment of Traffic and Movement (2023)<sup>84</sup>. This therefore included a qualitative review and assessment of the adequacy of the provision of footways on the Primary Access Routes (PARs) in the definition of the sensitivity of the road links. The Applicant considers that the existing conditions have been appropriately reflected in the assessment methodology and conclusions.</p> <p>For example, for PAR 37 A1124 Halstead Road mitigation has been proposed within the 7.3 Outline Construction Traffic Management Plan [APP-309] to address the impact on Amenity and Fear and Intimidation. This included a driver information pack which will identify locations where pedestrians may be walking either on a verge or carriageway, ensuring adjacent vegetation is maintained to keep verge clear and allow the full width of footway to be utilised, and placing signs to warn drivers of upcoming pedestrians in road ahead crossing the carriageway.</p>	<p>The point that ECC was making in the LIR was that there are sections of the PARs that have narrow existing effective footway widths due to dirt/debris overspill that were not referenced. Tables A16.4.5 and A16.4.6 in ES Appendix 16.4 (APP-275) did not include commentary on the point around the effective footway width which is an important consideration in relation to Amenity and Fear &amp; Intimidation. Narrow footways mean that pedestrians are walking in closer proximity to the carriageway of the PAR where HGVs are passing to access the site. Therefore, ECC were not convinced that this had been taken into account in the considerations of Amenity and Fear &amp; Intimidation – bearing in mind that there is a level of qualitative assessment that is required.</p> <p>ECC notes the CTMP (APP-309) Table 5.7 has included mitigation in the form of driver information pack, ensuring adjacent vegetation is maintained and placing signs to warn drivers of pedestrians in the carriageway for PAR 37. This deals with the issue detected relating to the use of verge by WCH at locations where there are PRoW access points and no footways present. This does not deal with the locations on the PAR where there is a reduced effective footway width adjacent to the carriageway which would require mitigation in the form of “siding out” to remove debris/dirt/mud overpill.</p>
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	<p>For PAR 41 there are verges of various widths located alongside the carriageway through rural sections and with limited trip attractors apart from Public Rights of Way (PRoWs); where pedestrians are likely to cross the carriageway to reach the opposite PRoW, it is unlikely that pedestrians would walk along the PAR itself which has a speed limit of 50 mph. Within the urban areas footways are provided with small sections of low level vegetation encroachment from adjacent verge. The residual construction significance of effects would therefore be slight adverse, temporary, and not significant.</p> <p>For PAR 42 and 43 there are a few localised short sections of footway that are narrowed by existing low level vegetation / encroachment from an adjacent verge that could be utilised. The increase in construction traffic on these PARs is notably low (17 HGVs an hour – 9 in each direction). The residual construction significance of effects is therefore considered to be slight adverse, temporary, and not significant.</p> <p>The Applicant will continue to engage with Essex County Council on this matter regarding the need for further mitigation in the form of vegetation clearance/'siding out' of existing footways and maintenance of verges.</p>	<p>ECC welcomes engagement on this specific matter with the Applicant to agree the specific PARs that require this mitigation. ECC would require that the agreed mitigation is included in the CTMP (APP-309) as an update prior to the end of Examination.</p>
4.5.86	The Applicant notes this comment and has and will continue to	Response above in 4.5.85 related to this point.

	engage with Essex County Council on this matter regarding the need for further mitigation in the form of vegetation clearance/'siding out' of existing footways and maintenance of verges.	
4.5.87/4.5.88	The Applicant notes this comment and has and will continue to engage with Essex County Council on this matter regarding the need for further mitigation in the form of vegetation clearance/'siding out' of existing footways and maintenance of verges.	ECC requests that the Applicant checks the PRoW network to ensure that all locations that enter rural lanes where there is potential for pedestrians in the road or waiting on verges as there is a lack of footway are identified. These should be included in an update to the CTMP (APP-309) prior to the end of the Examination setting out which PARs are to have mitigation in the form of vegetation clearances and warning signage. ECC identified PAR 39, 41 and 51 but there may be others – hence the Applicant should review and confirm back to ECC with a comprehensive list which is then agreed and incorporated in the CTMP.
4.5.89	The location noted on Spa Road in Witham is identified in 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans [APP-317] (Section E, Sheets 5 and 6, Constraint E7). This indicates that it is proposed for street furniture to be removed from the location temporarily in order to accommodate the design vehicle movements. Mitigation in the form of an appropriate traffic management arrangement (layout) will be agreed with the Local Highway Authority and put in place	ECC notes the Applicant has agreed to mitigation and request a plan showing the proposals for agreement with ECC prior to the end of Examination. The CTMP (APP-309) should be updated prior to the end of Examination to reflect the commitment to the proposed mitigation along with a description of works.

	to replace the street furniture temporarily removed.	
4.5.91	<p>There are proposed road closures with diversions in the vicinity of the Essex County Council Depot in Ardleigh, with diversions of the A137 Harwich Road, Home Farm Lane and Little Bromley Road as detailed in 2.4 Traffic Regulation Order Plans - Section C [APP-027], 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section C [APP-035] and in Schedules 6, 8 and 13 in 3.1 Draft Development Consent Order [APP-056]. 7.3 Outline Construction Management Plan [APP 309] provides information on traffic management. Given that access to the depot would be required at all times, the Contractor has a duty to provide 'access only' arrangements for Essex County Council access and egress, and the specifics of this would be confirmed through engagement between the Contractor and Depot staff and captured within the in agreement with the Local Highway Authority following the change process outlined within 7.3 Outline Construction Traffic Management Plan [APP-309]. The works would also all be managed through the permit scheme by the Contractor.</p>	<p>ECC requires a commitment to be included in the CTMP (APP-309) to ensure that the Contractor provides 24/7 access to the depot and does not hinder response times. It is not accepted that this is dealt with through the change process outlined in CTMP (APP-309). It is an important point as will impact on road safety if ECC are unable to respond to emergency incidents on the local highway network in a timely manner.</p> <p>ECC have provided wording to add to the CTMP (APP-309) - see wording provided in the Inspector's Questions (ref. TT 1.36).</p>
4.5.92	<p>Ardleigh Road is scheduled for short-term temporary road closures to enable highway works such as construction of bellmouths, and for overhead line works such as stringing activities. These are outlined in 7.3 Outline Construction Traffic Management Plan [APP-309], along with</p>	<p>Response above in 4.5.91 related to this point.</p>

	<p>information on traffic management. The Applicant acknowledges that access to the depot will be required 24/7, and the Main Works Contractor(s) will have a duty to provide 'access only' arrangements for Essex County Council and emergency services access and egress to the site. Details of the access arrangements are to be confirmed through engagement between Essex County Council and the Main Works Contractor(s).</p>	
4.5.98	<p>The Contractor is required to undertake suitable intrusive surveys in order to design adequate and compliant widening. Essex County Council will be a key stakeholder in reviewing and approving the design prior to construction.</p>	<p>ECC require the CTMP (APP-309) to be updated to include confirmation that the Contractor will undertake suitable intrusive surveys to ensure there is sufficient depth of construction on existing carriageways. This is to ensure adequate tie in of widening works and that the existing carriageway can accommodate the volume of construction traffic.</p> <p>ECC have provided wording to add to the CTMP (APP-309) - see wording provided in the Inspector's Questions (ref. TT 1.36).</p>
4.5.99	<p>The Applicant concurs with Essex County Council's stated position that – where achievable – proposed speed limits should broadly be self-enforcing. The Applicant is also aware of concerns expressed by Essex County Council relating to specific locations where it may not necessarily be practicable to achieve a self-enforcing speed limit, and will continue to engage with Essex County Council and other stakeholders as appropriate with a</p>	<p>ECC welcomes continued engagement on the speed limit changes and await further information to be able to progress discussions on the TROs proposed.</p>

	<p>view to ameliorating such concerns. The Applicant has sought to include proposals for Traffic Regulation Orders (TROs), including where these relate to reductions in posted speed limits, in support of the safe and effective provision of site access, crossover, and mitigation proposals interfacing with the Public Highway. This approach is outlined in 7.3 Outline Construction Traffic Management Plan [APP-309]. Designs relating to these locations have been subject to the Road Safety Audit (RSA) process – with oversight from the relevant Local Highway Authorities for each area of the scheme – set out in 7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA Strategy [APP-334]. This process included consideration of both posted speed limits and, where available, speed survey information. Survey locations are shown in 7.11 Transport Assessment – Appendix I – Figures [APP-342] – noting that Project traffic count surveys also included the recording of speed information, as discussed in 6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271]. On this basis, proposed TROs are considered to broadly account for driver behaviour in a suitable and realistic manner.</p>	
4.5.101	<p>Wick Lane</p> <p>With regards to the safety concerns raised, it is proposed to install a set of 4-way traffic lights to manage construction traffic</p>	<p>To date the safe use of Wick Lane by construction traffic has not been demonstrated. The position of the Highway Authority is that Wick Lane should not therefore be used by construction traffic. Due to the</p>

	<p>joining the public highway. This will be located; i. ii. On the haul road at the junction with Wick Lane, On Wick Lane at the junction with the Haul road, iii. On Lodge Lane at the junction with Wick Lane, and iv. On Wick Lane at Ardleigh reservoir bridge. The decision was taken to use a traffic management solution instead of widening the lane, due to the poor forward visibility and the additional vegetation removal and land take outside of the Essex CC ownership. Our assessment of the impact of the traffic lights on movements indicates that with a 96-second cycle time, predicted queues at either end are expected to remain below 5 PCUs (Passenger Car Units), indicating sufficient capacity for the proposed construction and existing flows. This is below the limits stated within the Traffic Signs Manual Chapter 8. National Grid has undertaken a Stage 1 Road Safety Audit (RSA) on the proposals. The Local Highway Authority (Essex CC) has reviewed the Stage 1 RSA and has responded that it is content that the proposals are safe. The Applicant notes Essex's concerns at this location. The Applicant's appointed Main Works Contractor is undertaking a more detailed assessment at this location. They will consider additional options as suggested by Essex County Council and will continue to engage with them on this matter.</p>	<p>constraints in both width and alignment of Wick Lane this is not something that in the opinion of the Highway Authority can be deferred for further consider post DCO.</p> <p>ECC's response in the RSA was <i>"The proposal should be considered further. Traffic flow modelling should be conducted to ensure there is sufficient storage length. Overall, we are concerned that the proposal will not provide sufficient mitigation due to the nature of Wick Lane."</i></p> <p>ECC has not received any detail on the operation of the traffic lights such as traffic flow information and model outputs. ECC also do not know the likely usage of Wick Lane by vehicles connecting between the two bellmouths, or the timescales for use.</p>
4.5.102	The widening scheme relating to Ardleigh Road referenced by Essex	ECC continues to raise concerns around anti-social behaviour due to

	<p>County Council is, as stated, intended to facilitate both construction and operational access to the proposed East Anglia Connection Node (EACN) Substation. The section of Ardleigh Road which would be impacted by the proposals is shown in 7.3 Outline Construction Traffic Management Plan - Appendix C – Indicative Highway Mitigation Plans – Section C [APP-315], Sheet 15. The operational requirement for retaining the full proposed width of the carriageway is based on the need to maintain a route suitable for the Transformer Delivery Abnormal Indivisible Load (AIL) (as set out under 7.3 Outline Construction Traffic Management Plan - Appendix A - AIL Strategy [APP-310]) in order to facilitate potential future delivery if a ‘secured event’ were to occur during the operational life of the proposed substation under the National Electricity Transmission System Security and Quality of Supply Standard, as noted in paragraph 2.7.12 of 7.11 Transport Assessment [APP-333]. In developing the proposed access strategy, the Applicant considered a number of access options for the proposed EACN Substation. A summary of options is included within Table 3.19 of 6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]. The Applicant is aware of concerns expressed by Essex County Council with respect to the permanent operational arrangement of this widened section of Ardleigh Road.</p>	<p>speeding as a result of the permanent widening on Ardleigh Road and the self enforcing nature of the permanent speed limit proposed. ECC note the Applicant is reviewing the speed limit proposals.</p> <p>As the Main Works Contractor is on board ECC requests that other alternative design options are considered by them as they will have more detailed information on the construction of the scheme. ECC would request that a high level design is agreed prior to the end of Examination as it is important that ECC is not left with a legacy issue. At present it is not clear that there is a viable solution for suitable measures to address operational concerns due to the nature of the road.</p>
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	<p>The Applicant will continue to engage with Essex County Council, and other relevant stakeholders, with a view to proposing suitable measures to address the noted operational concerns in this area. The option of increasing the permanent speed limit reduction along Ardleigh Road from 30 mph to 40 mph is being explored as a modification to the Development Consent Order application. Should residual risks be identified following this increase, the Applicant shall, through future engagement with the Local Highway Authority at detailed design, consider implementing permanent highway features to safely promote self-enforcement of the reduced speed limit, whilst not impeding use of the access route by the necessary design vehicles.</p>	
4.5.103	<p>The two existing Public Rights of Way (PRoWs) that cross the permanent private access road between Bentley Road and Ardleigh Road cross the access road at an angle. The intention is therefore for them to be subject to very minor permanent diversions to create new, safer perpendicular crossing facilities. The sections of the PRoWs to be permanently stopped up, together with the proposed alignments of their associated diversions, are shown on the 2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-033 to APP-040 inclusive]. As detailed design progresses, the precise alignment, length and specification of the</p>	<p>ECC have provided wording to add to the CTMP (APP-309) to ensure that the details of the changes to the PRoW are agreed with the LHA - see wording provided in the EXQ1 (ref. TT 1.36).</p>

	<p>permanent diversions and crossing will be developed in consultation with the Local Highway Authority PRow Officer, and any resulting proposals would be in accordance with appropriate and relevant design standards.</p>	
<p>4.5.104</p>	<p>The Applicant would welcome further engagement with the Local Highway Authority to discuss the detail, form and durations of the draft Traffic Regulation Orders (TROs) in Schedule 13.</p> <p>The Applicant has conducted traffic and speed surveys in the locations of proposed Site Access Points and Crossover Points. This data has been considered within the design of these locations and the proposed implementation of any speed limit restrictions.</p> <p>During construction of the Site Access Points, Crossover Points and highway mitigation works, there may be works where it is not safe or practicable for the public highway to remain fully available for use. During these limited periods, the Applicant would seek to maintain access through the deployment of traffic management. Should this not be feasible or operationally reasonable, due to factors such as limited existing carriageway width, the Applicant would seek to implement a limited duration closure.</p> <p>In addition, short-term road closures are required for netting activities associated with the</p>	<p>Discussions have been undertaken recently where the Applicant has agreed to summarise the TROs including a statement of reasons for each one listed in the DCO schedule. ECC also set out the information that ECC has requested to date to be able to review the TROs in more detail.</p> <p>As the consultation period for the TROs is through the DCO Examination it is important that ECC is able to agree them. Therefore, the information is required quickly so that ECC has time to review, discuss any concerns, and request any amendments so that ECC can ultimately agree the TROs in principle.</p>

	<p>overhead line stringing. These closures are of very short duration (hours rather than days) and can occur at night, further limiting potential disruption.</p> <p>Due to the limited duration and occasional nature of these potential closures, the Applicant does not consider it appropriate to conduct traffic flow or speed surveys along diversion routes, in line with typical temporary road closure procedures. Given their limited carriageway width, generally the closures will be required on more minor local roads, and therefore it is anticipated that there will be a limited traffic flow impact resultant from these closures. Additionally, the use of diversion routes would not change the existing road speed conditions to trigger the requirement to obtain speed data along these routes.</p> <p>All works will be coordinated with the Local Highway Authority by the Main Works Contractor through the use of the permit scheme.</p> <p>The Applicant has and will continue to work with Essex County Council regarding the requirement for further survey work in relation to on-street parking.</p>	
4.5.106	<p>ii. Traffic Regulation Order (TRO) durations – The works programme is yet to be finalised, along with the requirements of commencement dates, so durations of all TROs are unable to</p>	<p>Under standard approaches to TROs. Essex’s application form includes a requirement for the start and finish of the specific TRO to be stated. This is to enable the LHA to understand the impacts. Without this</p>

	<p>be confirmed at this time. The 7.3 Outline Construction Traffic Management Plan [APP-309] sets out details and reasoning for consideration by the contractor relating to traffic management and TROs, including references to Local Highway Authority permit scheme, and lengths (distance and duration) of traffic management measures. The Applicant will continue to engage with the Local Highway Authority on the reasons for the TROs.</p> <p>iii. The key on the 2.4 Traffic Regulation Order Plans (Sections A to H) [APP-025 to APP-032 inclusive] presents in their Legend whether the TROs are either temporary or permanent, Additionally, Part 4 of Schedule 13 of the 3.1 Draft Development Consent Order [APP-056] lists all permanent TROs for the Project, whereas Parts 1 to 3 lists all temporary TROs.</p> <p>iv. TRO enforcement – Traffic enforcement in Essex is primarily carried out by the Essex Police for speed enforcement and enhancing road safety, and by the Essex County Council for traffic-related services. Maintaining the TROs – The 7.3 Outline Construction Traffic Management Plan [APP 309] Table 6.1 provides indicative timescales and responsibility for monitoring of/checking signage, vehicles and road network. Traffic Management is set out within Section 5.8 of 7.3 Outline Construction Traffic Management</p>	<p>information it is unclear as to how much of an impact it will have. It is understood that the DCO is the consultation period for the TROs proposed and as such ECC (along with all those consulted on these proposals) expect to have the same level of information to assess the impact.</p> <p>The CTMP (APP-309) includes reasoning and estimated timescales for some activities but does not relate this back to the specific TROs included in Schedule 13 of the DCO or reference the exact plans within the Access and Rights of Navigation Plans (Doc Ref 2.5). It is not clear that all the estimated timescales in the CTMP are included for all TROs. It makes it difficult to review when the information is dotted around in different documents and plans. Hence, our request above to the applicant to provide a summary related to each draft TRO.</p> <p>ECC will continue to discuss the TROs with the Applicant and await further information. Note response to EXQ1 (ref. TT 1.38).</p>
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	<p>Plan [APP 309]. The Applicant's Main Works Contractor is to develop traffic management proposals including signage in accordance with the 7.3 Outline Construction Traffic Management Plan [APP 309] which are to be agreed with the Local Highway Authorities.</p> <p>v. The diversion routes have been identified following typical road closure procedures, where diversion routes are a similar or better standard than that to be closed in terms of alignment, carriageway width, height and weight restrictions.</p> <p>vi. A mechanism for scope to change diversion routes – Section 2.4 Consents, Licences and Permits, and Section 6.5 Community Liaison of the 7.3 Outline Construction Traffic Management Plan [APP 309] Section 2.4 Consents, Licences and Permits, and Section 6.5 Community Liaison provides references use and adherence of Local Highway Authority Permit Schemes, in order to best coordinate the street works required for the Project. Details for Contingency Routes where circumstances may require a change in diversion route/s are included within the 7.3 Outline Construction Traffic Management Plan [APP 309].</p> <p>vii. The 7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA Strategy [APP-334] sets out</p>	
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	<p>the reasoning behind decisions for the preliminary designs, being based on 85th percentile speed survey data, site-specific constraints and highway safety considerations together with other measures in combination to determine the suitable design speeds as listed with Schedule 13 of the 3.1 Draft Development Consent Order [APP-056] for TRO speed restrictions.</p> <p>The Applicant will continue to discuss the TROs with Essex County Council.</p>	
4.5.108	<p>7.3 Outline Construction Traffic Management Plan [APP-309] sets out that where diversions are necessary (due to temporary closure of roads), they will adopt the principle that they will use the same standard of road, or higher where practicable and available. The Applicant has applied this principle when selecting diversion routes and has provided information consistent with that of consented Development Consent Orders. The Applicant will nonetheless continue discussions with Essex County Council regarding the Traffic Regulation Orders to understand any concerns about specific diversion routes.</p>	<p>ECC welcome continued discussions on TROs as ECC does not have the level of information necessary for a consultation on this subject.</p>
4.5.109	<p>The Applicant will begin discussions with the host local highway authorities and National Highways before Deadline 3 on the recovery of appropriate costs through a Planning Performance Agreement (PPA).</p>	<p>ECC welcomes discussions on this point prior to the end of the Examination.</p>

4.5.10	The Applicant acknowledges Essex County Council's summary of matters and will take it into account during forthcoming discussions with Essex County Council on recovering appropriate costs through a Planning Performance Agreement (PPA).	ECC welcomes discussions on this point prior to the end of the Examination.
4.5.112	The Applicant will continue to discuss mitigation and controls for managing impact on the Local Highway Network with Essex County Council.	ECC welcomes discussions on this point prior to the end of the Examination.
6.20.4	The Applicant will continue discussions with Essex County Council regarding the interface of the Project with any new schools that are linked to new developments.	ECC requests that this is included as a commitment in the CTMP (APP-309). See wording provided by ECC into CTMP in the EXQ1 ref. TT 1.36).
6.20.5	National Policy Statement EN-1 (2024), paragraph 5.14.12 details that 'all stages of the project should support and prioritise a modal shift of freight from road to a more environmentally sustainable alternative.' 7.11 Transport Assessment - Appendix G - Multi Modal Transport Report [APP-340] provides detail of the assessment undertaken by the Applicant, to reduce the amount of distance travelled on road by freight vehicles. The Applicant and the Main Works Contractor(s) are continuing discussions with the operators of multi-modal sites, with the intention of these being used to source materials where possible. The Applicant has committed to engage with the Developer's Forum and is happy to discuss with other developers the opportunities to reduce long distance road freight deliveries.	ECC requests that this is included as a commitment in the CTMP (APP-309). See wording provided by ECC into CTMP in the EXQ1 (ref. TT 1.36).

6.20.6	<p>The front-loaded scenario was included within the assessment detailed in 7.11 Transport Assessment [APP-333]. This was completed to understand if any additional mitigation, above the 'just-in-time' scenario was required on road links from the Ports to the Primary Access Routes (PARs). The shorter timeframe in the front-loaded scenario resulted in higher impacts on the PARs but experienced over shorter periods of time. The Applicant and Main Works Contractor(s) will continue discussions with the Local Highway Authority when additional information on sourcing is available. The monitoring and management principles detailed in 7.3 Outline Construction Traffic Management Plan [APP-309] are applicable to either scenario, with the Main Works Contractor(s) monitoring the number of HGVs accepted into site. The Applicant will adhere to the National Policy Statement EN-1 (2024), paragraph 5.14.13 requirements and will continue to engage with Essex County Council during the development of material sourcing. The Applicant does not consider the 7.3 Outline Construction Traffic Management Plan [APP-309] to be the appropriate document for securing this requirement.</p>	<p>ECC requests that this is included as a commitment in the CTMP (APP-309). See wording provided by ECC into CTMP in the EXQ1 (ref. TT 1.36).</p>
6.20.9	<p>The Applicant will continue engagement with Essex County Council to understand the requested commitment.</p>	<p>ECC require a commitment in the CTMP (APP-309) for a road safety review. See wording provided by ECC into CTMP (APP-309) in the EXQ1 (ref. TT 1.36) in relation to this point.</p>

6.20.10	As stated within 7.3 Outline Construction Traffic Management Plan [APP-309] the use of contingency routes is proposed in circumstances where traffic movements on the road network are compromised, including the use of the agreed Primary Access Routes and Site Access Points. Contingency routes will be provided by pre-established traffic diversions and diversions set out by National Highways, the Local Highway Authority and the police.	See wording provided by ECC into CTMP (APP-309) in the EXQ1 (ref. TT 1.36).
6.20.11	The Applicant notes this comment and confirms that the Main Works Contractor(s), in partnership with North Falls and Five Estuaries, will undertake a comprehensive investigation of the construction of Bentley Road to inform and coordinate the detailed design of the works.	ECC requests that this is included as a commitment in the CTMP. See wording provided by ECC into CTMP (APP-309) in the EXQ1 (ref. TT 1.36).
6.20.12	<p><i>Outline CTMP (Final Issue A) (APP-309)</i></p> <p>The Applicant will continue engagement with Essex County Council to mitigate impact on the road network and amendments to the Construction Traffic Management Plan.</p>	See wording provided by ECC into CTMP (APP-309) in the EXQ1 (ref. TT 1.36) for all additional commitments required.
6.21.5	<p><i>Outline CTMP (Final Issue A) (APP-309)</i></p> <p>The Applicant notes this comment.</p> <p>As the locations of construction staff are not yet known, it is not currently possible to accurately identify which public transport corridors/hubs are likely to experience high usage. When additional information is available,</p>	ECC requests that a commitment to implementing a shuttle bus service to/from key transport hubs and/or locations to the compounds is included as a requirement in the CWTP. ECC believes this is necessary to mitigate the impacts on the local highway network.

	discussions will be undertaken to identify opportunities to support multi-modal public transport journeys to site. Should a minibus or shuttle service from local public transport hubs be identified as a measure, further detail will be included in the final Construction Worker Travel Plan.	
6.21.6	The Main Works Contractor(s) will develop the final Construction Worker Travel Plan. It is expected that within this process, they will engage with the Local Highway Authorities on the appropriate methodologies to encourage construction workers to travel to the site via more sustainable modes. Best practice from other Development Consent Orders will be used to inform this discussion. The location of construction staff is currently unknown. Once this information becomes available, it is expected that the Main Work(s) Contractor and Travel Plan Coordinator will identify clusters to inform the proposed staff mitigation measures, where required. This could include the provision of a minibus and other measures.	See response to item above to paragraph 6.21.5 as related.
6.21.7	In line with the Construction Design and Management Regulations 2015, the Main Works Contractor(s) will ensure every worker is provided a suitable site induction before starting construction work. As set out in paragraph 7.2.2 of the 7.3 Outline Construction Traffic Management Plan – Appendix B - Outline Construction Worker Travel Plan [APP-311], the information pack	The CWTP should be updated to include a commitment for the information pack to be provided to staff prior to being on site.

	will be issued to sub-contractors upon appointment and incorporated into their Project induction. The subcontractor will be encouraged to share this information with staff as early as practicable to support staff travel choices.	
6.21.9	The Applicant notes this comment. Section 7.6 of the 7.3 Outline Construction Traffic Management Plan – Appendix B - Outline Construction Worker Travel Plan [APP-311] sets the initiatives that will be implemented by the Travel Plan Coordinator (TPC) to encourage cycling, including the provision of an adequate number of cycle stands on site. The Main Works Contractor(s) will work with the Local Highway Authorities to ensure cycle parking standards are met. The Main Works Contractor(s) will be encouraged to share this information as early as practicable for staff working on site. Section 3.2 of the 7.3 Outline Construction Traffic Management Plan [APP-309] provides an overview of the site-specific induction that all staff and operatives working on the Project will receive. Site car parking arrangements are included within the induction topics. Construction worker overspill parking on the public highway has been identified as a matter of non compliance and would follow the non-Compliance procedure in Section 6.3 of the 7.3 Outline Construction Traffic Management Plan [APP-309].	See wording provided by ECC into CTMP (APP-309) in the EXQ1 (ref. TT 1.36).
6.21.10	The Main Works Contractor(s) will develop the final Construction	ECC requested that the monitoring and review, and target setting

	<p>Worker Travel Plan (CWTP). Monitoring the final CWTP will be central to ensuring its aims are delivered in practice. As set out in Section 8 of 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311], the Travel Plan Coordinator will monitor travel throughout the construction phase and will report the findings in the quarterly reports, shared with the Applicant, the Main Works Contractor(s) and the Local Highway Authority. Mode-share information will be collected on a regular basis at site check-in. The modal split and parking accumulation information will be used to monitor travel choices to and from the site. Information showing the modal split of staff will be published in monthly cascades and on-site notice boards.</p>	<p>should relate to the specific groups of staff so that it can be related back to the assumptions in the assessment (ie office staff – vehicle occupancy of 1, and construction workers – vehicle occupancy of 2).</p> <p>It is unclear why the baseline and future targets cannot be set now in the CTWP based on the assessment assumptions. This will make it clear for the Contractor as they develop the detailed CTWP. In ECC’s experience it seems that the Contractor tends to focus on the management documents of the DCO rather than immersing themselves into the detailed assessment documents. The assumptions in the assessment are clear and it is logical that this follows through into the CTWP.</p>
6.21.11	<p>The targets noted in 7.3 Outline Construction Traffic Management Plan - Appendix B – Outline Construction Worker Travel Plan [APP-311] are defined in principle, with the Main Work(s) Contractor developing the final Construction Worker Travel Plan. 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]. Section 6.4 of the 7.11 Transport Assessment [APP-333] provides an overview of the construction staff occupancy assumptions. Office-</p>	<p>See response above for 6.21.10 as related to 6.21.11.</p>

	<p>based staff have an assumed vehicle occupancy of one as a worst case, as less information about their movement patterns are known. The Overhead Line and Cables and Substation construction workers are assumed to stay in similar hotels, and hence a vehicle occupancy of two has been used, with a 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. It is anticipated that the Main Works Contractor(s) will develop the final Construction Worker Travel Plan to include a baseline, where the baseline targets are reflective of the assessment undertaken.</p>	
6.21.13	<p>It is envisaged that the use of a crew vehicle will become the working practice of the Main Works Contractor(s), as outlined in 7.3 Outline Construction Traffic Management Plan - Appendix B Outline Construction Worker Travel Plan [APP-311]. The targets noted within the Outline Construction Worker Travel Plan are defined in principle, with the Main Work(s) Contractor developing the final plan.</p>	<p>ECC require the CTWP (APP-311) to include a commitment to the use of a crew vehicle for the overhead line workers travelling from compound to sites.</p>
6.21.14	<p>The Applicant confirms that where Public Rights of Way (PRoWs) are managed on their existing alignment, or diverted, public access will be maintained throughout construction in accordance with the 7.6 Outline Public Rights of Way Management</p>	<p>See wording provided by ECC into PRoW Management Plan in the EXQ1 (ref. PRoW 1.1).</p>

	<p>Plan [APP-329]. However, the 7.6 Outline Public Rights of Way Management Plan [APP-329] also notes that, at locations where PRoWs interact with haul roads or certain construction activities, temporary holding of PRoW users, or management of crossings, may be required to ensure safety. Site-specific management measures and any temporary diversions will be developed by the Applicant and its Main Works Contractor, based on detailed design information. These will be discussed with PRoW Officers at the relevant Local Highway Authorities during preparation of the final PRoW Management Plan. The final PRoW Management Plan will be submitted to, and approved by, the Local Planning Authority.</p>	
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*Essex County Council – Biodiversity, Ecology and Nature Conservation (Ecology and Biodiversity)*

- 5.3. It is noted that the Applicant is holding firm on the 5-year management for replacement planting outside of the Environmental Areas (paragraphs 3.12.21-3.12.25; see also 3.13.11-3.13.16). It is claimed that 5 years will be sufficient to deliver largely successful habitat reinstatement. The Applicant has provided some reference to support that 5 years is a minimum planting management target (by reference to Bramford to Twinstead and the Yorkshire Green Energy DCOs), and has made reference to the Outline Landscape and Ecological Management Plan stating that planting will “follow general best practice principles” outlines in British Standards Institution (2014) BS 8545:2014, which focuses on trees. This does not answer ECC’s concerns about habitat re-establishment. The Rampion 2 DCO, for example, required all habitats created and reinstated to be monitored and managed for at least 10 years (or 30 years where they count towards BNG). ECC considers that securing just the minimum 5 year period outside of Environmental Areas is a level of commitment that is likely to result in a degree of reinstatement failure, particularly in relation to certain types of habitat (see paragraph 5.24 below). While ECC welcomes the Applicant’s commitment to the 5-year period being adaptive

(paragraph 3.13.15), the extent to what adaptive entails is very limited and it is noted that there is nothing explicit in the OLEMP about any extensions to the 5 year aftercare period e.g. even when planting failures have been identified. Without more information and certainty around how this adaptive provision would work in practice to address any planting failures, this does not address ECC's concern.

- 5.4. The Applicant has stated within the Applicant's response to the Local Impact Report (REP2-030) the bat roost tree mitigation will be via a Project-wide Natural England mitigation licence where likely impacts are assessed and *"a percentage of all trees with PRFs likely to support roosting bats has been agreed with Natural England"*. The draft Project-wide licence will set out appropriate mitigation measures for each different species and roost type likely to be encountered. This will include measures such as provision of bat boxes and tree veteranisation. It is noted that this is moving in a positive direction, but ECC requires more clarification and the final compensation plan remains to be seen. It would be preferable to see the details of this draft Project-wide bat mitigation licence before consent.
- 5.5. ECC welcomes that the Applicant has agreed the concept of an Ecology Working Group (Table 4.10, row ID 9.10, pg 298), as that was previously a key area of disagreement (paragraph 4.6.3). ECC notes that the Applicant suggests that the Ecology Working Group will be formed post-consent to *"provide progress updates on ecological mitigation"* (Table 4.10, row ID 9.10, pg 298). The group would be operative during the construction period. ECC requests a more defined scope granted to the remit of the working group, such as reviewing results, proposing changes, potentially making site inspections, etc. ECC welcomes that the next iteration of the Outline Landscape and Ecological Management Plan will be updated to include the requirement for a post-consent Ecology Working Group and will comment on the wording that the Applicant proposes.
- 5.6. The commitment to the quality of the Ecological Clerk of Works ("ECoW") provision is still weak. ECC welcomes that the Applicant has confirmed there will be multiple ECoWs employed on the project. The Applicant states at Table 4.10 (row ID 9.55, pg 300) *"Further detail on the multiple specific individuals undertaking these roles [ECoW] would be available post-consent as part of the final Landscape and Ecological Management Plan/s."* This is too vague and should not be left to be addressed after the examination process. As ECC requested at LIR paragraph 6.17.1, a commitment / requirement should be made regarding the minimum qualifications / experience of the ECoWs to be used, together with clarity regarding the ECoW decision capability and hierarchy.

- 5.7. Broadly speaking, the Applicant's position in respect of Biodiversity Net Gain ("BNG") position seems unaltered.

*Socio-economics, Recreation and Tourism*

- 5.8. In respect of paragraph 3.16.8-3.16.11 of the Applicant's Comments on Local Impact Reports (Final Issue A) (REP2-030), ECC welcomes the commitment to the Applicant preparing a Employment and Skills Plan. This is in line with other projects. ECC welcomes the Applicant's commitment to engage with Host Planning Authorities and relevant stakeholders on the scope of the Employment and Sills Plan and hopes that means that the detail will be developed and agreed with all key local stakeholders.
- 5.9. ECC still considers that an employment and skills financial contribution is of vital importance and will seek further discussions with the Applicant on this matter.

*Historic Environment*

- 5.10. Place Services is providing a response with regard to archaeology for ECC on behalf of Colchester, Tendring, Chelmsford, Basildon, Brentwood and Thurrock planning authority areas.
- 5.11. Historic Environment is included under section 4.9 and Table 4.16 of the Applicant's Comments on Local Impact Reports (Final Issue A) (REP2-030) and provides the Applicant's response to new matters and clarifications from the Local Impact Report.
- 5.12. ECC Place Services (Archaeology) agrees with the Applicants statement (4.9.3) that for archaeology " *the key areas of disagreement remain around ....the archaeological evaluation and historic environment mitigation provisions within control documents and 3.1 Draft Development Consent Order [APP-056].*" This is reflected in the Statement of Common Ground with three key matters identified as not agreed, including: Sufficient survey data to inform the assessment, mitigation measures and draft DCO.
- 5.13. The following points raised in ECC's LIR (REP1-131) have not been resolved.
- Provision of sufficient data
- 5.14. The Applicant has responded to points including 4.13.25, 4.13.36-39 and 8.250-255 which relate to ECC's disagreement in regards to the level of intrusive fieldwork that would be considered sufficient to determine consent by the Planning Inspectorate

and the Secretary of State. More specifically it relates to the completion and reporting of the ongoing geophysical survey and trial trench evaluation.

- 5.15. An update on the level of completed field evaluation is provided by the Applicant in Section 4.9.1 *“Geophysical survey has been undertaken across 96% of priority areas and 30% of phase 2 areas, at the point of submission of Supplementary Environmental Information [AS-068 to AS-083]. This represents a combined total of 74% of the overall geophysical survey area. The phase 2 survey is currently ongoing. Archaeological trial trenching has been completed for 89% of priority areas at the point of submission of Supplementary Environmental Information [AS-068 to AS-083].”*
- 5.16. The results of ongoing investigations are shared with the Local Planning Authority Archaeological Advisors at monthly meetings. It is unlikely that the evaluation will be completed prior to determination and more significantly, the results of those investigations are likely to be provided as interim reports rather than being supplied as full reports . The lack of information available from the interim reports will significantly limit the conclusions that can be drawn about the archaeological potential of the proposed scheme area and of the potential impacts.
- 5.17. The Applicant’s response does not fully address the potential issues that may arise from lack of completion of the evaluation nor does it include any information on how this information will be fully reported on within the determination period.
- 5.18. As a result, this remains a concern where evaluation has not yet been completed in areas of known high archaeological and geoarchaeological potential. One area, within Colchester District, identified by a dense cropmark complex, likely representing a multi-period settlement, is located adjacent to the River Stour. This area also has significant geoarchaeological sediments and deposits with palaeoenvironmental evidence. The site would be considered to have a high overall value in terms of evidential value and period representation. The scheme design at this location includes underground cables and HDD beneath the river. Impacts are considered to be high and unavoidable. There is therefore potential that the ongoing (or future) trial trench evaluations may yet identify high value archaeological sites or those that have a potential equivalence in policy terms to a designated heritage asset (as referred to in EN 1 para 5.9.8). The impact upon this asset could result in a high degree of harm or a significant effect in EIA terms.

- Mitigation measures

- 5.19. Many of the Applicant's responses to points raised in the LIR (REP1-161) make reference to the Outline Archaeological Mitigation Strategy-Outline Written Scheme of Investigation (OAMS-OWSI) (APP-328). This document will be a control document for any mitigation and is directly referenced in the DCO. At present this document remains a draft, is unapproved, and does not demonstrate a clear, deliverable programme to evaluate and mitigate the development impacts. The Applicant has received comments from the relevant authorities and Historic England and has indicated that a revised version will be available for review by Deadline 4. This document will need to be agreed and accepted by the relevant authorities to ensure timely discharge of Requirements following consent, as archaeology is often dealt with early in the pre-construction process. It has been demonstrated on other National Grid NSIPs that failure to agree this document can lead to significant delays to the programme.
- 5.20. It is considered that the matter raised within the LIR regarding Protected Lanes have been resolved. A number of points were raised by local authorities within Essex and ECC which included Protected Lanes that could be impacted by the development. This includes points 4.13.40, 6.16.5-6, 6.22.5, 6.52, 8.281-282, and 8.256. The Applicant states that 7.4 Outline Landscape and Ecological Management Plan [Revision C] [REP2-019] includes measures to protect and reinstate historic landscape features including protected lanes, in addition to the commitment set out in the revised H06 of 7.2 Outline Code of Construction Practice [Revision B] [REP2-015 & REP2-017].
- 5.21. While further measures have been included to mitigate harm to any Protected Lanes there may remain impact to the setting and historic integrity of the lane. This is discussed further in the response to ExA's written questions ExQ1 HE 1.39

#### *Green Infrastructure*

- 5.22. In respect of Paragraphs 3.13.4 – 10 regarding the Approach to Biodiversity Net Gain, ECC acknowledges the Applicant's commitment to delivering a minimum of 10% Biodiversity Net Gain (BNG) for hedgerows and watercourses. ECC welcomes that the Applicant states that 10% is not treated as a cap, and that opportunities to deliver more than the statutory minimum will be explored where viable.
- 5.23. From a Green Infrastructure (GI) perspective, ECC supports the principle of exceeding minimum BNG requirements where viable, where this can deliver wider

multifunctional benefits, including habitat connectivity, landscape-scale linkages, carbon sequestration, water management and community amenity. ECC considers that ecological gains must be planned and delivered in a way that reinforces county-level GI priorities, including strengthening strategic habitat opportunities, connectivity and addressing multifunctional deficits identified through the Essex Local Nature Recovery Strategy (LNRS).

- 5.24. Regarding paragraph 3.13.11-16, which consider the Monitoring and Maintenance Period, ECC notes the Applicant's continued reliance on a five-year maintenance period for landscaping, reinstatement and new habitat establishment. While a minimum five-year period may be appropriate for certain soft landscaping types, many GI features, particularly young trees, hedgerows, riparian corridors and other linear habitats, could require longer establishment periods to secure long-term functionality. Accordingly, ECC considers a longer period should properly be secured – see above at paragraph 5.3.
- 5.25. ECC does, however, as a minimum step, welcome the Applicant's statement that the five-year period will be applied adaptively, with extensions triggered where monitoring identifies failure or underperformance. This adaptive management approach is essential to ensure that habitats reach maturity and deliver their expected ecological and GI functions, including connectivity, shading, flood attenuation and long-term landscape resilience.
- 5.26. This position aligns with standard industry practice and the Environment Act's requirements for long-term ecological management. ECC considers such adaptivity essential to avoid the loss or degradation of new GI assets and to ensure that planting contributes meaningfully to both BNG and wider GI outcomes over the project's lifetime.
- 5.27. Off-site Delivery of BNG / Legal Agreement Securing Off-site BNG is addressed in paragraphs 3.13.17 – 20. ECC welcomes the Applicant's ambition to deliver a "biodiversity legacy" across the three counties affected by the scheme and to deliver BNG locally. ECC also notes and welcomes the confirmation in the Applicant's comments on Relevant Representations that the Essex Local Nature Recovery Strategy (LNRS) will be "taken into consideration."
- 5.28. Again, while this is a good first step, ECC maintains that the LNRS priorities must actively shape the overall project design and BNG strategy, including:
- the siting, scale and function of Environmental Areas.
  - the creation, enhancement and strengthening of on-site GI corridors.

- species selection and habitat typologies used across the project.
  - opportunities to deliver strategic ecological connectivity; and
  - alignment with wider nature recovery and GI networks across Essex.
- 5.29. ECC does not agree with the Applicant’s assertion that a DCO Requirement is “not necessary or appropriate” for securing BNG delivery.
- 5.30. For statutory BNG to be secured, both national policy and NSIP precedent require enforceable mechanisms at the point of consent. This typically involves:
- a DCO Requirement obligating submission and approval of a BNG Scheme prior to commencement; and
  - where off-site BNG is required, a legal agreement securing land, management, monitoring and reporting for no less than 30 years.
- 5.31. The Applicant’s relating to obligations designed to secure at least 10% BNG. Without such mechanisms, neither BNG delivery nor long-term GI value can properly be secured.
- 5.32. ECC recognises the Applicant’s stated support for Environmental Net Gain (ENG) including GI within paragraphs 3.13.21-26 and the acknowledgement that GI may be a consideration in BNG site selection. GI is only referenced in relation to BNG delivery, rather than being integrated into the design, mitigation and landscape strategy for the scheme as a whole. This represents a missed opportunity to deliver the full range of GI functions anticipated by NPS EN-1 (2024), including water management, shading, urban cooling, recreational access, ecological connectivity and wider landscape resilience. It is noted that the Applicant will explore the multifunctionality and wider benefits through BNG delivery.
- 5.33. Furthermore, by deferring all meaningful GI detail to the post-consent BNG Report, the Applicant provides no certainty that GI will be delivered in line with local GI strategies and the LNRS county-level nature recovery priorities. ECC therefore maintains that GI outcomes must be embedded earlier, explicitly and securely within the DCO, and not left to post-consent documentation.

Schedule of Changes to the Draft DCO (REP2-005 & REP2-008)

*Historic Environment*

- 5.34. ECC’s LIR [REP1-161] requested amendments to 5(4) of the draft DCO [APP-056] to include the requirement for the submission of a detailed WSI for any pre-

commencement operations. The Applicant states at REP2-030 that it considers that the outline management plans [APP-328] provide effective control over all pre-commencement works and operations, noting that the approach mirrors that adopted on other recent projects, including the Bramford to Twinstead project. ECC responds in detail in Appendix 1 in answer to the ExA's Questions (DCO1.S8). The agreement of an appropriate OAMS-OWSI within the determination period is critical to the undertaking of appropriate and timely archaeological and geoarchaeological mitigation post consent.

- 5.35. An additional point, 5(5), was also requested to secure provision of a post excavation report, publication and archive. The Applicant does not consider it necessary to amend Requirement 5 to include post-excavation works. It states (paragraph 3.18.14) the preparation of the Project archive, post excavation assessment and subsequent analysis and publication phases would be undertaken in accordance with the DWSI(s).
- 5.36. At present the DCO wording for Archaeology [REP2-005 and 008] does not secure timescales for delivery of the Post-Excavation Assessments. This will be required to ensure the post-excavation process can be tracked and monitored to ensure sign off of each stage through the production of fieldwork results and long-term storage where appropriate.
- 5.37. This is also discussed further in the response to ExA's written questions ExQ1 DCO 1.S8.

#### *Green Infrastructure*

- 5.38. ECC notes that there have been no changes regarding GI, therefore previous commentary on the DCO remains applicable. These included the absence of explicit Biodiversity Net Gain (BNG) requirements, including the statutory 10% minimum, a BNG Plan, and monitoring provisions (although it is noted that the Applicant feels this is not necessary), as well as no clear alignment with Essex's LNRS priorities. GI continues to be referenced only indirectly through landscaping, with no requirement for a broader, integrated GI approach or requirement for GI strategy/framework

#### 8.4.1 Applicant's Comments on Relevant Representations (Tracked) (Final Issue B) (REP2-023)

- 5.39. ECC has no objections to the amendments made within Table 2.1 of the Applicant's Responses to Relevant Representations, specifically those under the themes of

Environment, Landscape and Visual, Water (from page 47), and Biodiversity, Ecology and Nature Conservation (from page 100). However, as there are no significant changes to the summary of matters raised or to the Applicant's responses within Appendix O (ECC responses), ECC confirms that its previous comments submitted on 10 March 2026 remain valid.

- 5.40. ECC reiterates the continued need for: (1) clear and consistent distinction between mitigation, enhancement and compensation to ensure transparent BNG accounting; (2) spatial mapping demonstrating the function and alignment of on-site GI corridors, and how LNRS priorities have informed the Project's GI, habitat and Environmental Area design rather than being limited solely to off-site BNG; and (3) evidence of alignment with the Essex Green Infrastructure Standards, including a transparent methodology for BNG site selection and identification of on-site opportunity areas.

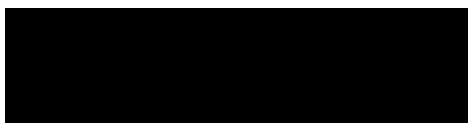
7.15 Design and Access Statement (Tracked) (Final Issue B) (REP2-020) / 7.4 Outline Landscape and Ecological Management Plan (Tracked) (Final Issue C) ("OLEMP") (REP2-018)

- 5.41. It is noted that neither of these documents address commentary raised in respect of GI. In brief, embedding Essex LNRS and Essex GI Standards within the Design Principles would secure that measures deliver multifunctional benefits such as habitat connectivity, climate resilience, and improved access.
- 5.42. ECC continues to recommend that opportunities for habitat restoration, hedgerow enhancement and riparian improvements are clearly identified, particularly in sensitive areas such as Dedham Vale National Landscape, and that the Applicant works collaboratively with Local Nature Partnerships, wildlife organisations and local authorities to co-design GI and BNG interventions that contribute to wider ecological networks.
- 5.43. In respect of the updated OLEMP, ECC's commentary continues not to be addressed particularly regarding alignment with Essex's LNRS priorities, and securing a Biodiversity Gain Plan and Habitat Management and Monitoring Plan. These issues were raised in ECC's Relevant Representation (Oct 2025) and acknowledged in the Applicant's responses.

Revised draft DCO (REP2-004)

- 5.44. Commentary provided to date have been largely concentrated in section 5 of the LIR (REP1-161), covering the Articles, Requirements, discharge of requirements, protective provisions and certified documents, with the main additional DCO-related points in REP2-036 being the need to secure the drainage strategy in the dDCO and a design requirement for the EACN/substations to align with the Joint Substations Design Guide and colour palette. ECC has checked those points against the current Revision B tracked dDCO (REP2-004) and provides commentary where matters have and have not been addressed by National Grid (Appendix 2). ECC will ensure these matters are appropriately considered within the revised SoCG.
- ii. With regards to the SoCG, it is anticipated the Applicant will afford ECC the opportunity to review and provide commentary on an updated version of the SoCG. Following engagement with the Applicant, the latest iteration is expected to be issued to ECC for comment on 17 April. ECC will seek to engage accordingly to ensure the ExA is provided with the latest position on the matters within the SoCG, including those referenced above at Deadline 4.
- iii. ECC welcomes the opportunity to submit this Deadline 3 response. ECC will continue to engage proactively with the applicant and the Examining Authority as this application progress through Examination.

Yours sincerely,



Head of Planning and Sustainable Development

Enc.

- Appendix 1: ECC responses to ExQ1
  - Appendix 1A: A17.2.6 Long list and short list of Other Developments – Essex County Council Comments
  - Appendix 1B: Bats and Artificial Lighting

- Appendix 1C: 10.36 OnSS operational noise and the noise complaints protocol Revision D - Tracked
- Appendix 2: ECC commentary on the revised draft DCO (REP2-004)