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Revision History

Version	Date	Submitted at
A	29 August 2025	DCO Application
B	26 February 2026	Deadline 1
<u>C</u>	<u>12 May 2026</u>	<u>Deadline 4</u>

National Highways

Draft Statement of Common Ground

1. Purpose of the Statement of Common Ground

This Statement of Common Ground (SoCG) has been prepared to outline the areas of agreement and any remaining points of discussion between National Grid and National Highways regarding transport impacts in relation to the proposed Norwich to Tilbury Project.

The aim is to clarify the shared understanding of any issues and facilitate an efficient resolution process.

2. Parties to the SoCG

This SoCG is agreed between National Grid and National Highways.

3. Summary of Matters Under Discussion

As requested by the Examining Authority, the below table provides an ‘at a glance’ summary of matters which are under discussion, together with a deadline by which such matters are expected to be resolved.

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
<u>6.1.2 – Study area</u>	<u>National Highways is reviewing additional information provided by the Applicant with regards to the modelling of the A12 Junction 25.</u>	<u>Deadline 4</u>
<u>6.1.3 – Data sources</u>	<u>National Highways is reviewing additional information provided by the Applicant.</u>	<u>Deadline 4</u>
<u>6.1.4 – Assessment methodology</u>	<u>Discussions ongoing for the need of micro-simulation modelling on the A120/Long Green/B11108/Cressing Road Junction, the A120/A131/B1256 Roundabout and B1018/Millennium Way.</u>	<u>Deadline 4</u>
<u>6.1.5 – Key parameters and assumptions</u>	<u>Request for further information regarding the methodology, assumptions used, trip generation and assignment.</u>	<u>Deadline 4</u>
<u>6.1.6 – Baseline conditions and</u>	<u>A review of collision data over a five-year period (excluding COVID-19) was undertaken by the Applicant. The Applicant expects to submit an addendum to the TA at Deadline 4</u>	<u>Deadline 4</u>

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
<u>receptors</u>	<u>which present the findings of the updated collision analysis.</u>	
<u>6.1.7 – Embedded mitigation</u>	<u>National Highways raised concern that all potential impacts of the Project on the Strategic Road Network may have not been assessed.</u>	<u>Deadline 4</u>
<u>6.1.8 – Standard mitigation</u>	<u>National Highways is reviewing the traffic modelling results provided by the Applicant. Discussions ongoing.</u>	<u>Deadline 4</u>
<u>6.1.9 – Additional mitigation</u>	<u>National Highways is reviewing the traffic modelling results provided by the Applicant. Discussions ongoing.</u>	<u>Deadline 4</u>
<u>6.1.10 – Construction effects</u>	<u>National Highways is reviewing the traffic modelling undertaken by the Applicant. Discussions ongoing.</u>	<u>Deadline 4</u>
<u>6.1.11 – Outline CoCP</u>	<u>The modelling and mitigation need to be agreed by National Highways before it can endorse the Outline CoCP.</u>	<u>Deadline 4</u>
<u>6.1.13 – Study area</u>	<u>National Highways has raised additional junctions to undergo assessment. The Applicant expanded the assessment scope and identified A12 Junction 25 as the only additional junction to require modelling.</u> <u>The trip generation, trip distribution and trip assignment across the whole network needs to be agreed by National Highways.</u>	<u>Deadline 4</u>
<u>6.1.15 – Junction capacity</u>	<u>National Highways has raised additional junctions to undergo assessment. The Applicant expanded the assessment scope and identified A12 Junction 25 as the only additional junction to require modelling.</u>	<u>Deadline 4</u>
<u>6.1.16 – Junction modelling</u>	<u>Outstanding queries in respect of Galley’s Corner, the Asda Roundabout, A14 J55, A12 J26, and M25 J30. The trip generation, trip distribution and trip assignment across the whole network needs to be agreed by National Highways.</u>	<u>Deadline 7</u>
<u>6.1.17 – Assessment of WCH</u>	<u>The Applicant will issue WCHARs and GG104 Risk Assessments for A120/Bentley Road and A12 on slip at the A12 Ipswich Road/B1070 Junction for National Highway to review.</u>	<u>Deadline 4</u>
<u>6.1.19 – Road safety</u>	<u>A review of collision data over a five-year period (excluding COVID-19) was undertaken by the Applicant. The Applicant expects to submit an addendum to the TA at Deadline 4 which present the findings of the updated collision analysis.</u>	<u>Deadline 4</u>
<u>6.1.20 – Mitigation measures</u>	<u>The trip generation, trip distribution and trip assignment across the whole network needs to be agreed for National Highways to understand the impacts on the Strategic Road</u>	<u>Deadline 4</u>

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
	<u>Network and mitigation measures that are required.</u>	
<u>6.1.21 – Baseline conditions</u>	<u>National Highways has stated that this matter is subject to the review of the final versions of the ES and TA.</u>	<u>Deadline 7</u>
<u>6.1.24 – Key assumptions</u>	<u>National Highways is reviewing the additional information provided regarding trip generation, methodology, assumptions and assignment by the Applicant.</u>	<u>Deadline 4</u>
<u>6.1.25 – Methodology</u>	<u>National Highways is reviewing the additional information provided regarding trip generation, methodology, assumptions and assignment by the Applicant.</u>	<u>Deadline 4</u>
<u>6.1.26 – Construction vehicle trips</u>	<u>National Highways is reviewing the additional information provided regarding trip generation and assignment.</u>	<u>Deadline 4</u>
<u>6.1.28 – Overall impact of the Project</u>	<u>National Highways has stated that the conclusions in the TA cannot be agreed until all TA-related issues in this SOCG are addressed.</u>	<u>Deadline 7</u>
<u>6.1.32 – Implementation / Enforcement</u>	<u>Discussion on corrective measures for persistent enforcement breaches. National Highways wishes to agree the controls included within the CTMP.</u>	<u>Deadline 7</u>
<u>6.1.36 – Monitoring and review</u>	<u>Request for National Highways to be consulted during review of monitoring results, for areas that impact the Strategic Road Network. National Highways wishes to agree the controls included within the CTMP.</u>	<u>Deadline 7</u>
<u>6.1.39 – Construction access from National Highways infrastructure</u>	<u>Ongoing discussions relating to TB-B059 site access bellmouth (agreement subject to completion and review of RSA1 and GG104 Risk Assessment).</u>	<u>Deadline 4</u>
<u>6.1.40 – Proposed mitigations impacting National Highways infrastructure</u>	<u>Discussions related to three identified sites is subject to completion and review of RSA1 and GG104 Risk Assessment. National Highways has not ruled out mitigation being required at other locations until junction modelling assessments are complete.</u>	<u>Deadline 7</u>
<u>6.1.40a – Highway mitigation – Copdock Roundabout</u>	<u>A Stage 1 Road Safety Audit is being undertaken for the lane alterations proposed at A14 J55 Copdock Interchange. This will be overseen by National Highways.</u>	<u>Deadline 7</u>
<u>6.1.42 – TROs and tTROs</u>	<u>Further discussions and information requested by National Highways with regards to the proposed traffic regulation orders of the Project.</u>	<u>Deadline 7</u>

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
<u>6.1.47 – Protective provisions</u>	<u>The Applicant and National Highways are continuing discussions to agree a set of Protective Provisions that addresses all of National Highways’ concerns.</u>	<u>Deadline 7</u>
<u>6.1.48 – Compulsory Acquisition of land and property</u>	<u>National Highways objects to the compulsory acquisition of operational land. The Applicant and National Highways have agreed to undertake a detailed assessment of all National Highways land interests, and the rights sought by the Applicant.</u>	<u>Deadline 7</u>
<u>6.1.49 – Overhead lines</u>	<u>Preparation of Section 169 Agreements and Approvals in Principle between the Applicant and National Highways for proposed overhead line crossings along the Strategic Road Network.</u>	<u>Deadline 7</u>
<u>6.1.50 – Underground crossings</u>	<u>National Highways has shared requirements – the Applicant will continue to liaise with National Highways to obtain an Approval in Principle. This is for the underground cabling crossing proposed on the A12.</u>	<u>Deadline 7</u>

4. ~~3.~~ Background

4.1 ~~3.1~~ Description of the Project/Development

National Grid Electricity Transmission plc (‘National Grid’) owns and maintains the national high voltage electricity transmission network throughout England and Wales. The transmission network connects the power from where it is generated to the regional Distribution Network Operators who then supply businesses and homes.

National Grid holds the Transmission Licence for England and Wales, and its statutory duty is to develop and maintain an efficient, coordinated and economical system of electricity transmission and to facilitate competition in the generation and supply of electricity, as set out in the Electricity Act 1989.

National Grid has developed plans for Norwich to Tilbury (referred to as the ‘Project’). The Project would support the UK’s net zero target through the connection of new low carbon energy generation in East Anglia and by reinforcing the transmission network.

The Project comprises reinforcement of the transmission network between the existing Norwich Main Substation in Norfolk and Tilbury Substation in Essex, via Bramford Substation, the new East Anglia Connection Node (EACN) Substation and the new Tilbury North Substation.

The reinforcement is needed because the existing transmission network, even with current upgrading, will not have sufficient capacity for the new renewable energy (a substantial proportion of which would be generated by offshore wind) that is expected to connect to the network over the next 10 years and beyond. Completion of the Project, together with other new

reinforcements across the country, will meet this future energy transmission demand both in East Anglia and across the UK.

The Project is a Nationally Significant Infrastructure Project (NSIP), and National Grid is seeking development consent under statutory procedures set by government. NSIPs are projects of certain types, over a certain size, which are considered by the government to be of national importance, hence permission to build them needs to be given at a national level, by the relevant Secretary of State (in this case the Secretary of State for Energy Security and Net Zero). Instead of applying to the local authority for planning permission, the developer must apply to the Planning Inspectorate for a Development Consent Order (DCO) that would grant development consent.

National Grid will submit an application for development consent to the Planning Inspectorate. The Examining Authority (consisting of one or more examining inspectors), after a period of public examination, would make their recommendation to the Secretary of State for Energy Security and Net Zero, who in turn would decide on whether development consent should be granted for the Project.

The Project is identified as critical to delivering a network which supports the clean power pathways for 2030 delivery.

The Planning Act 2008 places duties on National Grid as the DCO applicant to consult with prescribed or affected persons as well as to take account of responses to consultation and publicity. In accordance with these statutory requirements, National Grid has undertaken two non-statutory and one statutory consultation to inform its proposals, with further recent targeted consultations.—

5. ~~4.~~ Stakeholder Interests

National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). As such, they have responsibilities for managing the SRN in accordance with the requirements of its licence and in general conformity with the requirements of the Highways Act 1980, and to satisfy the reasonable requirements of road safety. For the purposes of the Planning Act 2008 they are a statutory consultee for all proposed applications likely to affect the road or transport operation and/or planning on roads for which the strategic highways company is the highway authority.

National Highway's interest relates to the potential impact of the proposed development on the SRN, which, in the vicinity of this proposal includes the A47, A11, A14, A12, A120, A1089, and a section of the A13.

The chronology of National Grid's engagement with National Highways to date, and the relevant evolution of the Project's design is summarised as follows:

- 2022
 - National Grid presented information on how the Project was evolving from the evaluation of strategic options to a preliminary preferred graduated swathe within which new

infrastructure (pylons and underground cables) could be located, and how access to this could be approached with respect to the Strategic Road Network;

- Technical note shared setting out proposed Traffic and Transport Environmental Impact Assessment methodology;
- Meeting held to discuss the assessment of routes for construction traffic.
- 2023
 - Discussions held around the development of a number of Traffic and Transport aspects relating to the Strategic Road Network, including:
 - Highways assessment methodology, baseline data and survey requirements;
 - Road Safety Audit requirements;
 - Project trip generation methodology;
 - Sensitivity of particular highway links and underlying assumptions for construction trip calculations;
 - Initial construction access route selection.
- 2024
 - Discussions continued around the development of a number of Traffic and Transport aspects relating to the Strategic Road Network, including:
 - Development of the draft Outline Construction Transport Management Plan (CTMP);
 - Development of the draft Transport Assessment (TA);
 - Proposed approaches to routing of Abnormal Indivisible Loads (AILs) during construction;
 - Proposed strategy relating to the use of multi-modal transport facilities;
 - Continued engagement around the progress of Road Safety Audits, including the submission of Road Safety Audit briefs for review by National Highways;
 - Junctions potentially sensitive to construction traffic impacts; and
 - Development of the Project following Statutory Consultation responses.
- 2025
 - Discussions continued around the development of a number of Traffic and Transport aspects relating to the Strategic Road Network, including:
 - Further development of the draft Transport Assessment (TA);
 - Assessments of junction impacts and mitigation measures;
 - Further development of Abnormal Indivisible Load (AIL) routes and measures;
 - Development of proposed Traffic Regulation Orders and Temporary Traffic Regulation Orders¹;
 - Initial development of items to be included within the Statement of Common Ground.

- 2026

- Further engagement on a number of Traffic and Transport matters to be reflected in the Statement of Common Ground.

6. ~~5.~~ Matters Agreed, Not Agreed or Under Discussion

ID	Matter	National Grid's Position	National Highways' Position	Status
EIA – Regulatory, Planning Policy Context and Guidance				
<u>5.1.16.1</u> <u>.1</u>	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Traffic and Transport assessment is presented in 6.15 Environmental Statement Chapter 2 -Key Legislation and Planning Policy Context [APP126], and Chapter 16 -Traffic and Transport [APP-271].</p> <p>All relevant legislation, policy and guidance has<u>have</u> been identified and appropriately considered to inform the assessment.</p>	National Highways agree that the relevant policy and legislation in respect of the SRN has <u>have</u> been appropriately considered.	Agreed
EIA – Approach and Methods				
<u>5.1.26.1</u> <u>.2</u>	Study Area	<p>The study area was agreed through 6.19 Scoping Report [APP-288, APP-290, APP-291, APP-292, APP-293, APP-294, APP-295, APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.</p> <p><u>The Applicant presented an early draft of the Transport Assessment (7.11 Transport Assessment [APP-333]) to the LHAs and National Highways at the Thematic Group Meeting in January 2025 and again ran through the methodology of junction sifting process, junction</u></p>	<p>National Highways considers that additional junctions may be adversely impacted and may need to be assessed.</p> <p><u>Further information provided by the Applicant is currently being reviewed.</u></p>	Under Discussion

ID	Matter	National Grid's Position	National Highways' Position	Status
		<p><u>assessment methodology and cumulative assessment.</u></p> <p><u>The selection methodology and list of junctions deemed sensitive through the sifting process was provided for review by LHA and National Highways at the thematic group meeting held in April 2024, and feedback was used to refine the final selection. As a result of this engagement, several additional junctions were incorporated into the assessment scope, e.g. M25 J30 which does not connect to a Primary Access Route.</u></p> <p><u>A meeting was held with National Highways on 13th January 2026 to discuss junction modelling specific concerns, geometry and traffic inputs/data, the junction modelling selection process and six additional junctions that National Highways indicated, in its relevant representation, may also require traffic modelling. National Grid set out in the meeting its justification for why it does not consider necessary to model these junctions, except for the A12 J25, given the cancellation of the A12 Chelmsford to A120 Widening Scheme in Essex. National Highways is discussing with National Grid the type of modelling to apply to this junction. Following the meeting, National Grid has provided National Highways with further information for its review.</u></p>		

ID	Matter	National Grid's Position	National Highways' Position	Status
		<p>National Grid will continue to engage with National Highways on this matter. <u>A meeting was held to discuss the trip generation and junction modelling with National Highways on 31st March. Following the meeting, National Grid has provided National Highways with further information for its review.</u></p>		
<p>5.1.3<u>6.1.3</u></p>	<p>Data sources</p>	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within 6.15<u>6.16</u> Environmental Statement Chapter 16 -Traffic and Transport [APP-271]. National Grid will provide<u>has submitted</u> the survey data to National Highways for review.</p>	<p>National Highways has requested sight-efis currently reviewing the survey data- for review.</p>	<p>Under Discussion</p>
<p>5.1.4<u>6.1.4</u></p>	<p>Assessment methodology</p>	<p>The methodology for assessing Traffic and Transport was outlined through the 6.19 Scoping Report [APP-288, APP-290, APP-291, APP-292, APP-293, APP-294, APP-295, APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate. <u>This includes junction selection and the type of software packaging used to model the junctions.</u> <u>The Applicant has attended meetings with National Highways to discuss the modelling methodology. This has been accepted except for Site 48: A120/Long Green/B11018/Cressing Road junction (Galley's Corner) and the A120/A131/B1256 (Marks Farm) Roundabout and B1018/Millennium Way,</u></p>	<p>National Highways has a number of outstanding queries regarding the assessment methodology<u>requires further information regarding the trip generation, distribution and assignment, and continues to believe that VISSIIM modelling is required at Galleys Corner/Marks Farm on the A120.</u> <u>National Highways will engage further with the Applicant on these matters.</u></p>	<p>Under Discussion</p>

ID	Matter	National Grid's Position	National Highways' Position	Status
		<u>where the Applicant and National Highways are currently in discussion on the need for micro-simulation modelling to be undertaken. The Applicant will continue to engage with National Highways.</u>		
<u>5.1.56.1</u> <u>.5</u>	Key parameters and assumptions	Key parameters and assumptions associated with the Traffic and Transport assessment are summarised in 6.156.16 Environmental Statement Chapter 16 -Traffic and Transport [APP-271] . The key parameters and assumptions presented are considered appropriate <u>and inclusive of comments made by National Highways during the Thematic Group Meetings</u> . National Grid will continue to engage <u>A meeting was held with National Highways regarding the required information to discuss the trip generation and assignment. The trip generation methodology is covered in the Trip Generation – Key Assumptions item below.</u>	National Highways has requested further information <u>and clarification</u> regarding the methodology and details of all assumptions used, including trip generation and assignment.	Under Discussion
EIA – Baseline Conditions				
<u>5.1.66.1</u> <u>.6</u>	Baseline conditions and receptors	The baseline conditions and receptors for Traffic and Transport are presented in 6.156.16 Environmental Statement Chapter 16 -Traffic and Transport [APP-271] . The baseline conditions and receptors presented are considered appropriate.	National Highways position is subject to review of the traffic survey data and <u>updated collision data to cover a 5-year period excluding COVID-19 period.</u> National Highways also requires further justification for some junctions having	Under Discussion

ID	Matter	National Grid's Position	National Highways' Position	Status
<p>National Grid will continue to engage with National Highways on this matter. A review of collision data over a five year period excluding COVID-19 period has been undertaken. An addendum to 7.11 Transport Assessment [APP-333] is to be submitted during examination at Deadline 4 which will present the findings of the updated collision analysis. In addition, the addendum will include a summary of all baseline data used within all additional modelling undertaken at SRN junctions and the findings of further assessment. The Applicant will continue to engage with National Highways.</p> <p>been excluded from the assessment. National Highways welcomes the submission of additional information into the examination and will continue review this information as it becomes available.</p>				
<p>EIA – Embedded, Standard and Additional Mitigation Measures</p>				
<p>5.1.7<u>6.1.7</u></p>	<p>Embedded mitigation</p>	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Traffic and Transport effects, are set out in 6.15<u>6.16</u> Environmental Statement Chapter 16 -Traffic and Transport [APP-271]. 7.3 Outline Construction Management Plan [APP-309] includes all relevant construction related mitigation measures and traffic routing. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>National Grid will continue to engage with<u>would welcome a breakdown of matters connected with impacts assessment which</u> National Highways on-</p>	<p>National Highways is not yet satisfied that all the potential impacts of the project on the SRN have been assessed and therefore cannot be certain that additional mitigation is not yet required. National Highways also has further questions of the Applicant regarding the assessment of proposed mitigation.</p>	<p>Under Discussion</p>

ID	Matter	National Grid's Position	National Highways' Position	Status
		this matter would require to reach mutual agreement following review of information/data submitted for review.		
<u>5.1.8</u> <u>6.1</u> <u>.8</u>	Standard mitigation	Standard mitigation measures to reduce potential Traffic and Transport effects during construction are summarised in 6.156.16 Environmental Statement Chapter 16 -Traffic and Transport [APP-271] and set out in 7.2 Outline Code of Construction Practice [APP-300] . The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. National Grid will continue to engage with National Highways on this matter.	National Highways position is reserved until the results of the traffic modelling are understood and agreed.	Under Discussion
<u>5.1.9</u> <u>6.1</u> <u>.9</u>	Additional mitigation	The consideration of additional mitigation measures are presented in 6.156.16 Environmental Statement Chapter 16 -Traffic and Transport [APP-271] . Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. National Grid will continue to engage with National Highways on this matter.	National Highways position is reserved until the results of the traffic modelling are understood and agreed.	Under Discussion
EIA – Assessment Conclusions				
<u>5.1.10</u> <u>6.1</u> <u>1.10</u>	Construction effects	The assessment of effects during construction is presented in 6.156.16 Environmental Statement Chapter 16 -Traffic and Transport [APP-271] . The assessment of effects during construction	National Highways is reviewing the traffic modelling undertaken by the Applicant in detail and discussions are	Under Discussion

ID	Matter	National Grid's Position	National Highways' Position	Status
		presented is considered appropriate. National Grid will continue to engage with National Highways on this matter.	ongoing.	
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
5.4.146.1.11	Outline CoCP	The Outline CoCP includes all relevant construction related mitigation measures specified in 6.156.16 Environmental Statement Chapter 16 -Traffic and Transport [APP-271] and is appropriate for managing construction impacts from the Project. National Grid will continue to engage with National Highways on this matter.	The modelling and mitigation need to be agreed before National Highways can endorse the outline CoCP.	Under Discussion
Transport Assessment (TA) – Regulatory, Planning Policy Context and Guidance				
5.4.126.1.12	Policy and Legislation	The policy context, legislation and guidance considered when undertaking the Traffic and Transport assessment is presented in 7.11 Transport Assessment Chapter 3 – Key Planning Policy Context [APP-333] . All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	National Highways is content that all relevant policy, legislation and guidance has been considered.	Agreed
Transport Assessment – Approach and Methods				
5.4.136.1.13	Study Area	The study area comprises all roads along the PARs, wider road network (SRN/MRN) that might experience changes in traffic patterns resulting from the Project, PRow and WCH routes that	National Highways considers that some additional junctions should <u>may need to</u> be included in the study area and assessed for the construction impact of	Under Discussion

ID	Matter	National Grid's Position	National Highways' Position	Status
		<p>interact with the haul roads within the Order Limits and the PARs as presented within 7.11 Transport Assessment Chapter 2 – Project Description [APP-333]. The Study Area is considered appropriate for the assessment.</p> <p><u>National Grid presented an early draft of the Transport Assessment (7.11 Transport Assessment [APP-333]) to the LHAs and National Highways at the Thematic Group Meeting in January 2025 and again ran through the methodology of junction sifting process, junction assessment methodology and cumulative assessment.</u></p> <p><u>The selection methodology and list of junctions deemed sensitive through the sifting process was provided for review by LHA and National Highways at the thematic group meeting held in April 2024, and feedback was used to refine the final selection. As a result of this engagement, several additional junctions were incorporated into the assessment scope, e.g. M25 J30 which does not connect to a Primary Access Route.</u></p> <p><u>National Grid set out in the meeting of 13th January 2026 its justification for why it does not consider necessary to model any additional junctions, except for the A12 J25, given the cancellation of the A12 Chelmsford to A120 Widening Scheme in Essex.</u></p>	<p>the project. National Highways needs to agree the trip generation, trip distribution and trip assignment across the network as a whole before the study area can be agreed.</p>	

ID	Matter	National Grid's Position	National Highways' Position	Status
		<p>National Grid will continue to engage with National Highways on this matter. A meeting was held to discuss the trip generation and junction modelling with National Highways on 31st March. Following the meeting, National Grid has provided National Highways with further information for its review.</p>		
<p><u>5.1.146.1.14</u></p>	<p>Multi-Modal Strategy</p>	<p>A multi-modal assessment has been undertaken to examine opportunities to use rail and water borne transport modes to supply materials for the construction of the Project and reduce movements on the wider highway network as presented. Multi-Modal Assessment was undertaken (detailed within 7.11 Transport Assessment - Appendix G - Multi-Modal Transport Report [APP-340]-) and developed to identify and assess opportunities which could make use of alternative transport modes to supply materials for the construction of the Project. The Transport Assessment [APP-340] details the sensitivity test which was undertaken from the potential Ports and Rail Sidings, based on maximum throughput of the alternative options, to understand if any additional junctions along the scheme needed to be mitigated. The delivery profile of materials onto Primary Access Routes did not change.</p> <p>The multi-modal assessment is considered appropriate and sufficiently covers the need to</p>	<p>Following the provision of additional evidence, National Highways has asked for clarification of the HGV routes taken from ports/railheads to the PARS, and for the peak hour impact of HGVs travelling from the ports and railheads to the construction sites on the wider SRN to be assessed. Also, the impact of rail and water transport on the construction vehicle trip distribution should be assessed. assessed the information and is content to agree the Multi-Modal Assessment.</p>	<p>Under discussion <u>Agreed</u></p>

ID	Matter	National Grid's Position	National Highways' Position	Status
		<p>consider transport impacts, as set out within the Overarching National Policy Statement (NPS) for Energy EN-1 (2023).</p> <p>National Grid will continue to engage with National Highways on this matter. <u>The Multi-Modal Assessment provided an indicative potential option for transporting aggregates from local ports and railheads. National Grid and their appointed Main Works Contractor (MWC) are currently re-assessing the multi-modal options available within the project, including existing available capacities at each of the ports and sidings. This will be incorporated into the updated construction vehicle volumes, which the MWC is developing. The worst case impact on the road network is not anticipated to change, as the assessment was completed on the maximum throughput per day from each port. The vehicle volumes would be expected to remain consistent or reduce through the updated investigation.</u></p>		
<p><u>5.1.156.1.15</u></p>	<p>Junction Capacity Assessment Methodology</p>	<p>Preliminary junction capacity assessments have been undertaken to establish whether there is a requirement to carry out a full assessment of the junctions with a traffic model as presented 7.11 Transport Assessment Chapter 6 – Methodology [APP-333]. This involved a preliminary assessment of the estimation of the volume to capacity (V/C)</p>	<p>National Highways considers that additional junctions <u>may</u> need to be assessed.</p>	<p>Under Discussion</p>

ID	Matter	National Grid's Position	National Highways' Position	Status
		<p>ratio that defines the performance threshold that classifies the operational status of each arm of the junction. If the junction V/C ratio is approaching capacity, at capacity or over capacity, a traffic model is required. The capacity assessment methodology used is considered appropriate.</p> <p><u>National Grid presented an early draft of the Transport Assessment (7.11 Transport Assessment [APP-333]) to the LHAs and National Highways at the Thematic Group Meeting in January 2025 and again ran through the methodology of junction sifting process, junction assessment methodology and cumulative assessment.</u></p> <p><u>The selection methodology and list of junctions deemed sensitive through the sifting process was provided for review by LHA and National Highways at the thematic group meeting held in April 2024, and feedback was used to refine the final selection. As a result of this engagement, several additional junctions were incorporated into the assessment scope, e.g. M25 J30 which does not connect to a Primary Access Route.</u></p> <p><u>National Grid set out in the meeting of 13th January 2026 its justification for why it does not consider necessary to model any additional junctions, except for the A12 J25, given the cancellation of the A12</u></p>		

ID	Matter	National Grid's Position	National Highways' Position	Status
		<p><u>Chelmsford to A120 Widening Scheme in Essex.</u> National Grid will continue to engage with National Highways on this matter. A meeting was held to discuss the trip generation and junction modelling with National Highways on 31st March. Following the meeting, National Grid has provided National Highways with further information for its review.</p>		
<p><u>5.1.166.1.16</u></p>	<p>Junction Modelling</p>	<p>The methodology used for undertaking junction assessments is presented in 7.11 Transport Assessment Chapter 6 – Methodology [APP-333]. The assessment methodology used is considered appropriate.</p> <p>National Grid will continue to engage with National Highways on this matter.</p>	<p>National Highways has reviewed the construction of the models and outstanding queries remain in respect of Galley's Corner, the Asda Roundabout, A14 J55, A12 J26, and M25 J30 and <u>Mark's Farm roundabouts</u>. National Highways needs to agree the trip generation, trip distribution and trip assignment across the network before the development trips used in the model can be agreed.</p>	<p>Under Discussion</p>
<p><u>5.1.176.1.17</u></p>	<p>Assessment of Walkers, Cyclist and Horse Riders (WCH)</p>	<p>The assessment of WCH impacts as a result of the Project is presented 7.11 Transport Assessment [APP-333]. The assessment methodology used is considered appropriate.</p> <p>A WCHAR has been prepared and will be submitted to National Highways for the following locations where changes to the Strategic Road Network are proposed:</p>	<p>National Highways understands the assessment of the Walkers, Cyclist and Horse Riders Network has been made on the basis of IEMA Guidelines, which is an accepted approach. National Highways requires a WCHAR report and GG104 Risk Assessment for any locations on the SRN where a change to the layout of the highway is</p>	<p>Under Discussion</p>

ID	Matter	National Grid's Position	National Highways' Position	Status
		<ul style="list-style-type: none"> A120/ Bentley Road A12 on slip at the A12 Ipswich Road/B1070 junction. <p><u>National Grid will issue the WCHARs to National Highways and will continue to liaise with National Highways to address any comments on these.</u></p> <ul style="list-style-type: none"> <u>GG104 risk assessments are being prepared by National Grid and these will be submitted to National Highways for review and acceptance.</u> 	<p>proposed <u>for a duration of at least six months.</u></p> <p><u>National Highways understands these documents are currently being prepared and will review them once they have been made available.</u></p>	
5.4.186.1.18	Impact on Parking	<p>The methodology for the assessment of impact to on-street parking is presented within 7.11 Transport Assessment Chapter 6 – Methodology [APP-333]. This includes a case-by-case assessment of temporary suspensions of formal and informal kerbside parking by the Project along PARs and Abnormal Load routes. This methodology is considered appropriate.</p>	<p>National Highways is content with the Applicant's approach.</p>	Agreed
5.4.196.1.19	Road Safety	<p><u>Within the Transport Assessment (7.11 Transport Assessment [APP-333]), collision analysis was undertaken for all junctions where the Strategic Road Network (SRN) connects to the Primary Access Routes.</u></p> <p>An assessment on Road Safety has been undertaken that thoroughly identifies the potential impact of the Project as set out in 7.11 Transport Assessment Chapter 4 – Existing Baseline</p>	<p>National Highways has requested a more in-depth review of collision clusters at SRN junctions. The collision assessment study area cannot be agreed until the full impacts on the SRN are understood. Any junctions expected to experience more than 30 development trips in a peak hour should be included. The collision analysis</p>	Under Discussion

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		<p>Transport Conditions [APP-333]. Collisions clusters have been identified along road links forming the PARs, based on existing baseline characteristics. A calculation of the accident rate per billion vehicle kilometres has been carried out on the road links forming the PARs to compare against the national statistics.</p> <p>Areas where potential road safety issues have been identified, as set out within 7.11 Transport Assessment, Chapter 7 – Transport Assessment [APP-333], will be highlighted within the Driver's pack as part of mitigation measures secured within 7.3 Outline Construction Management Plan [APP-309]. The assessment methodology used is considered appropriate.</p> <p>National Grid will continue to engage with National Highways on this matter. A review of collision data over a five-year period excluding COVID-19 period has been undertaken. An addendum to 7.11 Transport Assessment [APP-333] is to be submitted during examination at Deadline 4 which will present the findings of the updated collision analysis. In addition, the addendum will include a summary of all baseline data used within all additional modelling undertaken at SRN junctions and the findings of further assessment. The Applicant will continue to engage with National</p>	<p>should cover a five year (60 month) excluding data gathered between March 2020 and September 2021.</p> <p><u>National Highways welcomes the submission of additional information on this matter, will review the information when it becomes available and provide an updated position.</u></p>	

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<u>Highways.</u>				
Transport Assessment – Mitigation Measures				
<u>5.1.206.1.20</u>	Mitigation Measures	<p>Mitigation measures include embedded, standard and additional mitigation identified within 7.11 Transport Assessment Chapter 2 – Project Description [APP-333], and as reported within 16.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271], 7.2 Outline Code of Construction Practice [APP-300] and 7.3 Outline Construction Management Plan [APP-309]. This includes additional mitigation at junctions and specific areas to help reduce the impact on capacity and provide environmental mitigation measures to reduce the significance of effects of the Project. The measures presented are considered appropriate.</p> <p>National Grid will continue to engage with National Highways on this matter.</p>	National Highways position is subject to the completion of the modelling assessment to understand the impacts of the development on the SRN during construction and mitigation measures that are required.	Under Discussion
Transport Assessment – Baseline Conditions				
<u>5.1.216.1.21</u>	Baseline Conditions	<p>The baseline conditions and sensitive receptors for Traffic and Transport are presented in 7.11 Transport Assessment Chapter 4 – Existing Baseline Transport Conditions [APP-333], and are considered appropriate.</p> <p>National Grid will continue to engage with National Highways on this matter.</p>	National Highways position is subject to review of the final versions of the ES and TA.	Under Discussion

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Transport Assessment – Future Baseline Conditions				
5.1.226.1.22	Growth Factors	The future baseline traffic on the SRN / MRN has been estimated applying appropriate growth factors derived from TEMPro NTEM dataset v7.2 and are presented in 7.11 Transport Assessment Chapter 5 – Future Baseline [APP-333] . Growth factors have been applied for the peak year of activity and therefore vary along PARs. This approach and the growth rate used is considered appropriate.	National Highways agrees that the approach is appropriate and considers the use of TEMPro NTEM dataset v7.2 as acceptable for forecasting future growth in the assessment years.	Agreed
5.1.236.1.23	Cumulative Developments	<p>The committed developments included within the cumulative assessment for the future baseline year are presented in 7.11 Transport Assessment Chapter 5 – Future Baseline [APP-333]. These have been derived through a review of local authority planning portals and information received from LPAs and identifying those developments that overlap with the peak year activity for each PAR. The developments included within the assessment are considered appropriate.</p> <p><u>National Grid has engaged with the Local Highway Authorities and National Highways throughout the Development Consent Order process. As part of this engagement, National Grid requested a review of those committed developments initially identified for assessment and requested details of any additional developments that may impact the Project.</u></p>	<p>National Highways has queried the omission of Bathside Bay, <u>notes that no traffic flow information was available for</u> Tendring/ Colchester Borders Garden Community, and Norfolk Vanguard and Boreas Windfarms from the assessment. Confirmation from the relevant LPAs that all committed development has been included in the assessment. National Highways has also requested the turning movement at each SRN junction associated with each committed development. <u>at the cut-off stage. This is considered to be a reasonable justification for the exclusion of TCBGC from the list of committed developments.</u> National Highways considers that the traffic associated with</p>	Under-Discussion Agreed

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		<p><u>The developments identified by National Highways were not provided to National Grid as needing to be reviewed as part of the cumulative assessment and are located a notable distance from the PARs. However, a review has been undertaken, and it was found that the Tendring Colchester Borders Garden Community had no formal planning application submitted for any phase of this development at the cut-off stage (1 April 2025). The development would have been excluded from the Project assessment as no traffic flows were publicly available.</u></p> <p><u>The construction of the Bathside Bay Container Terminal (BBCT) was anticipated to start in 2024 with Green Energy Hub operation commencing in 2026 (at the earliest). The application for BBCT's Environmental Statement (ES) outlines that 'Due to the A120 being a large A-road with little interaction with local sensitive receptors, the impacts of severance, amenity and highway geometry are considered to be not significant and are scoped out of this assessment'. Furthermore, the ES states regarding highways safety that the impacts on highway safety are negligible, i.e. the low magnitude flows are unlikely to lead to cumulative effects. Therefore, this development would have been excluded from the Project assessment due to traffic flows being not significant.</u></p>	<p><u>Bathside Bay will have been included within the background traffic growth to an extent and, therefore, in this instance, National Highways agree with the exclusion from this assessment of Bathside Bay as a committed development. Norfolk Vanguard Wind Farm and Norfolk Boreas Wind Farm have been excluded as the construction period for these developments does not overlap with the period of peak construction for the Norwich to Tilbury development. National Highways notes that flows associated with these developments will be included within background traffic growth calculations to an extent and a significant proportion of these wind farm developments will be complete at the time of the Norwich to Tilbury construction.</u></p>	

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<p>National Grid will continue to engage with National Highways on this matter. The Heavy Goods Vehicle construction routes for both the Norfolk Vanguard and Boreas Wind Farms projects overlap with the Strategic Road Network used by the Project, most notably for the multi-modal assessment. The construction of the Norfolk Vanguard project started in 2023 and is expected to be completed by 2028 prior to the Project's peak construction. For the Boreas Wind Farms Project, the indicative Construction Programme indicates construction would end by 2027. These developments would therefore be excluded from the Project's cumulative assessment as daily movements, where overlapping, would not be significant.</p>				
<p>Transport Assessment – Construction Trip Generation</p>				
<p><u>5.1.246.1.24</u></p>	<p>Key Assumptions</p>	<p>Key assumptions associated with the Traffic and Transport assessment are summarised in 16.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271] and Section 6.2 of Chapter 6 of the 7.11 Transport Assessment [APP-333]. The key assumptions presented are considered appropriate.</p> <p>National Grid will continue to engage A meeting was held with National Highways regarding the required on 31st March 2026 where the trip generation methodology, assumptions and</p>	<p>National Highways has requested further information respect of the assumptions related to the trip generation received additional information, and this is currently being reviewed. National Highways will aim to provide an update at <u>Deadline 5</u>.</p>	<p>Under Discussion</p>

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5.1.256.1.25	Methodology	<p>The methodology for assessing the technical information received from the technical teams and generating the trip estimate is found within 7.11 Transport Assessment Chapter 6 – Methodology [APP-333] is considered suitable and robust. National Grid will continue to engage with National Highways regarding the required information. A meeting was held with National Highways on 31st March 2026 where the trip generation methodology, assumptions and assignment was presented and discussed. National Highways are reviewing the information provided.</p>	<p>National Highways has requested further information in respect of the methodology related to the trip generation <u>received additional information, and this is currently being reviewed. National Highways will aim to provide an update at Deadline 5.</u></p>	Under Discussion
5.1.266.1.26	Construction Vehicle Trips	<p>Trip generation estimation has been undertaken to evaluate the daily traffic levels associated with construction activities for both the OHL and cables and substations. The estimation is based on a worst-case scenario, identifying peak-day vehicle movements for each construction activity to ensure a robust and conservative impact. This is presented in 7.11 Transport Assessment Chapter 6 – Methodology [APP-333]. The trip generation is considered appropriate.</p> <p>National Grid will continue to engage with National Highways regarding the required information. A meeting was held on 31st March 2026</p>	<p>National Highways has requested further information relating to SRN junctions and a more detailed hourly breakdown <u>received additional information, and this is currently being reviewed. National Highways will aim to provide an update at Deadline 5.</u></p>	Under Discussion

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		<p><u>with National Highways to discuss the trip generation and assignment. Following the meeting, National Grid has provided National Highways with further information for its review.</u></p>		
<p><u>5.1.276.1.27</u></p>	<p>Construction Workforce Trips</p>	<p><u>The target occupancy rate of 1.3 was taken as best practice for the minimum target and is based on the Bramford to Twinstead Development Consent Order Construction Traffic Management Plan [EN020002].</u></p> <p>Overhead Line, cabling and substation workforce trips have been estimated based on shared occupancy as presented in within 7.11 Transport Assessment Chapter 6 – Methodology [APP-333].</p> <p>7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311] has been prepared as part of the DCO application. This will be developed into a final detailed CWTP by the Main Works Contractor(s) following the submission of the DCO application. The workforce trip generation is considered appropriate.</p> <p>National Grid will continue to engage with National Highways regarding the required information. <u>Section 6.4 of the Transport Assessment (7.11 Transport Assessment [APP-333]) provides an overview of the</u></p>	<p><u>National Grid has provided clarification on the vehicle occupancy rate of 1.3 which National Highways has requested clarification of the 1.3 person per vehicle factor, reviewed and considered acceptable.</u></p>	<p>Under Discussion <u>Agreed</u></p>

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		<u>construction staff occupancy assessments. The office-based staff uses a vehicle occupancy of one as a worst case, as less information about their movement patterns are known. The Overhead Line and Cables and Substation workers are assumed to stay in similar hotels, and hence a vehicle occupancy of two has been used, with an inherited level of car sharing assumed. Information was made available from the technical teams that confirmed they would sign in at a main site before travelling to their working location, with this travel being completed in crew vans.</u>		
Transport Assessment – Conclusions				
<u>5.1.286.1.28</u>	Overall Impact of the Project	The conclusions of the Transport Assessment are presented within 7.11 Transport Assessment Chapter 8 – Conclusion [APP-333] . The conclusions are considered appropriate. National Grid will continue to engage with National Highways on this matter. <u>See ID 6.1.12 to 6.1.27 for Transport Assessment matters.</u>	The conclusions cannot be agreed until all the issues raised above are closed out.	Under Discussion
Outline Construction Transport Management Plan (CTMP)				
<u>5.1.296.1.29</u>	Project Team Roles and Responsibilities	The Project Teams Roles and Responsibilities are set out in 7.3 Outline Construction Traffic Management Plan [APP-309] . These are considered clear and sufficient for the delivery of	National Highways agree with National Grid's position set out within Section 3 of the Outline Construction Transport Management Plan.	Agreed

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		the Project.		
5.1.306.1.30	Pre and Post Construction Surveys	<p>Details of the proposed Pre and Post Construction surveys are set out in 7.3 Outline Construction Traffic Management Plan [APP-309] and connect to the mitigation measures detailed within 7.2 Outline Code of Construction Practice [APP-300].</p> <p>These pre- and post-construction surveys are appropriate for the Project.</p>	National Highways agree with National Grid's position set out within Section 5.2 of the Outline Construction Transport Management Plan. National Highways request pre- and post- construction surveys on areas of the SRN highly trafficked for ALL movements, such as the A120 / Bentley Road access to the EACN and site access points such as the temporary access from the A120 west of Marks Tay.	Agreed
5.1.316.1.31	Traffic Management Measures	<p>Details of the proposed traffic management measures are set out in 7.3 Outline Construction Traffic Management Plan [APP-309]. These traffic management measures are appropriate and adequate in terms of nature and scale to address potential construction impacts.-</p>	National Highways agree in principle with National Grid's position set out within Section 5.8 of the Outline Construction Transport Management Plan regarding Traffic Management. Where traffic Management is necessary on the SRN, a Roadspace Booking is required. This can be made via the Roadspace booking team on EastRegionRoadspace@nationalhighways.co.uk	Agreed
5.1.326.1.32	Implementation/ Enforcement	<p>The implementation and enforcement process is set out in 7.3 Outline Construction Traffic Management Plan [APP-309]. This process is appropriate and adequate for the Project.</p>	National Highways considers the enforcement reasons identified for non-compliance of the CTMP to be comprehensive. However, it is unknown	Under Discussion

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		<p><u>A number of matters have been defined as non-compliance to ensure that the CTMP is effectively enforced within Section 6.4 of 7.3 Outline Construction Traffic Management Plan [APP-309]. All incidents associated with the construction of the Project, including non-conformance with the CTMP, will be reported by the Environmental Clerk of Works and Transport Coordinators. Where a breach or complaint is reported, the Main Works Contractor(s) and/or National Grid will carry out an investigation in order to identify appropriate corrective actions. Where needed, corrective actions will be agreed with the relevant LHA or National Highways, and/or community members prior to implementation. Where a corrective action is identified, the LHA or National Highways will be informed. Data recorded from the non-compliance procedure will be collated on a quarterly basis and will be issued out to the relevant parties, including LHAs and National Highways.</u></p> <p>National Grid will continue to engage with National Highways on this matter. <u>The Main Works Contractor will be responsible for developing the Detailed CTMP and its control measures, which will be done in agreement with National Highways as detailed in Sections 1.7 and 6.8 of 7.3 Outline</u></p>	<p>what measures would be taken for persistent enforcement breaches. National Highways wishes to agree the controls that are included within the CTMP.</p>	

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<u>Construction Management Plan [APP-309]</u>				
Outline Construction Worker Travel Plan (OCWTP)				
<u>5.1.33</u> <u>6.1.33</u>	Policy	The policy context, including legislation and guidance considered in the development of the document is set out in 7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311] . All relevant legislation, policy, and guidance have been identified and appropriately considered to inform the OCWTP .	National Highways agrees with National Grid's position set out within the Outline Construction Worker Travel Plan section 4.	Agreed
<u>5.1.34</u> <u>6.1.34</u>	Site Accessibility Review	The Site Accessibility review is captured within 7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311] . This review is appropriate for the Project.	National Highways agrees with National Grid's position regarding site accessibility.	Agreed
<u>5.1.35</u> <u>6.1.35</u>	Targets, Strategy, and Measures	Targets, Strategy and Measures are set out within 7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311] . The construction targets set out are relevant and achievable, given the present stage of Project development. The strategy and measures proposed to be implemented are suitable and appropriate for managing the anticipated construction staff travel impacts arising from the Project. National Grid will continue to engage with	National Highways agrees in principle with National Grid's position set out within the Outline Construction Worker Travel Plan. The strategies and measures set out in Section 8 are considered acceptable for the proposed development. National Highways requires clarification of the 1.3 per person per car minimum occupancy is <u>content that the explanation provided for the vehicle occupancy ration of 1.3 is</u>	Under Discussion <u>Agreed</u>

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		<p>National Highways regarding the required information.</p> <p><u>See ID 6.1.27 for discussion on 1.3 person per vehicle target.</u></p>	<p><u>acceptable.</u></p>	
<p>5.1.366. <u>1.36</u></p>	<p>Monitoring and Review</p>	<p><u>A number of matters have been defined as non-compliance to ensure that the CWTP is effectively enforced within Section 8 of 7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311]. The TPC will be responsible for undertaking site inspections to check compliance with the CTMP. All incidents associated with the construction of the project, including environmental incidents and non-conformance with the CWTP, will be reported and investigated. Where the Main Works Contractor(s), suppliers or sub-contractors are not delivering the requirements, National Grid will review performance and conduct further training and issue formal warnings as appropriate.</u></p> <p>The proposed monitoring and review <u>Main Works Contractor will be responsible for developing the Detailed CWTP and its control measures, which will be developed through consultation with the relevant LHA and National Highways. Any future changes will follow the change process is set out in Section 8.4 of 7.3 Outline Construction Traffic</u></p>	<p>The monitoring and review processes set out in Section 9 are considered acceptable for the proposed development, subject to the 1.3 person per vehicle target being agreed. National Highways requests to be consulted when reviewing monitoring results, for areas that impact the SRN, such as the EACN. National Highways wishes to agree the controls that are included within the CWTP.</p>	<p>Under Discussion</p>

ID	Matter	National Grid's Position	National Highways' Position	Status
		<p>Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311]. This is suitable and appropriate, given the present stage of Project development.</p> <p>National Grid will continue to engage with National Highways on this matter. See ID 6.1.27 for discussion on 1.3 person per vehicle target.</p>		
Construction Access Strategy and Design				
5.1.376.1.37	Construction Access Approach	<p>The approach for construction access for the Project is proposed to utilise designated routes for construction traffic on local roads. These are defined as 'Primary Access Routes' (PARs) within 7.3 Outline Construction Traffic Management Plan [APP-309]. This approach is suitable for construction traffic for the Project.</p>	National Highways consider the approach taken for selecting Primary Access Routes to be acceptable.	Accepted
5.1.386.1.38	Primary Access Route Selection	<p>Routes on local roads proposed to be utilised as Primary Access Routes (PARs) are shown in the 7.3 Outline Construction Management Plan – Appendix C – Indicative Highway Mitigation Plans [APP-312, APP-313, APP-314, APP-315, APP-316, APP-317, APP-318, APP-319]. These have been discussed with National Highways during regular engagement meetings since September 2023. These PARs and their proposed interactions with the Strategic Road Network (SRN) are suitable for use by the proposed construction traffic, considering the proposed</p>	National Highways consider the approach taken for selecting Primary Access Routes to be acceptable.	Accepted

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		mitigation measures detailed within the 7.3 Outline Construction Traffic Management Plan [APP-309] .		
5.1.396.1.39	Construction Access from National Highways Infrastructure	<p>The proposed site access locations ('Access Bellmouths') and locations where construction traffic is proposed to cross the Public Highway ('Crossover Bellmouths') are set out in 7.3 Outline Construction Traffic Management Plan [APP-309].</p> <p>Construction access is proposed to be taken directly from the Strategic Road Network in one location, from the A120 between Coggeshall and Marks Tey. This location is denoted as 'TB-B059' in the Project documentation.</p> <p>The requirement for the construction access in this location has been discussed with National Highways, and is considered suitable in principle, in line with Department for Transport (DfT) Circular 01/2022. A technical note setting out this rationale was shared with National Highways in September 2024 and accepted in principle in October 2024.</p> <p>The design of the proposed access in this location has been prepared based on the Design Manual for Roads and Bridges CD123, and Stage 1 Road Safety Audits (RSAs) have been undertaken for this proposed location, overseen by National Highways.</p> <p>This location is considered to be suitable in</p>	<p>The principle of the access Bellmouth from the A120 between Coggeshall and Marks Tey is acceptable subject to completion of the Road Safety Audit stage 1 process and GG104 Risk Assessment.</p>	Under Discussion

ID	Matter	National Grid's Position	National Highways' Position	Status
		<p>principle, and remaining comments arising from the Stage 1 RSA will be addressed in consultation with <u>The RSA report and designer's response have been issued to National Highways for review and acceptance.</u></p> <p><u>GG104 risk assessments are being prepared by National Grid</u> will continue to engage with <u>and these will be submitted to National Highways</u> on this matter <u>for review and acceptance.</u></p>		
<p><u>5.1.406.1.40</u></p>	<p>Proposed Mitigations Impacting National Highways Infrastructure</p>	<p>Mitigation measures proposed on the Public Highway are described in 7.3 Outline Construction Traffic Management Plan [APP-309], and are further set out in the following Schedules [APP-056]:</p> <ul style="list-style-type: none"> ● Schedule 6, Part 1 - Streets Subject to Permanent Alteration of Layout. ● Schedule 6, Part 2 - Streets Subject to Temporary Alteration of Layout. <p>Of these, two locations have been identified impacting the Strategic Road Network:</p> <ul style="list-style-type: none"> ● Permanent modification of the A12(N)/B1070 merge slip, near Holton St Mary in Suffolk. ● Permanent modification of the A120(E)/Bentley Road merge slip near Little Bentley, Essex. <p>These designs were discussed with National Highways during an engagement session in April-</p>	<p>The principle of the proposed mitigation at three locations on the SRN (including Copdock) is acceptable subject to completion of the Road Safety Audit stage 1 process and GG104 Risk Assessment. Preliminary Design drawings for both locations have yet to be provided therefore National Highways will need to complete a compliance check with DMRB standards.</p> <p>National Highways cannot yet be certain that mitigation at other locations is not required until the junction modelling assessments are complete.</p>	<p>Under Discussion</p>

ID	Matter	National Grid's Position	National Highways' Position	Status
		<p>2025, and further to this Stage 1 Road Safety Audits have been undertaken for each location, overseen by National Highways. These locations are suitable in principle, and remaining comments arising from the Stage 1 RSAs will be addressed in consultation with National Highways as the Overseeing Authority.</p> <p><u>Preliminary designs at these locations have been developed to DMRB standards. Stage 1 Road Safety Audits of these designs have been undertaken for each location, and this process including review of the designs and RSA briefs has been overseen by National Highways. The RSA report and designers response has been issued to National Highways for review and acceptance.</u></p> <p><u>GG104 risk assessments are being prepared by National Grid</u> will continue to engage with <u>and these will be submitted to National Highways</u> on this matter <u>for review and acceptance.</u></p>		
6.1.40a	<u>Highway mitigation – Copdock Roundabout</u>	<u>As a result of the junction modelling, additional mitigation has been identified at the Copdock Roundabout. The preliminary design of this mitigation is being prepared by the Main Works Contractor. A Stage 1 Road Safety Audit will be undertaken on this and overseen by National Highways.</u>	<u>National Highways requires a RSA1 and GG 104 assessment to be undertaken for the proposed the lane marking alterations at the A14 J55 Copdock Interchange.</u>	<u>Under Discussion</u>
5.1.416.	Traffic	Traffic Management measures proposed on the	The measures proposed need to be	Under

ID	Matter	National Grid's Position	National Highways' Position	Status
1.41	Management	<p>Public Highway are described in 7.3 Outline Construction Traffic Management Plan [APP-309] and further set out in Schedule 5 - Streets Subject to Streetworks of the Draft Development Consent Order [APP-056]. These are suitable and sufficient for the delivery of the Project.</p> <p>Approaches to Traffic Management were discussed in principle during engagement sessions in June 2024, and further specific measures relating to highway mitigation design were discussed during engagement sessions in April 2025.</p> <p>National Grid will continue to engage with National Highways as the proposed Traffic Management measures are developed further, including through the Road Safety Audit process where these relate to proposed site access design (ID 5.1.426.1.42), and highway mitigation design (ID 5.1.436.1.43).</p> <p>Corrective actions to address any non-compliances will be agreed with National Highways where these relate to the SRN.</p>	<p>discussed and agreed with NH. It is noted that interventions to address any non-compliances will be agreed with the Local Highways Authority. Please can the Applicant confirm that this is intended to include National Highways <u>is content to agree the traffic management proposals in the oCTMP in principle, subject to further discussion and agreement on the detailed proposals before the CTMP is finalised.</u></p>	Discussion Agreed
5.1.426.1.42	Traffic Regulation Orders and Temporary Traffic Regulation Orders	<p>Proposed Traffic Regulation Orders (TROs) and Temporary Traffic Regulation Orders (TTROs) are shown in the Traffic Regulation Order Plan (document reference 2.4) [APP-025 to APP-032 inclusive], and set out in Schedule 13 of the draft</p>	<p>National Highways considers this is not yet agreed and requires further discussions' <u>Protective Provisions would provide sufficient safeguarding in this regard.</u></p>	Under Discussion

ID	Matter	National Grid's Position	National Highways' Position	Status
		<p>DCO (document reference 3.1) [APP-056]:</p> <ul style="list-style-type: none"> • Part 1: Temporary restriction of waiting and restriction of speed • Part 2: Temporary restriction of access and restriction of movement • Part 3: Temporary no overtaking order • Part 4: Permanent restriction of waiting and restriction of speed. <p>These are suitable and sufficient for the delivery of the Project.</p> <p>National Grid will continue to engage with National Highways as the proposed TROs and TTROs are developed further, including through the Road Safety Audit process where these relate to proposed site access design (ID 5.1.42), and highway mitigation design (ID 5.1.43).</p> <p><u>The TROs proposed are necessary to enable the safe construction of the Project, and safe operation at permanent road features. The activities where TROs are required on the SRN include:</u></p> <ul style="list-style-type: none"> • <u>Highway mitigation works</u> • <u>Site access points</u> • <u>Netting activities to enable overhead line stringing</u> • <u>AIL routing constraint sites.</u> 		

ID	Matter	National Grid's Position	National Highways' Position	Status
		<p><u>The works programme is yet to be finalised, so the durations of all TROs are unable to be confirmed at this time.</u></p> <p><u>The proposed TROs listed in Schedule 13 of 3.1 Draft Development Consent Order [APP-056] are intended to be worst-case scenarios, and the Main Works Contractor may elect to reduce the number, type or extent of them.</u></p> <p>National Grid will continue to engage with National Highways on this matter.</p>		
Abnormal Indivisible Load (AIL) Access				
<p><u>5.1.436.</u> <u>1.43</u></p>	<p>Abnormal Indivisible Load (AIL) Access Approach</p>	<p>The approach for Abnormal Indivisible Load (AIL) access to the project is to utilise designated routes on the local and Strategic Road networks. This approach is set out within 7.3 Outline Construction Traffic Management Plan [APP-309], and further detailed within the 7.3 Outline Construction Traffic Management Plan – Appendix A - AIL Access Strategy [APP-310]. A draft version of the AIL Access Strategy was shared with National Highways in March 2025.</p> <p>This approach, in principle, is suitable for AIL access for the Project at the current stage of project development.</p>	<p>National Highways considers this to be agreed.</p>	<p>Agreed</p>
<p><u>5.1.446.</u> <u>1.44</u></p>	<p>Abnormal Indivisible Load</p>	<p>Routes proposed to be utilised by Abnormal Indivisible Loads (AILs) are shown in 7.3 Outline</p>	<p>National Highways considers this to be agreed.</p>	<p>Agreed</p>

ID	Matter	National Grid's Position	National Highways' Position	Status
	(AIL) Access Routes	<p>Construction Traffic Management Plan – Appendix A - AIL Access Strategy [APP-310].</p> <p>These have been developed following consultations with National Highways. As part of these consultations, draft route information was shared in July 2024 and April 2025.</p> <p>These routes are considered to be feasible, and reasonable for the current stage of project development.</p>		
<p>5.1.456.1.45</p>	<p>Abnormal Indivisible Load (AIL) Structural Investigations</p>	<p>Routes proposed to be utilised by Abnormal Indivisible Loads (AILs) are shown in 7.3 Outline Construction Traffic Management Plan – Appendix A - AIL Access Strategy [APP-310].</p> <p>National Grid have been consulting with National Highways in relation to structures on the sections of the Local Road Network impacted by these proposed routes. As part of these consultations, draft route information was shared in July 2024 and April 2025, and information around impacted structures requested. Specific concerns raised by National Highways in relation to structures on the draft routes shared have been considered in the development of the proposals shown in 7.3 Outline Construction Traffic Management Plan – Appendix A - AIL Access Strategy [APP-310].</p> <p>Engagement with respect to impacted structures is</p>	<p>National Highways considers this to be agreed.</p>	<p>Agreed</p>

ID	Matter	National Grid's Position	National Highways' Position	Status
		<p>anticipated to be ongoing in parallel with the Development Consent Order process. It is understood that any Approvals in Principle secured at the current stage of project development do not supersede requirements for formal application ahead of any AIL movements undertaken by the Project. The relevant process is set out in 7.3 Outline Construction Traffic Management Plan – Appendix A - AIL Access Strategy [APP-310].</p> <p>The AIL application submitted prior to vehicle movements made by the Main Works Contractor will address structures affected, street furniture and any third-party land impacts as well as programming and operational arrangement to accommodate the movements with minimal impact on the network.</p>		
<p>5.1.466. <u>1.46</u></p>	<p>Abnormal Indivisible Load (AIL) Mitigation and Management Measures</p>	<p>The locations of proposed mitigation measures associated with proposed AIL Routes are shown in the Construction Access Plans within 7.3 Construction Traffic Management Plan – Appendix C – Indicative Highway Mitigation Plans [APP-312 to APP-320 inclusive]. These mitigation measures have been developed consistently with the wider Highway Mitigation approach for the Project (ID 5.1.436.1.43) and are suitable and sufficient for the delivery of the Project.</p>	<p>No mitigation measures are currently required on the SRN for AILs <u>however, Structural Assessments may be required when the applicant submits the ESDAL application. In some locations, mitigation measures may be required to ensure the route is suitable for the intended loads.</u></p>	<p>Agreed</p>

ID	Matter	National Grid's Position	National Highways' Position	Status
		Management measures relevant to AIL movements are discussed within Section 5.3 of the CTMP , and Section 6 of the AIL Access Strategy (Appendix A of the CTMP) . This approach, in principle, is suitable for AIL access for the Project at the current stage of project development.		
<u>5.1.476.1.47</u>	Protective provisions	Proposed provisions for the protection of National Highways are set out in Part 5 of Schedule 16 of 3.1 Draft Development Consent Order [APP-056]; National Grid will continue to engage with National Highways on this matter. <u>Whilst National Highways' proposed Protective Provisions provided at Appendix 1 of its Relevant Representations are not agreed at this stage, National Grid will continue to liaise with National Highways to seek to fully agree a set of Protective Provisions that addresses all of National Highways' concerns.</u>	National Highways does not consider that the proposed protective provisions included within the draft DCO provide adequate protection in respect of the safe operation of the SRN. National Highways has provided its standard form of protective provisions as part of its Relevant Representation and wishes <u>and continues</u> to discuss these with the Applicant.	Under Discussion
<u>5.1.486.1.48</u>	Compulsory Acquisition of land and property	<u>The Applicant held a meeting with National Highways in February 2026 regarding this matter. The Applicant and National Highways have mutually agreed to meet again to undertake a detailed assessment of all of National Highways land interests, and the rights sought by the Applicant.</u> The 4.3 Book of Reference [APP-064] contains	National Highways objects to the compulsory acquisition of operational land to ensure that the safe and efficient operation of the SRN can be maintained by NH. Some of the plots pertain to operational Highway and compulsory acquisition of such land is unacceptable and would prevent NH from discharging its statutory duties.	Under Discussion

ID	Matter	National Grid's Position	National Highways' Position	Status
		<p>154 plots of land interests owned or occupied by National Highways for the purposes of its undertakings.</p> <p>National Grid will continue to engage, on a plot by plot basis, with National Highways regarding its land interests to enable National Highways to carry out its statutory duties notwithstanding the compulsory acquisition of any land/rights by National Grid.</p> <p>National Grid will continue to engage with National Highways on this matter. <u>The Applicant is confident that the outstanding discussions will be taken forward to find a mutually agreeable approach regarding legal agreements to protect National Highways and its ability to ensure safe and efficient operation of the SRN will be agreed and implemented.</u></p>	<p>The land information provided in the Book of Reference is in a format which makes it extremely and disproportionately onerous for NH to check the ownership status of each land parcel, given the large number of plots involved. We received the information in the appropriate format on 10 February, which will enable us to identify accurately the status of each parcel of National Highways land. We will then be able to engage with the Applicant on the implications of their land requirements and discuss appropriate mechanisms to enable access/transfer of ownership, if acceptable. <u>National Highways has reviewed all plots contained with the Book of Reference and is in discussion with Applicant about alternative approaches of enabling access to National Highways owned land to enable construction of the project.</u></p>	
<p><u>5.1.496.1.49</u></p>	<p>Overhead Lines</p>	<p>The route of the Electricity Transmission cable is proposed to cross the NH Strategic Road Network (SRN) in four locations:</p> <ul style="list-style-type: none"> • A14 – between Creting St Peter and Creting St Mary 	<p>A Section 169 Agreement with an Approval in Principle by National Highways is required for the sections of overhead lines crossing over the top of the SRN.</p>	<p>Under Discussion</p>

ID	Matter	National Grid's Position	National Highways' Position	Status
		<ul style="list-style-type: none"> • A12 – North of J29 • A120 – between Coggeshall and Marks Tey • A12 – South of J14 <p>National Grid notes National Highways' requirements and will engage with National Highways as part of the preparation of Section 169 Agreements and Approvals in Principle for the proposed overhead line crossings of the SRN.</p>		
<p>5.1.506.1.50</p>	<p>Underground crossings</p>	<p>Along the route of the Electricity Transmission cable, there is one underground crossing proposed to cross the (SRN) A12, north of Langham.</p> <p>National GridThe Applicant notes National Highways' requirements set out in its Relevant Representation and will engage/continue to liaise with National Highways, as part of the preparation of an Approval in Principle for the proposed, in relation to the technical detail of the underground crossing of the A12Strategic Road Network.</p>	<p>For the section of underground cabling crossing the A12 an Approval in Principle by National Highways is required.</p> <ul style="list-style-type: none"> • NH only permits Trenchless Crossing techniques on the SRN, with Horizontal Directional Drilling the preferred method. • NH are unable to determine the geotechnical risks on the A12. Any proposed directional drilling under the SRN will require compliance with The Design Manual for Roads and Bridges (DMRB) Chapter CD622 (Managing Geotechnical Risk). • NH advises the Applicant to review the requirements of CD622, which can be found on the Standards for 	<p>Under Discussion</p>

ID	Matter	National Grid's Position	National Highways' Position	Status
			<p>Highways website. Consideration should also be given to the potential impact of drilling upon other SRN assets, such as drainage, with evidence provided for NH's review. Additional asset impact may require further approval processes. NH's standard protective provisions (as appended in Appendix 1) secure these approvals and requirements.</p> <ul style="list-style-type: none">• All cable works will require monitoring and assurance, with safety risks assessed for monitoring, and survey works within the proximity of the A12 live carriageway.	

7. ~~6.~~ Signatures

This Statement of Common Ground is agreed upon by the undersigned parties:

For National Grid

Name: _____

Position: _____

Date: _____

For National Highways

Name: _____

Position: _____

Date: _____

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Modified filename: 5.9.20 Draft Statement of Common Ground - National Highways Revision C Clean Version.docx	
Changes:	
<u>Add</u>	193
Delete	162
Move From	0
<u>Move To</u>	0
<u>Table Insert</u>	3
Table Delete	0
<u>Table moves to</u>	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	358