

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

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

- **ISSUE SPECIFIC HEARING 2 (28 April 2026)**
- **COMPULSORY ACQUISITION HEARING 2 (30 April 2026)**

1 Introduction

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

- 1.1.1 the Issue Specific Hearing held on 28 April 2026; and
- 1.1.2 the Compulsory Acquisition Hearing held on 30 April 2026.

1.2 The LTC Project was consented in March 2025 and is currently in its delivery phase. As previously raised in its relevant representation [RR-2215], its written representation [REP1-250] and submissions made during Issue Specific Hearing 1 and Compulsory Acquisition Hearing 1 [REP1-249] there is significant overlap between the Applicant's project and the LTC DCO.

2 Summary of representations made at Issue Specific Hearing 2

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

Agenda item 6: The DCO

2.2 The LTC Project team confirmed that the concerns raised in earlier examination submissions remain. In particular, one of LTC's primary concerns relates to the need to address the siting of the replacement compensatory habitats necessitated by the Applicant's Tilbury substation location and associated works.

2.3 The siting of the Tilbury substation location removes a site that was carefully chosen for the provision of compensatory habitat for LTC's nitrogen deposition effects. Other LTC compensatory habitats for LTC's nitrogen deposition and ancient woodland loss are also affected by works in this locality.

2.4 The LTC Project team therefore envisages that amendments will be needed to the NTT DCO. Firstly to articulate clearly how the LTC Project would be permitted to take on any replacement sites that are to be alternatives to those secured under the LTC DCO, and secondly to address the issue of the breach of the LTC DCO which would occur if the LTC Project is unable to deliver the mitigation sites required by the LTC DCO.

2.5 The LTC Project team has shared suggested drafting with the Applicant to address these issues and discussions on this topic are ongoing. However, greater clarity is required from the Applicant about the locations of the alternative habitat sites in order to identify the appropriate DCO drafting – this is a matter which requires resolution as a priority. A meeting is being set up to seek to address this matter. **[Post hearing update: an initial meeting took place on 6 May 2026.]**

2.6 The LTC Project team confirmed that it would be happy to share the proposed drafting with the Examining Authority at an appropriate time.

Post hearing note:

2.7 The LTC is concerned by the location of an alternative compensation area put forward by the Applicant as it is sited on one of LTC's main construction compounds. This means that planned early establishment of woodland is not possible on that site and establishment will have to await demobilisation of that compound. A further concern is that the alternative site is smaller than assumed by the Applicant, due to LTC's refinement to the routing of Brentwood Road [see LTC's deadline 3 submission [REP3-125].

3 Summary of representations made at Compulsory Acquisition Hearing 2

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

Agenda item 3: Individual site specific representations

3.2 The LTC Project team started by setting out that its primary concern is the significant spatial interactions between the projects, in terms of the locations of LTC's consented works and the proposed works of NTT, and the associated land requirements. The LTC Project team are also concerned about the significant temporal interactions between the projects in terms of the respective construction programmes and methodologies, which would mean that the same plots of land might be needed by both LTC and NGET at the same time for different or the same purposes. There are also particular concerns about how the proposed compulsory acquisition powers would impact upon the LTC team's ability to deliver on the environmental and community commitments and obligations in the LTC DCO.

3.3 The LTC Project team reminded the Examining Authority that at compulsory acquisition 1, it had stated that it would need to carry out a further analysis of the interaction between the land plots in order to fully understand the interactions and identify suitable solutions.

3.4 In order to do this, the LTC Project Team has been waiting for the Applicant to provide sufficient detail, for example land plan overlays showing Option B only. Unfortunately, this detail has not yet been made available to the LTC Project Team and therefore the LTC cannot fully crystallise what the issues are, and its concerns therefore remain unchanged.

3.5 On the assumption that sufficient detail can be provided to the LTC Project team, it is envisaged that the interface between the two projects will be managed through a side agreement. However, more detail is needed before this can be agreed.

Post Hearing Note:

3.6 At the hearing, the Applicant stated that they had shared a draft of the GIS layers that underpin the plans that they are to provide at Deadline 4 with the LTC Project team. The LTC Project team confirms that it received these GIS layers on 27 April 2026.

3.7 The LTC Project team has now reviewed these layers and can provide the following comments:

3.7.1 Whilst the layers provide a visual representation of the NTT project, the layers are not fully aligned or embedded with the NTT proposal.

3.7.2 In particular, the Order limits do not seem to align with the land use types and the data still appears to include both Scenario A and B data.

3.7.3 The layers also do not contain plot boundaries and the level of detail is lacking.