

Susan Hunt
Lead Member of the Examining Authority
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Date: 10 June 2026
Sent Via Email:
norwichtotilbury@planninginspectorate.gov.uk

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 5 Submission.

- i. The purpose of this submission is to provide a response to ExQ2 and comments on any further information or submissions made at Deadline 4. Notification of ECC's wish to attend hearings on the week commencing 22 June 2026 is also provided.
- 1. Responses to ExQ2**
 - 1.1. ECC responses to the ExQ2 is provided in Appendix 1.
 - 2. Notification of a wish to attend hearings on the week commencing 22 June 2026**
 - 2.1. ECC will be in attendance both virtually and in person at the following hearings:
 - Wednesday 24 June (14:00): Issue Specific Hearing 3 (Development Consent Order)
 - Thursday 25 June and Friday 26 June (if required) (10:00): Issue Specific Hearing 4 (Environmental Matters)
 - 2.2. ECC would also wish to virtually attend the Open Floor Hearing 4 on Tuesday 23 June 2026 so Officers can speak if necessary to respond to any matters raised by the ExA.

- 2.3. 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 may register the right to speak, this is to enable response or to provide clarification to any questions which may be directed at ECC.

3. Comments on the applicant's updated documents and application guide

Applicant's Comments on any Further Information or Submission Received by Deadline 3, Doc 8.4.9 [REP4-298]

- 3.1. ECC as the Local Highway Authority has provided commentary on this document within Appendix 2.

Response to Applicant's Comments on Responses to ExQ1, Doc 8.4.10 [REP4-299]

- 3.2. ECC as the Local Highway Authority has provided commentary on this document within Appendix 3 and 3A.

8.16 Health and Wellbeing and Socio economics, Recreation and Tourism Technical Note (Final Issue A) [REP4-317]

- 3.3. The technical note reviews 2019 and 2025 IMD change along the route of the project and concludes that the release of the 2025 data does not materially alter the sensitivity or assessment outcomes. In section 3.2.1, the Applicant notes that data indicates relative increase in deprivation for parts of Braintree which may require targeted consideration of potential health impacts (especially in relation to community resilience). ECC is disappointed that the Applicant does not have any recommendations to address this impact s.

8.9.1.1 Addendum to ExQ1 BIO 1.6 - Advice Letter on bats and letters of no impediment from Natural England (Final Issue A) [REP4-307]

- 3.4. ECC considers that this letter echoes similar concerns to which ECC have expressed. It is noted that Natural England questions the narrow desk study focus on barbastelle, and so it is queried whether they also have concerns on the narrow survey focus on barbastelle. Also, the following statement within this submission suggests that Natural England may also consider that there could be cause for roost resource compensation beyond just those roost trees that are confirmed by survey. Commentary on this would be welcomed accordingly.

“As raised previously, Table 5.1 of the Method Statement details the proposed compensation for any losses of confirmed roosts. The table demonstrates that for low conservation status roosts of common pipistrelle, soprano pipistrelle, Nathusius’ pipistrelle, Brandt’s, Daubenton’s, Natterer’s, serotine, noctule, Leisler’s and brown long-eared, and where a tree is identified as a roost for one roost type and one species, replacement roosts may not be required. As highlighted Natural England are concerned this may impact on the Favourable Conservation Status of the species in question. Whilst the figure 6 provided demonstrates the areas of woodland or groups of trees subject to direct impacts, it is not currently understood what resource each of these areas presents, and therefore situations where this approach might be necessary; given this Natural England would recommend a more detailed breakdown of these areas once the updated surveys have been completed. This will enable Natural England to understand the resource overall, we would recommend a breakdown of the trees’ roosting potential, with number of lost and retained trees.”

7.4 Errata Outline Landscape and Ecological Management Plan Appendix A – Arboricultural Impact Plan Part 1 and 2 (Final Issue B) [REP4-176/ REP4-177]

- 3.5. ECC continues to be disappointed regarding the lack of amendments identified which would strengthen delivery mechanisms, secure alignment with the Essex Local Nature Recovery Strategy (LNRS), or address the adequacy of the 5-year management period as raised in the Statement of Common Ground. The Applicant continues to rely on high-level outline documents and post-consent discharge, without sufficient certainty as to outcomes, monitoring, or long-term stewardship. ECC therefore maintains that further Requirements or details within the Management Plan are necessary to ensure GI and Biodiversity Net Gain (BNG) are delivered in a coordinated, effective, and policy-aligned manner over the lifetime of the project.
- 3.6. ECC notes the submission of the Arboricultural Impacts Plan (Appendix A to the OLEMP). The Plan provides a detailed spatial representation of impacts on trees, hedgerows, and woodland, including identification of features to be removed, retained, managed, or potentially affected. It also identifies constraints such as root protection areas, important hedgerows, and ancient woodland, which are relevant components of Green Infrastructure (GI).
- 3.7. ECC welcomes the additional clarity this brings. However, the update relates solely to arboricultural matters and does not introduce any changes to the OLEMP or address the overarching approach to GI delivery, monitoring or long-term management

previously raised. ECC would refer to it's response to ExQ2 DCO 2.S11 for further commentary regarding arboricultural matters.

7.17 Design Approach for Site Specific Infrastructure (DASSI) (Tracked) (Final Issue B) [REP4-184]

- 3.8. ECC welcomes the integration of landscape, visual and ecological mitigation, and the intention to deliver GI benefits through native planting, hedgerow restoration, and woodland creation, including the use of 'Environmental Areas' as multi-functional spaces intended to deliver landscape mitigation, habitat creation and Biodiversity Net Gain (BNG). The document confirms a minimum of 10% BNG and sets out that these areas will be monitored and managed for a 30-year period through the LEMP, which broadly aligns with the principles set out in the Essex Green Infrastructure Standards and reflects local landscape character.
- 3.9. The DASSI design principles for the EACN Substation state that the scheme will aim to *"maximise green infrastructure links and biodiversity and filter and screen views of new infrastructure"*. However, ECC considers that the DASSI largely presents GI as landscape mitigation and screening, rather than as a strategic, multifunctional network embedded within the design process. While Environmental Areas provide opportunities for enhancement, the approach does not clearly demonstrate how GI has informed site selection, layout, or connectivity at a wider landscape scale.
- 3.10. In particular:
- The DASSI does not clearly demonstrate how GI provision aligns with or contributes to the LNRS priorities, spatial opportunities, or nature recovery networks.
 - There is limited evidence of how GI has been used to maximise connectivity between habitats, beyond site-level planting proposals.
 - The reliance on the outline LEMP and post-consent detailing reduces certainty as to how GI, BNG and wider environmental outcomes will be coordinated across the scheme.
- 3.11. ECC also notes that the scope for variation within the DASSI is largely limited to landscape mitigation, which reinforces the need to ensure that GI outcomes are clearly defined and secured at the design stage, rather than deferred.

6.8.A1 & A16 Environment Statement Figure A8

- 3.12. ECC welcomes the provision of a comprehensive ecological baseline, including the UK Habitat Map and figures showing statutory and non-statutory designated sites. These demonstrate that the scheme is located within a densely connected ecological

network, including internationally designated SPA and Ramsar sites along the Essex coast, alongside numerous nationally designated SACs, SSSIs and Local Nature Reserves.

- 3.13. This baseline has the potential to inform the delivery of GI, BNG and alignment with the Essex LNRS, including its priorities and opportunity areas.
- 3.14. ECC recommends that the Applicant provides a clear, integrated explanation of how the ecological baseline, GI proposals, BNG delivery and LNRS priorities are aligned, supported by spatial mapping where appropriate. This remains under discussion through the Statement of Common Ground.

7.6 Outline Public Rights of Way Management Plan (Clean) (Final Issue B) [REP4-178]

- 3.15. ECC has reviewed the Public Rights of Way Management Plan and provides the following commentary:
- 3.16. When referring to the Public Right of Way, the acronym should be **PRoW** as opposed to “ProW.”

3. PRoW Management Regimes - Temporary Closure (managed)

- 3.17. Paragraph 3.1.3 - “... Management would also include the contractor pausing construction activities to allow safe passage of PRoW users, or the use of physical measures, such as fencing and gates, ‘traffic light’ systems, or direction by contractor’s staff to manage the interaction between construction activities and PRoW users.” Any gates on the PRoW itself must be agreed with the Local Highway Authority and only used in high risk locations. In respect of the same paragraph, ECC would also question the definition of “short period,” and whether this waiting time will be longer than 15 minutes – clarity must be provided on this to avoid unreasonable delay on the PRoW network.

Table 3.1 Typical interaction management regimes

- 3.18. As noted above, regarding paragraph 3.1.3 of the Plan, gates on the PRoW itself must be agreed with the Local Highway Authority and only used in high risk locations.
- 3.19. Regarding the crossing of temporary haul road within table 3.1 – “During construction of the Project, crossings of haul roads will be managed using

appropriate access controls, which may include gated access of the PRoW or the haul road, or other appropriate measures. However, at such crossing points, PRoW users may have to wait for a few minutes, whilst the haul road is in use by the construction team.” ECC requests that the Applicant details what is considered by “a few.”

- 3.20. Furthermore, in the same row of table 3.1 as above and in respect of “*Signage will be provided to warn PRoW users and drivers of construction traffic of the interface between construction traffic and the PRoW and may be supported by appropriate speed limits and driver protocols*” – ECC recommends that this should be reworded to: Signage will be provided to warn PRoW users and drivers of construction traffic of the interface between construction traffic and the PRoW and **will** be supported by appropriate speed limits and driver protocols. This amend would offer greater certainty on this point.
- 3.21. Regarding shared routes and temporary closure (managed) – ECC requests that the Applicant defines the speed that drivers will be instructed to slow down to in the affected area when haul routes and PRoW follow the same alignments.
- 3.22. Regarding overhead conductor stringing and temporary closure (managed) - ECC requests that the Applicant defines the period of time that PRoW users will be notified of any temporary closures – eg one month in advance of the temporary closure.

4.2 Management Measures – Signage

- 3.23. In respect of signage, paragraph 4.2.8 puts forward the following wording for both the advance warning and any no entry signage: “*All Public Rights of Way shown in green will remain open. There may be a requirement to temporarily control access, however you will be able to pass on the understanding that your use is restricted to the Right of Way only, please do not stray into the wider area whilst using these routes.*” ECC considers that this wording is slightly inflammatory and suggests removal and replacement with wording that points out that walkers should stick to the paths for safety.
- 3.24. In respect of contact details within the signage, ECC would welcome that at each location there will be local site supervisor contact details for local concerns rather than a main Info@ type of email address. This would provide better comfort that concerns would be addressed by a relevant and local contact as opposed to a generic contact.

- 3.25. At paragraph 4.2.10 – *“Where a PRow crosses a temporary access track or haul road, a system of signs informing PRow users of the construction activity would be put in place, together with signs warning drivers of construction vehicles of the likely presence of PRow users. Such arrangements could be comparable to an uncontrolled crossing of a road, supported by low vehicle speeds driver protocols.”* ECC requests clarity as to what will be placed at permanent haul roads. Furthermore, ECC requests clarity and definition regarding what the “low vehicle speeds” will be.
- 3.26. At paragraph 4.2.11, ECC would recommend that signs must be inspected at least weekly, at present the paragraph simply notes that the inspections will be carried out “regularly” which is considered to be too vague.
- 3.27. At paragraph 4.2.14, ECC considers that this implies that a PRow could be reinstated on a different alignment if the highway authority and landowner agree “or” a permanent diversion. That is not the case as PRow can only legally be moved by means of a legal order, or, in this case, the Applicant specifically exercising their DCO powers to permanently divert a PRow. The paragraph must be amended by removing the word “or” within this paragraph.

Management of ‘Shared Routes’ and PRow Crossings

- 3.28. At paragraph 4.2.16, the arrangements for demarcated routes to be discussed with the relevant PRow Officers must include discussion of appropriate widths for routes when separation or demarcation is needed.

Management of Short Period Closures

- 3.29. At paragraph 4.2.18, it states that PRow users may have to wait for a short period of time whilst the construction team complete or pause their task – ECC questions what is considered to be a short period of time and recommends that this is defined appropriately.
- 3.30. At paragraph 4.2.21, it is stated that National Grid will inform the relevant Local Highway Authority PRow Officer in advance of the need for any short-term closures, ECC would recommend that it would also be useful for the relevant parish authorities to also be notified in a similar manner.

Temporary Closure and Diversion

- 3.31. In respect of paragraph 4.2.27, the notification period of the relevant Local Highway Authority PRoW Officer in advance of any closures or diversions being implemented should be defined.
- 3.32. Paragraph 4.2.29 states that *“Where National Grid has sought and obtained the consent of the relevant LHA authority for additional temporary diversions (beyond those identified in Section 87 of this document and Schedule 8 of the draft DCO), it will inform the relevant PRoW officer at least seven days in advance of the start of any agreed closure and notify them when the closure has ceased”* – ECC recommends that this should be at least 14 days as opposed 7 days to allow for appropriate consideration and communication.

5.6 Inspections

- 3.33. In respect of paragraph 5.6.1, ECC requests clarity is provided as to how often site checks will be carried out across the Project to monitor compliance with the final PRoW Management Plan – at present this is noted as *“regular”* which is considered to be too vague to offer the Local Highway Authority assurance of proper monitoring.
- 3.34. ECC would request a section is included within this Management Plan regarding maintenance of the PRoW or their temporary diversion routes within the Order limits. A simple vegetation cutting regime by the Main Works Contractor will have significant benefit to users and keep complaints down for example. Any damage to the surface of temporary routes also needs to be addressed during the construction to ensure users are safe and accessible.
- 3.35. ECC would also request consideration that where Local Highway Authority PRoW Officer raises issues with a PRoW or temporary diversion route within the order limit, the concerns will be addressed, and where applicable, undertake maintenance of the routes within 14 days of notification from the Officer.

8.9.1.3 Additional Visuals for ExQ1 - HE1.13 (Final Issue A) [REP4-309]

- 3.36. ECC considers that whilst the provision of the Photomontages are useful, the wirelines provided for RVAA only represent 3D form of the Project with only some topographical information, there is no context of these within the existing views and therefore provide very little in terms of representing appropriate views.

7.12 Visualisations - Part 4 (Final Issue B) [REP4-180]

- 3.37. ECC does not consider it appropriate to take photography from behind a temporary visual obstruction.

7.12 Visualisations - Part 9 (Final Issue B) [REP4-182]

- 3.38. ECC considers that this does not represent the worst-case scenario where the viewpoint photography is taken along the Project which is misleading where background structures are obstructed by one single pylon.

4. Ecology and Landscape Working Group

- 4.1. Following discussion amongst local authorities and the relevant wildlife trusts, the need for a single Ecology Advisory Group (or similar) moving forward has been identified.
- 4.2. ECC supports the establishment of an EWG has been expressed by Suffolk County Council and Babergh and Mid Suffolk District Councils in their joint Local Impact Report, as well as Norfolk Wildlife Trust in their Written Representations.
- 4.3. ECC would support this request and the expansion of the Groups scope to include Landscape matters. It would also support the draft DCO Requirement for an Ecology and Landscape Working Group for Norwich to Tilbury. This is attached as Appendix 4

ECC welcomes the opportunity to submit this Deadline 4 response. ECC will continue to engage proactively with the applicant and the Examining Authority as this application progress through Examination.

Yours sincerely,



Graham Thomas

Head of Planning and Sustainable Development

Enc.

Appendix 1 – ECC responses to ExA2

Appendix 2 – ECC response to REP-298

Appendix 3 – ECC response to REP-299

Appendix 3A – Appendix table to ECC response to REP4-299

Appendix 4 - draft DCO Requirement for an Ecology and Landscape Working Group for Norwich to Tilbury