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# Norwich to Tilbury

## Volume 5: Reports and Statements

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**nationalgrid**

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# 1. Introduction

## 1.1 Overview

1.1.1 This draft Statement of Common Ground (SoCG) has been prepared by National Grid Electricity Transmission plc (referred to as the Applicant within this document) and Thurrock Council. It identifies areas of the Norwich to Tilbury Development Consent Order (DCO) application (the Application) where matters are agreed, under discussion or not agreed between the parties.

1.1.2 This SoCG has been structured to reflect topics of the Application which are relevant to Thurrock Council. The applicable matters considered within this SoCG apply to Thurrock Council's statutory remit. The following bullet points present the topics included in this SoCG (they are also presented in Section 3):

- Project development, description and design
- Ecology and Biodiversity
- Contaminated Land, Geology and Hydrogeology
- Health and Wellbeing (including Air Quality and Noise and Vibration)
- Historic Environment
- Hydrology, Land Drainage and Flood Risk
- Landscape and Visual
- Socio-economics, Recreation and Tourism
- Traffic and Transport
- Public Rights of Way (PRoW)
- Cumulative Effects
- Development Consent Order Other Matters

## 1.2 Summary of matters under discussion

1.2.1 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.

Table 1.1 'At a glance' summary of matters

SoCG ID	Summary of matter under discussion	Deadline for resolution
<b>Project development, description and design</b>		
3.2.11 – Household Waste Recycling Centre (HWRC)	TC considers that insufficient certainty has been provided to conclude that HWRC operations will not be materially affected. The Applicant clarifies that the scaffolding is required to support catch nets to ensure the road can remain open during the installation of the overhead wires. Exact arrangements can only be confirmed when the final positioning of the pylons to either side of the road is established. The permanent access requirement is intended to provide a guaranteed route to ensure maintenance inspections (typically by operatives in 4X4 vehicles) can be completed.	Resolution likely by Deadline 7
<b>Ecology and Biodiversity</b>		
3.3.11 – Construction effects	TC considers that the restoration measures in Buckingham Hill & Linford Pit must recognise the potential for natural regeneration in these sites. The Applicant maintains that the assessment of effects during construction presented is considered appropriate.	Resolution likely by Deadline 7
3.3.11 – Construction effects (LTC interaction)	TC to review the Draft SOCG with LTC which was submitted at Deadline 1 ( <b>8.3.4 Draft Statement of Common Ground - Lower Thames Crossing [REP1-075]</b> ) which notes that the Applicant and National Highways are willing to engage and collaborate regarding mitigation.	Resolution likely by Deadline 7
3.3.16 – Biodiversity Net Gain (delivery mechanism)	The Applicant will continue to liaise with TC regarding a potential Unilateral Undertaking.	Resolution likely to be by Deadline 7
<b>Contaminated Land, Geology and Hydrogeology</b>		
3.4.8 – Standard mitigation	The Applicant to consider incidental extraction at the new substation in Thurrock.	Resolution likely to be by Deadline 7
3.4.10 – Construction effects	This matter remains under discussion pending review of the potential for incidental extraction at the substation. The Applicant will continue to engage with Thurrock Council on this matter.	
3.4.12 – Outline CoCP		

SoCG ID	Summary of matter under discussion	Deadline for resolution
<b>Health and Wellbeing (including Air Quality and Noise and Vibration)</b>		
3.5.7 – Embedded mitigation	TC express concern regarding cumulative construction impacts on healthcare facilities. The Applicant maintains that the embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects	Resolution likely to be by Deadline 7.
3.5.8 – Standard mitigation	TC raised concerns regarding information provision to residents and stakeholders and standard noise and vibration monitoring. TC to review the Applicant’s updated position in the SOCG and move matter to agreed. The Applicant maintains that the standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects and through ongoing engagement this matter can be agreed.	Resolution likely to be by Deadline 7
3.5.9 – Additional mitigation	TC raised concerns regarding EMF. The Applicant maintains that the additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects and further detail is given in the Applicant’s response to the Examining Authority’s question HW 1.3, which is found in <b>8.9.1 Applicant’s Responses to First Written Questions [REP3-074]</b> .	Resolution likely to be by Deadline 7
3.5.10 – Construction effects	TC raise concerns about the impact of diversions and temporary or permanent closures of Public Rights of Way, low number of construction job, and construction traffic. The Applicant maintains the assessment of effects during construction presented is considered appropriate. TC to review the Applicant’s updated position in the SOCG which signposts to where concerns have been addressed.	Resolution likely to be by Deadline 7
<b>Historic Environment</b>		
3.6.6 - Data sources (archaeology) - survey data	TC raised concerns regarding the completion of fieldwork. The Applicant will continue to liaise with TC on this matter.	Matter unlikely to be agreed
3.6.10 - Key parameters and assumptions (archaeology)		
3.6.13 - Embedded mitigation	TC request further details regarding the embedded mitigation measures where a mid-level of less than substantial harm to heritage assets has been determined.	Resolution likely to be by Deadline 7

SoCG ID	Summary of matter under discussion	Deadline for resolution
	The Applicant maintains that the embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. This matter remains under discussion for archaeology.	
3.6.15 - Standard mitigation (built heritage)	TC recommend the creation of a hotline or method of contact for building owners who are concerned about the effects of construction vibration on their buildings. The Applicant maintains that based on the heritage assets identified as potentially being impacted by the Project, the current approach outlined in associated NV04 of <b>7.2 Outline Code of Construction Practice (Revision C) [REP3-025]</b> is considered to be appropriate.	Resolution likely to be by Deadline 7
3.6.17 - Additional mitigation 3.6.25 - Outline Archaeological Mitigation Strategy and Outline WSI	The <b>Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]</b> is currently being updated following receipt of comments in Local Impact Reports and Written Representations, this will be shared with stakeholders for further comment/approval and the updated version will be submitted at Deadline 5.	Resolution likely to be by Deadline 7
3.6.22 - Outline CoCP	TC to review <b>7.2 Outline Code of Construction Practice (Revision C) [REP3-025]</b> . The Applicant will continue to liaise with TC on this matter.	Resolution likely to be by Deadline 7
<b>Hydrology, Land Drainage and Flood Risk</b>		
3.7.7 – Embedded mitigation 3.7.8 – Standard mitigation	TC confirm this matter is under discussion. The Applicant maintains that the embedded and standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant seeks to engage with TC to further discuss mitigation for surface water flood risk (linked to comments received on <b>8.2 Drainage Strategy [REP1-072]</b> ).	Resolution likely to be by Deadline 7 following meeting with the technical specialists.
3.7.9 – Additional mitigation	TC requests further information to understand the cumulative impacts with LTC. The Applicant maintains that the additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects and is continuing liaison with LTC on the detailed design. Cumulative effects assessment is presented in <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects</b> .	Matter unlikely to be agreed.

SoCG ID	Summary of matter under discussion	Deadline for resolution
3.7.10 – Construction effects 3.7.11 – Operational (and maintenance) effects	TC does not consider the assessment of effects is appropriate regarding the cumulative effect of the Lower Thames Crossing. The Applicant is continuing liaison with LTC on the detailed design ( <b>3.4 Draft Statement of Common Ground - Lower Thames Crossing [REP1-075]</b> ). Cumulative effects assessment is presented in <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects</b> .	Matter unlikely to be agreed.
3.7.12 – Outline CoCP (including Flood Warning and Evacuation Plan)	TC is concerned that the Outline CoCP does not include a drainage strategy for Thurrock. The Applicant maintains that <b>7.2 Outline Code of Construction Practice (Revision C) [REP3-025]</b> includes all relevant construction mitigation measures specified in <b>6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]</b> and is appropriate for managing construction impacts from the Project.	Matter unlikely to be agreed.
3.7.13 – Flood Risk Assessment	TC noted that the flood risk map for planning has been updated in march 2025. The Applicant will engage with the LLFA to discuss and resolve the comments provided on the Applicant’s Drainage Strategy <b>8.2 Drainage Strategy [REP1-072]</b> .	Resolution likely to be by Deadline 7
<b>Socio-economics, Recreation and Tourism</b>		
3.9.7 – Embedded mitigation 3.9.8 – Standard mitigation 3.9.9 – Additional mitigation	TC has outstanding concerns about the impact on businesses and raised the need for clear communication. The Applicant maintains that the mitigation presented in <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b> and <b>7.2 Outline Code of Construction Practice (Revision C) [REP3-025]</b> is considered appropriate and adequate, in terms of its nature and scale, to address potential effects..	Resolution likely to be by Deadline 7
3.9.11 – Operational (and maintenance) effects	TC reiterate the importance that recreational routes remaining accessible. The Applicant maintains that the assessment of effects during operation (and maintenance) presented is considered appropriate. The <b>7.6 Outline Public Rights of Way Management Plan [APP-329]</b> sets out the proposed management measures for each affected recreational route and Open Access Land.	Resolution likely to be by Deadline 7

<b>SoCG ID</b>	<b>Summary of matter under discussion</b>	<b>Deadline for resolution</b>
3.9.12 – Outline CoCP	TC request a 24-hour emergency number should be available for businesses and the public if issues arise with the works. The Applicant notes that communication method will be detailed in the final CoCP during the discharge of requirements and detailed design stage.	Matter unlikely to be agreed as this is post-consent matter.
<b>Traffic and Transport</b>		
3.10.1 – Policy and legislation	TC raised concerns on missing references to local guidance. The Applicant notes that all relevant transport strategy, policy and guidance was reviewed and agreed by Thurrock Council following their review of the Draft Transport Assessment in February 2025. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 6
3.10.3 – Data gathering (1)	TC raised concerns over limited data collection, model validation and numbers and locations of any additional traffic count data.	Matter unlikely to be agreed.
3.10.4 – Data gathering (2)	The Applicant will continue to liaise with Thurrock Council in relation to this matter.	
3.10.5 – Data key parameters and assumptions	Thurrock Council queried primary sources of data used in estimation of future baseline flows. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 6
3.10.6 – Assessment methodology	Thurrock Council sought clarification on methodology for assessment within Scoping Report and whether it follows 2023 ES guidance. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 6
3.10.7 – Baseline conditions and receptors	Thurrock Council sought clarification on whether baseline conditions and receptors correspond with accepted practice and latest guidance. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 6
3.10.8 – Primary access routes	Thurrock Council requested further validation of Primary Access Routes to confirm suitability. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 6
3.10.9 – Embedded mitigation	Inclusion of mitigation measures picked up through Stage 1 RSA, dialogue with LHA (e.g. provision of additional pedestrian crossing facilities) etc. The Applicant has	Resolution likely by Deadline 6

SoCG ID	Summary of matter under discussion	Deadline for resolution
	submitted further information for Thurrock Council to review and will continue to engage in relation to this matter.	
3.10.10 – Standard mitigation 3.10.11 – Additional Mitigation	Thurrock Council has signposted the Applicant to address comments made on the CTMP (included in the SOCG). The Applicant has submitted further information for Thurrock Council to review and will continue to engage in relation to these matters.	Resolution likely by Deadline 6
3.10.12 – Construction effects	Thurrock Council sought confirmation that assessment on construction effects undertaken is accepted practice. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 6
3.10.13 – Construction effects – bus passenger delay	Thurrock Council requested further consideration is required in respect of implications and mitigations for local bus services due to public transport delay from construction effects. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 7
3.10.14 – Outline CoCP	Thurrock Council has provided comments on the Outline CoCP. This may involve potential amendments to other documents, such as wording in the ES if agreed with the Applicant. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 6
3.10.15 – Policy and legislation	Influence of Thurrock Transport Strategy 2026-2040, and Thurrock Local Transport Vision 2050 on proposals (if any) to be confirmed by Thurrock Council. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 6
3.10.16 – Study area	Thurrock Council is reviewing additional information provided by the Applicant regarding previous discussions on junctions/corridors and other points. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 6
3.10.17 – Multimodal strategy	Thurrock Council is reviewing additional information provided by the Applicant and raised concerns about double handling of materials. The Applicant has signposted information in the multi-modal assessment to demonstrate it has considered rail and waterborne modes sufficiently. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 6

<b>SoCG ID</b>	<b>Summary of matter under discussion</b>	<b>Deadline for resolution</b>
3.10.18 – Junction capacity	Thurrock Council is reviewing additional information provided by the Applicant, including previous discussions on the junction capacity assessment methodology. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 6
3.10.19 – Junction modelling	Thurrock Council is reviewing additional information provided by the Applicant, including previous discussions on junction modelling. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 6
3.10.20 – Assessment of WCH	Thurrock Council is reviewing additional information provided by the Applicant, including previous discussions on assessment of WCH impacts. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 6
3.10.21 – Impact on parking	The Applicant has signposted details of proposed traffic regulation orders (TROs) for the Project. The Applicant has clarified there are no on-street parking suspensions proposed in Thurrock, but there is a no waiting restriction proposed along a section of the A128. Engagement is ongoing between the Applicant and Thurrock Council to review comments raised regarding proposed on-street parking suspensions.	Resolution likely by Deadline 7
3.10.22 – Road safety	Thurrock Council are reviewing the comprehensiveness of road safety audits undertaken at this stage. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 6
3.10.23 – Mitigation measures	Thurrock Council is reviewing additional information provided by the Applicant. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 6
3.10.25 – Baseline conditions 3.10.26 – Growth Factors.	Thurrock Council is reviewing additional information provided by the Applicant. The Applicant will continue to liaise with Thurrock Council in relation to these matters.	Resolution likely by Deadline 6
3.10.27 – Cumulative developments	Request for more information and evidence regarding Lower Thames Crossing impacts being considered. The Applicant expects to submit an addendum to the TA to present additional modelling undertaken and will discuss with Thurrock Council.	Resolution likely by Deadline 6
3.10.28 – Key assumptions 3.10.29 – Methodology	Thurrock Council is reviewing additional information provided by the Applicant. The Applicant will continue to liaise with Thurrock Council in relation to these matters.	Resolution likely by Deadline 6

SoCG ID	Summary of matter under discussion	Deadline for resolution
<p>3.10.30 – Construction vehicle trips</p> <p>3.10.31 – Construction workforce trips</p> <p>3.10.32 – Overall impact of the project</p>		
3.10.33 – Project Team Roles and Responsibilities	Thurrock Council sought a requirement for the CTMP to be updated where / when project team members are changed. The Applicant has clarified this is not necessary because the CTMP lists roles and responsibilities which are expected to remain unchanged (independent of potential changes in names assigned to those roles).	Resolution likely by Deadline 6
3.10.34 – Pre- and Post construction surveys	Thurrock Council request to be involved in pre- and post-construction surveys. The Applicant is in agreement and has included this within the CTMP.	Resolution likely by Deadline 6
3.10.35 – Traffic management measures	Thurrock Council is reviewing additional information provided by the Applicant. The Applicant has confirmed that specific traffic management requirements (for highway works) are to be developed by the Main Works Contractor and will be subject to approvals from the Local Highway Authority.	Resolution likely by Deadline 6
3.10.36 – Implementation / Enforcement	The Applicant has confirmed that it will seek approval of the CTMP from the relevant planning authorities, following further consultations with the relevant highway authority.	Resolution likely by Deadline 7
<p>3.10.38 – Site accessibility review</p> <p>3.10.39 – Targets, strategy, and measures</p>	Thurrock Council is reviewing additional information provided by the Applicant. The Applicant will continue to liaise with Thurrock Council in relation to these matters.	Resolution likely by Deadline 6
3.10.40 – Monitoring and review	The Applicant has confirmed that it will seek approval of the CTMP from the relevant planning authorities, following further consultations with the relevant highway authority.	Resolution likely by Deadline 7
3.10.41 – Construction access approach	Thurrock Council is reviewing additional information provided by the Applicant, including details of previous AIL workshops undertaken with Local Highway Authorities to understand structural limitations and suitability of routes proposed. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 6

SoCG ID	Summary of matter under discussion	Deadline for resolution
3.10.42 – Primary access route selection	Thurrock Council is reviewing additional information provided by the Applicant, including details of routes that were discussed with Thurrock Council during regular engagement meetings since 2023. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 6
3.10.43 – Construction access and crossover design	Thurrock Council is reviewing additional information provided by the Applicant. Thurrock expects further design development on topographical survey information at the detailed design stage – which will be subject to a combined Stage 1 / 2 RSA. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 7
3.10.44 – Highway mitigation design	The Applicant confirmed that there are no ‘red’ mitigations located in Thurrock and that remaining ‘yellow’ and ‘orange’ mitigations will require further development of design details and be subject to LHA approval. Thurrock Council is reviewing additional information provided by the Applicant. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 7
3.10.45 – Traffic management	Thurrock Council is reviewing additional information provided by the Applicant. Thurrock expects further design development at the detailed design stage – which will be subject to a combined Stage 1 / 2 RSA. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 7
3.10.46 – TROs and tTROs	Thurrock Council is reviewing additional information provided by the Applicant, including records of previous engagement with the LHA. The Applicant remains committed to further dialogue with Thurrock Council and their new representatives, to agree the matters under discussion within the detailed design/ahead of works being commenced.	Resolution likely by Deadline 7
3.10.47 – PAR on Muckingford Road	Thurrock Council is reviewing additional information provided by the Applicant. The Applicant acknowledged the incorrect PAR reference used for Muckingford Road in Table 5.1 and confirmed that it expects only LGVs to use Muckingford Road. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 7
3.10.48 – Highway mitigation design on Hoford Road	Thurrock Council raised concerns associated with pedestrian and cyclists visibility for the Hoford Road Junction with Buckingham Hill Road. The Applicant has provided further engagement records to provide context for the proposed footway and non-	Resolution likely by Deadline 7

SoCG ID	Summary of matter under discussion	Deadline for resolution
	motorised user route infrastructure on Hoford Road and associated tie-ins to be developed by the Main Works Contractor.	
3.10.49 – AIL access approach	Thurrock Council sought more information on the confirmation of AIL routes by the Main Works Contractor. The Applicant has clarified that the Main Works Contractor is to liaise with the relevant stakeholders and obtain the necessary permits prior to these movements (as noted in the CTMP AIL Access Strategy).	Resolution likely by Deadline 7
3.10.50 – AIL access routes	Thurrock Council is reviewing additional information provided by the Applicant, including records of previous consultation regarding the proposed AIL access routes (July 2024 and April 2025). The Applicant will continue to engage with Thurrock Council as they are developed further.	Resolution likely by Deadline 7
3.10.51 – AIL structural investigations	Thurrock Council is reviewing additional information provided by the Applicant. The Applicant notes that there are ongoing structural investigations. The Applicant understands that any Approvals in Principle secured at this stage do not remove requirements for formal application ahead of any AIL movements.	Resolution likely by Deadline 7
3.10.52 – AIL mitigation and management measures	Thurrock Council is reviewing additional information provided by the Applicant, see discussion on ID 3.10.49 to 3.10.51.	Resolution likely by Deadline 7
<b>Public Rights of Way (PRoW)</b>		
3.11.2 – Types of PRoW	Thurrock Council has sought clarification on whether a diversion is proposed for Footpath 45 near Buckingham Hill Road. The Applicant understands that through ongoing engagement this matter can be moved to agreed.	Resolution likely by Deadline 6
3.11.3 – Proposed management regime approach	Thurrock Council's concerns remain on the Buckingham Hill Road pedestrian crossing and the suitability of Hoford Road to accommodate the design proposal (existing road width). The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 7
3.11.4 – Routes with Public Access affected by the Proposed Development	Thurrock Council has sought clarification on the diversion route proposed near Buckingham Hill Road on the Outline PRoW Management Plans. The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 6

SoCG ID	Summary of matter under discussion	Deadline for resolution
3.11.5 – Reinstatement approach	Discussions ongoing on the agreed approach to reinstatement (i.e. to original condition and / or pre-agreed condition). The Applicant will continue to liaise with Thurrock Council in relation to this matter.	Resolution likely by Deadline 6
<b>Cumulative Effects</b>		
3.12.7 – Embedded mitigation	TC request that their comments on mitigation throughout the ES and Outline CoCP are considered.	Resolution likely to be by Deadline 7
3.12.8 – Standard mitigation	The Applicant maintains that the mitigation presented is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. The Applicant reiterates the assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within the environmental topic chapters (Chapters 6 – 16 of the ES <b>[APP-138 to APP-280]</b> ).	
3.12.9 – Additional mitigation		
3.12.12 – Outline CoCP		
3.12.10 – Construction effects	TC to review <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b> . The Applicant will liaise with TC on any comments that may arise.	Resolution likely to be by Deadline 7
3.12.11 – Operational (and maintenance) effects		
<b>Development Consent Order</b>		
3.13.1 – Stages of authorized development	TC considers that notification for commencement of pre-commencement operations is insufficient and seeks a prior approval mechanism, notice period longer than 7 days, and control over surveys, investigations, and related works. The Applicant considers that adequate control over pre-commencement operations is provided through the outline management plans and that the proposed notification is appropriate. The Applicant has amended the Draft DCO to refer to “five business days” for consistency of terminology.	Matter unlikely to be agreed..
3.13.2 – Design and layout plans	TC seeks amendment to include a tailpiece allowing agreement with the relevant planning authority. The Applicant considers that the proposed DCO drafting is appropriate and notes that flexibility is already provided through provisions linked to materially new or materially different environmental effects.	Matter unlikely to be agreed.

SoCG ID	Summary of matter under discussion	Deadline for resolution
3.13.4 – Reinstatement planting	<p>TC is concerned that the current drafting does not secure early planting and allows delays until operation, and that the use of “general accordancy” introduces ambiguity.</p> <p>The Applicant considers the approach appropriate and notes that planting will be carried out no later than the first available planting season, while allowing earlier delivery where practicable.</p>	Resolution likely by Deadline 7.
3.13.5 – Reinstatement schemes	<p>TC considers the proposed 21-month period too long and seeks reinstatement within 12 months or as soon as reasonably practicable.</p> <p>The Applicant considers the 21-month period appropriate as it aligns with the temporary possession provisions in the Draft DCO.</p>	Resolution likely by Deadline 5.
3.13.6 – Surface water management plan	<p>TC notes the requirement to provide a Surface Water Management Plan is already secured through Commitment GG22 in the Outline Code of Construction Practice but is concerned that there is no explicit commitment to comply with national SuDS standards.</p> <p>The Applicant notes the Surface Water Management Plan will be in accordance with the Drainage Strategy submitted at Deadline 1 and updated at Deadline 4, which has been prepared in accordance with national SuDS standards and LLFA guidance.</p>	Resolution likely by Deadline 5.
3.13.7 – Employment and skills plan	<p>TC seeks a Local Procurement and Skills Framework to be secured through a new Requirement.</p> <p>The Applicant has submitted an Employment and Skills Plan at Deadline 5. Implementation of this plan will be secured by a new DCO Requirement.</p>	Resolution likely by Deadline 6.
3.13.8 – Site-specific mitigation	<p>TC seeks a new Requirement to secure site-specific mitigation.</p> <p>The Applicant considers that site-specific control documents are already secured through Requirements 3 and 4.</p>	Resolution likely by Deadline 5.
3.13.9 – Written scheme of contamination	<p>TC seeks a new Requirement to secure measures for the evaluation of contamination of land, groundwater, and controlled waters.</p> <p>The Applicant considers these measures are already secured through the Outline Code of Construction Practice and Requirement 4.</p>	Resolution likely by Deadline 5.
3.13.10 – Recreation and leisure management plan	<p>TC seeks a new Requirement to secure a Recreation and Leisure Management Plan.</p> <p>The Applicant considers these matters are already addressed through the Outline Code of Construction Practice and the Outline Public Rights of Way Management Plan.</p>	Matter unlikely to be agreed.

SoCG ID	Summary of matter under discussion	Deadline for resolution
3.13.11 – Applications made under requirements	<p>TC seeks for the decision-making timescales for discharge of requirements to align with the agreed Planning Performance Agreement (PPA) timescales.</p> <p>The Applicant notes the request and will continue to engage with TC on post-consent PPAs.</p>	Resolution likely by Deadline 5.
3.13.13 – Fees	<p>TC considers the proposed fee insufficient and seeks alignment with national planning fees or agreed cost recovery arrangements.</p> <p>The Applicant has amended the Draft DCO to align fees with the national schedule for discharge of conditions.</p>	Resolution likely by Deadline 5.
Appendix A - DCO Wording	<p>Discussions are ongoing in relation to detailed drafting points on:</p> <ul style="list-style-type: none"> <li>• Pre-commencement operations;</li> <li>• Limits of deviation;</li> <li>• Decision-making and approval timescales;</li> <li>• Draft protective provisions; and</li> <li>• Traffic regulation;</li> <li>• Safeguarding; and</li> <li>• Amendment of local legislation</li> </ul>	Resolution likely by Deadline 7.

## 1.3 Project Description

- 1.3.1 The Project is a proposal by National Grid to upgrade the electricity transmission system in East Anglia between Norwich and Tilbury, comprising:
- 1.3.2 A new 400 kilovolt (kV) electricity transmission connection of approximately 180 km overall length from Norwich Main Substation to Tilbury Substation via Bramford Substation, a new East Anglia Connection Node (EACN) Substation and a new Tilbury North Substation, including:
- Approximately 159 km of new overhead line supported on approximately 509 pylons, either standard steel lattice pylons (approximately 50 m in height) or low height steel lattice pylons (approximately 40 m in height) and some of which would be gantries (typically up to 15 m in height) within proposed Cable Sealing End (CSE) compounds or existing or proposed substations
  - Approximately 21 km of 400 kV underground cabling, some of which would be located through the Dedham Vale National Landscape (an Area of Outstanding Natural Beauty (AONB))
- 1.3.3 Up to seven new CSE compounds (with permanent access) to connect the overhead lines to the underground cables
- 1.3.4 Modification works to connect into the existing Norwich Main Substation and a substation extension at the existing Bramford Substation
- 1.3.5 A new 400 kV substation on the Tendring Peninsula, referred to as the EACN Substation (with a new permanent access). This is proposed to be an Air Insulated Switchgear (AIS) substation
- 1.3.6 A new 400 kV substation to the south of Orsett Golf Course in Essex, referred to as the Tilbury North Substation (with a new permanent access). This is proposed to be a Gas Insulated Switchgear (GIS) substation
- 1.3.7 Modifications to the existing National Grid Electricity Transmission overhead lines to facilitate the connection of the existing network into the new Tilbury North Substation to provide connection to the Tilbury Substation
- 1.3.8 Ancillary and/or temporary works associated with the construction of the Project.
- 1.3.9 In addition, third party utilities diversions and/or modifications would be required to facilitate the construction of the Project. There would also be land required for environmental mitigation and Biodiversity Net Gain (BNG).
- 1.3.10 As well as the permanent infrastructure, land would also be required temporarily for construction activities including, for example, working areas for construction equipment and machinery, site offices, welfare, storage and temporary construction access.
- 1.3.11 The Project would be designed, constructed and operated in accordance with applicable health and safety legislation. The Project will need to comply with design safety standards including the Security and Quality of Supply Standard (SQSS), which sets out the criteria and methodology for planning and operating the National Electricity Transmission System (NETS). This informs a suite of National Grid policies and processes, which contain details on design standards required to be met when designing, constructing and operating assets such as those proposed for the Project.

## 1.4 Format and Structure of this Document

1.4.1 This SoCG is structured as follows:

- **Section 2** provides a summary of the key engagement undertaken to date with Thurrock Council
- **Section 3** summarises the key matters and captures the status of each issue / matter
- **Section 4** includes the sign off sheet

## 2. Record of Key Engagement

### 2.1 Introduction

- 2.1.1 The Applicant engaged with Thurrock Council on the Project throughout the pre-application process. This has included:
- Non-statutory consultation in Spring 2022 and Summer 2023
  - Statutory consultation in Spring 2024
  - Targeted consultations in Spring 2025
  - Regular meetings with lead officers about the Project as a whole
  - Regular ‘Thematic Group’ meetings bringing together host authorities to discuss specific topics
  - One to one / small group technical meetings on specific detailed matters
  - Sharing of papers and documentation at key stages
- 2.1.2 Further details on the Applicant’s engagement with stakeholders is provided in the Consultation Report and the Environmental Statement.

### 2.2 Summary of Key Engagement

- 2.2.1 Table 2.1 provides an overview of the key engagement that has taken place between the Applicant and Thurrock Council.

Table 2.1 Summary of Key Engagement between National Grid and Thurrock Council

Date	Format	Topic/Description
<b>General</b>		
May 2022	Meeting	Informal project catch-up.
September 2022	Meeting	All host authority workshop.
November 2022	Meeting	Briefings on issued response to questions from OffSET with all host authorities.
November 2022	Meeting	All host authority workshop.
January 2023	Meeting	All host authority workshop.
February 2023	Meeting	Pre-consultation session with all host authorities.

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
March 2023	Meeting	All host authority workshop.
May 2023	Meeting	All host authority workshop.
June 2023	Meeting	Non-statutory consultation preferred alignment briefing to all host authorities.
July 2023	Meeting	All host authority workshop.
September 2023	Meeting	All host authority workshop.
November 2023	Meeting	All host authority workshop.
December 2023	Email Correspondence	The Applicant issued the draft Statement of Community Consultation (SoCC) to all host authorities for comment.
January 2024	Meeting	All host authority workshop.
February 2024	Meeting	Statutory consultation preferred alignment briefing to all host authorities.
March 2024	Meeting	All host authority workshop.
March 2024	Email Correspondence	The Applicant issued the SoCC to all host authorities for statutory consultation.
May 2024	Meeting	All host authority workshop.
September 2024	Email Correspondence	The Applicant issued the draft Outline Code of Construction Practice (CoCP) to all host authorities for comment.
October 2024	Meeting	The Applicant held a meeting to discuss comments from stakeholders on draft versions of the Outline Landscape and Ecological Management Plan (LEMP) and Outline CoCP.
November 2024	Meeting	Meeting to provide project and design update
November 2024	Meeting	All host authority workshop
November 2024	Meeting	Meeting to discuss approach to targeted consultations
January 2025	Meeting	All host authority workshop
January 2025	Meetings	Two meetings to provide project and design update

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
January 2025	Meeting	The Applicant held a meeting to discuss comments from the second iteration of the oCoCP and oLEMP
January 2025	Email Correspondence	The Applicant issued the second iteration of the draft Outline Code of Construction Practice (CoCP)
January 2025	Email Correspondence	The Applicant issued the draft Statement of Common Ground (SoCG)
March 2025	Meeting	Meeting to discuss the second iteration of the Outline Code of Construction Practice (oCOCP) and Outline Landscape and Ecological Management Plan (oLEMP)
March 2025	Meeting	All host authority workshop
May 2025	Email Correspondence	The Applicant issued an updated iteration of the draft Outline Code of Construction Practice (oCoCP)
May 2025	Email Correspondence	The Applicant issued a new appendix to the draft Outline Code of Construction Practice (oCoCP) - Appendix H, Draft Greenhouse Gas Reduction Strategy
May 2025	Email Correspondence	The Applicant issued the Long List of Other Developments
May 2025	Meeting	All host authority workshop
June 2025	Email Correspondence	The Applicant issued draft DCO, explanatory memorandum and draft requirements
July 2025	Meeting	All host authority workshop
August 2025	Email Correspondence	The Applicant issued draft Heads of Terms for Biodiversity Net Gain (BNG) and off-site tree provision
August 2025	Meeting	Meeting to provide project and design update
September 2025	Meeting	All host authority workshop
November 2025	Meeting	All host authority workshop
December 2025	Meeting	Meeting to discuss change application
January 2026	Meeting	Meeting to progress Statement of Common Ground
January 2026	Meeting	All host authority workshop
February 2026	Meeting	Meeting to progress Statement of Common Ground

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
March 2026	Email	Email to agree approach for Statement of Common Ground deadline 4 submission
March 2026	Meeting	All host authority workshop
April 2026	Email	The Applicant shared the Statement of Common Ground and associated summary tables.
May 2026	Email	The Applicant shared the Statement of Common Ground following Deadline 4.
<b>Ecology and Biodiversity</b>		
July 2022	Email Correspondence	The Applicant shared the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology for review ahead of the Thematic Group meeting.
July 2022	Meeting	Ecology and Biodiversity Thematic Group meeting - The Applicant presented on the Biodiversity Assessment Methodology and Arboriculture Assessment Methodology and sought feedback from Thurrock Council and other authorities.
August 2023	Meeting	The Applicant discussed the potential off-site scheme/initiatives for BNG.
March 2024	Meeting	Biodiversity Thematic Group to discuss the methodology and scope of ecology surveys outside the remit of Natural England.
May 2024	Technical Note	The Applicant issued a technical note to all host authorities outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment.
May 2024	Meeting	Optional Thematic Group call.
July 2024	Email Correspondence	The Applicant shared the Badger Report for information after it had been requested by Thurrock Council.
September 2024	Email Correspondence	The Applicant shared the Outline Landscape and Ecological Management Plan (oLEMP)
October 2024	Meeting	The Applicant hosted a meeting to discuss comments from stakeholders on draft versions of the Outline LEMP and CoCP.
January 2025	Meeting	The Applicant held a meeting to discuss comments from stakeholders on proposed mitigation for species outside the remit of Natural England
January 2025	Meeting	The Applicant held a meeting to discuss comments received on the draft Biodiversity Net Gain Report
January 2025	Email Correspondence	The Applicant shared the second iteration of the Outline Landscape and Ecological Management Plan (oLEMP)

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
January 2025	Email Correspondence	The Applicant issued a technical note to all host authorities outlining the protected species proposed mitigation measures for agreement/comment
January 2025	Email Correspondence	The Applicant issued the Biodiversity Net Gain Assessment Strategy
March 2025	Email Correspondence	The Applicant issued the draft Arboriculture Impact Assessment (AIA)
April 2025	Meeting	Meeting to discuss comments from stakeholders on second iteration of proposed mitigation for species outside the remit of Natural England.
May 2025	Meeting	Meeting to discuss the updated Proposed Protected Species Mitigation document
May 2025	Email Correspondence	The Applicant shared a new appendix to the Outline Landscape and Ecological Management Plan (oLEMP) – Appendix D, Outline Landscape Proposals.
September 2025	Meeting	Optional Thematic Group Meeting to discuss the Ecology section of the Environmental Statement (ES) for Essex South.
January 2026	Meeting	The Applicant hosted a meeting discuss the Ecology aspects of the Statement of Common Ground.

### **Contaminated Land, Geology and Hydrogeology**

August 2022	Email Correspondence	The Applicant issued a draft Geology and Hydrogeology Assessment Methodology to all host authorities.
September 2023	Email Correspondence	The Applicant issued a draft Geology and Hydrogeology Assessment Methodology to the Lead Local Flood Authorities (LLFA).

### **Health and Wellbeing (including Air Quality and Noise and Vibration)**

September 2022	Email Correspondence	The Applicant issued the Health and Wellbeing Assessment Methodology to all host authorities.
September 2022	Email Correspondence	The Applicant issued the proposed methodology and scope of the Noise and Vibration assessment for review and comment.
September 2023	Technical Note	The Applicant issued a Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology.
September 2023	Email Correspondence	Thurrock Council provided the following feedback: Signposted to the WHIASU guidance, particularly in relation to consideration of potentially vulnerable groups. Provided examples of other baseline metrics which could be used to inform the assessment.

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
		Requested that consideration of potential health effects to arise during operational stage is given.
September 2024	Meeting	The Applicant held a meeting to discuss and agree the proposed assessment scope and methodology for the Health and Wellbeing chapter of the ES.
October 2024	Technical note	The Applicant issued a refreshed Health and Wellbeing technical note on the proposed approach to the Environmental Impact Assessment (EIA), including guidance, study area, scope, and assessment methodology.
November 2025	Meeting	Optional Thematic Group Meeting to discuss the Health and Wellbeing section of the ES for Essex South.
February 2026	Meeting	The Applicant hosted a meeting discuss the Health and Wellbeing of the Statement of Common Ground.
May 2026	Meeting	The Applicant hosted a meeting to discuss the Health and Wellbeing section of the Statement of Common Ground.
<b>Historic Environment</b>		
July 2022	Email Correspondence	The Applicant issued a document detailing the scope and methodology for the Historic Environment assessment and baseline to all host authorities and Historic England.
July 2022	Meeting	Historic Environment Thematic Group to discuss the proposed approach for the EIA assessment.
September 2022	Meeting	The Applicant presented an updated approach to defining study areas, scoping of walkover and scoping of historic buildings to consider in the assessment, in response to feedback received.
January 2023	Email Correspondence	The Applicant issued the plans showing the proposed viewpoint locations for landscape and heritage ahead of the Thematic Group meeting in February 2023 to all host authorities.
February 2023	Meeting	The Applicant held a meeting with all host authorities to discuss landscape and heritage viewpoints.
June 2023	Technical Note	The Applicant issued a technical note to Historic England and host authorities (including Thurrock Council) to agree methodology for the selection of viewpoints for the Historic Environment assessment.
September 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed heritage viewpoint methodology with all host authorities and Historic England.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss the proposed locations of heritage viewpoints with host authorities and Historic England. Feedback was received from stakeholders

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
		regarding proposed viewpoints and additional viewpoints were proposed.
November 2023	Meeting	Meeting with archaeological advisors to discuss the approach to geophysical survey and trial trenching.
November 2023	Meeting	Historic Environment Thematic Group meeting to discuss proposed locations of heritage viewpoints with all host authorities and Historic England. Viewpoint locations shared in PDF and shapefile.
January 2024	Email Correspondence	The Applicant shared the updated viewpoints (including ZTV) for feedback from all host authorities, Natural England and Historic England.
March 2024	Meeting	The Applicant held an Archaeology Working Group Meeting.
March 2024	Technical Note	The Applicant shared the Historic Environment Desk-Based Assessment for review and comment.
March 2024	Email Correspondence	The Applicant responded to feedback received on viewpoints.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
May 2024	Technical Note	The Applicant shared the WSI for Monitoring GI works under archaeological supervision with Archaeology Working Group Members for review and approval.
June 2024	Technical Note	The Applicant shared the overarching WSI for the Archaeological Trial Trenching with the Archaeology Working Group Members for review and approval.
June 2024	Technical Note	The Applicant shared the Site Specific WSI for the EACN (Site 001) with the Archaeology Working Group Members (including Thurrock Council) for information.
June 2024	Meeting	Archaeology Working Group Meeting.
July 2024	Meeting	Archaeology Working Group Meeting.
August 2024	Meeting	Archaeology Working Group Meeting.
September 2024	Meeting	Archaeology Working Group Meeting
October 2024	Meeting	Historic Environment Thematic Group Meeting.
October 2024	Meeting	Archaeology Working Group Meeting.
October 2024	Email Correspondence	The Applicant shared the Setting survey locations with stakeholders.

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
November 2025	Meeting	Technical focus meeting to discuss the ongoing archaeology work on site.
December 2025	Meeting	Archaeology Working Group Meeting
December 2025	Email Correspondence	The Applicant re-issued the overarching Written Scheme of Investigation (WSI) for Archaeological Trial Trenching
January 2025	Meeting	Archaeology Working Group Meeting
February 2025	Email Correspondence	The Applicant issued Historic Environment Viewpoints information
February 2025	Meeting	Archaeology Working Group Meeting
February 2025	Meeting	Historic Environment Thematic Group Meeting regarding Historic Environment Viewpoints
February 2025	Email Correspondence	The Applicant issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment
February 2025	Meeting	Meeting to discuss draft Heritage Baseline Report
March 2025	Email Correspondence	The Applicant issued updated Historic Environment Viewpoints information
March 2025	Meeting	Archaeology Working Group Meeting
April 2025	Email Correspondence	The Applicant issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project
April 2025	Meeting	Archaeology Working Group Meeting
May 2025	Meeting	Technical focus meeting to discuss ongoing archaeology work on site
May 2025	Meeting	Archaeology Working Group Meeting
June 2025	Meeting	Archaeology Working Group Meeting
June 2025	Meeting	The Applicant shared the Archaeological Fieldwork Summary.
June 2025	Technical Note	The Applicant issued a SSWSI for Site 16.
July 2025	Meeting	Archaeology Working Group Meeting
August 2025	Meeting	Archaeology Working Group Meeting

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
August 2025	Technical Note	The Applicant issued a SSWSI for Site 15.
September 2025	Meeting	Archaeology Working Group Meeting
September 2025	Technical note	The Applicant shared Priority Geophys Prelim Grayscales with stakeholders for consideration
October 2025	Meeting	Archaeology Working Group Meeting
October 2025	Meeting	Optional Thematic Group Meeting to discuss the Heritage section of the ES for Essex South and Thurrock
November 2025	Meeting	Archaeology Working Group Meeting
November 2025	Technical Note	The Applicant shared shapefiles of the Phase 2 Geophysical Survey with the priority survey areas
December 2025	Meeting	Archaeology Working Group Meeting
December 2025	Technical Note	The Applicant shared the WSI for the Phase 2 Geophysical Survey
January 2026	Meeting	Meeting to discuss the heritage aspects of the Statement of Common Ground with Essex Place Services.
January 2026	Meeting	Meeting to discuss the heritage aspects of the Statement of Common Ground
January 2026	Meeting	Meeting to discuss the archaeology aspects of the Statement of Common Ground with Essex Place Services.
January 2026	Meeting	Archaeology Working Group Meeting
February 2026	Meeting	Archaeology Working Group Meeting
February 2026	Email Correspondence	The Applicant shared the Supplementary Environmental Information submitted to the Planning Inspectorate on the geophysical survey and archaeological trial trenching completed to date with the Archaeology Working Group Stakeholders.
March 2026	Meeting	Archaeology Working Group Meeting
April 2026	Meeting	Archaeology Working Group Meeting.
April 2026	Meeting	Meeting to discuss mitigation areas for trial trenching.
May 2026	Meeting	Archaeology Working Group Meeting.

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
May 2026	Email	The Applicant shared the Outline AMS and OWSI for further comment.
May 2026	Email	The Applicant shared the Geoarchaeological Monitoring of GI WSI for comment.
<b>Hydrology, Land Drainage and Flood Risk</b>		
June 2022	Email Correspondence	The Applicant circulated the draft Hydrology and Land Drainage Assessment Methodology for review and discussion ahead of the Hydrology and Land Drainage Thematic Group.
July 2022	Meeting	The Applicant presented the EIA approach at the Hydrology and Land Drainage Thematic Group to the Environment Agency and all host authorities.
May 2023	Technical Note	The Applicant issued a technical note for comment, which set out the approach to preparing the Flood Risk Assessment (FRA).
March 2024	Technical Note	The Applicant issued the Flood Risk Assessment Screening Report for comment.
May 2024	Meeting	Drainage / watercourse discussion.
September 2024	Technical Note	The Applicant issued the Works In, Over and Under Watercourses Technical Note and the Surface Water Management Principles Technical Note.
October 2024	Meeting	The Applicant held a meeting to discuss comments from stakeholders on the principles for surface water drainage design for above ground infrastructure and watercourse crossing designs for the Project.
October 2024	Meeting	Hydrology and Land Drainage Thematic Group Meeting
January 2025	Email Correspondence	The Applicant issued the Draft Flood Risk Assessment (FRA) for agreement/comment
January 2025	Meeting	The Applicant held a meeting to discuss comments raised from the draft Flood Risk Assessment (FRA)
March 2025	Email Correspondence	The Applicant issued Draft Flood Risk Assessment (FRA) for agreement/comment
October 2025	Meeting	Optional Thematic Group Meeting to discuss the Hydrology and Land Drainage section of the ES with Chelmsford.
November 2025	Meeting	Optional Thematic Group Meeting to discuss the Hydrology and Land Drainage section of the ES specifically flood risk.
February 2026	Meeting	Meeting to discuss the Hydrology and Land Drainage sections of the Statement of Common Ground.

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
<b>Landscape and Visual</b>		
July 2022	Meeting	Landscape and Visual Thematic Group Meeting. The Applicant shared the Landscape and Visual Impact Assessment (LVIA) Methodology and Arboricultural Assessment Methodology for review.
January 2023	Email Correspondence	The Applicant issued plans showing proposed viewpoint locations for review and comment to all host authorities.
February 2023	Meeting	The Applicant held a Landscape and Visual Thematic Group Meeting to discuss proposed viewpoint locations in Thurrock. The Applicant sought agreement on the viewpoint locations to include in the Preliminary Environmental Information Report (PEIR) and the ES.
April 2023	Meeting	The Applicant held a meeting to discuss stakeholder's feedback on EIA viewpoints previously shared.
May 2023	Meeting	The Applicant presented and discussed the responses to the feedback on the viewpoint locations received from the February meeting. Stakeholders provided feedback on updated and additional viewpoint locations at the meeting and in subsequent correspondence.
May 2023 – March 2024	Email Correspondence	The Applicant shared information, responded to further feedback on viewpoint locations received from the May 2023 meeting, and reviewed subsequent feedback received up to March 2024 with the aim to agree viewpoint locations for the PEIR and ES (based on the information available at this date).
August 2023	Email Correspondence	The Applicant issued wirelines and photomontages and proposed the approach to Zone of Theoretical Visibility (ZTV) mapping for comment.
January 2024	Email Correspondence	The Applicant shared the updated landscape viewpoints (and the ZTV) and sought feedback from all host authorities.
March 2024	Meeting	The Applicant responded to feedback received on viewpoints.
May 2024	Meeting	Optional Statutory Consultation Thematic Group call.
September 2024	Email Correspondence	The Applicant shared the Draft Landscape and Visual Methodology, Proposed LVIA Viewpoints (excel spreadsheet) and Proposed LVIA Viewpoints (map) ahead of the Landscape Thematic Group Meeting.
September 2024	Meeting	The Applicant held a Landscape Thematic Group Meeting to find agreement on the LVIA methodology and the format/presentation of photomontages and/or wirelines which will form part of the DCO application.

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
September 2024	Email Correspondence	The Applicant shared the shapefiles for the landscape viewpoints and order limits with Thurrock Council and other stakeholders following the Landscape Thematic Group Meeting.
September 2024	Email Correspondence	The Applicant shared the draft Outline LEMP and Sample Mitigation Drawings ahead of the draft Outline LEMP and Outline CoCP discussion.
October 2024	Meeting	The Applicant held a focus meeting to discuss the National Landscape.
October 2024	Email Correspondence	The Applicant shared the Draft mitigation drawings with stakeholders.
October 2024	Email Correspondence	The Applicant shared the National landscape setting study with stakeholders.
October 2024	Email Correspondence	The Applicant shared updated viewpoint information data following from the landscape thematic workshops.
December 2024	Meeting	Meeting to agree photography locations and photomontages for the ES .
March 2025	Email Correspondence	The Applicant issued an update on LVIA Viewpoints and Methodology.
October 2025	Meeting	Optional Thematic Group Meeting to discuss the Landscape and Visual section of the ES for Essex South.
January 2026	Meeting	Meeting to discuss the Landscape and Visual sections of the Statement of Common Ground.
March 2026	Email Correspondence	The Applicant sent an e-mail to seek further clarification and detail in relation to the requests for additional landscape and visual measures in Thurrock Council's Local Impact Report.
June 2026	Meeting	Meeting to discuss SoCG in relation to landscape and visual matters

### **Socio-economics, Recreation and Tourism**

July 2022	Email Correspondence	The Applicant issued the assessment methodology to stakeholders for review ahead of the Thematic Group Meeting in July 2022.
July 2022	Meeting	The Applicant held a Socio-economic, Recreation and Tourism Thematic Group Meeting to seek feedback on the proposed approach to the Socio-economics, Recreation and Tourism assessment prior to formal submission of the Scoping Report to the Planning Inspectorate. This meeting was attended by several stakeholders, including Thurrock Council.
June 2023	Technical Note	The Applicant issued a Technical Note setting out the study area and methodology for assessing businesses where visual

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
		impacts are a potential operational consideration, and Public Right of Way (PRoW) during construction and operation.
August 2023	Meeting	The Applicant held a Socio-economic, Recreation and Tourism Thematic Group Meeting to discuss the study area and methodology for assessing businesses.
April 2024	Technical Note	The Applicant shared an updated technical note with all host authorities to demonstrate how their feedback had been considered in developing the PEIR.
September 2024	Meeting	Meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
November 2024	Meeting	The Applicant held a follow up meeting to discuss and agree the Scope and Methodology for the updated Socio-economics, Recreation and Tourism Technical note on the ES Chapter.
March 2025	Technical Note	The Applicant issued the third Technical Note for Socio-economics, Recreation and Tourism
September 2025	Meeting	Optional Thematic Group Meeting to discuss the Socio-economics, Recreation and Tourism section of the ES for Essex South.

### **Traffic and Transport**

June 2022	Technical Note	The Applicant issued a Technical Note setting out the proposed Traffic and Transport assessment methodology.
July 2022	Meeting	The Applicant held the Local Highway Authority Thematic Group Meeting to discuss the proposed EIA methodology for the Traffic and Transport assessment.
September 2022	Meeting	The Applicant held a Local Highway Authority Thematic Group Meeting.
December 2022	Meeting	The Applicant held a Transport Working Group to discuss the assessment of routes for construction traffic.
August 2023	Meeting	The Applicant held a Transport Working Group to discuss the highways assessment and methodology, survey requirements, road safety audit requirements and trip regeneration methodology.
August 2023	Meeting	Meeting discussing link sensitivity, traffic counts, Abnormal Indivisible Loads (AILs), and data and underlying assumptions behind traffic and workforce calculations.
September 2023	Meeting	The Applicant held a Transport Working Group Regional Meeting.
November 2023	Meeting	The Applicant held a Transport Working Group meeting with the Local Highways Authorities.

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
November 2023	Meeting	The Applicant held a PRow Thematic Group Meeting.
January 2024	Meeting	The Applicant discussed the Draft Outline Construction Traffic Management Plan (CTMP) at the Transport Working Group.
March 2024	Document	Primary Access Routes information shared with Thurrock Council.
March 2024	Meeting	The Applicant held a Transport Working Group Regional Meeting to discuss project updates and reviews of work to date, the transport assessment in the PEIR and primary access routes.
April 2024	Meeting	The Applicant held a Transport Working Group Meeting to discuss updates to the transport assessment, multi-modal transport considerations and AIL routing with the local highway authorities.
June 2024	Meeting	The Applicant held a Transport Working Group Regional Meeting to discuss statutory consultation, sensitive junctions, AIL routing, updates on the multi-modal report and road safety audit process, speed surveys, and visibility splays, mitigation and traffic management. Highway boundary information had been passed from Thurrock Council to the Applicant for processing.
July 2024	Email Correspondence	The Applicant issued the Proposed Abnormal Indivisible Load (AIL) Routes for comment.
August 2024	Meeting	The Applicant held a Transport Working Group LHA Engagement Meeting with Thurrock Council to discuss traffic impacts from removal of stone haul roads post-construction. Highways mitigation plans for Primary Access Routes were presented and routes that were not within public highway discussed.
August 2024	Meeting	The Applicant held a Transport Working Group LHA AIL Route Discussion Meeting with Thurrock Council.
August 2024	Meeting	Meeting to discuss PRow survey locations.
October 2024	Meeting	The Applicant held a Transport Working Group Regional Meeting. General structure and content of Transport Assessment was presented. The Applicant provided an overview of the initial capacity assessment methodology.
October 2024	Meeting	The Applicant held a Transport Working Group Regional Meeting to discuss highways mitigation design and RSA progress, updates to CTMP and CWTP, and multi-modal plans.
October 2024	Email Correspondence	The Applicant requested further structural feedback for proposed AIL routes.

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
December 2024	Meeting	The Applicant held an LHA Engagement Meeting to discuss potential changes following statutory consultation, visibility splays and traffic management methodology for agreement in SoCG, access for existing utilities and AIL assessments to include impacts with/without Lower Thames Crossing works taking place.
December 2024	Email Correspondence	Email received from Thurrock Council outlining process for obtaining Approvals in Principle (AIPs) for assessment of structures along proposed AIL routes and how this would be managed alongside the DCO application.
January 2025	Meeting	The Applicant presented work in progress draft of Transport Assessment. Ran through methodology of junction sifting process, junction assessment methodology and cumulative assessment.
February 2025	Meeting	The Applicant presented examples of the likely environmental mitigation measures for junctions and Primary Access Routes predominately where WCH Amenity raised from detailed assessment within ES. Red Amber Green (RAG) strategy presented for junction mitigation.
February 2025	Email Correspondence	The Applicant issued the Mitigation and Junction RAG Strategy.
February 2025	Email Correspondence	The Applicant issued the Draft Transport Assessment and Figures.
February 2025	Email Correspondence	The Applicant issued AIL Structures Register for Thurrock Council review and feedback.
February 2025	Email Correspondence	The Applicant structural feedback for proposed AIL routes received (AIL structures register issued to Thurrock Council in Feb 2025 returned with comments).
March 2025	Meeting	The Applicant presented examples of the likely environmental mitigation measures predominately for WCH Amenity on Primary Access Routes.
March 2025	Meeting	Presented draft work in progress Transport Assessment report and noted suggested changes by Thurrock Council.
March 2025	Email Correspondence	The Applicant requested structural record information for structures along proposed AIL routes.
April 2025	Meeting	The Applicant presented results of the junction modelling assessments. Provided a recap on the junction selection process, assessment methodology, approach to mitigation, and proposed mitigation (where necessary).
April 2025	Meeting	The Applicant held a Thurrock Council AIL Workshop with police and Thurrock Council present.

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
April 2025	Email Correspondence	The Applicant issued updated information pack for proposed AIL routes.
April 2025	Email Correspondence	Thurrock Council structural record information received.
May 2025	Meeting	Presented results of the junction modelling assessments. Provided a recap on the junction selection process, assessment methodology, approach to mitigation, and proposed mitigation (where necessary).
June 2025	Meeting	The Applicant held a Regional Stakeholder Meeting with Thurrock Council. The proposed Statement of Common Ground and principals for Traffic Regulation Orders were discussed.
June 2025	Meeting	The Applicant held a Regional Stakeholder Meeting with Thurrock Council. Progress with Road Safety Audits, Statements of Common Ground, and Traffic Modelling were discussed.
August 2025	Meeting	The Applicant held a Local Highway Authority Thematic Group Meeting with Thurrock Council.
August 2025	Meeting	The Applicant held a Regional Stakeholder Meeting with Thurrock Council present. Progress with Road Safety Audits, Traffic Modelling and DCO Documentation were discussed.
August 2025	Email Correspondence	The Applicant issued AIPs for Thurrock Council review and sign-off for assessment of structures along proposed AIL routes.
October 2025	Meeting	The Applicant held a Local Highway Authority Thematic Group Meeting with Thurrock Council.
October 2025	Meeting	The Applicant held a Regional Stakeholder Meeting with Thurrock Council present. Progress with Road Safety Audits, Traffic Modelling and DCO Documentation were discussed.
October 2025	Email Correspondence	Thurrock Council review comments for AIPs received for assessment of structures along proposed AIL routes.
October 2025	Email Correspondence	The Applicant issued responses to Thurrock Council's review comments on AIPs for assessment of structures along proposed AIL routes.
November 2025	Meeting	Optional Thematic Group Meeting to discuss the Traffic, Transport and PRow section of the ES.
December 2025	Meeting	The Applicant held a Local Highway Authority Thematic Group Meeting with Thurrock Council. Thurrock Council introduced the new team from Tetra Tech who would be acting as a consultant for highways matters going forward.
February 2026	Email Correspondence	Approved and signed off AIPs for assessment of structures along proposed AIL routes received from Thurrock Council.

<b>Date</b>	<b>Format</b>	<b>Topic/Description</b>
February 2026	Meeting	The Applicant held a meeting with Thurrock Council to discuss Statements of Common Ground and to review their updated comments.
February 2026	Meeting	The Applicant held a meeting with Thurrock Council to discuss further discuss Statements of Common Ground matters and updated positions from both parties.
February 2026	Meeting	The Applicant held a meeting with Thurrock Council to discuss the TRO approach for Norwich to Tilbury.
February 2026	Meeting	The Applicant held a meeting with Thurrock Council to further discuss TRO matters for Norwich to Tilbury.
March 2026	Meeting	The Applicant held a meeting with Thurrock Council to discuss Road Safety Audit matters and Thurrock Council's comments at specific site locations.
May 2026	Meeting	The Applicant held a meeting with Thurrock Council to further discuss Statements of Common Ground matters and updated positions from both parties.
May 2026	Meeting	The Applicant held a meeting with Thurrock Council to further discuss Statements of Common Ground matters and updated positions from both parties.

# 3. Matters Agreed, Not Agreed or Under discussion

## 3.1 Overview

- 3.1.1 This chapter details the matters relevant to Thurrock Council which have been agreed, not agreed or are under discussion between the parties. Matters are arranged by topic (using broad headings, or EIA chapter headings where appropriate) and each matter is given a unique reference number to aid identification.
- 3.1.2 The red, amber, green status shows the level of agreement with Thurrock Council. Descriptions of the different levels are summarised in Table 3.1.

Table 3.1 Agreement status for matters presented in Section 3

Status	Description
Not Agreed	Indicates a final position, where it has not been possible to resolve the issue to the agreement of both parties and there remains a difference of opinion.
Under discussion	Indicates where issues are the subject of active on-going discussion.
Agreed	Indicates where an issue has been agreed or resolved satisfactorily to the agreement of both parties.

- 3.1.3 Engagement will continue as the Project develops and progresses through the various stages of the DCO process.
- 3.1.4 Table 3.2 to Table 3.13 provides the matters agreed, not agreed or under discussion in relation to the various topics.

## 3.2 Project development, description and design

Table 3.2 Matters Agreed, Not Agreed or Under Discussion in Relation to Project Development, Description and Design Matters

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<b>Strategic options/needs case</b>				
3.2.1	Needs case	<p>Norwich to Tilbury is being proposed because the existing network in East Anglia doesn't have sufficient capacity to manage the expected (and in some cases, contracted) increase in offshore wind farms (and interconnectors) needing to connect to the grid as part of the Government's target of reaching net zero by 2050. The project sits alongside other work to reinforce and upgrade the existing network in East Anglia.</p> <p>Norwich to Tilbury is listed as a key project in Appendix 2 of the NESO Clean Power 2030 Report.</p> <p>For the Applicant's position on needs case, please refer to Section 3.2 'Needs Case and Timing' in <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>.</p> <p>The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed</p>	<p>Thurrock Council considers that the existence of a national need does not override the requirement to minimise harm to local communities and environments or to demonstrate that the chosen solution represents the least-harmful means of meeting that need.</p>	Not agreed
3.2.2	Project timing	<p>Timing for the project is driven by the needs case – when offshore wind farms are contracted to connect to the UK network – the first of which are contracted to connect in 2030. The Applicant is legally obliged (under our Transmission Owner</p>	<p>Thurrock Council considers that the timing of the Project in relation to other developments, together with its cumulative impacts and the necessary community mitigation measures,</p>	Not agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers) by NESO.</p> <p>Appendix 2 of the NESO Clean Power 2030 Report shows that the constraint costs associated with a delay to the project timing as being between £2.7 and £2.8 billion.</p> <p>For the Applicant's position on project timing, please refer to Section 3.2 'Needs Case and Timing' in <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>.</p> <p>The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed</p>	<p>should be fully discussed and appropriately developed prior to construction.</p>	
3.2.3	Onshore route	<p>An onshore route allows for greater energy capacity and connectivity to feed into the grid. In assessing offshore options to deliver the same capacity as an onshore overhead line, we would need to build three subsea cables and associated infrastructure, which would add significant cost and not meet the needs case for Norwich to Tilbury.</p> <p><b>7.17 Strategic Options Backcheck and Review [APP-355]</b> and <b>7.19 2023 - Strategic Options Backcheck and Review [APP-357]</b> compare the environmental, technical, socioeconomic and financial implications for alternative routes, including offshore alternatives.</p> <p>For the Applicant's position on the onshore route, please refer to Section 3.3 'Alternatives – Offshore</p>	<p>Thurrock Council accepts the Project in principle however, the Council maintains its opposition to the Project pending resolution of the issues it has raised in its Relevant Representation.</p>	Not agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>Alternatives' in <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>.</p> <p>The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed</p>		
3.2.4	Predominantly overhead line route	<p>Norwich to Tilbury has been designed in line with policy statement EN-5 (which covers the development of new energy infrastructure) which concludes that in most cases, the government expects that overhead lines will be appropriate and should be used as standard to reinforce the grid.</p> <p><b>7.17 Strategic Options Backcheck and Review [APP-355] and 7.19 2023 - Strategic Options Backcheck and Review [APP-357]</b> compare the environmental, technical, socioeconomic and financial implications for alternative routes, including underground alternatives.</p> <p>The work undertaken shows that undergrounding, including using HVDC cables, would be significantly more expensive and have environmental impacts and present engineering challenges. Due to the higher price that would be involved in an underground alternative, we do not believe that this would be the most suitable option as all costs ultimately go onto domestic energy bills.</p> <p>For the Applicant's position on the predominantly overhead line route, please refer to Section 3.4 'Technology Choice – Overhead Line and Underground Cables' in <b>8.8.2 Applicant's</b></p>	<p>Thurrock Council accepts the Project in principle however, the Council maintains its opposition to the Project pending resolution of the issues it has raised in its Relevant Representation.</p>	Not agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p><b>Comments on Local Impact Reports [REP2-030].</b></p> <p>The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed</p>		
<b>Project development process – Design</b>				
3.2.5	Green Belt	<p>The Applicant has considered the effects on the Green Belt and all of the options connecting into Tilbury identified in <b>7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]</b> would result in new and upgraded infrastructure in the Green Belt.</p> <p>Paragraphs 7.3.497 to 7.3.537 of <b>5.6 Planning Statement [APP-085]</b> provide an assessment of the Project against relevant Green Belt policy.</p> <p>For the Applicant's position on Green Belt, please refer to Section 3.14 'Land use – Green Belt' in <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>.</p>	<p>Thurrock Council Response to Statutory Consultations (July 2024):</p> <p>The council requests that NG undertake a detailed assessment of the cumulative impact further energy infrastructure will have on the openness and visual harm in the Green Belt, evaluating the impacts of overgrounding versus undergrounding the cabling.</p> <p>Thurrock Council acknowledges that National Grid has assessed the impact the Project will have on the openness and visual harm of the Green Belt against relevant Green Belt policy.</p>	Agreed
<b>Project development process – Consultation</b>				
3.2.6	2022 non-statutory consultation	<p>Non-statutory consultation took place between 21 April 2022 – 16 June 2022. Details of this consultation and responses to feedback received during consultation are included in <b>5.1 Consultation Report [APP-066]</b>.</p> <p>The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.</p>	<p>The council acknowledges that the 2022 non-statutory consultation was conducted in line with the Consultation Strategy.</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.2.7	2023 non-statutory consultation	<p>Non-statutory consultation took place between 27 June 2023 – 21 August 2023. Details of this consultation and responses to feedback received during consultation are included in <b>5.1 Consultation Report [APP-066]</b>.</p> <p>The non-statutory consultation was undertaken in accordance with the published Consultation Strategy.</p>	<p>The council acknowledges that the 2023 non-statutory consultation was conducted in line with the Consultation Strategy.</p>	Agreed
3.2.8	2024 statutory consultation	<p>Statutory Consultation took place from Wednesday 10 April 2024 to 26 July 2024 (the end date was extended from 18 June 2024 due to the general election). Details of this consultation are outlined in the <b>5.1 Consultation Report - Appendix E: Statement of Community Consultation (SoCC) [APP-071]</b>. Responses to feedback received during statutory consultation are contained within <b>5.1 Consultation Report [APP-066]</b>.</p> <p>The statutory consultation was undertaken in accordance with the published SoCC.</p>	<p>The council acknowledges that the 2024 statutory consultation was conducted in line with the Statement of Community Consultation.</p> <p>The council would like to have sight of (a draft of the) Feedback Report before submission of the application. National Grid has communicated that the Feedback Report will be shared only after submission.</p>	Agreed
3.2.9	2025 targeted consultation	<p>Targeted consultations for Essex and Thurrock took place from 25 February 2025 – 27 March 2025, with an additional targeted consultation regarding the connection to Tilbury taking place from 18 March 2025 – 17 April 2025. Details of these consultations are outlined in the Targeted Consultation Strategy and associated targeted consultation leaflets and environmental implications of change documents. Responses to feedback received during targeted consultation are contained within <b>5.1 Consultation Report [APP-066]</b>.</p>	<p>The council acknowledges that the 2025 targeted consultation was conducted in line with the Targeted Consultation Strategy.</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>The targeted consultations were undertaken in accordance with the published Targeted Consultation Strategy.</p> <p>The approach to targeted consultation was undertaken in accordance with Section 50 of the Planning Act 2008 and associated guidance: Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects (April 2024).</p>		
<b>Other matters as required</b>				
3.2.10	Community Benefits	<p>The Applicant is preparing a community funds package in line with the 'Guidance: Community funds for transmission infrastructure' (DESNZ, 2025). In line with this guidance, the community funds will be delivered outside the development consent process, as they are not a material consideration in the decision on the proposed Project nor a matter to be secured as part of the Development Consent Order. Later in spring 2026, the Applicant will begin consulting on how the community funds should be used for Norwich to Tilbury, subject to the Project receiving consent. Throughout that consultation, we will engage with local communities and elected representatives to understand local priorities and where community funds could deliver long-lasting benefits.</p>	<p>The council encourages National Grid to engage positively with the government's new guidance on community funds for transmission infrastructure in order to work closely with partners to deliver social value and long-term benefits for Thurrock's communities, especially those most affected by the works.</p> <p>The council will engage in the Applicant's community benefits consultation process and in the delivery process should the Project gain consent to ensure long-lasting benefits are achieved for the community</p>	Agreed
3.2.11	Household Waste Recycling Centre (HWRC)	<p>The scaffolding is required to support catch nets to ensure the road can remain open during the installation of the overhead wires. Exact arrangements can only be confirmed when the final positioning of the pylons to either side of the road is</p>	<p>Thurrock Council notes National Grid's clarification regarding:</p> <ul style="list-style-type: none"> <li>The purpose of the proposed scaffolding and its intention to keep the adjacent road</li> </ul>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>established during detailed design. The plans currently show a scaffolding extent that allows for the pylons to move within the full limits of deviation (LoD) to both sides of the indicated centreline. The actual scaffolding requirement will be more limited and is likely to be positioned outside or within a small area in the HWRC. When combined with pragmatic measures where appropriate to temporarily modify HWRC site activities, we would not expect site operations to be materially affected.</p> <p>The permanent access requirement is intended to provide a guaranteed route to ensure maintenance inspections (typically by operatives in 4X4 vehicles) can be completed. However normal practice is to agree specific route and access arrangements prior to an individual visit so that the current site circumstances can be responded to with flexibility in the specific route.</p> <p>The Applicant appreciated the site visit undertaken with representatives from Thurrock Council. As set out above, the exact position of the scaffolding will be determined through the detailed design stage therefore it is not possible to update the plans at this stage. However, initial assessment work indicates that the scaffold will impact only a small corner of the site, with the aim to reduce this footprint even further as the detailed design progresses.</p> <p>The Applicant is committed to continue discussions with Thurrock Council and will provide a detailed plan once available, on this basis the Applicant considers that this matter could be moved to 'Agreed'.</p>	<p>open during installation of the overhead wires;</p> <ul style="list-style-type: none"> <li>• That the extent of scaffolding shown on the submitted plans reflects the full Limits of Deviation and that the final scaffolding arrangement is anticipated to be more limited and likely to be located outside the Linford Household Waste Recycling Centre (HWRC).</li> </ul> <p>However, Thurrock Council considers that insufficient certainty has been provided to conclude that HWRC operations will not be materially affected. The HWRC is a well-used facility serving residents, and even temporary disruption to access, circulation, boundaries, or operational areas could have a significant impact on site functionality, safety, and customer experience.</p> <p>The Council requires confirmation of:</p> <ul style="list-style-type: none"> <li>• Whether any temporary or permanent works, including scaffolding, access routes, or associated activities, would be located inside or outside the HWRC boundary and perimeter fencing.</li> <li>• The potential impacts on vehicular access to the HWRC, including the resident entrance and internal circulation.</li> <li>• Any implications for existing infrastructure, including site boundaries, containers, and operational areas.</li> </ul> <p>In respect of permanent access, Thurrock Council acknowledges National Grid's need to</p>	

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
			<p>secure access for future maintenance and inspection activities. However, the Council requires clarity on the location of the proposed access route, and how access will be managed in practice, particularly given the operational constraints of a busy HWRC. While the Council notes National Grid's intention to agree specific access arrangements prior to individual visits, this does not remove the need for certainty regarding the extent of land take, the position of access routes, and any permanent implications for the site.</p> <p>The Council attended a site visit to Linford HWRC with the Applicant and its lands team on 15 April 2026. Whilst the visit confirmed the Applicant would need less land than initially thought until the plans are updated in detail the Council maintains its current position as stated above.</p>	
3.2.12	Chapel Farm	<p>The potential requirement at Chapel Farm - and thus overlap of the Order Limits with the Council's development proposals - related to the area required for the installation of the overhead wires, the so called 'stringing or pulling zone'. This requirement only arose when the original proposals by Lower Thames Crossing (LTC) were to divert the two existing overhead lines (ZB and YYJ). We have been advised by LTC that a proposed modification to their DCO, that does not require the diversion of the YYJ or ZB overhead lines at Chapel Farm, has been accepted. This means that</p>	<p>Thurrock Council considers that this position should be reflected clearly in the Order Limits and associated plans to provide certainty that no temporary or permanent works, including stringing or pulling activities, will take place within Chapel Farm land. Subject to this clarification, this matter is agreed.</p> <p>Thurrock Council considers this matter can now be moved to Agreed as the land at Chapel Farm is no longer required for the Norwich to Tilbury project</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		the land at Chapel Farm will not now be required to be crossed by the Norwich to Tilbury Project. The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.		

### 3.3 Ecology and Biodiversity

Table 3.3 Matters Agreed, Not Agreed or Under Discussion in relation to Ecology and Biodiversity

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.3.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Ecology and Biodiversity assessment is presented in <b>Chapter 2 (Key Legislation and Planning Policy Context) [APP-126]</b> and <b>Section 8.2 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> .  All relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment.	All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	Agreed
<b>EIA – Approach and Methods</b>				
3.3.2	Study area	The study area was agreed through the Applicant's <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.3.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> .	Sufficient desktop and survey data has been collected to inform the assessment.	Agreed
3.3.4	Assessment Methodology	The assessment methodology was agreed through the Applicant's <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.	The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.5	Survey Methodology	The methodology for assessing Ecology and Biodiversity relevant to Thurrock Council was agreed through a Technical Note outlining survey methods and the scope of surveys for species outside the remit of Natural England.	The methodology for assessing Ecology and Biodiversity relevant to Thurrock Council was agreed through a technical note outlining survey methods and the scope of surveys for species outside the remit of Natural England.	Agreed
3.3.6	Key parameters and assumptions	Key parameters and assumptions associated with the Ecology and Biodiversity assessment are summarised in Section 8.4 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> . The key parameters and assumptions presented are considered appropriate.	The key parameters and assumptions presented are considered appropriate.	Agreed

#### EIA – Baseline Conditions

3.3.7	Baseline conditions and receptors	The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> . The baseline conditions and receptors presented are considered appropriate.	The baseline conditions and receptors presented are considered appropriate.	Agreed
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ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.3.8	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Ecology and Biodiversity effects, are set out in Section 8.6 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b>. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. January 2025, the Applicant issued a Technical Note to all host authorities outlining the protected species proposed mitigation measures for agreement/comment.</p>	<p>Chapter 8 of the ES recognises the effects of the proposal on part of the proposed LTC tree planting mitigation for effects on Rainbow Shaw.</p>	Agreed
3.3.9	Standard mitigation	<p>Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> and set out in <b>7.2 Outline Code of Construction Practice [REP4-164]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	Agreed
3.3.10	Additional mitigation	<p>The consideration of additional mitigation measures is presented in Section 8.6 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b>. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<b>EIA – Assessment Conclusions</b>				
3.3.11	Construction effects	The assessment of effects during construction is presented in Section 8.7 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> . The assessment of effects during construction presented is considered appropriate.	Thurrock Council agrees that there are no effects on the Thames Estuary & Marshes SPA/Ramsar/Mucking Flats SSSI. Restoration measures in Buckingham Hill & Linford Pit must recognise the potential for natural regeneration in these sites.	Agreed
3.3.12	Construction effects (LTC interaction)	The assessment of effects during construction is presented in Section 8.7 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> . The assessment of effects during construction presented is considered appropriate. The Applicant has confirmed discussions with LTC are ongoing and a draft SoCG with LTC was submitted at Deadline 1 ( <b>8.3.4 Draft Statement of Common Ground - Lower Thames Crossing [REP1-075]</b> ). Interfaces between LTC and the Project are also set out in <b>8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]</b> ; this report and the SoCG with LTC was updated and submitted to the examination at Deadline 4. The Applicant will continue to engage with Thurrock Council on this matter.	The applicant must ensure any works within Blackshots Nature Area LWS aligns with LTC impacts & mitigation. Confirmed in meeting to discuss the Statement of Common Ground on 26 January that this matter is still under discussion.	Under Discussion
3.3.13	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 8.7 of <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> . The assessment of effects during operation (and maintenance) presented is considered appropriate.	The assessment of effects during operation (and maintenance) presented is considered appropriate.	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.3.14	Outline CoCP	<p><b>7.2 Outline Code of Construction Practice [REP4-164]</b> includes all relevant construction related mitigation measures specified in <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held in October 2024 to agree on the structure for the Outline CoCP.</p> <p>Meeting held in March 2025 to discuss the second iteration of the Outline CoCP.</p> <p>A further iteration of the Outline CoCP was issued in May 2025 following the meeting and feedback in writing.</p>	<p>It is considered that the approach to date is appropriate based on the information provided.</p>	Agreed
3.3.15	Outline LEMP	<p><b>7.4 Outline Landscape and Ecological Management Plan [Revision E]</b> includes all relevant operational related mitigation measures specified in <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> and is appropriate.</p> <p>Natural regeneration within local wildlife sites is identified within <b>7.4 Outline Landscape and Ecological Management Plan [Revision E]</b> as a suitable reinstatement method. Full details will be included in the final management plan for Thurrock Council's review on the reinstatement at local wildlife sites in order to discharge the requirement.</p>	<p>There is an assumption that mitigation will typically include reseedling/replanting. So long as care is taken re. species choice/ seed mix, if this is the case Thurrock Council does not raise an in principle objection. Buckingham Hill, Linford Pit and possibly Mucking Heath LWSs should be included in the sites identified for natural regeneration of grassland (9.5.3) as these sites have evolved naturally and presence of bare ground and early successional habitat is an important component of the sites' value.</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<b>Other matters as required</b>				
3.3.16	Biodiversity Net Gain (BNG) Approach and Assessment)	<p>The Applicant will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. <b>7.1 Biodiversity Net Gain Report [APP-299]</b> sets out the approach to BNG.</p> <p>The Applicant shared the Biodiversity Net Gain strategy with stakeholders in January 2025.</p> <p>For the Applicant's position on BNG, please refer to Section 3.13 'Biodiversity, Ecology and Nature Conservation - Biodiversity Net Gain' in <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>.</p>	The BNG approach presented follows national guidance.	Agreed
3.3.17	Biodiversity Net Gain (BNG) (Delivery Mechanism)	<p>The Applicant will deliver biodiversity units onsite through replacement planting and onsite mitigation in the form of habitat creation and enhancement secured through <b>7.4 Outline Landscape and Ecological Management Plan [Revision E]</b>. 10% BNG is not fully achievable onsite so offsite biodiversity units will be required. Offsite BNG will be secured by a legal agreement and delivered through collaboration with partners and purchased from commercially registered providers. The detailed agreement for which was shared with the stakeholders in May 2026. Discussions with stakeholders are ongoing.</p> <p>Please see the Applicant's response to the Examining Authority's various questions on BNG, including DCO 1.G4, which is found in <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>.</p>	<p>Thurrock Council continues to engage with the applicant on this matter and a potential unilateral undertaking.</p> <p>The provision of off-site BNG credits to achieve BNG is of concern as Thurrock will only experience the loss of habitat and the credits will go to areas outside of Thurrock, since there are currently no registered habitat banks within Thurrock.</p>	Under Discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.3.18	Draft Arboricultural Impact Assessment (AIA)	The Applicant issued the draft AIA in March 2025. The AIA was submitted with the application for development consent, <b>13.6 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]</b> .	Email from Thurrock Council on 28 April 2025: The draft report and plans confirm that the scheme would have limited impacts on trees (loss of 10 Category B trees in Thurrock). The categorisation of the trees (B, C & U) looks appropriate. The Tree Schedule is currently being prepared and the report notes that replacement tree planting ratios have yet to be finalised. Thurrock Council have no concerns with the approach taken – it broadly follows BS5837:2012.	Agreed

### 3.4 Contaminated Land, Geology and Hydrogeology

Table 3.4 Matters Agreed, Not Agreed or Under Discussion in Relation to Contaminated Land, Geology and Hydrogeology

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.4.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Contaminated Land, Geology and Hydrogeology assessment is presented in <b>6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]</b> and Section 9.2 of <b>6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]</b> .	The ES makes reference to minerals safeguarding policy in NPS EN-1, and includes the NPPF and the Minerals Core Strategy in lists of policy, although it doesn't go into detail of the mineral safeguarding policy.	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.		
<b>EIA – Approach and Methods</b>				
3.4.2	Study area	The study area was agreed through <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.4.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within <b>6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]</b> .	Sufficient desktop and survey data has been collected to inform the assessment.	Agreed
3.4.4	Assessment methodology	The methodology for assessing Contaminated Land, Geology and Hydrogeology was agreed through <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.	The methodology for assessing Contaminated Land, Geology and Hydrogeology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.  Stakeholder comments received during the 2024 Statutory Consultation stated that Thurrock Council were in agreement with the methodology proposed for the risk assessment and management of potentially contaminated land (outlined in the PEIR).	Agreed
3.4.5	Key parameters and assumptions	Key parameters and assumptions associated with the Contaminated Land, Geology and Hydrogeology assessment are summarised in Section 9.4 of <b>6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]</b> . The key parameters	The key parameters and assumptions presented are considered appropriate.	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		and assumptions presented are considered appropriate.		
<b>EIA – Baseline Conditions</b>				
3.4.6	Baseline conditions and receptors	The baseline conditions and receptors for Contaminated Land, Geology and Hydrogeology are presented in Section 9.5 of <b>6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]</b> . The baseline conditions and receptors presented are considered appropriate.	The baseline conditions and receptors presented are considered appropriate.	Agreed
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.4.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Contaminated Land, Geology and Hydrogeology effects, are set out in Section 9.6 of <b>6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]</b> . Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Agreed
3.4.8	Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 9.6 of <b>6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]</b> and set out in <b>7.2 Outline Code of Construction Practice [REP4-164]</b> . The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Regarding the safeguarding of mineral resources, Thurrock Council feel that an incidental extraction scheme should be considered (or at least not completely discounted at this stage) in respect of resources that may underly the new substation in Section H. This area of the Order Limit appears to coincide with a Mineral Safeguarding Area (MSA) for sand and gravel. It is understood that the substation	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>This matter remains under discussion pending review of the potential for incidental extraction at the substation. The Applicant will continue to engage with Thurrock Council on this matter.</p>	<p>would be 300m x 340m, so 102,000m<sup>2</sup> (10.2 hectares).</p> <p>The Qualitative Minerals Resource and Infrastructure Assessment (that is appended to the chapter) states an incidental extraction scheme is not viable. There are references made (in paragraphs 9.5.28, 9.5.30, 9.5.34, 9.5.40, 9.5.43, 9.5.44, and 9.5.46 &amp; 9.6.4) that incidental extraction would lead to engineering requirements, additional cost, storage of significant overburden, and increased timescales.</p> <p>We consider incidental extraction to be when minerals are <i>incidentally</i> encountered during construction works and are recovered and put to beneficial use either on or off site.</p> <p>These materials would be encountered and need to be managed anyway, whether they contain minerals or not, and whether they are recovered for beneficial use (mineral) or removed from site as muck away (non-mineral).</p> <p>No additional amount of material would be generated in an incidental scheme to a standard development with no underlying minerals, so there would be no increased storage requirement. Likewise, material would only be encountered that requires removal/management anyway so there would be no increased engineering requirement. There would be no notable increase in cost or timescales.</p>	

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
			<p>Thurrock Council consider that the implementation (or at least further consideration, pending site investigation work) of an incidental extraction scheme, for the land that coincides with the new substation, would help to mitigate the impact on mineral resources/ Mineral Safeguarding Areas, and is not an unreasonable request.</p> <p>It is considered that this would be a more sustainable approach, and indeed one which is a fairly standard practice, and is not onerous to the developer.</p>	
3.4.9	Additional mitigation	<p>The consideration of additional <b>mitigation measures are presented in Section 9.6 of 6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]</b>. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	Agreed
<b>EIA – Assessment Conclusions</b>				
3.4.10	Construction effects	<p>The assessment of effects during construction is presented in Section 9.7 of <b>6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]</b>. The assessment of effects during construction presented is considered appropriate.</p> <p>This matter remains under discussion pending review of the potential for incidental extraction at the substation. The Applicant will continue to engage with Thurrock Council on this matter.</p>	<p>The assessment of effects on mineral resources is presented in paragraphs 9.7.37 – 9.7.41. It is considered that this should reflect an incidental extraction scheme for the new substation in Section H (Thurrock). This would look to recover any incidentally encountered sand and gravel for beneficial use, where viable.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.4.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 9.7 of <b>6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]</b> . The assessment of effects during operation (and maintenance) presented is considered appropriate.	The assessment of effects during operation (and maintenance) presented is considered appropriate.	Agreed
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.4.12	Outline CoCP	<p><b>7.2 Outline Code of Construction Practice [REP4-164]</b> includes all relevant construction mitigation measures specified in <b>6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181]</b> and is appropriate for managing construction impacts from the Project.</p> <p>This matter remains under discussion pending review of the potential for incidental extraction at the substation. The Applicant will continue to engage with Thurrock Council on this matter.</p>	It is considered an incidental approach to minerals extraction, for the new substation in Order Limit Section H (Thurrock), should be included as mitigation, to recover suitable sand and gravels, if and where viable.	Under discussion
<b>Other matters as required</b>				

### 3.5 Health and Wellbeing (including Air Quality and Noise and Vibration)

Table 3.5 Matters Agreed, Not Agreed or Under Discussion in Relation to Health and Wellbeing

ID	Matter	National Grid’s Position	Thurrock Council’s Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.5.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Health and Wellbeing assessment is presented in <b>6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]</b>, Section 10.2 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b>, Section 7.2 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b>, and Section 14.2 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b>.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p>Thurrock Council comments are noted, and the Applicant will continue to engage on this matter.</p> <p>The Applicant provided a response to this matter at Deadline 1 in <b>8.4.1 Applicant’s Comments on Relevant Representations [REP1-132]</b> (see page 530, in response to Suffolk County Council), confirming that Paragraph 10.2.16 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b> states that local health and wellbeing strategies, JSNAs and the health priorities they contain, have been used to inform the health and wellbeing assessment.</p>	<p>The ES makes reference to Thurrock’s Health and Wellbeing Strategy but it does not reference Health in All Policies Approach to Healthy Place-Shaping guidance or any of the JSNAs.</p> <p>Thurrock Council requires further information about how these documents have been used to inform the Health and Wellbeing Chapter of the ES and the assessment of health and wellbeing itself, including wider determinants of health.</p> <p>Matter agreed during call held 13.5.2026.</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<b>EIA – Approach and Methods</b>				
3.5.2	Study area	The study area was agreed through <b>6.19 Scoping Report [APP-288 to APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.5.3	Data sources	Sufficient desktop data has been collected to inform the assessment as presented within Section 10.4 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b> , Section 7.4 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b> and Section 14.4 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b> .	<b>Chapter 10 of the ES (Health and Wellbeing)</b> has used sufficient desk based data.	Agreed
3.5.4	Assessment methodology	<p>The main construction noise and vibration assessment considers the proposed locations of the pylon working areas, as shown on <b>6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]</b>.</p> <p>The Limits of Deviation (LoD) for overhead lines (and associated pylons) are considered in Section 9 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b>. It is stated and agreed that movement within the LoD would lead to changes in construction noise and vibration levels - increasing if movement is towards noise sensitive receptors (NSRs), and reducing if further away - without mitigation. However, the mitigation measures would vary accordingly to ensure that significant effects are avoided and adverse effects minimised in line with policy (EN1, Noise Policy</p>	<p>There is no requirement in the CoCP that the worst-case receptor distance within the LoD must be assessed. A 50m change would absolutely be significant and there is currently no commitment to reassess noise/vibration significance if final pylon positions move closer to dwellings. The assessment envelope cannot reasonably be described as worst case if it does not explicitly model that closer distance scenario, require reassessment where receptors fall closer than assumed.</p> <p>Community engagement needs to be drawn through into the Health and Wellbeing Chapter, as raised in the council's relevant representation.</p> <p>TC are satisfied to move towards agreeing the points related to noise and vibration</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>Statement for England, the NPPF and Planning Practice Guidance for Noise).</p> <p>Moreover, the LoD include the conductors and the associated conducted swing, as shown in <b>2.6.2 Design and Layout Plans – Overhead Lines [APP-042]</b>. As such, in practice pylons could not be constructed on the outer extremities of the LoD. There are additional constraints, such as roads and buildings, that fall within the LoD due to the conductor span, but where pylons could not be built, as well as pylon location constraints at ‘bends’ in the route that then inform the locations of subsequent pylons. As such, pylon locations are considerably more constrained in practice than is indicated by the LoD.</p> <p>The LoD was reviewed through the EIA process when producing the ES and there are no locations where movement towards the edge of the LoD, and towards NSRs, would lead to any likely significant adverse effects with the implementation of standard mitigation measures.</p> <p>Furthermore, the Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies, as per commitment NV05 within <b>7.2 Outline Code of Construction Practice [REP4-164]</b> for each specific pylon location, based on its proposed location within the LoD following detailed design processes. Based on the outcome of these assessments, specific mitigation measures would be identified and implemented for each pylon such that significant adverse effects are avoided. These measures would be documented in the Noise and</p>	<p>provided we are given assurances that the need for routine monitoring will be continually assessed in-line with advice from our internal Environmental Protection Team. Similarly we would expect that the Section 61 process(es) is secured and implemented through the relevant DCO processes and particularly in relation the extended working hours, again as per the advice provided by our internal Environmental Protection Team. We would continue to encourage the Applicant to work with our Environmental Protection Team to consider the potential impacts of noise and vibration arising from the development including consideration of health and wellbeing impacts and to continue to identify appropriate mitigation and enhancement measures required.</p> <p>As previously agreed, TC are now satisfied that community engagement and the feedback derived from this has been considered and changes have been made to the scheme in response to feedback.</p>	

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>Vibration Management Plan (NVMP) (which would be updated from <b>7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [REP4-170]</b> submitted as part of the application for development consent.</p> <p>In relation to community engagement, the Applicant provided a response to this matter at examination Deadline 2 in Section 4.8 'Health and Wellbeing' in <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b> (page 328).</p>		
3.5.5a	Key parameters and assumptions - climate	<p>Key parameters and assumptions associated with Health and Wellbeing are summarised in Section 10.4 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b>, Section 7.4 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b> and Section 14.4 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b>. The key parameters and assumptions presented are considered appropriate.</p> <p>Thurrock Council comments are noted, and the Applicant is seeking a meeting with the council week commencing 20 April 2026.</p>	<p>While we welcome many of the additional topics we requested during the EIA Scoping for Health and Wellbeing Chapter have been included, assessment of the cumulative health impacts and focus on climate and sustainability have not been included, nor has any rationale been provided for why this is the case. While we note that a Cumulative Impact Chapter has been submitted as part of the ES submission, no information from this assessment has been brought forward into the Health and Wellbeing Chapter. It is still our view that these topics should be included as part of the Health and Wellbeing Assessments, and we would ask that this is actioned.</p> <p>Matter agreed during call held 13.5.2026.</p>	Agreed
3.5.5b	Key parameters and	<p>Key parameters and assumptions associated with Health and Wellbeing are summarised in Section 10.4 of <b>6.10 Environmental Statement Chapter 10</b></p>	<p>Thurrock Council are satisfied to move towards agreeing the points related to noise and vibration provided we are given</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
	assumptions - Cumulative	<p>- <b>Health and Wellbeing [APP-192]</b>, Section 7.4 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b> and Section 14.4 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b>. The key parameters and assumptions presented are considered appropriate.</p> <p>Thurrock Council comments are noted, and the Applicant is seeking a meeting with the council week commencing 20 April 2026.</p>	<p>assurances that the need for routine monitoring will be continually assessed in-line with advice from our internal Environmental Protection Team. Similarly we would expect that the Section 61 process(es) is secured and implemented through the relevant DCO processes and particularly in relation the extended working hours, again as per the advice provided by our internal Environmental Protection Team. We would continue to encourage the Applicant to work with our Environmental Protection Team to consider the potential impacts of noise and vibration arising from the development including consideration of health and wellbeing impacts and to continue to identify appropriate mitigation and enhancement measures required.</p> <p>As previously agreed, we are now satisfied that community engagement and the feedback derived from this has been considered and changes have been made to the scheme in response to feedback.</p>	
<b>EIA – Baseline Conditions</b>				
3.5.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Health and Wellbeing are presented in Section 10.5 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b>, Section 7.5 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b> and Section 14.5 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration</b></p>	<p>Thurrock Council requires further information about how Thurrock's Health and Wellbeing Strategy and JSNAs have been fed into / inform the Health and Wellbeing chapter including baseline and assessment.</p> <p>Matter agreed during call held 13.5.2026.</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>[APP-256]. The baseline conditions and receptors presented are considered appropriate.</p> <p>The Applicant provided a response to this matter at Deadline 1 in <b>8.4.1 Applicant's Comments on Relevant Representations [REP1-132]</b> (see page 530, in response to Suffolk County Council), confirming that Paragraph 10.2.16 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b> states that local health and wellbeing strategies, JSNAs and the health priorities they contain, have been used to inform the health and wellbeing assessment.</p>		
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.5.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Health and Wellbeing effects, are set out in Section 10.6 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b>, Section 7.6 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b> and Section 14.6 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b>. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>The Applicant is committed to minimising disruption on local highway networks (including to healthcare facilities and other services / amenities) and acknowledges the need to mitigate impacts where possible. <b>7.3 Outline Construction Traffic Management Plan (Revision C) [REP4-174]</b> includes details on contingency routes, should the need arise. However, it should also be noted that</p>	<p>Thurrock Council has ongoing concerns (which have been highlighted in each of its responses to the applicant) about the potential cumulative construction impacts on transport routes and access to healthcare facilities and other services / amenities, particularly in relation to the potential overlap in construction timelines with the LTC.</p> <p>Having reviewed the cumulative impact, intra-project impact reports alongside the Report on the Intra-relationship between the Project and other infrastructure projects, Thurrock Council can see that efforts are being made to work with National Highways in relation to cumulative impacts / intra-project impacts. We note that early discussions are underway in relation to determining the impacts of the Project and</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>access to properties and facilities will be maintained throughout construction which may include the use of appropriate, signed diversion routes and temporary access arrangements. Emergency vehicles accessing the construction corridor will be able to do so through crossover points as well as the site access points as both have been designed to allow for emergency vehicles to access the haul roads.</p> <p>To avoid any undue pressure on local services and facilities during construction, contractors will ensure appropriate occupational health and wellbeing provision is in place for their workforce. This includes measures such as occupational health support delivered through internal Occupational Health Teams, alongside access to a range of wellbeing services, such as the Employee Assistance Programme, mental health support resources, industry wellbeing initiatives, and other supporting tools.</p>	<p>Lower Thames Crossing on transport routes and we welcome this.</p> <p>We would request that we are kept up-to-date with the progress, outputs and outcomes of these discussions to understand in more detail how this will be managed effectively to support the best outcomes for residents. We would like to keep this matter “under discussion” until further progress has been made on this and we have a detailed understanding of any impacts along with any mitigation and legacy enhancement measures identified to ensure that we can make an informed decision on this.</p>	
3.5.8a	Standard mitigation – inclusive engagement	<p>On inclusive engagement measures, please see the Applicant's response to the Examining Authority's question HW 1.9, which is found in <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>.</p>	<p>A dedicated project website has been proposed for keeping residents and other stakeholders updated during the construction period which is welcome. However, Thurrock Council requires further information about whether there are plans to disseminate information in alternative forms, such as through paper copies. Thurrock Council has some concerns that for residents who experience digital exclusion (for example, don't have access to the internet and / or the skills and confidence to access websites) may be disadvantaged in receiving updates.</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
			<p>This requires further consideration to reduce health inequalities and enhance health equity.</p> <p>As outlined during a meeting on 13/05/26, we are now satisfied that our concerns around the potential for digital inclusion have been addressed and are happy to agree to this matter.</p>	
3.5.8a	Standard mitigation – noise and vibration	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 10.6 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b>, Section 7.6 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b>, Section 14.6 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b> and set out in the <b>7.2 Outline Code of Construction Practice [REP4-164]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>No significant health and wellbeing impacts have been identified in the assessment set out in <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b> and as such there is no requirement for monitoring measures. However, the Applicant recognises that uncertainty while the Project is developed may cause anxiety. The Applicant has sought to reduce potential effects on communities and residents through routeing and design. The Applicant has also sought to reduce concern or uncertainty about the proposals through making timely design decisions and engaging with</p>	<p>Routine noise/vibration monitoring is not currently proposed, but monitoring (either pre-agreed or reactive) will be done as needed. Routine monitoring is recommended, even informally (e.g., listening checks), with detailed records maintained and available on request.</p> <p>In relation to Noise and Vibration please see our comments included above in relation to Matter 3.5.4.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>the people and stakeholders throughout the development of the Project. The Project team will continue to engage with people potentially affected during progress of the Project, through the use of a dedicated project phone line and email address. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns.</p> <p>Noise and vibration monitoring would be undertaken by the contractor if required. This may form part of the standard noise management practices and part of best practicable means (BPM) is secured by NV01 of <b>7.2 Code of Construction Practice [REP4-165]</b>, and may form part of Section 61 agreements, though consultation with the local authority.</p> <p>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.</p>		
3.5.9	Additional mitigation	<p>On engagement measures relating to EMFs, please see the Applicant's response to the Examining Authority's question HW 1.3, which is found in <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>.</p> <p>The consideration of additional mitigation measures are presented in Section 10.6 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b>, Section 7.6 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b> and Section 14.6 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration</b></p>	<p>Resident concerns, feelings and perceptions of safety as relate to EMFs – while we welcome the proposal that National Grid may look to deliver a dedicated programme of communication and scientific information relating to EMFs, we require more information about what this will look to deliver, to who and how often will communications be shared. It is our view that given the size and nature of the proposed development that further mitigation should be delivered to support residents to feel more</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>[APP-256]. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>Resident concerns, feelings and perceptions of safety as relate to EMFs is something the Applicant has considered throughout the Project. The Applicant will operate a public EMF helpline available for residents to contact and discuss any aspects of EMF as well as a website, www.emfs.info to provide factual information about EMFs from electricity infrastructure. Both the EMF helpline and website have been available since pre-application consultation and will continue to address any concerns. Regarding a dedicated programme of communication and scientific information relating to EMFs, the provision of one to one conversations via the helpline and information on the website provide this service for local residents. If residents require further information via workshops, the Applicant would welcome discussions about what this will look to deliver, to who and how often will communication be shared to facilitate these events.</p>	<p>informed and in control as relates to EMFs. We would recommend that consideration be given to National Grid delivering a series of workshops for local residents who may be impacted by the project to learn about EMFs. The other mitigation proposed in Chapter 10 of the ES is considered appropriate.</p>	

### EIA – Assessment Conclusions

3.5.10	Construction effects	<p>The assessment of effects during construction is presented in Section 10.7 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b>, Section 7.7 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b> and Section 14.7 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b>. The assessment of effects during construction presented is considered appropriate.</p>	<p>Thurrock Council has ongoing concerns about the impact of diversions and temporary or permanent closures of Public Rights of Ways (PRoWs) and the potential of these closures to change residents' behaviour (leading some to engage less frequently in leisure and recreation activities along these routes / becoming less physically active). While some information about these closures</p>	Under discussion
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ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>The Applicant responded to Thurrock Council's concerns around PRow closures, including cumulative effects considering the LTC project in <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b> – see responses to paragraphs 6.8.6 and 6.8.7 of Thurrock Council's Local Impact Report on pages 790 to 791. Paragraph 17.5.47 of <b>6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]</b> states that where other development presents a potential inter-project cumulative effect in relation to specific PRow, appropriate PRow management measures (for example diversion routes) would be implemented to minimise disruption to physical activity.</p> <p>All relevant socio-economic impacts have been considered as part of <b>6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]</b>. This includes impacts associated with changing local population dynamics and cohesion as a result of an influx of construction workers. The assessment has considered the potential for certain sensitive groups (such as older people) to feel more vulnerable as a result of the presence of construction workers/activity in an area, with opportunities highlighted to help overcome this, including community engagement and awareness raising as set out in <b>7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [REP4-168]</b> and dissemination of information to local communities during the construction period via the Project website.</p>	<p>is outlined within the ES Health and Wellbeing Chapter and we note the inclusion of a PRow Management Plan as part of submission, we require further clarity on the description of a closure being for the “duration of works”- could you clarify the timing of and length of closure for this description? Furthermore, how have cumulative impacts of PRow closures and diversions been considered, when reviewed in conjunction with the impacts from LTC?”</p> <p>A low proportion of the construction jobs are expected to be filled by people who live locally (10% across the entire project footprint) compared to a proposed 90% of construction roles being recruited from outside of local areas. Impacts on healthcare facilities do not appear to have been assessed as part of the Health and Wellbeing Chapter and require further consideration. It would be helpful if National Grid could provide further information about what health infrastructure and welfare facilities will be provided for construction workers within each of the Construction Compounds in Thurrock.</p> <p>There is potential for construction traffic to have a significant negative impact on local air quality. Any potential impact on public rights of way or air quality will also cause issues for public health in the borough. The applicant has not yet provided sufficient information to adequately assess these impacts, and so</p>	

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		<p>It is also worth highlighting the number of construction workers on site at any one time; <b>6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265]</b> states that there would be an average of around 1,720 full-time-equivalent workers across the 180 km route at any one time and that this is a relatively modest number when compared to large-scale developments in other sectors.</p> <p>To avoid any undue pressure on local services and facilities during construction, contractors will ensure appropriate occupational health and wellbeing provision is in place for their workforce. This includes measures such as occupational health support delivered through internal Occupational Health Teams, alongside access to a range of wellbeing services, such as the Employee Assistance Programme, mental health support resources, industry wellbeing initiatives, and other supporting tools.</p> <p>The assessment of emissions from construction traffic is described in section 7.4 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b>. Results of the assessment are discussed in Section 7.7 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b> and <b>6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150]</b>. 59 sensitive human receptor locations were selected to be representative of potential for air pollution exposure. These are shown in <b>6.7.F5 Environmental Statement Figure 7.5 - Air Quality Affected Road Network [APP-155]</b>. The modelling</p>	<p>Thurrock Council is not satisfied that they will be effectively avoided or mitigated.</p> <p>In relation to concerns about the impact of diversions and closures to Public Rights of Way, have reviewed the Outline PRoW Management Plan we can see that recognition of the impacts of such diversion and closures on resident's choices and ability to engage in physical activity, alongside the potential for mental wellbeing impacts have been considered. We require assurances that the proposed mitigation (e.g. clear signage / wayfinding where diversions are in place and early communication about closures / diversions etc) and legacy enhancement measures (e.g. improvements to surfacing of pathways affected etc) will be secured through the relevant DCO processes and that this will be delivered as part of the Project.</p> <p>We also still require further information about how the cumulative impacts of closures / diversions of PRoWS in relation to other infrastructure projects, and in particular the Lower Thames Crossing will be assessed and managed. We could not see evidence of this consideration within the Report on the Interrelationships between the Project and other infrastructure projects. Therefore, this matter should remain under discussion until this information is provided.</p>	

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		<p>results predicted negligible changes in pollutant concentrations for NO2, PM10 and PM2.5 at these receptor locations. Whilst it is not possible to assess every sensitive receptor including public rights of way, the receptors selected are considered to be representative of the potential impacts and no likely significant effects are predicted, with the overall conclusions being negligible.</p>		
3.5.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 10.7 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b>, Section 7.7 of <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b> and Section 14.7 of <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b>. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p>Paragraph 10.7.135 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b> notes local community feedback from statutory and non-statutory consultation relating to anxieties about the perceived effects of EMFs, particularly on vulnerable populations such as children. The Applicant has responded to this feedback, see the Applicant's response to the Examining Authority's question HW 1.3, which is found in <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>.</p> <p>The Applicant provided a response at Deadline 1 in <b>8.4.1 Applicant's Comments on Relevant Representations [REP1-132]</b> (see page 530, in</p>	<p>Thurrock Council remains concerned that community engagement and feedback has not been drawn through into the assessment and in turn conclusions reached. Thurrock Council requires further information about how the relevant Thurrock guidance including JSNAs have fed into the assessment.</p> <p>Matter agreed during call held 13.5.2026.</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>response to Suffolk County Council), confirming that Paragraph 10.2.16 of <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b> states that local health and wellbeing strategies, JSNAs and the health priorities they contain, have been used to inform the health and wellbeing assessment.</p>		
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.5.12	Outline CoCP	<p><b>7.2 Outline Code of Construction Practice [REP4-164]</b> includes all relevant mitigation measures specified in <b>6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]</b>, <b>6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]</b> and <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b> and is appropriate for managing construction impacts from the Project.</p> <p>Commitment GG30 in <b>7.2 Outline Code of Construction Practice [REP4-164]</b> includes active community liaison, including advance notification of disruptive activities, provision of contact details, and a formal complaints handling process.</p> <p>On communication strategy, please see the Applicant's response to the Examining Authority's question HW 1.3, which is found in <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>.</p>	<p>Thurrock Council are aware of and have reviewed Appendix E of the Outline OCoCP "Community Engagement and Public Information" which provides a section on the Complaints Procedure and outlines what the Complaints Procedure Plan will look to include once developed by the Mains Contractors, (presumably once consent has been granted or as part of the final version of the CoCP) The content of this document provides further detail on the elements we would expect to see including:</p> <ul style="list-style-type: none"> <li>• Where (e.g. dedicated telephone line and project website) and how to log a complaint and to whom</li> <li>• Timeframe for response to complaints</li> <li>• Potential solutions / remedies available to address complaints</li> <li>• Who to contact in the event that the complainant is not satisfied with the outcome.</li> </ul> <p>It also highlights that minor issues will be handled primarily by the Mains Works</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
			<p>Contractors and that escalations for major issues will be dealt with by National Grid. Subject to the provision of the information outlined above, and provided that development, delivery, appropriate communication to residents about the Complaints Process, and ongoing monitoring of the effectiveness of this Complaints Procedure Plan are secured through the DCO processes, we are satisfied with the arrangements. We are also satisfied that these measures will be delivered to a satisfactory level, with agreement from the relevant departments within the Council. On this basis, we are assured that there will be clear mechanisms for residents to raise concerns and have them addressed in a timely manner and can look to agree this matter.</p>	
<b>Other matters as required</b>				
3.5.13	Percussive piling	The agreement of Thurrock Council on this matter is acknowledged and welcomed.	<p>The applicant has confirmed that the construction noise and vibration assessment assume the use of percussive piling at all pylon locations as a worst-case assessment scenario. This approach is accepted as an appropriately precautionary basis for assessment. The applicant has further stated that, in practice, percussive piling would not be used where it can reasonably be avoided and that alternative construction methodologies would</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
			<p>be considered following detailed assessment.</p> <p>It is acknowledged that there may be locations where percussive piling is required due to site specific ground conditions or engineering constraints but should not be the default option (which is confirmed by the Applicant).</p>	

### 3.6 Historic Environment

Table 3.6 Matters Agreed, Not Agreed or Under Discussion in Relation to Historic Environment

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.6.1	Policy and legislation (Archaeology)	<p>The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in <b>6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]</b> and Section 11.2 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment (Revision B) [AS-068]</b>.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.</p>	Thurrock Council (Archaeology) is currently reviewing the relevant documentation. The ES Chapter 11.2 looks to contain all relevant legislation, policy and guidance.	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.6.2	Policy and legislation (Built Heritage)	<p>The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in <b>6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]</b> and Section 11.2 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment (Revision B) [AS-068]</b>.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p>The Applicant notes Thurrock Council's request for further clarity in relation to non-designated heritage assets. All non-designated heritage assets were assessed to determine their value in accordance with <b>6.19 Scoping Report [APP-288 – APP-296]</b>, <b>6.20 Scoping Opinion [APP-297]</b> and the methodology set out in <b>6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]</b>. Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. In NPS (EN-1) instructions regarding the Applicant's assessment at paragraph 5.9.9 states '<i>The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these</i></p>	<p>Query raised with National Grid regarding Paragraph 11.4.25 on page 26 of Document 6.11 Environmental Statement Chapter 11 – Historic Environment - that the settings of all Low value non-designated heritage assets (which include locally listed buildings) have not been assessed which would not appear to be in accordance with paragraph 5.9.7 of the Department for Energy Security and Net Zero Overarching National Policy Statement for Energy (EN-1).</p> <p>Thurrock Council (Built Heritage) advises that based on a further review of the identification and assessment of the value of NDHA buildings in Document: 6.11.A1 Environmental Statement Appendix <b>11.1 Historic Environment Baseline Report [APP-209]</b> we are able to agree this matter.</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p><i>along with how the mitigation hierarchy has been applied in the ES and in several places refers to detail being proportionate to the importance/significance of the heritage asset'. The Project therefore considers that it has appropriately complied with relevant policy in the NPS (EN-1) regarding assessment of impacts to non-designated heritage assets.</i></p>		
<b>EIA – Approach and Methods</b>				
3.6.3	Study area	<p>The study area was agreed through the <b>Applicant's 6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.</p> <p>The study area was also agreed through subsequent thematic group meetings where further comments were addressed.</p>	<p>The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p> <p>The study area was also agreed through subsequent thematic group meetings where further comments were addressed.</p>	Agreed
3.6.4	Data sources (Built heritage)	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment (Revision B) [AS-068]</b>.</p> <p>Non-designated historic buildings were identified in addition to those included in the HER and Local Lists. This was primarily through historic mapping. The methodology for desk-based research and walkover included identification of any previously unknown heritage assets, including historic buildings. The Historic Environment Baseline Report <b>(6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209])</b> is organised geographically and by</p>	This matter is agreed.	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>period and includes baseline information on non-designated historic buildings. All assessed heritage assets were referred to in text either by their NHLE number in the case of designated assets, or a Project ID number for non-designated assets. The baseline report and assessment tables are not structured by asset type as some heritage assets can contain both above ground built elements and archaeological remains.</p>		
3.6.5	Data sources (archaeology) - Desktop	<p>Sufficient desktop data has been collected to inform the assessment as presented within Section 11.4 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment (Revision B) [AS-068]</b>.</p>	<p>Thurrock Council has reviewed the relevant documentation and confirms that sufficient desktop data has been collected (agreement confirmed during meeting January 2026.)</p>	Agreed
3.6.6	Data sources (archaeology) – survey data	<p>Sufficient survey data has been collected to inform the assessment as presented within Section 11.4 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment (Revision B) [AS-068]</b>.</p> <p>The Applicant will continue to engage on this matter through the monthly Archaeology Working Group Meetings with the archaeological advisors to the local planning authorities and Historic England.</p> <p>Historic Environment walkover surveys have been undertaken across 97% of the Order Limits. Geophysical survey has been undertaken across 96% of priority areas and 30% of phase 2 areas, at the point of submission in January 2026 of the <b>Supplementary Environmental Information [AS-068 to AS-083]</b>. This represents a combined total of 74% of the overall geophysical survey. area and the area of intrusive impact for the Project. It is intended to submit the results of the phase 2 geophysics fieldwork that has been completed up to</p>	<p>Thurrock Council notes the fieldwork proposed prior to application has not been completed and the impact of this to inform the assessment is under review. This matter remains under discussion</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>the 17 April 2026 into Deadline 6 (7.7.26) of the Examination. This would then represent a combined total of 92% (approximately 2050ha) of the overall geophysical survey area and the area of intrusive impact for the Project.</p> <p>Archaeological trial trenching had been completed for 89% of priority areas (approximately 3000 trenches) at the point of submission of <b>Supplementary Environmental Information [AS-068 to AS-083]</b>. The remaining 11% of the priority archaeological trial trenching is in progress and fieldwork was largely completed in April 2026. Final reports of this element of the archaeological trial trenching are expected in August 2026 and therefore are not expected to be available during examination.</p> <p>The fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State.</p> <p>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.</p>		
3.6.7	Assessment methodology (Built heritage)	<p><b>6.20 Scoping Opinion [APP-297]</b> states: 'The Applicant should make effort to discuss and agree relevant non-designated heritage assets for assessment and the detailed assessment methodology with relevant local planning authorities.'</p>	<p>Thurrock Council raised at statutory consultation that they were awaiting further engagement with National Grid to agree the methodology/selection process for viewpoint assessments. At this stage, the methodology for the assessment of heritage specific viewpoints presented in March 2023 is felt to</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>Thurrock Council raised at statutory consultation that they did not agree with the values assigned to listed buildings as set out in the PEIR. Thurrock Council requested that all designated heritage assets should be categorised as 'high value' and that some non-designated heritage assets should be considered of medium value as they may be of regional importance. The Applicant's methodology already accounts for non-designated heritage assets being assigned a range of values, including some which are considered medium value. There is precedent for the approach to designated heritage assets and professional judgement is always used when assigning these values. Therefore, as per the Scoping Opinion report, the majority of Grade II listed buildings will remain medium value assets.</p> <p>The Applicant's position regarding non-designated heritage assets is as outlined in section 3.6.1 (Policy and Legislation) above.</p>	<p>be insufficient in scope, with limited information given on the reasons for inclusion/ omission of numerous assets. This matter is agreed.</p>	
3.6.8	Assessment methodology (Archaeology)	<p>The methodology for assessing Historic Environment was agreed through the Applicant's <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and the <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.</p>	<p>Thurrock Council is in agreement with this matter.</p>	Agreed
3.6.9	Key parameters and assumptions (Built heritage)	<p>Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment (Revision B) [AS-068]</b>. The key parameters and assumptions presented are considered appropriate.</p>	<p>Thurrock Council (Built Heritage) is in agreement with the matter following review of the ES.</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.6.10	Key parameters and assumptions (Archaeology)	<p>The fieldwork undertaken to date (see response to 3.6.6) comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State.</p> <p>The Applicant has provided a response to this matter at Deadline 3 is response to HE 1.43 in <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>.</p> <p>The assessment presented in <b>6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]</b> and <b>6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]</b> has taken a precautionary approach and assessed non-designated heritage assets where there is potential for archaeology, even if this had not been confirmed by field evaluation. This situation is common for all types of development. There are measures in place through Requirement 5 of <b>3.1 Draft Development Consent Order [REP4-037]</b> and <b>7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]</b> to secure agreement of any further evaluation and/or mitigation prior to the start of works, which provides protection for currently unknown archaeology.</p> <p>The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the</p>	<p>Thurrock Council (Archaeology) is currently reviewing the ES Chapter. Until the completion of intrusive field evaluation there is not agreement with the statement under 11.4.33 that "The information obtained to date provides sufficient detail to characterise the likely nature and extent of any currently unrecorded remains.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as <b>6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]</b> to <b>6.11.F6 Environmental Statement Figure 11.6 - Phase 2 Geophysical Survey Preliminary Results [AS-083]</b>, of which the historic environment stakeholders are aware. Further details can be found in response to ID 4.13.25 in <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>.</p>		
<b>EIA – Baseline Conditions</b>				
3.6.11	Baseline conditions and receptors (Built Heritage)	<p>The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment (Revision B) [AS-068]</b>. The baseline conditions and receptors presented are considered appropriate.</p> <p>Further detail relevant to this section are outlined in section 3.6.3 (Data Sources).</p>	This matter is agreed.	Agreed
3.6.12	Baseline conditions and receptors (Archaeology)	<p>The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment (Revision B) [AS-068]</b>. The baseline conditions and receptors presented are considered appropriate.</p> <p>In February 2025 the Applicant issued a draft Historic Baseline Report including Annex C and Annex D for agreement/comment and held a meeting on the topic.</p>	Thurrock Council agreed this matter during call in January 2026.	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.6.13	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Historic Environment effects, are set out in Section 11.6 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment (Revision B) [AS-068]</b>. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>Matter remains under discussion for archaeology.</p> <p><b>5.15 Design Development Report [APP-122]</b> provides an explanation of the main changes in the route alignment, infrastructure siting and technology incorporated into the Project following review and consideration of the feedback received to the 2024 statutory consultation and to the targeted consultations held in 2025. <b>5.15 Design Development Report [APP-122]</b> addresses the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors.</p> <p>April 2025, The Applicant issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project.</p>	<p>The embedded and mitigation measures are acceptable in principle, however, the residual effects of the proposals at both Construction and Operation and Management phases of the project include a mid-level of less than substantial harm to the significance of some designated heritage assets. Following our review and assessment of NG's conclusions on the impacts of the project on heritage assets, for each designated heritage asset where a mid-level of less than substantial harm has been identified to its significance at the Operation and Maintenance phase of the project we would request further details are provided by National Grid regarding the embedded mitigation measures that have been employed, for example, the selected overhead line routes and pylon locations and whether or what, if any, alternatives were assessed prior to the submitted project design.</p> <p>Further time is needed to review <b>5.15 Design Development Report [APP-122]</b> but we note this refers only to changes requested to the route alignment which were made before the final ES.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>May 2026, following stakeholder feedback, the Applicant has re-issued an updated version of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation <b>[APP-328]</b> with the intention that any further comments can be addressed and included for submission at Deadline 5.</p> <p>The Applicant provided further detail on embedded, standard and additional mitigation for designated heritage assets in response to ExQ1 HE 1.36 in 8.9.1 Applicant's Responses to First Written Questions <b>[REP3-074]</b>.</p> <p>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.</p>		
3.6.14	Standard mitigation (Built heritage)	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment (Revision B) [AS-068]</b> and set out in <b>7.2 Outline Code of Construction Practice [REP4-164]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>Regarding commitment H06 the term 'appropriate' in this context refers to the reinstatement of landscape features (such as hedgerows, fences, walls, and earthworks) in a manner that is sensitive to the local character, setting, and historic significance of the area. The general approach and reinstatement plans can be found in Section 9 of <b>7.4</b></p>	<p>We recommend that standard mitigation measure H06 is further expanded to clarify the definitions of 'appropriate' replacements, and ask for the relevant local authorities to be contacted before such elements are removed, in order to discuss the manner of replacement as well as the extent of any removals of fences, walls, etc.</p> <p>Update to comments 6/5/26:</p> <p>Regarding H06, The applicant's explanation of 'appropriate' in this context is acceptable, however, Section 9 of <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b> makes no specific reference to the historic environment or reference to historic environment records. The commitment set out here by the applicant</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p><b>Outline Landscape and Ecological Management Pan [REP3-030].</b> Specifically, this means:</p> <p>Replacement features will be of a similar type, scale, and material to those lost, wherever possible, reflecting the character and function of the original feature.</p> <p>Design and siting will be informed by local landscape character assessments, historic environment records, and where relevant, consultation with Local Planning Authorities and heritage specialists.</p> <p>Species selection for replanting (e.g. hedgerows) will seek to match historic or locally appropriate species mixes, and construction/restoration of walls or banks will use traditional techniques and materials where feasible</p> <p>If retention of a feature is not possible, the replacement or reinstatement will be designed to ensure that the heritage, ecological, and landscape value is maintained, or where possible, enhanced.</p> <p>The Applicant has updated <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b> at Deadline 5 to contain the text above. Also note section 9.8 of <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b> specifically covers reinstatement of protected lanes, which are assessed as heritage assets. Sections 7 and 9 also refer to historic hedgerows.</p> <p>The Applicant considers that with this update this matter can be moved to Agreed.</p>	<p>in the SoCG (highlighted yellow opposite) should be captured in <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b> or another suitable document, with specific reference to heritage assets.</p>	

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.6.15	Standard mitigation (Built heritage)	<p>Regarding H07, <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b> did not identify any heritage assets in Colchester, Braintree, Brentwood, Basildon or Thurrock that would be impacted by the Project. The vibration assessment identified one historic structure, the grade II listed Little Bromley War Memorial (1493299), in Tendring that has potential to be impacted. As this is not a residence the current approach in H07 and the associated NV04 of <b>7.2 Outline Code of Construction Practice [REP4-164]</b> is considered to be appropriate.</p> <p>As outlined in <b>7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [REP4-168]</b> a community relations team will be appointed to engage with local residents and building owners and provide dedicated community relations and external communications support. The community relations team will work closely with the Main Works Contractors to ensure all information is up to date and communicated in a timely manner to interested parties, local communities and affected landowners. In addition, <b>7.2 Outline Code of Construction Practice [REP4-164]</b>, commitment GG30 includes: "A contact number will be provided which members of the public can use to raise any concerns or complaints about the Project. All construction related complaints will be logged by the Main Works Contractor(s) in a complaints register, together with a record of the responses given and actions taken."</p>	<p>We also recommend expansion of H07, to create a hotline or method of contact for building owners who are concerned about the effects of construction vibration on their buildings as works are undertaken to allay fears and allow the monitoring of effects. Whilst we understand that the anticipated effects of construction vibration on designated heritage assets are limited to the Grade II listed Little Bromley War Memorial (1493299) in Tendring District (which is not a dwelling) we would still recommend expansion of H07, to create a hotline or method of contact for building owners who are concerned about the effects of construction vibration on their buildings as works are undertaken to allay fears and allow the monitoring of effects</p> <p>Update to comments 6/5/26 Regarding H07, whilst we understand the calculated potential for adverse effects from construction vibration extends only to the listed Little Bromley War Memorial, we remain of the view that there should be a mechanism for reporting and investigating any concerns about the impact of construction effects by building owners and residents.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.</p>		
3.6.16	Standard mitigation (Archaeology)	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment (Revision B) [AS-068]</b> and set out in <b>7.2 Outline Code of Construction Practice [REP4-164]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p>	<p>Thurrock Council (Archaeology) agreed this matter during call held January 2026.</p>	Agreed
3.6.17	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 11.6 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment (Revision B) [AS-068]</b>. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>April 2025, The Applicant issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project.</p> <p>May 2026, following stakeholder feedback, the Applicant has re-issued an updated version of <b>7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]</b> with the intention that any further comments can be addressed and included for submission at Deadline 5.</p>	<p>We understand that no additional mitigation is proposed. It is agreed that in many cases, the introduction of measures such as additional planting to screen the proposed development in views from, towards and including built heritage assets would not be desirable where it would have the effect of curtailing or truncating views across an open agrarian landscape setting which contributes to the understanding of an asset's historic function and which helps reveal its architectural interest.</p> <p>The requirement for additional mitigation for archaeology is agreed. The effectiveness of this will depend on the methodologies proposed in the Outline AMS-WSI and so agreement on this document is key to achieving successful mitigation.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.	Thurrock Council noted during call in January 2026 that this matter is not relevant for Built Heritage.	
<b>EIA – Assessment Conclusions</b>				
3.6.18	Construction effects (Built Heritage)	The assessment of effects during construction is presented in Section 11.7 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment (Revision B) [AS-068]</b> . The assessment of effects during construction presented is considered appropriate.	This matter is agreed.	Agreed
3.6.19	Construction effects (archaeology)	The assessment of effects during construction is presented in Section 11.7 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment (Revision B) [AS-068]</b> . The assessment of effects during construction presented is considered appropriate.	This section is currently under review (Thurrock Council Archaeology) Email 4th Nov 2024 - Archaeology – consultants not assessing significant areas of 132 kV or 400kV cable undergrounding or overhead line tower locations intrusively prior to submission. Email 6th Nov 2024 – further discussion required regarding vibration assessments. Following review of the ES, TC confirmed agreement on this matter during call in January 2026.	Agreed
3.6.20	Operational (and maintenance) effects (Built Heritage)	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment (Revision B) [AS-068]</b> . The assessment of effects during operation (and maintenance) presented is considered appropriate. The Applicant is preparing the requested visualisations for Deadline 5 and has provided	With regards to the EIA Assessment Conclusions (3.6.12 and 3.6.13), Thurrock Council would expect that in due course the overall assessment of the harm to individual heritage assets arising from the scheme should be shown in the SoCG under Matters Agreed and Matters Not agreed (as applicable). Based on a desk based review of	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>further information at Deadline 4 about the assessment of the LoD in <b>8.17 Response to Rule 17 Letter - Historic Environment [REP4-318]</b> and 8.5.7 Applicant's Written Summary of Oral Submissions to Issue <b>Specific Hearing 2 [REP4-302]</b>. The Applicant will provide responses to ExQ2 and Deadline 4 submission from Interested Parties at Deadline 5.</p> <p>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.</p>	<p>the NG assessments for the Conservation Area and the Grade II* and Grade II listed buildings, the assessments of harm to significance are agreed.</p> <p>This matter is agreed.</p> <p>Update 1/5/26: This topic remains under discussion in light of questions raised by Ips and the ExA which were discussed at ISH 2 Landscape and Heritage on Wednesday 29 April 2026 regarding the Limits of Deviation (LoD) in the DCO, and the action arising to agree further viewpoint visualisations to demonstrate the potential impacts of the LoD on the setting of designated heritage assets.</p>	
3.6.21	Operational (and maintenance) effects (archaeology)	<p>The assessment of effects during operation (and maintenance) is presented in Section 11.7 of <b>6.11 Environmental Statement Chapter 11 - Historic Environment (Revision B) [AS-068]</b>. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p>	<p>Following review of the ES, Thurrock Council confirmed agreement on this matter during call in January 2026.</p>	Agreed
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.6.22	Outline CoCP	<p><b>7.2 Outline Code of Construction Practice [REP4-164]</b> includes all relevant construction mitigation measures specified in <b>6.11 Environmental Statement Chapter 11 - Historic Environment (Revision B) [AS-068]</b> and is appropriate for managing construction impacts from the Project.</p>	<p>In document <b>6.14 Environmental Statement Chapter 14 - Noise and Vibration</b> NG have identified the potential for damage to a total of five buildings or structures due to construction vibration from potential compaction activities. None of these are located in Thurrock.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>See 3.6.14 to 3.6.17 for current position.</p> <p>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.</p>	<p>No structures or buildings have been identified where there is the potential for damage from vibration from potential piling activities in any project section.</p> <p>(Built Heritage) See 3.6.14 for current position.</p> <p>This section is currently under review (Thurrock Council Archaeology). Further comments will be included within the LIR which require action.</p>	
<b>Other matters as required</b>				
3.6.23	<p>Overarching Written Scheme of Investigation (WSIs) for pre-consent geophysical surveys and archaeological trial trenching.</p>	<p>The Applicant shared overarching WSIs in March – June 2024 and December 2024.</p> <p>The scope and methodology of the overarching WSI for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.</p>	<p>The scope and methodology of the overarching WSI for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.</p>	Agreed
3.6.24	<p>Site specific Written Schemes of Investigation (WSIs) for pre-consent archaeological trial trenching.</p>	<p>The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.</p> <p>There are still addenda to site specific WSIs forthcoming that have yet to be issued.</p>	<p>The scope and methodology of WSIs for archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.6.25	Outline Archaeological Mitigation Strategy and Outline WSI.	<p>The contents of the Outline Archaeological Mitigation Strategy and Outline WSI (AMS-OWSI) is considered appropriate and proportionate to the level of evaluation required.</p> <p>April 2025, The Applicant issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI) for post-consent stage of the project.</p> <p>May 2026, following stakeholder feedback, the Applicant has re-issued an updated version of <b>7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]</b> with the intention that any further comments can be addressed and included for submission at Deadline 5.</p>	<p>The Outline AMS-WSI is currently not agreed, further comments will be provided in the Local Impact report (TC Archaeology).</p>	Under discussion
3.6.26	Programme for completion of archaeological fieldwork	<p>A summary of the progress to date and future programme for the archaeological evaluation fieldwork for the Project was presented in the technical note: 'Summary of Archaeological Fieldwork - Progress and Programme', issued on the 27 June 2025.</p> <p>A phased approach to archaeological evaluation is being undertaken. The Project has defined 'priority areas' on the basis of the likely scale of impact on archaeological remains, flexibility in design and construction programme. A proportion of the evaluation of 'priority areas' was complete at submission with the rest proposed to be completed pre examination. Evaluation of 'non priority areas' is proposed to be undertaken following completion of 'priority areas'.</p>	<p>The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.		
3.6.27	Supplementary Environmental Information	<p>The Applicant sought agreement on the approach to Supplementary Environmental Information in the technical note: 'Summary of Archaeological Fieldwork - Progress and Programme', issued on the 27 June 2025.</p> <p>Given the comments provided it is understood that Thurrock Council are in agreement with the part of the note that sets out the approach to supplementary information that will be provided for the DCO examination.</p>	Thurrock Council is in agreement with this matter.	Agreed

### 3.7 Hydrology, Land Drainage and Flood Risk

Table 3.7 Matters Agreed, Not Agreed or Under Discussion in Relation to Hydrology, Land Drainage and Flood Risk

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.7.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Hydrology, Land Drainage and Flood Risk assessment is presented in <b>6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]</b> and Section 9.2 of <b>6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]</b> .	The revisions to the sequential approach made in December 2024 have been considered as part of the FRA. All relevant legislation, policy and guidance has now been identified and appropriately considered to inform the assessment.	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.		
<b>EIA – Approach and Methods</b>				
3.7.2	Study area	The study area was agreed through the Applicant's <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and the <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.7.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 12.4 of <b>6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]</b> .	Sufficient desktop and survey data has been collected to inform the assessment.	Agreed
3.7.4	Assessment methodology	The methodology for assessing Hydrology, Land Drainage and Flood Risk was agreed through the Applicant's <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and the <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.	The methodology for assessing Hydrology, Land Drainage and Flood Risk was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.7.5	Key parameters and assumptions	Key parameters and assumptions associated with the Hydrology, Land Drainage and Flood Risk assessment are summarised in Section 12.4 of <b>6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]</b> . The key parameters and assumptions presented are considered appropriate.	At this stage the key parameter and assumptions presented are appropriate, however Thurrock Council will require site specific mitigation to be provided (covered in rows 3.7.7 to 3.7.9 below).	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<b>EIA – Baseline Conditions</b>				
3.7.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Hydrology, Land Drainage and Flood Risk are presented in Section 12.5 of <b>6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]</b>. The baseline conditions and receptors presented are considered appropriate.</p> <p>The Applicant submitted an updated SoCG with the Environment Agency at Deadline 1 (document <b>5.9.15 Draft Statement of Common Ground - Environment Agency [REP1-038]</b>), and will continue to update this SoCG and otherwise engage with the Environment Agency during the examination and beyond.</p>	<p>The baseline conditions and receptors presented are considered appropriate by Thurrock Council, but it is the responsibility of the Environment Agency to agree this.</p>	Agreed
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.7.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Hydrology, Land Drainage and Flood Risk effects, are set out in Section 12.6 of <b>6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]</b>. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>The Applicant met with Thurrock LLFA in April 2026 to further discuss mitigation for surface water flood risk (linked to comments received on <b>8.2 Drainage Strategy [REP1-072]</b>). After this meeting the Drainage Strategy was updated and was submitted at Deadline 4 <b>[REP4-186]</b>, inclusive of a new</p>	<p>Further to the submission of Thurrock's comment on <b>8.2 Drainage Strategy</b>, the applicant has responded to <b>comments as part of deadline 2'</b> in the following word:</p> <p><i>'To provide further clarity on this matter, the Applicant will produce a series of drainage layout figures for the Project to be appended to 8.2 Drainage Strategy which will be updated and submitted at a subsequent deadline.</i></p> <p><i>Commitment GG22 in 7.2 Outline Code of Construction Practice (Revision C), sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water</i></p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>appendix, <b>Appendix B [REP4-188]</b> that provides a series of drainage layout plans.</p> <p>On this basis of the further information submitted, the Applicant considers that this matter could be moved to Agreed.</p>	<p><i>Management Plan to inform discharge of Requirement 4 of the DCO</i>.</p> <p>LLFA acknowledged the above and await further information.</p> <p>Moreover, during a meeting held on 26 April, the applicant has confirmed that no timeline has been provided for the submission of the above documents.</p> <p>On this basis, the matter will be recorded as still under discussion</p>	
3.7.8	Standard mitigation	<p>Standard mitigation measures to reduce potential effects during construction are summarised in Section 12.6 of <b>6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]</b> and set out in <b>7.2 Outline Code of Construction Practice [REP4-164]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>The Applicant met with Thurrock LLFA in April 2026 to further discuss mitigation for surface water flood risk (linked to comments received on <b>8.2 Drainage Strategy [REP1-072]</b>). After this meeting the Drainage Strategy was updated and was submitted at Deadline 4 <b>[REP4-186]</b>, inclusive of a new appendix, Appendix B <b>[REP4-188]</b> that provides a series of drainage layout plans.</p> <p>On this basis of the further information submitted, the Applicant considers that this matter could be moved to Agreed.</p>	<p>Thurrock Council needs to see Site specific detail in order to determine if standard mitigation is appropriate and adequate.</p> <p>Further to the submission of Thurrock's comment on <b>8.2 Drainage Strategy</b>, the applicant has responded to <b>comments as part of deadline 2</b>' in the following word: <i>'To provide further clarity on this matter, the Applicant will produce a series of drainage layout figures for the Project to be appended to 8.2 Drainage Strategy which will be updated and submitted at a subsequent deadline.</i></p> <p><i>Commitment GG22 in 7.2 Outline Code of Construction Practice (Revision C), sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of Requirement 4 of the DCO</i>'</p> <p>LLFA acknowledged the above and await further information.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
			<p>Moreover, during a meeting held on 26 April, the applicant has confirmed that no timeline has been provided for the submission of the above documents.</p> <p>On this basis, the matter will be recorded as still under discussion</p>	
3.7.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 12.6 of <b>6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]</b> and set out in <b>7.2 Outline Code of Construction Practice [REP4-164]</b>. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>Additional site specific detail on how surface water runoff and land drainage will be managed and mitigated is also provided in <b>8.2 Drainage Strategy</b>, that was updated and submitted at Deadline 4 <b>[REP4-186]</b>, inclusive of a new appendix, Appendix B <b>[REP4-188]</b> that provides a series of drainage layout plans.</p> <p>On this basis of the further information submitted, the Applicant considers that this matter could be moved to Agreed.</p> <p>The assessment of inter-project cumulative effects between the Project and Lower Thames Crossing is provided on pages 10 – 15 of <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b>.</p>	<p>Thurrock Council needs to see Site specific detail in order to determine if additional mitigation is appropriate and adequate. Thurrock Council needs to understand the cumulative impacts of the project with regard to LTC.</p> <p>Further to the submission of Thurrock's comment on <b>8.2 Drainage Strategy</b>, the applicant has responded to <b>comments as part of deadline 2'</b> in the following word: <i>'To provide further clarity on this matter, the Applicant will produce a series of drainage layout figures for the Project to be appended to 8.2 Drainage Strategy which will be updated and submitted at a subsequent deadline.</i></p> <p><i>Commitment GG22 in 7.2 Outline Code of Construction Practice (Revision C), sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of Requirement 4 of the DCO'</i></p> <p>LLFA acknowledged the above and await further information.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
			<p>Moreover, during a meeting held on 26 April, the applicant has confirmed that no timeline has been provided for the submission of the above documents.</p> <p>On this basis, the matter will be recorded as still under discussion</p>	
<b>EIA – Assessment Conclusions</b>				
3.7.10	Construction effects	<p>The assessment of effects during construction is presented in Section 12.7 of <b>6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]</b>. The assessment of effects during construction presented is considered appropriate.</p> <p>The assessment of inter-project cumulative effects between the Project and Lower Thames Crossing is provided on pages 10 – 15 of <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b>.</p> <p>The Applicant is in regular engagement with Lower Thames Crossing, and the parties have prepared and submitted a SoCG to the examination (<b>8.3.4 Draft Statement of Common Ground - Lower Thames Crossing [REP4-195]</b>).</p> <p>The Applicant will provide the requested information and on this basis, aim to record this matter as agreed by Deadline 6.</p>	<p>As set out within the <b>Environmental Statement Chapter 17 – Cumulative Effects, Sections 17.5.53, 17.5.54 and 17.5.55</b> in reference to the potential impacts on hydrology, land drainage and flood risk, concluding that the cumulative effects are negligible and not significant.</p> <p>However, LLFA is not satisfied with this assessment. The applicant is required to undertake a more detailed evaluation of the combined impacts of the Lower Thames Crossing and N2T schemes across the full development footprint, during both the construction and operational phases and its impact on various sources of flood risk.</p> <p><b>Watercourses:</b></p> <p>Further to the comment raised by Thurrock LLFA during the meeting held on 26 April 2026, the applicant shall assess the cumulative impact on receiving watercourses, including:</p> <p>The combined <b>discharge of surface water</b> from multiple developments; and</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
			<p>The potential <b>hydro morphological impacts on channel banks</b>.</p> <p>In addition, the applicant is required to submit a plan clearly identifying the locations of both projects and to assess the cumulative flood risk within any overlapping areas of the two developments footprint.</p>	
3.7.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 12.7 of <b>6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]</b>. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p>The assessment of inter-project cumulative effects between the Project and Lower Thames Crossing is provided on pages 10 – 15 of <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b>.</p> <p>The Applicant is in regular engagement with Lower Thames Crossing, and the parties have prepared and submitted a SoCG to the examination (<b>8.3.4 Draft Statement of Common Ground - Lower Thames Crossing [REP4-195]</b>).</p> <p>The Applicant will provide the requested information and, on this basis, aim to record this matter as agreed by Deadline 6.</p>	<p>As ID3.7.10.</p> <p>As set out within the <b>Environmental Statement Chapter 17 – Cumulative Effects, Sections 17.5.53, 17.5.54 and 17.5.55</b> in reference to the potential impacts on hydrology, land drainage and flood risk, concluding that the cumulative effects are negligible and not significant.</p> <p>However, LLFA is not satisfied with this assessment. The applicant is required to undertake a more detailed evaluation of the combined impacts of the Lower Thames Crossing and N2T schemes across the full development footprint, during both the construction and operational phases and its impact on various sources of flood risk.</p> <p><b>Watercourses:</b></p> <p>Further to the comment raised by Thurrock LLFA during the meeting held on 26 April 2026, the applicant shall assess the cumulative impact on receiving watercourses, including:</p> <p>The combined <b>discharge of surface water</b> from multiple developments; and</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<p>The potential <b>hydro morphological impacts on channel banks</b>.</p> <p>In addition, the applicant is required to submit a plan clearly identifying the locations of both projects and to assess the cumulative flood risk within any overlapping areas of the two developments footprint.</p>				
<p><b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b></p>				
3.7.12	Outline CoCP (including Flood Warning and Evacuation Plan)	<p><b>7.2 Outline Code of Construction Practice [REP4-164]</b> includes all relevant construction mitigation measures specified in <b>6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]</b> and is appropriate for managing construction impacts from the Project.</p> <p><b>8.2 Drainage Strategy [REP1-072]</b> was submitted to the examination at Deadline 1 and revised at Deadline 4 <b>[REP4-186]</b>, inclusive of a new appendix <b>[REP4-188]</b> that includes a set of drainage plans.</p> <p>On this basis of the further information submitted, the Applicant considers that this matter could be moved to Agreed.</p>	<p>Further to the submission of Thurrock's comment on <b>8.2 Drainage Strategy</b>, the applicant has responded to <b>comments as part of deadline 2'</b> in the following word:</p> <p><i>'To provide further clarity on this matter, the Applicant will produce a series of drainage layout figures for the Project to be appended to 8.2 Drainage Strategy which will be updated and submitted at a subsequent deadline.</i></p> <p><i>Commitment GG22 in 7.2 Outline Code of Construction Practice (Revision C), sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of Requirement 4 of the DCO'</i></p> <p>LLFA acknowledged the above and await further information.</p> <p>Moreover, during a meeting held on 26 April, the applicant has confirmed that no timeline has been provided for the submission of the above documents.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
			On this basis, the matter will be recorded as still under discussion	
<b>Other matters as required</b>				
3.7.13	Flood Risk Assessment (FRA)	<p>The scope, methodology, assessment and conclusions drawn in <b>7.9 Flood Risk Assessment FRA [APP-331]</b> are considered appropriate and proportionate.</p> <p><b>Updated position (May 2026):</b></p> <p>The Applicant notes the comments raised by Thurrock Council and will undertake the following actions:</p> <ol style="list-style-type: none"> <li>1. Figures will be provided to highlight further details regarding this matter.</li> <li>2. Signposting to details on locations of compounds will be provided.</li> <li>3. Details regarding this point will be covered within the Drainage Strategy – see note below</li> <li>4. Excerpts of appropriate maps will be shared.</li> </ol> <p>The Applicant has engaged with the LLFA to discuss and resolve the comments provided on the Applicant's Drainage Strategy <b>8.2 Drainage Strategy DCO [REP1-072]</b> submitted at Deadline 1, and revised at Deadline 4 <b>[REP4-186]</b>, inclusive of a new appendix <b>[REP4-188]</b> that includes a set of drainage plans.</p> <p>On receipt of review of the items of information described above, the Applicant considers that this matter could be moved to Agreed.</p>	<p>The flood risk for planning map has been updated in March 2025. Please ensure that Chapter 12 of the ES is updated with the current information.</p> <p>Due consideration for sequential approach shall be enumerated as part of the assessment in line with the revised NPPF as of December 2024.</p> <p>Thurrock Council requires the following details in order to consider if the FRA is appropriate and proportionate:</p> <ol style="list-style-type: none"> <li>1. Ordinary water courses pg 41 of 6.12. The Methodology is acceptable however we require more detail as to where they are located.</li> <li>2. Locations of compounds and installations</li> <li>3. Proposed surface water measures – We agree with the general measures in the FRA – pg45 but more detail of individual sites and calculations is required as part of the drainage strategy.</li> <li>4. Maps provided for high and medium risk are not clear.</li> </ol> <p>Further to the submission of Thurrock's comment on <b>8.2 Drainage Strategy</b>, the applicant has responded to <b>comments as part of deadline 2'</b> in the following word:</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
			<p><i>'To provide further clarity on this matter, the Applicant will produce a series of drainage layout figures for the Project to be appended to 8.2 Drainage Strategy which will be updated and submitted at a subsequent deadline.</i></p> <p><i>Commitment GG22 in 7.2 Outline Code of Construction Practice (Revision C), sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of Requirement 4 of the DCO'</i></p> <p>LLFA acknowledged the above and await further information.</p> <p>Moreover, during a meeting held on 26 April, the applicant has confirmed that no timeline has been provided for the submission of the above documents.</p> <p>On this basis, the matter will be recorded as still under discussion.</p>	

### 3.8 Landscape and Visual

Table 3.8 Matters Agreed, Not Agreed or Under Discussion in Relation to Landscape and Visual

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.8.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Landscape and Visual assessment is presented in <b>6.2</b>	All relevant legislation, policy and guidance have been considered.	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p><b>Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]</b> and Section 13.2 of <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>.</p> <p>All relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment.</p>		
<b>EIA – Approach and Methods</b>				
3.8.2	Study area	<p>The study area for assessing Landscape and Visual was agreed through the Applicant's <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and the <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate and through subsequent thematic workshops.</p>	<p>Thurrock Council confirmed in a meeting to discuss the Statement of Common Ground in January 2026 that this matter can be agreed</p>	Agreed
3.8.3	Data sources	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within <b>Section 13.4 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>.</p> <p>Both parties agreed that this matter can be changed to agreed in a meeting on 1<sup>st</sup> June 2026 providing that the information around viewpoints is captured as a separate matter (refer to ID 3.8.4).</p>	<p>Both parties agreed that this matter can be changed to agreed in a meeting on 1<sup>st</sup> June 2026 providing that the information around viewpoints is captured as a separate matter (refer to ID 3.8.4).</p>	Agreed
3.8.4	Assessment methodology (including LVIA methodology and viewpoints)	<p>The outline methodology for assessing Landscape and Visual was agreed through the Applicant's <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and the <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.</p>	<p>Thurrock Council have identified that a visualisation from the footpath running through the golf course (footpath 45) closer to the order limits is required. Cumulative visualisations illustrating the Tilbury North Substation with LTC is required.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>Meetings were held on 25 September 2024 to seek to agree the detailed methodology as well as the number and location of viewpoints.</p> <p>In March 2025 the Applicant issued an update on the Landscape and Visual Impact Assessment (LVIA) Viewpoints and Methodology.</p> <p>Both parties agreed in a meeting on 1<sup>st</sup> June 2026 that this matter was still under discussion pending further conversation on the requested viewpoint, and whether details can be extracted or reviewed from an existing viewpoint on LTC.</p>		
3.8.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Landscape and Visual assessment are summarised in Section 13.4 of <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>. The key parameters and assumptions presented are considered appropriate.</p>	Agreed.	Agreed
<b>EIA – Baseline Conditions</b>				
3.8.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Landscape and Visual are presented in Section 13.5 of <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>. The baseline conditions and receptors presented are considered appropriate.</p> <p>Both parties agreed that this matter can be changed to agreed in a meeting on 1<sup>st</sup> June 2026 providing that the information around viewpoints is captured as a separate matter (refer to ID 3.8.4).</p>	<p>Both parties agreed that this matter can be changed to agreed in a meeting on 1<sup>st</sup> June 2026 providing that the information around viewpoints is captured as a separate matter (refer to ID 3.8.4).</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.8.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Landscape and Visual effects, are set out in Section 13.6 of <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> . Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Agreed	Agreed
3.8.8	Standard mitigation	Standard mitigation measures to reduce potential Landscape and Visual effects during construction are summarised in Section 13.6 of <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> and set out in <b>7.2 Outline Code of Construction Practice [REP4-164]</b> . The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Agreed	Agreed
3.8.9	Additional mitigation	<p>The consideration of additional mitigation measures is presented in Section 13.6 of <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>.</p> <p>No additional mitigation measures, beyond the embedded and standard measures identified, are proposed for landscape and visual.</p> <p>Both parties agreed that this matter remains under discussion in a meeting on 1<sup>st</sup> June 2026 as further review is required of the Outline LEMP that will be submitted at Deadline 5.</p>	Mitigation planting should be considered along the footpath running along the northern boundary of the site. The option of mitigation planting within the Order Limits to the south of the substation and pylons, in the space between High House Lane and Hoford Road should be explored. The visualisation from High House Lane (Viewpoint 8.05: PRoW east of Chadwell St Mary (No 78)) shows views towards the proposals and mitigation planting in this area could soften those views of both Tilbury North Substation and LTC.	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
			A clearer understanding of proposed planting within the Thurrock area should be provided to ensure all planting removed within Thurrock is adequately mitigated and compensated. It should be made clear what is mitigation planting, compensation planting and enhancement.	

### EIA – Assessment Conclusions

3.8.10	Construction effects	The assessment of effects during construction is presented in Section 13.7 of <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> . The assessment of effects during construction presented is considered appropriate.  Both parties agreed that this matter can be changed to agreed in a meeting on 1 <sup>st</sup> June 2026 providing that the information around viewpoints is captured as a separate matter (refer to ID 3.8.4).	Both parties agreed that this matter can be changed to agreed in a meeting on 1 <sup>st</sup> June 2026 providing that the information around viewpoints is captured as a separate matter (refer to ID 3.8.4).	Agreed
3.8.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 13.7 of <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> . The assessment of effects during operation (and maintenance) presented is considered appropriate.  Both parties agreed that this matter can be changed to agreed in a meeting on 1 <sup>st</sup> June 2026 providing that the information around viewpoints is captured as a separate matter (refer to ID 3.8.4).	Both parties agreed that this matter can be changed to agreed in a meeting on 1 <sup>st</sup> June 2026 providing that the information around viewpoints is captured as a separate matter (refer to ID 3.8.4).	Agreed

### Draft DCO / Outline Management Plans / Mitigation and Monitoring

3.8.12	Outline CoCP	<b>7.2 Outline Code of Construction Practice [REP4-164]</b> includes all relevant construction	Thurrock Council confirmed in a meeting to discuss the Statement of Common Ground	Agreed
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ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		related mitigation measures specified in <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> and is appropriate for managing construction impacts from the Project.	on 29 <sup>th</sup> January 2026 that this matter can be agreed. Thurrock noted that mitigation outside the order limits would not be possible and are content with this.	
3.8.13	Outline LEMP	<p><b>7.4 Outline Landscape and Ecological Management Plan [Revision E]</b> includes all relevant operational related mitigation measures specified in <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b> and is appropriate.</p> <p>Both parties agreed that this matter remains under discussion in a meeting on 1<sup>st</sup> June 2026 as further review is required of the Outline LEMP that will be submitted at Deadline 5.</p>	Further details illustrating the proposed landscape strategy should be provided. They should include the new location for the woodland compensation planting associate with the LTC. The landscape strategy should describe how the ancient woodland compensation planting associated with LTC can still achieve the objectives set out in the LTC EIA. The LEMP should clearly state what is mitigation planting, compensation planting and enhancement.	Under discussion

Other matters as required

### 3.9 Socio-economics, Recreation and Tourism

Table 3.9 Matters Agreed, Not Agreed or Under Discussion in Relation to Socio-economics, Recreation and Tourism

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.9.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Socio-economics, Recreation and Tourism assessment is presented in <b>6.2 Environmental Statement Chapter 2 - Key</b>	Thurrock Council considers that the relevant legislation, policy and guidance have been identified and appropriately considered.	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p><b>Legislation and Planning Policy Context [APP-126]</b> and Section 15.2 of <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p>		
<b>EIA – Approach and Methods</b>				
3.9.2	Study area	<p><b>6.20 Scoping Opinion [APP-297]</b> stated: “The Applicant should seek to agree the study area with the relevant local authorities”.</p> <p>A meeting was held on 14 November 2024 to seek to agree this point in the Scoping Opinion. Technical Notes were shared in June 2023 and April 2024.</p> <p>Following the meeting held on 14 November 2024, it was agreed that the study area for businesses would be expanded from 1km to 3km to take into account potential visual effects on businesses.</p> <p>A 3rd Technical Note was issued in March 2025 to seek to agree the study area and methodology.</p>	<p>E-mail from Thurrock Council dated 6th May 2025:</p> <p>Thurrock Council is in agreement with the study area and assessment criteria for socio-economics, recreation and tourism as laid out in the technical note received on 28 March 2025.</p>	Agreed
3.9.3	Data sources	<p>Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 15.2 of <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>.</p>	<p>Thurrock Council considers that sufficient desktop and survey data has been collected.</p>	Agreed
3.9.4	Assessment methodology	<p><b>6.20 Scoping Opinion [APP-297]</b> stated “<i>The Applicant should seek to agree the study area with the relevant local authorities</i>” and “<i>The ES should detail the criteria used to identify busin</i>”</p>	<p>E-mail from Thurrock Council dated 6th May 2025:</p> <p>Thurrock Council is in agreement with the study area and assessment criteria for socio-economics, recreation and tourism as laid out</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p><i>sses likely to be affected and the Applicant should seek to agree these with relevant local authorities”.</i></p> <p>A meeting was held on 14th November 2024 to seek to agree this point in the Scoping Opinion. Technical Notes were shared in June 2023 and April 2024.</p> <p>A 3rd Technical Note was issued in March 2025 to seek to agree the study area and methodology.</p>	<p>in the technical note received on 28th March 2025.</p>	
3.9.5	Key parameters and assumptions	<p>Key parameters and assumptions associated with the Socio-economics, Recreation and Tourism assessment are summarised in Section 15.4 of <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>. The key parameters and assumptions presented are considered appropriate.</p>	<p>The key parameters and assumptions presented are considered appropriate.</p>	Agreed
<b>EIA – Baseline Conditions</b>				
3.9.6	Baseline conditions and receptors	<p>The baseline conditions and receptors for Socio-economics, Recreation and Tourism are presented in Section 15.5 of <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>. The baseline conditions and receptors presented are considered appropriate.</p>	<p>The baseline conditions and receptors presented are considered appropriate.</p>	Agreed
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.9.7	Embedded mitigation	<p>Embedded mitigation measures, designed as an inherent part of the Project relevant to Socio-economics, Recreation and Tourism effects, are set out in Section 15.6 of <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>. Embedded mitigation is considered appropriate and adequate,</p>	<p>Thurrock Council has outstanding concerns about the impact on businesses and raised the need for clear communication.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>in terms of its nature and scale, to address potential effects. In response to concerns raised around clear communication, the Applicant is developing a Communications Strategy/Complaints protocol as part of the final CoCP.</p> <p>Please see ID3.9.8 below in response to the point about the concerns about impact on businesses.</p>		
3.9.8	Standard mitigation	<p>Standard mitigation measures to reduce potential Socio-economics, Recreation and Tourism effects during construction are summarised in Section 15.6 of <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b> and set out in <b>7.2 Outline Code of Construction Practice [REP4-164]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>The financial effects on individual businesses are being addressed through separate discussions / negotiations which lie outside the scope of the ES (as agreed in <b>6.20 Scoping Opinion [APP-297]</b>). Therefore, the financial effects on individual businesses was not assessed in <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>.</p>	<p>Thurrock Council expects the applicant to review the types of businesses and community facilities impacted and the access required by those businesses, and to take responsibility for ensuring appropriate mitigation to avoid impact to people's livelihoods and wellbeing.</p> <p>Standard mitigation should include targeted grants for Orsett Golf Course, Thurrock Rugby Football Club, Langdon Hills GC, Dunton Hills Family Golf Centre, affected PRowS and cycling routes—covering temporary loss of amenity, alternative provision, extra staffing, marshalling, pitch reinstatement, turf repairs, and replacement of worn surfaces post-construction.</p>	Under discussion
3.9.9	Additional mitigation	<p>The consideration of additional mitigation measures are presented in Section 15.6 of <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>. Additional mitigation is considered appropriate and</p>	<p>Thurrock Council expects the applicant to review the types of businesses and community facilities impacted and the access required by those businesses, and to take responsibility for ensuring appropriate</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>adequate, in terms of its nature and scale, to address potential effects.</p> <p>The financial effects on individual businesses are being addressed through separate discussions / negotiations which lie outside the scope of the ES (as agreed in <b>6.20 Scoping Opinion [APP-297]</b>). Therefore, the financial effects on individual businesses was not assessed in <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>.</p>	<p>mitigation to avoid impact to people's livelihoods and wellbeing.</p> <p>Additional mitigation measures should include an events support budget for costs to re-route or steward club fixtures, tournaments, fun-runs, and community days that clash with construction phases.</p>	
<b>EIA – Assessment Conclusions</b>				
3.9.10	Construction effects	<p>The assessment of effects during construction is presented in Section 15.7 of <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>. The assessment of effects during construction presented is considered appropriate.</p> <p>The comment from Thurrock Council is a direct quote from <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>. The Applicant awaits further comment on this matter.</p>	<p>15.7.6 Until contracts are let for the construction work, it is not possible to know how much of the construction spend would be within the local economy (i.e. Wider Study Area). Given that much of the spend is anticipated to go to specialist contractors who may not be based in the local area, it is expected that direct impacts would be very low to low beneficial at best.</p>	Agreed
3.9.11	Operational (and maintenance) effects	<p>The assessment of effects during operation (and maintenance) is presented in Section 15.7 of <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>. The assessment of effects during operation (and maintenance) presented is considered appropriate.</p> <p>The <b>7.6 Outline Public Rights of Way Management Plan [REP4-178]</b> sets out the proposed management measures for each affected</p>	<p>It is important that recreational routes and green spaces remain accessible to all, including wheelchair and pushchair users.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>recreational route and Open Access Land, and specifies that the four types of PRow are for different types of users, including wheelchair and pushchair users. The proposed management measures apply for each affected PRow, i.e. where wheelchair users and mobility scooters will be using.</p>		
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.9.12	Outline CoCP	<p><b>7.2 Outline Code of Construction Practice [REP4-164]</b> includes all relevant construction related mitigation measures specified in <b>6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]</b>, and is appropriate for managing construction impacts from the Project.</p> <p>Communication method will be detailed in the final CoCP during the discharge of requirements and detailed design stage.</p> <p>On inclusive engagement measures, please see the Applicant's responses to the Examining Authority's questions, including to questions HW 1.3 and HW 1.9, which is found in <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>. The Applicant's approach to engagement for the construction phase is currently outlined in <b>7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [REP4-168]</b>, which confirms that the Project website will be maintained and managed by a community relations team to enable up-to-date information to be provided to stakeholders, including provision of Project updates, information relating to</p>	<p>A 24-hour emergency number (staffed or redirected) should be available for businesses and the public if issues arise with the works. This number should be made available to the Council's Emergency Planning Team together with a copy of the constructor's (when appointed) own Business Continuity Plan.</p> <p>Confirmation is required that the applicant will communicate any temporary closures or diversions in multiple formats (e.g. easy read, translated), and of how they will do this.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>a free Project hotline, Project email and freepost address, publication of Project contact details in newsletters, and provision of the same details on boards around the perimeter of construction sites in locations where they would be visible to the public. On request, the Applicant will consider providing materials in alternative formats. The Applicant's approach is considered to be proportionate and appropriate, taking into account communication needs of local communities and setting out both digital and non-digital methods of communication to assist with harder-to-reach parties who may not have access to digital means and to address inequalities created through language.</p>		
<b>Other matters as required</b>				

### 3.10 Traffic and Transport

Table 3.10 Matters Agreed, Not Agreed or Under Discussion in relation to Traffic and Transport

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.10.1	Policy and legislation	<p>All relevant transport strategy, policy and guidance was reviewed and agreed by Thurrock Council following their review of the Draft Transport Assessment in February 2025.</p> <p>The Thurrock Local Transport Plan Vision 2050 was reviewed but was not explicitly referenced within the <b>7.11 Transport Assessment [APP-333]</b> as the vision establishes a broader long-term plan for transport in Thurrock and it is not relatable to the Project due to the temporary nature of the impact.</p> <p>The Emerging Thurrock Transport Strategy 2026-2040 was published in November 2025 and was still under consultation until February 2026, i.e. after the Project's application for development consent. The Applicant will continue to engage with Thurrock Council to understand any impact to the assessment of the Primary Access Routes related to the goals and major schemes provided within the Emerging Thurrock Transport Strategy 2026-2040.</p>	<p><i>Latest Position from Local Impact Report February 2026</i></p> <p>Reference made to Thurrock Transport Strategy 2013-2026 but not to the emerging Thurrock Transport Strategy 2026-2040 (to be adopted mid-2026). Also, no references to Thurrock Local Transport Plan Vision 2050. To be interrogated and determined if this has an influence on the proposals.</p>	Under discussion
<b>EIA – Approach and Methods</b>				
3.10.2	Study area	<p>The study area was agreed through the Applicant's <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and the <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.</p>	<p>The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.10.3	Data gathering (1)	<p>Within the Thurrock Council area there are a limited number of PARs, therefore survey data collection was not as extensive. PARs were presented to Thurrock Council at Thematic Group Meetings and traffic survey data was either obtained from online DfT counts or collected in appropriate locations on the PAR where it was safe for operatives to install equipment. For junctions, MCC data was collected for modelling or use of junction models prepared by Lower Thames Crossing which was agreed by Thurrock Council. This information was used for our assessment within <b>7.11 Transport Assessment [APP-333]</b> and <b>6.16 Environmental Statement - Chapter 16 Traffic and Transport [APP-271]</b>. PRoW surveys within the Thurrock Council area were undertaken following engagement with the PRoW officers.</p> <p>Traffic survey data was collected on PARs and junctions along PARs at locations where no recent survey data was available, including ATC surveys and MCC surveys. User surveys were undertaken on PRoWs, including footpaths: FP 91,FP 84, FP81, FP11, FP12; bridleway: BR 63; and Hoford Road (NMU route). These locations were identified through engagement with Thurrock Council highways and PRoW officers.</p>	<p><i>Latest Position from Local Impact Report February 2026</i></p> <p>Data gathering (ES/TA) - Limited surveys/primary data collection undertaken within the Thurrock road network (see Fig 16.4 pages 29 and 30: one ped count and one traffic count on A128, one junction count at site access 85, four PROW survey sites on pedestrian route). Existing models used in assessment should be validated against primary data.</p>	Under discussion
3.10.4	Data Gathering (2)	<p>The Applicant confirms that Department for Transport (DfT) 2023 counts have been used within the <b>6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]</b> and within <b>7.11 Transport Assessment [APP-333]</b>, supplemented by ATC surveys. This represents the most up-to-</p>	<p>Latest Position from Local Impact Report February 2026</p> <p><i>"Data gathering: ES paragraph 16.5.4 states that, for links where DfT traffic flows were not available, traffic flows were collected by the Project Team in 2023, November 2024 and</i></p>	Under Discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>date information available at the time and DfT 2019 counts were not used.</p> <p>Within the Thurrock Council area, DfT 2023 count data was used for PAR 64 A1013 Stanford Road (east of Orsett Cock roundabout). ATC surveys were undertaken in November 2023 on PAR 63 A128 Brentwood Road and PAR 65 Buckingham Hill Road and in November 2024 on PAR 71 Muckingford Road. ATC survey data obtained from the Lower Thames Project Team for June 2024 was used for PAR 66 Brentwood Road, PAR 67 A1013 Stanford Road (west of Orsett Cock roundabout), PAR 68 Heath Road and PAR 70 Linford Road. This approach ensured that the baseline data used within the transport assessments captured post-pandemic traffic patterns.</p>	<p><i>May 2025. ES Appendix 16.1 - Engagement Undertaken Relevant to Traffic and Transport (Transport Working Group Regional Meeting (Thurrock), September 2023) confirms that 2019 DfT data was used and supplemented by November 2023 traffic count surveys, plus additional traffic surveys were undertaken near to 'several' DfT count sites. Further traffic counts were undertaken in November 2024. While the commentary implies primary traffic data sourcing, the number and location of the additional traffic count data is unclear."</i></p>	
3.10.5	Data key parameters and assumptions	<p>The estimation of the future baseline flows has followed standard methodology and relevant guidelines including WebTAG<sup>1</sup> and IEMA Guidelines: Environmental Assessment of Traffic and Movement<sup>2</sup>. Paragraph 16.4.32 of <b>6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]</b> refers to the use of DfT's static traffic counters to inform baseline traffic flows obtained from traffic counts undertaken in 2023 This does not represent the sole data source. As clarified in paragraph 16.5.3 and 16.5.4, baseline traffic conditions are informed by both DfT traffic data and project-specific traffic counts undertaken in</p>	<p>Latest Position from Local Impact Report February 2026</p> <p><i>"Key Parameters and assumptions - ES paragraph 16.4.32 reiterates 2023 traffic flows were gathered via Department for Transport (DfT) static traffic counters and used to establish future baseline (start of construction activities from 2027). Re-iterating, absence of primary source data for robust assessment of future baseline traffic flows."</i></p>	Under discussion

<sup>1</sup> Department for Transport (2025) *WebTAG*

<sup>2</sup> Institute of Environmental Management and Assessment (IEMA) (2023) *IEMA Guidelines: Environmental Assessment of Traffic and Movement*

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>November 2023, June 2024 and November 2024 where DfT counts are not available.</p> <p>These datasets were used in combination to provide coverage of the affected network to estimate the future baseline for the worst-case peak construction year for each PAR by applying an appropriate growth factor derived from TEMPro NTEM dataset v7.2. For committed developments that were not already considered within the TEMPro growth factor, the anticipated construction/operation flows were included within the future baseline.</p> <p>The Applicant considers that this approach, which combines established national datasets with site-specific survey data, provides a robust and proportionate basis for the assessment of future baseline traffic flows.</p>		
3.10.6	Assessment methodology	<p>Section 16.10 within <b>6.19 Scoping Report [APP-296]</b> details the methodology for the Traffic and Transport Environmental Assessment for the Project. This followed the IEMA 1993 guidelines, the latest guidelines at the time.</p> <p>The IEMA Guidelines were updated in 2023, after the <b>6.19 Scoping Report [APP-296]</b></p> <p>Subsequent to the submission of <b>6.19 Scoping Report [APP-296]</b> in 2022, it was raised by all LHAs that the updated IEMA 2023 guidelines should be used to assess the traffic and transport environmental effects.</p> <p>Therefore, <b>6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]</b> follows the</p>	<p>Scoped in/scoped out details only in the scoping document, no methodology for assessment within scoping report. Does it follow 2023 ES guidance?</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		latest IEMA 2023 guidance, as set out in Paragraphs 16.2.20, 16.4.19 and 16.4.21.		
<b>EIA – Baseline Conditions</b>				
3.10.7	Baseline conditions and receptors	<p>The baseline conditions and receptors for Traffic and Transport are presented in <b>6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]</b>. The baseline conditions and receptors presented are considered appropriate. Yes, the estimation of future baseline flows in particular, it followed standard methodology / guidelines, including WebTAG (2025) and IEMA Guidelines: Environmental Assessment of Traffic and Movement (2023). This is set out in paragraph 16.4.21 in Section 16.4 of <b>Chapter 16 (Traffic and Transport)</b> of the <b>ES [APP-271]</b>.</p> <p>The assessment within the <b>6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]</b> was prepared using the latest IEMA 2023 guidance. This is set out in paragraph 16.4.21 in Section 16.4 of <b>Chapter 16 (Traffic and Transport)</b> of the <b>ES [APP-271]</b>. Sensitivity of roads forming PARs and identified sensitive receptors were reviewed by Thurrock Council and the ES assessment was updated to reflect this Thurrock Council's comments provided in meeting held in March 2025. The road sensitivity along with the basis for sensitivity for each road link is presented in Tables A16.2.78 and A16.2.79 of the <b>6.16.A2 Environmental Statement Appendix 16.2</b></p>	Do baseline conditions these correspond with accepted practice and latest guidance?	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>- Traffic and Transport Baseline Conditions [APP-273].</p>		
3.10.8	Primary Access Routes	<p>The Applicant's proposed routing and strategy for access in Thurrock has been informed by regular engagement with the Local Highway Authority, since 2023, as summarised within the Transport Assessment record of engagement <b>7.11 Transport Assessment – Appendix B – Consultation on the Scope of the Assessment [APP-335]</b>. Stakeholder feedback on specific Primary Access Routes was recorded during a regional meeting with Thurrock held on 19<sup>th</sup> March 2024.</p> <p>Additionally, <b>Section 9.6 and Table 9-9</b> of the <b>Consultation Report [APP-066]</b> summarise stakeholder feedback from Thurrock during the 2024 statutory consultation. Traffic and access were identified as key issues. The report demonstrates that these were recorded and responded to by National Grid, with outcomes informing the Scheme design and associated mitigation, including the <b>Transport Assessment [APP-335]</b> and <b>Outline Construction Traffic Management Plan [REP4-174]</b>.</p> <p>The Applicant has conducted a rigorous assessment process to identify the most suitable roads for use as Primary Access Routes for vehicles to use to travel between the Strategic Road Network / Major Road Network, and the works areas. This has included consideration of constraints, swept path analysis, proposals for highway mitigation works where identified to be necessary, and continued engagement with the Local Highway Authority.</p>	<p>Latest Position from Local Impact Report February 2026:</p> <p><i>“Vehicle Routeing: the Council have requested further validation that the Primary Access Routes (PAR) selected to confirm these acceptable in terms of highways design and capacity assessments.”</i></p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>The <b>7.11 Transport Assessment [APP-333]</b> provides the assessment of the junctions along the Primary Access Routes. Where required, mitigation measures have been provided to reduce any severe residual cumulative impacts.</p>		
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.10.9	Embedded mitigation	<p><b>7.2 Outline Code of Construction Practice [REP4-164], 7.3 Outline Construction Traffic Management Plan (Revision C) [REP4-174], and 7.6 Outline Public Rights of Way Management Plan [REP4-178]</b> detail the additional mitigation that is proposed as part of the scheme, following the assessments. <b>7.3 Outline Construction Traffic Management Plan (Revision C) [REP4-174]</b> includes embedded mitigation such as temporary haul roads (to remove vehicular traffic from the highway), which has been developed through the design of the scheme.</p> <p>The Applicant issued in February 2026 additional information requested by Thurrock Council, and the Applicant held a meeting with Thurrock Council in March 2026 to discuss these Stage 1 Road Safety Audit Designer Responses, including discussion around additional pedestrian crossing facilities in select mitigation locations.</p>	<p>Mitigation measures should include traffic management and controls and construction management principles. Embedded mitigation measures picked up through scheme following S1 RSA. Other mitigation evidenced through LHA dialogue such as additional pedestrian crossing facilities requested.</p>	Under discussion
3.10.10	Standard mitigation	<p><b>7.3 Outline Construction Traffic Management Plan (Revision C) [REP4-174]</b> includes details of the proposed mitigation measures. The <b>7.11 Transport Assessment [APP-333]</b> provides additional information on the process to identifying these mitigation measures. These mitigations</p>	See comments for CTMP below	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		measures are considered appropriate. Thurrock Council is reviewing additional information that has been provided by the Applicant.		
3.10.11	Additional mitigation	Additional Mitigation measures are detailed in <b>7.3 Outline Construction Traffic Management Plan (Revision C) [REP4-174]</b> and include items such as the Driver Information Pack and driver briefing, and travelling outside of the school hours for certain routes.	See comments for CTMP below	Under discussion
<b>EIA – Assessment Conclusions</b>				
3.10.12	Construction effects	The assessment of effects during construction is presented in Section 16.7 (Residual Effects) of <b>6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]</b> . The assessment of effects during construction presented is considered appropriate. National Grid will continue to engage with Thurrock Council on this matter.	Verification required if this is accepted practice.	Under discussion
3.10.13	Construction effects – bus passenger delay	The moderate to large significant effects in relation to public transport delay relate directly to the large cumulative volumes of construction traffic from both the Lower Thames Crossing and the Project, and the impact these have on the operation of the Orsett Cock roundabout. Coordination and collaboration with the LTC Transport Team is ongoing regarding the combined impact of the Projects and mitigation at the Orsett Cock Roundabout. The Applicant will engage with Thurrock to present these findings. <b>7.3 Outline Construction Traffic Management Plan (Revision C) [REP4-174] 7.3 Outline</b>	<i>Latest Position from Local Impact Report February 2026: “While the assessment identifies moderate to large significant effects in relation to public transport delay on a number of Primary Access Routes during the construction phase, further consideration is required in respect of the implications for local bus services and the adequacy of the mitigation proposed through the CTMP.”</i>	Under Discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p><b>Construction Traffic Management Plan [APP-309]</b> sets out mitigation measures to minimise potential impacts on public bus services.</p> <p>The Applicant will make effort to work with local bus operators, including school bus operators to ensure disruption is minimised. If a bus stop is located on a road proposed for temporary closure, a temporary stop would be provided, following agreement with the Local Highway Authorities and the bus operators.</p> <p><b>7.11 Transport Assessment [APP-333]</b> details that any expected short-term impacts (less than four-week duration) on bus networks will be mitigated on a case-by-case basis, through liaison with bus operators and the Local Highway Authority.</p> <p>The Applicant anticipates this detail will be coordinated by the Main Works Contractor(s) in their development of the final Construction Traffic Management Plan.</p>		
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.10.14	Outline CoCP	<p>The <b>7.2 Outline Code of Construction Practice [REP4-164] Outline CoCP [APP-300]</b> includes all relevant construction related mitigation measures specified in <b>6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]</b> and is appropriate for managing construction impacts from the Project.</p> <p>Meeting held on 9th October to agree on the structure for the <b>Outline CoCP [APP-300]</b>.</p> <p>The Applicant will continue to engage with Thurrock Council on this matter.</p>	Details commented upon below – may require amendments to wording within the ES chapter.	Under discussion

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<b>Transport Assessment (TA) – Regulatory, Planning Policy Context and Guidance</b>				
3.10.15	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Traffic and Transport assessment is presented in Chapter 3 of the <b>7.11 Transport Assessment [APP-333]</b> . All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	Noted For consideration in light of comments at 3.10.1	Under discussion
<b>Transport Assessment – Approach and Methods</b>				
3.10.16	Study Area	Additional information requested by Thurrock Council was issued by the Applicant in February 2026, and the Applicant held additional meetings with Thurrock Council in February and March 2026 to discuss these topics further.	Awaiting additional information following the February 2025 meeting. Evidence of discussion with LHA regarding local junctions/corridors which may require particular focus for impact assessment. Meeting notes required for review. A number of points were raised in this meeting to which further information was to be provided by National Grid.	Under discussion
3.10.17	Multimodal Strategy	Use of rail and waterborne modes was assessed as part of a Multi-Modal assessment undertaken by the Applicant which identified options for the reduction of distances travelled by commercial vehicles on the SRN in the delivery of the Project. A report is included in <b>7.11 Transport Assessment – Appendix G – Multi-Modal Transport Report [APP-340]</b> and the assessment of the multi-modal scenario is included within Section 7.8 of <b>7.11 Transport Assessment [APP-333]</b> . Junction modelling was undertaken for the multi-model assessment as part of sensitivity testing. Two	A number of points were raised in meetings to which further information was to be provided by National Grid and additionally concern was raised about double handling of materials. No sufficient evidence provided whether rail and waterborne modes were sufficiently assessed, considered or agreed with LHA.	Under discussion

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		<p>scenarios were assessed: Scenario 1 – ‘just in time’ delivery profile (no stock piling) and Scenario 2 – ‘front-loaded’ delivery profile. This included an assessment of the Asda Roundabout assuming delivery of materials from the Port of Tilbury. Modelling assessments for the multi-modal sensitivity testing are included within Section 7.7 and Section 7.11 of <b>7.11 Transport Assessment [APP-333]</b>.</p> <p>Additional information requested by Thurrock Council was issued by the Applicant in February 2026, and the Applicant held additional meetings with Thurrock Council in February and March 2026 to discuss these topics further.</p>		
3.10.18	Junction Capacity Assessment Methodology	<p>Additional information requested by Thurrock Council was issued in February 2026, and the Applicant held additional meetings with Thurrock Council in February and March 2026 to discuss these topics further.</p>	<p>A number of points were raised in meetings to which further information was to be provided by National Grid.</p> <p>Comments from meetings are required for better understanding of outcomes/discussions.</p> <p>Traffic impact assessment/junction modelling was done at four junctions, three on the SRN and one on the LRN. Two scenarios for FY+scheme were tested, with varying rates of delivery/trips to site. This is acceptable.</p> <p>Survey data was only collected for the modelling of the LRN junction. The modelling of the SRN junctions was done using DfT traffic data as well as data from the LTC model, which was factored using DfT data. This methodology raises concerns over the usability of the generated traffic flows. The</p>	Under discussion

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			<p>data used is potentially inaccurate, generalised and outdated. This is particularly relevant as results for two of the SRN junctions show high levels of congestion in FY scenarios. Traffic surveys are needed at the SRN junctions to collect accurate baseline data and assess FY impacts.</p> <p>No modelling of SAP junctions was undertaken despite some of the SAPs proposed to experience high traffic volumes (more than a vehicle per minute). Similarly, no assessment of PAR corridor capacity was undertaken, nor were flow diagrams of likely traffic distribution provided. This would be helpful to consider if other junctions may also be impacted by the scheme.</p>	
3.10.19	Junction Modelling	<p>The construction trip generation methodology was updated between 2024 statutory consultation stage and the submission of the development consent application, due to additional information becoming available from the technical teams. The Applicant has undertaken a robust trip generation and assessment exercise for both the overhead lines and cables and substation construction activities.</p> <p>Additional information requested by Thurrock Council was issued in February 2026, and the Applicant held additional meetings with Thurrock Council in February and March 2026 to discuss these topics further.</p>	<p>A number of points were raised meetings to which further information was to be provided by National Grid to further assess whether mitigation was appropriate.</p> <p>Comments from meetings are required for better understanding of outcomes/discussions.</p> <p>The ASDA roundabout junction (site 89) shows very high levels of congestion in FY with queue lengths extending beyond the A1089 Marshfoot junction upstream. Although the assessment identifies background growth as the main cause, the scale of impact requires further investigation. The Scheme modelling adds additional 100 PCUs (600m) to the queue whilst</p>	Under discussion

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			<p>background traffic is responsible for 300 PCUs of queue lengths. Area-wide demand reassignment, peak spreading and other demand redistribution should be considered (e.g. using an area-wide model) to confirm the actual scale of impact. Moreover, mitigation measures should be tested and put forward to improve junction operation. At present no mitigation is proposed and the scale of impact is significant. A review of this junction's modelling using primary survey data would be recommended.</p> <p>M25 J30 is shown to experience delay in the FY scenario. Accepting that the Scheme impact is reported to be low, the high congestion levels at such a key junction necessitates further assessment. The TA advises that mitigation in the form of signal optimisation is proposed, but no information is provided on what the results for the signal-optimised junction will be. A review of the modelling using primary traffic data would be advisable given the strategic nature of this junction and the likelihood of the FY congestion.</p>	
3.10.20	Assessment of WCH	<p>The assessment of WCH impacts as a result of the Project is presented in Section 7.4 (Walkers, Cyclists and Horse riders network) of the <b>7.11 Transport Assessment TA [APP-333]</b>. This is based on the assessment undertaken within Section 16.7 (Residual Effects) of <b>6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]</b> and <b>6.16.A4 Environmental Statement</b></p>	<p>A number of points were raised meetings to which further information was to be provided by National Grid to further assess whether mitigation was appropriate.</p> <p>Comments from meetings are required for better understanding of outcomes/discussions.</p>	Under discussion

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		<p><b>Appendix 16.4 - Traffic and Transport Construction Effects Appendix 16.4: Traffic and Transport Construction Effects of Chapter 16 - Traffic and Transport (document reference 6.16.A4) [APP-275].</b> The assessment methodology used is considered appropriate.</p> <p>Thurrock Council comments are noted, and meeting notes have been provided to Thurrock Council for their review. National Grid will continue to engage with Thurrock Council on this matter.</p>	<p>WCH route severance was identified at three locations (PARs 64, 65 and 66) with loss of WCH amenity at further two locations (PARs 67 and 68). There is no suggestion of alternative WCH routing being put forward. Mitigation is proposed in the form of driver information packs. Requires additional measures such as on-site signage or diversion route information for WCH route users</p>	
3.10.21	Impact on Parking	<p>TROs required for the Project in Thurrock can be found within Schedule 13 Parts 1 to 4 of <b>3.1 Draft Development Consent Order [REP4-037]</b>, and includes a "No waiting restriction (7am to 7pm Monday to Sunday)" along the A128 Brentwood Road to allow for closing off of the layby adjacent to proposed Site Access Point TB-B137, as shown in <b>2.4 Traffic Regulation Order Plans - Section H [REP4-018]</b>. This proposed TRO restriction was discussed with Thurrock Council in February 2026, and the Applicant signposted Schedule 13 for the council to review. The Applicant offered the council a separate call to review any points they would like clarification on.</p> <p>There are no other intended on-street parking suspensions within Thurrock.</p>	<p>Noted.</p> <p>No evidence of a schedule of suspensions agreed by LHA has been provided.</p>	Under discussion
3.10.22	Road Safety	<p><b>7.11 Transport Assessment - Appendix A - Norwich to Tilbury RSA Strategy [APP-334]</b> summarises the road safety audit process undertaken during the development of the DCO application for the Project, which followed the</p>		Under discussion

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		<p>requirements for road safety audit as set out in DMRB document GG 119.</p> <p>The level of detail produced for the Stage 1 RSA briefs and plans was considered as sufficient for the Audit Team to undertake their site assessments of the proposals. The Road Safety Audit Team has examined and reported only on the road safety implications of the Project as presented and has not examined or verified the compliance of the designs to any other criteria.</p> <p>Additional information requested by Thurrock Council was issued in February 2026, and the Applicant held a meeting with Thurrock Council in March 2026 to discuss Stage 1 Road Safety Audit Designer Responses. The Applicant acknowledges the points raised by Thurrock Council in this meeting and are preparing additional information to share with Thurrock Council in due course.</p> <p>Further details are to be developed in detailed design stage and will be subject to LHA acceptance, and where applicable, the associated stages of road safety audit. The Applicant will continue to engage with Thurrock Council on this matter.</p>		
<b>Transport Assessment – Mitigation Measures</b>				
3.10.23	Mitigation Measures	<p>Mitigation measures include embedded, standard and 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.</p> <p>In March 2025, National Grid held a meeting to present examples of the likely environmental</p>	<p>Noted but without fully understanding impact it is difficult to consider if mitigation is required.</p> <p>Further details in CTMP, may need referencing here.</p> <p>The TA proposes proportionate mitigation, traffic monitoring and interventions such as</p>	Under discussion

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		<p>mitigation measures following ES assessment of effects for junctions and Primary Access Routes. The meeting notes have been provided to Thurrock Council.</p> <p><b>7.3 Outline Construction Traffic Management Plan (Revision C) [REP4-174]</b> includes details of the proposed mitigation measures. <b>7.11 Transport Assessment [APP-333]</b> provides additional information on the process to identifying these mitigation measures. These mitigations measures are considered appropriate. Thurrock Council is reviewing additional information that has been provided by the Applicant.</p> <p>Traffic and transport mitigation proposed within <b>7.11 Transport Assessment [APP-333]</b> and the <b>6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]</b> is captured within <b>7.3 Outline Construction Traffic Management Plan (Revision C) [REP4-174]</b>.</p> <p>The Applicant intends that a final Construction Traffic Management Plan be agreed prior to each stage of the authorised development. <b>7.3 Outline Construction Traffic Management Plan (Revision C) [REP4-174]</b> and <b>7.6 Outline Public Rights of Way Management Plan [REP4-178]</b> are secured through Requirement 4(1) of Schedule 3 of <b>3.1 Draft DCO [REP4-164]</b>.</p>	<p>movements of construction vehicle trips outside of the peak hour periods. It should be specified which junctions are considered for this approach.</p> <p>Mitigation at junctions which are shown to be affected by the scheme (in particular the ASDA roundabout) is required and details of proposed mitigation at M25 J30 is needed. Further mitigation in the CTMP mentions monitoring of implementation of TP measures through TPC inputs, monitoring HGV movements to ensure they are in line with scheme proposals.</p> <p>Where construction works are programmed to take place at the same time as other developments nearby, discussions are proposed between Main Works Contractors, LHA and NH to manage impact and mitigate. Details of specific locations/schemes in question and details of arrangements are required.</p>	
<b>Transport Assessment – Baseline Conditions</b>				
3.10.24	Policy and Legislation	All relevant transport strategy, policy and guidance were reviewed and agreed by Thurrock Council	Noted. See comment to 3.10.1	Agreed

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		<p>following their review of the Draft Transport Assessment in February 2025.</p> <p>The Thurrock Local Transport Plan Vision 2050 was reviewed but was not explicitly referenced within the <b>7.11 Transport Assessment [APP-333]</b> as the vision establishes a broader long-term plan for transport in Thurrock and it is not relatable to the Project due to the temporary nature of the impact.</p> <p>The Emerging Thurrock Transport Strategy 2026-2040 was published in November 2025 and was still under consultation until February 2026, after the application for development consent. The Applicant will continue to engage with Thurrock Council to understand any impact to the assessment of the Primary Access Routes related to the goals and major schemes provided within the Emerging Thurrock Transport Strategy 2026-2040.</p>	<p>Thurrock Council agreed this matter during a meeting in May 2026.</p>	
3.10.25	Baseline conditions	<p>The baseline conditions and sensitive receptors for Traffic and Transport are presented in Section 4 (Existing Baseline Transport Conditions) of <b>7.11 Transport Assessment [APP-333]</b> and are considered appropriate. For greater detail on PARs, the <b>7.11 Transport Assessment [APP-333]</b> refers to the baseline assessment undertaken within <b>6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]</b>. Please refer to <b>6.16.A2 Environmental Statement Appendix 16.2 – Traffic and Transport Baseline Conditions [APP-273]</b>.</p> <p>Additional information requested by Thurrock Council was issued in February 2026, and the Applicant held additional meetings with Thurrock</p>	<p>A number of points were raised in meetings to which further information was to be provided by National Grid to further assess whether baseline conditions were appropriate.</p> <p>May need expanding to demonstrating better understanding of frontage and critical features.</p>	Under discussion

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		Council in February and March 2026 to discuss these topics further.		
<b>Transport Assessment – Future Baseline Conditions</b>				
3.10.26	Growth Factors	<p>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 Chapter 5 (Future Baseline) of <b>7.11 Transport Assessment [APP-333]</b>. 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.</p> <p>The Applicant will continue to engage with Thurrock Council on this matter.</p>	<p>Noted.</p> <p>Needs further review and confirmation of methodology being fully robust.</p> <p>TEMPro growth factors have been included into the traffic monitoring and impact assessment. This is considered robust and standard practice.</p>	Under discussion
3.10.27	Cumulative Developments	<p>Further engagement with the Lower Thames Crossing (LTC) Project Team following the submission of the application for development consent identified that traffic flows and assumptions used within the <b>7.11 Transport Assessment [APP-333]</b> and <b>6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]</b> did not fully represent the increase in traffic associated with the LTC development during our peak construction activities. This was due to the existing LTC programme (January 2025 to December 2030) considered in the <b>7.11 Transport Assessment [APP-333]</b> being superseded for the purposes of the Project assessment because of the late approval of the LTC Development Consent Order application (March 2025). Further assessment has been undertaken using traffic numbers provided by LTC Transport Team from their own strategic model</p>	<p>Noted but it was raised about the impact of LTC and further information is awaited.</p> <p>More evidence of LTC impacts being considered as it is a key/most significant committed development.</p> <p>A total of 29 committed developments were initially considered as part of the assessment. 17 of those were subsequently excluded due to not being adjacent to a PAR, not considered to coincide with NG construction programme and lack of traffic information. Four of the excluded schemes are located adjoining the PARs and scheme area. Their scale and proximity necessitates a close assessment of potential impact, in particular the schemes in Corringham, Lower Dunton Road golf club, Sandown Road residential scheme and a residential scheme</p>	Under discussion

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		<p>within the study area. Coordination and collaboration with the LTC Transport Team is ongoing regarding the combined impact of the Projects and mitigation at the Orsett Cock Roundabout. The Applicant will engage with Thurrock to present these findings.</p> <p>An addendum to <b>7.11 Transport Assessment [APP-333]</b> will be submitted during examination at Deadline 4 to present the findings of additional modelling undertaken within Thurrock. The Applicant will present the findings of this assessment to Thurrock Council.</p>	<p>at Chadwell St Mary. A closer assessment of programme of works is required to confirm that those will not coincide and indicative traffic demand numbers should be used for a robust assessment even if no demand distribution data is available for the scheme.</p>	
<b>Transport Assessment – Trip Generation</b>				
3.10.28	Key Assumptions	<p>Discussions with Thurrock Council on key assumptions are ongoing and meeting notes have been provided to Thurrock Council; Thurrock Council is reviewing additional information that has been provided by the Applicant.</p>	<p>A number of points were raised in meetings to which further information was to be provided by National Grid.</p> <p>Comments from meetings are required for better understanding of outcomes/discussions.</p>	Under discussion
3.10.29	Methodology	<p>The methodology for assessing the technical information received from the technical teams and generating the trip estimate is found within Section 6 (Methodology) of <b>7.11 Transport Assessment [APP-333]</b>, and is considered suitable and robust. Thurrock Council comments are noted, and meeting notes have been provided to Thurrock Council for their review.</p>	<p>A number of points were raised in meetings to which further information was to be provided by National Grid.</p> <p>Comments from meetings are required for better understanding of outcomes/discussions.</p>	Under discussion

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3.10.30	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 Section 6.2 (Construction Vehicles Overview) of <b>7.11 Transport Assessment [APP-333]</b>. The trip generation is considered appropriate.</p> <p>Thurrock Council comments are noted, and meeting notes have been provided to Thurrock Council for their review.</p>	<p>A number of points were raised in meetings to which further information was to be provided by National Grid.</p> <p>Comments from meetings are required for better understanding of outcomes/discussions. Profiles may be sufficient at this stage but emphasis needed to guarantee contractor assessment pre-works.</p>	Under discussion
3.10.31	Construction Workforce Trips	<p>Overhead Line, cabling and substation workforce trips have been estimated based on shared occupancy as presented in Section 6.4 (Construction Staff Overview) of <b>7.11 Transport Assessment [APP-333]</b>.</p> <p><b>7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]</b> was included in the application for development consent; this will be developed into a final detailed plan by the Main Works Contractor(s). The workforce trip generation is considered appropriate.</p> <p>Thurrock Council comments are noted, and meeting notes have been provided to Thurrock Council for their review.</p>	<p>A number of points were raised in meetings to which further information was to be provided by National Grid.</p> <p>Comments from meetings are required for better understanding of outcomes/discussions. Some information contained within CWTP with mitigation</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<b>Transport Assessment – Conclusions</b>				
3.10.32	Overall impact of the Project	<p>The conclusions of the Transport Assessment are presented within Section 8 (Conclusion) of <b>7.11 Transport Assessment [APP-333]</b>. The conclusions are considered appropriate.</p> <p>Thurrock Council comments are noted, and meeting notes have been provided to Thurrock Council for their review.</p>	<p>A number of points were raised in meetings to which further information was to be provided by National Grid.</p> <p>Requires updating if changes made to TA.</p>	Under discussion
<b>Outline Construction Traffic Management Plan (CTMP)</b>				
3.10.33	Project Team Roles and Responsibilities	<p>The Project Roles and Responsibilities are detailed in Section 3 of <b>7.3 Outline Construction Traffic Management Plan (Revision C) [REP4-174]</b>. The roles and responsibilities are detailed in Table 3.1. The Main Works Contractor is responsible for developing and adopting the Construction Traffic Management Plan, with the Applicant held responsible for any breach of compliance. The Roles and their responsibilities are not expected to change during construction. There may be named individuals that change, but the Role and its Responsibilities will remain the same. As a result, this will not require the Construction Traffic Management Plan to go through the change process at each instance of individual turnover.</p>	<p>Noted.</p> <p>Where and when project team members change this section should be updated within the CTMP in accordance with the stages identified in Section 1.7 - Process of the CTMP.</p>	Under discussion
3.10.34	Pre-and Post Construction Surveys	<p>Pre- and Post Construction surveys are detailed in Section 5.2 of the <b>7.3 Outline Construction Traffic Management Plan (Revision C) [REP4-174]</b>. The scope of these surveys is to be agreed with each Local Highway Authority. The results of these pre-</p>	<p>Noted.</p> <p>Justification of approach and scope of all and any pre and post construction surveys will need to be agreed with Thurrock Council (TC), and as appropriate updates included within an updated CTMP. Once completed,</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>condition surveys will be shared with the LHAs prior to work commencing.</p> <p>Section 5.2.3 includes information on the good practice measure GG06 in the <b>7.2 Outline Code of Construction Practice [ REP4-164]</b>, a record of condition will be carried out. The record will be available for comparison following reinstatement after the works have been completed to enable the standard of reinstatement to meet the conditions the pre-condition survey.</p>	<p>all results of pre and post construction surveys will need to be shared with TC for review and comparative assessment. This extends to all works completed on or impacting the public highway including all PRowWs.</p>	
3.10.35	Traffic Management Measures	<p>Schedule 13 of <b>3.1 Draft DCO [REP4-037]</b> and the <b>2.4 Traffic Regulation Order Plans - Section H [REP4-018]</b> sets out all TRO requirements within Thurrock for the Project.</p> <p>The specific traffic management requirements are to be developed by the Main Works Contractor, and will be subject to approvals from the Local Highway Authority, for the temporary and permanent highway works associated with the Project as set out in the <b>2.5 Access, Public Rights of Way and Public Rights of Navigation Plans - Section H [REP4-020]</b> and in the <b>7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section H [REP4-173]</b>.</p>	<p>A number of points were raised in meetings to which further information was to be provided by National Grid. All and any outstanding information requested by TC should be provided.</p> <p>All Traffic Management (TM) measures will need to be agreed by TC and the detail included within an updated CTMP. No movement of construction vehicles or works are to be undertaken until full and agreements/ permissions are in place.</p> <p>To enable review, detailed TM plans and will need to be submitted to TC to provide sufficient detail to that submitted at this preliminary stage. Where appropriate, further discussions may be required.</p> <p>This may include, but not be exclusive to road closures, diversions, highways works, traffic management, temporary speed restrictions, temporary PRow closures, stopping up orders, Traffic Regulation Orders (TRO), Temporary Traffic Regulation Orders</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.10.36	Implementation / Enforcement	<p>The implementation and enforcement process set out in Section 6 of <b>7.3 Outline Construction Traffic Management Plan (Revision C) [REP4-174]</b> is considered to be appropriate and adequate for the Project.</p> <p><b>7.3 Outline Construction Traffic Management Plan (Revision C) [REP4-174]</b> is secured through Requirement 4 within Schedule 3 of <b>3.1 Draft DCO (Revision C) [REP4-037]</b>. Requirement 4 requires that the Construction Traffic Management Plan be submitted to and approved by the relevant planning Authority, following consultation with the relevant highway authority.</p>	<p>(TTRO) and information on planned AIL movements.</p> <p>Noted. Enforcement processes will need to be agreed within a condition.</p>	Under discussion
<b>Outline Construction Workers Travel Plan (CWTP)</b>				
3.10.37	Policy	<p>All relevant transport strategy, policy and guidance were reviewed and agreed by Thurrock Council following their review of the Draft Transport Assessment in February 2025.</p> <p>The Thurrock Local Transport Plan Vision 2050 was reviewed but was not explicitly referenced within the <b>7.11 Transport Assessment [APP-333]</b> as the vision establishes a broader long-term plan for transport in Thurrock and it is not relatable to the Project due to the temporary nature of the impact.</p> <p>The Emerging Thurrock Transport Strategy 2026-2040 was published in November 2025 and still was under consultation until February 2026, after the application for development consent. The Applicant will continue to engage with Thurrock Council to</p>	<p>Noted. See comment to 3.10.1 Thurrock Council agreed this matter during a meeting in May 2026.</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>understand any impact to the assessment of the Primary Access Routes related to the goals and major schemes provided within the Emerging Thurrock Transport Strategy 2026-2040.</p>		
3.10.38	Site Accessibility Review	<p>The Outline Construction Worker Travel Plan was presented to Thurrock Council in August 2024 and October 2024 (Policy Inclusion). This was run through in terms of structure and the assessment of sustainable access process. The draft Construction Worker Travel Plan was shared with Thurrock Council in May 2025, prior to the application for development consent. Table 4.1 includes detail on the accessibility of the proposed site accesses, based on the methodology detailed in Section 4.2.2. No comments were received at the time from Thurrock Council on the draft Outline Construction Worker Travel Plan. Additional documentation requested by Thurrock Council was issued in February 2026 and is with Thurrock Council for review.</p>	<p>A number of points were raised in meetings to which further information was to be provided by National Grid.</p>	Under discussion
3.10.39	Targets, Strategy, and Measures	<p>The Outline Construction Worker Travel Plan was presented to Thurrock Council in August 2024 and October 2024 (Policy Inclusion). This was run through in terms of structure. The draft Construction Worker Travel Plan was shared with Thurrock Council in May 2025, prior to the application for development consent. The proposed targets were detailed within the draft Outline Construction Worker Travel Plan. Additional documentation requested by Thurrock Council was issued in February 2026 and is with Thurrock Council for review.</p>	<p>A number of points were raised in meetings to which further information was to be provided by National Grid. Carry out further review of document and comment where these may be considered insufficient.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.10.40	Monitoring and Review	<p><b>7.3 Outline Construction Traffic Management Plan Appendix B - Outline Construction Worker Travel Plan [APP-311]</b>, as part of <b>7.3 Outline Construction Traffic Management Plan (Revision C) [REP4-174]</b>, is secured through Requirement 4 within Schedule 3 of <b>3.1 Draft DCO (Revision C) [REP4-037]</b>. Requirement 4 requires that the Construction Traffic Management Plan be submitted to and approved by the relevant planning Authority, following consultation with the relevant highway authority.</p>	<p>Noted. Will need to be agreed within a condition.</p>	Under discussion
<b>Construction Access Strategy and Design</b>				
3.10.41	Construction Access Approach	<p>The Primary Access Routes were initially discussed with the Local Highway Authorities in August 2023. Specific discussions were held in March and June 2024 on the Primary Access Routes and proposed highway mitigations. In August 2024, discussions were held on any key items raised within Section 42 consultation. Highway mitigation workshops were held with the Local Authorities to discuss the proposals. In June 2025, additional review of the Statements of Common Ground and indicative considered status for the construction accesses.</p> <p>Specific AIL workshops were held in addition to the above with Local Highway Authorities to understand any structural limitations and suitability of the routes proposed.</p> <p>Additional documentation requested by Thurrock Council was issued in February 2026 and is with Thurrock Council for review.</p>	<p>A number of points were raised in meetings to which further information was to be provided by National Grid.</p> <p>All and any outstanding information requested by TC should be provided.</p> <p>TC would like to see further validation that the routes selected are acceptable in terms of highways design and capacity assessments.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.10.42	Primary Access Route Selection	<p>Routes on local roads proposed to be utilised as Primary Access Routes (PARs) are shown in <b>7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans [APP-312 to APP-320 inclusive]</b>. These have been discussed with Thurrock Council during regular engagement meetings since September 2023. These PARs are considered to be suitable for use by the proposed construction traffic, considering the proposed mitigation measures detailed within the <b>7.3 Outline Construction Traffic Management Plan (Revision C) [REP4-174]</b>.</p> <p>Thurrock Council comments are noted, and meeting notes have been provided to Thurrock Council for their review.</p>	<p>The PARs are noted as presented within the CTMP.</p> <p>A number of points were raised in meetings to which further information was to be provided by National Grid. All and any outstanding information requested by TC should be provided.</p> <p>TC would like to see further validation that the routes selected are acceptable in terms of highways design and capacity assessments.</p> <p>National Grid advised that the PARs have been previously agreed by TC. National Grid are requested to evidence any formal agreement made by TC Highways.</p>	Under discussion
3.10.43	Construction Access and Crossover Design	<p>The Applicant is concurrently supporting the Local Highway Authority with changes to their team by providing additional details of past engagement, design development and other considerations. Through this process the Applicant welcomes future engagement with Thurrock Council and is proactively seeking to satisfy Thurrock Council's requests to receive acceptance of the Stage 1 Road Safety Audits.</p> <p><b>7.11 Transport Assessment - Appendix A - Norwich to Tilbury RSA Strategy [APP-334]</b> summarises the road safety audit process undertaken during the development of the DCO application for the Project, which followed the requirements for road safety audit as set out in DMRB document GG 119.</p>	<p>A number of points were raised in meetings to which further information was to be provided by National Grid.</p> <p>The December 2025 copy of the RSA1 Designers Response report indicates that these safety issues have not been addressed.</p> <p>Agreed RSA cites that further design development is required and this with further information will be provided at the Detailed Design Stage. As such, TC are unable to sign off the RSA1 designs.</p> <p>Further work to preliminary designs audited is required to assure TC that the sites have been properly considered (e.g. designs on</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>The level of detail produced for the Stage 1 RSA briefs and plans was considered as sufficient for the Audit Team to undertake their site assessments of the proposals. The Road Safety Audit Team has examined and reported only on the road safety implications of the scheme as presented and has not examined or verified the compliance of the designs to any other criteria.</p> <p>The Applicant is working with Thurrock to address their concerns, and these have been resolved at all but six remaining sites.</p> <p>Further details are to be developed in detailed design stage and will be subject to LHA acceptance, and where applicable, the associated stages of road safety audit.</p>	<p>OS mapping with no regard to frontage constraints / critical features.</p> <p>It is therefore expected that the Design Organisation/ Design and Build Contractor will undertake further design development on topographical survey information at the Detailed Design stage. Additionally, where further information may be required, this will be provided as appropriate to inform the detailed designs. These designs will be submitted to TC for review and subject to a combined Stage 1 / 2 RSA.</p> <p>TC have undertaken a further review of the submitted designs, and accounting for withdrawn or duplicate submissions have advised that a total of 14 of the audited designs can proceed to Detailed Design Stage, noting that all safety or design issues identified at RSA1 must be addressed and will be reviewed at the Detailed Design Stage and subsequent Stage 2 RSA.</p> <p>TC have advised that a total of six of the audited designs provided insufficient information to be signed off at RSA1, and further information and/ or design development is required, at these locations. These designs are to be resubmitted to TC and re-audited at RSA1 to ensure all RSA1 safety and/ or design comments are addressed.</p> <p>Further, an additional four junction designs (Reference: Proposed Changes to the DCO Application - Change Request 1 (Bulphan) -</p>	

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.10.44	Highway Mitigation Design	<p><b>7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section H [REP4-173]</b> sets out the locations of proposed highway mitigation.</p> <p>The applicant confirms that there are no 'red' mitigation measures proposed within Thurrock Council.</p> <p>All 'yellow' and 'orange' mitigation measures will require development of design details, which will be subject to LHA acceptance, and where applicable will be subject to associated road safety audit stages.</p> <p>The Applicant is concurrently liaising with the representatives acting on behalf of the Council and is providing additional details of past engagement, design development and other considerations. Through this process the Applicant welcomes future engagement with Thurrock Council and is proactively seeking to satisfy Thurrock Council's</p>	<p>4 no. Junctions) are to be submitted and audited at RSA1, and submitted to TC for review at RSA1.</p> <p>For the purposes of clarity, a total of 10 site access, bellmouth or crossover designs are still to be approved at the preliminary design and Stage 1 RSA stage.</p> <p>TC have issued the above detailed list to the applicant and await the updates to the preliminary designs and Detailed Design drawings.</p> <p>Noted but without fully understanding impact it is difficult to consider if mitigation is required.</p> <p>TC note the Applicant's acknowledgment of the absence of 'red' mitigation measures based on TC previous feedback.</p> <p>Two orange mitigation measures are shown on plan as:</p> <ul style="list-style-type: none"> <li>• TN1 Brentwood Road (Dwg No: 107850-MMD-08-XX-DWG-D-1931 - temporary removal of traffic island</li> <li>• TN9 Stanford Road (Dwg No: 107850-MMD-08-XX-DWG-D-1930 - temporary removal of traffic island</li> </ul> <p>Only one of the above is shown on the App C Highway Mitigations Plan Section H, and both have differing references on the Section H plan.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		requests to receive acceptance of the Stage 1 Road Safety Audits.	<p>The Applicant should correct/ make consistent the referencing of the mitigation measures on the supporting documentation.</p> <p>All and any highway mitigation measures requiring modifications to, or works in the public highway, i.e. 'orange' and 'yellow' which may include road widening, creation of passing lanes, removal of street furniture/ modification to the public highway will require detailed design approval. As per comments to ID No: 3.10.40, the Applicant has been advised which of these mitigation measures may require further information either at preliminary (and Stage 1 RSA) or Detailed (and at Stage 2 RSA) design stages.</p> <p>It is expected that the Design Organisation/ Design and Build Contractor will undertake further design development on topographical survey information at the appropriate stage.</p> <p>To inform further review assessment of the appropriateness of the designed locations, TC have requested the provision of the following information for all site access points, crossovers and bellmouths:</p> <ul style="list-style-type: none"> <li>• Peak period construction vehicles by daily flows</li> <li>• Peak period construction vehicles by vehicle type breakdown</li> <li>• Duration of peak period construction vehicle traffic flow</li> <li>• Speed data</li> </ul>	

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
			TC have received this data for 10 site access points only. TC request the Applicant provide the outstanding information to assist with the further reviews of the site access, bellmouth and crossover designs.	
3.10.45	Traffic Management	The Applicant notes this request and shall continue to engage with Thurrock Council on these matters. The Applicant is proposing to utilise the Permit Schemes in place and operated by Thurrock, in order to best coordinate the street works. The specific locations, timings and specific traffic management will need to be agreed with the relevant highway authorities, as noted in paragraph 5.8.2 of <b>7.3 Outline Construction Traffic Management Plan (Revision C) [REP4-174]</b> .	Noted but without fully understanding impact it is difficult to consider if the proposed Traffic Management Measures are appropriate. All junction designs and operations thereof will inform the required Traffic Management. As identified in TC responses to ID No 3.10.40 and 3.10.41 further information and design development is required for review. Further work to preliminary designs audited is required to assure TC that the sites have been properly considered. . Additionally, Detailed Design drawings require design development which will also inform the required Traffic Management The Design Organisation / Design and Build Contractor will undertake further design development at the Detailed Design stage. Additionally, where further information may be required, this will be provided as appropriate to inform the detailed designs. These designs will be submitted to TC for review and subject to a combined Stage 1 / 2 RSA.	Under discussion
3.10.46	Traffic Regulation Orders and	The Applicant has regularly engaged with Thurrock Council throughout the development of the application for development consent. More recently	Noted. As per response to ID No: 3.10.32, all Traffic TM measures including TROs and TTROs	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
	Temporary Traffic Regulation Orders	<p>(in February 2026) the Applicant has held detailed discussions with the new representatives acting on behalf of the Council to provide historic context and agreements and develop their understanding relating to key aspects of the Project proposals and DCO. These meeting have covered Primary Access Route route selection, Stage 1 Road Safety Audit, access strategy and design for site access points and crossing points, highway mitigation design, and Traffic Regulation Order strategy. The Applicant has signposted the Council and their representatives to DCO materials, and the Applicant remains committed to additional further dialogue with the Council and their representatives to agree the matters under discussion within the detailed design/ahead of works being commenced.</p>	<p>will need to be agreed by TC and the detail included within an updated CTMP. No movement of construction vehicles or works are to be undertaken until full and proper agreements/ permissions are in place. This may include discussion and development through to agreement via the Detailed Design and RSA process (Stage 1 / 2 as per responses to ID No: 3.10.40 and 3.10.41).</p>	
3.10.47	Primary Access Route on Muckingford Road	<p><b>7.3 Outline Construction Traffic Management Plan Appendix C Indicative Highway Mitigation Plans - Section H [REP4-173]</b> presents the Primary Access Routes and AIL access routes together with indicative images of the construction vehicles anticipated to travel along these routes.</p> <p>The Applicant confirms LGV vehicle routes have not been included within these Application plans.</p> <p>The Applicant is aware of a discrepancy in <b>7.3 Outline Construction Traffic Management Plan (Revision C) [REP4-174]</b> for Table 5.1. This is noted and will be updated in due course. H40-A1 is not Muckingford Road, however the only vehicles expected on Muckingford Road are LGVs. This is based on previous discussions with Thurrock on the acceptability/suitability for HGV routes.</p>	<p>A number of points were raised in meetings to which further information was to be provided by National Grid.</p> <p>In principle the use of these roads by LGVs may be appropriate. Subject to confirmation of forecast traffic flows and review and agreement of appropriate capacity assessment use of this route may be considered acceptable.</p> <p>TC note the Applicant's acknowledgement of the discrepancy in Table 5.1 and the commitment to amend the Outline CTMP as appropriate.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.10.48	Highway Mitigation Design on Hoford Road	<p>Thurrock Council has previously outlined plans for restoration of the farmland at Walton Hall Farm, which include the addition of a footpath along Buckingham Hill Road. This proposed route would connect Public Footpaths FP41 and FP43, significantly improving access for pedestrians and other non-motorised users. To ensure safety and usability, both the footway and Non-Motorised User (NMU) infrastructure on Hoford Road must be designed by the appointed design-and-build contractor to support secure crossing movements and be fully compatible with existing rights of way. Details of tie in with Buckingham Hill Road and coordination with emerging Thurrock Council proposals, including along Buckingham Hill Road, are to be considered within the detailed design development of the Hoford Road highway mitigation proposals. These design proposals shall include appropriate visibility for all users and be subject to the associated stages of RSA.</p> <p>The design and layout of the proposed mitigation proposal along Hoford Road and all diverted Public Rights of Way were developed based on site specific data and information. The design that has been developed in the indicative layouts considered both Design Manual for Roads and Bridges design standards, and the anticipated design vehicles using this route. The design development of Hoford Road utilised high density LiDAR data to verify vertical constraints and their visibility splay requirements, and where identified, the Order Limits have been refined to accommodate potential works to mitigate</p>	<p>A number of points were raised in meetings to which further information was to be provided by National Grid.</p> <p>All and any outstanding information requested by TC should be provided.</p> <p>The December 2025 RSA1 – Proposed Bellmouth access TN-B014 Buckingham Hill Road / Horford Road states ‘No road safety related issues were identified for the preliminary design of this access bellmouth at the Stage 1 Road Safety Audit.</p> <p>However, 2.20.1: Problem 16 for the Hoford Road Junction with Buckingham Hill Road identifies design issues associated with pedestrian and cyclist’s visibility</p> <p>TC have undertaken a further review of the submitted designs, and accounting for withdrawn or duplicate submissions have advised that a total of 14 of the audited designs can proceed to Detailed Design Stage, noting that all safety or design issues identified at RSA1 must be addressed and will be reviewed at the Detailed Design Stage and subsequent Stage 2 RSA.</p> <p>TC have advised that a total of six (including Hoford Road) of the audited designs provided insufficient information to be signed off at RSA1, and further information and/ or design development is required, at these locations. These designs are to be resubmitted to TC and re-audited at RSA1 to</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		3D constraints. This includes allowance for earthworks and drainage.	<p>ensure all RSA1 safety and/ or design comments are addressed.</p> <p>TC have advised National Grid that three versions of the Hoford Road highway mitigation plan have been issued. TC have requested a single layout be progressed and submitted with appropriate bellmouth referencing. TC have advised the Applicant of the additional information required to support the preliminary design.</p> <p>This design has not been signed off at RSA1.</p>	
<b>Abnormal Indivisible Load (AIL) Access</b>				
3.10.49	Abnormal Indivisible Load (AIL) Access Approach	<p>Vehicle tracking movements for AILs has been undertaken based on OS mapping along the AIL routes. <b>7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section H [REP4-173]</b> presents the AIL access routes, and also sets out locations where temporary highway mitigation measures have been identified together with descriptions and suggested mitigation measures for each location. Further details are to be developed in detailed design stage and will be subject to LHA acceptance, and where applicable, the associated stages of road safety audit.</p> <p>The Contractor will confirm source materials and equipment which will inform the logistics and routeing of the abnormal load deliveries which are required in order to finalise the routes. As noted in <b>7.3 Outline Construction Traffic Management</b></p>	<p>Indicative AIL trip generation arrival and departure (delivery) movements on the PAR for the large mobile crane, cable drum and transformer are provided within Tables 5.2, 5.3 and 5.4 respectively of the AIL Access Strategy (Appendix A of the CTMP).</p> <p>It is noted these may be subject to change upon finalisation of the construction programme by the Main Works Contractor, provision and consideration of further assessments, agreement with stakeholders and then final route selection.</p> <p>A full assessment would need to be undertaken of the impacts of the AIL movements in terms of capacity and potential mitigation requirements to determine the full impacts on the highway on the final route selection.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p><b>Plan Appendix A - AIL Access Strategy [APP-310]</b> the Contractor will liaise with the relevant stakeholders to assess the routes prior to these movements and obtain the necessary permits. Proposed AIL routes are presented in <b>7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]</b> with corresponding indicative highway mitigation plans shown in <b>7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section H [REP4-173]</b>.</p>	<p>This updated information would need to be included within an updated CTMP for review by TC to ensure that the access approach is suitable for use by AILs.</p> <p>Additional information will need to be provided for review by TC and agreements in place ahead of any works being undertaken.</p>	
3.10.50	Abnormal Indivisible Load (AIL) Access Routes	<p>Routes proposed to be utilised by AILs are shown in the <b>AIL Access Strategy [APP-310] (Appendix A of the Outline CTMP)</b>.</p> <p>These have been developed following consultations with Thurrock Council. As part of these consultations, draft route information was shared in July 2024 and April 2025. The Applicant will continue to engage with Thurrock Council as the proposed AIL access routes are developed further, including with respect to the ongoing structural investigations.</p> <p>In March 2025 the Applicant held a meeting with Essex Police on AIL updates.</p> <p>In April 2025 the Applicant held a Thurrock Council AIL Workshop with police and Thurrock Council present.</p> <p>Thurrock Council comments are noted, and meeting notes have been provided to Thurrock Council for their review. See also the Applicant's response to</p>	<p>AIL route options are detailed within Section 4 of the CTMP. It is noted that discussions with statutory stakeholders are ongoing on the majority of route options, and in some instances further information is required, therefore routes for the various AIL load routes are yet to be fully assessed and finalised. As such it is considered that a full assessment of the impact can't be made within agreements in place and route finalisation.</p> <p>Additional information and assessments will need to be undertaken and provided for review by TC, and appropriate stakeholders to ensure that the access approach is suitable for use by AILs. Agreements should be in place ahead of any works being undertaken.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		Abnormal Indivisible Load (AIL) Access Routes above.	This updated information would need to be included within an updated CTMP for review by TC and appropriate stakeholders.	
3.10.51	Abnormal Indivisible Load (AIL) Structural Investigations	<p>Routes proposed to be utilised by Abnormal Indivisible Loads (AILs) are shown in <b>7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]</b>. The Applicant has been consulting with Thurrock Council 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 Thurrock Council in relation to structures on the draft routes shared have been considered in the development of the proposals shown in <b>Management Plan Appendix A - AIL Access Strategy [APP-310]</b>.</p> <p>Engagement with respect to impacted structures is 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 remove requirements for formal application ahead of any AIL movements undertaken by the Project. The relevant process is set out within Section 6 of <b>Management Plan Appendix A - AIL Access Strategy [APP-310]</b>.</p> <p>This approach is considered to establish in principle that the proposed AIL deliveries required for the Project are feasible, and that a suitable process is being undertaken in order to facilitate the anticipated</p>	<p>AIL route options are detailed within Section 4 of the CTMP. It is noted that discussions with statutory stakeholders are ongoing on the majority of route options, and in some instances further information is required. Therefore routes for the various AIL load routes are yet to be fully assessed and finalised. As such it is considered that a full assessment of the impact can't be made within agreements in place and route finalisation.</p> <p>Additional information will and assessments need to be undertaken and provided for review by TC and appropriate stakeholders to ensure that the appropriate assessment of structural impacts have been undertaken and the route(s) are suitable for use by AILs.</p> <p>This updated information would need to be included within an updated CTMP for review by TC and appropriate stakeholders.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>formal AIL movement applications anticipated during construction of the Project.</p> <p>The AIL applications 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 arrangements to accommodate the movements with minimal impact on the network. See also the Applicant's response to Abnormal Indivisible Load (AIL) Access Routes above.</p>		
3.10.52	Abnormal Indivisible Load (AIL) Mitigation and Management Measures	<p>The locations of proposed mitigation measures associated with proposed AIL Routes are shown in the <b>Construction Access Plans</b> within <b>Appendix C</b> of the <b>Outline CTMP [APP-312 to APP-320 inclusive]</b>. These mitigation measures have been developed consistently with the wider Highway Mitigation approach for the Project (<b>ID 3.10.41</b>), and are considered to be suitable and sufficient for the delivery of the Project.</p> <p>Management measures relevant to AIL movements are discussed within <b>Section 5.9</b> of the <b>Outline CTMP [APP-310]</b>, and <b>Section 6</b> of the <b>AIL Access Strategy [APP-310] (Appendix A</b> of the <b>CTMP)</b>. This approach, in principle, is considered to be suitable for AIL access for the Project at the current stage of project development.</p> <p>See also the Applicant's response to Abnormal Indivisible Load (AIL) Access Routes above.</p>	<p>As per response to ID 3.10.43, TC have undertaken a further review of the submitted designs including all mitigation measures within those designs. TC have advised the applicant which designs are to be progressed to Detailed Design/ Stage 2 RSA and those which are to be developed further at the preliminary design stage / Stage 1 RSA. These include the proposed highways amendments and mitigation measures and associated designs. TC acknowledge the requirement for mitigation at these locations but as yet do not consider them to be 'suitable and sufficient' for the delivery of the project without the further development as advised.</p> <p>Further, AIL route options are detailed within Section 4 of the CTMP. It is noted that discussions with statutory stakeholders are ongoing on the majority of route options, and in some instances further information is required. Therefore, routes for the various</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
			<p>AIL load routes are yet to be fully assessed and finalised. As such it is considered that a full assessment of the impact can't be made within agreements in place and route finalisation. Once finalised and fully assessed and agreed, the additional information will need to be provided for review by TC and appropriate statutory undertakers for review to ensure that the access approach is suitable for use by AILs. These agreements must be in place ahead of any works being undertaken.</p> <p>This updated information would need to be included within an updated CTMP for review by TC and appropriate stakeholders.</p>	

### 3.11 Public Rights of Way (PRoW)

Table 3.11 Matters Agreed, Not Agreed or Under Discussion in relation to Public Rights of Way

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<b>PRoW Assessment Chapter</b>				
3.11.1	PRoW Separate Chapter	<p>As per <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate, the Applicant has not included a separate PRoW chapter in the Environmental Statement (ES).</p> <p>Preparing a separate PRoW chapter is not standard practice (there are no previous examples) and would contain a lot of repetition. Multiple effects on single PRoWs have been assessed within <b>6.17</b></p>	Thurrock Council agrees that a separate PRoW chapter is not needed in the ES.	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p><b>Environmental Statement Chapter 17 - Cumulative Effects [APP-281].</b></p> <p>Note that <b>7.6 Outline Public Rights of Way Management Plan [REP4-178]</b> (item <b>ID 3.11.3</b>) has been prepared to set out the proposed approach to the management of PRow during construction of the Project.</p>		
3.11.2	Types of PRow	<p>Types of PRow intended to be considered as part of the Management Strategy were shared with Thurrock Council within Section 2.1 of the PRow Methodology Statement document in April 2025. This list is considered to suitable, and no additional PRow types are required to be captured. The PRow types intended to be considered are:</p> <ul style="list-style-type: none"> <li>• Formally designated PRow (footways, bridleways, restricted byways, and byways open to all traffic)</li> <li>• Permissive paths</li> <li>• Open access land</li> <li>• Cycle tracks, including the National Cycle Network</li> <li>• Other routes with public access.</li> </ul> <p>This is set out in Section 2.4 of <b>7.6 Outline Public Rights of Way Management Plan [REP4-178]</b>.</p> <p>Table 8.3 Site-specific PRow management proposals in <b>7.6 Outline Public Rights of Way Management Plan [REP4-178]</b> refers to Footpath 45, and confirms that it falls under the Temporary Closure (Managed) regime. The full definition for this regime is provided in paragraph 4.1.3 of the plan,</p>	<p>Diversion for Footpath 45(?) near Buckingham Hill Rd was raised in meetings – check if it is included in Outline Management Plans – otherwise agreed</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>with extracts below: <i>'This comprises management of the PRow and Project interactions to allow ongoing use of the PRow by the public. Appropriate signage and access controls to maintain use will be provided by the contractor but short periods of PRow closure may be required under this regime for certain construction activities... 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. In addition there are certain activities...where temporary, short period, localised diversions around the working area will be needed until the PRow can be reopened ...'</i></p> <p>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.</p>		
3.11.3	Proposed Management Regime Approach	<p>The intended approach to management regimes to be considered as part of the Management Strategy were shared with Thurrock Council within Section 2.4 of the PRow Methodology Statement document in April 2025. This established the following hierarchy of management measures:</p> <ul style="list-style-type: none"> <li>• PRows to be kept upon existing alignments as a first preference, utilising management measures if required.</li> <li>• Where maintaining existing PRow alignments is not practicable, diversions along the shortest suitable route will be proposed.</li> </ul>	<p>Thurrock Council is happy with the proposed management regime approach as laid out in the PRow Management Plan.</p> <p>Concerns over specific proposals for Buckingham Hill Road crossing point.</p> <p>The proposals for the Hoford Road crossing point are not realistic where the road is too narrow.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<ul style="list-style-type: none"> <li>Where no suitable diversion routes are identified, PRow closures will be considered as a last resort.</li> </ul> <p>This is set out in Section 4 of <b>7.6 Outline Public Rights of Way Management Plan [REP4-178]</b>.</p> <p>See ID 3.10.48 (Highway Mitigation Design on Hoford Road) for Buckingham Hill Road and Hoford Road. Thurrock Council comments are noted, and National Grid will continue to engage with Thurrock Council on this matter.</p>		
3.11.4	Routes with Public Access Affected by the Proposed Development	<p>Routes with public access affected by the proposed development are shown in the <b>2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-033]</b>. Details of proposed management measures for each impacted route are shown in Section 5 of the <b>7.6 Outline Public Rights of Way Management Plan [REP4-178]</b>. These are considered to be suitable, in line with the Proposed Management Regime Approach (ID 3.11.3) set out above.</p> <p>The Applicant assumes the route diverted near Buckingham Hill Road relates to the Hoford Road Other Route with Public Access. The impact is noted within paragraph 8.6.1 of <b>7.6 Outline Public Rights of Way Management Plan [REP4-178]</b> and as shown on <b>2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-033]</b>, albeit labelled as T-FP-9-D1 instead of T-ORPA-1-D1 (the latter is being identified as an errata). In addition, a drawing of the proposals for Hoford Rd was tabled</p>	Route diverted near Buckingham Hill Road is not shown in the Outline PRow Management Plan. Thurrock Council is not satisfied that it has received sufficient information on the impact on this route.	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		with Thurrock in June 2025 and provided by email after the meeting.		
3.11.5	Reinstatement Approach	<p>All PRow's impacted by construction works will be reinstated to at least the same condition as prior to the works being undertaken. Pre- and Post-Condition Surveys will be undertaken in support of this, and any remediation works will be undertaken in consultation with Thurrock Council PRow Officers as well as impacted landowner(s).</p> <p>This is set out in Section 6 of <b>7.6 Outline Public Rights of Way Management Plan [REP4-178]</b>.</p> <p>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.</p>	Thurrock Council requires clarification on whether everything will be returned to original condition or whether only works that are pre-agreed will be done.	Under discussion

### 3.12 Cumulative Effects

Table 3.12 Matters Agreed, Not Agreed or Under Discussion in Relation to Cumulative Effects

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
<b>EIA – Regulatory, Planning Policy Context and Guidance</b>				
3.12.1	Policy and legislation	<p>The policy context, legislation and guidance considered when undertaking the Cumulative Effects assessment is presented in <b>6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]</b> and Section 17.2 of <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b>.</p>	Thurrock Council agrees that all relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment.	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.		
<b>EIA – Approach and Methods</b>				
3.12.2	Study area	The study area was agreed through the Applicant's <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and the <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.12.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 17.4 and 17.5 of <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b> .	Thurrock Council agrees sufficient desktop and survey data was collected to inform the assessment.	Agreed
3.12.4	Assessment methodology	The methodology for assessing Cumulative Effects was agreed through the Applicant's <b>6.19 Scoping Report [APP-288]</b> to <b>[APP-296]</b> and the <b>6.20 Scoping Opinion [APP-297]</b> received from the Planning Inspectorate.	The methodology for assessing Cumulative Effects was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.12.5	Key parameters and assumptions	Key parameters and assumptions associated with the Cumulative Effects assessment are summarised in Section 17.5 and 17.6 of <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b> . The key parameters and assumptions presented are considered appropriate.	Thurrock Council agrees the key parameters and assumptions are appropriate.	Agreed
<b>EIA – Baseline Conditions</b>				
3.12.6	Baseline conditions and receptors	The baseline conditions and receptors for Cumulative Effects are presented within the environmental topic chapters (Chapters 6 – 16 of the	Thurrock Council agrees the baseline conditions and receptors are appropriate.	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		ES [APP-138 to APP-280]). The baseline conditions and receptors presented are considered appropriate.		
<b>EIA – Embedded, Standard and Additional Mitigation Measures</b>				
3.12.7	Embedded mitigation	<p>The assessment of cumulative effects considered the residual effects identified during construction and operation (and maintenance) within the environmental topic chapters (Chapters 6 – 16 of the ES [APP-138 to APP-280]). Embedded mitigation measures, designed and implemented as an inherent part of the Project are set out in the environmental topic chapters of the ES. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>See comments on embedded mitigation throughout this document.</p>	<p>Thurrock Council acknowledges the embedded mitigation measures are set out in the Environmental Statement and that it is National Grid's responsibility to ensure their implementation. We would also ask that National Grid considers the council's other statements in regard to mitigation that are discussed in the rest of this document.</p>	Under discussion
3.12.8	Standard mitigation	<p>The assessment of cumulative effects considers the residual effects identified during construction and operation (and maintenance) within the environmental topic chapters (Chapters 6 – 16 of the ES [APP-138 to APP-280]). Standard mitigation measures to reduce potential Cumulative Effects during construction are summarised in the environmental topic chapters of the ES and set out in <b>7.2 Outline Code of Construction Practice [REP4-164]</b>. The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.</p> <p>See comments on standard mitigation throughout this document.</p>	<p>Thurrock Council acknowledges the standard mitigation measures are set out in the Environmental Statement and that it is National Grid's responsibility to ensure their implementation. We would also ask that National Grid considers the council's other statements in regard to mitigation that are discussed in the rest of this document.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.12.9	Additional mitigation	The consideration of additional mitigation measures is presented in Sections 17.4 and 17.5 of <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b> . Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.  See comments on additional mitigation throughout this document.	Thurrock Council acknowledges the additional mitigation measures are set out in the Environmental Statement and that it is National Grid's responsibility to ensure their implementation. We would also ask that National Grid considers the council's other statements in regard to mitigation that are discussed in the rest of this document.	Under discussion
<b>EIA – Assessment Conclusions</b>				
3.12.10	Construction effects	The assessment of effects during construction is presented in Section 17.4 and 17.5 of <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b> . The assessment of effects during construction presented is considered appropriate.	Thurrock Council agrees that the assessment of effects during construction is appropriate. However, the council requests further cumulative visualisations illustrating the Tilbury North Substation with Lower Thames Crossing.	Under discussion
3.12.11	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Sections 17.4 and 17.5 of <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [REP4-163 submitted at Deadline 4.]</b> . The assessment of effects during operation (and maintenance) presented is considered appropriate.	Thurrock Council agrees that the assessment of effects during construction is appropriate. However, the council requests further cumulative visualisations illustrating the Tilbury North Substation with Lower Thames Crossing.	Under discussion
<b>Draft DCO / Outline Management Plans / Mitigation and Monitoring</b>				
3.12.12	Outline CoCP	<b>7.2 Outline Code of Construction Practice [REP4-164 submitted at Deadline 4.]</b> includes all relevant construction related mitigation measures specified in <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b> and is appropriate for managing construction impacts from the Project.	Thurrock Council acknowledges the construction related mitigation measures are set out in the Environmental Statement and the Outline CoCP and that it is National Grid's responsibility to ensure their implementation. We would also ask that National Grid considers the council's other	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		See comments on mitigation throughout this document.	statements in regard to mitigation that are discussed in the rest of this document.	
<b>Other matters as required</b>				

### 3.13 Development Consent Order

Table 3.13 Matters Agreed, Not Agreed or Under Discussion in Relation to Development Consent Order

With the exception of Schedule 3 (Requirements) and Schedule 4 (Discharge of Requirements), both of which are addressed below, please refer to Appendix A – Draft Development Consent Order, for matters relating to the **3.1 Draft Development Consent Order [REP4-037]**.

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.13.1	DCO Requirements – Stages of authorised development	<p>The Applicant notes that all pre-commencement operations must be carried out in accordance with the outline construction management plans, as well as the outline archaeological mitigation strategy and outline written scheme of investigation. Requirement 3(1) requires the Applicant to give the relevant planning authority written notice of the anticipated programme for the carrying out of pre-commencement operations no less than seven days before those pre-commencement operations are first carried out.</p> <p>The Applicant considers that the outline management plans provide effective control over these excluded works and operations, noting that the approach mirrors that adopted on other recent projects, including the Bramford to Twinstead project.</p>	<p>Requirement 3 – Stages of an authorised development</p> <p>The Council has raised concerns regarding the definition of “pre-commencement operations” in Article 2(1) of the draft DCO. The definition (interpretation) of “pre-commencement operations” includes investigations and surveys. The Council understands this to encompass both intrusive and non-intrusive activities. The Council considers it inappropriate that such works may proceed without prior approval or formal agreement from the Council. Notification alone does not provide the Council with sufficient control to ensure that works are properly scoped, managed, and insured, nor</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>The Applicant cannot accept submissions under Requirement 3(1) being for approval by the relevant planning authority. There are, amongst other things, specialist technical considerations and tight programme constraints that factor into the proposed stages and programming of the authorised development. Submitting these for approval risks severely delaying the Applicant's ability to begin construction of the development and to achieve energisation by 2030.</p> <p>The Applicant considers that the proposed notice period for the anticipated programme for the carrying out of pre-commencement operations is appropriate, given that there is no requirement for the relevant authority to take any further action or other positive step(s) within that period. However, the Applicant has adjusted this proposed notice period to a 'business day' equivalent of 'five business days' for consistency of terminology throughout <b>3.1 Draft DCO [REP4-037]</b>.</p> <p>The Applicant considers it is unlikely that the two parties will find a mutually agreed position, and therefore suggest this matter is moved to Not Agreed.</p>	<p>does it secure appropriate reinstatement obligations.</p> <p>The Council's position remains that</p> <ul style="list-style-type: none"> <li>• A Licence Agreement must be in place prior to entry onto Council-owned land;</li> <li>• Full details of the proposed investigations/surveys must be submitted and approved in writing before works commence;</li> <li>• Appropriate method statements, risk assessments and reinstatement proposals must be agreed in advance.</li> </ul> <p>The Council also notes that seven days' notice is insufficient for meaningful review and there is no express mechanism preventing works from proceeding where concerns are raised within the notice period. The Council request that the seven-day notice period is extended or replaced with a prior approval mechanism. Also, that demolition is removed from the definition of pre-commencement operations unless expressly approved by the relevant planning authority.</p>	
3.13.2	DCO Requirements – Design and layout plans (elevations)	<p>The Applicant is unclear what purpose the proposed tailpiece serves, given both "in general accordance" and "unless otherwise agreed" are linked to any materially new and materially different environmental effects and therefore the Applicant has not amended <b>3.1 Draft DCO [REP4-037]</b>.</p>	<p>Requirement 6 – Design and layout plans</p> <p>The Council requests that the drafting of Requirement 6(1) is amended as follows:</p> <p>"(1) The authorised development must be carried out in general accordance with the levels shown on the design and layout plans</p>	Not Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.13.3	DCO Requirements – Construction hours	<p>The Applicant has provided a detailed response regarding the proposed construction hours to DCO 1.S10 in <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>.</p> <p>The proposed construction core working hours (unless otherwise approved by the Local Planning Authority) are:</p> <ul style="list-style-type: none"> <li>Monday – Friday: 07:00 to 19:00</li> <li>Saturday, Sunday and bank holidays: 07:00 to 17:00</li> </ul> <p>Details relating to the proposed construction working hours and any associated restrictions are contained within <b>6.4 Environmental Statement Chapter 4 - Project Description [APP-130]</b>. The working hours are secured through Requirement 7 of Schedule 3 of <b>3.1 Draft DCO [REP4-037]</b>.</p> <p>The construction works are largely linear and would not occur along the entire length of the Project for the full duration of the construction programme. Rather, there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday.</p>	<p>(elevations) unless otherwise agreed in writing with the relevant planning authority."</p> <p>Core working hours</p> <p>Requirement 7 of Schedule 3 of the draft Development Consent Order (DCO) (APP-056 - Document 3.1 – Draft DCO) sets out the core working hours proposed by NG. These are 07:00 to 19:00 on Monday to Friday and 07:00 to 17:00 on Saturdays, Sundays, Bank Holidays, and other public holidays.</p> <p>The core working hours as proposed extend significantly beyond Thurrock Council's standard core working hours, which are 08:00 to 18:00 on Monday to Friday, 08:00 to 13:00 on Saturdays, and no works on Sundays, Bank Holidays, and other public holidays.</p> <p>The core working hours as proposed by NG are expected to cause noise and disruption to residents beyond what Thurrock Council considers reasonable. A Section 61 prior consent is recommended for extended or night-time work, especially near sensitive receptors and for particularly disruptive activities such as piling.</p>	Not Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>The defined core working hours provides essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and bank holidays. This flexibility is critical to maintaining programme resilience, allowing the Project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption, seasonal restrictions and access constraints.</p> <p>Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing consequential delay to the overall programme, and to enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment.</p> <p>A blanket prohibition on Sunday and bank holiday working would remove this necessary flexibility, increasing the risk of programme slippage, inefficient stop-start working, and a longer overall construction period, which would itself result in greater long-term exposure to construction impacts than occasional controlled working on those days. Such a restriction would also undermine the deliverability of this critical national priority project, where timely delivery is in the public interest.</p> <p>The assessment within the Environmental Statement (ES) (Volume 6 of the DCO application) is based on</p>		

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
		<p>a set of parameters. These, this includes the core working hours for the construction phase of the Project.</p> <p><b>6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]</b> assessed the impact to sensitive receptors from noise and vibration during the construction phase. The assessment concluded that, with the embedded mitigation and controls set out in <b>7.2 Outline Code of Construction Practice [REP4-164]</b>, significant effects from noise and vibration during the construction phase are not anticipated. The measures set out within <b>7.2 Outline Code of Construction Practice (Revision C) [REP4-164]</b> will be secured via Requirement 4(a) (Construction Management Plans) of <b>3.1 Draft DCO [ REP4-037]</b> within the final Code of Construction Practice.</p> <p>With regards to evening, weekend, and night-time working (where required), construction noise will be assessed against the relevant 'ABC' threshold for the respective period. Should the thresholds be predicted to be exceeded for specific works, including mitigation (based on the detailed assessments to be undertaken by the contractor as secured by NV05 of <b>7.2 Code of Construction Practice [REP4-165]</b>), temporal restrictions may be put in place at specific locations for specific works to ensure significant adverse effects do not to occur. Such temporal restrictions would form part of BPM measures to control noise impacts, as secured by NV01 of <b>7.2 Code of Construction Practice [REP4-165]</b>.</p>		

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.13.4	DCO Requirements – Reinstatement planting plan	<p>The drafting of <b>3.1 Draft DCO [REP4-037]</b> makes clear that the latest point at which the reinstatement planting works may be carried out is the first available planting season after the relevant part of the authorised development is brought into operational use.</p> <p>The Applicant does not consider it necessary to amend the wording of Requirement 9(4). The Applicant may find itself in a situation where it could carry out reinstatement planting in the current planting season, rather than waiting until the next planting season.</p> <p>The wording proposed has been selected to reflect the scale of the Project, the level of detailed design at the time, and to ensure sufficient flexibility to respond to such final design proposals as will be agreed with the relevant authority as prescribed in <b>3.1 Draft DCO [REP4-037]</b>. The proposed reinstatement plan will be submitted to the relevant planning authority for approval and the reinstatement works must then be carried out in accordance with the approved plan.</p>	<p>Requirement 9 – Reinstatement planting plan</p> <p>The Council has raised in its Local Impact Report that it is concerned with prolonged construction impacts on landscape receptors, PRowS, visual amenity; coordination with the LTC mitigation planting; early delivery of planting to offset visual harm, loss of screening and amenity impacts etc. The Requirement as drafted does not guarantee early planting and also allows planting to be postponed until a potentially late operational trigger.</p> <p>The Council considers that the requirement to be "in general accordance with the outline landscape and ecological management plan" is too uncertain and subjective. The Council requests the draft DCO be updated to remove reference to "general" to remove the ambiguity about how this Requirement will be adhered to.</p>	Under discussion
3.13.5	DCO Requirements – Reinstatement schemes	<p>The 21-month period links back to the time period in Article 27 (Temporary use of land by the Applicant) and Article 28 (Temporary use of land by UKPN) of <b>3.1 Draft DCO [REP4-037]</b>, in which the undertaker is not permitted to remain in possession of the land without the consent of the owners after the end of a period of 21 months.</p> <p>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.</p>	<p>The Council considers that 21 months is a prolonged period during which land may remain in a disturbed or substandard condition which may result in extended visual, environmental and amenity impacts.</p> <p>The Council considers that reinstatement should occur within 12 months or as soon as reasonably practicable following completion of construction in each area, rather than allowing a blanket 21-month period.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.13.6	DCO Requirements – Additional requirements	<p>The Applicant notes this comment and has provided further information into the Examination at Deadline 1 and an update at Deadline 4 in the form of <b>8.2 Drainage Strategy DCO [REP4-186]</b>. The Strategy has been drafted in accordance with both the National Standards for Sustainable Drainage Systems (SuDS) and Lead Local Flood Authority (LLFA) local guidance, which will be evidenced.</p> <p>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.</p>	<p>The Council notes that the <b>Outline Code of Construction Practice (CoCP) [APP-300]</b> includes a commitment (commitment reference GG22) that the Main Works Contractor(s) will prepare a Surface Water Management Plan to inform discharge of DCO Requirement 4.</p> <p>The Council is concerned that the Applicant has not made a commitment that the Surface Water Management Plan must be in accordance with the national Sustainable Drainage System (SuDS) standard.</p>	Under discussion
3.13.7	DCO Requirements – Additional requirements	<p>As confirmed in the Applicant's response to the Examining Authority's question SET 1.15, which is found in <b>8.9.1 Applicant's Responses to First Written Questions [REP3-074]</b>, the Applicant has engaged with the host authorities and submitted <b>8.13 Outline Employment and Skills Plan [Revision A]</b> into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that the Applicant and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project.</p> <p>The commitment to implementing the project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement in an update to <b>3.1 Draft DCO [REP4-037]</b>.</p>	<p>The Council has requested a Local Procurement and Skills Framework, maximising opportunities for Thurrock based businesses and residents, proportionate to the scale and duration of works that includes local employment and skills opportunities and commitments. The Applicant should consider incorporating such measures into the draft DCO as a new Requirement.</p>	Under discussion
3.13.8	DCO Requirements	<p>Requirement 4 of <b>3.1 Draft DCO [REP4-037]</b> requires the preparation, submission and discharge of control documents relevant to each stage of the</p>	<p>The Council has requested the incorporation of a site-specific mitigation scheme into the draft DCO as a new Requirement.</p>	Under discussion

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
	– Additional requirements	<p>authorised development, with the stages first provided to the Local Planning Authority prior to pre commencement operations, via Requirement 3. The delivery of site-specific control documents is therefore secured.</p> <p>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.</p>		
3.13.9	DCO Requirements – Additional requirements	<p>Commitment GH08 in <b>7.2 Outline Code of Construction Practice [REP4-164]</b> secures the requirement for a protocol for dealing with any unexpected contamination. These measures will be secured via Requirement 4(1)(a) (Construction Management Plans) of <b>3.1 Draft DCO [REP4-037]</b> within the final Code of Construction Practice.</p> <p>The evaluation of contamination of land or groundwater and controlled waters is therefore secured.</p> <p>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.</p>	<p>The Council has requested the incorporation of a written scheme for the evaluation of contamination of land or groundwater and controlled waters into the draft DCO as a new Requirement.</p>	Under discussion
3.13.10	DCO Requirements – Additional requirements	<p>The effects on Recreation and Leisure are set out in the <b>6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]</b> and all proposed mitigation measures are detailed within <b>7.2 Outline Code of Construction Practice [REP4-037]</b> and in <b>7.6 Outline Public Rights of Way Management Plan [REP4-178]</b>, therefore the Applicant does not consider a Recreation and Leisure Management Plan is necessary.</p>	<p>The Council has requested the incorporation of a Recreation &amp; Leisure Management Plan ("RLMP"), setting out protection of parks/open spaces, event scheduling, and communications into the draft DCO as a new Requirement.</p>	Not Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.13.11	DCO Requirements – Applications made under requirements	<p>The Planning Performance Agreements (PPA) currently in place are relevant to the pre-Application, Application and Examination phases. Post-consent PPAs would deal with matters following grant of development consent and the Applicant will continue to engage with the Council to discuss and progress appropriate post-consent PPAs.</p> <p>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.</p>	<p>Schedule 4(1)(1) – Discharge of Requirements</p> <p>This part of Schedule 4 provides that a relevant authority must give notice to the undertaker of its decision on any application made by the undertaker for consent, agreement or approval required by a Requirement within 28 days. The Council requires that the time period matches the period that is contained in the final, agreed version of the Planning Performance Agreement between the Council and the Applicant.</p>	Under discussion
3.13.12	DCO Requirements – Further information	<p>Given the Project's status as a project of critical national priority, the Applicant considers five business days for the relevant discharging authority to request additional information to be proportionate and appropriate.</p> <p>The Applicant has updated <b>3.1 Draft DCO [REP4-037]</b> to replace the five-day period for the request of further information to five 'business days' for consistency of terminology.</p> <p>Paragraph 2(4) of Schedule 4 allows the relevant authority to seek the Applicant's consent to request further information after the five business day period if necessary.</p> <p>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.</p>	<p>Schedule 4(2)(2) – Discharge of Requirements</p> <p>The Council considers this matter can be moved to agreed.</p>	Agreed

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
3.13.13	DCO Requirements - Fees	<p>The Applicant has updated the proposed fee to align with the current national guidance in <b>3.1 Draft DCO [REP4-037]</b>.</p> <p>The Applicant considers that through ongoing engagement between the parties, this matter can be moved to Agreed.</p>	<p>Schedule 4(3) – Discharge of Requirements</p> <p>The Council notes that the Draft DCO has been updated to align with the current national guidance. The Council would require the drafting of this Schedule to state that the proposed fee would increase in line with national planning fees.</p>	Under discussion

Other matters as required

### 3.14 Other Matters

## Appendix A draft DCO wording

Table A.1 Comments on draft DCO

ID	Matter	National Grid's Position	Thurrock Council's Position	Status
A.1.1	DCO Wording – Definition of “Maintain”	<p>The Applicant acknowledges that works of alteration, improvement, reconstruction or replacement could vary in their scale and significance, and that is precisely why the control, “provided such works do not give rise to any materially new or materially different environmental effects to those identified in the environmental statement”, is included in the definition of “maintain”.</p> <p>The Applicant's position is that the assessment as to whether maintenance activities result in a new or materially different environmental effect should remain with the Applicant, noting that a failure of the Applicant to comply with a term of the DCO would be an offence that can be enforced by the relevant planning authority under Part 8 of the Planning Act 2008.</p>	<p>As stated in various Local Impact Reports, the definition of “maintain” includes a wide range of specified operations in relation to the authorised development which can be undertaken subject to those works not giving rise to any materially new or materially different environmental effects to those identified in the Environmental Statement.</p> <p>The Applicant refers to precedent and that is not necessary or appropriate for there to be any external oversight of what is new or materially different. The Applicant also refers to its statutory duty to maintain a safe and efficient transmission network. However, it is considered this has little bearing on the whether those works covered by the definition of maintain have any new or additional environment effects.</p> <p>It is acknowledged that certain works including inspect, repair, dismantle, remove, clear, refurbish, paint, surface treat, decommission, are unlikely to give rise to new or materially different environmental effects. However, works involving alteration, improvement, reconstruction or replace which are covered by the current definition</p>	Under discussion

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			<p>do retain the potential to give rise to new or materially different environmental effects.</p> <p>If these operations are to remain within the definition of maintain, Thurrock Council is of the opinion that to provide clarity and avoid any dispute, the DCO should incorporate a mechanism for determining whether such maintenance works give rise to materially new/different environmental effects.</p> <p>It therefore considers that the definition of 'maintain' should be amended to include "provided such works do not, in the opinion of the local planning authority, give rise to any materially new or materially different environmental effects to those identified in the Environmental Statement, and any derivative of "maintain" must be construed accordingly."</p>	
A.1.2	DCO Wording – Pre-commencement operations	<p>The Applicant has carefully considered the definition of 'pre-commencement operations' to ensure it is suitable for the specific circumstances of the Norwich to Tilbury Project.</p> <p>All pre-commencement operations must be carried out in accordance with the outline construction management plans, as well as the outline archaeological mitigation strategy and outline written scheme of investigation. Requirement 3(1) requires the Applicant to give the relevant planning authority written notice of the anticipated programme for the carrying out of pre-commencement operations no less than seven days before those pre-commencement operations are first carried out. National Grid considers that the</p>	<p>Article 2 (Interpretation) – definition of "pre-commencement operations)</p> <p>The current definition of "pre-commencement operations" in Article 2(1) (Interpretation) of the <b>draft DCO [APP-056]</b> includes investigations and surveys, which the Council understands would apply to both intrusive and non-intrusive investigations and surveys. Under Article 3(1) (Stages of authorised development) of the draft DCO, unless otherwise agreed with the relevant planning authority, written notice of the anticipated programme for these operations must be given to the relevant planning authority.</p>	Under discussion

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		<p>outline management plans provide effective control over these excluded works and operations, noting that the approach mirrors that adopted on other recent projects, including the Bramford to Twinstead project.</p> <p>If made, the draft Development Consent Order includes authority for the undertaker to survey and investigate the land (Article 22 Authority to survey and investigate the land). Prior to the coming into force of the development consent order, the undertaker would need to obtain the necessary landowner consents to enter the land for the purpose of the surveys.</p> <p>The Applicant has not currently identified any buildings that would need to be demolished. If demolition was to be required, it would be due to unforeseen circumstances and, given the Project's status as one of Critical National Priority, the Applicant does not consider it proportionate to obtain prior approval.</p>	<p>The Council is concerned that the current provisions of the draft DCO permits the carrying out of investigations and surveys, regardless of whether these are intrusive or non-intrusive, without agreement of the Council. The Council requires that, at a minimum, a Licence Agreement and details of the investigation(s)/survey(s) must be agreed and in place prior to the carrying out of those pre-commencement operations.</p> <p>The definition of "pre-commencement operations" also includes "demolition of existing buildings". The Council requires that its prior approval is sought and granted before demolition of any building(s) where the building(s) lies within an area where it is the competent authority.</p>	
A.1.3	DCO Wording – Definition of “relevant planning authority”	<p>Where local government reorganisation results in more than one successor authority across a current given area — as may well occur across Essex — the definition will automatically identify the correct authority by tier and geography for each area covered by any given provision of the Order. The definition of "relevant planning authority" is already optimally structured from a statutory drafting perspective to address the scenario Thurrock describes. First of all, (a) and (b) of the definition operate provision by provision of the Order to identify a single relevant planning authority where statute otherwise anticipates that there could be</p>	<p>Thurrock Council is satisfied with the Applicant's proposed definitions of 'relevant planning authority' and 'relevant county planning authority'. The Council is of the view that it removes any ambiguity from previous terminology and limb (b) of the former term adequately recognises the functions unitary authorities, like Thurrock Council, exercise as single-tier authorities undertaking both county and district planning functions.: "(b) for an area to which the provision relates in respect of which there is only one local planning authority for</p>	Under discussion

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		<p>different administrative tiers (i.e. a district vs county authority). Then the definition, having identified the relevant tier, anchors that single relevant planning authority geographically as being the one for "the area to which the provision relates" in each case.</p> <p>The proposed addition of "or successors" (plural) is unnecessary: the reference to a single "successor" in the current drafting remains fit for purpose even where there is more than one successor authority for what is currently a single one. Section 6(c) of the Interpretation Act 1978 provides that words in the singular in the Order include the plural (and vice versa) unless a contrary intention appears, and there is no plausible argument that a contrary intention appears in the Order preventing multiple successors constituting the relevant planning authority for their inherited areas. A separate geographic tie-breaker would simply restate what the definition already achieves and is therefore unnecessary.</p> <p>There is no reason for the Order to deviate from paragraphs 1.3.1 to 1.3.5 of the GOV.UK drafting guidance (2024-03-19 Drafting guidance - GOV.UK) for statutory instruments (such as the Order) which are clear that more words should not be used than are necessary because this introduces interpretive uncertainty rather than removing it: where additional words are inserted, a reader may infer that they were intended to fill a perceived gap, raising questions about what the original drafting was understood not to cover. The current drafting is both legally sufficient and preferable on that basis.</p>	<p>the purposes of that Part, that one local planning authority,"</p> <p>Revision C has already inserted "any successor exercising its functions as local planning authority" within the definition of "relevant planning authority". That is welcome. However, the wording should refer to "any successor or successors in function". Where a predecessor authority's area falls across the boundary of more than one new unitary, which could be the case across Essex in particular, given that the existing districts and boroughs in the Order Limits will be reorganised into five new unitary authorities there may be more than one successor authority for what is currently a single ECC or district function. A "successor in function" reference in the singular leaves that ambiguous on the face of the Order.</p> <p>Article 2(8) (which provides that references in the Order to any statutory body include that body's successor in respect of functions relevant to the Order) should be amended in two ways: to include the plural ("successor or successors"), and to add a tie-breaker for the situation in which a function is split across more than one successor authority. The following wording is suggested: "References in this Order to any statutory body include that body's successor or successors in respect of functions which are relevant to this Order and, where there is</p>	

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			<p>more than one such successor, the successor authority for the area to which the relevant provision relates."</p> <p>That reflects how Structural Changes Orders typically allocate functions on reorganisation and avoids the risk of the Order being read as requiring all successors jointly to discharge a function that, after reorganisation, will sit with one of them by reference to area.</p>	
A.1.4	DCO Wording – Limits of Deviation	<p>The limits of deviation described in Article 5 and shown on the Works Plans and Tables of Parameters have been assessed for the purposes of the Environmental Statement. This, together with the Project's status as one of Critical National Priority and the need to energise the Project by 2030, means that it is disproportionate to include controls seeking prior approval for movement within the limits of deviation from the planning authorities within the <b>3.1 Draft Development Consent Order [REP4-037]</b>.</p> <p>Where the assessment identified any particularly sensitive heritage receptors, additional mitigations was identified and is secured in the <b>7.2 Outline Code of Construction Practice [REP4-164]</b></p>	<p>Article 5 – Limits of deviation</p> <p>The current drafting of Article 5(1) permits the undertaker to deviate from controls and restrictions that would otherwise apply, for example in circumstances such as those set out in Article 5(1)(b) with regard to pylon works. The carrying out of works within the limits of deviation does not require the undertaker to seek prior approval from the relevant planning authority. As such, the Council is concerned that the <b>Outline CoCP [APP-300]</b> does not contain any specific commitments that apply to works in sensitive areas such as listed building or conservation areas.</p> <p>The Council requests that the Applicant clarifies its approach to the carrying out of works in sensitive areas such as listed building or conservation areas and includes a commitment within the Outline CoCP and/or by another mechanism secured within the draft DCO that would safeguard these areas.</p>	Under discussion

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A.1.5	DCO Wording – Street Works	<p>The Applicant shared the draft protective provisions in favour of the Highways Authorities on 22 July 2025 with Thurrock Council and requested any comments. This version of the Protective Provisions was then included in the DCO at submission, pending negotiation with the Highways Authorities. Whilst the Applicant has not yet received any response to this from Thurrock Council, it has received some initial comments from Essex County Council and it is noted from correspondence with Norfolk County Council that the Highways Authorities are jointly appointing legal advisors to advise in relation to the Protective Provisions (or a joint highways framework Agreement). Confirmation of the legal advisors acting is awaited.</p> <p>It is the Applicant's understanding that the Highways Authorities are seeking a joint highways framework agreement in lieu of protective provisions, which the Applicant will seek to negotiate with the Highways Authorities provided it can be concluded before the end of the Examination. A draft of this agreement was shared on the week commencing 23 February 2026 (along with updated Protective Provisions to reflect Essex County Council's comments) to all the Highways Authorities and we await comments.</p>	<p>Article 11 – Street works</p> <p>Article 11 grants the undertaker wide-ranging powers, including those which can be carried out without the consent of the street authority under Article 11(1).</p> <p>The Council notes that the draft DCO <b>[APP-056]</b> contains Protective Provisions for the protection of the highway authorities (at Part 4 of Schedule 16). These Protective Provisions must contain adequate protections that ensure the Council as Local Highway Authority is not subject to detriment as a result of the carrying out of the authorised development. The Council may make further submissions on the content of these Protective Provisions.</p>	Under discussion
A.1.6	DCO Wording – Street Works	<p>National Grid has had regard to feedback received from host authorities and the Examining Authority both on the duration of the decision period and the consistency of the use of 'days' and 'business days' and (with the exception of the timings in Schedule 16 (protective provisions) which remain under discussion with the relevant stakeholders) has</p>	<p>Article 11(3) – Street works</p> <p>The draft DCO <b>[APP-056]</b> provides at Article 11(3) that:</p> <p>"If a street authority that receives an application for consent under paragraph (2) fails to notify the undertaker of its decision within 28 days (or such other period agreed</p>	

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		<p>revised its proposed 28 day decision period to instead allow 25 business days. This new decision period was selected to provide a 'business day' equivalent to the 35 day period on the National Grid (Bramford to Twinstead Reinforcement) Order 2024, ensuring that decision periods are not curtailed over bank holidays. National Grid considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. National Grid's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.</p> <p>In practical terms, the Applicant would anticipate working closely with Thurrock Council and other relevant authorities to provide advance notice, where practicable, of any requests for approval to which a deeming provision would apply under the draft DCO.</p>	<p>by the street authority and the undertaker) beginning with the date on which the application was received, that authority will be deemed to have granted consent."</p> <p>Thurrock Council raises concern regarding the proposed deemed consent mechanism whereby, if the street authority fails to notify the undertaker of its decision within 28 days, consent is automatically granted. While the Council recognises the need for procedural efficiency in delivering the Project, the proposed drafting presents the following concerns:</p> <ol style="list-style-type: none"> <li>1. Insufficient Determination Period <ul style="list-style-type: none"> <li>A 28-day period may be inadequate where applications involve: <ul style="list-style-type: none"> <li>• Technical highway design review</li> <li>• Road safety audits</li> <li>• Drainage and structural considerations</li> <li>• Traffic management impacts</li> <li>• Consultation with internal departments or third parties</li> <li>• Technical Assessment of CAT0, 1 or 2 structures is required</li> </ul> </li> </ul> </li> </ol> <p>Highway-related submissions frequently require detailed engineering assessment. The automatic grant of consent due solely to administrative timescales could prejudice highway safety and network integrity.</p>	

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		<p>Article 11(3) (street works) of the draft Development Consent Order allows the parties to agree “such other period” for the deemed approval process as may be necessary and appropriate to account for circumstances where the application is incomplete. The Applicant anticipates working closely with Thurrock Council to ensure that both parties are aligned with what information would be needed to obtain the necessary consents and to avoid any unnecessary delays.</p> <p>National Grid remains in ongoing dialogue with Thurrock Council to ensure that the impacts of the Project are appropriately managed and mitigated.</p>	<p>2. Risk to Statutory Duties</p> <p>As highway authority, the Council has statutory duties under the Highways Act 1980 to ensure the safe and efficient operation of the highway network. The deemed consent provision could undermine the Council's ability to properly discharge those duties if consent is granted by default rather than through technical approval.</p> <p>3. Lack of Safeguard for Incomplete Submission</p> <p>The drafting does not expressly provide that the 28-day period commences only upon receipt of a “complete” application. Without such clarification, there is potential for the undertaker to submit insufficient information, thereby triggering the deemed consent mechanism before proper assessment can occur.</p> <p>The Council therefore requests that:</p> <ul style="list-style-type: none"> <li>• The determination period be extended to a minimum of 42 days; and/or</li> <li>• The deemed consent provision be removed in respect of highway authority approvals; and/or</li> <li>• The period should only commence once the authority confirms in writing that a complete submission has been received; and</li> </ul>	

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			<ul style="list-style-type: none"> <li>Deemed consent should not apply where further information has reasonably been requested within the determination period.</li> </ul> <p>Where Technical Assessment of CAT0, 1 or 2 structures is required, the Council will require an extension of this period by up to 3 months</p>	
A.1.7	DCO Wording – Power to alter layout, etc. of streets	<p>The powers contained in Article 14(1) which do not require the consent of the street authority relate to those streets specified in column (1) of Parts 1 or 2 of Schedule 6 (streets subject to alteration of layout) and in the manner described in column (2) of those parts of Schedule 6.</p> <p>The powers conferred by Article 14(2)(a) can be exercised on streets not listed in Schedule 6 but only with the consent of the street authority.</p> <p>The Applicant notes the Council's position on the imposition of requirements and remains in ongoing dialogue with Thurrock Council to ensure that the impacts of the Project are appropriately managed and mitigated.</p>	<p>Article 14 – Power to alter layout, etc. of streets</p> <p>The Council notes that the powers contained in Article 14 are wide-ranging and under Article 14(1) may be carried out with[out] the consent of the street authority. This includes the power to permanently or temporarily alter the layout of streets where the Council is the relevant street authority. Article 14(2) also confers wide-ranging powers to the undertaker regarding streets but is subject to Article 14(4), meaning that paragraph (2) may not be exercised without the consent of the street authority (such consent not to be unreasonably withheld or delayed).</p> <p>Where the Council is the relevant street authority, it may set requirements for its consent to be granted, such as a safety audit where powers under Article 14(2)(a) are proposed to be exercised by the undertaker. Any application for consent would be considered against all the relevant issues, such as the route and traffic usage on that route. The Council may also grant its</p>	Under discussion

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			<p>consent subject to certain conditions such as liaison with the Council's Highways Maintenance team, which may have specific requirements for surfacing for roads and their traffic levels.</p> <p>The Council expects that powers exercised under Article 14(2) would only be done so in consultation with the relevant highway authority.</p>	
A.1.8	DCO Wording – Temporary closure of streets and public rights of way	<p>The Applicant shared the draft protective provisions in favour of the Highways Authorities on 22 July 2025 with Thurrock Council and requested any comments. This version of the Protective Provisions was then included in the DCO at submission, pending negotiation with the Highways Authorities. Whilst the Applicant has not yet received any response to this from Thurrock Council, it has received some initial comments from Essex County Council and it is noted from correspondence with Norfolk County Council that the Highways Authorities are jointly appointing legal advisors to advise in relation to the Protective Provisions (or a joint highways framework Agreement). Confirmation of the legal advisors acting is awaited.</p> <p>It is the Applicant's understanding that the Highways Authorities are seeking a joint highways framework agreement in lieu of protective provisions, which the Applicant will seek to negotiate with the Highways Authorities provided it can be concluded before the end of the Examination. A draft of this agreement was shared on the week commencing 23 February 2026 (along with updated Protective Provisions to reflect Essex</p>	<p>Article 16 – Temporary closure of streets and public rights of way</p> <p>Some of the powers that may be exercised by the undertaker under Article 16 do not require prior approval by the relevant highway authority. For example, Article 16(1) provides that the undertaker may temporarily close, alter or divert any street or public right of way shown on the access, rights of way and public rights of navigation plans or within the Order limits and may for any reasonable time divert the traffic from the street or public right of way and subject to paragraph (3), prevent all persons from passing along the street or public right of way.</p> <p>The Council is concerned that where prior approval by the relevant highway authority is not required, service users of highways may not be adequately protected and suitable alternative provisions may not be provided by the undertaker. The Applicant must ensure that suitable protections are included in the Protective Provisions of the</p>	Under discussion

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		County Council's comments) to all the Highways Authorities and we await comments.	draft DCO or a separate side agreement be entered with the Council as highways authority.	
A.1.9	DCO Wording – Access to works	<p>The Applicant shared the draft protective provisions in favour of the Highways Authorities on 22 July 2025 with Thurrock Council and requested any comments. This version of the Protective Provisions was then included in the DCO at submission, pending negotiation with the Highways Authorities. Whilst the Applicant has not yet received any response to this from Thurrock Council, it has received some initial comments from Essex County Council and it is noted from correspondence with Norfolk County Council that the Highways Authorities are jointly appointing legal advisors to advise in relation to the Protective Provisions (or a joint highways framework Agreement). Confirmation of the legal advisors acting is awaited.</p> <p>It is the Applicant's understanding that the Highways Authorities are seeking a joint highways framework agreement in lieu of protective provisions, which the Applicant will seek to negotiate with the Highways Authorities provided it can be concluded before the end of the Examination. A draft of this agreement was shared on the week commencing 23 February 2026 (along with updated Protective Provisions to reflect Essex County Council's comments) to all the Highways Authorities and we await comments.</p> <p>The Applicant responds to Thurrock's comments on deemed consent provisions in relation to Article 11 above and does not repeat its response here.</p>	<p>Article 17 – Access to works</p> <p>The Council notes that Article 17(1)(a) permits the undertaker to form and lay out new means of access, or improve existing means of access, at locations specified in Schedule 9. The Council will need to ensure that all such accesses within its administrative area are acceptable in highway safety, traffic management, and structural terms. The Council therefore expects that detailed design approval, including construction methodology and reinstatement details, will be secured through appropriate protective provisions or requirements.</p> <p>In relation to Article 17(1)(b), the Council has particular concern regarding:</p> <ol style="list-style-type: none"> <li>1. Breadth of Undertaker Discretion <ul style="list-style-type: none"> <li>The power to form or improve "such other means of access... as the undertaker reasonably requires" within the Order limits is broad. While subject to street authority consent, the drafting gives significant flexibility to the undertaker without clearly defined assessment criteria. The Council considers that clearer parameters should apply to:</li> </ul> </li> </ol>	Under discussion

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			<ul style="list-style-type: none"> <li>• The scale and type of access permitted;</li> <li>• Traffic generation and construction vehicle routing implications;</li> <li>• Impacts on the local highway network, including sensitive rural lanes and residential roads.</li> </ul> <p>2. Deemed Consent Mechanism (Article 17(2))</p> <p>The deemed consent provision presents a material risk to the Council in its capacity as highway authority</p> <p>A 28-day determination period may be insufficient where:</p> <ul style="list-style-type: none"> <li>• The access has safety implications;</li> <li>• Technical review is required (e.g. swept path analysis, Stage 1/2 Road Safety Audit, drainage assessment);</li> <li>• Internal consultation or committee reporting is necessary.</li> <li>• The Council is concerned that failure to respond within 28 days results automatically in deemed consent, regardless of complexity. This could undermine proper highway assessment and public safety considerations.</li> </ul> <p>The Council therefore recommends that:</p> <ul style="list-style-type: none"> <li>• The determination period be extended to a minimum of up to 42 days and/or</li> </ul>	

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			<ul style="list-style-type: none"> <li>Deemed consent should not apply in relation to highway authority functions and/or</li> <li>Deemed consent should only apply where sufficient supporting technical information has been provided and agreed as complete.</li> </ul>	
A.1.10	DCO Wording – Temporary use of Land	Article 27(5) (temporary use of land by National Grid) requires, as an overarching point of principle, the Applicant to remove all temporary works and restore the land to the reasonable satisfaction of the landowner. The primary purpose of the drafting of Article 27(5)(b) is to ensure that any mitigation works put in place as part of the temporary works do not need to be removed, as to do so would be counterintuitive.	Article 27(5)(b) – Temporary use of land by National Grid This Article provides that National Grid is not required to restore the land on which any works or mitigation works have been carried out under paragraph (1)(d), which applies to. The Council requires a commitment from National Grid that it would restore such land as this land should not be subject to detriment as a result of the implementation of the DCO.	Under discussion
A.1.11	DCO Wording – Traffic Regulation	The Applicant's justification for the approach taken in respect of Article 49 is set out in Paragraph 3.53 of the 3.2 Explanatory Memorandum <b>[REP4-039]</b> . As is noted in the Explanatory Memorandum, there is precedent for this approach in the National Grid (Bramford to Twinstead Reinforcement Project) Order 2024 (see Article 46). There is further precedent in the National Grid (Richborough Connection Project) Development Consent Order 2017 (see Article 39) and indeed in the Sizewell C (Nuclear Generating Station) Order 2022 (see Article 24).	Article 49 – Traffic regulation Article 49 grants broad powers to the undertaker that may have serious implications for the highways network, including the prohibition of use of roads by through traffic. The Council is concerned that such powers may be used by the undertaker unilaterally and without proper liaison with the relevant highway authority. The draft DCO should be updated so that Article 49 powers are available to the undertaker in consultation with the relevant highway authority. This will ensure that sufficient controls are in place to ensure the	Under discussion

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A.1.12	DCO Wording - Safeguarding	By making the requirement a local land charge the Applicant is seeking to enable local planning authorities to comply with this provision without an undue administrative burden and ensure the provision's effectiveness. Further, by registering the provision as a local land charge specifically rather than the DCO generally, this will ensure the safeguarding provision itself will become readily apparent to all concerned in the early stages of handling an application for planning permission.	highway network is not subject to unnecessary detriment as a result of the implantation of the DCO.  Article 56(6) – Safeguarding Article 56(6) provides that the requirement to consult under this article is a local land charge. The Council requests that the Applicant clarifies why this provision is necessary when by virtue of section 134 of the Planning Act 2008, the DCO would be registered as a local land charge. The Council is mindful that Article 56 may impose an additional and unnecessary administrative burden on the relevant local planning authority.	Under discussion
A.1.13	DCO Wording – Amendment of local legislation	The purpose of Article 59 is to ensure that the Applicant does not inadvertently breach local legislation, byelaws or other local enactments, some of which may be historic and not readily available in publicly accessible resources, that might interfere with the delivery of the Project. Notwithstanding the provisions of Article 59, the Applicant must comply with the protective provisions that are included in the draft Development Consent Order for the protection of the highways authorities. As such, the Applicant does not consider it necessary to amend the drafting of Article 59, which has precedent in the National Grid (Bramford to Twinstead Reinforcement) Order 2024.	Article 59(2)(a) – Amendment of local legislation This Article provides that a power conferred by the DCO may be exercised without regard to a specified enactment, or any other statutory provision of local application, that requires or permits a specified road, path, passage, bridge, parapet, fence or other place or structure to be kept open or maintained generally or in a specified manner. The Council does not consider that Article 59(4) provides sufficient protection to the Council's role as local highways authority. Article 59(4) must be exercised in consultation with the relevant highway authority.	Under discussion

## 4. Confirmation of Agreement

The above SoCG is agreed between National Grid and Thurrock Council on the date specified below.

Signed for and on behalf of National Grid:

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Date:

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Signed for and on behalf of Thurrock Council:

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Date:

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# Abbreviations

Abbreviation	Full Reference
AIL	Abnormal Indivisible Loads
AIS	Air Insulated Switchgear
AOD	Above Ordnance Datum
AONB	Area of Outstanding Natural Beauty
BNG	Biodiversity Net Gain
CoCP	Code of Construction Practice
CSE	Cable Sealing End
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
EACN	East Anglia Connection Node
EHO	Environmental Health Officer
EIA	Environmental Impact Assessment
ES	Environmental Statement
GI	Ground Investigation
GW	Gigawatt
LLFA	Lead Local Flood Authority
LVIA	Landscape and Visual Impact Assessment
NCR	National Cycle Route
NETS	National Electricity Transmission System
NPSs	National Policy Statements
PEIR	Preliminary Environmental Information Report
PRoW	Public Right of Way
SoCG	Statement of Common Ground
SoCC	Statement of Community Consultation
SPZ	Source Protection Zone
WFD	Water Framework Directive
WSI	Written Scheme of Investigation
ZoI	Zone of Influence
ZTV	Zone of Theoretical Visibility

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