

Thurrock Council, Civic Offices
New Road, Grays
RM17 6SL

21 July 2026

Your Reference: EN02007
Interested Party Number: [REDACTED]

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

Dear Ms Hunt,

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

Thurrock Council's Submission for Deadline 7

Following receipt of the Rule 8 letter dated 17 February 2026 Thurrock Council is writing to provide a response to the points raised as requirements of Deadline 7, as set out in the final examination timetable attached as Annex A.

- ***any further information requested by the ExA under rule 17 of The Infrastructure Planning (Examination Procedure) Rules 2010***

The Council's response to this point is attached in Appendix A – Thurrock Council's response to Rule 17 Letter dated 14 July 2026.

- ***the applicant's updated documents and application guide***
- ***comments on any further information/ submissions received by Deadline 6***

The Council's response to these points is attached in Appendix B – Thurrock Council's Comments on the Applicants Updated Documents.

- ***signed and dated statements of common ground***

Due to time constraints, the Council was unable to sign the Statement of Common Ground in advance of Deadline 7. The Applicant will submit a final, unsigned version of the document on the Council's behalf at Deadline 7, with the signed version to follow at Deadline 8.

Yours sincerely,



Interim Major Infrastructure Officer

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Appendix A – Thurrock Council's response to the Rule 17 Letter dated 14 July 2026

1. Response to Question 1.1

Requirement 11: Biodiversity Net Gain

At deadline 6 the applicant submitted a revised draft Development Consent Order (DCO) [REP6-030]. In Schedule 3 of [REP6-030] a new requirement 11 on biodiversity net gain has been included. Comments are sought on this additional requirement, including any alterations to any of the wording that you would recommend

- 1.1 Thurrock Council welcomes the inclusion of Requirement 11 within the revised draft DCO and supports the Applicant's commitment to securing a minimum 10% Biodiversity Net Gain (BNG) across the Order land.
- 1.2 However, while the Council do not object to the Applicant's "interim/final assessment" approach, which appears pragmatic for a project of this scale, the Council is concerned that Requirement 11 does not provide any mechanism for review, approval, or agreement by the relevant planning authority. As currently drafted, compliance with the requirement is capable of being determined solely by the undertaker through submission of the relevant assessments.
- 1.3 The Council considers that a Biodiversity Net Gain Strategy should be submitted and approved prior to commencement of development. Such an approach is commonly used on major infrastructure projects and would provide greater certainty regarding the proposed measures, delivery mechanisms, monitoring arrangements, and management commitments that will be relied upon to achieve the stated biodiversity net gain outcomes.
- 1.4 A pre-commencement Biodiversity Net Gain Strategy would ensure that the relevant planning authority has an opportunity to review and approve the methodology proposed to achieve biodiversity net gain, rather than only reviewing the outcome through assessments submitted before and after construction. This would provide greater confidence that biodiversity net gain has been embedded within the design and delivery of the development from the outset.
- 1.5 The Council further considers that the requirement should specify how the 10% biodiversity net gain commitment will be achieved across the relevant biodiversity unit types. Whilst the Council acknowledges the Applicant's commitment to an overall 10% biodiversity net gain, the requirement should clearly demonstrate how gains will be secured in area-based habitat units, hedgerow units, and watercourse units, where relevant. This would provide clarity regarding the Applicant's intended approach and ensure that biodiversity gains are appropriately evidenced through the statutory biodiversity metric.
- 1.6 The Council also considers that the approved Biodiversity Net Gain Strategy should be secured throughout the operational life of the development and should be substantially in accordance with the

Outline Landscape and Ecological Management Plan. This would provide certainty that the measures relied upon to secure biodiversity net gain are implemented, managed, and maintained in the long term, rather than simply proposed at the application stage.

1.7 The Council therefore recommends that Requirement 11 be amended to include the following provisions:

(1) No part of the authorised development may commence until a biodiversity net gain strategy for that part has been submitted to and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body.

(2) The biodiversity net gain strategy must include details of how the strategy will secure a minimum of 10% biodiversity net gain in area-based habitat units, a minimum of 10% biodiversity net gain in hedgerow units, and a minimum of 10% biodiversity net gain in watercourse units.

(3) The biodiversity net gain strategy must be substantially in accordance with the outline landscape and ecological management plan and must be implemented as approved and maintained throughout the operation of the relevant part of the authorised development to which the plan relates.

1.8 The Council considers that the above amendments would provide a more robust, transparent, and enforceable mechanism for securing the Applicant's biodiversity net gain commitment and would ensure that the relevant planning authority has an appropriate role in reviewing and approving the strategy by which biodiversity net gain will be achieved and maintained.

2. Response to Question 1.3

Validation checklists for discharge of requirement submissions/ requirement 15 of Schedule 3 (Employment and Skills Plan)

The ExA draws the attention of all relevant local authorities to the applicant's response to questions 1c and 2b of [\[REP6-132\]](#).

Question 1c relates to the possible use of development validation checklists for the discharge of requirement submissions.

The applicant previously responded on this matter in [\[REP4-303\]](#), acknowledging such check lists could be helpful, noted it would be appropriate for drafting to be proposed by the host authorities for its consideration. The applicant advises "No drafting has yet been proposed however the applicant will continue discussions on this matter with the host authorities as it progresses ways of working for the discharge of requirements."

All local authorities are asked to signpost where such drafting has been previously provided in examinations submissions or to enter such drafting into the examination.

Question 2b concerned the Employment and Skills Plan (ESP) and whether requirement 15 of schedule 3 of the draft DCO should be worded to require the document submitted pursuant to that requirement to be approved by the relevant discharging authorities. In the light of the applicant's comments on this

matter, as set out in [\[REP6-132\]](#), the ExA seeks the views of all relevant local authorities on this matter, especially in relation to the tests of necessity, relevance to planning, relevance to the development sought, enforceability, precision and reasonableness in all other respects.

- 2.1 The Council is not in a position to propose drafting for a validation checklist at this stage. The Council would therefore welcome the opportunity to review and comment on any wording proposed by the Applicant and other local authorities.
- 2.2 The Council's position on Requirement 15 of Schedule 3 of the draft DCO, relating to the Employment and Skills Plan (ESP), is set out in Appendix C of its Deadline 6 submission [\[REP6-170\]](#).

3. Response to Question 1.4

Outline Code of Construction Practice Appendix E (Community Engagement and Public Information) and Appendix F (Outline Noise and Vibration Management)

The applicant responded to ExQ2 questions DCO 2.S3 and DCO 2.S6 in [\[REP6-115\]](#). Revisions were made to the 'Outline Code of Construction Practise Appendix E - Community Engagement and Public Information' [\[REP6-078\]](#) and the 'Outline Code of Construction Practise Appendix F - Outline Noise and Vibration Management' [\[REP6-080\]](#). The ExA seeks a response from all local authorities who responded to ExQ2 [\[PD-023\]](#) DCO 2.S3 and DCO 2.S6, regarding the adequacy of the revisions submitted, bearing in mind their previous responses to ExQ2 submitted at deadline 5.

- 3.1 Thurrock Council has the revised Outline Code of Construction Practice Appendix E - Community Engagement and Public Information and Appendix F - Outline Noise and Vibration Management.
- 3.2 In relation to Appendix E, the Council considers that the revisions adequately address the concerns previously raised regarding community engagement and the handling of complaints. The Council welcomes the inclusion of a requirement for a more detailed complaints procedure to be developed and submitted to the relevant local authority for review. This will provide an opportunity to ensure that appropriate systems are in place for the receipt, investigation, recording and resolution of complaints during the construction phase.
- 3.3 In relation to Appendix F, the Council notes that the document has been updated to provide additional detail regarding the proposed noise and vibration monitoring procedures and management measures.
- 3.4 Following review of the updated document, the proposed noise monitoring approach is now considered suitable and adequately addresses the concerns previously raised by the Council. It is acknowledged that further detail regarding specific monitoring requirements, methodologies and monitoring locations will be developed through the detailed assessments undertaken for individual works and construction phases.

- 3.5 The Council welcomes the commitment that detailed monitoring proposals will be submitted to the relevant local authority for review and approval, ensuring that appropriate monitoring and mitigation measures can be agreed prior to the commencement of relevant activities.
- 3.6 The approach proposed in relation to Section 61 consents is also considered acceptable. The Section 61 process will provide an additional mechanism for the assessment and control of construction noise and vibration impacts, enabling the relevant local authority to review and comment on proposed working methods, mitigation measures and predicted effects as part of the consent process.
- 3.7 On this basis, Thurrock Council is satisfied that sufficient mechanisms are in place to secure appropriate community engagement, complaints management, and noise and vibration monitoring, assessment and mitigation throughout the construction phase. The Council therefore considers the matters raised previously to be resolved.

4. Response to Question 1.7

Protective Provisions (2)

A number of preferred PPs having been submitted into the examination. If you have not submitted a preferred PP into the examination, the listed interested parties are asked to do so. If you have already submitted your preferred PP into the examination, please signpost the reference where it can be located in the Examination Library.

- 4.1 The Council is currently in discussions with the Applicant to agree a draft Framework Highways Agreement. This is to be submitted by the Applicant.
- 4.2 Thurrock Council is aligned with Norfolk County Council and Essex County Council on flood risk Protective Provisions. The current draft iteration will be submitted by the Applicant.

5. Response to Question 2.7

Compulsory acquisition of operational highway

Notwithstanding your reply to question 1.7 above, please confirm if the applicants submitted PPs, (or other mechanisms secured in the draft DCO) ensure that if compulsory acquisition powers are approved the highway authority will be able to ensure operation of the public highway.

- 5.1 The Council is currently negotiating a draft Framework Highways Agreement which will be submitted by the Applicant. The Council does not anticipate there being any issues with the operation of the public highway.

6. Response to Question 3.1

Assessment of impacts on bat species and proposed mitigation

In paragraphs 6.1.11 to 6.1.14 of the revised version of the outline LEMP [REP6-084], the applicant has included further details of mitigation measures for bat species.

To all local authorities and Natural England:

Comment on whether the amendments made to the revised outline LEMP [REP6-084] now satisfy your concerns in relation to the assessment of impacts on bats and proposed mitigation. This should include whether you think the 10% figure, as proposed in paragraph 6.1.12, would be sufficient. If you have any remaining concerns then please set these out, including what specific actions you consider should be undertaken by the applicant to resolve your concerns.

- 6.1 The Council considers the ratio of 10 trees with PRFs felled to 1 box to lost to be too low. We note that other NSIPs such as Sizewell A46 Newark Bypass and Lower Thames Crossing commit to a much higher. We would expect a ratio closer to 4:1 with this getting closer to 1:1 for PRF-M trees.
- 6.2 The Council would also welcome a commitment to try and ensure compensation features (boxes or veteranisation) will be distributed across the Project (Sections A – H) to reflect the trees lost in each section as closely as possible. This will ensure roost features are maintained near to their commuting and foraging habitats.

7. Response to Question 6.2

Masterplans

A number of IPs have made representations at deadline 6 concerning the Masterplans [REP5-199]. The ExA acknowledge that these plans have been produced in consultation with local authorities, their draft status, and that such plans are illustrative in nature. The ExA also note the applicant's point of view, as made in ISH4 and restated in [REP6-118] that the provisions within the masterplans are not necessary to make the application acceptable in planning terms.

To all local authorities:

Provide your views on the potential mechanism provided by the applicant to provide funding for provision of landscape compensation (as contained in Annex of [REP6-118]).

- 7.1 Thurrock Council has reviewed the Applicant's proposed landscape compensation mechanism. The Council's position on landscape compensation is included in its response to the Examining Authority's (ExA) Issue Specific Hearing Action Points [REP6-170];

"the Council is concerned by the Applicant's position on landscape enhancement and compensation, which was confirmed at ISH 4, that no agreement will be entered into unless it is deemed strictly necessary. The Council considers that landscape compensation measures are required to mitigate the residual landscape and visual effects of the project and to offset the resulting harm experienced by the public."

- 7.2 The Council is aligned with the other host local authorities in the pursuit of a sufficient Section 106 unilateral undertaking to deliver additional landscape planting and enhancement. However, the Council

has not had sufficient time to review the legal or policy requirement for landscape compensation, offsetting and enhancement. On this basis, the Council would defer to Essex County Council for the explanation of the legal necessity for landscape compensation of the proposed Project.

7.3 Additionally, the Applicant has not agreed to a Section 106 agreement and instead has proposed a draft DCO provision; Article 55 Schedule 20 landscape compensation, offsetting, and enhancement in relation to specified locations [REP6-118]. The Council reviewed this Schedule and was mostly satisfied but had some concerns regarding the Location Specific Compensation Opportunities Criteria, the geographic extent of the compensation area, and the size and deliverability of the fund. However, since the publication of this Annex [REP6-118] the Council has engaged in discussions with the Applicant which has resolved some of its previous concerns.

7.4 The Applicant identified land at Tilbury North, within the vicinity of the proposed Tilbury North substation, as a potential location for landscape compensation measures. The landscape in this area has experienced gradual degradation as a result of successive infrastructure and development pressures, including major road networks, electricity transmission infrastructure, residential expansion, mineral extraction, high intensity farming and leisure-related development. Existing landscape features are fragmented, comprising small isolated woodland blocks and remnant boundary hedgerow and scattered areas of regenerating scrubland often associated with previously developed land. In areas where villages have expanded, the urban-rural interface is often weak with little landscape structure to integrate the urban edge with the more rural landscape. Based on this assessment, opportunities for landscape enhancement exist across the wider area, particularly through;

- Restoration of hedgerow networks;
- Strengthening weak settlement edges;
- Enhancement of degraded rural character areas;
- Integration of development with the wider landscape.

7.5 The Council was concerned that any landscape compensation works would be constrained within a 2 km distance from the pylon route. The landscape that has been identified is experiencing substantial cumulative change from existing and planned infrastructure and development including the Lower Thames Crossing DCO and other proposed and recent residential and leisure development. Following discussions, the Applicant has since increased this to a 3 km distance from the pylon route.

7.6 The Applicant's proposed masterplans [REP5-199] would benefit from a written explanation with the proposals. The proposals are very high level, and the Council would require further detail as the plans seem aspirational rather than deliverable. The Council would also require further information regarding the land ownership of the proposals suggested and how consultation with landowners would be carried out.

7.7 The Council was concerned that the proposed £250,000 compensation fund may be insufficient to deliver meaningful landscape enhancement at a scale proportionate to the project's impacts.

7.8 Following discussions with the Applicant including consideration of:

- The potential use of third-sector delivery partners;
- The removal of any expectation that land would need to be purchased;
- Reduced legal and land assembly requirements; and
- Greater flexibility in how projects may be developed and delivered,

Thurrock Council and the Applicant agreed a revised compensation fund of £300,000. A fund of approximately £300,000 should provide sufficient scope to deliver a targeted programme of landscape enhancement focused on priority locations and measures.

7.9 A fund of approximately £300,000 should provide sufficient scope to deliver a targeted programme of landscape enhancement focused on priority locations and measures.

7.10 Included within this figure is £50,000 to facilitate landscape enhancement measures in areas shown in the masterplans. This addresses the omission of opportunities south of the substation.

7.11 A further £50,000 would provide a proportionate allowance for project development, coordination, stakeholder engagement, landowner liaison, feasibility work and project management necessary to bring forward deliverable projects over the lifetime of the project.

7.12 The Council was also concerned that the proposed requirement to spend the fund within ten years, together with the restriction of administration costs to 10% of the fund value, could unnecessarily constraints its ability to develop, secure and deliver effective landscape compensation projects. This has since been increased by the Applicant to 15% of the fund value which the Council considers sufficient.

7.13 Given the modest scale of the proposed fund and the Council's desire to maximise investment in physical landscape enhancement, monitoring and reporting requirements should be proportionate and should not divert significant resources away from delivery.

7.14 The Council emphasised in discussions with the Applicant it would support a light-touch monitoring regime, consisting of a simple annual report. As a result, the Applicant has updated the Article wording to detail a simple annual reporting mechanism the Council is satisfied with.

7.15 The Council would like to reiterate that Thurrock Council is unparished and a unitary authority and is not to be included in the provisions being made in the administrative county of Essex for Place Services to administer funds on behalf of constituent Districts in the County of Essex. Although this matter is being considered elsewhere during the Examination, the Council wishes to reiterate the importance of ensuring that, in light of anticipated local government reorganisation, provisions should be included to ensure any successor authority can assume responsibility for administering the fund.

7.16 As Thurrock Council Officers mentioned at a meeting on Thursday 9 July 2026 the annotation of the map in 8.4.12.2 Response to ISH2 Action Point 27 - Masterplans [REP5-199] should not refer to the site is Chadwell St Mary as "Proposed Chadwell St Mary Housing Allocation". The Assessor should be advised that there is no such allocation in the adopted Development Plan Documents for Thurrock and

the emerging Local Plan has not, to date, formally proceeded further than Regulation 18 Consultation. Regulation 18 considered site options, not proposed allocation, therefore if the site is to remain within the material it needs to be amended to Chadwell St Mary Initial Proposals Site. If matters progress and authority for Regulation 19 Publication is resolved the status of the site would be updated and we can advise accordingly.

8. Response to Question 6.4

Good design

The ExA notes the design review panel (DRP) proposals contained within the DAS [REP6-090] and DASSI [REP6-092] and the provisions for local planning authorities, Dedham Vale National Landscape officials, wildlife trust representatives and North Falls and Five Estuaries project representatives to be invited to meetings where relevant.

To all local authorities and the Wildlife Trusts:

Provide your views on the DRP proposals and any other final comments you wish to make on the subject of good design.

- 8.1 Given the potential issues with delivering BNG over such a large scheme covering a long thin area we welcome the inclusion of a specific BNG lead on the Design Review Panel (DRP).
- 8.2 The Council believes it is key for the local planning authorities to be involved in the DRP and while not needed in this document discussions on the following point would be appreciated.
- Who determines where relevant
 - Ability for LPA to bring along multiple specialists to cover disciplines
 - Anticipated frequency and notice of meetings
- 8.3 The Council acknowledges that the DRP does not have decision making powers and will just provide advice. The Council requests clarification as to whether the reports prepared and the GGP Design Executive, setting out their responses to the DRP's comments, will be made available to stakeholders. If so, the Council further requests confirmation that stakeholders will be given an opportunity to comment on those responses.

Appendix B – Thurrock Council’s Comments on the Applicants Updated Documents

1. Comments on Outline Landscape and Ecological Management Plan (OLEMP) [REP6-084]

1.1 The Council notes that there are no relevant changes within the following sections; Statutory Designated Sites, Non-Statutory Designated Sites that are within Thurrock Council's area and as such have no comment on these sections.

1.2 Roosting Bats

1.2.1 We consider the ratio of 10 trees with PRFs felled to 1 box to lost to be too low. We note that other NSIPs such as Sizewell A46 Newark Bypass and Lower Thames Crossing commit to a much higher ratio. We would expect a ratio closer to 4:1 with this getting closer to 1:1 for PRF-M trees.

1.2.2 We would also welcome a commitment to try and ensure compensation features (boxes or veteranisation) will be distributed across the Project (Sections A – H) to reflect the trees lost in each section as closely as possible. This will ensure roost features are maintained near to their commuting and foraging habitats.

1.2.3 We would also expect that while as set out “*A range of different compensation features (including box types/ veteranised features) should be used in different locations/aspects*” the compensation features should also be selected taking note of the type of features lost and the bat species present in the area to ensure they are suitable for the area.

1.2.4 Regarding reptile mitigation we agree with the inclusion of date range for works being added and the caveat of suitable weather conditions.

1.3 Approach for Ancient Woodland

1.3.1 On point 7.5.10 we would like to see the text from the Ancient Woodland and Veteran Tree Strategy included confirming the compensatory replanting is adjacent to the Rainbow Wood as the connectivity and retaining planting in Thurrock is an important point.

1.4 Approach for Veteran Trees

1.4.1 We accept the inclusion of the “*compensation ratio of 30:1 for any removal of veteran trees*” and that this is in line with current industry standards and the commitment to retain, where possible, the stumps of veteran trees.

1.5 General Approach

1.5.1 The Council welcomes the commitment for ecological advice on decisions regarding replacement features and the commitment for reporting to the Ecology and Landscape Working Group.

1.6 Land Around Tilbury North Substation and Tilbury North (YYJ) CSE Compound – Landscape Proposals

1.6.1 All additional planting around the Tilbury North Substation is welcomed and encouraged.

1.7 Ecology and Landscape Working Group

- 1.7.1 We welcome the group being expanded to include landscape given the interaction between these disciplines. We appreciate the commitment to provide details on ECoW to the group to ensure suitability although would welcome the ability to feedback on the suitability if deemed necessary.

2 Comments on Appendix B – Ancient Woodland and Veteran Tree Strategy [REP6-086]

- 2.1 The only areas of ancient woodland/veteran trees within Thurrock impacted by these works are Rainbow Wood and Ashen Shaw as such our comments will only cover these two areas.
- 2.2 Neither of these areas are due to be affected by the Proposed Works and it is the mitigation areas from the LTC works that will be impacted. We welcome the new mitigation being adjacent to the Rainbow Wood to increase habitat connectivity. The updates to this report regarding Rainbow Wood and Ashen Shaw set out the responsible body for creation of this mitigation area. It is important that this is specified and assuming all parties we have no further comment.

3 Comments on Environmental Statement (ES) Chapter 10 – Health and Wellbeing [REP6-053]

- 3.1 The Council agrees with the applicant's findings that significant residual health effects as a result of air pollution and dust emissions from the construction and use phases of the proposed development are unlikely when they are appropriately mitigated, as per the commitments within Chapter 7 of the ES and the Outline Code of Construction Practice (OCoCP).
- 3.2 The Council notes that proper implementation of the IAQM's guidance documents relating to the assessment and mitigation of dust emissions from demolition and construction should normally render residual impacts as "negligible". Use phase emissions of dust and air pollution are unlikely to be significant given the nature of the development.

4 Comments on updated Outline Code of Construction Practice (OCoCP) [REP6-072]

- 4.1 Having considered National Grid's proposed working arrangements within 7.2 Outline Code of Construction Practice [REP6-073], the Council recommends that construction hours secured through any planning consent are aligned with Thurrock Council's established core construction hours. This would provide consistency with local practice and policy expectations whilst helping to protect nearby residents from unnecessary disturbance.
- 4.2 Where the applicant considers that works outside these core hours are necessary, these should be managed through the Section 61 prior consent process under the Control of Pollution Act 1974. This would enable out-of-hours activities to be justified on a case-by-case basis and require the applicant to demonstrate that Best Practicable Means (BPM) will be employed to minimise noise and disturbance.

The Section 61 process also provides the Council with an appropriate level of oversight and allows any necessary controls, restrictions or mitigation measures to be tailored to the specific works proposed.

4.3 Whilst it is acknowledged that major infrastructure projects may occasionally require extended working hours, managing such exceptions through the Section 61 process represents a more proportionate and effective approach than establishing extended construction hours as the default position.

4.4 **Section 6 – Mitigation Measures, Environmental Commitments and Monitoring, Commitment Reference T13 (To be confirmed by the Main Works Contractor(s) if project is consented, prior to construction) Table 6.1 details the following additional commitment:** *‘The Applicant will review the availability and suitability of the North Falls/Five Estuaries haul road for use by the Project during construction. The review will consider whether the haul road is operational, available at the required time, capable of accommodating the proposed construction traffic and can be utilised without adversely affecting the delivery of either project. Where the review identifies that use of the haul road is reasonably practicable and feasible, the Applicant will incorporate its use within the final Construction Traffic Management Plan’.*

Through a review of the OCTMP Rev E, it is noted that the Applicant has undertaken consultation with North Falls and Five Estuaries and has committed to do so with respect to the use of a temporary construction haul road located adjacent to the proposed East Anglia Connection Node (EACN) Substation, between Bentley Road and Ardleigh Road to provide temporary construction access to the sub-station site.

Summary and Changes to Thurrock Council’s Statement of Common Ground Position

4.4.1 Thurrock Council welcome the additional commitment and recommend that the Main Work Contractor(s) investigate opportunity to use shared temporary haul roads to minimise the impact of the proposed development. On review, this addition to the OCoCP Revision F results in no changes to Thurrock Council’s position within the SoCG. Therefore, SoCG Environmental Impact Assessment (EIA) - Embedded, Standard and Additional Mitigation Measures, Item 3.10.19 Embedded Mitigation remains ‘Under Discussion’.

5 Comments on OCoCP Appendix E – Community Engagement and Public Information [REP6-078] and Appendix F - Outline Noise and Vibration Management [REP6-080]

5.1 In relation to Appendix E, the Council considers that the revisions adequately address the concerns previously raised regarding community engagement and the handling of complaints. The Council welcomes the inclusion of a requirement for a more detailed complaints procedure to be developed and submitted to the relevant local authority for review. This will provide an opportunity to ensure that

appropriate systems are in place for the receipt, investigation, recording and resolution of complaints during the construction phase.

- 5.2 The Council would only suggest that the wording related to the EMF helpline be strengthened to include the information that was shared by National Grid in an email dated 10/06/2026, and in particular the sentence highlighted in bold at the end of the second paragraph. Namely:

“The EMF Helpline number is an answer phone service, where callers leave their details and a member of the team will call the enquirer back to discuss the issue between 9am and 5 pm weekdays. The SLA is 3 working days currently, although most calls are responded to on the same day (excluding weekends). However, calls, emails and letters can be received 24 hours a day, 7 days a week. The same time frames for response would apply to emails and letters.

*The purpose of the helpline is to answer any concerns that members of the public may have regarding EMFs. The service is run by EMF Specialists within National Grid, who can provide details of EMF exposures at specific properties, and have knowledge of the science and policies regarding EMF. As the helpline has been in operation for over a decade, the team have a great deal of experience dealing with questions and concerns about a range of EMF topics. **Where particular concerns arise, for residents close to National Grid assets, we can offer home visits and perform on site measurements.**”*

- 5.3 In relation to Appendix F, the Council notes that the document has been updated to provide additional detail regarding the proposed noise and vibration monitoring procedures and management measures.
- 5.4 Following review of the updated document, the proposed noise monitoring approach is now considered suitable and adequately addresses the concerns previously raised by the Council. It is acknowledged that further detail regarding specific monitoring requirements, methodologies and monitoring locations will be developed through the detailed assessments undertaken for individual works and construction phases.
- 5.5 The Council welcomes the commitment that detailed monitoring proposals will be submitted to the relevant local authority for review and approval, ensuring that appropriate monitoring and mitigation measures can be agreed prior to the commencement of relevant activities.
- 5.6 The approach proposed in relation to Section 61 consents is also considered acceptable. The Section 61 process will provide an additional mechanism for the assessment and control of construction noise and vibration impacts, enabling the relevant local authority to review and comment on proposed working methods, mitigation measures and predicted effects as part of the consent process.
- 5.7 On this basis, Thurrock Council is satisfied that sufficient mechanisms are in place to secure appropriate community engagement, complaints management, and noise and vibration monitoring, assessment and mitigation throughout the construction phase.

6 Comments on Outline Construction Traffic Management Plan (OCTMP) [REP6-082]

6.1 Section 2.3 – Working Hours, para 2.3.5 – two instances where a Primary Access Route (PAR) ‘goes directly past a school (Freeman Primary School (Stow Upland) and Margaretting Church of England Primary School (Margaretting). At these locations, Heavy Goods Vehicles (HGV) will travel outside of the weekday school dropoff/ pick up times’.

6.1.1 Summary and Changes to Thurrock Council’s Statement of Common Ground Position

Thurrock Council note the Applicant’s recognition of the location of the two schools on the local road network which will be subject to construction traffic. Thurrock Council fully expected the Applicant to ensure that the location of these two schools to be included within the final CTMP the Drivers Welcome Pack to ensure that the construction vehicles will adhere to the agreed travel times (outside of weekday school drop off/ pick up times).

6.2 Section 3.3 – Community Engagement and Public Information, para 3.3.3 – ‘The name and contact details for the Project will be displayed at the entrance to each site compound. This will include an emergency telephone number. Details of the works, including contact details, will be provided to the relevant community groups, such as local parish councils, local highway authorities, and landowners before work commences. In the instance this number may be updated throughout construction, the contact details at each site entrance will be updated and circulated to the local parish councils, local highway authorities and landowners.’

Section 3.3 – Community Engagement and Public Information, para 3.3.4 – ‘A freephone Project helpline and Project website will be maintained by the National Grid community relations team. The Project helpline and website information will be visible on boards placed in appropriate locations where they will be visible to the public. The telephone number and Project website details will be provided to the relevant local authorities and other relevant parties. This will be updated in the instance of contact details changing throughout the project construction’.

Summary and Changes to Thurrock Council’s Statement of Common Ground Position

6.2.1 Thurrock Council welcome the additional commitment to maintain communications through the life of the construction programme and update stakeholder and public information as appropriate.

6.2.2 Thurrock Council’s position, SoCG Outline Construction Traffic Management Plan (CTMP) – Item 3.10.33 Project Team Roles and Responsibilities remains ‘Agreed’ subject to the commitments as understood by Thurrock Council as detailed in the two bullet points shown in Thurrock Council’s Position within the SoCG, Item 3.10.33.

6.3 Section 5.4 – Construction Traffic – General Construction Routeing Strategy, Multi Modal Routing, para 5.4.12 – noted additional commentary: ‘The Main Works Contractor(s) will pursue the exploration and implementation (where feasible, commercially viable and operationally reasonable) of alternative transport modes to deliver materials and large and/or heavy items. The contractor will review and discuss

ways of reducing freight by road with each Local Highway Authority, with a coordinated approach where feasible and practicable. This will include (but not restricted to):

- *Consolidation centres*
- *Wider considerations of the Multi-Modal Strategy using rail and port facilities to replace long distance road freight*
- *Review of “just in time” scenario (Scenario 2), set out in Appendix G of the Transport Assessment*

Summary and Changes to Thurrock Council’s Statement of Common Ground Position

6.3.1 Thurrock Council welcome the commitment of the Main Works Contractor(s) to explore options of alternative transport modes to deliver materials and large and/or heavy items and would expect this to be included within the final CTMP. Additionally, where relevant, the Applicant/ Mains Works Contractor(s) to advise Thurrock Council and/or any relevant stakeholders as appropriate.

6.3.2 Thurrock Council’s position, SoCG Outline Construction Traffic Management Plan (CTMP) – Item 3.10.8 Primary Access Routes remains ‘Under Discussion’ subject to the review of information requested and provided by the Applicant on 10 and 13 July 2026. This matter is subject to Thurrock Council’s review of and satisfaction with the requested information. Thurrock Council is committed to continue discussions with the Applicant, which will likely conclude after the finalisation of this statement of common ground.

6.3.3 Thurrock Council’s position, SoCG Abnormal Indivisible Load (AIL) Access – Item 3.10.49 Abnormal Indivisible Load (AIL) Access Approach remains ‘Agreed’.

6.4 **Section 5.9 – Highway Mitigation Measures – para 5.9.9** - Section 6 of the Transport Assessment (Document Number 7.11) outlines the approach to assessing the impact of background traffic growth plus committed development plus Project construction flows during the AM and PM peak. As a result of this assessment a number of junctions have been identified for requiring further mitigation during the construction period – these are listed in Table 5.10. The Main Works Contractor(s) will be responsible for ensuring these measures are enforced. Table 5.10 also includes junctions on the highway network where temporary or permanent mitigation has not been identified due to the anticipated limited impact of the Project construction traffic.

Section 5.9 Highway Mitigation Measures, para 5.9.10 – For these junctions, the Main Works Contractor(s) will develop a monitoring and mitigation framework which will include the proposed details of monitoring of the junctions and additional temporary and proportionate mitigation measures that be implemented during construction, where (trigger points) are met or are predicted to be met, including re-timing vehicles away from peak hours, shared mobility (transport), additional traffic management and signage, and signal optimisation. This framework will be agreed with the relevant Local Highway Authority or National Highways in relation to SRN junctions and will be included within the final CTMP. To support the framework, additional proportionate measures may be discussed with the relevant Local Highway Authority, to explore suitable mitigation.

Summary and Changes to Thurrock Council's Statement of Common Ground Position

6.4.1 The Applicant issued information requested by Thurrock Council on 10 and 13 July 2026. Thurrock Council is currently reviewing this information. This matter is subject to Thurrock Council's review of and satisfaction with the requested information. Thurrock Council is committed to continue discussions with the Applicant, which will likely conclude after the finalisation of this statement of common ground.

6.5 **Section 6 Implementation, Table 6.1** – Site Checks Relevant to the CTMP – Note amendment to the following:

- **Inspection Type:** Monitoring of Vehicles and Road Network/ **Purpose:** Checking signage is in place. Monitoring of vehicle condition and use of agreed construction routes. Monitoring of construction *HGV* ~~vehicles~~ movements

Summary and Changes to Thurrock Council's Statement of Common Ground Position

6.5.1 Thurrock Council's position, SoCG Item 3.10.47 – Primary Access Route on Muckingford Road – The Applicant is to ensure that only LGV construction traffic uses Muckingford Road. It is fully expected that the Applicant ensures that the use of Muckingford Road is monitored through the life of the CTMP, and where noncompliance is recorded, appropriate enforcement actions, mitigation and sanctions are applied. These instances will be recorded within the CTMP and conveyed to Thurrock Council as appropriate.

6.5.2 Thurrock Council's position, SoCG Item 3.10.47 is 'agreed' on the principle that use of Muckingford Road by construction vehicles (staff or deliveries) is monitored. On this basis, Thurrock Council consider the removal of 'vehicles' and replacement with 'HGV' to be inappropriate.