

AENC-NG-CNS-REP-0089

Norwich to Tilbury

Volume 5: Reports and Statements

Document: 5.9.20 Signed Statement of Common Ground -
National Highways - Tracked Changes Version

Final Issue D

July 2026

Planning Inspectorate Reference: EN020027

Infrastructure Planning (Applications: Prescribed Forms and Procedure)
Regulations 2009 Regulation 5(2)(g)

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Revision History

Version	Date	Submitted at
A	29 August 2025	DCO Application
B	26 February 2026	Deadline 1
C	12 May 2026	Deadline 4
<u>D</u>	<u>21 July 2026</u>	Deadline 7

National Highways

Draft Statement of Common Ground

1. Purpose of the Statement of Common Ground

This Statement of Common Ground (SoCG) has been prepared to ~~outline the areas of~~confirm to the Examining Authority where agreement ~~and any remaining points of discussion has been reached and where agreement has not been reached~~ between National Grid and National Highways regarding transport impacts in relation to the proposed Norwich to Tilbury Project.

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

This final signed version of the SoCG has been submitted at Examination Deadline 7.

2. Parties to the SoCG

This SoCG ~~is agreed between~~has been prepared by National Grid and National Highways.

3. Summary of Matters Under Discussion

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

SoCG ID	Summary of matter under discussion	Deadline for resolution
6.1.2— Study area	National Highways is reviewing additional information- provided by the Applicant with regards to the modelling of- the A12 Junction 25.	Deadline 4
6.1.3— Data- sources	National Highways is reviewing additional information- provided by the Applicant.	Deadline 4
6.1.4— Assessment methodology	Discussions ongoing for the need of micro-simulation—— modeling on the A12Q/Long Green/B11108/Cress ig Road- Junct on, the A12Q/A131/B1256 Roundabout and- B1Q18/Millenium Way.	Deadline 4
<u>6.1.2 - Study area</u> <u>6.1.4-</u>	Request for further information regarding the methodology, — <u>National</u> assumptions used, trip generation and assignment <u>Grid will provide, by Deadline 7, modelling inputs and</u> likely to be <u>unlikely to be</u>	Deadline 4 <u>4</u> <u>After is</u>

SoCG ID	Summary of matter under discussion	Deadline for resolution
Assessment methodology 6.1.5 -Key parameters and assumptions	supporting calculations for National Highways' review. Discussions are likely to be concluded during the detailed design stage, with a resolution expected by early November 2026 or sooner.	agreed during Examination.
6.1.6—Baseline-conditions-and-receptors	A review of collision data over a five-year period (excluding COVID-19) was undertaken by the Applicant. The Applicant expects to submit an addendum to the TA at Deadline 4 which present the findings of the updated-collision analysis.	Deadline 4
6.1.7 - Embedded mitigation	National Grid will provide, by Deadline 7, modelling inputs and supporting calculations for National Highways raised concern that all potential impacts of the Project on the Strategic Road Network may have not been assessed' review. Discussions are likely to be concluded during the detailed design stage, with a resolution expected by early November 2026 or sooner.	Deadline 4 After is unlikely to be agreed during Examination.
6.1.8 - Standard mitigation	National Highways is reviewing the traffic modelling results provided by the Applicant. Discussions ongoing are likely to be concluded during the detailed design stage, with a resolution expected by early November 2026 or sooner.	Deadline 4 After is unlikely to be agreed during Examination.
6.1.9 -Additional mitigation	National Highways is reviewing the traffic modelling results provided by the Applicant. Discussions ongoing National Highways will review the RSA1 Brief when it is provided and will review the final Audit report when complete. Discussions are likely to be concluded during the detailed design stage, with a resolution expected by early November 2026 or sooner.	Deadline 4 After is unlikely to be agreed during Examination.
6.1.10- Construction effects	National Highways is reviewing the traffic modelling undertaken by the Applicant. Discussions ongoing are likely to be concluded during the detailed design stage, with a resolution expected by early November 2026 or sooner.	Deadline 4 After is unlikely to be agreed during Examination.
6.1.11 - Outline CoCP	The modelling and mitigation need to be agreed by National Highways before it can endorse the Outline CoCP. Discussions are likely to be concluded during the detailed design stage, with a resolution expected by early November 2026 or sooner.	Deadline 4 After is unlikely to be agreed during Examination.
6.1.13 - Study	National Highways has raised additional junctions to	Deadline-

SoCG ID	Summary of matter under discussion	Deadline for resolution
area	undergo assessment. The Applicant expanded the assessment scope and identified A12 Junction 25 as the only additional junction to require modelling. The trip generation, trip distribution and trip assignment across the whole network needs to be agreed by National Highways. <u>National Grid will provide, by Deadline 7, the following information for National Highways¹ review: (i) supporting calculations underpinning the trip generation, trip distribution and trip assignment assumptions; and (ii) justification supporting the exclusion of M11 Junction 8, M25 J28 and M25 J29 from the study area. Discussions are likely to be concluded during the detailed design stage, with a resolution expected by early November 2026 or sooner.</u>	<u>4Matter is unlikely to be agreed during Examination.</u>
6.1.15 - Junction capacity	National Highways has raised additional junctions to undergo assessment. The Applicant expanded the assessment scope and identified A12 Junction 25 as the only additional junction to require modelling. <u>For further details, refer to item 6.1.13 above.</u>	Deadline-4 <u>Matter is unlikely to be agreed during Examination.</u>
6.1.16 - Junction modelling	Outstanding queries in respect of Galley's Corner, the Asda Roundabout, A14 J55, A12 J26, and M25 J30. The trip generation, trip distribution and trip assignment across the whole network needs to be agreed by National Highways. <u>For further details, refer to item 6.1.13 above.</u>	Deadline-7 <u>Matter is unlikely to be agreed during Examination.</u>
6.1.17 - Assessment of WCH	The Applicant will issue WCHARs and GGIQI Risk Assessments for A120/Bentley Road and A12 on slip at the A12 Ipswich Road/B1070 Junction for National Highway to review National Highways is reviewing the information that National Grid has provided for the assessment of Walkers, Cyclist and Horse Riders (WCH). Discussions are likely to be concluded during the detailed design stage, with a resolution expected by early November 2026 or sooner.	Deadline-4 <u>Matter is unlikely to be agreed during Examination.</u>
6r4r4-9— Road-safety	A review of collision data over a five-year period (excluding COVID-19) was undertaken by the Applicant. The Applicant expects to submit an addendum to the TA at Deadline 4 which present the findings of the updated collision analysis.	Deadline-A
6.1.20 - Mitigation measures	The trip generation, trip distribution and trip assignment across the whole network needs to be agreed for National Highways to understand the impacts on the Strategic Road	Deadline-4 <u>Matter is unlikely to be</u>

SoCG ID	Summary of matter under discussion	Deadline for resolution
	Network and mitigation measures that are required. For further details, refer to item 6.1.13 above.	agreed during Examination.
6.1.21—Baseline-conditions	National Highways has stated that this matter is subject to the provision of the final version of the R.R.ngr TA.	Deadline 7
6.1.24 -Key assumptions	National Highways is reviewing will review the additional information provided regarding trip generation, methodology, assumptions and assignment by the Applicant to be provided by National Grid. For further details, refer to item 6.1.13 above.	Deadline-4 After is unlikely to be agreed during Examination.
6.1.25-Methodology	National Highways is reviewing the additional information provided regarding trip generation, methodology, assumptions and assignment by the Applicant See item 6.1.13 above.	Deadline-4 Matter is unlikely to be agreed during Examination.
6.1.26-Construction vehicle trips	National Highways is reviewing the additional information provided regarding trip generation and assignment See item 6.1.13 above.	Deadline-4 After is unlikely to be agreed during Examination.
6.1.28 - Overall impact of the Project	National Highways has stated that the conclusions in the TA cannot be agreed until all TA-related issues in this SOCG are addressed. See item 6.1.13 above.	Deadline-7 After is unlikely to be agreed during Examination.
6.1.32 - Implementation / Enforcement	Discussion on corrective measures for persistent enforcement breaches. National Highways wishes to agree the controls included within the CTMP. National Highways considers that further measures are required, which it will describe in its Deadline 7 response. Discussions are likely to be concluded during the detailed design stage, with a resolution expected by early November 2026 or sooner.	Deadline-7 Matter is unlikely to be agreed during Examination.
6.1.36-Monitoring and review	Request for National Highways to be consulted during review of monitoring results, for areas that impact the Strategic Road Network. National Highways wishes to agree the controls included within the CTMP. National Highways considers that further measures are required, which it will describe in its Deadline 7 response. Discussions are likely to be concluded during the detailed design stage, with a resolution expected by early November 2026 or sooner.	Deadline-7 After is unlikely to be agreed during Examination.

SoCG ID	Summary of matter under discussion	Deadline for resolution
6.1.39- Construction access from National Highways infrastructure	Ongoing discussions relating to TB-B059 site access bellmouth (agreement subject to completion and review of RSA1 and GG104 Risk Assessment). <u>National Grid has submitted a GG104 Risk Assessment for the proposed site access bellmouth TB-B059, which National Highways is reviewing. Discussions are likely to be concluded during the detailed design stage, with a resolution expected by early November 2026 or sooner.</u>	Deadline-4 <u>Matter is unlikely to be agreed during Examination.</u>
6.1.40 - Proposed mitigations impacting National Highways infrastructure	Discussions related to three identified sites is subject to completion and review of RSA1 and GG10d Risk Assessment <u>National Highways is reviewing GG104 assessments provided by National Grid in July 2026. National Highways has not ruled out mitigation being required at other locations until junction modelling assessments are complete. Discussions are likely to be concluded during the detailed design stage, with a resolution expected by early November 2026 or sooner.</u>	Deadline-7 <u>Matter is unlikely to be agreed during Examination.</u>
6.1.40a - Highway mitigation - Copdock Roundabout	A By Deadline 7 or shortly thereafter, National Grid will submit a Stage 1 Road Safety Audit is being undertaken brief for National Highways' review <u>for the lane alterations proposed at the A14 J55 Copdock Interchange, This will be overseen by National Highways. National Grid expects the audit and designer's response to be completed by the end of August 2026. Discussions are likely to be concluded during the detailed design stage, with a resolution expected by early November 2026 or sooner.</u>	Deadline-7 <u>Matter is unlikely to be agreed during Examination.</u>
6.1.42 - TROs and TROs <u>TROs</u>	Further discussions and information requested by National Highways with regards to the proposed traffic regulation orders of the Project. <u>Discussions on this matter are linked to the ongoing negotiation of Protective Provisions for National Highways. Both parties aim to reach agreement by the end of Examination or shortly thereafter.</u>	Deadline-7 <u>Matter is unlikely to be agreed during Examination.</u>
6.1.47 - Protective provisions	The Applicant and National Highways are continuing discussions to agree a set of Protective Provisions that addresses all of National Highways' concerns. <u>Both parties aim to reach agreement by the end of Examination or shortly thereafter.</u>	Deadline-7 <u>Matter is unlikely to be agreed during Examination.</u>
6.1.48 - Compulsory Acquisition of land and property	National Highways objects to the compulsory acquisition of operational land. The Applicant and National Highways have agreed to undertake a detailed assessment of all National Highways land interests, and the rights sought by	Deadline-7 <u>Matter is unlikely to be agreed during</u>

SoCG ID	Summary of matter under discussion	Deadline for resolution
	the Applicant. Discussions on this matter are linked to the ongoing negotiation of Protective Provisions and a Side Agreement. Both parties aim to reach agreement by the end of Examination or shortly thereafter.	Examination.
6.1.49 - Overhead lines	Preparation of Section 169 Agreements and Approvals in Principle between the Applicant and National Highways for proposed overhead line crossings along the Strategic Road Network. Discussions between National Grid and National Highways' Third Party Works Team are ongoing. Discussions are likely to be concluded during the detailed design stage.	Deadline 7 After is unlikely to be agreed during Examination.
6.1.50- Underground crossings	National Highways has shared requirements - the Applicant will continue to liaise with National Highways to obtain an Approval in Principle. This is for the underground cabling crossing proposed on the A12. Discussions between National Grid and National Highways' Third Party Works Team are ongoing. Discussions are likely to be concluded during the detailed design stage.	Deadline- 7 After is unlikely to be agreed during Examination.

4. Background

4.1 Description of the Project/Development

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

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

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

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

The reinforcement is needed because the existing transmission network, even with current upgrading, will not have sufficient capacity for the new renewable energy (a substantial proportion of which would be generated by offshore wind) that is expected to connect to the

network over the next 10 years and beyond. Completion of the Project, together with other new reinforcements across the country, will meet this future energy transmission demand both in East Anglia and across the UK.

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

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

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

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

5. Stakeholder Interests

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

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

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

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

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

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

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- o Development of proposed Traffic Regulation Orders and Temporary Traffic Regulation Orders;
 - o Initial development of items to be included within the Statement of Common Ground.
- 2026
 - January 2026 - National Grid held a meeting with National Highways to discuss junction modelling specific concerns, geometry and traffic inputs/data, the junction modelling selection process and junctions excluded from the assessment.
 - March 2026 - National Grid held a meeting with National Highways to discuss the trip generation and junction modelling.
 - ~~Further engagement on a number of Traffic and Transport matters to be reflected in the Statement of Common Ground.~~ June 2026 - National Grid held a meeting with National Highways to discuss the trip generation, trip distribution and trip assignment.

6. Matters Agreed, Not Agreed or Under Discussion

ID	Matter	National Grid's Position	National Highways' Position	Status
EIA- Regulatory, Planning Policy Context and Guidance				
6.1.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Traffic and Transport assessment is presented in 6.15 Environmental Statement Chapter 2 -Key Legislation and Planning Policy Context [APP126], and Chapter 16 -Traffic and Transport [APP-271]. All relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment.	National Highways agree that the relevant policy and legislation in respect of the SRN have been appropriately considered.	Agreed
EIA - Approach and Methods				
6.1.2	Study Area	The Applicant presented an early draft of the Transport Assessment (7.11 Transport Assessment [APP-333]) to the LHAs and National Highways at the Thematic Group Meeting in January 2025 and again ran through the methodology of junction sifting process, junction assessment methodology and cumulative assessment. The selection methodology and list of junctions deemed sensitive through the sifting process was provided for review by LHA and National Highways	National Highways considers that additional junctions may be adversely impacted and may need to be assessed. <u>The trip distribution/assignment for the construction traffic is yet to be fully understood and agreed, and therefore so is the modelling. As a consequence, there may be required mitigations that are not yet known. In productive discussions with the</u>	Under Discussion

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ID	Matter	National Grid's Position	National Highways' Position	Status
		at the thematic group meeting held in April 2024, and feedback was used to refine the final selection. As a result of this engagement, several additional junctions were incorporated into the assessment scope, e.g. M25 J30 which does not connect to a Primary Access Route. A meeting was held with National Highways on 13th January 2026 to discuss junction modelling specific concerns, geometry and traffic inputs/data, the junction modelling selection process and six additional junctions that National Highways indicated, in its relevant representation, may also require traffic modelling. National Grid set out in the meeting its justification for why it does not consider necessary to model these junctions, except for the A12 J25, given the cancellation of the A12 Chelmsford to A120 Widening Scheme in Essex. National Highways is discussing with National Grid the type of modelling to apply to this junction. Following the meeting, National Grid has provided National Highways with further information for its review. A meeting was held to discuss the trip generation and junction modelling with National Highways on 31st March. Following the meeting, National Grid has provided National Highways with further information for its review.	<u>Applicant, National Highways has explained that it is broadly content with the logic behind the methodology which the Applicant has employed to determine the construction trip generation, distribution and assignment, but it has not yet had visibility of the detailed calculations that were made and therefore it is still not possible for NH to agree with the forecast traffic flows at SRN junctions, nor whether the proposed mitigation is appropriate.</u> Further information provided by the Applicant is currently being reviewed.<u>The Applicant has agreed to share the detailed shapefiles and spreadsheet calculations to enable an understanding of how the forecast traffic volumes have been derived and these are expected shortly. NH will review these as quickly as possible once they have been received.</u>	

ID	Matter	National Grid's Position	National Highways' Position	Status
6.1.3	Datasources	Sufficient desktop and survey data has been collected to inform the assessment as presented within 6.16 Environmental Statement Chapter 16 -Traffic and Transport [APP-271] , National Grid has submitted the survey data to National Highways for review.	National Highways is currently-reviewing <u>content that</u> the survey data is <u>valid</u> .	Under-Discussion Agreed
6.1.4	Assessment methodology	The methodology for assessing Traffic and Transport was outlined through the 6.19 Scoping Report [APP-288, APP-290, APP-291, APP-292, APP-293, APP-294, APP-295, APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate. This includes junction selection and the type of software packaging used to model the junctions. The Applicant has attended meetings with National Highways to discuss the modelling methodology <u>used within 7.11 Transport Assessment IAPP-333</u> . This has been accepted except for <u>all junctions. National Grid has agreed with National Highways that VISSIM modelling is to be undertaken</u> for Site 48: A120/Long Green/B11018/Cressing Road junction (Galley's <u>Galleys</u> Corner) and the A120/A131/B1256 (Marks Farm) Roundabout and B1018/Millennium Way, where the Applicant and National Highways are currently in discussion on the need for micro-simulation modelling to be	<u>In productive discussions with the Applicant, National Highways has explained that it is broadly content with the logic behind the methodology which the Applicant has employed to determine the construction trip generation, distribution and assignment, but it has not yet had visibility of the detailed calculations that were made and therefore it is still not possible for NH to agree with the forecast traffic flows at SRN junctions, nor whether the proposed mitigation is appropriate.</u> <u>The Applicant has agreed to share the detailed shapefiles and spreadsheet calculations to enable an understanding of how the forecast traffic volumes have been derived and these are expected shortly. NH will review these as quickly as possible once they have been received.</u>	Under Discussion

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ID	Matter	National Grid's Position	National Highways' Position	Status
		undertaken. The Applicant will continue to engage with National Highways.. <u>National Grid anticipates that the VISSIM modelling will be completed by the end of August 2026</u>	National Highways requires further information regarding the trip generation, distribution and assignment, and continues to believe that VISSIM modelling is required at Galleys Corner/Marks Farm on the A120.- <u>National Highways will engage further with the Applicant on these matters.National Highways and the Applicant have agreed an approach to model the A120 Galley's Corner junction and its environs using VISSIM. The shapefiles are to be provided by the Applicant for this location to enable the turning movements to be understood and used as inputs into VISSIM. Once received, understood and agreed, the process to complete the modelling is expected to take approximately five weeks.</u>	
6.1.5	Key parameters and assumptions	Key parameters and assumptions associated with the Traffic and Transport assessment are summarised in 6.16 Environmental Statement Chapter 16 -Traffic and Transport [APP-271] , The key parameters and assumptions presented are considered appropriate and inclusive of comments made by National Highways during the Thematic	National Highways has requested further information and clarification regarding the methodology and details of all assumptions used, including trip generation and assignment. <u>The Applicant will provide shapefiles which should enable NH to understand</u>	<u>Under Discussion</u>

ID	Matter	National Grid's Position	National Highways' Position	Status
		Group Meetings. A meeting was held with National Highways to discuss the trip generation and assignment. The trip generation methodology is covered in the Trip Generation - Key Assumptions item below.	how the forecast flows have been calculated.	
EIA - Baseline Conditions				
6.1.6	Baseline conditions and receptors	The baseline conditions and receptors for Traffic and Transport are presented in 6.16 Environmental Statement Chapter 16 -Traffic and Transport [APP-271]. The baseline conditions and receptors presented are considered appropriate. A review of collision data over a five year period excluding COVID-19 period has been undertaken. An addendum to 7.11 Transport Assessment [APP-333] is to be submitted during examination at Deadline 45, which will present presents the findings of the updated collision analysis. In addition, the addendum will include includes a summary of all baseline data used within all { additional modelling undertaken at SRN junctions and the findings of further assessment. The Applicant will continue to engage with National Highways.	National Highways position is subject to review of the traffic survey data and updated collision data to cover a 5-year period excluding COVID-19 period. <u>is content that the baseline conditions presented are appropriate.</u> National Highways also requires further justification for some junctions having been excluded from the assessment. National Highways welcomes the submission of additional information into the examination and will continue review this information as it becomes available,	Under-Discussion Agreed
EIA - Embedded, Standard and Additional Mitigation Measures				
6.1.7	Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Traffic and	National Highways is not yet satisfied that all the potential impacts of the	Under Discussion

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ID	Matter	National Grid's Position	National Highways' Position	Status
		Transport effects, are set out in 6.16 Environmental Statement Chapter 16 -Traffic and Transport [APP-271], 7.3 Outline Construction Management Plan [APP-309] includes all relevant construction related mitigation measures and traffic routing. Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. National Grid would welcome a breakdown of matters connected with impacts assessment which National Highways would require to reach mutual agreement following review of information/data submitted for review. <u>National Grid continues to engage with National Highways regarding the assessment of impacts on the SRN. The scope of assessment has been expanded where appropriate, including modelling of the A12 junction 25 and VISSIM modelling of the A12Q Galleys Corner.</u> <u>This work is intended to further inform the understanding of network performance and any potential requirements for mitigation.</u> <u>The Applicant considers that the current programme of assessment (expected to be completed by the end of August 2026), including the provision of additional data and ongoing engagement, will address National Highways' outstanding queries.</u>	project on the SRN have been assessed and therefore cannot be certain that additional mitigation is not yet required. National Highways also has further questions of the Applicant regarding the assessment of proposed mitigation. <u>Once the Shapefiles have been provided by the Applicant, and have been reviewed, NH will be able to confirm its position.</u> <u>The completion of modelling at A12Q Galley's Corner and at the A12 J25 will also enable NH to understand whether additional mitigation is required.</u>	
6.1.8	Standard mitigation	Standard mitigation measures to reduce potential	National Highways position is reserved	Under

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ID	Matter	National Grid's Position	National Highways' Position	Status
		Traffic and Transport effects during construction are summarised in 6.16 Environmental Statement Chapter 16 -Traffic and Transport [APP-271] and set out in 7.2 Outline Code of Construction Practice [APP-300] . The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	until the results of the traffic modelling are understood and agreed.	Discussion
6.1.9	Additional mitigation	The consideration of additional mitigation measures is presented in 6.16 Environmental Statement Chapter 16 -Traffic and Transport [APP-271], Table 5.10 in 7.3 Outline Construction Traffic Management Plan [Revision E] lists junctions where National Grid is proposing additional mitigation. National Grid has commissioned a Stage 1 Road Safety Audit of the proposed additional mitigation at the A14 junction 55 Copdock Interchange and expects the audit and designer's response to be completed by the end of August 2026. Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. National Grid will continue to engage with National Highways on this matter during detailed design to agree the additional mitigation. National Grid expects that all additional mitigation can be agreed by early November 2026.	National Highways position is reserved until the results of the traffic modelling are understood and agreed. National Highways will review the RSA1 Brief when it is provided and will review the final Audit report when complete.	Under Discussion

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ID	Matter	National Grid's Position	National Highways' Position	Status
EIA - Assessment Conclusions				
6.1.10	Construction effects	The assessment of effects during construction is presented in 6.16 Environmental Statement Chapter 16 -Traffic and Transport [APP-271] . The assessment of effects during construction presented is considered appropriate.	National Highways is reviewing the traffic modelling undertaken by the Applicant in detail and discussions are ongoing,	Under Discussion
Draft DCO / Outline Management Plans / Mitigation and Monitoring				
6.1.11	Outline CoCP	The Outline CoCP includes all relevant construction related mitigation measures specified in 6.16 Environmental Statement Chapter 16 -Traffic and Transport [APP-271] and is appropriate for managing construction impacts from the Project. National Grid will continue to engage with National Highways on this matter.	The modelling and mitigation need to be agreed before National Highways can endorse the outline CoCP.	Under Discussion
Transport Assessment (TA) - Regulatory, Planning Policy Context and Guidance				
6.1.12	Policy and Legislation	The policy context, legislation and guidance considered when undertaking the Traffic and Transport assessment is presented in 7.11 Transport Assessment Chapter 3 - Key Planning Policy Context [APP-333] . All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	National Highways is content that all relevant policy, legislation and guidance has been considered.	Agreed
Transport Assessment - Approach and Methods				
6.1.13	Study Area	The study area comprises all roads along the PARs, wider road network (SRN/MRN) that might	National Highways considers that some additional junctions may need to be	Under Discussion

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		experience changes in traffic patterns resulting from the Project, PRow and WCH routes that interact with the haul roads within the Order Limits and the PARs as presented within 7.11 Transport Assessment Chapter 2 - Project Description [APP-333]. The Study Area is considered appropriate for the assessment. National Grid presented an early draft of the Transport Assessment (7.11 Transport Assessment [APP-333]) to the LHAs and National Highways at the Thematic Group Meeting in January 2025 and again ran through the methodology of junction sifting process, junction assessment methodology and cumulative assessment. The selection methodology and list of junctions deemed sensitive through the sifting process was provided for review by LHA and National Highways at the thematic group meeting held in April 2024, and feedback was used to refine the final selection. As a result of this engagement, several additional junctions were incorporated into the assessment scope, e.g. M25 J30 which does not connect to a Primary Access Route. National Grid set out in the meeting of 13th January 2026 its justification for why it does not consider necessary to model any additional junctions, except for the A12 J25, given the cancellation of the A12 Chelmsford to A120 Widening Scheme in Essex.	included in the study area and assessed for the construction impact of the project. National Highways needs to agree the trip generation, trip distribution and trip assignment across the network as a whole before the study area can be agreed. <u>The Shapefiles to be provided by the Applicant will assist in enabling NH to determine the impacts at each of the SRN junctions.</u> <u>Information to support the exclusion of M11 J8, M25 J28 and M25 J29 from the Study Area will also be reviewed.</u>	

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		A meeting was held to discuss the trip generation and junction modelling with National Highways on 31st March. Following the meeting, National Grid has provided National Highways with further information on the trip generation, distribution and assignment including traffic flow diagrams for its review. National Grid will provide National Highways with additional information on construction traffic assignment and total/net increase in traffic at SRN junctions within the Study Area. National highways have also requested construction traffic flow details for junctions outside of the transport Study Area, namely: M11 Junction 8, M25 Junction 28, and M25 Junction 29. This information will be submitted to National Highways by Deadline 7 and is expected to address National Highways' outstanding queries.		
6.1.14	Multi-Modal Strategy	A Multi-Modal Assessment was undertaken (detailed within 7.11 Transport Assessment - Appendix G - Multi-Modal Transport Report [APP-340]) and developed to identify and assess opportunities which could make use of alternative transport modes to supply materials for the construction of the Project. The 7.11 Transport Assessment [APP-340-333] details the sensitivity test which was undertaken from the potential Ports and Rail Sidings, based on maximum throughput of the alternative options, to	Following the provision of additional evidence, National Highways has assessed the information and is content to agree the Multi-Modal Assessment.	Agreed

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		understand if any additional junctions along the scheme needed to be mitigated. The delivery profile of materials onto Primary Access Routes did not change. The Multi-Modal Assessment provided an indicative potential option for transporting aggregates from local ports and railheads. National Grid and their appointed Main Works Contractor (MWC) are currently re-assessing the multi-modal options available within the project, including existing available capacities at each of the ports and sidings. This will be incorporated into the updated construction vehicle volumes, which the MWC is developing. The worst case impact on the road network is not anticipated to change, as the assessment was completed on the maximum throughput per day from each port. The vehicle volumes would be expected to remain consistent or reduce through the updated investigation.		
6.1.15	Junction Capacity Assessment Methodology	National Grid presented an early draft of the Transport Assessment (7.11 Transport Assessment [APP-333]) to the LHAs and National Highways at the Thematic Group Meeting in January 2025 and again ran through the methodology of junction sifting process, junction assessment methodology and cumulative assessment. The selection methodology and list of junctions	National Highways considers that additional junctions may need to be assessed <u>and will review the information to be provided by the Applicant as soon as it is received.</u>	Under Discussion

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		deemed sensitive through the sifting process was provided for review by LHA and National Highways at the thematic group meeting held in April 2024, and feedback was used to refine the final selection. As a result of this engagement, several additional junctions were incorporated into the assessment scope, e.g. M25 J30 which does not connect to a Primary Access Route. National Grid set out in the meeting of 13th January 2026 its justification for why it does not consider necessary to model any additional junctions, except for the A12 J25, given the cancellation of the A12 Chelmsford to A120 Widening Scheme in Essex. A meeting was held to discuss the trip generation and junction modelling with National Highways on 31st March. Following the meeting, National Grid has provided National Highways with further information for its review. <u>National Highways has requested construction traffic flow details for junctions outside of the transport Study Area, namely: M11 Junction 8, M25 Junction 28, and M25 Junction 29 to understand the likely impact on their operation. This information will be submitted to National Highways by Deadline 7 and is expected to address National Highways' outstanding queries.</u>		

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6.1.16	Junction Modelling	The methodology used for undertaking junction assessments is presented in 7.11 Transport Assessment Chapter 6 - Methodology [APP-333]. The assessment methodology used is considered appropriate. <u>A meeting was held to discuss the trip generation and junction modelling with National Highways on 31st March. Following the meeting, National Grid has provided National Highways with further information on the trip generation, distribution and assignment including traffic flow diagrams for its review.</u> <u>National Grid has agreed with National Highways that it will undertake microsimulation modelling of the A12 junction 25. National Grid expects that the modelling will be completed by early August 2026.</u> <u>National Grid and National Highways have agreed that National Highways will make its traffic model available to undertake VISSIM modelling of Galleys Corner, Mark's Farm and the B1Q18/Millennium Way roundabouts. National Grid agrees to provide modelling inputs to National Highways' consultants, who will undertake the modelling. National Grid expects that the modelling will be completed by the end of August 2026.</u> <u>As set out in ID 6.1.13, National Grid will provide by Deadline 7 additional information to National Highways for review on the trip generation, trip</u>	National Highways has reviewed the construction of the models and outstanding queries remain in respect of Galley's Corner and Mark's Farm roundabouts. National Highways needs to agree the trip generation, trip distribution and trip assignment across the network before the development trips used in the model can be agreed. <u>Microsimulation modelling of A12Q Galley's Corner is to be undertaken once the inputs have been supplied and agreed. Modelling of A12 J25 is also being undertaken by the Applicant</u> <u>National Highways will review the results of these exercises when they are complete.</u>	Under Discussion

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		<u>distribution and trip assignment and total/net increase in traffic at SRN junctions within the Study Area.</u> National Grid will continue to engage with National Highways <u>on and expects to resolve</u> this matter <u>by the end of August 2026.</u>		
6.1.17	Assessment of Walkers, <u>CyclistCyclists</u> and Horse Riders (WCH)	A WCHAR <u>report</u> has been prepared and will be- submitted to National Highways for the following locations where changes to the Strategic Road Network are proposed: • A120/ Bentley Road <u>junction</u> * A12 on slip at the A12 Ipswich Road/B1070 junction. National Grid will issue the WCHARs to National Highways and will continue to liaise with National Highways to address any comments on these. <u>National Grid has submitted a WCHAR Exemption Note for the A12Q Colchester Road proposed site access point and will submit by the end of August, 2026 a WCHAR Exemption Note for the A14 junction 55 Copdock Interchange. National Grid will continue to liaise with National Highways to address any comments on these.</u> GG104 risk assessments are being prepared by- <u>National Grid and these will have been</u> submitted	National Highways understands the assessment of the Walkers, Cyclist and Horse Riders Network has been made on the basis of IEMA Guidelines, which is an accepted approach. National Highways requires a WCHAR report and GG104 Risk Assessment for any locations on the SRN where a change to the layout of the highway is proposed for a duration of at least six months. National Highways understands these documents are currently being prepared and will review them once they have been made available <u>was provided this information by the Applicant on 10 July 2026 and these are under review.</u>	Under Discussion

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		to National Highways for review and acceptance.		
6.1.18	Impact on Parking	The methodology for the assessment of impact to on-street parking is presented within 7.11 Transport Assessment Chapter 6 - Methodology [APP-333] . This includes a case-by-case assessment of temporary suspensions of formal and informal kerbside parking by the Project along PARs and Abnormal Load routes. This methodology is considered appropriate.	National Highways is content with the Applicant's approach.	Agreed
6.1.19	Road Safety	Within the Transport Assessment (7.11 Transport Assessment [APP-333]), collision analysis was undertaken for all junctions where the Strategic Road Network (SRN) connects to the Primary Access Routes. A review of collision data over a five-year period excluding <u>the COVID-19 period (60-month period between March 2020 and September 2021)</u> has been undertaken. An addendum to 7.11 and is presented within 7.11.1 Transport Assessment [APP-333] is to be Addendum [REP-5165] submitted during examination at Deadline 4 which will presents. <u>This presents</u> the findings of the updated collision analysis. In addition, the addendum will include <u>includes</u> a summary of all baseline data used within all additional <u>updated</u> modelling undertaken at SRN junctions and the	National Highways has requested a more in-depth review of collision clusters at SRN junctions. The collision assessment study area cannot be agreed until the full impacts on the SRN are understood. Any junctions expected to experience more than 30 development trips in a peak hour should be included. The collision analysis should cover a five year (60 month) excluding data gathered between March 2020 and September 2021. National Highways welcomes the submission of <u>has reviewed the</u> additional information on this matter, will review the information when it becomes available and provide an updated position provided <u>and is content with the analysis</u>.	Under-Discussion Agreed

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		finding of fact for a decision. The Applicant will continue to engage with National Highways.	<u>undertaken by the Applicant.</u>	
Transport Assessment - Mitigation Measures				
6.1.20	Mitigation Measures	Mitigation measures include embedded, standard and additional mitigation identified within 7.11 Transport Assessment Chapter 2 - Project Description [APP-333], and as reported within 16.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271], 7.2 Outline Code of Construction Practice [APP-300] and 7.3 Outline Construction Management Plan [APP-309]. This includes additional mitigation at junctions and specific areas to help reduce the impact on capacity and provide environmental mitigation measures to reduce the significance of effects of the Project. The measures presented are considered appropriate. National Grid will continue to engage with National Highways on this matter during a detailed desicm to <u>agree the mitigation measures, with agreement anticipated by early November 2026.</u>	National Highways position is subject to the completion of the modelling assessment to understand the impacts of the development on the SRN during construction and mitigation measures that are required.	Under Discussion
Transport Assessment - Baseline Conditions				
6.1.21	Baseline Conditions	The baseline conditions and sensitive receptors for Traffic and Transport are presented in 7.11 Transport Assessment Chapter 4 - Existing Baseline Transport Conditions [APP-333]. and	National Highways position is subject to review of the final versions of the ES and <u>TA has reviewed the additional information provided by the Applicant.</u>	Under-Discussion Agreed

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		are considered appropriate. <u>7.11.1 Transport Assessment Addendum rREP-5165</u> , submitted during examination at Deadline 5, presents updated collision data and junction modelling data. National Grid will continue to pnn Acip with NntionAl HighwAVQ on thi mattpr.	<u>and is satisfied that the baseline conditions are appropriate.</u>	
Transport Assessment - Future Baseline Conditions				
6.1.22	Growth Factors	The future baseline traffic on the SRN / MRN has been estimated applying appropriate growth factors derived from TEMPro NTEM dataset v7.2 and are presented in 7.11 Transport Assessment Chapter 5 - Future Baseline [APP-333] , Growth factors have been applied for the peak year of activity and therefore vary along PARs. This approach and the growth rate used is considered appropriate.	National Highways agrees that the approach is appropriate and considers the use of TEMPro NTEM dataset v7.2 as acceptable for forecasting future growth in the assessment years.	Agreed
6.1.23	Cumulative Developments	National Grid has engaged with the Local Highway Authorities and National Highways throughout the Development Consent Order process. As part of this engagement, National Grid requested a review of those committed developments initially identified for assessment and requested details of any additional developments that may impact the Project. The developments identified by National Highways were not provided to National Grid as needing to be reviewed as part of the cumulative assessment and are located a notable distance from the PARs.	National Highways notes that no traffic flow information was available for Tendring/ Colchester Borders Garden Community at the cut-off stage. This is considered to be a reasonable justification for the exclusion of TCBGC from the list of committed developments. National Highways considers that the traffic associated with Bathside Bay will have been included within the background <u>the background</u> traffic	Agreed

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

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		assessment. The construction of the Norfolk Vanguard project started in 2023 and is expected to be completed by 2028 prior to the Project's peak construction. For the Boreas Wind Farms Project, the indicative Construction Programme indicates construction would end by 2027. These developments would therefore be excluded from the Project's cumulative assessment as daily movements, where overlapping, would not be significant.		
Transport Assessment - Construction Trip Generation				
6.1.24	Key Assumptions	Key assumptions associated with the Traffic and Transport assessment are summarised in 16.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and Section 6.2 of Chapter 6 of the 7.11 Transport Assessment [APP-333]. The key assumptions presented are considered appropriate. A meeting was held with National Highways on 31st March 2026 where the trip generation methodology, assumptions and assignment was presented and discussed. National Highways is reviewing the information provided. <u>See response to ID 6.1.13 on additional information to be provided to National Highways.</u>	National Highways has received additional information, and this is currently being reviewed. National Highways will aim to provide an update at Deadline 5 <u>review the additional information as soon as this is provided,</u>	Under Discussion

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6.1.25	Methodology	A meeting was held with National Highways on 31 st March 2026 where the trip generation methodology, assumptions and assignment was presented and discussed. See response to ID 6.1.13 on additional information to be provided to National Highways- ape- reviewing the information provided.	National Highways has received additional information, and this is currently being reviewed. National Highways will aim to provide an update- at Deadline 5 review the information as soon as it is provided.	Under Discussion
6.1.26	Construction Vehicle Trips	Trip generation estimation has been undertaken to evaluate the daily traffic levels associated with construction activities for both the OHL and cables and substations. The estimation is based on a worst-case scenario, identifying peak-day vehicle movements for each construction activity to ensure a robust and conservative impact. This is presented in 7.11 Transport Assessment Chapter 6 - Methodology [APP-333] , The trip generation is considered appropriate. A meeting was held on 31 st March 2026 with National Highways to discuss the trip generation and assignment. Following the meeting, National Grid has provided National Highways with further information for its review.	National Highways has received additional information, and this is currently being reviewed. National Highways will aim to provide an update- at Deadline 5 review the further information as soon as it is provided.	Under Discussion
6.1.27	Construction Workforce Trips	The target occupancy rate of 1.3 was taken as best practice for the minimum target and is based on the Bramford to Twinstead Development Consent Order Construction Traffic Management Plan [EN020002] . Section 6.4 of the Transport Assessment (7.11	National Grid has provided clarification on the vehicle occupancy rate of 1.3 which National Highways has reviewed and considered acceptable.	Agreed

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

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

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	Enforcement	Management Plan [APP-309]. This process is appropriate and adequate for the Project. A number of matters have been defined as non-compliance to ensure that the CTMP is effectively enforced within Section 6.4 of 7.3 Outline Construction Traffic Management Plan [APP-309]. All incidents associated with the construction of the Project, including non-conformance with the CTMP, will be reported by the Environmental Clerk of Works and Transport Coordinators. Where a breach or complaint is reported, the Main Works Contractor(s) and/or National Grid will carry out an investigation in order to identify appropriate corrective actions. Where needed, corrective actions will be agreed with the relevant LHA or National Highways, and/or community members prior to implementation. Where a corrective action is identified, the LHA or National Highways will be informed. Data recorded from the non-compliance procedure will be collated on a quarterly basis and will be issued out to the relevant parties, including LHAs and National Highways. <u>The Main Works Contractor(s) will include, within the final CTMP, potential sanctions for persistent enforcement breaches. The Outline Construction Traffic Management Plan [Revision E] includes the potential sanctions/enforcement procedure to be considered by the Main Works Contractor(s).</u> The Main Works Contractor(s) will be responsible for	enforcement reasons identified for non-compliance of the CTMP to be comprehensive. However, it is unknown- what measures would be taken for- persistent enforcement breaches.- National Highways wishes to agree the- controls that are included within the- CTMP.- <u>Further details have been provided in an update to the oCTMP at Deadline 6. These are welcomed by National Highways but further measures are considered to be required, which will be described in NH's Deadline 7 response.</u>	Discussion

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		developing the Detailed CTMP and its control measures, which will be done in agreement with National Highways as detailed in Sections 1.7 and 6.8 of 7.3 Outline Construction Traffic Management Plan [APP-309] ,		
Outline Construction Worker Travel Plan (OCWTP)				
6.1.33	Policy	The policy context, including legislation and guidance considered in the development of the document is set out in 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311] . All relevant legislation, policy, and guidance have been identified and appropriately considered to inform the OCWTP .	National Highways agrees with National Grid's position set out within the Outline Construction Worker Travel Plan section 4.	Agreed
6.1.34	Site Accessibility Review	The Site Accessibility review is captured within 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311] . This review is appropriate for the Project.	National Highways agrees with National Grid's position regarding site accessibility.	Agreed
6.1.35	Targets, Strategy, and Measures	Targets, Strategy and Measures are set out within 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311] . The construction targets set out are relevant and achievable, given the present stage of Project development. The strategy and measures proposed to be	National Highways is content that the explanation provided for the vehicle occupancy rationratio of 1.3 is acceptable.	Agreed

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		implemented are suitable and appropriate for managing the anticipated construction staff travel impacts arising from the Project. National Grid will continue to engage with National Highways regarding the required information.- See ID 6.1.27 for discussion on 1.3 person per vehicle target.		
6.1.36	Monitoring and Review	A number of matters have been defined as non-compliance to ensure that the CWTP is effectively enforced within Section 8 of 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]. The TPC will be responsible for undertaking site inspections to check compliance with the CTMP. All incidents associated with the construction of the project, including environmental incidents and non-conformance with the CWTP, will be reported and investigated. Where the Main Works Contractor(s), suppliers or sub-contractors are not delivering the requirements, National Grid will review performance and conduct further training and issue formal warnings as appropriate. The Main Works Contractor will be responsible for developing the Detailed CWTP and its control measures, which will be developed through	The monitoring and review processes set out in Section 9 are considered acceptable for the proposed development. National Highways requests to be consulted when reviewing monitoring results, for areas that impact the SRN, such as the EACN. National Highways wishes to agree the controls that are included within the CWTP. <u>Further details have been provided in an update to the oCTMP at Deadline 6. These are welcomed by National Highways but further measures are considered to be required, which will be described in NH's Deadline 7 response. This is especially important as the modelling, development impact on SRN junctions and proposed mitigation</u>	Under Discussion

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		consultation with the relevant LHA and National Highways. Any future changes will follow the change process set out in Section 8.4 of 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311] . See ID 6.1.27 for discussion on 1.3 person per vehicle target.	requirements are not agreed.	
Construction Access Strategy and Design				
6.1.37	Construction Access Approach	The approach for construction access for the Project is proposed to utilise designated routes for construction traffic on local roads. These are defined as 'Primary Access Routes' (PARs) within 7.3 Outline Construction Traffic Management Plan [APP-309] . This approach is suitable for construction traffic for the Project.	National Highways consider the approach taken for selecting Primary Access Routes to be acceptable.	Accepted
6.1.38	Primary Access Route Selection	Routes on local roads proposed to be utilised as Primary Access Routes (PARs) are shown in the 7.3 Outline Construction Management Plan - Appendix C - Indicative Highway Mitigation Plans [APP-312, APP-313, APP-314, APP-315, APP-316, APP-317, APP-318, APP-319] . These have been discussed with National Highways during regular engagement meetings since September 2023. These PARs and their proposed interactions with the Strategic Road Network (SRN)	National Highways consider the approach taken for selecting Primary Access Routes to be acceptable.	Accepted

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		are suitable for use by the proposed construction traffic, considering the proposed mitigation measures detailed within the 7.3 Outline Construction Traffic Management Plan [APP-309] .		
6.1.39	Construction Access from National Highways Infrastructure	The proposed site access locations ('Access Bellmouths') and locations where construction traffic is proposed to cross the Public Highway ('Crossover Bellmouths') are set out in 7.3 Outline Construction Traffic Management Plan [APP-309]. Construction access is proposed to be taken directly from the Strategic Road Network in one location, from the A120 between Coggeshall and Marks Tey. This location is denoted as 'TB-B059' in the Project documentation. The requirement for the construction access in this location has been discussed with National Highways, and is considered suitable in principle, in line with Department for Transport (DfT) Circular 01/2022. A technical note setting out this rationale was shared with National Highways in September 2024 and accepted in principle in October 2024. The design of the proposed access in this location has been prepared based on the Design Manual for Roads and Bridges CD123, and Stage 1 Road	The principle of the access Bellmouth from the A120 between Coggeshall and Marks Tey is acceptable subject to completion of GG104 Risk Assessment. This was provided to NH on 10 Julv 2026 and is currently being reviewed.	Under Discussion

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		Safety Audits (RSAs) have been undertaken for this proposed location, overseen by National Highways. The RSA report and designer's response have been issued to National Highways for review and acceptance. AJ3G104 risk assessments are being <u>assessment for the access bellmouth from the A120 has been</u> prepared by National Grid and these will be- submitted to National Highways for review and acceptance.		
6.1.40	Proposed Mitigations Impacting National Highways Infrastructure	Mitigation measures proposed on the Public Highway are described in 7.3 Outline Construction Traffic Management Plan [APP-309], and are further set out in the following Schedules [APP-056]: Schedule 6, Part 1 - Streets Subject to Permanent Alteration of Layout. Schedule 6, Part 2 - Streets Subject to Temporary Alteration of Layout. Of these, two locations have been identified impacting the Strategic Road Network: Permanent modification of the A12(N)/B1070 merge slip, near Holton St Mary in Suffolk. Permanent modification of the A120(E)/Bentley Road merge slip near Little Bentley, Essex. Preliminary designs at these locations have been developed to DMRB standards. Stage 1 Road	The principle of the proposed mitigation at three locations on the SRN (including Copdock) is acceptable subject to completion of the Road Safety Audit stage 1 process and GG104 Risk Assessment. Preliminary Design drawings for both locations have yet to be provided therefore National Highways will need to complete a compliance check with DMRB standards. <u>The RSA1s have been signed off by NH for all locations except Copdock Roundabout. The Brief for this RSA will be reviewed when it received.</u> <u>GG1Q4 assessments were provided by the Applicant on 10 July 2026 and are currently being reviewed.</u>	Under Discussion

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		Safety Audits of these designs have been undertaken for each location, and this process including review of the designs and RSA briefs has been overseen by National Highways. The RSA report and designers<u>designer's</u> response has been issued to National Highways for review and acceptance. GG104 risk assessments are being<u>have been</u> prepared by National Grid and these will be- submitted to National Highways for review and acceptance.	National Highways cannot yet be certain that mitigation at other locations is not required until the junction modelling assessments are complete.	
6.1.40a	Highway mitigation - Copdock Roundabout	As a result of the junction modelling, additional mitigation has been identified at the Copdock Roundabout. The preliminary design of this mitigation is being prepared by the Main Works Contractor. A Stage 1 Road Safety Audit will be undertaken on this and overseen by National Highways. <u>National Grid expects the audit and designer's response to be completed by the end of August 2026.</u>	National Highways requires a RSA1 and GG 104 assessment to be undertaken for the proposed the lane marking alterations at the A14 J55 Copdock Interchange. <u>NH will review the RSA1 brief when it is provided by the Applicant.</u>	Under Discussion
6.1.41	Traffic Management	Traffic Management measures proposed on the Public Highway are described in 7.3 Outline Construction Traffic Management Plan [APP-309] and further set out in Schedule 5 - Streets Subject to Streetworks of the Draft Development Consent Order [APP-056J]. These are suitable and sufficient	National Highways is content to agree the traffic management proposals in the oCTMP in principle, subject to further discussion and agreement on the detailed proposals before the CTMP is finalised.	Agreed

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		for the delivery of the Project. Approaches to Traffic Management were discussed in principle during engagement sessions in June 2024, and further specific measures relating to highway mitigation design were discussed during engagement sessions in April 2025. National Grid will continue to engage with National Highways as the proposed Traffic Management measures are developed further, including through the Road Safety Audit process where these relate to proposed site access design (ID 6.1.42), and highway mitigation design (ID 6.1.43), Corrective actions to address any non-compliances will be agreed with National Highways where these relate to the SRN.		
6.1.42	Traffic Regulation Orders and Temporary Traffic Regulation Orders	Proposed Traffic Regulation Orders (TROs) and Temporary Traffic Regulation Orders (TTROs) are shown in the Traffic Regulation Order Plan (document reference 2.4) [APP-025 to APP-032 inclusive], and set out in Schedule 13 of the draft DCO (document reference 3.1) [APP-056]: • Part 1: Temporary restriction of waiting and restriction of speed • Part 2: Temporary restriction of access and restriction of movement	National Highways' Protective Provisions would provide sufficient safeguarding in this regard. The Protective Provisions are under discussion with the Applicant and its legal team.	Under Discussion

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		• Part 3: Temporary no overtaking order • Part 4: Permanent restriction of waiting and restriction of speed. The TROs proposed are necessary to enable the safe construction of the Project, and safe operation at permanent road features. The activities where TROs are required on the SRN include: • Highway mitigation works • Site access points • Netting activities to enable overhead line stringing • AIL routing constraint sites. The works programme is yet to be finalised, so the durations of all TROs are unable to be confirmed at this time. The proposed TROs listed in Schedule 13 of 3.1 Draft Development Consent Order [APP-056] are intended to be worst-case scenarios, and the Main Works Contractor may elect to reduce the number, type or extent of them. National Grid will continue to engage with National Highways on this matter.		
Abnormal Indivisible Load (AIL) Access				
6.1.43	Abnormal Indivisible	The approach for Abnormal Indivisible Load (AIL)	National Highways considers this to be	Agreed

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	Load (AIL) Access Approach	access to the project is to utilise designated routes on the local and Strategic Road networks. This approach is set out within 7.3 Outline Construction Traffic Management Plan [APP-309] and further detailed within the 7.3 Outline Construction Traffic Management Plan - Appendix A - AIL Access Strategy [APP-310]. A draft version of the AIL Access Strategy was shared with National Highways in March 2025. This approach, in principle, is suitable for AIL access for the Project at the current stage of project development.	agreed.	
6.1.44	Abnormal Indivisible Load (AIL) Access Routes	Routes proposed to be utilised by Abnormal Indivisible Loads (AILs) are shown in 7.3 Outline Construction Traffic Management Plan - Appendix A - AIL Access Strategy [APP-310]. These have been developed following consultations with National Highways. As part of these consultations, draft route information was shared in July 2024 and April 2025. These routes are considered to be feasible, and reasonable for the current stage of project development.	National Highways considers this to be agreed.	Agreed
6.1.45	Abnormal Indivisible	Routes proposed to be utilised by Abnormal	National Highways considers this to be	Agreed

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	Load (AIL) Structural Investigations	Indivisible Loads (AILs) are shown in 7.3 Outline Construction Traffic Management Plan - Appendix A - AIL Access Strategy [APP-310]. National Grid have been consulting with National Highways in relation to structures on the sections of the Local Road Network impacted by these proposed routes. As part of these consultations, draft route information was shared in July 2024 and April 2025, and information around impacted structures requested. Specific concerns raised by National Highways in relation to structures on the draft routes shared have been considered in the development of the proposals shown in 7.3 Outline Construction Traffic Management Plan - Appendix A - AIL Access Strategy [APP-310]. 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 supersede requirements for formal application ahead of any AIL movements undertaken by the Project. The relevant process is set out in 7.3 Outline Construction Traffic Management Plan - Appendix A - AIL Access Strategy [APP-310]. The AIL application submitted prior to vehicle movements made by the Main Works Contractor will	agreed.	

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		address structures affected, street furniture and any third-party land impacts as well as programming and operational arrangement to accommodate the movements with minimal impact on the network.		
6.1.46	Abnormal Indivisible Load (AIL) Mitigation and Management Measures	The locations of proposed mitigation measures associated with proposed AIL Routes are shown in the Construction Access Plans within 7.3 Construction Traffic Management Plan - Appendix C - Indicative Highway Mitigation Plans [APP-312 to APP-320 inclusive]. These mitigation measures have been developed consistently with the wider Highway Mitigation approach for the Project (ID 6.1.43) and are suitable and sufficient for the delivery of the Project. Management measures relevant to AIL movements are discussed within Section 5.3 of the CTMP, and Section 6 of the AIL Access Strategy (Appendix A of the CTMP). This approach, in principle, is suitable for AIL access for the Project at the current stage of project development.	No mitigation measures are currently required on the SRN for AILs however, Structural Assessments may be required when the applicant submits the ESDAL application. In some locations, mitigation measures may be required to ensure the route is suitable for the intended loads.	Agreed
6.1.47	Protective provisions	Whilst National Highways' proposed Protective Provisions provided at Appendix 1 of its Relevant Representations are not agreed at this stage, National Grid will continue to liaise with National Highways to seek to fully agree a set of Protective Provisions that addresses all of National Highways'	National Highways does not consider that the proposed protective provisions included within the draft DCO provide adequate protection in respect of the safe operation of the SRN. National Highways has provided its standard form	Under Discussion

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		concerns.	of protective provisions and continues to discuss these with the Applicant.	
6.1.48	Compulsory Acquisition of land and property	The Applicant held a meeting with National Highways in February 2026 regarding this matter. The Applicant and National Highways have mutually agreed to meet again since <u>held several meetings</u> to undertake a detailed assessment of all of National Highways land interests, and the rights sought by the Applicant. The Applicant is confident that the outstanding discussions will be taken forward to find a mutually agreeable approach regarding legal agreements to protect National Highways and its ability to ensure safe and efficient operation of the SRN will be agreed and implemented. <u>The Applicant agrees that subject to reaching agreement with National Highways on terms of Protective Provisions and a Side Agreement that it should not be necessary to acquire Class 1 land rights in relation to land within the extent of adopted highway within the SRN.</u>	National Highways objects to the compulsory acquisition of operational land to ensure that the safe and efficient operation of the SRN can be maintained by NH. Some of the plots pertain to operational Highway and compulsory acquisition of such land is unacceptable and would prevent NH from discharging its statutory duties. National Highways has reviewed all plots contained within the Book of Reference and is in discussion with Applicant about alternative approaches of enabling access to National Highways owned land to enable construction of the project. <u>NH's view is that the Applicant will be able to access the land it needs within the extent of adopted highway within the SRN without the need for the Applicant to acquire Class 1 land rights. A satisfactory approach has been agreed in principle. However, the terms of the Protective Provisions and Side Agreement are still to be finalised and agreed.</u>	Under Discussion

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6.1.49	Overhead Lines	The route of the Electricity Transmission cable is proposed to cross the NH Strategic Road Network (SRN) in four locations: • A14 - between Greeting St Peter and Greeting St Mary • A12 - North of J29 • A120 - between Coggeshall and Marks Tey • A12 - South of J14 National Grid notes National Highways' requirements and will engage <u>is engaging</u> with National Highways as part of the <u>'Third Party Works Team for the</u> preparation of Section 169 Agreements and Approvals in Principle for the proposed overhead line crossings of the SRN = <u>National Grid will continue to work closely with National Highways during detailed design to secure the necessary approvals.</u>	A Section 169 Agreement with an Approval in Principle by National Highways is required for the sections of overhead lines crossing over the top of the SRN. <u>Discussions with NH's Third Party Works Team are ongoing.</u>	Under Discussion
6.1.50	Underground crossings	The Applicant notes National Highways' requirements set out in its Relevant Representation and will continue to liaise <u>Statement of Common Ground and is engaging</u> with National Highways' <u>Third Party Works Team</u>, as part of the preparation of an Approval in Principle, in relation to the technical detail of the underground crossing of the <u>A12 (Strategic Road Network).</u> <u>National Grid will continue to work closely with</u>	For the section of underground cabling crossing the A12 an Approval in Principle by National Highways is required. • NH only permits Trenchless Crossing techniques on the SRN, with Horizontal Directional Drilling the preferred method. • NH are unable to determine the	Under Discussion

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		<u>National Highways during detailed design to secure the necessary approvals.</u>	geotechnical risks on the A12. Any proposed directional drilling under the SRN will require compliance with The Design Manual for Roads and Bridges (DMRB) Chapter CD622 (Managing Geotechnical Risk). - NH advises the Applicant to review the requirements of CD622, which can be found on the Standards for Highways website. Consideration should also be given to the potential impact of drilling upon other SRN assets, such as drainage, with evidence provided for NH's review. Additional asset impact may require further approval processes. NH's standard protective provisions (as appended in Appendix 1) secure these approvals and requirements. - All cable works will require monitoring and assurance, with safety risks assessed for monitoring, and survey works within the proximity of the A12 live carriageway. ♦-Discussions with NH's Third Party Works Team are ongoing.	

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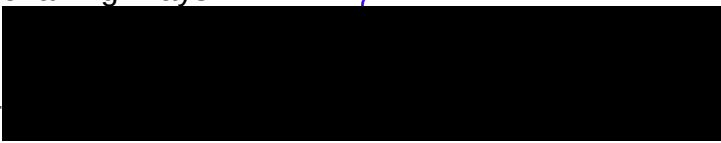
7. Signatures

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

For National Grid DocuSigned by:
Name 

Position: Project Director

Date: 17/07/2026

For National Highways Signed by:
Name 

Position' Interim DCO Lead, Operations East

Date: J] 2026

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Delete-	128
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Move To	0
Table Insert	1
Table Delete	6
Table moves to	0
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Embedded Excel	0
Format changes	0
Total Changes:	329