

Thurrock Council's Closing Statement in respect of the Norwich to Tilbury Project Development Consent Order (the "Order")

1 Introduction

- 1.1 This document is Thurrock Council's (or "the Council") Closing Statement to the Examining Authority ("ExA") for the Development Consent Order ("DCO") application submitted by National Grid Electricity Transmission Plc ("NG" or "the Applicant") for the Norwich to Tilbury project ("the Project").
- 1.2 This Closing Statement is an update to the Council's Relevant Representation [RR-3665] which was submitted to the Planning Inspectorate ("PINS") in the acceptance stage of the DCO process. Thurrock Council has engaged with the Applicant consistently throughout the pre-application and examination process with the aim of resolving all issues that are not agreed.
- 1.3 Taking progress made during the examination period into account, the document sets out the Council's overall position on the Project and identifies the outstanding issues the Council wishes to be addressed in the ExA's report to the Secretary of State ("SoS").

2 Thurrock Council's Position

- 2.1 Thurrock Council's summary position was stated in its Relevant Representation [RR-3665]:
- "Thurrock Council opposes development consent being granted for this DCO application, unless the technical issues raised in the following relevant representation are resolved (further detail is set out below). Whilst Thurrock Council recognises the need for the Project and considers several areas of the DCO application to be acceptable, the Project (as proposed) raises some major concerns. In some instances, these concerns may be resolved through the provision of further supporting information from NG."*
- 2.2 Some progress has been made to address or resolve some of the issues raised by Thurrock Council in its Relevant Representation [RR-3665] and in its Local Impact Report ("LIR") [REP1-187] and Thurrock Council does not oppose the Project in principle. However, the Council maintains its objection to the Project on the basis that some of the technical issues raised in its Relevant Representation have not been resolved.
- 2.3 Thurrock Council encourages the Applicant to continue to engage with the Council in the post-Examination period, including in the period before any decision is made on the DCO application by the SoS.

3 Outstanding Matters that were raised in the Council's Relevant Representation [RR-3665]

- 3.1 Compulsory Purchase: Linford Household Waste and Recycling Centre

- 3.1.1 Linford Household Waste and Recycling Centre ("HWRC") was identified as a site where the Applicant seeks to acquire permanent rights for access. As Linford HWRC is the only operating recycling centre in the borough, the Council is concerned that the proposed compulsory acquisition could result in significant negative impacts on the HWRC and hinder its operation.
- 3.1.2 The HWRC is a well-used facility within the borough. Any disruption to access, internal movements, site boundaries or operational areas could have a significant impact on site functionality, safety and customer experience.
- 3.1.3 During the examination process, the Applicant clarified that land at the HWRC would be acquired to facilitate scaffolding and catch nets associated with the installation of overhead wires enabling Buckingham Hill Road to remain open during the works. The Applicant also advised that the plans submitted reflect the full Limits of Deviation.
- 3.1.4 Following a site visit with the Applicant and its lands team on 15 April 2026 and discussions during examination, the Applicant stated that initial assessment work indicated the final scaffolding arrangement is likely to be more limited but could not confirm specific details.
- 3.1.5 The Applicant has not provided sufficient certainty regarding the final location and extent of the scaffolding, access routes and associated works. The Council therefore requires further information on:
- Whether any temporary or permanent works, including scaffolding, access routes, or related activities, would be located within the HWRC boundary or perimeter;
 - The potential impacts on vehicular access, including the resident entrance and internal movement; and
 - Any effects on existing site infrastructure, such as site boundaries, containers and operational areas.

The Applicant confirmed these details would be provided at the detailed design stage post-examination.

- 3.1.6 Without specific details regarding the location, positioning and extent of scaffolding and the access routes, the Council cannot have certainty at this time that the operations of Linford HWRC will not be materially affected by this compulsory acquisition. Until updated plans and sufficient detail are provided to demonstrate that HWRC operations will not be materially affected, the Council considers this technical issue has not been sufficiently resolved and thus maintains its objection to the Project as stated in the Council's Relevant Representation.

3.2 Core working hours

- 3.2.1 Requirement 7(1) of Schedule 3 of the draft DCO [REP7-064] sets out the core construction working hours proposed by the Applicant. These are 07:00 to 19:00 on Monday to Friday and 07:00 to 17:00 on Saturdays, Sundays, bank holidays and other public holidays unless otherwise approved by the relevant planning authority. These core working hours exclude the

additional start-up and close-down activities up to 1 hour either side of these hours (Requirement 7(5)).

- 3.2.2 The proposed core working hours extend significantly beyond the Council's standard core working hours, which are 08:00 to 18:00 on Monday to Friday, 08:00 to 13:00 on Saturdays, and no works on Sundays, bank holidays and other public holidays.
- 3.2.3 The Council maintains its previously stated position that the proposed core working hours are excessive and inconsistent with local policy and community expectations. The proposed core working hours are expected to cause noise and disruption to residents beyond what Thurrock Council considers reasonable.
- 3.2.4 Therefore, the Council continues to strongly recommend that the proposed core working hours should be amended to align with Thurrock Council's established standard core working hours. The Applicant has not provided any persuasive arguments that explain how and why the limited reduction in working hours suggested by Thurrock Council would jeopardise delivery of the scheme.
- 3.2.5 Additionally, the Council has repeatedly recommended that where the Applicant considers works outside the proposed core working hours as necessary, these should be managed on a case-by-case basis through the Section 61 prior consent process under the Control of Pollution Act 1974.
- 3.2.6 Whilst the Outline Code of Construction Practice ("OCoCP") [REP7-322] commits to securing Section 61 prior consent in relation to NV03, it does not provide a corresponding commitment to obtain Section 61 consent from the relevant local planning authority for works undertaken outside the proposed core working hours. The Council considers the Section 61 process would provide the Council with an appropriate level of oversight and represent a more proportionate and effective approach.
- 3.2.7 In its Response to Action Points for Issue Specific Hearing 3 [REP6-117], the Applicant failed to explain why the Section 61 consent process would be unsuitable for works undertaken outside the proposed core working hours. Therefore, the Council considers this technical issue has not been satisfactorily resolved and accordingly maintains its objection to the Project, as stated in its Relevant Representation.

3.3 Construction Traffic

- 3.3.1 Construction traffic impacts are an important issue for communities. The Applicant has partly addressed Thurrock Council's concerns about these impacts but the Applicant has also provided incomplete information to the Council, which has hindered the ability of the Council to work with the Applicant to reduce identified environmental effects that will arise from the scheme.

- 3.3.2 **Data Gathering and Key Assumptions:** Thurrock Council is currently reviewing data which was shared by the Applicant quite late in the examination process (at the beginning of July 2026), and which forms the basis of the environmental impact assessment undertaken for the scheme. The traffic impact assessment was based on primary survey data as well as secondary data from sources such as Department for Transport ("DfT") counters. The methodology used to generate results and draw conclusions regarding the baseline conditions as well as the future impact of the scheme require a further review of the data used and a better understanding of steps taken and assumptions made in the assessment.
- 3.3.3 **Junction Modelling:** Thurrock Council has reviewed the modelling results received from the Applicant including the revised modelling that was shared recently. Of the four modelled junctions, two are shown to operate well with the scheme in place and those two are most likely to be impacted by the proposals due to the close proximity to the Primary Access Route ("PAR") and Site Access Points ("SAP") network (Orsett Cock Roundabout and Stanford Road junction with Buckingham Hill Road). The remaining two (ASDA roundabout and J30 of the M25) show high levels of congestion although might be less directly impacted by the scheme PAR and SAP network.
- 3.3.4 **Mitigation Measures – ASDA Roundabout:** Thurrock Council acknowledges that the predicted impact of the proposed scheme on the ASDA roundabout is likely to be minimal, as it is not along a PAR or near a SAP. Nevertheless, the modelling carried out for the scheme identifies that the junction is expected to experience high levels of congestion during the scheme's construction programme, caused primarily by background traffic growth. Given the anticipated levels of congestion at the junction, Thurrock Council requires that a clear programme of measures is defined to minimise use of the junction by scheme traffic. This could be through re-timing, re-routing or other specific proposals to mitigate impacts that make the junction operation worse. This is particularly important if scheme-generated trips utilise Port of Tilbury for the delivery of goods. The Council welcomes dialogue with the Applicant on the matter and would like to co-operate with the Applicant to reduce impacts while enabling project delivery.
- 3.3.5 **Mitigation Measures – M25 Junction 30:** Thurrock Council reviewed the results of the junction modelling and understand that the junction is likely to expect high levels of congestion in the future. It is a key junction on the Strategic Road Network and its operation is critical for the wider road network. Mitigation must therefore be identified to limit the impact of scheme traffic on the junction. Thurrock Council understand that signal optimisation has already been proposed. The effects of this measure are being considered by National Highways, following recent meetings on the matter. Further management of the impact on the junction must be agreed between the Applicant and National Highways.

- 3.3.6 **Baseline and Future Trip Generation – Key Assumptions and Methodology:** Thurrock Council is reviewing information received from the Applicant regarding the methodology and key assumptions used to generate a baseline scenario as well as incorporating trip generation calculations for the scheme phases. Further dialogue will be necessary with the Applicant to address questions about the methodology applied as part of the calculations.
- 3.3.7 **Construction Vehicle Trips:** Thurrock Council acknowledge that the Applicant has forecast trip generation to evaluate daily traffic levels associated with the Overhead Line, Cable, Substations, project/office staff. Thurrock Council has no issue with the forecast traffic flows.
- 3.3.7.1 Thurrock Council, through the Statement of Common Ground ("SoCG") [REP7-100] have raised the issue of air quality impacts, with a specific query being raised in respect of Health and Wellbeing (ID 3.5.10):
- 'There is potential for construction traffic to have a significant negative impact on local air quality. Any potential impact on public rights of way or air quality will also cause issues for public health in the borough. The Applicant has not yet provided sufficient information to adequately assess these impacts, and so Thurrock Council is not satisfied that they will be effectively avoided or mitigated'.*
- 3.3.7.2 To date, no response has been received from the Applicant or the Applicant's Air and Noise consultant in response to the query. Thurrock Council require that the Applicant provides a robust response to address this issue.
- 3.3.8 **Overall Impact of the Project:** It is acknowledged that the supporting transport assessments (including those in the Environmental Statement ("ES") Chapter 16 Traffic and Transport [REP7-302]), and the impact and mitigation assessment aim to comply with the objectives of the overarching national, regional and local transport policy.
- 3.3.8.1 Notwithstanding the 'under discussion' items contained within the Applicant's supporting suite of traffic and transport documents, Thurrock Council is in the process of reviewing the most recently provided transport data and information, including data which supports the establishment of the baseline and future baseline traffic data. As mentioned, this information was provided quite late in the examination process and until this review is completed, Thurrock Council is unable to fully or appropriately comment on the impact of the development.
- 3.3.8.2 The Council has, therefore, reasonably concluded that further review of the information in relation to data collection and traffic forecasting is required to confirm the validity of the Applicant's assessments and the extent to which they are policy compliant.
- 3.4 Archaeological evaluation strategy
- 3.4.1 The impact of the Project on archaeological remains has been partly assessed through non-intrusive and intrusive archaeological evaluation. Full evaluation of the areas where there is potential to impact archaeological and geoarchaeological remains has not been completed.

As such, the impact on archaeological remains has not been established for the full extent of the scheme. Until full evaluation of the scheme is completed, the nature, complexity and significance of the archaeological remains cannot be fully determined. Therefore, there is potential for archaeological and geoarchaeological remains of high significance to be impacted by the scheme.

- 3.4.2 The evaluation of the remainder of the scheme will be completed post determination and a scheme for the completion of the evaluation has been agreed through key control documents and requirement wording. The key control documents relevant to archaeology and geoarchaeology (Outline Archaeological Management Strategy ("OAMS") and Outline Written Scheme of Investigation ("OWSI") [REP7-352]) have been revised to facilitate a more comprehensive assessment of the known and, as yet, unknown archaeological and geoarchaeological deposits that may be present within the scheme. Essex Place Services (on behalf of Thurrock Council) have worked towards agreement of the OAMS and OWSI documents with the Applicant, and they are considered sufficient to ensure the archaeological and geoarchaeological resource is adequately investigated and mitigation is appropriate. Agreement between the Council and the Applicant on this matter is reflected in the SoCG.
- 3.4.3 Thurrock Council (and Essex Place Services on behalf of the Council) welcome consultation with the Applicant and its archaeological consultants on public outreach to ensure the main works OWSI demonstrates commitment to delivering enhanced public understanding, benefit and legacy.

4 Outstanding Matters Raised During Examination

4.1 Outline Construction Traffic Management Plan – Implementation and Enforcement

- 4.1.1 Thurrock Council acknowledge the updates to the enforcement and non-compliance details within the 7.3 Outline Construction Traffic Management Plan ("OCTMP") Revision E [REP6-082], including the addition of the staged non-compliance procedure. Thurrock Council note that Stage Two of non-compliance is a contractor warning with instruction to prepare an Action Plan, and a further non-compliance is a further warning, and further non-compliance (post Stage Three) is dealt with by the formal dispute procedures of the contract. Therefore, in essence, it appears that a contractor can continue to be non-compliant for a further two stages after preparing an Action Plan without sanction.
- 4.1.2 Thurrock Council has requested that further detail is provided with regard to the sanctions which could be applied as a result of non-compliance as this is still lacking from the OCTMP, Revision F [REP7-338]. Thurrock Council expect to see details relevant to actual sanctions which may be employed for: minor breaches; repeated or moderate breaches; serious, legal or persistent breaches. Without this, Thurrock Council is concerned that contractors may view

breach of the OCTMP lightly despite the harm to the general public that may result from this behaviour.

- 4.1.3 While paragraph 6.3.4 of the OCTMP Revision F [REP7-338] states ‘further detail on the sanctions which could be applied will be included within the final Construction Traffic Management Plan’, it is not clear why this information cannot be provided now so that affected stakeholders can respond and submit concerns to the ExA. Thurrock Council expect this detail to be provided by the Applicant before the final version of the Construction Traffic Management Plan ("CTMP") so that the Council can be satisfied that this matter has been properly addressed.

4.2 Construction Access Approach/Primary Access Route Selection

- 4.2.1 The construction access strategy and designs, including PARs has been extensively discussed with the Applicant. Thurrock Council acknowledge the principles of the access strategy utilising the local road network as may be required to access the various SAPs.
- 4.2.2 Thurrock Council has requested various sets of data or supporting information which would have been used or prepared by the Applicant in the preparation of the 6.16 ES Chapter 16 - Traffic and Transport (APP-271) and the 7.11 Transport Assessment (APP-333) for the purposes of assessing the potential impacts of the scheme. The information was requested to enable Thurrock Council to undertake a review of the Applicant's assessment and conclusions.
- 4.2.3 To date, not all information requested has been provided and this has resulted in a protracted review period for Thurrock Council. The staggered release of information has also forced the Council to review the assessment information in isolated parts, preventing the Council from forming a contextual understanding of the assessments together with the scheme proposals. The Applicant issued some of the requested information on 10 and 13 July 2026 and Thurrock Council is currently reviewing this data. Thurrock Council cannot yet comment if it is satisfied with the requested information as provided.
- 4.2.4 Thurrock Council has accepted that Muckingford Road will be used by the Applicant for Light Goods Vehicles ("LGV") only. Thurrock Council has noted in 7.3 OCTMP, Revision F [REP7-338], Section 6 Implementation, Table 6.1 – Site Checks Relevant to the CTMP, the Applicant has amended the reference to monitoring construction ‘vehicle’ movements to ‘HGV’ movements.
- 4.2.5 Thurrock Council consider that through the implementation of the CTMP and Construction Workers Travel Plan, LGVs should also be monitored at SAPs and also on the PARs/ local road network. Given Muckingford Road is LGV only, Thurrock Council fully expect the Applicant to ensure that the use of Muckingford Road is monitored through the life of the CTMP, and where non-compliance is recorded, enforcement actions, mitigation and sanctions

are applied. These instances should be recorded within the CTMP and conveyed to Thurrock Council where necessary.

4.3 Highway Design (Site Access Points, Bellmouths, and Crossovers)

- 4.3.1 A series of highways mitigation designs were prepared for site access points, crossovers and bellmouths, all of which were considered insufficient in detail, information or accuracy for Thurrock Council to sign off at Stage 1 Road Safety Audit ("RSA1").
- 4.3.2 Subsequently, Thurrock Council discussed these preliminary designs and design requirements with the Applicant at length, allowing all but six designs to progress to detailed design stage and requesting further information or designs for the six designs ahead of re-audit at RSA1. The Applicant provided some further detail to Thurrock Council; however, this is of insufficient detail, design and lacks the additional information requested. Further, the Applicant made no commitment to progressing these designs through the RSA1 process.
- 4.3.3 Thurrock Council acknowledge that the Applicant does not intend to provide any further design details or RSA1 for these designs. In good faith, Thurrock has accepted this approach. Thurrock Council has advised the Applicant that all designs submitted at detailed design stage must provide sufficient detail, be of sufficient accuracy and respond to and address all safety and design issues identified at RSA1. The Applicant must adhere to the Stage 2 Road Safety Audit ("RSA") process and submit these designs to Thurrock Council for review and subsequent Stage 2 RSA.

4.4 Communication Strategy and Community Engagement

- 4.4.1 Throughout the examination, Thurrock Council has commented on the adequacy of the Applicant's communication strategy, community engagement and the complaints procedure. The Council acknowledges and welcomes the Applicant's revisions to the OCoCP and its appendices regarding community engagement and the complaints procedure.
- 4.4.2 However, the Council remains concerned that there is still uncertainty regarding the community liaison role. Paragraph 1.1.8 of OCoCP Appendix E – Community Engagement and Public Information [REP7-330] states:
"A detailed Communication Strategy, including the approach to community liaison, will be developed as part of the final Code of Construction Practice (secured by Requirement 4 of 3.1 draft DCO (Revision G))."
- 4.4.3 The role of the community liaison has not been sufficiently developed at this stage and this has prevented Thurrock Council from providing detailed feedback on this important aspect of community engagement.
- 4.4.4 The Council requires further clarification regarding its role in the communication and community engagement process, as well as the roles and responsibilities of other stakeholders including the community liaison. The Council plays a vital role in delivering

positive outcomes for the community, for example in helping local people understand the benefits of the scheme. The Council requests to be involved in development of the strategy and would welcome the opportunity to review and provide input as the work is implemented. The Council is uniquely placed to help the Applicant co-ordinate and engage with the local community.

4.5 Outline Employment and Skills Plan ("ESP")

- 4.5.1 Thurrock Council has set out its concerns regarding the Outline ESP in its deadline 6 submission [REP6-170]. One of these concerns is that the proposed stakeholder group lacks sufficient influence to shape the delivery of the ESP and that there is a lack of monitoring targets and measurable outcomes.
- 4.5.2 The Applicant has since updated the Outline ESP at deadline 7 [REP7-489]. This revision included more detail regarding the role of the stakeholder group with more detail on the process for the group's engagement to be set out in the Final ESP. The Council acknowledges this update and welcomes the inclusion of further details in the Final ESP.
- 4.5.3 However, there is still a lack of key performance indicators, quantified targets and measurable outcomes within the Outline ESP. The Council expects these details to be included within the Final ESP to enable effective monitoring, demonstrate the successful delivery of the strategy, and provide confidence that its objectives can be achieved and evaluated. This is particularly important given that, in accordance with amended DCO Requirement 15 [REP7-064], the Final ESP must be submitted for approval to the relevant host county authority and Thurrock Council prior to the commencement of development. The Final ESP must be sufficiently ambitious, and the Applicant must be accountable to its objectives.

4.6 DCO Requirement 11 - Biodiversity Net Gain ("BNG")

- 4.6.1 The Council's comments on Requirement 11 within the draft DCO are included in its deadline 7 submission [REP7-575]. Whilst the Council welcomes the Applicant's commitment to securing a minimum 10% BNG across the Order land, the Council remains concerned that the proposed DCO wording for Requirement 11 [REP7-064] does not provide any mechanism for review, approval or agreement by the relevant planning authority.
- 4.6.2 As currently drafted, compliance with the requirement is capable of being determined solely by the undertaker rather than subject to consultation with and/or approval of the Council. Major infrastructure projects usually submit a BNG Strategy for approval to the relevant planning authority prior to the commencement of the development.
- 4.6.3 Therefore, the Council would strongly recommend DCO Requirement 11 is reworded so that the BNG Strategy is submitted to the relevant local planning authority for approval. The Council has suggested some wording for this in its deadline 7 submission [REP7-575]. These

amendments would ensure that the Council has an appropriate level of oversight and feedback to ensure the proposed BNG measures are suitable, achievable and maintained.

4.7 Landscape Compensation

- 4.7.1 The Council's position on landscape compensation is in its deadline 6 [REP6-170] and deadline 7 [REP7-575] submissions. The Council has engaged with the Applicant on a draft DCO landscape compensation Article including meetings with its representatives.
- 4.7.2 The Council remains concerned that the Applicant's position is that it will only provide landscape compensation funds where the DCO Article is deemed necessary by the SoS. The Council disagrees with the Applicant's view that the funds are not otherwise required and considers that landscape compensation measures are needed to mitigate the residual landscape and visual effects of the Project and to offset the resulting harm experienced by the public. The Project will provide local benefits to communities but it is not in dispute that it will also result in serious landscape and visual impacts. Thurrock Council would like to work with the Applicant to compensate some of these impacts.
- 4.7.3 The Council is disappointed that Applicant has not agreed to the Council's preferred option of a Section 106 agreement to secure landscape compensation that would be compliant with applicable legal tests. Despite this, the Council has reviewed the draft DCO provision in Article 63 Schedule 20 (a) [REP7-064]. The Applicant identified land at Tilbury North, within the vicinity of the proposed Tilbury North substation, as a potential location for landscape compensation measures.
- 4.7.4 The Council is aligned with the other host local authorities' position, in particular Essex County Council, and arguments in favour of the legal and policy requirement for landscape compensation, offsetting and enhancement.
- 4.7.5 On this basis, the Council strongly recommends that the Applicant be required to provide landscape compensation, particularly given the scale of the proposed infrastructure and its anticipated significant landscape and visual impacts.

4.8 Drainage Strategy

- 4.8.1 NG has submitted a drainage layout of the development as part of the DCO submission and the Local Lead Flood Authority ("LLFA") is satisfied with the overall drainage proposal in principle. However, a detailed drainage strategy in accordance with National Standard for Sustainable Drainage ("SuDS") is required for each temporary and permanent site demonstrating the location, type, function, connectivity and operation of all proposed drainage features at the detailed design stage. It must include the following details:
 - 4.8.1.1 **Infiltration test:** infiltration test to be undertaken in accordance with BRE365 together with groundwater monitoring data to justify the proposed drainage hierarchy and demonstrate the suitability of infiltration-based drainage features.

4.8.1.2 Design events: All permanent drainage systems and attenuation basins must be designed to accommodate runoff generated by rainfall events up to and including the 1 in 100-year event with a 40% climate change allowance in accordance with the SuDS.

4.8.1.3 Discharge rate: The proposed discharge rate for each drainage catchment must be determined based on greenfield runoff calculations and shall demonstrate compliance with the SuDS, unless otherwise agreed by the LLFA.

4.8.1.4 Detailed hydraulic calculation: Detailed hydraulic calculations must be submitted to the LLFA to demonstrate that the proposed drainage system operates effectively during the specified design storm events up to and including 1 in 100-year rainfall plus 40% climate change. The calculations must confirm that adequate storage volumes are provided and that all drainage features function within their design capacity.

4.8.1.5 Water quality: The LLFA requires water quality risk assessment to be carried out based on the following:

- Low and medium polluted site – simple index approach
- High medium polluted site – water quality risk assessment in accordance with Environment Agency requirements

In addition, the Applicant must submit the water quality risk assessment for each individual outfall prior to discharge into watercourses.

4.8.1.6 Sedimentation control: Measures must be incorporated to effectively manage and treat sediment mobilisation arising from runoff generated within the construction areas, including pylon working areas and construction compounds, prior to discharge. Sufficient evidence should be provided to demonstrate that appropriate sediment control measures are implemented to prevent adverse impacts on the water quality of downstream watercourses and receiving waterbodies.

4.8.1.7 Overland flow route: The overland flows generated by the upper catchments must be considered for different locations as follows:

- For haul roads – The culverts shall have enough capacity to convey the overland flows for the rainfall event up to 1 in 100 plus 25% climate change.
- For permanent access roads – The culverts must have enough capacity to convey the overland flows for the rainfall event up to 1 in 100 plus 40% climate change.
- Substation: Surface water flows must be conveyed safely through and around the substation area without impeding existing flow routes. The design must demonstrate that runoff can be managed during storm events up to and including the 1 in 100-year plus 40% climate change, without increasing flood risk within the site or to surrounding land and property.

- Landscaping bunds: Where bunds form part of the landscaping proposals, their design and layout shall maintain safe overland flow routes and avoid impeding the conveyance of surface water. Drawing Ref. 12055-LUC-XX-XX-DR-L-0012 indicates the provision of a landscaping bund within the proposed substation area. In its current form, there is potential for the bund to impede overland flow paths, which could result in localised ponding, potential undermining of the bund due to seepage, and an increased risk of flooding. Satisfactory provisions must be provided within the design to ensure that the interception can be effectively managed and diverted to such a location within the boundary without increase in flood risk elsewhere. Given the flow of water towards the boundary of the Lower Thames Crossing project, early engagement must be carried out with National Highways and the LLFA to ensure that the cumulative impact and liability can be effectively managed.

4.8.1.8 **Water Quality Monitoring:** The details of water quality monitoring arrangements for both the construction phase and the operational phase shall be submitted to the LLFA, outlining how potential pollution risks will be managed and monitored throughout the lifecycle of the development.

5 Conclusion

5.1 While Thurrock Council appreciates that the Applicant has, at times, meaningfully engaged with the Council, Thurrock Council maintains its objection to the Norwich to Tilbury DCO application as there are unresolved issues identified in its Relevant Representation and further submissions to the ExA during the examination.

5.2 These issues are set out within this Closing Statement for the ExA and SoS to take into account in reaching their recommendation and decision making on the DCO application.

5.3 Thurrock Council welcomes the opportunity for continued engagement with the Applicant following the close of the examination, with a view to progressing discussions and seeking resolution of the matters identified in this Closing Statement and Thurrock Council's SoCG with the Applicant.