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Our ref SC83/123354/000043
Your ref EN020009

The Secretary of State for Energy Security and Net Zero
Energy Infrastructure Planning Delivery
Department For Energy Security and Net Zero
3 Whitehall Place
LONDON
SW1A 2AW

By email

Date 19 October 2026
Email [redacted]@TLT.com

Dear Secretary of State,

The National Grid (North London Reinforcement Project) Order 2014
Non-Material Change Application (NMC-1)
Response to Request for Information

1.1 Thank you for your letter dated 12 October 2026 requesting further information in relation to the application by National Grid Electricity Transmission Plc (the **Applicant**) for a non-material change (**NMC-1**) to The National Grid (North London Reinforcement Project) Order 2014 (S.I. No.2014/1052) (the **2014 Order**) (the **Request for Information**).

1.2 Before providing detailed responses to the Request for Information, we consider it might be helpful to briefly explain the approach taken in preparing the NMC-1 Application.

1.3 The NMC-1 application was prepared and submitted in accordance with the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 (the 2011 Regulations). In particular, the Applicant notes that regulation 4(2)(e) of the 2011 Regulations provides that an application for a non-material change must be accompanied by "*any documents and plans considered necessary to support the application*". The Applicant notes that this requires discretion to be exercised as to the documents and plans considered necessary to support an application, having regard to the nature and extent of the proposed changes.

1.4 In preparing the NMC-1 application, all plans and drawings certified under article 43 of the 2014 Order were reviewed. These certified plans and drawings dictate the nature and extent of the authorised development and where the proposed changes resulted in amendments being required, these plans were updated and substitutes provided.

1.5 Other supporting plans and drawings produced at the time of the application for the 2014 Order were not updated, firstly because they did not form part of the 2014 Order and secondly, because these were not considered to be necessary to support the application for the Proposed Changes.

1.6 In relation to the Request for Information, the Applicant has sought to respond as fully and constructively as possible within the timescale specified and in doing so has identified below those limited areas where further time is required to produce the information requested.

1.7 The Applicant's response to the matters raised is provided within **Appendix A** to this letter. Where further supporting documents have been produced, they are listed below and enclosed with this letter.

Yours faithfully

TLT LLP

TLT LLP
for and on behalf of National Grid Electricity Transmission Plc

Enclosures:

Enc 1 - Tottenham Bypass Wiring Methodology - MES Drawing No MES-NG-SBS-TD-A

Enc 2 - Plan of Trees to be Removed - Sheet 10 - NMC-1 comparison

Enc 3 - The National Grid (North London Reinforcement Project) Order 2014 - General Vesting Declaration dated 25 January 2019

Enc 4 - Tottenham Substation UKHabBaseline

Enc 5 - Supporting Statement – Table 2 – Register of replacement certified design drawings

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Appendix A – Response to Request for Information

Paragraph (s)	Request	Applicant Response
Coexistence		
3 - 4	The Environmental Statement (**ES**) sets out that the programme for the replacement conductor wires was scheduled to occur in two stages during 2015 to 2016 (volume 2 at paragraph 3.2.22). The programme for the works is set out in Document 6.3 – Figure 3.9 (ES Technical Figures – volume 3 August 2012). Please provide details of the updated proposed programme of work subject to NMC-1 including updated drawings to demonstrate any period of temporary coexistence of existing and replacement infrastructure during any switchover period. Specifically, the following drawings must be updated: a. A3/PTD/6283/051 (rev c) (Tower ZBC42-ZBC43 2015 Work (sheet 23 of 24); b. A3/PTD/6283/052 (rev c) Tower VC01-VC02 2015 Work (sheet 24 of 24); c. A3/PTD/6283/076 (rev c) Tower ZBC42-ZBC43 2016 Work (sheet 23 of 24); and	**Construction Programme** In respect of the proposed programme for the works which are the subject of the NMC-1 application (the **Relevant Works**), this is necessarily dependent upon a number of factors that cannot be fully confirmed until the NMC-1 application has been determined. These factors include the availability of network outages, which must be agreed with the electricity system operator and are subject to operational constraints on the transmission network. To support the Secretary of State's consideration of the NMC-1 application and in view of these variables the Applicant is preparing programme information to set out the anticipated sequence and duration of the Relevant Works from the date of the NMC-1 application being determined (this will be 'day 0' within the programme). This is considered the best approach to provide the Secretary of State with a clear and realistic programme of work, should the proposed design changes be approved. The above programme information is being collated and will be submitted to the Secretary of State as soon as possible. The Applicant also wishes to clarify that the Proposed Changes do not materially affect the wider phasing or sequencing of the wider North London Reinforcement Project construction works. The phases of the works authorised under the 2014 Order are set out in the written scheme of stages approved pursuant to Requirement 3 of the

	d. A3/PTD/6283/077 (rev c) Tower VC01-VC02 2016 Work (sheet 24 of 24). Please also provide an update to the programme of work set out in the ES.	2014 Order. As set out in the Applicant's responses to paragraphs 8 – 10 below, an updated staging plan will be submitted for the relevant planning authorities' approval to reflect the Proposed Changes, should the Secretary of State approve the NMC-1 application. Aside from the changes to the phasing plan required to reflect the Proposed Changes, which are limited to the removal of the existing Stages 3b and 3c, and the amendment of Stages 4b and 4c, the wider construction phasing programme for the Project would therefore remain unchanged. **Updated Construction Phasing Drawings** The Applicant notes that the drawings referenced in this request (A3/PTD/6283/051, 052, 076 and 077) do not form part of the certified plans as defined within article 43 of the 2014 Order; these were construction phasing drawings produced as part of the ES which accompanied the application for the 2014 Order. Now that the Project has moved into delivery, updated construction phasing drawings (*Tottenham Bypass Wiring Methodology - MES Drawing No: MES-NG-SBS-TD-A*) have been produced by the Applicant's contractor. These comprise of 10 drawings showing the delivery of the OHL bypass. The drawings show the erection of the new towers and stringing of the new overhead line conductors, the transfer of conductors from the existing towers, and the removal of the existing towers and conductors once the switchover is complete. Although presented in a different format to the drawings originally produced in support of the 2014 Order application, these drawings are readily available and provide a clear indication of the construction phases required to deliver the Proposed Changes and the coexistence arrangements requirement to deliver the Proposed Changes.

		Given that the construction phasing drawings do not form part of the certified plans, we trust that the enclosed drawings provide the Secretary of State with the information required in respect of the construction phasing and temporary coexistence of existing and replacement infrastructure.
Trees		
5	Please provide an updated drawing of A1/PTD/6283/122 Rev d to show which trees are to be removed and/or retained in relation to the proposed NMC. Details should be provided if trees are identified for removal or works.	A replacement of drawing A1/PTD/6283/122 Rev d did not accompany the NMA-1 application as this drawing does not form part of the certified Order plans and drawings, nor is it referenced within the 2014 Order, for instance in the context of the broad powers conferred by article 37(*Felling and Lopping of Trees*). As set out in the Assessment of Change submitted with the NMC-1 application under the sub-heading '*Landscape e.g. additional loss of trees and vegetation'*, Proposed Change 5 will allow existing vegetation to the east of Pymmes Brook to be retained. The resulting change to the *Plan of Trees to be Removed* (sheet 10) submitted with the 2014 Order application is that no trees / vegetation would be removed within the small area identified by the red rectangle situated to the southeast of Tottenham substation, on the eastern bank of Pymmes Brook, within Tottenham Marshes. To produce a replacement for drawing A1/PTD/6283/122 Rev d will take time as the original CAD file is no longer available. It has therefore not been possible to prepare an updated version of drawing A1/PTD/6283/122 Rev d within the deadline specified in the Request for Information. However, the Applicant has prepared the enclosed edits of the original *Plan of Trees to be Removed* (sheet 10) to illustrate the effect

		of the Proposed Changes on existing vegetation, namely a reduction in the extent of removal required (*Plan of Trees to be Removed – Sheet 10 – NMC-1 comparison)*. The Applicant notes that the areas affected by the proposed changes are primarily on developed land, with ZBC44 proposed to be located on existing hardstanding within the former bus depot and VC1R proposed to be located on a small area of grassland. However, the overhead line between tower ZBC44 and VC1R will oversail trees shown on the drawing A1/PTD/6283/122 Rev d immediately to the south of the existing Tottenham substation, and therefore tree removal in this location will still be necessary. Subject to the Secretary of State determining to make the Amendment Order subject of the NMC-1 application, full details of vegetation clearance, tree removal and replacement / mitigation planting required for the proposed OHL bypass (stage 4b works) will be contained within the stage 4b Ecology Management Scheme and Landscaping Scheme to be drafted and submitted to the relevant planning authority (Haringey Borough Council) for approval in accordance with Requirement 12.
Land Rights – Plot 390 – revised location of VC1R		
6	Please provide evidence of the rights that have been acquired by means of a General Vesting Declaration (**GVD**) made in exercise of the Applicant's powers under Article 25 of the Order in relation to Plot 390 and executed on 25 January 2019, as referred to in section 3.2, paragraphs 3.2.3 to 3.2.6 of the Supporting Statement dated May 2026.	Please find enclosed a copy of the General Vesting Declaration ("GVD") dated 25 January 2019; this was made in exercise of the Applicant's powers under article 25 of the 2014 Order. The Applicant refers the Secretary of State to the Second Schedule (page 76) and to Sheet 7 of 7 of the GVD Plans appended to the GVD, which demonstrate that the Applicant secured permanent rights over Plot 390.

Lease arrangements – Plot 383		
7	Please provide an update on discussions in respect of a variation to lease arrangements for Plot 383 with the Distribution Network Operator (**DNO**).	Discussions between the Applicant and the Distribution Network Operator ("DNO") regarding the lease arrangements required to accommodate the proposed OHL oversail are well advanced and progressing positively. The Applicant is the freehold owner of Tottenham substation and the surrounding land, and the lease in question is accordingly one granted by the Applicant to the DNO. As the Applicant is the landowner and grantor of the current lease and given progress to date in discussions with the DNO, the Applicant does not consider that there are any impediments to these arrangements being finalised, and the Applicant is confident that the accompanying agreement will be completed in due course.
Handling amendments to discharged requirements		
8 - 9	Please confirm whether amendments to previously approved discharge of requirement documents are to be submitted, together with details of the specific requirement. The Applicant may supply an up-to-date register for the discharge of requirements for ease of reference for the Secretary of State and consultees. If the Applicant is not intending to submit updated documents to the relevant discharging authority to supersede previously discharged requirements, please provide justification for not doing so.	The Applicant confirms that, should NMC-1 be approved, it would be necessary to update the written scheme of stages approved pursuant to Requirement 3 of the 2014 Order. An updated staging plan will accordingly be submitted to Haringey Borough Council, as the relevant planning authority, for approval. The updated staging plan will remove the existing Stages 3b and 3c (which relate to the underground cable bypass that is no longer proposed), amend Stage 4b to encompass the overhead line works which are the subject of the Proposed Changes at Tottenham, and amend Stage 4c to encompass the associated landscaping works. The works required to deliver the Proposed Changes will accordingly be contained primarily within the amended Stage 4b, with associated landscaping works falling within the updated Stage 4c.

		The full suite of relevant DCO Requirements will need to be discharged in respect of the those works prior to their commencement. The Applicant agrees that it will be necessary to submit details for approval pursuant to Requirements 3 (stages of authorised development), 5 (landscaping), 7 (highway accesses), 9 (construction traffic management plan), 10 (surface water drainage), Requirement 11 (contaminated land and groundwater), 12 (ecological management strategy), 13 (construction environmental management plan) and 14 (archaeology). The Applicant confirms that the documents required to discharge the relevant DCO Requirements for the amended Stage 4b and Stage 4c are well advanced in their preparation. Draft documents have been provided to statutory stakeholders, and the Applicant has been in close and ongoing engagement with the London Borough of Haringey, as the relevant planning authority, in relation to the updated staging plan and the discharge of DCO Requirements for these works. The Applicant intends to submit the necessary details for approval promptly, should the Secretary of State determine to make the Amendment Order that is the subject of the NMC-1 application. As the Proposed Changes will be contained entirely within the amended Stage 4b and 4c, no amendments to previously approved discharge of DCO Requirement documents relating to other stages will be required. It is not, therefore, necessary to amend or re-submit any previously approved details which were approved in respect of other stages of the Project as these are unaffected by the Proposed Changes.
Specific changes to requirements identified by the Secretary of State		

10	Amendments are required to the written scheme of stages (requirement 3), previously discharged by the respective authority most recently under application reference HYG/2026/0364. Please confirm if amendments to the previously approved scheme of stages document will be requested as a result of the NMC and if not, please provide justification for not doing so (considering in particular that a number of other requirements are based on requirement 3).	The Applicant confirms that the written scheme of stages approved pursuant to Requirement 3 of the 2014 Order will need to be amended should the Secretary of State determine to make the Amendment Order that is the subject of the NMC-1 application. As set out in the Applicant's response to paragraphs 8 – 9 above, in that event an updated staging plan will be submitted to the relevant planning authority for approval, removing stage 3b and 3c and amending Stage 4b and 4c to encompass the works that are the subject of the Proposed Changes at Tottenham.
11	There are a number of requirements, including requirement 3 (the written scheme of stages), 5 (Landscaping), 7 (Highway accesses), 9 (Construction Traffic Management Plan), 10 (Surface Water Drainage), 11 (Contaminated Land and Groundwater), 12 (Ecological Management Strategy), 13 (Construction Environmental Management Plan) and 14 (Archaeology), where development cannot commence until details of the particular subject of that stage have been submitted to and approved by the relevant discharging authority, and it is noted that in some instances, details may have already been discharged,	The Applicant notes that the request at paragraph 11 appears to be incomplete. Notwithstanding this, the Applicant has sought to provide a substantive response to the matters raised. If the Secretary of State considers that any aspect of this request has not been addressed, the Applicant would welcome clarification of the outstanding matters and will respond promptly. As set out in the Applicant's response to paragraphs 8 – 9 above, the works required to implement the Proposed Changes, if approved, will be contained primarily within the amended Stage 4b, with associated landscaping works falling within an amended Stage 4c. These works will be introduced by way of an updated staging plan submitted for approval pursuant to Requirement 3 of the 2014 Order. The full suite of requirements relevant to these works, including Requirements 5, 7, 9, 10, 11, 12, 13 and 14, will need to be discharged prior to their commencement. The documents required to discharge these Requirements are well advanced in their preparation, with draft documents having been provided to statutory stakeholders and the Applicant maintaining close and ongoing engagement with the London Borough of Haringey in this regard.

		As the works required to implement the Proposed Changes are confined to Stage 4b and 4c, the discharge of DCO Requirements in respect of other stages of the authorised development will not be affected. Details previously approved by the relevant discharging authority in connection with other stages remain valid and do not require amendment or re-approval as a consequence of the Proposed Changes.
12	The Wintering Bird Survey Report ref 2486718 in the HRA, Document ref: 101786-004 Rev A dated May 2026 states that all habitat clearance should be completed in September – October (inclusive), or alternatively in late February to avoid disturbance of wintering birds in the Lea Valley SPA. However, the original ES Volume 2 and the more recent Preliminary Ecological Appraisal Report (submitted in place of the Ecological Management Strategy required under Requirement 12 and approved by Haringey Council at various approval stages) states that vegetation clearance works can take place outside the main breeding period i.e., clearance can be undertaken between September and February. Please confirm how this mismatch between the approved and proposed documents will be resolved and confirm that vegetation clearance will not take place throughout November to January (inclusive) (in accordance with the most recent HRA Document ref 101786-004, submitted with the NMC application).	The Applicant acknowledges the apparent mismatch identified by the Secretary of State between the vegetation clearance windows referred to in the Wintering Bird Survey Report (ref 2486718) appended to the HRA (Document ref: 101786-004 Rev A) and those set out in the approved Preliminary Ecological Appraisal Report and the original ES. The Applicant welcomes the opportunity to clarify this matter. The Wintering Bird Survey Report was originally commissioned and carried out by RSK in 2025 to inform the design of the underground cable bypass of Tottenham substation, which formed part of the previously consented authorised development. That survey identified the presence of a small number of wintering birds within the cable bypass area and, on that basis, recommended that habitat clearance in that area be avoided during November to January (inclusive). Those recommendations were specific to the underground cabling works and the areas of land that would have been affected by them. This survey report was annexed to the HRA submitted with the NMC-1 application because it presented the best available ecological information at the time and its contents were relevant to demonstrating the presence (or otherwise) of wintering birds in the vicinity and that the Proposed Changes will not result in likely significant effects on the Lee Valley SPA/Ramsar site.

		Recommendations contained within the survey report itself related to the original cabling works and the areas of land that would have been affected by them. They did not relate to the Proposed Changes, nor were those measures relevant to the screening conclusions stated in the HRA (given that such measures cannot be taken into account at screening stage in any event). Should the Secretary of State be minded to approve the proposed changes set out in the NMC-1 application, the underlying works giving rise to those recommendations will no longer take place. The Applicant accepts that the above could have been made clearer within the documentation submitted with the NMC-1 application. In particular, it could have been more explicitly stated that the recommendations regarding avoidance of works during November to January contained in the annexed survey report were specific to the cable bypass works, rather than being recommendations of the HRA itself. The Applicant further notes that the Stage 4a works at Tottenham (comprising the formation of a construction access) were approved by the London Borough of Haringey in June 2026 under planning application reference HGY/2026/1497. That application was supported by a habitat baseline plan, which demonstrates that the areas impacted by the Proposed Changes are primarily on developed land, with the ZBC44 to be located on an area of existing hardstanding within the former bus depot and VC1R to be located on a small area of neutral grassland. A copy of the habitat baseline plan is enclosed with this letter. Natural England was consulted on that application and raised no objection. In particular, Natural England considered the impact of the proposed development subject of application reference HGY/2026/1497 on European sites and advised that a likely significant effect could be ruled out.

		In anticipation of the of the NMC-1 Application being determined, the Applicant has also shared with Natural England a draft Ecological Management Strategy for the amended Stage 4b works. Subject to the NMC-1 Application being approved, the Ecological Management Strategy would subsequently be submitted for the purposes of discharging Requirement 12 in respect of those works. Natural England has confirmed that it has no comments on the draft. In light of the above, the Applicant confirms that the mismatch identified by the Secretary of State does not affect the conclusions of the HRA or the ecological assessments submitted with the NMC-1 application. The restriction on vegetation clearance during November to January was a recommendation contained in the annexed survey report and related solely to the cable bypass works which will no longer take place should the NMC-1 application be approved.
Drainage Plan – Outdoor Sealing End (ODSE) compound 1 – Tottenham		
13	There is an intentionally blank sheet in drawing 22/BC/0969/Sheet 14 (issue NMC-1A) title – Tottenham substation 400kV Overhead Line Bypass Elevation Plan. This supersedes a drawing of the drainage plan for ODSE Compound 1 Tottenham. The proposed tower ZBC44 would be located within the northern part of the drainage area shown. Please provide an updated plan to show any changes to the drainage plans for this area accompanied by written details of any changes.	The Applicant can confirm that the drainage plan previously shown on drawing 22/BC/0969/Sheet 14 was prepared exclusively in connection with the Outdoor Sealing End (ODSE) Compound 1 at Tottenham. The drainage design was specific to the ODSE compound infrastructure, which comprised a fenced enclosure with a gravel base surrounding the sealing end equipment. It was the particular characteristics of that compound, notably the impermeable surfacing, that gave rise to the need to manage surface water drainage in that area. The drawing was not, and was not intended to be, a general drainage plan for the wider area. The Proposed Changes would remove the ODSE compounds entirely from the scheme at Tottenham. The underground cable bypass, and with it the associated sealing end compounds, are no longer proposed. The removal of the ODSE compound therefore removes

	If there are no changes to this area, this should be set out clearly, particularly where the ZBC44 tower would fall within part of the ODSE compound shown.	the infrastructure that necessitated the drainage plan, and accordingly Sheet 14 has been intentionally left blank in the drawings submitted with the NMC-1 application. There is no replacement drainage plan to provide because there is no longer any requirement for one. The Applicant acknowledges that the proposed tower ZBC44 would be located within the area previously shown on Sheet 14. However, the presence of a tower within that area does not give rise to any surface water drainage requirement. Tower foundations will be piled, and unlike the ODSE compound, a tower does not introduce impermeable surfacing or other infrastructure that would necessitate surface water drainage management. There is therefore no change to any drainage arrangements to report in respect of this area.
Other plans/drawings		
14	In addition to any certified plans referred to above, if there are plans in the ES that need to be updated these should be provided. This includes drawings numbered: a. A3/PTD/6283/051 rev c - Tower ZBC42-ZBC43 2015 Work (sheet 23 of 24); and b. A3/PTD/6283/076 rev c - Tower ZBC42-Zbc43 2016 Work (sheet 23 of 24).	The Applicant confirms that there are no further plans or drawings in the ES that it considers necessary to update beyond those already submitted with the NMC-1 application or being prepared in response to this Request for Information. The Applicant notes that drawings A3/PTD/6283/051 rev c and A3/PTD/6283/076 rev c, referenced in this request, are the same drawings identified at paragraphs 3 – 4 above. As set out in the Applicant's response to those paragraphs, programme information and any relevant supporting drawings are being prepared and will be provided to the Secretary of State as soon as possible.
Plan/document reference inconsistencies		

15	There are a number of plan reference discrepancies across plans listed in the cover letter dated 13 May 2026, annex B of the Supporting Statement and the proposed amendment Order. Drawings submitted are numbered and titled correctly in the tracked amendments to the 2014 Order, but the drawing registers in the cover letter and Supporting Statement contain inconsistencies. Please provide an updated drawing register that correctly corresponds to the tracked changes document to the 2014 Order.	The Applicant acknowledges the plan reference discrepancies identified by the Secretary of State within Annex B of the Supporting Statement. The Applicant has reviewed the drawing references and considers that all references provided within the covering letter to the Application and within the draft Amendment Order are correct. A corrected version of Table 2 to replace that contained within Annex B of the Supporting Statement is enclosed.
16	Please provide an updated tracked changes to the 2014 Order, showing all amended drawing numbers and update any other submitted documents accordingly.	As noted above, the 2014 Order submitted with the NMC-1 application correctly recorded all amended drawing numbers, as did the covering letter to the Application. No further updates are therefore considered to be required.