



Planning Inspectorate

Norwich to Tilbury – EN020027 National Grid Electricity Transmission

Section 51 Advice Log Version: 30 June 2025

There is a statutory duty under ['section 51 \(s51\) of the Planning Act 2008'](#) for The Planning Inspectorate to record the advice that it gives in relation to an application or potential application, and to make this publicly available.

This document comprises a record of the advice that has been provided by The Planning Inspectorate to the applicant (National Grid Electricity Transmission) and their consultants during the pre-application stage. It will be updated by The Planning Inspectorate after every interaction with the applicant during which s51 has been provided. The applicant will always be given the opportunity to comment on The Planning Inspectorate's draft record of advice before it is published.

The applicant will use this advice log as the basis for demonstrating regard to s51 advice within the application.

Project name s51 Advice Log - Index	
Date of meeting	Meeting overview
19 March 2025	<ol style="list-style-type: none"> 1. Introductions 2. Project Update 3. Targeted consultation 3D Creative Model 4. Lands – Class of rights & Heads of Terms 5. Application submission and Examination preparation 6. Environment surveys and update on submission documents 7. AOB
30 June 2025	<ol style="list-style-type: none"> 1. Introductions 2. Project Update 3. Examination readiness 4. Look ahead 5. Interactive Design Portfolio 6. Pre-application Issues and PMIE 7. Adequacy of Consultation Milestone 8. Lands – Special Category Land, Crown & Landowner Engagement 9. AOB
30 June 2025	Feedback on Adequacy of Consultation Milestone (AoCM)

Project name - s51 Advice Library	
Topic	Meeting date: 19 March 2025
Targeted consultation 3D Creative Model	The Inspectorate suggested that if the applicant intended to submit the 3D Creative Model as part of its application documents at acceptance that screenshots of its use would be more suitable due to the size of the programme files.
Land Rights	<p>The Inspectorate advised the applicant to indicate as early as possible how much potential land interest there is, particularly special category and crown land, as this will assist the Inspectorate in deploying resources effectively.</p> <p>The Inspectorate encouraged progressing discussions with The Crown Estate as early as possible in relation to crown land.</p>
Preparation for submission	The Inspectorate will update the applicant on progress of the submission portal at the next meeting, but the applicant should consider an alternative way to submit its application in the event that the portal is not live at the time of submission.
Examination preparation (site visits)	The Inspectorate advised the applicant to submit, as part of its application documents, a list of sites that is considered beneficial for the Examining Authority to visit and whether those sites can be viewed from public land.
Examination preparation (hearings)	The Inspectorate noted that the applicant had provided a list of potential hearing venues. The Inspectorate advised that the locations for hearings will depend on the areas Relevant Representations are submitted although it was acknowledged that it will likely be spread across the entire route of the project.
Examination preparation (hearings)	The Inspectorate advised the applicant that it may be necessary to hold concurrent hearings during the examination, due to the scale of the project, with both virtual and physical attendance, and as such early liaison with Audio Visual company/s is key. This could also require the applicant's team to be in attendance at different locations.
Supplementary Environmental Information (SEI)	The Inspectorate explained to the applicant that the adequacy of the Environmental Statement baseline survey data will be a judgement taken at the acceptance stage. The Inspectorate will need to be confident that all significant effects have been identified and assessed. The Inspectorate

	<p>noted that there is some precedence for surveys to not be 100% complete at the point of DCO application, however advised that this does still pose a risk to the acceptance and examination phases, in particular in relation to the outstanding heritage surveys which, based on the applicant's programme, would not be available before the start of examination.</p> <p>The Inspectorate advised the applicant to provide a robust justification for its approach in the relevant application documents. The applicant should clearly set out in the application documents the dates for the submission of any outstanding information and how that will correspond to the overall timescales for examination. The application documents should also explain the intended approach if any new features are found to be present that weren't present in earlier surveys.</p> <p>In relation to heritage, the applicant explained that it had discussed and agreed the level of baseline data to be available at the point of DCO application with relevant consultation bodies. The applicant was advised to present evidence of such agreement with relevant consultation bodies (for both ecology and heritage) with the application.</p>
SEI	<p>The Inspectorate advised, regarding the progress of the environmental surveys, that there is a risk that if supplementary information is not proposed to be submitted until the pre-examination stage it could (if the application is accepted) result in a delay to the preliminary meeting.</p> <p>The Inspectorate questioned the drivers for the submission of the SEI post submission of the application, rather than as part of the application, to minimise risk to the acceptance and examination stages. The applicant confirmed this was due to access difficulties and the sheer volume of survey work needed for a proposed development of this scale.</p>
Any Other Business	<p>The Inspectorate advised the applicant to allow for an appropriate amount of time between the next project update meeting and when the draft documents advice is issued. The Inspectorate requested that if the applicant has any specific queries on the draft document advice to raise them before the next project update meeting to ensure the appropriate people were available to provide the advice.</p>
Any Other Business	<p>The Inspectorate highlighted recent guidance published by DEFRA for relevant authorities, on seeking to further the purpose of protected landscapes. The applicant was advised</p>

	to clearly set out in the application documents how it had complied with that duty.
Any Other Business	The applicant was advised to take account of the new Environment Agency flood risk data (published 2025) in relevant assessments.
Any Other Business	The applicant was advised that with reference to the mitigation hierarchy, the Environmental Statement should clearly distinguish between measures proposed to mitigate or compensate significant adverse effects on the environment, from those which are enhancement/ Biodiversity Net Gain.
Any Other Business	The Inspectorate advised the applicant to consider discussing with the Local Authorities the possibility of co-ordination and appointing representatives to assist the examination. This was particularly helpful on the Southampton to London Pipeline project where Counsel represented several local authorities at hearings.

Topic	Meeting date: 30 June 2025
Examination readiness	The applicant asked the Inspectorate how it should submit its application. The Inspectorate advised the applicant that SharePoint will be the method for submission, with the Inspectorate providing a secure link for the applicant to add documents to. It was agreed to test this ahead of submission.
Examination readiness	The applicant advised that it is preparing a guide to site visits for inclusion in the application documents. The Inspectorate requested that this document is submitted as a stand-alone document, rather than an annex to other documents.
Examination readiness	The Inspectorate advised the applicant to discuss with audio and visual providers the ability to potentially cover multiple simultaneous events.
Examination readiness	<p>The Inspectorate advised the applicant that for long linear projects, where possible, a central venue approximately halfway along the route is considered for the preliminary meeting, with potential localised hearings later in the examination. With that in mind, Colchester could be a potential location for the meeting; this will be considered by the Examining Authority in due course.</p> <p>The Inspectorate advised the applicant that there are multiple factors that can impact the preliminary meeting date, and as a result the Inspectorate is unable to give any indication as to likely dates at this time. The Inspectorate advised that once an Examining Authority is appointed, consideration of the preliminary meeting date will commence.</p> <p>Whilst the Inspectorate is not seeking to unnecessarily prolong the pre-examination period, and seek to keep it as brief as possible, there are a number of factors that influences this, including the quality of the application/need for s51 advice and the timing of the relevant representations period. The Inspectorate also advised the applicant that if a change request is received during the pre-examination stage, which triggers the Infrastructure Planning (Compulsory Acquisition) Regulations 2010, this could delay the commencement of the examination. Additionally, the submission of supplementary environmental information mentioned in previous update meetings, during the pre-examination period, could delay the commencement of the examination.</p>

Look ahead	The Inspectorate noted the applicant's intention for the relevant representation period to be longer than the statutory minimum and confirmed this is good practice, particularly due to the scale of the project.
Electronic Index	The Inspectorate advised the applicant that the electronic index is being updated and will be provided to the applicant once complete.
Look ahead	The Inspectorate requested that any confidential data within the applicant's submission, for example in relation to protected species, be submitted as an annex to a report, rather than marking a report in its entirety as confidential.
Look ahead	The applicant asked the Inspectorate whether there is any emerging practice for large scale examinations that the Inspectorate can share, and highlighted recent approaches taken on Lower Thames Crossing (earlier hearings and later written questions) and Immingham Green Energy Terminal (draft written questions published in advance of the preliminary meeting).
Interactive Design Portfolio	<p>The Inspectorate highlighted the importance of clearly explaining how the design documents interact with each other.</p> <p>The Inspectorate asked the applicant whether the proposed approach to design documents had been shared with the local authorities in advance of the submission of the application, if there is likely to be a requirement in the draft DCO for the authorities to approve the detailed design in due course. The applicant confirmed that this matter is under consideration.</p> <p>The Inspectorate also asked whether the project had been subject of an independent design review, to which the applicant confirmed it had not, providing its reasons for this. The Inspectorate advised the applicant to clearly explain the rationale and design decisions within its application, demonstrating its regard to the good design and linear project advice pages.</p>
Potential main issues for the examination (PMIE)	The applicant asked if it is required to submit a PMIE with the DCO application. The Inspectorate explained that the PMIE is one of the mandatory components of the pre-application service and therefore should be submitted. The Inspectorate noted that the PMIE has been included as a stand-alone document on recent projects.

	<p>The applicant asked how it should proceed if the PMIE hasn't been shared with the local authorities. The Inspectorate advised the applicant to clearly explain where discussions reached with local authorities in relation to potential issues at the point of application submission.</p>
<p>Adequacy of Consultation Milestone (AoCM) / Ongoing stakeholder engagement</p>	<p>The Inspectorate advised that setting out local authority concerns in the AoCM was extremely helpful. The Inspectorate informed the applicant it will issue its response to the AoCM shortly.</p> <p>The Inspectorate asked the applicant whether it had recently engaged with any action groups. The applicant confirmed that although it had previously met with an action group, which included very senior officials from the applicant's team, no recent discussions have taken place. The Inspectorate recommended the applicant document this in the Consultation Report.</p> <p>The applicant asked whether the Inspectorate can request consultation responses in the acceptance period. The Inspectorate confirmed that it can but will only request them where it is considered essential.</p> <p>The applicant then asked whether it should submit the adequacy of consultation milestone with its Consultation Report. The Inspectorate responded that it can be included as an annex to the Consultation Report, if necessary, but reminded the applicant that the milestone had already been received and that advice on it would already have been issued.</p>
<p>Lands – Special Category Land, Crown & Landowner Engagement</p>	<p>The Inspectorate asked the applicant about the progress of securing crown consent for crown land. The applicant responded that it was in discussions with the Crown Estate about this matter. The Inspectorate reminded the applicant of the risk to timescales if consent is not given.</p>
<p>Lands – Special Category Land, Crown & Landowner Engagement</p>	<p>The Inspectorate asked the applicant whether there are land agents acting on behalf of multiple landowners, and if so, whether discussions had commenced with those parties. The applicant confirmed that land agents are in place and that discussions are ongoing. The Inspectorate reminded the applicant that it is helpful to clearly state that discussions had commenced with landowners as part of the application documents.</p> <p>The Inspectorate then asked whether discussions had commenced with all statutory undertakers around protective provisions. The applicant confirmed that discussions have commenced with all parties, albeit at various stages of</p>

	progression. The Inspectorate noted that protective provisions is a matter that engages considerable examination time, and as such, early progression of these matters can assist a smoother examination.
AOB	The Inspectorate advised the applicant that if new NPSs are adopted after an application has been submitted, the Examining Authority can issue procedural decisions to ask all parties for views on the impacts of new NPSs.
AOB	The applicant asked how it demonstrates regard to the Inspectorate's s51 advice. The Inspectorate explained that it is at the applicant's discretion how this is done. The applicant is required to clearly demonstrate its regard to s51 advice issued by the Inspectorate, and if advice has not been followed, clear rationale for this approach must be included.
Topic	Feedback: 30 June 2025
Adequacy of Consultation Milestone (AoCM) Feedback	<p>The applicant's AoCM statement has been prepared and submitted having had regard to the government's statutory pre-application stage guidance as well as the Inspectorate's non-statutory 2024 Pre-application Prospectus. Having reviewed the applicant's AoCM statement, the Inspectorate considers that it clearly explains the applicant's consultation activities undertaken to date and the approaches set out in its Statement of Community Consultation (SoCC). As such, the Inspectorate does not consider the consultation to be seriously adrift (as described in guidance).</p> <p>The applicant should ensure that the Consultation Report clearly demonstrates how landowners, including Raydon Airfield, have been consulted. The report should also clearly explain the applicant's justification for undertaking targeted consultation, as opposed to multiple rounds of full consultation.</p> <p>The Consultation Report should also clearly explain how the applicant has complied with the 'Gunning' principles when undertaking consultation. It should also clearly respond to concerns raised by local authorities, which were included in the AoCM, such as Tendring District Council's concerns about the consultation not being meaningful or effective.</p> <p>The PA2008 does not require an applicant to share draft submission documents during consultation periods. However, the Consultation Report should explicitly set out what documents were available for review during the consultation periods.</p>

	<p>That said, it would be extremely helpful to any future examination of the application if draft documents (such as the dDCO) could be shared with key stakeholders ahead of the submission of the application.</p> <p>The Inspectorate's comments on the applicant's AoCM statement are made without prejudice to any decision on whether to accept the application for examination.</p>
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