

AENC-NG-CNS-REP-0012

Norwich to Tilbury

Volume 5: Reports and Statements

Document: 5.8 Potential Main Issues for Examination

Final Issue A

August 2025

Planning Inspectorate Reference: EN020027

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

nationalgrid

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1. Introduction

- 1.1.1 National Grid has developed plans for Norwich to Tilbury (referred to as the 'Project' in this report). 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.
- 1.1.2 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.
- 1.1.3 The Project is a Nationally Significant Infrastructure Project, and National Grid is seeking development consent under statutory procedures set by government.
- 1.1.4 The Potential Main Issues for Examination report ('PMIE') is entered into the examination as an application document. The document lists the potential main issues and elements of the Project that are not fully agreed with statutory bodies or Local Authorities on submission. By listing these potential main issues, the document facilitates a greater level of preparation for examination. The PMIE is intended to be a short document, and where possible be agreed with the relevant Local Authorities and statutory bodies.
- 1.1.5 The PMIE represents a snapshot in time, with the Project still subject to consultation, iterations, ongoing engagement and changing policy leading up to submission of the application. It does not address all comments but the main comments only. The PMIE captures potential issues at a programme level, with location-specific aspects captured in Statements of Common Ground (SoCGs) (document references 5.9.1 to 5.9.32) and the Consultation Report (document reference 5.1).

2. Potential Main Issues for Examination

- 2.1.1 In accordance with the appropriate guidance, the Nationally Significant Infrastructure Projects: 2024 Pre-Application Prospectus (Planning Inspectorate, 2024), a PMIE report has been prepared.
- 2.1.2 The draft PMI table was circulated to the relevant Local Authorities and statutory bodies on the 18 July 2025 and a period of 14 days was given for a response. Where a request was made for an extension of time to respond, that request was allowed. All responses received before the 08 August 2025 have been considered and included in Appendix A of the document. The draft PMI table was formulated through engagement with stakeholders and populated with issues raised through regular engagement meetings, with these issues captured in the SoCGs. Where the Applicant believes an issue is a potential main issue for examination, these have been included in the PMI table.
- 2.1.3 The PMI table was circulated to the host Local Authorities (where the Project and Limits of Deviation are located within Local Authority boundaries) and statutory bodies. A statutory body included an organisation where the Applicant had engaged with at the pre-application stage, and potential issues had been identified through the engagement.
- 2.1.4 Stakeholders were asked to confirm whether they agreed with the issues the Applicant had identified as potential main issues for the examination, and the likelihood that each issue could be resolved. Thirteen responses were received and are included in Appendix A for reference.
- 2.1.5 Table 1.1 represents a list of the issues that the Applicant considers to be the potential main issues for the examination. It includes the issues initially identified by the Applicant, as well as additions made based on responses to the PMIE consultation. Three potential main issues were added to the table following the stakeholder responses.
- 2.1.6 Other matters raised by the stakeholders, not considered to be potential main issues for examination have not been included in the table. While the Applicant recognises concerns raised on other matters, in the interest of keeping the document succinct and focussed on the main issues, matters raised not considered to be potential main issues for the examination have been excluded.
- 2.1.7 Some RAG ratings were changed and other amendments made following feedback from the stakeholders.
- 2.1.8 A RAG status has been assigned to each potential main issue and has been determined as the following:
- **Red** – Based on the current best information available and the material considerations to balance, the Applicant is either unlikely or not prepared to change its position on the potential main issue and therefore the issue is unlikely to be resolved
 - **Amber** – The Applicant believes there is an opportunity to resolve the potential main issue, although a way forward has not yet been agreed with the stakeholder

- **Green** – The Applicant is working with the stakeholder and/or has found a way to resolve the potential main issues, and this is likely to be resolved during the examination.

Table 1.1

Ref	Description of Issue	Affected Stakeholder(s)	Signposting (to Application Evidence)	RAG	Likelihood of the Issue Being Resolved During the Examination
PMI 1	Offshore and Underground Alternative Route/s: Objection to the current 400 kV overhead power line. Desire for an offshore option, or where this proves undeliverable then support given to an underground cable route.	<ul style="list-style-type: none"> Basildon BC Babergh Mid Suffolk DC Braintree DC Brentwood BC Chelmsford CC Colchester CC Essex CC Norfolk CC South Norfolk CC Suffolk CC Tendring DC Thurrock C 	<ul style="list-style-type: none"> 5.9 Statements of Common Ground (5.9.1 to 5.9.12) 6.3 Environmental Statement: Chapter 3 (Alternatives) 7.17 Strategic Options Backcheck and Review (SOBR) 	Red	The applicant has assessed an equivalent offshore option. To deliver the same capacity as the overhead line, three subsea cables and associated onshore infrastructure would need to be built. It is not likely the Applicant and the stakeholders will reach agreement on this issue.
PMI 2	East Anglia Connection Node (EACN): Substation location and cumulative effects.	<ul style="list-style-type: none"> Tendring DC Colchester CC Essex CC 	<ul style="list-style-type: none"> 5.9 Statements of Common Ground (5.9.3, 5.9.7 & 5.9.8) 5.15 Design Development Report (DDR) - Chapter 6 (Section C) 	Amber	The applicant has considered a number of alternative sites for the EACN. The applicant's proposed location remains the preferred site based on all assessments.
PMI 3	Routeing Alternatives: Alternative routes utilising overhead lines, rather than undergrounding or offshore alternatives as captured by PMI 1.	<ul style="list-style-type: none"> Basildon BC Babergh Mid Suffolk DC Braintree DC Brentwood BC Chelmsford CC 	<ul style="list-style-type: none"> 5.9 Statements of Common Ground (5.9.1 to 5.9.12) 6.3 Environmental Statement: Chapter 3 (Alternatives) 	Amber	Further discussion around assessments and mitigation have been discussed in the appropriate thematic group meetings and will be presented in the Environmental Statement. The Applicant believes

Ref	Description of Issue	Affected Stakeholder(s)	Signposting (to Application Evidence)	RAG	Likelihood of the Issue Being Resolved During the Examination
		<ul style="list-style-type: none"> Colchester CC Essex CC Norfolk CC South Norfolk DC Suffolk CC Tendring DC Thurrock C 	<ul style="list-style-type: none"> 5.15 - Design Development Report (DDR) – Chapter 2 (Project wide considerations relevant to design development) - Section 2.5 		there is an opportunity to resolve the issue.
PMI 4	Impacts on Third Party Developments: Instances where the Project interfaces with third party developments, that are either at the consenting stage or in construction.	<ul style="list-style-type: none"> Essex CC Brentwood BC Basildon BC Thurrock C Babergh Mid Suffolk DC Suffolk CC 	<ul style="list-style-type: none"> 5.9 Statements of Common Ground (5.9.2, 5.9.3, 5.9.4, 5.9.6, 5.9.11, 5.9.12) 5.15 - Design Development Report (DDR) – Chapters 4-11 (Sections A to H) 5.6 Planning Statement 	Amber	The applicant has taken into account the potential effect of its proposals on third parties when developing the route alignment. The Applicant believes there is an opportunity to resolve the issue.
PMI 5	Impacts on Statutory Undertakers: Ongoing discussions with statutory undertakers to protect third party infrastructure.	<ul style="list-style-type: none"> Network Rail Anglian Water British Pipeline Agency 	<ul style="list-style-type: none"> 5.9 Statements of Common Ground (5.9.24, 5.9.26) 	Amber	The applicant will continue to engage with these organisations prior to examination, with a view of resolving outstanding issues. The Applicant believes there is an opportunity to resolve the issue.
PMI 6	Airfields: Impacts on civil aerodrome sites	<ul style="list-style-type: none"> Civil Aviation Authority Babergh Mid Suffolk DC Norfolk CC South Norfolk DC 	<ul style="list-style-type: none"> 5.9 Statements of Common Ground (5.9.1, 5.9.2, 5.9.3, 5.9.5, 5.9.6, 5.9.22, 5.9.23, 5.9.32) 6.15 Environmental Statement – Chapter 	Red	The Applicant's assessment is set out in the Summary of Aviation Impact Assessment. It is not likely the Applicant and all the Stakeholders will reach a resolution on this issue.

Ref	Description of Issue	Affected Stakeholder(s)	Signposting (to Application Evidence)	RAG	Likelihood of the Issue Being Resolved During the Examination
		<ul style="list-style-type: none"> Suffolk CC Essex CC Individual Airfield Operators 	15 – Appendix 15.2 (Review of Aviation Impact) 6.15.A2		
PMI 7	Construction Access Approach and Route Selection: The proposed approach for Project construction access, and specific routes on the local road network.	<ul style="list-style-type: none"> Norfolk CC Suffolk CC Essex CC Thurrock C National Highways 	<ul style="list-style-type: none"> 5.9 Statements of Common Ground (5.9.1, 5.9.2, 5.9.3, 5.9.4, 5.9.20) 7.3 - Outline Construction Traffic Management Plan 7.11 - Transport Assessment 	Amber	The Project will continue to discuss construction access approach and route selection with stakeholders. The Applicant believes there is an opportunity to resolve the issue.
PMI 8	Interactions with the Lower Thames Crossing (LTC) Project.	<ul style="list-style-type: none"> National Highways Lower Thames Crossing Thurrock C 	<ul style="list-style-type: none"> 5.9 Statements of Common Ground (5.9.4, 5.9.20) 5.15 - Design Development Report (DDR) – Chapter 11 (Section H) 	Amber	The applicant is engaging with the LTC project on a series of design workshops with a view to resolving the issues and mitigating impacts of the interface between both projects. The Applicant believes there is an opportunity to resolve the issue.
Additional Potential Main Issues Added Following Stakeholder Responses:					
PMI 9	Design, Landscape and Visual Impacts: The visual effects of the Project and its interaction with landscapes and the National Landscape.	<ul style="list-style-type: none"> Thurrock C Colchester CC Braintree DC Tendring DC Suffolk CC Essex CC Brentwood BC 	<ul style="list-style-type: none"> 5.9 Statements of Common Ground (5.9.2, 5.9.3, 5.9.4, 5.9.6, 5.9.7, 5.9.8, 5.9.9, 5.9.11) 6.13 Environmental Statement: Chapter 13 	Amber	The Project will continue to engage with stakeholders on these matters with a view to resolution. The Applicant believes there is an opportunity to resolve the issue.

Ref	Description of Issue	Affected Stakeholder(s)	Signposting (to Application Evidence)	RAG	Likelihood of the Issue Being Resolved During the Examination
		<ul style="list-style-type: none"> Braintree DC Babergh Mid Suffolk DC Dedham Vale National Landscape and Suffolk & Essex Coast & Heaths National Landscape 	(Landscape and Visual)		
PMI 10	DCO Requirements and Management Plans: Agreement not reached on wording of Requirements in relation to traffic, working hours and mitigation proposals.	<ul style="list-style-type: none"> Babergh Mid Suffolk DC Norfolk CC Thurrock C Brentwood BC Essex CC 	<ul style="list-style-type: none"> 5.9 Statements of Common Ground (5.9.1, 5.9.3, 5.9.4, 5.9.6, 5.9.11) 7.2 Outline Code of Construction Practice (CoCP) 7.3 Outline Construction Traffic Management Plan 	Amber	The Project will continue to engage with stakeholders on these matters with a view to resolution. The Applicant believes there is an opportunity to resolve the issue given that similar wording to that of the Bramford to Twinstead DCO is employed in some instances.
PMI 11	Potential Impacts to Designated and Non-Designated Heritage Assets	<ul style="list-style-type: none"> Babergh Mid Suffolk DC Suffolk CC 	<ul style="list-style-type: none"> 5.9 Statements of Common Ground (5.9.2, 5.9.6) 6.11 Environmental Statement: Chapter 11 (Historic Environment) 	Amber	The Project will continue to engage with stakeholders on these matters with a view to resolution. The Applicant believes there is an opportunity to resolve the issue.

Appendix A. Stakeholder Responses

Our ref: 24/70021/PPA
Direct Dial: 01376 312769
Ask for: [REDACTED]
Date: 31.07.2025



Simon Pepper
Project Director
National Grid
By email to contact@n-t.nationalgrid.com

Development Management
Causeway House, Braintree,
Essex, CM7 9HB
Tel: 01376 557779
Email: planning@braintree.gov.uk

**PURPOSE OF
LETTER:**

Braintree District Council's (BDC) formal response to National Grid's (NG) Potential Main Issues for Examination (PMIE) to the Norwich to Tilbury electricity network reinforcement project.

Dear Mr Pepper,

Thank you for consulting Braintree District Council (BDC) as a Host Authority on the Norwich to Tilbury Project. This letter is BDC's official comments on the Potential Main Issues for Examination (PMIE) sent to us on 18th July 2025.

1. Introduction

- 1.1. BDC acknowledge that the PMIE is now a pre-application requirement of NSIP applications. BDC understand that this document is designed to be short, covering high level potential issues which will assist informing the Initial Assessment of Principal Issues developed by the Examining Authority, at the start of the examination phase of the DCO process.
- 1.2. BDC have now reviewed the PMIE document prepared by National Grid. Our comments are set out in this letter.
- 1.3. BDC also caveat that this document pre-dates the submission of the DCO which will be accompanied by the plans and environmental statement. BDC therefore reserve the right to add to this list of issues should the need arise, following a detailed assessment of the submission documents.

2. Additional 'Main Issues' for Consideration

- 2.1. BDC consider that there are key main issues missing from the PMIE list presented by National Grid; namely, the adequacy of the DCO and the associated outline management plans, as well as general detailed topic specific considerations such as design, landscape impact, impacts during construction and skills.

- 2.2. While some of these topics may be covered to some degree in other main issue boxes, BDC do not consider that they are broad enough to capture the key discussions that are needed around these topics across the entire route, and specifically within Braintree District.
- 2.3. Specifically with regard to the DCO and adequacy of associated management plans, this is a particular point of contention on the Discharge of Requirements for the Bramford to Twinstead project, that a lot of the outline plans are not fit for purpose (not suitably detailed to achieve desired outcomes), meaning that the detailed submissions at the Discharge of Requirement stage are not sufficiently robust to enable a full understanding of the impacts and how this would be mitigated. The requirements of the DCO are linked to this and BDC will be making representations about ensuring that they are fit for purpose.
- 2.4. As part of the discussion regarding the DCO, timescales for decisions on the Discharge of Requirements will need to be agreed. There are likely to be areas of disagreement between the Local Authorities and National Grid on these timescales.
- 2.5. Key aspects like design, landscape impact, noise, skills and linked community benefits will also require discussion as the project will have a significant impact on Braintree as a district and thus it is critical that these matters get discussed alongside suitable mitigation and compensation as required. Notating these points as notwithstanding the principal issue outlined in PM1.
- 2.6. BDC consider that the above additional topics should be 'Amber' in the Red Amber Green (RAG) labelling system on National Grids PMIE table, meaning that they are under discussion but may not get resolved during the examination.

3. PMI 1 - Offshore Alternative Route

- 3.1. BDC agree that this entry should be red on the RAG system.
- 3.2. BDC consider however that it should be broadened out to not just off-shore options, but other potential options with less environmental effects as detailed in the ESO's East Anglia Network Study dated March 2024. In addition, there is a perception that the chosen route was pre-determined, with alternatives not given sufficient consideration until much later after the first non-statutory engagement with Host Authorities – but at this stage the project was already developed to automatically discount other options, hence the perception of pre-determination.
- 3.3. Notwithstanding any potential Gunning principle issues (which BDC haven't formally commented on), it is still considered that PMI 1 should be expanded to include the above issues (alternative routes and pre-determination).

4. PMI 3 – Routing Alternatives

- 4.1. BDC were unclear what this PMI was referring to; whether it be a general point about the use of pylons instead of undergrounding, or specifically those Council's which have put forward alternative routes to the alignment proposed at the targeted consultation stage. Clarity is needed.

5. PMI 4 – Impacts on Third Party Developments

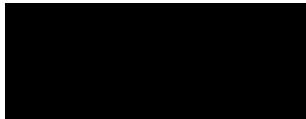
- 5.1. This should be broadened out to not only development, but third parties which are affected by the scheme more generally – this could be residential properties, businesses etc. If this is expanded to cover more general neighbour impacts, Braintree District Council should be listed as an affected stakeholder in PMI 4.

6. PMI 7 – Interactions with other DCO's

- 6.1. This should include other NSIP's in the area including Bramford to Twinstead.

7. Summary

- 7.1. BDC consider that the PMIE document requires further refinement prior to submission to the Planning Inspectorate. It also needs issues adding as per the letter above.
- 7.2. I trust this sets out BDC's comments on the PMIE but should any further clarifications be needed, please do not hesitate to contact me.
- 7.3. Yours faithfully,



Principal Planner
For Head of Planning

Subject: [EXTERNAL] RE: Norwich to Tilbury - Potential Main Issues for Examination
Sent: 7/31/2025, 11:46:19
From: [REDACTED]@baberghmidsuffolk.gov.uk>
To: Jonathan Binks
Cc: [REDACTED]

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Hi Jonathan,

I am emailing further to Catrin's email below and Simon's letter that was attached.

I have reviewed the PMIE and have the following comments from BMSDC:

- I don't believe we have seen the issues tracker that has been used to inform the PMIE list. It would be helpful to see this please.
- PMI 2: The proposed substation in Tendring has the potential to impact the setting of designated and non-designated heritage assets. It is expected that HIAs and mitigation proposals will be presented in the Environmental Statement. However, Grid have not yet responded to comments regarding NDHAs and none appear to have been identified or assessed. BDC expects there will be landscape and visual (including setting of NL) matters relevant to this issue. Please confirm.
- PMI 3: The proposed route has the potential to impact designated and non-designated heritage assets. It is expected that HIAs and mitigation proposals will be presented in the Environmental Statement. MSDC expect discussion of the Waveney Valley section. BMSDC expect this matter to include consideration of ecology, heritage, landscape and visual, noise, vibration and other environmental impacts.
- PMI4: No comment
- PMI5: BDC expect to see appropriate resolution of matters relating to Reydon airfield previously identified.
- PMI 6: The construction access route has the potential to impact designated and non-designated heritage assets. It is expected that HIAs and mitigation proposals will be presented in the Environmental Statement. An Amber RAG score should be attributed to this as is the case with PMI 3. BMSDC expect this matter to include consideration of ecology, heritage, landscape and visual, noise, vibration and other environmental impacts.
- PMI7: BMSDC consider other projects that should be considered include Bramford to Twinsted, North Falls, Five Estuaries and Tarchon (now in the published NISTA pipeline). There should be a similar joint design approach for the EACN and other onshore infrastructure as well as coordination of s85 duty furthering the purpose outcomes and, for B2T, coordination of delivery effects.
- PMI8: No comments

As some technical colleagues are on leave at the moment, BMSDC may have further comments to make on the PMIE list and I will send those on as soon as I have them.

Kind regards,

[REDACTED]

[REDACTED]

Principal Planning Officer (NSIP and energy lead) - Development Management **** Mondays, Tuesdays, Wednesdays and Thursdays only ****

Sustainable Communities

Mid Suffolk and Babergh District Councils - Working Together

Pronouns: [REDACTED] ([Why is this here](#))

Telephone: 07798522734 or 0300 1234000 option 5 then option 3 for Planning

For general enquiries email: planningadmin@midsuffolk.gov.uk

Websites: www.babergh.gov.uk or www.midsuffolk.gov.uk

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IMPORTANT PLEASE READ

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From: Catrin Owen [REDACTED]@nationalgrid.com>

Sent: 18 July 2025 12:25

To: [REDACTED]@norfolk.gov.uk>; [REDACTED]@norfolk.gov.uk>; [REDACTED]@southnorfolkandbroadland.gov.uk>; [REDACTED]@southnorfolkandbroadland.gov.uk>; [REDACTED]@baberghmidsuffolk.gov.uk>; [REDACTED]@baberghmidsuffolk.gov.uk>; [REDACTED]@baberghmidsuffolk.gov.uk>; [REDACTED]@suffolk.gov.uk>; [REDACTED]@suffolk.gov.uk>; [REDACTED]@tendringdc.gov.uk>; [REDACTED]@suffolkandessex-nl.org.uk>; [REDACTED]@colchester.gov.uk>; [REDACTED]@colchester.gov.uk>; [REDACTED]@colchester.gov.uk>; [REDACTED]@braintree.gov.uk>; [REDACTED]@chelmsford.gov.uk>; [REDACTED]@brentwood.gov.uk>; [REDACTED]@brentwood.gov.uk>; [REDACTED]@basildon.gov.uk>; [REDACTED] - Principal Planning Officer (National Infrastructure) [REDACTED]@essex.gov.uk>; [REDACTED] - Principal Planning Officer (National Infrastructure) [REDACTED]@essex.gov.uk>; [REDACTED] - Project Manager [REDACTED]@essex.gov.uk>; [REDACTED]@thurrock.gov.uk>; [REDACTED]@thurrock.gov.uk>; [REDACTED]@thurrock.gov.uk>

Cc: Lucy Cook [REDACTED]@nationalgrid.com>; Simon Pepper [REDACTED]@nationalgrid.com>; Donna Burnell <[REDACTED]@nationalgrid.com>; Jonathan Binks <[REDACTED]@nationalgrid.com>

Subject: Norwich to Tilbury - Potential Main Issues for Examination

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Dear All,

I hope you are all well. As mentioned to those I have spoken to in regular catch-up calls this week, please find attached an explanation of the draft potential main issues for examination (PMIE) document, and the draft document itself. I appreciate everyone is extremely busy, but if you are able to get back to us by 1st August we would really appreciate it.

As ever, if you have any questions or want to discuss it further then please do get in touch myself, Lucy or for the PMIE also our colleague Jonathan Binks, copied in.

Best regards,
Catrin

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Subject: FW: [EXTERNAL] PMIE comments
Sent: 8/1/2025, 11:31:17
From: Lucy Cook
To: Jonathan Binks

From: [REDACTED] <[REDACTED]@colchester.gov.uk>
Sent: 01 August 2025 16:30
To: Lucy Cook <[REDACTED]@nationalgrid.com>; Catrin Owen <[REDACTED]@nationalgrid.com>
Cc: [REDACTED] <[REDACTED]@colchester.gov.uk>
Subject: [EXTERNAL] PMIE comments

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Hi Catrin and Lucy,

Thanks for sharing the PMIE document with us. In addition to the points I raised about the needs case (in relation to the timing of the project and whether it could be delivered a few years later for improved sustainability benefits), we would like to raise a few additional issues:

- **For PMI 3 I think Colchester should be included** within this as we still want to request the undergrounding of other parts of the powerline along the route. For instance from the EACN to Great Horkesley and West Bergholt to Marks Tey to be undergrounded (for impact on landscape).
- **Additional PMI for the Impact of the proposal on the national landscape** - This is still an ongoing issue and I know National Grid have been developing proposals for how to mitigate the impact on the national landscape through financial contributions. But aware that because of the change in Government policy in relation to 'furthering the purpose' of the national landscape then this should be reflected. We suggest this is Amber on the RAG rating.
- **Additional PMI on Landscape and visual impacts** - As I raised on Monday, the impact of the project on landscape will be one of the largest impacts and issues associated with the project (obviously this overlaps partly with PMI 3). There are obviously other impacts which could be listed here as well (e.g. Noise) but we feel landscape is one of the main ones, and will likely be a key subject of discussion. We suggest this is Amber on the RAG rating
- **Additional PMI on Social Value and community benefits** - We note this has not been suitably addressed by National Grid so far, despite the need for these to be identified particularly in relation to jobs and skills creation. We suggest this is Amber on the RAG rating
- **Additional PMI on compensation to be agreed** - Government has produced written guidance on how residents could be compensated for the delivery of the pipeline but we believe this is yet to be addressed sufficiently to date. We suggest this is Amber on the RAG rating.

I'm aware that ECC are also co-ordinating a response on behalf of some of the LAs to this as well.

Thanks,

[REDACTED]
Senior Planning Policy Officer
Colchester City Council
[REDACTED]



Colchester
City Council



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Subject: Potential Main Issues for Examination - TDC response
Sent: 8/20/2025, 08:13:21
From: Jonathan Binks
To: Jonathan Binks

From: [REDACTED]@tendringdc.gov.uk>
Sent: 01 August 2025 12:52
To: Catrin Owen [REDACTED]@nationalgrid.com>
Cc: Lucy Cook [REDACTED]@nationalgrid.com>; Simon Pepper [REDACTED]@nationalgrid.com>
Subject: [EXTERNAL] RE: Norwich to Tilbury - Potential Main Issues for Examination - TDC response

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Response from Tendring District Council (TDC) on National Grids' Draft Potential Matters for Initial Examination (PMIE)

Thank you for consulting Tendring District Council on the draft PMIE prepared by National Grid. This document, now a key pre-application requirement under the Nationally Significant Infrastructure Project (NSIP) regime, should ideally aim to provide a concise and well informed summary of headline matters that will inform the Initial Assessment of Principal Issues by the Examining Authority at the start of the Development Consent Order (DCO) examination phase.

TDC have worked collaboratively with Essex County Council (ECC) and other affected local authorities to review the draft PMIE. Our comments are set out below and in the enclosed stakeholder table. While we appreciate the opportunity to contribute at this stage, it must be acknowledged that significant elements of the proposed DCO remain undeveloped and have not yet undergone full pre-application engagement. Accordingly, TDC reserve the right to revise and expand upon these issues once the final DCO, environmental statement, and associated plans are made available for detailed assessment.

Key Areas of Concern Not Captured in the PMIE

TDC considers that several important headline matters are not adequately addressed in the current draft PMIE and should be added to ensure proper consideration during the examination phase:

1. Cumulative / In combination effects, Design, Landscape and Visual Impact

- While touched upon in some PMIE entries, further thematic breadth is needed to cover the full spatial and environmental implications across all districts, but specifically the Tendring Peninsula which will see dramatic changes. The cumulative landscape impact must be thoroughly explored and this should be a Main Issue for examination.

2. Noise / Vibration and Amenity Impacts

- There will be wide ranging disruption to residential areas and communities. These impacts must be considered both during construction and operation phases, with mitigation strategies clearly outlined. We are concerned that this is not indicated to be a main issue

3. Community Compensation and Social Value

- Issues around local employment, skills, training and long-term socio-economic benefits are integral to community support and must be formally embedded in the PMIE framework.

4. Agricultural Land Use (TDC-Specific)

- TDC highlight significant concerns regarding the impacts on best and most versatile (BMV) agricultural land and other countryside uses. These are considered strategic headline matters due to their scale and cumulative effects across the district.

These themes directly affect local communities and must be addressed with appropriate mitigation and compensation measures. TDC also recommend that topics such as PMI 2; 3; 6 and 7 be classified as RED within National Grid's RAG system—classifying them as amber or green, as per the current indication, is underplaying, by a considerable margin, the seriousness and complexity of these issues. These items to our mind are live / ongoing discussions and items that may remain unresolved at the conclusion of the examination.

More Detailed Comments on Existing PMIs

- **PMI 1 – Offshore Route Alternatives**
 - The current classification of 'Red' is supported, but the entry should be expanded to consider all alternative routes, including lower-impact options identified in the East Anglia Network Study (March 2024). TDC's position remains that the preferred route was pre-determined early in the engagement process, potentially undermining the credibility of alternative analysis.
- **PMI 2 – East Anglian Connection Node location –**

This is a very important matter for TDC and its affected communities and the RAG status should be RED
- **PMI 3 – Routing Alternatives**
 - Clarity is urgently needed regarding the scope of this PMI—whether it covers the pylon-vs-undergrounding debate, or whether it refers to alignment alternatives proposed by local authorities during targeted consultations.
- **PMI 4 – Impacts on Third Party Developments**
 - N2T will affect third party developments in TDC area. This should also be widened to cover general neighbour impacts, including residential, commercial, and other community stakeholders. TDC should be listed as directly affected stakeholders under this PMI.
- **PMI 7 – Interactions with Other DCOs**
 - The PMI should reflect interactions with other ongoing and overlapping NSIPs, including Bramford to Twinstead (BDC), North Falls, Five Estuaries, and Tarchon (TDC).

Conclusion

Tendring District Council consider that the PMIE requires further refinement prior to submission to the Planning Inspectorate. Additional issues should be incorporated, and existing matters clarified and expanded upon to ensure that the full spectrum of community, environmental, and procedural concerns are addressed transparently and with the appropriate level of scrutiny.

We remain committed to continuing dialogue with National Grid and relevant parties to support a balanced and thorough examination of the proposed scheme. Should further clarification be required, please do not hesitate to contact us.

Kind Regards,

[Redacted Signature]

Planning Policy Officer

Tel: [Redacted]

Email: [Redacted]@tendringdc.gov.uk

Normally based at Town Hall, Station Road, Clacton-on-Sea, Essex, CO15 1SE

[Tendring Map Access Portal \(arcgis.com\)](#)

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This email contains informal professional opinions, unless explicitly stated otherwise, and is provided without prejudice to any future decisions or actions by the Council. For clarification on the content's status, please consult the email's author. Kindly be aware that any personal information enclosed adheres to Tendring Council's Data Protection policies and the provisions of the Data Protection Act, accessible on the Council's website. In our commitment to fostering inclusivity and aligning with the principles of the Equality Act, we encourage open dialogue. If any part of this email unintentionally implies a gender identity incongruent with your own or is

perceived as unhelpful to protected characteristics, please inform us. Your feedback is invaluable, and we are dedicated to promptly rectifying any oversights in our future communications. Thank you for your understanding.

Date: 6 August 2025
Department: Planning Strategy & Implementation Team
Tel. No: 01268 533333 (Option 5)
E-mail: planningpolicy@basildon.gov.uk

Sent via email to:
Simon Pepper
Project Director
National Grid
contact@n-t.nationalgrid.com

Dear Mr Pepper,

RE: Basildon Council's Formal Response to National Grid's Potential Main Issues for Examination (PMIE) of the Norwich to Tilbury Project

Dear Mr Pepper,

Thank you for consulting Basildon Borough Council (the Council) on 18 July 2025 with regards to the Potential Main Issues for Examination (PMIE) of the Norwich to Tilbury project. Please accept this letter as Basildon Borough Council's formal response to the PMIE document. The Council has the following observations to make:

1. Introduction

- 1.1. The Council acknowledges that PMIE is now a pre-application requirement for all Nationally Significant Infrastructure Projects (NSIP). These documents are intended to offer a high-level overview of the likely potential issues, and to assist the Initial Assessment of Principal Issues developed by the Examining Authority at the start of the examination phase of the DCO process.
- 1.2. The Council has reviewed the PMIE document prepared by National Grid. However, it should be noted that this document pre-dates the submission of the DCO which will be accompanied by the plans and environmental statement. The Council subsequently reserves the right to add to this list of issues once there is an opportunity to fully review and assess the documents which accompany the DCO submission.

2. Additional matters for consideration through the PMIE

- 2.1. The Council considers there are several omissions from the PMIE list as it stands. These include matters such as the adequacy of the DCO and the associated outline management plans, in addition to general detailed topic specific considerations such as design, landscape impact.

- 2.2. There is no overview or assessment of any likely impacts during construction, plus despite LPAs asking repeatedly for the information, there is no information on social value and local benefits, including job creation.
- 2.3. Although some of these topics may be addressed in documents which are still to be produced, clarity will be needed as to the local benefits for Basildon borough. Other affected LPAs may share this sentiment in respect of their own areas. National Grid have also been made aware of Essex County Council's [Nationally significant infrastructure projects policy](#).
- 2.4. Unlike a traditional planning application, for Discharge of Requirements (DoR) no site notices are posted, as there is no formal duty for members of the public or householders to be consulted in the DoR part of the National Significant Infrastructure Project (NSIP) process. The DCO sets out who the compulsory statutory consultees are for each requirement, for example the Environment Agency. As part of the ongoing discussions regarding the DCO, timescales for decisions on the Discharge of Requirements will therefore need to be agreed. This may be a point of contention and area of disagreement between the host authorities and National Grid.
- 2.5. Key aspects like design, landscape impact, noise, skills and linked community benefits will also require discussion as the project will have a significant impact on, particularly in the west of the Borough closest to the route. These issues must be discussed alongside suitable mitigation and compensation as required. It is noted, for example, that the overhead pylons are likely to have an effect on land values and property prices from new build development, which could reduce the funding available for infrastructure which will be secured under Section 106 agreements from future development. Work commissioned by ECC on the viability of Dunton Hills Garden Village confirms this impact on pricing.
- 2.6. The above topics should be 'Amber' in the Red Amber Green (RAG) labelling system on National Grid's PMIE table, meaning that they are under discussion but may not get resolved during the examination.

3. PMI 1 - Offshore Alternative Route

- 3.1. The Council's view is that this should be 'red' on the RAG system. PMI 1 should also be broadened out to include not just off-shore options, but other potential options with less environmental effects, as detailed in the ESO's East Anglia Network Study dated March 2024.
- 3.2. The perception remains that National Grid's preferred route was pre-determined, as alternatives were not given sufficient consideration until after the first non-statutory consultation period was held in 2022. However, by that stage the project was already developed to automatically discount other options, hence the perception of pre-determination. It is assumed this could be discussed

under this heading if not resolved through the submission of the Consultation Report.

- 3.3. Notwithstanding any potential contravention of the Gunning principles through this approach (a matter which may need to be discussed through the hearings; it is noted that some pressure groups commissioned legal advice from Lord Banner KC on this matter), the Council's view is that PMI 1 should be expanded to cover the above issues of alternative route options and pre-determination.

4. PMI 3 – Routing Alternatives

- 4.1. It is unclear what is meant by this. Further clarity is needed over whether this is a general point about the use of pylons instead of undergrounding, or if this relates to Councils which suggested alternative routes to the preferred alignment during consultation.

5. PMI 4 – Impacts on Third Party Developments

- 5.1. It is assumed that any effects on Dunton Hills Garden Village, just across the borough boundary in Brentwood, would be covered under this heading given that both Brentwood and Basildon Councils raised concerns about the viability of consented development and site allocations arising from the use of overhead pylons.
- 5.2. It is also assumed given the wider housing need across the County, that concerns regarding the impact on other proposed future strategic development sites identified in current and emerging local plans, can be raised under this heading. It is also considered that this heading should be broadened out to cover Designated Assets and Protected Landscapes i.e. Impacts on Third Party Developments, Designated Assets and Protected Landscapes.

6. PMI 7 – Interactions with other DCO's

- 6.1. This should include other NSIP's in the area including Bramford to Twinstead. It is considered that interactions with other DCO's goes beyond Lower Thames Crossing. This section could also generally refer to the other routes which National Grid are proposing to develop under "The Great Grid Upgrade", given that 17 routes are proposed in total by 2050, all using overhead pylons as the default option, and so how Norwich to Tilbury is treated and assessed may be used as a precedent for forthcoming projects.

7. PMI 8 – Statutory Undertakers and Third Parties

- 7.1. Under this section, the British Pipeline Agency (BPA) has flagged a range of concerns and are particularly concerned about the risk of corrosion and electromagnetic frequency between overhead pylons and existing underground piping just outside of the Basildon borough boundary to the south of Dunton Hills Garden Village.
- 7.2. The BPA's perspective is that the necessary mitigation to address the safety concerns cannot be accommodated within the current Order limits. This is also a concern for Basildon borough given the ongoing tri-borough Growth bid which involves joint working between Thurrock, Basildon and Brentwood Councils and Homes England to deliver new housing in the far west of Basildon borough and the Dunton Hills, West Horndon in Brentwood and Lower Langdon in Thurrock, particularly given that viability will reduce.
- 7.3. Should any temporary construction be necessary, e.g. for worker accommodation, interplay with matters such as water consumption will also be of relevance. It should be noted that there is a shortage of available capacity in local water treatment plants, and this issue is affecting the determination of planning applications and remains the subject of ongoing live discussions between the Council and Anglian Water.

As such, the Council considers that the PMIE document requires further refinement prior to its submission to the Planning Inspectorate in order to address the points highlighted in this letter.

If any further clarifications are needed, please do not hesitate to contact the team using the email address planningpolicy@basildon.gov.uk

Yours sincerely,



For Basildon Borough Council

National Grid Electricity Transmission

c/o Jonathan Binks / Catrin Owen

Response sent via email:

██████████@nationalgrid.com

██████████@nationalgrid.com

Our Ref: N2T.PMIE
Date: 5 August 2025
Telephone: 03330 139505

Dear Simon,

Planning Act 2008 (as amended) – Section 55 (4)

Norwich to Tilbury Project Proposals by National Grid Electricity Transmission

Comments on Draft Potential Main Issues for Examination (PMIE)

I refer to your letter of 17th July 2025. Thank you for consulting Essex County Council (ECC) on the draft PMIE you have prepared for future submission to the Planning Inspectorate.

ECC note that the PMIE is now a pre-application requirement of NSIP applications which will assist informing the Initial Assessment of Principal Issues developed by the Examining Authority.

It is also noted that the document pre-dates the submission of the application for the Development Consent Order (DCO) later in the month which will be accompanied by the plans and environmental statement to support the proposal.

ECC has worked collaboratively with Basildon, Braintree, Brentwood, Chelmsford, Colchester and Tendring to review this draft document with the intention of coordinating our assessment and comments. However, ECC reserve the right to add to this list of issues or request changes to the RAG rating should the need arise, following a detailed assessment of the submission documents.

Comments on the Identified ‘Main Issues’ for Consideration

PMI 1 - Offshore Alternative Route

NGET’s position is noted but in addition, there is a perception that the chosen route was pre-determined, with alternatives not given sufficient consideration until much later after the first non-statutory engagement with Host Authorities, creating the circumstances for the concerns regarding the ‘Gunning principles’. It is assumed this could be discussed under this heading if not resolved through the submission of the Consultation Report.

It is also considered that it will be important for other potential options not just the offshore options, with less environmental effects as detailed in the ESO’s East Anglia Network Study dated March 2024

RAG: No change to this RAG status (RED) is requested but it is questioned whether PM1 should be broadened to include these issues and reflected within the description of the 'Potential Main Issue'.

PM2 – East Anglian Connection Node (EACN)

It is assumed that in addition to the justification of options for the location of the EACN and the cumulative in combination effects of multiple infrastructure developments on the Tendring peninsula, the issue of design and the potential effects on amenity through noise could also be discussed under this heading alongside the impact on landscape, designated / non designated heritage assets, ecology and traffic.

RAG: No change to this RAG status (AMBER) is requested but the issue remains a concern especially in the absence of any details for strategic and / or coordinated mitigation.

PMI 3 – Routing Alternatives

It is unclear whether this heading relates to concerns arising from the actual routing of the proposed N2T alignment or to concerns about the use of pylons instead of undergrounding. It would be appreciated if this could be clarified. In any event it is considered that Tendring should be added to the list of 'Affected Stakeholders'.

RAG: No change to this RAG status (AMBER) is requested although it must be acknowledged that final detail and associated mitigation much of which has not been previously submitted as part of the per application process, will be submitted a part of the ES and assessed at that time.

PMI 4 – Impacts on Third Party Developments

It is assumed the effect on DHGV would be covered under this heading and it must be noted that on 29th July, Brentwood Borough Council's Planning Committee approved the terms of the obligations within the required legal agreement and will shortly issue the planning permission for this development. It is also assumed given the housing need across the County, that concerns regarding the impact on other proposed future strategic development sites identified in current and emerging local plans, can be raised under this heading.

It is also contended that this heading should be broadened out to cover Designated Assets and Protected Landscapes i.e. Impacts on Third Party Developments, Designated Assets and Protected Landscapes and possibly residential / commercial properties and business if not covered elsewhere in this list of potential main issues for examination.

RAG: Due to ongoing discussions especially around the effect on DHGV, no change to this RAG status (AMBER) is requested at this stage.

PMI5 – Airfields

It is questioned whether SCC and ECC should be listed alongside the CAA as an 'Affected Stakeholder'. ECC has raised the potential implications for the operation of local airfields in its consultation responses and although it is understood, the proposed routing and OHL will not have any significant effect on their operation, no confirmation of this position has been provided. ECC is also aware of discussions on this topic from SCC but would refer to SCC for commentary on this.

RAG: No change to this RAG status (GREEN) is requested at this stage.

PMI6 – Construction Access Approach and Route Selection

It is assumed that PMI6 would cover any of ECC's Highway and Transport concerns as well our ongoing discussions regarding the acceptability of a potential alternative construction access. It is also considered that many of the matters discussed in the thematic group meetings (PMI3) including designated and non-designated heritage assets, archaeology, ecology & landscape, have the potential to impact on acceptability under this heading and could also be captured here.

RAG: Based on the information presently available and the issues currently being discussed, while it is envisaged that some if not all of the discussion points will be resolved, it is considered this topic should be raised to AMBER in acknowledgement of the fact that complete agreement may not be reached. AMBER meaning that they are under discussion but may not get resolved during the examination.

PMI7 – Interactions with Other DCO's

It is considered that interactions with other DCO's goes beyond Lower Thames Crossing. This section should therefore refer to Five Estuaries, North Falls, Sea Link, Tarchon, Bramford to Twinstead and Longfield Solar Farm.

RAG: Based on the current level of information available, the dependant nature of Five Estuaries and North Falls on N2T and the potential cumulative impacts, it is considered this topic should be raised to AMBER. AMBER meaning that they are under discussion but may not get resolved during the examination

PMI8 – Statutory Undertakers & Third Parties.

We have been made aware of significant safety concerns that are being raised by the British Pipeline Agency in respect of the interaction between their pipeline and the route of the OHL, south of DHGV. It is understood it is their opinion that the mitigation necessary to address safety concerns cannot be accommodated within the current Order limits. BPA have also made us aware of a perceived lack of response to their representations which could raise concerns over the Adequacy of Consultation.

RAG: Based on the nature of this concern and the advised resolution, it is considered this topic should be raised to AMBER pending more information on discussions / resolution are available. AMBER meaning that they are under discussion but may not get resolved during the examination.

Additional 'Main Issues' for Consideration

While some of these topics listed below may be covered to some degree by those already mentioned, it is considered there are several relevant 'headline' issues for examination not captured by the as drafted PMIE or are considered not broad enough to capture the key discussions that are needed around these topics across the entire route.

It is therefore considered these should be included so that they are highlighted as potential main issues for discussion

1) DCO / Requirements + Outline Management Plans

The drafting, content and finalisation of the DCO and Requirements, alongside the adequacy of management plans is considered critical to consideration of the proposal, should the DCO be granted. Timescales for decisions on the Discharge of Requirements will need to be agreed and there are likely to be areas of disagreement between the Local Authorities and National Grid on these timescales as well as the drafting of Requirements

2) Design / Landscape Visual Impact

This needs to cover the full spatial and environmental implications along the length of the proposed route, but in particular, the Tendring Peninsula which will see dramatic changes. The cumulative landscape impact must be thoroughly explored alongside the potential for significant landscape effects on the National Landscape to inform any proposed mitigation / compensation

3) Noise / Impacts on Amenity

There will be wide ranging disruption to residential areas and communities. These impacts must be considered both during construction and operation phases, with mitigation strategies clearly outlined. We are concerned that this is not indicated to be a main issue

4) Community Compensation

It is considered due to the potential of the development to impact on local communities, the issue of community mitigation and compensation is key and should include social value and issues around local employment, skills, training and long-term socio-economic benefits alongside other community enhancements.

I trust these interim comments are of assistance, but should any further clarification be required, please do not hesitate to contact me.

We look forward to working with you as the project progresses to resolve our comments and hopefully, where possible, reach agreement.

Yours sincerely,



Principal Planning Officer

On behalf of Graham Thomas

Head of Planning & Sustainable Development

National Grid

Planning and Development Management
P.O. Box 7544, Civic Centre,
Duke Street, Chelmsford,
Essex, CM1 1XP

Your ref:
My ref: 24/00001/NSIP
Telephone: 01245 606826
Date: 5th August 2025

Dear Mr Pepper

Application by National Grid for an Order Granting Development Consent for the Norwich to Tilbury Pylon Proposal

Thank you for consulting Chelmsford City Council (CCC) on the potential Main Issues for Examination (PMIE) dated 18th July 2025.

CCC note that the PMIE is now a pre-application requirement of NSIP applications which will assist informing the Initial Assessment of Principal Issues developed by the Examining Authority (ExA). We note that the document pre-dates the submission of the Development Consent Order (DCO) which will be accompanied by the plans and environmental statement. We reserve the right to add to this list of issues should the need arise, following a detailed assessment of the submission documents.

Additional 'Main Issues' for Consideration

We consider that there are key main issues missing from the PMIE list presented by National Grid; namely the adequacy of the Development Consent Order (DCO) and the associated outline management plans, as well as general detailed topic specific considerations such as design, heritage, landscape impacts and impacts during construction and skills.

While some of these topics may be covered to some degree, we do not consider that they are broad enough to capture the key discussions that are needed around these topics across the entire route, and specifically within Chelmsford.

Within Chelmsford Administrative Area, the effect on Great Waltham and Little Waltham is a main issue for consideration and should be flagged to ExA.

The drafting, content and finalisation of the Requirements and adequacy of management plans is considered critical to consideration of the proposal, should the DCO be granted. Procedures, including those related to the Timescales for decisions on the Discharge of Requirements, will need to be agreed as there are likely to be areas of disagreement between the Local Authorities and National Grid on these timescales.

Matters including design, landscape impact, noise, skills and linked community benefits will require discussion alongside suitable mitigation and compensation as required.

These topics should be 'Amber' in the Red Amber Green (RAG) labelling system on National Grids PMIE table, meaning that they are under discussion but may not get resolved during the examination.

PMI 1 - Offshore Alternative Route

We agree that this entry should be red on the RAG system.

The section should be expanded to include alternative routes and pre-determination. The entry should include other potential options with less environmental effects as detailed in the ESO's East Anglia Network Study dated March 2024.

There is a perception that the chosen route was pre-determined, with alternatives not given sufficient consideration until much later after the first non-statutory engagement with Host Authorities – but at this stage the project was already developed to automatically discount other options, hence the perception of pre-determination and concern regarding the Gunning principles, which we have not commented on.

PM2 – East Anglian Connection Node (EACN)

This is not a main issue for CCC. Please remove CCC from the consideration.

PMI 3 – Routing Alternatives

It's unclear what this PMI was referring to? Is it a general point about the use of pylons instead of undergrounding, or specifically those Council's which have put forward alternative routes to the alignment proposed at the targeted consultation stage. Please clarify.

PMI 4 – Impacts on Third Party Developments

This should be broadened out to not only development, but third parties which are affected by the scheme. It should also be expanded to cover more general neighbour impacts. Chelmsford City Council should be listed as an affected stakeholder in PMI 4.

PMI 7 – Interactions with other DCO's

This should include other NSIP's in the area including Longfield Solar Farm which is under discharge of requirement.

Conclusion

The PMIE document requires further refinement prior to submission to the Planning Inspectorate. It also needs issues added as set out above.

Should you have any further clarifications be needed, please do not hesitate to contact me.

Yours sincerely,



Senior Planning Officer

Subject: FW: [EXTERNAL] RE: Norwich to Tilbury - Potential Main Issues for Examination - BBC response
Sent: 8/7/2025, 05:45:20
From: Lucy Cook
To: Jonathan Binks

From: [REDACTED] <[REDACTED]@brentwood.gov.uk>

Sent: 07 August 2025 10:44

To: Catrin Owen <[REDACTED]@nationalgrid.com>

Cc: Lucy Cook <[REDACTED]@nationalgrid.com>; Simon Pepper <[REDACTED]@nationalgrid.com>; [REDACTED] <[REDACTED]@brentwood.rochford.gov.uk>

Subject: [EXTERNAL] RE: Norwich to Tilbury - Potential Main Issues for Examination - BBC response

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Response from Brentwood Borough Council on National Grids' Draft Potential Matters for Initial Examination (PMIE)

Thank you for consulting Brentwood Borough Council (BBC) as a Host Authority on the Norwich to Tilbury Project. This email is BBC's official comments on the Potential Main Issues for Examination (PMIE) sent to us on 18th July 2025.

BBC acknowledge that the PMIE is now a pre-application requirement of NSIP applications. BBC understand that this document is designed to be short, covering high level potential issues which will assist informing the Initial Assessment of Principal Issues developed by the Examining Authority, at the start of the examination phase of the DCO process.

BBC have worked collaboratively with Essex County Council (ECC) and other affected local authorities to review the draft PMIE prepared by National Grid. Our comments are set out below.

BBC also caveat that this document pre-dates the submission of the DCO which will be accompanied by the plans and environmental statement. BBC therefore reserve the right to add to this list of issues should the need arise, following a detailed assessment of the submission documents.

Comments on Draft Potential Main Issues for Examination (PMIE)

- **PMI 1 – Offshore Route Alternatives**

The current classification of 'Red' is supported. NGET's position is noted but in addition, there is a perception that the chosen route was pre-determined, with alternatives not given sufficient consideration until much later after the first non-statutory engagement with Host Authorities, creating the circumstances for the concerns regarding the 'Gunning principles'. It is assumed this could be discussed under this heading if not resolved through the submission of the Consultation Report

It is also considered that it will be important for other potential options not just the offshore options, with less environmental effects as detailed in the ESO's East Anglia Network Study dated March 2024

- **PMI 3 – Routing Alternatives**

Clarity is urgently needed regarding the scope of this PMI, whether it covers the pylon-vs-undergrounding debate, or whether it refers to alignment alternatives proposed by local authorities during targeted consultations. Once clarity is provided BBC may need to be added to the list of 'Affected Stakeholders'.

- **PMI 4 – Impacts on Third Party Developments**

It is assumed the effect on DHGV would be covered under this heading. It must be noted that on 29th July, BBC's Planning Committee approved the terms of the obligations within the

required legal agreement and will shortly issue the planning permission for this development. It is also assumed given the housing need across the County, that concerns regarding the impact on other proposed future strategic development sites identified in current and emerging local plans, can be raised under this heading.

This PMI should also be widened to cover general neighbour impacts, including residential, commercial, and other community stakeholders.

- PMI 7 – Interactions with Other DCOs

It is considered that interactions with other DCO's goes beyond Lower Thames Crossing. This section should therefore refer to Five Estuaries, North Falls, Sea Link, Tarchon, Bramford to Twinstead and Longfield Solar Farm.

Additional 'Main Issues' for Consideration

BBC considers that several important headline matters are not adequately addressed in the current draft PMIE and should be added to ensure proper consideration during the examination phase:

1. DCO / Requirements + Outline Management Plans

The drafting, content and finalisation of the DCO and Requirements, alongside the adequacy of management plans is considered critical to consideration of the proposal, should the DCO be granted. Timescales for decisions on the Discharge of Requirements will need to be agreed and there are likely to be areas of disagreement between the Local Authorities and National Grid on these timescales as well as the drafting of Requirements

2. Cumulative / In combination effects, Design, Landscape and Visual Impact

Further thematic breadth is needed to cover the full spatial and environmental implications across all districts. The cumulative landscape impact must be thoroughly explored and this should be a Main Issue for examination.

3. Community Compensation and Social Value

It is considered due to the potential of the development to impact on local communities, the issue of community mitigation and compensation is key and should include social value and issues around local employment, skills, training and long-term socio-economic benefits alongside other community enhancements.

4. Noise / Vibration and Amenity Impacts

There will be wide ranging disruption to residential areas and communities. These impacts must be considered both during construction and operation phases, with mitigation strategies clearly outlined. We are concerned that this is not indicated to be a main issue.

Summary

BBC consider that the PMIE document requires further refinement prior to submission to the Planning Inspectorate. It also needs issues adding as per the above.

I trust this sets out BBC's comments on the PMIE but should any further clarifications be needed, please do not hesitate to contact me.

Best wishes

[Redacted]
Senior Policy Planner
Brentwood Borough Council

T: [Redacted]
[Redacted]@brentwood.gov.uk
www.brentwood.gov.uk

From: Catrin Owen [Redacted]@nationalgrid.com>

Sent: 18 July 2025 12:25

Subject: Norwich to Tilbury - Potential Main Issues for Examination

Use Caution: This email originated from outside of the organisation. **Do not** click links or open attachments *unless* you recognise the sender *and* you are confident the content is safe. If you are in *any* doubt please contact the IT Service Desk.

Dear All,

I hope you are all well. As mentioned to those I have spoken to in regular catch-up calls this week, please find attached an explanation of the draft potential main issues for examination (PMIE) document, and the draft document itself. I appreciate everyone is extremely busy, but if you are able to get back to us by 1st August we would really appreciate it.

As ever, if you have any questions or want to discuss it further then please do get in touch myself, Lucy or for the PMIE also our colleague Jonathan Binks, copied in.

Best regards,
Catrin

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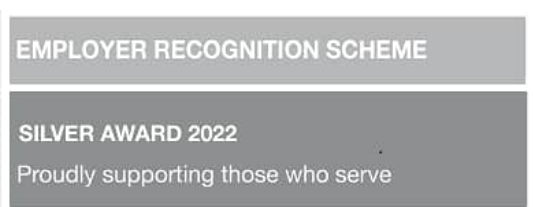
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Thurrock Council Response

Potential Main Issues for Examination

Ref	Description of issue	Affected stakeholder(s)	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
PMI 1	Offshore Alternative Route: Objection to the current 400kv overhead power line. Desire for an offshore option, or where this proves undeliverable then support given to an underground cable route.	Basildon Braintree Brentwood Chelmsford Colchester Essex CC Norfolk CC South Norfolk Suffolk CC Tendring Thurrock	SoCG	Red	The applicant has assessed an equivalent offshore option. To deliver the same capacity as the overhead line, three subsea cables and associated onshore infrastructure would need to be built.

PMI 2	East Anglian Connection Node (EACN): substation location and cumulative effects.	Tendring Colchester Chelmsford Essex CC	SoCG	Amber	The applicant has considered a number of alternative sites for the EACN. The applicant's proposed location remains the preferred site based on all assessments.
PMI 3	Routeing Alternatives Routeing and use of Overhead lines rather than undergrounding cables	Norfolk CC Suffolk CC Babergh Mid-Suffolk Essex CC Chelmsford <u>Thurrock</u>	SoCG	Amber	Further discussion around assessments and mitigation have been discussed in the appropriate thematic group meetings and will be presented in the Environmental Statement.
PMI 4	Impacts on Third Party Developments	Essex CC Brentwood Basildon Thurrock	<u>SoCG</u>	Amber	The applicant has taken into account the potential effect of its proposals when developing the route alignment.
PMI 5	Airfields Impacts on civil aerodrome sites	Civil Aviation Authority	<u>SoCG</u>	Green	The applicant's assessment concludes that aviation operations can continue at the airfields, with 'no' or 'relatively

					small' adjustments, or proposed compensation in one instance.
PMI 6	<p>Construction Access Approach and Route Selection</p> <p>The proposed approach for project construction access, and specific route on the local road networks.</p>	<p>Norfolk CC</p> <p>Suffolk CC</p> <p>Essex CC</p> <p>Thurrock</p> <p>National Highways</p> <p>-</p>	SoCG	<p>Green</p> <p>Amber</p>	<p>The project will continue to discuss construction access approach and route selection with stakeholders. The applicant expects this issue is likely to be largely resolved by submission.</p> <p><u>Thurrock comment: significant concerns remain around the level of traffic – particularly, HGV traffic – generated by the project, especially in conjunction with the Lower Thames Crossing.-</u></p>
PMI 7	<p>Interactions with other DCO²s - Lower Thames Crossing (LTC)</p>	<p>National Highways</p> <p><u>Thurrock</u></p>	SoCG	<p>Green</p> <p>Amber</p>	<p>The applicant is seeking to set up a joint design workshop with LTC with a view to resolving the issues.</p> <p><u>Thurrock comment: the cumulative effects of both projects' construction taking place over the same period will have significant impacts in Thurrock. The council is aware that NG is in discussion with National Highways but has not yet seen evidence that these</u></p>

					<p>cumulative effects will be adequately mitigated.</p> <p>Communication of these cumulative effects to residents, businesses and members via a joint communication and programme plan remains an outstanding issue. - The latter should clearly set out interdependencies to provide the Council comfort that any high-risk matters will be effectively mitigated between all parties concerned.</p>
PMI 8 - - - - - -	Statutory Undertakers & third parties Ongoing discussions to protect third party assets	Network Rail Anglian Water British Pipeline Agency -	APA's & SoCG	Green	The applicant will continue to engage with these organisations prior to examination, with a view of resolving outstanding issues.

<u>New PMI</u>	<u>DCO, Requirements, ES and Outline Management Plans</u> <u>Issues not agreed with the DCO and requirements including traffic regulation and core construction hours; impact assessments and mitigation proposals that have not yet been confirmed or shared with the council.</u>	<u>Thurrock</u>			
<u>New PMI</u>	<u>Community benefit and social value</u> <u>Delivery of social value and long-term benefits for the communities most affected, engagement with the new guidance on community funds for transmission infrastructure.</u>	<u>Thurrock</u>			
<u>New PMI</u>	<u>Design and Landscape and Visual Impacts</u>	<u>Thurrock</u>			

	Outstanding questions about route and mitigation for landscape and visual impacts.				
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Norfolk County Council - Response

Potential Main Issues for Examination

Ref	Description of issue	Affected stakeholder(s)	Signposting (to RAG application evidence)		Likelihood of the issue being resolved during the Examination
PMI 1	<p>Offshore <u>and underground</u> Alternative Routes: Objection to the current 400kv overhead power line. Desire for an offshore option, or where this proves undeliverable then support given to an underground cable route.</p> <p><u>There ought to be reference and discussion around ESO's East Anglia Network Study (March 2024). There needs to be some discussion around the options considered in that Study.</u></p> <p><u>There ought to be specific reference to the Waveney Alternative – identifying this as a topic issue for a cross-boundary hearing (involving</u></p>	<p>Basildon</p> <p>Braintree</p> <p>Brentwood</p> <p>Chelmsford</p> <p>Colchester</p> <p>Essex CC</p> <p>Norfolk CC</p> <p>South Norfolk</p> <p>Suffolk CC</p> <p>Tendring</p>	SoCG	Red	<p>The applicant has assessed an equivalent offshore option. To deliver the same capacity as the overhead line, three subsea cables and associated onshore infrastructure would need to be built.</p> <p><u>Can the undergrounding issues be resolved at Examination e.g. re-examining the Waveney Alternative option?</u></p>

	Norfolk and Suffolk Local Authorities)				
PMI 1 B	<u>Timetable</u> <u>There needs to be a discussion around the delivery timetable as NCC, SCC and ECC commissioned a Report suggesting that the timetable could be put back from 2030 to 2035</u>	Norfolk CC; SCC and ECC			
PMI 2	East Anglian Connection Node (EACN): substation location and cumulative effects.	Tendring Colchester Chelmsford Essex CC	SoCG	Amber	The applicant has considered a number of alternative sites for the EACN. The applicant's proposed location remains the preferred site based on all assessments.
PMI 3	Routeing Alternatives Routeing and use of Overhead lines rather than undergrounding cables <u>This could include discussions around the Waveney Alternative.</u>	Norfolk CC Suffolk CC Babergh Mid-Suffolk Essex CC Chelmsford	SoCG	Amber	Further discussion around assessments and mitigation have been discussed in the appropriate thematic group meetings and will be presented in the Environmental Statement.

PMI 4	Impacts on Third Party Developments	Essex CC Brentwood Basildon Thurrock	SoCG	Amber	The applicant has taken into account the potential effect of its proposals when developing the route alignment.
PMI 5	Airfields Impacts on civil aerodrome sites	Civil Aviation Authority	SoCG	Green	The applicant's assessment concludes that aviation operations can continue at the airfields, with 'no' or 'relatively small' adjustments, or proposed compensation in one instance.
PMI 6	Construction Access Approach and Route Selection The proposed approach for project construction access, and specific route on the local road networks.	Norfolk CC Suffolk CC Essex CC Thurrock National Highways	SoCG	Green	The project will continue to discuss construction access approach and route selection with stakeholders. The applicant expects this issue is likely to be largely resolved by submission.
PMI 7	Interactions with other DCO's - Lower Thames Crossing (LTC)	National Highways	SoCG	Green	The applicant is seeking to set up a joint design workshop with LTC with a view to resolving the issues.
PMI 8	Statutory Undertakers & third parties	Network Rail	APA's & SoCG	Green	The applicant will continue to engage with these organisations prior to

	Ongoing discussions to protect third party assets	Anglian Water British Pipeline Agency			examination, with a view of resolving outstanding issues.
PMI 9	<u>The need to consider opportunities to deliver power locally – discussion around the potential for electricity being fed into the local distribution network (UKPN) in order to facilitate / contribute towards local housing and employment delivery</u>	<u>Norfolk CC</u>	<u>SoCG</u>		
PMI 10	<u>Compensation – discussion around what NGET will provide by way of</u>	<u>Norfolk CC</u>	<u>SoCG</u>		

	<u>immediate compensation to local residents and businesses.</u>				
<u>PMI 11</u>	<u>Community Benefits</u> <u>Consideration of a voluntary Community Benefits Fund</u>	<u>Norfolk CC</u>	<u>SoCG</u>		
<u>PMI 12</u>	<u>Skills and Employment Strategy (S&ES)</u> <u>Discussion on NGET preparing a S&E Strategy</u>	<u>Norfolk CC</u>	<u>SoCG</u>		

Suffolk County Council - Response

Potential Main Issues for Examination

Ref	Description of issue	Affected stakeholder(s)	Signposting (to RAG application evidence)		Likelihood of the issue being resolved during the Examination
PMI 1	<p>Offshore & Undergrounding Alternatives: Objection to the current 400kv overhead power line. Desire for an offshore option, or where this proves undeliverable then support given to an underground cable route. Consideration should include the need for the development at the present time.</p>	<p>Basildon</p> <p>Braintree</p> <p>Brentwood</p> <p>Chelmsford</p> <p>Colchester</p> <p>Essex CC</p> <p>Norfolk CC</p> <p>South Norfolk</p> <p>Suffolk CC</p> <p>Tendring</p>	SoCG	Red	The applicant has assessed an equivalent offshore option. To deliver the same capacity as the overhead line, three subsea cables and associated onshore infrastructure would need to be built.

PMI 2	East Anglian Connection Node (EACN): substation location and cumulative effects.	Tendring Colchester Chelmsford Essex CC Suffolk CC Babergh Mid Suffolk	SoCG	Amber	The applicant has considered a number of alternative sites for the EACN. The applicant's proposed location remains the preferred site based on all assessments.
PMI 3	Routeing Alternatives Routeing and use of Overhead lines rather than undergrounding cables	Norfolk CC Suffolk CC Babergh Mid-Suffolk Essex CC Chelmsford	SoCG	Amber	Further discussion around assessments and mitigation have been discussed in the appropriate thematic group meetings and will be presented in the Environmental Statement. Evidence of how change requests have been resolved should also be included.
PMI 4	Impacts on Third Party Developments	Essex CC Brentwood Basildon Thurrock	SoCG	Amber	The applicant has taken into account the potential effect of its proposals when developing the route alignment.

PMI 5	<p>Airfields</p> <p>Impacts on civil aerodrome sites</p>	<p>Airfield operators</p> <p>Civil Aviation Authority</p> <p>Norfolk CC</p> <p>South Norfolk</p> <p>Suffolk CC</p>	SoCG	Red	<p>The applicant's assessment concludes that aviation operations can continue at the airfields, with 'no' or 'relatively small' adjustments, or proposed compensation in one instance. However, the Civil Aviation Authority, the operators of Raydon, Priory Farm and Tibenham airfields along with Norfolk CC and Suffolk CC disagree.</p>
PMI 6	<p>Construction Access Approach and Route Selection</p> <p>The proposed approach for project construction access, and specific route on the local road networks. Consideration should include Abnormal Indivisible Loads.</p>	<p>Norfolk CC</p> <p>Suffolk CC</p> <p>Essex CC</p> <p>Thurrock</p> <p>National Highways</p>	SoCG	Amber	<p>The project will continue to discuss construction access approach and route selection with stakeholders. The applicant expects this issue is likely to be largely resolved by submission.</p>
PMI 7	<p>Interactions with other DCO's -</p> <p>Lower Thames Crossing (LTC)</p> <p>Bramford to Twinstead 400kV Grid</p> <p>North Falls Offshore Wind Farm</p> <p>Five Estuaries Offshore Wind Farm</p> <p>Tarchon interconnector</p>	<p>Local communities</p> <p>Local Authorities</p> <p>Other NSIP developers</p>	SoCG	Amber	<p>The applicant is seeking to set up joint design workshops with the relevant promoters, local authorities and communities with a view to resolving design issues.</p>

	<p>Ecopower Suffolk Solar Farm</p> <p>East Pie Solar Farm</p> <p>Tasway Energy Park</p>				
PMI 8	<p>Statutory Undertakers & third parties</p> <p>Ongoing discussions to protect third party assets</p>	<p>Network Rail</p> <p>Anglian Water</p> <p>British Pipeline Agency</p>	APA's & SoCG	Green	The applicant will continue to engage with these organisations prior to examination, with a view of resolving outstanding issues.
PMI 9	<p>Management Plans</p> <p>DCO Requirements tying into vague or incorrect Outline Management Plans cause delay and confusion during the post- decision Discharge of Requirements stage. These would</p>	<p>Local communities</p> <p>Local authorities</p>		Amber	Redrafting required

	<p>include Management Plans in respect of:</p> <ul style="list-style-type: none"> • Construction Environmental; • Materials & Waste; • Construction Traffic; • Landscape & Ecological; • Public Rights of Way. 				
PMI 10	<p>AMS/OWSI</p> <p>Archaeological Mitigation Strategy and Overarching Written Scheme of Investigation (AMS/OWSI) is a document which is separate to the management plans, so will need a separate discussion point. The draft requirement wording relies heavily on the AMS/OWSI. However, in its current form this document does not meet the necessary standards or scope to secure appropriate mitigation for impacts on the historic environment. The Draft DCO requirement wording for archaeology will need to be amended significantly</p>	<p>Local communities</p> <p>Local authorities</p>		Amber	Redrafting required

	if the AMS/OWSI cannot be brought up to the appropriate standard.				
	<p>Trees and Hedgerows</p> <p>SCC are concerned that the Tree and Hedgerow Surveys, Aboricultural Method Statements and Tree Protection Plans are not mentioned in any Requirement. They should be specifically mentioned, if covered by the OLEMP Requirement and it should be clear that they will need to be agreed with the relevant dischging authority.</p>	<p>Local communities</p> <p>Local authorities</p>		Amber	Proposals required
PMI 11	<p>Compensation</p> <p>Application of the Mitigation Hierarchy, prioritise avoidance and minimise impacts but compensation must be used as a last resort</p>	<p>Local communities</p> <p>Local authorities</p>		Amber	Proposals required
PMI 12	Section 85 Duty 'Furthering the Purposes' of the National Landscape	<p>Local communities</p> <p>National Landscape Partnership</p> <p>Local authorities</p>		Amber	Proposals required

PMI 13	Community Benefits Package Consideration should be given to a voluntary community benefit	Local communities Local authorities	SoCG	Amber	Proposals required
PMI 14	Skills Initiatives to encourage the local workforce must be included	Local communities Local authorities		Amber	Proposals required
PMI 15	Tourism Areas such as the Dedham Vale have a significant visitor economy which needs to be protected.	Local communities Local authorities		Amber	Proposals required
PMI 16	Biodiversity Net Gain Planting and management need to be appropriate to facilitate BNG	Local communities Local authorities Natural England		Amber	Proposals required
PMI 17	Development Consent Order Some redrafting is inevitable	Local communities Local authorities		Amber	Redrafting required
PMI 18	Environmental Statement Some additional information likely to be required for example in respect of heritage assets	Local communities Local authorities		Amber	Redrafting required

Potential Main Issues

Ref	Description of issue	Affected stakeholder(s)	Signposting (to application evidence)	RAG	Likelihood of the issue being resolved during the Examination
PMI 1	Offshore Alternative Route: Objection to the current 400kv overhead power line. Desire for an offshore option, or where this proves undeliverable then support given to an underground cable route.	Basildon Braintree Brentwood Chelmsford Colchester Essex CC Norfolk CC South Norfolk Suffolk CC Tendring	SoCG	Red	The applicant has assessed an equivalent offshore option. To deliver the same capacity as the overhead line, three subsea cables and associated onshore infrastructure would need to be built.
<u>PMI 2</u>	<u>Conflict with the Lower Thames Crossing NSIP</u> <u>Objection to the development from National Highways on the basis that it is currently not compatible with the design and construction programme for the consented Lower Thames Crossing</u>	<u>National Highways</u>	<u>SoCG; consultation report</u>	Red	<u>National Highways consider the conflict to be capable of resolution, but this will require meaningful and regular engagement, and will likely require changes to both the Applicant's design and construction approach, and appropriate protective provisions</u>

	<u>project, and so would have a very significant adverse impact on its delivery.</u>				<u>and a legal agreement for the benefit of the Lower Thames Crossing project.</u>
PMI 32	East Anglian Connection Node (EACN): substation location and cumulative effects.	Tendring Colchester Chelmsford	SoCG	Amber	The applicant has considered a number of alternative sites for the EACN. The applicant's proposed

		Essex CC			location remains the preferred site based on all assessments.
PMI <u>43</u>	Routeing Alternatives Routeing and use of Overhead lines rather than undergrounding cables	Norfolk CC Suffolk CC Babergh Mid-Suffolk Essex CC Chelmsford <u>National Highways</u>	SoCG	Amber	Further discussion around assessments and mitigation have been discussed in the appropriate thematic group meetings and will be presented in the Environmental Statement.
PMI <u>54</u>	Impacts on Third Party Developments (other than the Lower Thames Crossing)	Essex CC Brentwood Basildon Thurrock	<u>SoCG</u>	Amber	The applicant has taken into account the potential effect of its proposals when developing the route alignment.
PMI <u>65</u>	Airfields Impacts on civil aerodrome sites	Civil Aviation Authority	<u>SoCG</u>	Green	The applicant's assessment concludes that aviation operations can continue at the airfields, with 'no' or 'relatively small' adjustments, or proposed compensation in one instance.
PMI <u>76</u>	Construction Access Approach and Route Selection	Norfolk CC Suffolk CC	SoCG	Green	The project will continue to discuss construction access approach and route selection with stakeholders. The

	The proposed approach for project construction access, and specific route on the local road networks.	Essex CC Thurrock National Highways			applicant expects this issue is likely to be largely resolved by submission.
PMI 7	Interactions with other DCO's – Lower Thames Crossing (LTC)	National Highways	SoCG	Green	The applicant is seeking to set up a joint design workshop with LTC with a view to resolving the issues.
PMI 8	Statutory Undertakers & third parties Ongoing discussions to protect third party assets	Network Rail Anglian Water British Pipeline Agency <u>National Highways</u>	APA's & SoCG	Green	The applicant will continue to engage with these organisations prior to examination, with a view of resolving outstanding issues.

Subject: [EXTERNAL] Re: Norwich to Tilbury - Potential Main Issues
Sent: 7/31/2025, 06:04:32
From: [REDACTED]@anglianwater.co.uk>
To: Jonathan Binks
Cc: [REDACTED]
Attachments: [Outlook-ph0twu54](#)

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Dear Jonathan,

Thank you for setting out the PMI's for the examination. We have reviewed the single PMI (8) which applies to Anglian Water:

PMI 8	Statutory Undertakers & third parties Ongoing discussions to protect third party assets	Network Rail Anglian Water British Pipeline Agency	APA's & SoCG	Green	The applicant will continue to engage with these organisations prior to examination, with a view of resolving outstanding issues.
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We consider that PMI 8 should be **Amber** given the outstanding matters that have yet to be resolved in advance of examination, in terms of the interfaces between the Project and our assets (such as safety/maintenance, heat issues, and the need for diversions), including agreement on the bespoke Protective Provisions for Anglian Water.

In addition, there are matters that we've included in the draft Statement of Common Ground which include:

- non-domestic water demands of the Project and whether there is sufficient resource available to supply construction compounds with concrete batching plants within our water resource zones
- interfaces with our AMP8 investment schemes for delivery between 2025-2030, and how these will be managed

We would consider that both these matters are **Amber** as there are, as yet, no agreed processes or measures in place to resolve these matters.

Best wishes,

[REDACTED]



[REDACTED]
Spatial and Strategic Planning Manager
Mobile: [REDACTED]

Web: www.anglianwater.co.uk
Anglian Water Services Limited
Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon, Cambridgeshire, PE29 6XU

From: Jonathan Binks [REDACTED]@nationalgrid.com>
Sent: Thursday, July 17, 2025 15:25
To: [REDACTED]@anglianwater.co.uk>

Subject: Norwich to Tilbury - Potential Main Issues

EXTERNAL MAIL - Please be aware this mail is from an external sender - THINK BEFORE YOU CLICK

I am contacting you on behalf of the Consents Team at National Grid in relation to the Norwich to Tilbury Project. I believe you have been in contact with my colleague Michael in relation to the interface between the NTT scheme and Anglian Water's estate.

Please could you confirm if you agree whether these are the potential main issues and provide a response to this email by close of play 1st August 2025.

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National Grid plc
National Grid House,
Warwick Technology Park,
Gallows Hill, Warwick.
CV34 6DA United Kingdom

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