

Siân Evans
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
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7 October 2025
By email

Your Reference EN020027

Dear Siân

**National Grid Electricity Transmission plc
The proposed Norwich to Tilbury Development Consent Order
Applicant's Initial Response to Section 51 Advice**

Thank you for issuing the Section 51 Advice and Section 55 Checklist alongside the acceptance decision on 26 September 2025. This letter represents the applicant's initial response and an indication of the likely next steps.

Consultees identified on a precautionary basis

Thank you for providing, at box 6 of the section 55 checklist, details of prescribed consultees that were not listed as having been consulted under S42(1)(a) in the applicant's consultation report. Not all of these are technically required but adopting a precautionary approach, we will consult these prescribed consultees and statutory undertakers under S56(2)(a).

Environmental Statement

We want to avoid any misunderstanding around the difference between (1) the "supplementary environmental information" associated with ongoing survey work and that which we were referring to in our application covering letter, as something we do propose submitting and (2) "further environmental information" needed to satisfy the requirements of regulation 14 of the Infrastructure Planning (EIA) Regulations 2017 (which we were not referring to in the application covering letter). The latter is a term with specific meaning used in the Regulations, the former is not, and so it is important not to confuse the two. The information we are talking about does not meet the criteria for being "further environmental information" under regulation 14, which is why we have been careful to describe it instead as "supplementary environmental information".

For the avoidance of doubt, the environmental information to be provided prior to examination relates to pre-application discussions had with the Planning Inspectorate on "supplementary environmental information" at the 19 March 2025 Project Update Meeting. Our response to this meeting is set out in Appendix A3 of the ES (document 5.1 Appendix A3, APP-067) – "Regard had to advice received from the Planning Inspectorate under section 51" - and the latest position was confirmed in the 'Other Matters' section of the Application Cover Letter (document 1.2, APP-002).

The Environmental Statement refers to future or further "supplementary environmental information" and the difference between "supplementary environmental information" and "further environmental information" is then set out in Environmental Statement Chapter 5: EIA Approach and Method (document reference 6.5 – APP-135). Please refer to footnote 6 on page 9 that states:

'Note that although reference is made to 'further environmental information' within relevant environmental topic chapters in the ES (Volume 6 of the DCO application), this term is not being used as the term of art defined in Reg 3(1) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The nearest equivalent under Reg 3(1) would be 'any other information'.

The matter of a timetable is considered later in this letter. The timetable does not include any consultation as we do not consider it is necessary under the relevant regulations.

Development Consent Order

In your letter you seek further clarification firstly on why Schedule 9A of the draft DCO is numbered "9A" rather than an individual consecutive number and secondly on why OS grid references are missing.

Schedule 9A of the draft DCO (document 3.1, APP-056) is bespoke to the protection of UKOP apparatus. Discussions with the owner of that apparatus started in advance of the application and are ongoing. The inclusion of specific Order drafting and an accompanying schedule identifying the nature and extent of the protective powers was considered to be the most appropriate way forward in the absence of formal third-party agreements being finalised. Schedule 9A was added to the draft Order and labelled "9A" to avoid re-numbering the other draft Order schedules and to ensure consistency across a number of other application documents, including the plans. As such, the schedule was added as Schedule 9A. We note also that the drafting passed the validation test. The Applicant will, however, update the Order schedule numbering and cross-references when the next revision of the draft Order is produced.

Schedule 9A includes spaces to allow the relevant OS co-ordinates to be added once discussions on the finer detail on what is required have been finalised.

Funding Statement

We can confirm the estimated cost of the project will be updated to align with the land acquisition cost base.

Missing land information, minor errors and omissions

We will provide a set of updated documents to address the minor errors identified in the Section 55 check list around the end of this week, in advance of the commencement of the relevant representations period.

An updated Environmental Statement (ES) Figure 16.1: Primary Access Routes (document reference 6.16.F1) will also be submitted to ensure that all primary access routes (and other detail) are visible and not obscured by text boxes.

Enhanced Version of the Land Rights Tracker

At our meeting on 13 August 2025, we discussed which version of the land rights tracker would be submitted with the application. We confirmed at the meeting that we would submit the shorter, previous version, with the application and submit an updated version during the pre-examination stage. The S51 advice provided was for this information be included in the application submission cover letter for clarity, which was the case. We are not aware that the longer version has relevance to the start of the relevant representation period, although we do think there is some benefit in sharing it before the start of the Examination.

We are working to deliver in a precautionary, proportionate and balanced way. We anticipate being able to provide the longer schedule to you before 31 October 2025 to allow you to publish it during the relevant representations period. It will be available for the majority of the relevant representations period, and significantly in advance of the start of the Examination.

Timetable for submissions.

We aim to provide updated information to the following timetable:

- Around the end of this week, we will provide updated Special Category and Crown Land Plans, the Primary access route (PAR) plans ES figure 16.1 and other documents to address the minor errors identified in the Section 55 check list. This will be in advance of the commencement of the relevant representations period.
- Before the end of this month, we will provide the enhanced version of the land rights tracker.
- In November we will submit the outstanding ecology surveys as agreed with Natural England.
- In January 2026 we will submit completed geophysical survey results for 'priority areas' and approximately half the 'non-priority' geophysical survey areas. We will also submit the remainder of the archaeological trial trenching results for the priority areas.

As would be expected on a project of this scale, a very small proportion of fieldwork for the priority areas is not expected to have been completed and stakeholders have been kept informed of this and have not raised any objections. The 'priority areas' include those elements of the development that are more commonly evaluated in advance of consent being granted and therefore the information available in advance of examination will be consistent with other DCO projects. The remaining 'non-priority' geophysical surveys and the 'non-priority' archaeological trial trenching would be undertaken throughout 2026 to ensure information is available to inform detailed design and enable ongoing agreement of detailed mitigation with stakeholders. This represents more work at this stage than other applications for development consent which sometimes leave this work to the post decision stage.

Correspondence

If you have any queries about the content of this letter, please contact [REDACTED] in the first instance. His contact email address is [REDACTED]@nationalgrid.com,

Please acknowledge safe receipt of this letter.

Yours sincerely,

[REDACTED]
Project Director