

AENC-NG-CNS-REP-0209

Norwich to Tilbury

Volume 9: Change Application

**Document: 9.1 Notification of proposed change to DCO application -
Change Request 1 (Bulphan)**

Final Issue A

December 2025

Planning Inspectorate Reference: EN020027

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

nationalgrid

Susan Hunt
Lead Member of the Examining Authority
The Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

BY EMAIL ONLY

12 December 2025

Your Reference: EN020027

Dear Susan,

Application by National Grid Electricity Transmission (the Applicant) for an Order Granting Development Consent for the Norwich to Tilbury Project (Planning Inspectorate Reference EN020027)

Notification of Applicant's Intention to Submit a Request for a Proposed Change to the Development Consent Order Application

Bulphan: Change to Third Party Access and Works (Change Request 1)

1 Introduction

- 1.1.1 An application for development consent for the Norwich to Tilbury Project (the Project) was submitted by National Grid Electricity Transmission plc (the Applicant) on 29 August 2025. The application was accepted for Examination on 26 September 2025 and is currently in the pre-Examination period.
- 1.1.2 During this period the Applicant has continued engagement with stakeholders. As a result of this dialogue, the Applicant is proposing to incorporate a design change into the Project (Change Request 1). The change proposed applies to a very discrete geographical area of the Project and, as a consequence, the vast majority of the Project will remain entirely unchanged.

- 1.1.3 The Applicant is of the view that the proposed change is not substantial (both in and of itself and also when considered cumulatively alongside Change Request 2 (as defined below)) and that the inclusion of the change would not result in a materially different project. Change Request 1 responds positively to comments from stakeholders and is considered necessary to avoid or minimise potential operational impacts of the Project on existing third-party infrastructure.
- 1.1.4 Change Request 1 is explained in more detail below.
- 1.1.5 The purpose of this letter is to provide formal notification to the Examining Authority (ExA) that the Applicant intends to apply to make a change to the application for the Project (the Proposed Change Application 1).
- 1.1.6 In parallel to this notification, the Applicant has also notified the ExA of a separate design change (Change Request 2) intended to be made to the application for the Project (the Proposed Change Application 2). Details relating to the Proposed Change Application 2 are included in a separate letter of notification issued by the Applicant to the ExA on 12 December 2025.
- 1.1.7 Taking account of the scale of the Project and the very discrete geographical locations affected by each of Change Request 1 and Change Request 2, the Applicant considers it is appropriate and necessary for the Proposed Change Application 1 and the Proposed Change Application 2 to proceed in parallel to one another.
- 1.1.8 In providing this notification in respect of the Proposed Change Application 1, the Applicant has had regard to the Planning Inspectorate's (2024) advice: *Nationally Significant Infrastructure Projects: Changes to an application after it has been accepted for examination* (PINS Guidance 2024).
- 1.1.9 Accordingly, the remainder of this letter sets out the following details relating to the Proposed Change Application 1:
- **Section 2:** contains a description of Change Request 1 and the rationale for making the change.
 - **Section 3:** includes a statement on whether Change Request 1 is expected to result in any new or different likely significant environmental effects.
 - **Section 4:** confirms that Change Request 1 will necessitate changes to the Order Land and, as a consequence, the steps which the Applicant proposes to ensure compliance with the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 (CA Regulations).

- **Section 5:** provides an overview of the Applicant's approach to consultation prior to the submission of the Proposed Change Application 1.
- **Section 6:** details the proposed indicative timetable for the examination of the Proposed Change Application 1, including the likely submission date for the Proposed Change Application 1 and timescales for procedures in relation to Regulations 5 to 19 of the CA Regulations.

1.1.10 The Applicant requests the ExA's advice on the procedural implications of the proposed change, including in respect of the need, scale and nature of consultation to be carried out.

2 Description of the Proposed Change (Change Request 1)

2.1.1 Change Request 1 applies to a very discrete geographical area of the Project and, as a consequence, the vast majority of the Project will remain entirely unchanged if the Proposed Change Application 1 is accepted.

2.1.2 The proposed change **does not** affect the project description as presented in the application documents **nor** the nature of the Project.

2.1.3 A summary of Change Request 1 is set out in **Table 1**.

Table 1: Summary of the proposed change

Change request number	Name of proposed change and description
1	Bulphan: Changes to third party access and works (Section H): an increase in the Order Limits to facilitate works required for the protection of the existing Thames to Buncefield Multifuel Pipeline, west of Langdon Hills Golf Club. This proposed change responds to feedback concerning accelerated corrosion on existing buried metallic services received from the British Pipeline Agency Ltd (BPA) who act as the agent for the owner, United Kingdom Oil Pipelines Limited (UKOP).

2.1.4 Further detail relating to Change Request 1 is set out in the following paragraphs.

- 2.1.5 The proposed alignment for the Project (between Pylon TB239 and TB240) (see Section H of **Works Plans (APP-024)**) will cross the Thames to Buncefield Multifuel Pipeline to the west of Langdon Hills Golf Club. The pipeline, which forms part of the national fuel infrastructure network, is operated by the British Pipeline Agency Ltd (BPA) who act as agent for the owner United Kingdom Oil Pipelines Limited (UKOP).
- 2.1.6 As part of ongoing technical and survey work to inform detailed design, the Applicant has undertaken pipeline studies. The work identified the need for mitigation works to be carried out in respect of the existing Thames to Buncefield Multifuel Pipeline. The proposed measures are likely to involve the installation of zinc earthing strips parallel to, and along, an approximately 2.7km length of the existing pipeline, along with the installation of surface mounted monitoring equipment units. Temporary working and laydown areas will also be required.
- 2.1.7 Typically, these works would be delivered under the asset owner's statutory powers. However, neither the BPA nor UKOP benefit from such powers. Therefore, the Applicant intends for the installation and future maintenance of the required mitigation works to be authorised pursuant to the draft Development Consent Order (draft DCO) (**APP-056**).
- 2.1.8 The change proposed has been discussed and agreed with the BPA.
- 2.1.9 The Applicant considers that the proposed change will not result in any new or different likely significant environmental effects to those reported in the **Environmental Statement (ES) (APP-123 to APP-287)**. This will be confirmed in an Environmental Statement Addendum Report that will be submitted as part of the Proposed Change Application 1. The proposed change is not considered to affect compliance of the Project with planning policies detailed in the **Planning Statement (APP-085)** and **Policy Compliance Document (APP-086)**.
- 2.1.10 The Order Limits are to be increased as a consequence of the proposed change, with powers of compulsory acquisition and temporary possession to be sought by the Applicant over the additional land intended to be brought within the Order limits. Accordingly, the CA Regulations are engaged.

2.1.11 The Applicant is therefore engaging with landowners of affected land parcels to explain the requirement for additional land and to seek the consent of those landowners to the inclusion within the draft DCO (if granted) of compulsory acquisition powers for new land rights in respect of the land affected by the proposed change. However, it has not been possible to secure such consent in advance of issuing this change notification.

2.1.12 The proposed change to the Order Limits is shown on the figures in **Appendix A**.

3 Potential for Change Request 1 to affect the Environmental Statement

3.1.1 PINS Guidance (2024) requires the change notification to include “*a statement establishing whether the proposed change to the application is expected to result in any new or different likely significant environmental effects. This should include a summary description of those effects and any mitigation proposed*”.

3.1.2 A review of the proposed change against all topics forming part of the Environmental Impact Assessment (EIA) has been undertaken to determine whether the proposed change (either individually or in combination with Change Request 2) would result in any new or materially different likely significant effects beyond those reported in the Environmental Statement (ES).

3.1.3 This review has concluded that the proposed change (either in isolation or in combination with Change Request 2) is not likely to affect the overall assessment and conclusions with respect to the likely significant effects presented within the **ES (APP-123 to APP-287)**.

3.1.4 In undertaking this review, the Applicant has also considered again the topics that were previously scoped out as separate ES chapters of the EIA in accordance with the Scoping Opinion for the Project issued on behalf of the Secretary of State on 14 December 2022 (**APP-297**). Taking account of the nature of the additional works proposed and the implementation of mitigation measures already set out in the **ES (APP-123 to APP-287)**, this review has concluded that **there would be no significant effects** on these topics as a consequence of Change Request 1 and, therefore, those topics would not need to be scoped in for further assessment.

3.1.5 Further information on the likely effects of the proposed change will be submitted with the Proposed Change Application 1.

- 3.1.6 In light of the current analysis, it is not considered necessary or appropriate to carry out any publicity that reflects the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations). However, if such publicity is subsequently considered to be required, this would be carried out following acceptance of the proposed changes (if accepted) and in parallel with consultation under the CA Regulations (if required).

4 Compliance with the Infrastructure Planning (Compulsory Acquisition Powers) Regulations 2010

- 4.1.1 The proposed change involves changes to the Order Land and as a result additional compulsory acquisition powers are sought.
- 4.1.2 The Applicant has carried out diligent inquiry to identify and consult land interests in advance of this notification. The Applicant will continue to engage with all persons with an interest in land affected by the proposed change (as well as any other persons identified through further diligent inquiry) in order to seek their consent to the inclusion within the draft DCO (if granted) of compulsory acquisition powers for new land and rights in respect of the land affected by the proposed change.
- 4.1.3 At the time of writing this letter, the Applicant is not able to confirm that consent from all persons with an interest in the additional land has been obtained. Regulations 5 to 19 of the CA Regulations are therefore likely to be engaged.
- 4.1.4 An update on the progress of these discussions, and a copy of any landowner consent obtained, will be included with the Proposed Change Application 1.
- 4.1.5 If consent has not been obtained by the date of submission of the Proposed Change Application 1, the Applicant will publish any required notices in accordance with the CA Regulations and provide the required documents as prescribed by Regulation 5 of the CA Regulations.

- 4.1.6 Given the notification is being submitted prior to the ExA's Rule 6 Letter being published, the Applicant is confident there is time for all required processes set out in the CA Regulations (including notification and publication of the proposed changes which affect additional land/submission of any necessary documentation and any required compulsory acquisition hearings) to be accommodated within the Examination timetable. **Table 2** contains the Applicant's suggested timetable to enable the Proposed Change Application 1 to be considered within the Examination.

5 Consultation

5.1 Overview

- 5.1.1 The Applicant recognises that it is for the ExA to conclude whether consultation is necessary and what constitutes adequate consultation. Therefore, the Applicant welcomes comments from the ExA as to the need, scale and nature of consultation and, in particular, on the adequacy of the Applicant's proposed approach to consultation as outlined below.
- 5.1.2 PINS Guidance (2024) recommends that before submitting a formal change application an applicant should consult all those persons prescribed under Section 42 (a) to (d) of the Planning Act 2008 who would be affected by the proposed change(s) for a minimum of 28 days from receipt of the consultation documents.
- 5.1.3 PINS Guidance (2024) adds that *"if a targeted approach to the identification of those affected by the proposed change is adopted then detailed justification should be provided about why the applicant considers it is not necessary to consult all the prescribed persons"*.
- 5.1.4 The Applicant has considered the advice in PINS Guidance (2024) in developing its approach to consultation on the proposed changes.

5.2 Targeted Consultation Approach

- 5.2.1 As the proposed change relates to a very discrete geographical area of the Project and would not fundamentally change the Project as a whole, the Applicant intends to carry out a targeted consultation with prescribed consultees, relevant local authorities and parish councils, persons with an interest in land affected by the proposed change and nearby properties which are likely to be affected. The Applicant intends to run in parallel a separate targeted consultation on Change Request 2. This follows a similar approach to the targeted consultations completed between January to April 2025 on the Project which informed the submitted DCO application.

- 5.2.2 The Applicant has engaged with technical planning officers at Thurrock Council on Change Request 1 to inform them of the proposed change and to consider their views on the targeted consultation approach.
- 5.2.3 The Applicant has also commenced engagement with landowners affected by the proposed change. The Applicant sent a pre-consultation letter to PILs to inform them of the proposed changes on 9 December 2025. A land interest questionnaire was also enclosed with the letter to PILs who haven't previously completed one. Further discussions will be held with those landowners as part of the Applicant's proposed consultation and engagement activities.
- 5.2.4 Subject to the ExA's comments, the Applicant proposes to carry out a targeted consultation on Change Request 1 between 19 January 2026 to 20 February 2026 (allowing more than a 28-day consultation period). The Applicant will send a letter before 19 January 2026 to relevant stakeholders outlining the proposed change, consultation scope, dates of consultation and details of how to participate in the consultation. The letter will refer recipients to the Applicant's website to access the following consultation materials:
- Consultation leaflet on Change Request 1. The leaflet will provide further information on the proposed change and include plans/figures showing the location of the proposed change.
 - Environmental Implications of Change (EIC) Document for Change Request 1. The EIC will provide further information on the likely environmental effects associated with the proposed change compared against the ES.
 - Feedback form.
- 5.2.5 Consultation materials will be available to view on the Applicant's website, and a phone number and email address will be provided for people to request hard copies. These contact details could also be used to contact the Applicant to ask questions on the proposed change.
- 5.2.6 The Applicant intends to publish an advert in local newspapers circulating in the vicinity of the proposed change to publicise the targeted consultation.
- 5.2.7 As noted above, it is not considered necessary or appropriate to carry out any publicity that reflects the requirements of the EIA Regulations. However, if the ExA considers such publicity is required, then this would be carried out following acceptance of the proposed change (if accepted) and conducted in parallel with notification under the CA Regulations.

- 5.2.8 Given the nature of the proposed change, no in-person consultation events have been considered necessary, however, the Applicant will hold a public webinar for residents living near to the proposed change.
- 5.2.9 The Applicant considers that the above steps will allow those in the wider community, in the area where the limited change is proposed, to comment on the proposed change should they wish to do so.

5.3 *Proposed Change Application 1: Consultation Report*

- 5.3.1 The Applicant will review and have regard to all feedback received on the proposed change following the close of the targeted consultation period. Feedback received will be responded to in the Proposed Change Application 1: Consultation Report and submitted to the ExA as part of the Proposed Change Application 1. Any refinements to the nature of the proposed change as a result of the targeted consultation will also be reported in the Proposed Change Application 1: Consultation Report.

6 **Indicative Timetable**

- 6.1.1 The Applicant is mindful of the need to bring forward any proposed changes to the Project as soon as possible.
- 6.1.2 In accordance with PINS Guidance (2024), the Applicant has provided below details of how the Proposed Change Application 1 could be accommodated within the Examination.
- 6.1.3 The Applicant considers that the early submission of this change notification, prior to the publication of the ExA's Rule 6 Letter, should provide confidence to the ExA that there is time for all the required processes to be undertaken with no delay to the start or completion of the Examination.
- 6.1.4 The timescales provided in **Table 2** align with the six stages set out in PINS Guidance (2024):
- Stage 1: Applicant decides to request changes to an application which has already been accepted for examination (during the pre-examination or examination stage) and informs the ExA in writing.
 - Stage 2: ExA provides advice to the Applicant about the procedural implications of the proposed changes and about the need, scale and nature of consultation that the Applicant should undertake before submitting the change application.
 - Stage 3: Applicant carries out consultation about the proposed changes.

- Stage 4: Applicant makes a formal request to the ExA to change the application by providing the relevant information as set out in PINS Guidance (2024).
- Stage 5: ExA decides whether to accept or reject the change application.
- Stage 6: Where the ExA has decided to accept the change application, the Examination proceeds by considering the 'changed application'.

6.1.5 The Applicant intends to submit the Proposed Change Application 1 towards the end of March 2026. However, the final date that the Proposed Change Application 1 is submitted would be influenced by the number and nature of consultation responses received and the extent to which they result in amendments to the changes as outlined in this letter.

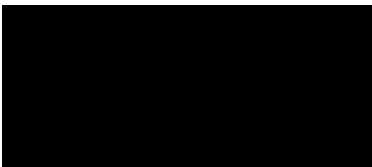
6.1.6 The following table (**Table 2**) contains the Applicant's suggested timetable to enable the Proposed Change Application 1 to be considered within the Examination:

Table 2: Indicative timetable for implementing Change Request 1

Week commencing	CA Regulation	08/12/25	15/12/25	22/12/25	29/12/25	05/01/26	12/01/26	19/01/26	26/01/26	02/02/26	09/02/26	16/02/26	23/02/26	02/03/26	09/03/26	16/03/26	23/03/26	30/03/26	06/04/26	13/04/26	20/04/26	27/04/26	May 26	June 26	July 26
Procedural step																									
Notification of Change Request 1 to the ExA	N/A																								
The ExA to provide views on the change request notification (including proposed consultation approach)	N/A																								
Targeted consultation period carried out by the Applicant (32-day consultation period)	N/A																								
Proposed Change Application 1 submitted by the Applicant	Reg 5																								
Procedural decision by ExA to accept Proposed Change Application 1	Reg 6																								
Notification and publication under CA Regulations carried out by the Applicant (starting from the day after the second notice is published)	Reg 7 and 8																								
Certificates of compliance submitted by the Applicant	Reg 9																								
Notice of any hearings issued by the ExA	Reg 14 and 15																								
ExA make initial assessment of issues arising in connection with Change Request 1	Reg 11																								
ExA sets timetable for examining Change Request 1	Reg 12																								
Hearings (if required)	Reg 14, 15 and 16																								
Written representations and written questions	Reg 12 and 13																								
Responses to written representations and written questions	Reg 12 and 13																								
Comments on responses to written representations and written questions	Reg 12 and 13																								

- 6.1.7 As set out above, the Applicant considers that the early submission of this change notification, prior to the publication of the ExA's Rule 6 Letter, should provide confidence to the ExA that there is time for all the required processes to be undertaken with no delay to the start or completion of the Examination.
- 6.1.8 As noted above, the Proposed Change Application 1 will be accompanied by an Environmental Statement Addendum and Proposed Change Application 1: Consultation Report.
- 6.1.9 In addition, the Applicant also expects to submit as part of the Proposed Change Application 1 revised and/or supplementary versions of existing DCO application documents including, but not limited to, the Book of Reference, Statement of Reasons, Land Plans, draft DCO and Explanatory Memorandum.
- 6.1.10 The Proposed Change Application 1 will also detail any consequential changes or updates required to be made to other DCO application documents in the event that Change Request 1 is accepted into the Examination. The Applicant intends to agree with the ExA the most appropriate point in time during the Examination to submit those updated documents.
- 6.1.11 I would be grateful if you could acknowledge safe receipt of this letter.
- 6.1.12 I would also be grateful for the opportunity to discuss next steps, as well as any queries the ExA or Planning Inspectorate may have regarding the proposals outlined above.
- 6.1.13 In the interim, the Applicant will continue to prepare the Proposed Change Application 1 and, in doing so, anticipates that the targeted consultation will proceed in accordance with the approach and timetable outlined above.

Yours sincerely,



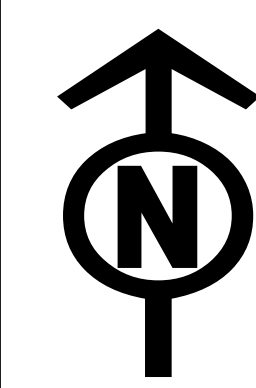
Project Director

For and on behalf of National Grid Electricity Transmission plc

Encs.

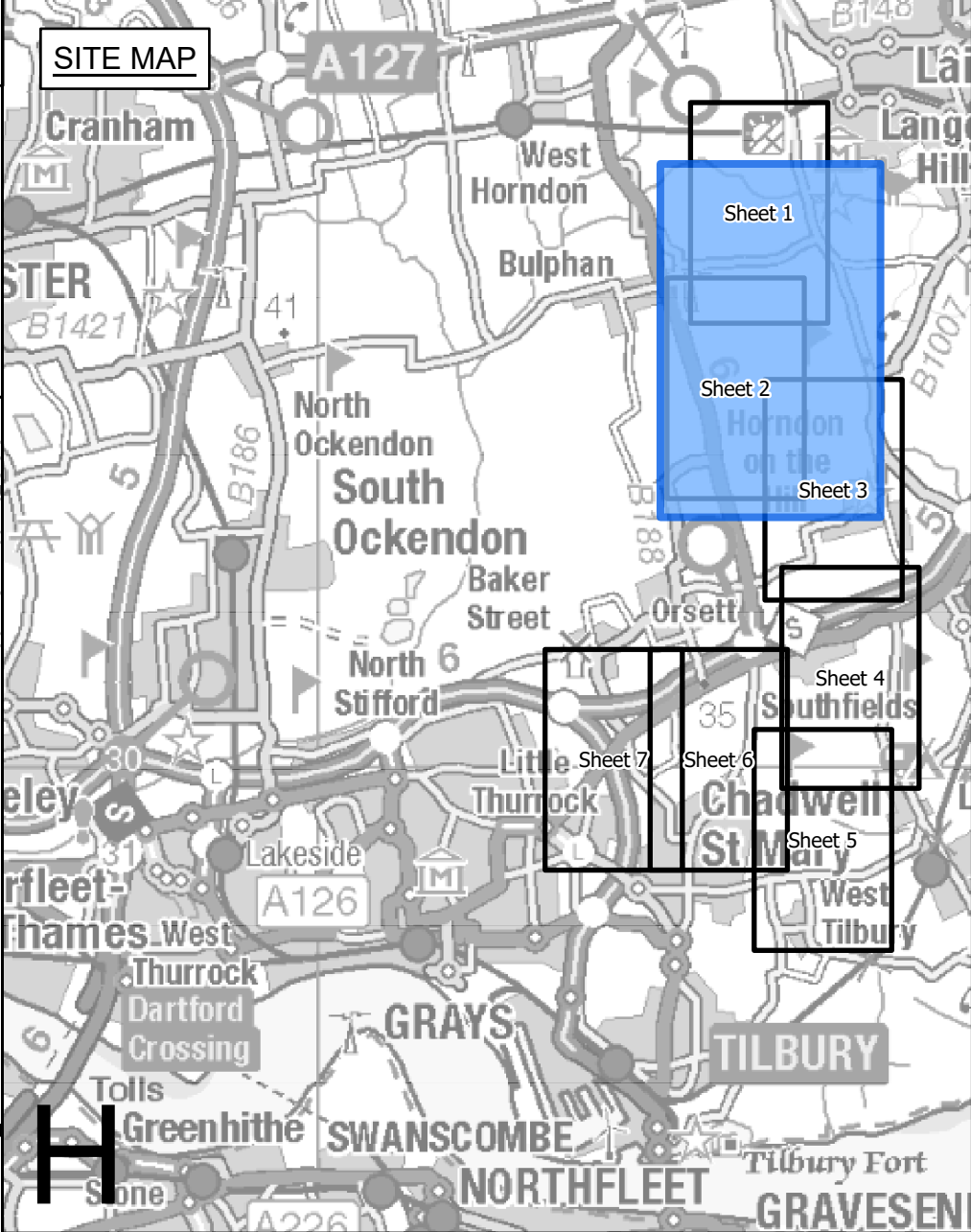
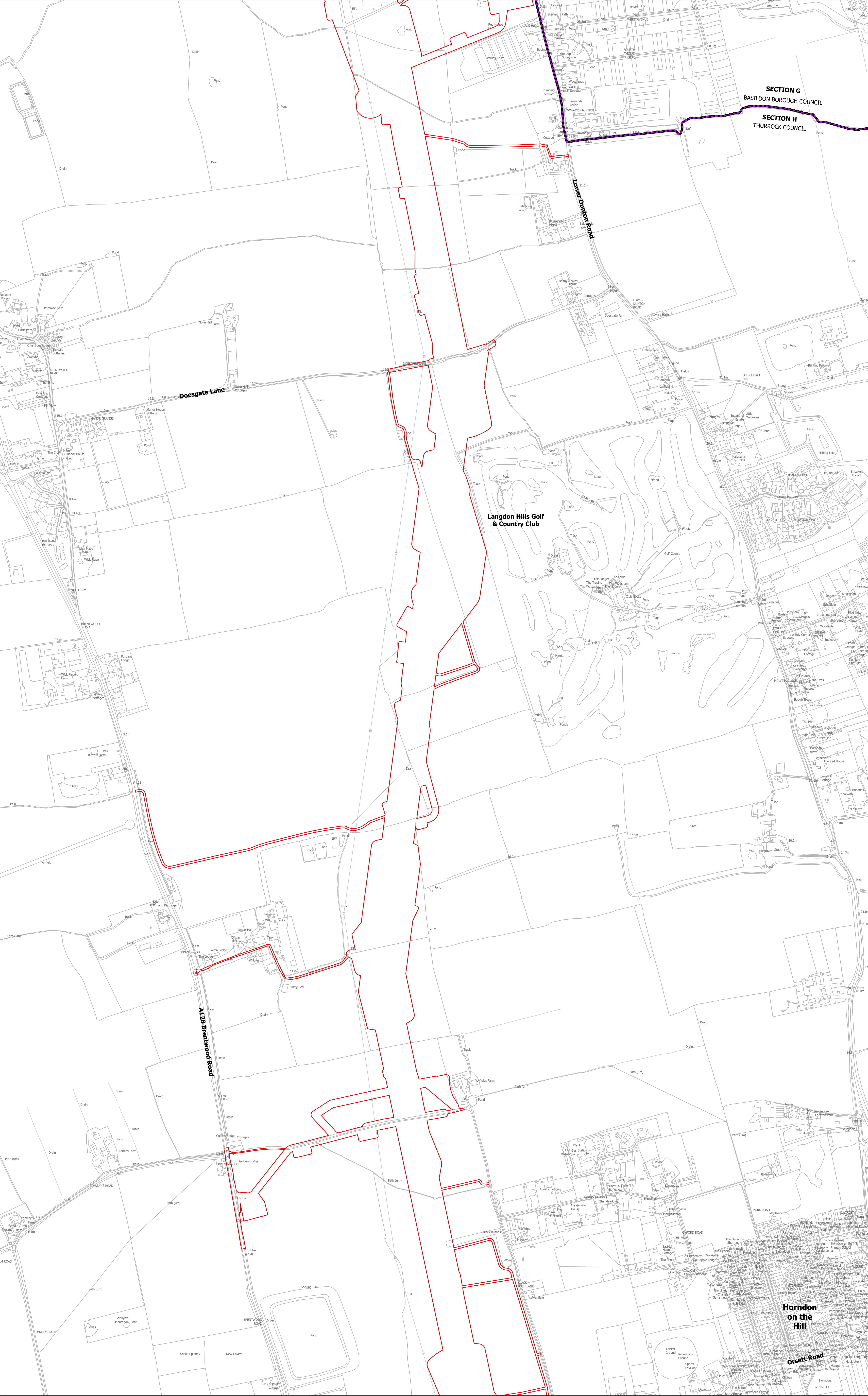
Appendix A: Change Request 1 – Proposed Change Order Limits Plans

Appendix A: Change Request 1 – Proposed Change Order Limits Plans



THE NATIONAL GRID (NORWICH TO TILBURY) ORDER
PROPOSED CHANGE ORDER LIMIT PLANS - CHANGE REQUEST 1
CURRENT PROPOSED PROJECT DESIGN ORDER LIMITS
REGULATION 5(2)(o)
SECTION H (SHEET A, THURROCK COUNCIL)

Application Document 9.1.1



Legend

■ Section boundary & local authority boundary

Proposed Project Design

■ Current Order Limits

Notes

1. These plans show the Order Limits and potential location for the works. Due to the need for future flexibility, National Grid will be applying for Order Limits and Limits of Deviation within its Development Consent Order, within which any final alignments would lie.

2. This drawing is scaled at paper size A0, therefore any prints taken at smaller sizes will affect accuracy of the measurement units and should not be scaled against.

3. These plans have been produced for the purposes of Change Notification in respect of Change Request 1.

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Sheet X Centroid Coordinate: 565603.145 Sheet Y Centroid Coordinate: 185275.932



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Issue	Date	Remarks	Drawn	Checked	Approved
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Title

THE NATIONAL GRID (NORWICH TO TILBURY) ORDER
PROPOSED CHANGE ORDER LIMIT PLANS -
CHANGE REQUEST 1
CURRENT PROPOSED PROJECT DESIGN
ORDER LIMITS
REGULATION 5(2)(o)
SECTION H (SHEET A, THURROCK
COUNCIL)

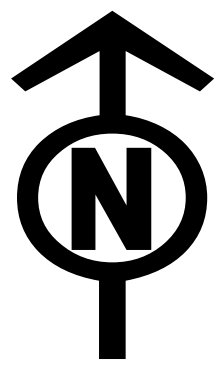
PINS Application Number

EN020027

National Grid Drawing Reference

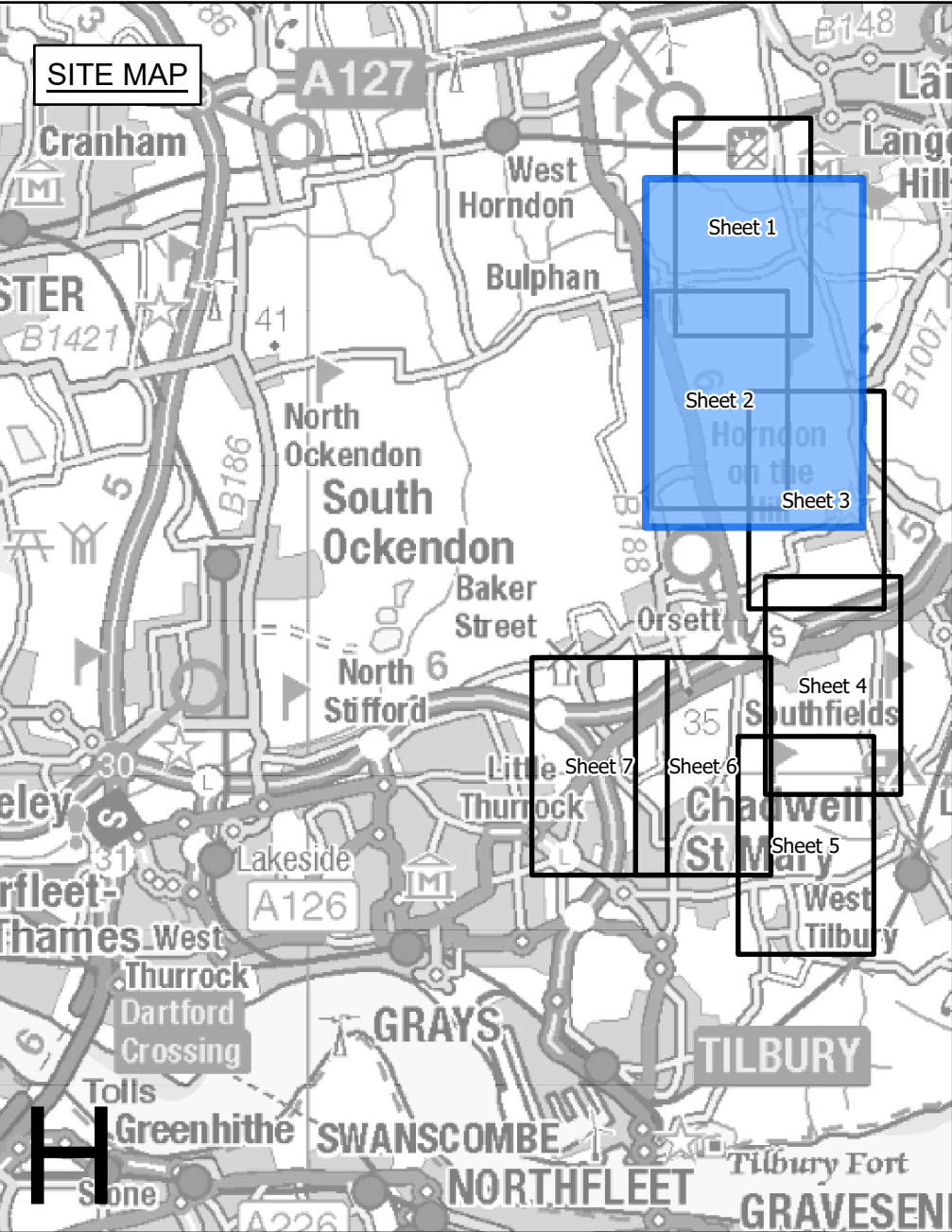
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THE NATIONAL GRID (NORWICH TO TILBURY) ORDER
PROPOSED CHANGE ORDER LIMIT PLANS - CHANGE REQUEST 1
PROPOSED CHANGE TO THE PROJECT ORDER LIMITS
REGULATION 5(2)(o)
SECTION H (SHEET B, THURROCK COUNCIL)

Application Document 9.1.1



Legend

- Section boundary & local authority boundary
- Proposed Project Design**
- Current Order Limits
- Proposed Change Project Design**
- Proposed change Order Limits

Notes

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A	DEC-2025	For Change Notification	TMH	JPC	EE
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ORDER LIMITS
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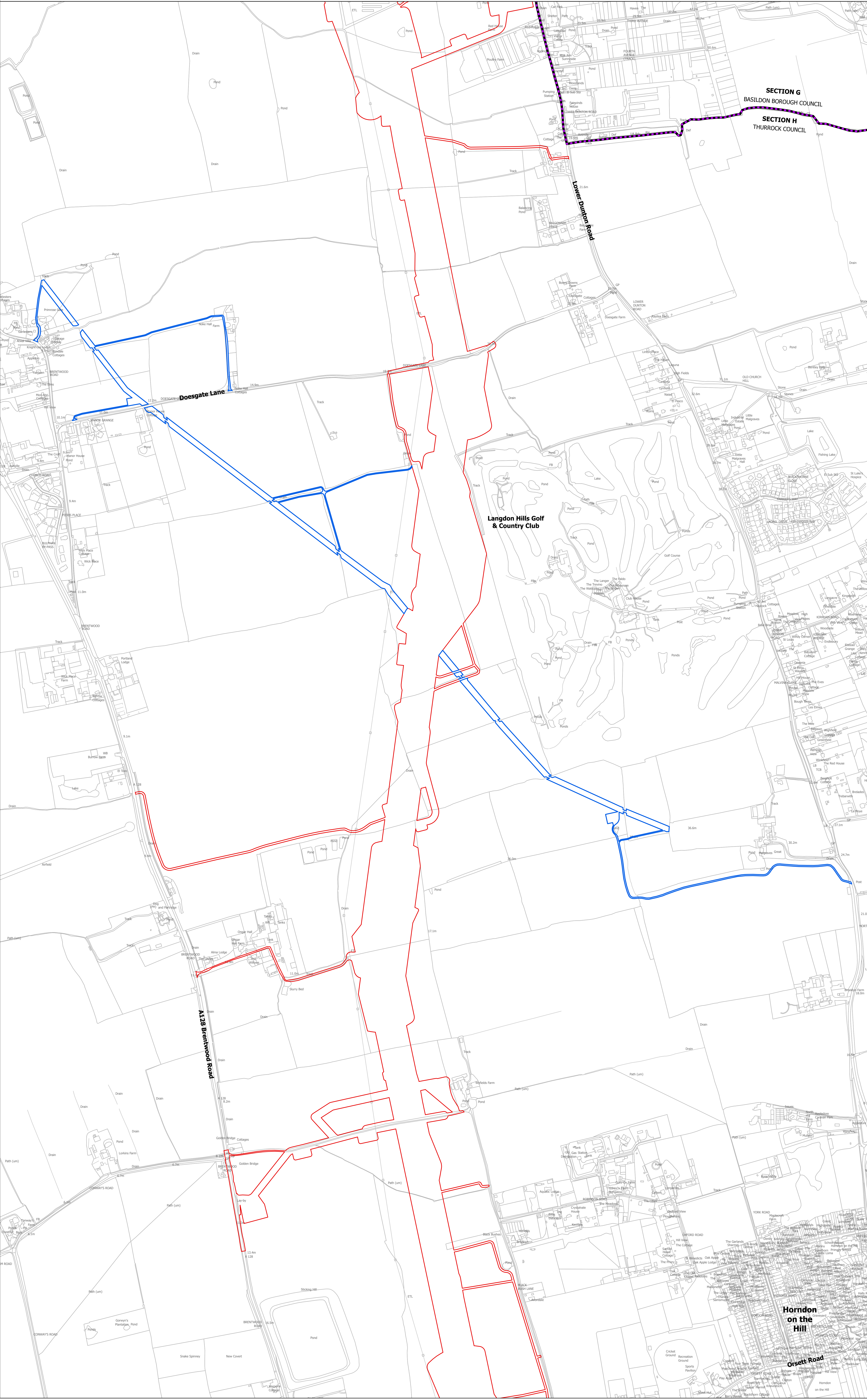
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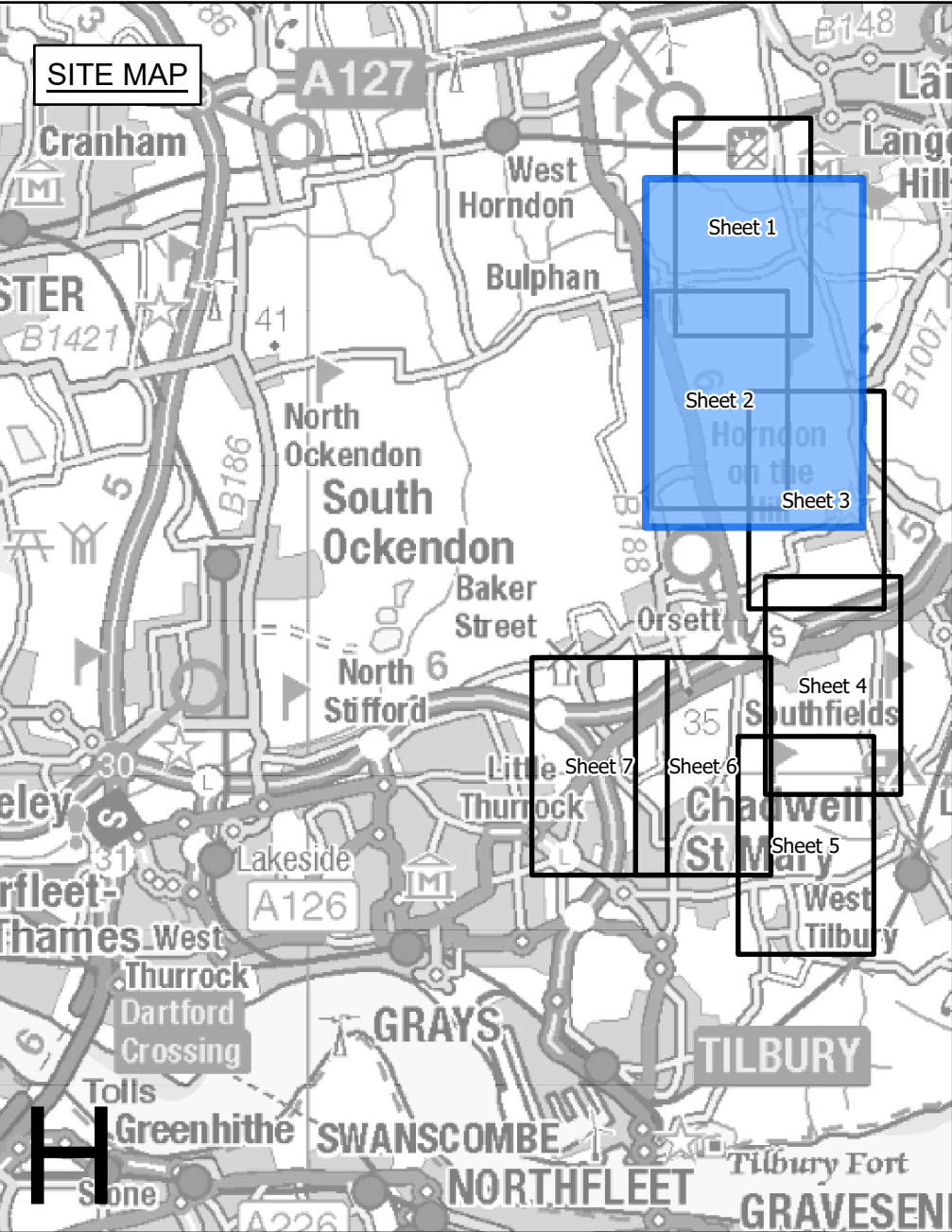
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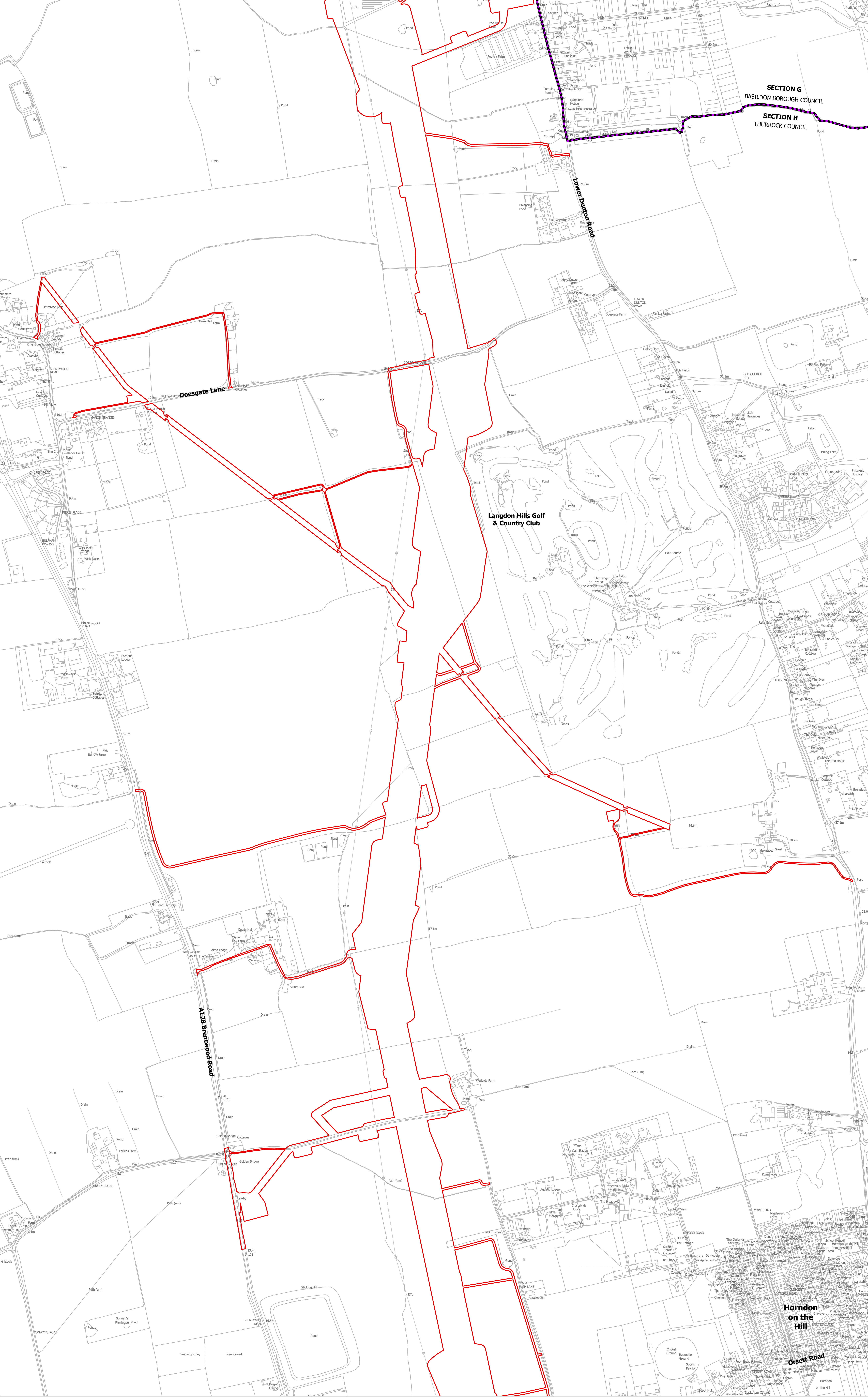


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PROPOSED CHANGE TO THE PROJECT ORDER LIMITS
REGULATION 5(2)(o)
SECTION H (SHEET C, THURROCK COUNCIL)

Application Document 9.1.1



Legend
■ Section boundary & local authority boundary
Proposed Change Project Design
□ Proposed change Order Limits



Notes
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COUNCIL)

nationalgrid

PINS Application Number
EN020027

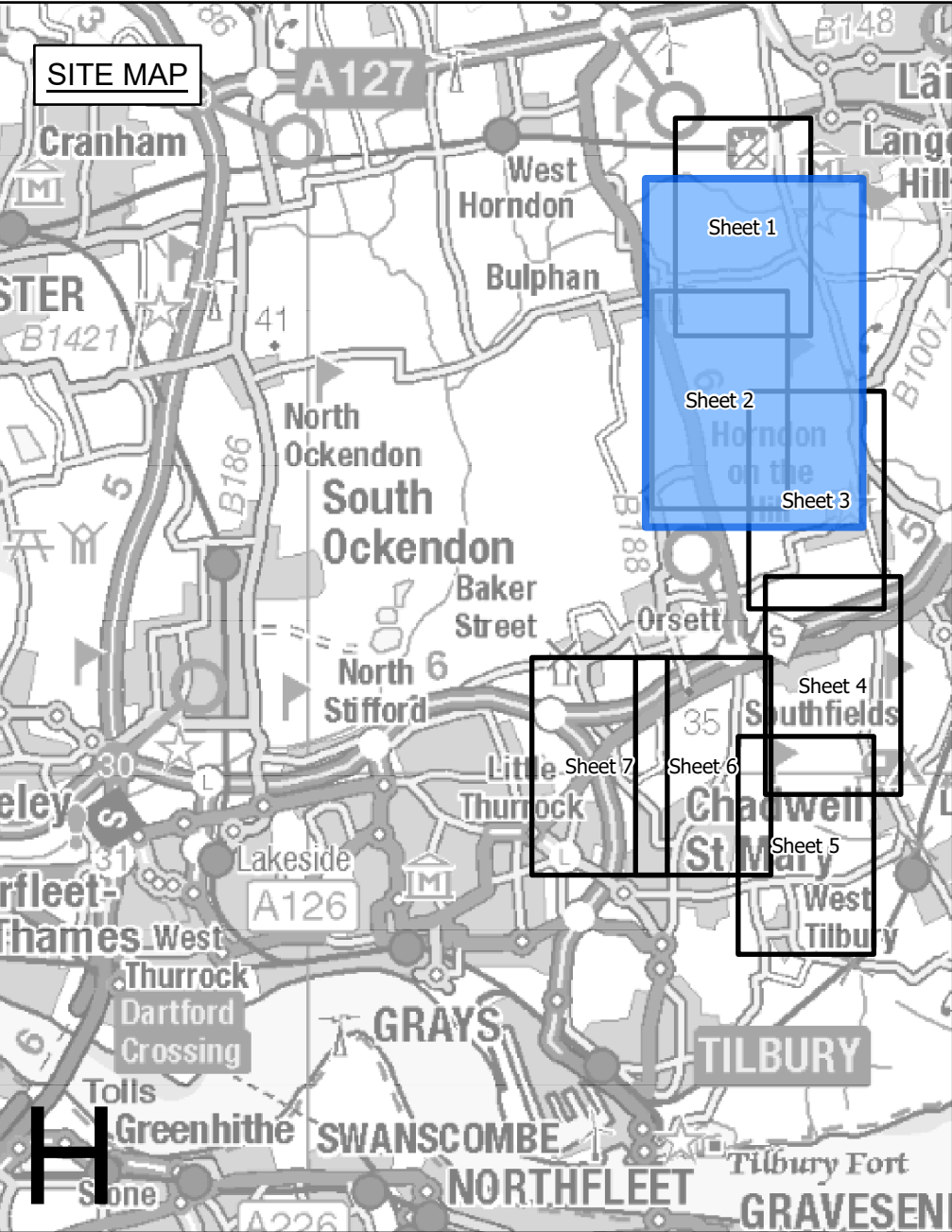
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REGULATION 5(2)(o)
SECTION H (SHEET D, THURROCK COUNCIL)

Application Document 9.1.1



- Legend**
- Section boundary & local authority boundary
 - Proposed Project Design**
 - Current Order Limits
 - Lattice pylons
 - Low height lattice pylons
 - Overhead line

- Notes**
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SECTION H (SHEET D, THURROCK COUNCIL)

PINS Application Number

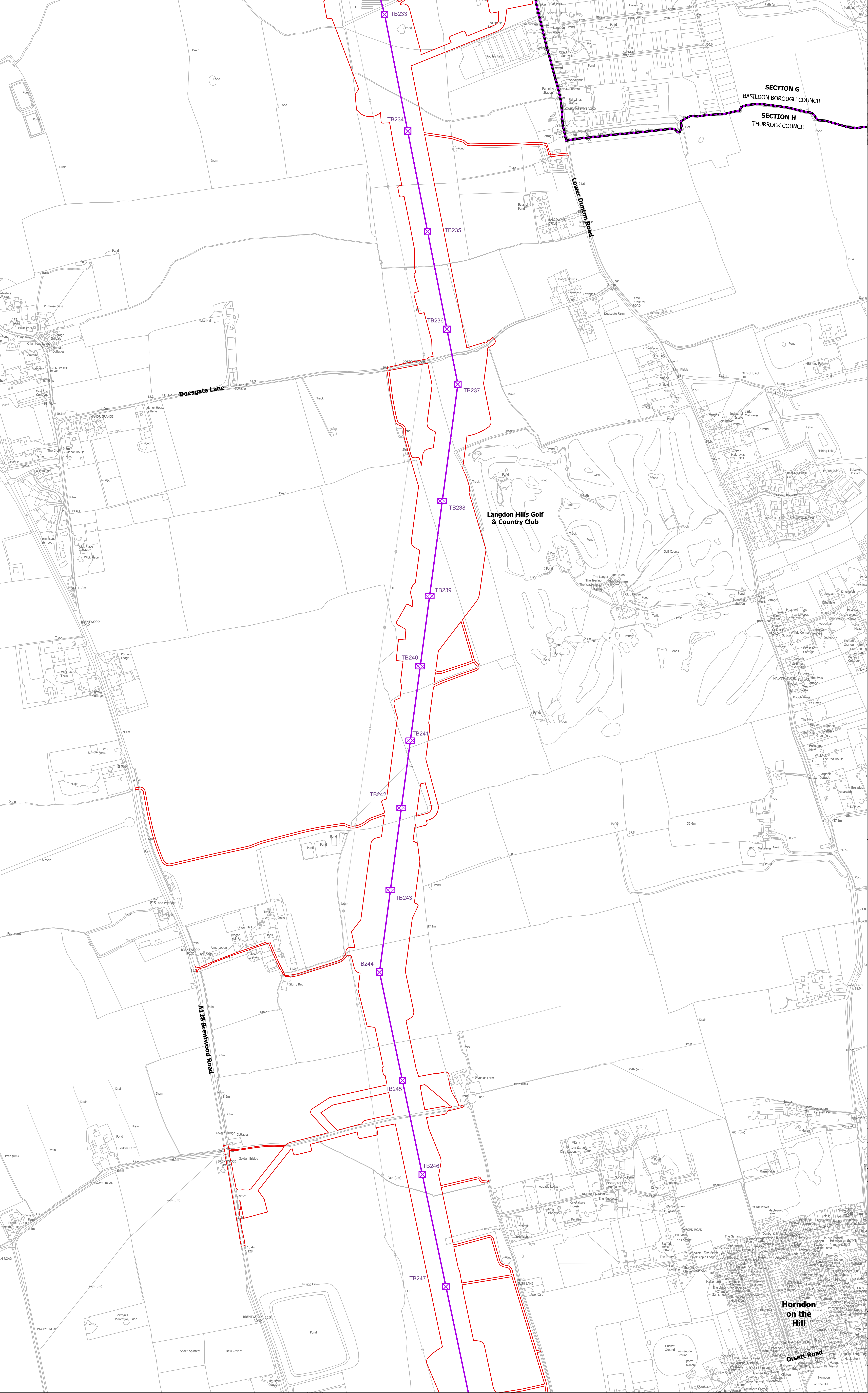
EN020027

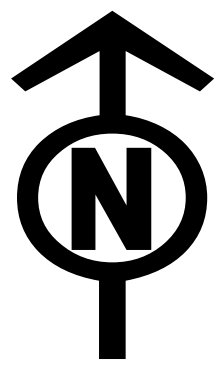
National Grid Drawing Reference

AENC-LSTC-ENG-PLN-0011

Scale	Sheet Size	Sheet	Issue
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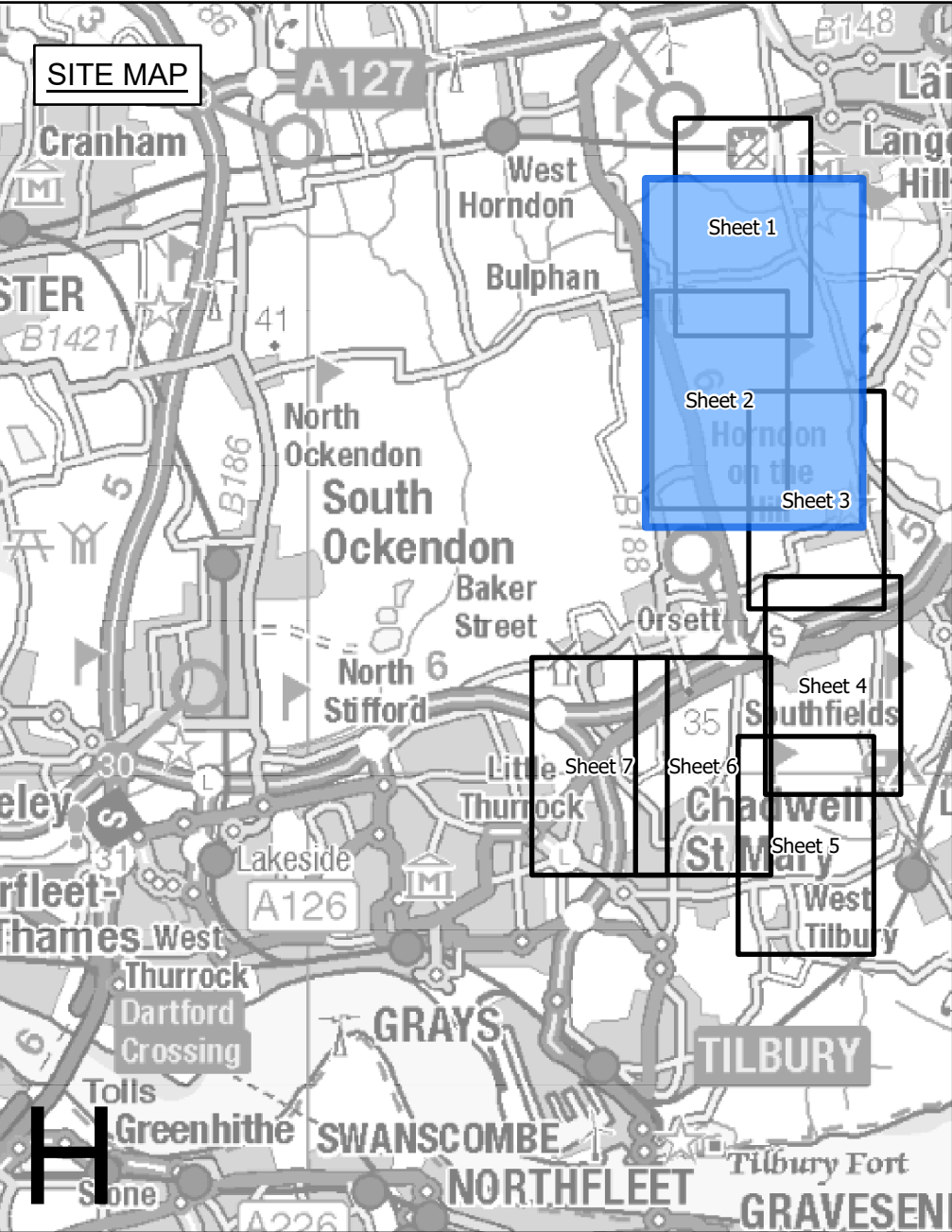
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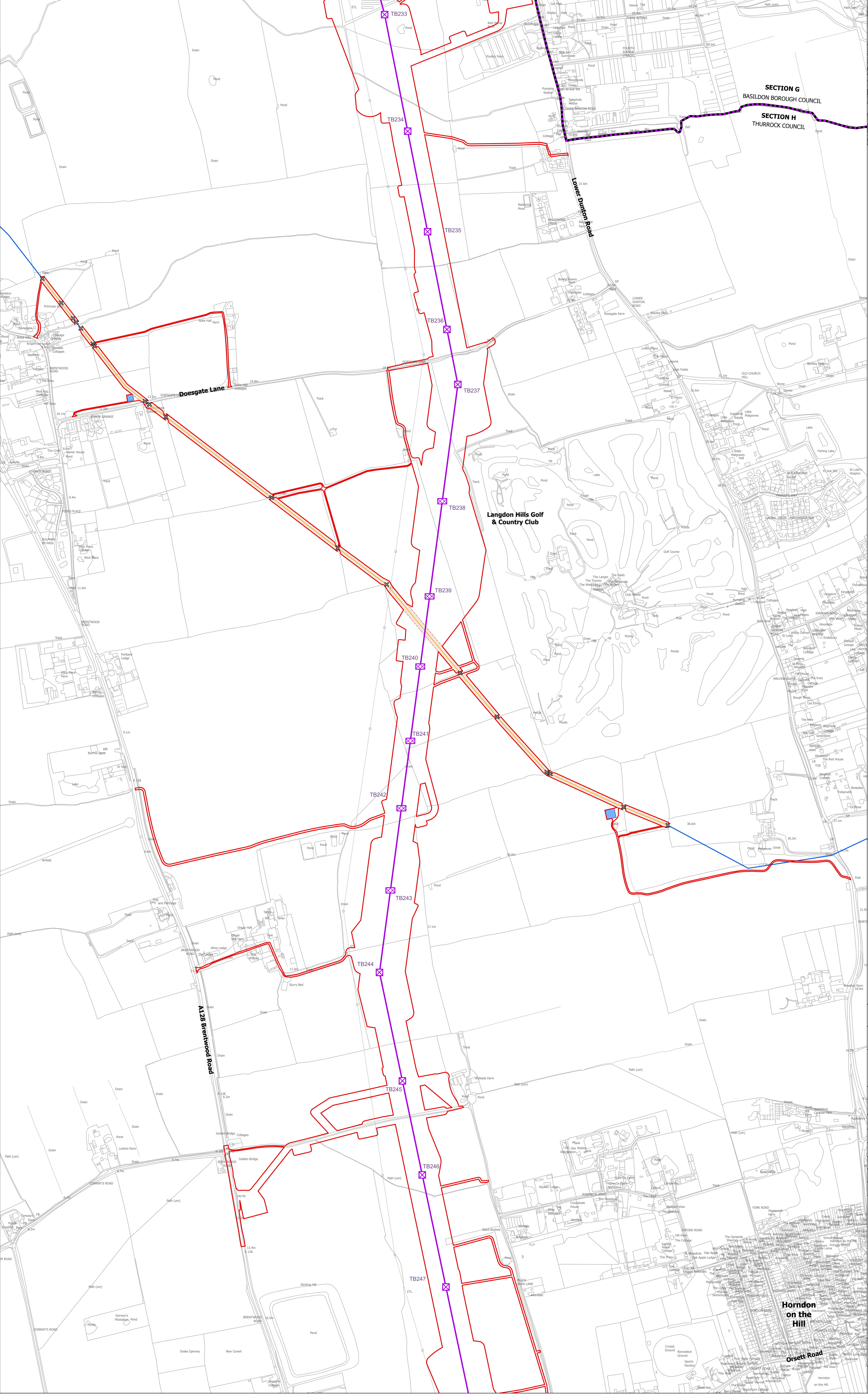


THE NATIONAL GRID (NORWICH TO TILBURY) ORDER
PROPOSED CHANGE ORDER LIMIT PLANS - CHANGE REQUEST 1
PROPOSED CHANGE TO THE PROJECT DESIGN
REGULATION 5(2)(o)
SECTION H (SHEET E, THURROCK COUNCIL)

Application Document 9.1.1



- Legend**
- Section boundary & local authority boundary
 - Proposed Project Design**
 - Lattice pylons
 - Low height lattice pylons
 - Overhead line
 - Proposed Change Project Design**
 - Proposed change Order Limits
 - Existing UKOP apparatus unaffected
 - Existing UKOP apparatus mitigation
 - UKOP apparatus test post (above ground)
 - UKOP apparatus mitigation work area
 - UKOP apparatus mitigation compound



- Notes**
- These plans show the Order Limits and potential location for the works. Due to the need for future flexibility, National Grid will be applying for Order Limits and Limits of Deviation within its Development Consent Order, within which any final alignments would lie.
 - This drawing is scaled at paper size A0, therefore any prints taken at smaller sizes will affect accuracy of the measurement units and should not be scaled against.
 - These plans have been produced for the purposes of Change Notification in respect of Change Request 1.

Coordinate System: British National Grid
Sheet X Centroid Coordinate: 565603.145 Sheet Y Centroid Coordinate: 185275.932



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Issue	Date	Remarks	Drawn	Checked	Approved
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Title
THE NATIONAL GRID (NORWICH TO TILBURY) ORDER
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CHANGE REQUEST 1
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REGULATION 5(2)(o)
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nationalgrid
PINS Application Number
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Scale	Sheet Size	Sheet	Issue
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