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Norwich to Tilbury

Volume 9: Change Application

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- Change Request 1 (Bulphan) (CA1)

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1. Introduction

1.1 Overview

- 1.1.1 On 29 August 2025, National Grid Electricity Transmission plc (the Applicant) submitted an application to the Secretary of State for Energy Security and Net Zero for a Development Consent Order (DCO) to authorise the construction and operation (and maintenance) of the proposed upgrade to the electricity transmission system in East Anglia between Norwich and Tilbury (the Project).
- 1.1.2 The Application for the Project was accepted for Examination by the Planning Inspectorate on 26 September 2025 and has been allocated the reference number EN020027. The Examination of the Project commenced on 10 February 2026 and is expected to close on 10 August 2026.

1.2 The Project

- 1.2.1 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.
- 1.2.2 The reinforcement is needed because the existing transmission network, even with current upgrading, will not have sufficient capacity for the new renewable energy (a substantial proportion of which would be generated by offshore wind) that is expected to connect to the network over the next 10 years and beyond. Completion of the Project, together with other new reinforcements across the county, will meet this future energy transmission demand both in East Anglia and across the UK.
- 1.2.3 The Project comprises:
- A new 400 kilovolt (kV) electricity transmission connection of approximately 180 km overall length from Norwich Main Substation to Tilbury Substation via Bramford Substation, a new EACN Substation and a new Tilbury North Substation, including:
 - Approximately 159 km of new overhead line supported on approximately 509 pylons, either standard steel lattice pylons (approximately 50 m in height) or low height steel lattice pylons (approximately 40 m in height) and some of which would be gantries (typically up to 15 m in height) within proposed Cable Sealing End (CSE) compounds or existing or proposed substations
 - Approximately 21 km of 400 kV underground cabling, some of which would be located through the Dedham Vale National Landscape (an Area of Outstanding Natural Beauty (AONB)¹)

¹ National Landscape is the rebranded name of an Area of Outstanding Natural Beauty (AONB) from 22 November 2023

- Up to seven new CSE compounds (with permanent access) to connect the overhead lines to the underground cables
- Modification works to connect into the existing Norwich Main Substation and a substation extension at the existing Bramford Substation
- A new 400 kV substation on the Tendring Peninsula, referred to as the EACN Substation (with a new permanent access). This is proposed to be an Air Insulated Switchgear (AIS) substation
- A new 400 kV substation to the south of Orsett Golf Course in Essex, referred to as the Tilbury North Substation (with a new permanent access). This is proposed to be a Gas Insulated Switchgear (GIS) substation
- Modifications to the existing National Grid Electricity Transmission overhead lines to facilitate the connection of the existing network into the new Tilbury North Substation to provide connection to the Tilbury Substation
- Ancillary and/or temporary works associated with the construction of the Project.

1.2.4 In addition, third party utilities diversions and/or modifications would be required to facilitate the construction of the Project. There would also be land required for environmental mitigation and Biodiversity Net Gain (BNG).

1.2.5 As well as the permanent infrastructure, land would also be required temporarily for construction activities including, for example, working areas for construction equipment and machinery, site offices, welfare, storage and temporary construction access.

1.2.6 A detailed description of the Project is included in Environmental Statement (ES) Chapter 4: Description of the Proposed Project [APP-130].

1.3 Proposed Change Application 1

1.3.1 Following submission of its DCO application, the Applicant has continued engagement with stakeholders. As a result of this engagement, the Applicant is proposing to incorporate a design change into the Project (Change Request 1 (Bulphan)). The change applies to a very discrete geographical area of the Project, and as a consequence, the vast majority of the Project will remain entirely unchanged.

1.3.2 The Applicant issued **9.1 Notification of proposed change to DCO application – Change Request 1 (Bulphan) [AS-049]** to the Examining Authority (ExA) on 12 December 2025 which set out the Applicant’s intention to make a proposed design change (Changes Request 1 (Bulphan)) to the DCO application and to seek feedback on the procedural implications, including the scope and nature of consultation required. Details of Change Request 1 (Bulphan) are provided below. The ExA responded to the notification **[AS-049]** on 19 December 2025 [PD-008]. The Applicant replied to the ExA’s response on 24 December 2025 **[AS-051]**.

1.3.3 The Applicant subsequently undertook consultation on the proposed changes and refined them based on feedback and ongoing investigations.

1.3.4 This document has been submitted to support Proposed Change Application 1 for Change Request 1 (Bulphan). Change Request 1 (Bulphan) relates to 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 the potential for 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). Further details about Change Request 1 (Bulphan) are provided below.

1.3.5 On 27 March 2026 the Applicant formally submitted Change Request 1 (Bulphan) seeking the ExA's consent to incorporate the proposed change into the DCO application currently under examination. This Consultation Report forms part of that submission.

1.3.6 In parallel to the submission of Proposed Change Application 1, the Applicant has also submitted a separate application (Proposed Change Application 2) for a separate design change (Change Request 2 (Little Bromley)). Details relating to Proposed Change Application 2 are included in separate application documents submitted by the Applicant to the ExA on 27 March 2026.

1.4 Description of Change Request 1 (Bulphan)

1.4.1 Change Request 1 (Bulphan) 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.

1.4.2 The Applicant is proposing 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) which acts as the agent for the owner, United Kingdom Oil Pipelines Limited (UKOP).

1.4.3 The proposed alignment for the Project (between Pylon TB239 and TB240) would cross the Thames to Buncefield Multifuel Pipeline to the west of Langdon Hills Golf Club.

1.4.4 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 undertaken for the protection of the Pipeline. The proposed measures are likely to involve the installation of anti-corrosion earthing strips parallel to, and along, an approximately 2.7 km length of the Pipeline, along with the installation of surface-mounted monitoring equipment units. Temporary working and laydown areas will also be required.

1.4.5 The Applicant has undertaken a review of the proposed change against all topics forming part of the Environmental Impact Assessment (EIA) to determine whether the proposed change would result in any new or different likely significant environmental effects to those reported in the Environmental Statement. The review consulted that the proposed change (either individually or in combination with Change Request 2 (Little Bromley)) 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, AS-026 and AS-068]. Further information on the likely effects of the proposed change is included within **Proposed Change Application 1: Addendum to Environmental Statement - Change Request 1 (Bulphan) [document reference 9.11]**.

- 1.4.6 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]**.

1.5 Purpose of this report

- 1.5.1 This Consultation Report has been prepared by the Applicant to support Proposed Change Application 1 for Change Request 1 (Bulphan) to the Development Consent Order (DCO) application for the Norwich to Tilbury Project (the Project).
- 1.5.2 The report outlines the consultation activities undertaken by the Applicant before submitting Proposed Change Application 1, summarises the feedback received, and explains how this input has been considered.
- 1.5.3 This report has been prepared having 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). It also reflects the advice provided by the Examining Authority (ExA) in its correspondence dated 19 December 2025 **[PD-008]**. Details of how the Applicant had regard to the ExA's comments on its consultation approach is set out in Table 5.1 in **Proposed Change Application 1: Overview Report - Change Request 1 (Bulphan) [document reference 9.5]**.

1.6 Overview of the consultation

- 1.6.1 Prior to submitting Change Request 1 (Bulphan), the Applicant has carried out proportionate consultation on the proposed change in accordance with PINS Guidance 2024.
- 1.6.2 In line with PINS Guidance 2024, this Consultation Report:
- Confirms who has been consulted in relation to the proposed change and explains how and why they have been consulted;
 - Includes details of how the Applicant has considered the content of the consultation responses received; and
 - Includes copies of all consultation responses received, including any responses to publicity about the proposed changes.
- 1.6.3 During this targeted consultation for Proposed Change Application 1, the Applicant also ran a parallel but geographically separate consultation on another Proposed Change Application (Proposed Change Application 2 – Little Bromley).

1.7 Structure of this report

- 1.7.1 This Consultation Report is structured as follows:
- Section 1 introduces the report and explains its purpose.
 - Section 2 describes the approach taken by the Applicant to consult on the proposed changes and outlines how this consultation aligns with relevant guidance.

- Section 3 summarises the feedback received during the consultation and details how the Applicant has considered this input.
- Section 4 presents the conclusions drawn from the consultation process.

1.8 Data protection

- 1.8.1 The Applicant is aware that this Consultation Report will be published on the Planning Inspectorate's website. To ensure that it complies with the Data Protection Act 2018, it has avoided the inclusion of personal data relating to individuals, such as names and addresses.

2. Approach to consultation

2.1 Approach

2.1.1 The Applicant aims to ensure effective, inclusive, and meaningful engagement with the local community, statutory and other consultees, and interested parties as reflected in its Stakeholder, Community and Amenity Policy² which incorporates the Applicant's Schedule 9 Electricity Act 1989 Statement relating to the preservation of amenity. It makes the following commitments to consultation when undertaking electricity works:

'We will promote genuine and meaningful stakeholder and community engagement. We will meet and, where appropriate, exceed the statutory requirements for consultation or engagement. We will adopt the following principles to help us meet this commitment:

- *we will seek to identify and understand the views and opinions of all the stakeholders and communities who may be affected by our works;*
- *we will provide opportunities for engagement from the early stages of the process, where options and alternatives are being considered and there is the greatest scope to influence the design of the works;*
- *we will endeavour to enable constructive debate to take place, creating open and two-way communication processes;*
- *we will ensure that benefits, constraints and adverse impacts of proposed works are communicated openly for meaningful stakeholder and community comment and discussion. We will be clear about any aspects of the works that cannot be altered;*
- *we will utilise appropriate methods and effort in engaging stakeholders and communities, proportionate to the scale and impact of the works; and*
- *we will provide feedback on how views expressed have been considered and the outcomes of any engagement process or activity'.*

2.1.2 Building on the consultation and engagement approach established during the pre-application stage, the Applicant has applied these principles, together with the Planning Inspectorate's guidance, to shape its consultation on the proposed changes.

2.1.3 A consultation strategy was prepared and shared with the Local Planning Authority (Thurrock Council) on 18 December 2026. Thurrock Council did not raise any comments in response to the strategy.

² nationalgrid.com/electricitytransmission/document/81026/download

2.2 Who the Applicant consulted

- 2.2.1 As the proposed change relates to a discrete geographical area of the Project and does not fundamentally alter the Project as a whole, the Applicant carried out a targeted consultation.
- 2.2.2 The targeted consultation was open to anyone with an interest in the Project.
- 2.2.3 A bespoke consultation zone was developed to assist engagement with the community local to the proposed change.
- 2.2.4 This bespoke consultation zone was produced to include nearby properties which were likely to be affected. The zone was created following the principle that the consultation zone should be appropriate and proportionate in relation to the type and potential impact of the change. A map of this distribution area can be found in Appendix E.
- 2.2.5 During the targeted consultation, in addition to the properties within the bespoke consultation zone receiving the relevant consultation information in the post, the following groups and stakeholders were consulted with:
- Community forums where any proposed changes fall within their boundary;
 - The local MPs where the location of proposed change falls into all or part of their constituency;
 - Elected representatives in the LPA where the location of the proposed change falls into all or part of their ward;
 - Persons with interest in lands (PILs) within the proposed Order Limits of the relevant consultation zone;
 - ‘Seldom heard groups’ within the relevant consultation zone, representing people who are unlikely to respond to traditional consultation techniques and may need additional support to access materials; and
 - Local interest groups, such as residents’ associations, community groups, and groups with particular specialisms, such as local heritage or wildlife.
- 2.2.6 Table A1 in Appendix A of this report contains the full list of prescribed consultees that were notified in relation to Section 42(a) and (aa) of the Planning Act 2008.
- 2.2.7 Table A2 in Appendix A of this report contains the full list of prescribed consultees that were notified in relation to Section 42(b) of the Planning Act 2008.
- 2.2.8 Table A3 in Appendix A of this report contains the full list of non-prescribed consultees that were identified.
- 2.2.9 The following elected representatives were also notified of the consultation:
- James McMurdock – Member of Parliament for South Basildon and East Thurrock
 - Cllr Barry Johnson – Orsett Ward Councillor
 - Cllr David Drey – Orsett Ward Councillor
- 2.2.10 Additionally, the Applicant engaged with landowners and other persons with an interest in land affected by the change. Appendix B contains a list of affected parties that were identified.

- 2.2.11 Landowners were categorised using the following definitions:
- Category 1 includes owners, lessees, tenants (whatever the tenancy period) or occupiers of the land within Order Limits
 - Category 2 includes parties that have an interest in the land or who have the power to sell, convey or release the land within Order Limits
 - Category 3 includes parties that the Applicant thinks that, if the order sought by the application were made and fully implemented, the person would or might be entitled to make a relevant claim for compensation under section 10 of the Compulsory Purchase Act 1965 and/or Part 1 of the Land Compensation Act 1973 and/or section 152(3) of the Act

2.3 How the Applicant consulted

- 2.3.1 The targeted consultation on the proposed change at Bulphan was open from 12:00 noon on 19 January 2026 until 11:59 pm on 23 February 2026.
- 2.3.2 All notification letters, emails, and website materials clearly stated a consultation response deadline of 11:59 pm on 23 February 2026. The consultation therefore ran for a period exceeding the minimum 28-day period recommended in Planning Inspectorate guidance.
- 2.3.3 During this targeted consultation for Proposed Change Application 1, the Applicant also ran a parallel consultation on another Proposed Change Application (Proposed Change Application 2 (Little Bromley)).
- 2.3.4 Given the limited nature of the proposed change and the fact that it would not fundamentally alter the Project as a whole, consultation was proportionate and focused.
- 2.3.5 Measures were implemented to ensure that those without internet access or who had protected characteristics were included in the consultation, including provision of printed materials, freepost response options, a public information event, and direct engagement with prescribed consultees, affected landowners, local authorities, parish councils, and hard-to-reach groups, in addition to online access to materials and online webinars.
- 2.3.6 The Applicant received no feedback regarding the inclusivity of our consultation or an inability to take part.
- 2.3.7 All responses relevant to Proposed Change Application 1 have been considered and more information on the feedback received can be found in Section 3.

Pre-consultation engagement

- 2.3.8 Letters were sent to elected representatives (as listed in section 2.2.9), community forums and planning officers from Thurrock Council on 11 December 2025 to notify them of the proposed change and targeted consultation. Copies of these letters are available in Appendix F, Figures F1-F4.
- 2.3.9 On 9 December 2025, the Applicant wrote to 98 landowners and land users who may be affected by the proposed change, inviting them to attend officer meetings ahead of the consultation launch. Copies of the letters are provided in Appendix C. One landowner requested a meeting.

2.3.10 On 16 December 2025, the Applicant briefed planning officers from Thurrock Council on the proposed change at Bulphan.

Consultation advertisement

2.3.11 On 16 January 2026 the Applicant sent a consultation pack to all properties within the identified consultation zone shown in Appendix E and persons with an interest in land affected by the proposed change. The consultation pack included the following materials:

- A letter notifying the resident of the change (Appendix F, Figure F7)
- A consultation leaflet (Appendix F, Figure F10)
- A copy of the Environmental Implications of Change (EIC) document (Appendix F, Figure F11)
- A feedback form (Appendix F, Figure F12)
- A Freepost envelope (Appendix F, Figure F13).

2.3.12 All consultation materials directed recipients to the Norwich to Tilbury project website and contained details of how to request paper copies of the documents from the Applicant.

2.3.13 Landowners and land-users who may be affected by the proposed change, as identified in Appendix B, were also sent the same consultation pack on 16 January 2026. Copies of these materials are available to view in Appendix F.

2.3.14 Prescribed and non-prescribed consultees, as listed in Appendix A, were contacted by email on 19 January 2026 to inform them of the launch of the targeted consultation. Copies of correspondence are included in Appendix F, Figures F8 and F9.

2.3.15 Elected representatives as listed in section 2.2.9 of this document were also contacted by email on 19 January 2026. Copies of correspondence are included in Appendix F, Figures F5 and F6.

2.3.16 Information and documents relating to the Change Request 1 (Bulphan) were launched on the project website on 19 January 2026. A copy of the project website is available to view in Appendix F, Figure F17.

2.3.17 The main project webpage was updated on the same date to signpost the targeted consultation. A copy of this update is available in Appendix F, Figure F18.

2.3.18 The webpage received 1,944 page views during the consultation period.

2.3.19 The Applicant notified individuals and organisations on its project contact database of the launch of the targeted consultation via its regular project update email. A copy of this is available in Appendix F, Figure F20.

2.3.20 The project update was sent to 2,663 recipients. Of these, 1,773 recipients opened the email (representing an open rate of around 67 per cent). 96 of these recipients followed the link to the project webpage embedded in the email, contributing 160 webpage views to the total mentioned above.

- 2.3.21 To advertise the consultation, adverts were published in the following local publications on 15 January 2026:
- Thurrock Gazette
 - East Anglian Daily Times
 - Eastern Daily Press
- 2.3.22 Copies are available in Appendix F, Figures F14–16. These publications were selected as their coverage areas include the location of Change Request 1 (Bulphan).
- 2.3.23 Notices were also placed in the titles listed in 2.3.21 as well as the Essex Chronicle. The advert was not included in the Essex Chronicle, even though a notice was submitted, as the change was small and did not affect areas of the route within the Essex Chronicle’s coverage. Further information about notices can be found in Section 2.4.
- 2.3.24 Relevant community forums were notified of the proposed change within their administrative boundaries and invited to provide feedback. Community forum secretaries were also offered digital briefings.
- 2.3.25 The targeted consultation was also highlighted in the project’s community newsletter, issued on 19 January, which was distributed to approximately 82,000 properties along the route of the scheme. A copy of the newsletter is available in Appendix F, Figure 21.

Consultation Materials

- 2.3.26 The Applicant produced materials to explain the proposed change and its implications, including:
- A consultation leaflet which provided details on Change Request 1 (Bulphan) and included figures showing the location of the proposed change (Appendix F, Figure F10)
 - An Environmental Implications of Change (EIC) document which provided information on the likely environmental effects associated with Change Request 1 (Bulphan) compared against the submitted Environmental Statement (ES) (Appendix F, Figure F11)
 - A feedback form (Appendix F, Figure F12)
- 2.3.27 Consultation materials were available through the below channels:
- Through the Document Library on the project website (www.nationalgrid.com/norwich-to-tilbury)
 - A pack of consultation materials was posted to properties within the identified consultation zone (as described in 2.3.11).
 - Copies were available at local inspection points listed below
 - The Basildon Centre, St Martin's Square, Basildon, SS14 1EE
 - Brentwood Library, New Road, Brentwood, CM14 4BP
 - Public information event at Bulphan Village Hall
 - On request from the Applicant.

- 2.3.28 All consultation materials directed recipients to the Norwich to Tilbury project website and contained contact details for how to request paper copies of the documents from the Applicant.

Consultation Event

- 2.3.29 The Applicant held a public information event specific to Change Request 1 (Bulphan) at Bulphan Village Hall on Wednesday 28 January 2026, between 11:00 am and 4:00 pm.
- 2.3.30 For the in-person public information event, the Applicant produced a set of display panels presenting the background to the Proposed Project, the needs case, and detailed information on the proposed change at Bulphan. The panels also included maps of the proposed change, an overview of potential environmental implications, and clear information on how attendees could provide feedback. Copies of the event panels were available on the project website (www.nationalgrid.com/norwich-to-tilbury) and are provided in Appendix F, Figure F19.

Consultation Webinar

- 2.3.31 The Applicant held a public webinar on Change Request 1 (Bulphan) hosted via Microsoft Teams, on Tuesday 3 February 2026, between 6:00 pm and 7:00 pm.
- 2.3.32 The webinar included a presentation and a question-and-answer session and a recording of the presentation was made available for playback on the project website (www.nationalgrid.com/norwich-to-tilbury).

2.4 Notices

- 2.4.1 The Applicant undertook a range of measures to raise awareness of the targeted consultation, including the publication of consultation notices in newspapers.
- 2.4.2 In this approach, the Applicant had regard to the ExA's advice [PD-008] and published notices for the targeted consultation beyond local publications. However, Regulation 8 of the CA Regulations is not engaged for the purposes of pre-application consultation regarding a change request. The Applicant will comply with Regulation 8 of the CA Regulations in the event that Proposed Change Application 1 is accepted. **Proposed Change Application 1: Overview Report – Change Request 1 (Bulphan) (document reference 9.5)** demonstrates how the CA Regulations could be complied with in the context of the remainder of the examination.
- 2.4.3 Consultation notices were published on 15 January and 22 January 2026 in the following local newspapers. These publications cover the proposed route for Norwich to Tilbury, including the location of Change Request 1 (Bulphan):
- Thurrock Gazette
 - Essex Chronicle
 - East Anglian Daily Times
 - Eastern Daily Press

- 2.4.4 On the 15 January, notices were also placed in the following national papers to ensure wider awareness and coverage of Change Request 1 (Bulphan).
- The Guardian
 - The London Gazette
- 2.4.5 The notices provided information about the proposed change and the targeted consultation, including how members of the public could access further information, view consultation materials on the Norwich to Tilbury project website, and submit feedback within the consultation period.
- 2.4.6 Copies of the notices are provided in Appendix G, Figures G1-G10.
- 2.4.7 Un-registered land notices were also placed at nine locations where there was unknown Persons with an Interest in Land (PILs).
- 2.4.8 A plan showing the location of the notices is provided in Appendix G, Figure G11.
- 2.4.9 Photos of the notices are provided in Appendix G, Figure G12.

2.5 Landowner engagement

- 2.5.1 To ensure targeted and relative communication with Persons with an Interest in Land (PILs), the Applicant identified three groups who received tailored communications:
- Category 1 includes owners, lessees, tenants (whatever the tenancy period) or occupiers of the land within Order Limits
 - Category 2 includes parties that have an interest in the land or who have the power to sell, convey or release the land within Order Limits
 - Category 3 includes parties that that the Applicant thinks that, if the order sought by the application were made and fully implemented, the person would or might be entitled to make a relevant claim for compensation under section 10 of the Compulsory Purchase Act 1965 and/or Part 1 of the Land Compensation Act 1973 and/or section 152(3) of the Act
- 2.5.2 Table 2.1 details the letters that were sent to landowners notifying them of the change and the enclosures sent with them.

Table 2.1 Landowner engagement

Letter summary	Enclosures
On 9 December 2025, the Applicant wrote to existing PILs who already held an interest within the Order Limits. These letters notified recipients of the intention to apply for a change to the Order Limits at Bulphan and sought consent for their land to be subject to compulsory acquisition powers. The letter also included an offer of a meeting to discuss the proposal with National Grid's Land Agent, Fisher German.	<ul style="list-style-type: none"> • Plan showing the current and proposed project boundary in the change area (Figure C9) • Compulsory Acquisition Consent Form (Figure C11) • Land Interest Questionnaire pack (Figure C12-C17) • Freepost envelope (Figure F13)

Letter summary	Enclosures
<p>A copy of the letter is available in Appendix C, Figure C1.</p>	
<p>On 9 December 2025, the Applicant also wrote to new PILs who did not previously have land within the Order Limits. The letter sought consent for their land to be subject to compulsory acquisition powers. The letter also included an offer of a meeting to discuss the proposal with National Grid's Land Agent, Fisher German.</p> <p>A copy of the letter is available in Appendix C, Figure C2.</p>	<ul style="list-style-type: none"> • Plan showing the current and proposed project boundary in the change area (Figure C9) • Compulsory Acquisition Consent Form (Figure C11) • Land Interest Questionnaire pack (Figure C12-C17) • Freepost envelope (Figure F13)
<p>On 14 January 2026, the Applicant wrote to Category 1 and 2 PILs, following up the introductory correspondence issued in December. These letters provided details on the targeted consultation, including how to submit feedback, access materials, and attend webinars or public events.</p> <p>A copy of this letter is available in Appendix C, Figure C3</p>	<ul style="list-style-type: none"> • Copy of the December introductory letter (Figure C1) • Plan showing the likely extent of the proposed change on the recipient's land interest (Figure C12) • Land Interest Questionnaire pack (Figure C12-C17) • Freepost envelope (Figure F13)
<p>The Applicant also wrote to Category 3 PILs on 14 January 2026. As these recipients had not received the December introductory letter, the January correspondence included a more detailed introduction to the proposed change.</p> <p>A copy of this letter is available in Appendix C, Figure C4</p>	<ul style="list-style-type: none"> • Land Interest Questionnaire pack (Figure C12-C17) • Freepost envelope (Figure F13)
<p>Also on 14 January, the Applicant issued consultation letters to existing PILs who already held an interest within the Order Limits who were identified as part of ongoing diligent inquiry following the December letters (2.5.3).</p> <p>A copy of this letter is available in Appendix C, Figure C5</p>	<ul style="list-style-type: none"> • Plan showing the current and proposed project boundary in the change area (Figure C9) • Compulsory Acquisition Consent Form (Figure C11) • Land Interest Questionnaire pack (Figure C12-C17) • Freepost envelope (Figure F13)
<p>Consultation letters were also issued on 14 January to newly identified PILs who had not been captured in the mail out on 9 December. new PILs who did not previously have land within the Order Limits who were identified as part of ongoing diligent inquiry following the December letters (2.5.4).</p> <p>A copy of this letter is available in Appendix C, Figure C6</p>	<ul style="list-style-type: none"> • Plan showing the current and proposed project boundary in the change area (Figure C9) • Compulsory Acquisition Consent Form (Figure C11) • Land Interest Questionnaire pack (Figure C12-C17) • Freepost envelope (Figure F13)

Letter summary**Enclosures**

Clarification letters were issued to PILs who were incorrectly informed in the January Letter (2.5.5) that they were Category 3 PILs only, despite previously receiving a Category 1 and 2 soft-notification letter in December. The follow-up correspondence clarified that these PILs are correctly identified as Category 1, 2 and 3. These PILs were still given a 28-day consultation period from when they received this letter, of which one PIL was given a two-day extension to the consultation deadline to ensure this (11:59 pm on 25 February).

A copy of this letter is available in Appendix C, Figure C7.

Clarification letters were also issued to PILs who were notified as Category 3 PILs in the January Letter (Letter 05) after having received a Category 1 and 2 soft-notification letter in December. The follow-up letter confirmed that these PILs are correctly identified as Category 1 and 2 only, and should not have been assigned to Category 3. These PILs were still given a 28-day consultation period from when they received this letter.

A copy of this letter is available in Appendix C, Figure C8.

3. Summary of Responses Received to Consultation

3.1 Overview

3.1.1 Responses to the targeted consultation on the proposed changes could be submitted in the following ways:

- By email to contact@n-t.nationalgrid.com
- By writing to FREEPOST N TO T
- By completing an online feedback questionnaire at nationalgrid.com/n-t

3.1.2 During this targeted consultation for Proposed Change Application 1, the Applicant also ran a parallel consultation on another Proposed Change Application (Proposed Change Application 2 (Little Bromley)).

3.1.3 During this period, the Applicant received 21 pieces of feedback containing general comments on the Project as a whole and which were not specifically related to either Proposed Change Application 1 or Proposed Change Application 2. As was made clear in the consultation materials, only feedback specifically relating to Proposed Change Application 1 has been responded to by the Applicant within this report. However, all general feedback received can be found in Appendix D. The Applicant's position on these wider themes and comments can be found in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**, and **8.8.1 Applicant's Comments on Written Representations [REP2-029]**.

3.1.4 The Applicant received 8 pieces of feedback specific to Proposed Change Application 1.

3.1.5 Of the feedback specific to Proposed Change Application 1, four were submitted via email, three were submitted via hard copy, and one was submitted using the online feedback form.

3.1.6 Copies of all feedback received, including feedback relevant to Proposed Change Application 1 and feedback containing general comments not specifically related to either proposed change application, can be found in Appendix D.

3.1.7 The following prescribed consultees as listed in Appendix A responded to confirm they have no further comments regarding the proposed change application, and request that their previous comments are considered.

- Civil Aviation Authority
- Forestry Commission
- Historic England
- National Highways
- Norfolk County Council
- Norfolk County Council

- Office of Rail and Road
 - The Mining Remediation Authority
 - UK Health Security Agency.
- 3.1.8 The Applicant has addressed all feedback received during previous consultations in **5.1 Consultation Report [APP-066]**, submitted as part of the application for development consent. Recent comments made through the examination have been addressed in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]** and **8.8.1 Applicant's Comments on Written Representations [REP2-029]**. The Applicant's responses to these points are not repeated within this report.
- 3.1.9 The following prescribed consultees provided feedback specific to Proposed Change Application 1. This feedback can be found in Appendix D.
- Thurrock Council
 - National Gas Transmission.
- 3.1.10 Table 3.1 sets out the Applicant's responses to all feedback received relevant to Proposed Change Application 1. As stated in 3.1.3, Table 3.1 does not include responses to any general comments on the Project that were not directly relevant to the proposed change.

Table 3.1 The Applicant's response to targeted consultation feedback

Feedback summary	The Applicant's response
Concerns about disruption to residents from the use of Primrose Gate, Bulphan as an access route.	<p>Commitment reference AS03 set out in 7.2 Outline Code of Construction Practice (CoCP) [REP2-014] covers how the Applicant will ensure access is maintained through the construction phase to all residential, commercial, community and agricultural land uses. Specific discussions with the landowner would be undertaken by the Applicant and the delivery Contractor for the works prior and during construction to manage access and minimise disruption during the mitigation works, with a not significant effect anticipated.</p> <p>During construction, the increase in traffic flows during the peak activity on the Primary Access Routes and the findings of the assessment are not expected to change from those presented in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. Therefore, the effects will remain not significant. During operation (and maintenance) there will not be any significant effects associated to traffic and transport.</p>
Concerns about the suitability of Primrose Gate, Bulphan as an access route due to width and ability to accommodate HGVs. Suggestion of alternative access via the	The Applicant (and BPA) has assessed the proposed access route and is content that it satisfies the requirements needed to deliver the mitigation works. It is not anticipated that any HGVs will be required to use the gate.

Feedback summary**The Applicant's response**

rear of the property, to the left of Primrose Gate.

Concern that the Noke Hall Farm access track is unsuitable for large vehicles and machinery, and the electric security gate must remain closed and locked at all times.

The Applicant (and BPA) is confident that vehicles and plant for this portion of the works can be kept to a minimum such that the proposed access route will be suitable. We do not envisage any vehicles larger than typical farm plant will be required. In a worst case, if plant, e.g. a 6-tonne tracked digger, was to be delivered by HGV, then it could be unloaded at the mouth of the track and driven up the track under its own power.

The Applicant will work with the landowner to meet their security requirements.

Commitment reference AS03 set out in **7.2 Outline Code of Construction Practice [REP2-014]** covers how the Applicant will ensure access is maintained through the construction phase to all residential, commercial, community and agricultural land uses. Specific discussions with the landowner would be undertaken by the Applicant and the delivery contractor for the works prior and during construction to manage access and minimise disruption during the mitigation works (this could include delivery of vehicles and equipment to the entrance and tracking along to the works if required), with a not significant effect anticipated.

Suggestion to use the Elmdale Garage route as an alternative access route.

The Applicant (and BPA) is confident that the Primrose Gate access is suitable for the required vehicles and plant required for this portion of the works; therefore, an alternative is not required to be considered.

Commitment reference AS03 set out in **7.2 Outline Code of Construction Practice [REP2-014]** covers how the Applicant will ensure access is maintained through the construction phase to all residential, commercial, community and agricultural land uses. Specific discussions with the landowner would be undertaken by the Applicant and the delivery contractor for the works prior and during construction to manage access and minimise disruption during the mitigation works, with a not significant effect anticipated.

Request that work only proceed in dry conditions due to wet fields, and that the access track must remain clean and free of mud at all times.

All the mitigation works would be delivered in accordance commitments in **7.2 Outline Code of Construction Practice [REP2-014]**.

Notably commitment references GG06, GG07, GG15, AS02 of **7.2 Outline Code of**

Feedback summary	The Applicant's response
	<p>Construction Practice [REP2-014] all relate to pre-works condition surveys and post works re-instatement to the same, improved or as agreed condition with the relevant landowner. The works once commenced would need to be delivered in a concurrent manner and therefore may not be able to be paused extensively for poor weather. As the works are delivered the Applicant and relevant contractor would continue to liaise with affected landowners regards progression of the works and any changes to programme as a result of the weather.</p>
<p>Concerns about impacts from HGVs including damage to roads, traffic incidents, pedestrian safety.</p>	<p>The scale and nature of the works and associated vehicle movements are considered to be de-minimus and of equivalent scale and nature to operational or maintenance activities, and of no material difference from routing farm vehicle movements. Therefore, the controls of 7.3 Outline Construction Management Plan [APP-309] are not considered to apply.</p>
<p>Concerns about cumulative impacts from construction for other infrastructure such as solar, data centres and housing.</p>	<p>A full list of cumulative developments considered within the cumulative effects assessment (construction for other infrastructure such as solar, data centres and housing) are detailed within the long list of other developments (6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]).</p> <p>The ES Addendum: Change Request 1 (document reference 9.11) states that the proposed design change would not alter the Project's interaction with other developments identified in 6.17 Environmental Statement Chapter 17 -: Cumulative Effects [APP-281], which include developments up to and including to 1 April 2025. In addition, a review has been undertaken prior to the submission of this Proposed Change Application to determine if the proposed change introduces interactions with any new developments identified post 1 April 2025. No new developments were identified.</p>
<p>Comment that excavation works could be required where the pipeline route crosses Doesgate Lane.</p>	<p>Where the pipeline route crosses Doesgate Lane, the works will stop and start in the fields on either side of the road, so no excavation of Doesgate Lane will be required. This is reflected by the order Limits shown in the Proposed Change Application Plans.</p>

Feedback summary	The Applicant's response
<p>Request that the Applicant includes the proposals in the Road Safety Audit process as part of the application process for additional haul road access points located on Doesgate Lane, Brentwood Road and North Hill.</p>	<p>The proposed four number access points are not for access to the haul road or for the construction of the proposed overhead line. These are existing access onto the public highway which have been selected to allow temporary access to undertake works on the existing BPA pipeline. The works as anticipated do not require physical modifications to the public highway to enable access.</p> <p>These works should take less than six months, and the expected duration of use for each temporary access will be less than this. Therefore, in line with DMRB GG 119 v2.0.1 Chapter 2 Applicability of Road Safety Audit, a Road Safety Audit will not be required. If the Contractor identifies the works will take longer than six months, they will be required to complete RSAs and seek LHA approval of these.</p>
<p>Recommendation that the Applicant demonstrates this change does not cause any new noise and vibration impacts within the Environmental Statement Addendum Report.</p>	<p>The proposed design change would not result in any changes to the outcome of the noise and vibration assessment. Therefore, following the implementation of mitigation measures set out in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] and 7.2 Outline CoCP Appendix F - Outline Noise and Vibration Management Plan [APP-306], there would be no change to the type or significance of effects during construction as a result of the proposed design change, when compared to 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]. Further details are set out in the Proposed Change Application 1: Addendum to Environmental Statement - Change Request 1 (Bulphan) (document reference 9.11).</p>
<p>Concern that the proposed change will expand the Order Limits and increase the effect on Feeder Main 05 – Braintree to Horndon.</p>	<p>The Applicant is aware of the asset noted. These assets are included within the site-specific detailed design ongoing with the consultee. The Applicant is seeking to agree the details of the interaction with the consultee.</p>
<p>Recommendation that electrical interference on pipelines must be mitigated primarily through a safe-by-design approach.</p>	<p>The Applicant acknowledges that primary mitigation must be through a safe-by-design approach. Our starting point is to avoid all buried pipelines and parallel routes in the first instance, however due to the relative direction of connections and pipelines and a need to potentially respond to other constraints, homes and environmental features some crossings are unavoidable. Any crossings are to be as perpendicular as possible. Then, OHL design parameters such as phase configuration, are</p>

Feedback summary	The Applicant's response
	leveraged to reduce or optimise impacts. Where impacts are unavoidable due to constraints and route destination, pipeline mitigation is suggested.
Where the Applicant intends to acquire land, extinguish rights, or interfere with any apparatus, appropriate protection and further discussion on the impact to apparatus and rights including adequate Protective Provisions will be required. Recommendation that pipeline interference would require adequate protective provisions and a Deed of Consent.	Standard protective provisions for the benefit of gas undertakers are included at Part 1 of Schedule 16 to the draft Development Consent Order. However, the Applicant remains in discussion with the consultee and is seeking to reach an agreement on bespoke protective provisions which would address the particular concerns raised.
Recommendation that the installation of physical mitigation on pipelines may not always be feasible within project timelines, and systems installed may not consistently perform as expected. Extensive mitigation infrastructure on pipelines may also restrict provider's ability to perform inspection and maintenance activities (including those at Above Ground Installations and associated CP systems), which carries ongoing safety, financial, legal and regulatory implications. For this reason, the installation of permanent monitoring facilities may be required alongside any mitigation measures to ensure regulatory and legal obligations are met.	The Applicant acknowledges the challenges associated with the installation and operation of AC mitigation. The Applicant is in discussions with the operators to develop detailed design specifications to meet the operators' requirements. This may include permanent monitoring facilities.
Recommendation that if overhead line commissioning surveys identify AC interference levels outside acceptable criteria, the operation of the assets must be reduced, limited, or curtailed in order to return interference to compliant levels until further mitigation can be implemented.	The Applicant acknowledges National Gas' position. The Applicant's contractor will coordinate with the operator during our commissioning phase to address any risks.
Concerns that relying solely on the installation of mitigation on pipelines is not considered an acceptable basis for granting approval to the works at this stage. Pipeline diversion may be required to ensure the continued safe operation of the network should the project proceed with the current design.	The mitigation proposed is based on a conservative set of modelling assumptions discussed and agreed with operators, both around the pipeline parameters and the proposed overhead line loadings. Noting that the AC corrosion processes occur over periods of months and years, the mitigation has been designed to account for the worst-case single circuit outage scenario to ensure the pipeline is protected under all possible loading configurations. The Applicant is confident that the mitigation proposed is proportionate to the

Feedback summary	The Applicant's response
<p>Requirement for operators to carry out their own independent specialist Electrical Impact Assessment and associated verification activities to ensure that risks to pipelines are assessed in accordance with the relevant industry standards and reduce the number of assumptions applied in modelling.</p>	<p>impacts envisaged, therefore diversion of existing pipeline assets has not been considered.</p> <p>The Applicant notes the respondent's feedback. The Applicant has engaged with pipeline operators throughout the AC interference assessment process who have had several opportunities to advise on suitable modelling inputs. The work has been undertaken following UKOPA guidance and industry best practice. The Alternate Current (AC) interference has been quantified through assessments and modelling shared with operators, all mitigation options have been and will continue to be considered in developing an acceptable solution in engagement with operators. The Applicant's technical experience with similar applications and discussions with industry experts would indicate that the preliminary results show that the order of magnitude of AC interference anticipated is in a range that can be successfully mitigated by conventional means and in line with relevant industry standards.</p>
<p>Requirement that pipelines remain accessible during and after completion of any works.</p>	<p>The Applicant will ensure that the consultee's pipelines are always accessible and will work with the consultee to coordinate Construction, Design and Management (CDM) working areas. If during construction a location is temporarily inaccessible, the Applicant will liaise with the consultee to restore access as soon as possible or provide alternative access.</p>
<p>Some work types have specific restrictions when being undertaken in the vicinity of gas assets and it is recommended that early consultation with the operator is carried out.</p>	<p>The Applicant notes the respondent's feedback and will continue to engage with the operator through detailed design and construction as per standard construction health and safety requirements, operator specific requirements and industry guidance. It is envisaged the operator will engage their own specialist contractor to undertake the mitigation works.</p>
<p>Recommendation that pipeline depth should be confirmed by a supervised trial hole investigation, with ground cover above the pipeline not to be reduced or increased.</p>	<p>The Applicant has conservatively assumed minimum pipeline cover depths when modelling AC impacts and mitigations. While no verification trial pits have been planned, the Applicant is in discussions with the operators and should opportunities for model validation works present, then these can be considered. Furthermore, the Applicant will request that the Contractor records cover depths during installation so that the models can be updated.</p>
<p>Recommendation that if any excavations are planned within a pipeline's easement,</p>	<p>The Applicant notes the respondent's feedback and will continue to engage with the operator</p>

Feedback summary	The Applicant's response
<p>or within 10 metres (whichever is higher), or within 10 metres of an Above Ground Installation (AGI), or if any embankment or dredging works are proposed, then the actual position and depth of the pipeline must be established on site in the presence of an operator's representative. Suggestion a safe working method must be agreed prior to any work taking place to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.</p>	<p>through detailed design and construction as per standard construction health and safety requirements, operator specific requirements and industry guidance. This will include adhering to any site-specific requirements when working in proximity to existing utility assets. It is envisaged the operator will engage their own specialist contractor to undertake the mitigation works.</p>
<p>Recommendation that any large installations which may result in a population increase in the vicinity of a high-pressure gas pipeline must comply with the HSE's Land Use Planning (LUP) methodology, and the HSE response should be submitted to the operator for review.</p>	<p>The Applicant notes the respondent's feedback. We do not expect that any of our works will result in a large population increase in any location close to gas pipelines.</p>
<p>Promoters should limit the routing of Overhead Lines (OHLs) parallel to buried pipelines as much as possible. Where crossing a pipeline with an OHL, the crossing angle should be as close to perpendicular as possible.</p>	<p>The Applicant acknowledges this design best practice and where it has been possible, this has been applied. However, due to combinations of additional constraints to routing, perpendicular crossings are not always possible, noting also that a balance is struck with the additional introduction of further angle pylons relative to the implications for mitigation requirements. Furthermore, due to the north to south alignment of the Project, parallelism with other north to south pipeline is unavoidable.</p>
<p>Recommendation that subject to compliance with the acceptable interference criteria defined in the relevant standards, installations may be constructed adjacent to pipelines but must never be located within the easement. NGT's pipelines may already be experiencing AC interference; in such cases, the level of acceptance for new developments will be restricted to ensure that existing interference levels are not increased beyond those permitted by the standards. The Applicant is reminded that NGT pipelines are protected under the Pipeline Safety Regulations, particularly Regulation 15 which provides "No person shall cause such damage to a pipeline as may give rise to a danger to persons"</p>	<p>The Applicant notes the respondent's feedback.</p>

4. Regard had to Responses Received and Conclusion

4.1 Summary

- 4.1.1 This Consultation Report has been submitted in accordance with Planning Inspectorate Guidance and the ExA's advice in its response letter [PD-008].
- 4.1.2 The Applicant considers that it has carried out adequate and meaningful engagement in line with the Planning Inspectorate Guidance and the ExA's advice, and that this engagement was proportionate to the nature and extent of the proposed changes included within Change Request 1 (Bulphan).
- 4.1.3 The Applicant will continue to engage with interested parties in respect of the proposed changes throughout the Examination process.

4.2 Response to issues raised

- 4.2.1 Table 3.1 sets out the Applicant's response to the issues raised by respondents to the targeted consultation completed between 19 January 2026 and 23 February 2026. Table 3.1 does not include responses to any general comments on the Project which were not directly relevant to the targeted consultation. The Applicant has already provided responses on these wider themes and comments in **8.4.1 Applicant's Comments on Relevant Representations [REP1-132]**, and **8.8.1 Applicant's Comments on Written Representations [REP2-029]**.
- 4.2.2 Having had regard to the feedback received, the Applicant has concluded that no elements of Proposed Change Application¹ require amendment or adjustment. It is the Applicant's view that Change Request 1 (Bulphan) is necessary to avoid or minimise potential operational impacts of the Project on existing third-party infrastructure and to seek to address concerns raised by UKOP/BPA. This has been an important factor against which to evaluate feedback received. Therefore, the form of Proposed Change Application 1 remains unchanged from that which was consulted upon and as presented in 9.1 Notification of proposed change to DCO application – Change Request 1 (Bulphan) [AS-049].

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

Registered in England and Wales
No. 4031152
nationalgrid.com