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Norwich to Tilbury

Volume 9: Change Application

Document: 9.11 Proposed Change Application 1: Addendum to
Environmental Statement - Change Request 1 (Bulphan) (CA1)

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1. Environmental Statement Addendum – Change Request 1: Bulphan

1.1 Introduction

- 1.1.1 National Grid Electricity Transmission plc (the ‘Applicant’) submitted its application for development consent for Norwich to Tilbury (the ‘Project’) in August 2025. The application was accepted for Examination by the Planning Inspectorate on 26 September 2025. The Examination of the Project commenced on 10 February 2026 and is expected to close on 10 August 2026.
- 1.1.2 The Project comprises reinforcement of the transmission network between the existing Norwich Main Substation in Norfolk and Tilbury Substation in Essex, via Bramford Substation, the new East Anglia Connection Node (EACN) Substation and the new Tilbury North Substation.
- 1.1.3 The Development Consent Order (DCO) application was accompanied by an Environmental Statement (ES) [APP-123 to APP-287, AS-026 and AS-068].
- 1.1.4 The application was also accompanied by a number of other environmental assessments and reports, namely:
- **5.3 Habitats Regulations Assessment [APP-082]**
 - **5.4 Statement of Statutory Nuisance [APP-083]**
 - **7.1 Biodiversity Net Gain Report [APP-299]**
 - **7.2 Outline Code of Construction Practice [APP-301 to APP-308, REP2-014 and REP2-016]**
 - **7.3 Outline Construction Traffic Management Plan [APP-309 to APP-320]**
 - **7.4 Outline Landscape and Ecological Management Plan [REP2-018]**
 - **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**
 - **7.6 Outline Public Rights of Way Management Plan [APP-229]**
 - **7.9 Flood Risk Assessment [APP-331]**
 - **7.10 Water Framework Directive Assessment [APP-332]**
 - **7.11 Transport Assessment [APP-333 to APP-342].**

1.2 Proposed Design Change Application

- 1.2.1 While the application has been submitted and accepted for Examination, the Applicant has continued to undertake technical work, along with engagement with stakeholders. As a result of this work, the Applicant submitted a notification to the Examining Authority (ExA) on 12 December 2025 of its intention to make two proposed design changes to the DCO application:

- Bulphan: Change to Third Party Access and Works (Change Request 1) **[AS-049]**
- Little Bromley: Change to the EACN access (Change Request 2) **[AS-050]**.

1.2.2 The proposed design changes apply to two discrete geographical areas of the Project which do not substantially alter the Project as a whole. Each of the proposed design changes 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 and land uses.

1.2.3 This addendum has been submitted to support Change Request 1 (Bulphan). This document reviews the proposed design change to the Project and considers whether it would result in new or different likely significant environmental effects compared to those reported within the ES **[APP-123 to APP-287, AS-026 and AS-068]**. It also considers whether the conclusions of other relevant assessments, as listed in Paragraph 1.1.4, would change as a result of the proposed design change to the Project and whether any of the control documents included in Volume 7 are required to be updated.

1.2.4 In parallel to the submission of Proposed Change Application 1, the Applicant has also submitted a separate application (Proposed Change Application 2) for 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.

1.3 Description of the Proposed Design Change

1.3.1 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 (see Figures CR1.1, CR1.2 and CR1.3 in Appendix D). This proposed design change responds to feedback concerning accelerated corrosion on existing buried metallic services received from the British Pipeline Agency (BPA) Ltd who act as the agent for the owner, United Kingdom Oil Pipelines (UKOP) Limited.

1.3.2 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. The pipeline, which forms part of the national fuel infrastructure network, is operated by the BPA who act as agent for the owner UKOP.

1.3.3 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 (underground installation of anti-corrosion earthing strips) to be carried out in respect of the existing Thames to Buncefield Multifuel Pipeline.

1.3.4 The proposed design change includes:

- The installation, along approximately 2,700 m of affected pipeline, of anti-corrosion earthing strips running in parallel with the existing BPA pipeline
- Two temporary construction compounds to facilitate delivery works. These compounds would largely be used for material and equipment storage along with welfare facilities
- Test posts on field boundaries approximately 400 mm to 1,200 mm in height.

- 1.3.5 Access is assumed to be along existing field accesses and trackway with a width of 3 m may be used if required.
- 1.3.6 The anti-corrosion earthing strips are proposed to be buried at the same depth as the pipeline. At hedgerows, electrical cables would be buried below ground, to connect each side of the anti-corrosion earthing strip to the test post. Depth and location would be adjusted on site to reduce damage to hedgerows.
- 1.3.7 Works to install the anti-corrosion earthing strips are anticipated to take between five to six months to complete (including initial mobilisation activities). It is assumed that traffic movements associated with those works would include:
- Up to two excavators to be dropped off at the start of installation and picked up at the end of construction
 - Up to two welfare vans every day
 - One Supervisor's 4x4 vehicle every day
 - Delivery of materials to site on a Heavy Goods Vehicle (HGV) (one per week)
 - One additional 4x4 vehicle every day.
- 1.3.8 Following construction, land within the 20 m working swathe would be reinstated and returned to its former use. There would also be certain permanent restrictions on planting (including the depth of agricultural operations which would be limited to a maximum of 600 mm below finished ground level).
- 1.3.9 The proposed change is shown on the figures in **Appendix A of Proposed Change Application 1: Overview Report (Change Request 1) (Bulphan) [document reference 9.5]** and plans within **Proposed Change Application 1: Book of Plans – Change Request 1 (Bulphan) [document reference 9.13]**.

1.4 Review of the Environmental Assessment

- 1.4.1 A review of whether the proposed design change is likely to result in new or different likely significant environmental effects, compared to those reported within the ES **[APP-123 to APP-287, AS-026 and AS-068]**, has been undertaken across all environmental topic chapters. The review has also looked at whether the conclusions set out in other relevant assessments, as listed in Section 1, would change as a result of the proposed design change. The results of this review are set out in Tables 1.1 and 1.2.
- 1.4.2 Factors which have been considered when undertaking the review of the proposed design change for each environmental topic chapter reported within the ES **[APP-123 to APP-28, AS-026 and AS-068]** include:
- Whether the proposed design change increases or decreases the Order Limits
 - Whether the proposed design change results in any amendments to the key components of the Project e.g. location of permanent infrastructure
 - Whether the proposed design change introduces any new receptors which should be considered within the assessment or alters likely impacts on existing receptors
 - Whether the proposed design change could alter the proposed construction phase works or programme

- Whether the proposed design change could alter the proposed operation (and maintenance) of the Project.
- 1.4.3 Since the submission of the application for development consent in August 2025, the Government has published updated National Policy Statements in the form of Overarching National Policy Statement for Energy (EN-1), National Policy Statement for Renewable Energy (EN-3) and National Policy Statement for Electricity Networks (EN-5) in December 2025. The DCO application was accepted for examination before these NPSs were amended, therefore the Project will still be subject to examination pursuant to the 2024 versions as reported in the ES **[APP-123 to APP-287, AS-026 and AS-068]** and **5.6 Planning Statement [APP-085]**.
- 1.4.4 The revised EN-1, EN-3 and EN-5 reiterate the government's commitment to the Clean Power Action Plan 2030, which aims for at least 95% of the UK's electricity generation to come from clean sources by 2030 and emphasises the urgency of developing Critical National Priority (CNP) and low-carbon infrastructure, thereby supporting the need case established in the ES **[APP-123 to APP-287, AS-026 and AS-068]**.
- 1.4.5 The revised EN-1 and EN-5 maintain the assessment principles and generic impact considerations outlined in the 2024 versions of EN-1 and EN-5, ensuring continuity in evaluating environmental effects. They also introduce enhanced guidance on biodiversity, flood risk, and climate resilience and the mitigation hierarchy.
- 1.4.6 The proposed design change does not alter the content of the information relating to the development of the Project design and the main alternatives considered as set out within **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**. The proposed design change presents a further iteration of the Project following further technical work and ongoing engagement with stakeholders.
- 1.4.7 The proposed design change is also not considered to alter the scope of the Environmental Impact Assessment (EIA) undertaken as set out in **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]**.
- 1.4.8 Targeted Consultation on the proposed design change ran between 19 January 2026 and 23 February 2026. An Environmental Implications of Change (EIC) document was made available as part of the consultation documents. The EIC can be found on the Project website. Since the close of the consultation feedback received has been reviewed and regard made to both feedback and the EIC in this addendum. Responses to comments received can be found **Proposed Change Application 1: Consultation Report - Change Request 1 (Bulphan) [document reference 9.9]**.
- 1.4.9 Table 1.1 provides a review of whether Change Request 1 would result in any new or different likely significant environmental effects compared to those reported within the ES **[APP-123 to APP-287, AS-026 and AS-068]** previously submitted, including updates to chapters following submission of the DCO application.

Table 1.1 Review of ES conclusions as a result of Change Request 1

Application Document Reference	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed design change
APP-138	6.6 Environmental Statement Chapter 6 – Agriculture and Soils	<p>The proposed design change would slightly increase the temporary disturbance to soils and the temporary loss of agricultural land during construction. However, following the implementation of mitigation measures set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] and 7.2 Outline Code of Construction Practice (CoCP) Appendix C - Outline Soil Resource Plan [APP-303] there would be no change to the type or significance of effects as a result of the proposed design change, when compared to 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138].</p> <p>During operation (and maintenance) there would be no change to the type or significance of effects as a result of the proposed design change, when compared to 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138], as all land would be reinstated to its former use following construction.</p>
APP-147	6.7 Environmental Statement Chapter 7 – Air Quality	<p>The proposed design change would not result in any changes to the outcome of the air quality assessment. The proposed design change would add a small number of additional dust sources and activities that are needed to construct the works. However, following the implementation of mitigation measures set out in 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147] and the 7.2 Outline CoCP Appendix D - Outline Dust Management Plan [APP-304], 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 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147].</p> <p>As set out in 6.19 Scoping Report [APP-296] and 6.20 Scoping Opinion [APP-297], the operation (and maintenance) phase of the Project would not result in any significant effects to air quality. The proposed design change would not alter the scope in 6.19 Scoping Report [APP-296] and 6.20 Scoping Opinion [APP-297], and therefore, has not been considered further.</p>
AS-026	6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity Chapter 8	<p>A walkover of the proposed design change area was undertaken in November 2025. Survey results are presented in Appendix A. The proposed design change would slightly increase the amount of habitat temporarily impacted in the short-term, because of the required excavation works. However, habitats along the existing pipeline are arable and of low ecological value, as presented on Figure CR1.4 - Ecology and Biodiversity - UK Habitat Survey Results Revision and</p>

Application Document Reference	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed design change
		<p>Figure CR1.5 - Ecology and Biodiversity - Linear Habitat Survey Results Revision in Appendix D. There would be no additional impacts to irreplaceable habitats or habitats of principal importance. Impacts to tree and hedgerows on field boundaries would be avoided as it is not proposed to excavate beneath, or within the root protection zones of these features. The proposed test posts at field boundaries as part of the design would not be expected to result in likely significant effects.</p> <p>Following implementation of mitigation measures set out in 7.4 Outline Landscape and Ecological Management Plan (LEMP) [REP2-018] and 7.2 Outline CoCP [REP2-014], there would be no change to the type or significance of effect during construction or operation (and maintenance) on habitat features as presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. The proposed design change would not cause significant impacts to any designated sites or protected species, given the distance from any designated feature and the small-scale and temporary nature of the works associated with the proposed design change. Overall, there would be no change to the type or significance of ecology and biodiversity effects during construction or operation (and maintenance) as a result of the proposed design change, when compared to 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026].</p>
APP-181	6.9 Environmental Statement Chapter 9 - Contaminated Land, Geology and Hydrogeology	<p>The proposed design change would result in the introduction of additional potential sources of contamination sites to the Order Limits, identified by Thurrock Council's dataset. However, these additions would not change the outcome of the overall risk assessment during construction or operation (and maintenance) set out in 6.9 Environmental Statement Chapter 9 - Contaminated Land, Geology and Hydrogeology [APP-181] and would result in a low risk to sensitive receptors. In addition, a further deregulated groundwater abstraction (ref: 8/3756/*G/0013) (see Figure CR1.8 in Appendix D) would be introduced to the study area. However, the abstraction is not located within the Order Limits and the Project proposals closest to the borehole would not be anticipated to have any impacts on groundwater quality, levels or flow and therefore impacts on the abstraction would be unlikely. Therefore, following the implementation of existing mitigation measures set out in 6.9 Environmental Statement Chapter 9 - Contaminated Land, Geology and Hydrogeology [APP-181] and 7.2 Outline CoCP [REP2-014], there would be no change to the type or significance of effects during construction or operation (and maintenance) as</p>

Application Document Reference	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed design change
APP-192	6.10 Environmental Statement Chapter 10 – Health and Wellbeing	<p>a result of the proposed design change, when compared to 6.9 Environmental Statement Chapter 9 - Contaminated Land, Geology and Hydrogeology [APP-181].</p> <p>A review of other environmental topics (i.e. air quality, noise and vibration, landscape and visual, socio-economics, recreation and tourism, and traffic and transport) has been undertaken to identify any new or different effects to those recorded in the ES [APP-123 to APP-287]. The review did not identify any new or different effects during construction or operation (and maintenance) to those reported in 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192], following the implementation of existing mitigation outlined in 7.2 Outline CoCP [REP2-014] and 7.6 Outline Public Rights of Way (PRoW) Management Plan [APP-329]. As such, the proposed design change would not result in any changes to the outcome of in 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192].</p>
AS-068	6.11 Environmental Statement Chapter 11 - Historic Environment	<p>A walkover of the proposed design change area was undertaken in November 2025. Survey results are presented in Appendix B. The assessment of the impact of the proposed design change on the historic environment has identified that all impacts would take place during construction. During operation (and maintenance), there would be no change to the conclusions of the historic environment assessment.</p> <p>The assessment of the impact of the proposed design change on the historic environment during the construction has identified potential impacts to four heritage assets; comprising a scheduled monument, a grade II listed building and two non-designated heritage assets. These assets are presented on Figure CR1.6 - Designated and Non-designated Heritage Assets Assessed in the Bulphan Environmental Statement Addendum in Appendix D. Impacts to the scheduled monument and grade II listed building would result from change within their settings.</p> <p>The Grade II medium value listed building ‘Great Malgraves’ (1337107) was previously not assessed as its setting does not extend to the wider Project Order Limits. However, its setting does extend to the proposed new Order Limits and due to the change in its setting, the magnitude of impact would be negligible adverse, resulting in a temporary negligible adverse significance of effect (not significant).</p> <p>The high value scheduled monument ‘Bulphan World War II bombing decoy, 850 m and 890 m south west of Doesgate Farm’ (1020998) is situated within the larger high value non-designated ‘WWII Bombing Decoy, “Bulphan”, Essex’ (8016).</p>

Application Document Reference	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed design change
		<p>The settings of these assets would be affected during construction but not to so great an extent as to increase the existing conclusions of assessment, which remain as temporary minor adverse significance of effect (not significant).</p> <p>A small proportion of the high value non-designated ‘WWII Bombing Decoy, “Bulphan”, Essex’ (8016) along with the low value Project mapped cropmark complex to the east of Bulphan (8164) would be physically impacted by the proposed design change. Due to the small proportion of the assets impacted, and as potentially only previously disturbed ground around the existing pipeline would be affected, this would not increase the existing conclusions of assessment, which remain as permanent minor adverse significance of effect (not significant) on 8016 and permanent negligible adverse significance of effect (not significant) on 8164.</p> <p>The proposed design change would not lead to any new or different significant effects during construction to heritage assets when compared to the results presented in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068].</p> <p>During operation (and maintenance) there would be no change to the type or significance of effects as a result of the proposed design change, when compared to 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], as all land would be reinstatement to its former use following construction.</p>
APP-221	6.12 Environmental Statement Chapter 12 – Hydrology, Land Drainage and Flood Risk.	<p>The proposed design change would not result in any changes to the water environment during construction or operation (and maintenance). The proposed design change would not require the crossing of any additional watercourses. Mitigation measures outlined in 6.12 Environmental Statement Chapter 12 - Hydrology, Land Drainage and Flood Risk [APP-221] and 7.2 Outline CoCP [REP2-014] would mitigate any potential effects caused by the construction, namely potential effects on water quality due to soil stripping and stockpiling. When compared to the design presented within 6.12 Environmental Statement Chapter 12 - Hydrology, Land Drainage and Flood Risk [APP-221], there would be no new or different likely significant effects during construction or operation (and maintenance) on the water environment as a result of the proposed design change.</p>
APP-228 APP-229 APP-232	6.13 Environmental Statement Chapter 13 -	<p>The proposed design change would slightly increase construction activity within Landscape Character Area (LCA) A1 Bulphan Fenland and LCA J1 Langdon Lower Hill Slopes. This would not result in any new or different significant effects</p>

Application Document Reference	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed design change
APP-236	Landscape and Visual	<p>on landscape character to those reported within 6.13.A2 Environmental Statement Appendix 13.2: Landscape Baseline and Assessment [APP-228].</p> <p>The proposed design change would slightly increase construction activity within Visual Receptor Area (VRA) H1 Bulphan and VRA H2 Horndon on the Hill. This would not result in any new or different significant effects on visual amenity to those reported within 6.13.A3 Environmental Statement Appendix 13.3: Visual Baseline and Assessment – Part 1 [APP-229].</p> <p>The additional construction activity would be visible from Viewpoint 8.02: Doesgate Lane, Bulphan (see Figure CR1.8 in Appendix D). It would increase the area of the view in which construction work would be visible. This would not result in any new or different significant effects on visual amenity to those reported within 6.13.A3 Environmental Statement Appendix 13.13: Visual Baseline and Assessment – Part 4 [APP-232].</p> <p>During operation (and maintenance) there would be no change to the type or significance of effects as a result of the proposed design change, when compared to 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], as all land would be reinstatement to its former use following construction.</p> <p>A walkover of the proposed design change area was undertaken in December 2025. Survey results are presented in Appendix C. The proposed design change would increase the total amount of arboricultural features potentially impacted. This increase is limited to low quality arboricultural features as presented on Figure CR1.7 - Arboriculture Impacts Plan, Change Request 1 in Appendix D. There are no anticipated impacts to veteran trees or high and moderate quality arboricultural features as a result of the proposed design change. The proposed design change would not result in any new or different significant effects during construction or operation (and maintenance) on arboricultural features to those reported within the 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236].</p>
APP-256	6.14 Environmental Statement Chapter 14 – Noise and Vibration	<p>The proposed design change would not result in any changes to the outcome of the noise and vibration assessment. The proposed design change would add a small number of additional noise sources and activities that are needed to construct the works.</p> <p>However, following the implementation of mitigation measures set out in 6.14 Environmental Statement Chapter 14 - Noise</p>

Application Document Reference	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed design change
		<p>and Vibration [APP-256] and the 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].</p> <p>As set out in 6.19 Scoping Report [APP-296] and 6.20 Scoping Opinion [APP-297], the operation (and maintenance) phase of the Project would not result in any new or different significant effects to noise and vibration. The proposed design change would not alter the scope in 6.19 Scoping Report [APP-296] and 6.20 Scoping Opinion [APP-297], and therefore, has not been considered further.</p>
APP-265 APP-266	6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism	<p>The proposed design change would likely increase the construction cost and construction employment. However, the number would be marginal.</p> <p>Given the proposed design change would be located beyond the Langdon Hills Golf Country Club and Hotel (see Figure CR1.8 in Appendix D), no direct access or land take would be anticipated from the business.</p> <p>The proposed design change would bring construction works closer to two receptors, Ye Olde Plough House and The Croft Chalets Bed and Breakfast (see Figure CR1.8 in Appendix D). Following the implementation of mitigation measures set out in commitment S03 of the 7.2 Outline CoCP [REP2-014] the proposed construction works would not affect direct access to the businesses. The proposed design change would not result in any changes to the outcome of the air quality or noise assessment. The construction works would likely be visible from the businesses; however, the proposed design change would not result in any new or different significance of effects as reported in 6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3 km Study Area [APP-266].</p> <p>An additional section of Footpath 91 would be affected during construction. However, following the implementation of mitigation measures set out in the 7.6 Outline PRow Management Plan [APP-329], no new effects are anticipated. During operation (and maintenance) there would be no change to the type or significance of effects as a result of the proposed design change, when compared to 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265], as all land would be reinstatement to its former use following construction.</p> <p>Therefore, the proposed design change would not result in any new or different significant effects during construction or</p>

Application Document Reference	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed design change
APP-271	6.16 Environmental Statement Chapter 16 - Traffic and Transport	<p>operation (and maintenance) on the local economy, local employment, businesses or recreational routes as reported in 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265].</p> <p>An additional section of Footpath 91 (see Figure CR1.8 in Appendix D) would be affected during construction of the proposed design change. This additional section of footpath would need to be temporarily managed during construction in a similar way to the existing mitigation measures for this footpath as set out in 7.6 Outline PRoW Management Plan [APP-329]. If this change is accepted, this additional mitigation would be outlined in an updated 7.6 Outline PRoW Management Plan [APP-329] proposed to be submitted at Deadline 4. Following the implementation of these mitigation measures, there would be no new effects compared to those reported in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271].</p> <p>In terms of construction traffic, the peak activity on associated Primary Access Routes (PARs) would not increase and the findings of the assessment in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] would remain not significant.</p> <p>As set out in 6.19 Scoping Report [APP-296] and 6.20 Scoping Opinion [APP-297], the operation (and maintenance) phase of the Project would not result in any significant effects to traffic and transport. The proposed design change would not alter the scope in 6.19 Scoping Report [APP-296] and 6.20 Scoping Opinion [APP-297], and therefore, has not been considered further.</p>
APP-281	6.17 Environmental Statement Chapter 17 -: Cumulative Effects	<p>Given there is no change to the assessed significance in the conclusions presented in each of the topics above, and there would be no change to the sources of intra-project effects (or in combination with Change Request 2: Little Bromley), the proposed design change would not alter the conclusions in terms of likely significant intra-project effects reported in 6.17 Environmental Statement Chapter 17 -: Cumulative Effects [APP-281].</p> <p>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 1 to determine if the proposed design change introduces interactions with any new developments identified post 1 April 2025. No new developments were identified.</p>

Application Document Reference	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed design change
		Therefore, the proposed design change would not alter the conclusions in terms of significant inter-project effects reported in 6.17 Environmental Statement Chapter 17 -: Cumulative Effects [APP-281] .

1.4.10 Table 1.2 provides a review of whether Change Request 1 would change the findings reported in other environmental assessments included within the DCO application.

Table 1.2 Review of other DCO application document assessment conclusions as a result of Change Request 1

Application Document Reference	Relevant DCO Application Document	Review of whether new or different conclusions would arise as a result of the proposed design change
APP-299	7.1 Biodiversity Net Gain Report	There would be no change to this document as a result of the proposed design change. A small amount of arable land and grassland would be removed on a temporary basis and reinstated within a few months with no effect on the calculations in 7.1 Biodiversity Net Gain Report . There would be no other impacts to habitats. The Main Works Contractor will update the Biodiversity Net Gain report following detailed design.
REP2-014	7.2 Outline Code of Construction Practice	There would be no change to this document as a result of the proposed design change.
APP-309	7.3 Outline Construction Management Plan	The scale and nature of the works and associated vehicle movements are considered to be de-minimis and of equivalent scale and nature to operational / maintenance activities. Therefore, the controls of 7.3 Outline Construction Management Plan [APP-309] are not considered to apply.
REP2-018	7.4 Outline Landscape and Ecological Management Plan	There would be no change to this document as a result of the proposed design change.
APP-328	7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation	There would be no change to this document as a result of the proposed design change.

Application Document Reference	Relevant DCO Application Document	Review of whether new or different conclusions would arise as a result of the proposed design change
APP-329	7.6 Outline PRow Management Plan	<p>The proposed design change would result in an additional crossing of Footpath 91 during construction. This additional section of footpath would need to be temporarily managed during construction in a similar way to the existing mitigation measures for this footpath as set out in 7.6 Outline PRow Management Plan [APP-329]. If this change is accepted, this additional mitigation would be outlined in an updated 7.6 Outline PRow Management Plan [APP-329] submitted at Deadline 4.</p>
APP-331	7.9 Flood Risk Assessment	<p>There would be no change to the conclusions of 7.9 Flood Risk Assessment [APP-331] as a result of the proposed design change. A small section of land within the proposed new Order Limits on the south bank of New Mardyke would be at high risk of fluvial flooding.</p> <p>Two of the proposed test posts (to the north of Doesgate Lane) would be located in Flood Zone 3 (see Figure CR1.8 in Appendix D), however, the proposed test posts are small enough to have no perceptible impact on floodplain storage or flow paths. There would be no temporary construction compounds located in this area.</p> <p>Parts of the proposed design change (including four test posts) would be located within areas at high risk of surface water flooding.</p> <p>As outlined in 7.9 Flood Risk Assessment [APP-331], locally higher risks of flooding to temporary works during the construction phase of the Project would be reduced through embedded and standard mitigation measures, resulting in a low residual risk.</p> <p>During operation, there would be low risk of fluvial flooding to the proposed design change works and there would be no increase in fluvial or surface water flood risk elsewhere.</p> <p>Therefore, it is concluded there would be no change to the findings of 7.9 Flood Risk Assessment [APP-331] as a result of the proposed design change.</p>
APP-332	7.10 Water Framework Directive	<p>The proposed design change is not located within the existing Zone of Interest for 7.10 Water Framework Directive (WFD) Assessment [APP-332]. The proposed design change would not interact with any new surface, transitional, or coastal WFD waterbodies that are not already screened into the assessment reported in 7.10 Water Framework Directive (WFD) Assessment [APP-332]. Therefore, there would be no new or different effects with regards to the impact on WFD waterbodies as a result of the proposed design change.</p>

Application Document Reference	Relevant DCO Application Document	Review of whether new or different conclusions would arise as a result of the proposed design change
APP-333	7.11 Transport Assessment	<p>There would be no change to the conclusions of 7.11 Transport Assessment [APP-333] as a result of the proposed design change. The proposed design change would result in an additional crossing of Footpath 91 during construction of the proposed design change. This additional section of footpath would need to be temporarily managed during construction in a similar way to the existing mitigation measures for this footpath as set out in 7.6 Outline PRow Management Plan [APP-329]. If this change is accepted, this additional mitigation would be outlined in an updated 7.6 Outline PRow Management Plan [APP-329] submitted at Deadline 4. Following the implementation of these mitigation measures, there would be no new effects compared to those reported in 7.11 Transport Assessment [APP-333]. In terms of construction traffic, the peak activity on associated Primary Access Routes (PARs) would not increase and the findings of the assessment in 7.11 Transport Assessment [APP-333] would not change.</p> <p>Overall, it is concluded there would be no change to the findings of 7.11 Transport Assessment [APP-333] as a result of the proposed design change.</p>

1.5 Conclusion

- 1.5.1 In summary, the proposed design change would not introduce new or different likely significant environmental effects compared to those reported in the ES **[APP-123 to APP-287, AS-026 and AS-068]**.
- 1.5.2 The proposed design change (either in isolation or in combination with Change Request 2: Little Bromley) would not 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]**. However, the proposed design change would result in updates to the following documents which would be submitted into the Examination at Deadline 4:
- **7.6 Outline PRow Management Plan [APP-329]**.
- 1.5.3 **9.7 Proposed Change Application 1: Schedule of Changes to DCO Application Document – Change Request 1 (Bulphan) (document reference 6.9)** provides a list of all documents that would be submitted into the Examination as a result of the proposed design change. The Flood Risk Assessment and the Transport Assessment would not be updated as although the Order Limits have been amended the conclusions of the documents would not change.

Abbreviations

Abbreviation	Full Reference
BPA	British Pipeline Agency
CoCP	Code of Construction Practice
CNP	Critical National Priority
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
EACN	East Anglia Connection Node
EIA	Environmental Impact Assessment
EN-1	Overarching National Policy Statement for Energy
EN-3	National Policy Statement for Renewable Energy
EN-5	National Policy Statement for Electricity Networks
ES	Environmental Statement
ExA	Examining Authority
ha	hectare
HGV	Heavy Goods Vehicle
HPI	Habitats of Principle Importance
km	kilometre
LCA	Landscape Character Area
LEMP	Landscape and Ecological Management Plan
NPS	National Policy Statement
PAR	Primary Access Route
PRF	Potential Roost Features
PRoW	Public Right of Way
UKHab	United Kingdom Habitat Classification
UKOP	United Kingdom Oil Pipeline
VRA	Visual Receptor Area
WFD	Water Framework Directive
ZoI	Zone of Influence

Glossary

Term	Description
Environmental Statement (ES)	The main output from the EIA process, an ES is the report required to accompany an application for development consent (under the Infrastructure Planning (EIA) Regulations 2017) to inform public and stakeholder consultation and the decision on whether a project should be allowed to proceed. The EIA Regulations set out specific requirements for the contents of an ES for Nationally Significant Infrastructure Projects.
Local Planning Authority	The public authority whose duty it is to carry out specific planning functions for a particular area.
Mitigation	The action of reducing the severity and magnitude of change (impact) to the environment. Measures to avoid, reduce, remedy or compensate for significant adverse effects.
Order Limits	The maximum extent of land within which the authorised development may take place.

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Appendix A. Ecology and Biodiversity Additional Baseline

Appendix A

Ecology and Biodiversity Additional Baseline

A.1 Introduction

A.1.1 This appendix details the changes to the Ecology and Biodiversity baseline as reported in the Ecology and Biodiversity assessment (**6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**) and **6.8.A1 ES Appendix 8.1 - Habitat Report [AS-028]** as a result of the proposed design change.

A.2 Brief and Objectives

A.2.1 No change to text set out in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity **[AS-026]**.

A.3 Study and Survey Area

A.3.1 Proposed design change has resulted in a change to the Order Limits, which as a result, has led to alterations to the Study Area and Survey Area for the Project with respect to Ecology and Biodiversity. The Survey Area comprises the land within the Order Limits. The Study Area includes land with certain search areas extending from the Order Limits, this is the Zone of Influence (ZoI) for the Project with respect to the various Ecology and Biodiversity receptors as identified in Table 8.2 in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**.

A.4 Relevant Legislation and Policy

A.4.1 No change to text set out in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity **[AS-026]**.

A.5 Methodology

A.5.1 Habitats within the proposed new Order Limits and a 50 m buffer were digitally mapped using APEM data obtained in April and May 2022. Habitats which fell outside the extent of APEM coverage were mapped using Ordnance Survey MasterMap data. The habitat classification followed the UK Habitat Classification, hereafter referred to as 'UKHab' (UKHab Ltd., 2023).

A.5.2 In November 2025, ground-truthing surveys of these mapped habitats were undertaken. These surveys followed the same methodology as that reported in Section 3.3 of **6.8.A1 ES Appendix 8.1 - Habitat Report [AS-028]**.

A.5.3 In parallel with the UKHab surveys, walkover surveys for legally protected species and species of conservation concern were also undertaken. This included a search for confirmatory signs of presence, as follows:

- Signs of badger *Meles meles* activity including setts, tracks, foraging signs and latrines

- Potential roosting sites for bats and barn owl *Tyto alba* from the ground (i.e. in suitable trees, or buildings)
- Signs of hazel dormouse *Muscardinus avellanarius* including nests and food caches
- Suitable habitat for otter *Lutra lutra* including potential holts and resting place.

A.5.4 The desk study and field survey data that was collected for the Project were also reviewed to inform this report. The methodologies for the surveys and desk studies are presented in the Technical Appendices that support **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**, i.e., **6.8.A1 to 6.8.A16 Environmental Statement Appendices 8.4 to 8.15 [AS-028; AS-030 to AS-045; APP-160 to APP-164; APP-167 to APP-170; APP-173 to APP-174; APP-177 and APP-180]**.

A.6 Notes and Limitations

- A.6.1 This report is based on desk study and field survey information that was available up to and including November 2025. Every effort has been made to obtain land access to the full Order Limits, but where access was not available a combination of the high-definition aerial imagery, past aerial imagery data available on Google (Google Earth, 2023) and surveys from vantage points were undertaken to overcome this limitation.
- A.6.2 The habitat survey was undertaken in November, which is outside the optimal botanical survey window, limiting the ability to identify herbaceous species. However, the survey area comprised arable land, managed grassland and hedgerows and so it was possible to confidently classify the habitats present.
- A.6.3 The survey comprised a habitat survey and an initial assessment of signs of use by faunal species together with a suitability assessment. Detailed surveys for protected species were not undertaken but none were considered necessary based on the results of the field survey, the habitats identified, the likely impacts of the proposed works and fact that targeted surveys were undertaken, where necessary, to inform the assessment of impacts for the Project.

A.7 Results

Overview

- A.7.1 This section provides the results of the desk study as well as the UKHab survey undertaken for the Project with respect to ancient woodland, Habitat of Principal Importance (HPI) and legally protected fauna which inform the Ecology and Biodiversity baseline for an assessment of effects in relation to the proposed design change.
- A.7.2 The results of the habitat survey are presented as on Figure CR1.4 - Ecology and Biodiversity - UK Habitat Survey Results Revision and Figure CR1.5 - Ecology and Biodiversity - Linear Habitat Survey Results Revision in Appendix D.
- A.7.3 Most of the land within the proposed new Order Limits comprised cropped arable farmland (cropland), with modified grassland fields. Some of the arable margins

supported other neutral grassland. Boundary features comprised hedgerows and drainage ditches.

Desk Study Results

- A.7.4 There is no change to what was reported in the desk studies that supported the Technical Appendices to inform **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. There are no new statutory or non-statutory designated sites or ancient woodlands brought into the ZoI and no new species have been identified that materially alter the baseline for assessment.

Field Survey Results

Protected Fauna

- A.7.5 No evidence of badger setting, otter holts, hazel dormouse, or trees with potential roost features (PRFs) for bats or barn owl were identified within the Survey Area. The recorded habitats had negligible to low habitat suitability to support other legally protected species or species of conservation concern.

Habitats

- A.7.6 No new, previously unreported, habitats were identified within the Survey Area. There has been a minor increase of 5.55 ha of land within the Order Limits as a result of the proposed design change.
- A.7.7 Most of the land within the proposed new Order Limits was cropland (62.88%) covering approximately 3.49 ha with some of the arable field margins also supporting other neutral grassland. Grassland fields supported modified grassland and other neutral grasslands. Boundary features comprised dry drainage ditches, dense shrub and hedgerows. Table A.1 provides further details of habitat types present within the area surveyed for the proposed design change and the total areas for the Project including this new area identified as the proposed new Order Limits, note that habitats that are present within the Project Order Limits but not recorded in the land affected by the proposed design change are not listed in the table as this habitat areas remain unchanged.

Table A.1 UKHab Areas (Change Request 1)

Broad Habitat	Specific Habitat	Area / Length within Change Request 1	Area / Length within the Proposed New Order Limits
Cropland	Cereal crops (UKHab Code: c1c)	0.77 ha	2206.20 ha
	Winter stubble (UKHab Code: c1c5)	2.72 ha	74.85 ha
Grassland	Modified grassland (UKHab Code: g4)	1.21 ha	281.04 ha
	Other neutral grassland (UKHab Code: g3c)	0.60 ha	312.42 ha
	Bramble scrub (UKHab Code: h3d)	0.01 ha	6.06 ha

Broad Habitat	Specific Habitat	Area / Length within Change Request 1	Area / Length within the Proposed New Order Limits
Heathland and Shrub	Mixed scrub (UKHab Code: h3h)	< 0.01 ha	No change (12.80 ha)
	Native hedgerow (UKHab Code: h2a)	0.06 km	40.91 km
	Native hedgerow - associated with bank or ditch (UKHab Code: h2a, 50)	0.02 km	18.00 km
	Native hedgerow with trees - associated with bank or ditch (UKHab code: h2a, 11, 50)	0.01 km	23.28 km
Urban	Built linear features (UKHab code: u1e)	0.01 ha	5.23 ha
	Developed land; sealed surface (UKHab Code: u1b)	0.22 ha	90.84 ha
Watercourse	Ditch (UKHab Code: r, 50)	0.02 km	40.38 ha
Woodland	Line of trees (UKHab Code: w, 33)	0.01 km	11.41 ha

A.7.8 The only HPI within the Survey Area was native hedgerow, but as there would be no hedgerows loss in relation to the proposed design change and no other impacts to these features, no assessment was undertaken with respect to the Hedgerows Regulations 1997.

A.8 Conclusion

A.8.1 There has been no significant change to the Ecology and Biodiversity baseline. Most of the land affected by the proposed design change comprises arable land of negligible value to ecology and biodiversity with small areas of grassland of low value and local importance to ecology and biodiversity. The only HPI present was native hedgerows which are of medium value and county importance to ecology and biodiversity, these features would not be impacted by the proposed works associated with the proposed design change. No additional constraints associated with fauna were identified. Implementation of the standard and additional mitigation measures identified in **7.2 Outline Code of Construction Practice [REP2-014]** and **7.4 Outline Landscape and Ecological Management Plan [REP2-018]** would ensure legal compliance and avoid/mitigate for any impacts.

Appendix B. Historic Environment Additional Baseline

Appendix B

Historic Environment Additional Baseline

B.1 Introduction

- B.1.1 This appendix details the changes to the Historic Environment baseline as reported in the Historic Environment assessment set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**, **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** as a result of the proposed design change.

B.2 Aims

- B.2.1 No change to text set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068].

B.3 Methodology

- B.3.1 No change to text set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068].

B.4 Location, Topography and Geology

- B.4.1 The proposed design change is located between Pylons TB239 and TB240 and follows a north-west/south-east aligned, 2.7 km long section of the Thames to Buncefield Multifuel Pipeline to the west of Langdon Hills Golf Club. The route of proposed design change crosses arable land from a high point of c. 37 m aOD at its south-eastern limit to a low point of c. 12 m aOD at its north-western limit. The intervening landscape undulates very slightly but on the whole slopes generally downhill from the south-east to the north-west. The solid geology underlying the proposed design change is comprised entirely of clays, silts and sands of the London Clay Formation. The superficial geology comprises Head deposits of clay, silt, sand and gravel with two small areas where no superficial deposits are recorded.

B.5 Historic Landscape Characterisation

- B.5.1 No change to text set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068].

B.6 Historic Environment Baseline

Prehistoric

- B.6.1 No prehistoric heritage assets would be impacted by the proposed design change.

Roman Period

- B.6.2 The Essex HER identifies the north/south route of a possible Roman road (**8005**) between Brentwood and Tilbury. The road follows the route of the A128 Brentwood Road and lies approximately 30 m to the west of the north-western limit of the proposed design change. As the asset follows the route of the A128 any possible below ground remains of the asset would likely have been destroyed. The asset is, therefore, of **negligible value**, and so is not considered further.

Early Medieval

- B.6.3 No early medieval heritage assets would be impacted by the proposed design change.

Medieval

- B.6.4 The following medieval Listed Buildings are included in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and fall within the Study Area of the proposed design change:

- Grade I Church of St Mary (**1111617**)
- Grade I Church of St Peter and Paul (**1337109**)
- Grade II* Church of St Mary and All Saints (**1337108**)
- Grade II Ongar Hall (**1337060**)
- Grade II Outbuildings Immediately (About 5 Metres) to the East of Arden Hall (**1337123**).

- B.6.5 For these assets, the proposed design change would not change the conclusions reached in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** or **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**.

Post Medieval

- B.6.6 The following post medieval Registered Park and Garden and Listed Buildings are included in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and fall within the Study Area of the proposed design change:

- The Grade II* registered park and garden Thorndon Hall (**1000314**)
- The Grade II Weatherboarded Barn at Lorkins Farm (**1146631**)
- The Grade II Weatherboarded Cartlodge at Lorkins Farm (**1337085**)
- The Grade II Timber Framed Barn at Ongar Hall (**1111650**)
- The Grade II Barn to North of Wyfields Farmhouse (**1111646**)
- The Grade II Wyfields Farmhouse (**1337057**)
- The Grade II Arden Hall (**1308529**)
- The Grade II Wrens Park (**1111588**)

- The Grade II The Parsonage House (**1244319**)
- The Grade II Hall Farm Cottage (**1147475**)
- The Grade II Langdon Hill Hall Farmhouse (**1111590**)
- The Grade II Doesgate Farmhouse (**1146666**)
- The Grade II Lower Dunton Hall (**1111583**)
- The Grade II Church of St Mary (**1122253**)
- The Grade II Dunton Hall (**1338380**)
- The Grade II Barnards (**1166226**).

- B.6.7 For these assets, the proposed design change would not change the conclusions reached in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** or **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**.
- B.6.8 The proposed design change would be located 210 m to the north-east of the **high value** Grade II* listed 'Old Plough House' (**1337059**) at the north-western extent of the works, and so notably closer to the asset than the Project Order Limits which is c. 1.3 km to the east. The historic setting of the former farm building has been eroded due to its change in use to a hotel and loss of associated farm buildings. Based on this **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** concluded that the setting of the Old Plough House was restricted to its grounds and the local village streets (**1337059**) and did not extend to the Order Limits. Reappraisal of the asset in relation to the increased proximity of the proposed design change concludes that the setting of the asset does not extend to the proposed design change, and so is not considered further.
- B.6.9 The proposed design change would be located 150 m north-east of **medium value** Grade II listed 'Garlesters' (**1111648**) at the north-western extent of the works. Garlesters (**1111648**) was scoped out at the beginning of the Project due to its restricted settlement location setting and so was not considered any further in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**. Reappraisal of the asset in relation to the increased proximity of the proposed design change concludes that the setting of the asset does not extend to the proposed design change, and so is not considered further.
- B.6.10 The proposed design change would be located 300 m north-west of the **medium value** Grade II listed 'Great Malgraves' (**1337107**) at the south-eastern extent of the works. **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** concluded that the setting of the Great Malgraves (**1337107**) does not extend to the Order Limits which is located c. 1.1 km to the west. The proposed design change would, however, bring the Project closer at c. 300 m to the north-west of the asset. The setting of Great Malgraves is informed by its location at the heart of a working farm complex. The setting is further informed by the asset's relationships with the non-listed buildings of the working farming complex, several of which are recorded on the first edition OS map of 1876. The surrounding agricultural landscape, which is linked to the farm complex by gates and trackways, also informs the setting of the asset. The setting of the asset makes a considerable contribution to the value of the asset, and as construction phase works of the proposed design change would be located within the asset's farmland, the setting of the asset extends to the proposed design change.

- B.6.11 The construction phase of the Project would alter the wider rural setting of the asset through the installation of anti-corrosion earthing strips running in parallel with the existing Thames to Buncefield Multifuel Pipeline. These works would introduce plant/vehicle noise and movement into the setting of the asset. The non-designated buildings, internal boundaries and mature tree cover within the farming complex would largely screen the Change Request from the asset and so the magnitude of impact is considered to be **negligible adverse**. The implementation of standard construction mitigation would benefit the historic environment but would not reduce the change in setting enough to reduce the impact. Therefore, there is likely to be a temporary **negligible adverse** significance of effect on the asset (**not significant**). During the operation (and maintenance) phase of the proposed design change the magnitude of impact prior to mitigation is considered to be **no change**. Therefore, there is likely to be a direct, permanent **neutral** significance of effect (**not significant**).
- B.6.12 The Essex HER identifies the site of a former 19th century farmstead Manor House Farm (**8006**) on the southern flank of Doesgate Land and c. 130 m west of the proposed design change. The asset is of **negligible value** having been destroyed between 2016 and 2018, and so is not considered further.
- B.6.13 The **low value** asset (**8164**) is a cropmark complex, located east of Bulphan. The construction phase would not result in the permanent and irreversible loss of any portion of the asset impacted by groundworks associated with the proposed design change. As a small proportion of the asset falls within the proposed design change and as potentially only previously disturbed ground around the existing pipeline would be affected, the magnitude of impact is considered to be **low adverse**. The implementation of archaeological mitigation, if appropriate, would reduce the impact to **negligible adverse**, resulting in a direct, permanent **negligible adverse** significance of effect (**not significant**) on the asset during construction.

Modern

- B.6.14 The **high value** scheduled monument 'Bulphan World War II bombing decoy, 850m and 890m south west of Doesgate Farm' (**1020998**) is located c. 220 m north of the mid-section of the proposed design change. The scheduled monument is situated within the larger **high value** non-designated 'WWII Bombing Decoy, "Bulphan", Essex' (**8016**), which is crossed north-west/south-east by the proposed design change. The Bulphan Decoy was constructed to replicate RAF Hornchurch c. 11 km to the west and thereby draw Luftwaffe bombing raids. The decoy was both a 'K' site, designed for daytime use, and a nighttime 'Q' site. During the day the decoy displayed grassed runways, sandbagged defence positions, ammunition dumps and plywood dummy aircraft among their simulations. At night the decoy had electric lighting illuminating two traversing 'runways', obstruction/recognition lights and moving 'headlamps'. The scheduled monument (**1020998**) comprises a below ground Stanton Shelter and Operations Block from where the decoy was controlled, and an above ground Accommodation Hut for the personnel. The HER monument (**8016**) covers the extent of the decoy airfield and includes some HER recorded cropmarks that indicate below ground elements may still survive. The wider Project would pass close to the assets in the neighbouring field to the east, whilst the proposed design change would cross the southern half of asset (**8016**).
- B.6.15 The setting of these two assets is shared, and it is informed by their interrelationship. The setting is further informed by the surrounding, open rural landscape, which

despite some development and some boundary loss, is similar to its wartime setting. This large open agricultural landscape with only scattered farm buildings was an appropriate location for the decoy being at some distance from any populous areas. The setting of the assets, therefore, makes a considerable contribution to their values, and it extends to the Project and the proposed design change.

- B.6.16 Both assets were previously assessed against the impact of the Project (**6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**) and it was concluded that for the setting of the assets, the construction phase would cause a low adverse magnitude of impact resulting in a direct, temporary minor adverse significance of effect on the assets (not significant). The assessment also concluded that there would be no change for below ground elements of the scheduled monument during the construction phase, whilst below ground elements of the HER monument (8016) have the potential to experience a negligible adverse magnitude of impact, resulting in a direct, permanent minor adverse (not significant) significance of effect.
- B.6.17 For the operation (and maintenance) phase the assessment concluded that the setting of assets (**1020998**) and (**8016**) would experience a **low adverse** magnitude of impact resulting in a direct, permanent **minor adverse** significant of effect on the assets (**not significant**).
- B.6.18 The construction phase of the proposed design change would alter the wider rural setting of the assets through the installation of anti-corrosion earthing strips running in parallel with the existing Thames to Buncefield Multifuel Pipeline. These works would introduce plant/vehicle noise and movement into the rural setting of the assets (**1020998**) and (**8016**), which contributes to their values, resulting in combination with the wider Project in a **low adverse** magnitude of impact. Therefore, the proposed design change, is likely to cause a direct, temporary **minor adverse** significance effect (**not significant**) on the assets during the construction phase.
- B.6.19 The construction phase of the proposed design change would result in the permanent and irreversible loss of any portion of the **high value** asset (**8016**) impacted by groundworks associated with the proposed design change. As a small proportion of asset (**8016**) falls within the proposed design change and as potentially only previously disturbed material above the existing pipeline would be affected, the magnitude of impact in combination with the wider Project is considered to be **low adverse**. The implementation of the archaeological mitigation, if appropriate, would reduce the impact to **negligible adverse**, resulting in a direct, permanent **minor adverse** significance of effect (**not significant**) on asset (**8016**).
- B.6.20 During the operation (and maintenance) phase of the proposed design change, the magnitude of impact would be **no change**. Therefore, there would be no change to the conclusions of assessment for the wider Project summarised above.
- B.6.21 The Essex HER identifies the site of a Second World War road barrier (**8004**) located on the northern flank of Doesgate Lane and c. 220 m west of the proposed design change. Nothing of this **negligible value** asset survives today, and so it is not considered further.

Walkover Survey

- B.6.22 The walkover survey of the proposed design change area was undertaken along the route of the proposed works to the Thames to Buncefield Multifuel Pipeline. This area covered nine accessible fields, which were mostly flat and primarily used for arable farming, pasture, and paddocks, with boundaries marked by hedgerows, treelines, ditches, and banks. Ongar Hall (**1337060**) was visible from the walkover area. No other known or previously unrecorded heritage assets were observed within the walkover area. Overall, the walkover confirmed the agricultural character of the area, with no visible above ground evidence for heritage assets within the walkover area.

B.7 Conclusion

- B.7.1 The review of additional baseline and existing baseline gathered to inform **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**, has identified one additional grade II listed building that would be adversely affected by the proposed design change, that was not previously affected by the Project during construction in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**.
- B.7.2 The Grade II medium value listed building 'Great Malgraves' (**1337107**) was previously not assessed as its setting does not extend to the wider Project Order Limits. However, its setting does extend to the proposed new Order Limits and due to the change in its setting, the magnitude of impact would be negligible adverse, resulting in a temporary negligible adverse significance of effect (not significant).
- B.7.3 The high value scheduled monument 'Bulphan World War II bombing decoy, 850 m and 890 m south west of Doesgate Farm' (**1020998**) is situated within the larger high value non-designated 'WWII Bombing Decoy, "Bulphan", Essex' (**8016**). The settings of these assets would be affected during construction but not to so great an extent as to increase the existing conclusions of assessment, which remain as temporary minor adverse significance of effect (not significant).
- B.7.4 A small proportion of the high value non-designated 'WWII Bombing Decoy, "Bulphan", Essex' (8016) along with the low value Project mapped cropmark complex to the east of Bulphan (8164) would be physically impacted by the proposed design change. Due to the small proportion of the assets impacted, and as potentially only previously disturbed ground around the existing pipeline would be affected, this would not increase the existing conclusions of assessment, which remain as permanent minor adverse significance of effect (not significant) on 8016 and permanent negligible adverse significance of effect (not significant) on 8164.
- B.7.5 The assessment during construction would be negligible or minor adverse significance of effects to heritage assets, which are not significant in EIA terms.
- B.7.6 The assessment has identified that all impacts would take place during construction. For the operation (and maintenance) there would be no change to the conclusions of the historic environment assessment (ref).

Appendix C. Arboriculture Additional Baseline

Appendix C

Arboriculture Additional Baseline

C.1 Introduction

- C.1.1 This appendix details the changes to the Arboriculture baseline as reported in **6.13 Environmental Statement Chapter 13: Landscape and Visual [APP-226]** and **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]** as a result of the proposed design change.

C.2 Scope of Report

- C.2.1 No change to text set out in **6.13.A6 Environmental Statement Appendix 13.6 Arboricultural Impact Assessment AIA [APP-236]**.

C.3 Study Area

- C.3.1 The proposed design change has resulted in a change to the extent Order Limits, which has changed the Study Area for the Project with respect to arboriculture. The arboricultural Study Area has been informed by the extent of Order Limits plus up to 30 m, in accordance with **6.19 Scoping Report [APP-296]** and **6.20 Scoping Opinion [APP-297]**.

C.4 Relevant Legislation, Policy and Guidance

- C.4.1 No change to text set out in **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]**.

C.5 Methodology

- C.5.1 Arboricultural features, defined as individual trees or groups, within the proposed new Order Limits were digitally mapped using APEM Ltd. data obtained in 2022. Where data from the digital aerial survey was not available, the position of arboricultural features has either been estimated using aerial photography or determined through on-site GPS / ground based surveys.
- C.5.2 Additional field-based surveys of arboricultural features within the proposed new Order Limits were undertaken in December 2025. This survey followed the same methodology as that reported in Annex A of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]**.

C.6 Notes and Limitations

- C.6.1 No change to text set out in **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]**.

C.7 Results

Overview

- C.7.1 This section provides the results of the desk study as well as the field-based survey undertaken for the Project with respect to Tree Preservation Orders, ancient woodland, traditional orchards, veteran trees and arboricultural features of high to moderate value (BS5827 category A and B) which inform the arboricultural baseline for an assessment of effects in relation to the proposed design change.
- C.7.2 The results of the field-based survey are presented as on Figure CR1.7 - Arboriculture Impacts Plan Change Request 1 in Appendix D.
- C.7.3 The study area was predominantly arable land with hedgerow boundaries. The land undulates gently to the west of the Langdon Hills Golf Club, whilst to the southeast it is mostly flat.

Desk Study Results

- C.7.4 There is no change to what was reported in the desk study in **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]**. There are no new ancient woodlands or Tree Preservation Orders within the Study Area.

Field-based Survey

- C.7.5 The survey resulted in an increase in the amount of low value (BS5837 category C and U) arboricultural features within the Study Area. The arboricultural features are predominantly hedgerows or groups of trees of mixed native species and are not anticipated to be affected by the construction works.

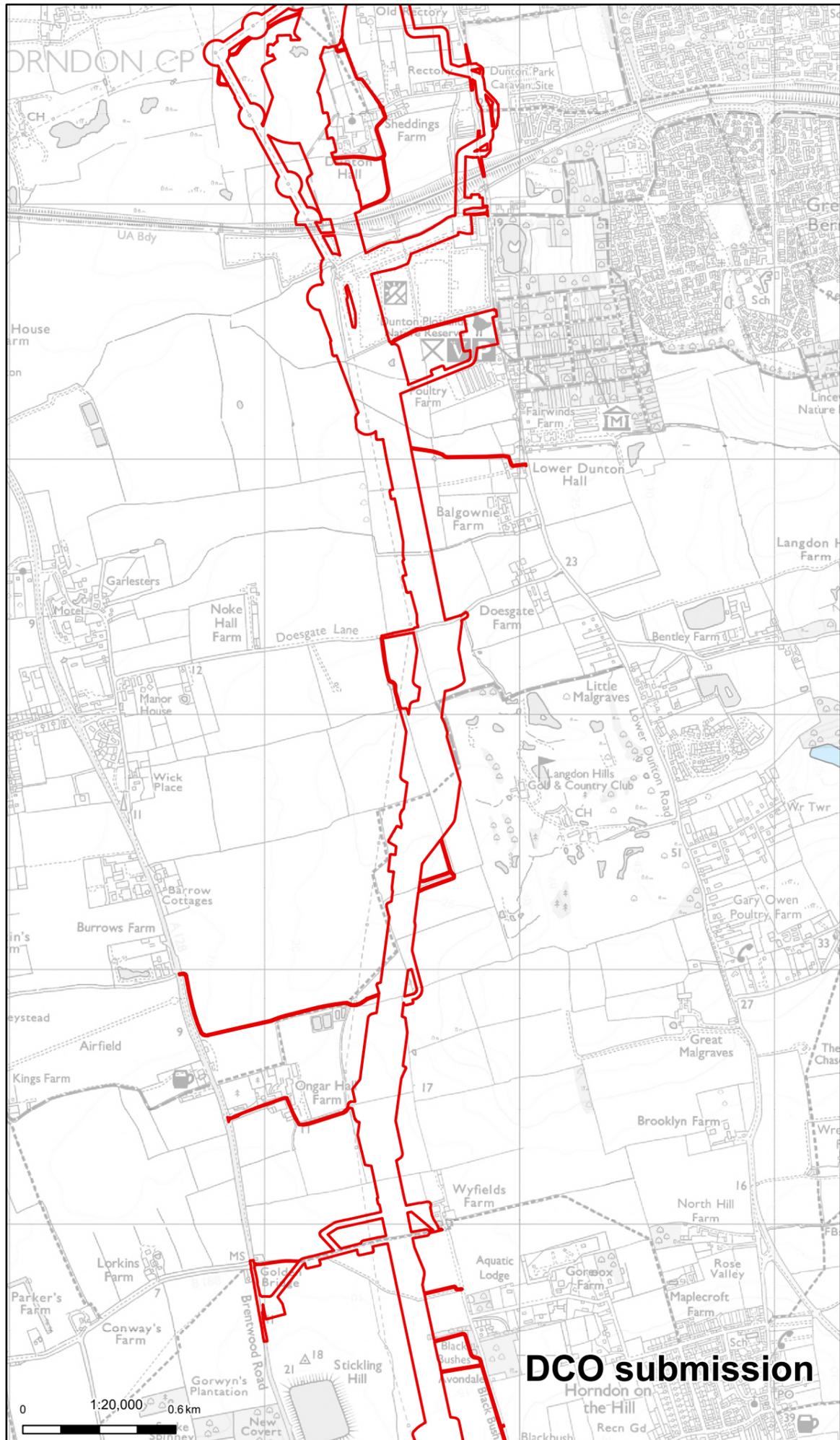
C.8 Conclusion

- C.8.1 There has been no significant change to the arboriculture baseline. The arboricultural features present features would not be impacted by the proposed works associated with the proposed design change. No additional constraints associated with the trees were identified.

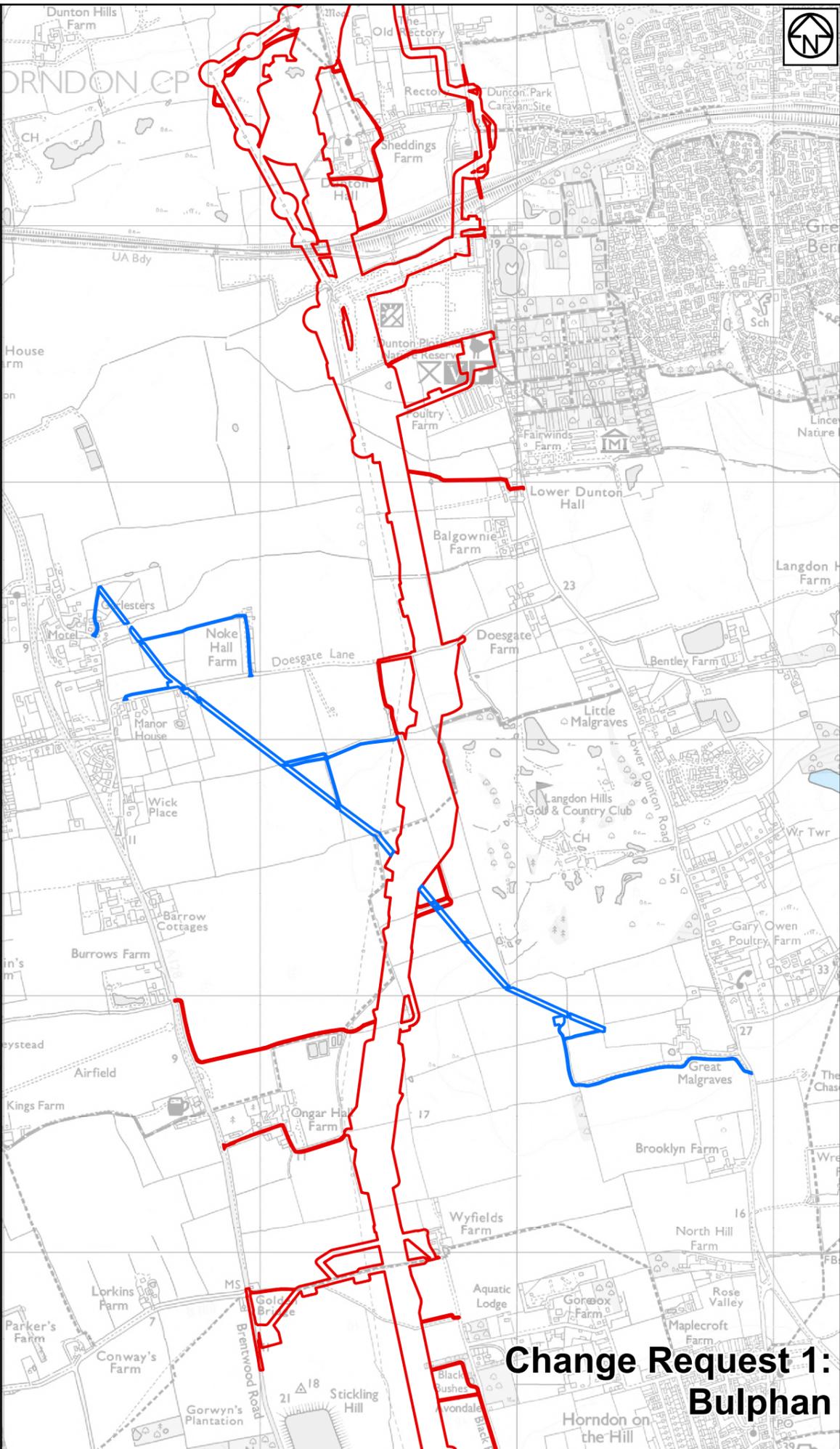
Appendix D.

Figures

Appendix D Figures



DCO submission

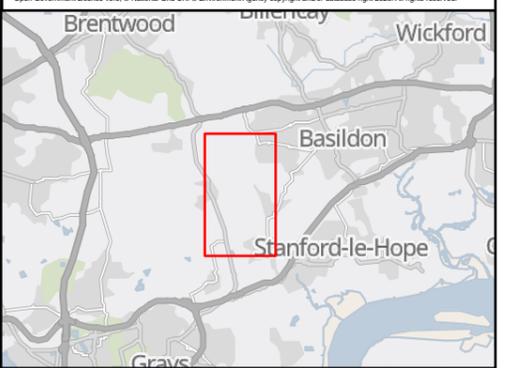


**Change Request 1:
Bulphan**



DCO Order Limits
Proposed New Order Limits

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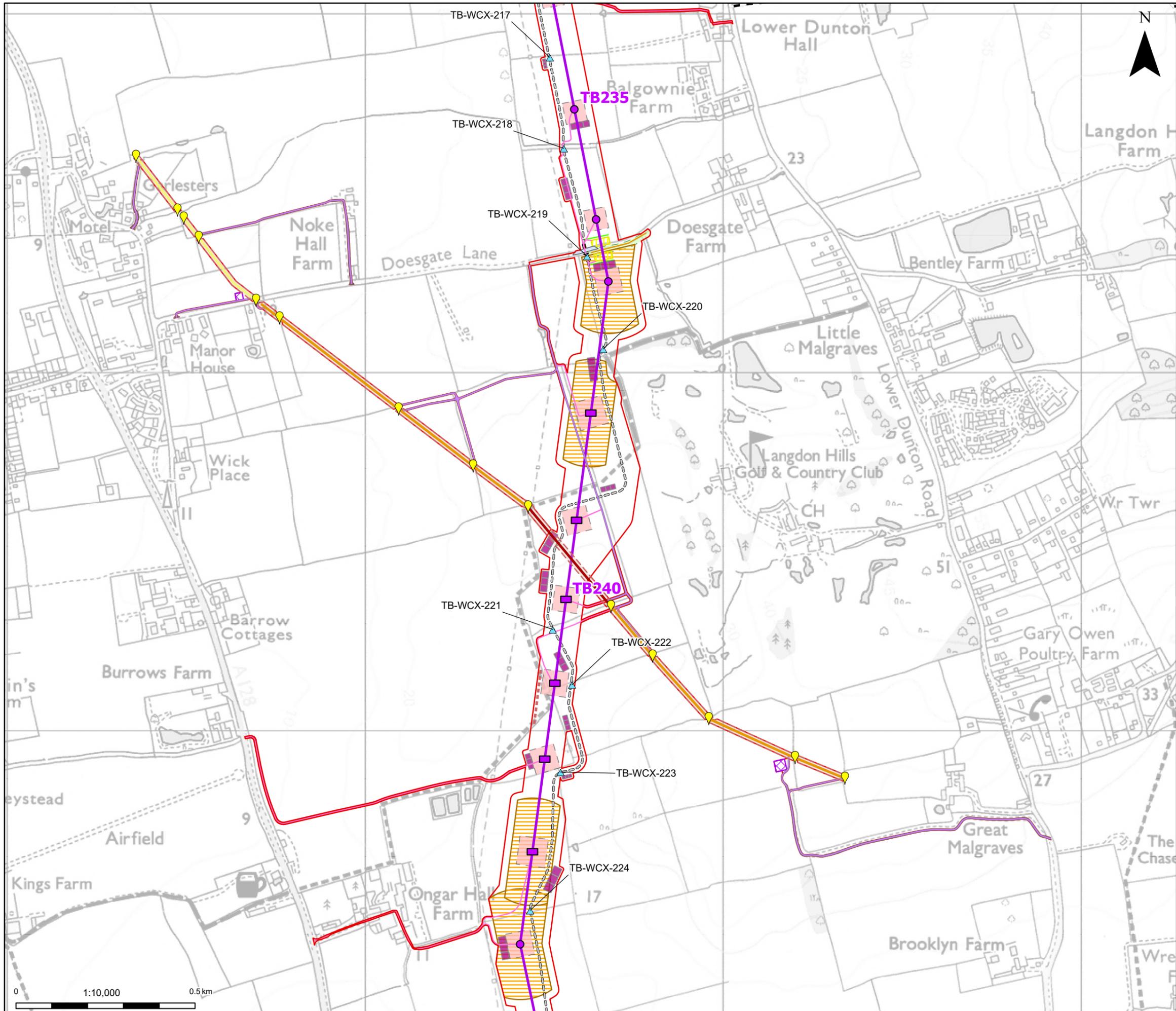
PROJECT:
nationalgrid Norwich to Tilbury

Title:
Figure CR1.1 - DCO and proposed new Order Limits - Change Request 1

Designed	C. Banks	Date	March 2026
Drawn	K. Fischer	Date	March 2026
Checked	A. Fell	Date	March 2026
Approved	K. Burrows	Date	March 2026
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Original Size:	A3	Grid:	OS
Suitability Code:	A2	Project Number:	10059280

Suitability Description:
Accepted as Concept Stage

Drawing Number:	10059280-ARC-EGN-ZZ-DR-ZZ-00874	Revision:	A
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Order limits
 - - - Project section line

Proposed permanent design details

- Proposed low height pylon location
- Proposed standard lattice pylon location
- Proposed overhead line alignment
- Proposed permanent access (no physical works)
- Proposed BT overhead line mitigation

Proposed temporary design details

- Proposed overhead line construction SuDS basin
- Proposed site access point
- Proposed temporary haul road
- Proposed overhead line crossing protection access route
- Proposed overhead line crossing protection work area
- Proposed pylon construction work area
- Proposed overhead line pulling location

Proposed BT overhead line mitigation work area

Proposed bellmouth stacking

Proposed PRoW diversions

Proposed overhead line access watercourse crossing - culvert

BPA AC Mitigation

- BPA Mitigation Connections
- BPA Mitigation Centreline
- Zinc Strips
- BPA Mitigation Work Area
- BPA Mitigation Access Buffer
- BPA Mitigation Temp Compounds

Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the alignment.

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PROJECT:
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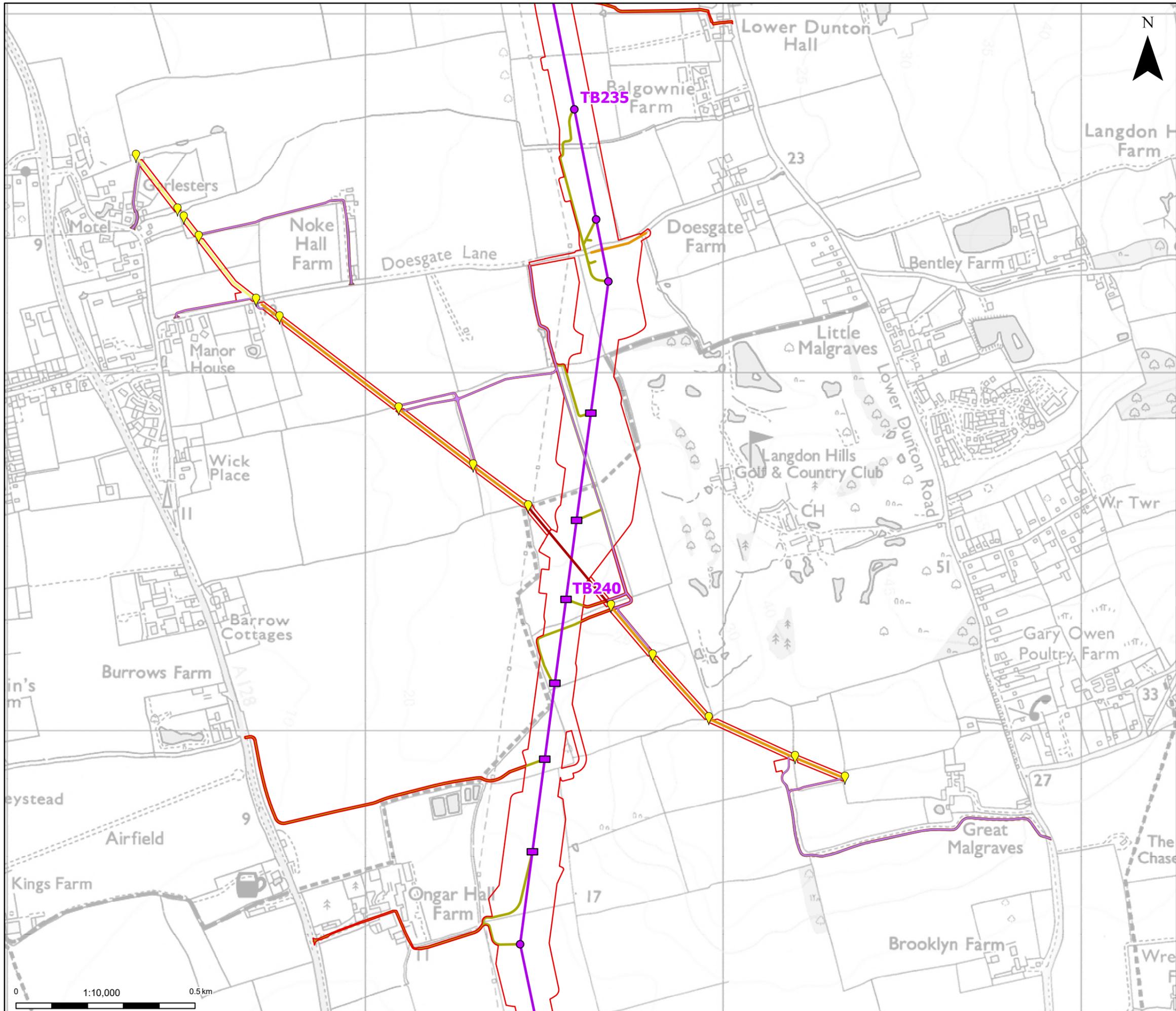
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Figure CR1.2 - Proposed Project Design - (Change Request 1)

Designed	C. Banks	Date	March 26
Drawn	S. Sarkar	Date	March 26
Checked	A. Fell	Date	March 26
Approved	K. Burrows	Date	March 26
Scale:	1:10,000	Datum:	AOD
Original Size:	A3	Grid:	OS
Suitability Code:	A2	Project Number:	10059280

Suitability Description:
 Accepted as Concept Stage

Drawing Number:
 10059280-ARC-EGN-ZZ-DR-ZZ-00900

Revision:
 A



- Order limits
 - Proposed permanent design details**
 - Proposed low height pylon location
 - Proposed standard lattice pylon location
 - Proposed overhead line alignment
 - Proposed permanent access (no physical works)
 - Proposed BT overhead line mitigation
 - BPA AC Mitigation**
 - BPA Mitigation Connections
 - BPA Mitigation Centreline**
 - Zinc Strips**
 - 8
 - 6
 - 2
 - BPA Mitigation Access
 - BPA Mitigation Access Buffer
- Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the alignment.

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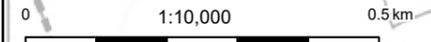
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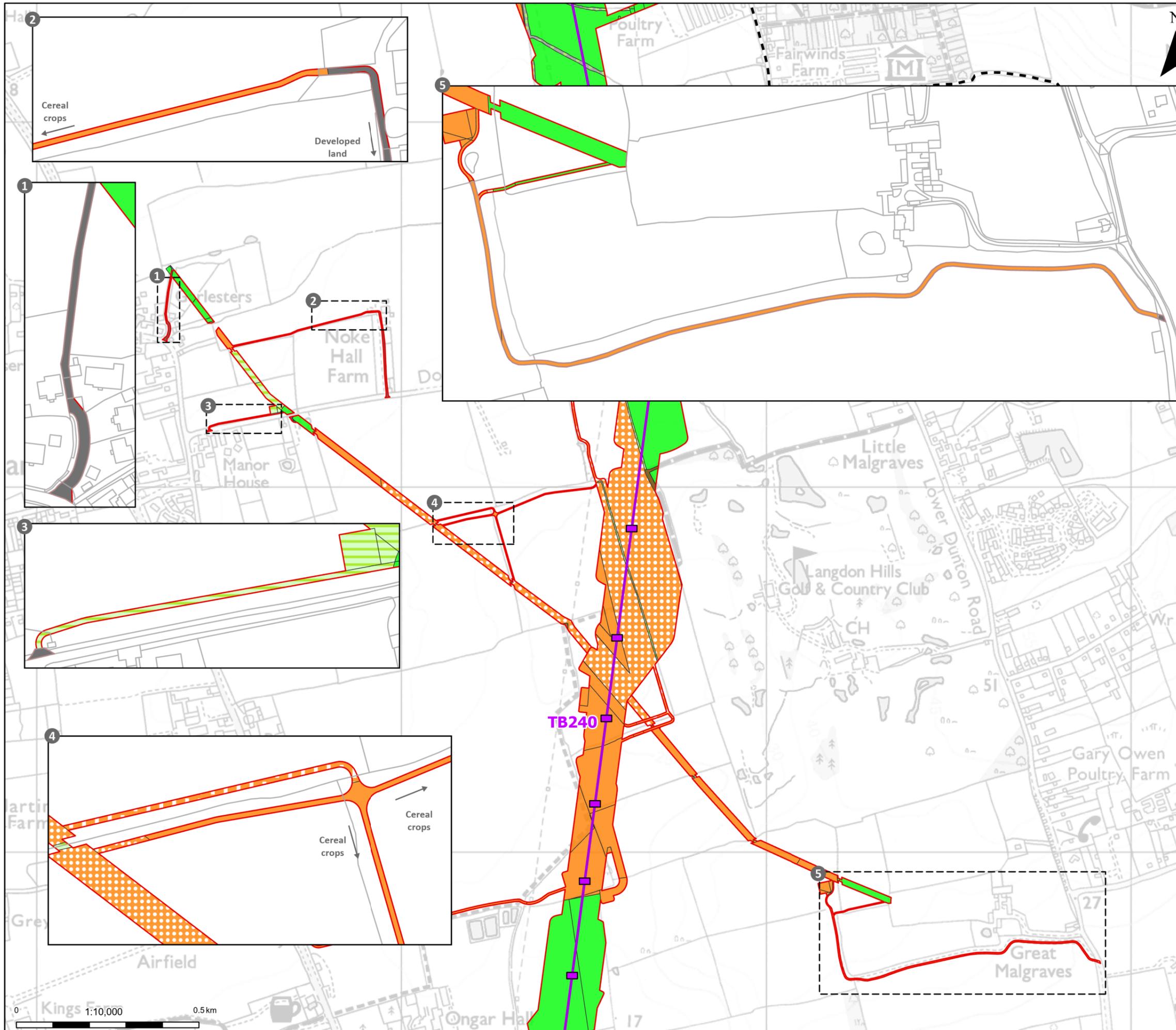
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Figure CR1.3 - Proposed Project Design - Permanent Features - (Change Request 1)

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Drawn	S. Sarkar	Date	March 26
Checked	A. Fell	Date	March 26
Approved	K. Burrows	Date	March 26
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Original Size:	A3	Grid:	OS
Suitability Code:	A2	Project Number:	10059280

Suitability Description:
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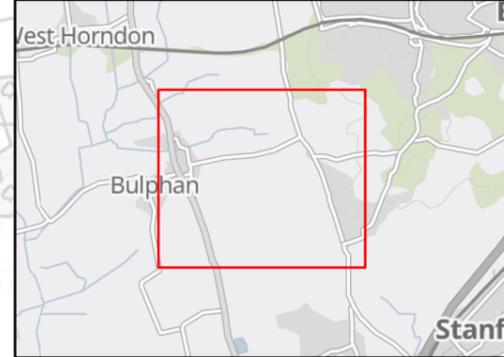
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- Order limits
- Project section line
- Proposed low height pylon location
- Proposed standard lattice pylon location
- Proposed overhead line alignment
- Cereal crops
- Non-cereal crops
- Winter stubble
- Modified grassland
- Other neutral grassland
- Bramble scrub
- Mixed scrub
- Built linear features
- Developed land; sealed surface
- Vegetated garden
- Tall forbs
- Watercourse footprint
- Lowland mixed deciduous woodland
- Other woodland; mixed

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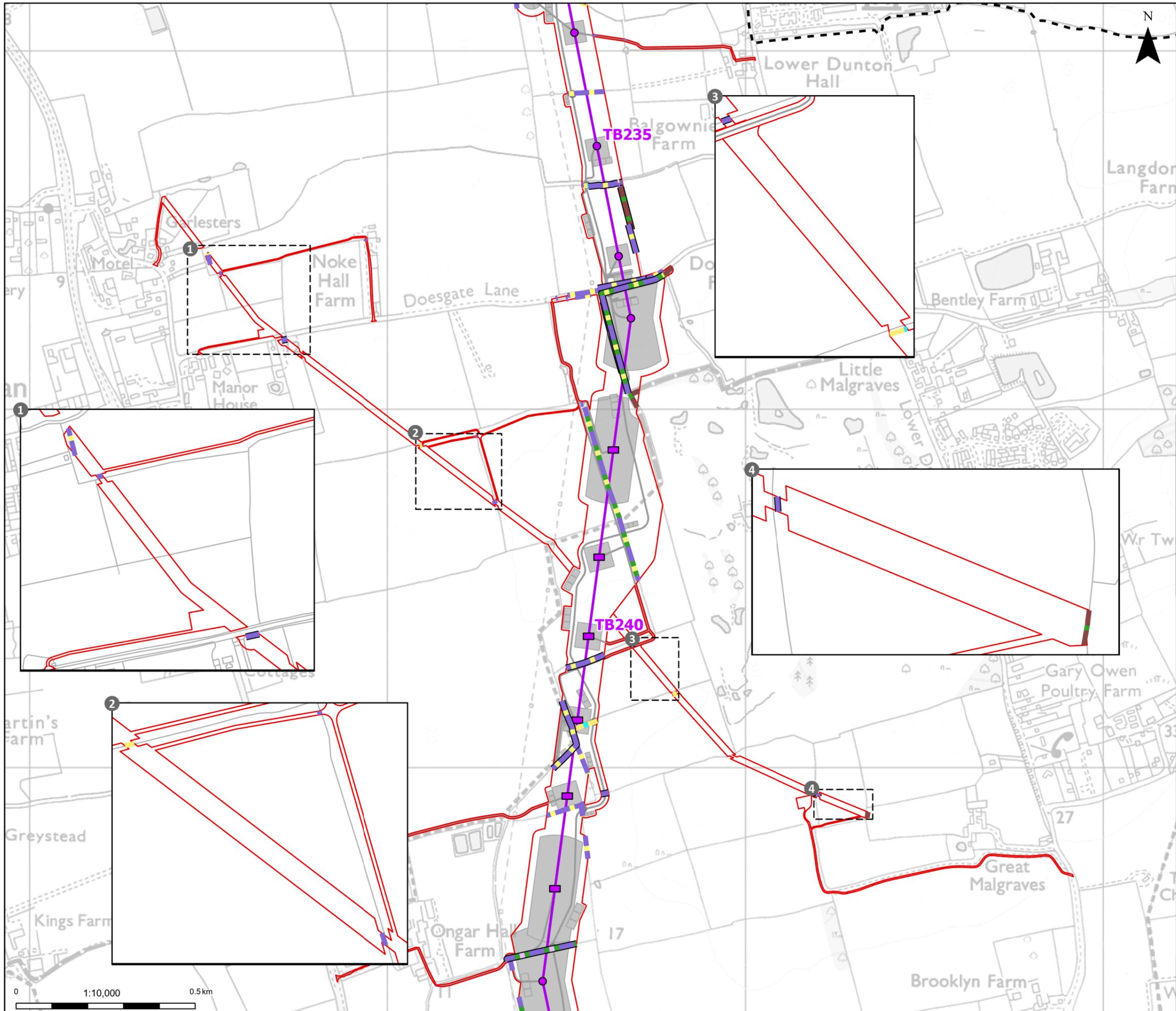
PROJECT:
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Title:
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Designed	C. Banks	Date	March 26
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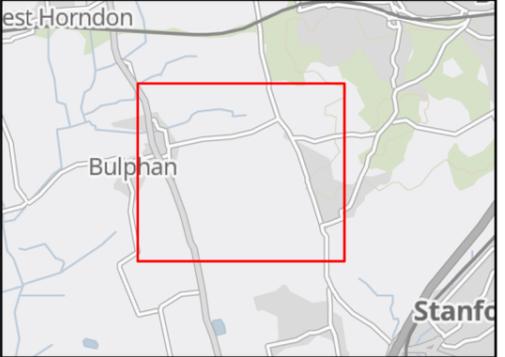
Suitability Description:
 Accepted as Concept Stage

Drawing Number:	10059280-ARC-EGN-ZZ-DR-ZZ-00884	Revision:	A
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- Order limits
- Project section line
- Proposed low height pylon location
- Proposed standard lattice pylon location
- Proposed overhead line alignment
- Other temporary and permanent construction and operational works
- Ditches
- Line of trees
- Line of trees - associated with bank or ditch
- Native hedgerow
- Native hedgerow - associated with bank or ditch
- Native hedgerow with trees
- Native hedgerow with trees - associated with bank or ditch
- Species-rich native hedgerow with trees
- Species-rich native hedgerow with trees - associated with bank or ditch

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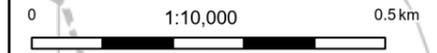
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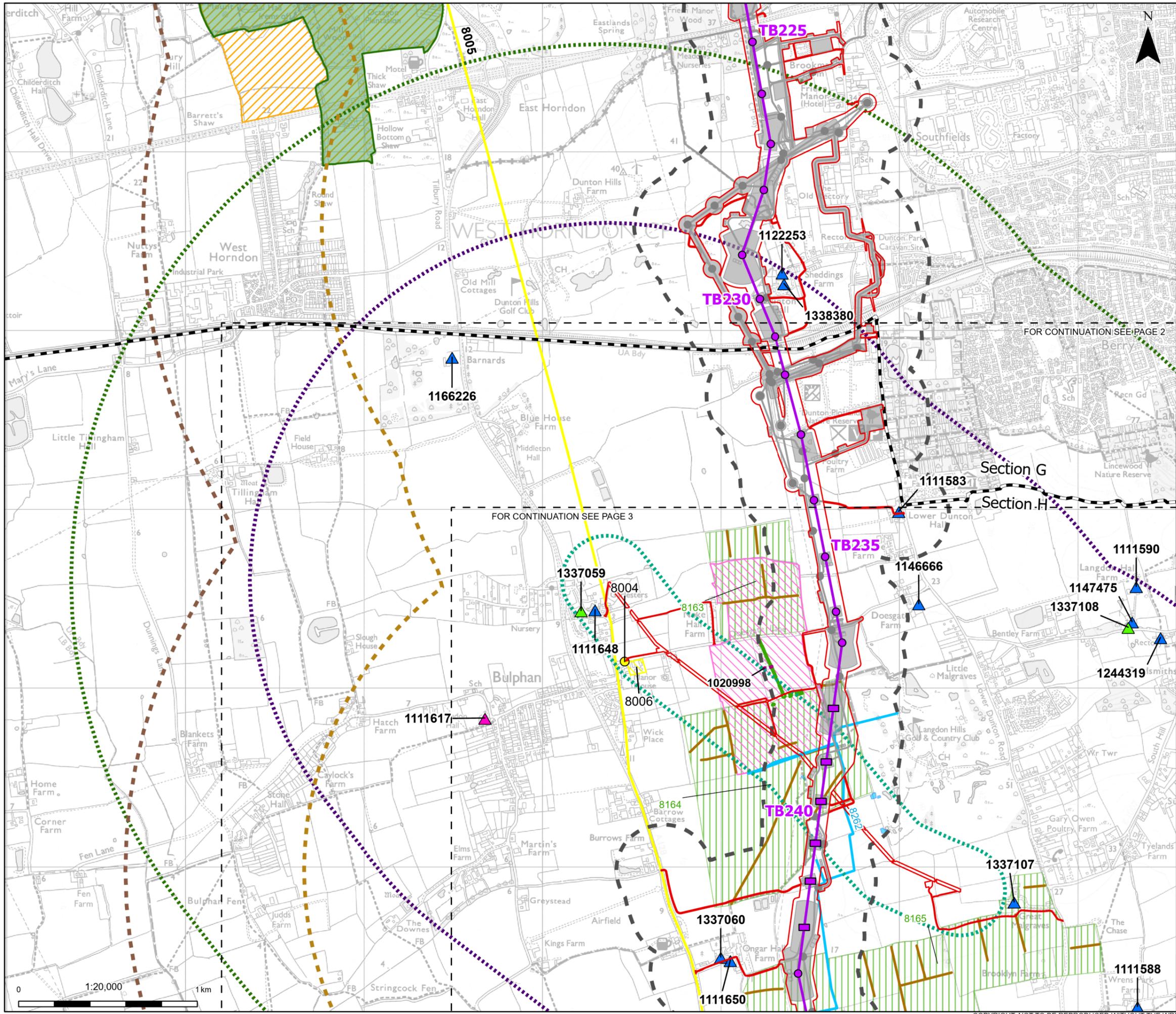
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Drawn	K. Fischer	Date	March 26
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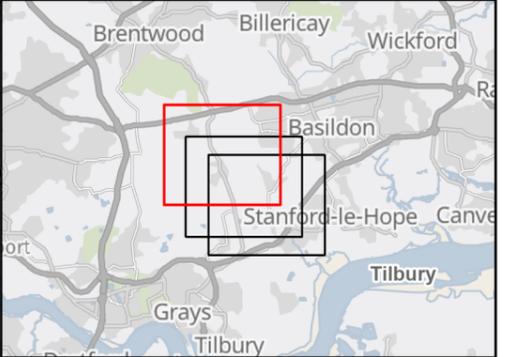
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- Order limits
- Sheet index outline
- Project section line
- Proposed low height pylon location
- Proposed standard lattice pylon location
- Proposed overhead line alignment
- Environmental mitigation and permanent construction and operational works
- 250 m Study Area
- 2 km Study Area
- 3 km Study Area
- Study area from Bulphan centre line
- 250 m Study Area
- 2 km Study Area
- 3 km Study Area
- Designated assets
- Listed buildings
- ▲ Grade II*
- ▲ Grade II
- Conservation area
- Registered parks and gardens grade II*
- Scheduled monuments
- Non-designated assets
- Additional Change Request 1 HER Monument Point
- Additional Change Request 1 HER Monument Line
- Additional Change Request 1 HER Monument Polygon
- HER Monument Polygon
- HER Cropmark Line
- Project Mapped Cropmark Line
- Project Mapped Cropmark Polygon
- Historic Mapping Line
- Historic Mapping Polygon
- 250m - Non-designated assets, 2km - scheduled monuments, grade I, II* and II
- designated assets, conservation areas, 3km - scheduled monuments, grade I and II* designated assets.

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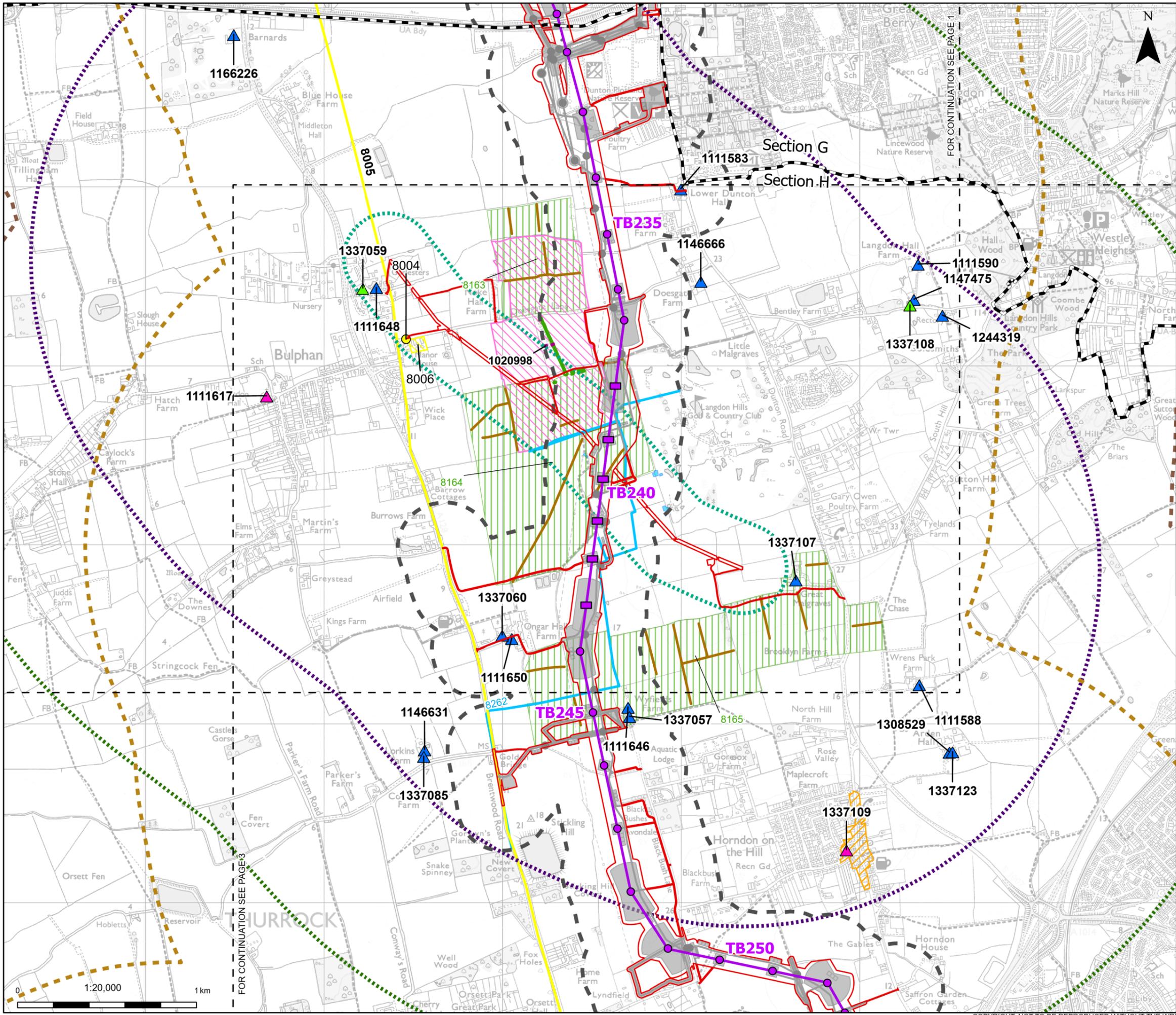
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 Page 1 of 3

Designed	F. Audinot	Date	March 26
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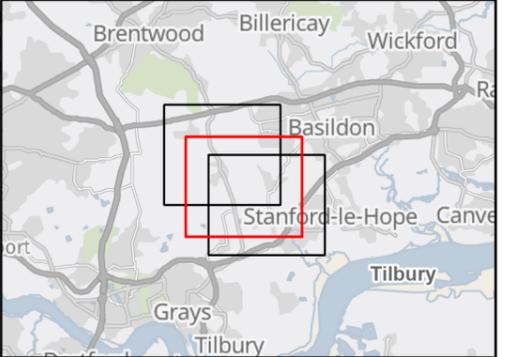
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Revision:
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- Order limits
- Sheet index outline
- Project section line
- Proposed low height pylon location
- Proposed standard lattice pylon location
- Proposed overhead line alignment
- Environmental mitigation
- Other temporary and permanent construction and operational works
- 250 m Study Area
- 2 km Study Area
- 3 km Study Area
- Study area from Bulphan centre line
- 250 m Study Area
- 2 km Study Area
- 3 km Study Area
- Historic Mapping Line
- Historic Mapping Polygon
- 250m - Non-designated assets, 2km - scheduled monuments, grade I, II* and II designated assets, conservation areas, 3km - scheduled monuments, grade and II* designated assets.
- Listed buildings
- ▲ Grade I
- ▲ Grade II*
- ▲ Grade II
- Conservation area
- Scheduled monuments
- Additional Change Request 1 HER Monument Point
- Additional Change Request 1 HER Monument Line
- Additional Change Request 1 HER Monument Polygon
- HER Monument Polygon
- HER Cropmark Line
- Project Mapped Cropmark Line
- Project Mapped Cropmark Polygon

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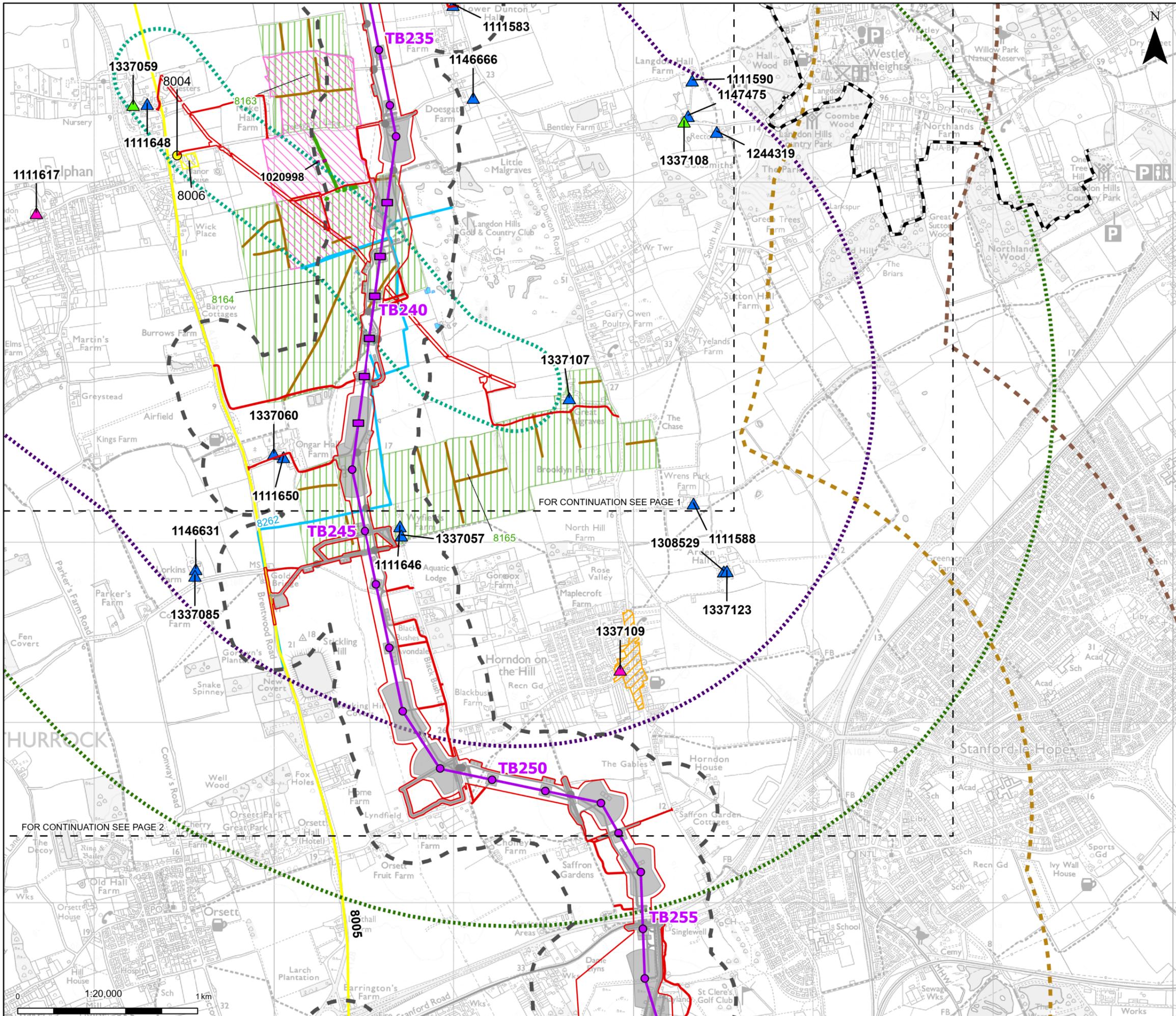
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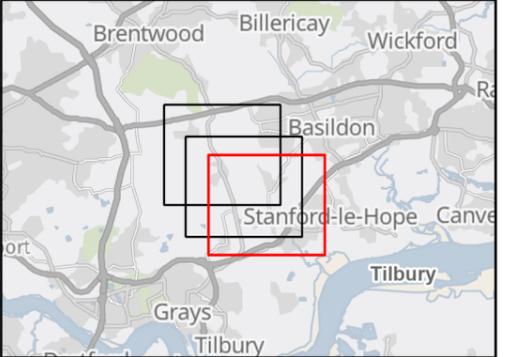
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Revision:
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- Order limits
- Sheet index outline
- Project section line
- Proposed low height pylon location
- Proposed standard lattice pylon location
- Proposed overhead line alignment
- Other temporary and permanent construction and operational works
- 250 m Study Area
- 2 km Study Area
- 3 km Study Area
- Study area from Bulphan centre line
- 250 m Study Area
- 2 km Study Area
- 3 km Study Area
- Designated assets
- Listed buildings
- ▲ Grade I
- ▲ Grade II*
- ▲ Grade II
- Conservation area
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- Additional Change Request 1 HER Monument Point
- Additional Change Request 1 HER Monument Line
- Additional Change Request 1 HER Monument Polygon
- HER Monument Polygon
- HER Cropmark Line
- Project Mapped Cropmark Line
- Project Mapped Cropmark Polygon
- Historic Mapping Line
- Historic Mapping Polygon
- 250m - Non-designated assets, 2km - scheduled monuments, grade I, II* and II designated assets, conservation areas, 3km - scheduled monuments, grade and II* designated assets.

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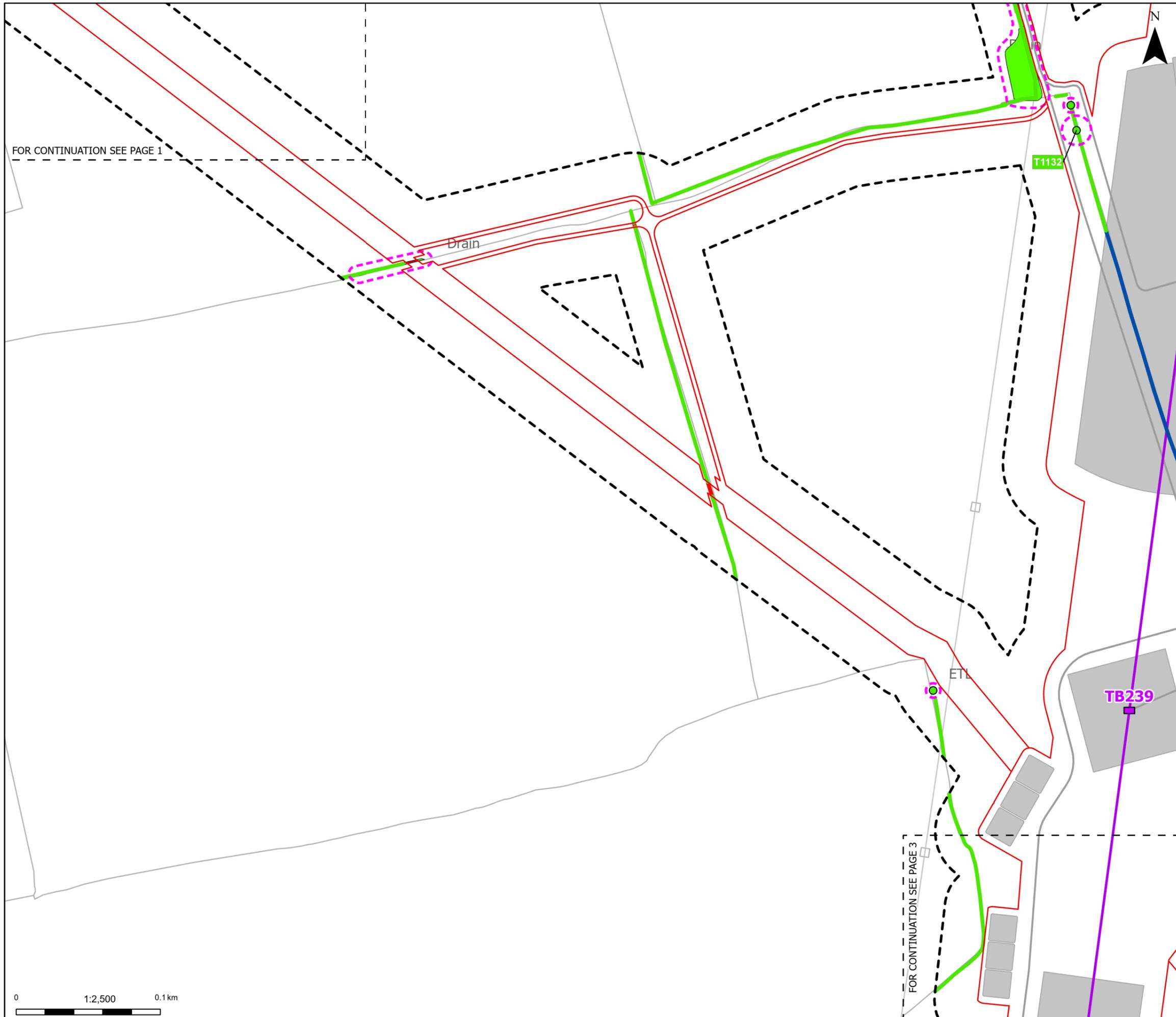
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 Page 3 of 3

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Drawn	K. Fischer	Date	March 26
Checked	A. Fell	Date	March 26
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Revision:
 A



Order limits
 Sheet index cutline

Proposed project design details
 Proposed low height pylon location
 Proposed overhead line alignment
 Other temporary and permanent construction and operational works

Discipline specific constraints
 Arboriculture Study Area
 Root protection area

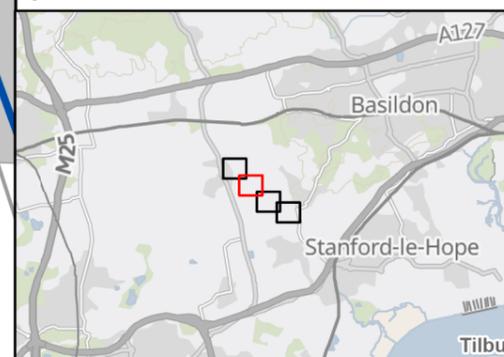
Hedgerow - Impact
 Removed
 Affected Managed
 Unaffected

Groups of trees - Impact
 Removed
 Unaffected

Trees - Impact
 Unaffected

Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the alignment. For further details regarding the design, please refer to Figures 4.1 (document reference 6.4.F.1) and 4.2 (document reference 6.4.F.2).

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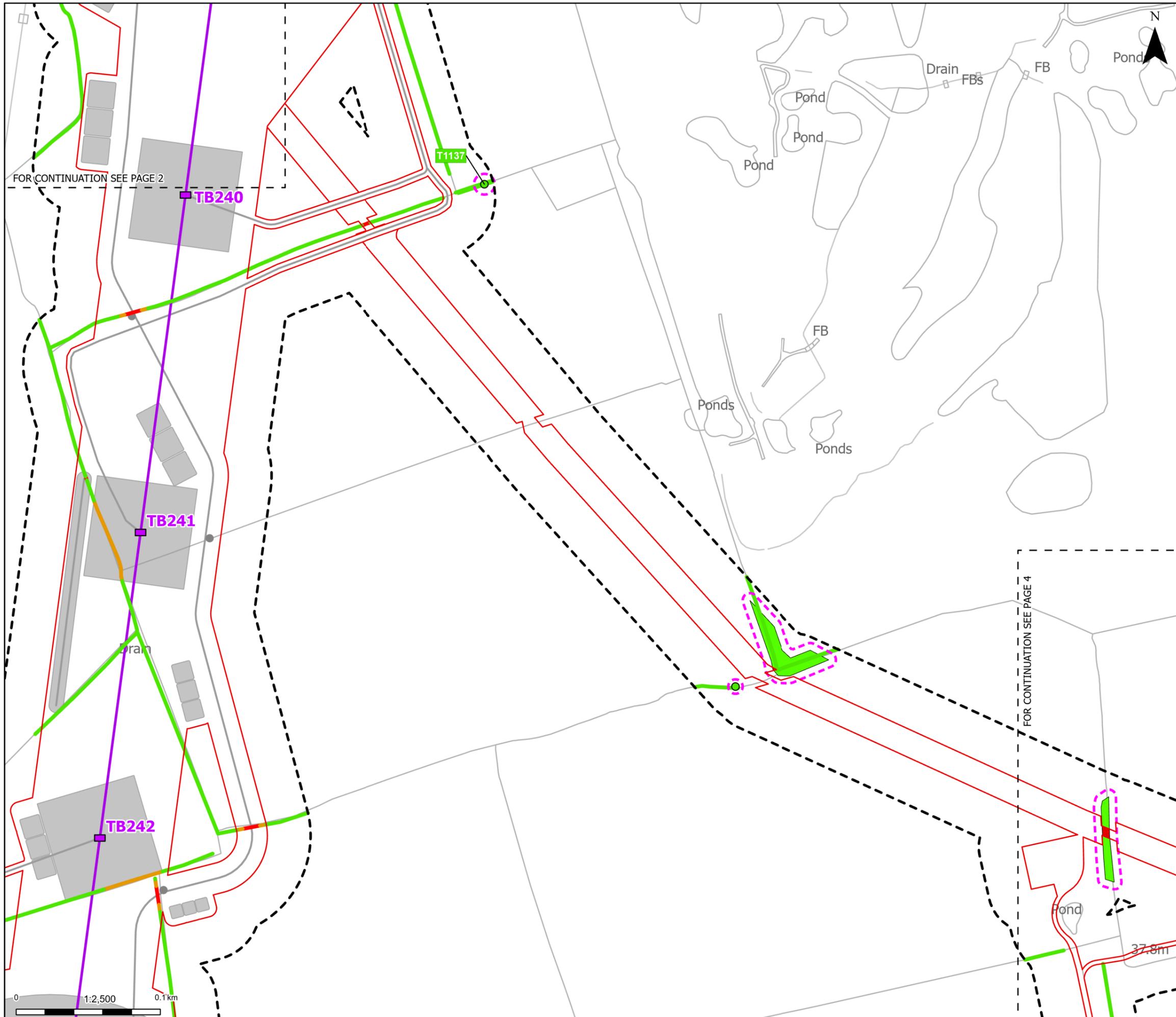
PROJECT:
nationalgrid Norwich to Tilbury

Title:
 Figure CR1.7- Arboriculture Impacts Plan Change Request 1
 Page 2 of 4

Designed	M. Watson	Date	March 26
Drawn	J. Acero Leon	Date	March 26
Checked	A. Fell	Date	March 26
Approved	K. Burrows	Date	March 26
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Original Size:	A3	Grid:	OS
Suitability Code:	A2	Project Number:	10059280

Suitability Description:
 Accepted as Concept Stage

Drawing Number: 10059280-ARC-EBD-ZZ-DR-ZZ-00892	Revision: A
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Order limits
 Sheet index outline

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 Proposed overhead line alignment
 Other temporary and permanent construction and operational works

Discipline specific constraints
 Arboriculture Study Area
 Root protection area

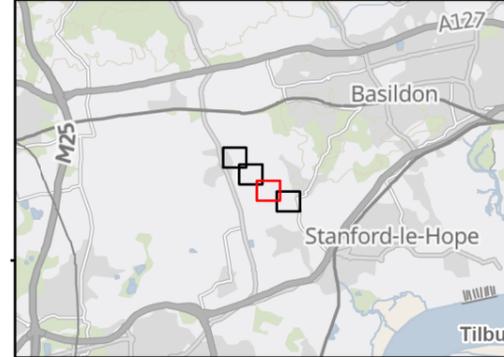
Trees - Impact
 Unaffected

Hedgerow - Impact
 Removed
 Potentially Affected
 Unaffected

Groups of trees - Impact
 Removed
 Unaffected

Note: The proposed overhead line alignment and proposed underground cable alignment together comprise the alignment. For further details regarding the design, please refer to Figures 4.1 (document reference 6.4.F.1) and 4.2 (document reference 6.4.F.2).

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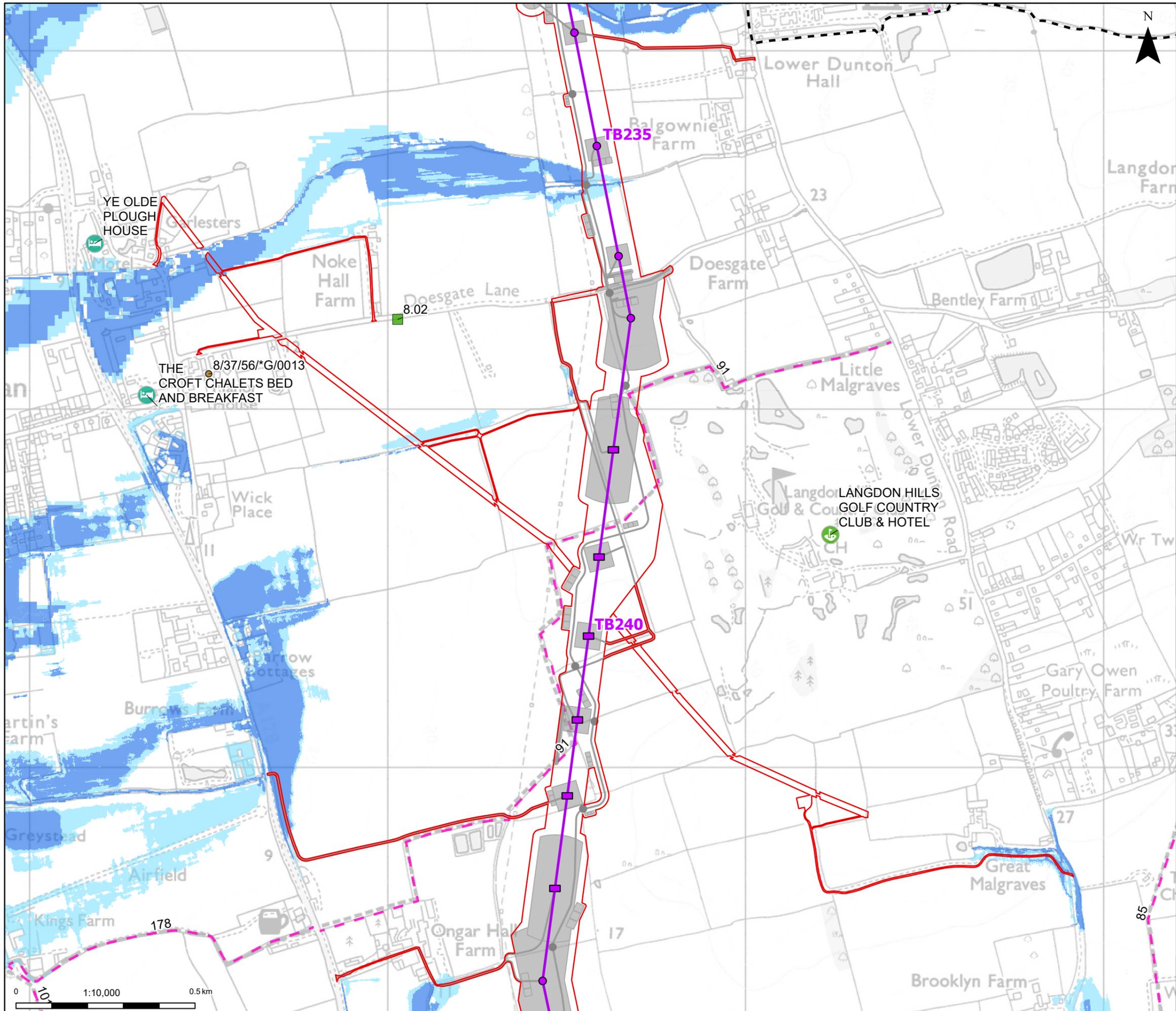
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 Change Request 1
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Designed	M. Watson	Date	March 26
Drawn	J. Acero Leon	Date	March 26
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Approved	K. Burrows	Date	March 26
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Original Size:	A3	Grid:	OS
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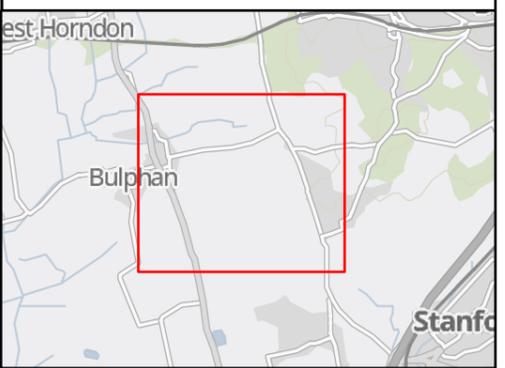
Suitability Description:
 Accepted as Concept Stage

Drawing Number:
 10059280-ARC-EBD-ZZ-DR-ZZ-00892

Revision:
 A



- Order limits
- Project section line
- Proposed project design details**
- Proposed low height pylon location
- Proposed standard lattice pylon location
- Proposed overhead line alignment
- Other temporary and permanent construction and operational works
- Discipline specific constraints**
- 🏠 Campsite, B&B, Holiday Home and Hotel
- 🏊 Sports Club
- ES Landscape and Visual Viewpoint (Photomontage)
- Deregulated Groundwater Abstractions
- Public Rights of Way
- Flood Zone 2
- Flood Zone 3



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Title:
Figure CR1.8 - Other Environmental Constraints (Change Request 1)

Designed	C. Banks	Date	March 26
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Checked	A. Fell	Date	March 26
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