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Norwich to Tilbury

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**Document: 8.5.9 Applicant's Response to Compulsory Acquisition
Hearing 2 Action Points**

Final Issue A

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nationalgrid

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1. About this Document

1.1 Introduction

- 1.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) response to action points addressed to the Applicant arising at Compulsory Acquisition Hearing 2 (CAH 2) held on 29 April and 30 April 2026.
- 1.1.2 The Examining Authority (ExA) issued a list of action points during the hearings and subsequently published the actions from CAH 2 in written form on 5 May 2026 [EV10-013].
- 1.1.3 This document provides responses to those actions, due at Deadline 4, that were specifically addressed to the Applicant.

2. Applicant's Response to CAH 2

2.1 The Applicant's Response to Actions Table

Table 2.1 Response to CAH 2 Actions

Action No.	ExA Description	Applicant's Response
01	<p>Status/ role of UKPN</p> <p>Provide a note regarding the status of UKPN in negotiations. regarding current position on Heads of Terms (HoT) for voluntary agreements. Applicant to provide details in the Land Rights Tracker as to when UKPN will also be negotiating Heads of Terms as well as the Applicant, and how the two sets of HoT are working together.</p>	<p>In respect of UK Power Networks (UKPN), the Applicant has sought to ensure a coordinated and aligned approach. UKPN has confirmed that it intends to align its HoTs with the Applicant's format, subject to any specific requirements of its own easement terms. UKPN has also indicated that it will adopt payment principles consistent with the Applicant's published strategy, such that negotiations with affected parties can proceed on a comparable basis. This alignment is intended to reduce duplication, simplify engagement for landowners and their agents, and minimise delay in progressing voluntary agreements. The Applicant and UKPN are actively coordinating their engagement activity. Approximately 30% of Affected Parties are subject to both Applicant and UKPN apparatus, and the parties have therefore established regular coordination meetings to review negotiation progress and address interface issues. Joint meetings with affected parties and their agents have been undertaken where matters are more complex, and the Applicant remains willing to facilitate further joint engagement where appropriate. Additional steps are being taken to strengthen coordination, including increased information sharing, encouraging UKPN participation in agent group discussions, and ensuring clear communication to affected parties regarding the alignment of HoTs and the respective roles of each statutory undertaker.</p> <p>Overall, these measures are intended to provide a clear, coordinated and consistent approach to voluntary land rights acquisition across both organisations, reducing complexity for affected parties while maintaining appropriate separation between the respective statutory undertakers' legal rights and obligations.</p>

Action ExA Description No.	Applicant's Response
	<p>At this stage, UKPN's programme for issuing and negotiating HoTs is being developed alongside its ongoing engagement and is not yet fixed in terms of timing or sequencing relative to the Applicant's programme. The Applicant is currently working with UKPN to develop their ongoing engagement strategy and will provide a further update on this at Deadline 5. 4.4 Land Rights Tracker [Revision D] has been updated for Deadline 4 to show where UKPN will also be seeking HoTs from APs. This will be further updated for Deadline 5 to show UKPN engagement and negotiations.</p>
<p>03 Response to Mr Langton Provide response regarding Mr Langton's comments about private water supplies and access road.</p>	<p>Potential impacts on private water supplies have been assessed in 6.9.A3 Environmental Statement Appendix 9.3 - Groundwater Baseline and Qualitative Groundwater Risk Assessment [APP-184]. This includes abstraction 8/36/19/*G/0071 which is understood to be the one referred to by Mr Langton. The assessment concludes that on the basis that the abstraction is outside of the Order Limits, and the proposed Project activities closest to the abstraction are not likely to have an impact on groundwater (quality, levels or flow), impacts on this abstraction are not considered likely.</p> <p>Commitment W04 in 7.2 Outline Code of Construction Practice [Revision D] secures the recourse for landowners or tenants who report that the works have affected their private water supply. This includes details of the initial response time, and the mitigation options if the works are shown to be the cause of the issue.</p> <p>The permanent access road to the Cable Sealing End (CSE) compound connects to a new permanent bellmouth on Bottle Bridge Road. The bellmouth has been sited away from the existing airfield access in order to achieve the visibility splays required to ensure its safe operation. The permanent access road is required to connect the CSE compound to the local road network, providing access for operation (and maintenance) activities, which would be up to 5 m wide (increasing locally for passing places and for tracking of larger vehicles on bends). The permanent access road follows the existing airfield access and field boundaries to reach the CSE compound.</p> <p>The permanent access routes for the overhead line have been proposed to follow the field boundary, with access only required for ad hoc surveys, route inspection and maintenance. This route would only be used by foot patrols to inspect the assets potentially once a year or every few years depending on the condition and age of the assets. It would also include light goods vehicles (for example a 4x4 potentially with a trailer) if there was a need for any</p>

Action ExA Description No.	Applicant's Response
	<p>maintenance activities such as replacements of fittings. Repairs are typically undertaken by climbing the pylons, which is a benefit of using lattice pylons that can be climbed without the need for a crane. As this would be maintenance and repairs, it would be irregular and infrequent. It could be one or two times a year or may not be needed for 20 years, and as such will be reviewed and agreed with the Affected Party nearer the time.</p>
<p>04 Proposals for biodiversity net gain Respond to Mr Fisher's comments about biodiversity net gain (BNG), including the potential for landowners to provide BNG themselves.</p>	<p>Environmental Areas are proposed around the Fairstead CSE compounds (Tilbury Side and EACN Side) to provide landscape and visual mitigation while also offering ecological value. They are therefore multi-functional areas where landscape and visual mitigation and biodiversity gains could be achieved together and not provided solely for biodiversity gains. As is explained in Section 3 of 4.1 Statement of Reasons [REP3-010], the Applicant is seeking powers to compulsorily acquire land and/or rights to enable the delivery of environmental mitigation measures. Where possible, such mitigation will be taken into account for the purposes of the Applicant's Biodiversity Net Gain (BNG) calculations for the Project.</p> <p>The approach the Project is taking to BNG is outlined within 7.1 Biodiversity Net Gain Report [APP-299]. Whilst some BNG will be delivered through replacement planting within the Order Limits and through landscape proposals within the proposed Environmental Areas, it is intended that offsite BNG will provide strategic and consolidated legacy sites within Norfolk, Suffolk and Essex to maximise benefits for nature. Given the scale of the Project, and because most of the land within the Order Limits will be returned to its original use, predominantly agriculture, the majority of the Project's BNG is not deliverable onsite (within the Order Limits). Therefore, offsite BNG will be sought through registered habitat banks delivered by a registered body which will ensure that the overall BNG commitment with wider environmental and societal benefits can be achieved</p> <p>Mr Fisher's comments regarding the desire to create biodiversity units to sell is noted. For the Project to be able to consider specific offsite BNG sites they would need to be a registered habitat bank or soon to be registered. National Grid is developing a procurement exercise that will include identifying suppliers of offsite biodiversity gains to support the portfolio of projects, including major infrastructure projects. This will be procured through a Qualifying Utilities Dynamic Market (QUDM), under the Procurement Act 2023. The QUDM is a pre-vetted pool of capable suppliers and works as a dynamic</p>

Action ExA Description No.	Applicant's Response
	<p>framework where a utility company publishes a notice, suppliers register and qualify (proving their technical capability). National Grid will then be able to invite the qualified members to bid for opportunities, through either spot tenders for individual projects, spot tenders for combined project requirements, or through an overarching framework. Applications to enter the QUDM are anticipated to open in May 2026 and will be advertised on the Government Find a Tender Service.</p> <p>Offsite BNG sites will be selected based on the Applicant's BNG site selection criteria which will consider a range of factors including proximity to the Project, geographical location, local nature recovery strategies, habitat type, habitat condition, cost and timings amongst others.</p>
<p>05 Map clarification Provide clarification on the map shading in the area of Mr and Mrs, and Mr Lanham's landholdings.</p>	<p>The Applicant issued two sets of HoT packs to the Affected Persons on 9 April 2026 to cover the separate titles (EX543413 and EX245107). The extent of shading in the plans attached to the Heads of Terms documents is under ongoing negotiation with the landowners' agent specifically in regard to the extent of Grantors land and the extent of the access routes shown and the requirements for use. This remains an ongoing discussion point as part of the voluntary negotiations, and the latest meeting to discuss this matter was held on 11 May 2026 between Fisher German and the agent acting on behalf of the Lanham families.</p>
<p>06 Status of Innova Renewables as a statutory undertaker Provide written response to Innova's comments that it is a Statutory Undertaker and how this will be taken forward in handling their objections and the Statutory Undertakers Tracker.</p>	<p>It is acknowledged that Hall Farm Solar BESS Limited (an entity controlled by Innova Renewables) was granted an electricity generation licence by Ofgem on 2 April 2026. Accordingly, the Applicant is content to treat Hall Farm Solar BESS Limited as a statutory undertaker for the purposes of the remainder of the Examination. 8.7 Statutory Undertaker Tracker [Revision C] has been updated on this basis.</p>
<p>07 Little Waltham Pumping Station Confirm which land plots at Little Waltham pumping station are to be put into 'class 8' in terms of identifying land that will not be subject to Compulsory</p>	<p>The Applicant confirms that land at Little Waltham Pumping Station within plot F-3/96 will not be subject to Temporary Possession powers. However, adjoining plots F-3/72, F-3/91 and F-3/93 are required to remain subject to Temporary Possession powers for the purposes of the provision of utilities supplies (including electricity supply) to a temporary construction compound, although the Applicant can maintain access for the benefit of</p>

Action ExA Description No.	Applicant's Response
Acquisition or Temporary Possession powers.	Northumbrian Water Limited to Little Waltham Pumping Station throughout the construction of the authorised development. An agreement including these protections has already been sent to Northumbrian Water Limited.
<p>08 National Highways</p> <p>Update Book of Reference (BoR) for de-trunked roads. Provide confirmation of when the BoR may be updated if not to be provided at Deadline 4, and if not provided at Deadline 4 provide a separate list of those plots that are to be updated in relation to de-trunked roads at Deadline 4 in advance of the full update to the BoR.</p>	<p>The Applicant is in receipt of comments from National Highways regarding the land interests ascribed to National Highways in the Book of Reference. The Applicant is scheduled to respond to National Highways imminently with proposed 'next step' actions, in respect of all land parcels where National Highways have an interest.</p> <p>In relation to the de-trunked roads specifically, the Applicant feels it is prudent to first get confirmation from National Highways regarding the proposed amendments, before any wholesale changes to the Book of Reference are made.</p> <p>The Applicant anticipates sending proposed changes to the Book of Reference to National Highways for their approval in May 2026, prior to Deadline 5. In the event National Highways agree to the proposed amendments to the Book of Reference, the Applicant will endeavour to update the Book of Reference in respect of de-trunked roads (and consequential amendments including the Statement of Reasons Appendices, and the Land Rights Tracker for Deadline 5.</p> <p>The land parcels identified by National Highways as de-trunked roads can be found in Appendix A.</p>

Appendix A. Land Parcels Identified by National Highways as De-trunked Roads

Appendix A

Land Parcels Identified by National Highways as De-trunked Roads

Table A.1 Land Parcels Identified by National Highways as De-trunked Roads

Title Number	National Highways Description of Land if Different	Tenure of Title	Plot Ref Number	Drawing Number
SK311376	land at Stowmarket Road, Badley, Ipswich	Possessory title	B13/12	B13
SK309382	Land at Stowmarket Road, Badley, Ipswich	Freehold title	B13/15	B13
EX823871	Land at A127, Dunton, Brentwood	Freehold title	G6/37	G6
Unregistered	N/A	Unregistered title	G6/38	G6
EX823692	Land at A127, Dunton, Brentwood	Freehold title	G6/40	G6
Unregistered	N/A	Unregistered title	G6/45	G6
EX814667	Land at A127, Dunton, Brentwood	Freehold title	G6/46	G6
SK309382	Land at Stowmarket Road, Badley, Ipswich	Freehold title	B12/108	B12
SK400924	Land lying to the west of Doveshill Farm, Badley, Ipswich	Freehold title	B12/109	B12
EX823871	Land at A127, Dunton, Brentwood	Freehold title	G6/36	G6
EX814941	Land at A127, Dunton	Freehold title	G6/60	G6
Unregistered	N/A	Unregistered title	B12/94	B12
SK309382	Land at Stowmarket Road, Badley, Ipswich	Freehold title	B12/95	B12
Unregistered	N/A	Unregistered title	B12/96	B12
SK309383	Land at Stowmarket Road, Badley, Ipswich	Freehold title	B12/113	B12

Title Number	National Highways Description of Land if Different	Tenure of Title	Plot Ref Number	Drawing Number
Unregistered	N/A	Unregistered title	B12/112	B12
Unregistered	N/A	Unregistered title	B13/2	B13
SK311376	land at Stowmarket Road, Badley, Ipswich	Possessory title	B13/5	B13
SK309382	Land at Stowmarket Road, Badley, Ipswich	Freehold title	B13/7	B13
Unregistered	N/A	Unregistered title	C18/38	C18
EX811861	Land at Brentwood Road, Dunton, Brentwood	Freehold title	G6/19	G6
EX814941	Land at A127, Dunton	Freehold title	G6/56	G6
EX814941	Land at A127, Dunton	Freehold title	G6/58	G6
EX814941	Land at A127, Dunton	Freehold title	G6/62	G6
EX814941	Land at A127, Dunton	Freehold title	G6/63	G6
EX814941	Land at A127, Dunton	Freehold title	G6/64	G6
EX814941	Land at A127, Dunton	Freehold title	G6/68	G6

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