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# Norwich to Tilbury

## Volume 4: Compulsory acquisition information

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- Tracked Changes Version

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nationalgrid

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# 1. Introduction

## 1.1 Overview

1.1.1 This document provides an explanatory preface to the Detailed Land Rights Tracker (DLRT) submitted at Deadline ~~53~~ for the Norwich to Tilbury project. Its primary purpose is to assist the Examining Authority and other external stakeholders in understanding how the DLRT should be read, interpreted, and relied upon during Examination.

~~4.1.41.1.2~~ This document was originally submitted at Deadline 3. This update at Deadline 5 consequently includes references updates made to the structure of the DLRT, the engagement undertaken since Deadline 3, and the Applicant's plans for further engagement during the remainder of the Examination. The original drafting submitted at Deadline 3 has been retained, this pre-amble is therefore drafted with tracked changes inclusive for benefit of the end-reader.

~~4.1.21.1.3~~ The document explains the Applicant's land rights and engagement framework, including how interests in land are identified, categorised, and recorded through the land referencing process. In particular, it sets out the rationale for the three established categories of Persons with an Interest in Land (PILs) and explains how each category is treated within the DLRT, including differences in engagement approach, negotiation status, and the issue (or non-issue) of Heads of Terms.

~~4.1.31.1.4~~ A key focus of the document is to clarify why Heads of Terms are issued to some parties and not others, and to address common areas of misunderstanding around negotiation status, entitlement, and compensation. The document explains that Heads of Terms are used solely where the Applicant is seeking to acquire land or land rights by voluntary agreement, and that their absence does not imply a lack of consultation or engagement.

~~4.1.41.1.5~~ The document also explains the Applicant's incentive period, including how and when it is triggered, how it operates in practice, and how it supports the Applicant's strategy to secure voluntary agreements ahead of any reliance on compulsory acquisition powers. This is intended to provide transparency and consistency in how incentive arrangements are applied and communicated.

~~4.1.51.1.6~~ In addition, the document summarises engagement activity undertaken to date, outlines the next steps in the engagement and negotiation process, and explains how engagement activity is recorded and reflected within the DLRT. It links the DLRT to the wider consultation record and Examination submissions, demonstrating how land engagement is managed in a structured, proportionate, and auditable manner.

~~4.1.61.1.7~~ Overall, the document provides context, justification, and assurance that the DLRT is applied consistently, proportionately, and in accordance with established land referencing, engagement, and compulsory acquisition practices for nationally significant infrastructure projects.

## 2. Structure of the Detailed Land Rights Tracker

### 2.1 What's Changed

2.1.1 Since the last iteration of the Detailed Land Rights Tracker (DLRT) submitted at Deadline ~~4~~ 4.4 Land Rights Tracker (Final Issue B) [REP2-011], there have been several changes to the format:-

1) The Dashboard has been updated

1)2) Due to the extent of engagement conducted, there are numerous instances where the engagement records against a given affected party are now in excess of the visible field, this is a limitation of Microsoft Excel. The Applicant has therefore created an additional engagement column, separating pre-2026 engagement with 2026 engagement to preserve the integrity of the DLRT, whilst retaining all historic engagement and communications reported

2)3) The Applicant has also added a 'HoTs Not Required' status against certain HoTs, a supporting summary explaining why HoTs are not required is provided on an affected person basis, and can be found in Column I

i. The Applicant is exploring ways of enhancing this entry further, to clarify the exact land interests a given affected person holds vs the land rights sought by National Grid, and why on a case-by-case basis, HoTs are not required for a given affected person. The Applicant endeavours to implement this enhancement at Deadline 6.

3)4) An additional tab has been created citing affected persons UKPN are in communication with. The Applicant has endeavoured to align the information to the same pro-forma as the National Grid DLRT.

### 2.2 What the Dashboard tab tells you

#### Overall engagement and negotiation progress

2.2.1 The dashboard acts as a snapshot of land and rights acquisition activity progressed by National Grid. It summarises:

- The number of affected persons and interests.
- How many of those interests are Category 1 vs Category 2.
- The status of Heads of Terms across the scheme (issued, signed, or not yet issued).
- The stage of negotiations highlighting that many discussions are ongoing following issue of HoTs, with common issues including compensation, route alignment, practical matters, and timing.

## HoTs status at a glance

2.2.2 The dashboard clearly shows:

- The total number of interests receiving Heads of Terms versus those that have not.
- A status breakdown (e.g. signed, issued but not agreed, not issued).
- That the majority of Heads of Terms shown are in an “Amber” state, indicating they are issued but still under discussion rather than concluded.

2.2.3 This gives a quick sense of how far through negotiation the project is overall, without needing to review individual cases.

## Engagement activity (National Grid)

2.2.4 The tab includes high level engagement metrics reflective of engagement conducted by National Grid such as:

- Number of direct meetings with affected persons.
- Number of land agent meetings.
- How many affected persons have been represented or not yet met.

2.2.5 This helps demonstrate the level of active engagement being undertaken across the scheme by National Grid.

## Engagement activity (UKPN)

2.2.6 A new tab has been inserted in the DLRT at Deadline 5, providing high level engagement metrics reflective of engagement conducted by UKPN such as:

- Number of direct meetings with affected persons
- Number of land agent meetings.
- How many affected persons have been represented or not yet met.

2.2.7 This helps demonstrate the level of active engagement being undertaken across the scheme by UKPN.

2.2.8 The UKPN tab has included a few notable features to aid cross-reading between National Grid and UKPN engagement, namely:

- PIL Reference/Land Referencing Party ID
  - Column A cites the National Grid PIL Reference utilised across the various ‘Lands’ DCO deliverables e.g. Book of Reference, DLRT, Statement of Reasons Appendices etc.
  - Column B cites the UKPN equivalent
- PIL Name (Affected Person)
  - Column C cites the National Grid PIL Name (Affected Person)
  - Column D cites the UKPN equivalent

# 3. Category 1 Persons with an Interest in Land

3.1.1 Before addressing which Category 1 Persons with an Interest in Land (PILs) have been issued with particular documents, it is helpful to set out, in chronological order, the different stages of land engagement material used by the Applicant and their respective purposes. For the avoidance of doubt, the engagement process outlined below is reflective of National Grid activities, only.

3.1.43.1.2 -The process began with the issue of early Heads of Terms engagement letters, which were sent to all Category 1 PILs to notify them of the Project, explaining why their land interests had been identified, and inviting them to engage in voluntary discussions. This was followed by the circulation of template Heads of Terms being issued to all Category 1 PILs, which set out the Applicant's standard commercial and legal framework for voluntary land agreements in an unpopulated, illustrative form, to promote transparency and consistency.

3.1.23.1.3 Where subsequent land referencing, design development and engagement confirmed that a specific voluntary land transaction was required and appropriate, the Applicant then issued populated Heads of Terms, to all Category 1 Freehold PILs which are tailored to the individual plot and interest and form the basis for detailed voluntary negotiations. These populated Head of Terms have been issued in iterations, including Version 1 (V1) and, following feedback, extensive meetings with individual PILs and their agents and refinement, Version 2 (V2), which incorporates clarifications and updates but does not alter their non-binding status. Importantly, progression through these stages is deliberate and sequential: the issue of engagement letters or template Heads of Terms does not presuppose that populated Heads of Terms will be required or issued in every case. The staged approach reflects a proportionate engagement strategy, ensuring early transparency with all relevant interests while focusing detailed negotiations where they can realistically secure the land or rights required.

3.1.33.1.4 Building on the sequential approach outlined above, Heads of Terms are issued exclusively in circumstances where the Applicant seeks to acquire land or land rights by voluntary agreement. In practice, this means that if land referencing identifies a Category 1 Person with an Interest in Land (PIL), but subsequent project design no longer necessitates the acquisition of their land or rights or if potential impacts have been mitigated or avoided through design development there is no justification for issuing Heads of Terms, as no land transaction is required.

3.1.43.1.5 It is important to note that while Category 1 PILs generally possess a qualifying legal interest, there may be occasions where the recorded interest does not correspond to the rights the Applicant requires, such as cases involving split titles or superior interests. In these instances, negotiations are advanced only with the party who can actually grant the necessary rights, ensuring that Heads of Terms are issued to the appropriate interest holder and avoiding duplication or confusion.

- 3.1.53.1.6 The ExA has highlighted in ExAQ1 that there are 556 Category 1 Persons with an Interest in Land (PILs) who have not been issued with populated Heads of Terms (V1 or V2). This is not because the Applicant disregards their legal interests, but because, in certain circumstances, it is not necessary to issue Heads of Terms to every individual interest holder.
- 3.1.63.1.7 In many cases, the Applicant is seeking compulsory acquisition powers to impose a right and to take temporary possession in a plot or part of a plot, and engagement is therefore being progressed with the freeholder or superior interest holder, whose agreement would, if concluded, include provisions relating to the freeholder or superior interest holder obtaining relevant consents under the terms of their private contractual agreement with occupiers.
- 3.1.73.1.8 This approach of issuing early engagement material broadly, but progressing populated Heads of Terms only where a voluntary agreement would secure the required land rights from the freeholder or superior interest holder, is consistent with established practice in other nationally significant infrastructure projects and is intended to avoid duplication, confusion and unnecessary negotiations while still ensuring that all legal interests are properly recognised and protected.
- 3.1.83.1.9 This approach aligns with other consented nationally significant infrastructure projects which authorise the use of CA and/or TP powers, including Bramford to Twinstead Reinforcement, H2 Teesside and the Silvertown Tunnel.
- 3.1.93.1.10 -To the best of the Applicant's knowledge, every Category 1 PIL who, on the basis of the Applicant's own diligent enquiries, is a freehold landowner impacted by the Order Limits (and from whom the Applicant requires land or land rights) has been sent both the V1 Heads of Terms and the revised V2 set of Heads of Terms prior to Deadline 3.

## 4. Category 2 Persons with an Interest in Land

- 4.1.1 For the purposes of the Book of Reference, Category 1 Persons with an Interest in Land (PILs) include owners, lessees, tenants and occupiers. Category 2 PILs comprise persons who have an interest in land or a power to sell, convey or release land, but whose interest would not ordinarily necessitate the negotiation of a separate voluntary land agreement. For the avoidance of doubt, the engagement process outlined below is reflective of National Grid activities, only.
- 4.1.2 While Category 2 PILs are identified and consulted in accordance with the statutory requirements, they do not typically receive populated Heads of Terms. This is because the land rights required for the Project are secured through engagement with the relevant Category 1 interest holder.
- 4.1.3 This approach reflects the Planning Act 2008 guidance related to procedures for the compulsory acquisition of land and does not change the consultation requirements and contact made with Category 2 PILs.
- 4.1.4 Although Heads of Terms are not issued, Category 2 PILs are formally consulted under sections 42 and 44 of the Planning Act 2008 and are offered engagement to understand and manage construction effects on their legal interest in land. Where applicable, compensation is available under the statutory compensation code for loss or disturbance arising from the exercise of DCO powers, rather than through negotiated contractual agreements.
- 4.1.5 The Heads of Terms, and subsequent land agreements, require the freeholder or superior interest holder to take steps necessary to manage and secure third-party consents including from tenants and occupiers or lenders, similar to the position in any standard conveyancing transaction. This approach is established practice and reflects the complex and varied nature of what are essentially private contractual arrangements on the land.
- 4.1.6 The Applicant's direct engagement and negotiation is focused on the interest holder capable of granting the rights required for the Project. This approach ensures that consents are sought by the party best placed to do so and avoids unnecessary duplication of engagement.

# 5. Category 3 Persons with an Interest in Land

## 5.1 Definition of Category 3 PILs

- 5.1.1 A person is identified within Category 3 where the Applicant, having made diligent inquiry, considers that the person would or might be entitled to make a relevant claim as a consequence of the implementation of the Order, the Order having been implemented, or the use of the land once the Order has been implemented.
- 5.1.2 A “relevant claim” is defined in section 57(6) of the Planning Act 2008 and comprises:
- (a) a claim under section 10 of the Compulsory Purchase Act 1965, being compensation where satisfaction is not made for the taking of, or injurious affection to, land subject to compulsory acquisition;
  - (b) a claim under Part 1 of the Land Compensation Act 1973, being compensation for depreciation in the value of land caused by physical factors resulting from the use of public works; or
  - (c) a claim under section 152(3) of the Planning Act 2008 where land is injuriously affected by the carrying out of the authorised works.
- 5.1.3 Where a Category 3 person has an interest within the Order land (and therefore within a defined plot), that person is included again in Category 1 or Category 2 in the Book of Reference with the relevant plot identified.
- 5.1.4 Where a person’s interest lies outside the Order land, but the Applicant considers that they should be included in Part 2 of the Book of Reference as potentially entitled to make a relevant claim, the entry “all plots in this section” is shown against that person. This reflects the fact that any such potential claim could arise from works associated with any of the land plots within the relevant section that are in proximity to that interest. There is no requirement on the Applicant to make any assumptions of where a potential claim may arise by reference to the plot numbers.

## 5.2 Engagement Approach

- 5.2.1 The NT project employs a proportionate, information led engagement approach for Category 3 PILs, rather than a negotiation-based strategy. This consists of:
- Notification and provision of information: Category 3 PILs are formally notified and provided with relevant project information.
  - Access to project information and contact points: PILs are given access to detailed project materials and clear channels for communication.
  - No routine meetings: Engagement does not involve scheduled meetings unless circumstances change, such as the emergence of new information indicating that land rights may be required, or if a PIL raises a specific concern warranting further discussion.

## **5.3 Heads of Terms and Negotiations**

- 5.3.1 Heads of Terms are not issued to Category 3 PILs, as the project is not seeking to acquire land or land rights from these parties. Where no land transaction is required, there is no legal or commercial basis for issuing Heads of Terms or entering into compensation negotiations.

## **5.4 Ongoing Review of Category 3 Status**

- 5.4.1 Category 3 PILs are kept under regular review throughout the development of the Project. Should changes occur in design, construction methodology, or access requirements, additional Category 3 PILS may be added (or removed) or an existing Category 3 PIL recategorised. Where recategorisation is necessary, the engagement approach is escalated appropriately (for example, to Category 2 or 1), which may then include the issue of Heads of Terms.

## 6. Additional schedules

6.1.1 The DLRT remains the Applicant's primary, comprehensive record of land interests, engagement activity and negotiation status across the Project. However, the Examining Authority has requested several additional, issue-specific schedules to extract and present particular matters of interest in a clearer and more accessible format for reporting and decision making purposes.

6.1.2 The following schedules have been updated for Deadline 5, where applicable.

6.1.26.1.3 These schedules do not replace the DLRT, but should be read alongside it, as they draw directly from the same underlying data and provide focused views on specific statutory considerations.

### 6.2 4.7 Crown Land Schedule Tracker

6.2.1 In response to CA 1.4 of the Examining Authority's Written Questions 1 (ExQ1) [PD-014], a Crown Land Schedule Tracker has been prepared to isolate land plots where a Crown interest may exist, reflecting the distinct statutory and procedural requirements that apply to Crown land. This enables the Examining Authority to clearly track engagement, consent status and progress with relevant Crown bodies separately from the wider population of affected persons, while remaining consistent with the land interests recorded in the DLRT.

### 6.3 8.14 Schedule of affected persons objecting to CA or TP

6.3.1 In response to CA 1.3 of the Examining Authority's Written Questions 1 (ExQ1) [PD-014], a schedule of affected persons objecting to CA or TP of their land or rights has been created at the request of the Examining Authority to extract those affected persons who have lodged objections to compulsory acquisition or temporary possession.

6.3.2 This provides a concise tracker of objections, reasons given, the Applicant's responses and progress toward resolution, supporting the ExA's reporting to the Secretary of State, while the DLRT continues to provide the full engagement and negotiation history for each interest. The Applicant's response to CA 1.3 (as set out in **Document 8.9.1 Applicant's Responses to First Written Questions**) explains the methodology and assumptions underpinning the schedule.

6.3.3 The Applicant notes the Examining Authority's Rule 17 Letter dated 1<sup>st</sup> June 2026, requesting further information from 'affected persons' (persons within category 1 and 2 of section 57 of the Planning Act 2008) on any outstanding objections to the proposed interference of their land rights.

6.3.2 Upon receipt of feedback from the Examining Authority in response to the aforementioned Rule 17 Letter, the Applicant's intention is to cross-reference the information provided against the 8.14 Schedule, and provide responses at an appropriate deadline, unless otherwise prescribed by the Examining Authority.

~~6.3.36.3.4~~ 8.12 Special Category Land Schedule.

~~6.3.46.3.5~~ In response to CA 1.6 of the Examining Authority's Written Questions 1 (ExQ1) **[PD-014]**, a Special Category Land Schedule has been prepared to identify and track land falling within statutory special categories (such as open space or common land) and to demonstrate compliance with the specific tests and exemptions under the Planning Act 2008. This schedule provides a focused assessment of special category land interests and objections, complementing the DLRT and drawing on the detailed analysis set out in Appendix C of the Statement of Reasons.

# 7. Engagement

## 7.1 Engagement to date

7.1.1 As previously confirmed by the Applicant there has been significant engagement with affected persons to date, and this has been outlined in the following documents submitted ~~at Deadlines 1 and 2~~ at the following Deadlines -

- 4.6 Land Rights Tracker Update (Final Issue A) [REP1-006] – Deadline 1
- 4.4 Land Rights Tracker (Final Issue B) [REP2-011] – Deadline 2
- 4.4 Land Rights Tracker (Final Issue C) – Deadline 3
- 4.4 Land Rights Tracker (Final Issue D) – Deadline 4
- 4.4 Land Rights Tracker (Final Issue E) – Deadline 5

## 7.2 What's happening next – process for further engagement on Heads of Terms

- Version 2 populated Heads of Terms were issued to all PILS on a phased basis as follows:
  - Sections C & D on 26th March 2026;
  - Sections E & F on 2nd April 2026;
  - Sections A, B, G & H on 9th April 2026
- Since 31st March 2026, the Applicant's appointed land agents, Fisher German, have been making ~~telephone~~ contact with all Category 1 freehold PILs who have been sent populated version 2 HOTS offering a meeting to discuss the terms in more detail and to discuss practical matters relating to the rights being sought over their land. Where PILs have an agent appointed this will be arranged through them, but where PILs do not have an agent appointed we will contact them directly as a priority. The DLRT (and wider schedules, where applicable) have been updated reflecting continued engagement leading up to Deadline 5.
- On a section-by-section basis, meetings with leading land agents who represent the largest numbers of PILS have taken place in person or on MS Teams and further such meetings have been offered. The Applicant will continue to proactively engage with PILs and to seek to reach agreement on Heads of Terms. Furthermore, the Applicant is arranging land agent working groups on a county-by-county basis, inviting land agents with affected party clients in the jurisdiction an opportunity to discuss HoTs (and associated topics) with National Grid and wider land agencies. The Suffolk land agent working group was held on the 4<sup>th</sup> June 2026.

- A clarification letter outlining the Applicant's position on matters that will not be dealt with under the Heads of Terms negotiations ~~will be were was~~ issued to all Category 1 freeholders during the week of 13th April 2026. The purpose of this letter ~~will be to is was to~~ provide further clarification and reassurance, ~~it will and to~~ help ensure affected persons clearly understand the status, scope and limitations of the Heads of Terms they have received.
- **Agricultural Land Drainage and Soil Management Engagement** – The Applicant is seeking information and engagement in meetings with Category 1 parties on matters pertaining to agricultural land drainage and soil management and has specialist advisers who will support the delivery of the Project.
- **Accommodation Works** - ~~will be dealt with via the project Commitments Register process and decisions from this have started to will be communicated in writing to the affected landowners. The Applicant's latest position is that the appropriate mechanism for securing commitments will depend on the nature of the item in question, but the same approach has been adapted as taken on other NGET projects. In practice:~~
  - ~~Certain matters may be secured through the contractual arrangements between the Applicant and its contractors~~
  - ~~Others may be reflected within the relevant management plans secured through the Development Consent Order (such as the **7.2 Outline Code of Construction Practice [Revision E]** and its subsequent detailed plans)~~
  - ~~Site-specific arrangements may be documented through Heads of Terms and any associated agreements.~~
- ~~The Applicant confirms that it will continue to engage with appointed agents to clarify how commitments will be secured and delivered, with the objective of ensuring that landowners have appropriate confidence that agreed accommodation works and provisions will be implemented.~~
- **Incentive Periods** - The Applicant will use additional incentive periods and opportunities to encourage parties to enter into Heads of Terms and voluntary agreements on a continuous but discretionary basis, in line with other nationally significant infrastructure projects.
- **Compensation** – ~~The Applicant acknowledges affected persons queries regarding 'compensation'. The Applicant's 'Land Rights Strategy' developed in 2010 (updated in 2024), provides a consistent methodology for acquiring rights for Development Consent Order (DCO) projects, and includes a discretionary payment schedule for the land rights sought, where these rights are secured via voluntary agreement.~~
- ~~Furthermore, where affected persons have wider concerns about financial matters e.g. loss of earnings due to perceived disruption by the Project during construction and/or operation, the Applicant remains committed to reviewing any evidenced based and quantifiable submissions, with a view to attempt to mitigate those perceived losses in the first instance.~~
- ~~Furthermore, those directly affected by the Order (i.e. affected persons and those with interests in the land required for the Project) will, in principle, be entitled to statutory compensation in accordance with the Compensation Code for e.g. loss or damage caused by the exercise of powers by the Applicant.~~

- **Continuous engagement** – where the Applicant receives no or limited engagement from landowners the Applicant and its agents Fisher German will continue to undertake a range of activities to try and unlock this including telephone calls, emails, written correspondence and door knocking. All of these efforts are carefully recorded and logged.
- HoTs Refinements - The Applicant has continued to engage with affected persons (and/or their professional representatives). Engagement has included issuing template Heads of Terms (HoTs) and subsequent revised versions, holding meetings with agents and landowners to discuss terms and land-specific matters, inviting feedback and incorporating amendments where appropriate, and continuing dialogue through their land agent (Fisher German) to progress both generic and site-specific issues.
- It is the Applicant's view that through proactive engagement, substantial amendments have been made to the HoTs and that there are few substantive points that remain outstanding.
- The Applicant confirms that negotiations have intensified in recent months, reflecting the need to address outstanding issues and move towards agreed positions. This includes ongoing discussions with agents at both a generic and landholding-specific level, supported by internal review processes and logging commitments to capture and respond to individual requirements.
- The Applicant will continue to engage with agents and representative bodies to provide updates on the status of HoTs negotiations where possible, while feedback on outstanding generic provisions continues to be reviewed with legal and technical teams and site-specific matters are progressed in parallel through direct engagement with landowners and their agents.
- The Applicant considers that continuing to issue and refine HoTs, while engaging on both generic and site-specific matters in parallel, remains an appropriate and proportionate approach to progressing voluntary agreements across a project of this scale.

## 8. Conclusion

- 8.1.1 This document has been prepared to provide clarity and transparency on how the DLRT for the Norwich to Tilbury project should be read, interpreted, and relied upon during Examination. It explains the Applicant's land rights and engagement framework, including the identification and categorisation of Persons with an Interest in Land, the purpose and appropriate use of Heads of Terms, and the rationale for differing engagement and negotiation approaches across Categories 1, 2, and 3.
- 8.1.2 The document demonstrates that the DLRT is not a simple record of negotiations, but a structured and auditable tool that reflects land referencing outcomes, engagement activity, and the evolving status of land rights requirements as the project design has developed. In particular, it clarifies that the absence of Heads of Terms does not indicate a lack of engagement or entitlement but rather reflects whether a land transaction is required and whether a party holds a qualifying legal interest capable of being acquired by agreement.
- 8.1.3 The Applicant has set out how engagement has been undertaken to date, how it is recorded within the DLRT, and how it will continue through the phased issue of populated Heads of Terms, ongoing negotiations, and meetings. This approach reflects established industry practice for nationally significant infrastructure projects and is consistent with the Applicant's Land Rights Strategy and previous DCOs.
- 8.1.4 Overall, the document provides assurance that land engagement and negotiation for the Norwich to Tilbury project is being managed in a proportionate, transparent, and consistent manner, and that the DLRT provides a reliable and accurate representation of land rights activity to support the Examining Authority's consideration of the Application.

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