



Planning Inspectorate

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Our Ref: EN020027
Date: 14 July 2026

The applicant
All local authorities
All relevant local highway authorities and
local flood risk authorities (including the
Water Management Alliance)
Historic England
Defence Infrastructure Organisation
Ministry of Defence Land Management
Services
Natural England
Norfolk Wildlife Trust
Suffolk Wildlife Trust
Essex Wildlife Trust
Raydon Wings Aerodrome
Affinity Water Limited (Ltd)
Anglian Water Services Ltd
Cadent Gas Ltd
Equinor New Energy Ltd
National Gas Transmission PLC,
National Highways and National
Highways (Lower Thames Crossing)
Network Rail Infrastructure Ltd
Northumbrian Water Ltd
Scottish Power Renewables UK Ltd
(including East Anglia 1 and East Anglia
3 Ltd) and
TC East Anglia 1 OFTO Ltd

Dear Sir/ Madam

The Infrastructure Planning (Examination Procedure) Rules 2010 – rule 17

Application by National Grid Electricity Transmission for an order granting development consent for the Norwich to Tilbury project

Request for further information relating to: the Development Consent Order; compulsory acquisition and temporary possession of land and rights; biodiversity, ecology and the natural environment; the historic environment; land use, soils and green infrastructure; landscape and visual effects; safety and security; socioeconomics, recreation and tourism; and the water environment

We are writing under rule 17 of the Infrastructure Planning (Examination Procedure) Rules 2010 in respect of a range of matters which are set out in Annex A of this letter.

The ExA asks for responses from the relevant parties that each question is addressed to by **deadline 7 (Tuesday 21 July 2026)**.

Yours faithfully

Susan Hunt

Lead member of the panel of Examining Inspectors

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Annex A

Request for further information under rule 17 of the Infrastructure Planning (Examination Procedure) Rules 2010

Ref	Question to	Question
1. Draft Development Consent Order		
1.1	All local authorities Norfolk Wildlife Trust Suffolk Wildlife Trust Essex Wildlife Trust Natural England	Requirement 11: Biodiversity Net Gain At deadline 6 the applicant submitted a revised draft Development Consent Order (DCO) [REP6030]. In Schedule 3 of [REP6-030] a new requirement 11 on biodiversity net gain has been included. Comments are sought on this additional requirement, including any alterations to any of the wording that you would recommend. SNDC Response Requirement 11 of the Draft DCO requires National Grid to submit their interim and final Biodiversity Net Gain Assessments to the relevant LPA. It is requested that 11(1) is amended to read – ‘<i>with the exception of pre-commencement works, development shall not commence until the interim biodiversity net gain assessment has been submitted to and approved by the relevant local planning authority/lead LPA</i> (in consultation with the relevant LPAs). Other requirements (e.g. the LEMP) include the wording ‘<i>which must be substantially in accordance with the outline landscape and ecological management plan</i>’. As drafted’, Requirement 11 does not so it is not clear what will be submitted to the LPA. There also needs to be provision for monitoring and reporting back to the LPA to ensure that the habitats created deliver the 10% BNG required by the DCO. That said, in line with SNDC current BGP informative, and Summary of responses and government response - GOV.UK SNDC have the below suggestion for wording of the BNG Requirement. (1) <i>With the exception of pre-commencement works, development shall not commence until the interim biodiversity net gain assessment has been submitted to and approved by the relevant local planning authority/lead LPA</i> (in consultation with the relevant LPAs) for

		<i>'The interim biodiversity net gain assessment must:</i> <i>Include details about the qualifications and experience of the ecologists/other relevant professional who have contributed to the development of the plan</i> <i>Include information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat</i> <i>A description of any <u>irreplaceable habitat</u> on the land to which the plan relates</i> <i>Detail bespoke compensatory measures where irreplaceable habitat is lost</i> <i>Clarify the spatial risk multiplier where they cross multiple LPAs</i> <i>Evidence the pre-development biodiversity value of the onsite habitat on the date of submission of the biodiversity net gain assessment</i> <i>(2) Within six months of the date on which the construction period ends for the authorised development, a final biodiversity net gain assessment must be submitted to, and approved by, each relevant planning authority/lead planning authority.</i> <i>The final biodiversity net gain assessment must:</i> <i>Include details about the qualifications and experience of the ecologists/other relevant professional who have contributed to the development of the plan</i> <i>Include information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat;</i> <i>A description of any <u>irreplaceable habitat</u> on the land to which the plan relates</i> <i>Detail bespoke compensatory measures where irreplaceable habitat is lost</i> <i>Clarify the spatial risk multiplier where they cross multiple LPAs'</i> <i>Evidence the pre-development biodiversity value of the onsite habitat on the date of submission of the biodiversity net gain assessment</i> <i>The post-development biodiversity value of the onsite habitat;</i> <i>Details of off-site biodiversity gains including details of the number of habitat, hedge, and watercourse units provided by each habitat provider(s) demonstrating that a minimum 10% net gains have been provided for habitat, hedge and watercourse units.</i> <i>Evidence of the purchase of habitat, hedge and watercourse units from off-site biodiversity gain providers or purchase of biodiversity credits.</i>
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		BNG delivered onsite will be maintained for at least 30 years in line with the management plan to achieve target habitat conditions. Onsite BNG Habitat Management, Monitoring and Reporting Where Biodiversity Net Gain is being provided onsite, then prior to development commencing a Habitat Management and Monitoring Plan (HMMP), prepared (by a suitably qualified and experienced ecologist or other expert) in accordance with the approved interim biodiversity net gain assessment and using Natural England's HMMP template shall be submitted to and approved in writing by the Local Planning Authority/lead LPA (in consultation with the relevant LPAs) for. The HMMP shall include: (a) a non-technical summary; (b) the roles and responsibilities of the people or organisation(s) delivering the HMMP; (c) the planned habitat enhancement and/or creation works to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan and a timetable for their implementation relative to the commencement of development; (d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of habitat enhancements and/or creation works; and Within 28 days of the completion of the habitat enhancement and/or creation works as set out interim biodiversity net gain assessment, a completion report, evidencing the completed habitat enhancements, shall be submitted for approval in writing by the Local Planning Authority. Thereafter the habitats shall be managed, maintained and monitored in accordance with the HMMP to achieve the desired condition to deliver the predicted net gains. The habitat enhancements and/or creation works shall then be implemented in accordance with the approved details. A BNG Habitat Monitoring Report (using Natural England's HMMPT Monitoring Report Template) shall be submitted to the Local Planning Authority/lead authority (in consultation with the relevant LPAs) for approval in years 1, 3, 5, 10, 15, 20, 25 & 30.
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1.3	All local authorities	Validation checklists for discharge of requirement submissions/ requirement 15 of Schedule 3 (Employment and Skills Plan) The ExA draws the attention of all relevant local authorities to the applicant's response to questions 1c and 2b of [REP6-132]. Question 1c relates to the possible use of development validation checklists for the discharge of requirement submissions. The applicant previously responded on this matter in [REP4-303], acknowledging such check lists could be helpful, noted it would be appropriate for drafting to be proposed by the host authorities for its consideration. The applicant advises "No drafting has yet been proposed however the applicant will continue discussions on this matter with the host authorities as it progresses ways of working for the discharge of requirements." All local authorities are asked to signpost where such drafting has been previously provided in examinations submissions or to enter such drafting into the examination. Question 2b concerned the Employment and Skills Plan (ESP) and whether requirement 15 of schedule 3 of the draft DCO should be worded to require the document submitted pursuant to that requirement to be approved by the relevant discharging authorities. In the light of the applicant's comments on this matter, as set out in [REP6-132], the ExA seeks the views of all relevant local authorities on this matter, especially in relation to the tests of necessity, relevance to planning, relevance to the development sought, enforceability, precision and reasonableness in all other respects. SNDC Response With regard to the Employment and Skills Plan, SNDC note the comments raised by the applicant with regard to the necessity of this and its assessment of how reasonable this would be to require an approval of the document. However, SNDC see no reason for having this requirement for just the submission of a document if this then not approved and secured.
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Reference to '**all local authorities**' includes the following: Norfolk County Council (CC), Suffolk CC, Essex CC, South Norfolk District Council (DC), Mid Suffolk DC, Babergh DC, Tendring DC, Colchester City Council, Braintree DC, Chelmsford City Council, Brentwood Borough Council (BC), Basildon BC and Thurrock Council.

1.4	All local authorities who replied to second written question (ExQ2) [PD-023] DCO 2.S3	Outline Code of Construction Practice Appendix E (Community Engagement and Public Information) and Appendix F (Outline Noise and Vibration Management) The applicant responded to ExQ2 questions DCO 2.S3 and DCO 2.S6 in [REP6-115]. Revisions were made to the 'Outline Code of Construction Practise Appendix E - Community Engagement and Public Information' [REP6-078] and the 'Outline Code of Construction Practise Appendix F - Outline Noise and Vibration Management' [REP6-080]. The ExA seeks a response from all local authorities who responded to ExQ2 [PD-023] DCO 2.S3 and DCO 2.S6, regarding the adequacy of the revisions submitted, bearing in mind their previous responses to ExQ2 submitted at deadline 5. SNDC Response The Outline Code of Construction Practise Appendix E - Community Engagement and Public Information is mostly acceptable but does not mention making the complaints log available to the Local Authority, the communication process when the Local Authority will be contacted by the community relations team regarding complaints/issues. The response time of 10 days is not considered to be acceptable. Given the potential construction speed of the pylons, it is likely that the works which had caused the complaints would have finished within this time. It is considered that 48 hours is a more appropriate timeframe (72hrs if the complaint is received on Saturday). The Outline Code of Construction Practise Appendix F - Outline Noise and Vibration Management (4.6.1) states that noise and vibration monitoring will be undertaken but does not state that the locations/duration etc will be agreed with the LA. This needs to be amended to state that the locations will be agreed. Paragraph 4.6.3 states that some locations may not be agreed to monitor noise/vibration as soon as possible. While this is acceptable for unusual circumstances, the LA should be notified as soon as possible of the installation, location and reason for the monitoring.
3. Biodiversity, ecology and the natural environment		
3.1	Applicant All local authorities Natural England	Assessment of impacts on bat species and proposed mitigation In paragraphs 6.1.11 to 6.1.14 of the revised version of the outline LEMP [REP6-084], the applicant has included further details of mitigation measures for bat species.

		To the applicant: For the sake of consistency clarify whether the references made within [REP6084] to “preliminary roost features” are the same as the “potential roost features” references that are stated in the Bat Roost Report [AS-034] and amend accordingly. Furthermore, confirm that all trees that have currently been classified “further assessment required” as per [AS-034] would be assessed in order to determine the presence or absence of potential roost features. Also, justify why the use of a 10% figure for bat boxes and/ or tree veteranisation for trees with potential roost features that you have cited in paragraph 6.1.12 of [REP6-084] would provide an adequate level of mitigation. To all local authorities and Natural England: Comment on whether the amendments made to the revised outline LEMP [REP6-084] now satisfy your concerns in relation to the assessment of impacts on bats and proposed mitigation. This should include whether you think the 10% figure, as proposed in paragraph 6.1.12, would be sufficient. If you have any remaining concerns then please set these out, including what specific actions you consider should be undertaken by the applicant to resolve your concerns. SNDC Response It is requested, in line with Bat Mitigation guidelines, that it be amended to follow a hierarchical approach and provide different % and types of bat box depending on the PRFs lost. Tree roosting bats tend to move roost frequently so the entirety of the tree resource available for bats needs to be considered. Compensation of 10% of trees lost is considered too low (i.e. 10 single bat boxes for every 100 trees lost (trees often contain multiple bat roost features)). The LEMP needs to be clear that consideration will be given to the veteranisation of trees in the first instance, with evidence provided if this is not possible. The following hierarchy is suggested for consideration: For PRF-I where the PRF is only suitable for individual bats or very small numbers)– provision of at least 30%, rather than 10%, of the total number of trees with potential roost features to be removed: • Consider retention of the entire tree • Consider if tree can be partially retained, if yes, then veteranize the tree with 2 -3 features • Consider whether the roost feature be recycled on another tree? If not, then provision of a selection of bat boxes:
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		○ Schwegler 2F bat box, and/or ○ Schwegler 1FF bat box, and/or ○ Schwegler 1FD bat box. For PRF-M, where the PRF is suitable for multiple bats and may be used by a maternity colony, provision of at least 20%, rather than 10%, of the total number of trees with potential roost features to be removed: • Consider retention of the entire tree • Consider if tree can be partially retained, if yes, then veteranize the tree with 4 -6 features • Consider whether the roost feature be recycled on another tree? If not, then provision of a selection of bat boxes: 1. Schwegler 1FF bat box, or 2. Schwegler 1FS or 1 FW Colony Bat Box, and/or 3. Miramare Woodstone Bat box, and/or 4. Schwegler 3FF bat box A plan showing the location of the compensatory roosts needs providing to the LPA. Bat boxes need to be installed by a licensed bat worker as EcOW are not necessarily suitably qualified or experienced to advise on the location.
6. Landscape and visual		
6.2	Applicant All local authorities	Masterplans A number of IPs have made representations at deadline 6 concerning the Masterplans [REP5199]. The ExA acknowledge that these plans have been produced in consultation with local authorities, their draft status, and that such plans are illustrative in nature. The ExA also note the applicant's point of view, as made in ISH4 and restated in [REP6-118] that the provisions within the masterplans are not necessary to make the application acceptable in planning terms. To the applicant: a) While accepting the illustrative nature of the plans, some information submitted from IPs could be usefully incorporated within the masterplans. For instance (but not limited to), Aldham Parish Council [REP6-175] identify a number of veteran trees and notable trees

		from the Woodland Trust Ancient Tree Inventory that do not appear on the constraints plans. Consider whether the plans should be updated and resubmit if necessary. b) The ExA would appreciate further information on the preferred method of the applicant to deal with the matter via an article in the DCO and how this was dealt with in the London Luton DCO (noting the applicant caveat that compensation for residual landscape and visual effects is not required pursuant to the legal and policy framework). To all local authorities: a) Provide your views on the potential mechanism provided by the applicant to provide funding for provision of landscape compensation (as contained in Annex of [REP6-118]). SNDC Response The addition of Schedule 20 into the Draft DCO for landscape compensation proposes to offer payments to the County Council's for off-site tree planting and SNDC support this.
6.4	Applicant All local authorities Norfolk Wildlife Trust Suffolk Wildlife Trust Essex Wildlife Trust	Good design The ExA notes the design review panel (DRP) proposals contained within the DAS [REP6-090] and DASSI [REP6-092] and the provisions for local planning authorities, Dedham Vale National Landscape officials, wildlife trust representatives and North Falls and Five Estuaries project representatives to be invited to meetings where relevant. To the applicant: a) How often is the DRP likely to meet and at what stages of the process will the DRP have input into the design? b) Notwithstanding issues of safety regulation and security, what powers or control or influence will the DRP have and how will this be secured? c) The more formal inclusion of the environmental areas around the cable sealing ends for DRP review would seem useful. A similar table to table 6.1 of the DASSI should be provided in this regard to provide more certainty than currently exists within the DASSI. To all local authorities and the Wildlife Trusts: d) Provide your views on the DRP proposals and any other final comments you wish to make on the subject of good design.

		SNDC Response SNDC having reviewed the DAS and DASSI note that this is primarily aimed at the substations and permanent buildings which do not fall within South Norfolk and therefore we have no comments to make other than the provisions should be specific to which Local Authorities would be involved.
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