

Norwich to Tilbury Development Consent Order Planning Application

Deadline 8 Submission

4th August 2026

This Deadline 8 submission is made on behalf of Tritton Farming Partnership LLP, its members and related parties, parties inter alia; [REDACTED] including; Lowleys Farm, Lowleys (Lyons Hall) Mineral scheme ("TFP").

1. Introduction

1.1. TFP acknowledges the engagement that has taken place between the parties during the Examination and the effort made by National Grid to progress discussions. However, despite the submission of the final signed Statement of Common Ground ("SoCG"), numerous substantive matters remain unresolved. The SoCG confirms that only two matters have been agreed, ten matters remain under discussion, and four matters remain not agreed.

1.2. TFP believes that the outstanding issues are not simply matters that can be deferred to detailed design, future negotiations or compensation discussions. Instead, they raise fundamental questions as to whether the full effects of the Proposed Development have been properly assessed and whether National Grid has demonstrated that impacts on TFP's landholdings have been minimised as far as reasonably practicable. The key outstanding matters are set out below for the Examining Authority's consideration.

1.3 In July 2026, TFP received notices from National Grid seeking access to undertake a range of environmental and other surveys across multiple land parcels, not connected to Route B. TFP is concerned that these surveys are being undertaken so late in the Examination process, particularly where they relate to matters which may inform the assessment of ecological, heritage and environmental impacts. TFP questions how the full effects of the Proposed Development can be assessed with confidence if important survey work remains ongoing at the point the Examination is concluding.

2. Route B Changes Introduced Too Late in the Examination

2.1. TFP acknowledge and welcome National Grid's decision to move to Scenario B in the vicinity of Lowleys Farm. This represents a significant improvement over the previous alignment and reflects concerns consistently raised by TFP regarding impacts upon mineral reserves, housing land and other strategic land interests.

2.2. However, the revised layout was only provided to TFP on 17 June 2026 and was expressly described as "Preliminary and Subject to Change". This revised layout, development boundary and rights is not shown annexed in the Statement of Common Ground between the parties. TFP continues to lack sufficient information regarding:

- Final tower locations;
- Tower heights;
- Conductor sag;

- Permanent access requirements;
- Construction access requirements;
- The final extent of required rights; and
- The extent of any Class 8 reductions.

2.3. The consequence is that neither the landowners nor the Examining Authority have had the opportunity to assess the actual effects of the newly adopted alignment before the close of examination.

2.4. TFP believes that where the Applicant relies upon a material design change to reduce impacts, the resulting scheme should be sufficiently developed to enable those reduced impacts to be properly understood and tested during examination, rather than deferred to post-consent design stages.

3. Mineral Sterilisation Has Not Been Properly Quantified

3.1. The SoCG confirms that National Grid accepts that the Project will materially constrain or prevent the extraction of mineral reserves at Lowleys Farm. It further acknowledges the importance of the mineral resource and the potential for sterilisation.

3.2. TFP remains concerned that no final tower design, tower specification, conductor clearance information, operational restriction details or completed access strategy has been provided. Without those details it remains impossible to determine:

- The true extent of mineral sterilisation;
- The extent of working restrictions beneath conductors;
- The effect of permanent access routes;
- The viability of future mineral extraction operations; and
- The effectiveness of the proposed mitigation measures.

3.3. The Applicant repeatedly relies upon future detailed design and future engagement to address these matters. However, TFP believes that neither the Examining Authority nor affected parties should be expected to defer consideration of potentially significant impacts until after a Development Consent Order has been granted.

4. Excessive Development Boundary and Failure to Secure Class 8 Reductions

4.1. One of the principal benefits with National Grid adopting Scenario B was the reduction in impacts on the mineral resource.

4.2. TFP remains concerned that the enlarged development boundary on TFP land, designed to accommodate both Route A & Route B, continues to include substantial areas of land no longer required for either the adopted alignment or associated infrastructure. The position is particularly acute, but not limited to, around Plot F-3/5 and the land surrounding the proposed A131/Chelmsford North East Bypass roundabout.

4.3. The Applicant has suggested that reductions in land rights may occur through detailed design and future contractual undertakings. However, those undertakings have not been produced, defined or tested during examination. TFP therefore believes that they cannot be given substantial weight.

4.4. TFP remains of the view that any reduction in rights arising from the adoption of Scenario B should be secured before the close of examination rather than left to future processes. These development boundaries are at present excessive and unnecessary.

5. Access Rights Remain Excessive

5.1. Significant concerns remain regarding both temporary and permanent access arrangements. These include:

- Access across strategically important development land;
- Access routes through operational large farm areas and storage and within a few metres of the listed farm manager's house;
- Routes which sterilise future mineral, agricultural and development opportunities;
- Failure to utilise potentially less harmful alternatives; and
- Continuing uncertainty regarding long-term maintenance access requirements.

5.2. TFP remains willing to work with National Grid to identify access arrangements that allow both developments to coexist. However, those discussions remain unresolved.

6. Alternative Route Assessment

6.1. TFP continues to maintain that alternative route options have not been fully appraised and remains concerned that the rationale for selecting the proposed alignment in preference to other potentially less harmful alternatives has not been adequately demonstrated.

6.2. In particular, TFP remain concerned that the Applicant has not adequately demonstrated why alternative alignments associated with Great Waltham and the wider TFP landholding would not provide a more appropriate solution having regard to:

- Compliance with the Holford Rules and SHETL clarifications;
- Mineral sterilisation;
- Heritage impacts;
- Housing sterilisation;
- Landscape impacts and
- Commercial impacts.

6.3. While TFP acknowledges the Applicant's position on alternative route consideration, they remain unconvinced that all relevant factors have been fully assessed. TFP has asked for transparency on Great Waltham Alternative Route suitability and Holford Rules compliance but received no analysis.

6.4 TFP remains concerned that alternative solutions, including offshore or partially offshore alternatives, have not been sufficiently researched and analysed, having regard to the significant landscape, heritage, land use and commercial impacts associated with the proposed overhead alignment. While TFP recognises that the Applicant has assessed alternatives, it remains unconvinced that all reasonable alternatives have been fully and transparently evaluated and predominantly settled for 50+ year old technology over land.

7. Surveys

7.1 TFP is surprised that, during the second half of July 2026 and with the Examination approaching its conclusion, it received notices from National Grid seeking access to undertake a range of both intrusive and non-intrusive surveys across multiple land parcels within the TFP ownership. These surveys include, amongst others, preliminary ecological assessments, arboricultural surveys, protected species surveys including bats, otters and badgers, habitat assessments and heritage-related investigations. This is not related to Route B adoption and covers a large area.

7.2 Many of the features that are now the subject of survey work have been known to National Grid for a considerable period and have previously been identified by TFP during engagement with the Applicant. TFP has also consistently raised concerns regarding environmental, landscape and visual impacts across its landholding.

7.3 TFP is concerned that the need for survey work at such a late stage raises questions as to whether the Applicant has compiled a sufficiently complete evidence base for the Examining Authority to fully assess the impacts of the Proposed Development on TFP's land. This is particularly relevant given the presence of environmentally sensitive areas within the landholding, including a Site of Special Scientific Interest.

7.4 Whilst TFP acknowledges that some surveys may be required to support detailed design and implementation, it is unclear why a large number of baseline surveys are only now being undertaken as the Examination draws to a close. TFP is concerned that the findings from these surveys have not been available to Interested Parties or the Examining Authority during the Examination process.

7.5 TFP therefore respectfully submits that the Examining Authority should carefully consider whether sufficient information is available to reach a fully informed conclusion on the environmental, ecological and heritage impacts affecting TFP's landholdings, or whether important elements of the assessment remain dependent upon work that has yet to be completed

8. Conclusion:

8.1 TFP remains concerned that the Examination is concluding whilst a number of fundamental matters remain unresolved. National Grid continues to rely upon future detailed design, future surveys and future engagement to address issues that materially affect TFP's land holdings and possibly many other Affected Parties.

8.2 Whilst TFP acknowledges the changes made through the adoption of Scenario B and the engagement that has taken place during the Examination, the final design remains insufficiently developed to enable the consequences for minerals, future development potential, access arrangements and land requirements to be fully understood.

8.3 TFP respectfully submits that the Examining Authority should give significant weight to the unresolved matters identified within the SoCG and carefully consider whether sufficient information is available to conclude that the impacts of the Proposed Development on TFP's interests have been minimised as far as reasonably practicable.