

Eastern Green Link 3 and Eastern Green Link 4 EN0210003

Section 51 Advice Log Version: 19 August 2026

This document comprises a record of the s51 advice that has been given by the Planning Inspectorate to the applicant (National Grid Electricity Transmission) during the pre-application stage. It will be updated by the Planning Inspectorate after every interaction with the applicant within which s51 advice has been given.

The applicant will always be given the opportunity to comment on the Planning Inspectorate's draft record of the s51 advice given before it is published on the relevant project page on the [Find a National Infrastructure Project website](#).

The role of the advice log at the acceptance stage

Section 55(4) of the PA2008 requires the Planning Inspectorate to consider, amongst other things, the extent to which the applicant has had regard to the s51 advice given by the Planning Inspectorate in connection with the application when deciding if the application can be accepted for examination. Section 51 advice includes:

- advice given about applying for an order granting development consent
- advice given about making representations about an application for an order granting development consent

The applicant will use this advice log as the tool for demonstrating:

- regard to the s51 advice given to the applicant by the Planning Inspectorate
- regard to any s51 advice given to others by the Planning Inspectorate

The applicant will submit a final version of this advice log which demonstrates regard to all s51 given by the Planning Inspectorate at the pre-application stage as part of the application.

Eastern Green Link 3 and Eastern Green Link 4 – Applicant meeting index

Date of meeting	Meeting overview
<u>23 May 2024</u>	Inception Meeting (published as separate document)
<u>16 September 2024</u>	Project Update meeting (published as separate document)
<u>30 October 2024 - Email</u>	Feedback on Programme Document
<u>01 April 2025</u>	Update on proposed Statutory Consultation Preparation
<u>05 June 2025 - Email</u>	Applicant website
<u>04 September 2025</u>	Post Statutory Consultation Project Update Meeting
<u>27 October 2025</u>	Post meeting advice
<u>27 October 2025</u>	Update to Pre-application Services
<u>25 February 2026</u>	Project Update meeting
<u>02 July 2026</u>	Project Update meeting/ Draft document review
<u>17 July 2026</u>	Email advice regarding Planning and Infrastructure Act 2025

Eastern Green Link 3 and Eastern Green Link 4 – Log of s51 given to the applicant

Meeting date: 30 October 2024

Topic	s51 advice given	Applicant regard to s51 advice given
Email containing feedback on Programme Document	The applicant supplied the Inspectorate with its initial Programme Document in line with the Expression of Interest process after the publication of the 2024 Pre-application Prospectus. Having reviewed the document, the Inspectorate considers that it satisfactorily covers the expected content as set out in the government's pre-application guidance at paragraph 10, namely: • “the date the applicant intends to submit their application • a comprehensive timetable of the applicant's pre-application process, the main events with dates and milestones demonstrating how the pre-application process will be completed (using the maximum target of 2 years as a benchmark)	Demonstration of regard

	• the applicant's view on the main issues for resolution and activities they will undertake to address those • the applicant's proposals for engaging with statutory consultees and local authorities during the pre-application period and any intended financial support agreements, such as Planning Performance Agreements (PPAs) • the applicant's identification of risks to achievement of the pre-application stage and the process by which these risks are tracked and managed • cross references to the SoCC required by section 47 of the Planning Act". The Programme Document provides enough detail about the proposed development, timetable and activities for the pre-application process, as well as the applicant's approach to engagement with statutory consultees and other parties. It would be helpful, despite the application being at an early stage, if the applicant provided a clearer estimate for which quarter in 2026 the application is currently intended to be submitted in. It would also be helpful if the applicant included a better indication of activities that will be undertaken to	
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	track and manage risks in the next iteration of its document.	
Meeting date: 01 April 2025		
Topic	s51 advice given	Applicant regard to s51 advice given
Programme Document	The Inspectorate queried the applicant on the publishing of its next iteration of the Programme Document and the applicant confirmed that it will be publishing in approximately two weeks. The Inspectorate advised the applicant to include regard to the responses on the Statement of Community Consultation (SoCC) from the local authorities in the Programme Document. The Inspectorate also advised to include pictures and maps within the Programme Document to help understand the context, the proposed route, optionality and order limits. It was also suggested that a map be included to show where the project crosses between the England and Scotland border. The Inspectorate also advised to include the consultation materials being used for the statutory consultation in the programme document with the hyperlinks for easy access.	Demonstration of regard
Transboundary Screening	The Inspectorate updated the applicant that it will be undertaking the transboundary screening and will update the applicant before it intends to	

	start its Statutory Consultation in May 2025 so that applicant can go to European countries, if identified, at the same time as statutory consultation.	
New Flood Risk and coastal erosion data from EA	The Inspectorate advised the applicant that it should get advice from their flood risk advisors regarding the new national flood and coastal erosion risk information from the Environment Agency (EA) to consider any implications before the applicant commences statutory consultation.	
Assessments	The Inspectorate advised to consider the Environmental Targets (Fine Particulate Matter) Regulations 2023 regarding the assessment of PM_{2.5}. The Inspectorate also highlighted the requirement of the Levelling-up and Regeneration Act 2023 (LURA) to further Protected National Landscapes and advised the applicant to demonstrate how the applicant has considered this when submitting the proposed application.	
NSIP Commitments register / S42 documents	The applicant questioned if the Commitment Register should be submitted at the s42 stage and whether the Inspectorate would like to receive it all in the bundle or separately to which the Inspectorate confirmed that the information sent to the Inspectorate should be the same as	

	sent to the statutory consultees. The Inspectorate to confirm whether it needs the information in the spreadsheet format.	
River Transport Option Assessment	The Inspectorate advised the applicant to ensure there is enough information in the PEIR and it is progressed enough to have consultation on it, considering whether further consultation is required and recommended seeking advice from the statutory consultees on this.	
Cumulative and combined assessments	The Inspectorate advised the applicant that that there has been, in relation to some cases, a conflict between the Natural England and Inspectorate's tiering of cumulative and combined assessments, which if not explored and addresses can take up a lot of examination time and it would be beneficial if the applicant can agree the baseline positions before it submits the application.	
Adequacy of Consultation Milestone (AOCM)	The applicant questioned whether it would be appropriate to submit the AOCM document in Q1 of 2026 with anticipated submission in summer 2026. The Inspectorate confirmed that the guidance is to submit the AOCM three months before the anticipated submission date and it would be happy to have it early, but it should include statement from the local authorities confirming the consultation was adequate. The Inspectorate also advised to	

	inform the local authorities that it will be submitting this information to the Inspectorate.	
Electronic Application Index	The applicant queried if the Inspectorate still need the electronic application index at the submission of the application to which the Inspectorate confirmed that it is still required to be submitted.	
AI use guidance	The applicant asked whether there was any guidance on the use of AI and the Inspectorate signposted to some published guidance and suggested having this as a standing agenda item in future meetings.	
GIS Shapefile	The applicant queried whether it should submit the GIS Shapefile again to the Inspectorate as it has changed since last submitted at the scoping stage, to which the Inspectorate confirmed that the applicant should only submit this once the project is finalised with changes prior to the submission of the application.	
Draft Documents	The applicant confirmed that draft documents will be submitted next year, and the Inspectorate advised that the draft documents should only be submitted once they are to a satisfactory standard. The applicant also queried whether draft documents should be shared with the statutory consultees. The Inspectorate advised	

	that the applicant should consider sharing the draft documents with the stakeholders. The guidance is set out in the pre-application prospectus.	
Meeting date: 05 June 2025		
Topic	s51 advice given	Applicant regard to s51 advice given
Applicant Website	The Inspectorate advised the applicant that on its website the Programme Document was under a heading of 'PINS documentation' and advised the applicant that this could be renamed to encourage other parties using the website to engage with the document.	
Meeting date: 04 September 2025		
Topic	s51 advice given	Applicant regard to s51 advice given
Draft documents	The Inspectorate advised that the draft documents should be substantially complete to enable meaningful feedback and should be submitted in a single batch. The applicant is planning to submit the draft documents in April 2026, but this can change based on documents readiness. The Inspectorate suggested applicant to provide a list of statement of common ground	

	documents to be submitted along with the document status with draft documents. The applicant noted this request but noted that this would be subject to stakeholder agreements. A review meeting may be arranged after the draft documents review if requested by the applicant.	
Programme Document	The Inspectorate advised that in relation to future meetings leading up to submission, that these be listed in the programme document so that they can be scheduled ahead of time. It was requested that it is helpful for the applicant to submit a tracked changed version of the programme document when it is updated.	
Issues Tracker	The applicant shared their issues tracker with the Inspectorate. The Inspectorate recommended that the applicant consider including a RAG colour code, which corresponds with the tracker i.e. Green, Amber and Red, which confirms the rating of the issue, the applicant confirmed that they will update accordingly. The Inspectorate advised that the tracker will not be published on the website.	
HRA process	The Inspectorate advised applicant to look at the North Sea Offshore Wind Farm (OWF) applications submitted to Secretary of State (SoS) in the last year. The applicant can see	

	what matters were discussed and the outcome before it submits the DCO application. The applicant was advised to look at different OWF's to see how the developers have approached HRA mitigation and compensation and SoS's responded as a result.	
Consultation report and ES	The Inspectorate advised the applicant to document the host authority changes clearly in the Consultation report. It should also be noted and clarified in the ES that scope of the application remains unchanged.	
Hedgerow Assessments	The Inspectorate confirmed that categorising all hedgerows as important is likely to be acceptable as baseline classification, noting that this should in theory provide a worst-case scenario. The Inspectorate did however advise for the applicant to consider how this approach to the baseline interacts with Biodiversity Net Gain (BNG) calculations. The Inspectorate advised the applicant to clearly explain the hedgerow survey limitations especially where stretches of hedgerow surveyed have not be surveyed. In relation to an example of a hedgerow assessment, the applicant was advised that this had been submitted on a number of applications such as the Cambridge Wastewater DCO.	

Agricultural Land	The applicant queried, following the issuing of the scoping opinion, what further information the Inspectorate would require to scope out temporary loss of agricultural land during the maintenance phase. The Inspectorate advised the applicant to clearly demonstrate and provide information on the likely maintenance activities that would be carried out. Applicant was advised to ensure DCO drafting matches in relation to activities described in the ES to avoid ambiguity. Enough details should be provided to demonstrate that effects are insignificant.	
Biodiversity Net Gain (BNG)	The Inspectorate advised that the BNG regulations may evolve until submission and applicant was asked to be prepared to explain how its matrix aligns. The Inspectorate suggested having this as a standing agenda item in future meetings as this was a matter that both the applicant and the Inspectorate would need to consider as new guidance is published.	
AI user guidance	The Inspectorate confirmed no changes to guidance and suggested having this as a standing agenda item in future meetings.	
Meeting date: 27 October 2025		
Topic	s51 advice given	Applicant regard to s51 advice given

United Nations Convention on the Laws of the SEA (UNCLOS) and the Section 81 exemptions in the Marine and Coastal Access Act 2009 (MCAA)	The applicant set out in its presentation that in its view, under the United Nations Convention on the Laws of the Sea (UNCLOS) and s81 of the Marine and Coastal Access Act 2009 (MCAA), cable installation beyond 12 nautical miles (NM) is exempt from requiring a marine licence and that the deemed marine licence (DML) within the development consent order (DCO) would be structured to reflect licensable activities within and outside of 12 NM. The Inspectorate deems that the applicant should seek its own legal advice on the drafting of the deemed marine licence. However, regardless of the consenting strategy, the Environmental Statement should assess any likely significant effects arising from the installation of the cable as part of the proposed development, including cumulative effects as relevant.	
lessons learnt from other DCOs using PINS commitments register template	There are no clear lessons learnt as the component has not been included in applications for a sufficient period of time. The applicant however should ensure that as many securing mechanisms are in place as possible and where these are not in place, the applicant should be clear in providing justifications and reassurances that these are realistically able to be secured for confidence to be had in the measure. The Inspectorate would encourage the applicant to follow published guidance and	

	therefore submit the commitments register as a separate appendix to the ES.	
lessons learnt to achieve proportionality and avoid repetition between documents	As noted above, this register is a relatively recent addition to applications and therefore whilst unable to identify lessons learnt, the Inspectorate encourages the applicant to consider the use of cross referencing to avoid duplication but also discuss approaches with the parties responsibility for using and discharging measures and requirements to which the documents relate. Consideration of who will be using the documents, how and when should inform the drafting.	
Email Update: 27 October 2025		
Topic	s51 advice given	Applicant regard to s51 advice given
Pre-application Prospectus update	Following a 6-month review of our services, our Pre-application Prospectus has been updated: 2024 Pre-application Prospectus. The update log at the bottom of the page summarises the changes and clarifications that have been applied. As an applicant with a live project at the pre-application stage of the process, please familiarise yourself with the update and consider how it might affect your pre-application programme and interaction with our services.	

	Please note in particular: the establishment of land and rights negotiations tracking as a primary service feature – this means it is now expected for all applicants to develop and share a land and right negotiations tracker in 1 of 2 available templates, irrespective of the service tier they have subscribed to clarified expectations of applicants when preparing to interact with the Inspectorate at meetings – including clarified rights for the Inspectorate to delay or refuse service where pre-meeting expectations are not upheld e.g. an updated programme document or issues tracker is not provided, on time, to inform a meeting agenda	
Meeting date: 25 February 2026		
Topic	s51 advice given	Applicant regard to s51 advice given
Adequacy of Consultation Milestone (AOCM)	The Inspectorate advised that it would be preferable for the AOCM to be submitted concurrently with the draft documents to support an efficient review process. However, it is recognised that programme constraints may limit the ability to achieve this alignment.	

Targeted consultation/ Consultation Report	The Inspectorate advised the applicant to clearly document the forthcoming targeted consultation within the Consultation Report, including clarification of any local authority boundary or responsibility changes occurring during that period and stakeholder engagement. The Inspectorate also reminded the applicant to re-run the GIS shapefile, considering land parcel changes, to ensure that no statutory consultees are omitted.	
DCO submission	The Inspectorate advised the applicant to reconsider an August submission, as it overlaps with the school summer break and may create resourcing challenges for the Inspectorate and some local authorities. The Inspectorate iterated the need to keep the Inspectorate updated on the potential date nearer the time. It also reiterated the need to inform/update relevant Local Authorities and stat bodies on the applicants anticipated submission date.	
Review of reports	The Inspectorate recommended that the applicant review the most recent recommendation reports and decisions made by the Secretary of State on projects when considering their own strategies. The applicant confirmed that this approach is already being undertaken.	

Issues Tracker	The Inspectorate advised the applicant to include anticipated timeframe of resolution of the issues with statutory parties/ stakeholders which will help the appointed Examining authority during Examination.	
Biodiversity Net Gain (BNG)	The Inspectorate advised that in the absence of published guidance for NSIPs on BNG, that the applicant should seek to adhere to the latest draft guidance in the preparation of the application.	
In-combination assessments/ HRA	The Inspectorate advised the applicant to seek agreement with Natural England on issues such as assessment of waterbird assemblage in addition to individual species and to continue recognising and proactively managing these matters. The Inspectorate requested a concise overview of applicants HRA position at the next project update meeting. Additionally, Inspectorate advised to ensure that HRA is procedurally robust. For example, ensuring that an assessment of likely significant effect does not rely on mitigation to rule out effects. Mitigation should be applied at stage two in assessing adverse effects on integrity.	
Land rights tracker	The Inspectorate advised the applicant to provide an issues tracker alongside the land	

	rights tracker, noting that the two documents are interdependent. It also requested that the land rights tracker reflects the parcels of lands as identified within the draft BoR, when these are submitted for feedback.	
Letter of No Impediment (LoNI)	The applicant queried whether the LoNI could be submitted during the examination rather than at application. The Inspectorate advised that providing a transparent position at application would clarify when consents and licences are likely to be agreed. Updates should then be provided during the examination on matters resolved and outstanding.	
Environmental Mitigation and Commitments Register (EMCR)	The Inspectorate advised that it is preferred that the REAC is submitted as standalone document and not as an appendix to any document. This is because it is a standalone document which cross refers across the application and is often updated throughout the examination. The applicant is reminded that during examination the statement of common ground will be frequently revised and therefore the applicant should consider submitting the outline management plans and statements of common ground as standalone documents.	

Structure of the Environmental Statement (ES)	The Inspectorate was content for each technical chapter to not include a full planning policy section but that this information should be included and cross-references within the wider ES.	
Decommissioning	The applicant set out that decommissioning effects of the proposed development were to be address in the offshore EIA chapters but not the onshore EIA chapters. The Inspectorate advised that the EIA should demonstrate the likelihood on significant effects during decommissioning and any mitigation in place before scoping this out of the ES.	
Transboundary effects	In response to the applicant's query, the Inspectorate advised the applicant to justify in the application documentation where transboundary effects have not been assessed. This should be based on the absence of transboundary effects.	
Construction scenarios in ES chapters	In response to the applicant's query regarding the onshore ES chapter not assessing alternative construction scenarios, the Inspectorate advised that the assessment should demonstrate the realistic worst-case scenario for each identified impact has been assessed.	

Ornithology	The Inspectorate confirmed, following an update on matters pertaining to HRA and Red-throated diver, that in the absence of agreement of conclusions on adverse effects on integrity with SNBCs, that including a without prejudice outline plan (e.g. a vessel management plan, construction environmental management plan or similar) to secure a potential seasonal restriction mitigation measure would be suitable. This matter could then be examined by the appointed examining authority.	
AI guidance	The Inspectorate has emailed applicant the updated Inspectorate AI guidance which can be found here: Use of artificial intelligence in casework evidence - GOV.UK Procedural Guide: Planning appeals – England - GOV.UK	
Draft Document Review		
Topic	s51 advice given	Applicant regard to s51 advice given
Feedback	Please refer to the Draft Document Review table for detailed feedback, which can be found at the following link: Advice regarding draft application documents	

Meeting date: 02 July 2026		
Topic	s51 advice given	Applicant regard to s51 advice given
Biodiversity Net Gain (BNG)	In responding to the applicant's query on BNG, the Planning Inspectorate advised that any voluntary commitment to deliver 10% BNG should be assessed and evidenced using the relevant methodology and metric as though the requirement was mandatory. The Inspectorate also advised the applicant to continue engagement with Natural England (NE) and relevant local authorities on BNG methodology and its proposed proportionate and targeted approach. The applicant should seek agreement where possible before submission. The applicant was advised to consider the implications of submitting the BNG plan after DCO submission, particularly whether consultees would be disadvantaged by not having the information at relevant representation stage. The applicant should also consider whether the BNG material could constitute further environmental information to trigger further consultation, noting it is not part of the Environmental Statement.	
Submission of documents in pre-examination	The Inspectorate advised that documents submitted in response to Section 51 advice	

	following the acceptance stage are likely to be accepted as additional submissions. However, the acceptance of any submissions made during pre-examination remains a matter for the Examining Authority's (ExA) discretion.	
Environmental Statement (ES)	The Inspectorate advised the applicant to clearly set out in the ES where agreement with local authorities has been reached on the long and short list of cumulative development.	
Statements of Common Ground (SoCG)	In response to applicant's comments that it will be providing some of the SoCGs with the application, the Inspectorate advised the applicant to consider including a timeline for providing outstanding SoCGs within its application, such as in the planning statement or PMIE (Potential Main Issues for Examination) as it may reduce the number of examination questions or requests from the ExA (as SOCGs are typically being requested between certain parties before examinations commence).	
Principal Areas of Disagreement Summary Statements (PADSS)	Post Meeting advice: It is not for the applicant to dictate the form or content of PADSS as they are owned and controlled by the statutory body. The prospectus states the relationship between PADSS and them aiding the IAPI later:	

	<i>“The function of the PMIE (along with PADSS) is to demonstrate that there are sufficiently few and uncomplex residual issues to potentially allow for a 4-month examination to be timetabled (in fast-track procedure cases) and/or to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties. In the enhanced tier service, a multiparty meeting may be convened by the applicant to assist finalisation of the PMIE.”</i> The Prospectus also explains the relationship between PADSS and the issue trackers and the role each document plays. PINS view on reducing PADSS to a "tracker form" is that this wouldn't fulfil the requirement at DCO Submission: <i>“The applicant’s issues tracker must consolidate relevant areas of disagreement established in PADSS, enabling PADSS to also inform the potential main issues for the examination. Pre-application PADSS must be retrieved from affected consultees by the applicant and provided with the submitted application.”</i> PADSS are promoted within PINS services because they have been proven to assist ExAs and therefore all parties in the examination of an NSIP. The new pre-application guidance consciously gives flexibility to applicants about	
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	the range of tools they can use to track issues and, on that basis, there could be scope to absorb the functions of PADSS in a broader approach to issues tracking. To fulfil the equivalent function to PADSS, other parties would need to be able to contribute to the tracker directly without any editorial influence by the applicant.	
Adequacy of Consultation Milestone (AoCM) Feedback	The applicant's Adequacy of Consultation Milestone (AOCM) statement has been prepared and submitted having had regard to the government's statutory guidance on the pre application stage as well as the Inspectorate's Pre application Prospectus. Having reviewed the applicant's AOCM statement, the Inspectorate considers that it sets out clearly the applicant's consultation activities undertaken to date, confirms the approaches set out in the applicant's Statement of Community Consultation (SoCC), and summarises the consultation responses and the way in which they are shaping the application. The Inspectorate's comments on the applicant's AOCM statement are made without prejudice to any decision on whether to accept the application for examination.	

Cable Protection comments from Draft document review (Table 4-2)	The Inspectorate advised the applicant to seek agreement with relevant statutory consultees where possible that the cable protection assessment represents a reasonable worst-case scenario, noting final quantities are likely to be agreed post a consent being given. This has been a matter of some discussion in previous offshore schemes.	
Schedule of negotiations/ Land Rights and Negotiations Tracker	In response to applicant's query, the Inspectorate confirmed that the Schedule of Negotiations is required, while the land rights/ negotiations tracker is a supporting tool which is updated throughout the Examination.	
Mitigation land	The Inspectorate advised the applicant should exercise caution around any post-submission changes to mitigation land, particularly where changes may affect the Order Limits and the compulsory acquisition regulations which may require a formal change request. If a change request is submitted, it will need to be considered by the ExA.	
UK Power Networks (UKPN)	The Inspectorate advised the applicant to clearly distinguish the works forming part of the DCO application and any related works to be consented separately, while ensuring any environmental interactions are appropriately assessed in the ES.	

Application submission/ DCO Portal	The Inspectorate advised the applicant to ensure submission is made before 5pm on the intended submission date, as documents received after 5pm may be treated as submitted the following day in relation to the calculation of the statutory timeframe for acceptance. Details on the DCO portal will be included in the pre-submission letter.	
Email advice: 17 July 2026		
Topic	s51 advice given	Applicant regard to s51 advice given
Planning and Infrastructure Act 2025 updates	In light of the amended legal framework which will be introduced from 24 July 2026 by the Planning and Infrastructure Act 2025, the Planning Inspectorate issued written advice to the applicant on [date of letter] requesting for: - evidence within the submitted application in relation to duties under s46 and s48 of the PA2008 to be provided as an appendix to any engagement summary document that the applicant may choose to submit or, where the applicant chooses not to submit such a document, as a discrete document titled 'Section 46 and section 48 information' - evidence within the submitted application in relation to new s55(4)(e) of the PA2008	

	to be provided in a submission version of this expanded advice log template.	
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Eastern Green Link 3 and Eastern Green Link 4 – Log of s51 advice given to others		
Person s51 advice given to	s51 advice given	Applicant regard to s51 advice given
Name and/or organisation	Summary of s51 advice given and link to advice register	Applicant to complete