

12 August 2026

The National Grid Electricity Transmission plc (Pelham to Rayleigh
Overhead Line Reinforcement) Compulsory Purchase Order 2026

The Electricity Act 1989 and The Acquisition of Land Act 1981

Statement of Case of the Acquiring Authority for the purpose of upgrading
a section of overhead line in the East Anglia Region by way of
reconductoring the existing Quad Zebra conductors to Triple Araucaria
between Pelham, Twinstead Tee, and Rayleigh

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Statement of Case of the Acquiring Authority for making of the Order

1. INTRODUCTION

- 1.1 This document is the Statement of Case of National Grid Electricity Transmission plc (company registration number 02366977) (**NGET**) prepared in connection with The National Grid Electricity Transmission PLC (Pelham to Rayleigh Overhead Line Reinforcement) Compulsory Purchase Order 2026 (the **Order**) made on 21 May 2026.
- 1.2 If confirmed by the Secretary of State for Energy Security and Net Zero (**Secretary of State**) (or if applicable under powers delegated by the Secretary of State to NGET), the Order will enable NGET to acquire compulsorily the rights included in the Order (**Order Land**) which are required in order to upgrade a section of overhead line in the East Anglia Region by way of reconductoring the existing Quad Zebra conductors to Triple Araucaria between Pelham, Twinstead Tee, and Rayleigh (the **Project**). The Project includes works to one side of the existing towers by upgrading the existing conductors (wires) along one of the two circuits, replacing them with advanced, higher-capacity conductors without replacing the structure itself. The Order Land is described in this Statement and shown edged in red and coloured blue on maps which form part of the Order (**Order Maps**).
- 1.3 This Statement of Case (**Statement**) is based upon the Statement of Reasons which was a non-statutory statement provided in compliance with Section 14 of the Guidance on the Compulsory Purchase Process (January 2025) which was subsequently updated in June 2026 (after the CPO was made) (**Guidance**). Paragraph 37 of the Guidance confirms that it is possible to use the Statement of Reasons as a basis for this Statement. This Statement has been prepared in accordance with the Compulsory Purchase (Inquiries Procedure) Rules 2007 due to the fact that an inquiry (**Inquiry**) is proposed to be held into the Order.
- 1.4 This Statement sets out NGET's justification for promoting the Order and explains why, in NGET's opinion, there is a compelling case in the public interest for compulsory purchase powers to be confirmed. This Statement also addresses the objections which have been made to the Order.
- 1.5 Notices publicising the making of the Order appeared in the Essex Chronicle, the Colchester Gazette and the Basildon Echo dated 21 May 2026 and 28 May 2026 as well as in the Bishop's Stortford Independent on 27 May 2026 and 3 June 2026 (being one or more local newspapers circulating in the locality). Notices were also erected on the Order Land and land to be subject to the Order rights notifying the making of the Order. The period for submission of any objections to the Order expired on 19 June 2026. By that date, 82 objections had been made to the Secretary of State.
- 1.6 On 1 July 2026, the Secretary of State gave notice to the Acquiring Authority (NGET) that the Inquiry would be held in respect of the Order. Under Rule 7 of the Compulsory Purchase (Inquiries Procedure) Rules 2007, the Acquiring Authority is required to send the Secretary of State and all remaining objectors its Statement of Case. This document is the Acquiring Authority's Statement of Case.

2. POWERS UNDER WHICH THE ORDER IS MADE

- 2.1 This Order was made pursuant to section 10 of, and Schedule 3 to, the Electricity Act 1989 (**1989 Act**), and having regard to the Guidance. Section 10 of the 1989 Act provides that the powers in Schedule 3 (which provides for the compulsory acquisition of land) have effect in relation to the holder of a transmission licence. NGET is the holder of an electricity transmission licence granted pursuant to section 6(1)(b) of the 1989 Act. As such, NGET is empowered to exercise powers of compulsory acquisition in England and Wales under the 1989 Act.

2.2 Paragraph 1(1) of Schedule 3 to the 1989 Act provides that:

"the Secretary of State may authorise a licence holder to purchase compulsorily any land required for any purpose connected with the carrying on of the activities which the licence holder is authorised by the licence to carry on."

2.3 Paragraph 1(2) of Schedule 3 to the 1989 Act confirms that "land" includes any right over land, and that the Secretary of State's power includes power to authorise the acquisition of rights over land by creating new rights, as well as acquiring existing ones. This includes the creation of rights equivalent to an easement and "restrictive rights" akin to restrictive covenants.

2.4 By section 9(2) of the 1989 Act, the holder of a licence authorising them to participate in the transmission of electricity is charged with the duty *"to develop and maintain an efficient, coordinated and economical system of electricity transmission"*.

2.5 NGET is taking a proportionate approach to compulsory acquisition and, rather than seeking to acquire the freehold title to any of the Order Land it is seeking the acquisition of rights as described in more detail in section 5 below.

3. THE PROJECT

3.1 Location and description of the Project

3.1.1 The current network is from Pelham, through Twinstead and Braintree to Rayleigh. This section is currently comprised of 'Quad Zebra' conductors, and is the section identified for upgrading to 'Triple Araucaria' within this Project. The upgraded conductor will be strung to 278 existing towers. It is a critical project within NGET's RIIO-ET3 business plan and will support the increased power generation from regional generation sources.

3.1.2 'Quad Zebra' refers to an overhead line configuration using four 'Zebra' conductors per phase. These are standard conductor types widely and historically used in UK transmission networks. 'Triple Araucaria' is a later-generation, high-capacity alternative that uses three bundled conductors per phase with incremental improvements in thermal and mechanical performance. Those refinements allow comparable or greater current-carrying capability within existing design envelopes, offering enhanced resilience.

3.1.3 The upgrade to 'Triple Araucaria' allows operation at higher temperatures without excessive sag, enabling greater ampacity (maximum continuous electrical current) within existing tower clearances. The upgrade increases the thermal rating and overall power transfer capability without needing to rebuild towers and reduces maintenance, whilst improving resilience due to a higher strength-to-weight ratio.

3.1.4 Further advantages to the upgrade include an overall carbon reduction as there are fewer conductors meaning less material and lower embodied carbon as well as the re-use of existing towers.

3.1.5 Between Twinstead and Rayleigh, the Project represents the upgrading of conductors along one side of the existing towers. The network is made up of 400kV double circuit overhead lines, all of which are, or will be upgraded to triple Araucaria (3x700mm²). See Figure 1 below.

Figure 1 - Uprated Lines						
End Points / Circuit Identifier	Voltage (kV)	Approximate Length (km)	Construction Type	Conductor Type & Operating Temp	Post-Fault Continuous Rating (Amps/MVA)	Circuit Phasing
A645 Braintree – Pelham – Rayleigh Main 4VB94B – 4VB001	400	33.03	L6 / L12	3x 700mm ² AAAC Araucaria conductor 75°C	Winter: 3820MVA Spring: 3630MVA Summer: 3320MVA	Existing
A646 Braintree – Pelham - Rayleigh 4VB94B – 4YL192B	400	65.94	L6	3x 700mm ² AAAC Araucaria conductor 75°C	Winter: 3820MVA Spring: 3630MVA Summer: 3320MVA	Existing

- 3.1.6 No new overhead line construction is required for the Project, reducing impact so far as possible on local stakeholders. Overhead line fittings will be upgraded from twin fittings to triple fittings that can accommodate the new triple conductor type; this upgrade will be performed as part of the Project, alongside 7 required upgrades to foundations and 180 repairs or replacements of muffs. Muffs are the thick concrete supports which bear the weight of the foundations and are the interface between the pylon and the earth. The Project will require NGET to access land for tower maintenance and reconductoring.

3.2 Interface with other NGET projects

- 3.2.1 The Project has interfaces with the Bramford to Twinstead Reinforcement which is an update to the electricity transmission network between Bramford substation in Suffolk and Twinstead Tee in Essex through the construction of a new overhead line and underground cable (**BTNO**). BTNO was granted a Development Consent Order by the Secretary of State on 12 September 2024. The Project intends to utilise common system access windows and potentially a common works contractor. As part of the Project design, the consented BTNO access routes (for which NGET has secured compulsory acquisition rights if required) have also been included within the Order limits in a proportionate manner, to ensure that the delivery of the Project is not impeded in the event of any delay to the BTNO programme.
- 3.2.2 BTNO is a major new 400 kV double line which connects Bramford to the east to Twinstead 'tee'. It is a project that sits as part of the 'Great Grid Upgrade' which is NGET's flagship programme to modernise and expand the UK electricity transmission network. It involves building new infrastructure and upgrading existing assets to connect renewable energy sources, improve resilience and support the UK's net-zero targets. BTNO is designed to alleviate constraints between Bramford and Pelham that will materialise with the increase in power from East Anglia. The extra power from Bramford will need to be further distributed South and West. Without the Project, the network capacity constraint will shift from Bramford – Twinstead to Twinstead – Pelham; and Twinstead – Rayleigh.
- 3.2.3 The Project also has interfaces with the following:
- (a) Hackney Waltham Cross Upgrade (**HWUP**): a major electricity transmission reinforcement scheme in North London, forming part of the UK's Accelerated

Strategic Transmission Investment (**ASTI**) programme. HWUP is designed to increase transmission capacity and support the UK's transition to clean energy by enabling more renewable generation to flow into the grid. That project is scheduled for completion in 2027-2028. HWUP will include uprating existing overhead lines from 275kV to 400kV to double capacity and meeting growing demand, replacing ageing substation technology, reconductoring across multiple routes and providing a new gas-insulated substation.

- (b) Bulls Lodge expansion: a key infrastructure project near Boreham, Essex, forming part of the UK's wider grid reinforcement strategy to meet growing electricity demand and supporting renewable energy integration whilst enabling the transition to low-carbon energy. The purpose of that project is to expand the existing substation to accommodate additional circuits, facilitate the connection of large-scale renewable generation and improve reliability of the transmission network in the East of England. This project will enable the connection of major renewable projects such as Longfield Solar Farm.
- (c) Although not directly linked, the Project also has interfaces with the Norwich to Tilbury Development Consent Order application which is currently at examination stage with PINS.

4. NEED

4.1 Introduction

- 4.1.1 NGET owns and maintains the high-voltage electricity transmission network in England and Wales and is required under section 9 of the 1989 Act to develop and maintain an efficient, co-ordinated and economical system of electricity distribution. The network carries electricity from the generators to substations, where the voltage is lowered ready for distribution to homes and businesses. It is NGET's statutory duty to ensure that there is sufficient electricity transmission infrastructure available to support future energy demand in England and Wales.
- 4.1.2 In accordance with Schedule 9 of the 1989 Act, NGET must also have regard to the desirability of preserving natural beauty, conserving flora, fauna and geological or physiographical features of special interest and protecting sites, buildings and objects of architectural, historic or archaeological interest.
- 4.1.3 The following sub-paragraphs in this Section 4 set out the framework within which the Project exists, and the need for the Project.
- 4.1.4 East Anglia's 400 kV electricity transmission network, including the overhead lines and underground cables which transports electricity around the country, was largely built in the 1960s. It was built to supply regional demand, centred around Norwich and Ipswich; it was not designed to facilitate the transmission of electricity generated in mainland Europe and exported to the UK through interconnectors. With the growth in new energy generation from offshore wind, nuclear power and interconnections from overseas, there will be much more electricity being generated in East Anglia or transmitted to East Anglia from overseas than the network can currently accommodate. The existing network needs upgrading to be able to transport cleaner, greener energy from where it is generated to where it is consumed. The reconductoring works form part of the ongoing maintenance and enhancement of electricity transmission infrastructure within this strategic context.

4.2 Need for and benefits of the Project

- 4.2.1 The huge growth in offshore wind, interconnectors and nuclear power means that more electricity will be generated in the years ahead than the current network is able to transport securely and reliably. One of the drivers behind the Project is that new power lines are needed across the transmission network to meet the Government target of

connecting 43-50 GW of offshore wind by 2030 and 45-47 GW solar power by 2035 (Clean Power Action Plan), enough to power every home in the country with clean, green and more affordable energy.

4.2.2 NGET has identified a need to enable a 6,377MW boundary uplift in the East Anglia region. BTNO will provide 3,650MW, and the Project enables a further 1,426MW. This will allow for transmission of power from increased North Sea offshore wind assets and the recently consented Sizewell C Nuclear Power Station (**Sizewell**). Without the Project, the full advantages of BTNO cannot be realised. It is a key part of NGET's regional strategy to increase electricity supply throughout the region from the North Sea to local and national consumers. The Project will allow NGET to meet future demand and integrate offshore wind without major tower replacements.

4.2.3 The section to be upgraded by the Project is shown in Figure 2 below coloured red.



Figure 2: Key OHL sections to be upgraded by the Project and associated substations in red.

4.2.4 Based on Figure 2 above, BTNO will be built to enable power from offshore wind capacity and Sizewell to be transmitted from Bramford to Twinstead Tee. At this point, in the current configuration (Quad Zebra), the sections from Twinstead, west to Pelham, and from Twinstead south to Braintree and Rayleigh will become congested and form capacity constraints on exporting this power to the wider network. The Project is designed to increase transfer capability in these sections and alleviate the network constraint. After the upgrades have been completed following delivery of both BTNO and the Project, the transmission capacity in the region will significantly increase, improving network resilience and enabling continued connection of renewable generation assets.

4.2.5 The Project will act as a key element of the network reinforcement to realise the benefits from other local schemes, that include reconductoring and connecting renewable energy generation. The Project is a prerequisite if the benefits of BTNO are to be fully realised, which is part of the Great Grid Upgrade and the ASTI framework. The ASTI framework is a regulatory mechanism introduced by Ofgem to fast-track critical transmission projects. It provides early funding and streamlined approvals for projects that are essential to deliver the government's 2030 decarbonisation goals and integrate large volumes of offshore wind and other renewables into the grid.

- 4.2.6 There are also asset health considerations. The existing conductors themselves are of varying age with different remaining asset lifetimes along the route, some of them have been in place upwards of 50 years and would likely require replacement in the near future, even without the Project. The current conductors are part of an ageing asset family and steelwork condition. Strengthening will be addressed as part of this Project. The new conductors will be strung to existing towers. At least 7 require upgraded foundations and 180 need the muffs repaired/replaced.
- 4.2.7 The swap also ensures the asset remains fit for purpose over its life with proportionate land interference. By re-using the existing towers and alignment, the upgrade avoids new land-take, keeps access requirements to short, defined construction windows, and reduced future maintenance frequency and intrusive works. This minimises environmental effects and disturbance for landowners compared with constructing new supports or a new route, while delivering long-term efficiency and whole-life cost savings by lowering the total cost of designing, building, operating and maintaining the electricity transmission network over its entire lifespan.

4.3 Policy support for the Project

The need for the Project is reflected in the strong policy support for the Project set out below:

4.3.1 National Energy Policy

- (a) The UK Government has set ambitious targets to achieve net zero in their greenhouse gas emissions by 2050 in England and Wales. To meet these targets, the UK will need to continue to move away from traditional and polluting forms of energy generation to heat homes, charge vehicles and power businesses, and there will be a greater need for cleaner, greener energy.
- (b) In November 2020, the UK Government set out its Ten Point Plan for a Green Industrial Revolution (the **Ten Point Plan**). The Ten Point Plan lays the foundations for the UK to meet its legal obligation to deliver Net Zero greenhouse gas emissions by 2050. The Ten Point Plan recognises that in order to connect green energy generation, specifically offshore wind, the UK must undertake a significant transformation and reinforcement of its existing electricity transmission network.
- (c) The Energy White Paper published in December 2020 (the **White Paper**) sets out how the UK will reach net zero emissions by 2050.
- (d) The White Paper explains that it is likely that overall demand for electricity will double by 2050 due to the electrification of other sectors such as transport and heating. On page 42, it states that meeting this demand by 2050 would require “a four-fold increase in clean electricity generation with the decarbonisation of electricity increasingly underpinning the delivery of our net zero target”.
- (e) The White Paper identifies the Government’s aim for a fully decarbonised, reliable and low-cost power system by 2050, including the (then) target of 40 GW of wind generation capacity by 2030, which is enough to power every home in the UK. At page 76, the White Paper explains the importance of electricity network infrastructure in enabling the successful delivery of this objective. It states:

“The transformation of our energy system will require growing investment in physical infrastructure, to extend or reinforce the networks of pipes and wires which connect energy assets to the system and maintain essential resilience and reliability.”
- (f) The UK Government's British Energy Security Strategy (April 2022) (the **BESS**) now identifies a target of delivering 50 GW of renewable wind energy by 2030. The BESS sets out the Government's aims to reduce reliance on coal and gas

and to generate and store more renewable and nuclear energy in the UK and recognises the importance of the transmission network within this strategy, noting that accelerating our domestic supply of clean and affordable electricity also requires the expansion and growth of that transmission network to connect new green energy generation, and to transfer the power to where it is needed most.

- (g) Building on the BESS and the Net Zero Plan the previous Government published the following plans:
 - (i) 'Powering Up Britain' Energy Security Plan (Updated 4 April 2023) (the Energy Security Plan);
 - (ii) 'Powering Up Britain' The Net Zero Growth Plan (Updated 4 April 2023) (the Net Zero Growth Plan); and
 - (iii) 'Clean Power 2030 Action Plan (Updated 15 April 2025) (a new era of clean electricity).'
- (h) The Net Zero Strategy: Build Back Greener, 2021 (the Net Zero Strategy) sets out the Government's vision of using the necessary action to tackle climate change as an economic opportunity to create prosperity. Part 3i (Power) sets out the key commitments to deliver a decarbonised power system by 2035. These include:
 - (i) Subject to supply, all electricity will come from low carbon sources by 2035;
 - (ii) Delivery of 40GW of offshore wind by 2030;
 - (iii) Investing in supply chains, infrastructure and early-coordination of offshore transmission networks for the offshore wind sector; and
 - (iv) Ensuring the planning system can support the deployment of low carbon energy infrastructure.
- (i) The Energy Security Plan sets out the steps that the Government is taking to ensure that the UK is "more energy independent, secure and resilient". It builds on the Government's ambitions set out in the BESS and the Net Zero Strategy, setting out an aim to double Britain's electricity generation capacity by the late 2030s so as to move towards energy independence, whilst acknowledging that demand for electricity could itself double by 2050. In this regard, the Energy Security Plan notes that the "right" electricity network infrastructure and network connection is critical for building new energy infrastructure, with *"over 250 gigawatts of generation in the transmission connection queue (compared to circa 80 gigawatts that is currently connected)"*. The following priorities are identified to speed up the delivery of such infrastructure:
 - (i) Halving development time for transmission network projects;
 - (ii) Taking a whole system approach to network planning;
 - (iii) Enabling an effective legislative and regulatory framework;
 - (iv) Accelerating electricity network connections; and
 - (v) Expanding and optimising electricity interconnection with neighbours.
- (j) The Energy Security Plan is complemented by the Net Zero Growth Plan, which notes that energy security and net zero are "two sides of the same coin".
- (k) As well as building on the above documents, the Net Zero Growth Plan is part of the Government's response to the recommendations of 'Mission Zero', the report

of the Independent Review of Net Zero published in January 2023. This report identifies infrastructure's key role in the delivery of net zero, noting that scale and speed are required, and recognising the need for the electricity network to keep pace with the Government's renewable energy ambition. The Net Zero Growth Plan confirms that the Government is *"partly or fully acting upon 23 recommendations from the Independent Review of Net Zero report's 25 recommendations for 2025."* It also sets out progress on delivery in various areas, including the Government's ambition to halve the time it takes to build new transmission network infrastructure.

- (l) In "Future Energy Scenarios 2024" (updated version published in November 2025), the National Energy System Operator (**NESO**) sets out future energy scenarios, which are a recognised suite of documents which indicate whether particular future pathways for electricity generation can be successful in line with current national policy targets. NESO specifies that strategic and timely investment across the whole energy system is critical to achieving decarbonisation targets and minimising network constraints. Grid connection availability is noted to be a barrier to reaching these targets.
- (m) In December 2024, the Clean Power 2030 Action Plan (**Action Plan**) was published which aims to achieve a clean electricity system by 2030, with at least 95% of electricity generation coming from low carbon sources and clean sources producing at least as much power as the UK consumes. The Action Plan makes clear that NGET's grid infrastructure needs strengthening, and that Great Britain's electricity network must undergo unprecedented expansion, as the economy electrifies, to deliver decarbonisation, energy affordability, energy security, and support economic growth.
- (n) In June 2025, the Department for Business and Trade published the UK's Modern Industrial Strategy. This provides a ten-year roadmap to unlock £25.6 billion in British Business Bank Funding. It identifies eight high growth sectors including clean energy. The UK's Modern Industrial Strategy also identifies that high electricity prices and grid connection delays are a barrier to electrification in the UK's energy-intensive industries and to the delivery of net zero commitments.
- (o) The above national drivers highlight the importance of transforming the energy generation and electricity network of the UK to renewables so that the country can meet its legal target of net zero greenhouse gas emissions by 2050.

4.3.2 Energy NPS

- (a) The UK Government recognises the importance and urgency of new energy developments and has published a series of National Policy Statements (**NPS**) which set out national policy for nationally significant energy infrastructure recognising that providing affordable, reliable and sustainable energy is a key issue in UK Government policy. Although applying strictly to those projects falling within the definition of Nationally Significant Infrastructure Projects (**NSIPs**), the NPSs may also be a material consideration for projects progressed under the Town and Country Planning Act 1990 (as amended) or where no development is taking place. The Project is for a scheme promoted using planning powers under the Town and Country Planning Act 1990 (as amended) albeit the Project is using permitted development powers where there is no development.
- (b) The NPS for Energy (NPS EN-1, December 2025), and the NPS for Electricity Networks Infrastructure (NPS EN-5), December 2025) are considered to be material considerations and demonstrate national policy support for the Project:
 - (i) The overarching NPS for Energy (NPS EN-1) (updated December 2025) sets out the Government's policy for delivery of major energy infrastructure. NPS EN-1 sets out the concept of critical national priority (**CNP**)

infrastructure (paragraph 4.2) which includes low-carbon infrastructure defined as (amongst other things) all power lines within the scope of EN-5 (the electricity networks NPS) including network reinforcement, upgrade works and associated infrastructure for electricity grid infrastructure. This extended scope recognises the heightened need for infrastructure to meet national security and net-zero aims through clean energy generation and the means of transmitting it across the UK.

- (ii) The weight to be attached to CNP infrastructure is significant. The need case of CNP will outweigh residual effects in “all but the most exceptional cases” (paragraph 4.2.28).
- (iii) Paragraph 2.1.2 recognises that: *“To produce the energy required for the UK and ensure it can be transported to where it is needed, a significant amount of infrastructure is needed at both local and national scale. High quality infrastructure is crucial for economic growth, boosting productivity and competitiveness.”*
- (iv) Paragraph 2.4.1 notes that given the vital role of energy to economic prosperity and social well-being, it is important that our supplies of energy remain secure, reliable and affordable and paragraph 3.3.3 sets out the need for new nationally significant electricity infrastructure, stating that: *“To ensure that there is sufficient electricity to meet demand, new electricity infrastructure will have to be built to replace output from retiring plants and to ensure we can meet increased demand. Our analysis suggests that even with major improvements in overall energy efficiency, and increased flexibility in the energy system, demand for electricity is likely to increase significantly over the coming years and could more than double by 2050 as large parts of transport, heating and industry decarbonise by switching from fossil fuels to low carbon electricity. The Impact Assessment for CB6 shows an illustrative range of 465-515TWh in 2035 and 610-800TWh in 2050.”*
- (v) Paragraph 3.3.67 states that existing transmission infrastructure must adapt and evolve to cope with the reality that in the transition to net zero, the electricity system will grow in scale, dispersion, variety and complexity. This means that work is needed to protect against the risk of large-scale supply interruptions.
- (vi) Paragraph 3.3.80 recognises that the case for network reinforcement is demonstrated if the proposed development represents an efficient and economical means of:
 - (A) reinforcing the network to accommodate such connections; or
 - (B) reinforcing the network to ensure that it is sufficiently resilient and capacious (per any performance standards set by Ofgem) to reliably supply present and/or anticipated future levels of demand.
- (vii) Paragraph 3.3.21 acknowledges that a diverse mix of electricity infrastructure is needed to come forward to deliver a secure, reliable, affordable and net zero consistent system during the transition to 2050.
- (viii) A specific section on the need for new electricity networks is set out at paragraphs 3.3.65-3.3.83. This section provides that new electricity infrastructure projects will add to the reliability of the national energy supply and provide crucial national benefits which are shared by all users of the system. Such infrastructure is required not only for connecting to new generation sources and demand but also to ensure system resilience against supply interruptions, involving upgrades to existing networks and

reinforcement works to accommodate increased power flows to regional demand centres.

- (c) EN-5 (updated December 2025) is the NPS for electricity networks infrastructure and was developed to provide policy direction on the development of new electricity networks. NPS EN-5 reinforces the need for a coordinated approach in relation to off-shore-onshore electricity transmission (see paragraph 2.12).
 - (i) In addition, paragraph 2.15.1 states that *“coordinated approaches to delivering offshore and onshore transmission to minimise overall environmental, community and other impacts, as set out above, must be considered.”*
 - (ii) Paragraph 1.1.1 of EN-5 states that *“The security and reliability of the UK’s current and future energy supply is highly dependent on having an electricity network which will enable the new electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to Clean Power by 2030 and net zero, while maintaining energy security.”*
 - (iii) Paragraph 1.1.3 states: *“The electricity network infrastructure to support the government’s ambition to meet out Clean Power 2030 mission is as important as the generation infrastructure. Without the development of the necessary networks to carry low carbon power to where it is needed in the UK, the Clean Power 2030 Mission cannot be achieved.”*
 - (iv) EN-5 supports NGET’s strategy to reduce its SF6 (Sulfur hexafluoride) emissions, with paragraph 2.9.61 stating that SF6 is *“an extraordinarily potent greenhouse gas, and fugitive emissions from electricity networks infrastructure are an object of increasing environmental concern, especially in light of the UK’s commitment to net zero by 2050.”* In light of this, paragraph 2.9.62 advises *“Applicants should at the design phase of the process consider carefully whether the proposed development could be reconceived to avoid the use of SF6-reliant assets.”*
 - (v) EN-5 supports NGET’s preference to secure permanent rights and upgrade wayleaves to easements, with paragraph 2.6.4 stating that *“In such cases (i.e. where the compulsory acquisition of rights is sought) permanent arrangements are strongly preferred over voluntary wayleaves (which could, for example, be terminable on notice by the landowner) in virtue of their greater reliability and economic efficiency and reflecting the importance of the relevant infrastructure to the government’s Clean Power and net zero goals.”*

4.3.3 NPPF

- (a) The National Planning Policy Framework (the **NPPF**, 12 December 2024) is also material to, and demonstrates national policy support for, the Project. In particular, the NPPF sets out a presumption in favour of sustainable development. In this context it emphasises three overarching objectives:
 - (i) An economic objective - to help build a strong, responsive and competitive economy, including by identifying and coordinating the provision of infrastructure;
 - (ii) A social objective - to support strong, vibrant and healthy communities; and
 - (iii) An environmental objective - to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and

pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- (b) The Project is essential energy infrastructure which will assist in the delivery of a low carbon economy and therefore accords with each of these three objectives.
- (c) Section 14 of the NPPF (Meeting the challenge of climate change, flooding and coastal change') (February 2025) also sets out a number of core planning principles that should underpin decision making. In particular paragraph 161 reads:

"The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."

- (d) The Draft NPPF consultation (December 2025) contains new development plan and decision-making policies for energy including electricity network infrastructure. The most relevant policy is W3 which states:

W3: Renewable and low carbon energy development and electricity network infrastructure

In considering proposals for renewable and low-carbon energy development and electricity network infrastructure, substantial weight should be given to:

The benefits of such development for improving energy security, supporting economic development and moving to a net zero future;

In the case of applications for the re-powering and life-extension of existing sites, the additional benefit of utilising an established site for this purpose; and

The contribution that small-scale and community-led renewable and low carbon energy projects can make to reducing emissions, along with their associated economic and social benefits.

Applicants should not be required to demonstrate the need for renewable or low carbon energy development and electricity network infrastructure. Where proposals for this form of development come forward outside areas which have been identified as suitable for them they should be acceptable when assessed against the national decision-making policies in this Framework, taken as a whole.

Where development is expected to be time-limited, applications should be accompanied by proposals for decommissioning and site restoration, including details of how these measures are expected to be implemented.

4.3.4 Local Policy

- (a) The Project passes through the administrative areas of Uttlesford District Council, Braintree District Council, Chelmsford City Council, Basildon Borough Council and Rochford District Council. Essex County Council is also relevant as the minerals and waste planning authority and as a strategic authority for infrastructure, transport and cross-boundary planning. Together, the adopted and emerging development plan documents of these authorities provide the local policy context.

- (b) As the Project comprises the reconductoring of an existing overhead electricity transmission line and constitutes permitted development under the Town and Country Planning (General Permitted Development) (England) Order 2015, this section does not assess development management compliance. Instead, it considers the extent to which the Project relates to, and sits within, the strategic objectives and policy themes of the relevant development plans, and whether any policy conflict arises that would weigh against the justification for compulsory acquisition.

(i) Uttlesford District Council:

The adopted development plan for Uttlesford is the Uttlesford Local Plan (adopted March 2026). Policy GEN6 (Infrastructure Provision to Support Development) states that development will not be permitted unless provision is made for community facilities, school capacity, public services, transport provision, drainage and other infrastructure made necessary by the proposed development. The policy also confirms that, where cumulative impacts necessitate additional provision, developers may be required to contribute to the cost of such infrastructure.

While Policy GEN6 is directed at ensuring that new development is supported by necessary infrastructure, it also reflects a broader principle that essential services and infrastructure should be maintained and capable of meeting the needs of communities. In this context, the Project involves works to existing electricity transmission infrastructure, which relates to the policy's emphasis on the ongoing provision of essential services.

Policy GEN2 (Design) sets out criteria for development including compatibility with surrounding scale and character, the safeguarding of important environmental features, the efficient use of water and energy, and the avoidance of unreasonable effects on nearby occupants.

The reconductoring works are confined to the existing overhead line corridor and do not introduce new built form or permanent land use change. The considerations set out in Policy GEN2 therefore provide relevant context when considering how such works sit within the established policy framework.

The Uttlesford Local Plan 2021–2041 was adopted in March 2026 and now forms part of the development plan for the District.

Core Policy 5 (Providing Supporting Infrastructure and Services) requires development to provide the infrastructure necessary to support growth and highlights the importance of ensuring the timely delivery of infrastructure through coordination with the Infrastructure Delivery Plan and other relevant development plan policies. The policy reflects the wider principle that essential infrastructure should be maintained and delivered in a manner that supports communities and sustainable development.

In this context, the Project involves works to existing electricity transmission infrastructure and relates to the ongoing provision and resilience of essential infrastructure serving the District and the wider region.

Core Policy 1 (Addressing Climate Change) establishes the Council's overarching approach to climate change mitigation and adaptation. The policy seeks to support measures that reduce greenhouse gas emissions and specifically refers to accelerating the expansion of renewable and low carbon energy generation within the District.

The supporting framework of the Local Plan therefore recognises the importance of energy infrastructure in facilitating the transition to a lower-carbon future and supporting wider climate change objectives.

Core Policy 25 (Renewable Energy Infrastructure) states that the Council supports proposals for renewable and low carbon energy generation and distribution networks. The policy recognises the role of energy infrastructure in facilitating renewable and low carbon energy deployment, whilst ensuring that environmental and amenity considerations are appropriately addressed.

Whilst the Project is not itself a renewable energy generating project, it relates to the transmission network through which renewable and low carbon energy can be distributed. The policy therefore provides relevant context in understanding the role of strategic electricity infrastructure within the District.

(ii) Braintree District Council

The adopted development plan for the district is the Braintree District Local Plan 2033 (Section 1 and Section 2).

Strategic Policy SP6 (Infrastructure and Connectivity) establishes that development should be supported by the provision of infrastructure, services and facilities necessary to serve the needs arising from development. The policy sets out a coordinated approach to infrastructure planning across North Essex, including transport, utilities, and digital connectivity.

In this context, the Project relates to the continued operation and resilience of the electricity transmission network serving Braintree District and the wider region, which forms part of the infrastructure framework addressed by the Local Plan.

Policy LPP78 (Infrastructure Delivery and Impact Mitigation) provides that planning permission will be granted where there is sufficient appropriate infrastructure capacity, or where such capacity will be delivered, and highlights the importance of coordination between developers, local authorities and infrastructure providers in managing cumulative effects over time.

While the Project does not require planning permission, the policy illustrates the Local Plan's strategic emphasis on ensuring that essential infrastructure remains viable, sustainable and fit for purpose. The reconductoring works form part of the ongoing maintenance and enhancement of electricity transmission infrastructure within this strategic context.

(iii) Chelmsford City Council

The development plan for Chelmsford City is the Chelmsford Local Plan 2013–2036, adopted in May 2020.

Strategic Policy S2 (Addressing Climate Change and Flood Risk) sets out the Council's approach to mitigating and adapting to climate change, including encouraging measures that reduce greenhouse gas emissions and facilitate renewable and low-carbon energy generation.

Strategic Policy S9 (Infrastructure Requirements) establishes the overarching expectation that development should be supported by the provision of infrastructure, services and facilities necessary to meet identified

needs. The policy specifically refers to utilities infrastructure, including electricity and gas distribution and supply, as well as opportunities for renewable and low-carbon energy.

Strategic Policy S10 (Securing Infrastructure and Impact Mitigation) addresses the timely delivery and coordination of infrastructure and highlights the role of working with infrastructure providers to ensure that capacity is available and maintained over time.

Taken together, these strategic policies illustrate Chelmsford's Local Plan's recognition of the importance of resilient and coordinated energy infrastructure in supporting existing communities and wider strategic objectives.

(iv) Basildon Borough Council

Basildon Borough Council's adopted planning framework comprises the Basildon District Local Plan saved policies (2007). An emerging Local Plan is in preparation but is not yet adopted.

Policy BAS BE12 relates to the design and impact of residential development and sets out considerations including the protection of residential amenity, the character of the surrounding area, and the management of noise, disturbance and traffic effects. The supporting text explains that development should not unduly affect neighbouring residents or the visual environment.

Although Policy BAS BE12 is directed primarily at residential development, it reflects the Council's broader approach to managing the impacts of development on communities and local amenity and provides relevant context within the borough's adopted planning framework.

(v) Rochford District Council

The development plan for Rochford District comprises the adopted Core Strategy (Adopted 2011) and Development Management Plan (Adopted 2014), with a single emerging Local Plan currently in preparation.

Policy DM1 (Design of New Development) requires development to positively contribute to the surrounding natural and built environment and to take account of impacts on landscape, heritage and biodiversity assets.

The reconductoring works are confined to the existing overhead line corridor and do not involve new land take or new built form. The policy framework therefore provides relevant context for understanding the relationship between infrastructure works and the protection of environmental and amenity considerations.

Rochford's Core Strategy also includes policies relating to renewable and low-carbon energy infrastructure, including Policy ENV6 (Large-Scale Renewable Energy Projects) and Policy ENV7 (Small-Scale Renewable Energy Projects), which indicate support for such infrastructure where impacts are appropriately addressed. While the Project is not itself a renewable energy project, it relates to the transmission of renewable and low-carbon energy by reinforcing existing electricity infrastructure within the district.

(vi) Essex County Council

The strategic development plan also includes the Essex Minerals Local Plan 2014 and the Essex and Southend-on-Sea Waste Local Plan 2017, prepared by Essex County Council in its role as minerals and waste planning authority. These plans form part of the statutory development plan and provide a county-wide framework for infrastructure-related planning matters.

In addition, Essex County Council acts as a strategic consultee and highways authority, with a role in the coordination of infrastructure, transport and cross-boundary planning across Essex. This role provides additional policy context for the delivery and ongoing operation of regionally significant infrastructure.

- (c) In summary, the urgent need for renewable energy infrastructure and an improved electricity transmission network to address the causes of climate change is acknowledged at both local and national level.

4.3.5 Other matters

- (a) Under section 9 of the 1989 Act NGET has a general duty to develop and maintain an efficient, co-ordinated and economical electricity transmission network.
- (b) The following NGET policies are relevant:
 - (i) NGET's Environmental Sustainability Policy: NGET is committed to operating its business in an environmentally responsible way and ensuring that sustainability shapes its thinking and decision-making; and
 - (ii) NGET's Stakeholder, Community and Amenity Policy: This policy includes 10 commitments linked to NGET's environmental obligations under the 1989 Act. Of particular relevance to the Project are Commitments 1 (Establishing Need), 3 (seeking to avoid areas which are nationally or internally designated for their landscape, wildlife or cultural significance), 4 (minimising the effects of works and new infrastructure on communities), 5 (mitigating the adverse effects of works through the application of best practice environmental assessment techniques) and 7 (enhancing the environment).

4.4 Summary of the benefits of the Project

The key benefits that will arise from the Project, which are in line with the aforementioned duties, policies and guidance, are:

- (a) Meeting energy demand and customer connection requirements;
- (b) Providing critical network reinforcement;
- (c) Transitioning to net zero/low carbon economy; and
- (d) Energy security/reliability of supply.

5. RIGHTS REQUIRED AND NEGOTIATIONS

- 5.1 The Schedule to the Order identifies those persons with an interest in the Order Land. NGET has attempted to engage constructively in meaningful discussions with all known owners and occupiers of the Order Land, with a view to acquiring the new rights needed for the Project by agreement if at all possible, in accordance with the Guidance.
- 5.2 Stakeholders such as local residents, landowners, DNOs, renewable energy producers all have a keen interest in the Project and proactive management of all stakeholders is a key pillar of NGET's strategy for major projects including this one.

- 5.3 Negotiations to acquire the new rights needed for the Project are being carried out by Savills, acting on behalf of, and instructed by, NGET.
- 5.4 The stakeholders and third-party interface points considered for the proposed route have been categorised by NGET into two major groups: external interfaces and internal interfaces:
- 5.4.1 External interfaces – are any individual or groups that are outside the Project delivery team who are affected by the proposed scope of works in some way;
- 5.4.2 Internal interfaces - are any individual or groups that are within the Project delivery team or people who work directly within the businesses engaged.
- 5.5 In addition to being classified as internal and external, the interfaces associated with the project should be identified as one of the following types:
- 5.5.1 Operational / organisational interfaces (O) – involves different organisations carrying out operational activities in series with others that are dependent on each other, or simultaneous operational activities that impact each other. Examples would be Network Rail & UK Power Networks (DNO)..
- 5.5.2 Access interfaces (A) - involves accessing 3rd parties / Grantors land to carry out the works.
- 5.5.3 Technical interfaces (T) - are interfaces that occur within the network operation such as tie-in points with OHL & Sub-station equipment.
- 5.5.4 Soft interfaces (S) - involves the exchange of data and information such as design criteria, OHL clearance requirements or utility / road crossings between the Project Delivery Team and an external party.
- 5.6 The stakeholders, both internal and external along the whole length of the route have been identified and ranked in terms of their ability to influence the Project outcome and their likely level of interest in the Project. The rights NGET are seeking have been tailored to be proportionate and reasonable for the type of interface. Project stakeholders have all been engaged and briefed on the scope of the works and associated timelines. Land Referencing for the Project commenced on 21 July 2025. Engagement with the majority of owners and occupiers commenced on 1 September 2025.

5.7 Acquisition of Rights

No freehold land is to be acquired for this Project. The rights to be purchased compulsorily over the land under the Order (in the absence of voluntary agreement) are described in Table 1 of the Order Schedule and are summarised and replicated below. The land over which the rights are to be acquired compulsorily is shown coloured blue on the Order Map. Only those rights required for acquisition have been included within the Order limits. The rights to be acquired facilitate the works on both sides of the towers even though this Project's focus is uprating the conductors along one side of the existing towers. The plans accompanying the Order have therefore been prepared to exclude any areas not necessary for the purposes of the Project.

Name of Rights Package	Rights
Overhead Line Rights	All rights necessary at all times for the purposes of or incidental to the construction, retention, use, operation, protection, maintenance, surveying, testing, repair, renewal, replacement, commissioning and removal and decommissioning of the overhead electricity lines and associated infrastructure, including rights to:

Name of Rights Package	Rights
	(a) enter, oversail and remain on the land and adjoining land with or without personnel, vehicles, plant, machinery, apparatus and equipment including scaffolding, materials and personnel for such purposes; (b) take all necessary rights of support for the electricity lines; (c) install and remove protection measures for third party structures/assets, including scaffolding; (d) install, retain, replace and remove safety devices upon electricity lines located on the land; (e) carry out works required or permitted by a planning permission and/or consent or licences; (f) erect and remove fencing; (g) store and stockpile and where necessary use, manage and process plant, machinery, apparatus, and materials (including excavated material) and/or equipment; (h) construct, lay down, use and remove access roads including any necessary temporary bridging, culverting or diversion of water courses and drains and modifying road verges and junctions; (i) carry out de-watering and drainage works and install, alter, reinstate or remove land drainage systems; (j) discharge water into existing drains and watercourses; (k) protect and prevent damage to or interference with the operation and maintenance of the electricity lines and construction of the same; (l) fell, trim or lop trees, shrubs, hedges and bushes and to clear and remove any and all vegetation which may damage, obstruct or interfere with these Overhead Line Rights or access to the electricity lines; (m) the right to bring onto the land, position and swing the jib of a crane loaded or unloaded through the airspace above the land for the purposes of constructing, installing and removing machinery and equipment; (n) fly a small uncrewed aircraft over the land for the purpose of carrying out inspections of the electricity lines which are at ground level or above and to acquire data in respect of the land during the flight provided that the Acquiring Authority is to act in compliance with Civil Aviation Authority guidance as may be in place for such use from time to time; (o) enter any part of the land to retrieve and recover any small, uncrewed aircraft; (p) prevent and remove any works on or use of the land that would prevent the works, access to or the operation and maintenance of the electricity lines; (q) erect, create, use and remove hoarding, welfare facilities including portable toilets, portable cabins and

Name of Rights Package	Rights
	offices, security cameras, parking of vehicles and electricity generators; (r) install, use and remove artificial lighting; (s) install, use, alter, divert and remove services and utilities; (t) prevent changes to the use, or level of the surface of, the land; (u) make good any damage caused in connection with the exercise of these Overhead Line Rights; and (v) carry out any activities ancillary or incidental thereto.
Construction Compound Rights	All rights necessary for the purposes of or incidental to the establishment, use and removal of works compounds associated with the construction, commissioning and decommissioning of the electricity lines, including to: (a) erect, create, use and remove a works compound which may include hardstanding, portable cabins and offices, security measures and welfare facilities including portable toilets and electricity generators; (b) store, stockpile and where necessary use, manage and process plant, machinery, apparatus, materials (including excavated material) and/or equipment; (c) access and remain on the compound area with or without vehicles, personnel and plant, machinery, apparatus, equipment and materials for such purposes; (d) fence, erect hoardings or signage or otherwise secure the compound; (e) carry out de-watering and drainage works and install, alter or reinstate land, drainage systems; (f) discharge water into existing drains and watercourses; (g) install, use and remove artificial lighting; (h) park vehicles; (i) protect and prevent damage to or interference with the exercise of the Construction Compound Rights including the operation and maintenance of any works constructed pursuant to these Construction Compound Rights; (j) fell, trim or lop trees, shrubs, hedges and bushes and to clear and remove any and all vegetation which may damage, obstruct or interfere with the exercise of these Construction Compound Rights; (k) install, use, alter, divert and remove services and utilities; (l) the right to erect repair reinstate and remove temporary scaffolding; (m) carry out archaeological environmental and/or ecological mitigation measures; (n) make good any damage caused in connection with the exercise of these Construction Compound Rights; and

Name of Rights Package	Rights
	(o) carry out any activities ancillary or incidental thereto.
Construction and Operational Access Rights	All rights necessary to access the land at all times with or without vehicles, plant, machinery, apparatus, equipment (including without limitation scaffolding), materials and personnel, to exercise the Overhead Line Rights, Construction Compound Rights and Earthing Rights, including to: (a) access the land and adjoining Order land for the purposes of or incidental to the preparation, construction, installation and commissioning of the overhead electricity lines and associated infrastructure, decommissioning or removal of existing overhead electricity lines and associated infrastructure, electrical plant, structures and apparatus from that land and for the purposes of operating, inspecting, maintaining, repairing, altering, renewing, replacing, removing or decommissioning the overhead electricity lines; (b) carry out works to facilitate such access including to construct, lay down, use and remove access roads including any necessary temporary lighting, temporary welfare structures, generators, temporary traffic signage and associated traffic management, temporary bridging, erecting fencing and gates, carrying out security operations, carrying out earth works, removing structures or apparatus, modifying road verges, junctions and bellmouths and installing, using, altering, diverting, and removing services and utilities; (c) with or without vehicles plant and equipment to fell, trim or lop all trees, bushes and vegetation and remove or alter walls, fences or any other structures or erections on the land which obstruct or interfere with the exercise of the rights granted; (d) the right to bring onto the land, position and swing the jib of a crane loaded or unloaded through the airspace above the land for the purposes of constructing, installing and removing machinery and equipment; (e) with or without vehicles plant and equipment to enter the land to access any adjoining land in connection with the Acquiring Authority's undertaking; and (f) carry out any activities ancillary or incidental thereto.

5.8 Progress

5.8.1 As indicated above, NGET has been seeking to secure all necessary rights by agreement and as at the date of this Statement, the following progress has been made:

- (a) In September 2025 NGET referenced a 100m corridor as there was no final Red Line Boundary. NGET deliberately selected a wider corridor to ensure that all landowner information could be captured.
- (b) A total of 869 Land Information Questionnaires (LIQs) were sent between 3rd September 2025 and 15th December 2025. There were also 548 follow up LIQs

issued on the 1st of October 2025 to those who had not responded. The LIQs that were issued after then were for unregistered landowners or additional parties made aware to NGET from the LIQ process.

- (c) 363 LIQs were returned and processed and 8 contacted NGET to decline to return the relevant LIQ.
- (d) As a result of the information provided from the LIQs NGET contacted 359 persons interested in the land to provide them information on the Project and request an in-person meeting to discuss both the Project and NGET's land rights requirements.
- (e) 134 meetings were held between 30th September 2025 and the 13th of January 2026. When meeting landowners NGET provided them with an engagement survey which included the question "Landowners willingness to enter into voluntary easement agreement" with the options of "Willing to negotiate", "Not willing – will wait for NGET to use statutory powers", "No - do not want to engage at all".
- (f) NGET issued 318 offer letters on 15th January 2026 to all identified impacted parties.
- (g) Since the CPO was submitted on 21 May. There have been a further 2,492 with identified parties, including 14 more offer letters where the those with an interest in unregistered land have been identified.
- (h) This engagement has led to a further 11 offer letters being signed, and notably, there has been only one refusal.
- (i) 26 meetings have been held with landowners and 26 phone calls.

5.8.2 Progress

- (a) Updates in relation to negotiations are set out in the table below (please note that a number of the offer letters issued are now redundant, as rights were no longer required across certain titles and removed as the Project progressed).

Totals – as at	Statement of Reasons	Statement of Case
Volume of PIL interactions (email & tel. - excl. surveys)	1,152	3,644
Offers instructed to Legal	0	19
Offer letters sent	333	347
Offer letter grantor responses (incoming calls/emails)	230	256
Offer letters signed	38	49

- (b) Please also see an updated engagement log at Appendix A to this Statement.

- (c) In addition to individual engagement, NGET organised two drop-in engagement events, one based in Wickford and one in Braintree. Most attendees visited after receiving a mailshot invitation, seeking information about the Project, and those who attended left feeling better informed. In Wickford, queries focused on the impact of works on Royal Oak Drive, programme duration, land ownership near the garages, and the rationale for the CPO process. In Braintree, discussions included the use of compulsory purchase powers instead of individual wayleaves, the effect of the CPO on specific landowners, and a separate enquiry relating to the Norwich to Tilbury project. Overall, attendance was modest but positive, with the events helping to address concerns, improve understanding of the Project, and provide reassurance to local residents and landowners.

5.9 Other assistance provided to those affected by the Order

- 5.9.1 As well as seeking to acquire rights by negotiation, NGET has taken further steps to try to assist those affected by the Order. Representatives from NGET and from its consultants, Savills, have maintained an ongoing programme of engagement with affected parties. This engagement has not been limited to objectors to the Order but also extends to any individual or organisation who has raised a query, requested further information or sought clarity. Engagement has been undertaken by way of email, telephone calls and face-to-face meetings and this approach is ongoing, reflecting NGET's commitment to ensure all those affected by the Order are afforded a meaningful opportunity to understand the Project. In the event that voluntary agreements cannot be concluded, parties subject to compulsory acquisition will be entitled to compensation under the CPO Compensation Code.
- 5.9.2 Separately, communications were sent to the following Councils on 10 October 2025, informing them of the Project with follow up meetings also being arranged:
 - (a) Chelmsford City Council
 - (b) Essex County Council
 - (c) Braintree District Council
 - (d) Basildon Borough Council
 - (e) East Herts District Council
 - (f) Rochford District Council
 - (g) Uttlesford District Council

A briefing pack was also shared with local MPs prior to making the Order.

6. ALTERNATIVES

The Project relates to existing infrastructure and, as set out above, the specific need to upgrade the section of overhead lines by way of reconductoring the existing Quad Zebra conductors to Triple Araucaria between Pelham, Twinstead Tee, and Rayleigh is due to the cumulative effect of various project drivers. These include the need to increase electricity supply throughout the region from the North Sea to local and national consumers, realise the benefits of BTNO and improve the health of ageing NGET assets.

6.1 Options Appraisal

- 6.1.1 This paragraph summarises the options that were considered in developing the detailed proposals for the Project. An optioneering exercise was undertaken on 7 June 2024 which resulted in 6 options a summary of which are set out below:

- (a) Do nothing: Maintain the existing Quad Zebra conductors without intervention.
 - (b) Minimal Asset Health Works: Limited steelwork repairs and foundation strengthening without reconductoring.
 - (c) Reconductoring with the same type of conductor: Replace with new Quad Zebra bundles.
 - (d) Reconductoring with high-capacity conductors (preferred option).
 - (e) New OHL Build: Construct additional circuits alongside existing routes.
 - (f) Underground cable solution: Replace or supplement OHL with underground cables.
- 6.1.2 The preferred option (being the Project) is to re-conductor the proposed route to enable the benefits of all the surrounding projects such as BTNO. The option selected for the conductor is triple Araucaria as it provides the greatest capacity for the line and meets the capacity requirements, without building a new OHL. The widespread use of Araucaria conductors ensures a strong supplier base, providing confidence in project scheduling and resource planning and minimising associated project risks. This conductor type is widely used on L6 towers and throughout the transmission system. This option has the lowest capital cost of all of the conductor options that meets the capacity requirements. This option minimises environmental impact compared to new build options and reduces carbon footprint by using fewer conductors.
- 6.1.3 Taking no action is not an alternative option given the urgent and compelling need to upgrade the OHL. Doing nothing does not meet the boundary uplift and capacity requirements and does not align with the regional electricity transmission strategy. If the rest of the network were upgraded without addressing the Project, it could lead to a thermal overloading on the newly formed circuits. This option therefore fails to address thermal constraints and asset health issues.
- 6.1.4 Other reconductoring options were rejected on the basis they were unviable as they could not provide the maximum capacity possible for the towers and they were unable to meet the requirements nor future proof the network. The requirements included the following:
- (a) The towers on the Project route are primarily of an L6 design and as such the options are limited to conductors that can be used on this tower type;
 - (b) The options must have been capable of meeting the ratings specified in the approved System Design Specification (**SDS**);
 - (c) The presence of present and future demand; and
 - (d) Pipeline of expected generation.
- 6.1.5 A new OHL option was rejected because NGET would need to begin the development consent order planning process and the required capacity increase would therefore not be deliverable in the required timeframe (2028 timeline for delivery). There were also cost implications to this option.

7. CONSENTS

7.1 Permitted Development Rights

- 7.1.1 The Project will rely upon Permitted Development rights in the Town and Country Planning (General Permitted Development) (England) Order 2015 or section 55 2(c) of

the Town and Country Planning Act 1990, to the extent that works do not constitute development, to allow for construction activities to take place.

Project Component	Planning consenting position
Temporary construction areas & access	Permitted development pursuant to Class A of Part 4 of Schedule 2 of the GPDO
Overhead line works	Permitted development pursuant to Class B(a) of Part 15 of Schedule 2 of the GPDO
All other works within NGET owned land	Permitted development pursuant to Class B(f) of Part 15 of Schedule 2 of the GPDO

For the set-up of construction compounds, Schedule 2, Part 4, Class A (temporary buildings and structure) would be the preferred method of consenting. Class A states:

“The provision on land of buildings, moveable structures, works, plant or machinery required temporarily in connection with and for the duration of operations being or to be carried out on, in, under or over that land or on land adjoining that land.”

7.2 Planning Permissions and Section 37 consents

- 7.2.1 The construction and operation of the 275kV line from Tilbury to Rayleigh was consented by the Minister of Power under Section 10 (b) of the Schedule to the Electric Lighting (Clauses) Act 1889 under two consents dated 13 December 1956 and 4 October 1957. An additional Section 10 (b) consent was granted on 9 June 1960 for 275/400kV line and inter-connectors relating to the Tilbury to Rayleigh line.
- 7.2.2 Section 10 (b) Ministerial consents were granted on 22 September and 7 November 1966 for the construction and operation of the Rayleigh to Braintree 400kV line. Accordingly, NGET can rely upon the existing consents for the retention of the existing route and therefore no additional planning permission is required.
- 7.2.3 Section 37 of the Electricity Act 1989 is the main means of obtaining consent for minor works relating to overhead lines in England unless they are exempted from such a requirement by meeting certain limitations and restrictions under the Overhead Line (Exemption) (England and Wales) Regulations 2009.
- 7.2.4 For works which involve renewing the existing conductors on a like-for-like basis (i.e. replacing a single conductor with another) by a statutory undertaker, no further planning consents are required as these renewal works are exempted from the definition of ‘development’ pursuant to section 55(2)(c) of the Town and Country Planning Act 1990 .
- 7.2.5 The works do not involve the installation or replacement of an overhead electric line using different physical components or uprating. Although the conductor specification moves from Quad Zebra to Triple Araucaria, this is a component substitution within the existing line, not the installation of a different overhead line. The proposed works renew the existing conductors within the same two circuits, spans, alignment and towers, with no new supports, no new circuits and no relocation. The nominal voltage (400 kV), towers, safety clearances and corridor remain unchanged.
- 7.2.6 On that basis, the works constitute like-for-like repair/renewal of apparatus. Accordingly, section 37 of the Electricity Act 1989 is not engaged, however SSSI assent will be sought from Natural England.

- 7.2.7 The Planning Act 2008 regime is not engaged because the Project does not involve the construction of a new overhead line or a qualifying “replacement” that meets the nationally significant infrastructure thresholds in section 16 of the Planning Act 2008.
- 7.2.8 The Project may require secondary planning permissions through the Town and Country Planning Act 1990 for some construction related activities that would fall outside of the General Permitted Development Order. These secondary planning permissions would require the submission of planning applications to the relevant Local Planning Authorities for determination before the construction works commence. Any planning applications required will be prepared ready to submit to the relevant Local Planning Authorities in September 2026.
- 7.2.9 The proposed construction compounds as part of the Project will fall within Part 4 Class A of the Town and Country Planning (General Permitted Development Order) 2015. This is because the nature of the works would fall within the broad scope of Class A: the Compound is specifically required in connection with the Project works; NGET will remove the works and restore the land as soon as the construction of the main Project works are complete, in consultation with owners and occupiers; and the land proposed for the Compound is adjacent to and adjoins the land required for the Project.
- 7.2.10 NGET will monitor the likelihood of the construction compounds resulting in any significant environmental effects, or the compounds being sited in designated protected areas, such as SSSIs. Should this be the case, then planning permission may be required for the set-up of these compounds but only in the event that the compounds fall under one of the descriptions of development within Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- 7.2.11 Savills and OTW initially contacted the tenant of the proposed main compound location in 2025. OTW and Savills opened discussions to see if they would consider the proposal of the compound. OTW worked with the tenant to ensure the proposed compound location was suitable.
- 7.2.12 In late 2025, Savills and OTW met with the tenant to run through the requirements of the compound and the need for utilities. The tenant informed the Project team that utilities could be attained. OTW inspected the land and its proximity to the Project and commenced negotiation discussions.
- 7.2.13 The tenant of the property informed the owner of the proposal to use the land for a compound. OTW and Savills liaised with the owner and the owner's agent to arrange a site meeting. A site meeting took place on Tuesday 28th April 2026. Discussions during this meeting covered access, utilities, type of material to use, size of the proposed compound and bunding of material. The owner was in principle happy to accommodate a compound, with mentions to their use of the land following the completion of the Project. Further negotiations are being progressed.

Existing Wayleaves and Easements

- 7.2.14 The transmission network, and the manner in which it must be operated and maintained, has evolved (and continues to evolve) considerably since many of the existing easements were granted. Whilst there are still a number of wayleaves in existence NGET considers it essential in any event to secure the grant of permanent easements rather than wayleaves where possible.
- 7.2.15 Wayleaves are, by their nature, terminable by the landowner and tied to the current owner rather than the land itself. For transmission infrastructure, NGET considers it necessary in every case to secure permanent easements in place of wayleaves, consistent with the preference for permanent arrangements over terminable wayleaves recognised at paragraph 2.6.4 of NPS EN-5. This is a distinct point from NGET's case-by-case assessment of the existing easements described below, which concerns the

substantive rights held under an easement already in place, not whether a wayleave should be replaced

- 7.2.16 NGET's statutory duties and licence obligations require it to consider whether the rights already held remain fit for purpose from a network management perspective and will continue to support the efficient and economic operation of the network. This exercise is intended to future-proof the network, not to replace existing rights as a matter of course. As NGET owns and operates nationally significant infrastructure it can only ensure certainty and continuity of electricity supply through permanent easements.
- 7.2.17 NGET's assessment of any given easement is not based on whether it is in NGET's current preferred form, but rather on whether, in substance, it contains the minimum rights necessary to support both the delivery of the Project and the long-term operation, maintenance and management of the network.
- 7.2.18 NGET's assessment is on a case-by-case basis and focuses on the substance of the rights held, not the age or format of the document. NGET recognises that many existing easements already provide rights for the operation and maintenance of its assets. Additional or replacement rights are sought only where an existing right does not, in substance, extend to the works, apparatus or activities required for the Project, does not accommodate the operational, access, safety or maintenance requirements necessary for NGET to manage the wider network on an ongoing economic and efficient basis, or where an associated title issue could otherwise impede NGET in exercising those rights or performing its statutory functions. It is only in such circumstances, where a genuine gap of this kind is identified, that inclusion within the Order is contemplated.
- 7.2.19 Where NGET determines that such a gap exists, its preferred approach remains to engage directly with the relevant landowner to seek a voluntary agreement to vary or augment those rights. NGET will continue to assess existing rights individually and engage proactively with affected landowners with the objective of reaching agreement wherever possible.
- 7.2.20 The powers sought under the Order are a measure of last resort to secure the necessary rights where agreement cannot be reached by consent. They are not sought to replace existing rights indiscriminately, but to ensure that any identified gaps can be addressed where necessary to enable NGET to continue operating, maintaining and developing the network in accordance with its statutory duties, in a consistent and co-ordinated manner.

7.3 Environmental Consents

- 7.3.1 The Project will require the following types of environmental consents, the precise details of which will be identified through the detailed design process:
- (a) SSSI assent from Natural England in relation to Tower 4YL145 (consent to work near or within a SSSI);
 - (b) Flood Risk Activity Permit;
 - (c) European Protected Species licences in relation to bats, badgers, dormouse, GCN, otter, water vole and birds;
 - (d) Hedgerow Removal Notice;
 - (e) Tree Preservation Order Consent;
 - (f) Water Discharge;
 - (g) Waste Permit;

- (h) Notification of works within Local Wildlife Site; and
- (i) Ordinary Watercourse Consent.

- 7.3.2 At this stage, while a range of specific environmental consents and legislative requirements are anticipated, not all applicable permissions can yet be fully defined; ongoing consultation with the relevant regulatory bodies will continue as the Project develops, with all necessary applications submitted to local planning authorities where required.
- 7.3.3 Works affecting protected habitats and species may require, but not be limited to, European Protected Species licences under the Conservation of Habitats and Species Regulations 2017, as well as licences under the Wildlife and Countryside Act 1981 and, where necessary, the Protection of Badgers Act 1992. Additional ornithological consents may be needed where construction risks disturbing breeding or wintering birds, supported by appropriate survey data, mitigation and licences.
- 7.3.4 Tree works required for access, safety clearance or construction activities may trigger felling licences under the Forestry Act 1967 and permissions for works to trees protected by Tree Preservation Orders.
- 7.3.5 Where the Project interacts with rivers, streams or floodplains, Flood Risk Activity Permits under the Environmental Permitting Regulations and Ordinary Watercourse Consents from local authorities or Internal Drainage Boards may be required to regulate temporary crossings, scaffolding or works near watercourses, if required.
- 7.3.6 Any ground disturbance associated with access upgrades, compounds, or tower works may also require archaeological oversight through measures such as watching briefs or Written Schemes of Investigation, in accordance with the Ancient Monuments and Archaeological Areas Act 1979.
- 7.3.7 These consents operate within an overarching framework that includes the Environment Act 2021 and the Electricity Act 1989, under which Section 37 consent requires consultation with environmental stakeholders. Although not anticipated to be EIA Development, the Environmental Impact Assessment Regulations will guide assessment of likely significant environmental effects, supported by project-specific environmental management documents such as the Construction Environmental Management Plan (CEMP), General Environmental Management Plan (GEMP) and Species Protection Plans, ensuring compliance and effective mitigation throughout construction.
- 7.3.8 The associated development relating to the required construction works, including access tracks and CDM locations (i.e. temporary construction and safety zones associated with tower works), can be undertaken under Permitted Development Rights. There are no matters from a consenting perspective which will likely result in objections or represent a fundamental constraint to constructability and thus are not considered to be impediments to the Project. Where survey findings or design refinement identify specific sensitivities (including designated ecological/environmental sites, ancient woodland or protected species), these are anticipated to be manageable through engineered solutions and established consenting, permitting, licensing and mitigation processes prior to construction. Given no new overhead line construction is required, there will be a reduced impact to local stakeholders; all of which have been and continue to be briefed on the scope of works and associated timelines.

7.4 Highway Consents

The Project will likely require works to the public highway, and therefore licences for specific works to highways will need to be applied for via the Street Authorities, and in accordance with the New Roads and Street Works Act 1991.

7.5 Special Category Land & Statutory Undertakers

7.5.1 Land belonging to statutory undertakers

The Order Land includes land owned by statutory undertakers, or land within which the following statutory undertakers have assets. NGET's discussions and negotiations with those affected is ongoing. Please note the Order Land also includes land already owned by NGET. An update will be provided to the Inquiry in due course:

- (a) Affinity Water Limited
- (b) Anglian Water Services Ltd
- (c) Arqiva Ltd
- (d) BT (BT Group Plc)
- (e) Cadent Gas Ltd
- (f) CenturyLink Ltd
- (g) CityFibre Networks Ltd
- (h) Colt Technology Service Group Ltd
- (i) County Broadband
- (j) Energetics Electricity Ltd
- (k) Engie
- (l) Essex & Suffolk Water Ltd
- (m) ESP Utilities
- (n) EXA Infrastructure
- (o) Fulcrum Pipelines Ltd
- (p) Gamma Telecoms Ltd
- (q) Independent Power Networks Ltd
- (r) KCOM Group Plc
- (s) Mobile Broadband Network Ltd
- (t) Neos Networks
- (u) Quadrant Pipelines Ltd
- (v) Sky UK Ltd
- (w) SSE Utility Solutions
- (x) Tata
- (y) Thames Water Ltd

- (z) The Electricity Network Company Ltd
- (aa) UK Power Networks Ltd
- (bb) Utility Assets Ltd
- (cc) Verizon UK Ltd
- (dd) Virgin Media Ltd
- (ee) Vodafone Ltd
- (ff) Zayo

Paragraph 4 (2) of Schedule 3 to the Acquisition of Land Act 1981 provides for special parliamentary procedure to apply to the acquisition of rights over statutory undertakers' land acquired for the purpose of their undertaking. However, paragraph 4 (3) of Schedule 3 confirms that special parliamentary procedure will not apply to the compulsory acquisition of an interest in land where the person acquiring the interest is a statutory undertaker. Accordingly, special parliamentary procedure does not apply to the Order as NGET is a statutory undertaker.

Section 16 of the Acquisition of Land Act 1981 does however apply. It provides that where a CPO includes land acquired by statutory undertakers for their undertakings and the undertaker makes a representation to the appropriate Minister and the Minister is satisfied that the land is used for the undertaking then the CPO cannot be confirmed in respect of that land unless the land can be taken without serious detriment or it can be replaced without serious detriment. As part of Network Rail Infrastructure Limited's (**NRIL**) objection to the Order, NRIL indicated it will be making representations to the Railways Directorate of The Department of Transport under Section 16 and Schedule 3 Part II of the Acquisition of Land Act 1981. However there are ongoing discussions between NGET and NRIL in relation to a Basic Asset Protection Agreement which is hoped to be agreed shortly.

7.5.2 GEMA Consent

- (a) Paragraph 2 of Schedule 3 to the 1989 Act provides that the Secretary of State may not confirm an Order authorising the acquisition of land belonging to another electricity licence holder except with the consent of the Gas and Electricity Market Authority (**GEMA**).
- (b) The Order includes the acquisition of rights over land belonging to another electricity licence holder – specifically NGET is seeking to acquire overhead line rights over land owned by Eastern Power Networks plc. Accordingly, GEMA consent will be required before the Order can be confirmed by the Secretary of State. An application for such consent will be made in parallel with the request for confirmation of the Order and is currently in progress.

7.5.3 Open Space

- (a) The Project currently does not anticipate impacts to Open Space as a result of the construction works, however NGET's consultants instructed on the Project will continue to assess this as design and construction methodologies develop and are finalised. "Open Space" is a term is defined in the Acquisition of Land Act 1981 as "any land laid out as a public garden, or used for the purposes of public recreation, or land being a disused burial ground."

- (b) Whilst no freehold interest is being acquired in Open Space, Overhead Line Rights and Construction and Operation Access Rights to facilitate the Project may be sought in respect of Open Space.
- (c) Should this be the case, these rights engage section 28 and paragraph 6(1)(a) of Schedule 3 to the Acquisition of Land Act 1981 and accordingly an application for a certificate in relation to Open Space will be made to the relevant Secretary of State on the basis that "the land, when burdened with that right, will be no less advantageous to those persons in whom it is vested and other persons, if any, entitled to rights of common or other rights, and to the public, than it was before".

7.5.4 Burial grounds, ecclesiastical property or land which includes listed buildings or is in a conservation area

Based on initial heritage reviews undertaken by the Project team, there is no direct physical impact to any land within burial grounds, ecclesiastical property or land which includes listed or buildings or is in a conservation area. This will be confirmed as designs and construction methodologies are finalised.

7.5.5 Land forming part of a common, a fuel or field garden allotment

- (a) Sections of the Project will pass through areas of land forming part of a common. Whilst no freehold interest is being acquired in land forming part of a common, Overhead Line Rights and Construction and Operational Access Rights to facilitate the Project are being sought.
- (b) NGET where appropriate is in the process of preparing applications for certificates relating to common land, town or village greens under paragraph 6 of Schedule 3 to the Acquisition of Land Act 1981. Specifically, the application will state that the Order is not required to be subject to special parliamentary procedure because the land, when burdened with that right, will be no less advantageous to those persons in whom it is vested and other persons, if any, entitled to rights of common or other rights, and to the public, than it was before (paragraph 6 (1)(a).

7.5.6 Crown Land

The Order Land includes Crown Land. However, the Order excludes the compulsory acquisition of any Crown interest in the Order Land, albeit that the interests of any other parties in land owned by the Crown are included within the Order. There are also interests categorised as Crown Land insofar as they include rights benefiting the Crown.

7.5.7 Land owned by the National Trust

The Order Land does not include any land which is owned by the National Trust.

7.5.8 Land belonging to a local authority

Whilst there is public highway within the Order Land (the status of which is unaffected by the Order), the Order Land does not include any land which is owned by a local authority.

A Public Rights of Way screening exercise is underway to identify potential closures and impacts as a result of the construction works potential impacts will be assessed once construction methods and detailed design is finalised. A Construction Traffic Management Plan and Public Rights of Way Management Plan will be produced where appropriate.

8. FUNDING AND DELIVERY

8.1 Delivery

NGET has an excellent track record in delivering infrastructure projects, including new substations, and has an excellent financial standing as explained below. NGET has extensive experience of building, operating and maintaining linear infrastructure schemes including overhead electricity systems and substations.

8.2 Timetable for delivery

The Project timeline is tied directly to that of BTNO. The current timetable is as follows:

- (a) Front-End Engineering Design (**FEED**) for the Project took place in 2024 with the approval of the preferred option being the Project. FEED is the third stage of the Front-End Loading process, following conceptual design and preliminary engineering and its purpose is to develop detailed design packages, technical specifications and robust cost estimates. The FEED process validates design assumptions and ensures alignment with regulatory and operational requirements before execution. The FEED process for the Project included:
 - (i) detailed engineering studies confirming reconductoring of existing towers with new high-capacity conductors to achieve a 3,326 MVA post-fault rating;
 - (ii) option evaluation: comparing alternatives and selecting a preferred solution;
 - (iii) environmental and sustainability reviews: assessing impacts, applying PAS 2080 carbon management principles and integrating biodiversity and drainage strategies;
 - (iv) cost estimation and risk analysis: producing robust cost models, risk registers and feasibility assessments for Ofgem approval;
 - (v) stakeholder engagement: workshops with system operators and internal teams to validate design and operational requirements;
 - (vi) programme alignment: coordinating timelines with related projects for completion by 2028;
- (b) the main works contractor was selected in July 2025. The main works contractor is Omexom Taylor Woodrow (OTW);
- (c) the “Main Works, Detailed Design and Materials Sanction” was approved on 27 August 2025;
- (d) first site access is proposed for April 2027;
- (e) the system to be available for commercial load in November 2028; and
- (f) delivery of the full project works and construction completed by end of 2028.

8.3 Funding

- 8.3.1 NGET is responsible for developing, constructing, and financing the Project. It is also responsible for the payment of compensation for the acquisition of land and rights required for the Project whether pursuant to a voluntary agreement or the CPO Compensation Code.
- 8.3.2 Ofgem's final decision on funding for the Project was released in December 2025, following consultation on the draft determination that began in mid-2025. Ofgem are

approving £28.1bn of upfront investment across the electricity transmission (ET), gas transmission (GT), and gas distribution (GD) price controls. As per Ofgem's final determinations published on 4 December 2025, the investment will contribute to the funding of electricity transmission upgrade projects like the Project itself.

- 8.3.3 The funding for this Project operates under separate funding to BTNO. An assessment of the required funding has taken account of the total cost of payments for acquiring the rights over the land as part of the Project. This total cost has included the estimated value of compensation payable in relation to disturbance, severance and injurious affection, third party professional fees, blight and claims arising under both Section 10 of the Compulsory Purchase Act 1965 and Part 1 of the Land Compensation Act 1973.
- 8.3.4 The total "Estimate to Complete" figure submitted to Ofgem under the T3 application was £109.7 million.
- 8.3.5 Funding for the Project is being sanctioned by NGET in three main phases; the FEED which has already been sanctioned, the Detailed Design, Materials Ordering and CPO which has already been sanctioned and Construction which is yet to be sanctioned for September 2027. The requisite funding is available to meet the implementation and land acquisition/compulsory purchase compensation costs associated with the Project as and when required (including any advance payments).
- 8.3.6 Given NGET's strong credit rating, the requisite funding is available to meet the implementation and land acquisition/compulsory purchase compensation costs associated with the Project as and when required (including any advance payments).
- 8.3.7 Accordingly, NGET considers that the criteria in paragraph 14 of the Guidance is met.

9. RESPONSE TO OBJECTIONS

- 9.1 A total of 82 objections were received to the Order. NGET's responses to the objections are set out at Appendix B.
- 9.2 No objectors object to the Project in principle, however, individual objections include the contention that the existing easements are already sufficient, concerns about the range of powers being sought, whether a proportionate approach to compulsory acquisition has been taken as well as requests for clarifications or further information as to the extent of the impact of the CPO. Where objectors have identified a need for further information, NGET has been working to respond to all requests for clarification.
- 9.3 A small number of objections raised the impact of the Project on human rights. However the position remains that the Project will use methods of working that will minimise any impact on owners and occupiers of the relevant plots affected. NGET continues to seek to acquire the rights in land which are required to deliver the Project through private negotiation, and this is running in parallel with the CPO process. It is reiterated that each right described in the Order is required either for the purposes of the Project or is incidental to the Project.
- 9.4 NGET does not consider that any of the issues raised in the objections are insurmountable and will continue to engage with objectors with a view to resolving concerns, where possible, ahead of the Inquiry.

10. STATEMENT JUSTIFYING EXTENT OF SCHEME TO BE DISREGARDED FOR THE PURPOSES OF ASSESSING COMPENSATION IN THE NO SCHEME WORLD

- 10.1 Paragraph 215.1(vii) (now Paragraph 239.1(vii) as per the updated Guidance), Section 14, of the Guidance requires a statement to be included in every statement of reasons which justifies the extent of the scheme to be disregarded for the purposes of assessing compensation in the 'no-scheme world.'

- 10.2 Section 6A (1) of the Land Compensation Act 1961 (LCA 1961) provides that *"the no scheme principle is to be applied when assessing the value of land in order to work out how much compensation should be paid by the acquiring authority for the compulsory acquisition of land."*
- 10.3 In most cases the 'scheme' means the scheme of development underlying the acquisition and provided for by the Order unless it is shown that the underlying scheme is larger than, but incorporating the scheme provided by the Order.
- 10.4 In the case of the Project, the 'scheme' is the Project as a whole which is in part enabled by the Order.

11. HUMAN RIGHTS AND EQUALITY ACT 2010

11.1 Human Rights

- 11.1.1 Each right over each plot of land described in the Order is required either for the purposes of the Project or is incidental to the Project.
- 11.1.2 The European Convention rights potentially applicable to the making of the Order are Articles 6 and 8 and Article 1 of the First Protocol (as contained in Schedule 1 to the Human Rights Act 1998).
- 11.1.3 Relevant parts of Article of the First Protocol of the European Convention on Human Rights (**Convention**) provide:
- "Every natural or legal person is entitled to peaceful enjoyment of his possessions and no one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law."*
- 11.1.4 Relevant parts of Article 8 of the Convention provide:
- "1. Everyone has the right to respect for his private and family life, his home and his correspondence.*
- 2. There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of... the economic well-being of the country..."*
- 11.1.5 The Order has been made pursuant to Section 10 and Schedule 3 of the 1989 Act which authorises NGET to acquire land, new rights and existing rights compulsorily.
- 11.1.6 NGET is taking a proportionate approach to compulsory acquisition. NGET is only seeking to acquire those rights which are absolutely necessary to facilitate delivery of the Project. NGET has sought to acquire the rights and interests in land which are required to deliver the Project through private negotiation. Details of negotiations are set out in Section 5.
- 11.1.7 Notwithstanding the efforts that have been made to acquire interests in the land by way of voluntary agreement, as at the date of this Statement, NGET has been unable to secure all of the requisite interests through negotiation. It is therefore necessary to seek compulsory powers to enable the delivery of the Project. Negotiations to acquire interests by private treaty will continue in parallel with the CPO process.
- 11.1.8 Section 6 of the Human Rights Act 1998 prohibits public authorities from acting in a way which is incompatible with rights protected by the Convention. The position is summarised in paragraph 12 of the Overview of the Guidance, which states that a compulsory purchase order should only be made where there is a *"compelling case in the public interest"*. NGET considers that there is a compelling case in the public interest that the rights referred to in the Order be acquired in order to achieve the purposes described in this Statement.

- 11.1.9 If the Secretary of State agrees with NGET that there is a compelling case in the public interest, they may confirm the Order. If the Order is confirmed, compensation may be claimed by persons whose interests in land have been acquired or whose possession of land has been disturbed proportionate to any losses that they incur as a result of the acquisition.
- 11.1.10 In the circumstances, if the Order is confirmed, it is considered that the compulsory acquisition of rights referred to in the Order will not conflict with Article 1 of the First Protocol or Article 8 of the European Convention as any interference with the rights will be in accordance with the law, justified and proportionate.
- 11.1.11 Relevant parts of Article 6 provide that:
- "1. In the determination of his civil rights and obligations ... everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law."*
- 11.1.12 So far as the Order is concerned, any owner, lessee or occupier of land included in the Order will be notified and may have the opportunity to make representations to the Secretary of State and to be heard at a public inquiry before a decision is made as to whether or not the Order should be confirmed, and would in any event have legal rights under the Acquisition of Land Act 1981 to challenge any order made on the relevant statutory grounds.
- 11.1.13 NGET is satisfied that there are no planning, financial or other impediments to the implementation of the Project and that the Project is therefore likely to proceed if the Order is confirmed. NGET has sought to keep any interference with the rights of those within interests in the Order Land to a minimum. The land within the Order has been limited to the minimum required for the Project infrastructure to be installed, operated and maintained.
- 11.1.14 For the reasons set out above, there is considered to be a compelling case in the public interest to proceed with the Order to facilitate a section the upgrading of a section of OHL in the East Anglia Region by way of reconductoring the existing Quad Zebra conductors to Triple Araucaria between Pelham, Twinstead Tee, and Rayleigh.

11.2 Equality Act 2010

- 11.2.1 Although NGET is not directly subject to the Public Sector Equality Duty (PSED), information is provided in relation to the Project's interaction with Section 149 of the Equality Act 2010 to assist the Secretary of State with their discharge of that duty. Section 149 requires due regard to be given to the need to:
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it; and
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 11.2.2 The relevant protected characteristics are: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 11.2.3 In the event that NGET is required to self-confirm the Order, the PSED will be applied as though NGET were subject to it.

- 11.2.4 The Project has been designed to keep the disruption to those living along the route to a minimum; this will not cause differential impacts to those individuals or groups of individuals who share a relevant protected characteristic.
- 11.2.5 As mentioned in Section 5, NGET is undertaking negotiations with landowners impacted by the Order and has made particular efforts to avoid the need to use compulsory purchase powers by negotiating by private treaty and by using its powers under the New Roads and Street Works Act 1991. Furthermore, NGET is using existing sites in its ownership, such that this has minimised any disadvantages to those who share a relevant protected characteristic.
- 11.2.6 NGET has carried out community engagement as per Section 5 and will continue to do so.
- 11.2.7 In light of the above, NGET does not currently consider that the Project will give rise to any disproportionate or differential impacts on persons who share a relevant protected characteristic as defined in the Equality Act, as compared to persons who do not share such relevant protected characteristic. NGET considers that the Order is appropriate in the context of the PSED set out in section 149 of the Equality Act 2010. NGET's position will be monitored and revisited should any persons or categories of persons be identified who may adversely be impacted by the Project.

12. CONCLUSION

- 12.1 NGET has made the Order pursuant to section 10 of, and Schedule 3 to, the 1989 Act, and having regard to the Guidance. If confirmed by the Secretary of State for Energy Security and Net Zero, the Order will authorise NGET to purchase compulsorily the new rights in land required for the Project.
- 12.2 This Statement sets out the nature of the Project in Section 3. It summarises the need for the Project and in particular the increase in the transmission capacity in the region which is required in order to remove bottlenecks and enable continued connection of renewable generation assets.
- 12.3 Section 4 describes the pressing need for the Project and Section 6 describes which alternatives have been considered. As detailed in Section 5, NGET has been continuing to seek to negotiate voluntary agreements with landowners for the rights.
- 12.4 NGET has explained the funding basis for the Project in Section 8.
- 12.5 In NGET's view, this compelling case in the public interest justifies the proportionate interference with, and the overriding of, the private interests of those in the Order land as considered in Section 10 given that NGET are seeking a proportionate approach to compulsory acquisition as described below.
- 12.6 Although 82 objections were received during the objection period, none of the objectors object to the Project in principle, rather there are individual raised which are being sensitively and carefully dealt with on a case by case basis.
- 12.7 The public benefits of the Project substantially outweigh the private interests affected, which in any event NGET has sought to minimise by only acquiring rights over the majority of the Order Land, rather than freehold interests, as well as amending the Project to address specific landowner concerns where reasonably practicable to do so.
- 12.8 NGET anticipates that all requisite planning consents will be in place for the Project by the time that the Order enables the exercise of powers of compulsory acquisition and there are no physical or legal impediments to the implementation of the Order. The Secretary of State should confirm the Order accordingly.

13. FURTHER INFORMATION

13.1 Negotiation of acquisitions

Owners and occupiers of land impacted by the Project who wish to negotiate a voluntary agreement or discuss matters of compensation should contact NGET using the following contact details:

- (a) By Post – Freepost PELHAM TO RAYLEIGH
- (b) By email – pelhamtorayleigh@savills.com
- (c) By Phone – 0800 5677 200

13.2 Compensation

13.2.1 Provision is made by statute with regard to compensation for the compulsory acquisition of land and the depreciation in value of properties. More information is given in the series of booklets published by the Department for Housing, Communities and Local Government entitled "Compulsory Purchase and Compensation" listed below:

- (a) **Booklet No. 1** - Compulsory Purchase Procedure.
- (b) **Booklet No. 2** - Compensation to Business Owners and Occupiers.
- (c) **Booklet No. 3** - Compensation to Agricultural Owners and Occupiers.
- (d) **Booklet No. 4** - Compensation for Residential Owners and Occupiers.

13.2.2 These booklets are available to download for free online at:
<https://www.gov.uk/government/collections/compulsory-purchase-system-guidance>.

13.2.3 A copy of the Statement of Reasons, this Statement, the Appendices, the Order, Order Maps and the documents listed in Schedule 1 are available for inspection at:
www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/pelham-to-rayleigh.

13.2.4 Hard copies of the documents referenced in paragraph 13.2.4 above may be requested using the contact details set out in paragraph 13.1.

12 August 2026

Womble Bond Dickinson (UK) LLP

Solicitors to National Grid Electricity Transmission plc

SCHEDULE 1

List of Documents

CPO AND RELATED DOCUMENTS

- 1.1 The National Grid Electricity Transmission plc (Pelham to Rayleigh Overhead Line Reinforcement) Compulsory Purchase Order 2026 (as sealed)
- 1.2 CPO Plan: Map showing route and position of project
- 1.3 Statement of Reasons
- 1.4 Protected Assets Certificate
- 1.5 General Certificate

LEGISLATION

- 1.6 Electricity Act 1989
- 1.7 Acquisition of Land Act 1981
- 1.8 New Roads and Street Works Act 1991
- 1.9 Compulsory Purchase Act 1965
- 1.10 Land Compensation Act 1961
- 1.11 Land Compensation Act 1973
- 1.12 Town and Country Planning Act 1990
- 1.13 Human Rights Act 1998
- 1.14 Equality Act 2010
- 1.15 Planning Act 2008
- 1.16 Electric Lighting (Clauses) Act 1889
- 1.17 Wildlife and Countryside Act 1981
- 1.18 Protection of Badgers Act 1992
- 1.19 Forestry Act 1967
- 1.20 Ancient Monuments and Archaeological Areas Act 1979[FK2.1]
- 1.21 Environment Act 2021
- 1.22 The Compulsory Purchase (Inquiries Procedure) Rules 2007
- 1.23 Town and Country Planning (General Permitted Development) (England) Order 2015
- 1.24 Overhead Line (Exemption) (England and Wales) Regulations 2009
- 1.25 Conservation of Habitats and Species Regulations 2017

1.26 European Convention of Human Rights

GUIDANCE AND POLICY

1.27 Guidance on the Compulsory Purchase Process (2026)

1.28 The Ten Point Plan for a Green Industrial Revolution (2020)

1.29 The Energy White Paper (2020)

1.30 Business Energy Security Strategy (2022)

1.31 'Powering Up Britain' - Energy Security Plan (2023)

1.32 'Powering Up Britain' – The Net Zero Growth Plan (2023)

1.33 'Clean Power 2030 Action Plan (2025)

1.34 Net Zero Strategy: Build Back Greener (2021)

1.35 'Mission Zero' – Independent Review of Net Zero (2023)

1.36 Future Energy Scenarios: Pathways to Net Zero (2025)

1.37 Overarching National Policy Statement for Energy (EN-1) (2025)

1.38 National Policy Statement for Electricity Networks Infrastructure (EN-5) (2025)

1.39 National Planning Policy Framework

1.40 Uttlesford Local Plan

1.41 Braintree District Local Plan 2033

1.42 Chelmsford Local Plan 2013–2036

1.43 Basildon District Local Plan

1.44 Rochford District Core Strategy

1.45 Rochford District Development Management Plan

1.46 Essex Minerals Local Plan 2014

1.47 Essex and Southend-on-Sea Waste Local Plan 2017

1.48 NGET Environmental Sustainability Policy

1.49 NGET Stakeholder, Community and Amenity Policy

1.50 PAS 2080

Department for Housing, Communities and Local Government booklets on:

1.51 Booklet No. 1 (Compulsory Purchase Procedure);

1.52 Booklet No. 2 (Compensation to Business Owners and Occupiers);

1.53 Booklet No. 3 (Compensation to Agricultural Owners and Occupiers); and

1.54 Booklet No. 4 (Compensation for Residential Owners and Occupiers).

APPENDICES

Appendix A: Updated Engagement Log – available at www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/pelham-to-rayleigh

Appendix B: Objections and response to Objections – available at www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/pelham-to-rayleigh