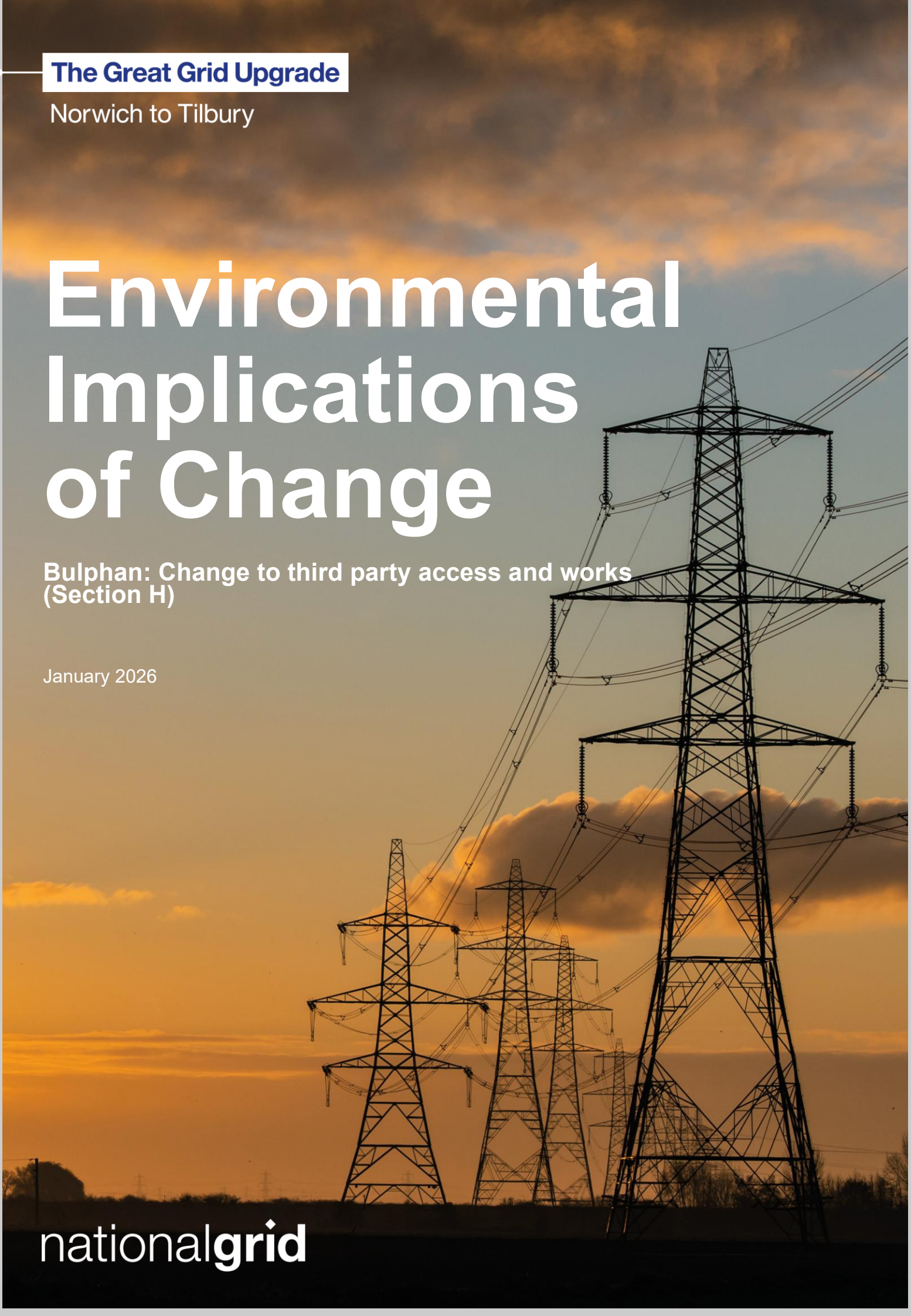
The Great Grid Upgrade

Norwich to Tilbury

Environmental Implications of Change

Bulphan: Change to third party access and works (Section H)

January 2026



nationalgrid

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1. Environmental Implications of Change – Bulphan: Change to third party access and works

1.1 Introduction

1.1.1 National Grid submitted its application for development consent for Norwich to Tilbury ('the Project') in August 2025. The application was accepted for Examination by the Planning Inspectorate on 26 September 2025.

1.1.2 While the application has been submitted and accepted for Examination, National Grid has continued to undertake technical work, along with engagement with stakeholders. As a result of this work, National Grid is proposing to incorporate two proposed changes into the Project:

- Bulphan: Change to third party access and works (Change Request 1)
- Little Bromley: Change to the East Anglia Connection Node (EACN) access (Change Request 2)

1.1.3 The proposed changes apply to very discrete geographical areas of the Project and do not substantially alter the Project as a whole. The proposed changes respond positively to comments from stakeholders and are considered necessary to avoid or minimise potential operational impacts of the Project on existing third-party infrastructure and land uses.

1.1.4 Due to the stage of the Project in the planning process, National Grid must apply to make changes to the application to the Examining Authority. Before submitting the change applications, National Grid is consulting on the proposed changes between 19 January and 23 February 2026.

1.1.5 National Grid has prepared Environmental Implications of Change (EIC) reports for both of the proposed changes as part of the consultation materials.

1.2 Purpose of this EIC

1.2.1 This EIC supports Change Request 1. This document should be read alongside the associated Bulphan: Change to third-party access and works Consultation Leaflet.

1.2.2 National Grid is proposing an increase in the Order Limits to facilitate works required for the protection of the existing Thames to Buncefield Multifuel Pipeline, west of Langdon Hills Golf Club. This proposed change responds to feedback concerning accelerated corrosion on existing buried metallic services received from the British Pipeline Agency (BPA) Ltd who act as the agent for the owner, United Kingdom Oil Pipelines (UKOP) Limited.

1.2.3 This EIC sets out the potential for any new or different likely significant environmental effects associated with the proposed change, with reference to the assessment in the

submitted Environmental Statement (ES) (APP-123 to APP-287)[1] prepared for the Project. The ES (APP-123 to APP-287) (and its appendices and figures) should be viewed alongside this EIC.

1.2.4 The published ES can be viewed on the Norwich to Tilbury page of the Planning Inspectorate's National Infrastructure Planning website under the Documents tab: https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN020027/documents

1.2.5 The EIC for Change Request 2 can be found on the Project website: nationalgrid.com/norwich-to-tilbury

1.3 Environmental Impact Assessment

1.3.1 Environmental Impact Assessment (EIA) is a process that is used to identify the likely significant effects that could occur as a result of a project. The information gathered is taken into account by the decision-making body when determining the application for consent.

1.3.2 The first stage in the EIA process is to prepare a Scoping Report that sets out the likely significant environmental effects from a project and proposes the scope (approach and methodology) of the EIA bearing in mind those identified effects.

1.3.3 National Grid submitted the Scoping Report (APP-288 to APP-296) for the Project to the Planning Inspectorate in November 2022. The Planning Inspectorate provided a Scoping Opinion (APP-297) on behalf of the Secretary of State in December 2022. This included a number of items to be considered when producing the ES.

1.3.4 Following receipt of the Scoping Opinion (APP-297), an ES was prepared for the Project. The ES is a document that presents the results of the EIA undertaken for a project. It identifies the likely significant environmental effects that may result if a project were to be implemented, and any proposed mitigation to avoid or reduce those significant environmental effects to a non-significant level (where possible). The ES (APP-123 to APP-287) was submitted as part of the application for development consent for the Project in August 2025.

1.3.5 An Outline Code of Construction Practice (CoCP) (APP-300) was also published as part of the Development Consent Order (DCO) application in August 2025. This included the general principles and good practice control and management measures that National Grid proposes to reduce the effects of the Project on the environment. The commitments set out in the Outline CoCP (APP-300) also apply to the proposed change that is the subject of this consultation.

1.3.6 National Grid also submitted a suite of management plans for the Project with the DCO application. These included further details of how the Project would be managed during construction, should consent be granted. Management plans and other related documents that were submitted (a number of the management plans outlined below were provided as appendices to the Outline CoCP (APP-300)) included:

- Outline Construction Traffic Management Plan (CTMP) (APP-309)
- Outline Landscape and Ecological Management Plan (LEMP) (AS-046)

[1] This EIC uses the reference numbers as set out in the Examination Library: EN020027-000552-2 Norwich to Tilbury Examination Library PDF .pdf

- Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (WSI) (APP-328)
- Outline Public Rights of Way (PRoW) Management Plan (APP-329)
- Outline Site Waste Management Plan (APP-302)
- Outline Soil Resources Plan (APP-303)
- Outline Dust Management Plan (APP-304)
- Community Engagement and Public Information (APP-305)
- Outline Noise and Vibration Management Plan (APP-306)
- Outline Flood Warning and Evacuation Plan (APP-307)
- Greenhouse Gas Reduction Strategy (APP-308).

1.3.7 The commitments set out in the management plans listed above also apply (to the extent relevant) to the proposed change that is the subject of this consultation.

1.3.8 The Scoping Report, Scoping Opinion, Outline CoCP and Management Plans listed above can be viewed on the Norwich to Tilbury page of the Planning Inspectorate's National Infrastructure Planning website under the Documents tab: https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN020027/documents

1.4 Description of the Proposed Change

1.4.1 The proposed alignment for the Project (between Pylon TB239 and TB240) (see Section H of Works Plans (APP-024)) will cross the Thames to Buncefield Multifuel Pipeline to the west of Langdon Hills Golf Club. The pipeline, which forms part of the national fuel infrastructure network, is operated by the BPA who act as agent for the owner UKOP.

1.4.2 As part of ongoing technical and survey work to inform detailed design, National Grid has undertaken pipeline studies. The work identified the need for mitigation works (underground installation of anti-corrosion earthing strips) to be carried out in respect of the existing Thames to Buncefield Multifuel Pipeline.

1.4.3 The proposed change includes:

- The installation, along an approximately 2,700 m length of affected pipeline, of anti-corrosion earthing strips running in parallel with the existing BPA pipeline.
- Two temporary construction compounds have been proposed to facilitate delivery works. These compounds will largely be used for material and equipment storage along with welfare facilities.
- Test posts on field boundaries would be required and would be 400 mm to 1,200 mm in height.
- Access is assumed to be along existing field accesses and trackway with a width of 3 m may be used where required.

1.4.4 The anti-corrosion earthing strips are proposed to be buried at the same depth as the pipeline. At hedgerows, electrical cables would be buried below ground, to connect each side of the anti-corrosion earthing strip to the test post. Depth and location would be adjusted on site to reduce damage to hedgerows.

1.4.5 Works to install the anti-corrosion earthing strips are anticipated to take between five to six months to complete (including initial mobilisation activities). It is assumed that traffic movements associated with those works would include:

- Up to two excavators to be dropped off at the start of installation and picked up at the end of construction.
- Up to two welfare vans every day.
- One Supervisor's 4x4 vehicle every day.
- Delivery of materials to site on an Heavy Goods Vehicle (HGV) (one per week).
- One additional 4x4 vehicle every day.

1.4.6 Following construction, land within the 20 m working swathe would be reinstated and returned to its former use.

1.4.7 A figure of the proposed change is presented in the associated Bulphan: Change to third-party access and works Consultation Leaflet.

1.5 Environmental Implications of Change Approach and Method

1.5.1 This document sets out the environmental effects that are relevant in relation to the proposed change set out in Section 1.4 above. The methodology used in this EIC follows the same approach that was adopted in the ES (Chapter 5: EIA Approach and Method (APP-135)).

1.5.2 This EIC focuses on the likely significant environmental effects during the construction and operation (and maintenance) phases that would be material to a decision to consent the Project.

1.5.3 There are no anticipated changes to decommissioning to those set out in the ES, which is that decommissioning would not happen for a significant period of time and would be in accordance with the relevant consenting regime. Therefore, decommissioning is not discussed further in this EIC.

1.5.4 The residual effects noted in this EIC take into account embedded, standard and additional mitigation measures that were identified within the ES (APP-123 to APP-287) submitted with the DCO application, that would help to avoid or reduce significant environmental effects that may otherwise be experienced during the construction and operation (and maintenance) phases of the Project.

1.5.5 ES Chapter 4: Project Description (APP-130) includes a number of Project assumptions regarding the construction programme, working methods, for example how sensitive features would be crossed (see sections 4.5, 4.7, 4.8 and 4.9). These assumptions all still apply and have been used when assessing the proposed change presented within this EIC.

1.6 Regulatory and Planning Policy Context

1.6.1 This EIC has given due consideration to relevant national policy and local policy, including those outlined in ES Chapter 2: Key Regulatory and Planning Policy Context (APP-126). This EIC has considered those environmental topics presented within the relevant National Policy Statements (NPS); the Overarching NPS for Energy (EN-1)

(DESNZ, 2025a) and the NPS for Electricity Networks Infrastructure (EN-5) (DESNZ, 2025b).

1.6.2 The National Planning Policy Framework (NPPF) (MHCLG, 2025) states that effective strategic collaboration across local planning authority boundaries will play a vital and increasing role, including for delivering strategic infrastructure and for consistency in policy making based on the information available (paragraphs 24, 27 and 28); and that local authorities should support planning applications for all forms of renewable and low carbon development, giving significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future (paragraph 168).

1.6.3 On 16 December 2025, the Government published a consultation seeking views on the revised version of the NPPF. The consultation on the revised version of the NPPF runs until 10 March 2026 and it is anticipated that an amended version will be published in 2026. Notwithstanding its current draft status, local authorities should be aware that draft policies W1 (Planning for Energy and Water) and W3 (Renewable and Low Carbon Energy Development and Electricity Network Infrastructure) in combination add support to the role and function of National Grid insofar as the administering of its responsibilities is concerned, including expansion of the existing electricity network where required. Local authorities should be cognisant of what appears to be a positive shift in favour of projects such as Norwich to Tilbury in the emerging NPPF.

1.7 Environmental Implications of Change

1.7.1 A review has been undertaken of the proposed change set out in Section 1.4 and its likely environmental implications against the assessment reported in the ES (APP-123 to APP-287). A review has been undertaken against each of the technical topics covered by the ES, with respect to this location within the Project, including: agriculture and soils; air quality; ecology and biodiversity; contaminated land, geology and hydrogeology; health and wellbeing; historic environment; hydrology, land drainage and flood risk; landscape and visual; noise and vibration; socio-economics, recreation and tourism; and traffic and transport. The same methodologies and principles have been applied as set out in the ES (APP-123 to APP-287) based on the information available.

1.7.2 National Grid has also considered again the topics that were scoped out as separate ES chapters in the EIA, including major accidents and disasters, climate change and materials and waste, in light of the proposed change. This review concluded that following the implementation of mitigation measures set out in the ES (APP-123 to APP-287) and due to the nature of the works, there would be no significant effects on these topics and therefore they would not need to be scoped in for further assessment.

1.7.3 Table 1.1 outlines the environmental implications of the proposed change. The information provided is considered to be proportionate and appropriate information on the environmental implications when looked at both in local context and in the context of the Project as a whole.

1.7.4 The relevant environmental features noted in this section are shown on the figure in Annex A of this EIC.

Table 1.1 - Environmental implication of change

Topic	Comments / observations / identified environmental implications of the proposed change when compared to the assessment presented in the ES
Agriculture and Soils	Following the implementation of mitigation measures set out in ES Chapter 6: Agriculture and Soils (APP-138) and the Outline Soil Resources Plan (APP-303), there would be no change to the type or significance of effects as a result of the proposed change, when compared to the ES.
Air Quality	Following the implementation of mitigation measures set out in ES Chapter 7: Air Quality (APP-147) and the Outline Dust Management Plan (APP-304), there would be no change to the type or significance of effects as a result of the proposed change, when compared to the ES.
Ecology and Biodiversity	The proposed change would slightly increase the amount of habitat temporarily impacted in the short-term, as a result of the required excavation works. However, habitats along the existing pipeline are predominantly arable and therefore of low ecological value. There would be no additional impacts on irreplaceable habitats or priority habitats of principal importance. Impacts to tree and hedgerows on field boundaries would be avoided as part of this change. Following implementation of mitigation measures set out in the Outline LEMP (AS-046) and the Outline CoCP (APP-300), there would be no change to the type or significance of effect on habitat features as presented within ES Chapter 8: Ecology and Biodiversity (AS-026). The proposed change is not expected to cause significant impacts on any designated sites or protected species, given the distance away from any designated feature and the small-scale works associated with the proposed change. Overall, there would be no change to the type or significance of ecology and biodiversity effects as a result of the proposed change, when compared to the ES Chapter 8: Ecology and Biodiversity (AS-026).
Contaminated Land, Geology and Hydrogeology	Following the implementation of mitigation measures set out in ES Chapter 9: Contaminated Land, Geology and Hydrogeology (APP-181) and the Outline CoCP (APP-300), there would be no change to the type or significance of effects as a result of the proposed change, when compared to the ES.
Health and Wellbeing	Following the implementation of mitigation measures set out in ES Chapter 10: Health and Wellbeing (APP-192) and the Outline CoCP (APP-300), there would be no change to the type or significance of effects as a result of the proposed change, when compared to the ES.
Historic Environment	The works associated with constructing the proposed change would increase temporary impacts on the setting of the following three listed buildings owing to the presence of construction works: • Grade II* listed Old Plough House • Grade II listed Garlesters

Topic	Comments / observations / identified environmental implications of the proposed change when compared to the assessment presented in the ES
	• Grade II listed Great Malgraves. The setting of the grade II* listed Old Plough House and grade II listed Garlesters, and Great Malgraves were assessed as 'no impact' in ES Chapter 11: Historic Environment (APP-208), however, this would increase to negligible during construction for the proposed change as a result of construction activity within the settings of these assets. The proposed change is not expected to cause impacts on buried archaeology, given the proximity to the existing pipeline and disturbance caused to construct the BPA pipeline. The proximity to the BPA pipeline and the previous construction disturbance would mean that geophysical survey would not be effective to evaluate potential archaeology, and archaeological trial trenching would be unsafe in proximity to the pipeline. Therefore, as a precautionary measure archaeological monitoring and recording during construction could be undertaken if further desk-based research indicates there is high archaeological potential and those remains are unlikely to have been affected by construction of the pipeline. There would be no other change to the historic environment baseline or to the type or significance of any other historic environment effects as a result of the proposed change, when compared to the ES Chapter 11: Historic Environment (APP-208) and the Outline Archaeological Mitigation Strategy and Outline WSI (APP-328).
Hydrology and Land Drainage	The majority of the works associated with the proposed change would be located in Flood Zone 1, however, there are areas that would be located within the fluvial floodplain. As a result, the proposed change would result in more construction works being undertaken in the floodplain compared to the design presented in ES Chapter 12: Hydrology Land Drainage and Flood Risk (APP-221). The proposed change would locate two of the proposed test posts (to the north of Doesgate Lane) in Flood Zone 3. Parts of the proposed change (including four test posts) would be located within areas at high risk of surface water flooding. The construction compounds proposed to support the works are located in low risk flood zones. The proposed test posts would be small enough to have no perceptible impact on floodplain storage or surface water flow paths. Following the implementation of mitigation measures set out in ES Chapter 12: Hydrology Land Drainage and Flood Risk (APP-221) and the Outline Flood Warning and Evacuation Plan (APP-307), there would be no change to the type or significance of hydrology and land drainage effects as a result of the proposed change, when compared to the ES.

Topic	Comments / observations / identified environmental implications of the proposed change when compared to the assessment presented in the ES
Landscape and Visual	The works associated with the construction of the proposed change would increase the extent of temporary impacts in the following Landscape Character Areas (LCA) and Visual Receptor Areas (VRA): • Bulphan Fenland LCA • Langdon Lower Hill Slopes LCA • VRA H1 Bulphan • VRA H2 Horndon on the Hill The proposed change would slightly extend the influence of construction works within the landscapes of Bulphan Fenland LCA and Langdon Lower Hill Slopes LCA. The overall significance of landscape effects would remain as reported in ES Chapter 13: Landscape and Visual (APP-226). The proposed change would introduce short term, temporary construction works closer to the settlement of Bulphan, within VRA H1 (construction works associated with the Project presented in ES Chapter 4: Project Description (APP-130) would be approximately 1 km away whereas the proposed change would locate construction access and construction works adjacent to the settlement). There would be a temporary construction compound north of Doesgate Lane. The change would also introduce short term, temporary construction works closer to the local community along Lower Dunton Road / B1007 within VRA H2 (construction works would be approximately 1.2 km away for the design as presented in ES Chapter 4: Project Description (APP-130); the proposed change would reduce this distance to approximately 0.5 km). There would be a temporary construction compound in farmland west of Great Malgraves. Bearing in mind the above, these additional construction works would be transient and estimated to be up to six months, the changes would not notably alter the visual effects reported in ES Chapter 13: Landscape and Visual (APP-226). The overall significance of visual effects would remain as reported in ES Chapter 13: Landscape and Visual (APP-226). During operation (and maintenance) the proposed test posts would be small enough for the proposed change to have negligible impacts on landscape character and visual amenity. The proposed change would slightly increase the spread of landscape and visual effects during construction in a localised area. However, it is anticipated that the effects of the change would be short term, temporary and not significant. During operation (and maintenance), the change would have negligible landscape and visual effects. Overall, following the implementation of any mitigation as set out in the ES Chapter 13: Landscape and Visual (APP-226) and Outline LEMP (AS-046),

Topic	Comments / observations / identified environmental implications of the proposed change when compared to the assessment presented in the ES
	there would be no change to the significance of landscape and visual effects as a result of the proposed change, when compared to the ES.
Noise and Vibration	Following the implementation of mitigation measures set out in ES Chapter 14: Noise and Vibration (APP-256) and the Outline Noise and Vibration Management Plan (APP-306), there would be no change to the type or significance of effects as a result of the proposed change, when compared to the ES.
Socio-economics, Recreation and Tourism	Following the implementation of mitigation measures set out in ES Chapter 15: Socio-economics Recreation and Tourism (APP-265) and the Outline CoCP (APP-300), there would be no change to the type or significance of effects as a result of the proposed change, when compared to the ES.
Traffic and Transport	Following the implementation of mitigation measures set out in ES Chapter 16: Traffic and Transport (APP-271), the Outline CTMP (APP-309) and Outline PRoW Management Plan (APP-329), there would be no change to the type or significance of effects as a result of the proposed change, when compared to the ES.
Topics Scoped out of the ES (APP-123 to APP-287)	Following the implementation of mitigation measures set out in ES (APP-123 to APP-287) and the Outline CoCP (APP-300), and due to the nature of the works (mitigation measures to prevent accelerated corrosion on existing buried metallic services of the existing Thames to Buncefield Multifuel Pipeline) there would be no significant effects on Major Accidents and Disasters, Climate Change or Materials and Waste, therefore these topics would not need to be scoped in for further assessment.

1.8 Conclusion and Next Steps

1.8.1 This EIC is part of the consultation for Change Request 1, which National Grid is undertaking in respect to the proposed change.

1.8.2 The proposed change would not result in any new or different likely significant effects, or require additional mitigation measures, when compared to the submitted ES (APP-123 to APP-287). The published ES can be viewed on the Norwich to Tilbury page of the Planning Inspectorate's National Infrastructure Planning website under the Documents tab: https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN020027/documents

1.8.3 This review has concluded that the proposed change (either in isolation or in combination with Change Request 2) is not likely to affect the overall assessment and conclusions with respect to the likely significant effects presented within the ES (APP-123 to APP-287).

1.8.4 Baseline information (and environmental surveys) and further assessment associated with the proposed change will be submitted to the Planning Inspectorate as part of the change application. An ES Addendum will be produced for the purposes of the change application which National Grid expects to submit to the Planning Inspectorate in Spring 2026. National Grid will have regard to consultation feedback, including in respect of this EIC, when preparing the ES Addendum.

Abbreviations

BPA	British Pipeline Agency
CoCP	Code of Construction Practice
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DESNZ	Department for Energy Security and Net Zero
EACN	East Anglia Connection Node
EIA	Environmental Impact Assessment
EIC	Environmental Implication of Change
ES	Environmental Statement
HGV	Heavy Goods Vehicle
Km	kilometre
LCA	Landscape Character Area
LEMP	Landscape and Ecological Management Plan
m	metre
mm	millimetre
MHCLG	Ministry of Housing, Communities and Local Government
NPPF	National Planning Policy Framework
NPS	National Policy Statement
PRoW	Public Right of Way
UKOP	United Kingdom Oil Pipelines
VRA	Visual Receptor Area
WSI	Written Scheme of Investigation

References

Department for Energy Security and Net Zero (DESNZ) (2024a) Overarching National Policy Statement for Energy (EN-1).

Department for Energy Security and Net Zero (DESNZ) (2024b) National Policy Statement for Electricity Networks Infrastructure (EN-5).

Ministry of Housing, Communities and Local Government (2025) National Planning Policy Framework.

ANNEX A: Environmental Constraints Plan

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