

**The Great Grid Upgrade**

Norwich to Tilbury

# Environmental Implications of Change

Little Bromley: Change to the EACN access (Section C)

January 2026



**nationalgrid**

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# 1. Environmental Implications of Change – Little Bromley: Change to the EACN access

## 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 2. This document should be read alongside the associated Little Bromley: Change to the EACN access Consultation Leaflet.
- 1.2.2 National Grid is proposing an amendment to the Order Limits to facilitate a small modification to the route of the construction access (for use when a third-party access is not available) and a further small modification to the route for the private permanent Abnormal Indivisible Load (AIL) access route. The amendments respond to further engagement with landowners and are intended to reduce temporary and permanent implications on land uses.
- 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)<sup>1</sup> 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 1 can be found on the Project website: [nationalgrid.com/norwich-to-tilbury](https://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)

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<sup>1</sup> This EIC uses the reference numbers as set out in the Examination Library: [EN020027-000552-2 Norwich to Tilbury Examination Library PDF.pdf](https://nationalgrid.com/norwich-to-tilbury/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 Project's proposed access arrangement to the proposed EACN Substation ('Proposed Route') would use a route passing to the south of Little Bromley, Essex.

1.4.2 The strategy for access to the EACN Substation is detailed in Section 5.7.10 of the Outline CTMP (APP-309). The Proposed Route would potentially serve as access during both the construction and operational phase of the Project.

1.4.3 The proposed change would involve two modifications to the Proposed Route:

- Firstly, a section of the Proposed Route nearest to Bentley Road has been amended to provide a modified alignment for the permanent access for Abnormal Indivisible Loads (AILs) during the operational phase of the Project. The need for a permanent AIL route is to ensure that the replacement of any component, even those too heavy to otherwise get to site, can be completed at short notice. This removes the risk of delay to establish suitable arrangements at some point in the future and ensures that supplies can be maintained.
- Secondly, to the northwest of the first modification, the Proposed Route has been amended to reflect the alignment presented at statutory consultation between 10 April to 26 July 2024, for both temporary construction and permanent AIL access.

1.4.4 In both cases, the modifications respond to feedback from and ongoing detailed discussions with affected landowners in order to provide an operational access arrangement that meets the Project need whilst also facilitating ongoing land management. The first modification (the AIL route) is intended to minimise the effects of the Project on future arable cropping, while the second modification ensures that the Proposed Route more closely follows field boundaries.

1.4.5 Additionally, precautionary amendments to existing wood pole supported infrastructure would be accommodated as part of the works e.g. uplifting them.

- 1.4.6 Assumptions on the construction and operation of haul roads can be found in ES Chapter 4: Project Description (APP-130).
- 1.4.7 A figure of the Proposed Route and the proposed changes that comprise Change Request 2 are presented in the associated Little Bromley: Change to the EACN access Consultation Leaflet.

## **1.5 Environmental Implications of Change Approach and Method**

- 1.5.1 This document sets out the environmental effects that are relevant 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, the 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	The proposed change would cause minor additional disturbance to soils and agricultural land. However, 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 on agricultural land, soils and agricultural landholding 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
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	Following the implementation of mitigation measures set out in ES Chapter 8: Ecology and Biodiversity (AS-026), the Outline LEMP (AS-046) 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.
Contaminated Land, Geology and Hydrogeology	<p>The proposed change would bring the attenuation basin closer to private water supply receptors identified directly south of the Order Limits.</p> <p>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.</p>
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 proposed change would be in a similar position in relation to the grade II listed Little Bromley War Memorial as the design assessed in the ES. However, it would be slightly closer, at the northern extent, to three grade II listed buildings along Shop Road. The listed buildings along Shop Road have some screening from vegetation and other buildings, so with the nature of the construction and operation works it is not expected that this would alter the significance of effects assessed for these buildings in ES Chapter 11: Historic Environment (APP-208). Following the implementation of mitigation measures set out in ES Chapter 11: Historic Environment (APP-208) and the Outline Archaeological Mitigation Strategy and Outline WSI (APP-328), there would be no change to the type or significance of historic environment effects as a result of the proposed change, when compared to the ES.
Hydrology and Land Drainage	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.
Landscape and Visual	In the east, the proposed temporary construction access as part of the proposed change would remain the same distance from Little Bromley. The proposed change would bring the permanent EACN access road slightly closer to residential properties at the junction between Church Road and Bentley Road to the south, from approximately 170 m to approximately 100 m from the nearest property. Part of the permanent EACN access road would be slightly further from properties along Shop

Topic	Comments / observations / identified environmental implications of the proposed change when compared to the assessment presented in the ES
	<p>Road to the north, although would remain approximately 120 m from the nearest property at the entrance off Bentley Road.</p> <p>The proposed change would also move the permanent drainage feature (attenuation basin) closer to properties at the junction between Church Road and Bentley Road.</p> <p>To the west, the proposed change would bring part of the temporary and permanent access road slightly closer to properties along Shop Road, Little Bromley to the north, from approximately 250 m to approximately 200 m to the nearest property. The proposed change would be slightly closer to Essex PRoW 12 to the north, although slightly further from parts of Essex PRoWs 13 and 14 to the south.</p> <p>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), there would be no change to significance of landscape and visual effects as a result of the proposed change, when compared to the ES.</p>
Noise and Vibration	<p>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.</p>
Socio-economics, Recreation and Tourism	<p>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.</p>
Traffic and Transport	<p>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.</p>
Topics Scoped out of the ES (APP-123 to APP-287)	<p>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 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.</p>

## 1.8 Conclusion and Next Steps

- 1.8.1 This EIC is part of the consultation for Change Request 2, which National Grid is undertaking in respect of 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 1) 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

<b>AIL</b>	Abnormal Indivisible Load
<b>CoCP</b>	Code of Construction Practice
<b>CTMP</b>	Construction Traffic Management Plan
<b>DCO</b>	Development Consent Order
<b>DESNZ</b>	Department for Energy Security and Net Zero
<b>EACN</b>	East Anglia Connection Node
<b>EIA</b>	Environmental Impact Assessment
<b>EIC</b>	Environmental Implication of Change
<b>ES</b>	Environmental Statement
<b>kV</b>	kiloVolt
<b>LCA</b>	Landscape Character Area
<b>LEMP</b>	Landscape and Ecological Management Plan
<b>m</b>	metre
<b>MHCLG</b>	Ministry of Housing, Communities and Local Government
<b>NPPF</b>	National Planning Policy Framework
<b>NPS</b>	National Policy Statement
<b>PRoW</b>	Public Right of Way
<b>WSI</b>	Written Scheme of Investigation

# References

Department for Energy Security and Net Zero (DESNZ) (2025a) Overarching National Policy Statement for Energy (EN-1).

Department for Energy Security and Net Zero (DESNZ) (2025b) 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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