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1. Introduction

1.1 Overview

- 1.1.1 This draft Statement of Common Ground (SoCG) has been prepared by National Grid Electricity Transmission plc (referred to as National Grid within this document) and Historic England (HE). It identifies areas of the Norwich to Tilbury Development Consent Order (DCO) application (the Application) where matters are agreed, under discussion or not agreed between the parties.
- 1.1.2 The aim of a SoCG is to help the Examining Authority manage the examination phase of the application. Understanding the status of the matters at hand will allow the Examining Authority to focus their questioning and provide greater predictability for all participants in examination. A SoCG may be submitted prior to the start of or during examination, and then updated as necessary or as requested during the examination phase.
- 1.1.3 This SoCG is between National Grid and the Historic Buildings and Monuments Commission for England (hereafter Historic England) relating to the application for development consent for the Norwich to Tilbury ('the Project'). This SoCG has been prepared in accordance with the guidance for the examination of applications for development consent for Nationally Significant Infrastructure Projects (NSIP) (Planning Act 2008) published by the Department of Communities and Local Government (Department for Communities and Local Government, 2015).

Note: This draft SoCG has been prepared at an early phase of the DCO process, ahead of submission. It is intended to be a live and working document which will be updated as the Project progresses and shared with Historic England at key points for discussion. A final SoCG will be prepared ahead of the close of the DCO Examination. Unlike a final SoCG, this draft SoCG has not been officially signed by either party.

1.2 Project Description

- 1.2.1 The Project is a proposal by National Grid to upgrade the electricity transmission system in East Anglia between Norwich and Tilbury, comprising:
- A new 400 kilovolt (kV) electricity transmission connection of approximately 180 km overall length from Norwich Main Substation to Tilbury Substation via Bramford Substation, a new East Anglia Connection Node (EACN) Substation and a new Tilbury North Substation, including:
 - Approximately 159 km of new overhead line supported on approximately 509 pylons, either standard steel lattice pylons (approximately 50 m in height) or low height steel lattice pylons (approximately 40 m in height) and some of which would be gantries (typically up to 15 m in height) within proposed Cable Sealing End (CSE) compounds or existing or proposed substations
 - Approximately 21 km of 400 kV underground cabling, some of which would be located through the Dedham Vale National Landscape (an Area of Outstanding Natural Beauty (AONB1))

- Up to seven new CSE compounds (with permanent access) to connect the overhead lines to the underground cables
- Modification works to connect into the existing Norwich Main Substation and a substation extension at the existing Bramford Substation
- A new 400 kV substation on the Tendring Peninsula, referred to as the EACN Substation (with a new permanent access). This is proposed to be an Air Insulated Switchgear (AIS) substation
- A new 400 kV substation to the south of Orsett Golf Course in Essex, referred to as the Tilbury North Substation (with a new permanent access). This is proposed to be a Gas Insulated Switchgear (GIS) substation
- Modifications to the existing National Grid Electricity Transmission overhead lines to facilitate the connection of the existing network into the new Tilbury North Substation to provide connection to the Tilbury Substation
- Ancillary and/or temporary works associated with the construction of the Project.

1.2.2 In addition, third party utilities diversions and/or modifications would be required to facilitate the construction of the Project. There would also be land required for environmental mitigation and Biodiversity Net Gain (BNG).

1.2.3 As well as the permanent infrastructure, land would also be required temporarily for construction activities including, for example, working areas for construction equipment and machinery, site offices, welfare, storage and temporary construction access.

1.2.4 The Project would be designed, constructed and operated in accordance with applicable health and safety legislation. The Project will need to comply with design safety standards including the Security and Quality of Supply Standard (SQSS), which sets out the criteria and methodology for planning and operating the National Electricity Transmission System (NETS). This informs a suite of National Grid policies and processes, which contain details on design standards required to be met when designing, constructing and operating assets such as those proposed for the Project.

1.3 This Statement of Common Ground

1.3.1 For the purpose of this SoCG, National Grid and Historic England will jointly be referred to as the 'Parties'.

1.3.2 This SoCG is structured as follows:

- Section 1 (this section) provides an introduction to this SoCG and a description of its purpose;
- Section 2 states the role of Historic England in the application process and details engagement undertaken between National Grid and Historic England;
- Section 3 sets out cultural heritage matters discussed between National Grid and the Historic England; and
- Section 4 includes the signing off sheet

2. Record of Key Engagement

2.1 Role of the Consultee in the Process

- 2.1.1 Historic England exists to help people understand, value, care for and enjoy England's unique heritage. Historic England is a prescribed consultee for the purpose of section 42(1)(a) of the Planning Act 2008 and is named as such in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, and perform the functions set out in the National Heritage Act 1983.

2.2 Introduction

- 2.2.1 National Grid has engaged with Historic England on the Project throughout the pre-application process. This has included:
- Non-statutory consultation in Spring 2022 and Summer 2023
 - Statutory consultation in Spring 2024
 - Targeted consultations in Spring 2025
 - One to one / small group technical meetings on specific detailed matters
 - Sharing of papers and documentation at key stages
- 2.2.2 Table 2.1 summarises the consultation and engagement that has taken place between the Parties prior to submission of the application.

Table 2.1 Summary of Key Engagement between National Grid and Historic England

Date	Format/	Topic/Description
July 2022	Technical Note	NG shared document for scope and methodology for Historic Environment assessment and baseline discussion with Historic England.
July 2022	Meeting	Historic Environment Thematic Group – proposed approach for EIA assessment
September 2022	Meeting	Meeting to discuss updated approach to Study Areas, scoping of walkover and scoping of historic buildings
September 2022	Technical note/ Drawings	NG shared proposed noise and vibration scope and methodology for comment.
February 2023	Technical notes/Drawings	NG shared viewpoint location and rationale shared with stakeholder prior to landscape and heritage viewpoints discussion

Date	Format/	Topic/Description
March 2023	Meeting	Meeting to discuss landscape and heritage viewpoints
June 2023	Technical note	NG issued technical note to agree methodology for the selection of viewpoints for the Historic Environment assessment.
Summer 2023	Response to non-statutory consultation	The Consultee provided its response to the non-statutory consultation in letter format.
September 2023	Meeting	Historic Environment Thematic Group meeting – heritage viewpoint methodology
September 2023	Meeting	Discussions about approach to assessment of specific high value designated heritage assets.
October 2023	Meeting	Discussions about approach to assessment of specific high value designated heritage assets.
November 2023	Meeting	Historic Environment Thematic Group – discuss proposed locations of heritage viewpoints
November 2023	Meeting	Discussion regarding the approach to geophysical survey and trial trenching.
November 2023	Meeting	Heritage Thematic Group Meeting – viewpoint locations shared in PDF and shapefile
January 2024	Technical note/Drawings	NG shared update on cultural heritage viewpoints for feedback, including ZTV
March 2024	Technical note/Drawings	NG shared Historic Environment Desk-Based assessment for review and comment
March 2024	Meeting	Archaeology Working Group Meeting
March 2024	Technical note/Drawings	NG shared updated WSI for Geophysical Surveys for feedback
April 2024	Meeting	Meeting to discuss questions in relation to the PEIR
April 2024	Meeting	Archaeology Working Group Meeting
May 2024	Technical note/Drawings	NG shared the ZTV on request to assist with reviewing the PEIR.
May 2024	Technical note/Drawings	NG shared the WSI – Monitoring GI works under archaeological Supervision
May 2024	Meeting	Archaeology Working Group Meeting
June 2024	Technical note/Drawings	NG shared the Overarching WSI for the Archaeological Trial Trenching for review and approval

Date	Format/	Topic/Description
June 2024	Technical note/Drawings	NG shared the Site Specific WSI for the EACN (Site 001) shared for information. Report and separate plan issued.
June 2024	Meeting	Archaeology Working Group Meeting
July 2024	Meeting	Meeting to discuss the information presented with the PEIR
September 2024	Meeting	Archaeology Working Group Meeting
October 2024	Meeting	Archaeology Working Group Meeting
November 2024	Meeting	NG updated Historic England on the project and there was a discussion about the viewpoints, designation of assets and terminology used to interpret level of harm.
February 2025	Meeting	Meeting to discuss progress with actions from Meeting in November 2024
February 2025	Meeting	Meeting to discuss heritage viewpoints
February 2025	Technical note/Drawings	NG issued the second round of Heritage Viewpoints for consideration and comment.
February 2025	Meeting	Meeting to discuss heritage viewpoints in Essex
February 2025	Meeting	Follow up meeting to discuss heritage viewpoints in Essex
February 2025	Meeting	Meeting to discuss draft Historic Environment Baseline Report
March 2025	Meeting	Archaeology Working Group Meeting
April 2025	Meeting	Archaeology Working Group Meeting
May 2025	Meeting	Archaeology Working Group Meeting
May 2025	Meeting	Meeting to discuss targeted consultation responses
May 2025	Meeting	Meeting to discuss non designated assets
June 2025	Technical note	NG issued the Draft Outline Code of Construction Practice and Draft Outline Landscape and Ecological Management Plan
June 2025	Technical note	NG reissued the Outline AMS-OWSI upon request
June 2025	Meeting	Archaeology Working Group Meeting
June 2025	Technical note	NG issued Draft DCO requirements, Explanatory Memorandum and Draft Requirements

3. This Statement of Common Ground

3.1 Overview

- 3.1.1

This chapter details the matters relevant to Historic England which have been agreed, not agreed or are under discussion between the parties. Matters are arranged by topic and each matter is given a unique reference number to aid identification.
- 3.1.2

The red, amber, green status shows the level of agreement with Historic England. Descriptions of the different levels are summarised in Table 3.1.

Table 3.1 Agreement status for matters presented in Section 3

Status	Description
Not Agreed	Indicates a final position, where it has not been possible to resolve the issue to the agreement of both parties and there remains a difference of opinion.
Under Discussion	Indicates where issues are the subject of active on-going discussion.
Agreed	Indicates where an issue has been agreed or resolved satisfactorily to the agreement of both parties.

- 3.1.3

Engagement will continue as the Project develops and progresses through the various stages of the DCO process.
- 3.1.4

Sections that remain highlighted in yellow within these tables show points where both parties will seek to discuss and where possible agree a position in due course. The parties have been unable to do so at this stage because the relevant information is still being authored ahead of submission of the DCO application. These points will be the subject of ongoing discussion with stakeholders once the Environmental Statement and other relevant documentation is published.
- 3.1.5

Table 3.2 includes all matters and has columns that discuss the position and whether the matter is agreed.

3.2 Historic Environment Matters

Table 3.2 Historic Environment Matters

ID	Matter	National Grid's Position	Historic England's Position	Status
The Project				
3.2.1	Consents	In relation to the assessed effects of the project, no associated heritage consents are required in relation to Scheduled Monuments and Listed Buildings.	In relation to the assessed effects of the project, no associated heritage consents are required in relation to Scheduled Monuments and Listed Buildings.	Agreed
Historic Environment				
3.2.2	ES – Regulatory, Planning Policy Context and Guidance - Policy and Legislation	The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) and Section 11.2 of Chapter 11 (Historic Environment) of the ES. All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.	HE position pending site of ES.	Under discussion
3.2.3	ES – Approach and Methods - Study area and baseline information	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. Comments from HE consultation response dated Summer 2024: While HE accept a 3 km study area, it might be valuable to review the grade II buildings to 3 km to ensure that where the wider setting	Under discussion

ID	Matter	National Grid's Position	Historic England's Position	Status
			contributes to their special architectural and historic interest, and to their significance, due consideration has been given.	
3.2.4	ES – Approach and Methods - Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 of Chapter 11 (Historic Environment) of the ES.	HE position pending site of ES.	Under discussion
3.2.5	ES – Approach and Methods - Assessment methodology	The methodology for assessing Historic Environment was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate	<p>Comments from HE consultation response in Summer 2024:</p> <ul style="list-style-type: none"> HE noted they are broadly content with the methodology and approach set out in the PEIR and the first indications of its application which can be seen in the Baseline Report. Crucial to evidencing the potential visual impacts on designated heritage assets during the forthcoming assessment process will be the production of wireline images of the landscape incorporating the proposed pylons and associated structures. 	Agreed
3.2.6	ES – Approach and Methods - Individual Heritage Assets - Scope of Assessment	A phased approach to assessment of listed buildings has been implemented to most effectively focus ES assessment on likely significant effects. NG have provided details on 'scoping out' the listed buildings in Appendix 11.1 Historic Environment Baseline Report Annex E Scoped out listed buildings (Document Reference 6.11.A1).	<p>Historic England agree with the reason for 'scoping out' the listed buildings included in Appendix 11.1 Historic Environment Baseline Report Annex E Scoped out listed buildings (Document Reference 6.11.A1)</p> <p>Comments from HE consultation response in Summer 2024:</p> <ul style="list-style-type: none"> HE are generally content with the approach to the Setting Survey in the PEIR (see 11.5.16-24) and have considered individual buildings as 	Under discussion

ID	Matter	National Grid's Position	Historic England's Position	Status
			assessed in the Baseline Report on the merits of that assessment. We would agree with grouping buildings within settlements, assuming that settlement is an asset (i.e. a conservation area) and so benefits from assessment in its own right. HE position pending site of ES.	
3.2.7	ES – Approach and Methods - Key parameters and assumptions	Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of Chapter 11 (Historic Environment) of the ES . The key parameters and assumptions presented are considered appropriate.	HE position pending sight of ES.	Under discussion
3.2.8	ES – Baseline Conditions - Baseline conditions and receptors	The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of Chapter 11 (Historic Environment) of the ES and Appendix 11.1 Historic Environment Baseline Report . The baseline conditions and receptors presented are considered appropriate.	HE position pending sight of ES.	Under discussion
3.2.9	ES – Embedded, Standard and Additional Mitigation Measures - Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Historic Environment effects, are set out in Section 11.6 of Chapter 11 (Historic Environment) of the ES . Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	No comments received on AMS/OWSI	Under discussion

ID	Matter	National Grid's Position	Historic England's Position	Status
		NG shared Archaeological Mitigation Strategy and Outline Written Scheme of Investigation in April 2025 for comment.		
3.2.10	ES – Embedded, Standard and Additional Mitigation Measures - Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of Chapter 11 (Historic Environment) of the ES and set out in the Outline CoCP (document reference 7.2). The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	No comments received on AMS/OWSI	Under discussion
3.2.11	ES – Embedded, Standard and Additional Mitigation Measures - Additional mitigation	The consideration of additional mitigation measures are presented in Section 11.6 of Chapter 11 (Historic Environment) of the ES and the Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (document reference 7.5) . Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	No comments received on AMS/OWSI	Under discussion
3.2.12	ES – Assessment Conclusions - Construction effects	The assessment of effects during construction is presented in Section 11.7 of Chapter 11 (Historic Environment) of the ES . The assessment of effects during construction presented is considered appropriate.	HE position pending sight of ES.	Under discussion

ID	Matter	National Grid's Position	Historic England's Position	Status
3.2.13	ES – Assessment Conclusions - Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of Chapter 11 (Historic Environment) of the ES . The assessment of effects during operation (and maintenance) presented is considered appropriate.	HE position pending sight of ES.	Under discussion
3.2.14	ES – Assessment Terminology – Approach to EIA and policy terminology	The assessment of effects presented in Section 11.7 of Chapter 11 (Historic Environment) of the ES principally uses EIA terminology to describe effects. The assessment presented in Appendix 11.2 Historic Environment Assessment tables also includes the assessment of impact presented in terms of 'harm', as per NPS (EN-1) and this is considered appropriate. As discussed in the meeting on 8 th November 2024, Historic England agree that the Project would not result in 'Substantial Harm' as defined in The Planning Practice Guidance: Historic Environment Paragraph: 018 Reference ID: 18a-018-20190723	As discussed in the meeting on 8th November 2024, Historic England agree that the Project would not result in 'Substantial Harm' as defined in The Planning Practice Guidance: Historic Environment Paragraph: 018 Reference ID: 18a-018-20190723. HE position pending site of ES Appendix 11.7 - Assessment of Harm to Designated Heritage Assets (Doc Ref. 6.11.A7).	Under discussion
3.2.15	Draft DCO / Outline Management Plans / Mitigation and Monitoring – Outline CoCP	The Outline CoCP includes relevant construction mitigation measures specified in Chapter 11 (Historic Environment) of the ES and is appropriate for managing construction impacts from the Project. The Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (document reference	HE have not provided any comments on the oCoCP and oLEMP on the most recent iteration of the documents. HE have not responded to the Draft DCO requirements, Explanatory Memorandum and Draft Requirements.	Under discussion

ID	Matter	National Grid's Position	Historic England's Position	Status
		<p>7.5) presents appropriate additional mitigation measures and is secured through relevant Requirements of the Draft DCO, the content and approach is considered appropriate and adequate for managing construction impacts from the Project.</p> <p>NG shared the draft Outline oCoCP and oLEMP shared with HE on 12th June 2025 for comment.</p> <p>NG issued Draft DCO requirements, Explanatory Memorandum and Draft Requirements in June 2025.</p>		
Other Matters				
3.2.16	Overarching Written Schemes of Investigations (WSIs) for pre- consent geophysical surveys and archaeological trial trenching.	<p>National Grid shared the overarching WSIs in March – June 2024 and December 2024.</p> <p>NG noted feedback received from HE and incorporated feedback into the overarching WSI where applicable.</p> <p>The scope and methodology of WSIs for geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of impact anticipated.</p>	<p>HE Science Advisor provided comments on the Overarching WSI in Summer 2024 for consideration.</p> <p>The scope and methodology of WSIs for geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of impact anticipated.</p>	Under discussion
3.2.17	Site specific Written Scheme of Investigations (WSIs) for pre-consent geophysical surveys	The scope and methodology of WSIs for geophysical surveys and archaeological trial trenching is considered appropriate and	There are still site specific WSI's forthcoming that have yet to be issued, however the responsibility of the site specific WSIs lies with the local authority archaeological advisors to approve.	Under discussion

ID	Matter	National Grid's Position	Historic England's Position	Status
	and archaeological trial trenching.	<p>proportionate to the level of impact anticipated.</p> <p>There are still site specific WSIs forthcoming that have yet to be issued. While NG anticipate issuing any forthcoming Site Specific WSI to HE, sharing would be for information purposes and would not require HE to provide a formal response.</p>		
3.2.18	Programme for completion of archaeological fieldwork	<p>A phased approach to archaeological evaluation is being undertaken. The project has defined "priority areas" on the basis of the likely scale of impact on archaeological remains, flexibility in design and construction programme. A proportion of the evaluation of "priority areas" will be complete at submission with the rest completed pre examination. Evaluation of "non priority areas" is proposed to be undertaken following completion of "priority areas".</p> <p>The programme for archaeological fieldwork is considered appropriate and proportionate to the level of impact anticipated.</p>	It is expected that the programme for archaeological fieldwork at the time of submission is considered appropriate and proportionate by Historic England.	Under discussion
3.2.19	Outline Mitigation Strategy and Outline WSI.	<p>The contents of the Draft Mitigation Strategy and Outline WSI is considered appropriate and proportionate to the level of impact anticipated.</p> <p>National Grid issued the Draft Outline Mitigation Strategy and draft Outline Written Scheme of Investigation (WSI)</p>	It is expected that the Outline Mitigation Strategy and Outline WSI at the time of submission is considered appropriate and proportionate by Historic England.	Under discussion

ID	Matter	National Grid's Position	Historic England's Position	Status
		for post-consent stage of the project in April 2025.		
3.2.20	Programme for completion of archaeological fieldwork	The programme for archaeological fieldwork is considered appropriate and proportionate to the level of impact anticipated.	HE position pending sight of full programme.	Under discussion
3.2.21	Historic Environment Viewpoints	NG have agreed location of viewpoints and types of visualisations to be produced.	The viewpoints have been agreed in thematic group meetings held between February 2023 and May 2025.	Under discussion

4. Confirmation of Agreement

The above SoCG is agreed between National Grid and Historic England on the date specified below.

Signed for and on behalf of National Grid:

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Date:

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Signed for and on behalf of Historic England:

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Date:

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Abbreviations

Abbreviation	Full Reference
AMS	Archaeological Mitigation Strategy
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
GW	Gigawatts
HE	Historic England
NETS	National Electricity Transmission System
NG	National Grid
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
oCoCP	Outline Code of Construction Practice
OLEMP	Outline Landscape and Ecological Management Plan
(O)WSI	(Outline) Written Scheme of Investigation
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground

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