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Norwich to Tilbury

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Wildlife Trust - Letter

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nationalgrid

Norfolk Wildlife Trust Stakeholder Agreement Norwich to Tilbury Statement of Common Ground

1. Purpose of the Statement of Common Ground

This Statement of Common Ground (SoCG) has been prepared to outline the areas of agreement and any remaining points of discussion between National Grid (NG) and Norfolk Wildlife Trust regarding potential ecological impacts in relation to the proposed Norwich to Tilbury Project (the Project).

The aim is to clarify the shared understanding of any issues and facilitate an efficient resolution process.

2. Parties to the SoCG

This SoCG has been developed between National Grid and the Norfolk Wildlife Trust (NWT).

3. Background

3.1 Description of the Project/Development

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.

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).

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.

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.

The Project is a Nationally Significant Infrastructure Project (NSIP) and as such will require the grant of development consent by the making of a Development Consent Order (DCO) under the Planning Act 2008. The Act places duties on National Grid as the DCO applicant to consult with prescribed or affected persons as well as to take account of responses to consultation and publicity. In accordance with these statutory requirements, National Grid has undertaken two non-statutory consultations and one statutory consultation to inform its proposals, with further recent targeted consultations.

4. Stakeholder Interests

Norfolk Wildlife Trust support the transition to renewable energy to mitigate the worst impacts of climate change. NWT understand that additional electricity transmission infrastructure is needed to facilitate the shift towards a decarbonised energy sector, however it is essential that this shift is not at the expense of wildlife, which faces an intrinsically linked and equally serious crisis. The Trust therefore support a coordinated strategic approach to the planning, design and construction of new energy infrastructure to reduce the overall negative impacts from schemes

on nature and maximise potential for habitat creation and restoration to deliver environment, social and economic benefits.

Norfolk Wildlife Trust may also raise concerns or comments on additional matters pertaining to biodiversity conservation within the DCO application following sight of the Environmental Statement and throughout the process of the developing this document.

The chronology of National Grid's engagement with Norfolk Wildlife Trust to date, and the evolution of the Project's design is summarised as follows:

- 2022
 - National Grid presented information on how the Project was evolving from the evaluation of strategic options to a preliminary preferred graduated swathe within which new infrastructure (pylons and underground cables) could be located as well as a proposed new substation site on the Tendring Peninsula, as described within the [Corridor and Preliminary Routeing and Siting Study Report](#) (April 2022)
 - 21 April – 16 June non-statutory consultation. Norfolk Wildlife Trust comments included matters relating to the route selection process and a lack of appraisal of impacts on County Wildlife Sites, and Biodiversity Net Gain.
- 2023
 - Development of the 2023 Preferred Draft Alignment, responding to feedback and other studies, as described within the [Design Development Report \(June 2023\)](#)
 - 27 June – 21 August non-statutory consultation on the 2023 Preferred Draft Alignment. Norfolk Wildlife Trust comments included matters relating to impacts to the River Waveney crossing and the WaLOR project, as well as additional Biodiversity Net Gain comments.
 - September - Meeting to discuss Biodiversity Net Gain – potential off-site scheme/initiatives
- 2024
 - Development of the 2024 Preferred Draft Alignment, responding to feedback and other studies, as described within the [Design Development Report \(April 2024\)](#) and [Preliminary Environmental Information Report \(PEIR\)](#) (April 2024)
 - 10 April – 26 July Statutory Consultation on the 2024 Preferred Draft Alignment: Norfolk Wildlife Trust comments included the River Waveney crossing and impacts to the WaLOR project, with additional comments on protected species, protected sites (notably Flordon Common Site of Special Scientific Interest (SSSI)), Roydon Fen LNR/CWS, and Brick Kiln Lane CWS), Biodiversity Net Gain, and more general biodiversity considerations.
- 2025
 - Development of the proposed Project Alignment prior to DCO submission, considering feedback and other studies
 - 19 May – Meeting to discuss BNG and tree planting opportunities

- 19 June – Meeting to discuss BNG and tree planting opportunities
- 14 July 2025- Meeting to discuss the SoCG with Essex Wildlife Trust, Suffolk Wildlife Trust and Norfolk Wildlife Trust.

5. Matters Agreed

Issue	Agreement reached	Date agreed	Relevant documentation
Waveney Valley Alternative	National Grid have concluded, based on its own technical assessments, that an undergrounding option that <i>a) avoids the need for open trenching through parts of the floodplain that contain peat soils that are the focus of floodplain habitat restoration proposals</i> and <i>b) achieves sufficient buried cable depth to prevent potential issues for proposed stage zero river restoration and restoration of floodplain wetland habitats</i> is not achievable. NWT agree that in these circumstances an undergrounding option through the Waveney Valley in the proposed location would not be compatible with the WaLOR Project.	24 April 2025	N/A

6. Matters currently under discussion

Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
WaLOR Project	NWT expect evidence in the ES to demonstrate that the Norwich to Tilbury Project (with an overhead line through the Waveney Valley) and the WaLOR Project are compatible with each other and that the Project would not significantly impact on the WaLOR planned river restoration and habitat creation activities.	NG will continue to engage with NWT on this issue, with further information being available in the ES following its completion.	N/A
County Wildlife Sites (CWSs) in Norfolk	NWT expect evidence in the ES to demonstrate how the Norwich to Tilbury Project has avoided and minimised impacts on CWSs in Norfolk where possible and have detailed appropriate mitigation to ensure no long-term residual effects.	NG will continue to engage with NWT on this issue, with further information being available in the ES following its completion.	N/A
Licensable Species and Designated Sites	NWT may wish to comment and engage in discussion with the applicant and Natural England on matters relating to licensable species (e.g. European Protected Species and species listed in Annex 1 of the Wildlife & Countryside Act) and designated sites, in addition to priority species and species of conservation concern.	NG will continue to engage with NWT on this issue, with further information being available in the ES following its completion.	N/A
BNG Offsite Solutions	National Grid have been engaging in productive discussions with NWT regarding the provision of offsite Biodiversity Net Gain units for the Project. National Grid are continuing these discussions with NWT regarding securing the offsite units.	National Grid have been engaging in productive discussions with NWT regarding the provision of offsite Biodiversity Net Gain units for the Project. National Grid are continuing	N/A

Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
		these discussions with NWT regarding securing the offsite units.	
Peat soils	<p>Comments provided in response to the Statutory Consultation in July 2024:</p> <p>Detailed mapping of peat soils within the river valley and robust and evidence-based proposals for compensating for any unavoidable loss of peat should be provided.</p>	NG conducted more detailed peat surveys in the Waveney Valley in late 2024 and determined that organic-rich (peaty) soils were present. Additional mitigation measures for the handling of organic-rich soils have been included in the Outline Soil Resource Plan.	Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (document reference 7.2)
Impacts on designated sites in Norfolk	<p>Comments provided in response to the Statutory Consultation in July 2024:</p> <ul style="list-style-type: none"> The Trust note that the proposed route crosses close to Flordon Common SSSI, a component of the Norfolk Valley Fens Special Area of Conservation (SAC). The SSSI and its designated features should not be impacted by the proposed works and the proposal should be able to clearly demonstrate that any adverse effects on the SAC are avoided. A robust assessment of the impacts of the route on hydrology, where indirect impacts have the potential to interfere with ground water flows and local hydrology, is required. Confirmation that no vegetation clearance within Roydon Fen is required. More information is required as to the potential effects of the Norwich to Tilbury 	<p>Through the consideration of consultation feedback such as that provided by NWT and ongoing environmental and engineering studies, the Norwich to Tilbury Project has reduced impacts on CWS in Norfolk as well as SACs and SSSIs where possible and have detailed appropriate mitigation to ensure no long-term residual effects.</p> <p>NG note that the Habitats Regulation Assessment (HRA) assesses potential impact pathways. Details of the HRA can be found in the Habitat Regulations Assessment Report. NG have consulted with Natural England on the</p>	<p>5.3 Habitat Regulation Assessment Report (document reference 5.3).</p> <p>Section 6 Mitigation Measures, Environmental Commitments and Monitoring of the Outline Code of Construction Practice (document reference 7.2).</p>

Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
	<p>scheme including the potential for measures to reduce river water influxes in the future to safeguard Roydon Fen's sensitive habitats.</p> <ul style="list-style-type: none"> The Trust notes that proposed pylon route includes a section of Brick Kiln Lane CWS within the scope of works and several other CWSs are identified as having potential indirect impacts from construction pollution. Mitigation for these impacts will be required as there should be no detrimental effect to these sites and their designated features. 	<p>HRA Report, and they are in agreement with the approach and conclusions reached.</p> <p>NG note there is no vegetation clearance proposed within Roydon Fen.</p> <p>Further details on construction impacts to water environments can be found in Section 6 Mitigation Measures, Environmental Commitments and Monitoring of the Outline Code of Construction Practice.</p>	
Biodiversity Net Gain (BNG)	<p>Comments provided in response to the Statutory Consultation in July 2024:</p> <ul style="list-style-type: none"> The project should seek to support landscape scale habitat creation and enhancement to deliver habitat connectivity, creating new and linking existing habitat. The trust wish to repeat the recommendations made in our previous responses in 2022 and 2023 that the scheme, if consented, should deliver 20% biodiversity net gain, given the scale of the biodiversity crisis we face and the need to move quickly towards nature's recovery. Any habitat creation or restoration included as part of the proposal should maximise its contribution towards 	<p>National Grid will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. Offsite BNG will be delivered through collaboration with partners and purchased from commercially registered providers. National Grid has been engaging in productive discussions with Norfolk, Suffolk and Essex Wildlife Trusts regarding the provision of off-site BNG units for the Project.</p>	Biodiversity Net Gain Report (document reference 7.1).

Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
	<p>the restoration of ecological connectivity and delivery of the emerging Nature Recovery Network. The Trust welcome the statement that the project would seek to provide strategic habitat enhancement and creation, aiming to identify and implement opportunities to improve habitat quality and connectivity and align with national nature recovery objectives and projects.</p> <ul style="list-style-type: none"> As well as a net gain across the project, offsetting should be delivered throughout Norfolk, Suffolk, and Essex. This will ensure that nature recovery is supported at a landscape scale across all three counties in which the project is proposed. 	<p>National Grid will consider provision of BNG within areas identified in Local Nature Recovery Strategy (LNRS) areas where sites are available and are appropriate to project circumstances.</p> <p>NG are continuing to work with representatives at Essex, Norfolk and Suffolk Wildlife Trusts regarding BNG and off-site requirements. Biodiversity is not physically bound by each Local Planning Authority boundary, however, the aim is to deliver a biodiversity legacy in each of the three counties the Project crosses (Norfolk, Suffolk and Essex).</p>	
Impacts on protected species	<p>Comments provided in response to the Statutory Consultation in July 2024:</p> <ul style="list-style-type: none"> The ES will need to demonstrate that there are no adverse impacts on bats, and the Trust recommend that construction phase impacts on connectivity between roosts and foraging areas is robustly considered. Similarly, for otter and water vole, results of the surveys are to be presented in the ES and it must be shown that there are no adverse impacts on these species. 	<p>NG note that the findings are included within the appendices to Environmental Statement Chapter 8: Ecology and Biodiversity. Details associated with mitigation for protected species can be found in section 6.1 Protected Species Mitigation of the Outline Landscape and Ecology Management Plan.</p>	<p>Section 6.1 Protected Species Mitigation of the Outline Landscape and Ecology Management Plan (document reference 7.4).</p> <p>Environmental Statement Chapter 8:</p>

Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
	<ul style="list-style-type: none"> We recommend that a robust assessment of the indirect impacts of the route on the wider landscape should also be carried out to include impacts on habitat connectivity, farmland birds, in particular any populations of turtle dove, a species at risk of being lost from the UK, but which still occurs in south Norfolk. 		Ecology and Biodiversity.
Hedgerow Loss	<p>Comments provided in response to the Statutory Consultation in July 2024:</p> <p>Where hedgerow removal is required, proposed mitigation should include improving the standard and design of hedgerow mitigation work, to include using species of local provenance, double planting and a long-term management plan.</p>	<p>NG will continue to engage with NWT on this issue, with further information being available in the ES following its completion.</p>	N/A
Collision Risk Modelling	<p>Comments provided in response to the Statutory Consultation in July 2024:</p> <p>Appendix 8.5 details the results of wintering and passage bird surveys. It lists a number of 'Collision Risk Species' and provides information on numbers of individuals present. However, there is no interpretation of these data or any collision risk modelling to provide information on the actual likelihood of collision. We request that this information is provided.</p>	<p>NG will continue to engage with NWT on this issue, with further information being available in the ES following its completion.</p>	N/A

7. Signatures

This Statement of Common Ground is agreed upon by the undersigned parties:

For National Grid

Name: _____

Position: _____

Date: _____

For Norfolk Wildlife Trust

Name: _____

Position: _____

Date: _____

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