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# Norwich to Tilbury

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Wildlife Trust - Letter

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**nationalgrid**

# **Suffolk 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 and Suffolk Wildlife Trust (SWT) 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 is agreed between National Grid and the Suffolk Wildlife Trust (the Stakeholder).

### **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**

Suffolk Wildlife Trust supports the transition to renewable energy to mitigate the worst impacts of climate change, which threatens wildlife as well as people. It is vital though that new electricity transmission infrastructure to facilitate the decarbonisation of the energy sector does not compromise society's ability to address the equally important crisis of biodiversity loss or

undermine the delivery of nature-based solutions to climate change. For Norwich to Tilbury this means in particular that:

- The crossing of the River Waveney Valley must not compromise the ability of the Waveney and Little Ouse Landscape Recovery (WaLOR) project to deliver its planned nature recovery activities.
- Potential for significant impacts to important species within Dedham Vale National Landscape (notably hazel dormice and bats) must be adequately assessed and likely impacts avoided, mitigated, and compensated for in line with the mitigation hierarchy and following best practice to ensure no residual adverse impact and ideally provide significant net benefits to the species locally.

Suffolk Wildlife Trust's interests also include;

- Wider impacts as a result of hedgerow/ scrub/ woodland loss which could affect hazel dormice, bats (especially barbastelle), and farmland birds even if considered temporary,
- Impacts to several County Wildlife Sites, and the Rivers Gipping and Stour,
- Bird collision risk modelling.

Suffolk 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 Suffolk 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: Suffolk Wildlife Trust comments included matters relating to the route selection process, protected sites in the Waveney Valley, bird collision risk, County Wildlife Sites, Priority Habitats, Network Expansion Zones, undergrounding impacts in Dedham Vale National Landscape, 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: Suffolk Wildlife Trust comments included matters relating to impacts to the WaLOR project, Dedham Vale National Landscape, and the River Gipping CWS and Sproughton Park CWS, as well as additional Biodiversity Net Gain comments.
  - August - 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: Suffolk Wildlife Trust comments included the River Waveney crossing and impacts to the WaLOR project, with additional comments on protected species, protected sites, the crossing of the Dedham Vale National Landscape, Biodiversity Net Gain, and more general biodiversity considerations.
- 17 March meeting between National Grid and Suffolk Wildlife Trust to discuss the Waveney and Little Ouse Landscape (WALOR) Recovery project area
- 11 November meeting between National Grid and Suffolk Wildlife Trust to discuss BNG-related matters

- 2025

- Development of the proposed Project Alignment prior to DCO submission, considering feedback and other studies
- 30 January - 3 March Consultation for Suffolk on proposed changes to the underground cable alignment: Suffolk Wildlife Trust comments included the Waveney crossing pylon location and the proposed undergrounding of an existing overhead lines (OHL) at Thrandeston Marsh CWS.
- 11 March - Meeting to discuss BNG and WaLOR project in relation to the Project
- 24 April - Meeting between National Grid and Suffolk Wildlife Trust and WALOR to discuss offsite BNG and tree planting
- 10 July - Meeting between National Grid and Suffolk Wildlife Trust and WALOR to discuss offsite BNG
- 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 and 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. SWT agree that in these circumstances an undergrounding option through the Waveney Valley in the proposed location would not be compatible with the WaLOR Project.	24/04/2025	N/A

## 6. Matters Currently Under Discussion

Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
WaLOR Project	SWT 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	NG will continue to engage with SWT on this issue, with further information being available in the ES following its completion.	

Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
	planned river restoration and habitat creation activities.		
County Wildlife Sites (CWSs) in Suffolk	SWT expect evidence in the ES to demonstrate how the Norwich to Tilbury Project has avoided and minimised impacts on CWSs in Suffolk where possible and have detailed appropriate mitigation to ensure no long-term residual effects. CWSs in proximity to the Project include Roydon Fen and Mellis Common, with Bonny Wood slightly more distant at just over 500 m from the red line boundary.	NG will continue to engage with SWT on this issue, with further information being available in the ES following its completion. Details associated with mitigation for designated sites can be found in section 6.1 Protected Species Mitigation of the Outline Landscape and Ecology Management Plan.	Outline Landscape and Ecology Management Plan (document reference 7.4). Environmental Statement Chapter 8: Ecology and Biodiversity.
Licensable Species and Designated Sites	SWT 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 SWT on this issue.	N/A
BNG Offsite Solutions	National Grid have been engaging in productive discussions with SWT regarding the provision of offsite Biodiversity Net Gain units for the Project. National Grid are continuing	National Grid have been engaging in productive discussions with SWT regarding the provision of offsite Biodiversity Net Gain units for the Project. National Grid are continuing	N/A

Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
	these discussions with SWT regarding securing the offsite units.	these discussions with SWT regarding securing the offsite units.	
Peat soils	<p>Comments provided in response to the Statutory Consultation in July 2024:</p> <ul style="list-style-type: none"> <li>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.</li> </ul>	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)
Waveney Valley - vegetation clearance	<p>Comments provided in response to the Statutory Consultation in July 2024:</p> <ul style="list-style-type: none"> <li>The Trust seek written clarification on the extent and nature of vegetation clearance required within and either side of the working width for the construction of the Waveney Valley crossing section of the scheme and extend this to within all areas in the WaLOR Project outside the floodplain where scrub and transitional woodland habitats are proposed.</li> </ul>	NG note that the full 100 m width includes the limit of deviation for the overhead route and therefore vegetation within the full extent of the 100 m swathe would not be removed in its entirety. NG will seek to reduce the vegetation impact at detailed design.	N/A



Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
Biodiversity Net Gain (BNG)	<p>Comments provided in response to the Statutory Consultation in July 2024:</p> <ul style="list-style-type: none"><li>• The Trust encourage National Grid to go beyond the 10% commitment and deliver at least 20% net gain across hedgerows and watercourses as well as the area habitats already considered.</li><li>• The Trust note that in addition to net gain across the project, offsetting should be delivered throughout Norfolk, Suffolk, and Essex to ensure that nature recovery is supported at a landscape scale across all three counties in which the project is proposed.</li></ul>	<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>	<p>Biodiversity Net Gain Report (document reference 7.1)</p>
WaLOR Project and Biodiversity Net Gain (BNG)	<p>Comments provided in response to the Statutory Consultation in July 2024:</p> <ul style="list-style-type: none"><li>• The Trust has concerns regarding the effects of both the proposed pylon route and the Waveney Valley Alternative on habitat creation and natural riverine and flood plain processes. The creation of Biodiversity Units through habitat creation and enhancement is central to the viability of the WaLOR project</li></ul>	<p>Conversations with SWT are ongoing regarding the WaLOR Project and BNG. All habitats within the Order Limits are considered as part of the BNG metric with the Project committing to deliver at least 10% BNG with wider environmental and societal benefits. Post-development habitats would ensure all trading rules are satisfied.</p>	<p>Biodiversity Net Gain Report (document reference 7.1)</p>

Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
	<p>and the Trust seek reassurances that we will be consulted regarding how the BNG assessment for the scheme is undertaken at the River Waveney crossing.</p> <ul style="list-style-type: none"> <li>The Trust welcome a comparison of Metric calculations for crossing options for the Waveney Valley, which should consider the current baseline and baseline at time of construction should habitat changes as part of the WaLOR project taking place prior to works.</li> <li>Further clarification is needed on how the project BNG Assessment and the Habitat Units created within the Red Line boundary as part of the WaLOR project will interact</li> </ul>		
County Wildlife Sites	<p>Comments provided in response to the Statutory Consultation in November 2024:</p> <ul style="list-style-type: none"> <li>The Trust has concerns regarding potential impacts to some County Wildlife Sites which lie within the Draft Order Limits; these include, but are not limited to, the direct and indirect impacts to Sproughton Park,</li> </ul>	<p>Through the consideration of consultation feedback such as that provided by SWT and ongoing environmental and engineering studies, the Norwich to Tilbury Project has reduced impacts on CWSs where possible and have detailed appropriate mitigation to ensure no long-term residual effects.</p>	<p>Chapter 8 (Ecology and Biodiversity) of the ES (Document reference 6.8)</p>

Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
	<p>River Gipping (Sections), River Waveney (Sections), Fore and Bushy Groves, Great Newton Wood, Round Wood and Elms grove, and Millers Wood CWSs as well as Roadside Nature Reserve 200.</p> <ul style="list-style-type: none"> <li>The Trust note Pylon JC015 lies wholly within Sproughton Park CWS; this pylon should be moved north to avoid this impact, or clear reasons why it must be located within the CWS provided.</li> </ul>		
Thrandeston Marsh	SWT has expressed concerns regarding the impact on Thrandeston Marsh of proposed undergrounding of existing 132 kV overhead line through the County Wildlife Site.	Any impacts on Thrandeston Marsh would be assessed as part of Chapter 8 (Ecology and Biodiversity) of the ES. With appropriate mitigation measures in place, NG do not anticipate any long-term residual effects.	Chapter 8 (Ecology and Biodiversity) of the ES Document reference 6.8).
Air Quality	<p>Comments provided in response to the Statutory Consultation in July 2024:</p> <ul style="list-style-type: none"> <li>At receptor ER_17, there is an increase in Nitrogen deposition, with the impact being less than 1% of the relevant lower critical load and therefore considered to be not significant. The Trust urge caution in this assessment and seek clarity that</li> </ul>	NG note that a construction dust assessment and an assessment of construction traffic emissions is presented in the ES, to determine any changes in air quality arising from construction phase. The ES also recommends good practice to mitigate the impact of the Project on air quality. The ES clarifies the approach to	Environmental Statement Chapter 7: Air Quality (document reference 6.7).

Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
	in-combination impacts from any other projects assessed as being impacts.	assessing in combination / cumulative effects.	
Mitigation Hierarchy	<p>Comments provided in response to the Statutory Consultation in July 2024:</p> <ul style="list-style-type: none"> <li>The Trust re-iterate BMSDC comments and seek reassurance that the mitigation hierarchy will be rigorously applied to avoid impacts before the consideration of mitigation and compensation.</li> </ul>	<p>The mitigation hierarchy has been considered in Section 8.6 of Environmental Statement Chapter 8: Ecology and Biodiversity.</p> <p>The Project has considered opportunities to enhance ecosystem services and natural capital within the design following the mitigation hierarchy to avoid and minimise effects to biodiversity receptors. Where effects to biodiversity receptors are unavoidable, the design incorporates appropriate mitigation and/or compensation measures. The Project assesses effects on the biodiversity receptors within the ES (Volume 6 of the DCO application) and includes justification of any residual effects.</p>	Environmental Statement Chapter 8: Ecology and Biodiversity (document reference 6.8) – Section 8.6.
Hedgerow Loss	Concern regarding direct habitat loss and temporary loss of connectivity. Impacts to farmland birds (loss of foraging and nesting habitat), hazel dormice (loss of habitat), and bats (esp. barbastelle) (loss of connecting habitat).	NG will continue to engage with SWT on this issue, with further information being available in the ES following its completion.	

Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
	<p>Additionally, we note that defining this loss of connectivity as temporary fails to consider that the typical time for re-establishment is 4-5 years, the average lifespan of a hazel dormice. The time taken for a replanted hedgerow to achieve equivalent ecological value to a removed ancient or long-existing hedgerow could be significantly longer than this.</p>		
Dedham Vale National Landscape	<p>An important area for wildlife including hazel dormice and bats. The proposed change from Overhead Line (OHL) to underground occurs near to Raydon Great Wood and a linear belt of habitat both of which are suitable habitat for dormice.</p> <p>The use of trenching and Horizontal Directional Drilling (HDD) in Dedham Vale National Landscape will see increased hedgerow losses – issue covered above.</p>	<p>NG will continue to engage with SWT on this issue, with further information being available in the ES following its completion.</p>	



## 7. Signatures

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

For National Grid

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

For Suffolk Wildlife Trust

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

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