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Norwich to Tilbury

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Wildlife Trust - Letter

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nationalgrid

Essex 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 Essex 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 is agreed between National Grid and the Essex Wildlife Trust (EWT).

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

Essex Wildlife Trust supports the transition to renewable energy to mitigate the worst impacts of climate change. There is an understanding 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 and biodiversity, 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.

The Trust would like more detail from National Grid regarding how impacts will be mitigated through design and during the construction and operational phases, as well as information about potential limitations the scheme might place on habitat restoration and management activities in the vicinity of the overhead lines and pylons. Given the nature of the impacts, The Trust also expect to see evidence that the mitigation hierarchy has been followed and measures to avoid ecological impacts have been considered

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.

Essex 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 Local Wildlife Sites
- bird collision risk modelling

echo the concerns of Suffolk Wildlife Trust regarding potentially significant impacts at a population level on hazel dormice in Dedham Vale National Landscape.

- Concerns include significant habitat loss, including the removal of a considerable number of trees, at Springfield Farm, north of Black Brook in Section C
- Habitat losses impacting a number of non-statutory Local Wildlife Sites (LoWS) in Essex, including areas of ancient woodland
- Impacts on hazel dormice, bats and birds

Essex 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 Essex 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

- 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
 - 9 August 2023 – Meeting to discuss BNG opportunities
- 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
 - 26 July 2024 – Received statutory consultation response from EWT
 - 10 October 2024 – Meeting to discuss BNG opportunities
- 2025
 - Development of the proposed Project Alignment prior to DCO submission, considering feedback and further engineering and environmental studies
 - 30 January – 17 April Targeted Consultations on proposed changes to the 2024 Preferred Draft Alignment
 - 24 April 2025 – Meeting to discuss BNG and tree planting opportunities
 - 19 June 2025 – 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	Essex Wildlife Trust position (including date)	National Grid position (including date)	Agreement Reached (including date)	Relevant documentation
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5.1 Matters currently under discussion

Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
General	<p>Comments provided in response to the Statutory Consultation in July 2024:</p> <p>The Trust have identified the following concerns and issues to address:</p> <ul style="list-style-type: none"> Impacts of undergrounding cables where route passes through Dedham Vale National Landscape – impact on hedgerows and time lag between replacing hedgerows and achieving connectivity and equal ecological value. Significant habitat loss, including the removal of a considerable number of trees, at Springfield Farm, north of Black Brook in Section C 	<p>Through the consideration of consultation feedback such as that provided by EWT and ongoing environmental and engineering studies, the Norwich to Tilbury Project has minimised impacts on wildlife sites where possible and have detailed appropriate mitigation to ensure no long-term residual effects.</p> <p>Impacts to trees has been considered by the design team and a full impact assessment for biodiversity receptors will be included within the Environmental Statement.</p> <p>Mitigation for impacts on wildlife sites can be found in <i>Section 9 Landscape and Ecological Reinstatement and Mitigation</i> of the Outline Landscape Ecological Management Plan.</p>	<p>Appendix E Ancient Woodland and Veteran Tree Strategy of Outline Landscape and Ecological Management Plan (document reference 7.4)</p> <p>Appendix 13.4: Arboricultural Impact Assessment (document reference</p>

Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
	<ul style="list-style-type: none"> Habitat losses impacting a number of non-statutory LoWS in Essex, including areas of ancient woodland Impacts on hazel dormice, bats and birds- both with overhead collisions and undergrounding impact on hedgerows Impact on Tilbury -impact on Tilbury from other developments and the cumulative net loss. 	<p>With reference to ancient woodland, details on this can be found in in Appendix E Ancient Woodland and Veteran Tree Strategy of the Outline Landscape and Ecological Management Plan.</p> <p>Impacts and mitigation for protected species can be found in Section 6.1 Protected Species Mitigation of the Outline Landscape and Ecological Management Plan.</p> <p>Impacts from other developments and cumulative net loss can be found in ES Chapter 6.17 Cumulative Effects.</p>	<p>6.13.A4) of Environmental Statement Chapter 13: Landscape and Visual (document reference 6.13).</p> <p>Environment Statement Chapter 6.17. Cumulative Effects.</p>
Local Wildlife Sites (LoWS) in Essex	EWT agree that the Norwich to Tilbury Project has minimised impacts on the majority of LoWS in Essex. Appropriate mitigation for impacts on some LoWS remains a matter for discussion	The Norwich to Tilbury Project has minimised impacts on LoWS in Essex where possible and have detailed appropriate mitigation to ensure no long-term residual effects.	N/A
Licensable Species and Designated Sites	EWT has considerable in-house expertise in respect of protected (licensable) species and routinely provides comments to planning authorities and the Planning Inspectorate on protected species matters. EWT also routinely provide comments on matters relating to statutory designated sites, as per their charitable remit. EWT therefore reserve the right to provide comments on the Norwich to Tilbury Project	NG will continue to engage with EWT on this matter.	N/A

Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
	in respect of protected (licensable) species and statutory designated sites		
BNG Offsite Solutions	National Grid have been engaging in productive discussions with EWT regarding the provision of offsite Biodiversity Net Gain units for the Project. National Grid are continuing these discussions with EWT regarding securing the offsite units.	National Grid have been engaging in productive discussions with EWT regarding the provision of offsite Biodiversity Net Gain units for the Project. National Grid are continuing these discussions with EWT regarding securing the offsite units.	N/A
Biodiversity Net Gain (BNG)	<p>Comments provided in response to the Statutory Consultation in July 2024:</p> <ul style="list-style-type: none"> We acknowledge the BNG proposals already put forward, but wish to emphasise that the scheme, if consented, should aspire to deliver 20% BNG. The Wildlife Trusts consider this as vitally important in order to fully address the nature emergency and actively contribute towards nature's recovery. We would therefore encourage National Grid to explore all opportunities to achieve this level of net gain as part of the project. 	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	Biodiversity Net Gain Report (document reference 7.1)
Nature Recovery Network	<p>Comments provided in response to the Statutory Consultation in July 2024:</p> <ul style="list-style-type: none"> Any habitat creation or restoration included as part of the proposal should maximise its contribution towards the 	NG note that opportunities for such improvement are detailed within the Projects WFD assessment and factored in the BNG calculations.	Outline Landscape Ecological Management

Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
	<p>restoration of ecological connectivity and delivery of the emerging Nature Recovery Network.</p> <ul style="list-style-type: none"> 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. Opportunities should be explored for mitigation to include river restoration or enhancements to reprofile/naturalise river banks, improve fish passage for migratory species such as European eel and brown trout, and contribute to natural flood risk management through creation of new wetland areas 	<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>Details of species mitigation in relation to aquatic species is covered in the Aquatic species (including fish and aquatic invertebrates) of Section 6.1 in the Outline Landscape and Ecological Management Plan.</p>	<p>Plan (document reference 7.4)</p> <p>Water Framework Directive Assessment (document reference 7.10)</p> <p>Biodiversity Net Gain Report (document reference 7.1)</p>
Abbotts Hall	<p>EWT interest in Abbotts Hall as a potential to collaborate with the NtT project. Noted this in an email from 18th August 2023:</p> <ul style="list-style-type: none"> Our interest in BNG is to see how this process can become part of the mix to deliver extensive quality habitats on this site in the journey away from Abbotts Hall as a commercial arable farm. The 	<p>NG will continue to meet and work with EWT to understand the opportunities for both parties in relation to wider BNG and Abbotts Hall.</p>	<p>Biodiversity Net Gain Report (document reference 7.1)</p>

Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
	drama of a reimagined Abbots Hall will have the ability to attract the UK's media, and subsequently to inspire and educate the people of Essex for generations to come with a spectacular environment that will deliver a permanent and enormous sense of pride across all of Essex.		

6. Signatures

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

For National Grid

Name: _____

Position: _____

Date: _____

For Essex Wildlife Trust

Name: _____

Position: _____

Date: _____

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