Summary of Written Representations from Suffolk Wildlife Trust

Submitted for Deadline 1: 26th February 2026

Planning Act 2008 (as amended)

In the matter of:

Application by National Grid Electricity Transmission for the Norwich to Tilbury Project

Planning Inspectorate Ref: EN020027

Suffolk Wildlife Trust Registration Identification ref: [redacted]

Suffolk Wildlife Trust (Registered charity no. 262777) is the only organisation dedicated entirely to the conservation of wildlife and restoration of the natural environment in Suffolk. Our work is supported by over 28,000 members. Suffolk Wildlife Trust recognises the climate crisis represents one of the most serious threats to both biodiversity and people; it is intrinsically linked to the biodiversity crisis we also face. Our position remains that the delivery of energy infrastructure must contribute positively towards the biodiversity crisis. Our comments are limited to impacts upon biodiversity and nature recovery (our charitable remit) within Suffolk; however, we extend our support to the representations made by Norfolk Wildlife Trust and Essex Wildlife Trust.

Throughout the progress of the Norwich to Tilbury project Suffolk Wildlife Trust has engaged with National Grid and their project team to discuss our areas of concern. Through this process we have already seen changes made to the scheme design alleviating some concerns.

Our written representation provides further detail on the following:

- The Waveney and Little Ouse Landscape Recovery Project (WaLOR) & the crossing of the River Waveney Valley. Here our concerns relate to the proposed river restoration works, to ensure that timings of works do not impact either WaLOR or proposed Norwich to Tilbury works, which include the undergrounding of an existing overhead line.
  We are pleased to see that suitable bird diverters are to be included between RG087 and RG88 but query whether they should be installed south of RG088, extending south of the River Waveney. This should be determined by future monitoring.
- We have ongoing concerns regarding three County Wildlife Sites. Thrandeston Marsh CWS, Fore and Bushy Groves CWS, and Sproughton Park CWS, where undergrounding works are proposed for an existing overhead line. Suitable mitigation is provided and we seek assurances that measures will be in place to ensure that habitat restoration is delivered as proposed.
  Additionally, at Sproughton Park we seek clarity that measures will be put in place to ensure that access to hibernacula for reptiles is assured. We are concerned that access may be lost as the site is severed by the trench created for undergrounding works. We recommend that additional hibernacula are created to ensure access and leave a lasting enhancement.
- Hazel dormice are a key species and a flagship of the Dedham Vale National Landscape. While we acknowledge that much detail regarding mitigation will be included within the Natural England licence, we strongly advocate for measures to be in place to retain connectivity where hedgerows are lost. This should be in place, alongside suitable monitoring, until hedgerows are of established maturity that they are considered suitable habitat for hazel dormice.
- Bats, notably barbastelle, may also be impacted by hedgerow loss as commuting routes are severed. Suffolk Wildlife Trust agree with the proposed bat flyway locations and advocate for monitoring of these to provide further certainty in their effectiveness.

- Suffolk Wildlife Trust are interested in the delivery of Biodiversity Net Gain. Firstly, it must be remembered that Biodiversity Units are a proxy for biodiversity value; the Project should be delivering a biodiversity legacy which offers genuine long-term biodiversity benefit to Suffolk, Norfolk and Essex. The delivery of Biodiversity Net Gain should focus on those areas identified by the Local Nature Recovery Strategy.
  We seek assurances that the delivery of watercourse units, which is reliant on enhancement measures, will include an ongoing monitoring and management commitment. This should include a commitment to remove invasive non-native species in perpetuity.
  It is the view of Suffolk Wildlife Trust that any habitat defined as providing compensation for a loss of nesting bird habitat should not contribute beyond no-net-loss. We therefore ask that National Grid provide suitable evidence of both mitigation and compensation in relation to how these are considered regarding Biodiversity Net Gain.
- Suffolk Wildlife Trust recommend that, as part of the DCO process, an Ecological Advisory Group (EAG) is established

Suffolk Wildlife Trust will continue to work with the Applicant on these concerns and seek to ensure the best possible outcomes for biodiversity and nature recovery, which can in part be delivered by following the recommendations made within our Written Representation, where more detail on the above comments is provided.

Written Representations

from

Suffolk Wildlife Trust

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Contents

1 Introduction

1.1 Suffolk Wildlife Trust

Suffolk Wildlife Trust (Registered charity no. 262777) is the only organisation dedicated entirely to the conservation of wildlife and restoration of the natural environment in Suffolk. Our work is supported by over 28,000 members. Since formation in 1961 the Trust has been at the forefront of wildlife conservation and nature recovery in Suffolk. Our work sees us engage with communities, schools, farmers, landowners, councils, MPs, and businesses as well as managing 50 nature reserves totalling over 2800ha.

1.2 Summary of Concerns

Suffolk Wildlife Trust recognises that the climate crisis represents one of the most serious threats to both biodiversity and people; it is also intrinsically linked to the biodiversity crisis we also face. We understand that reducing carbon emissions from the UK's energy system is essential, and the transition to renewable energy will play a crucial role in addressing the climate emergency. The Trust supports renewable energy development in principle, including associated network infrastructure, where impacts on wildlife and habitats can be avoided or minimised through sensitive siting and careful design.

The position of Suffolk Wildlife Trust remains; the delivery of energy infrastructure must contribute positively towards protecting and restoring nature.

Our comments on the Norwich to Tilbury Project are limited to impacts upon biodiversity and nature recovery (our charitable remit) within Suffolk. However, we offer our support to comments made by Essex Wildlife Trust and Norfolk Wildlife Trust.

Throughout the progress of the Norwich to Tilbury project Suffolk Wildlife Trust has engaged with National Grid and their project team to discuss our areas of interest and concern. Through this process we have already seen changes made to the scheme design alleviating some concerns; however, a number remain regarding the following:

- The Waveney and Little Ouse Landscape Recovery Project (WaLOR) & the crossing of the River Waveney Valley
- County Wildlife Sites
- Hazel dormice
- Bats
- Biodiversity Net Gain

We acknowledge and agree that through route selection and design, effort has been made to avoid crossing or impacting protected wildlife sites in Suffolk. This is in line with the Mitigation Hierarchy.

Based on the information provided within the Application we remain concerned about the potential impacts to habitats within non-statutory protected sites and important sites for biodiversity and nature recovery. While we are satisfied that efforts to minimise impacts have been made, construction phase impacts and post-development restoration and creation remain a concern:

- in the Waveney Valley, where overhead lines cross the WaLOR project.
- within Thrandeston Marsh CWS, Sproughton Park CWS, and Fore and Bushy Groves CWS, where the undergrounding of existing overhead lines is proposed.

Where habitats, frequently linear habitats such as hedgerows, are to be severed by the project, we are concerned about the loss of habitat connectivity for wildlife. Specifically, we are concerned about impacts to:

- Hazel dormice *Muscardinus avellanarius* within the Dedham Vale National Landscape.
- Bats, notably Barbastelle *Barbastella barbastellus*, within the Dedham Vale National Landscape.
- The Key Reptile population at Sproughton Park CWS.

The delivery of Biodiversity Net Gain for the project is welcomed, and we encourage the delivery of net gain to go beyond the 10% minimum required. We are pleased to see that where habitat cannot be restored to baseline condition or better within two-years, habitat will be treated as lost and will be replaced by a suitable like-for-like or higher distinctiveness habitat.

However, questions remain regarding several aspects of proposed Biodiversity Net Gain delivery including how habitat delivered as part of Biodiversity Net Gain requirements appears to be put forward as compensation for a loss of breeding bird habitat, how watercourses will be enhanced to deliver net gain, and the role of the Local Nature Recovery Strategy.

Suffolk Wildlife Trust strongly advocate for the project to deliver a genuine biodiversity legacy while delivering the 10% minimum gain commitment.

2 General Comments

2.1 The Mitigation Hierarchy

Suffolk Wildlife Trust expect a strong adherence to the mitigation hierarchy when it comes to biodiversity. The Mitigation Hierarchy is:

- Avoid impacts where possible, seeking to minimise impacts if they cannot be avoided
- Mitigate during works to minimise impacts
- Compensate for any impacts made
- Enhance to leave a net gain for biodiversity

We acknowledge and agree that changes to the proposed route have already been made following discussions and recommendations from engagement with Suffolk Wildlife Trust, these have avoided or minimised impacts in line with the Mitigation Hierarchy.

Overall, we look forward to continued engagement on several topics and hope that these lead to continued improvements to the project and genuine biodiversity upsides to the project.

2.2 Support for Norfolk &Essex Wildlife Trust Comments

Suffolk Wildlife Trust wish to extend our support to those comments made by Norfolk Wildlife Trust and Essex Wildlife Trust within their Written Representations. While separate organisations, we are united under the banner of the Royal Society of Wildlife Trusts and seek to work closely with each other where boundaries meet and projects, such as Norwich to Tilbury, cross statutory boundaries.

2.3 Ecology Advisory Group

Suffolk Wildlife Trust strongly suggest the establishment of an Ecological Advisory Group (EAG) to advise on the design and implementation of ecology and biodiversity compensation and mitigation associated with the construction and operational lifetime of the proposed Norwich to Tilbury Project.

The EAG should comprise representatives of, at a minimum, county and local councils (or their future functional equivalents), statutory bodies (including Natural England and the Environment Agency), and non-statutory nature organisations (including Suffolk, Norfolk, and Essex Wildlife Trusts).

While we appreciate that this is a linear project covering multiple authorities, which has meant that such a group has not yet been established, meetings between Norfolk and Suffolk, and Suffolk and Essex representatives have proved useful. We believe that an overarching group united by jointly agreed principles and ambitions could support focussed discussions which may provide the best possible biodiversity outcomes for the project.

2.3.1 Proposed EAG Remit

- The Ecology Advisory Group is a long-term partnership providing an interactive and sustainable vehicle for dealing with biodiversity matters to meet the ambition for the Norwich to Tilbury Project. The Group will advise on:
    - the achievement of biodiversity enhancement as laid out in the Development Consent Order
    - communication regarding biodiversity matters between the Scheme and relevant stakeholders;
    - the need to respond within the terms of reference of the Group to the changes that will occur over its lifetime, e.g. in policy and legislation; and
    - the co-ordination of any research projects planned around the Scheme and dissemination of the outcomes providing both feedback within the Scheme and externally.
- This will cover the pre-construction phase, post-construction phase and decommissioning (where relevant).
- The Ecology Advisory Group comprises Scheme representative(s), Natural England, local host authorities, wildlife trusts, other relevant stakeholders and, if relevant, research group representative(s).
- *Further details of the Ecology Advisory Group will be included in the detailed document, such as a LEMP, with terms of reference including such aspects as scrutiny of monitoring data, adaptive habitat management, site conditions, and working practices where necessary to meet the ambition for the Project.*

[emphasis added]

2.1 Suffolk Wildlife Trust Capacity

Due to resource limitations, Suffolk Wildlife Trust regrets that it may not be able to attend all issue-specific hearings or submit written responses for all Examination deadlines. We propose to engage with the Examination primarily via the submission of Written Representations and the agreement of a Statement of Common Ground with National Grid, setting out clearly the initial areas of disagreement and revised near the end of the Examination to show our final position. As part of this, we will continue our discussions with the Applicant to seek to resolve areas of concern where possible.

3 WaLOR

3.1 Summary of the WaLOR Project

The Waveney and Little Ouse Recovery (WaLOR) Project is a Landscape Recovery scheme led by Suffolk Wildlife Trust, in partnership with the Environment Agency and landowners in the Waveney and Little Ouse headwaters catchment. The WaLOR Project is part of the DEFRA Landscape Recovery pilot program and focuses on the restoration and enhancement of the Waveney and Little Ouse River catchments on the Suffolk/Norfolk border. The project brings together a range of stakeholders, including landowners, farmers, local communities, and conservation organisations.

The WaLOR project aims to address various environmental challenges in the area, such as habitat degradation, water pollution, and declining biodiversity by implementing landscape-scale restoration.

The delivery of components of the WaLOR project are proposed where the Norwich to Tilbury project crosses the Waveney River Valley, with timescales for delivery in this area of the valley not yet fixed for either project. Ongoing discussion is therefore essential regarding scheduling for both WaLOR and the Norwich to Tilbury Project to ensure continued compatibility between both projects.

3.2 Areas of Concern for WaLOR Project Delivery

3.2.1 River Restoration

A key component of the WaLOR project is the restoration of the section of the River Waveney between Dolt Lane and Royden Fen, where the Norwich to Tilbury Project crosses the valley. The aim of restoring the old meander in this section is to promote slow water flow, restore and increase floodplain water storage, and increase biodiversity.

Details of the interaction of the river restoration and the Norwich to Tilbury Project have been discussed by Suffolk Wildlife Trust and the Norwich to Tilbury Project Team. We acknowledge that pylon locations have been changed in part to reduce impacts on the river restoration. A key issue is the timings of works, which are not yet defined for either project, and ongoing discussions to keep all parties informed regarding timing are planned and an essential requirement for effective coordination between WaLOR and Norwich to Tilbury.

3.2.2 Undergrounding of Existing Overhead Line

An existing 33kV overhead line will be undergrounded as part of the project. Ongoing discussion over the detailed planning and delivery of this work (including timing, and micro-siting of telegraph poles and underground cables) is needed to ensure coordination and compatibility between WaLOR works and Norwich to Tilbury.

Following the undergrounding of the existing line and beyond the habitat reinstatement works outlined as part of the Outline LEMP[1] Suffolk Wildlife Trust also recommend that post-development monitoring is undertaken following restoration to ensure that restoration is successful and that the extent of bare ground has not been colonised by undesirable species such as common nettle *Urtica dioica* or invasive non-native species. If necessary, remedial measures to the habitat management may be required (which should be funded by National Grid).

3.2.3 Peat Soil Creation

The creation of peat soil, a vital carbon store and potential WaLOR project revenue source from the sale of environmental credits, will be promoted in the Waveney valley crossed by the Norwich to Tilbury Project. Peat soils are already present here and WaLOR proposals to create a wetter area here, through the re-meandering and other habitat creation, will aid further peat creation.

The removal of what was previously Pylon RG088 (a pylon location now removed from the project) has avoided impacts to an area where peat soils are known to be present. This has improved the environmental outcome of the proposed Norwich to Tilbury scheme.

3.2.4 Bird Strike

Suffolk Wildlife Trust accept the assessment that bird strike is unlikely to cause significant impacts to populations of wild birds in the area. We also welcome the acknowledgement within supporting documents that the WaLOR Project will likely see an increase in wetland birds moving through the Waveney Valley, increasing from the baseline numbers identified during supporting surveys.

[1] National Grid, 2025, Norwich to Tilbury Volume 7: Other Documents 7.4 Outline Landscape and Ecology Management Plan, Final Issue A August 2025, AENC-ARC-ENV-REP-0035

We therefore welcome the inclusion of diverters at this location. As stated within Chapter 8 Ecology and Biodiversity of the supporting Environmental Statement[2] the NPS for Electricity Networks Infrastructure (EN-5)[3] highlights the need for diverters or bird flappers.

Detail on the markers used is provided in Section 8.6.4 (Embedded Mitigation) and section 6.1 of the Outline LEMP where it is stated that orange spacers and bird diverters will be applied to the earth wire. Research suggests that markers incorporating reflective, glow-in-the-dark, high contrast, and moving elements are likely to be most effective[4][5] and Suffolk Wildlife Trust expect the use of products which meet these criteria.

The provided documents do not state the distance apart at which diverters will be placed; however, a typical placement is at intervals of 10m. Suffolk Wildlife Trust suggest that monitoring of the effectiveness of this mitigation is undertaken, with distance between markers reduced if deemed necessary. Monitoring may also suggest that the location where markers are installed is extended to the south, beyond Pylon RG88 and to the south of the River Waveney itself, where they are not currently proposed.

If there appears a significant impact on species of conservation concern, then further consideration to provide funding for habitat enhancement measures for said species should also be provided as compensation.

3.2.5 Need for Future Access by National Grid

Suffolk Wildlife Trust recognise the need for future access for maintenance, and the potential impacts of this access are reduced by the removal of what was Pylon RG088, which significantly reduces the likely need for future maintenance access to areas where peat soils are present.

We understand that no permanent access is proposed for the Wavey Floodplain, with the proposed pylon locations accessed from High Road and Ling Road. It is therefore unlikely that access will create any significant impacts to habitat created as part of the WaLOR project. However, any changes to this or works requiring access between pylons may be a concern and could impact habitat condition (and therefore impact on delivery of the project and its saleable outputs, e.g. Biodiversity or Carbon Units).

4 County Wildlife Sites

County Wildlife Sites (CWSs), sometimes referred to as Local Wildlife Sites in other counties, play a vital role in conserving biodiversity within Suffolk. Suffolk has over 950 County Wildlife Sites, amounting to around 11,000 hectares and covering almost 3% of the county. The designation is non-statutory but recognises the high value of a site for wildlife; many CWSs are of county, regional, or even national importance. They are often designated because they support characteristic or threatened species or habitats. CWSs serve as stepping stones of high biodiversity interest which are vital for establishing coherent ecological networks linking statutory sites and provide refuges for wildlife largely absent from surrounding land which can recolonise along ecological corridors. This is recognised in their inclusion as core sites in the Local Nature Recovery Strategy, which describes CWS as providing '*vital refuges for wildlife and stepping stones between other areas of habitat*.'

[2] National Grid, 2025, Norwich to Tilbury Volume 6: Environmental Statement (Document 6.8 ES Chapter 8 Ecology and Biodiversity, Final Issue A August 2025, AENC-ARC-ENV-REP-0035

[3] Department for Energy Security & Net Zero, Overarching National Policy Statement for Energy (EN-5), December 2025.

[4] Verbelen D, Bovens W, Dwyer JF, Swinnen K. Wire marking reduces bird collisions with a transmission powerline in western Belgium. Bird Conservation International. 2024;34:e25. doi:10.1017/S0959270924000169

[5] Ferrer, M., Morandini, V., Baumbusch, R., Muriel, R., De Lucas, M., and Calabuig, C., 2020, Efficacy of different types of "bird flight diverter" in reducing bird mortality due to collision with transmission power lines, *Global Ecology and Conservation,* Vol 23.

The protection afforded to CWSs, as a non-statutory site, is less than a statutory site (such as a Site of Special Scientific Interest). However, as recognised sites of biodiversity interest there remains a requirement, as part of NPS for Electricity Networks Infrastructure EN-1[6] and notably EN-5 for their consideration and protection as part of the Norwich to Tilbury Project.

Suffolk Wildlife Trust agree that National Grid has, where reasonably possible, sought to avoid direct impacts to CWSs through design (demonstrated by changes made during and following previous consultations).

Where impacts occur, reasonable measures are put forward in line with the Mitigation Hierarchy. However, we do put forward further comment below regarding the potential impacts on three CWSs within Suffolk.

4.1 Thrandeston Marsh CWS

4.1.1 Site Information

Thrandeston Marsh is an area of Common land situated to the northwest of the village of Thrandeston and immediately to the east of the Norwich to London railway line. The site consists of several plant communities, with much of the site waterlogged for much of the year. This area supports a herb-rich plant community including several wetland plants which are becoming increasingly scarce in Suffolk. There is habitat connectivity via hedgerows and the railway line embankment to the wider landscape. Thrandeston Marsh retains an important wetland community and is therefore a valuable addition to the Register of County Wildlife Sites in Mid Suffolk.

While the main works associated with the Norwich to Tilbury project do not impact the CWS, associated works will see the undergrounding of an existing 132kV overhead line through c.145m of the southeast of the site, adjacent to the site boundary with Little Green (a minor road) where it is noted that 0.29ha of *other neutral grassland* will be temporarily lost. This area is mapped as a priority habitat (Good Quality Semi-Improved Grassland) which is in keeping with the *ONG* assessment. In addition to the temporary loss of habitat the potential for hydrological effects is identified, with suitable mitigation provided.

Also identified as a potential impact is accidental encroachment, the inclusion of this potential impact is welcomed. Accidental encroachment could significantly increase the area of priority habitat impacted.

4.1.2 Habitat Restoration

Suffolk Wildlife Trust understand that the undergrounding of the overhead line here will be significantly smaller scale than works to underground the high voltage Norwich to Tilbury line, with a reduced working area of 20m width through the CWS. An Ecological Clerk of Works (ECoW) will provide suitable briefing as defined within the Outline LEMP. The role of the ECoW should include ensuring that the 20m working width is stringently followed, with block-and-panel fencing used as necessary.

The reinstatement of grassland is considered within the Outline LEMP. Suffolk Wildlife Trust agree that reinstatement should be undertaken at the earliest appropriate time of year following works. Seeding is proposed for most areas as opposed to natural regeneration, as defined within the Outline LEMP.

The reinstatement of original turf is not considered, which we see as acceptable for this location where works avoid the most floristically important areas. The identification of a suitable seed mix should be informed by surveys already undertaken at Thrandeston Marsh CWS. Further consideration could extend to the use of locally sourced green hay.

We also recommend that post-development monitoring is undertaken following restoration to ensure that restoration is successful and that the extent of bare ground has not been colonised by undesirable species such as common nettle *Urtica dioica* or invasive non-native species. Monitoring should be undertaken after one, three, and five years, with remedial management measures undertaken if restoration is not delivering

[6] Department for Energy Security & Net Zero, Overarching National Policy Statement for Energy (EN-1), December 2025.

the desired outcomes. The use of green hay could again be considered at this stage as part of remedial measures to increase floral diversity.

4.2 Sproughton Park CWS

4.2.1 Site Information

Sproughton Park CWS contains an extensive patchwork of grassland fields, alder carr, dense scrub and hedgerows along the valley side of the Belstead Brook.

Some of the wet grassland fields contain springs emerging from where Red Crag meets impermeable London Clay on the valley side. This gives rise to calcareous seepage zones in the fields and flowing freshwater ditches to the brook. The springs also feeds onsite ponds. This junction between Red Crag and London Clay is of limited extent in the country and is particularly characteristic of the shallow river valleys of the southern Suffolk Sandlings.

The ditches and ponds are important for water vole *Arvicola amphibius* and water shrew *Neomys fodiens* (a Priority species) and associated wetland wildlife including amphibians and dragonflies.

Although semi-improved, the wet grassland retains floral species of interest and indicative of impeded drainage including ragged robin *Lychnis flos-cuculi*, cuckoo flower *Cardamine pratensis*, and a large stand of brown sedge *Carex brunnescens*. The grassland makes ideal habitat for small mammals and therefore good hunting habitat for the Barn Owl *Tyto alba* (a Priority Species). Badgers *Meles Meles* are also known to occur on site, and the mosaic of grassland and hedges is also ideal feeding habitat for bats.

Alder Carr is a biodiversity priority habitat (Wet Woodland) and known to be of great importance for invertebrates. Otter *Lutra lutra* (priority species) has been seen on the Belstead Brook and the woodland provides ideal lying up habitat for this species, as well as overhanging perches for Kingfisher *Alcedo atthis* hunting along the river.

The site includes a network of native hedgerows and veteran trees. In combination with the other habitat on site, these hedges are ideal habitat for a wide range of birds. This is reflected in the species recorded for the site, which includes several farmland bird biodiversity priority species: yellow hammer *Emberiza citrinella*, linnet *Linaria cannabina*, bullfinch *Pyrrhula pyrrhula*, starling *Sturnus vulgaris*, house sparrow *Passer domesticus*, reed bunting *Emberiza schoeniclus*, song thrush *Turdus philomelos*, and turtle *dove Streptopelia turtur*.

Surveys supporting the Norwich to Tilbury Project identified the CWS as Key Reptile Site (as defined by FrogLife[7]), supporting grass snake *Natrix natrix*, slow-worm *Anguis fragilis*, and common lizard *Zootoca vivipara*.

The CWS is crossed by the project with pylon JC16 located within the CWS boundary. This will see a small permanent area of habitat lost, with another area temporarily lost as part of construction, including a temporary haul road. Any trees within the 40m swathe around the pylon route will be removed. An existing 132kV overhead line crosses the site, perpendicular to the proposed Norwich to Tilbury route; this line will be undergrounded as part of the Norwich to Tilbury project, with a working width of 25m stated within the ES.

Habitat loss on the CWS includes a range of habitats (Table 8.23 Impact assessment including residual effects on ecology and biodiversity receptors during construction); the greatest loss is the 1.39ha of *other neutral grassland*, with no other losses proposed greater than 0.03ha. As with Thrandeston Marsh CWS, it is also considered that accidental encroachment could see the area of habitat lost increase.

[7] Froglife (1999) *Froglife Advice Sheet 10: Reptile Survey – an introduction to planning, conducting and interpreting surveys for snake and lizard conservation*. [online]

4.2.2 Habitat Restoration

Suffolk Wildlife Trust understand that the undergrounding of the overhead line here will be significantly smaller scale than works to underground the high voltage Norwich to Tilbury line, with a reduced working area of 25m width through the CWS. An ECoW will provide suitable briefing as defined within the Outline LEMP. The role of the ECoW should include ensuring that the 25m working width is stringently followed, with block-and-panel fencing used to reduce the likelihood of encroachment occurring. We believe that similar methods are required where the haul road is installed to reduce the risk of accidental encroachment.

Suffolk Wildlife Trust agree that reinstatement should be undertaken at the earliest appropriate time of year following works. Seeding is proposed for most areas as opposed to natural regeneration, with the reinstatement of original turf is not considered. The identification of a suitable seed mix should be informed by surveys already undertaken at Sproughton Park CWS. The use of green hay has not been considered but would provide an additional option to promote local provenance.

We also recommend that post-development monitoring is undertaken following restoration to ensure that restoration is successful and that the extent of bare ground has not been colonised by undesirable species such as common nettle or invasive non-native species. Monitoring should be undertaken after one, three, and five years, with remedial management measures undertaken if restoration is not delivering desired outcomes. The use of green hay could again be considered at this stage as part of remedial measures to increase floral diversity while retaining local provenance.

4.2.3 Impacts to Reptiles

Suffolk Wildlife Trust are content that proposed mitigation will suitably reduce the potential for direct killing or injuring of reptiles to a negligible extent; the Outline LEMP details reasonable avoidance measures which will be implemented at Key Reptile Sites (including Sproughton Park CWS) within Section 6.1.47 – 6.1.50. Suffolk Wildlife Trust agree that these methods, which follow standard practice, are suitable and should be used at Sproughton Park CWS.

Our concerns are focussed on whether the proposed undergrounding of the existing overhead line will impact the reptile population and how they use the site. Significantly, we note that the Outline LEMP does not consider habitat fragmentation impacting the reptile population.

Dependant on the timing and duration of works, the open trench onsite could create a significant barrier stopping a proportion of the population from reaching hibernacula. Failure to have access to hibernation sites in autumn could significantly impact the reptile population at a Key Reptile Site.

Suffolk Wildlife Trust seek assurances that measures will be put in place to ensure reptiles have suitable access to hibernacula.

The easiest method to insure this is to create new hibernacula either side of the undergrounded overhead line to ensure that no individual is isolated from hibernacula. These new hibernacula should be constructed following input and advice from the Project Ecology Team, with work overseen by a ECoW. Following completion of works, hibernacula should be left in place to provide enhancement for the onsite reptile population. Suffolk Wildlife Trust strongly suggest that post-development monitoring of the population is undertaken to ensure the CWS continues to qualify as a Key Reptile Site.

4.3 Fore and Bushy Groves CWS

4.3.1 Site Information

It is considered that Fore and Bushey Groves, which are now two small woods separated by a track and an area of dense scrub, were at one time joined together to form one larger woodland. The large proportion of

the woods has a uniform structure consisting of field maple *Acer campestre* and hazel *Corylus avellana* coppice with ash *Fraxinus excelsior* standards.

A notable feature of Fore Grove is the wild service-tree *Sorbus torminalis*, a rare species both nationally and regionally, which is typically restricted to ancient woodlands. The ground flora of both woods is very similar. Dog's mercury *Mercurialis perennis* is dominant throughout and interspersed with patches of early-purple orchid *Orchis mascula* and primrose *Primula vulgaris*.

Fore and Bushy Groves CWS lies adjacent to the Draft Order Limits, with an existing RG 33kV line being undergrounded through the CWS. This will result in the temporary loss of 0.25ha of lowland mixed deciduous woodland, although it is noted that this is where the existing 33kV line runs and no mature trees are present in this corridor due to management constraints in place by the existing overhead lines. This swathe has been present within the area of woodland for over 80 years, with aerial photographs from 1945 clearly showing the route of the overhead lines[8]. The ES states that the undergrounding would take place on the existing alignment, with no working width provided (unlike at Thrandeston Marsh or Fore and Bushy Grove CWSs); it is therefore assumed that works will be undertaken within the existing swathe, however clarity on this is welcomed. In addition to this there is potential for accidental encroachment to impact a wider area.

4.3.2 Habitat Restoration

While this represents as a loss of priority habitat (Deciduous woodland) the existing habitat is one where no mature trees are present. Woodland edge is a valuable part of the woodland ecosystem, and it is likely that biodiversity is high in this area of the wood. Without mature trees present, restoration to the current habitat can be delivered, although it is noted that recovery is likely to take longer here than in other impacted CWSs which are primarily impacting grassland habitats.

Guidance within the Outline LEMP for the reinstatement planting of woodland habitats suggests that low height, shallow rooted shrub species will be planted; these do potentially fit within the woodland edge habitat already present. The species proposed for shrub planting, provided within Appendix C of the Outline LEMP[9] are typically frequent within Suffolk woodland shrub layers, and the final selection should focus on those species already present within the CWS; if suitable, wild-service tree should be included in addition to those outlined. The species present are known to have benefits to wildlife, which we support.

If species which already occur within the planting list proposed (as included in Appendix C of the Outline LEMP) are present within the area of the CWS then Suffolk Wildlife Trust would support an element of natural regeneration being allowed to occur in this area. If this were to be undertaken then we understand that as per the previous habitat, management restrictions would be in place.

Given the need for ongoing management to ensure vegetation growth remains suitable over the undergrounded 33kV line Suffolk Wildlife Trust assume that monitoring will be undertaken here.

Suffolk Wildlife Trust further would welcome the inclusion of any additional support which could be provided to the landowner towards management of the CWS.

[8] Google Earth Pro, 1945. *Land south of Tye Lane, Bramford, Suffolk.* Imagery provided by Cambridge University Committee for Aerial Photography / RAF (Online: accessed February 2026).

[9] National Grid, 2025, Norwich to Tilbury Volume 7: Other Documents 7.4 Outline Landscape and Ecology Management Plan, Appendix C- Planting Schedules, Final Issue A August 2025, AENC-ARC-ENV-REP-0179

5 Impacts to Key Suffolk Species

5.1 Hazel Dormice

5.1.1 Conservation Status of Hazel Dormice in Suffolk

Hazel dormice are a nationally scarce species which has suffered a population decline of 70% this century, driven by habitat loss and fragmentation, with the Suffolk and Essex population of national importance. The species is reliant on deciduous woodlands and ancient coppice as well as species-rich hedgerows, for nesting and for food throughout the year. Recent understanding is that hedgerows, notably species-rich mature hedgerows, are significantly more important than previously thought, providing a vast majority of habitat requirements in addition to landscape connectivity between parcels of woodland. Hazel dormice are a flagship species for the Dedham Vale National Landscape, the stronghold of the species in Suffolk.

Suffolk Wildlife Trust have raised question over the submitted records of hazel dormice within the Dormice Report supporting the Norwich to Tilbury project[10], with several records which occur outside the known range of the species in Suffolk being inconclusive (identification from nests as opposed to recorded dormice, dormice footprints, or nuts featuring characteristic hazel dormice markings).

We understand that discussions between the Project Ecology Team and Natural England regarding a project level licence for hazel dormice are ongoing and a licence will be agreed. Suffolk Wildlife Trust have not been part of these conversations.

There are areas outside of the Natural England licence which we believe require further consideration, including the potential to significantly improve hazel dormice mitigation practices for future projects.

5.1.2 Hedgerow Loss & Fragmentation

While we acknowledge the role of Natural England within the licencing process, we remain concerned about hedgerow loss within areas where hazel dormice are known or suspected to be present. Hedgerow loss can impact dormice in several ways; killing or injuring during removal, a loss of foraging habitat, a loss of shelter, and a loss of landscape scale connectivity. The most severe impacts will be considered as part of the licence agreement between the Norwich to Tilbury Project Team and Natural England.

However, there are still areas of concern outside those to be agreed under licence which Suffolk Wildlife Trust are keen to pursue. Key areas are the retention of connectivity during construction and the short-to-medium term mitigation required to retain connectivity until replacement hedgerows mature. In addition to the delivery of these, we strongly advocate for continued monitoring of these measures.

Habitat Fragmentation

Suffolk Wildlife Trust are not involved in licensing discussions between the Norwich to Tilbury Project Team but understand that as part of these, as well as compensation measures and Biodiversity Net Gain requirements, hedgerows will be reinstated with suitable species (i.e. suitable for planting over the underground cable route and where possible suitable or beneficial for hazel dormice). However, there is a significant, in terms of the typical lifespan of an individual hazel dormouse, delay in hedgerows becoming suitable for hazel dormice to use (as much as 7-10 years). Habitat can therefore be seen as fragmented during construction and potentially for the next 5-10 years.

Suffolk Wildlife Trust therefore expect mitigation design to deliver retained connectivity during construction where possible, including during short-term periods of inactivity (such as weekends, overnights, bank

[10] National Grid, 2025, Norwich to Tilbury Document: 6.8.A12 Environmental Statement Appendix 8.12 - Hazel Dormouse Report, Final Issue A August 2025, AENC-ARC-ENV-REP-0144

holidays), as well as medium-term mitigation delivering habitat connectivity viable for 5-10 years until newly planted hedgerows can provide suitable habitat.

In-combination Impacts

The impacts of short-and-medium-term hedgerow loss associated with Norwich to Tilbury are replicated by other nationally and regionally significant infrastructure projects, both ongoing and proposed, occurring within an overlapping 10-year period (these include: Bramford to Twinstead and SPA Bury St. Edmunds to Colchester water transfer scheme). In combination, short-and-medium-term hedgerow loss as a result of these schemes is likely to have more significant and widespread impacts on dormouse populations in Suffolk and Essex than would be the case for any of the schemes in isolation

Suffolk Wildlife Trust accept that it is not the job of one project to offer mitigation and compensation for such impacts. However, one recurring theme we have identified is variation within the proposed mitigation for the short-term loss of connecting habitat where hedgerow removal occurs (in the delivery of linear underground infrastructure projects, typically for electricity or water supply).

That mitigation, typically in the form of artificial bridges, is delivered is a positive, however the variation in methodology and lack of detailed monitoring of its effectiveness means there is a lack of genuine evidence that such mitigation is working. Where monitoring at the mitigation location has taken place, it does not typically coincide with monitoring within the wider surrounding landscape, meaning it is unknown if mitigation is unsuccessful due to design, or due to the lack of presence of hazel dormice. Filling this evidence gap is essential to inform good design and ensure the best possible outcome for hazel dormice.

5.1.3 Recommendation for Monitoring

Suffolk Wildlife Trust welcome the project-wide hazel dormice survey undertaken to supporting the Norwich to Tilbury Project, which included areas well outside the known range of the species, but where presence has been suspected. While we have raised questions about some findings provided within the Hazel Dormice Report, the assessment provided is thorough.

Our recommendation is that ongoing monitoring, during construction works, is undertaken on a regular basis as part of the project to provide data on dormice presence/ absence where any mitigation for hedgerow loss is delivered, as well as the area surrounding this (where access is possible). The monitoring of works around other key locations, including where hazel dormice records were included within Project Surveys, and areas of highly suitable habitat (notably including the transition from overhead line to undergrounding to the east of Raydon Great Wood where the scheme crosses a former railway line).

5.2 Barbastelle Bats

5.2.1 Conservation Status of Barbastelle in Suffolk

The bat surveys supporting the Norwich to Tilbury Project show a minimum of eight species recorded, including the presence of barbastelle[11]. While we seek the best possible mitigation and outcomes for all bat species, as a notably rare species which is typically present in low numbers, barbastelle is a priority. Delivering the best mitigation and outcomes for barbastelles will likely be better for other bat species as well.

Barbastelles are considered one of the UK's rarest bats, listed as *vulnerable* in England and globally *near-threatened*. The species is strongly linked to woodlands, and it is likely that hedgerows play an important role in connecting key woodland areas, as well as providing potential foraging habitat for the species. As shown in

[11] National Grid, 2025, Norwich to Tilbury Volume 6: Environmental Statement, Document 6.8.A10 ES Appendix 8.10 – Bat Activity Survey Report, Final Issue A August 2025, AENC-ARC-ENV-REP-0142

Table A8.10.6 of the Bat Activity Report, a majority of barbastelle passes recorded were within Suffolk Sections of the project.

We appreciate that many concerns regarding hedgerow loss and impacts to bats are similar to the concerns regarding hazel dormice, albeit with very little potential for direct impacts.

5.2.2 Habitat Loss & Fragmentation

Suffolk Wildlife Trust remain concerned that the construction process, notably through the undergrounded section of the project in Suffolk (through Dedham Vale National Landscape), will see numerous gaps created within the hedgerows where trenching is used. This could create short- and medium-term loss of connecting habitat. While we acknowledge that gaps will be minimised, research has shown that gaps of as little as 10m may be significant for bats[12].

Suffolk Wildlife Trust therefore expect mitigation design to deliver retained connectivity during construction where possible, including during short-term periods of inactivity (such as weekends, overnights, bank holidays). The proposed design of the artificial bat flyway is what as expected and Suffolk Wildlife Trust welcome the use of any natural materials to bolster this and encourage the Project Team to avoid the use of plastics where possible.

We understand that hedgerows will be reinstated post-construction with suitable species (i.e. suitable for planting over the underground cable route). However, there is delay in hedgerows becoming of significant value for bats, and mitigation should be provided until hedgerows return to the condition, they were in prior to works taking place.

5.2.3 Recommendation for Monitoring

The impacts of short-and-medium-term hedgerow loss associated with Norwich to Tilbury are replicated by other nationally and regionally significant infrastructure projects (including those noted previously), both ongoing and proposed, occurring within an overlapping 10-year period in Suffolk (and north Essex, where the Dedham Vale National Landscape extends).

Suffolk Wildlife Trust accept that it is not the job of one project to offer mitigation and compensation for such impacts. However, one recurring theme we have identified is variation within the proposed mitigation for the short-term loss of connecting habitat where hedgerow removal occurs (in the delivery of linear underground infrastructure projects, typically for electricity or water supply).

That mitigation, typically in the form of artificial bridges, is delivered is a positive, however the variation in methodology and lack of detailed monitoring have significant failings; namely, the lack of genuine evidence that such mitigation is working. The Strategic Pipeline Alliance project included some monitoring of mitigation measures provided for bats where hedgerow loss occurred and this highlighted the need for further research into the mitigation measures proposed to retain hedgerow connectivity for bats[13]. As far as we are aware, this is the only publicised study we are aware of assessing these concerns in Suffolk.

Suffolk Wildlife Trust therefore encourage and support the concept of continued monitoring around all proposed artificial flyways included within the Norwich to Tilbury Project.

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[12] Entwistle, A. C., Harris, S., Hutson, A. M., Racey, P. A. & Walsh, A. (2001). Habitat management for bats – A guide for land managers, land owners and their advisors. Joint Nature Conservation Committee, Peterborough, UK. ISBN 1 86107 528 6

[13] Slack, G., 2022, *Using camouflage to help bats see: The use of 'bat fencing' to retain connectivity Greg Slack; The Strategic Pipeline Alliance* British Island Bats Volume 3 2022 Pg.29-35.

6 Biodiversity Net Gain

Suffolk Wildlife Trust understand that the Norwich to Tilbury Project does not fall within mandatory Biodiversity Net Gain requirements, but that there are requirements and commitments for Biodiversity Net Gain that must be delivered. We therefore expect that the Biodiversity Net Gain rules and best practice guidance will be followed in full.

We raise no concerns with the baseline assessment but make the following comments regarding the delivery of post-development Biodiversity Net Gain units.

6.1.1 Biodiversity Net Gain and Delivering Biodiversity Gains

The delivery of Biodiversity Net Gain, including the delivery of a 10% net gain as defined by the Statutory Metric, should consider how best to offer genuine biodiversity uplift.

There are many ways in which this should be considered. These include delivering the right habitat in the right place, supporting local conservation priorities, a consideration for natural regeneration scrub and woodland as opposed to planting, the inclusion of additional habitats such as ponds, and a long-term commitment to replacement planting or remedial management. Additionally, where planting is undertaken not only the right species in the right location, but local provenance plants should also be considered.

The delivery of Biodiversity Net Gain must consider ways to offer additional biodiversity benefits to local priority species, including those for which compensation and enhancement has been provided. Species of note include hazel dormice and turtle dove.

While we appreciate that several of these points are considered within the supporting documents, a continued commitment to delivering the best outcomes for biodiversity, as well as Biodiversity Net Gain, would be strongly welcomed by Suffolk Wildlife Trust.

6.1.2 Delivery of Off-Site Units & the Local Nature Recovery Strategy

The Suffolk Local Nature Recovery Strategy (LNRS) was published in 2025, providing a blueprint for the delivery of habitat creation for nature recovery in Suffolk.

Suffolk Wildlife Trust strongly advocate that where any habitat is created with the aim of enhancing biodiversity that it is informed by the LNRS. This includes habitat delivered within the Draft Order Limits, National Grid landholding, or where offsite Biodiversity Units are purchased.

6.1.3 Delivery of Watercourse Units

Suffolk Wildlife Trust note that the delivery of the required watercourse units is reliant on enhancing affected watercourses[14]. This enhancement is achieved through various means including removal of invasive non-native plants, bank top planting, marginal and aquatic seeding and planting, and the removal of rubbish. Where ditches are reinstated, the measures proposed to enhance are similar, and again theoretically suitable.

However, we do highlight that delivering these measures in perpetuity, which must be the aim of this project, will require ongoing management and monitoring.

Notably, where enhancement through the removal of invasive non-native species, such as Himalayan Balsam *Impatiens glandulifera* or floating pennywort *Hydrocotyle ranunculoides* (both present within the Waveney

[14] National Grid, 2025, Norwich to Tilbury Volume 7: Other Documents, Document 7.1 Biodiversity Net Gain Report, Final Issue A August 2025, AENC-ARC-ENV-REP-0005

Valley), is proposed simply removing a species once is unlikely to see it removed permanently. Many species, including Himalayan balsam, are notoriously difficult to remove due to their presence in the seedbank and ability to recolonise from seed which is easily spread. Long-term removal may require the removal of upstream populations and frequent management visits.

Suffolk Wildlife Trust therefore seek assurances that there is an ongoing commitment to the removal of invasive non-native species in affected watercourse and ditches. We believe that this is required to fully deliver the net gain requirements of the Norwich to Tilbury Project.

If this commitment is not viable then, it is the view of Suffolk Wildlife Trust, that a contingency plan may be needed for the proposals to deliver the required watercourse units.

6.1.4 Biodiversity Net Gain and Nesting Bird Compensation

Suffolk Wildlife Trust note that within the supporting documents[2] (such as Table 8.23 of the ES) it is stated that the loss of nesting bird habitat is negated by Biodiversity Net Gain delivery. Any habitat creation or enhancement to provide compensation for a loss of nesting habitat – or other impacts to protected and priority species that would be required regardless of the requirement to deliver BNG – can only be counted up to no-net-loss within the Biodiversity Net Gain assessment.

While we agree and understand that areas of habitat creation undertaken to contribute towards the Projects Biodiversity Net Gain requirements will see nesting habitat created, this should be seen as incidental.

We therefore ask that National Grid provide suitable evidence of both mitigation and compensation in relation to how these are considered within the Biodiversity Net Gain assessment.

7 Overall Summary and Conclusions

In conclusion, Suffolk Wildlife Trust look forward to continued discussion with the Norwich to Tilbury Project Team regarding our concerns, which include:

- Concerns
    - Whether the delivery of the WaLOR project will be negatively impacted or impeded by the Norwich to Tilbury Project, including the undergrounding of existing electricity infrastructure within the Waveney Valley.
    - Whether the installation of bird diverters in the Waveney Valley between Pylons RG087 and RG088 is sufficient.
    - Impacts to three County Wildlife Sites, Thrandeston Marsh, Sproughton Park, Fore & Bushy Groves, where habitat restoration following undergrounding works are proposed
    - Potential impacts to the reptile population at Sproughton Park CWS
    - A loss of habitat and habitat connectivity in the short and medium term where hedgerow removal occurs where the route is undergrounded. This has potential to impact hazel dormice and bats, notably barbastelle bats.
    - The delivery of post-development Biodiversity Net Gain Units, notably around water courses and the use of Biodiversity Net Gain in delivering compensation habitat for nesting birds.

In addition, Suffolk Wildlife Trust make the following recommendations:

- Recommendations
    - The establishment of an Ecological Advisory Group.

- Ongoing discussion with Suffolk Wildlife Trust and the WaLOR Project Team to ensure coordination and compatibility between WaLOR and Norwich to Tilbury.
- Consideration as to whether bird diverters should be installed to the south of pylon RG088 and the River Waveney.
- Suitable post-construction monitoring of habitat restoration at CWSs.
- Monitoring during and post- construction of mitigation measures designed to retain landscape connectivity for hazel dormice and bats.
- That Biodiversity Net Gain is delivered with an emphasis on the best possible biodiversity outcomes with measures in place to secure all post-development units in perpetuity.
- That the LNRS be used to target Biodiversity Net Gain delivery.

Suffolk Wildlife Trust will continue to work with the Applicant on these concerns and seek to ensure the best possible outcomes for biodiversity and nature recovery, which can in part be delivered by following the recommendations made within our Written Representation.