

AENC-NG-CNS-REP-0103

Norwich to Tilbury

Volume 5: Reports and Statements

Document: 5.9.17 Draft Statement of Common Ground - Norfolk
Wildlife Trust - Tracked Changes Version

Final Issue B

February 2026

Planning Inspectorate Reference: EN020027

Infrastructure Planning (Applications: Prescribed Forms and Procedure)
Regulations 2009 Regulation 5(2)(g)

nationalgrid

Revision History

<u>Version</u>	<u>Date</u>	<u>Submitted at</u>
<u>A</u>	<u>29 August 2025</u>	<u>DCO Application</u>
<u>B</u>	<u>26 February 2026</u>	<u>Deadline 1</u>

Norfolk Wildlife Trust

~~Draft Stakeholder Agreement~~

~~Norwich to Tilbury~~ Statement of Common Ground

1. Purpose of the Statement of Common Ground

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

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

2. Parties to the SoCG

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

3. Background

3.1 Description of the Project/Development

The Project is a proposal by National Grid to upgrade the electricity transmission system in East Anglia between Norwich and Tilbury, comprising:

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

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

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

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

The Project ~~will~~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.

National Grid has submitted an application for development consent to the Planning Inspectorate. The Examining Authority (consisting of one or more five examining inspectors), after a period of public examination, will make their recommendation to the Secretary of State for Energy Security and Net Zero, who in turn will decide on whether development consent should be granted for the Project.

The Project is identified as critical to delivering a network which supports the clean power pathways for 2030 delivery.

The Planning Act 2008 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 and one statutory consultation to inform its proposals, with further recent targeted consultations.

4. Stakeholder Interests

Norfolk Wildlife Trust support the transition to renewable energy to mitigate the worst impacts of climate change. [Norfolk Wildlife Trust](#) understand that additional electricity transmission infrastructure is needed to facilitate the shift towards a decarbonised energy sector, however it is essential that this shift is not at the expense of wildlife, which faces an intrinsically linked and equally serious crisis. The Trust therefore support a coordinated strategic approach to the planning, design and construction of new energy infrastructure to reduce the overall negative impacts from schemes on nature and maximise potential for habitat creation and restoration to deliver environment, social and economic benefits.

Norfolk Wildlife Trust may also raise concerns or comments on additional matters pertaining to biodiversity conservation within the [development consent](#) application following sight of the Environmental Statement and throughout the process of the developing this document.

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

- 2022
 - National Grid presented information on how the Project was evolving from the evaluation of strategic options to a preliminary preferred graduated swathe within which new infrastructure (pylons and underground cables) could be located as well as a proposed new substation site on the Tendring Peninsula, as described within the [Corridor and Preliminary Routeing and Siting Study Report](#) (April 2022)
 - 21 April – 16 June non-statutory consultation. Norfolk Wildlife Trust comments included matters relating to the route selection process and a lack of appraisal of impacts on County Wildlife Sites, and Biodiversity Net Gain.
- 2023
 - Development of the 2023 Preferred Draft Alignment, responding to feedback and other studies, as described within the [Design Development Report \(June 2023\)](#)
 - 27 June – 21 August non-statutory consultation on the 2023 Preferred Draft Alignment. Norfolk Wildlife Trust comments included matters relating to impacts to the River Waveney crossing and the WaLOR project, as well as additional Biodiversity Net Gain comments.

- September - Meeting to discuss Biodiversity Net Gain – potential off-site scheme/initiatives
- 2024
 - Development of the 2024 Preferred Draft Alignment, responding to feedback and other studies, as described within the [Design Development Report \(April 2024\)](#) and [Preliminary Environmental Information Report \(PEIR\)](#) (April 2024)
 - 10 April – 26 July Statutory Consultation on the 2024 Preferred Draft Alignment: Norfolk Wildlife Trust comments included the River Waveney crossing and impacts to the WaLOR project, with additional comments on protected species, protected sites (notably Flordon Common Site of Special Scientific Interest (SSSI)), Roydon Fen LNR/CWS, and Brick Kiln Lane CWS), Biodiversity Net Gain, and more general biodiversity considerations.
- 2025
 - Development of the proposed Project Alignment prior to DCO submission, considering feedback and other studies
 - 19 May – Meeting to discuss BNG and tree planting opportunities
 - 19 June – Meeting to discuss BNG and tree planting opportunities
 - 14 July 2025- Meeting to discuss the SoCG with Essex Wildlife Trust, Suffolk Wildlife Trust and Norfolk Wildlife Trust.
 - [15 September 2025 – National Grid provided the relevant Environmental Statement documents for consideration including the Outline Landscape and Ecological Management Plan and Outline Code of Construction Practice.](#)
 - [24 September 2025 – Meeting to discuss comments and queries on the Environmental Statement with Essex Wildlife Trust, Suffolk Wildlife Trust and Norfolk Wildlife Trust.](#)
 - [3 December 2025 – Meeting to discuss BNG](#)

5. Matters Agreed

ID	Issue	Agreement reached	Date agreed	Relevant documentation
5.1	Waveney Valley Alternative	National Grid has concluded, based on its own technical assessments, that an undergrounding option that a) <i>avoids the need for open trenching through parts of the floodplain that contain peat soils that are the focus of floodplain habitat restoration proposals</i> and b) <i>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. Norfolk Wildlife Trust agree that in these circumstances an undergrounding option through the Waveney Valley in the proposed location would not be compatible with the Waveney and Little Ouse Landscape Recovery (WaLOR) Project .	24 April 2025	N/A
5.2	Collision Risk Modelling	Comments provided in response to the Statutory Consultation in July 2024: Appendix 8.5 details the results of wintering and passage bird surveys. It lists a number of 'Collision Risk Species' and provides information on numbers of individuals present. Norfolk Wildlife Trust confirmed in meeting to discuss the Statement of Common Ground on 9th December 2025 that this matter has now been agreed between both parties.	09 December 2025	N/A

Inserted Cells

1-3 Strand
London WC2N 5EH

T: +44 (0)20 7004 3000
www.nationalgrid.com

national**grid**

6. Matters currently under discussion

ID	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
6.1	<p>WelOR Project General Concerns and Commons</p> <p>Norfolk Wildlife Trust provided the following comments in their Relevant Representation dated 27 November 2025:</p> <ul style="list-style-type: none"> Norfolk Wildlife Trust seek assurances that a strict adherence to the Mitigation Hierarchy will be followed, including evidence that impacts are being avoided and enhancement is being delivered. Where mitigation, compensation, and enhancement are delivered – be it for Biodiversity Net Gain, landscape, or for targeted species – we seek to ensure the best possible outcomes for biodiversity. <p>Norfolk Wildlife Trust note that currently ecological survey data has not been provided for c. 12.5% of</p>	<p>National Grid provide the following response to Norfolk Wildlife Trust's comments raised in their Relevant Representation:</p> <ul style="list-style-type: none"> The mitigation hierarchy, as detailed in Section 7 of 5.6 Planning Statement [APP-085], has been applied throughout the routeing, siting and design process, with avoidance of impacts on biodiversity receptors prioritised wherever practicable and minimisation measures incorporated where complete avoidance is not possible. 7.4 Outline Landscape and Ecological Management Plan [AS-046] and 7.2 Outline Code of Construction Practice [APP-300] secure commitments to mitigation, compensation and enhancement, including measures for targeted species and habitats and landscape planting. 7.1 Biodiversity Net Gain 	<p>NG will continue to engage with NWT on this issue, with further information being available in the ES following its completion.</p>	N/A

Inserted Cells

Deleted Cells

Inserted Cells

<u>ID</u>	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
	<p><u>the project, and while it is not anticipated by the Project Team that this will significantly change the assessment, it may result in additional concerns for Norfolk Wildlife Trust being raised.</u></p>	<p><u>Report [APP-299] sets out the approach to delivering Biodiversity Net Gain, which includes habitat creation, enhancement and long-term management to ensure measurable benefits for biodiversity.</u></p> <ul style="list-style-type: none"> <u>The Main Works Contractor will be required to adhere to all commitments within 7.4 Outline Landscape and Ecological Management Plan (LEMP) [AS-046] and 7.2 Outline Code of Construction Practice (CoCP) [APP-300], ensuring that the mitigation hierarchy is implemented and that the best possible outcomes for biodiversity are achieved when developing the final LEMP and CoCP.</u> <p><u>Survey results from 2025 (including otter, water vole and bat roost inspections) are presented within the updated 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] which was</u></p>		

Inserted Cells

ID	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
		<p><u>submitted to the Planning Inspectorate in November 2025. Conclusions in the assessment have not changed as a result of the 2025 surveys undertaken. NWT expect evidence in the ES to demonstrate that the Norwich to Tilbury Project (with an overhead line through the Waveney Valley) and the WaLOR Project are compatible with each other and that the Project would not significantly impact on the WaLOR planned river restoration and habitat creation activities.</u></p>		
6.2	<u>WaLOR Project</u>	<p><u>Norfolk Wildlife Trust expect evidence in the ES to demonstrate that the Norwich to Tilbury Project (with an overhead line through the Waveney Valley) and the WaLOR Project are compatible with each other and that the Project would not significantly impact on the WaLOR planned river</u></p>	<p><u>National Grid will continue to engage with Norfolk Wildlife Trust on this issue.</u> <u>Meeting held between NG, Suffolk Wildlife Trust, WaLOR project and the Environment Agency to discuss the WaLOR Project and interaction with the Project. NWT to defer to WaLOR project team on the detail.</u></p>	N/A

Inserted Cells

<u>ID</u>	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
		restoration and habitat creation activities.		
6.3	County Wildlife Sites (CWSs) in Norfolk	<p>Norfolk Wildlife Trust provided the following comments in their Relevant Representation dated 27 November 2025:</p> <ul style="list-style-type: none"> NWT have concerns regarding the proposed pylon route between pylon 48 and 49 which could impact Meadow Wood Nature Reserve candidate CWS NWT surveyed this site in June 2025 and found it to meet the criteria for woodland CWS. We will be putting the site forward for designation in the 2026 CWS update As such, we are concerned about the siting of expect evidence in the ES to demonstrate how the Norwich-to-Tilbury pylon route going immediately adjacent to this particular section of woodland and the loss of the adjacent woodland habitat. We are unclear where in the 	<p>National Grid provide the following response to Norfolk Wildlife Trust's comments raised in their Relevant Representation:</p> <ul style="list-style-type: none"> The area of land indicated as being a candidate Local Wildlife Site between RG48 and RG49 in the Tas Valley, due to its woodland habitat, has been captured in our environmental assessment under the woodland ecological receptor category in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. While not considered as a Local Wildlife Site 	<p>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</p> <p>7.4 Outline Landscape and Ecological Management Plan [AS-046]</p> <p>7.2 Outline Code of Construction Practice [APP-300]</p> <p>Document reference 5.15 Design Development Report from paragraph</p>

Inserted Cells

Inserted Cells

ID	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
		<p>ES the Project has avoided and minimised impacts on <u>this location are evaluated. Given that there appear to be feasible alternatives presented in the Design Development Report, we would wish to see the relative harms of these alternative alignments explicitly weighed against each other. We take the position that the loss of this habitat and a significant number of pollards will be ecologically damaging and strongly recommend that an alternative routing in this area is sought.</u></p> <ul style="list-style-type: none"> <u>Care in selection of pylon route to avoid impacts to the richest habitat is essential. To compensate for any loss, effort to enhance the nearby CWS should be considered. Norfolk Wildlife Trust are keen to engage and discuss impacts to this CWS in more detail.</u> <p><u>We also have some concerns about impacts to Norton's Wood CWS, which</u></p>	<p><u>in the assessment, the woodland has been included as priority habitat and as such has been given significant weighting in routing design decisions. Mitigation proposals for the candidate site would relate to the impact on woodland habitat and this is clearly set out within 7.4 Outline Landscape and Ecological Management Plan [AS-046]. No compensation requirement for impacts on candidate local wildlife sites has been identified as necessary.</u></p>	<p>4.6.18 [APP-122]<u>N/A</u></p>

Inserted Cells

ID	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
		<p><u>will be 1.3 m from the temporary haul road near pylon RG19 and seek assurances that the highest standards of working practices will be followed in this area</u>CWSs in Norfolk where possible and have detailed appropriate mitigation to ensure that impacts are avoided, no long term residual effects.</p>	<ul style="list-style-type: none"> • <u>Through careful routeing and siting, including considering a number of veteran trees in the adjacent woodland (which are all avoided) the Project has avoided all direct impacts on Norton's Wood County Wildlife Site (CWS). The temporary haul road is the closest construction feature to the woodland and commitments detailed within 7.2 Outline Code of Construction Practice [APP-300] will ensure no indirect effects on the CWS occur throughout the construction period.</u> • <u>Document reference 5.15 Design</u> 	

Inserted Cells

<u>ID</u>	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
			<u>Development Report from paragraph 4.6.18 [APP-122] reports on the consideration of alternative routes including deviating more extensively to the west but found these to be less preferred due, amongst other things, to greater ecological effects. An alternative route to the east was considered, paragraph 4.4.4. but was less preferred due to greater effects on heritage and reduced proximity to the airfield. National Grid also considered localised alignment changes and can confirm that all such localised changes either impact more</u>	

Inserted Cells

ID	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
6.4	Licensable Species and Designated Sites	<p>NWT may wish to comment and engage in discussion with the applicant and Natural England on matters relating to licensable species (e.g. European Protected Species and species listed in Annex 1 of the Wildlife & Countryside Act) and designated sites, in addition to priority species and species of conservation concern.</p> <p><u>Norfolk Wildlife Trust confirmed that this matter was still under discussion in a meeting to discuss the Statement of Common Ground on 9th December 2025.</u></p>	<p><u>trees or raise broader siting questions.</u></p> <p><u>National GridNG will continue to engage with Norfolk Wildlife Trust on these issuesNWT on this issue, with further information being available in the ES following its completion.</u></p> <p><u>Chapter 8: Ecology and Biodiversity of the ES assesses the effects on protected species based on this baseline information and where/if required appropriate mitigation measures are detailed. Suitable mitigation for protected species has been developed in consultation with Natural England to ensure legal compliance and best practice</u></p>	<p><u>Chapter 8: Ecology and Biodiversity of the ES (6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]) Outline Landscape and Ecological Management Plan (LEMP)</u></p>

Inserted Cells

<u>ID</u>	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
			<p><u>guidelines are adhered to. Where necessary, draft licence applications have been drafted and the Applicant is in the process of agreeing the detail within the licence documents with Natural England, in order to obtain the relevant Letters of No Impediment (LoNI). Mitigation for non-licensable protected species has been included within the Outline Landscape and Ecological Management Plan (LEMP). NG will continue to engage with NWT on this issue, with further information being available in the ES following its completion.</u></p>	<p><u>(7.4 Outline Landscape and Ecological Management Plan [AS-046])</u>N/A</p>
6.5	BNG Offsite Solutions	National Grid have been engaging in productive discussions with NWT	National Grid has been engaging in	N/A

Inserted Cells

<u>ID</u>	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
		<p>regarding the provision of offsite Biodiversity Net Gain units for the Project. National Grid are continuing these discussions with NWT regarding securing the offsite units.</p> <p><u>Norfolk Wildlife Trust confirmed that this matter was still under discussion in a meeting to discuss the Statement of Common Ground on 9th December 2025.</u></p>	<p>productive discussions with <u>Norfolk Wildlife Trust</u> regarding the provision of offsite Biodiversity Net Gain units for the Project. National Grid are continuing these discussions with <u>Norfolk Wildlife Trust</u> regarding securing the offsite units.</p>	
<u>6.6</u>	Peat soils	<p>Comments provided in response to the Statutory Consultation in July 2024: Detailed mapping of peat soils within the river valley and robust and evidence-based proposals for compensating for any unavoidable loss of peat should be provided.</p> <p><u>Norfolk Wildlife Trust confirmed that this matter was still under discussion in a meeting to discuss the Statement of Common Ground on 9th December 2025.</u></p>	<p><u>National Grid</u> 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.</p>	<p>Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan <u>[APP-303]</u> (document reference 7.2)</p>

Inserted Cells

ID	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
6.7	Impacts on designated sites in Norfolk	<p>Comments provided in response to the Statutory Consultation in July 2024:</p> <ul style="list-style-type: none"> The Trust note that the proposed route crosses close to Flordon Common SSSI, a component of the Norfolk Valley Fens Special Area of Conservation (SAC). The SSSI and its designated features should not be impacted by the proposed works and the proposal should be able to clearly demonstrate that any adverse effects on the SAC are avoided. A robust assessment of the impacts of the route on hydrology, where indirect impacts have the potential to interfere with ground water flows and local hydrology, is required. Confirmation that no vegetation clearance within Roydon Fen is required. More information is required as to the potential effects of the Norwich to Tilbury scheme including the potential for measures to reduce river water influxes in the 	<p>Through the consideration of consultation feedback such as that provided by Norfolk Wildlife Trust and ongoing environmental and engineering studies, the Norwich to Tilbury Project has reduced impacts on CWS in Norfolk as well as SACs and SSSIs where possible and have detailed appropriate mitigation to ensure no long-term residual effects. National Grid note that the Habitats Regulation Assessment (HRA) assesses potential impact pathways. Details of the HRA can be found in the Habitat Regulations Assessment Report. National Grid has consulted with Natural</p>	<p>5.3 Habitat Regulation Assessment Report [App-082].(document reference-5.3). Section 6 Mitigation Measures, Environmental Commitments and Monitoring of the Outline Code of Construction Practice [APP-300].(document reference-7.2).</p>

Inserted Cells

ID	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
		<p>future to safeguard Roydon Fen's sensitive habitats.</p> <ul style="list-style-type: none"> The Trust notes that proposed pylon route includes a section of Brick Kiln Lane CWS within the scope of works and several other CWSs are identified as having potential indirect impacts from construction pollution. Mitigation for these impacts will be required as there should be no detrimental effect to these sites and their designated features. Norfolk Wildlife Trust confirmed that this matter was still under discussion in a meeting to discuss the Statement of Common Ground on 9th December 2025. 	<p>England on the HRA Report, and they are in agreement with the approach and conclusions reached.</p> <p>National Grid note there is no vegetation clearance proposed within Roydon Fen.</p> <p>Further details on construction impacts to water environments can be found in Section 6 Mitigation Measures, Environmental Commitments and Monitoring of the Outline Code of Construction Practice.</p>	
6.8	Biodiversity Net Gain (BNG)	<p>Comments provided in response to the Statutory Consultation in July 2024:</p> <ul style="list-style-type: none"> The project should seek to support landscape scale habitat creation and enhancement to deliver habitat 	<p>National Grid provide the following response to Norfolk Wildlife Trust's comments raised in their Relevant Representation:</p>	7.1 Biodiversity Net Gain Report [APP-

Inserted Cells

ID	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
		<p>connectivity, creating new and linking existing habitat. The trust wish to repeat the recommendations made in our previous responses in 2022 and 2023 that the scheme, if consented, should deliver 20% biodiversity net gain, given the scale of the biodiversity crisis we face and the need to move quickly towards nature's recovery.</p> <ul style="list-style-type: none"> Any habitat creation or restoration included as part of the proposal should maximise its contribution towards the restoration of ecological connectivity and delivery of the emerging Nature Recovery Network. The Trust welcome the statement that the project would seek to provide strategic habitat enhancement and creation, aiming to identify and implement opportunities to improve habitat quality and connectivity and align 	<p><u>Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG) for development (subject to certain exemptions), however, this requirement is not yet in force for development consent pursuant to a Development Consent Order (DCO). Despite submitting the development consent application before it is mandatory, National Grid has committed to delivering will deliver at least 10 % BNG with wider environmental and societal benefits for the Project. The 10 % BNG target for the Project is currently voluntary and aligned on its construction projects. Offsite BNG will be</u></p>	<p><u>299].(document reference 7.1).</u></p>

Inserted Cells

ID	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
		<p>with national nature recovery objectives and projects.</p> <ul style="list-style-type: none"> As well as a net gain across the project, offsetting should be delivered throughout Norfolk, Suffolk, and Essex. This will ensure that nature recovery is supported at a landscape scale across all three counties in which the project is proposed. <p><u>Norfolk Wildlife Trust provided the following comments in their Relevant Representation dated 27 November 2025:</u></p> <ul style="list-style-type: none"> <u>It is essential that best practice for Biodiversity Net Gain (BNG) is followed and that a strong consideration for the Local Nature Recovery Strategy is included wherever post-development Biodiversity Net Gain units are delivered; the biodiversity value of such habitat can be further enhanced by looking to create habitat of a type or in a location to</u> 	<p><u>delivered through collaboration with our corporate sustainability commitment. In the absence of guidelines for NSIPs, the approach and methodology for the BNG assessment has partners and purchased from commercially registered providers. National Grid has been agreed in principle engaging in productive discussions with Natural England Norfolk, Suffolk and Local Planning Authorities. The Essex Wildlife Trusts regarding the provision of off-site BNG rules around additionality have been applied to units for the Project. Full details are presented</u></p>	

Inserted Cells

ID	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
		<p><u>benefit key species. We acknowledge that there is currently no requirement for mandatory net gain for NSIPs, however as this project has committed to providing a 10% net gain it is important that trading rules and best practice principles are followed throughout.</u></p> <ul style="list-style-type: none"> <u>Under BNG's additionality rules, habitat measures delivered to mitigate or compensate for impacts to protected sites and species can only count towards, and not beyond, no-net-loss. To ensure additionality of the Project's 10% BNG, habitat created or enhanced to meet statutory mitigation or compensation for impacts to protected sites or species should be clearly identified in the BNG assessment</u> <u>We welcome the confirmation in Table 3.2 of Document 7.1 Biodiversity Net Gain Report that any habitat loss will only be considered temporary if</u> 	<p>National Grid will consider provision of BNG within 7.1 areas identified in Local Nature Recovery Strategy (LNRS) areas where sites are available and are appropriate to project circumstances.</p> <p>NG are continuing to work with representatives at Essex, Norfolk and Suffolk Wildlife Trusts regarding BNG and off-site requirements. Biodiversity Net Gain Report [APP-299] is not physically bound by each Local Planning Authority boundary, however, the aim is to deliver a biodiversity legacy in each of the three counties the Project crosses (Norfolk, Suffolk and Essex).</p>	

Inserted Cells

ID	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
		<p><u>reinstatement to the original habitat type and condition within two years is possible, as per statutory Biodiversity Net Gain guidance. Where this is not possible, habitat loss must be treated as permanent and its replacement required to demonstrate a minimum 10% Biodiversity Net Gain. Where temporary haul roads are made or hedgerows removed this position is essential to ensure the mitigation hierarchy is duly followed</u></p> <ul style="list-style-type: none"> <u>Norfolk Wildlife Trust confirmed that this matter was still under discussion in a meeting to discuss the Statement of Common Ground on 9th December 2025.</u> 		
6.9	Impacts on protected species	<p><u>Norfolk Wildlife Trust Comments provided the following comments in their Relevant Representation dated 27 November 2025:</u></p> <ul style="list-style-type: none"> <u>We have concerns that bat flyway crossing structures proposed at</u> 	<p><u>National Grid</u> note that the findings are included within the appendices to Environmental Statement Chapter 8: Ecology and Biodiversity. Details associated with mitigation</p>	<p><u>7.4 Section 6.1 Protected Species Mitigation of the Outline Landscape and Ecological</u></p>

Inserted Cells

ID	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
		<p><u>limited locations may be insufficient for the extent of habitat severance and efficacy of any such structures, given clear evidence demonstrating highway crossing structures do not work (e.g. on the A11).</u></p> <p><u>NWT are interested in the proposed compensation and mitigation provided response to retain hedgerow connectivity for bats. We are aware that previous research on mitigation measures in Suffolk has been undertaken as part of infrastructure works, which was shared with National Grid by Suffolk Wildlife Trust; this research highlights the need for more data and Norwich to Tilbury provides a highly suitable opportunity to provide this, adding insight into the effectiveness of mitigation measures aiming to provide temporary connectivity across hedgerows during and immediately after proposed works.</u></p> <p><u>the Statutory Consultation in July 2024.</u></p>	<p>for protected species can be found in section 6.1 Protected Species Mitigation of the Outline Landscape and Ecological Ecology Management Plan.</p> <p><u>National Grid provide the following response to Norfolk Wildlife Trust's comments raised in their Relevant Representation:</u></p> <ul style="list-style-type: none"> <u>The artificial bat flyways are proposed at key locations where the survey data have indicated a high usage feature by foraging/commuting bats, to ensure connectivity is maintained during construction. The approach to bat commuting/foraging</u> 	<p>ogy Management Plan [AS-046] (document reference 7.4).</p> <p>Environmental Statement Chapter 8: Ecology and Biodiversity [AS-046].</p>

Inserted Cells

ID	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
		<ul style="list-style-type: none"> • Norfolk Wildlife Trust confirmed that this matter was still under discussion in a meeting to discuss the Statement of Common Ground on 9th December 2025. The ES will need to demonstrate that there are no adverse impacts on bats, and the Trust recommend that construction phase impacts on connectivity between roosts and foraging areas is robustly considered. Similarly, for otter and water vole, results of the surveys are to be presented in the ES and it must be shown that there are no adverse impacts on these species. • We recommend that a robust assessment of the indirect impacts of the route on the wider landscape should also be carried out to include impacts on habitat connectivity, farmland birds, in particular any populations of turtle dove, a species at risk of being lost from the UK, but which still occurs in south Norfolk. 	<p>mitigation and the proposed locations for the bat flyways, has been agreed with the Local Planning Authorities (LPA) through consultation on 7.4 Outline Landscape and Ecological Management Plan [AS-046] as outlined within the relevant LPA Statements of Common Ground submitted at Deadline 1 [APP-089 to APP-100]. The structures proposed are effectively temporary artificial replacements of the sections of hedgerows removed and are not the same, or do not have the same purpose as the</p>	

Inserted Cells

<u>ID</u>	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
			<p><u>permanent bat bridges used for the A11. These artificial flyways have been used successfully on other DCO projects for relatively short sections of temporary impact. National Grid welcomes further discussions on the design of the proposed temporary bat flyways at the detailed design stage, beyond the principles outlined within 7.4 Outline Landscape and Ecological Management Plan [AS-046].</u></p> <p><u>There is currently no requirement to monitor the bat flyways during construction as part of this</u></p>	

Inserted Cells

<u>ID</u>	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
			Project, however National Grid is open to further conversations with Norfolk Wildlife Trust on a monitoring study sitting outside of the DCO requirement process.	
6.10	Hedgerow Loss	<p>Comments provided in response to the Statutory Consultation in July 2024: Where hedgerow removal is required, proposed mitigation should include improving the standard and design of hedgerow mitigation work, to include using species of local provenance, double planting and a long-term management plan.</p> <p>Norfolk Wildlife Trust confirmed that this matter was still under discussion in a meeting to discuss the Statement of Common Ground on 9th December 2025.</p>	<p>National Grid will continue to engage with Norfolk Wildlife Trust on this issue, with further information being available in the ES following its completion.</p> <p>National Grid confirmed that further details on Hedgerow planting is provided within Section 8 Vegetation and Removal of the Outline Landscape and Ecological Management Plan [AS-046].</p>	<p>7.4 Outline Landscape and Ecological Management Plan [AS-046]</p>

Inserted Cells

<u>ID</u>	<u>Issue</u>	<u>Norfolk Wildlife Trust's position</u>	<u>National Grid response</u>	<u>Relevant documentation</u>
6.11	<u>River Waveney Crossing</u>	<p><u>Norfolk Wildlife Trust provided the following comments in their Relevant Representation dated 27 November 2025:</u></p> <ul style="list-style-type: none"> <u>We support comments made by Suffolk Wildlife Trust regarding the River Waveney Crossing, and impacts to the Waveney and Little Ouse Landscape Recovery Project (WaLOR). The Norwich to Tilbury project should not undermine the ability of the WaLOR project to deliver significant biodiversity uplift in this area of the Waveney Valley.</u> <u>We support comments made by Suffolk Wildlife Trust regarding Roydon Fen LNR, which lies adjacent to the route, and</u> 	<p><u>National Grid provide the following response to Norfolk Wildlife Trust's comments raised in their Relevant Representation:</u></p> <ul style="list-style-type: none"> <u>The Main Works Contractor(s) would seek to engage with the WaLOR project team during detailed design development, to reduce any potential for conflicts between the two projects. National Grid is committed to ongoing collaboration with the WaLOR project team to ensure successful delivery of both projects.</u> <u>The ecological assessment at Roydon Fen identified hydrological connections as the only potential impact pathway. There would be no direct impacts on habitats within the County Wildlife Site (CWS). These potential effects are mitigated through the water-quality protection measures set out in</u> 	<p><u>Table 6.1 of 7.2 Outline Code of Construction Practice [APP-300]</u></p>

Inserted Cells

<u>ID</u>	<u>Issue</u>	<u>Norfolk Wildlife Trust's position</u>	<u>National Grid response</u>	<u>Relevant documentation</u>
		<p><u>share their concerns about the potential for impacts to the sensitive onsite hydrology and the impacts from vegetation management required for the construction and operation of overhead lines</u></p>	<p><u>commitments W01 to W16, as presented in Table 6.1 of 7.2 Outline Code of Construction Practice [APP-300]. With these mitigation measures in place, no significant residual ecological effects are anticipated on this CWS.</u></p>	
<p><u>6.12</u></p>	<p><u>Habitats of Principal Importance</u></p>	<p><u>Norfolk Wildlife Trust provided the following comments in their Relevant Representation dated 27 November 2025:</u></p> <ul style="list-style-type: none"> <u>The scheme will cause significant temporary losses of lowland mixed deciduous woodland, coastal and floodplain grazing marsh, lowland dry acid grassland, important hedgerows, and rivers. While termed 'temporary', these losses will persist for several</u> 	<p><u>National Grid provide the following response to Norfolk Wildlife Trust's comments raised in their Relevant Representation:</u></p> <ul style="list-style-type: none"> <u>All impacts to habitats would be mitigated through a combination of on-site replacement planting following completion of works and habitat creation/enhancement at the identified Environmental Areas, details of which are presented within 7.4 Outline Landscape and Ecological Management Plan [AS-046]. In addition, National Grid has committed to deliver 10 %</u> 	<p><u>7.4 Outline Landscape and Ecological Management Plan [AS-046]</u></p> <p><u>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</u></p>

Inserted Cells

<u>ID</u>	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
		<p><u>years, and full ecological restoration will take decades.</u></p>	<p><u>Biodiversity Net Gain (BNG) with wider environmental and societal benefits across the Project. The BNG metric takes account of the technical difficulties and time lag associated with specific complex habitat types including woodland, acid grassland and river habitats. The potential impacts to habitats of principal importance are assessed within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026], which concludes that following the application of mitigation, the impact to habitats of principal importance would be negligible and there would be no significant residual effect.</u></p>	
<p>Collision Risk Modelling</p>	<p><u>Ancient Woodlands</u> <u>Norfolk Wildlife Trust provided the following comments in their Relevant Representation dated 27 November 2025:</u></p>	<p>Comments provided in response to the Statutory Consultation in July 2024:- Appendix 8.5 details the results of wintering and passage bird surveys. It lists a number of 'Collision Risk</p>	<p>7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran</p>	<p>N/A</p>

Inserted Cells

Deleted Cells

Inserted Cells

Inserted Cells

ID	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
	<ul style="list-style-type: none"> <u>We support comments made by Essex Wildlife Trust regarding Ancient woodlands, which are irreplaceable habitats. The scheme identifies 6 ancient woodland sites (1.7 ha) within the Order Limits and 34 ancient woodland sites within the 15m root protection zone buffer. Additionally, 112 veteran trees have been surveyed with 4 requiring removal.</u> <p>Norfolk Wildlife support all other comments made by Essex Wildlife Trust and Suffolk Wildlife Trust.</p>	<p>Species' and provides information on numbers of individuals present.</p> <p>National Grid provide the following response to Norfolk Wildlife Trust's comments raised in their Relevant Representation:</p> <ul style="list-style-type: none"> Although unavoidable, the impacts to the ancient woodlands within Norfolk are minimal and appropriate mitigation has been provided to ensure no long-term impacts. A full breakdown of the impacts to each ancient woodland and a site-specific mitigation/ compensation solution has been provided within <u>7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]</u>. <p>Section 8.2.3 of <u>7.4 Outline Landscape and Ecological Management Plan [AS-46]</u> confirms that following detailed design and prior to construction, relevant surveys would</p>	<p><u>Tree Strategy [APP-323]</u></p> <p><u>7.4 Outline Landscape and Ecological Management Plan [AS-46]</u></p> <p><u>7.2 Outline Code of Construction Practice [APP-300]</u> NG will continue to engage with NWT on this issue, with further information being available in the ES following its completion.</p>	

Inserted Cells

ID	Issue	Norfolk Wildlife Trust's position	National Grid response	Relevant documentation
		<p><u>be undertaken to reduce removal of trees/hedgerows (this includes the four veteran trees) as far as practicable and will take further account of tree canopies and overall tree size. This is also recorded as Commitment reference GG14 in the Outline Code of Construction Practice (7.2 Outline Code of Construction Practice [APP-300]). However, there is no interpretation of these data or any collision risk modelling to provide information on the actual likelihood of collision. We request that this information is provided.</u></p>		

Inserted Cells

7. Signatures

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

For National Grid

Name: _____

Position: _____

Date: _____

For Norfolk Wildlife Trust

Name: _____

Position: _____

Date: _____

National Grid plc
National Grid House,
Warwick Technology Park,
Gallows Hill, Warwick.
CV34 6DA United Kingdom

Registered in England and Wales
No. 4031152
nationalgrid.com