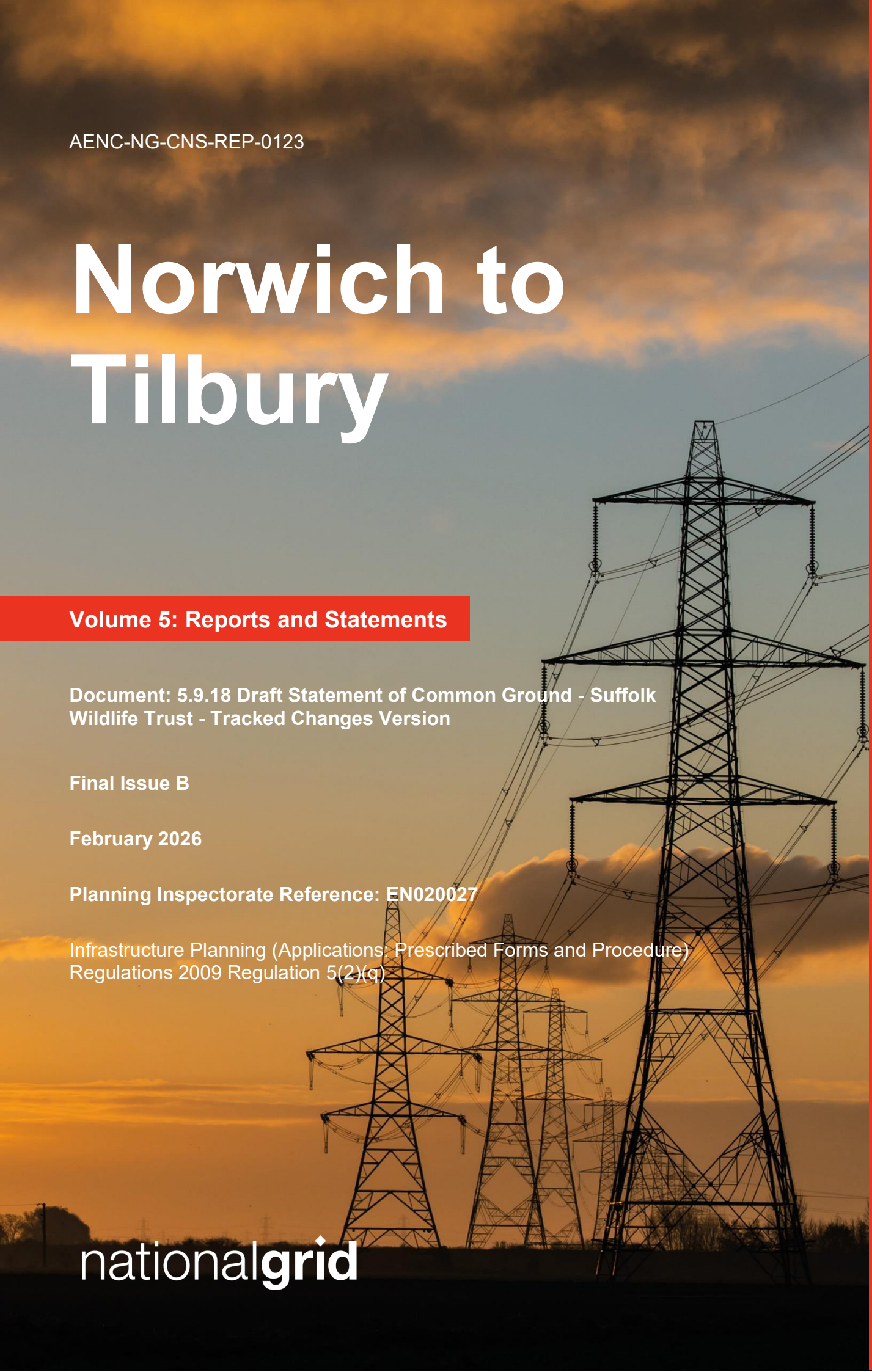
AENC-NG-CNS-REP-0123

Norwich to Tilbury



Volume 5: Reports and Statements

Document: 5.9.18 Draft Statement of Common Ground - Suffolk Wildlife Trust - Tracked Changes Version

Final Issue B

February 2026

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Revision History

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

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Suffolk Wildlife Trust
Draft ~~Stakeholder Agreement~~ ~~Norwich to Tilbury~~ Statement of Common Ground

1. Purpose of the Statement of Common Ground

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

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

2. Parties to the SoCG

This draft SoCG is agreed between National Grid and the Suffolk Wildlife Trust (the Stakeholder).

3. Background

3.1 Description of the Project/Development

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

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

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  - Approximately 21 km of 400 kV underground cabling, some of which would be located through the Dedham Vale National Landscape (an Area of Outstanding Natural Beauty (AONB1).)

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

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

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

The Project would be designed, constructed and operated in accordance with applicable health and safety legislation. The Project will need to comply with design safety standards including the Security and Quality of Supply Standard (SQSS), which sets out the criteria and methodology for planning and operating the National Electricity Transmission System (NETS). This informs a suite of National Grid policies and processes, which contain details on design standards required to be met when designing, constructing and operating assets such as those proposed for the Project.

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

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4. Stakeholder Interests

Suffolk Wildlife Trust supports the transition to renewable energy to mitigate the worst impacts of climate change, which threatens wildlife as well as people and recognise the need for new electricity transmission infrastructure to facilitate to renewable and low-carbon electricity generation and supply in the UK. It is vital though that new electricity transmission infrastructure to facilitate the decarbonisation of the energy sector does not compromise society's ability to address the equally important crisis of biodiversity loss or undermine the delivery of nature-based solutions to climate change. For Norwich to Tilbury this means in particular that:

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

Suffolk Wildlife Trust's interests also include;

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

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

Suffolk Wildlife Trust has engaged with National Grid and their ecological consultants regarding the Project during the pre-application process, resulting in changes to the scheme to avoid and reduce impacts to ecological receptors following our responses to pre-application consultations and further discussions with the Project team. Suffolk Wildlife Trust seek to continue this constructive engagement through the development consent process to minimise as far as possible any negative ecological impacts and optimise mitigation, compensation, and enhancement to deliver meaningful biodiversity and environmental gains.

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

- 2022
  - National Grid presented information on how the Project was evolving from the evaluation of strategic options to a preliminary preferred graduated swathe within which new infrastructure (pylons and underground cables) could be located as well as a proposed

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new substation site on the Tendring Peninsula, as described within the Corridor and Preliminary Routeing and Siting Study Report (April 2022)

  - 21 April - 16 June non-statutory consultation: Suffolk Wildlife Trust comments included matters relating to the route selection process, protected sites in the Waveney Valley, bird collision risk, County Wildlife Sites, Priority Habitats, Network Expansion Zones, undergrounding impacts in Dedham Vale National Landscape, and Biodiversity Net Gain.

- 2023
  - Development of the 2023 Preferred Draft Alignment, responding to feedback and other studies, as described within the Design Development Report (June 2023)
  - 27 June - 21 August non-statutory consultation on the 2023 Preferred Draft Alignment: Suffolk Wildlife Trust comments included matters relating to impacts to the WaLOR project, Dedham Vale National Landscape, and the River Gipping CWS and Sproughton Park CWS, as well as additional Biodiversity Net Gain comments.
  - August - Meeting to discuss Biodiversity Net Gain - potential off-site scheme/initiatives
- 2024
  - Development of the 2024 Preferred Draft Alignment, responding to feedback and other studies as described within the Design Development Report (April 2024) and Preliminary Environmental Information Report (PEIR) (April 2024).
  - 10 April - 26 July Statutory Consultation on the 2024 Preferred Draft Alignment: Suffolk Wildlife Trust comments included the River Waveney crossing and impacts to the WaLOR project, with additional comments on protected species, protected sites, the crossing of the Dedham Vale National Landscape, Biodiversity Net Gain, and more general biodiversity considerations.
  - 17 March meeting between National Grid and Suffolk Wildlife Trust to discuss the Waveney and Little Ouse Landscape (WALOR) Recovery project area
  - 11 November meeting between National Grid and Suffolk Wildlife Trust to discuss BNG-related matters
- 2025
  - Development of the proposed Project Alignment prior to DCO submission, considering feedback and other studies
  - 30 January - 3 March Consultation for Suffolk on proposed changes to the underground cable alignment: Suffolk Wildlife Trust comments included the Waveney crossing pylon location and the proposed undergrounding of an existing overhead lines (OHL) at Thrandeston Marsh CWS.
  - 11 March - Meeting to discuss BNG and WaLOR project in relation to the Project
  - 24 April - Meeting between National Grid and Suffolk Wildlife Trust and WALOR to discuss offsite BNG and tree planting

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- 10 July - Meeting between National Grid and Suffolk Wildlife Trust and WALOR to discuss offsite BNG
- 14 July 2025- Meeting to discuss the SoCG with Essex Wildlife Trust, Suffolk Wildlife Trust and Norfolk Wildlife Trust.
- 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.
- 11 November 2025 – Meeting between National Grid and Suffolk Wildlife Trust and WALOR to discuss offsite BNG
- 9 December 2025 – Meeting to discuss the Statement of Common Ground with Essex Wildlife Trust, Suffolk Wildlife Trust and Norfolk Wildlife Trust.
- 6 January 2026 – Meeting to discuss the WaLOR project with Suffolk Wildlife Trust and Environment Agency.
- 13 January 2026 – Meeting between National Grid and Suffolk Wildlife Trust and WALOR to discuss offsite BNG

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5. Matters Agreed

ID	Issue	Agreement Reached	Date agreed	Relevant documentation
5.1	Waveney Valley Alternative	National Grid has~~have~~ concluded, based on its own technical assessments, that an undergrounding option that *a) avoids the need for open trenching through parts of the floodplain that contain peat soils that are the focus of floodplain habitat restoration proposals* and *b) achieves sufficient buried cable depth to prevent potential issues for proposed stage zero river restoration and restoration of floodplain wetland habitats* is not achievable. SWT agree that in these circumstances an undergrounding option through the Waveney Valley in the proposed location would not be compatible with the WaLOR Project.	24/04/2025	N/A

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6. Matters Currently Under Discussion

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
6.1	WaLOR Project	Comments provided as part of the Relevant Representation submitted in November 2025: • SWT identify~~expect evidence in the ES to demonstrate~~ that there is the potential for	• National Grid is committed to continuing to collaborate with the WaLOR project to ensure both projects can be successfully delivered.	**Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**

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ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		the~~Norwich to Tilbury~~ Project to impact~~(with an overhead line through~~ the Waveney ~~Valley)~~ and Little Ouse Landscape Recovery~~the WaLOR~~ Project (WaLOR) and the delivery of its vision for nature recovery in the wider Upper Waveney Valley in which Suffolk Wildlife Trust is the lead partner alongside the Environment Agency and 15~~are compatible with each~~ other landowners. • SWT note that a key component of ~~and that the Project would not significantly impact on~~ the WaLOR project is the restoration of the section of the River Waveney and its floodplain crossed by the Project to a more natural course and function. They note that it is imperative that not only pylon location, but any permanent or temporary access required at construction or operational stage, will not	• National Grid has sought to minimise impacts on the Waveney and Little Ouse Landscape Recovery (WaLOR) project as far as practicable. The construction haul road has been removed between pylons RG87–88. The permanent access is a right of access only for ongoing maintenance, i.e. no physical permanent works are required and impacts on the WaLOR project would be minimal. • National Grid is committed to ongoing collaboration with the WaLOR project team and 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. • The Project has included bird diverters at the Waveney Valley on a precautionary basis,	**Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]** **Environmental Statement Chapter 13 – Landscape and Visual [APP-226]** **Outline Landscape and Ecological Management Plan [AS-046]**

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ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		impact the ~~planned river restoration and~~ habitat restoration and creation proposals of the WaLOR project, including the river restoration, and that the design, construction, and operation of the Norwich to Tilbury project is compatible with the restoration of natural processes in the river valley, which include the natural migration of the river channel. • SWT note that the construction of temporary haul roads and provision of permanent access required for the operational lifetime of the Project could impact habitat creation (outside of that proposed for the river channel) undertaken as part of the WaLOR project, including impacts to habitats where biodiversity, carbon, or other environmental credits have been, or would be, created. • The potential for bird strike in the upper Waveney Valley	acknowledging that the proposed WaLOR proposals would likely increase the area's value for wintering birds. The inclusion of bird diverters is considered sufficient mitigation for any potential future increase in value and would mitigate any concern over collision risk. Landscape mitigation is set out in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. There are no proposals to underground existing 132 kV overhead lines in the Waveney Valley. Short sections of existing 11 kV and 33 kV wood pole lines would be removed to accommodate the Project and undergrounded as shown on **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]** pages 10 and 11. Undergrounding works will be minimal and have limited short term impacts on habitats in the	

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ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		where, as part of the WaLOR project there are proposed works to increase biodiversity value for birds moving up and down the river valley. Should future monitoring indicate that bird diverters proposed as mitigation are insufficient to prevent significant impacts on local bird populations from collision with pylons and overhead lines, there should be a commitment from National Grid to provide suitable compensation and additional mitigation measures. Where undergrounding of existing 132kV overhead lines is being considered in the Waveney Valley, it must avoid impacts to ecologically valuable habitats, peat soils, and the delivery of the WaLOR project, including river and floodplain restoration~~activities~~.	Waveney Valley. Reinstatement of vegetation is set out in the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. ~~NG will continue to engage with SWT on this issue, with further information being available in the ES following its completion.~~	

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ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
6.2	County Wildlife Sites (CWSs) in Suffolk	Comments provided as part of the Relevant Representation submitted in November 2025 • SWT have concerns regarding the proposals at Sproughton Park CWS and the onsite reptile population which could be directly impacted during both pylon construction and the undergrounding of existing overhead lines. The undergrounding also crosses the entirety of the site, which has the potential to sever the population, potentially isolating individuals from hibernacula or impacting the short-term breeding success. • Where impacts to CWS are unavoidable, care in 'micro-siting' of cable route to prevent impacts to the most ecologically important habitat is needed together with well-designed and executed habitat restoration works; these should aim to	• Sproughton Park County Wildlife Site (CWS) was surveyed for reptiles and subsequently identified as a key reptile site within **6.8.A6 Environmental Statement Appendix 8.6 - Reptile Report [APP-164]**. The **7.4 Outline Landscape and Ecological Management Plan [AS-046]** already sets out mitigation measures for reptiles at key reptile sites and this includes Sproughton Park CWS. The impacts associated with the 132 kV undergrounding would be relatively short-term and small scale. All impacts would be temporary and habitats will be returned to baseline conditions on completion and would be available for reptiles in the medium to long term. • National Grid is committed to avoiding and minimising impacts to important ecological features, including CWSs,	Outline Landscape and **Ecological**~~Ecology~~ Management Plan **[APP-046]**~~(document reference 7.4).~~ Environmental Statement Chapter 8: Ecology and Biodiversity **[AS-026]** **Outline Code of Construction Practice [APP-300]** **Biodiversity Net Gain Report [APP-299]** **Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**

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ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		deliver habitats to the same or better condition. To compensate for any loss, be it considered temporary or not, measures should seek to enhance the wider CWS for its designated features and other nature conservation priorities as appropriate. Roydon Fen Local Nature Reserve and CWS lies adjacent to the route, and we continue to have concerns about the potential for impacts to the sensitive onsite hydrology from works in the adjacent floodplain, as well as the impacts from vegetation management required for the construction and operation of overhead lines. (see also comments below on River Waveney Crossing).~~SWT expect evidence in the ES to demonstrate how the Norwich to Tilbury Project has avoided and minimised impacts on CWSs in Suffolk where possible and have detailed~~	wherever practicable. The detailed design stage would include micro-siting to ensure avoidance of key areas of ecological value where practicable in line with commitments made within the **7.2 Outline Code of Construction Practice [APP-300]**. Habitats would be returned to existing baseline value and condition, unless identified within the **7.1 Biodiversity Net Gain Report [APP-299]),** with additional enhancement measures proposed. Details will be included within a final Landscape and Ecological Management Plan. • National Grid has assessed the potential hydrological impacts of the Project on Roydon Fen Local Nature Reserve and CWS in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity**	**Environmental Statement Chapter 12 - Hydrology, Land Drainage and Flood Risk [APP-221]**~~.~~

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ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		~~appropriate mitigation to ensure no long-term residual effects. CWSs in proximity to the Project include Roydon Fen and Mellis Common, with Bonny Wood slightly more distant at just over 500 m from the red line boundary.~~	**[AS-026]** and **6.12 Environmental Statement Chapter 12 - Hydrology, Land Drainage and Flood Risk [APP-221]**, and has secured a range of measures, detailed in the **7.2 Outline Code of Construction Practice [APP-300]**, to maintain and safeguard the hydrology and water quality of the River Waveney and associated habitats. Through the consideration of consultation feedback such as that provided by Suffolk Wildlife Trust and ongoing environmental and engineering studies, the Norwich to Tilbury Project has reduced impacts on CWSs where possible and have detailed appropriate mitigation to ensure no long-term residual effects.~~NG will continue to engage with SWT on this issue, with further information being available in the ES following its completion.Details associated with mitigation for designated sites can~~	

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ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			~~be found in section 6.1 Protected Species Mitigation of the Outline Landscape and Ecology Management Plan.~~	
6.3	Licensable Species and Designated Sites	SWT may wish to comment and engage in discussion with the applicant and Natural England on matters relating to licensable species (e.g. European Protected Species and species listed in Annex 1 of the Wildlife & Countryside Act) and designated sites, in addition to priority species and species of conservation concern.	National Grid~~NG~~ will continue to engage with Suffolk Wildlife Trust~~SWT~~ on this matter. Draft licence applications are currently being agreed with Natural England~~issue~~.	N/A
6.4	Biodiversity Net Gain (BNG) Offsite Solutions	National Grid has~~have~~ been engaging in productive discussions with SWT regarding the provision of offsite Biodiversity Net Gain units for the Project. National Grid are continuing these discussions with SWT regarding securing the offsite units.	National Grid has~~have~~ been engaging in productive discussions with Suffolk Wildlife Trust~~SWT~~ regarding the provision of offsite BNG~~Biodiversity Net Gain~~ units for the Project. National Grid are continuing these discussions with Suffolk Wildlife Trust~~SWT~~ regarding securing the offsite units.	N/A

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ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
6.5	Peat soils	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.	National Grid~~NG~~ conducted more detailed peat surveys in the Waveney Valley in late 2024 and determined that organic-rich (peaty) soils were present. Additional mitigation measures for the handling of organic-rich soils have been included in the Outline Soil Resource Plan.	Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan **[APP-303]**~~(document reference 7.2)~~
6.6	Waveney Valley - vegetation clearance	Comments provided in response to the Statutory Consultation in July 2024: • The Trust seek written clarification on the extent and nature of vegetation clearance required within and either side of the working width for the construction of the Waveney Valley crossing section of the scheme and extend this to within all areas in the WaLOR Project outside the floodplain where scrub and transitional woodland habitats are proposed.	National Grid~~NG~~ note that the full 100 m width includes the limit of deviation for the overhead route and therefore vegetation within the full extent of the 100 m swathe would not be removed in its entirety. National Grid~~NG~~ will seek to reduce the vegetation impact at detailed design.	**Outline Code of Construction Practice [APP-300]** **Outline Landscape and Ecological Management Plan [APP-046]**~~N/A~~

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ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
6.7	Biodiversity Net Gain (BNG)	Comments provided in response to the Statutory Consultation in July 2024: • The Trust encourage National Grid to go beyond the 10% commitment and deliver at least 20% net gain across hedgerows and watercourses as well as the area habitats already considered. • The Trust note that in addition to net gain across the project, offsetting should be delivered throughout Norfolk, Suffolk, and Essex to ensure that nature recovery is supported at a landscape scale across all three counties in which the project is proposed. Comments provided as part of the Relevant Representation submitted in November 2025: • It is essential that best practice for Biodiversity Net Gain (BNG) is followed and that a strong consideration for the Local	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 10 % BNG with wider environmental and societal benefits for the Project. The 10 % BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. In the absence of guidelines for NSIPs, the approach and methodology for the BNG assessment has been broadly agreed in principle with Natural England and Local Planning Authorities. National Grid will consider provision of BNG within areas	Biodiversity Net Gain Report **[APP-299]**~~(document reference 7.1)~~

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		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 benefit key species, such as hazel dormice. 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 • 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	identified in Local Nature Recovery Strategy (LNRS) areas where sites are available and appropriate to project circumstances as part of the site selection process. The BNG rules around additionality have been applied to the Project. Full details are presented within **7.1 Biodiversity Net Gain Report [APP-299]**. ~~National Grid will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. Offsite BNG will be delivered through collaboration with partners and purchased from commercially registered providers. National Grid has been engaging in productive discussions with Norfolk, Suffolk and Essex Wildlife Trusts regarding the provision of off-site BNG units for the Project.~~	

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		enhanced to meet statutory mitigation or compensation for impacts to protected sites or species should be clearly identified in the BNG assessment. • SWT 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 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.		

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6.8	WaLOR Project and Biodiversity Net Gain (BNG)	Comments provided in response to the Statutory Consultation in July 2024: • The Trust has concerns regarding the effects of both the proposed pylon route and the Waveney Valley Alternative on habitat creation and natural riverine and flood plain processes. The creation of Biodiversity Units through habitat creation and enhancement is central to the viability of the WaLOR project and the Trust seek reassurances that we will be consulted regarding how the BNG assessment for the scheme is undertaken at the River Waveney crossing. • The Trust welcome a comparison of Metric calculations for crossing options for the Waveney Valley, which should consider the current baseline and baseline	Conversations with Suffolk Wildlife Trust~~SWT~~ are ongoing regarding the WaLOR Project and BNG. All habitats within the Order Limits are considered as part of the BNG metric with the Project committing to deliver at least 10% BNG with wider environmental and societal benefits. Post-development habitats would ensure all trading rules are satisfied. National Grid has sought to minimise impacts on the Waveney and Little Ouse Landscape Recovery (WaLOR) project as far as practicable. The Waveney Alternative (undergrounding) is not being progressed due in part to the impact on the WaLOR and does not form part of the development consent. The construction haul road has been removed between pylons RG87–88 to reduce impacts on the wetland habitats and the WaLOR. The permanent access is a right of access only for ongoing maintenance, i.e. no physical	Biodiversity Net Gain Report **[APP-299]** **Environmental Statement Figure 4**~~(document reference 7~~.1 **– Proposed Project Design [APP-133]** **Environmental Statement Figure 4.2 – Proposed Project Design – Permanent features [APP-134]** **Outline Landscape and Ecological Management Plan [AS-046].**~~)~~

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ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		at time of construction should habitat changes as part of the WaLOR project taking place prior to works. • Further clarification is needed on how the project BNG Assessment and the Habitat Units created within the Red Line boundary as part of the WaLOR project will interact	permanent works are required and impacts on the WaLOR project would be minimal. Full details are presented in the Outline Landscape and Ecological Management Plan [AS-046].	
6.9	Thrandeston Marsh	~~County Wildlife Sites~~SWT has expressed concerns regarding the impact on Thrandeston Marsh of proposed undergrounding of existing 132 kV overhead line through the County Wildlife Site. Comments provided as part of	The **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** sets on the principle that all habitats temporarily affected, including those located within a CWS, will be returned to the baseline habitat type and condition on completion of works. Habitat enhancement measures to improve the habitat condition for certain habitat types within the Order Limits, have been identified where achievable as set out within the **7.1 Biodiversity Net Gain Report [APP-299]).** Section 11.4 of the **7.4 Outline Landscape**	~~Through the consideration of consultation feedback such as that provided by SWT and ongoing environmental and engineering studies, the Norwich to Tilbury Project has reduced impacts on CWSs where possible and have detailed appropriate mitigation to ensure no long-term residual effects.~~	**Environmental Statement** Chapter 8 **-** ~~(~~Ecology and Biodiversity **[AS-026].** **Biodiversity Net Gain Report [APP-299]** **Outline Landscape and Ecological Management Plan [AS-046]** **Outline Code**~~)~~ of **Construction**

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	the Relevant Representation submitted in November 2025: • Onsite habitats aim should be to improve habitat value and condition, with a restoration to previous condition the minimum required (as it put forward within the Environmental Statement). Regular monitoring should be undertaken to ensure that habitat restoration is on track, with	**and Ecological Management Plan [AS-046]** prescribes regular monitoring over a five-year period for designated sites which would include Sproughton Park CWS, Fore and Bushey Groves CWS and ~~Comments provided in response to the Statutory Consultation in November 2024:~~ ~~• The Trust has concerns regarding potential impacts to some County Wildlife Sites which lie within the Draft Order Limits; these include, but are not limited to, the direct and indirect impacts to Sproughton Park, River Gipping (Sections), River Waveney (Sections), Fore and Bushy Groves, Great Newton Wood, Round Wood and Elms grove, and Millers Wood CWSs as well as Roadside Nature Reserve 200.~~ ~~The Trust note Pylon JC015 lies wholly within Sproughton Park CWS; this pylon should be moved north to avoid this impact, or clear~~		**Practice [APP-300]**~~the ES (Document reference 6.8)~~

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	the potential for additional intervention or changes to prescribed management on the table if required. Where impacts to CWS are unavoidable, care in 'micro-siting' of cable route to prevent impacts to the most ecologically important habitat is needed together with well-designed and executed habitat restoration works; these should aim to deliver habitats to the same or better condition. To compensate for	~~reasons why it must be located within the CWS provided.~~ Thrandeston Marsh CWS. This section of the Outline Landscape and Ecological Management Plan [AS-046] also includes adaptive measures to ensure habitats are returned to their target type and condition. • National Grid is committed to avoiding and minimising impacts to important ecological features, including CWSs, wherever practicable. The detailed design stage would include micro-siting to ensure avoidance of key areas of ecological value where practicable in line with commitments made within the **7.2 Outline Code of Construction Practice [APP-300]**. Habitats would be returned to existing baseline value and condition, unless identified within the **7.1 Biodiversity Net Gain Report**		

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	any loss, be it considered temporary or not, measures should seek to enhance the wider CWS for its designated features and other nature conservation priorities as appropriate	**[APP-299]),** with additional enhancement measures proposed. Details will be included within a final Landscape and Ecological Management Plan.		
~~Thrandeston Marsh~~6.10	Air Quality	~~SWT has expressed concerns regarding the impact on Thrandeston Marsh of proposed undergrounding of existing 132 kV overhead line through the County Wildlife Site.~~Comments provided in response to the Statutory Consultation in July 2024: At receptor ER_17, there is an increase in nitrogen deposition, with the impact being less than 1% of the relevant lower critical load and therefore considered to be not significant. The Trust urge caution	A construction dust assessment and an assessment of construction traffic emissions is presented in the ES to determine any changes in air quality arising from construction phase. ~~Any impacts on Thrandeston Marsh would be assessed as part of Chapter 8 (Ecology and Biodiversity) of the ES. With appropriate mitigation measures in place, NG do not anticipate any long-term residual effects.~~The ES also recommends good practice to mitigate the impact of the Project on air quality.	**Environmental Statement Chapter 7:** ~~Chapter 8 (Ecology and Biodiversity) of the ES Document reference 6.8).~~Air Quality **[APP-147]** **Environmental Statement Chapter 17: Cumulative Effects [APP-281]**

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		in this assessment and seek clarity that in-combination impacts from any other projects assessed as being impacts.	The ES clarifies the approach to assessing in combination / cumulative effects and the cumulative assessment concludes that the inter-project assessment for air quality would have negligible and not significant inter-project effects on air quality receptors within the areas surrounding the Project, during both construction and operation (and maintenance).	
~~Air Quality~~6.11	Hydrology	Comments provided as part~~in response to the Statutory Consultation in July 2024:~~ ~~At receptor ER_17, there is an increase in Nitrogen deposition, with the impact being less than 1%~~ of the relevant Representation submitted in November 2025: • Any proposals to underground existing 132kV OHLs must adequately assess and mitigate the risk of groundwater and surface water pollution, and any potentially adverse hydrological effects on the River Waveney	~~NG note that a construction dust assessment and an assessment of construction traffic emissions is presented in the ES, to determine any changes in air quality arising from construction phase. The ES also recommends good practice to mitigate the impact of the Project on air quality.~~ Following completion of ground investigation to inform the detailed design of the undergrounding works, if dewatering is anticipated for any locations within open cut trenches, a Hydrogeological Risk Assessment would be undertaken,	**Outline Code of Construction Practice [APP-300]**~~Environmental Statement Chapter 7: Air Quality (document reference 6.7).~~

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		and sensitive wetland habitats, including designated wildlife sites such as Roydon Fen. ~~lower critical load and therefore considered to be not significant. The Trust urge caution in this assessment and seek clarity that in-combination impacts from any other projects assessed as being impacts.~~	in accordance with commitment GH11 within the **Outline Code of Construction Practice [APP-300]**. The assessment would consider the specific risks to groundwater and water environment receptors at those locations and identify any additional mitigation that may be required, the nature and scope of which will be agreed with the Environment Agency or other stakeholders, as appropriate. ~~The ES clarifies the approach to assessing in combination / cumulative effects.~~	
6.12	Mitigation Hierarchy	Comments provided in response to the Statutory Consultation in July 2024: • The Trust re-iterate BMSDC comments and seek reassurance that the mitigation hierarchy will be rigorously applied to avoid impacts before the consideration of mitigation and compensation.	• 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	Environmental Statement Chapter 8: Ecology and Biodiversity (document reference 6.8) – Section 8.6 **Planning Statement [APP_085]**.

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		Comments provided as part of the Relevant Representations submitted in November 2025: • Suffolk Wildlife Trust continue to 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.	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 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. 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	

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			mitigation hierarchy is implemented and that the best possible outcomes for biodiversity are achieved when developing the final LEMP and CoCP.~~The mitigation hierarchy has been considered in Section 8.6 of Environmental Statement Chapter 8: Ecology and Biodiversity.~~ ~~The Project has considered opportunities to enhance ecosystem services and natural capital within the design following the mitigation hierarchy to avoid and minimise effects to biodiversity receptors. Where effects to biodiversity receptors are unavoidable, the design incorporates appropriate mitigation and/or compensation measures. The Project assesses effects on the biodiversity receptors within the ES (Volume 6 of the DCO application) and includes justification of any residual effects.~~	

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6.13	Hedgerow Loss	Concern regarding direct habitat loss and temporary loss of connectivity. Impacts to farmland birds (loss of foraging and nesting habitat), hazel dormice (loss of habitat), and bats (esp. barbastelle) (loss of connecting habitat). Additionally, we note that defining this loss of connectivity as temporary fails to consider that the typical time for re-establishment is 4-5 years, the average lifespan of a hazel dormice. The time taken for a replanted hedgerow to achieve equivalent ecological value to a removed ancient or long-existing hedgerow could be significantly longer than this. Comments provided as part of the Relevant Representations submitted in November 2025: • Where dormice habitat, notably hedgerow habitat, is removed as part of works (notably for the undergrounded section through	National Grid~~NG~~ will continue to engage with Suffolk Wildlife Trust~~SWT~~ on this issue. • 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 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	**Outline Landscape and Ecological Management Plan [AS-046]** **Outline Landscape and Ecological Management Plan [AS-046]**

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		Dedham Vale National Landscape), any required mitigation to retain connectivity for dormice should be monitored to assess its effectiveness. We believe this should be strengthened by including monitoring to assess presence/ absence in the wider landscape (offering clarity if monitoring shows a lack of use of mitigation). SWT are interested in the proposed mitigation measures to retain hedgerow connectivity for bats. Previous research on mitigation measures in Suffolk has been undertaken as part of infrastructure works, this has been shared with National Grid by SWT; 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	not the same, or do not have the same purpose as the 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].** • There is currently no requirement to monitor the bat flyways during construction as part of this Project. A draft dormouse licence has been prepared and issued to Natural England for review. National Grid is working with Natural England to agree upon necessary dormouse	

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		across hedgerows during and immediately after proposed works	mitigation and expect to receive a Letter of No Impediment during the examination phase. Due to the small scale of impact on any of the dormouse sites, it is not expected that this would include the requirement for any ongoing dormouse monitoring, however this will be agreed with Natural England as part of the draft licence process~~information being available in the ES following its completion~~.	
6.14	Dedham Vale National Landscape	An important area for wildlife including hazel dormice and bats. The proposed change from Overhead Line (OHL) to underground occurs near to Raydon Great Wood and a linear belt of habitat both of which are suitable habitat for dormice. The use of trenching and Horizontal Directional Drilling (HDD) in Dedham Vale National Landscape will see increased hedgerow losses – issue covered above.	• No positive dormouse sites were identified through surveys, within any of the areas of proposed undergrounding. All positive dormouse sites were in areas of proposed 400 kV overhead line and therefore hedgerow impact is minimal. A draft dormouse licence has been prepared and issued to Natural England for review. National Grid is working with Natural England to agree upon necessary dormouse mitigation and expect to receive a	

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		Comments provided as part of the Relevant Representations submitted in November 2025: Where dormice habitat, notably hedgerow habitat, is removed as part of works (notably for the undergrounded section through Dedham Vale National Landscape), any required mitigation to retain connectivity for dormice should be monitored to assess its effectiveness. We believe this should be strengthened by including monitoring to assess presence/ absence in the wider landscape (offering clarity if monitoring shows a lack of use of mitigation)	Letter of No Impediment during the examination phase. Due to the small scale of impact on any of the dormouse sites, it is not expected that this would include the requirement for any ongoing dormouse monitoring, however this will be agreed with Natural England as part of the draft licence process.~~NG will continue to engage with SWT on this issue, with further information being available in the ES following its completion.~~	

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7. Signatures

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

For National Grid

Name: _____

Position: _____

Date: _____

For Suffolk Wildlife Trust

Name: _____

Position: _____

Date: _____

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