

Date: 26 February 2026
Our ref: 531193
Your ref: EN020027



The Planning Inspectorate,
3 Kite Wing, Temple Quay House,
2 The Square,
Bristol
BS1 6PN

By email only: NorwichToTilbury@planninginspectorate.gov.uk

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir/Madam,

NATIONAL GRID (NORWICH TO TILBURY) DEVELOPMENT CONSENT ORDER (APPLICATION REFERENCE: EN020027)

Interested Party Reference number: F86C8A17D

Thank you for your consultation on the above dated 17 February 2026 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Written Representation

PART I: Summary of Natural England's advice.

Natural England has no fundamental objection to the proposal but seeks further reassurance in relation to impacts on National Landscapes and is continuing engagement with the developer in relation to a small number of environmental issues with the aim of agreeing a statement of common ground.

PART II: Annexes including Natural England's evidence

Content

Part 1 – Introduction

Part 2 – Conservation Interests

Annexes

PART 1 INTRODUCTION

1.1. Purpose and structure of these representations

- 1.1.1. These Written Representations are submitted in pursuance of rule 10(1) of the Infrastructure Planning (Examination Procedure) Rules 2010 ('ExPR') in relation to an application under the Planning Act 2008 for a Development Consent Order ('DCO') for Norwich to Tilbury ('the Project') submitted by National Grid Electricity Transmission ('the Applicant') to the Secretary of State.
- 1.1.2. Natural England has already provided a summary of its principal concerns in its Relevant Representations, submitted to the Planning Inspectorate on 27 November 2025. This document comprises an updated detailed statement of Natural England's views, as they have developed in view of the common ground discussions that have taken place with the Applicant to date. These are structured as follows:
 - a. Section 2 describes the conservation designations, features and interests that may be affected by the Project and need to be considered.
 - b. Section 3 comprises Natural England's submissions in respect of the issues that concern it. This submission cross-refers to, and is supported by, the evidence contained in the Annexes.

2. CONSERVATION DESIGNATIONS, FEATURES AND INTERESTS THAT COULD BE AFFECTED BY THE PROPOSED PROJECT

The following is a brief summary of the interest features of the relevant designated areas of concern in this matter. Designation citations and maps are included in Annexes A and B.

2.1. International conservation designations

Norfolk Valley Fens Special Area of Conservation ('SAC')

Name: Norfolk Valley Fens Unitary Authority/County: Norfolk SAC status: Designated on 1 April 2005 Grid reference: TL937960 SAC EU code: UK0012892 Area (ha): 616.21

Qualifying Features: H4010. Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath H4030. European dry heaths H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco Brometalia*); Dry grasslands and scrublands on chalk or limestone H6410. *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*); Purple moor-grass meadows H7210. Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*; Calcium-rich fen dominated by great fen sedge (saw sedge)* H7230. Alkaline fens; Calcium-rich springwater-fed fens H91E0. Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*); Alder woodland on floodplains* S1014. *Vertigo angustior*; Narrow-mouthed whorl snail S1016. *Vertigo moulinsiana*; *Desmoulin's* whorl snail

Thames Estuary and Marshes Special Protection Area ('SPA')

Name: Thames Estuary and Marshes Unitary Authority/County: Essex County Council, Gravesham Borough Council, Kent County Council, Medway Council, and Thurrock Borough Council. Size of SPA: The SPA covers an area of 4,838.94 ha

Qualifying Features: A082 *Circus cyaneus*; Hen harrier (Non-breeding) A132 *Recurvirostra avosetta*; Pied avocet (Non-breeding) A137 *Charadrius hiaticula*; Ringed plover (Non-breeding) A141 *Pluvialis squatarola*; Grey plover (Non-breeding) A143 *Calidris canutus*; Red knot (Non-breeding) A149 *Calidris alpina alpina*; Dunlin (Non-breeding) A156 *Limosa limosa islandica*; Black-tailed godwit (Non-breeding) A162 *Tringa totanus*; Common redshank (Non-breeding) Waterbird assemblage

Stour and Orwell SPA

Name: Stour and Orwell Estuaries Unitary Authority/County: Essex, Suffolk. Size of SPA: The SPA covers an area of 3,676.92 ha

Qualifying Features: A046a *Branta bernicla bernicla*; Dark-bellied brent goose (Non-breeding) A054 *Anas acuta*; Northern pintail (Non-breeding) A132 *Recurvirostra avosetta*; Pied avocet (Breeding) A141 *Pluvialis squatarola*; Grey plover (Non-breeding) A143 *Calidris canutus*; Red knot (Non-breeding) A149 *Calidris alpina alpina*; Dunlin (Non-breeding) A156 *Limosa limosa islandica*; Black-tailed godwit (Non-breeding) A162 *Tringa totanus*; Common redshank (Non-breeding) Waterbird assemblage

2.2. National conservation designations

The above sites are also designated at a national level as:

- Flordon Common SSSI
- Mucking Flats and Marshes Estuary; and
- Orwell Estuary SSSI

2.3. Landscape designations

Dedham Vale Area of Outstanding Natural Beauty
Suffolk Coasts and Heaths Area of Outstanding Natural Beauty

3. NATURAL ENGLAND'S CONCERNS AND ADVICE

3.1. The principal issue

3.1.1. Natural England identified the following main issue in its Relevant Representations:

- a. Potential impacts on Dedham Vale and Suffolk Coast and Heaths National Landscape

These issues will be discussed in corresponding sections below along with any updates on the progress or resolution of issues.

3.2. Impacts on Habitats

3.2.1. Norfolk Valley Fens SAC

In our relevant representations Natural England raised concerns relating to a potential impact on Norfolk Valley Fens SAC through Horizontal Directional Drilling ('HDD') under a watercourse upstream of the designated site. Further discussions with the applicant have confirmed that they no longer intend to utilise HDD at this location and our concern has therefore been addressed

Thames Estuary and Marshes SPA and Ramsar and Stour and Orwell SPA and Ramsar

As advised previously, Natural England is content that the construction and operational stages of Norwich to Tilbury can be carried out without impacting on SPA species using either designated or functionally linked land.

3.3. Long-term impacts on soil ecology

3.3.1. Following further discussions with the applicant and our national specialists, Natural England is satisfied that the applicants approach to Best and Most Versatile Soils is appropriate

3.4. Impacts on the landscape

3.4.1. The proposed development scheme will affect the Dedham Vale Area National Landscape, which is a nationally designated landscape, and its 'setting'. A key concern for Natural England is that the Statutory purpose of the AONB is upheld. Natural England has previously engaged with National Grid in relation to this issue and we welcome the proposal to utilise underground cables within Dedham Vale National landscape and within 'the setting' of Dedham Vale National Landscape in the Great Horkesley area. Undergrounding within 'the setting' of Dedham Vale AONB to reduce the visual impact of overhead lines from views with the National Landscape is fully justified by the national importance of this landscape.

3.4.2. Natural England commend acknowledgement that there would be significant adverse effects on special qualities within Dedham Vale National Landscape during the construction period including major adverse impacts on 'Iconic lowland river valley associated with the artist John Constable RA, the views he painted are still recognisable today' and 'A sense of relative tranquillity' but would support any further measures put forward to reduce the impact.

3.4.3. We are generally content that effects on the special qualities of Dedham Vale National Landscape (in a mitigated scenario) would reduce to minor and not significant (adverse) during operation once the underground cables are covered over and land use and landcover reinstated as far as practicable. We welcome confirmation that Church Wood adjacent to St Mary's Church (Grade 1 Listed) and Church Farm (formerly the Glebe Farm, Grade 2 Listed) within the Dedham Vale AONB on the Langham Hall Estate will not be affected and consider this matter resolved.

3.4.4. Other organisations and individuals may have more detailed site-specific knowledge and experiences which a national organization such as NE does not. We advise, in particular, that due consideration should be given to the Dedham Vale National Landscape Partnership and whether they consider that the duty to 'further the purposes' of the national landscape as conferred by section 85 of the Countryside and Rights of Way Act (2000) as amended by section 245 of the Levelling Up and Regeneration Act (2023) has been satisfied and secured.

3.5. Ancient Woodland and Lower Thames Crossing Compensation Land

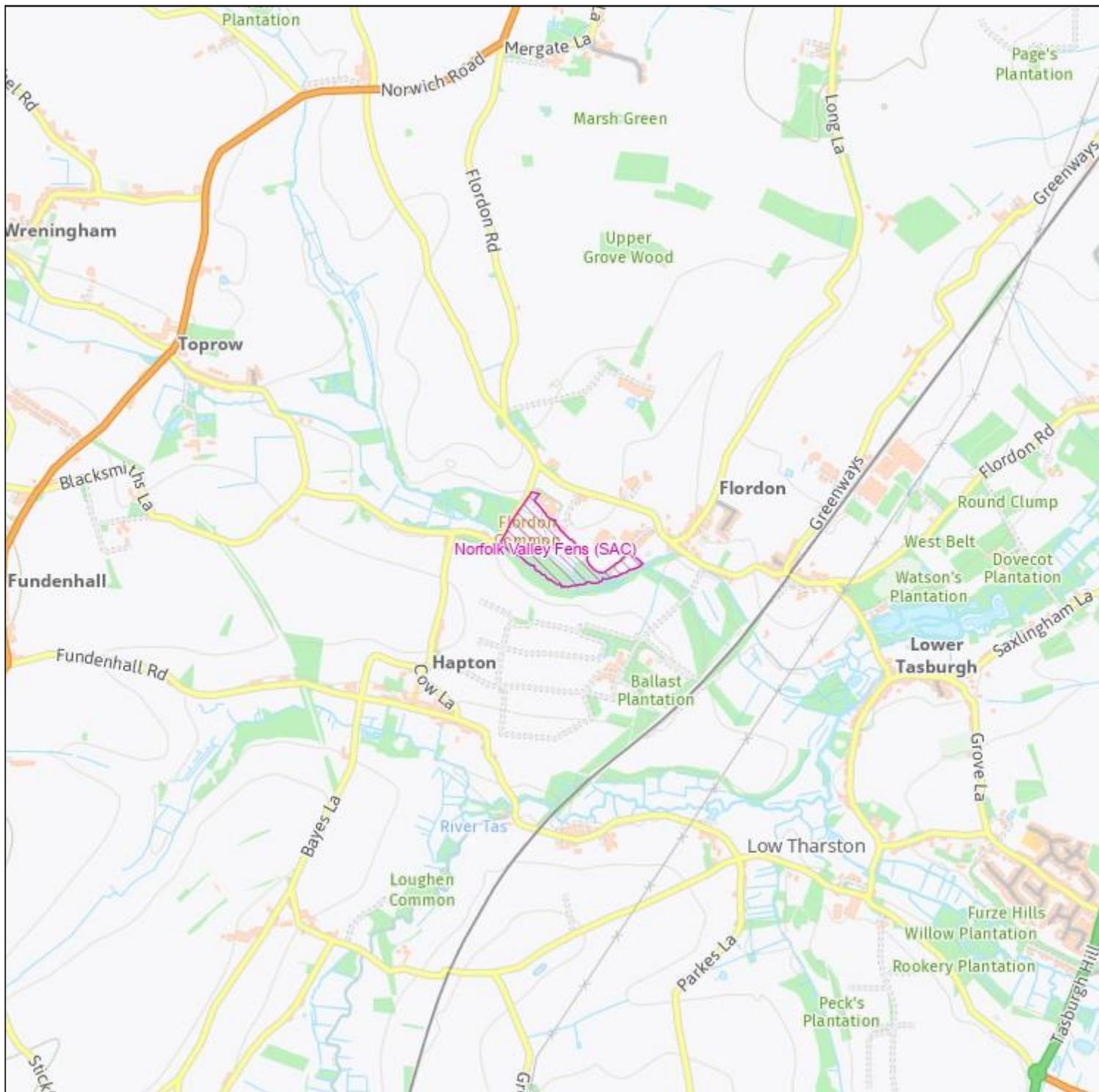
3.5.1. The applicant has requested Natural England's advice in relation to areas of Ancient Woodland which have been added to the Ancient Woodland Inventory whilst the scheme has been in the design phase. Our specialists have recently provided further advice which we will discuss with the applicant shortly but the broad position is that these additional sites should be treated as any other parcel of Ancient Woodland and that an addendum to the Environmental Statement will likely be required.

3.5.2. Natural England and the applicant are seeking a date in the next few weeks to further discuss impacts on the Lower Thames Crossing compensation land

3.5.3. We remain confident that both of these issues can and will be resolved.

Part II: Annexes

A: Designated site maps



Norfolk Valley Fen SAC

Key

Designations

Special Areas of Conservation England © Natural England



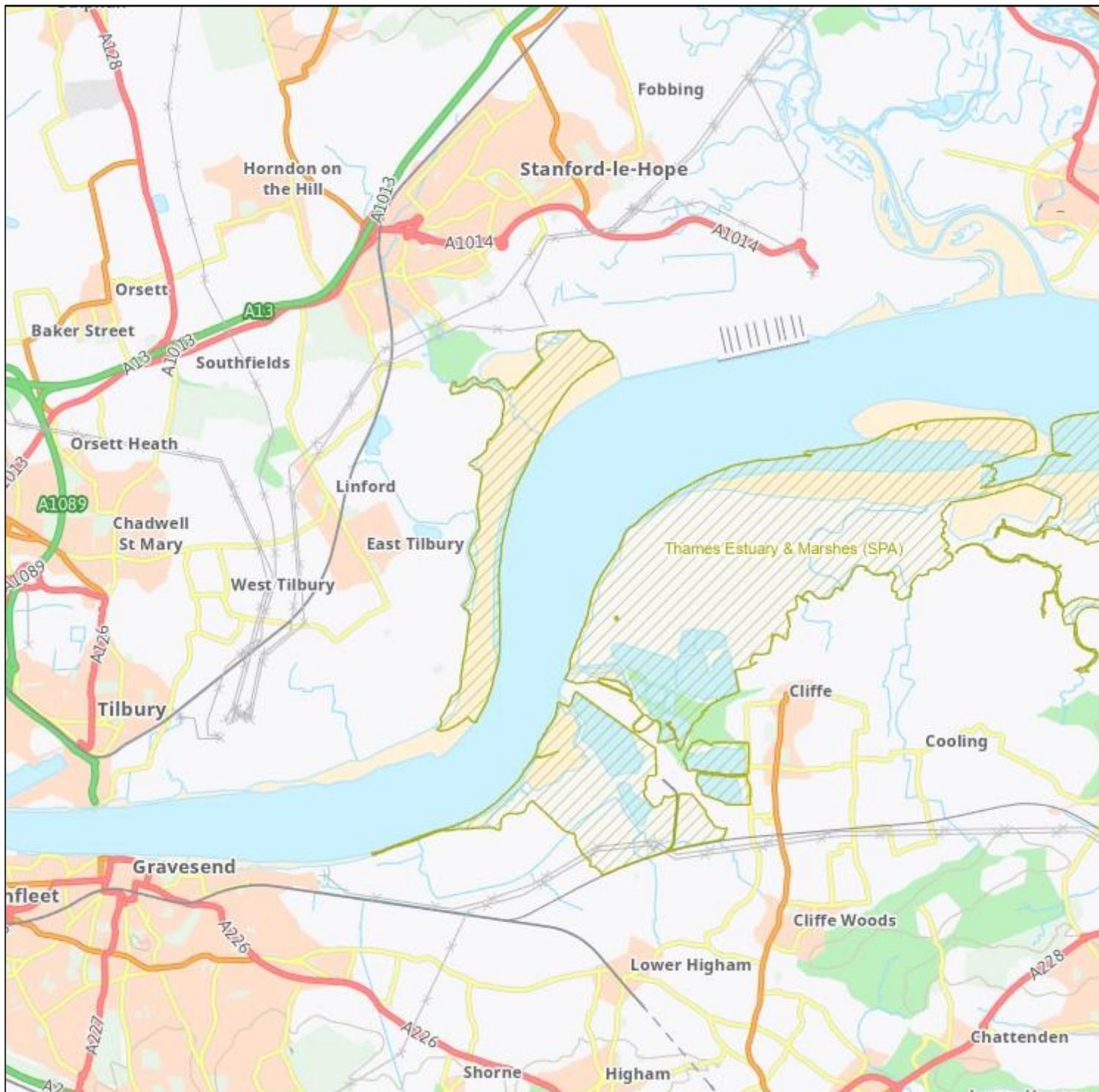
© Crown copyright and database rights 2026. Ordnance Survey AC0000851168.



Map Produced from NE Maps on 26/02/2026

Map Projection: British National Grid

Map Scale at A4: 1: 25000



Thames Estuary and Marshes SPA

Key

Designations

Special Protection Areas England © Natural England



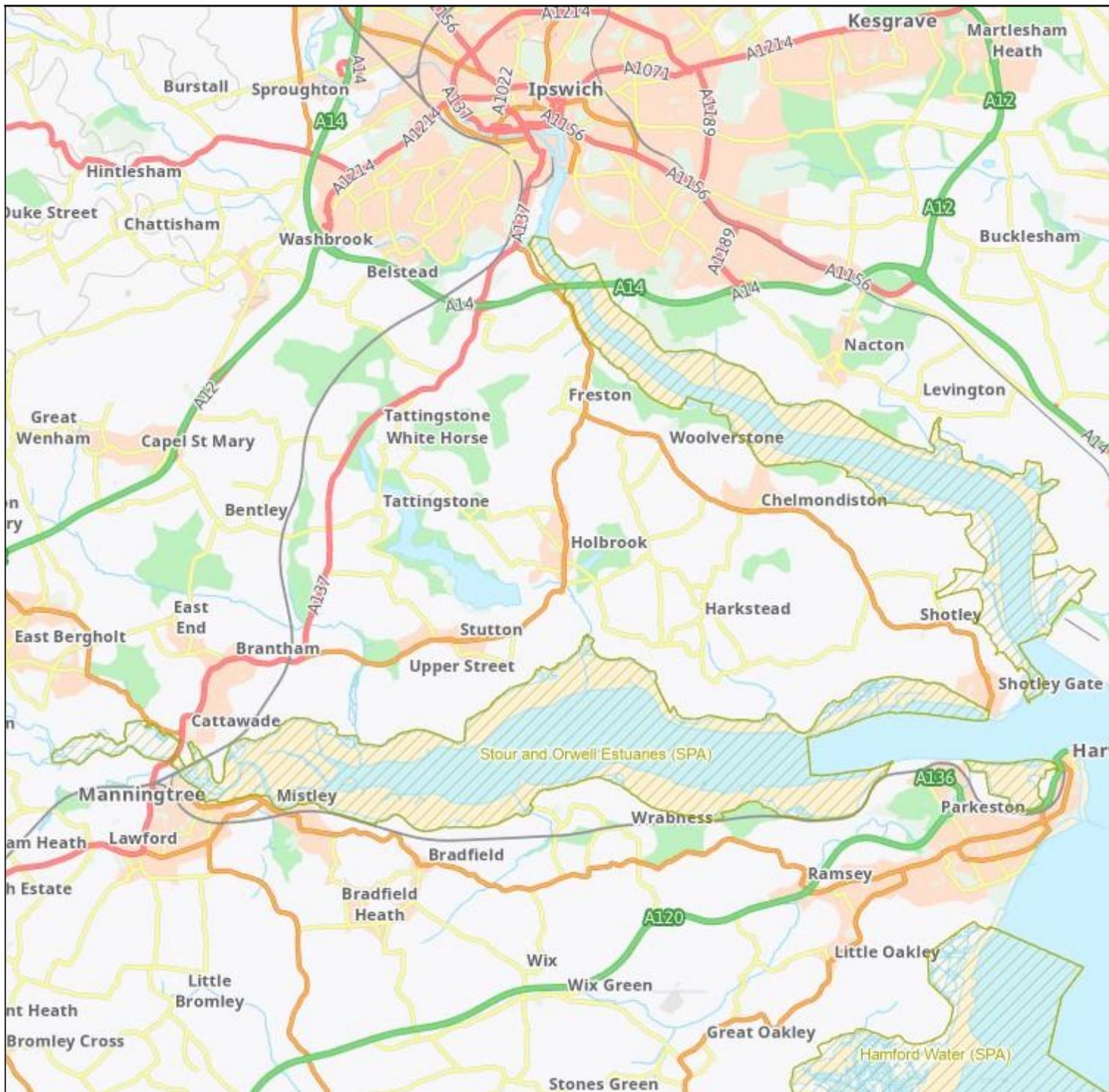
© Crown copyright and database rights 2026. Ordnance Survey AC0000851168.



Map Produced from NE Maps on 26/02/2026

Map Projection: British National Grid

Map Scale at A4: 1: 75000



Stour and Orwell SPA

Key

Designations

Special Protection Areas England © Natural England



© Crown copyright and database rights 2026. Ordnance Survey AC0000851168.



Map Produced from NE Maps on 26/02/2026

Map Projection: British National Grid

Map Scale at A4: 1: 100000

ANNEX B: Designated site conservation objectives and citations

European Site Conservation Objectives for Norfolk Valley Fens Special Area of Conservation Site Code: UK0012892



With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- **The extent and distribution of qualifying natural habitats and habitats of qualifying species**
- **The structure and function (including typical species) of qualifying natural habitats**
- **The structure and function of the habitats of qualifying species**
- **The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely**
- **The populations of qualifying species, and, ➤ The distribution of qualifying species within the site.**

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

H4010. Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath H4030. European dry heaths

H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*); Dry grasslands and scrublands on chalk or limestone

H6410. *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*); Purple moor-grass meadows

H7210. Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*; Calcium-rich fen dominated by great fen sedge (saw sedge)*

H7230. Alkaline fens; Calcium-rich springwater-fed fens

H91E0. Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*); Alder woodland on floodplains*

S1014. *Vertigo angustior*; Narrow-mouthed whorl snail

S1016. *Vertigo moulinsiana*; Desmoulin's whorl snail

* denotes a priority natural habitat or species (supporting explanatory text on following page)

EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora

Citation for Special Area of Conservation (SAC)

Name:	Norfolk Valley Fens
Unitary Authority/County:	Norfolk
SAC status:	Designated on 1 April 2005
Grid reference:	TL937960
SAC EU code:	UK0012892
Area (ha):	616.21
Component SSSI:	Badley Moor, Dereham SSSI, Booton Common SSSI, Buxton Heath SSSI, Coston Fen, Runhall SSSI, East Walton Common and Adcock's Common SSSI, Flordon Common SSSI, Foulden Common SSSI, Great Cressingham Fen SSSI, Holt Lowes SSSI, Potter and Scarning Fens SSSI, Sheringham and Beeston Regis Common SSSI, South Repps Common SSSI, Swangey Fen, Attleborough SSSI, Thompson Water, Carr and Common SSSI

Site description:

This site comprises a series of valley-head spring-fed fens. Such spring-fed flush fens are very rare in the lowlands. The spring-heads are dominated by the small sedge fen type, mainly referable to black-bog-rush – blunt-flowered rush (*Schoenus nigricans* – *Juncus subnodulosus*) mire, but there are transitions to reedswamp and other fen and wet grassland types. The individual fens vary in their structure according to intensity of management and provide a wide range of variation. There is a rich flora associated with these fens, including species such as grass-of-Parnassus *Parnassia palustris*, common butterwort *Pinguicula vulgaris*, marsh helleborine *Epipactis palustris* and narrow-leaved marsh-orchid *Dactylorhiza traunsteineri*.

In places the calcareous fens grade into acidic flush communities on the valley sides. Purple moor-grass *Molinia caerulea* is often dominant with a variety of mosses including thick carpets of bog-moss *Sphagnum* spp. Marshy grassland may be present on drier ground and purple moor-grass is again usually dominant but cross-leaved heath *Erica tetralix* can be frequent. Alder *Alnus glutinosa* forms carr woodland in places by streams. Wet and dry heaths and acid, neutral and calcareous grassland surround the mires.

Within the Norfolk Valley Fens there are a number of marginal fens associated with pingos – pools that formed in hollows left when large blocks of ice melted at the end of the last Ice Age. These are very ancient wetlands and several support strong populations of Desmoulin's whorl snail *Vertigo moulinsiana* as part of a rich assemblage of rare and scarce species in standing water habitat. At Flordon Common a strong population of narrow-mouthed whorl snail *Vertigo angustior* occurs in flushed grassland with yellow iris *Iris pseudacorus*.

Qualifying habitats: The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- Alkaline fens. (Calcium-rich springwater-fed fens)
- Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*). (Alder woodland on floodplains)*

- Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*. (Calcium-rich fen dominated by great fen sedge (saw sedge))*
- European dry heaths
- *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*). (Purple moor-grass meadows)
- Northern Atlantic wet heaths with *Erica tetralix*. (Wet heathland with cross-leaved heath)
- Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*FestucoBrometalia*). (Dry grasslands and scrublands on chalk or limestone)

Qualifying species: The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following species listed in Annex II:

- Narrow-mouthed whorl snail *Vertigo angustior*
- Desmoulin's whorl snail *Vertigo moulinsiana*

Annex I priority habitats are denoted by an asterisk (*).

This citation relates to a site entered in the Register of European Sites for Great Britain. Register reference number: UK0012892 Date of registration: 14 June [REDACTED] 2005
Signed:
On behalf of the Secretary of State for Environment, Food and Rural Affairs

European Site Conservation Objectives for Thames Estuary and Marshes Special Protection Area Site Code: UK9012021

NATURAL
ENGLAND

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- **The extent and distribution of the habitats of the qualifying features**
- **The structure and function of the habitats of the qualifying features**
- **The supporting processes on which the habitats of the qualifying features rely** ➤ **The population of each of the qualifying features, and,** ➤ **The distribution of the qualifying features within the site.**

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

A082 *Circus cyaneus*; Hen harrier (Non-breeding)
A132 *Recurvirostra avosetta*; Pied avocet (Non-breeding)
A137 *Charadrius hiaticula*; Ringed plover (Non-breeding)
A141 *Pluvialis squatarola*; Grey plover (Non-breeding)
A143 *Calidris canutus*; Red knot (Non-breeding)
A149 *Calidris alpina alpina*; Dunlin (Non-breeding)
A156 *Limosa limosa islandica*; Black-tailed godwit (Non-breeding)
A162 *Tringa totanus*; Common redshank (Non-breeding)
Waterbird assemblage

This is a European Marine Site

This SPA is a part of the Thames Estuary and Marshes European Marine Site (EMS). These Conservation Objectives should be used in conjunction with the Conservation Advice document for the EMS. Natural England's formal Conservation Advice for European Marine Sites can be found via GOV.UK.

EC Directive 79/409 on the Conservation of Wild Birds: Special Protection Area

Name: Thames Estuary and Marshes

Unitary Authority/County: Essex County Council, Gravesham Borough Council, Kent County Council, Medway Council, and Thurrock Borough Council.

Consultation proposal: Mucking Flats and Marshes SSSI and South Thames Estuary and Marshes SSSIs have been recommended as a Special Protection Area because of the site's European ornithological interest.

The Thames Estuary and Marshes Special Protection Area is a wetland of European importance comprising a mosaic of intertidal habitats, saltmarsh, coastal grazing marshes, saline lagoons and chalk pits. The site provides wintering and breeding habitats for important assemblages of wetland bird species, particularly wildfowl and waders as well as supporting migratory birds on passage. The site forms part of the wider Thames Estuary together with other classified SPAs in both Essex and Kent.

Boundary of SPA: The SPA boundary is within or coincident with the above SSSI boundaries. See SPA map for further detail.

Size of SPA: The SPA covers an area of 4,838.94 ha.

European ornithological importance of the SPA: Thames Estuary and Marshes SPA is of European importance because:

- a) the site qualifies under **article 4.1** of the Directive (79/409/EEC) as it is used regularly by 1% or more of the GB populations of the following species listed on Annex I, in any season:

Annex I species	5 year peak mean 1993/94 - 1997/98	% GB population
Avocet <i>Recurvirostra avosetta</i>	283 individuals - wintering	28.3% GB
Hen Harrier <i>Circus cyaneus</i>	7 individuals - wintering	1.0% GB

- b) the site qualifies under **article 4.2** of the Directive (79/409/EEC) as it is used regularly by 1% or more of the biogeographical populations of the following regularly occurring migratory species (other than those listed on Annex I), in any season:

Species	5 year peak mean 1993/94 - 1997/98	% of population
Ringed Plover <i>Charadrius hiaticula</i>	1,324 individuals - passage	2.6% Europe/ Northern Africa (win)
Grey Plover <i>Pluvialis squatarola</i>	2,593 individuals - wintering	1.7% Eastern Atlantic (wintering)
Dunlin <i>Calidris alpina alpina</i>	29,646 individuals - wintering	2.1% N Siberia/Europe/ W Africa
Knot <i>Calidris canutus islandica</i>	4,848 individuals - wintering	1.4% NE Can/Grl/ Iceland/NW Eur
Black-tailed Godwit <i>Limosa limosa islandica</i>	1,699 individuals - wintering	2.4% Iceland (breeding)
Redshank <i>Tringa totanus totanus</i>	3,251 individuals - wintering	2.2% Eastern Atlantic (wintering)

European Site Conservation Objectives for Stour and Orwell Estuaries Special Protection Area Site Code: UK9009121



With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- **The extent and distribution of the habitats of the qualifying features**
- **The structure and function of the habitats of the qualifying features**
- **The supporting processes on which the habitats of the qualifying features rely** ➤ **The population of each of the qualifying features, and,** ➤ **The distribution of the qualifying features within the site.**

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

A046a *Branta bernicla bernicla*; Dark-bellied brent goose (Non-breeding)

A054 *Anas acuta*; Northern pintail (Non-breeding)

A132 *Recurvirostra avosetta*; Pied avocet (Breeding)

A141 *Pluvialis squatarola*; Grey plover (Non-breeding)

A143 *Calidris canutus*; Red knot (Non-breeding)

A149 *Calidris alpina alpina*; Dunlin (Non-breeding)

A156 *Limosa limosa islandica*; Black-tailed godwit (Non-breeding)

A162 *Tringa totanus*; Common redshank (Non-breeding)

Waterbird assemblage

This is a European Marine Site

This SPA is a part of the Stour and Orwell Estuaries European Marine Site (EMS). These Conservation Objectives should be used in conjunction with the Conservation Advice document for the EMS. Natural England's formal Conservation Advice for European Marine Sites can be found via [GOV.UK](https://www.gov.uk).

EC Directive 79/409 on the Conservation of Wild Birds Special Protection Area (SPA)

Name: Stour and Orwell Estuaries

Unitary Authority/County: Essex, Suffolk.

Site description: The Stour and Orwell estuaries straddle the eastern part of the Essex/Suffolk border in eastern England. The SPA is coincident with Cattawade Marshes Site of Special Scientific Interest (SSSI), Orwell Estuary SSSI and Stour Estuary SSSI. The estuaries include extensive mud-flats, low cliffs, saltmarsh and small areas of vegetated shingle on the lower reaches. The mud-flats hold *Enteromorpha*, *Zostera* and *Salicornia* spp. The site also includes areas of low-lying grazing marsh at Shotley Marshes on the south side of the Orwell and at Cattawade Marshes at the head of the Stour. Trimley Marshes on the north side of the Orwell includes several shallow freshwater pools, as well as areas of grazing marsh, and is managed as a nature reserve by the Suffolk Wildlife Trust. In summer, the site supports important numbers of breeding avocet *Recurvirostra avosetta*, while in winter it holds major concentrations of waterbirds, especially geese, ducks and waders. The geese also feed, and some waders roost, in surrounding areas of agricultural land outside the SPA. The site has close ecological links with the Hamford Water and Mid-Essex Coast SPAs, lying to the south on the same coast.

Size of SPA: The SPA covers an area of 3,676.92 ha.

Qualifying species:

The site qualifies under **article 4.1** of the Directive (79/409/EEC) as it is used regularly by 1% or more of the Great Britain populations of the following species listed in Annex I in any season:

Annex 1 species	Count and season	Period	% of GB population
Avocet <i>Recurvirostra avosetta</i>	21 pairs - breeding	5 year peak mean 1996 – 2000	3.6%

