



**Suffolk Wildlife Trust Response to Document: 8.8.1 Applicant's Comments
on Written Representations**

May 2026

Planning Inspectorate Ref: EN020027

Suffolk Wildlife Trust Registration Identification Ref: [REDACTED]

Temple Quay House,
2 The Square,
Temple Quay,
Bristol, BS1 6PN

NorwichToTilbury@planninginspectorate.gov.uk

7th May 2026

RE: Deadline 4 | Suffolk Wildlife Trust Response to Document: 8.8.1 Applicant's Comments on Written Representations.

I write with reference to the proposed Norwich to Tilbury Project (EN020027). Following the publication of [Document: 8.8.1 Applicant's Comments on Written Representations](#), Suffolk Wildlife Trust wish to thank the Applicant for responding to our [Written Representations](#). Upon review of the Applicant's response, it is our view that outstanding issues still need to be resolved, with further information and commitment from the Applicant required. To provide an update to the Planning Inspectorate we make the below comments:

Waveney and Little Ouse Landscape Recovery Project (WaLOR)

Suffolk Wildlife Trust seek to secure commitment through the DCO that, as stated in [Document: 8.8.1 Applicant's Comments on Written Representations](#), "The Applicant's 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."

We have discussed this further with National Grid and their consultants and explained our view that the wording above is not sufficiently strong to guarantee that the Main Works Contractor(s) *will* engage with the WaLOR project team during detailed design development, to *avoid* any potential for conflicts between the two projects. The planned river and floodplain restoration works in this location are critical components of the WaLOR project's implementation agreement with DEFRA and it is essential that the detailed design and construction work carried out as part of the Norwich to Tilbury scheme does not compromise the delivery of these restoration works. In particular, the undergrounding of the 11kV and 33kV lines in the floodplain must achieve sufficient depth at points where the lines will cross the restored river channel.

It is our understanding that the wording in the OLEMP will be strengthened to ensure that communication and coordination is guaranteed and that the detailed design and implementation of works by the Applicant's Main Works Contractor(s) is compatible with the WaLOR project's planned river and floodplain habitat restoration works where the location of these overlaps with the Norwich to Tilbury project.

Waveney Valley Crossing – bird diverters

Suffolk Wildlife Trust remain concerned regarding the lack of bird diverters located above and to the south of the River Waveney, which may be used as a nighttime navigational aid by birds, including those susceptible to collision with electricity infrastructure. We have discussed these concerns with members of the National Grid Project Team and await further discussion.

The Figure below, taken from National Grid’s Norwich to Tilbury Interactive Map (2025 DCO Version, pylon route in purple with pylons RG087 and RG088 labelled), shows in green the area where diverters are currently proposed, with the area of concern to Suffolk Wildlife Trust in orange.

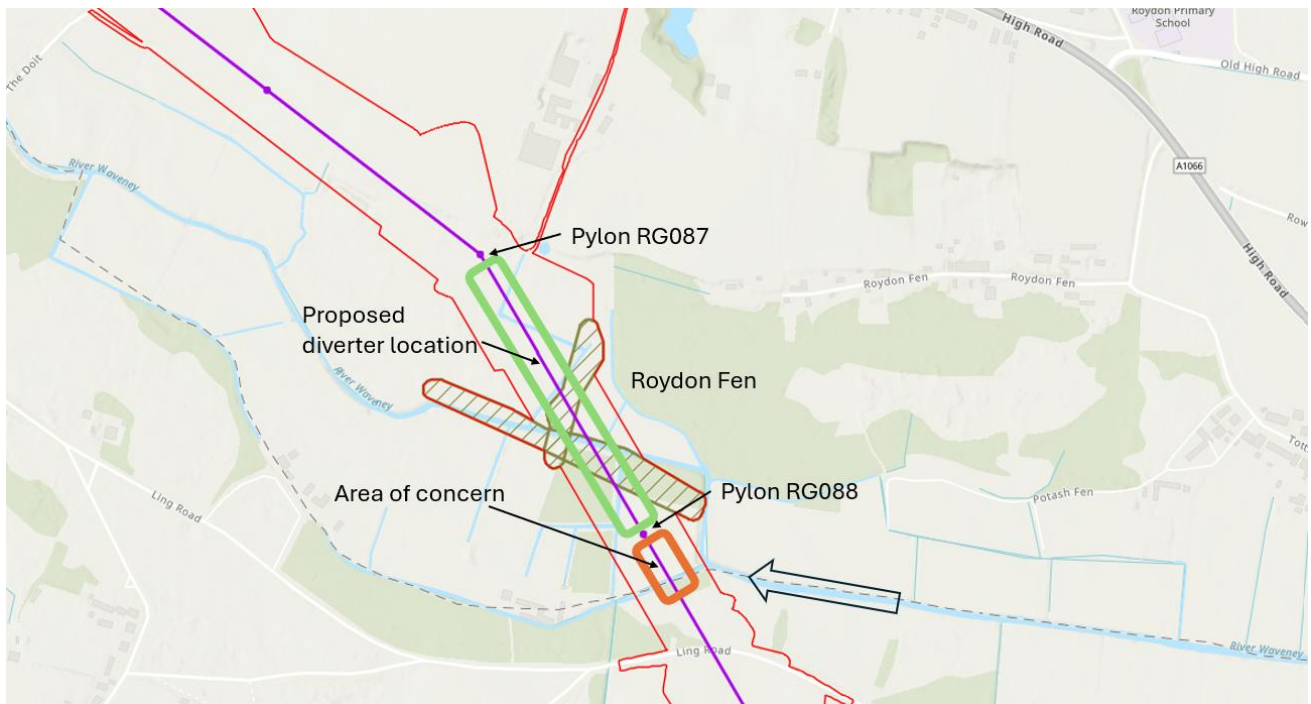


Figure showing area of concern for impacts to birds in flight (marked in orange) which lies to the south of the proposed areas of bird diverters (marked in green) which ends at Pylon RG088

Our rationale for this is that there is a degree of uncertainty around the line of flight that birds will take, notably when moving east to west up the Waveney Valley (denoted with a black arrow in the above figure). In this instance, birds may not head north towards Roydon Fen following the main channel but may continue along a smaller channel which runs to the south of Pylon RG088 (and forms the Norfolk / Suffolk boundary).

If this precautionary approach is not undertaken, then we consider that some post-construction monitoring would be prudent to confirm that any increase in collision risk will not in fact have significant adverse impacts on future bird populations that may be affected. While monitoring of collisions is known to be difficult, the monitoring of birds at risk within the valley is entirely possible and would allow the threat or risk to be assessed (and therefore whether additional mitigation should be considered or would be required).

County Wildlife Sites (CWS)

Suffolk Wildlife Trust ask that the Applicant considers the use of green hay, as a means of acquiring seed of local provenance for grassland restoration on CWS, as the preferred means of restoration (where green hay is available) on grassland CWSs. We have discussed this further with the Applicant and are happy to share details of the Suffolk Green Hay register at an appropriate time.

Biodiversity Net Gain – Watercourse Enhancement

The Applicant's response to our concerns regarding the removal of invasive non-native species (INNS) as a means of enhancing watercourses to deliver Biodiversity Net Gain confirms that the intention is to implement a five-year monitoring and management plan. We understand that on-site watercourse measures including INNS removal will seek to ensure that baseline conditions are re-established to achieve no-net-loss (NNL) in Watercourse Biodiversity Net Gain, and that sufficient additional off-site Watercourse BNG Units will be purchased to take the scheme for NNL to at least 10% BNG for this habitat type.

Notwithstanding our comments and recommendations in relation to the establishment and operation of the proposed Ecology Working Group, we would be satisfied with this approach and seek confirmation from the Applicant that this understanding is correct.

Ecology Working Group

Suffolk Wildlife Trust believe the role of an Ecology Working Group must be strengthened within the DCO so that it is a consulted group which has a formal role in advising on the development and delivery of the LEMP, including any required adaptive management (as opposed to a group which would primarily receive updates from the Applicant). We will be providing as a separate document a *Proposed DCO Requirement for an Ecology Working Group for Norwich to Tilbury* as part of our submission documents and urge this to be used as a blueprint for the group. We have shared a draft of this document with the Applicant.

Suffolk Wildlife Trust understand that there is no requirement to monitor the bat flyways during construction or when reinstated habitats are developing as part of this Project but welcome the Applicant's willingness to discuss a monitoring programme which sits outside the DCO process; we believe that such a programme should sit under the remit of the Ecology Working Group.

Additional Comment

Suffolk Wildlife Trust note that the [Local Impact Report](#) submitted by South Norfolk District Council includes an objection to the proposal by the Applicant for a proposed 28-day period for discharge of condition (including ecology condition). We support the proposed 8-week/ 56-day day minimum period alternative proposed by South Norfolk Council.

Please reach out with any further questions,

Yours sincerely,



Planning & Advocacy Officer