

AENC-NG-CNS-REP-0292

# Norwich to Tilbury

**Volume 8: Examination Documents**

**Document: 8.9.1.1 Addendum to ExQ1 BIO 1.6 - Advice Letter  
on bats and letters of no impediment from Natural England**

**Final Issue A**

**May 2026**

**Planning Inspectorate Reference: EN020027**

**nationalgrid**

Date: 30 March 2026  
Our ref: Norwich to Tilbury (2025-72559-EPS-AD1-1)  
(NATIONALLY SIGNIFICANT INFRASTRUCTURE  
PROJECT)



██████████  
Senior Consents Manager  
National Grid

*Sent by e-mail only*

Customer Services  
Hornbeam House  
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0300 060 3900

Dear Mr ██████████,

<p><b>DRAFT MITIGATION LICENCE APPLICATION STATUS:</b> Initial Draft Application</p> <p><b>LEGISLATION:</b> The Conservation of Habitats and Species Regulations 2017 (as amended) / The Wildlife and Countryside Act 1981</p> <p><b>NSIP:</b> Norwich to Tilbury</p> <p><b>SPECIES:</b> UK bat species (multiple)</p>
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Thank you for your draft bat mitigation licence application in association with the above referenced NSIP site, received on the 3<sup>rd</sup> March 2026. As stated in our published guidance, once Natural England is content that the draft licence application is of the required standard, we will issue a 'Letter of No Impediment'. This is designed to provide the Planning Inspectorate and the Secretary of State with confidence that the competent licensing authority sees no impediment to issuing a licence in future, based on information assessed to date in respect of these proposals.

As discussed previously, the scheme as currently proposed has not identified any impacts to bats which would likely constitute an offence under the legislation and therefore require a licence, hence any proposals at this time to address future and currently unknown impacts to bats would be precautionary, and therefore prevent Natural England from issuing a Letter of No Impediment as we would typically do where licensable impacts have been confirmed. Instead, it has been discussed with the applicant and their ecological representatives that Natural England will provide some assurance and comfort that any proposed mitigation strategy to address currently unknown impacts to bats is suitable, and potentially licensable in the future should impacts be confirmed.

However, following our further review of the documents submitted to Natural England on 3<sup>rd</sup> March 2026 for our consideration, there remain a number of points that require further information from the applicant before Natural England will be in a position to provide the degree of comfort as referenced in the previous paragraph. Further, the applicant and their representatives have requested a strategic and project-wide licence with respect to bats, which requires a more bespoke licence application and approach than standard individual mitigation licences. At present, there remains insufficient detail and certainty on some key areas that would need to be addressed to allow Natural England to give a firmer view on the proposed

mitigation strategy, and on whether it would ultimately be permissible as part of a licensed approach should future licensable impacts to bats from the scheme be identified and confirmed.

Please note, it is Natural England's view that some of these points cannot be fully addressed until the updated surveys have been conducted, consequently Natural England will be unable to provide additional comment on the proposals until the updated surveys have been completed. The areas of concern are highlighted below; please note some of the issues previously mentioned have not been addressed and have been included for completeness.

### **Appointed Person**

No evidence has been provided as to the authority of Mr Keven Roeton, the proposed Appointed Person, to act on behalf of the company or organisation. This evidence will be required on submission of a formal licence application.

### **Named Ecologist**

No evidence has been submitted regarding the experience of the proposed Named Ecologist with respect to mitigation licensing. Any Named Ecologist must be able to evidence their experience with all the species and roost types that are being requested on the licence. This evidence can either be provided through the provision of relevant licence reference numbers for previous mitigation licences held by the applying ecologist, or by their supplying two references from appropriate individuals. It is noted, though, that this is recognised on the application form.

### **Survey Information**

#### **Desk Study**

In the response issued on the 26<sup>th</sup> January 2026 Natural England queried the focus on the barbastelle records for the local planning search. The response provided is not considered sufficient to justify why planning portal searches of barbastelle only are sufficient. As such the previous comment, included below is still applicable. Please note, Natural England do acknowledge given the size of the scheme this could result in significant data processing, as such a 2km planning search will only be required for areas that have direct impacts on habitat with bat potential.

The review of the planning proposals which may impact the same bat population(s) has only focused on barbastelle bats. Currently the project wide licence application does not propose impacts on barbastelle roosts, as per Table 5.1 of the Method Statement document. Considering this, there is limited value in reviewing impacts on barbastelles alone. Multiple other bat species are proposed to be included on the licence, therefore a robust understanding of any previous or future planning proposals likely to impact the same population(s) of bats across all relevant species should be provided.

#### **Ground Level Tree Assessments (GLTAs)**

The discussion around the timing of GLTAs is considered satisfactory; however, it has been included in the pre-construction surveys section of the updated bespoke method statement (5.1.8), that the updated surveys are not considered pre-construction surveys and therefore should not be included in this section of the method statement.

#### **Impact Assessment**

It is acknowledged that impact assessment is limited as currently no bats roosts have been identified that will be destroyed by the scheme, and the scheme has previously re-directed the route to avoid impacts, which is welcome by Natural England. Once the updated surveys are completed, and if bat roosts identified more detailed impact assessment will be required in terms of the total numbers of roosts lost, but also indirect impacts, for example, detailed assessment of noise and vibration associated with the construction approaches described within the method statement, and at what distance indirect impacts are considered unlikely. For example, it has been concluded that indirect impacts are likely on the soprano pipistrelle roosts identified adjacent to the scheme at Glebe Reservoir, given the proximity of roost four in particular (identified from Figure 8.11.10, of the Bat Radio Tracking Report, dated August 2025), more detailed assessment is required for review by Natural England.

As requested in the response issued on the 26<sup>th</sup> January 2026 the scheme have included impact proposals within the updated method statement. However, the reasoning behind the numbers proposed has not been provided and is therefore currently unclear, given this Natural England cannot provide any certainty on the overall impact of a project wide licence. Consequently, Natural England cannot provide an assurance on the licence approach until updated surveys have been conducted and can better inform the impact assessment.

As requested, the scheme has proposed what would be considered 'small numbers' of bats based on species groups. Natural England would recommend this is clarified per species, instead of species groups given the variation in roost sizes recorded, e.g. common pipistrelle roost numbers are known to be smaller than soprano pipistrelle. Further to this, please detail the basis of the maternity roost size referenced.

## **Mitigation and Compensation**

As highlighted above, Natural England considers that further consideration of impacts is necessary. Given this, the construction elements where indirect disturbance may take place will likely need to be re-assessed, and this may in turn affect what mitigation will be appropriate and required.

As raised previously, Table 5.1 of the Method Statement details the proposed compensation for any losses of confirmed roosts. The table demonstrates that for low conservation status roosts of common pipistrelle, soprano pipistrelle, Nathusius' pipistrelle, Brandt's, Daubenton's, Natterer's, serotine, noctule, Leisler's and brown long-eared, and where a tree is identified as a roost for one roost type and one species, replacement roosts may not be required. As highlighted Natural England are concerned this may impact on the Favourable Conservation Status of the species in question. Whilst the figure 6 provided demonstrates the areas of woodland or groups of trees subject to direct impacts, it is not currently understood what resource each of these areas presents, and therefore situations where this approach might be necessary; given this Natural England would recommend a more detailed breakdown of these areas once the updated surveys have been completed. This will enable Natural England to understand the resource overall, we would recommend a breakdown of the trees' roosting potential, with number of lost and retained trees.

Further details on the use of veteranisation has been provided and is considered appropriate. However, details on the creation of the features and monitoring proposed have not been provided. Once the species impacted by the scheme are confirmed examples of the veteranisation methodology should be provided for review by Natural England with monitoring proposals for the features.

## **Figures**

A project-wide licence will require bespoke licence maps and figures to be used. Natural England can provide further direction and advice on this should a project-wide licence approach be developed further; however, the figures currently provided will require updating with the

additional survey data. The detail and layout provided in the figures to date are considered sufficiently detailed.

## **Next Steps**

Should the DCO be granted then the mitigation licence application must be formally submitted to Natural England. At this stage any modifications to the timings of the proposed works, e.g. due to ecological requirements of the species concerned, must be made and agreed with Natural England before a licence is granted.

If other minor changes to the application are subsequently necessary, e.g. amendments to the work schedule/s then these should be outlined in a covering letter and must be reflected in the formal submission of the licence application. These changes must be agreed by Natural England before a licence can be granted. If changes are made to proposals or timings which do not enable us to meet reach a 'satisfied' decision, we will issue correspondence outlining why the proposals are not acceptable and what further information is required. These issues will need to be addressed before any licence can be granted.

I should also be grateful if an open dialogue can be maintained with yourselves regarding the progression of the DCO application so that, should the Order be granted, we will be in a position to assess the final submission of the application in a timely fashion and avoid any unnecessary delay in issuing the licence.

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is, therefore, not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

I hope the above has been helpful. However, should you have any queries then please do not hesitate to contact me.

Yours sincerely,

██████████  
Senior Officer – Chargeable Advice and Strategic Casework Team  
Natural England Wildlife Licensing Service

██████████ [@naturalengland.org.uk](mailto:██████████@naturalengland.org.uk)

Date: 30 March 2026  
Our ref: Norwich to Tilbury (2025-72559-EPS-AD1)  
(NATIONALLY SIGNIFICANT INFRASTRUCTURE  
PROJECT)



██████████  
Senior Consents Manager  
National Grid

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0300 060 3900

Dear Mr ██████████,

**DRAFT MITIGATION LICENCE APPLICATION STATUS:** Initial Draft Applications

**LEGISLATION:** The Protection of Badgers Act 1992

**NSIP:** Norwich to Tilbury

**SPECIES:** Badgers (*Meles meles*)

Thank you for your further draft badger mitigation licence application documents in association with the above-referenced NSIP site. As stated in our published guidance, once Natural England is content that the draft licence application is of the required standard, we will issue a 'Letter of No Impediment'. This is designed to provide the Planning Inspectorate and the Secretary of State with confidence that the competent licensing authority sees no impediment to issuing a licence in future, based on information assessed to date in respect of these proposals.

Following further assessment of the submitted draft application documents, I can now confirm that, on the basis of the information provided, **Natural England sees no impediment to licences to derogate for impacts to badgers being issued**, should the DCO be granted.

However, please note the issues as discussed and commented on in the subsequent paragraphs have been identified within the current drafts of the Method Statement documents and associated documents, and these will need to be addressed before the licence applications are formally submitted.

Project Licence Application:

Natural England has requested bait-marking surveys for several complex sett clusters but the applicant is instead relying on worst-case closure assumptions. For the formal licence submission, the applicant must either undertake bait-marking to confirm clan territories or provide a robust, evidence-based ecological justification for not doing so.

Natural England requires full cumulative impact maps showing all setts (retained, temporarily closed and permanently closed) alongside detailed construction footprints and wider landscape context. For the formal licence submission, the applicant must supply updated map sets with full sett classifications, construction footprint layers, identification of off-site setts where known, and a single project-wide cumulative impact map.

Natural England requires detailed justification for the high number of proposed permanent sett closures and appropriate consideration of and evidence that alternatives such as retention, temporary closure or artificial sett creation have been fully explored. For the formal submission, the applicant must provide evidence-based reasoning for each proposed closure, demonstrate why avoidance through micro-siting or temporary closure is not feasible, assess territory availability, and justify any rejection of artificial sett provision.

Natural England requires full activity-status data for sett entrances; the applicant has confirmed that this will be collected during pre-construction surveys. For the formal licence determination, the applicant must provide entrance-level activity data in advance and update sett classifications accordingly. Relatedly, the justification for sett classifications in areas where the location of the associated main sett is unknown, such as for clusters S168 and S161–162–322, must be provided. Currently, limited survey coverage and assumptions about off-site setts is relied upon. The formal submission must include confirmed main sett associations, based on additional surveys as needed, and provide evidence-based justification for all classifications.

A complete HDD frac-out contingency plan will be required once the DCO consent is granted. For the formal licence submission, the applicant must supply this full plan demonstrating how frac-out risks will be managed and how potentially affected setts will be safeguarded.

#### Main Setts Application:

Natural England has requested bait-marking surveys for several complex sett clusters but the applicant is instead relying on worst-case closure assumptions. For the formal licence submission, the applicant must either undertake bait-marking to confirm clan territories or provide a robust, evidence-based ecological justification for not doing so.

Natural England also requested cumulative impact mapping that displays all main, annexe, subsidiary and outlier setts within the territorial context of the four main setts. The formal submission must include complete spatial mapping of all known setts with classifications, all relevant construction features, clear identification of retained and closed setts, and full territorial context to allow Natural England to assess cumulative impacts.

Natural England has requested that drainage works near Sett S248 be relocated more than 30 m away or, if this is not possible, for detailed justification as to why works must occur in close proximity to Sett S248. For the formal submission, the applicant must confirm the final drainage alignment, demonstrate that it meets the >30 m requirement, or provide technical and ecological evidence showing that disturbance or flooding will not occur if a closer alignment is necessary.

For Setts S74 and S246, Natural England requires construction programme details such as the duration of works, haul-road usage frequency, and baseline disturbance levels; the applicant has indicated that this information will only be known after consent once contractors are appointed. The formal submission should include expected working durations within 30 m of each main sett, anticipated traffic types and frequencies, the current disturbance baseline, and a clear prediction of likely impacts so that disturbance thresholds can be properly assessed.

Natural England requested full entrance-level activity classifications for all sett entrances associated with main-sett clusters; the applicant has confirmed that this activity data will be collected during pre-construction surveys. For the licence submission, the applicant must provide a complete, entrance-by-entrance activity assessment based on surveys conducted within the previous 12 months and before licence determination.

Natural England requires clear justification for disturbance and damage impacts related to setts S74, S246, S248 and associated setts. The formal submission must provide sett-specific impact

justifications, final mapped working areas, confirmed haul-road offsets and cable alignments, and clear evidence explaining why each case requires a licensed approach.

## **Next Steps**

Should the DCO be granted then the mitigation licence application must be formally submitted to Natural England. At this stage any modifications to the timings of the proposed works, e.g. due to ecological requirements of the species concerned, must be made and agreed with Natural England before a licence is granted.

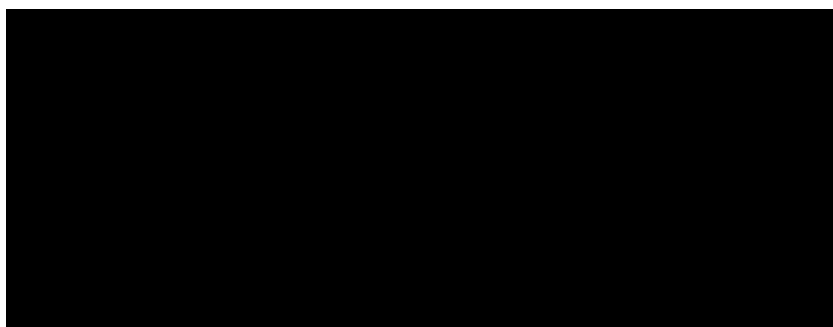
If other minor changes to the application are subsequently necessary, e.g. amendments to the work schedule/s then these should be outlined in a covering letter and must be reflected in the formal submission of the licence application. These changes must be agreed by Natural England before a licence can be granted. If changes are made to proposals or timings which do not enable us to meet reach a 'satisfied' decision, we will issue correspondence outlining why the proposals are not acceptable and what further information is required. These issues will need to be addressed before any licence can be granted.

I should also be grateful if an open dialogue can be maintained with yourselves regarding the progression of the DCO application so that, should the Order be granted, we will be in a position to assess the final submission of the application in a timely fashion and avoid any unnecessary delay in issuing the licence.

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is, therefore, not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

I hope the above has been helpful. However, should you have any queries then please do not hesitate to contact me.

Yours sincerely,



Principal Officer (Principal Adviser) – National Delivery

Wildlife Licensing – Chargeable Advice and Strategic Casework  
Natural England Wildlife Licensing Service

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Date: 30 March 2026  
Our ref: Norwich to Tilbury (2025-72559-EPS-AD1)  
(NATIONALLY SIGNIFICANT INFRASTRUCTURE  
PROJECT)



██████████  
Senior Consents Manager  
National Grid

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CW1 6GJ

0300 060 3900

Dear ██████████,

**DRAFT MITIGATION LICENCE APPLICATION STATUS:** Initial Draft Application

**LEGISLATION:** The Conservation of Habitats and Species Regulations 2017 (as amended) /  
The Wildlife and Countryside Act 1981

**NSIP:** Norwich to Tilbury

**SPECIES:** Hazel Dormouse (*Muscardinus avellanarius*)

Thank you for your further draft dormouse mitigation licence application in association with the above-referenced NSIP site. As stated in our published guidance, once Natural England is content that the draft licence application is of the required standard, we will issue a 'Letter of No Impediment'. This is designed to provide the Planning Inspectorate and the Secretary of State with confidence that the competent licensing authority sees no impediment to issuing a licence in future, based on information assessed to date in respect of these proposals.

Following further assessment of the submitted draft application documents, I can now confirm that, on the basis of the information provided, **Natural England sees no impediment to a licence to derogate for impacts to dormice being issued**, should the DCO be granted.

However, please note the following issues as discussed and commented on in the subsequent paragraphs have been identified within the current draft of the Method Statement document and associated documents, and these will need to be addressed before the licence application is formally submitted.

### **Application Form & Method Statement**

The majority of the points raised in Natural England's response of January 2026 and in subsequent meetings have been actioned; however, the following points will require additional detail and justification to be provided to address them as part of any formal licence application.

The applicant has not provided the required evidence demonstrating the Named Ecologist's relevant experience, past licence involvement, or required supporting references. Natural England will expect that the eventual proposed Named Ecologist will be suitably qualified and experienced with respect to dormouse licensing and managing large projects. The previous comments as provided in Natural England's response of 26th January 2026 drew reference to the requirements regarding the Named Ecologist information that will need to be evidenced and supplied as part of the formal licence application. It is noted that National Grid have

acknowledged these comments as part of their further documents submitted to Natural England for review in March 2026.

With reference to undertaking vegetation clearance during high-risk periods such as during the breeding or hibernation periods, Natural England will only license such activities for very small, critical areas and where appropriate justification is provided. National Grid have advised that such justification will be provided in future licence application documents.

With regards to impacts, specific details about the machinery to be used, including how impacts to dormice would be avoided or minimised, have not yet been provided. National Grid have responded to state that these details are currently unknown and will be provided later. This information will be required for the formal licence application.

Information on compensatory planting detailing species mix, plant age, and establishment times has not been provided. Natural England will require this detail to confirm whether compensation will achieve and deliver functional habitat continuity as required to meet the Favourable Conservation Status test.

Natural England requires that population-level monitoring of dormice is likely necessary due to long construction periods and separation between impacts and compensation. It is noted that National Grid rejects the need for this without providing detailed supporting evidence. This remains unresolved and will likely require further consideration and discussion during the formal licence assessment.

## **Next Steps**

Should the DCO be granted then the mitigation licence application must be formally submitted to Natural England. At this stage any modifications to the timings of the proposed works, e.g. due to ecological requirements of the species concerned, must be made and agreed with Natural England before a licence is granted.

If other minor changes to the application are subsequently necessary, e.g. amendments to the work schedule/s then these should be outlined in a covering letter and must be reflected in the formal submission of the licence application. These changes must be agreed by Natural England before a licence can be granted. If changes are made to proposals or timings which do not enable us to meet reach a 'satisfied' decision, we will issue correspondence outlining why the proposals are not acceptable and what further information is required. These issues will need to be addressed before any licence can be granted.

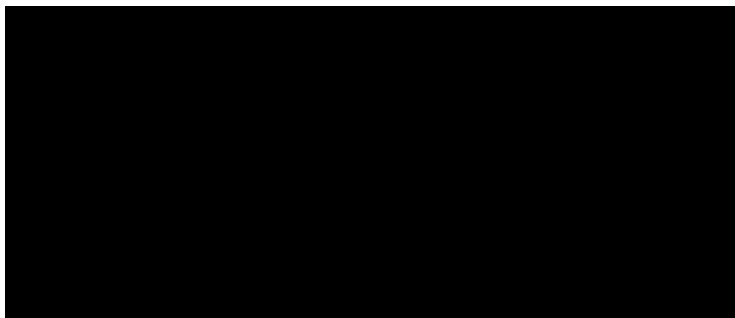
I should also be grateful if an open dialogue can be maintained with yourselves regarding the progression of the DCO application so that, should the Order be granted, we will be in a position to assess the final submission of the application in a timely fashion and avoid any unnecessary delay in issuing the licence.

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is, therefore, not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the

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I hope the above has been helpful. However, should you have any queries then please do not hesitate to contact me.

Yours sincerely,



Principal Officer (Principal Adviser) – National Delivery  
Wildlife Licensing – Chargeable Advice and Strategic Casework  
Natural England Wildlife Licensing Service

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Date: 11 March 2026  
Our ref: Norwich to Tilbury (2025-72559-EPS-AD1)  
(NATIONALLY SIGNIFICANT INFRASTRUCTURE  
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██████████  
Senior Consents Manager  
National Grid

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0300 060 3900

Dear ██████████,

**DRAFT MITIGATION LICENCE APPLICATION STATUS:** Initial Draft Application  
**LEGISLATION:** The Conservation of Habitats and Species Regulations 2017 (as amended) /  
The Wildlife and Countryside Act 1981  
**NSIP:** Norwich to Tilbury  
**SPECIES:** Water Vole (*Arvicola terrestris*)\*

Thank you for your draft water vole licence application documents submitted to Natural England in association with the above-referenced NSIP site. As stated in our published guidance, once Natural England is content that the draft licence application is of the required standard, we will issue a 'Letter of No Impediment'. This is designed to provide the Planning Inspectorate and the Secretary of State with confidence that the competent licensing authority sees no impediment to issuing a licence in future, based on information assessed to date in respect of these proposals.

Following our further assessment of the submitted draft application documents, I can now confirm that, on the basis of the information and proposals provided, **Natural England sees no impediment to a licence to derogate for impacts to water voles being issued**, should the DCO be granted.

However, please note the following issues as discussed and commented on in the subsequent paragraphs have been identified within the current draft of the Method Statement document and associated documents, and these will need to be addressed before the licence application is formally submitted.

#### Application Form

Natural England will expect that the eventual proposed Named Ecologist will be suitably qualified and experienced with respect to water vole licensing and managing large projects. The case reference numbers for previous water vole mitigation licences held should be provided as part of any formal licence submission. Where an ecologist has not held a water vole mitigation licence issued within the last three years at the point of submitting the formal licence application, sufficient information needs to be provided to determine that the ecologist is suitably skilled and experienced to manage a range of water vole mitigation schemes of varying complexity.

Additional information demonstrating the ecologist's experience should be provided in the formal licence application; in particular evidence of:

- The ecologist's understanding of and involvement in water vole impact assessments, for at least 3 mitigation licences.
- The ecologist's understanding of and involvement in water vole mitigation design, including compensation, for at least 3 mitigation licences.
- The ecologist's understanding of and involvement in significant habitat works, for at least 3 mitigation licences.
- The site names and reference numbers for all water vole mitigation licences that the ecologist has worked on, including the capacity in which the ecologist worked under each licence. Where licences not issued by Natural England are being submitted as supporting evidence, copies of said licences should be provided alongside a brief description, and details of the mitigation works that were involved.

In addition to this, where an ecologist has not held a water vole mitigation licence issued within the last three years, two written references of support are needed to help demonstrate the ecologist has sufficient knowledge and experience to hold a mitigation licence. References provided in support of the ecologist's licence application should:

- State how long referees have known the named ecologist, and in what capacity. Where referees and ecologists have worked together, place of work should be specified. Please note: both referees should not be from the same company, and the current place of work should be provided.
- At least one of the references must have held a water vole licence in the past 3 years.
- Provide reference numbers for mitigation projects where the referee has worked alongside the ecologist, including a brief description of mitigation works involved.
- Indicate the ecologist's water vole knowledge and experience in relation to relevant legislation, survey experience, mitigation techniques, participation in other mitigation schemes and understanding of requirements for water vole method statements.

This is not an exhaustive list of required information, and the ecologist and referees should utilise these recommendations alongside the guidance within Section 10 of the Application Form for the formal licence application.

### Survey Information

The survey effort as undertaken to date includes information from desk studies and habitat suitability assessments, and from in-field studies with appropriate seasonal timings and coverage, and broadly aligns with Natural England's expectations around adherence to best practice. It is noted that surveys have focused on single visits only in most cases, and on confirming presence/absence only rather than on population size assessments; however, it is acknowledged that further survey effort to be carried out post-consent will incorporate surveys to identify the location and number of latrines, and burrow positions, to provide a fuller picture of population sizes to inform the final licence application. Natural England welcomes this commitment and would encourage as much survey work as is necessary to build a robust understanding of the population sizes of water voles to be impacted. Further and more targeted survey effort should be undertaken in areas where the highest impacts to water voles and their habitats are anticipated.

### Impact Assessment

In general, Natural England is satisfied with the assessment of the impacts to water voles and their habitats as a result of the proposed scheme and associated works. However, whilst it is acknowledged that the impacts from the project are largely temporary when considered in the context of construction programmes and human timescales, given that the typical lifespan of a water vole in the natural environment varies between five months and two years, a four-year project and its associated impacts, particularly those impacts that may cause severance of

connectivity between habitats, represents a significantly greater impact to affected water voles than it would were it affecting more longer-lived animals.

The project may result in impacts to affected water voles' entire lifetimes and/or multiple generations, and as such, Natural England would expect to see specific and further discussion of this point, alongside evidence of how such impacts will be mitigated for, or, appropriate justification as to why the project team feels these impacts are either unlikely to occur or will not result in significant negative effects to water voles. It may be, for example, that sufficient habitat connectivity will be retained in and around areas where water voles are present and where new culvert or bridge infrastructure will be installed for the full four-year period to mitigate any impacts from habitat severance within channels and water courses.

### Mitigation Proposals

Natural England welcomes the use of the avoidance and mitigation measures outlined in the mitigation strategy; namely the commitment to water course demarcation, pollution control measures, and sensitive construction design. Natural England also welcomes the commitment to undertake further pre-construction surveys in line with best practice guidelines and expectations. As commented on previously, where there are potential areas of higher impacts to water voles and their habitats as a result of proposed works, the survey effort should be scaled and intensified in these areas as appropriate.

With regards to the proposed displacement strategy, the commitment to undertake these activities in line with best practice guidance is noted and welcomed, and the proposed approach largely aligns with Natural England's expectations with respect to licensing.

However, displacement during the autumn window is currently proposed to occur between 15th September and 30th November. Although this extended window into and up until the end of November is referenced in some updated guidance documents and reference materials, Natural England's preference would be for displacement activities in the autumn window to be concluded prior to the end of October of each year, in line with the approach permitted via the CL31 Class Licence for water vole displacement activities. If displacement activities are to occur beyond the end of October and into November within any year as required, then it would be useful to have some justification from the project team as to why this may be required and is considered appropriate, and, for detail on how any associated risks will be managed. For example, it may be helpful for an explicit commitment to be included in the proposed methodology for displacement activities to state that vegetation removal and associated destructive searches will not be undertaken when temperatures are less than 5°C; a similar commitment to the condition as included on the CL31 Licence.

It is also noted that vegetation clearance and removal on the bank faces and tops is proposed to cover 3m either side of the working areas in addition to the working areas themselves. Best practice guidelines typically require a 5m buffer either side of working areas. Further consideration should be given to extending these areas up to the normal 5m buffer, and either the approach amended accordingly, or, suitable justification as to why only a 3m buffer is appropriate should be provided.

### Compensation Proposals & Post-Development Monitoring and Management

No specific habitat creation during works is proposed, but activities to enhance habitats for water voles are proposed to take place following the completion of works and in areas where there are opportunities to provide better habitats than those identified prior to works occurring. This commitment is welcomed by Natural England. It is also noted that measures to ensure the project complies with BNG requirements are proposed. Again, Natural England welcomes these, but it should be noted that measures intended to deliver BNG commitments may not necessarily be wholly sufficient to deliver for wildlife licensing requirements. NE's typical position is that measures provided as part of wildlife licensing mitigation and compensation habitats can only be used to demonstrate maintenance of the no net loss element of BNG; they cannot be

used as part of any additional habitat measures as provided to achieve any BNG net gain requirements.

The proposal to carry out a five-year monitoring plan including checks of water vole habitats to ensure their suitability is welcomed, as are the management plan proposals committing to undertake appropriate habitat management actions on all watercourses subject to displacement.

### Licensable Routes

Whilst it is acknowledged that the project is primarily seeking a bespoke project-wide A11-type mitigation licence to cover impacts relating to water voles and their habitats, there may be potential for the CL31 Class Licence to be used to undertake at least some of the works resulting in temporary impacts to water vole habitats along the project route, and Natural England would encourage the applicant and project team to consider the use of the CL31 Licence if and where appropriate, and for discrete sections along the footprint of the scheme.

Where there may be water vole habitats occurring in the same general area, but where these impacted water vole habitats are functionally separate from each other rather than being sections along the same bank, and where it can be clearly shown or inferred that such habitats are not likely to be used by the same water voles, the use of the CL31 Licence may be appropriate.

For areas of the scheme where the CL31 Licence approach may not be applicable, particularly where the proposed impacts go beyond the scope of the CL31 and/or where multiple impacts to connected watercourses are anticipated, a bespoke project-wide licence based on the fundamentals of the A11 mitigation licence for water voles will be required.

Based on Natural England's review of the submitted Method Statement to Support a Project Licence Application document, the proposals broadly align with and evidence the approach that Natural England would want to see captured as part of a bespoke project licence for the Norwich to Tilbury scheme. However, further and specific detail on the points as highlighted in the previous paragraphs would be required to assist Natural England in further progressing any draft project licence to be permitted and issued following the project securing the required DCO consent. Relatedly, given the bespoke nature of any project-wide licence for water voles likely to be provided to the Norwich to Tilbury scheme, it is likely that ongoing engagement between the project team and their environmental representatives and Natural England's Wildlife Licensing Service (NEWLS) will be required ahead of the DCO being determined and the formal licence being sought.

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\*The scientific name for the Water Vole has changed. In England the new scientific name is *Arvicola amphibius*. However, the law applies to the name given in the legislation (in this case the Wildlife & Countryside Act 1981 (as amended)) therefore for the purpose of this licence the Water Vole will be referred to as *Arvicola terrestris*."

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### **Next Steps**

Should the DCO be granted then the mitigation licence application must be formally submitted to Natural England. At this stage any modifications to the timings of the proposed works, e.g. due to ecological requirements of the species concerned, must be made and agreed with Natural England before a licence is granted.

If other minor changes to the application are subsequently necessary, e.g. amendments to the work schedule/s then these should be outlined in a covering letter and must be reflected in the

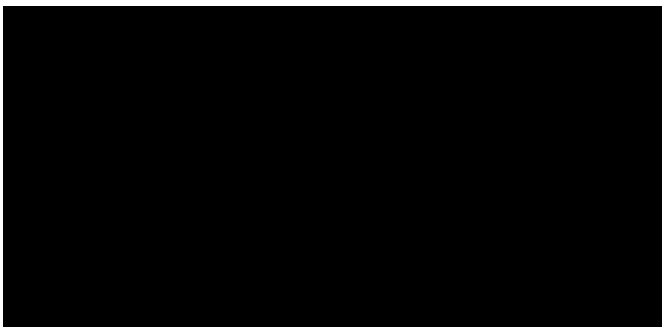
formal submission of the licence application. These changes must be agreed by Natural England before a licence can be granted. If changes are made to proposals or timings which do not enable us to meet reach a 'satisfied' decision, we will issue correspondence outlining why the proposals are not acceptable and what further information is required. These issues will need to be addressed before any licence can be granted.

I should also be grateful if an open dialogue can be maintained with yourselves regarding the progression of the DCO application so that, should the Order be granted, we will be in a position to assess the final submission of the application in a timely fashion and avoid any unnecessary delay in issuing the licence.

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is, therefore, not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

I hope the above has been helpful. However, should you have any queries then please do not hesitate to contact me.

Yours sincerely,



Principal Officer (Principal Adviser) – National Delivery  
Wildlife Licensing – Chargeable Advice and Strategic Casework  
Natural England Wildlife Licensing Service

[Matthew.Gill@naturalengland.org.uk](mailto:Matthew.Gill@naturalengland.org.uk)

Date: 06 May 2026  
Our ref: N2T Bats  
Your ref:



Freepost N TO T  
**By email only:** [contact@n-t.nationalgrid.com](mailto:contact@n-t.nationalgrid.com)

Customer Services  
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T 0300 060 3900

Dear [REDACTED],

### **Norwich to Tilbury – Further information in relation to the NE Advice Letter of the 30 March 2026 relating to Bats**

Natural England provides the following advice which aims to provide further clarity to the examining authority for the Norwich to Tilbury Nationally Significant Infrastructure Project regarding our position on UK bat species protected under The Conservation of Habitats and Species Regulations 2017 (as amended) and The Wildlife and Countryside Act 1981. It is provided without prejudice to the information contained in that letter.

Natural England has liaised with you, the Applicant, regarding the bat tree roost survey scope in advance of bat surveys being undertaken, to ensure sufficient baseline data was collected to support the assessment of impact on bats within the Environmental Impact Assessment. The bat survey scope has taken into account the geographical location, large scale and nature of impacts of the proposed Project.

Natural England are broadly content that through the Ground Level Tree Assessments, Advanced Licensed Bat Survey Techniques, Bat Activity and targeted Barbastelle surveys undertaken by the Applicant to date, that the baseline data collected is sufficient to support the Environmental Impact Assessment and to make a reasonable assessment of the likely effects and significance of effects on bat populations, as presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity Revision B [AS-026].

The Project as currently proposed has not identified any impacts to bats which would likely constitute an offence under the legislation and therefore require a licence, hence any proposals at this time to address future and currently unknown impacts to bats would be precautionary, and therefore prevent Natural England from issuing a Letter of No Impediment as we would typically do where licensable impacts have been confirmed.

Pre-construction bat roosting surveys will be undertaken by the Applicant post-consent and the results of these surveys will be needed to inform a potential future bat licence application, in the event a bat roost/s to be lost is identified. Broad principles of bat mitigation have been discussed with the Applicant and Natural England will continue to work with the Applicant on any future bat licence application, to maintain the Favourable Conservation Status of the bat species recorded utilising the habitats across the Project.

Yours sincerely,

[REDACTED]  
Sustainable Development Senior Officer – West Anglia

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