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Dear Sir/Madam,

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

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.

Natural England's response to the Examining Authority's written questions and requests for information (ExQ1): Issued on 20 March 2026

In response to the Examining Authority's questions to Natural England on best and most versatile (BMV) agricultural land and soils, Natural England has advised that it has sought further input from its specialist soils advisers to inform a detailed position. While that specialist advice has not been available within the timescale for this examination deadline, Natural England were engaged throughout the development and implementation of the predictive Agricultural Land Classification (ALC) grading methodology, including ongoing consultation on its scope, application and precautionary nature. On that basis, Natural England has confirmed that it remains broadly content with the approach adopted to date, pending receipt of specialist input.

LUS 1.2

Best and most versatile agricultural land (BMV) and soils - 1 It would appear from Paragraph 6.4.7 of the ES that detailed Agricultural Land Classification (ALC) survey was undertaken on approximately 1,011 ha (representing 54% of the proposed survey areas within the Order Limits). Predictive ALC grading was then carried out where it was not possible to undertake a detailed ALC survey. Given the coverage of actual survey work how much confidence can be placed on the applicants response on acid soils in document 8.4.6 page 22 that 'the detailed surveys did not identify the presence of jarosite in the soil and in locations where desk-based information suggested a potential for acid sulphate soils some of the soils were found to be moderately calcareous. There is no evidence to indicate the presence of actual or potential sulphate soils within the surveyed areas'. As being a representative conclusion that can be applied across the whole Order Limits as they are not all 'surveyed areas'.

Extent and nature of survey coverage

The ES confirms that detailed ALC and soil surveys were undertaken over approximately 1,011 ha, representing 54% of the proposed survey areas within the Order Limits. These surveys were prioritised in areas of permanent infrastructure and wider Order Limits where land access was available, and were supplemented by soil pits and deeper augering (to ~2 m) at representative locations, including targeted sampling within the Waveney Valley floodplain, specifically to test for peat and potentially acid sulphate soils.

For the remaining unsurveyed areas (approximately 856 ha), a predictive ALC and soil assessment was carried out on a 100 m (≈1 ha) grid across the entire Order Limits, integrating:

- National soil maps (NATMAP),
- Geological mapping,
- Desk-based soil association data,
- Detailed survey results (used to refine and ground-truth the model),
- Professional soil science judgement.

The use of predictive ALC grading to supplement areas where access was restricted is a pragmatic solution, especially when grounded in MAFF's revised guidelines and supported by high-quality baseline data. While predictive grading cannot replicate the precision of field-based surveys, its application across the full draft Order Limits allows for a comparative analysis that can validate the model's reliability and identify any systematic over- or underestimation of BMV land. The commitment to complete outstanding surveys post-submission and pre-construction is a critical safeguard, ensuring that the Soil Management Plan (SMP) is informed by the most accurate and site-specific data available. This staged approach supports responsible soil handling and reinstatement practices, however currently, it should be recognised that this approach does not align with best practise in land use planning.

Evidence relating to acid sulphate soils

The specific ES statement referenced by the Examiner (Applicant response 8.4.6, p.22) – that: “the detailed surveys did not identify the presence of jarosite in the soil and in locations where desk-based information suggested a potential for acid sulphate soils some of the soils were found to be moderately calcareous... There is no evidence to indicate the presence of actual or potential sulphate soils within the surveyed areas” is supported in Chapter 6 by the following evidence:

- Targeted deeper soil sampling in the Waveney Valley (a recognised higher-risk setting for such soils) explicitly tested for potential acid sulphate conditions and found none, identifying only organic-rich (peaty) soils.
- Soil associations mapped across the Project are predominantly calcareous or base-rich clayey and loamy soils, particularly in the eastern and southern sections, which geochemically reduces the likelihood of acid sulphate soil development.
- No jarosite or indicative sulphidic horizons were identified in either the detailed surveys or the targeted floodplain investigations.

Applicability of conclusions to unsurveyed areas

It is acknowledged in the ES that predictive mapping “is not definitive” and has limitations compared to direct survey. However, several factors support reasonable confidence that the absence of acid sulphate soils can be cautiously extrapolated across the Order Limits:

1. High survey coverage for a linear NSIP – 54% detailed survey coverage, supported by targeted deeper investigations, is relatively extensive and exceeds reliance on Provisional ALC mapping alone.
2. Representative sampling of highest-risk environments – floodplain and organic-rich contexts were specifically investigated.
3. Ground-truthing of predictive data – predictive outputs were checked against surveyed areas to assess under- or over-estimation.
4. Commitment to post-consent soil surveys – the ES clearly states that Soil Resource Surveys will be undertaken post-consent / pre-construction in unsurveyed areas to inform the final Soil Resource Plan (SRP).

Conclusion on LUS1.2

While the conclusion on the absence of acid sulphate soils is formally limited to the surveyed areas, the combination of extensive field data, targeted investigation in sensitive settings, predictive modelling validated by Natural England, and secured pre-construction surveys provides a reasonable and precautionary level of confidence. Importantly, the ES does not rely on this conclusion alone, as further surveys are embedded as a future requirement before construction.

LUS 1.4

BMV and soils - 3 To what extent are the mitigation measures proposed by the applicant in the outline CoCP (measures GH02 and GH08) sufficiently robust to address issues should acid sulphate soils be encountered during construction.

Natural England is not the statutory consultee in respect of land contamination matters, which are addressed through mitigation measures GH02 and GH08. Responsibility for regulating and advising on contaminated land risks lies instead with the Local Planning Authority and the Environment Agency, reflecting the fact that GH02 and GH08 are concerned specifically with the prevention, assessment and management of contamination pathways and risks during construction.

Natural England advises on the protection of soils and Best and Most Versatile (BMV) agricultural land within the planning system, acting as a statutory consultee in specific circumstances set out in legislation. While Planning Authorities are responsible for applying Government planning policy, Natural England must be consulted on certain development plans, environmental assessments, and development proposals, including Environmental Impact Assessment developments, Nationally Significant Infrastructure Projects (NSIPs), and minerals and waste schemes involving restoration to agriculture. Under the Development Management (Procedure) Order, Natural England is consulted on planning applications that conflict with an adopted development plan and involve, or may involve, the loss of 20 hectares or more of BMV land, often including large-scale or speculative developments. It also advises on minerals and waste applications restored to agriculture under Schedule 5 of the Town and Country Planning Act 1990, focusing on soil handling, restoration quality, and aftercare. For NSIPs, Natural England's approach aligns with national policy requirements, with early pre-application engagement playing a key role in influencing design and reducing impacts on BMV land and soils. Matters within Natural England's remit focus on the sustainable use, handling and restoration of soil resources, rather than contamination control per se.

The commitments secured through GH02 and GH08 complement, but do not overlap with, Natural England's advisory role, as they provide a precautionary framework to ensure that construction activities do not give rise to contamination risks that could indirectly undermine soil quality, agricultural productivity or wider environmental receptors. Protection of BMV land is instead addressed through the Outline Soil Resource Plan and wider Code of Construction Practice commitments, which secure appropriate soil stripping, storage, handling, reinstatement and timing of works to maintain soil structure and long-term agricultural capability.

Accordingly, while Natural England's interests in agricultural land and BMV soils are fully recognised and addressed elsewhere within the DCO framework, it is not the statutory consultee for the contamination-specific controls secured through GH02 and GH08, which fall within the remit of other regulatory bodies.

Matters still under consideration

As expressed in the most recent draft of our Statement of Common Ground with National Grid, we understand that the only matter that still requires resolution relates to Ancient Woodland. We have sought the input of specialists and will provide an update at the earliest opportunity.

For any further advice on this consultation please contact the case officer Jamie Melvin and copy to consultations@naturalengland.org.uk.

Yours faithfully,


Sustainable Development Senior Officer – West Anglia