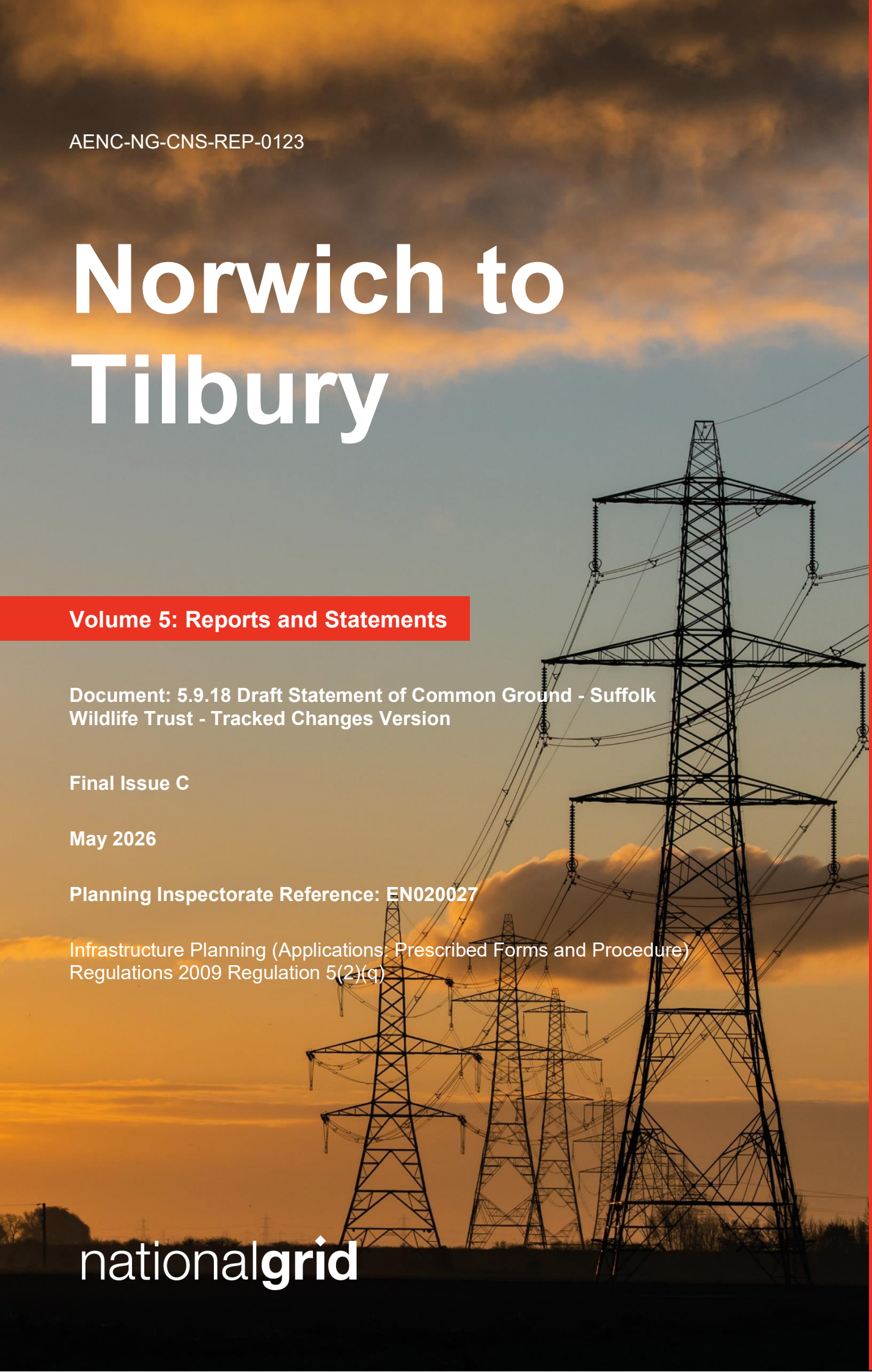
AENC-NG-CNS-REP-0123

Norwich to Tilbury



Volume 5: Reports and Statements

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Final Issue C

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Revision History

Version	Date	Submitted at
A	29 August 2025	DCO Application
B	26 February 2026	Deadline 1
C	12 May 2026	Deadline 4

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Suffolk Wildlife Trust
Draft Statement of Common Ground

1. Purpose of the Statement of Common Ground

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

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

2. Parties to the SoCG

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

3. Summary of matters under discussion

As requested by the Examining Authority, the below table provides an 'at a glance' summary of matters which are under discussion, together with a deadline by which such matters are expected to be resolved.

SoCG ID	Summary of matter under discussion	Deadline for resolution
7.1 - WaLOR Project	**Formalisation of WaLOR liaison and detailed design interfaces** Notwithstanding agreement in principle on project compatibility, Suffolk Wildlife Trust has requested that more specific and enforceable provisions are included to govern how detailed design will be progressed in consultation with the WaLOR Project team. This request was discussed at the meeting held on 1st May 2026, including through the presentation on the Statement of Common Ground outstanding issues between National Grid and Suffolk Wildlife Trust. In particular, Suffolk Wildlife Trust seeks assurance that the Main Works Contractor, including UK Power Networks, will agree relevant detailed design	Likely to be Deadline 7.

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SoCG ID	Summary of matter under discussion	Deadline for resolution
	parameters with the WaLOR Project team to ensure that construction and operational elements of the Norwich to Tilbury Project do not constrain delivery of WaLOR objectives, including river restoration, floodplain processes and long-term habitat creation. The form, scope and enforceability of this detailed design engagement remain subject to further discussion under item 6.1. **Bird diverters South of RG88** Notwithstanding the above, Suffolk Wildlife Trust has requested that bird diverters are also installed on the overhead line south of Pylon RG88 between the pylon and the road. This location-specific request has not yet been agreed and remains subject to further discussion.	
7.2 - County Wildlife Sites (CWSs) in Suffolk	Notwithstanding agreement in principle, Suffolk Wildlife Trust has requested that the Outline Landscape and Ecological Management Plan (LEMP) includes wording to state a preference, where practicable, for the use of green hay from local sources to protect local seed banks and support the reinstatement of habitats in County Wildlife Sites. This request relates to detailed wording within the Outline LEMP rather than the acceptability of the mitigation approach	Likely to be Deadline 7.

4. ~~3.~~ Background

4.1 ~~3.1~~ Description of the Project/Development

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

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

  - Approximately 21 km of 400 kV underground cabling, some of which would be located through the Dedham Vale National Landscape (an Area of Outstanding Natural Beauty (AONB1).
- Up to seven new CSE compounds (with permanent access) to connect the overhead lines to the underground cables.
- Modification works to connect into the existing Norwich Main Substation and a substation extension at the existing Bramford Substation.
- A new 400 kV substation on the Tendring Peninsula, referred to as the EACN Substation (with a new permanent access). This is proposed to be an Air Insulated Switchgear (AIS) substation.
- A new 400 kV substation to the south of Orsett Golf Course in Essex, referred to as the Tilbury North Substation (with a new permanent access). This is proposed to be a Gas Insulated Switchgear (GIS) substation.
- Modifications to the existing National Grid Electricity Transmission overhead lines to facilitate the connection of the existing network into the new Tilbury North Substation to provide connection to the Tilbury Substation.
- Ancillary and/or temporary works associated with the construction of the Project.

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

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

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

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

5. ~~4.~~ Stakeholder Interests

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

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

Suffolk Wildlife Trust's interests also include;

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

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

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

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

- 2022

  - National Grid presented information on how the Project was evolving from the evaluation of strategic options to a preliminary preferred graduated swathe within which new infrastructure (pylons and underground cables) could be located as well as a proposed new substation site on the Tendring Peninsula, as described within the Corridor and Preliminary Routeing and Siting Study Report (April 2022)
  - 21 April -- 16 June ~~non-statutory~~non-statutory consultation: Suffolk Wildlife Trust comments included matters relating to the route selection process, protected sites in the Waveney Valley, bird collision risk, County Wildlife Sites, Priority Habitats, Network Expansion Zones, undergrounding impacts in Dedham Vale National Landscape, and Biodiversity Net Gain.
- 2023
  - Development of the 2023 Preferred Draft Alignment, responding to feedback and other studies, as described within the Design Development Report (June 2023)
  - 27 June -- 21 August ~~non-statutory~~non-statutory consultation on the 2023 Preferred Draft Alignment: Suffolk Wildlife Trust comments included matters relating to impacts to the WaLOR project, Dedham Vale National Landscape, and the River Gipping CWS and Sproughton Park CWS, as well as additional Biodiversity Net Gain comments.
  - August -- Meeting to discuss Biodiversity Net Gain -- potential ~~off-site~~off-site scheme/initiatives
- 2024
  - Development of the 2024 Preferred Draft Alignment, responding to feedback and other studies as described within the Design Development Report (April 2024) and Preliminary Environmental Information Report (PEIR) (April 2024).
  - 10 April -- 26 July Statutory Consultation on the 2024 Preferred Draft Alignment: Suffolk Wildlife Trust comments included the River Waveney crossing and impacts to the WaLOR project, with additional comments on protected species, protected sites, the crossing of the Dedham Vale National Landscape, Biodiversity Net Gain, and more general biodiversity considerations.
  - 17 March meeting between National Grid and Suffolk Wildlife Trust to discuss the Waveney and Little Ouse Landscape (WALOR) Recovery project area
  - 11 November meeting between National Grid and Suffolk Wildlife Trust to discuss BNG -related matters
- 2025
  - Development of the proposed Project Alignment prior to DCO submission, considering feedback and other studies
  - 30 January -- 3 March Consultation for Suffolk on proposed changes to the underground cable alignment: Suffolk Wildlife Trust comments included the Waveney crossing pylon location and the proposed undergrounding of an existing overhead lines (OHL) at Thrandeston Marsh CWS.

- 11 March -- Meeting to discuss BNG and WaLOR project in relation to the Project
- 24 April -- Meeting between National Grid and Suffolk Wildlife Trust and WALOR to discuss offsite BNG and tree planting
- 10 July -- Meeting between National Grid and Suffolk Wildlife Trust and WALOR to discuss offsite BNG
- 14 July 2025-- Meeting to discuss the SoCG with Essex Wildlife Trust, Suffolk Wildlife Trust and Norfolk Wildlife Trust (NWT).
- 15 September 2025 – National Grid provided the relevant Environmental Statement documents for consideration including the Outline Landscape and Ecological Management Plan and Outline Code of Construction Practice.
- 24 September 2025 – Meeting to discuss comments and queries on the Environmental Statement with Essex Wildlife Trust, Suffolk Wildlife Trust and Norfolk Wildlife Trust.
- 11 November 2025 – Meeting between National Grid and Suffolk Wildlife Trust and WALOR to discuss offsite BNG
- 9 December 2025 – Meeting to discuss the Statement of Common Ground with Essex Wildlife Trust, Suffolk Wildlife Trust and Norfolk Wildlife Trust.
- 6 January 2026 – Meeting to discuss the WaLOR project with Suffolk Wildlife ~~Trust~~TrustWT and Environment Agency.
- 13 January 2026 – Meeting between National Grid and Suffolk Wildlife Trust WT and WALOR to discuss offsite ~~BNG~~BNGuffolk Wildlife Trust and Environment Agency.
- 13 January 2026 – Meeting between National Grid and Suffolk Wildlife Trustuffolk Wildlife Trust to discuss outstanding issues in the SoCG.

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6. ~~5.~~ Matters Agreed

ID	Issue	Agreement Reached	Date agreed	Relevant documentation
~~5.1~~6.1	Waveney Valley Alternative	National Grid has concluded, based on its own technical assessments, that an undergrounding option that *a) avoids the need for open trenching through parts of the floodplain that contain peat soils that are the focus of floodplain habitat restoration proposals* and *b) achieves sufficient buried cable depth to prevent potential issues for proposed stage zero river restoration and restoration of floodplain wetland habitats* is not achievable. SWT agree that in these circumstances an undergrounding option through the Waveney Valley in the proposed location would not be compatible with the WaLOR Project.	24/04/2025	N/A

~~6. Matters Currently Under Discussion~~

~~ID~~	~~Issue~~	~~Suffolk Wildlife Trust position~~	~~National Grid response~~	~~Relevant documentation~~
~~6.1~~6.2	~~WaLOR~~WaLOR Project	**Project compatibility with the WaLOR Project** ~~Comments provided as part of the Relevant Representation submitted in November 2025:~~ ~~• SWT identify that there is the potential for the Project to impact the Waveney and Little Ouse Landscape Recovery Project (WaLOR) and the delivery of its vision for nature recovery in the wider Upper Waveney Valley in which Suffolk Wildlife Trust is the lead partner alongside the Environment Agency and 15 other landowners.~~	~~• National Grid is committed to continuing to collaborate with the~~	~~**Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**~~ ~~**Environmental Statement**~~

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ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		• SWT note that a key component of the WaLOR project is the restoration of the section of the River Waveney and its floodplain crossed by the Project to a more natural course and function. They note that it is imperative that not only pylon location, but any permanent or temporary access required at construction or operational stage, will not impact the habitat restoration and creation proposals of the WaLOR project, including the river restoration, and that the design, construction, and operation of the Norwich to Tilbury project is compatible with the restoration of natural processes in the river valley, which include the natural migration of the river channel. • SWT note that the construction of temporary haul roads and provision of permanent access required for the operational lifetime of the Project could impact habitat creation (outside of that proposed for the river channel) undertaken as part of the WaLOR project, including impacts to habitats where biodiversity, carbon, or other environmental credits have been, or would be, created. • The potential for bird strike in the upper Waveney Valley where, as part of the WaLOR project there are proposed works to increase biodiversity value for birds moving up and down the river valley. Should future monitoring indicate that bird diverters proposed as mitigation are insufficient to prevent significant impacts on local bird populations from collision with pylons and overhead lines, there should be a commitment from National Grid to provide suitable compensation and additional mitigation measures. • Where undergrounding of existing 132kV overhead lines is being considered in the Waveney Valley, it must avoid impacts to ecologically	WaLOR project to ensure both projects can be successfully delivered. • National Grid has sought to minimise impacts on the Waveney and Little Ouse Landscape Recovery (WaLOR) project as far as practicable. The construction haul road has been removed between	**Figure 4.1 – Proposed Project Design [APP-133]** **Environmental Statement Chapter 13 – Landscape and Visual [APP-226]** **Outline Landscape and Ecological Management Plan [AS-046]**N/A

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		valuable habitats, peat soils, and the delivery of the WaLOR project, including river and floodplain restoration.Suffolk Wildlife Trust identified the potential for the Norwich to Tilbury Project to interact with the Waveney and Little Ouse Landscape Recovery (WaLOR) Project, particularly in relation to floodplain processes, habitat restoration and access. National Grid recognises the importance of the WaLOR Project and has engaged constructively with Suffolk Wildlife Trust, the WaLOR Project team and the Environment Agency, including through joint meetings. Design refinements have been made to minimise impacts within the Waveney Valley, including removal of a haul road, limiting permanent access to existing rights of access only, and securing mitigation through the Outline Landscape and Ecological Management Plan. On this basis, the principle that the Norwich to Tilbury Project can be delivered in a manner compatible with the WaLOR Project is agreed subject to suitable wording to secure liaison with the WaLOR Project team is incorporated into the Outline LEMP (see matters currently under discussion below).	pylons RG87–88. The permanent access is a right of access only for ongoing maintenance, i.e. no physical permanent works are required and impacts on the WaLOR project would be minimal. • National Grid is committed to ongoing collaboration with the WaLOR	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			project team and the Main Works Contractor(s) would seek to engage with the WaLOR project team during detailed design development, to reduce any potential for conflicts between the two projects. • The Project has included bird diverters at the	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			Waveney Valley on a precautionary basis, acknowledging that the proposed WaLOR proposals would likely increase the area's value for wintering birds. The inclusion of bird diverters is considered sufficient mitigation for any potential future increase in value and would mitigate any	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			concern over collision risk. • Landscape mitigation is set out in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. There are no proposals to underground existing 132 kV overhead lines in the Waveney Valley. Short sections of existing 11 kV and 33 kV wood pole lines would be removed to	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			accommodate the Project and undergrounded as shown on **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]** pages 10 and 11. Undergrounding works will be minimal and have limited short term impacts on habitats in the Waveney Valley. Reinstatement of vegetation is set out in the **7.4 Outline**	

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ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			Landscape and Ecological Management Plan [AS-046]. 01/05/2026	
6.3	WaLOR Project	**Bird diverters within the Waveney Valley** Agrees that the provision of bird diverters between pylons RG87 and RG88 is acceptable mitigation for this section of the route, they have requested diverters be installed south of RG88 between the pylon location and Ling Road close to the stream corridor (see matters currently under discussion below).	01/05/2026	N/A
6.26.4	County Wildlife Sites (CWSs) in Suffolk	Comments provided as part of the Relevant Representation submitted in November 2025 • SWT have concerns regarding the proposals at Sproughton Park CWS and the onsite reptile population which could be directly impacted during both pylon construction and the undergrounding of existing overhead lines. The undergrounding also crosses the entirety of the site, which has the potential to sever the population, potentially isolating individuals from hibernacula or impacting the short-term breeding success. • Where impacts to CWS are unavoidable, care in 'micro-siting' of cable route to prevent impacts to the most ecologically important habitat is needed together with well-designed and executed habitat restoration works; these should aim to deliver habitats to the same or better condition. To compensate for any loss, be it considered temporary or	• Sproughton Park County Wildlife Site (CWS) was surveyed for reptiles and subsequently identified as a key reptile site within 6.8.A6	Outline Landscape and Ecological Management Plan [APP-046] Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026] Outline Code of Construction Practice

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ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		not, measures should seek to enhance the wider CWS for its designated features and other nature conservation priorities as appropriate. • Roydon Fen Local Nature Reserve and CWS lies adjacent to the route, and we continue to have concerns about the potential for impacts to the sensitive onsite hydrology from works in the adjacent floodplain, as well as the impacts from vegetation management required for the construction and operation of overhead lines. (see also comments below on River Waveney Crossing).Suffolk Wildlife Trust raised concerns regarding potential impacts on County Wildlife Sites within Suffolk, including Sproughton Park CWS and Roydon Fen LNR/CWS, particularly in relation to habitat disturbance, reptile populations and hydrological sensitivity. National Grid has assessed these potential impacts through the Environmental Statement and confirmed that impacts would be localised, temporary and reversible, with habitats reinstated following completion of works. Mitigation, reinstatement and long-term management measures are secured through the Outline Landscape and Ecological Management Plan and the Outline Code of Construction Practice, with detailed design incorporating micro-siting to avoid ecologically valuable areas where practicable. Hydrological safeguards are in place to protect Roydon Fen, and no long-term residual effects on County Wildlife Sites are predicted. On this basis, Suffolk Wildlife Trust agrees that impacts to County Wildlife Sites are appropriately assessed and mitigated in principle.	Environmental Statement Appendix 8.6 - Reptile Report [APP-164]. The 7.4 Outline Landscape and Ecological Management Plan [AS-046] already sets out mitigation measures for reptiles at key reptile sites and this includes Sproughton Park CWS.	[APP-300] Biodiversity Net Gain Report [APP-299] Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] Environmental Statement Chapter 12 - Hydrology, Land Drainage and Flood Risk [APP-221]N/A

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			The impacts associated with the 132 kV undergrounding would be relatively short-term and small scale. All impacts would be temporary and habitats will be returned to baseline conditions on completion and would be available for reptiles in the medium to long term. • National Grid	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			is committed to avoiding and minimising impacts to important ecological features, including CWSs, wherever practicable. The detailed design stage would include micro-siting to ensure avoidance of key areas of ecological value where practicable in line with	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			commitments made within the **7.2 Outline Code of Construction Practice [APP-300]**. Habitats would be returned to existing baseline value and condition, unless identified within the **7.1 Biodiversity Net Gain Report [APP-299])**, with additional enhancement	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			measures proposed. Details will be included within a final Landscape and Ecological Management Plan. • National Grid has assessed the potential hydrological impacts of the Project on Roydon Fen Local Nature Reserve and CWS in **6.8 Environmental**	

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ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			Statement Chapter 8 - Ecology and Biodiversity [AS-026] and 6.12 Environmental Statement Chapter 12 – Hydrology, Land Drainage and Flood Risk [APP-221], and has secured a range of measures, detailed in the 7.2 Outline Code of Constructi	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			on Practice [APP-300], to maintain and safeguard the hydrology and water quality of the River Waveney and associated habitats. Through the consideration of consultation feedback such as that provided by Suffolk Wildlife Trust and ongoing environmental and engineering studies, the	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			Norwich to Tilbury Project has reduced impacts on CWSs where possible and have detailed appropriate mitigation to ensure no long-term residual effects.01/05/2026	
6.36.5	Licensable Species and Designated Sites	SWT may wish to comment and engage in discussion with the Applicant and Natural England on matters relating to licensable species (e.g. European Protected Species and species listed in Annex 1 of the Wildlife & Countryside Act) and designated sites, in addition to priority species and species of conservation concernNational Grid has progressed species licensing with Natural England across the Order Limits within Suffolk. Letters of No Impediment have been obtained for water vole, hazel dormouse and badger, alongside a signed Impact Assessment and Conservation Payment Certificate for great crested newt, supported by updated ecological survey information submitted in November 2025, which confirms no material change to the conclusions of the Environmental Statement. No impacted bat roosts have been identified; however, National Grid is progressing the Suffolk elements of a project-wide bat licence with Natural England, who	National Grid will continue to engage with Suffolk Wildlife Trust on this matter. Draft licence applications are currently being agreed with Natural England.01/05/	N/A

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		has indicated support for the proposed approach. On this basis, licensable species matters within Suffolk are considered to be appropriately addressed through the statutory process with Natural England and secured DCO commitments, with any remaining discussions focused on detailed implementation and potential monitoring rather than the principle of compliance.	2026	
6.46.6	Biodiversity Net Gain (BNG) Offsite Solutions	National Grid has been engaging in productive discussions with SWTconstructively with Suffolk Wildlife Trust regarding the provision of offsiteoff-site Biodiversity Net Gain units for the Project. National Grid are continuing these discussions with SWT regarding securing the offsite unitsNorwich to Tilbury Project within Suffolk. Both parties acknowledge that discussions are ongoing, with National Grid confirming its commitment to securing the required off-site BNG units as the delivery process progresses. The matter relates to the mechanisms for delivering and securing off-site BNG units rather than the principle of off-site provision, which is accepted. On this basis, the principle of off-site Biodiversity Net Gain is treated as agreed, with ongoing discussions appropriately focused on delivery arrangements beyond the scope of the Statement of Common Ground.	National Grid has been engaging in productive discussions with Suffolk Wildlife Trust regarding the provision of offsite BNG units for the Project. National Grid are continuing these discussions with Suffolk Wildlife Trust regarding securing the offsite	N/A

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			units.01/05/2026	
6.56.7	Peat soils	Comments provided in response to the Statutory Consultation in July 2024: • Detailed mapping of peat soils within the river valley and robust and evidence-basedevidence-based proposals for compensating for any unavoidable loss of peat should be provided. National Grid conducted more detailed peat surveys in the Waveney Valley in late 2024 and determined that organic-rich (peaty) soils were present. Additional mitigation measures for the handling of organic-rich soils have been included in **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303].**	National Grid conducted more detailed peat surveys in the Waveney Valley in late 2024 and determined that organic-rich (peaty) soils were present. Additional mitigation measures for the handling of organic-rich soils have been included in the Outline Soil Resource Plan.01/05/2026	**7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303-303]**
6.66.	Waveney Valley	Comments provided in response to the Statutory Consultation in July 2024:	National Grid	**Outline Code of**

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ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
8	- vegetation clearance	• TheSuffolk Wildlife Trust seek writtensought clarification on the extent and nature of vegetation clearance required within and either side of the working width for the construction ofassociated with the Waveney Valley crossing section of the scheme and extend this to within all areas in the WaLOR Project outside the floodplain where scrub and transitional woodland habitats are proposed. National Grid has confirmed that the 100 m width represents the limit of deviation and does not equate to wholesale vegetation removal. Vegetation clearance will be limited to that required for the final alignment and construction activities, with further reductions sought at detailed design. Vegetation management, reinstatement and enhancement are secured through the Outline Code of Construction Practice and the Outline Landscape and Ecological Management Plan. On this basis, the approach to vegetation clearance within the Waveney Valley is agreed in principle under issue 6.6.	note that the full 100 m width includes the limit of deviation for the overhead route and therefore vegetation within the full extent of the 100 m swathe would not be removed in its entirety. National Grid will seek to reduce the vegetation impact at detailed design.01/05/2026	Construction Practice [APP-300] Outline Landscape and Ecological Management Plan [APP-046]N/A
6.76.9	Biodiversity Net Gain (BNG)	Comments provided in response to the Statutory Consultation in July 2024: • The Trust encourage National Grid to go beyond the 10% commitment and deliver at least 20% net gain across hedgerows and watercourses as	Environment Act 2021 introduces a mandatory	Biodiversity Net Gain Report [APP-299]N/A

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		well as the area habitats already considered. • The Trust note that in addition to net gain across the project, offsetting should be delivered throughout Norfolk, Suffolk, and Essex to ensure that nature recovery is supported at a landscape scale across all three counties in which the project is proposed. Comments provided as part of the Relevant Representation submitted in November 2025: • It is essential that best practice for Biodiversity Net Gain (BNG) is followed and that a strong consideration for the Local Nature Recovery Strategy is included wherever post-development Biodiversity Net Gain units are delivered; the biodiversity value of such habitat can be further enhanced by looking to create habitat of a type or in a location to benefit key species, such as hazel dormice. We acknowledge that there is currently no requirement for mandatory net gain for NSIPs, however as this project has committed to providing a 10% net gain it is important that trading rules and best practice principles are followed throughout • Under BNG's additionality rules, habitat measures delivered to mitigate or compensate for impacts to protected sites and species can only count towards, and not beyond, no-net-loss. To ensure additionality of the Project's 10% BNG, habitat created or enhanced to meet statutory mitigation or compensation for impacts to protected sites or species should be clearly identified in the BNG assessment. • SWT welcome the confirmation in Table 3.2 of Document 7.1 Biodiversity Net Gain Report that any habitat loss will only be considered temporary if reinstatement to the original habitat type and condition within two years is possible, as per statutory Biodiversity Net Gain guidance. Where this is not	requirement for 10% Biodiversity Net Gain (BNG) for development (subject to certain exemptions), however, this requirement is not yet in force for development consent pursuant to a Development Consent Order (DCO). Despite submitting the development consent application before it is mandatory, National Grid has committed to delivering 10	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		possible, habitat loss must be treated as permanent and its replacement required to demonstrate a minimum 10% Biodiversity Net Gain. Where temporary haul roads are made or hedgerows removed this position is essential to ensure the mitigation hierarchy is duly followed.National Grid has committed to delivering a minimum of 10% Biodiversity Net Gain for the Norwich to Tilbury Project on a voluntary basis, aligned with its corporate sustainability objectives and forming the basis of the assessment. In the absence of specific NSIP guidance, the BNG approach and assessment methodology have been agreed in principle with Natural England and relevant local authorities, applying the statutory metric and best-practice principles as set out in the Biodiversity Net Gain Report. Suffolk Wildlife Trust has expressed an aspiration for higher levels of BNG; however, this relates to the level of ambition rather than the acceptability of the approach, which is secured through the DCO. On this basis, the Project's BNG approach, including the commitment to a minimum of 10% net gain, is treated as agreed.	% BNG with wider environmental and societal benefits for the Project. The 10 % BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. In the absence of guidelines for NSIPs, the approach and methodology for the BNG assessment has been broadly agreed in principle with Natural England and Local Planning	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			Authorities. National Grid will consider provision of BNG within areas identified in Local Nature Recovery Strategy (LNRS) areas where sites are available and appropriate to project circumstances as part of the site selection process. The BNG rules around additionality have been applied to the Project. Full details are presented within **7.1**	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			Biodiversity Net Gain Report [APP-299].01/05/2026	
6.86.10	WaLOR Project and Biodiversity Net Gain (BNG)	Comments provided in response to the Statutory Consultation in July 2024: • The Trust has concerns regarding the effects of both the proposed pylon route and the Waveney Valley Alternative on habitat creation and natural riverine and flood plain processes. The creation of Biodiversity Units through habitat creation and enhancement is central to the viability of the WaLOR project and the Trust seek reassurances that we will be consulted regarding how the BNG assessment for the scheme is undertaken at the River Waveney crossing. • The Trust welcome a comparison of Metric calculations for crossing options for the Waveney Valley, which should consider the current baseline and baseline at time of construction should habitat changes as part of the WaLOR project taking place prior to works. • Further clarification is needed on how the project BNG Assessment and the Habitat Units created within the Red Line boundary as part of the WaLOR project will interactSuffolk Wildlife Trust raised comments regarding Biodiversity Net Gain and the need to ensure that the project supports long-term habitat creation and enhancement objectives associated with WaLOR project. National Grid has confirmed that the Project's BNG assessment has been undertaken using the statutory metric, with all habitats within the development footprint considered and off-site BNG delivery proposed where required. The principle of the BNG approach	Conversations with Suffolk Wildlife Trust are ongoing regarding the WaLOR Project and BNG. All habitats within the Order Limits are considered as part of the BNG metric with the Project committing to deliver at least 10% BNG with wider environmental and societal	Biodiversity Net Gain Report [APP-299] Environmental Statement Figure 4.1 – Proposed Project Design [APP-133] Environmental Statement Figure 4.2 – Proposed Project Design – Permanent features [APP-134] Outline Landscape and Ecological

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		and its alignment with WaLOR objectives is agreed under item 6.8, with further discussion focused on delivery mechanisms rather than the acceptability of the approach.	benefits. Post-development habitats would ensure all trading rules are satisfied. • National Grid has sought to minimise impacts on the Waveney and Little Ouse Landscape Recovery (WaLOR) project as far as practicable. The Waveney Alternative (undergrounding) is not being progressed due in part to the impact on the WaLOR and does not form part of the	Management Plan [AS-046].N/A

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			development consent. The construction haul road has been removed between pylons RG87–88 to reduce impacts on the wetland habitats and the WaLOR. The permanent access is a right of access only for ongoing maintenance, i.e. no physical permanent works are required and impacts on the WaLOR project would be minimal. Full details are presented in	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			the Outline Landscape and Ecological Management Plan [AS-046].01/05/2026	
6.96.11	Thrandeston Marsh CWS	SWT has expressedSuffolk Wildlife Trust raised concerns regarding the impactpotential impacts on Thrandeston Marsh of proposed undergrounding of existing 132 kV overhead line through the County Wildlife Site. arising from the proposed undergrounding of the existing 132 kV overhead line. National Grid has assessed potential effects through the Environmental Statement and confirmed that impacts on the CWS would be localised, temporary and reversible. Where habitats within the CWS are temporarily affected, they will be reinstated to the baseline habitat type and condition following completion of works, with monitoring and adaptive management secured through the Outline Landscape and Ecological Management Plan. Detailed design will incorporate micro-siting Comments provided as part of the Relevant Representation submitted in November 2025: • Onsite habitats aim should be to improve habitat value and condition, with a restoration to previous condition the minimum required (as it put forward within the Environmental Statement). Regular monitoring should be undertaken to ensure that habitat restoration is on track, with the potential for additional intervention or changes to prescribed management on the table if required. • Where impacts to CWS are unavoidable, care in 'micro-siting' of cable	The 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] sets on the principle that all habitats temporarily affected, including those located within a CWS, will be returned to the baseline habitat type and condition on completion of works.	Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. Biodiversity Net Gain Report [APP-299] Outline Landscape and Ecological Management Plan [AS-046] Outline Code of Construction Practice [APP-300]N/A

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		route to prevent impacts to the mostto avoid ecologically important habitat is needed together with well-designed and executed habitat restoration works; these should aim to deliver habitats to the same or better condition. To compensate for any loss, be it considered temporary or not, measures should seek to enhance the wider CWS for its designated features and other nature conservation priorities as appropriatefeatures where practicable, and construction activities are controlled through the Outline Code of Construction Practice. On this basis, Suffolk Wildlife Trust agrees that impacts on Thrandeston Marsh County Wildlife Site are appropriately assessed and mitigated, with no long-term residual effects anticipated, and this matter is resolved in principle. To re-instate grassland habitat, where necessary, Suffolk Wildlife Trust would like to see a commitment to using green hay in preference to seeding included in the Outline Landscape and Ecological Management Plan.	Habitat enhancement measures to improve the habitat condition for certain habitat types within the Order Limits, have been identified where achievable as set out within the **7.1 Biodiversity Net Gain Report [APP-299]).** Section 11.4 of the **7.4 Outline Landscape and Ecological Management Plan [AS-046]** prescribes	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			regular monitoring over a five-year period for designated sites which would include Sproughton Park CWS, Fore and Bushey Groves CWS and Thrandeston Marsh CWS. This section of the Outline Landscape and Ecological Management Plan [AS-046] also includes adaptive measures to ensure habitats are returned to their target type and condition.	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			National Grid is committed to avoiding and minimising impacts to important ecological features, including CWSs, wherever practicable. The detailed design stage would include micro-siting to ensure avoidance of key areas of ecological value where practicable in line with commitments made within the **7.2 Outline Code of**	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			Construction Practice [APP-300]. Habitats would be returned to existing baseline value and condition, unless identified within the 7.1 Biodiversity Net Gain Report [APP-299]), with additional enhancement measures proposed. Details will be included within a final Landscape and Ecological Management Plan.01/05/2026	

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ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
6.10 6.12	Air Quality	Comments provided in response to the Statutory Consultation in July 2024: • At receptor ER_17, there is an increase in nitrogen deposition, with the impact being less than 1% of the relevant lower critical load and therefore considered to be not significant. The Trust urge caution in this assessment and seek clarity that in-combination impacts from any other projects assessed as being impacts.Suffolk Wildlife Trust raised comments regarding potential changes in nitrogen deposition at receptor ER_17 (Birch Wood) and the need to consider cumulative and in-combination effects. National Grid has assessed construction dust and traffic emissions within the Environmental Statement, which confirms that the predicted increase in nitrogen deposition at ER_17 is less than 1% of the relevant lower critical load and not significant, with cumulative and in-combination effects also assessed as negligible during construction and operation. On this basis, potential air quality effects are considered to have been appropriately assessed and addressed through the Environmental Statement, with no significant residual effects anticipated and no further action required.	A construction dust assessment and an assessment of construction traffic emissions is presented in the ES to determine any changes in air quality arising from construction phase. The ES also recommends good practice to mitigate the impact of the Project on air quality. The ES clarifies the approach to assessing in combination /	**Environmental Statement Chapter 7: Air Quality [APP-147]** **Environmental Statement Chapter 17: Cumulative Effects [APP-281]**N/A

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			cumulative effects and the cumulative assessment concludes that the inter-project assessment for air quality would have negligible and not significant inter-project effects on air quality receptors within the areas surrounding the Project, during both construction and operation (and maintenance).01/05/2026	
6.11 6.13	Hydrology	Comments provided as part of the Relevant Representation submitted in November 2025:	Following completion of	**Outline Code of Construction**

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		• Any proposals to underground existing 132kV OHLs must adequately assess and mitigate the risk of groundwater and surface water pollution, and any potentially adverse hydrological effects on the River Waveney and sensitive wetland habitats, including designated wildlife sites such as Roydon Fen.Suffolk Wildlife Trust raised concerns regarding potential hydrological effects associated with undergrounding of the existing 132 kV overhead lines, including effects on groundwater, surface water and sensitive receptors such as the River Waveney and Roydon Fen. National Grid has confirmed that potential hydrological effects have been assessed within the Environmental Statement and that any dewatering required would be subject to a site-specific Hydrogeological Risk Assessment in accordance with commitment GH11 within the Outline Code of Construction Practice, with any additional mitigation agreed with the Environment Agency where necessary. On this basis, potential hydrological effects within Suffolk are considered to be appropriately managed through secured DCO commitments, with no long-term adverse hydrological effects anticipated.	ground investigation to inform the detailed design of the undergroundin g works, if dewatering is anticipated for any locations within open cut trenches, a Hydrogeologica l Risk Assessment would be undertaken, in accordance with commitment GH11 within the **Outline Code of Construction Practice [APP-300]**. The	**Practice [APP-300]**N/A

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			assessment would consider the specific risks to groundwater and water environment receptors at those locations and identify any additional mitigation that may be required, the nature and scope of which will be agreed with the Environment Agency or other stakeholders, as appropriate.01/05/2026	
6.12 6.14	Mitigation Hierarchy	Comments provided in response to the Statutory Consultation in July 2024:	• The mitigation	**Environmental Statement**

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		• The Trust re-iterate BMSDC comments and seek reassurance that the mitigation hierarchy will be rigorously applied to avoid impacts before the consideration of mitigation and compensation. Comments provided as part of the Relevant Representations submitted in November 2025: • Suffolk Wildlife Trust continue to seek assurances that a strict adherence to the Mitigation Hierarchy will be followed, including evidence that impacts are being avoided and enhancement is being delivered. Where mitigation, compensation, and enhancement are delivered – be it for Biodiversity Net Gain, landscape, or for targeted species – we seek to ensure the best possible outcomes for biodiversity.Suffolk Wildlife Trust sought reassurance that the mitigation hierarchy has been rigorously applied and clearly evidenced through scheme design and assessment. National Grid has confirmed that the mitigation hierarchy, as set out in the Planning Statement, has been applied throughout the routing, siting and design process, with avoidance prioritised where practicable and proportionate minimisation applied where avoidance was not possible. Updated ecological surveys covering approximately 97% of the Order Limits were submitted in November 2025, with no material change to the conclusions of the Environmental Statement. Mitigation, compensation and enhancement are secured through the Outline LEMP and Outline CoCP, supported by the scheme BNG approach. On this basis, the application of the mitigation hierarchy is considered to be appropriately demonstrated and secured, and this matter is treated as agreed in principle.	hierarchy, as detailed in Section 7 of 5.6 Planning Statement [APP-085], has been applied throughout the routeing, siting and design process, with avoidance of impacts on biodiversity receptors prioritised wherever practicable and minimisation measures	Chapter 8: Ecology and Biodiversity (document reference 6.8) – Section 8.6 Planning Statement [APP_085]N/A

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			incorporated where complete avoidance is not possible. 7.4 Outline Landscape and Ecological Management Plan [AS-046] and 7.2 Outline Code of Construction Practice [APP-300] secure commitments to mitigation, compensation and enhancement, including	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			measures for targeted species and habitats and landscape planting. 7.1 Biodiversity Net Gain Report [APP-299] sets out the approach to delivering Biodiversity Net Gain, which includes habitat creation, enhancement and long-term management to ensure measurable benefits for biodiversity.	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			• The Main Works Contractor will be required to adhere to all commitments within 7.4 Outline Landscape and Ecological Management Plan (LEMP) [AS-046] and 7.2 Outline Code of Construction Practice (CoCP) [APP-300], ensuring that the mitigation hierarchy is implemented and that the best possible outcomes for biodiversity are	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			achieved when developing the final LEMP and CoCP.01/05/2026	
6.13 6.15	Hedgerow Loss	Concern regarding direct habitat loss and temporary loss of connectivity. Impacts to farmland birds (loss of foraging and nesting habitat), hazel dormice (loss of habitat), and bats (esp. barbastelle) (loss of connecting habitat). Additionally, we note that defining this loss of connectivity as temporary fails to consider that the typical time for re-establishment is 4-5 years, the average lifespan of a hazel dormice. The time taken for a replanted hedgerow to achieve equivalent ecological value to a removed ancient or long-existing hedgerow could be significantly longer than this. Comments provided as part of the Relevant Representations submitted in November 2025: • Where dormice habitat, notably hedgerow habitat, is removed as part of works (notably for the undergrounded section through Dedham Vale National Landscape), any required mitigation to retain connectivity for dormice should be monitored to assess its effectiveness. We believe this should be strengthened by including monitoring to assess presence/ absence in the wider landscape (offering clarity if monitoring shows a lack of use of mitigation). • SWT are interested in the proposed mitigation measures to retain hedgerow connectivity for bats. Previous research on mitigation measures in Suffolk has been undertaken as part of infrastructure works, this has been	National Grid will continue to engage with Suffolk Wildlife Trust on this issue. • The artificial bat flyways are proposed at key locations where the survey data have indicated a high usage feature by foraging/commuting bats, to	**Outline Landscape and Ecological Management Plan [AS-046]** **Outline Landscape and Ecological Management Plan [AS-046]**N/A

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		shared with National Grid by SWT; this research highlights the need for more data and Norwich to Tilbury provides a highly suitable opportunity to provide this, adding insight into the effectiveness of mitigation measures aiming to provide temporary connectivity across hedgerows during and immediately after proposed works. Suffolk Wildlife Trust raised concerns regarding hedgerow loss, habitat connectivity and potential effects on protected species. National Grid has confirmed that hedgerow impacts have been minimised through routeing, siting and design, with mitigation, enhancement and management measures secured through the Outline Landscape and Ecological Management Plan, including targeted hedgerow planting using locally appropriate native species. Measures to maintain connectivity during construction, including temporary artificial bat flyways, are also secured. On this basis, hedgerow loss and connectivity effects within Suffolk are considered to be appropriately mitigated and managed through secured DCO commitments, with any remaining discussions focused on detailed implementation rather than the principle of approach.	ensure connectivity is maintained during construction. The approach to bat commuting/foraging mitigation and the proposed locations for the bat flyways, has been agreed with the Local Planning Authorities (LPA) through consultation on **7.4 Outline**	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			Landscape and Ecological Management Plan [AS-046] as outlined within the relevant LPA Statements of Common Ground submitted at Deadline 1 [APP-089 to APP-100]. The structures proposed are effectively temporary artificial replacements of the sections of	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			hedgerows removed and are not the same, or do not have the same purpose as the permanent bat bridges used for the A11. These artificial flyways have been used successfully on other DCO projects for relatively short sections of temporary impact. National	

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ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			Grid welcomes further discussions on the design of the proposed temporary bat flyways at the detailed design stage, beyond the principles outlined within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. • There is currently no	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			requirement to monitor the bat flyways during construction as part of this Project. • A draft dormouse licence has been prepared and issued to Natural England for review. National Grid is working with Natural England to agree upon necessary dormouse mitigation and expect to receive a Letter of No	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			Impediment during the examination phase. Due to the small scale of impact on any of the dormouse sites, it is not expected that this would include the requirement for any ongoing dormouse monitoring, however this will be agreed with Natural England as part of the draft licence process.01/05/2026	
6.14 6.16	Dedham Vale National Landscape	An important area for wildlife including hazel dormice and bats. The proposed change from Overhead Line (OHL) to underground occurs near to Raydon Great Wood and a linear belt of habitat both of which are suitable	• No positive dormouse sites were	N/A

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		habitat for dormice. The use of trenching and Horizontal Directional Drilling (HDD) in Dedham Vale National Landscape will see increased hedgerow losses – issue covered above. Comments provided as part of the Relevant Representations submitted in November 2025: • Where dormice habitat, notably hedgerow habitat, is removed as part of works (notably for the undergrounded section through Dedham Vale National Landscape), any required mitigation to retain connectivity for dormice should be monitored to assess its effectiveness. We believe this should be strengthened by including monitoring to assess presence/ absence in the wider landscape (offering clarity if monitoring shows a lack of use of mitigation)Suffolk Wildlife Trust raised concerns regarding potential impacts on wildlife within the Dedham Vale National Landscape, including effects on hazel dormouse and hedgerows associated with undergrounding works. National Grid has confirmed that no positive dormouse sites were identified within areas of proposed undergrounding, with all confirmed dormouse records located within areas of proposed 400 kV overhead line where hedgerow impacts are minimal, and a Letter of No Impediment has been issued by Natural England confirming the acceptability of the mitigation. On this basis, impacts within the Dedham Vale National Landscape are considered to have been appropriately assessed and managed through the statutory licensing framework and secured DCO commitments, with no significant residual effects anticipated.	identified through surveys, within any of the areas of proposed undergrounding. All positive dormouse sites were in areas of proposed 400 kV overhead line and therefore hedgerow impact is minimal. • A draft dormouse licence has been prepared and issued to Natural England for	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			review. National Grid is working with Natural England to agree upon necessary dormouse mitigation and expect to receive a Letter of No Impediment during the examination phase. Due to the small scale of impact on any of the dormouse sites, it is not expected that this would include the requirement for any ongoing dormouse	

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			monitoring, however this will be agreed with Natural England as part of the draft licence process.01/05/2026	

7. Matters Currently Under Discussion

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
7.1	WalOR Project	**Formalisation of WaLOR project liaison and detailed design interfaces** Notwithstanding agreement in principle on project compatibility, Suffolk Wildlife Trust has requested that more specific and enforceable provisions are included to govern how detailed design will be progressed in consultation with the WaLOR Project team. This request was discussed at the meeting held on 1 May 2026. In particular, Suffolk Wildlife Trust seeks assurance that the Main Works Contractor,	National Grid is committed to ongoing collaboration with the WaLOR project team, and the Main Works Contractor(s) would seek to engage with the WaLOR project team during detailed design development, to reduce any potential for conflicts between the two projects.	**7.4 Outline Landscape and Ecological Management Plan [REP3-030]**

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		including UK Power Networks, will discuss relevant detailed design parameters with the WaLOR Project team to ensure that construction and operational elements of the Norwich to Tilbury Project do not constrain delivery of WaLOR objectives, including river restoration, floodplain processes and long-term habitat creation. The form, scope and enforceability of this detailed design engagement remain subject to further discussion under item 6.1.		
7.2	WalOR Project	**Bird diverters South of RG88** Notwithstanding the comments relating to Issue 6.1 in Table 6, Suffolk Wildlife Trust has requested that bird diverters are also installed on the overhead line south of Pylon RG88 between the pylon and Ling Road. This location-specific request has not yet been agreed and remains subject to further discussion.	• The current positioning of bird diverters has been informed by the project-specific bird collision risk assessment and an understanding of likely bird flight behaviour in the vicinity of Pylon RG88. The pylon itself represents a prominent and highly visible structure within the landscape, and immediately to the south is an area of established woodland that will be retained, which is expected to limit regular flight activity across the overhead line in this location. • In contrast, the area to the north of Pylon RG88 is more open and is considered to provide a more likely flight pathway	**7.4 Outline Landscape and Ecological Management Plan [REP3-030]**

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
			for birds moving through the area. On this basis, bird diverters are proposed to the north of the pylon, where they are anticipated to be most effective in reducing collision risk. • Notwithstanding this position, National Grid acknowledges the request from Suffolk Wildlife Trust for bird diverters to also be installed on the overhead line south of RG88 between the pylon and Ling Road. This location-specific request has not yet been agreed and remains subject to further discussion during detailed design, including ongoing engagement with Suffolk Wildlife Trust and consideration of any additional information relevant to bird activity and collision risk.	
7.3	County Wildlife Sites (CWSs) in Suffolk	Notwithstanding agreement in principle (6.2 in Table 6), Suffolk Wildlife Trust has requested that the Outline Landscape and Ecological Management Plan includes wording to state a preference, where practicable, for the use of green hay from local sources to protect local seed banks and support the reinstatement of habitats in County Wildlife Sites. This request relates to detailed wording within the Outline	• National Grid notes that this request relates to detailed wording within the Outline Landscape and Ecological Management Plan, rather than the principle or acceptability of the agreed mitigation approach. The proposed wording change, relating to a preference (where practicable) for the use of green hay from local sources, is currently under consideration and will be reviewed as part of the next update to	**7.4 Outline Landscape and Ecological Management Plan [REP3-030]**

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
		LEMP rather than the acceptability of the mitigation approach.	the Outline LEMP.	

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8. ~~7.~~ Signatures

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

For National Grid

Name: _____

Position: _____

Date: _____

For Suffolk Wildlife Trust

Name: _____

Position: _____

Date: _____

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Changes:	
Add	109
~~Delete~~	229
~~Move From~~	0
Move To	0
Table Insert	4
~~Table Delete~~	1
Table moves to	0
~~Table moves from~~	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	343