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# Norwich to Tilbury

## Volume 5: Reports and Statements

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Wildlife Trust - Clean Version

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**nationalgrid**

# Revision History

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

# Essex Wildlife Trust

## Draft Statement of Common Ground

### 1. Purpose of the Statement of Common Ground

This Statement of Common Ground (SoCG) has been prepared to outline the areas of agreement and any remaining points of discussion between National Grid and Essex Wildlife Trust 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 SoCG is agreed between National Grid and the Essex Wildlife Trust (EWT).

### 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 - General	<p>EWT raised in July 2024 concerns in regard to:</p> <ul style="list-style-type: none"><li>• Loss and damage to habitats, hedgerows and trees, including ancient woodland</li><li>• Long-term ecological harm despite being described as "temporary"</li><li>• Impacts on protected species (dormice, bats, birds)</li><li>• Fragmentation of ecological connectivity from underground cabling</li><li>• Cumulative environmental losses, particularly around Tilbury</li></ul> <p>The Applicant has summarised how the Project has sought to reduce impacts on wildlife sites, how impacts to trees have been considered, and references the appropriate mitigation set out in the Outline LEMP.</p>	Likely to be resolved by Deadline 7 following further engagement.

SoCG ID	Summary of matter under discussion	Deadline for resolution
	<p>The Applicant has summarised the draft license applications that have been issued to Natural England and the Letters of No Impediment (LONI) for water vole, badger and dormouse received. A signed Impact Assessment and Conservation Payment Certificate for Great Crested Newts (GCN) has also been obtained. The Applicant is still working closely with Natural England to prepare a Draft project-wide licence for bats. EWT are to review the information provided and respond with any further comments on discussions.</p>	
<p>7.2 – Ancient Woodlands and irreplaceable habitat</p>	<p>EWT raises concerns in regards to six ancient woodland sites within the Order Limits, 34 ancient woodland sites within the 15m root protection zone buffer, and four veteran trees requiring removal. The Applicant refers to the Outline LEMP where details of potential impacts and site-specific mitigation or compensation measures are set out. EWT to review this document and further discussions will take place on this matter.</p>	<p>Likely to be resolved by Deadline 7 following further engagement.</p>
<p>7.3 – Local Wildlife Sites in Essex</p>	<p>EWT and the Applicant agree that impacts on LoWSs have been minimised, but appropriate mitigation remains under discussion.</p>	<p>Likely to be resolved by Deadline 7 following further engagement.</p>
<p>7.4 – Licensable Species and Designated Sites</p>	<p><b>Protected Species</b></p> <p>Dormouse - EWT maintains that the Project would result in unacceptable habitat fragmentation of Hazel Dormouse populations during the multi-year construction period. In March 2026, the Applicant received a Letter of No Impediment (LONI) confirming that ‘Natural England sees no impediment to licences to derogate for impacts to dormouse being issued’.</p> <p>Bats - EWT considers that the proposed bat flyway crossing structures are insufficient in number and effectiveness to address habitat severance. The Applicant confirms the mitigation proposed, including bat flyways for commuting / foraging bats. The design of the temporary bat flyways will be confirmed at the detailed design stage.</p>	<p>Likely to be resolved by Deadline 7 following further engagement.</p>

SoCG ID	Summary of matter under discussion	Deadline for resolution
	<p>Otter - EWT considers that the Project may result in unacceptable impacts on an otter natal holt, including potential displacement during the breeding season. The Applicant has confirmed that further surveys for 2025 have been conducted and the results published in November 2025, and there is no displacement concern for kits at otter natal holts as part of this Project.</p> <p>Water Vole - EWT considers Water Vole survey coverage to be incomplete and the proposed displacement methodology to be unclear. The Applicant has confirmed that further surveys for 2025 have been conducted and the results published in November 2025. The Applicant has received a LONI confirming that 'Natural England sees no impediment to licences to derogate for impacts to water vole being issued'.</p> <p><b>Designated Sites</b></p> <p>Functionally Linked Land - EWT concerns include the adequacy of the HRA regarding FLL. The Applicant confirms FLL was assessed using vantage point and transect survey data, habitat suitability mapping and species-specific behavioural information. The HRA concludes that the Project will result in no adverse effect on the integrity of any European Site, with mitigation secured through embedded design measures and construction controls. Natural England has confirmed agreement with the HRA approach and conclusions.</p> <p>Bird Disturbance – EWT are concerned about disturbance to bird populations during construction. The HRA assesses potential disturbance effects on relevant European Sites and associated FLL. Natural England agreed that, given the temporary nature of works within FLL associated with the Stour and Orwell Estuaries SPA/Ramsar, sufficient alternative habitat is available within the wider landscape to support affected species, including lapwing and golden plover. The HRA concludes that disturbance effects would result in no adverse effect on the integrity of the Stour and Orwell</p>	

<b>SoCG ID</b>	<b>Summary of matter under discussion</b>	<b>Deadline for resolution</b>
	<p>Estuaries SPA/Ramsar or any other European Site.</p> <p>Collision Risk – Collision risk has been assessed using vantage point surveys, species-specific flight behaviour and established modelling. Embedded mitigation includes undergrounding cables through the Dedham Vale National Landscape. Bird diverters are proposed on a precautionary basis at the River Waveney and Ardleigh Reservoir, where higher-risk species occur. Elsewhere, survey data showed low collision risk. The HRA concludes no adverse effect on the integrity of any European Site.</p> <p>Impacts of SSSIs and LoWSs – The Applicant confirms that through routeing and siting, direct impacts on designated sites have been avoided and indirect effects have been minimised through embedded mitigation, as well as mitigation set out in the Outline LEMP and Outline CoCP.</p> <p>Further discussions are proposed to discuss bat flyway locations, hazel dormice habitat fragmentation, and collision risk modelling for wintering birds.</p>	
7.5 – BNG Offsite Solutions	<p>Discussions are ongoing between EWT and the Applicant on offsite BNG units for the Project. Further engagement is currently taking place on a framework agreement.</p>	Likely to be resolved by Deadline 7 following further engagement.
7.6 – Biodiversity Net Gain	<p>EWT considers the proposed 10% BNG commitment insufficient, and is seeking 20% BNG. EWT retains concerns regarding BNG methodology, habitat creation proposals, and alignment with the Essex Local Nature Recovery Strategy.</p> <p>The Applicant has committed to deliver 10% BNG with wider environmental and societal benefits for the Project.</p>	Likely to be resolved by Deadline 7 following further engagement.
7.7 – Nature Recovery Network	<p>EWT request that opportunities are explored for river restoration or enhancements, and improve habitats quality and connectivity with national nature recovery projects. The Applicant confirmed opportunities are set out in the WFD</p>	Likely to be resolved by Deadline 7 following further engagement.

SoCG ID	Summary of matter under discussion	Deadline for resolution
	assessment, and aquatic species mitigation is set out in the Outline LEMP.	
7.8 – Abbots Hall	Conversations are ongoing between EWT and the Applicant on opportunities for BNG at Abbots Hall.	Likely to be resolved by Deadline 7 following further engagement.
7.9 – Cumulative Effects	EWT note that the ES states that “ <i>The inter-project effects for ecology and biodiversity receptors during construction and operation were assessed as negligible and not significant</i> ” but do not believe this fully considers the burden on Essex’s biodiversity as a result of multiple major infrastructure projects. The Applicant confirms this conclusion of the cumulative effects assessment and Habitats Regulations Assessment. Further discussions are to take place before this matter can be agreed.	Likely to be resolved by Deadline 7 following further engagement.
7.10 – Survey Deficiencies	The Applicant submitted the further ecology survey results in November 2025. EWT to review these documents and confirm if they have any further comments in this regard.	Likely to be resolved by Deadline 7 following further engagement.
7.11 – Legislation and Policy Compliance	EWT note that they may comment on whether the scheme as currently proposed complies with The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations), the NERC Act 2006 Section 40, the Environment Act 2021, the NPPF (December 2024) paragraphs 185, 186, and 187, and National Policy Statement EN-1. EWT to confirm if they have any comments to this regard.	Likely to be resolved by Deadline 7 following further engagement.

## 4. Background

### 4.1 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 (AONB))
- 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 consultations and one statutory consultation to inform its proposals, with further recent targeted consultations.

## **5. Stakeholder Interests**

EWT supports the transition to renewable energy to mitigate the worst impacts of climate change. There is an understanding that additional electricity transmission infrastructure is needed to facilitate the shift towards a decarbonised energy sector; however, it is essential that this shift is not at the expense of wildlife and biodiversity, which faces an intrinsically linked and equally serious crisis. EWT therefore support a coordinated strategic approach to the planning, design and construction of new energy infrastructure to reduce the overall negative impacts from schemes on nature and maximise potential for habitat creation and restoration to deliver environment, social and economic benefits.

EWT would like more detail from National Grid regarding how impacts will be mitigated through design and during the construction and operational phases, as well as information about potential limitations the scheme might place on habitat restoration and management activities in the vicinity of the overhead lines and pylons. Given the nature of the impacts, EWT also expect to see evidence that the mitigation hierarchy has been followed and measures to avoid ecological impacts have been considered

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.

EWT'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 Local Wildlife Sites
- Bird collision risk modelling
- Potentially significant impacts at a population level on hazel dormice in Dedham Vale National Landscape (echoing the concerns of Suffolk Wildlife Trust on this matter).
- Concerns include significant habitat loss, including the removal of a considerable number of trees, at Springfield Farm, north of Black Brook in Section C
- Habitat losses impacting a number of non-statutory Local Wildlife Sites (LoWS) in Essex including areas of ancient woodland
- Impacts on hazel dormice, bats and birds

EWT 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.

The chronology of National Grid's engagement with EWT 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 \(April 2022\) \[APP-356\]](#)
  - 21 April – 16 June non-statutory consultation
- 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 consultation on the 2023 Preferred Draft Alignment
  - 9 August 2023 – Meeting to discuss BNG opportunities
- 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
  - 26 July 2024 – Received statutory consultation response from EWT
  - 10 October 2024 – Meeting to discuss BNG opportunities
- 2025
  - Development of the proposed Project Alignment prior to DCO submission, considering feedback and further engineering and environmental studies
  - 30 January – 17 April Targeted Consultations on proposed changes to the 2024 Preferred Draft Alignment
  - 24 April 2025 – Meeting to discuss BNG and tree planting opportunities
  - 19 June 2025 – Meeting to discuss BNG and tree planting opportunities
  - 14 July 2025- Meeting to discuss the SoCG with Essex Wildlife Trust, Suffolk Wildlife Trust and Norfolk Wildlife Trust.
  - 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

- 3 December 2025 – Meeting to discuss BNG and offsite opportunities
- 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 with Essex Wildlife Trust and Environment Agency to discuss the WaLOR project.
- 23 April 2026 – Updated draft of SOCG shared with EWT for review and feedback

## 6. Matters Agreed

ID	Issue	Agreement reached	Date agreed	Relevant documentation
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## 7. Matters Currently Under Discussion

ID	Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
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7.1	General	<p>Comments provided in response to the Statutory Consultation in July 2024: The Trust has identified the following concerns and issues to address:</p> <ul style="list-style-type: none"> <li>Impacts of undergrounding cables where route passes through Dedham Vale National Landscape – impact on hedgerows and time lag between replacing hedgerows and achieving connectivity and equal ecological value.</li> <li>Significant habitat loss, including the removal of a considerable number of trees, at Springfield Farm, north of Black Brook in Section C</li> </ul>	<p>Through the consideration of consultation feedback such as that provided by EWT and ongoing environmental and engineering studies, the Project has minimised impacts on wildlife sites where possible and have detailed appropriate mitigation to ensure no long-term residual effects.</p> <p>Impacts to trees has been considered by the design team and a full impact assessment for biodiversity receptors is included within the Environmental Statement.</p> <p>Mitigation for impacts on wildlife sites can be found in <i>Section 9 Landscape and Ecological Reinstatement and Mitigation</i> of <b>7.4 Outline</b></p>	<p><b>7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]</b></p> <p><b>6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA)</b></p>
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ID	Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
		<ul style="list-style-type: none"> <li>Habitat losses impacting a number of non-statutory LoWS in Essex, including areas of ancient woodland</li> <li>Impacts on hazel dormice, bats and birds- both with overhead collisions and undergrounding impact on hedgerows</li> <li>Impact on Tilbury -impact on Tilbury from other developments and the cumulative net loss.</li> <li>The scheme will cause significant temporary losses of lowland mixed deciduous woodland, coastal and floodplain grazing marsh, lowland dry acid grassland, important hedgerows, and rivers. While termed 'temporary', these losses will persist for several years, and full ecological restoration will take decades.</li> </ul>	<p><b>Landscape Ecological Management Plan [REP3-030].</b></p> <p>Impacts and mitigation for protected species can be found in Section 6.1 Protected Species Mitigation of <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b>. Where necessary, draft licence applications have issued to Natural England. In March 2026, the applicant received Letters of No Impediment (LONI) for water vole, badger and dormouse confirming that 'Natural England sees no impediment to licences to derogate for impacts to badgers, dormouse and water vole being issued'. A signed Impact Assessment and Conservation Payment Certificate for Great Crested Newts (GCN) has also been obtained from Natural England and signed by the Applicant. This confirms that the Applicant will apply for a GCN District Level Licensing (DLL) post consent and that Natural England agree to deliver the necessary mitigation. No bat roosts identified which will be impacted by the project and therefore Natural England are unable to provide a LONI for bats. The Applicant is still working closely with Natural England to prepare a Draft project-wide</p>	<p><b>Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065]</b></p> <p><b>6.17 Environment Statement Chapter 17 Cumulative Effects [APP-281]</b></p> <p><b>7.2 Outline Code of Construction Practice [REP3-025]</b></p>

ID	Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
			<p>licence for bats. A letter of support is expected to be issued by Natural England supporting the contents of the draft Project-wide licence during the Examination.</p> <p>Impacts from other developments and cumulative net loss can be found in <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b>.</p> <p>There are several commitments within <b>7.2 Outline Code of Construction Practice [REP3-025]</b> to minimise vegetation loss and to retain habitat connectivity where practicable.</p>	
7.2	Ancient Woodlands and irreplaceable habitats	<p>Essex Wildlife Trust highlighted in their relevant representations dated 11 November 2025 the following comments:</p> <ul style="list-style-type: none"> <li>Ancient woodlands are irreplaceable habitats. The scheme identifies six ancient woodland sites (1.7 ha) within the Order Limits and 34 ancient woodland sites within the 15m root protection zone buffer. Additionally, 112 veteran trees have been surveyed with four requiring removal. Our concerns include, but are not limited to:</li> </ul>	<p>National Grid provides the following response to EWT’s comments raised in their Relevant Representation regarding ancient woodlands and veteran trees</p> <ul style="list-style-type: none"> <li>Although unavoidable the impacts to the ancient woodlands within Essex are minimal and appropriate mitigation has been provided to ensure no long term impacts. A full breakdown of the impacts to each ancient woodland and a site specific mitigation/compensation solution has been provided within <b>7.4 Outline Landscape and Ecological</b></li> </ul>	<p><b>7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]</b></p> <p><b>6.13.A6 Environmental Statement Appendix 13.6 -</b></p>

ID	Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
		<ul style="list-style-type: none"> <li>— Four ancient woodlands in Essex where impacts are confirmed as unavoidable: Rivenhall Thicks (Section E); Writtle-Writtlepark Wood (Section F); Little Bladen’s Wood (Section G); and Clapgate Wood (Section G). Rainbow Wood and Ashen Shaw (Section H/G) - no direct impacts from this project, but affects LTC mitigation planting area</li> <li>— The four irreplaceable ancient trees, currently flagged as requiring removal, for which we would expect avoidance proposals. The Ancient Woodland and Veteran Tree Strategy states that “full compensation is unachievable”</li> <li>— reliance on the 15m buffer as the sole protective measure when Natural England’s standing advice, currently under review, states this is a minimum for exclusion of activity that may be insufficient depending on site-specific factors</li> </ul>	<p><b>Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032].</b></p> <ul style="list-style-type: none"> <li>• <b>6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065]</b> provides a reasonable worst-case assessment of tree impacts. During and following detailed design, the Main Works Contractor(s) would seek to reduce impacts and avoid trees where practicable.</li> <li>• Compensation for any loss of irreplaceable habitat would be agreed with stakeholders as outlined in <b>7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032].</b></li> <li>• Commitments within <b>7.2 Outline Code of Construction Practice [REP3-025].</b></li> <li>• Application of a 15 m buffer from ancient woodland is currently the standing advice available and is considered appropriate</li> </ul>	<p><b>Arboricultural Impact Assessment (AIA) Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065]7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]</b></p> <p><b>7.2 Outline Code of Construction Practice [REP3-025]</b></p>

ID	Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
		<ul style="list-style-type: none"> <li>– access rights across ancient woodlands causing soil compaction and root damage</li> <li>– adequacy of the compensatory planting strategy</li> </ul>	<p>for the temporary works associated with this Project.</p> <ul style="list-style-type: none"> <li>• Right of access routes would only be used during the maintenance period and any use would be generally limited to a small vehicle with limited movements. This potential impact is identified, where relevant to individual ancient woodlands, within <b>7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [REP3-032]</b> and appropriate mitigation measures are set out within the document. These measures will ensure no significant residual effect on ancient woodlands are encountered as a result of right of access routes.</li> </ul>	
7.3	Local Wildlife Sites (LoWS) in Essex	<p>EWT agree that the Norwich to Tilbury Project has minimised impacts on the majority of LoWS in Essex. Appropriate mitigation for impacts on some LoWS remains a matter for discussion</p> <p>Essex Wildlife Trust confirmed that this matter was still under discussion in a</p>	<p>The Project has minimised impacts on LoWS in Essex where possible and have detailed appropriate mitigation to ensure no long-term residual effects.</p>	N/A

ID	Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
		meeting to discuss the Statement of Common Ground on 9 <sup>th</sup> December 2025.		
7.4	Licensable Species and Designated Sites	<p>EWT has considerable in-house expertise in respect of protected (licensable) species and routinely provides comments to planning authorities and the Planning Inspectorate on protected species matters. EWT also routinely provide comments on matters relating to statutory designated sites, as per their charitable remit. EWT therefore reserve the right to provide comments on the Norwich to Tilbury Project in respect of protected (licensable) species and statutory designated sites</p> <p>Essex Wildlife Trust highlighted in their Relevant Representation dated 11 November 2025 the following comments on protected species:</p> <ul style="list-style-type: none"> <li>Three European Protected Species are affected: Hazel Dormouse (confirmed at five Essex locations), bats (extensive activity recorded with incomplete roost surveys) and European Otter (confirmed holts including breeding site); in addition,</li> </ul>	<p>National Grid will continue to engage with EWT on this matter.</p> <p>National Grid provides the following response to Essex Wildlife Trust’s comments raised in their Relevant Representation regarding protected species</p> <ul style="list-style-type: none"> <li>Survey results from 2025 (including otter, water vole and bat roost inspections) are presented within the updated <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> which was submitted to the Planning Inspectorate in November 2025. Conclusions in the assessment have not changed as a result of the 2025 surveys undertaken.</li> <li>National Grid has been working closely with Natural England to prepare a draft dormouse licence. In March 2026, National Grid received a Letter of No Impediment (LONI) confirming that ‘Natural England sees no impediment to licences to derogate for impacts to dormouse being issued’. The habitat loss</li> </ul>	<p><b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b></p> <p><b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b></p> <p><b>6.8.A13 ES Appendix 8.13: Otter and Water Vole Report [AS-039]</b></p> <p><b>5.3 Habitats Regulations Assessment Report [APP-082]</b></p> <p><b>7.2 Outline Code of Construction Practice [REP3-025]</b></p>

ID	Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
		<p>Water Voles (fully protected under Schedule 5 (Section 9) of the Wildlife and Countryside Act 1981 [as amended]) have been confirmed in multiple sections (with 72 watercourses not surveyed). Their concerns include, but are not limited to:</p> <ul style="list-style-type: none"> <li>– habitat fragmentation during multi-year construction isolating Hazel Dormouse populations</li> <li>– bat flyway crossing structures proposed at limited locations may be insufficient for extent of habitat severance and efficacy of any such structures, given clear evidence demonstrating highway crossing structures do not work (e.g. A11)</li> <li>– impacts on Otter natal holt with kits requiring displacement during breeding season</li> <li>– incomplete Water Vole surveys and unclear displacement methodology</li> </ul>	<p>in and around the confirmed dormouse sites is minimal with design and routing carefully undertaken to avoid and minimise impacts. There would be no significant connectivity loss for hazel dormouse during the construction period at any of the confirmed dormouse sites. Impacts to suitable dormouse habitat is limited to temporary gaps in hedgerows and woodland habitats, to facilitate the construction haul roads. The size of the gap would be a maximum of 12 m wide and therefore would not cause fragmentation of dormouse habitat in line with current guidelines. Connected hedgerows around the sites would remain and dormouse would travel more than 12 m across open ground. All dormouse habitats would be reinstated following the completion of the works.</p> <ul style="list-style-type: none"> <li>• The artificial bat flyways are proposed at key locations where the survey data has indicated a high usage feature by foraging/commuting bats, to ensure connectivity is maintained during construction. The approach to bat commuting/foraging mitigation and the</li> </ul>	

ID	Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
		<p>Essex Wildlife Trust highlighted in their Relevant Representation dated 11 November 2025 the following comments on designated nature conservations sites:</p> <ul style="list-style-type: none"> <li>• The scheme affects internationally designated sites within Essex including the Stour and Orwell Estuaries Ramsar/SPA and the Thames Estuary and Marshes Ramsar/SPA, as well as nationally designated SSSIs and Local Wildlife Sites. Our concerns include, but are not limited to: <ul style="list-style-type: none"> <li>– the adequacy of the Habitats Regulations Assessment (HRA), particularly regarding functionally linked land (FLL) for SPA qualifying species</li> <li>– the assessment of collision risk for birds using internationally important sites and the adequacy of collision risk modelling, with bird diverter installation proposed at only two locations (River Waveney and Ardleigh Reservoir) across the 180 km route despite significant</li> </ul> </li> </ul>	<p>proposed locations for the bat flyways, has been agreed with the Local Planning Authorities (LPA) through consultation on <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b>, as outlined within the relevant LPA Statements of Common Ground to be submitted at Deadline 1. The structures proposed are effectively temporary artificial replacements of the sections of hedgerows removed and are not the same/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. The Applicant welcomes further discussions on the design of the proposed temporary bat flyways at the detailed design stage, beyond the principles outlined within <b>7.2 Outline Landscape and Ecological Management Plan [REP3-030]</b>.</p> <ul style="list-style-type: none"> <li>• Further otter surveys were undertaken over 2025, with camera trapping completed at any potential holt/resting site. The 2025 surveys confirmed that</li> </ul>	

ID	Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
		<p>bird activity recorded at multiple vantage points</p> <ul style="list-style-type: none"> <li>– disturbance to bird populations during construction through noise, lighting, and human activity</li> </ul> <p>Essex Wildlife Trust confirmed that this matter was still under discussion in a meeting to discuss the Statement of Common Ground on 9<sup>th</sup> December 2025. Noted that the Bat Flyway locations in relation to habitat loss that evidence from the A11 DCO that the process was shown not to work and further discussion was required. Added that the Trust was still unclear on the habitat fragmentation of Hazel Dormice.</p> <p>Essex Wildlife Trust provided an update on collision risk modelling in the meeting to discuss the Statement of Common Ground on 9<sup>th</sup> December 2025. Noted that the team were currently working through risk modelling and understanding the requirements in wintering bird surveys.</p>	<p>none of the potential locations supported otter. This additional survey data has been included within the updated <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b>. Therefore, there is no displacement concern for kits at otter natal holts as part of this Project.</p> <ul style="list-style-type: none"> <li>• Water vole surveys in 2025 have now been undertaken and the results of the surveys provided within the updated <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> and <b>6.8.A13 ES Appendix 8.13: Otter and Water Vole Report [AS-039]</b>. A draft water vole licence has been prepared which includes detail on the water vole displacement methodology and submitted to Natural England. The Applicant has received a LONI confirming that 'Natural England sees no impediment to licences to derogate for impacts to water vole being issued'.</li> </ul> <p>National Grid provides the following response to Essex Wildlife Trust's comments raised in</p>	

ID	Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
			<p>their Relevant Representation regarding designated nature conservation sites:</p> <p><b><u>Habitats Regulations Assessment and Functionally Linked Land</u></b></p> <p><b>5.3 Habitats Regulations Assessment Report [APP082]</b> provides a comprehensive evaluation of all potential impact pathways between the Project and internationally designated sites, including the Stour and Orwell Estuaries SPA/Ramsar and the Thames Estuary and Marshes SPA/Ramsar. Functionally Linked Land (FLL) was assessed using vantage point and transect survey data, habitat suitability mapping and species-specific behavioural information. Areas with potential connectivity to qualifying avian species were screened into the Appropriate Assessment where relevant. The HRA concludes that the Project will result in no adverse effect on the integrity of any European Site, with mitigation secured through embedded design measures and construction controls. Natural England has confirmed agreement with the HRA approach and conclusions, as set out in the Statement of Common Ground to be submitted at Deadline 1.</p>	

ID	Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
			<p><b><u>Disturbance to Bird Populations During Construction</u></b></p> <p>The HRA assesses potential disturbance effects on relevant European Sites and associated FLL, including noise, lighting and human activity during construction. Embedded mitigation measures include seasonal restrictions, buffer zones, directional lighting and construction management controls secured through <b>7.2 Outline Code of Construction Practice [REP3-025]</b>. Natural England has agreed that, due to the temporary nature of works within FLL associated with the Stour and Orwell Estuaries SPA/Ramsar, sufficient alternative habitat is available within the wider landscape to accommodate species such as lapwing and golden plover. With these measures in place, the HRA concludes that disturbance effects would result in no adverse effect on the integrity of the Stour and Orwell Estuaries SPA/Ramsar or any other European Site.</p> <p><b><u>Collision Risk and Adequacy of Collision Risk Modelling</u></b></p> <p>Collision risk has been assessed using vantage point survey data, species-specific</p>	

ID	Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
			<p>flight behaviour and established modelling methodologies. A key embedded mitigation measure is the undergrounding of cables throughout the Dedham Vale National Landscape, which removes collision risk for birds moving along the Stour corridor to and from the SPA/Ramsar. Bird diverters are proposed on a precautionary basis at the River Waveney, acknowledging that the proposed WaLOR proposals would likely increase the area's value for wintering birds, as well as at Ardleigh Reservoir, where higher risk species are regularly recorded. At other locations, survey data indicated low levels of flight activity at conductor height or limited functional connectivity with designated sites, and diverters were therefore not required. The HRA concludes that, with this evidence led and proportionate approach, collision risk will result in no adverse effect on the integrity of any European Site.</p> <p><b><u>Impacts on SSSIs and Local Wildlife Sites</u></b></p> <p><b>6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [AS-026]</b> presents the assessment of potential impacts on SSSIs and Local Wildlife Sites in accordance with the EIA Regulations.</p>	

ID	Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
			<p>Through careful routeing and siting of the Project, direct impacts on designated sites have been avoided, and indirect effects (such as disturbance, habitat loss or hydrological change) have been minimised through embedded design and construction controls. Following the application of mitigation measures secured through the <b>7.4 Outline Landscape and Ecological Management Plan [R4EP3-030]</b>, and <b>7.2 Outline Code of Construction Practice [REP3-025]</b> the assessment concludes that no significant residual effects on SSSIs or Local Wildlife Sites are predicted.</p>	
7.5	BNG Offsite Solutions	<p>National Grid has been engaging in productive discussions with EWT regarding the provision of offsite Biodiversity Net Gain units for the Project. National Grid are continuing these discussions with EWT regarding securing the offsite units.</p> <p>Essex Wildlife Trust and National Grid confirmed that this matter was still under discussion in a meeting to discuss the Statement of Common Ground on 9<sup>th</sup> December 2025. Further engagement is</p>	<p>National Grid has been engaging in productive discussions with EWT regarding the provision of offsite Biodiversity Net Gain units for the Project. National Grid is continuing these discussions with EWT regarding securing the offsite units.</p> <p>National Grid and Essex Wildlife Trust confirmed that this matter was still under discussion in a meeting to discuss the Statement of Common Ground on 9 December 2025. Further engagement is</p>	N/A

ID	Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
		currently taking place on a framework agreement.	currently taking place on a framework agreement.	
7.6	Biodiversity Net Gain (BNG)	<p>Comments provided in response to the Statutory Consultation in July 2024:</p> <ul style="list-style-type: none"> <li>We acknowledge the BNG proposals already put forward, but wish to emphasise that the scheme, if consented, should aspire to deliver 20% BNG. The Wildlife Trusts consider this as vitally important in order to fully address the nature emergency and actively contribute towards nature’s recovery. We would therefore encourage National Grid to explore all opportunities to achieve this level of net gain as part of the project.</li> </ul> <p>Essex Wildlife Trust highlighted in their Relevant Representation dated 11 November 2025 the following comments:</p> <ul style="list-style-type: none"> <li>The BNG Report predicts an on-site net loss of -8.25% for Area Habitats requiring 1,165.95 off-site units. While Essex Wildlife Trust has engaged actively and expressed willingness in principle to work with National Grid on</li> </ul>	<p>National Grid will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. Offsite BNG will be delivered through collaboration with partners and purchased from commercially registered providers. National Grid has been engaging in productive discussions with Norfolk, Suffolk and Essex Wildlife Trusts regarding the provision of off-site BNG units for the Project.</p> <p>National Grid provides the following response to Essex Wildlife Trust’s comments raised in their Relevant Representations regarding BNG</p> <ul style="list-style-type: none"> <li>The Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG) for development (subject to certain exemptions) however this requirement is not yet in force for nationally significant infrastructure projects. Current indications are that it will apply to development consent applications submitted from May 2026, however this is yet to be confirmed.</li> </ul>	<p><b>7.1 Biodiversity Net Gain Report [APP-299]</b></p>

ID	Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
		<p>off-site BNG delivery, we may wish to comment on BNG methodology and habitat creation proposals, which should follow best practice guidance. The delivery of BNG should be aligned with the Essex Local Nature Recovery Strategy wherever possible. While we acknowledge that the 10% BNG commitment is not mandatory, we retain the view that the 10% BNG commitment does not adequately reflect the magnitude of likely biodiversity losses or our expectation that such a significant national scheme should make a meaningful contribution to nature’s recovery, with clear, measurable enhancements for key species and specific habitats.</p>	<p>Despite submitting the development consent application before it is mandatory, the Applicant has committed to deliver 10 % 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 any guidelines the BNG assessment methodology was set out and agreed with Natural England and Local Planning Authorities. The details of the BNG methodology have been presented within <b>7.1 Biodiversity Net Gain Report [APP-299]</b>. This includes an approach to strategic significance and commits National Grid to consider Local Nature Recovery Strategies (LNRS) where practicable.</p>	
7.7	Nature Recovery Network	<p>Comments provided in response to the Statutory Consultation in July 2024:</p> <ul style="list-style-type: none"> <li>Any habitat creation or restoration included as part of the proposal should maximise its contribution towards the restoration of ecological</li> </ul>	<p>National Grid notes that opportunities for such improvement are detailed within the <b>7.10 Water Framework Directive Assessment [APP-332]</b> and factored in the BNG calculations.</p> <p>National Grid will consider provision of BNG within areas identified in Local Nature</p>	<p><b>7.4 Outline Landscape Ecological Management Plan [REP3-030]</b></p> <p><b>7.10 Water Framework</b></p>

ID	Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
		<p>connectivity and delivery of the emerging Nature Recovery Network.</p> <ul style="list-style-type: none"> <li>The Trust welcome the statement that the project would seek to provide strategic habitat enhancement and creation, aiming to identify and implement opportunities to improve habitat quality and connectivity and align with national nature recovery objectives and projects.</li> <li>Opportunities should be explored for mitigation to include river restoration or enhancements to reprofile/naturalise riverbanks, improve fish passage for migratory species such as European eel and brown trout, and contribute to natural flood risk management through creation of new wetland areas</li> </ul> <p>Essex Wildlife Trust confirmed that this matter was still under discussion in a meeting to discuss the Statement of Common Ground on 9<sup>th</sup> December 2025, with no further comments made.</p>	<p>Recovery Strategy (LNRS) areas where sites are available and are appropriate to project circumstances.</p> <p>Details of species mitigation in relation to aquatic species is covered in the Aquatic species (including fish and aquatic invertebrates) of Section 6.1 in <b>7.4 Outline Landscape and Ecological Management Plan [REP3-030]</b>.</p>	<p><b>Directive Assessment [APP-332]</b></p> <p><b>7.1 Biodiversity Net Gain Report [APP-299]</b></p>

ID	Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
7.8	Abbotts Hall	<p>EWT interest in Abbots Hall as a potential to collaborate with the NtT project. Noted this in an email from 18<sup>th</sup> August 2023:</p> <ul style="list-style-type: none"> <li>Our interest in BNG is to see how this process can become part of the mix to deliver extensive quality habitats on this site in the journey away from Abbots Hall as a commercial arable farm. The drama of a reimagined Abbots Hall will have the ability to attract the UK's media, and subsequently to inspire and educate the people of Essex for generations to come with a spectacular environment that will deliver a permanent and enormous sense of pride across all of Essex.</li> </ul> <p>Essex Wildlife Trust noted that there was potential for more units closer to Thurrock and the potential for part of the BNG to be nearer Abbots Hall was discussed in the Statement of Common Ground on 9th December 2025. Added that this matter would be covered in the next meeting</p>	<p>National Grid will continue to meet and work with EWT to understand the opportunities for both parties in relation to wider BNG and Abbots Hall.</p>	<p><b>7.1 Biodiversity Net Gain Report [APP-299]</b></p>

ID	Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
		around BNG with the Wildlife Trusts and National Grid.		
7.9	Cumulative Effects	<p>Essex Wildlife Trust highlighted in their Relevant Representation dated 11 November 2025 the following comments:</p> <ul style="list-style-type: none"> <li>We may wish to discuss further the assessment of cumulative impacts with other developments in Essex. Essex is subject to multiple major infrastructure projects that will cumulatively fragment ecological networks and reduce habitat connectivity. The ES states that “The inter-project effects for ecology and biodiversity receptors during construction and operation were assessed as negligible and not significant.” This conclusion appears to underestimate the genuine cumulative burden on Essex's biodiversity from multiple concurrent major infrastructure projects.</li> </ul>	<p>National Grid provides the following response to Essex Wildlife Trust’s comments raised in their Relevant Representation regarding cumulative effects</p> <ul style="list-style-type: none"> <li><b>(6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b> has been undertaken in accordance with the Scoping Report and Scoping Opinion. No significant cumulative biodiversity effects have been identified on biodiversity within Essex. This is also concluded within <b>5.3 Habitats Regulations Assessment Report [APP-082]</b>.</li> </ul>	<p><b>5.3 Habitats Regulations Assessment Report [APP-082]</b> <b>6.17 Chapter 17: Cumulative Effects of the ES [APP-281]</b></p>
7.10	Survey Deficiencies	<p>Essex Wildlife Trust highlighted in their Relevant Representation dated 11 November 2025 the following comments:</p>	<p>National Grid provides the following response to Essex Wildlife Trust’s comments raised in their Relevant Representations regarding survey deficiencies</p>	<p><b>6.8 Environmental Statement Chapter 8 - Ecology and</b></p>

ID	Issue	Essex Wildlife Trust position	National Grid response	Relevant documentation
		<ul style="list-style-type: none"> <li>Currently the baseline ecological assessment is incomplete. The ES acknowledges that 12.5% of the site had not yet been surveyed for habitats at ES submission, protected species surveys are incomplete, and surveys are continuing into 2025. We may wish to comment on the updated impact assessment and adequacy of proposed mitigation measures.</li> </ul>	<ul style="list-style-type: none"> <li>Survey results from 2025 (including otter, water vole and bat roost inspections) are presented within the updated <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b> which was submitted to the Planning Inspectorate in November 2025. Conclusions in the assessment have not changed as a result of the 2025 surveys undertaken.</li> </ul>	<b>Biodiversity [AS-026]</b>
7.11	Legislation and Policy Compliance	<p>Essex Wildlife Trust highlighted in their Relevant Representation dated 11 November 2025 the following comments:</p> <ul style="list-style-type: none"> <li>We may wish to comment on whether the scheme as currently proposed complies with The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations), the NERC Act 2006 Section 40, the Environment Act 2021, the NPPF (December 2024) paragraphs 185, 186, and 187, and National Policy Statement EN-1</li> </ul>	<p>National Grid provides the following response to Essex Wildlife Trust’s comments raised in their Relevant Representation regarding legislation and policy compliance deficiencies</p> <ul style="list-style-type: none"> <li>The Applicant considers that the environmental assessment is compliant with the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations), the NERC Act 2006 Section 40, the Environment Act 2021, the NPPF (December 2024) paragraphs 185, 186, and 187, and National Policy Statement EN-1.</li> </ul>	

## 8. Signatures

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

For National Grid

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

For Essex Wildlife Trust

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

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