

AENC-NG-CNS-REP-0241

Norwich to Tilbury

Volume 8: Examination Documents

**Document: 8.3.25 Draft Statement of Common Ground - Pivoted
Power (Pivot Battery Project) - Tracked Changes Version**

Final Issue B

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nationalgrid

Revision History

<u>Version</u>	<u>Date</u>	<u>Submitted at</u>
<u>A</u>	<u>26 February 2026</u>	<u>Deadline 1</u>
<u>B</u>	<u>12 May 2026</u>	<u>Deadline 4</u>

Pivoted Power (Pivot Battery Project)

Draft Statement of Common Ground

1. Purpose of the Statement of Common Ground

This Statement of Common Ground (SoCG) has been prepared to reflect the current understanding of the areas of agreement and any remaining points of discussion between National Grid and Pivoted Power regarding specific issues arising during construction, operation, maintenance and decommissioning of the proposed Norwich to Tilbury Project (the Project) and its interface with Pivoted Power assets. The aim is to clarify the shared understanding of any issues and facilitate an efficient resolution process. The SoCG is intended to be a live document and will be updated as necessary throughout the pre-examination and examination stages of the DCO process.

2. Parties to the SoCG

This SoCG is agreed between National Grid and Pivoted Power LLP.

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.

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
<u>7.1</u>	<u>Agreement needed on how NG and PP will coexist and be formally documented</u>	<u>Discussions likely to continue beyond deadline 7</u>
<u>7.2</u>	<u>Ensuring NG's haul road access does not compromise PP's easement, while allowing both parties required access</u>	<u>Discussions likely to continue beyond deadline 7</u>
<u>7.3</u>	<u>Confirmation that NG's works will not damage, obstruct, or require alterations to PPs cable, and that access will be protected</u>	<u>By deadline 7</u>
<u>7.4</u>	<u>Agreement on safeguarding measures, working methods, and coordination to protect PP's cable during NG works</u>	<u>By deadline 7</u>
<u>7.5</u>	<u>Whether protective provisions or a side agreement will</u>	<u>By deadline 7</u>

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
	<u>be secured where NG's order limits overlap PP's cable easement</u>	

4. ~~3.~~ Background

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

National Grid Electricity Transmission plc ('National Grid') owns and maintains the national high voltage electricity transmission network throughout England and Wales. The transmission network connects the power from where it is generated to the regional Distribution Network Operators who then supply businesses and homes.

National Grid holds the Transmission Licence for England and Wales, and its statutory duty is to develop and maintain an efficient, coordinated and economical system of electricity transmission and to facilitate competition in the generation and supply of electricity, as set out in the Electricity Act 1989.

National Grid has developed plans for Norwich to Tilbury (referred to as the 'Project'). The Project would support the UK's net zero target through the connection of new low carbon energy generation in East Anglia and by reinforcing the transmission network.

The Project comprises reinforcement of the transmission network between the existing Norwich Main Substation in Norfolk and Tilbury Substation in Essex, via Bramford Substation, the new East Anglia Connection Node (EACN) Substation and the new Tilbury North Substation.

The reinforcement is needed because the existing transmission network, even with current upgrading, will not have sufficient capacity for the new renewable energy (a substantial proportion of which would be generated by offshore wind) that is expected to connect to the network over the next 10 years and beyond. Completion of the Project, together with other new reinforcements across the country, will meet this future energy transmission demand both in East Anglia and across the UK.

The Project is a Nationally Significant Infrastructure Project (NSIP), and National Grid is seeking development consent under statutory procedures set by government. NSIPs are projects of certain types, over a certain size, which are considered by the government to be of national importance, hence permission to build them needs to be given at a national level, by the relevant Secretary of State (in this case the Secretary of State for Energy Security and Net Zero). Instead of applying to the local authority for planning permission, the developer must apply to the Planning Inspectorate for a Development Consent Order (DCO) that would grant development consent.

National Grid will submit an application for development consent to the Planning Inspectorate. The Examining Authority (consisting of one or more examining inspectors), after a period of public examination, would make their recommendation to the Secretary of State for Energy Security and Net Zero, who in turn would decide on whether development consent should be granted for the Project.

The Project is identified as critical to delivering a network which supports the clean power pathways for 2030 delivery.

The Planning Act 2008 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 and one statutory consultation to inform its proposals, with further recent targeted consultations.

5. ~~4.~~ Stakeholder Interests

Pivoted Power LLP is a wholly owned subsidiary of EDF Energy Renewables Limited. Pivot is developing a battery energy storage system on privately owned land east of Norwich Main substation (“the Pivot Battery Project”). Rights for the cable route connecting the Pivot Battery Project to the NGET Norwich Main substation were granted by National Grid Electricity Transmission plc (“NGET”) under a Deed of Easement dated 18 July 2025. Part of the Pivot cable route is included in the Order Land.

National Grid is seeking to ensure that the interests of both parties and how they may be affected by the interaction are understood. From this position the aim is for the parties to agree actions to avoid or reduce the implications and for any remedial measures to be agreed. On this basis we seek the input from Pivoted Power to demonstrate how their interests may be affected, how Pivoted Power or National Grid and its contractors can collectively reduce those effects and input to agree the implementation of such measures.

The chronology of National Grid’s engagement with Pivoted Power to date, and the evolution of the Project’s design is summarised as follows:

Discussion held on 14th April 2025

Letter Received 17th July 2025

[The parties continue to engage through regular email correspondence in relation to the matters described in this Statement of Common Ground.](#)

6. ~~5.~~ Matters Agreed

ID	Issue	Agreement reached	Date agreed	Relevant documentation
5.16.1				

7. ~~6.~~ Matters Currently Under Discussion

ID	Issue	<u>National Grid Position</u>	Stakeholder position <u>Position</u>	National Grid position	Relevant documentation
6.17.1	Project interface	<u>The Applicant and the stakeholder agree about project interaction, with already existing arrangements and suitable mitigation arrangements put in place.</u>	From Relevant Representation: Pivot believes <u>NGET's</u> requirement for the <u>believe</u> NG's use of the Pivot cable route land can exist in tandem with its own requirements and that NGET should coexist with PP's infrastructure <u>Pivot expects NG to continue to engage in full and meaningful negotiations with Pivot to document such interface arrangements. Pivot and NGET continue to engage in discussions</u>	National Grid commit to continue discussions with Pivoted Power to understand project interfaces and mitigation arrangements.	Pivoted Power LLP Relevant Representation (ref: RR-2963)

ID	Issue	<u>National Grid Position</u>	Stakeholder position <u>Position</u>	National Grid position-	Relevant documentation
			with the hope of entering into a formal agreement addressing Pivot's concerns. However, at the date of this representation, no agreement has been entered into between Pivot and NGET.		
6.27.2	Access Haul Road	<p><u>The Applicant cannot accept the request in its current form because NG required 24/7 access to the haul road for essential construction activities</u></p> <p><u>The Applicant will work with PP to find a mutually acceptable solution if access is needed during or after construction.</u></p>	<p>Letter from Eversheds dated As stated in the Evershed letter (17th July 2025 relates to key points, point 1 details the following):</p> <p>That the proposed Ng's works must not interfere with or compromise the PP's easement granted to our clients.</p> <p>The cable infrastructure must be afforded full protection throughout the duration of any fully protected during construction, operational, or operation, and maintenance activities associated with of the Project.</p> <p>project Currently this is the stakeholders position pending</p>	<p>National Grid's position is that, in relation to key point 1 from the letter received from Eversheds, the request cannot be accepted on the basis that:</p> <p>National Grid also require access and egress to the haul road and the access route, and this must be maintained 24/7 to allow for the necessary construction activities.</p> <p>Should Pivoted Power require any access for maintenance or operation past the initial construction phase, National Grid will work with Pivoted Power to seek to adopt a solution that suits both parties.</p>	

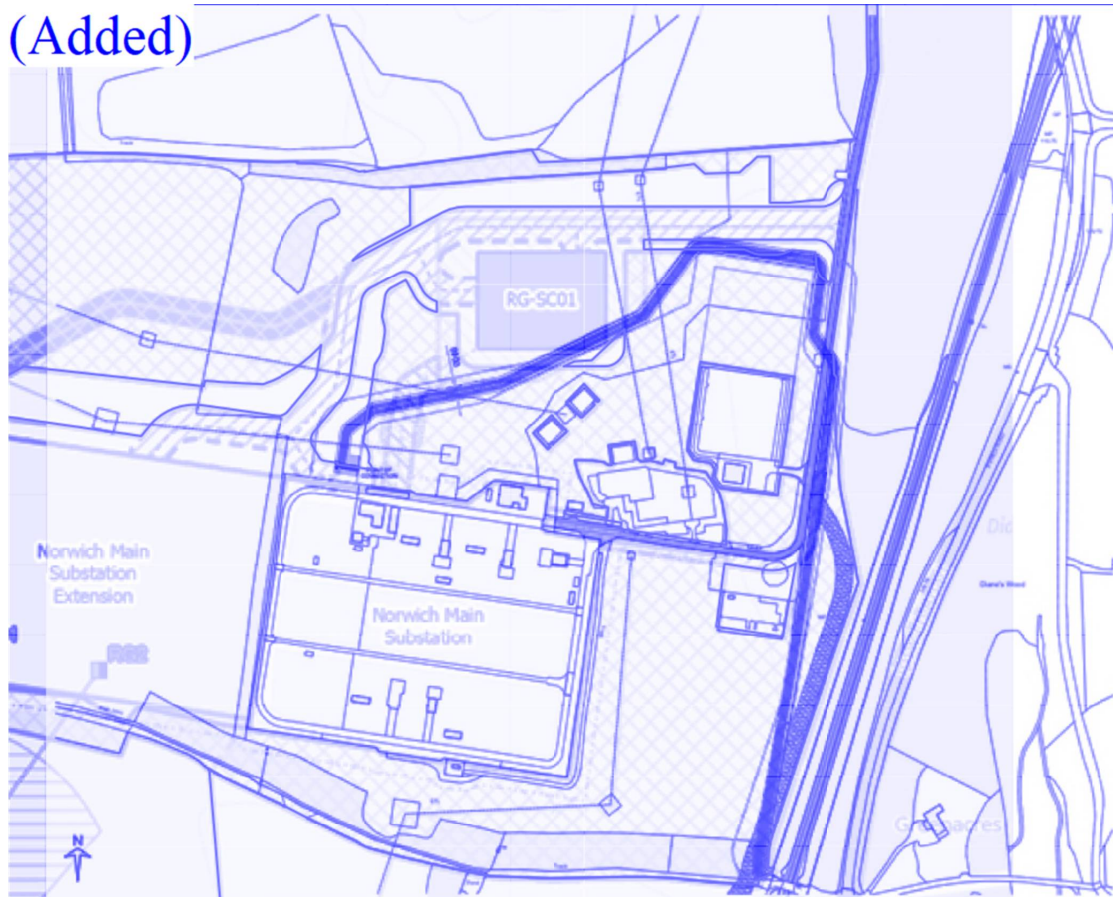
ID	Issue	<u>National Grid Position</u>	<u>Stakeholder position</u>	National Grid position	Relevant documentation
			further discussion.		
6.37.3	Cable Installation	<p><u>The cable has been installed, with fibre optic pull due for completion by March 2026</u></p> <p><u>The Applicant will work with PP regarding any operational/maintenance access required post construction</u></p> <p><u>The Applicant is committed to further discussion and to agreeing either protective provisions or a side agreement.</u></p>	<p><u>Letter from As stated in the Eversheds dated letter (17th July 2025 relates to key points, point 2 details the following), PP required written confirmation that NG's works will not:</u></p> <p>That National Grid is requested to confirm in writing that no part of the proposed works will:-</p> <ul style="list-style-type: none"> • Damage, prevent or obstruct the installation-or/operation of the cable;- • Require <u>removal, diversion, or relocation</u> of the cable to be removed, diverted, or relocated;- • Impede access to the cable for maintenance or operational purposes <p><u>operations</u> Currently this is the stakeholders position pending further discussion.</p>	<p>Cable has been installed and is awaiting fibre optic pull due to be completed by the end of March 2026.</p> <p>Should Pivoted Power require any access for maintenance or operation past the initial construction phase, National Grid will work with Pivoted Power to adopt a solution that suits both parties.</p> <p>NG is committed to further discussions in order to agree further protective provision or to entering into a side agreement.</p>	
6.47.	Co-ordination	<u>Regular coordination meetings</u>	Letter from Eversheds dated As	At present, there are regular,-	

ID	Issue	<u>National Grid Position</u>	<u>Stakeholder position</u>	<u>National Grid position</u>	Relevant documentation
4	n and safeguarding measures	<p><u>are already taking place with customers.</u></p> <p><u>The Applicant is committed to continuing discussions and agreeing protective provisions or a side agreement.</u></p>	<p><u>stated in the Evershed letter (17th of July 2025 relates to key points, one of which is 3), PP required:</u></p> <p>That appropriate <u>Appropriate</u> safeguarding measures will be implemented to ensure the integrity of <u>measured to protect</u> the cable and associated infrastructure, including coordination with our clients or their appointed representatives prior to the commencement of any works in the vicinity as well as agreement</p> <p><u>Coordination with PP/their representatives before any works begin</u></p> <p><u>Agreement</u> of working methods and protection arrangements.</p> <p>Currently this is the stakeholders position pending further discussion.</p>	<p>ongoing coordination meetings between NG and customers to ensure that the interests of both scopes are delivered.</p> <p>NG is committed to further discussions in order to agree further protective provision or to entering into a side agreement.</p>	
6.57.	Protective	<u>The Applicant is committed to</u>	<u>Letter from Eversheds dated As</u>	NG is committed to further	

ID	Issue	<u>National Grid Position</u>	Stakeholder position <u>Position</u>	National Grid position-	Relevant documentation
5	Provisions	<u>further discussions to agree protective provisions or to enter into a side agreement.</u>	<p><u>stated in the Evershed letter (17th July 2025 relates to key points, one of which is 4:)</u></p> <p>That to the extent that<u>Where</u> the DCO order limits overlap with the proposed cable easement area, that, protective provisions or a side agreement are entered into to address matters<u>must be put in place covering issues raised in points 1-3</u> above.</p> <p>Currently this is the stakeholders position pending further discussion.</p>	discussions in order to agree further protective provision or to entering into a side agreement.	

Figure 1 Pivoted Powers interaction with the Norwich substation

(Added)



8. ~~7.~~ Signatures

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

For National Grid

Name: _____

Position: _____

Date: _____

For Pivoted Power LLP

Name: _____

Position: _____

Date: _____

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Changes:	
<u>Add</u>	58
Delete	64
Move From	0
<u>Move To</u>	0
<u>Table Insert</u>	8
Table Delete	7
<u>Table moves to</u>	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	1
Embedded Excel	0
Format changes	0
Total Changes:	138