



Suffolk Wildlife Trust Response to The Examining Authority's written questions and requests for information (ExQ2): Issued on 22nd May 2026

Deadline: 10th June 2026

Planning Inspectorate Ref: EN020027

Suffolk Wildlife Trust Registration Identification Ref: [REDACTED]

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10th June 2026

RE: Deadline 5 | Suffolk Wildlife Trust Response to The Examining Authority's written questions and requests for information (ExQ2): Issued on 22 May 2026 | Questions BIO 2.1, BIO 2.8, BIO 2.S4, and BIO 2.S5

Dear Planning Inspector,

I write with reference to the proposed Norwich to Tilbury Project (EN020027). Following the publication of written questions and requests for information by the Examiner ([ExQ2](#)), Suffolk Wildlife Trust are happy to provide the following detail relating to Question BIO 2.1, BIO 2.8, BIO 2.S4, and BIO 2.S5.

Detailed responses are included overleaf, with questions included for ease of reference.

Please reach out with any further questions,

Yours sincerely,



Planning & Advocacy Officer

BIO 2.1

Assessment of biodiversity deficit

In response to ExQ1 BIO 1.4 the applicant has stated that replacement planting and habitat creation is identified as embedded/ standard mitigation within the outline Landscape and Ecological Management Plan (outline LEMP). The applicant considers that with this in place there would be no 'biodiversity deficit'.

To applicant: However, the ExA notes that as indicated in image 4.1 of ES Chapter 4 [APP-130] the overall construction programme, for example, for the Dedham Vale National Landscape the enabling works through to the initial energisation would take almost 4 years. Using this as an example and noting that up to a 120 metre (m) swathe of vegetation would need to be removed for the proposed underground cabling (and with a further 50m either side being "potentially

affected") set out the worst-case scenario in time period from vegetation being removed to when you consider the replanted vegetation would reach a similar degree of maturity. Also, the applicant is requested to further explain its statement in response to BIO 1.4 that ES Chapter 8 [AS-026] has taken into account any short term temporary effects on ecological receptors – explain this with worked through examples, such as for hedgerow species and also for bats, to demonstrate how impacts on biodiversity have been assessed for this intervening period.

To all local authorities and Wildlife Trusts: **Set out your views on the potential for there to be biodiversity deficit and whether you consider this has been properly assessed in ES Chapter 8 and mitigated for by the applicant. Explain any outstanding concerns and what (if any) additional measures you would wish to see the applicant implement.**

Suffolk Wildlife Trust Response:

It is the view of Suffolk Wildlife Trust that this matter can be viewed from two perspectives; through Biodiversity Net Gain on the one hand and through impacts to species (which are not considered under Biodiversity Net Gain assessment) on the other.

The Applicant will follow revised TCPA guidance, which Suffolk Wildlife Trust do not raise issue with, when undertaking their Biodiversity Net Gain assessment and using the Statutory Biodiversity Metric; this is confirmed within [Document: 7.1 Biodiversity Net Gain Report](#). Therefore, where habitats are deemed to be 'lost' for the purposes of BNG, any delay in starting creation or enhancement must be considered within the Statutory Metric (i.e. using the delay in restoration/ creation function) and will require additional habitat creation or enhancement to compensate for the delay. The applicant has confirmed that delivering at least 10% net gain is not possible and onsite and will be securing an overall net gain by purchasing offsite Biodiversity Units. We support the Applicant's proposed approach to delivering offsite Biodiversity Net Gain through landscape scale habitat creation and enhancement in locations that Local Nature Recovery Strategies indicate will make a meaningful contribution towards strategic nature recovery. We are satisfied that, subject to the delivery of habitat reinstatement in accordance with the details provided in the Outline LEMP and requisite off-site Biodiversity Units being secured, there will not be a biodiversity deficit with respect to BNG.

Separately from Biodiversity Net Gain, at a species impact level, Suffolk Wildlife Trust would agree that a short-term and localised biodiversity deficit may occur; this is most likely to occur where removal and reinstatement of habitat is planned. Until reinstated habitat, such as hedgerow, achieves equivalent maturity to temporarily removed habitat, the degree to which it supports use by species, such as foraging or commuting bats or nesting birds, is likely to be reduced compared with the removed habitat. The time it takes for reinstated habitat to achieve equivalent maturity and ecological function to removed habitat will be highly variable depending on the nature and condition of the original habitat it is replacing.

This temporary deficit could be mitigated by creating habitat of equivalent ecological value and function nearby in advance of the impact (removal) occurring; however, given that medium to long-term biodiversity impacts are expected to be positive (taking into account habitats created or enhanced for BNG) in this instance Suffolk Wildlife Trust acknowledges that requiring such measures might not be proportionate.

However, we have previously asked the Applicant to undertake additional monitoring during and post-construction of species such as bats. Such monitoring would increase understanding and improve the knowledge-base needed to design successful future mitigation for the biodiversity deficit which occurs at this stage of similar projects. While such monitoring would not avoid or mitigate the short-term biodiversity deficit associated with this project, it could contribute to improved understanding and mitigation design for future projects. In our opinion this would offer wider conservation benefits which contribute to a suitable project legacy.

BIO 2.8

Monitoring the effects on birds

In response to ExQ1 BIO 1.13 regarding the use of bird diverters the applicant in [REP3-074] states that ES Chapter 8 [AS-026] and the Habitat Regulations Assessment (HRA) Report [APP-082] predict no significant adverse effects on birds during operation of the proposed development either with or without mitigation and therefore additional monitoring or adaptive management is not considered necessary or proportionate. **Do you agree with the applicant's comments in this regard, if not then please explain why and set out what additional monitoring and (if necessary) adaptive management you would wish to see secured.**

Suffolk Wildlife Trust Response:

Suffolk Wildlife Trust discussed this matter with the applicant prior to Deadline 3, raising our concerns which were outlined in our response to [ExQ1](#); the applicant proposed to take this query to their specialist ornithology team. Feedback from this query was provided to us on 5th June 2026, with the Applicant giving rationale as to why diverters are not proposed directly to the south of the River Waveney, in the area illustrated on Page 3 of our response to [ExQ1](#). Given the timing of the Applicant's response to our concerns, we have not had time to adequately review our position.

If additional monitoring of the crossing to assess whether the area of bird diverters should be increased is viable, then Suffolk Wildlife Trust would support its inclusion; our understanding is that such monitoring would be notably difficult. Therefore, our preference is a precautionary approach which sees the installation of diverters at construction phase alongside the main area of diverters proposed in the Waveney Valley.

BIO 2.S4

Schedules 3, Requirement 4 – (Construction Management Plans) 2

WaLOR Project - Embedded, standard and additional mitigation measures secured by the outline CoCP secured by Requirement 4.

SWT in its deadline 4 submission [REP4-373] states the response in Document: 8.8.1 Applicant's Comments on Written Representations, that "The Applicant's 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" is not sufficient.

It seeks a commitment that the Main Works Contractor(s) engaging with the WaLOR project team during detailed design development, to avoid any potential for conflicts between the two projects. It seeks the strengthening of the outline LEMP to ensure communication and coordination is guaranteed and that the detailed design and implementation of works by the applicant's Main Works Contractor(s) is compatible with the WaLOR project's planned river and floodplain habitat restoration works where the location of these overlaps with the Norwich to Tilbury project.

The applicant is asked to amend the outline LEMP accordingly or explain, in full, why you consider such an amendment is not necessary.

SWT are asked to provide a form of wording for potential inclusion within the outline LEMP, which adequately addresses your concern, in the absence of applicant's failure to adequately satisfy the ExA in this regard.

Suffolk Wildlife Trust Response:

Suffolk Wildlife Trust has discussed this matter with the Applicant and understand that wording which addresses our concern by formalising the requirement for liaison with the WaLOR Project team during detailed design is to be included in an updated Outline LEMP.

This wording confirms that ongoing consultation will be undertaken by both the Main Works Contractor(s) and UK Power Networks for works between pylons RG84 and RG89, to ensure compatibility between the projects from both an engineering and programme perspective.

The Applicant has also shared an updated Statement of Common Ground with Suffolk Wildlife Trust that includes a commitment that the Main Works Contractor, including UK Power Networks, will consult with the WaLOR Project team on relevant detailed design parameters 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.

BIO 2.S5

Schedules 3, Requirement 4 (Construction Management Plans) 3

The formation of an Ecology Working Group is referenced in the updated outline LEMP [REP3-030] that is secured by Requirement 4

SWT in its deadline 4 submission [REP4-373] highlights the role of an Ecology Working Group. It has previously mentioned an Ecology Advisory Group in its deadline 1 submission [REP1-278]. The deadline 4 submission states the role of such a group must be strengthened within the DCO and it seeks to ensure such a group has a formal role in advising on the development and delivery of the LEMP, including any required adaptive management, as opposed to a group which would primarily receive updates from the applicant.

Babergh and Mid Suffolk District Councils also make reference to the Tilbury Ecological Working Group and the need for the outline CoCP and outline LEMP to be updated.

SWT advises it has provided a draft of a document to the applicant related to a proposed DCO requirement for an Ecology Working Group, as part of its submission documents and urge this to be used as a blueprint for the group. The ExA seeks clarification from SWT as to where within its submissions this document can be located. Is it referring to paragraph 2.3.1 of [REP1-278] or is referring to another document? The applicant is asked for its response to the document referred to by the SWT, along with a form of wording for inclusion within the draft DCO and/ or outline LEMP securing such a commitment to an Ecology Working Group or a detailed explanation as to why such a commitment is not required.

SWT – Provide a form of wording for potential inclusion within the outline DCO and/ or the outline LEMP, which adequately addresses this matter, in the event the applicant fails to adequately satisfy the ExA in this regard.

Suffolk Wildlife Trust Response:

Following conversation with other ecology stakeholders, including affected Local Authorities Wildlife Trusts, Suffolk Wildlife Trust are happy to support the wording for an Ecology Working Group (which may also include Landscape consideration) proposed and submitted by Suffolk County Council at Deadline 5.