

AENC-NG-CNS-REP-0361

Norwich to Tilbury

Volume 8: Examination Documents

**Document: 8.3.91 Draft Statement of Common Ground - Aura Power
(Marsh Lane Solar Farm)**

Final Issue A

June 2026

Planning Inspectorate Reference: EN020027

nationalgrid

Aura Power (Marsh Lane Solar Farm) 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 Aura Power regarding specific issues arising during construction, operation, maintenance and decommissioning of the proposed Norwich to Tilbury Project (the Project) and its interface with the consented Marsh Lane Solar Farm, to be constructed north of Lion Road, Palgrave, in the parishes of Wortham And Diss. 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 between National Grid (the Applicant) and Aura Power.

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	Haul Road location intersects an area of Aura Power's ecological enhancements, required for their development's biodiversity net gain provision	At detailed design, likely after deadline 7
7.2	Removal of Pulling Zone	Deadline 7
7.3	Location of the Project's sustainable drainage systems (SuDs) and concern regarding potential flooding in the area	At detailed design, likely after deadline 7
7.4	Skylark Mitigation location is no longer suitable due to pylon RG91 and would need relocating.	Likely after deadline 7 – matter related to the implementation of Aura Power's Section 106 agreement

SoCG ID	Summary of matter under discussion	Deadline for resolution
7.5	Access Rights overlap with Aura Power’s underground cabling	Likely after Deadline 7
7.6	Overhead Line Impact on Solar Panels and whether Aura Power can install panels under the overhead line	Likely after Deadline 7
7.7	Book of Reference - this is inaccurate and Aura Power would like it updated.	Deadline 7

4. Background

4.1 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 has submitted an application for development consent to the Planning Inspectorate. The Examining Authority (consisting of five examining inspectors), after a period of public examination, will make their recommendation to the Secretary of State for Energy Security and Net Zero, who in turn will 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. Stakeholder Interests

Aura Power has legal interests that have the potential to interact with the Project. This has been identified as Land North of Lion Road Palgrave, in the parishes of Wortham and Diss. The development in question relates to the following description of development, as detailed on the relevant planning applications: *Cross Boundary Planning Application - Installation of a solar farm comprising: ground mounted fixed tilt bifacial solar panels; access tracks; string inverters; transformers; electrical connection compound; storage containers; underground cables and conduits; perimeter fence; temporary construction compound and associated infrastructure and planting scheme.*

Mid-Suffolk District Council Planning Committee resolved unanimously to approve the solar project in April 2025, with the Decision Notice issued on 13 August 2025 (LPA ref: DC/23/05426). The development in question also includes planning permission for the underground cable route connecting the solar project to Diss BSP, which was granted on 7 April 2025 under delegated powers by South Norfolk District Council (LPA ref: 2023/3574). A Section 106 Agreement between Mid Suffolk District Council, Aura Power (via Aura Power's wholly owned SPV, Haedus Solar Ltd), and the Landowner (Rookery Farm Ltd) was subsequently entered into on 8 August 2025 obliging Aura Power to provide skylark plots in the immediate vicinity of the Norwich to Tilbury Project. Work is ongoing to discharge pre-commencement conditions on the planning permissions.

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 Aura Power to demonstrate how their interests may be affected, how Aura Power or National Grid and its contractors can collectively reduce those effects and input to agree the implementation of such measures.

Engagement History

- Non-statutory consultation April - June 2022 (graduated swathe), non-statutory consultation June – August 2023 (draft alignment), Statutory consultation April – July 2024, Landowner consultation June – July 2025
- Teams Meeting Date: 30 June 2023, 17 January 2025, 28 April 2026
- The parties continue to engage through regular email correspondence in relation to the matters described in this Statement of Common Ground.

6. Matters Agreed

ID	Issue	Agreement reached	Date agreed	Relevant documentation
6.1				

7. Matters Under Discussion

ID	Issue	National Grid position	Stakeholder position	Relevant documentation
7.1	Haul Road	<p>The Applicant acknowledges the concerns raised regarding the alignment of the haul road between RG92 and RG91, particularly in relation to potential impacts on Aura Power’s proposed Biodiversity Net Gain (BNG) wildflower planting and skylark mitigation area.</p> <p>The Applicant is currently reviewing options to refine the Project alignment, including rerouting around RG91 where reasonably practicable to minimise encroachment. However, beyond this localised adjustment, the alignment is constrained by land availability and access requirements and is expected to remain broadly as proposed.</p> <p>With regard to the potential transfer of land from Grange Farm to Aura Power, the Applicant notes that discussions are ongoing and may not be</p>	<p>The current alignment of the haul road between RG92 and RG91 follows the site boundary before crossing through a proposed new hedgerow and new 10m deep treebelt, then diverting into an area identified for wildflower planting and skylark mitigation, which would adversely affect the proposed Biodiversity Net Gain (BNG) habitat and landscaping that Aura Power is obliged to achieve under the extant planning permissions, as well as the ability to deliver skylark plots in line with Aura Power’s obligations under a Section 106 Agreement. Clarification is therefore required on how this impact will be mitigated, or whether the alignment will be</p>	

ID	Issue	National Grid position	Stakeholder position	Relevant documentation
		<p>concluded prior to construction. The haul road alignment will therefore be finalised based on registered ownership at the time of detailed design and will not be amended following construction commencement as a result of any subsequent land transfer.</p> <p>The haul road will comprise a 4m running width, locally widened to 8m at passing places, with additional working width required for fencing, subsoil storage and drainage swales.</p> <p>The Applicant will continue to review the design and engage with Aura Power to ensure an appropriate balance between construction, environmental, and land use considerations.</p> <p>The Applicant will review losses claimed and will address them in line with the statutory compensation code, ensuring affected parties are appropriately compensated for impacts experienced.</p>	<p>amended. Aura Power expects full compensation should the BNG enhancements of skylark mitigation proposed cannot be, or is not, achieved due to the Project. Aura Power also expects full compensation for any additional costs or lost revenue incurred by the solar project and its cable route due to the Project or rights exercised by National Grid</p> <p>The haul road is partly located within land owned by the adjacent title SK174841, part of which is subject to a claim for possession and may be transferred to Aura Power for potential inclusion within the Solar Project. The current alignment could constrain this future use and may require relocation or redesign.</p> <p>The stakeholder also seeks clarification on the proposed haul road width, including temporary and permanent working widths, and the dust mitigation measures to be implemented during construction, particularly given the proximity to sensitive receptors such as solar panels and other associated equipment.</p>	

ID	Issue	National Grid position	Stakeholder position	Relevant documentation
			<p>Further clarification is required on how these matters will be addressed within the final scheme.</p> <p>Should land that Aura Power has rights over be affected (either temporarily or permanently) by the Project, Aura Power affirms its position that it will be entitled to compensation for all costs and loss of revenue related to any land taken and any impact the Project has on the Solar Project and its underground cable route.</p> <p>This compensation must recognise that the Solar Project is a committed development, following the grant of planning permission, the discharge of planning conditions in 2026, and the scheduled commencement of construction in 2027 and beyond.</p>	
7.2	Pulling zone	<p>The Applicant confirms that the pulling zone currently shown at RG91 is no longer required for construction. It remains indicated on the plans at this stage as part of the preliminary design; however, it will be removed or not implemented as the design is finalised.</p> <p>The pulling zone is the yellow hatched area that covers RG91.</p>	Please confirm what area this covers, as it is not displayed in the legend of the plan in Image 7.1	

ID	Issue	National Grid position	Stakeholder position	Relevant documentation
7.3	Sustainable Drainage System (SuDS)	<p>The Applicant acknowledges the request for clarification regarding the proposed SuDS features. The drainage strategy primarily incorporates permanent above-ground SuDS features, such as swales and attenuation areas, where practicable, to provide both drainage and environmental benefits.</p> <p>The design has taken account of the presence of the existing pond and the known flood risk in the area. SuDS features will be designed to manage runoff appropriately, ensuring no increase in flood risk on or off site and maintaining suitable separation from existing water features.</p> <p>Further detail will be provided as the drainage design is progressed in accordance with the Outline Drainage Strategy.</p> <p>With reference to the Skylark Mitigation areas, please see the Applicant's response in ID 7.4 below.</p>	<p>The stakeholder seeks clarification on whether the proposed Sustainable Drainage Systems (SuDS) features are to be located above or below ground, and whether they are temporary or permanent. Concern is also raised regarding the presence of an existing pond and the known flood risk within the area, and how these constraints have been addressed within the drainage design.</p> <p>Concern is further raised that the proposed SuDS are located within an area marked on the Solar Project layout plan as 'Retained Agricultural Land with Skylark Mitigation' which could adversely impact Aura Power's ability to deliver skylark plots in line with its obligations within a Section 106 Agreement. Aura Power expects full compensation should the local authority require relocation of off-site skylark plots and all associated costs that would be required to do so.</p>	
7.4	Skylark Mitigation	<p>In the event that the local authority request Aura Power to relocate their skylark plots, the Applicant will review losses claimed and will address them in</p>	<p>The local authority approved the 'Retained Agricultural Land with Skylark Mitigation' and 'Wildflower Planting with Skylark</p>	

ID	Issue	National Grid position	Stakeholder position	Relevant documentation
		<p>line with the statutory compensation code, ensuring affected parties are appropriately compensated for impacts experienced.</p>	<p>Mitigation' areas on the solar layout plan as suitable for skylark plots to be provided in, which is secured by a Section 106 Agreement. RG91 would act as a predator perch, therefore RG91 and all associated works and rights connected with the Project could adversely impact the ability for skylark plots to be delivered in these areas. Aura Power expects full costs to be covered should the local authority require skylark plots to be provided elsewhere.</p>	
7.5	Access Rights	<p>The Applicant acknowledges Aura Power's concerns in regard to the permanent access that crossing their underground cabling. The Applicant confirms that this permanent access is not a constructed road, but rather a post-construction maintenance route to the pylons for access on foot and/or with a van.</p> <p>Should the Aura Power cable be constructed first, the Applicant will work with the stakeholder with a view to entering into a Protective Provisions Agreement in relation to the asset.</p>	<p>Permanent rights of access to pylons RG89, RG90 and RG91 cross over Aura Power's underground cable route which will be secured via a legal easement from the solar site to the point of grid connection at Diss BSP. If Aura Power's cable is constructed first then the expectation is that indemnities and safe construction practices will need to apply where the access rights cross the cable easement area, as well as costs covered by the Project for Aura Power to reinforce the sections of underground cable with ducting that will be projected to be crossed by the access rights, and compensation</p>	

ID	Issue	National Grid position	Stakeholder position	Relevant documentation
			<p>will apply should exportation of electricity from the solar farm be affected due to any damage to the solar project's cable as a result of the Project. However, if the Project is constructed first then practical consideration for Aura Power to be able to install its cable route needs to apply, or compensation be paid should the Project affect the Solar Project, including but not limited to its installation and energisation.</p>	
7.6	Overhead Line Impact on Solar Panels	<p>The Applicant confirms that PV solar panels can be installed under the overhead line in the long term. For construction of the overhead line, the Applicant expects that any panels directly under the overhead line will need removal where they are less than 10m from the outer conductor. The Applicant will provide a drawing showing this zone with your panels overlaid if Aura Power provide a DWG panel layout file.</p> <p>If Aura Power install the panels ahead of the Project's overhead line construction, the Applicant would prefer that they are easily isolatable and removeable. In this circumstance, the Applicant would be open to reviewing an evidence based compensation claim in relation to this specific flexibility measure.</p>	<p>As shown in Image 1, part of the new overhead line between RG91 and RG92 is above panels on the Solar Project. Thus may require significant setback of panels if required by NGET operations, in which case Aura Power expects full compensation for loss of revenue over the lifetime of the Solar Project as a result of any solar panels consented prior to the Project's DCO application being accepted that would not subsequently be able to be installed due to the Project.</p>	

ID	Issue	National Grid position	Stakeholder position	Relevant documentation
7.7	Book of Reference	The Applicant notes Aura Power’s feedback in relation to 4.3 Book of Reference [REP4-050] and will address this accordingly.	<p>The Project has not accurately captured all of Aura Power’s interests in land affected by this DCO application.</p> <p>Haedus Solar Ltd (company no. 13663837) is the solar project SPV ultimately owned by Aura Power Developments Ltd and holds a restriction on title SK176181 in the form of an option to lease that has not been recorded in the Book of Reference.</p> <p>Haedus Solar Ltd needs to be registered as a Category 2 person on Plot Number: B-1/24, B-1/25, B-1/32, B-1/34, B-1/36, B-1/37, B-1/40, B-1/42, B-1/44.</p> <p>Aura Power Developments Ltd also has planning consent granted on 7 April 2025 by South Norfolk District Council (LPA ref: 2023/3574) for the solar project’s cable route across Plot Numbers: B-1/13, B-1/27, B-1/29.</p>	

Image 7.1 Interaction between Pylons RG91 to RG94 and Aura Power's proposed Solar Site and Underground Cable Route.

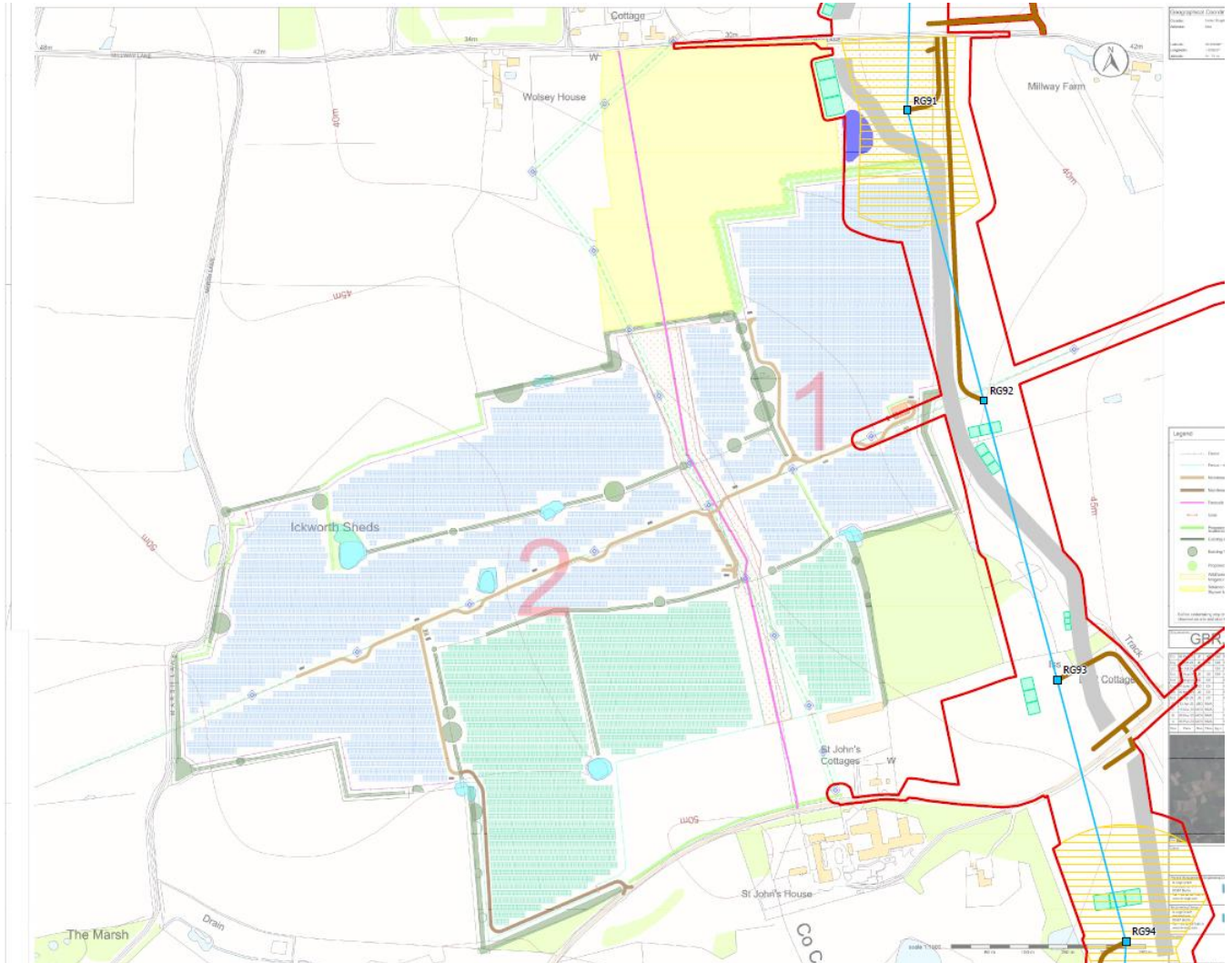
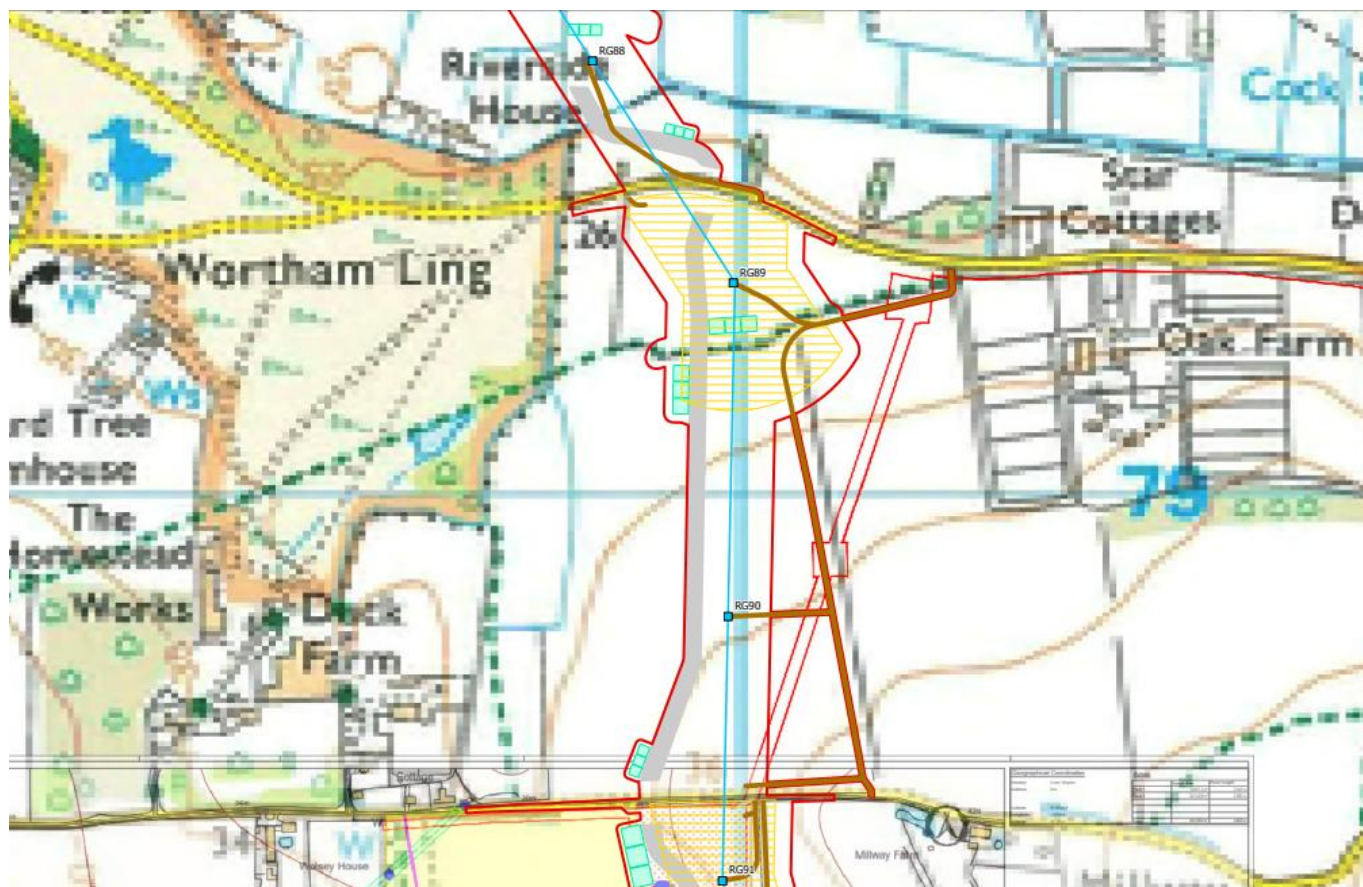


Image 7.2 Interaction between Pylons RG89 to RG91 and Aura Power's proposed Solar Site and Underground Cable Route.



8. Signatures

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

For National Grid

Name: _____

Position: _____

Date: _____

For Aura Power

Name: _____

Position: _____

Date: _____

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