



Planning
Inspectorate

REPORT on the IMPLICATIONS for EUROPEAN SITES

Proposed Norwich to Tilbury project

An Examining Authority report prepared with the support of the
Environmental Services Team

Planning Inspectorate Reference: [EN020027]

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1 INTRODUCTION

1.0 Background

- 1.0.1 National Grid Electricity Transmission ('the applicant') has applied for a Development Consent Order (DCO) under section 37 of the Planning Act 2008 (PA2008) for the proposed Norwich to Tilbury project ('the proposed development'). On behalf of the Secretary of State (SoS) for Housing, Communities and Local Government, an Examining Authority (ExA) has been appointed to conduct an examination of the application. The ExA will report its findings and conclusions and make a recommendation to the relevant SoS as to the decision to be made on the application.
- 1.0.2 For applications submitted under the PA2008 regime, the relevant SoS is the competent authority for the purposes of the Conservation of Habitats and Species Regulations 2017 ('the Habitats Regulations'). The findings and conclusions on nature conservation issues reported by the ExA will assist the SoS in performing their duties under the Habitats Regulations.
- 1.0.3 This Report on the Implications for European sites (RIES) documents and signposts the information in relation to potential effects on European sites that was provided within the DCO application and submitted during the examination by the applicant and interested parties (IPs), up to deadline 5 (D5) of the examination (10 June 2026). It is not a standalone document and should be read in conjunction with the examination documents referred to. Where document references are presented in square brackets [] in the text of this report, that reference can be found in the [Examination Library](#) published on the 'Find a National Infrastructure Project' website.
- 1.0.4 For the purpose of this RIES, in line with the Habitats Regulations and relevant Government policy, the term 'European sites' includes Special Areas of Conservation (SAC), candidate SACs, proposed SACs, Special Protection Areas (SPA), potential SPAs, listed and proposed Ramsar sites and sites identified or required as compensatory measures for adverse effects on any of these sites. For ease of reading, this RIES also collectively uses the term 'European site' for European sites as defined in the Habitats Regulations 2017 and 'European Marine Sites' defined in The Offshore Marine Habitats and Species Regulations 2017, unless otherwise stated. The 'UK National Site Network' refers to SACs and SPAs belonging to the United Kingdom already designated under the Directives and any further sites designated under the Habitats Regulations.
- 1.0.5 This RIES is issued to ensure that IPs including the Appropriate Nature Conservation Body (ANCB) - Natural England - are consulted formally on Habitats Regulations matters. This process may be relied on by the SoS for the purposes of regulation 63(3) of The Habitats Regulations.
- 1.0.6 It also aims to identify and close any gaps in the ExA's understanding of IPs' positions on Habitats Regulations matters, in relation to all European sites and

qualifying features as far as possible, in order to support a robust and thorough recommendation to the SoS.

- 1.0.7 Following consultation, the responses will be considered by the ExA in making its recommendation to the SoS and made available to the SoS along with this report. The RIES will not be revised following consultation.

1.1 Documents used to inform this report on the implications for European sites

- 1.1.1 The applicant's Habitats Regulations Assessment (HRA) Report ('the HRA Report') comprised the following document:

- Habitats Regulations Assessment [APP-082]

- 1.1.2 In addition to the HRA Report, the RIES refers to representations submitted to the examination by IPs, Statement of Common Ground (SoCG) and other examination documents as relevant.

1.2 Change Requests

- 1.2.1 To date, the applicant has made the following change requests:

- Change Request 1 (Bulphan) – [AS-049]
- Change Request 2 (Little Bromley) – [AS-050]

- 1.2.2 Section 3.3 of the Proposed Change Application 1 Overview Report - Change Request 1 (Bulphan) [CR1-102] provides an Addendum to the Environmental Statement. This states that no new or different likely significant effects (LSE) to those reported in the Environmental Statement have been identified as a result of Change Request 1 (Bulphan).

- 1.2.3 The applicant's Addendum to the Environmental Statement – Change Request 2 (Little Bromley) [CR2-016] also stated that there are no HRA implications resulting from Change Request 2.

- 1.2.4 The change requests were accepted by the ExA [PD-008].

1.3 Questions

- 1.3.1 This RIES contains four questions for the applicant, South Norfolk District Council and Essex Wildlife Trust, which are drafted in **blue, bold text**.

- 1.3.2 The responses to the questions posed within the RIES and comments received on it will be of great value to the ExA in understanding IPs' positions on Habitats Regulations matters. It is stressed that responses to other matters discussed in the RIES are equally welcomed. In responding to the questions, please refer to the ID number.

- 1.3.3 Comments on the RIES are timetabled for D7 (21 July 2026).

2 LIKELY SIGNIFICANT EFFECTS

2.0 European sites considered

- 2.0.1 The proposed development is not connected with or necessary to the management for nature conservation of any European site.
- 2.0.2 Section 2.7 of the HRA Report [APP-082] sets out the applicant's approach to the HRA.
- 2.0.3 Due to the size of the proposed development, the HRA Report [APP-082] broke the screening into two phases; 'pre-screening' and 'detailed screening'.
- 2.0.4 The pre-screening phase identified European sites within the study area. Those sites which are located in the study area but do not have a correlation with identified Zone of Influences (Zols) were scoped out from further assessment.
- 2.0.5 The detailed screening, focused on European sites which overlap with a Zol and where there is potential for likely significant effects (LSE) due to a pathway for effect which had been discussed with Natural England.
- 2.0.6 28 European sites within the UK National Site Network were included within the pre-screening assessment. These are listed in Table 2.4 of the HRA Report and are detailed in Table 2.1 below.

Table 2.1: European sites in the UK National Site Network identified in the applicant's HRA Report [APP-082]

Name of European site	Distance from proposed development (km)	Progressed to detailed screening assessment?
Norfolk Valley Fens SAC	0.3 km south-east	Yes
Thames Estuary and Marshes Ramsar site	1.8 km south-east	Yes
Thames Estuary and Marshes SPA	1.8 km south-east	Yes
Stour and Orwell Estuaries Ramsar site	3.1 km east	Yes
Stour and Orwell Estuaries SPA	3.1 km east	Yes
Colne Estuary (Mid-Essex Coast Phase 2) Ramsar site	7.3 km south-east	No
Colne Estuary (Mid-Essex Coast Phase 2) SPA	7.3 km south-east	No
Abberton Reservoir Ramsar site	7.6 km south-east	No
Abberton Reservoir SPA	7.6 km south-east	No
Hamford Water Ramsar site	7.9 km east	No

Name of European site	Distance from proposed development (km)	Progressed to detailed screening assessment?
Hamford Water SPA	7.9 km east	No
Broadland Ramsar site	8.9 km north-east	No
Broadland SPA	8.9 km north-east	No
Breckland SPA	9.7 km west	No
Blackwater Estuary (Mid-Essex Coast Phase 4) Ramsar site	11 km south-east	No
Blackwater Estuary (Mid-Essex Coast Phase 4) SPA	11 km south-east	No
Benfleet and Southend Marshes Ramsar site	11.7 km east	No
Benfleet and Southend Marshes SPA	11.7 km east	No
Crouch and Roach Estuaries (Mid-Essex Coast Phase 3) Ramsar site	12.2 km east	No
Crouch and Roach Estuaries (Mid-Essex Coast Phase 3) SPA	12.2 km east	No
Medway Estuary and Marshes Ramsar site	12.6 km south-east	No
Medway Estuary and Marshes SPA	12.6 km south-east	No
Deben Estuary Ramsar site	13.8 km east	No
Deben Estuary SPA	13.8 km east	No
Outer Thames Estuary SPA (marine)	13.8 km east	No
Dengie (Mid Essex Coast Phase 1) Ramsar site	17.7 km east	No
Dengie (Mid Essex Coast Phase 1) SPA	17.7 km east	No
Sandlings SPA	17.9 km east	No

2.0.7 Figure 1 of the HRA Report [APP-082] identifies the locations of the 28 European sites identified within 20km of the proposed development.

2.0.8 The detailed screening stage followed the pre-screening and identified that 23 of the 28 European sites are located outside of the identified Zol and confirmed there would be no impact pathways, these European sites are listed

in paragraph 2.8.2 of the HRA Report [APP-082] and identified above in Table 2.1.

- 2.0.9 The detailed screening assessment [APP-082] identified five European sites within the UK national site network (NSN), as listed in paragraph 2.8.3 of the HRA Report and identified in Table 2.1 above. The European sites were identified due to being located in relevant ZOI and therefore having potential for receptor specific impact pathways.
- 2.0.10 No additional UK European sites have been identified by IPs for inclusion within the assessment in the examination to date.
- 2.0.11 Appendix B of the HRA Report [APP-082] provides a copy of a letter from NE, confirming that it considers all relevant European sites and or European site features that could be affected by the project have been identified by the applicant.

2.1 Potential impact pathways

- 2.1.1 The HRA Report [APP-082] assessed the potential impacts during construction and operation and maintenance; it did not assess impacts during the decommissioning phase. As it is considered by the applicant that the proposed development would continue for as long as there is a business case for doing so. Furthermore, the HRA Report explained that if decommissioning of the pylons was required, this could be managed through a separate consenting procedure which would include a HRA screening which would take into account the baseline conditions at that time.
- 2.1.2 Section 2 of the HRA Report [APP-082] detailed the potential likely significant effect impact pathways for consideration in the assessment, along with the potential geographical extent of effects. Tables 2.5 to 2.9 of the HRA Report lists the sites and qualifying features and the impact pathways which could affect them.
- 2.1.3 No additional impact pathways have been identified by IPs for inclusion within the assessment in the examination to date.

2.2 In-combination effects

- 2.2.1 Section 2.8.13 of the HRA Report [APP-082] detailed the applicant's approach to assessing in-combination effects. The projects included in the in-combination assessment are detailed in section 3.4 of the HRA Report [APP-082]. The following nine projects were identified:
 - Bramford to Twinstead
 - Five Estuaries Offshore Wind Farm
 - North Falls Offshore Wind Farm
 - A12 Chelmsford to A120 Widening Project
 - East Anglia Three
 - Lower Thames Crossing

- Thurrock Flexible Generation Plant
- Tilbury to Grain and Tilbury to Kingsnorth (TRKE)
- Tilbury 3.

2.2.2 The applicant's Report on Interrelationship with Other Infrastructure Projects [REP-296] included the following Nationally Significant Infrastructure Projects (NSIPs) which were listed in Annex F of the Rule 6 letter [PD-009] and which had not been included in the HRA Report:

- Sheringham and Dudgeon Extension Projects
- Longfield Solar Farm
- Tilbury 2
- Rivenhall Integrated Waste Management Facility and Energy Centre
- Tarchon Interconnector

2.2.3 Section 3.3 of [REP4-296] also discusses 32 other projects which were included within the assessment but are not NSIPs.

RIES Q1 – to the applicant – please confirm how potential impacts on European sites have been taken into consideration as a result of the additional sites identified in the Report on Interrelationship with Other Infrastructure Projects [REP4-296].

2.3 The applicant's assessment

2.3.1 The applicant's conclusions in respect of screening are presented in section 2.9 of the HRA Report [APP-082].

Sites for which the applicant concluded no LSE on all qualifying features

2.3.2 The applicant concluded that the proposed development would not be likely to give rise to significant effects, either alone or in-combination with other projects or plans, on all qualifying features of the European sites identified in Table 2.1 of this RIES.

2.3.3 Thames Estuary and Marshes SPA and Thames Estuary and Marshes Ramsar site were progressed to the detailed screening stage by the applicant. However, following the detailed screening, no LSE were identified for these two European sites.

2.3.4 Natural England confirmed it agreed with the applicant's conclusion of no LSEs in respect of the above European sites [REP1-034].

Sites for which the applicant concluded LSE on some or all qualifying features

2.3.5 The applicant concluded that the proposed development would be likely to give rise to significant effects, either alone or in-combination with other projects or plans, on one or more of the qualifying features of:

- Norfolk Valley Fens SAC
- Stour and Orwell Estuaries SPA
- Stour and Orwell Estuaries Ramsar site

2.3.6 The qualifying features and LSE pathways screened in by the applicant are detailed in Tables 2.5 to 2.9 (screening matrices) [APP-082] and set out in annex 1, Table A1 of this RIES.

2.3.7 No matters have been raised in the examination to date in relation to the applicant's screening assessment.

3 ADVERSE EFFECTS ON INTEGRITY

3.0 Conservation Objectives

- 3.0.1 The conservation objectives for all of the European sites for which LSE were identified by the applicant at the point of the DCO application were included within the HRA Report [APP-082]

RIES Q2 the applicant is requested to provide information regarding the condition of Norfolk Valley Fens SAC, Stour and Orwell Estuaries SPA and Stour and Orwell Estuaries Ramsar site, including if the site is in unfavourable condition (to include unfavourable recovering). Outline how any necessary mitigation measures would contribute to improving the condition of these sites.

3.1 The applicant's assessment

- 3.1.1 The three European sites and their qualifying features for which LSE were identified were further assessed by the applicant to determine if they could be subject to adverse effects on integrity (AEoI) from the proposed development, either alone or in-combination. As set out in paragraph 2.4.5, these sites are:

- Norfolk Valley Fens SAC
- Stour and Orwell Estuaries SPA
- Stour and Orwell Estuaries Ramsar site

- 3.1.2 The outcomes of the applicant's assessment of effects on integrity are summarised in section 3 of the HRA Report [APP-082].

Mitigation measures

- 3.1.3 The applicant's HRA Report identified mitigation measures in Section 3 [APP-082]. These were taken into account in the applicant's assessment of effects on integrity.

Sites for which the applicant concluded no AEoI

- 3.1.4 The applicant concluded that the proposed development would not adversely affect the integrity of any of the European sites and features assessed, either alone or in-combination with other projects or plans.

3.2 Examination matters

- 3.2.1 In its relevant representation, South Norfolk District Council [RR-3417] raised concern regarding indirect impacts to the Norfolk Valley Fens SAC as a result of water degradation from pollution, changes in ground water, and deposition of dust potentially arising from construction activities. This matter was not raised again by South Norfolk District Council either in the Statement of Common Ground or other submissions.

- 3.2.2 The applicant responded [REP4-299] that the Statement of Common Ground with Natural England [REP4-081], confirmed that Natural England accepted

that with mitigation measures in place to protect water quality, there would be no AEol on Norfolk Valley Fens SAC.

- 3.2.3 Mitigation measures to minimise pollution incidents are detailed in the outline Code of Construction Practice [REP5-139] which is secured through Requirement 4 of the draft DCO [REP5-060].

RIES Q3 – to South Norfolk District Council. Can South Norfolk District Council confirm it is content with the position of the applicant and NE that there will be no adverse effects on the integrity of the Norfolk Valley Fens SAC? If not, please explain your outstanding concerns. If South Norfolk District Council has remaining concerns, please clearly set out specific actions it considers should be undertaken by the applicant to resolve its concerns.

- 3.2.4 This matter was not raised again during the examination.
- 3.2.5 Essex Wildlife Trust in its relevant representation [RR-1090] raised concerns regarding the adequacy of the HRA relating to functionally linked land (FLL) for qualifying features of the Stour and Orwell Estuaries SPA and the Thames Estuary and Marshes SPA. The applicant summarised its approach to the assessment of FLL and relevant mitigation measures [REP1-132]. The applicant confirmed that the HRA had concluded no adverse effects on the integrity of the Stour and Orwell Estuaries SPA and Thames Estuary and Marshes SPA, and this was agreed with NE [RR-2658].
- 3.2.6 The SoCG with Essex Wildlife Trust (EWT) [REP4-093] stated that this matter was likely to be resolved by D7, following further engagement.

RIES Q4 to EWT – please confirm if further engagement has taken place and if the concerns of EWT regarding the approach to the assessment of FLL for the Stour and Orwell Estuaries SPA and the Thames Estuary and Marshes SPA will be resolved by D7. If EWT has remaining concerns, please clearly set out specific actions it considers should be undertaken by the applicant to resolve its concerns.

ANNEX 1: EXAMINING AUTHORITY'S UNDERSTANDING OF POSITION AT POINT OF PUBLICATION OF REPORT ON THE IMPLICATIONS FOR EUROPEAN SITES

The table in this annex summarises the ExA's understanding of the applicant's screening exercise and assessment of effects on integrity, and agreement with Natural England at time of publication of this RIES.

Note that the conclusions recorded in the table below applies to impacts from the proposed development alone and in-combination, unless otherwise stated.

Table A1: Applicant's conclusion on likely significant effects and adverse effects on integrity and the position of Natural England

Site and feature	Potential impact (Construction (C) and operation (O))	Likely significant effects (LSE)?		Adverse effects on integrity (AEOI)?	
		Applicant's conclusion (alone or in- combination)	Agreement with Natural England?	Applicant's conclusion (alone or in- combination)	Agreement with Natural England?
Norfolk Valley Fens SAC					
- Northern Atlantic wet heaths with cross-leaved heath - European dry heaths - Semi-natural dry grasslands and scrubland facies: on calcareous substrates - Molinia meadows on calcareous, peaty or clayey-silt-laden soils - Calcareous fens with Great fen-sedge and species of the Caricion davallianae - Alkaline fens - Alluvial forests with Common Alder and Common Ash - Desmoulin's Whorl snail - Narrow-mouthed whorl snail	Changes in hydrology (O)	No LSE	Yes	No AEOI	Yes
	Changes in hydrology (C)	LSE	Yes	No AEOI	Yes

Stour and Orwell Estuaries SPA					
• Pied avocet • Northern pintail • Brent goose • Dunlin • Red knot • Black-tailed godwit • Grey plover • Common redshank	Permanent/temporary land loss (C and O) Habitat fragmentation (C and O) Reduction in species density (C and O) Disturbance (C and O) Changes in hydrology (O) Changes in air quality (C and O)	No LSE	Yes	No AEOI	Yes
	Changes in hydrology (C)	LSE	Yes	No AEOI	Yes
Stour and Orwell Estuaries Ramsar site					
• Seven nationally scarce plants; stiff saltmarsh grass, small cord grass, perennial glasswort, lax-flowered sea lavender, eelgrasses (<i>zostera angustifolia</i>, <i>Z. marina</i> and <i>Z. nolte</i>) • Five British Red Data Book invertebrates: muscid fly, horsefly, two spiders (<i>Arctosa fulvolineata</i> and <i>Baryphema duffeyi</i>) and swollen spire snail.	Permanent/temporary land loss (C and O) Habitat fragmentation (C and O) Reduction in species density (C and O) Disturbance (C and O) Changes in hydrology (O) Changes in air quality (C and O)	No LSE	Yes	No AEOI	Yes

	Change in hydrology (C)	LSE	Yes	No AEOI	Yes
Assemblages of international importance: species with peak counts in winter	Permanent/temporary land loss (O) Habitat fragmentation (O) Reduction in species density (C and O) Disturbance (O) Changes in hydrology (O) Changes in air quality (O)	No LSE	Yes	No AEOI	Yes
	Permanent/temporary land loss (C) Habitat fragmentation (C) Disturbance (C) Changes in hydrology (C) Changes in air quality (C)	LSE	Yes	No AEOI	Yes
• Common redshank • Dark bellied brent goose • Northern pintail • Grey plover • Red knot • Dunlin	Permanent/temporary land loss (C and O) Habitat fragmentation (C and O) Reduction in species density (C and O) Disturbance (C and O) Changes in hydrology (C)	No LSE	Yes	No AEOI	Yes

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• Black-tailed godwit	Changes in air quality (C and O)				
	Change in hydrology (C)	LSE	Yes	No AEOI	Yes