



Suffolk Wildlife Trust Comments on Biodiversity Net Gain and Ecology Working Group Submitted at Deadline 7 (In Reference to Rule 17 Letter)

Deadline: July 2026

Planning Inspectorate Ref: EN020027

Suffolk Wildlife Trust Registration Identification Ref: [REDACTED]

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21st July 2026

RE: Deadline 7 | Suffolk Wildlife Trust Comments on Biodiversity Net Gain and Ecology Working Group (In Reference to Rule 17 Letter)

Dear Planning Inspector,

I write with reference to the Rule 17 letter dated 14th July 2026 requesting further information relating to the proposed Norwich to Tilbury Project (EN020027). Suffolk Wildlife Trust wish to offer detailed comment in response to the following questions directed to us:

1.1 Requirement 11: Biodiversity Net Gain

1.5 Outline Landscape and Ecological Management Plan and ecological working group

Please find our detailed comments in response to these questions on the following pages and do not hesitate to contact us for further information.

Yours sincerely,

Rupert Masefield
Head of Planning & Advocacy


Planning & Advocacy Officer

Question 1.1 Requirement 11: Biodiversity Net Gain

At deadline 6 the applicant submitted a revised draft Development Consent Order (DCO) [REP6 030]. In Schedule 3 of [REP6-030] a new requirement 11 on biodiversity net gain has been included. Comments are sought on this additional requirement, including any alterations to any of the wording that you would recommend.

Suffolk Wildlife Trust comments:

We note that elsewhere in the draft DCO (requirement 8. Retention and removal of trees, woodland and hedgerows; and requirement 9. Reinstatement planting plan) wording is included to the effect that:

- a) No stage of the authorised development may commence/be brought into operational use until, for that stage, the relevant plan has been submitted to **and approved by** the relevant planning authority.
- b) the discharge of these requirements must be in accordance with the landscape and ecological management plan.

While requirement 11. Biodiversity Net Gain requires the submission of biodiversity net gain assessments and a biodiversity offsetting scheme to the relevant planning authority at appropriate points in the development, it does not require the approval of said assessments and schemes by those planning authorities.

Further, we note that the Biodiversity Net Gain Report (Final Issue A) and Outline Landscape and Ecological Management Plan (Final Issue F) both contain important information regarding the Applicant's approach to delivering a minimum 10% Biodiversity Net Gain.

For instance:

Biodiversity Net Gain Report (Final Issue A) (BNG Report)

- 6.1.2 *Biodiversity is not physically bound by Local Planning Authority boundaries and therefore a holistic approach is proposed for any off-site habitat creation and/or enhancements, with the aim to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex).*
- 6.1.3 *Off-site locations chosen to deliver the necessary off-site biodiversity units will be chosen based on National Grid's carefully considered selection criteria. The selection criteria will take into account (amongst other criteria), the habitat type and condition required, the location in proximity to the Order Limits, the delivery partner's credibility and proven experience in delivery, cost per unit, timeframes and will also consider sites that provide added value in the form of additional societal and environmental benefits.*

Outline Landscape and Ecological Management Plan (Final Issue F) (OLEMP)

- 1.4.3 *Within the RIIO-T3 Business Plan (2026-2031), National Grid has made commitments to the use of 10% BNG as a 'catalyst to deliver wider environmental and societal benefits, working with strategic partners and communities to deliver large-scale actions supporting nature recovery strategies' and to the use of 'BNG is our chosen route to working with strategic partners to*

facilitate investment in nature that will deliver long-term sustainable benefits for biodiversity and communities’.

We welcome the Applicant’s commitment in the BNG Report and OLEMP to delivering any off-site BNG measures required to achieve at least a 10% BNG for the scheme in locations where habitat creation and enhancement informed by the relevant LNRS will leave a biodiversity legacy in each of the three counties crossed by the project. This will be essential for achieving National Grid’s aim of using BNG as a ‘catalyst to deliver wider environmental and societal benefits’ and delivering ‘long-term sustainable benefits for biodiversity and communities’.

However, the Biodiversity Net Gain requirement in Schedule 3 of the draft DCO does not refer to either the Biodiversity Net Gain Report or the (Outline) LEMP as containing information relevant to the discharge of this requirement.

To bring requirement 11. Biodiversity Net Gain in line with requirements 8. And 9. We request the requirement be amended to include **additional wording** as follows:

11. Biodiversity Net Gain

*(1) Prior to the commencement of the authorised development, the interim biodiversity net gain assessment must be submitted to **and approved by** each relevant planning authority. 112*

*(2) Within six months of the date on which the construction period ends for the authorised development, a final biodiversity net gain assessment must be submitted to **and approved by** each relevant planning authority.*

*(3) In the event that the final biodiversity net gain assessment demonstrates that less than 10% biodiversity net gain has been achieved overall across the Order land following construction of the authorised development, a biodiversity offsetting scheme shall be submitted to **and approved by** each relevant planning authority.*

(4) The biodiversity offsetting scheme will be implemented by the undertaker acquiring biodiversity units from third party landowners who have entered into legal agreements with the relevant planning authority or responsible body (as applicable) to secure their land for the purposes of biodiversity net gain for a minimum period of 30 years and will identify proposed timings for the securing of offsite biodiversity enhancements.

(5) The biodiversity offsetting scheme submitted under sub-paragraph (4) must be in accordance with the outline landscape and ecological management plan (or the final landscape and ecological management plan if approved pursuant to requirement 4) and with the Biodiversity Net Gain Report (Final Issue A).

(6) Within two months of completion of the biodiversity offsetting scheme, the undertaker must submit a report confirming completion to the relevant planning authority.

Finally, we seek clarification regarding this last sub-paragraph ((6) in the renumbered sub-paragraphs above) as to the specific meaning of ‘completion of the biodiversity offsetting scheme’ and when completion will be judged to have been achieved. Will this be when the final purchase of the required offsite Biodiversity Units has been completed?

Question 1.5

Outline Landscape and Ecological Management Plan and ecological working group

To Suffolk Wildlife Trust, Suffolk CC and Essex CC:

- c) Advise whether you are satisfied in regard to the applicant's wording, as set out in the applicant's outline LEMP [REP6-084], which it advises broadly aligns with Suffolk Wildlife Trust's suggested text, as contained in its deadline 1 submission [REP1-278] at paragraph 2.3.
- d) Provide examples of the types of landscape matters that you consider should fall within the remit of this working group.

Suffolk Wildlife Trust comments:

Suffolk Wildlife Trust continue to support the wording of a requirement for a Landscape and Ecology Working Group (LEWG) proposed by Suffolk CC [[REP5-270](#)].

We note that the draft DCO does not include a requirement in Schedule 3 for the establishment of the LEWG and this is instead left to the LEMP and requirement 4. Construction Management Plans to ensure the scheme is delivered in accordance with the LEMP.

We are uncertain whether a requirement needs to be added to Schedule 3 of the DCO to secure the establishment of the LEWG in accordance with the wording proposed by SCC, but if this is necessary, the draft DCO needs to be amended to include such a requirement.