

AENC-NG-CNS-REP-0361

Norwich to Tilbury

Volume 8: Examination Documents

Document: 8.3.91 Signed Statement of Common Ground - Aura
Power (Marsh Lane Solar Farm) - Clean Version

Final Issue B

July 2026

Planning Inspectorate Reference: EN020027

nationalgrid

Revision History

Version	Date	Submitted at
A	10 June 2026	Deadline 5
B	21 July 2026	Deadline 7

Aura Power (Marsh Lane Solar Farm) Statement of Common Ground

1. Purpose of the Statement of Common Ground

This Statement of Common Ground (SoCG) has been prepared to confirm to the Examining Authority where agreement has been reached and where agreement has not been reached between National Grid and Aura Power Developments Ltd (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.

2. Parties to the SoCG

This SoCG is between National Grid (the Applicant) and Aura Power.

3. Summary of Matters

This final SoCG deals with 14 matters in total, of which 4 are agreed and 10 are under discussion.

Discussions between the Applicant and Aura Power necessarily will continue during detailed design, and for some matters into construction, including on the following matters:

- Final design of the Project, e.g. the haul road alignment and its interface with Aura Power's wildflower planting and skylark mitigation, the pulling zone, the sustainable drainage system and drainage strategy
- Interface between the Project's permanent access and Aura Power's underground cabling
- Interface between the Project and Aura Power's planting / mitigation more generally
- Extent to which temporary removal of solar panels will be required
- Method of stringing the overhead line
- Compensation to Aura Power

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 committed 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.

6. 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 Dates:
 - 30 June 2023
 - 17 January 2025
 - 28 April 2026
 - 25 June 2026
 - 1 July 2026
- The parties continued to engage through regular email correspondence in relation to the matters described in this Statement of Common Ground.

7. Matters Agreed

ID	Issue	Agreement reached	Date agreed
7.1	Continued engagement and collaboration to minimise impacts	The parties have agreed to continue to engage to co-ordinate, manage interfaces and mitigate impacts.	July 2026
7.2	Heads of terms leading to a legal agreement	The parties agree to collaboratively develop heads of terms as the basis of a legal agreement. The legal agreement will secure the commitments and arrangements needed to successfully manage interfaces.	July 2026
7.3	Haul road width and dust mitigation measures	The haul road will comprise a 4m running width, locally widened at passing places where required. In addition to the running width, temporary working areas will be required for construction, including fencing, subsoil storage, and drainage swales. The Applicant confirms that both the temporary and permanent working widths will be kept to the minimum reasonably practicable and will be designed to limit impacts on surrounding land uses. In response to stakeholder comments, the Applicant will implement appropriate dust suppression measures during construction. These are expected to include, but are not limited to, water suppression, speed restrictions, and regular monitoring of surface conditions to minimise dust generation. Particular consideration will be given to nearby sensitive receptors, including solar panels and associated infrastructure, to avoid adverse effects. The Applicant will continue to engage with Aura Power to agree the detailed design, ensuring a balanced approach that addresses construction requirements, environmental constraints, and the operational needs of adjacent land uses.	July 2026

ID	Issue	Agreement reached	Date agreed
7.4	Permanent access rights	The Applicant acknowledges Aura Power's concerns regarding permanent access crossing its underground cabling. It is agreed that such access does not comprise a constructed road, but instead a post-construction maintenance route to the pylons, intended for access on foot and, where necessary, by light vehicles (typically a van). The Parties agree to work collaboratively to mitigate impacts between their respective infrastructure, particularly in relation to the sequencing of construction. It is agreed that permanent rights of access to pylons RG89, RG90 and RG91 will cross Aura Power's underground cable route, which is to be secured via a legal easement from the solar site to the point of grid connection at Diss BSP. Where the sequencing of construction gives rise to an interaction between the Project's access route and Aura Power's underground cable, it is agreed that such interaction will be managed having regard to the non-constructed, maintenance-only nature of the access route. Where Aura Power's cable is constructed first, appropriate safe construction practices will apply and the Project will fund reasonable and proportionate measures to protect the cable at crossing points (such as localised ducting), where demonstrated to be necessary, with compensation payable where damage caused by the Project materially affects the solar farm's ability to export electricity or cause crop loss. Where the Project is constructed first, the non-constructed, maintenance-only nature of the access route will be taken into account in considering any interaction with Aura Power's proposed cable installation, with compensation payable where the Project materially affects the Solar Project, including (but not limited to) its installation or energisation. All compensation claims to be judged in accordance with the Compensation Code.	July 2026

8. Matters Under Discussion

ID	Issue	National Grid position	Aura Power position	Relevant documentation
8.1	Haul road design development	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. The Applicant will explore opportunities to further refine the alignment in the area, including consideration of an alternative route crossing the hedgerow closer to Millway Lane and into the adjacent farm area, subject to sufficient available space and compatibility with other land uses. This review will take into account potential benefits in reducing impacts on proposed solar infrastructure, planting, and ecological mitigation areas. However, beyond any potential localised adjustment, the alignment remains subject to land availability, environmental constraints, and access requirements and is therefore expected to remain broadly as proposed at this stage.	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 amended. As the Project's DCO application is still in preparation, National Grid has a clear duty under Paragraph 8 of the Department for Communities and Local Government Guidance 'Planning Act 2008: Guidance related to procedures for compulsory acquisition' to demonstrate that all	

ID	Issue	National Grid position	Aura Power position	Relevant documentation
			reasonable alternatives have been explored. National Grid should relocate the haul road to avoid negatively impacting this committed green energy asset.	
8.2	Skylark mitigation	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 line with the statutory compensation code, ensuring affected parties are appropriately compensated for impacts experienced. The Applicant will explore the potential to make suitable land within its control available to accommodate skylark mitigation, where reasonably practicable, with the aim of reducing the need for relocation and associated impacts.	The local authority approved the 'Retained Agricultural Land with Skylark Mitigation' and 'Wildflower Planting with Skylark 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.	
8.3	Compensation	The Applicant will welcome evidence based compensation claims for consideration in line with the Compensation Code. Such matters would be assessed on a case-by-case basis, in accordance with the Planning Act 2008 and the statutory Compensation Code and are not matters to be determined through the Examination of the DCO.	Aura Power expects full compensation if 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	

ID	Issue	National Grid position	Aura Power position	Relevant documentation
			and its cable route due to the Project or rights exercised by National Grid. 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. 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.	
8.4	Land ownership	Regarding the potential transfer of land from SK174841 to SK176181, the Applicant notes that discussions are ongoing and may not be concluded prior to construction. The haul road alignment will therefore be finalised based on registered ownership but could potentially be changed subsequently. The Applicant confirms that the potential to route the haul road further north, including crossing into	The haul road is partly located within land owned by the adjacent title SK174841, part of which is subject to a claim for adverse possession by Landowner of title SK176181 as it has been continuously farmed by the Landowner for at least 10 years or more and is a correction of a long standing Land Registry boundary mapping error, at which point Aura Power are legally obliged under	

ID	Issue	National Grid position	Aura Power position	Relevant documentation
		adjacent title SK174841, is being considered as part of the ongoing haul road design review. The Applicant will continue to engage with Aura Power as detailed design progresses.	the terms of our Option for Lease agreement with the Landowner to include the reclaimed land within the Solar Project. DWG files provided by Aura Power to National Grid on 25 June 2026 demonstrating the consented solar layout and the future solar layout once the adverse possession claim has been approved by Land Registry. The current alignment could constrain this future use and may require relocation or redesign. Should these changes take effect then the existing haul road alignment will affect a larger amount of Aura Power's solar project.	
8.5	Pulling zone	The Applicant confirms its aim is to avoid using the part of the pulling zone that clashes with the Aura Power development. This is the area currently shown at RG91 (yellow, horizontal stripe, hatched, bowtie shaped zone in Image 7.1). It remains indicated on the plans at this stage as part of the preliminary design; however, to repeat, the aim is for it not to be utilised. The Applicant's design team is currently working on an updated bowtie drawing and this will be available by September 2026.	In the event the pulling area were to impact the Aura Power development, Aura Power would expect to be appropriately compensated for any losses arising.	

ID	Issue	National Grid position	Aura Power position	Relevant documentation
8.6	Sustainable Drainage System (SuDS)	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. 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. Further detail will be provided as the drainage design is progressed in accordance with 8.2 Drainage Strategy DCO [REP4-186]. With reference to the Skylark Mitigation areas, please see the Applicant's response in ID 8.2 above.	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. 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. Should the permanent SuDS entail that the Landowner cannot plant the demarked SuDS area with arable crops, this would remove area that could host skylark plots,	8.2 Drainage Strategy DCO [REP4-186]

ID	Issue	National Grid position	Aura Power position	Relevant documentation
			thereby increasing the risk that the requisite number of skylark plots that are legally obliged to be provided (16 plots in approx. 8ha) via the Section 106 agreement might not be deemed viable by the local authority.	
8.7	Haul road impact on solar panels	The Applicant acknowledges that temporary removal of panels may be required to facilitate haul road construction activities. The haul road will be formed along the eastern side of the field. These impacts will be temporary only but longer in duration than stringing activities (almost full duration of Project construction). All affected areas will be reinstated following completion, allowing for the installation (or reinstallation) of solar panels thereafter. The Applicant is currently evaluating the design of the Haul Road and with the possibility of moving the road east of the hedge. The Applicant will confirm when this information can be shared. Where impacts are not mitigated and the temporary removal of solar apparatus is required to enable construction of the Project, the Applicant will welcome discussions with Aura Power to agree the costs associated with those works in accordance with the compensation code. In accordance with the compensation code this may	In the event the haul road were to impact the Aura Power development, Aura Power would expect to be appropriately compensated for any losses arising.	

ID	Issue	National Grid position	Aura Power position	Relevant documentation
		include an undertaking to cover reasonable associated costs, such as professional fees and project management costs, where required.		
8.8	Overhead line impact on solar panels	The Applicant confirms that PV solar panels can be installed under the overhead line in the long term. The Applicant acknowledges that temporary removal of panels maybe be required to facilitate stringing construction activities. These impacts will be temporary only, and all affected areas will be reinstated following completion, allowing for the installation (or reinstallation) of solar panels thereafter. The method of stringing is currently being assessed. The three main options are ground clear, scaffold or innovative (minimum site access requirement). The Applicant acknowledges Aura Power's preference to avoid the removal of any PV panels, and removal would therefore be treated as a last resort, where alternative methods are not reasonably practicable. The ground clear method would require establishment of a temporary working corridor beneath the overhead line (and approximately 10m either side) to allow for safe stringing operations.	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 or constructed by Aura Power prior to the Project's construction that would not subsequently be able to be installed due to the Project.	

ID	Issue	National Grid position	Aura Power position	Relevant documentation
		Where impacts are not mitigated and the temporary removal of solar apparatus is required to enable construction of the Project, the Applicant will welcome discussions with Aura Power to agree the costs associated with those works in accordance with the compensation code. In accordance with the compensation code this may include an undertaking to cover reasonable associated costs, such as professional fees and project management costs, where required.		
8.9	Book of Reference	The Applicant acknowledges Aura Power's comments regarding the Book of Reference in respect of their SPV, Haedus Solar Limited. The Project's Book of Reference has been updated at Deadline 6 of the examination. The Applicant responds to Aura Power's comments on the Book of Reference as follows: Plot B-1/24: The existing entry for an option agreement under title SK113952 will be changed to a Category 2 interest in this parcel. Plots B-1/34, B-1/36, B-1/40 and B-1/44: The option agreement will be added to these parcels. Plot B-1/42: Falls under a different freehold SK174841 for which there is no Haedus Solar option agreement shown on the title. An option	The Project has not accurately captured all of Aura Power's interests in land affected by this DCO application. 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. 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.	4.3 Book of Reference [Revision E]

ID	Issue	National Grid position	Aura Power position	Relevant documentation
		agreement unrelated to Haedus Solar exists on this title. Therefore, no change has been made for this plot. Plots B-1/25, B-1/32 and B-1/37: Unregistered public adopted highway, and, whilst the freehold is presumed to extend via the subsoil below the road to its centre, it is unlikely that the option would extend beyond the edge of the road parcel. Therefore, no change has been made for these plots.	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.	
8.10	Impact on planting that prevents glint and glare caused by existing OHL being undergrounded	The Applicant acknowledges Aura Power's obligations under Condition 11 of planning consent DC/23/05426, including the requirement for planting to mitigate glint and glare along the southern boundary of the site. The Applicant will explore opportunities to further refine the alignment in this area, including consideration of alternative routing where reasonably practicable, to avoid or minimise impacts on proposed planting associated with this condition. This review will take into account the benefits of reducing effects on solar infrastructure, mitigation planting, and compliance with planning requirements. However, beyond any potential localised adjustments, the alignment remains subject to land	Condition 11 of Aura Power's aforementioned planning consent (DC/23/05426) requires planting in several locations, including along the southern boundary of the site along Lion Road in order to prevent glint and glare to road users of Lion Road. This takes the form of a new hedgerow with scattered trees and is indicated on Aura Power's consented layout plan. If National Grid's proposed compulsory acquisition of rights to replace the existing pole and OHL (we assume) with an underground cable on land parcels 1/45 and 1/47 cause any destruction of this new planting Aura Power are obliged to undertake, then full costs and liability rest with National Grid to compensate	

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ID	Issue	National Grid position	Aura Power position	Relevant documentation
		availability, environmental constraints, and access requirements, and is therefore expected to remain broadly as proposed at this stage. Where impacts on such planting cannot be reasonably avoided, these will be addressed in accordance with the statutory compensation code.	Aura Power for reinstating, and compensating for and damage suffered by Aura Power as a result of not complying with local authority requirements or its planning consent.	

Figure 1 Interaction between Pylons RG91 to RG94 and Aura Power's proposed Solar Site and Underground Cable Route.

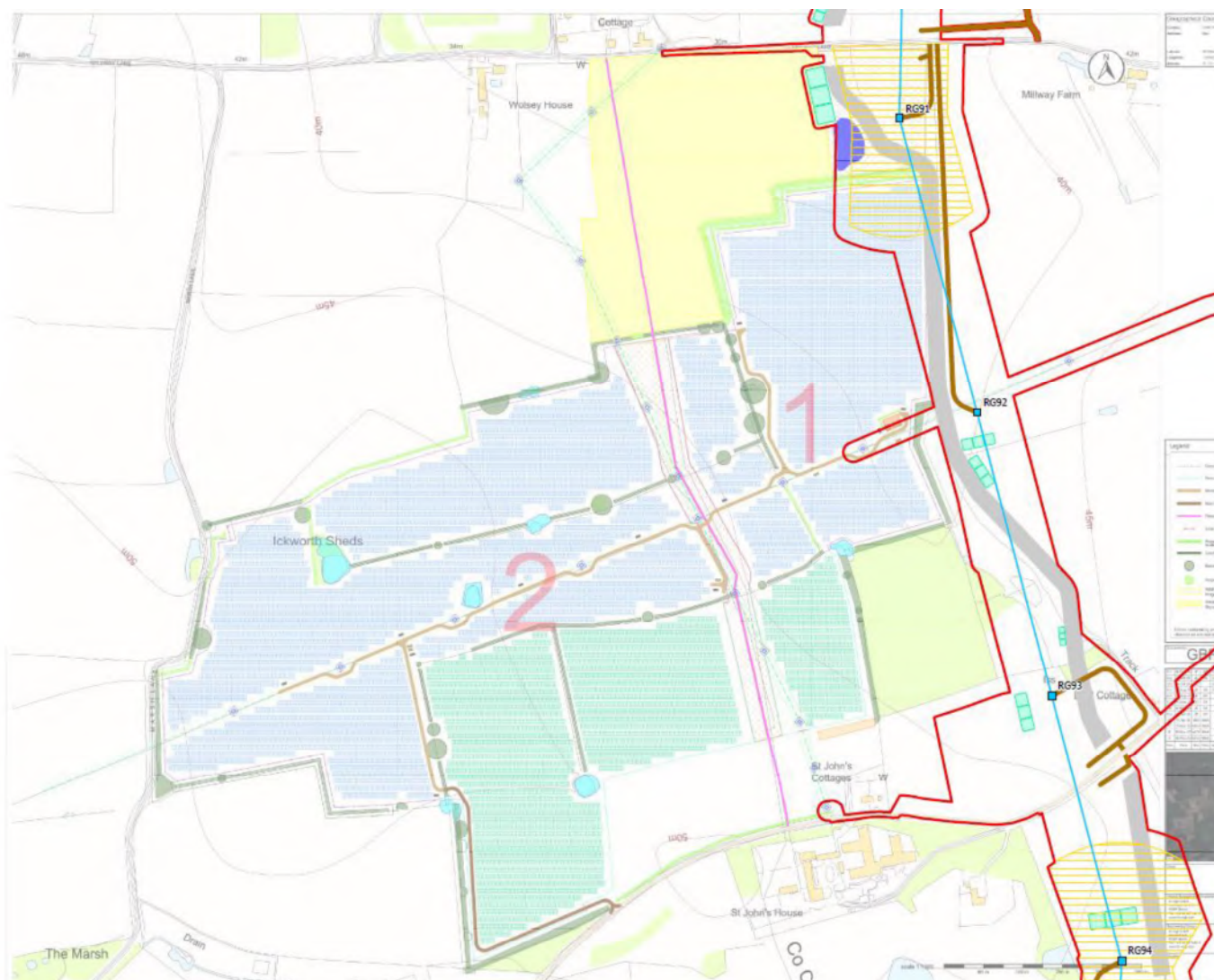
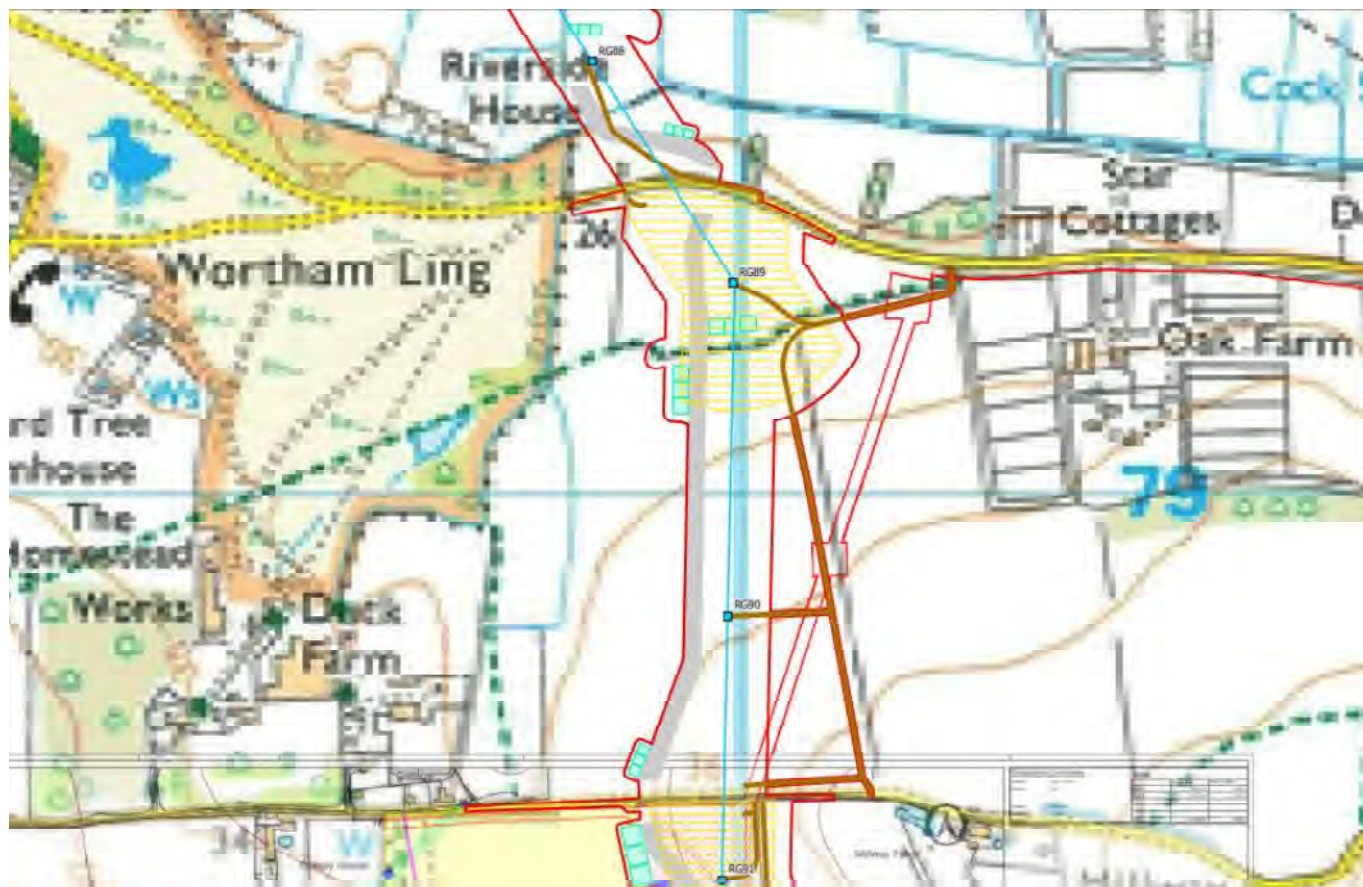


Figure 2 Interaction between Pylons RG89 to RG91 and Aura Power's proposed Solar Site and Underground Cable Route.



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9. Signatures

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

For National Grid

Name

[Redacted Signature]

Position: Project Director

Date: 07/07/2006

For Aura Power

Name:

[Redacted Signature]

Position: CEO

Date: 7/7/26

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