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Norwich to Tilbury

Volume 5: Reports and Statements

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Wildlife Trust - Clean Version

Final Issue D

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nationalgrid

Revision History

Version	Date	Submitted at
A	29 August 2025	DCO Application
B	26 February 2026	Deadline 1
C	12 May 2026	Deadline 4
D	21 July 2026	Deadline 7

Suffolk Wildlife Trust

Statement of Common Ground

1. Purpose of the Statement of Common Ground

This final Statement of Common Ground (SoCG) has been prepared to outline the areas of agreement and any remaining points of discussion between National Grid and Suffolk Wildlife Trust regarding potential ecological impacts in relation to the proposed Norwich to Tilbury Project (the Project).

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 agreed between National Grid and the Suffolk Wildlife Trust (the Stakeholder).

3. Background

3.1 Description of the Project/Development

The Project is a proposal by National Grid to upgrade the electricity transmission system in East Anglia between Norwich and Tilbury, comprising:

- A new 400 kilovolt (kV) electricity transmission connection of approximately 180 km overall length from Norwich Main Substation to Tilbury Substation via Bramford Substation, a new East Anglia Connection Node (EACN) Substation and a new Tilbury North Substation, including:
 - Approximately 159 km of new overhead line supported on approximately 509 pylons, either standard steel lattice pylons (approximately 50 m in height) or low height steel lattice pylons (approximately 40 m in height) and some of which would be gantries (typically up to 15 m in height) within proposed Cable Sealing End (CSE) compounds or existing or proposed substations.
 - Approximately 21 km of 400 kV underground cabling, some of which would be located through the Dedham Vale National Landscape (an Area of Outstanding Natural Beauty (AONB1)).
- Up to seven new CSE compounds (with permanent access) to connect the overhead lines to the underground cables.
- Modification works to connect into the existing Norwich Main Substation and a substation extension at the existing Bramford Substation.

- A new 400 kV substation on the Tendring Peninsula, referred to as the EACN Substation (with a new permanent access). This is proposed to be an Air Insulated Switchgear (AIS) substation.
- A new 400 kV substation to the south of Orsett Golf Course in Essex, referred to as the Tilbury North Substation (with a new permanent access). This is proposed to be a Gas Insulated Switchgear (GIS) substation.
- Modifications to the existing National Grid Electricity Transmission overhead lines to facilitate the connection of the existing network into the new Tilbury North Substation to provide connection to the Tilbury Substation.
- Ancillary and/or temporary works associated with the construction of the Project.

In addition, third party utilities diversions and/or modifications would be required to facilitate the construction of the Project. There would also be land required for environmental mitigation and BNG.

As well as the permanent infrastructure, land would also be required temporarily for construction activities including, for example, working areas for construction equipment and machinery, site offices, welfare, storage and temporary construction access.

The Project would be designed, constructed and operated in accordance with applicable health and safety legislation. The Project will need to comply with design safety standards including the Security and Quality of Supply Standard (SQSS), which sets out the criteria and methodology for planning and operating the National Electricity Transmission System (NETS). This informs a suite of National Grid policies and processes, which contain details on design standards required to be met when designing, constructing and operating assets such as those proposed for the Project.

The Project is a Nationally Significant Infrastructure Project (NSIP) and as such will require the grant of development consent by the making of a Development Consent Order (DCO) under the Planning Act 2008. The Act 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 consultations and one statutory consultation to inform its proposals, with further recent targeted consultations.

4. Stakeholder Interests

Suffolk Wildlife Trust supports the transition to renewable energy to mitigate the worst impacts of climate change, which threatens wildlife as well as people and recognise the need for new electricity transmission infrastructure to facilitate to renewable and low-carbon electricity generation and supply in the UK. It is vital though that new electricity transmission infrastructure to facilitate the decarbonisation of the energy sector does not compromise society's ability to address the equally important crisis of biodiversity loss or undermine the delivery of nature-based solutions to climate change. For Norwich to Tilbury this means in particular that:

- The crossing of the River Waveney Valley must not compromise the ability of the WaLOR project to deliver its planned nature recovery activities.

- Potential for significant impacts to important species within Dedham Vale National Landscape (notably hazel dormice and bats) must be adequately assessed and likely impacts avoided, mitigated, and compensated for in line with the mitigation hierarchy and following best practice to ensure no residual adverse impact and ideally provide significant net benefits to the species locally.

Suffolk Wildlife Trust's interests also include;

- Wider impacts as a result of hedgerow/ scrub/ woodland loss which could affect hazel dormice, bats (especially barbastelle), and farmland birds even if considered temporary.
- Impacts to several County Wildlife Sites, and the Rivers Gipping and Stour.
- Bird collision risk modelling.
- Potential for ecological enhancements to make a meaningful contribution to nature recovery.

Suffolk Wildlife Trust have raised concerns or comments on additional matters pertaining to biodiversity conservation within the development consent application following sight of the Environmental Statement and other documents. National Grid have reviewed and worked with Suffolk Wildlife Trust throughout the process of the development of this document.

Suffolk Wildlife Trust has engaged with National Grid and their ecological consultants regarding the Project during the pre-application process, resulting in changes to the scheme to avoid and reduce impacts to ecological receptors following our responses to pre-application consultations and further discussions with the Project team. Suffolk Wildlife Trust seek to continue this constructive engagement through the development consent process to minimise as far as possible any negative ecological impacts and optimise mitigation, compensation, and enhancement to deliver meaningful biodiversity and environmental gains.

The chronology of National Grid's engagement with Suffolk Wildlife Trust to date, and the evolution of the Project's design is summarised as follows:

- 2022
 - National Grid presented information on how the Project was evolving from the evaluation of strategic options to a preliminary preferred graduated swathe within which new infrastructure (pylons and underground cables) could be located as well as a proposed new substation site on the Tendring Peninsula, as described within the Corridor and Preliminary Routeing and Siting Study Report (April 2022)
 - 21 April - 16 June non-statutory consultation: Suffolk Wildlife Trust comments included matters relating to the route selection process, protected sites in the Waveney Valley, bird collision risk, County Wildlife Sites, Priority Habitats, Network Expansion Zones, undergrounding impacts in Dedham Vale National Landscape, and Biodiversity Net Gain.
- 2023
 - Development of the 2023 Preferred Draft Alignment, responding to feedback and other studies, as described within the Design Development Report (June 2023)
 - 27 June - 21 August non-statutory consultation on the 2023 Preferred Draft Alignment: Suffolk Wildlife Trust comments included matters relating to impacts to the WaLOR

project, Dedham Vale National Landscape, and the River Gipping CWS and Sroughton Park CWS, as well as additional Biodiversity Net Gain comments.

- August - Meeting to discuss Biodiversity Net Gain - potential off-site scheme/initiatives
- 2024
 - Development of the 2024 Preferred Draft Alignment, responding to feedback and other studies as described within the Design Development Report (April 2024) and Preliminary Environmental Information Report (PEIR) (April 2024).
 - 10 April - 26 July Statutory Consultation on the 2024 Preferred Draft Alignment: Suffolk Wildlife Trust comments included the River Waveney crossing and impacts to the WaLOR project, with additional comments on protected species, protected sites, the crossing of the Dedham Vale National Landscape, Biodiversity Net Gain, and more general biodiversity considerations.
 - 17 March meeting between National Grid and Suffolk Wildlife Trust to discuss the Waveney and Little Ouse Landscape (WALOR) Recovery project area
 - 11 November meeting between National Grid and Suffolk Wildlife Trust to discuss BNG -related matters
- 2025
 - Development of the proposed Project Alignment prior to DCO submission, considering feedback and other studies
 - 30 January - 3 March Consultation for Suffolk on proposed changes to the underground cable alignment: Suffolk Wildlife Trust comments included the Waveney crossing pylon location and the proposed undergrounding of an existing overhead lines (OHL) at Thrandeston Marsh CWS.
 - 11 March - Meeting to discuss BNG and WaLOR project in relation to the Project
 - 24 April - Meeting between National Grid and Suffolk Wildlife Trust and WALOR to discuss offsite BNG and tree planting
 - 10 July - Meeting between National Grid and Suffolk Wildlife Trust and WALOR to discuss offsite BNG
 - 14 July 2025- Meeting to discuss the SoCG with Essex Wildlife Trust, Suffolk Wildlife Trust and Norfolk Wildlife Trust (NWT).
 - 15 September 2025 – National Grid provided the relevant Environmental Statement documents for consideration including the Outline Landscape and Ecological Management Plan and Outline Code of Construction Practice.
 - 24 September 2025 – Meeting to discuss comments and queries on the Environmental Statement with Essex Wildlife Trust, Suffolk Wildlife Trust and Norfolk Wildlife Trust.
 - 11 November 2025 – Meeting between National Grid and Suffolk Wildlife Trust and WALOR to discuss offsite BNG.

- 9 December 2025 – Meeting to discuss the Statement of Common Ground with Essex Wildlife Trust, Suffolk Wildlife Trust and Norfolk Wildlife Trust.
- 2026
 - 6 January 2026 – Meeting to discuss the WaLOR project with Suffolk Wildlife Trust and the Environment Agency.
 - 13 January 2026 – Meeting between National Grid and Suffolk Wildlife Trust to discuss offsite BNG.
 - 13 January 2026 – Meeting between National Grid and Suffolk Wildlife Trust to discuss outstanding issues in the SoCG.
 - 24 April 2026 – National Grid shared the Statement of Common Ground with Suffolk Wildlife Trust
 - 01 May 2026 - Meeting between National Grid and Suffolk Wildlife Trust to discuss outstanding issues in the SoCG.
 - 05 May 2026 – National Grid shared the Statement of Common Ground with Suffolk Wildlife Trust.
 - 26 June 2026 – Email correspondence from Suffolk Wildlife Trust on Statement of Common Ground outstanding matters.

5. Matters Agreed

ID	Issue	Agreement Reached	Date agreed	Relevant documentation
5.1	Waveney Valley Alternative	National Grid has concluded, based on its own technical assessments, that an undergrounding option that <i>a) avoids the need for open trenching through parts of the floodplain that contain peat soils that are the focus of floodplain habitat restoration proposals and b) achieves sufficient buried cable depth to prevent potential issues for proposed stage zero river restoration and restoration of floodplain wetland habitats</i> is not achievable. Suffolk Wildlife Trust agree that in these circumstances an undergrounding option through the Waveney Valley in the proposed location would not be compatible with the WaLOR Project.	24/04/2025	N/A
5.2	WaLOR Project Compatibility	Suffolk Wildlife Trust identified the potential for the Norwich to Tilbury Project to interact with the Waveney and Little Ouse Landscape Recovery (WaLOR) Project, particularly in relation to floodplain processes, habitat restoration and access. National Grid recognises the importance of the WaLOR Project and has engaged constructively with Suffolk Wildlife Trust, the WaLOR Project team and the Environment Agency, including through joint meetings. Design refinements have been made to minimise impacts within the Waveney Valley, including removal of a haul road, limiting permanent access to existing rights of access only, and securing mitigation through the Outline Landscape and Ecological Management Plan. On this basis, the principle that the Norwich to Tilbury Project can be delivered in a manner compatible with the WaLOR Project is agreed.	01/05/2026	N/A

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ID	Issue	Agreement Reached	Date agreed	Relevant documentation
5.3	WaLOR Project (bird diverters)	Agrees that the provision of bird diverters between pylons RG87 and RG88 within the Waveney Valley is acceptable precautionary mitigation with the likely enhancement of the area for birds as a result of the WaLOR proposals.	01/05/2026	N/A
5.4	County Wildlife Sites (CWSs) in Suffolk	Suffolk Wildlife Trust raised concerns regarding potential impacts on County Wildlife Sites within Suffolk, including Sroughton Park CWS and Roydon Fen LNR/CWS, particularly in relation to habitat disturbance, reptile populations and hydrological sensitivity. National Grid has assessed these potential impacts through the Environmental Statement and confirmed that impacts would be localised, temporary and reversible, with habitats reinstated following completion of works. Mitigation, reinstatement and long-term management measures are secured through the Outline Landscape and Ecological Management Plan and the Outline Code of Construction Practice, with detailed design incorporating micro-siting to avoid ecologically valuable areas where practicable. Hydrological safeguards are in place to protect Roydon Fen, and no long-term residual effects on County Wildlife Sites are predicted. On this basis, Suffolk Wildlife Trust agrees that impacts to County Wildlife Sites are appropriately assessed and mitigated in principle.	01/05/2026	N/A
5.5	Licensable Species and Designated Sites	National Grid has progressed species licensing with Natural England across the Order Limits within Suffolk. Letters of No Impediment have been obtained for water vole, hazel dormouse and badger, alongside a signed Impact Assessment and Conservation Payment Certificate for great crested newt, supported by updated ecological survey information submitted in November 2025, which confirms no material change to the conclusions of the Environmental Statement. No impacted bat roosts have been identified; however, National Grid is progressing the Suffolk elements of a project-wide	01/05/2026	N/A

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ID	Issue	Agreement Reached	Date agreed	Relevant documentation
		bat licence with Natural England, who has indicated support for the proposed approach. On this basis, licensable species matters within Suffolk are considered to be appropriately addressed through the statutory process with Natural England and secured DCO commitments, with any remaining discussions focused on detailed implementation and potential monitoring rather than the principle of compliance.		
5.6	Biodiversity Net Gain (BNG) Offsite Solutions	National Grid has been engaging constructively with Suffolk Wildlife Trust regarding the provision of off-site Biodiversity Net Gain units for the Norwich to Tilbury Project within Suffolk. Both parties acknowledge that discussions are ongoing, with National Grid confirming its commitment to securing the required off-site BNG units as the delivery process progresses. The matter relates to the mechanisms for delivering and securing off-site BNG units rather than the principle of off-site provision, which is accepted. On this basis, the principle of off-site Biodiversity Net Gain is treated as agreed, with ongoing discussions appropriately focused on delivery arrangements beyond the scope of the Statement of Common Ground.	01/05/2026	N/A
5.7	Peat soils	Comments provided in response to the Statutory Consultation in July 2024: Detailed mapping of peat soils within the river valley and robust and evidence-based proposals for compensating for any unavoidable loss of peat should be provided. National Grid conducted more detailed peat surveys in the Waveney Valley in late 2024 and determined that organic-rich (peaty) soils were present. Additional mitigation measures for the handling of organic-rich soils have been included in 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] .	01/05/2026	7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]

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ID	Issue	Agreement Reached	Date agreed	Relevant documentation
5.8	Waveney Valley – vegetation clearance	Suffolk Wildlife Trust sought clarification on the extent and nature of vegetation clearance associated with the Waveney Valley crossing. National Grid has confirmed that the 100 -120m width represents the limit of deviation and does not equate to wholesale vegetation removal. Vegetation clearance will be limited to that required for the final alignment and construction activities, with further reductions sought at detailed design. Vegetation management, reinstatement and enhancement are secured through the Outline Code of Construction Practice and the Outline Landscape and Ecological Management Plan. On this basis, the approach to vegetation clearance within the Waveney Valley is agreed in principle.	01/05/2026	N/A
5.9	BNG (approach)	National Grid has committed to delivering a minimum of 10% Biodiversity Net Gain for the Norwich to Tilbury Project on a voluntary basis, aligned with its corporate sustainability objectives and forming the basis of the assessment. In the absence of specific NSIP guidance, the BNG approach and assessment methodology have been agreed in principle with Natural England and relevant local authorities, applying the statutory metric and best-practice principles as set out in the Biodiversity Net Gain Report. Suffolk Wildlife Trust has expressed an aspiration for higher levels of BNG; however, this relates to the level of ambition rather than the acceptability of the approach, which is secured through the DCO. On this basis, the Project's BNG approach, including the commitment to a minimum of 10% net gain, is treated as agreed.	01/05/2026	N/A
5.10	WaLOR Project and BNG	Suffolk Wildlife Trust raised comments regarding Biodiversity Net Gain and the need to ensure that the project supports long-term habitat creation and enhancement objectives associated with WaLOR project. National Grid has confirmed that the Project's BNG assessment has been undertaken	01/05/2026	N/A

ID	Issue	Agreement Reached	Date agreed	Relevant documentation
5.11	Thrandeston Marsh CWS	Suffolk Wildlife Trust raised concerns regarding potential impacts on Thrandeston Marsh County Wildlife Site arising from the proposed undergrounding of the existing 132 kV overhead line. National Grid has assessed potential effects through the Environmental Statement and confirmed that impacts on the CWS would be localised, temporary and reversible. Where habitats within the CWS are temporarily affected, they will be reinstated to the baseline habitat type and condition following completion of works, with monitoring and adaptive management secured through the Outline Landscape and Ecological Management Plan. Detailed design will incorporate micro-siting to avoid ecologically important features where practicable, and construction activities are controlled through the Outline Code of Construction Practice. On this basis, Suffolk Wildlife Trust agrees that impacts on Thrandeston Marsh County Wildlife Site are appropriately assessed and mitigated, with no long-term residual effects anticipated, and this matter is resolved in principle.	01/05/2026	N/A
5.12	Air Quality	Suffolk Wildlife Trust raised comments regarding potential changes in nitrogen deposition at receptor ER_17 (Birch Wood) and the need to consider cumulative and in-combination effects. National Grid has assessed construction dust and traffic emissions within the Environmental Statement, which confirms that the predicted increase in nitrogen deposition at ER_17 is less than 1% of the relevant lower critical load and not significant, with cumulative and in-combination effects also assessed as	01/05/2026	N/A

ID	Issue	Agreement Reached	Date agreed	Relevant documentation
5.13	Hydrology	negligible during construction and operation. On this basis, potential air quality effects are considered to have been appropriately assessed and addressed through the Environmental Statement, with no significant residual effects anticipated and no further action required. Suffolk Wildlife Trust raised concerns regarding potential hydrological effects associated with undergrounding of the existing 132 kV overhead lines, including effects on groundwater, surface water and sensitive receptors such as the River Waveney and Roydon Fen. National Grid has confirmed that potential hydrological effects have been assessed within the Environmental Statement and that any dewatering required would be subject to a site-specific Hydrogeological Risk Assessment in accordance with commitment GH11 within the Outline Code of Construction Practice, with any additional mitigation agreed with the Environment Agency where necessary. On this basis, potential hydrological effects within Suffolk are considered to be appropriately managed through secured DCO commitments, with no long-term adverse hydrological effects anticipated.	01/05/2026	N/A
5.14	Mitigation Hierarchy	Suffolk Wildlife Trust sought reassurance that the mitigation hierarchy has been rigorously applied and clearly evidenced through scheme design and assessment. National Grid has confirmed that the mitigation hierarchy, as set out in the Planning Statement, has been applied throughout the routing, siting and design process, with avoidance prioritised where practicable and proportionate minimisation applied where avoidance was not possible. Updated ecological surveys covering approximately 97% of the Order Limits were submitted in November 2025, with no material change to the conclusions of the Environmental Statement. Mitigation, compensation and enhancement are secured through the Outline Landscape and Ecological Management Plan and Outline Code of Construction Practice,	01/05/2026	N/A

ID	Issue	Agreement Reached	Date agreed	Relevant documentation
		supported by the scheme BNG approach. On this basis, the application of the mitigation hierarchy is considered to be appropriately demonstrated and secured, and this matter is treated as agreed in principle.		
5.15	Hedgerow Loss	Suffolk Wildlife Trust raised concerns regarding hedgerow loss, habitat connectivity and potential effects on protected species. National Grid has confirmed that hedgerow impacts have been minimised through routing, siting and design, with mitigation, enhancement and management measures secured through the Outline Landscape and Ecological Management Plan, including targeted hedgerow planting using locally appropriate native species. Measures to maintain connectivity during construction, including temporary artificial bat flyways, are also secured. On this basis, hedgerow loss and connectivity effects within Suffolk are considered to be appropriately mitigated and managed through secured DCO commitments.	01/05/2026	N/A
5.16	Dedham Vale National Landscape	Suffolk Wildlife Trust raised concerns regarding potential impacts on wildlife within the Dedham Vale National Landscape, including effects on hazel dormouse and hedgerows associated with undergrounding works. National Grid has confirmed that no positive dormouse sites were identified within areas of proposed undergrounding, with all confirmed dormouse records located within areas of proposed 400 kV overhead line where hedgerow impacts are minimal, and a Letter of No Impediment has been issued by Natural England confirming the acceptability of the mitigation. On this basis, impacts within the Dedham Vale National Landscape are considered to have been appropriately assessed and managed through the statutory licensing framework and secured DCO commitments, with no significant residual effects anticipated.	01/05/2026	N/A

ID	Issue	Agreement Reached	Date agreed	Relevant documentation
5.17	WaLOR Project (engagement)	Suffolk Wildlife Trust requested assurance that the Main Works Contractor, including UK Power Networks, will discuss relevant detailed design parameters with the WaLOR Project team 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. Following these discussions wording has been added to the Outline Landscape and Ecological Management Plan, confirming the commitment to ongoing engagement between the WaLOR project, National Grid and UKPN during the detailed design stage.	26/06/2026	7.4 Outline Landscape and Ecological Management Plan [REP3-030]

6. Matters Not Agreed

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
6.1	WaLOR Project (additional bird diverters)	Notwithstanding the comments relating to Issue 5.2 and 5.3 in Table 5, Suffolk Wildlife Trust has requested that bird diverters are also installed on the overhead line south of Pylon RG88 between the pylon and Ling Road. This location-specific request for additional bird diverters has not been agreed.	The current positioning of bird diverters has been informed by the project-specific bird collision risk assessment and an understanding of likely bird flight behaviour in the vicinity of Pylon RG88. The pylon itself represents a prominent and highly visible structure within the landscape, and immediately to the south is an area of established woodland that will be retained, which is expected to limit regular flight activity across the overhead line in this location.	7.4 Outline Landscape and Ecological Management Plan [REP3-030]

ID	Issue	Suffolk Wildlife Trust position	National Grid response	Relevant documentation
6.2	County Wildlife Sites (CWSs) in Suffolk	Notwithstanding agreement in principle (5.4 and 5.11 in Table 5), Suffolk Wildlife Trust requested a commitment within the Outline Landscape and Ecological Management Plan to using green hay from local sources over seeding for reinstatement of County Wildlife Sites which was agreed by National Grid. Suffolk Wildlife Trust then requested a proposed wording change within the Outline Landscape and Ecological Management Plan, relating to a preference for the use of green hay rather than the consideration of green hay use on a case-by-case basis.	In contrast, the area to the north of Pylon RG88 is more open and is considered to provide a more likely flight pathway for birds moving through the area. On this basis, bird diverters are proposed to the north of the pylon, where they are anticipated to be most effective in reducing collision risk and no further bird diverters south of RG88 are deemed to be necessary. This matter remains not agreed between parties. National Grid notes that this request relates to detailed wording within the Outline Landscape and Ecological Management Plan, rather than the principle or acceptability of the agreed mitigation approach. The proposed wording change, a ‘preference for green hay where available’ is not considered necessary and removes the flexibility required by National Grid. While the principle of use of green hay as mitigation is agreed, the detailed wording on this matter within the Outline Landscape and Ecological Management Plan is not agreed.	7.4 Outline Landscape and Ecological Management Plan [REP3-030]

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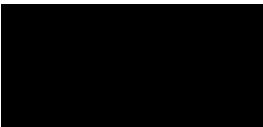
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7. Signatures

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

For National Grid

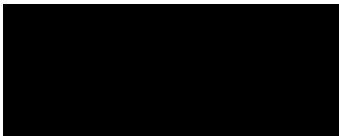


Name: Simon Pepper

Position: Project Director

Date: 14/07/2026

For Suffolk Wildlife Trust



Name: Rupert Masefield

Position: Head of Planning and Advocacy

Date: 21/07/2026

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