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Historic England - Clean Version

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1. Introduction

1.1 Overview

- 1.1.1 This final Statement of Common Ground (SoCG) has been prepared by National Grid Electricity Transmission plc (referred to as National Grid within this document) and Historic England (HE). It identifies areas of the Norwich to Tilbury Development Consent Order (DCO) application (the Application) where matters are agreed, under discussion or not agreed between the parties.
- 1.1.2 This SoCG is between National Grid and the Historic Buildings and Monuments Commission for England (hereafter Historic England) relating to the application for development consent for the Norwich to Tilbury ('the Project'). This SoCG has been prepared in accordance with the guidance for the examination of applications for development consent for Nationally Significant Infrastructure Projects (NSIP) (Planning Act 2008) published by the Department of Communities and Local Government (Department for Communities and Local Government, 2015).
- 1.1.3 This SoCG does not seek to replicate information which is available elsewhere within the application documents and submissions into the examination. All documents are available in the deposit locations and /or the Planning Inspectorate website.
- 1.1.4 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties. It identifies areas of the Project within the Development Consent Order (DCO) application ('the Application'), where matters are agreed, under discussion or not agreed between the parties.
- 1.1.5 The engagement between the parties across the breadth of matters has been extensive and is summarised in Chapter 2.
- 1.1.6 This final SoCG has been prepared for deadline 7, in accordance with the Rule 8 letter **[PD-011]**.
- 1.1.7 The parties will continue to work together beyond deadline 7, seeking further resolution where appropriate.

1.2 Summary of Matters Under Discussion

- 1.2.1 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
	No Heritage Matters remain under discussion at the point of submission of the final Statement of Common Ground.	

1.3 Project Description

1.3.1 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 (AONB))
- 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.

1.3.2 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 Biodiversity Net Gain (BNG).

1.3.3 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.

- 1.3.4 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.

1.4 This Statement of Common Ground

- 1.4.1 For the purpose of this SoCG, National Grid and Historic England will jointly be referred to as the 'Parties'.
- 1.4.2 This SoCG is structured as follows:
- Section 1 (this section) provides an introduction to this SoCG and a description of its purpose;
 - Section 2 states the role of Historic England in the application process and details engagement undertaken between National Grid and Historic England;
 - Section 3 sets out cultural heritage matters discussed between National Grid and the Historic England; and
 - Section 4 includes the signing off sheet

2. Record of Key Engagement

2.1 Role of the Consultee in the Process

2.1.1 Historic England exists to help people understand, value, care for and enjoy England’s unique heritage. Historic England is a prescribed consultee for the purpose of section 42(1)(a) of the Planning Act 2008 and is named as such in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, and perform the functions set out in the National Heritage Act 1983.

2.2 Introduction

- 2.2.1 National Grid has engaged with Historic England on the Project throughout the pre-application process. This has included:
- Non-statutory consultation in Spring 2022 and Summer 2023
 - Statutory consultation in Spring 2024
 - Targeted consultations in Spring 2025
 - One to one / small group technical meetings on specific detailed matters
 - Sharing of papers and documentation at key stages
- 2.2.2 Table 2.1 summarises the consultation and engagement that has taken place between the Parties.

Table 2.1 Summary of Key Engagement between National Grid and Historic England

Date	Format	Topic/Description
July 2022	Technical Note	National Grid shared document for scope and methodology for Historic Environment assessment and baseline discussion with Historic England.
July 2022	Meeting	Historic Environment Thematic Group – proposed approach for EIA assessment
September 2022	Meeting	Meeting to discuss updated approach to Study Areas, scoping of walkover and scoping of historic buildings
September 2022	Technical note/ Drawings	National Grid shared proposed noise and vibration scope and methodology for comment.
February 2023	Technical notes/Drawings	National Grid shared viewpoint location and rationale shared with stakeholder prior to landscape and heritage viewpoints discussion

Date	Format	Topic/Description
March 2023	Meeting	Meeting to discuss landscape and heritage viewpoints
June 2023	Technical note	National Grid issued Technical Note to agree methodology for the selection of viewpoints for the Historic Environment assessment.
Summer 2023	Response to non-statutory consultation	The Consultee provided its response to the non-statutory consultation in letter format.
September 2023	Meeting	Historic Environment Thematic Group meeting – heritage viewpoint methodology
September 2023	Meeting	Discussions about approach to assessment of specific high value designated heritage assets.
October 2023	Meeting	Discussions about approach to assessment of specific high value designated heritage assets.
November 2023	Meeting	Historic Environment Thematic Group – discuss proposed locations of heritage viewpoints
November 2023	Meeting	Discussion regarding the approach to geophysical survey and trial trenching.
November 2023	Meeting	Heritage Thematic Group Meeting – viewpoint locations shared in PDF and shapefile
January 2024	Technical note/Drawings	National Grid shared update on cultural heritage viewpoints for feedback, including ZTV
March 2024	Technical note/Drawings	National Grid shared Historic Environment Desk-Based assessment for review and comment
March 2024	Meeting	Archaeology Working Group Meeting
March 2024	Technical note/Drawings	National Grid shared updated WSI for Geophysical Surveys for feedback
April 2024	Meeting	Meeting to discuss questions in relation to the PEIR
April 2024	Meeting	Archaeology Working Group Meeting
May 2024	Technical note/Drawings	National Grid shared the ZTV on request to assist with reviewing the PEIR.
May 2024	Technical note/Drawings	National Grid shared the WSI – Monitoring GI works under archaeological Supervision
May 2024	Meeting	Archaeology Working Group Meeting
June 2024	Technical note/Drawings	National Grid shared the Overarching WSI for the Archaeological Trial Trenching for review and approval

Date	Format	Topic/Description
June 2024	Technical note/Drawings	National Grid shared the Site Specific WSI for the EACN (Site 001) shared for information. Report and separate plan issued.
June 2024	Meeting	Archaeology Working Group Meeting
July 2024	Meeting	Meeting to discuss the information presented with the PEIR
September 2024	Meeting	Archaeology Working Group Meeting
October 2024	Meeting	Archaeology Working Group Meeting
November 2024	Meeting	National Grid updated Historic England on the project and there was a discussion about the viewpoints, designation of assets and terminology used to interpret level of harm.
February 2025	Meeting	Meeting to discuss progress with actions from Meeting in November 2024
February 2025	Meeting	Meeting to discuss heritage viewpoints
February 2025	Technical note/Drawings	National Grid issued the second round of Heritage Viewpoints for consideration and comment.
February 2025	Meeting	Meeting to discuss heritage viewpoints in Essex
February 2025	Meeting	Follow up meeting to discuss heritage viewpoints in Essex
February 2025	Meeting	Meeting to discuss draft Historic Environment Baseline Report
March 2025	Meeting	Archaeology Working Group Meeting
April 2025	Meeting	Archaeology Working Group Meeting
May 2025	Meeting	Archaeology Working Group Meeting
May 2025	Meeting	Meeting to discuss targeted consultation responses
May 2025	Meeting	Meeting to discuss non designated assets
June 2025	Technical note	National Grid issued the Draft Outline Code of Construction Practice and Draft Outline Landscape and Ecological Management Plan
June 2025	Technical note	National Grid reissued the Outline AMS-OWSI upon request
June 2025	Meeting	Archaeology Working Group Meeting

Date	Format	Topic/Description
June 2025	Technical note	National Grid issued Draft DCO requirements, Explanatory Memorandum and Draft Requirements
July 2025	Meeting	Archaeology Working Group Meeting
August 2025	Meeting	Archaeology Working Group Meeting
August 2025	Technical note	National Grid shared DCO application documents for the Project.
August 2025	Technical note	National Grid reshared the Draft Outline Code of Construction Practice and Draft Outline Landscape and Ecological Management Plan
September 2025	Meeting	Meeting to discuss non designated assets
September 2025	Meeting	Archaeology Working Group Meeting
September 2025	Technical note	National Grid shared the preliminary geophysics greyscales with the archaeology working group participants
October 2025	Meeting	Meeting to discuss Statement of Common Ground progress.
October 2025	Meeting	Archaeology Working Group Meeting
November 2025	Meeting	Archaeology Working Group Meeting
December 2025	Technical note	National Grid shared the updated Statement of Common Ground with Historic England.
January 2026	Meeting	Archaeology Working Group Meeting
January 2026	Technical note	National Grid shared the updated Statement of Common Ground with Historic England.
February 2026	Email Correspondence	National Grid shared the Supplementary Environmental Information submitted to PINS on the geophysical survey and archaeological trial trenching completed to date with the Archaeology Working Group Stakeholders.
February 2026	Meeting	Archaeology Working Group Meeting
March 2026	Meeting	Archaeology Working Group Meeting
March 2026	Meeting	National Grid hosted a meeting to discuss the Statement of Common Ground and Written Representation.
April 2026	Meeting	Archaeology Working Group Meeting
May 2026	Meeting	Archaeology Working Group Meeting

Date	Format	Topic/Description
May 2026	Technical note	National Grid shared the Outline Archaeological Mitigation Strategy and Outline Scheme of Written Investigation and addressed feedback spreadsheet for comment.
June 2026	Meeting	National Grid hosted a meeting to discuss the Statement of Common Ground,
June 2026	Technical note	National Grid shared documentation for the Geoarchaeological Monitoring of GI WSI for comment.
July 2026	Meeting	Archaeology Working Group Meeting
July 2026	Technical Note	National Grid shared the Statement of Common Ground for final review.

3. This Statement of Common Ground

3.1 Overview

- 3.1.1

This chapter details the matters relevant to Historic England which have been agree or not agreed between the parties. Matters are arranged by topic and each matter is given a unique reference number to aid identification.
- 3.1.2

An additional column commenting on progress on outstanding matters has been included in this Statement of Common Ground as agreed between Historic England and National Grid.
- 3.1.3

The red and green status shows the level of agreement with Historic England. Descriptions of the different levels are summarised in Table 3.1.

Table 3.1 Agreement status for matters presented in Section 3

Status	Description
Not Agreed	Indicates a final position, where it has not been possible to resolve the issue to the agreement of both parties and there remains a difference of opinion.
Agreed	Indicates where an issue has been agreed or resolved satisfactorily to the agreement of both parties.

- 3.1.4

Engagement will continue as the Project develops and progresses through the various stages of the DCO process, including through detailed design.
- 3.1.5

Table 3.2 includes all matters and has columns that discuss the position and whether the matter is agreed.

3.2 Historic Environment Matters

Table 3.2 Historic Environment Matters

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
The Project					
3.2.1	Consents	In relation to the assessed effects of the project, no associated heritage consents are required in relation to Scheduled Monuments and Listed Buildings.	In relation to the assessed effects of the project, no associated heritage consents are required in relation to Scheduled Monuments and Listed Buildings.	Confirmed as Agreed in meeting with HE - 15 th October 2025	Agreed
Historic Environment					
3.2.2	ES – Regulatory, Planning Policy Context and Guidance - Policy and Legislation	The policy context, legislation and guidance considered when undertaking the Historic Environment assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) [APP-126] and Section 11.2 of Chapter 11 (Historic Environment) [APP-208] of the ES. All relevant legislation, policy and guidance has been identified and considered to inform the assessment. National Grid will continue to engage with Historic England on this matter.	HE position pending sight of ES.	Confirmed that HE were still reviewing documentation in meeting – 15 th October 2025 Confirmed in meeting on 9 th March 2026 that this matter can be turned to agreed.	Agreed
3.2.3	ES – Approach and Methods - Study area and baseline	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. A review of all grade II listed buildings within the 2km and 3km study areas was undertaken as part of the updates to	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. Comments from HE consultation	Confirmed as Agreed in meeting with HE - 15 th October 2025	Agreed

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
	information	Appendix 11.1 Historic Environment Baseline Report [APP-209] during late 2024 and early 2025 in order to inform the assessment presented in ES Chapter 11 Historic Environment.	response dated Summer 2024: While HE accept a 3 km study area, it might be valuable to review the grade II buildings to 3 km to ensure that where the wider setting contributes to their special architectural and historic interest, and to their significance, due consideration has been given.		
3.2.4	ES – Approach and Methods - Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 11.4 of Chapter 11 (Historic Environment) [APP-208] of the ES .	HE agrees with National Grid position as discussed in meeting on 15/10/2025.	Confirmed as Agreed in meeting with HE - 15 th October 2025	Agreed
3.2.5	ES – Approach and Methods - Assessment methodology	The methodology for assessing Historic Environment was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate	Comments from HE consultation response on 25 th July 2024: HE noted they are broadly content with the methodology and approach set out in the PEIR and the first indications of its application which can be seen in the Baseline Report. Crucial to evidencing the potential visual impacts on designated heritage assets during the forthcoming assessment process will be the production of wireline images of the landscape incorporating the proposed pylons and associated structures.	Confirmed as Agreed in meeting with HE - 15 th October 2025	Agreed

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
3.2.6	ES – Approach and Methods - Individual Heritage Assets - Scope of Assessment National Grid has provided details on 'scoping out' the listed buildings in Appendix 11.1 Historic Environment Baseline Report Annex E Scoped out listed buildings [APP-208]. National Grid will continue to engage with Historic England on this matter.	A phased approach to assessment of listed buildings has been implemented to most effectively focus ES assessment on likely significant effects. National Grid has provided details on 'scoping out' the listed buildings in Appendix 11.1 Historic Environment Baseline Report Annex E Scoped out listed buildings [APP-208]. National Grid will continue to engage with Historic England on this matter.	Historic England agree with the reason for 'scoping out' the listed buildings included in Appendix 11.1 Historic Environment Baseline Report Annex E Scoped out listed buildings (Document Reference 6.1.1.A1) Comments from HE consultation response in Summer 2024: HE are generally content with the approach to the Setting Survey in the PEIR (see 11.5.16-24) and have considered individual buildings as assessed in the Baseline Report on the merits of that assessment. We would agree with grouping buildings within settlements, assuming that settlement is an asset (i.e. a conservation area) and so benefits from assessment in its own right. It was agreed during the meeting on 15th October 2025 that HE are to review Appendix 11.1 Historic Environment Baseline Report Annex E Scoped out listed buildings [APP-208] prior to further discussion on this matter.	Confirmed that HE still need to review the Annex E of the Historic Environment Baseline Report prior to changing position in meeting- 15th October 2025. Confirmed in meeting on 9th March 2026 that this matter can be turned to agreed.	Agreed

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
3.2.7	ES – Approach and Methods - Key parameters and assumptions	Key parameters and assumptions associated with the Historic Environment assessment are summarised in Section 11.4 of Chapter 11 (Historic Environment) [APP 208] of the ES. The key parameters and assumptions presented are considered appropriate. National Grid will continue to engage with Historic England on this matter.	HE position pending sight of ES.	Confirmed that HE are to review the ES prior to changing position in meeting – 15th October 2025. Confirmed in meeting on 9th March 2026 that this matter can be turned to agreed. Measures proposed in Outline CoCP and Outline AMS/Outline WSI to manage unknown archaeology. It is acknowledged that fieldwork is still ongoing.	Agreed
3.2.8	ES – Baseline Conditions - Baseline conditions and receptors	The baseline conditions and receptors for Historic Environment are presented in Section 11.5 of Chapter 11 (Historic Environment) [APP 208] of the ES and Appendix 11.1 Historic Environment Baseline Report [APP 209]. The baseline conditions and receptors presented are considered appropriate. National Grid will continue to engage with Historic England on this matter. In the context of the Historic Environment assessment a receptor is considered an alternative way to refer to a Heritage asset.		Matter to remain under discussion (as confirmed by email 6.2.26). Further review to be undertaken following submission of Written Representation. Reviewed the ES and have not identified any additional receptors. Noted it would be useful to understand how the term receptor is identified. Confirmed in meeting on 9th March 2026 that this matter can be turned to agreed.	Agreed

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
3.2.9	ES – Embedded, Standard and Additional Mitigation Measures - Embedded mitigation	Embedded mitigation measures, designed as an inherent part of the Project relevant to Historic Environment effects, are set out in Section 11.6 of Chapter 11 (Historic Environment) [APP 208] of the ES. Embedded mitigation is considered adequate, in terms of its nature and scale, to address potential effects. National Grid will continue to engage with Historic England on this matter. The Applicant has provided adequate information for Historic England to review and to inform the overall assessment.	No comments received on the Outline AMS-OWSI. HE noted in a meeting to discuss the SoCG on 9th March 2026 that they acknowledge that the applicant has applied embedded mitigation in a number of locations across the whole project. There are concerns remaining about the degree of harm in locations which requires further discussion around balance. These are set out in the written representations. Historic England acknowledge the Applicant's position and confirmed in their Deadline 5 submission [REP5-250] that the balance of harm against the proposed mitigation is a matter for the decision maker.	Confirmed that HE are to review the ES prior to changing position in meeting – 15th October 2025. Confirmed as agreed in meeting on 19th June 2026.	Agreed
3.2.10	ES – Embedded, Standard and Additional Mitigation Measures - Standard mitigation	Standard mitigation measures to reduce potential effects during construction are summarised in Section 11.6 of Chapter 11 (Historic Environment) of the ES and set out in the Outline CoCP [APP-300]. The standard mitigation is considered adequate, in terms of its nature and scale, to address potential effects. National Grid will continue to engage with Historic England on this matter. The Applicant acknowledges the potential impacts of dewatering on the historic	It was noted during the meeting on 15th October that no comments have been sent to National Grid on the Outline CoCP, and that HE are to review the ES followed by further discussion on this matter.	Confirmed that HE are to review the ES prior to changing position in meeting – 15th October 2025. Confirmed in meeting on 9th March 2026 that this matter can be turned to agreed subject to further response in NG position on dewatering and high value archaeology.	Agreed

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
		environment. It should be noted that 6.9 Environmental Statement Chapter 9 – Contaminated Land, Geology and Hydrogeology [APP-181] concluded that neither groundwater levels nor groundwater receptors would be impacted by construction of above ground infrastructure, open cut trenching and trenchless crossing (paras 9.7.21 – 9.7.25). Therefore, it is concluded that groundwater levels beyond the Order Limits will not be impacted and by extension the environment of any potential archaeological remains will remain unchanged. Within the Order Limits provision for further geoarchaeological and palaeoenvironmental work is included in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], which will be updated in consultation with Local Planning Authority Archaeological Advisors and Historic England in response to detailed comments provided in Written Representations and Local Impact Reports. 7.2 Outline Code of Construction Practice (Revision B) [REP2-014] includes two controls to mitigate the impacts of dewatering: <i>“GH07 - Any temporary dewatering activities during construction will be</i>			

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
		undertaken in accordance with Environment Agency guidance (Environment Agency, 2023b. Environment Agency, 2022. Environment Agency, 2021a, Environment Agency 2021b) including appropriate assessment undertaken as required by the guidance (Environment Agency, 2007), and if required, an Abstraction Licence and Environmental Permit (for the discharge) will be obtained, and the works will be limited to the depth and time required to facilitate construction activities.” And: “GH14 - During dewatering of excavations, any water removed would be discharged as close to the excavations as practicable in line with GH07. Water would be discharged so that the dewatered groundwater body is recharged as much and as soon as practicable.” With these controls in place and the conclusions of 6.9 Environmental Statement Chapter 9 – Contaminated Land, Geology and Hydrogeology [APP-181] it is not considered that there is potential for significant effects to archaeology from dewatering.			
3.2.11	ES – Embedded, Standard and	The consideration of additional mitigation measures are presented in Section 11.6 of Chapter 11 (Historic Environment)	Historic England has provided two rounds of comments on the Outline AMS-Outline WSI and	Confirmed that HE are to review the ES prior to changing position in	Agreed

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
	Additional Mitigation Measures - Additional mitigation	[APP-208] of the ES and the Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. Additional mitigation is considered adequate, in terms of its nature and scale, to address potential effects. National Grid shared Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (Outline AMS-Outline WSI) in April 2025 for comment. An updated version of the document was submitted with the DCO application and, following comments from Historic England and the Local Planning Authorities, an updated version was submitted at Deadline 5 (7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]).	these have been actioned.	meeting – 15th October 2025. Confirmed that matter is still under discussion pending further review of updated versions of Outline AMS-OWSI documentation. Confirmed as agreed in meeting on 19th June 2026.	
3.2.12	ES - Embedded, Standard and Additional Mitigation Measures - Mitigation Hierarchy	The mitigation hierarchy has been applied to the Project throughout the iterative design process and is considered in Section 11.6 of Chapter 11 (Historic Environment) [APP-208] of the ES. The use of the mitigation hierarchy to avoid and minimise effects to heritage assets is considered adequate. Where effects to heritage assets would be unavoidable, appropriate mitigation and/or compensation measures are in place to mitigate these impacts.	HE position pending sight of the ES.	Confirmed that HE are to review the ES prior to changing position in meeting – 15th October 2025. Confirmed in meeting on 9th March 2026 that this matter can be turned to agreed following sight of the ES.	Agreed

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
3.2.13	ES – Assessment Conclusions - Construction effects - General	National Grid will continue to engage with Historic England on this matter.			
		The assessment of effects during construction is presented in Section 11.7 of Chapter 11 (Historic Environment) [APP-208] of the ES. The assessment of effects during construction presented is considered appropriate. National Grid will continue to engage with Historic England on this matter.	HE position pending sight of ES.	Confirmed that HE are to review the ES prior to changing position in meeting – 15th October 2025. Confirmed in meeting on 9th March 2026 that this matter can be turned to agreed.	Agreed
3.2.14	ES – Assessment Conclusions - Site Specific Construction effects – Waveney Valley	The assessment of effects during construction is presented in Section 11.7 of Chapter 11 (Historic Environment) [APP-208] of the ES. The assessment of effects during construction presented is considered appropriate. Regarding Bush Hall (Project ID 1013) the Applicant disagrees that the asset is of high value without further archaeological evaluation and an assessment of the damage caused in the 1960s when earthworks were destroyed and the moat partially backfilled. The Applicant is satisfied with the medium valuation assessed in 6.11.1A Historic Environment Baseline Report [APP-209] but acknowledges that this could change based on the results of any potential fieldwork. Although partially within the Order Limits, this is due to oversail by the overhead line	Subject to further assessment at Bush Hall in the Waveney and the Stour Valley in relation to the archaeology on the north and south side of the Stour and the deposits within the river valley. Matter is subject to further discussion pending further information. Historic England's position regarding the value of the Bush Hall is set out in their Deadline 5 submission [REP5-250]. The asset is considered to be of high value and potentially of equivalent significance with a scheduled monument.	Confirmed as agreed in meeting on 19th June 2026.	Agreed

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
		conductors and Bush Hall moated site is located outside areas of known physical impact as the site has been subject to embedded mitigation through design. 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] has been updated following comments from Historic England and contains measures for preservation in situ to ensure the physical preservation of the asset. Included measures would consist of toolbox talks for the construction workers and the physical fencing-off of the asset to avoid any accidental damage by construction plant. In addition, commitment GG34 in 7.2 Outline Code of Construction Practice (Revision F, submitted at Deadline 6) has been updated to include restriction of the Limit of Deviation (LoD) for the closest pylons (RG86 and RG87) to Bush Hall. As a result, there would be no direct physical impacts to this asset. With regard to the potential for the construction works to require dewatering, 6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181] concludes that dewatering is not anticipated. However, 7.2 Outline Code of Construction Practice [Revision B] [REP2-014] includes commitments GH07 and GH14 to mitigate groundwater effects.			

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
		Taken together commitments GH07, GH11 and GH14 ensure that any locations where dewatering is required would be managed to ensure as little change to the hydrological environment as possible. In practice, dewatering would be controlled and limited to the extent necessary for the construction area, the duration of dewatering would be kept as short as practicable, and the areas would be rewatered as quickly as possible. As a result of this the existing commitments provide protection to any archaeological remains within any area where dewatering is required, including those not directly exposed during construction and outside the areas of direct physical impact of the Project. With these controls in place, there is an extremely unlikely potential for any physical impacts on the asset. The Applicant, therefore, considers the assessment of the asset presented in 6.11.1A Historic Environment Baseline Report [APP-209], and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] as a permanent moderate adverse significance of effect is appropriate and proportionate. Although Historic England and the Applicant have a difference of opinion on the value of the asset the higher value			

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
		considered appropriate by Historic England would not alter the assessment conclusion (of permanent moderate adverse), as physical impacts to the asset have been avoided through mitigation. Therefore, even with Historic England's assessment this would not add sufficient weight to change decisions on Project design.			
3.2.15	ES – Assessment Conclusions - Site Specific Construction effects – Stour Valley	The assessment of effects during construction is presented in Section 11.7 of Chapter 11 (Historic Environment) [APP-208] of the ES. The assessment of effects during construction presented is considered appropriate. Regarding the Stour Valley there is ongoing archaeological evaluation for near surface archaeology and geoarchaeology in this area. The results of this work will be reviewed against the assessment conclusions and will inform mitigation. Provision for archaeological evaluation and mitigation and further geoarchaeological work is included in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161], which has been updated following comments from Historic England and Local Planning Authority Archaeological Advisors . With regard to the potential for the construction works to require dewatering,	Historic England acknowledge that evaluation works are on-going, and this will inform mitigation, we confirm we are happy with this approach however provision will need to be made to manage high value archaeology within this area should it become necessary and in line with the applicant's mitigation documentation.	Confirmed as agreed in meeting on 19th June 2026.	Agreed

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
		6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology [APP-181] concludes that dewatering is not anticipated, except in trenchless crossing locations. However, 7.2 Outline Code of Construction Practice [Revision B] [REP2-014] includes commitments GH07 and GH14 to mitigate groundwater effects. In addition, commitment GH11 provides that, <i>'At trenchless crossings and where otherwise indicated in the ES, within Appendix 9.3: Groundwater Baseline and Qualitative Groundwater Risk Assessment (document reference 6.9.A3), a Hydrogeological Risk Assessment will be undertaken to assess the specific risks to groundwater and groundwater receptors'</i>. Taken together commitments GH07, GH11 and GH14 ensure that any locations where dewatering is required would be managed to ensure as little change to the hydrological environment as possible. In practice, dewatering would be controlled and limited to the extent necessary for the construction area, the duration of dewatering would be kept as short as practicable, and the areas would be rewatered as quickly as possible. As a result of this the existing commitments provide protection to any archaeological remains within any area where			

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
		dewatering is required, including those not directly exposed during construction and outside the areas of direct physical impact of the Project. With these controls in place, there is an extremely unlikely potential for any effects on near surface archaeology of geoarchaeological/paleoenvironmental remains beyond the extent of the construction area. Any impact within the construction area would be mitigated through appropriate measure for the types of archaeological remains, as set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161].			
3.2.16	ES – Assessment Conclusions - Operational (and maintenance) effects - General	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of Chapter 11 (Historic Environment) [APP-208] of the ES. The assessment of effects during operation (and maintenance) presented is considered appropriate. National Grid will continue to engage with Historic England on this matter.	HE position pending sight of ES.	Matter to remain under discussion (as confirmed by email 6.2.26). Further review to be undertaken following submission of Written Representation. Confirmed in meeting on 9th March 2026 that this matter can be turned to agreed.	Agreed
3.2.17	ES – Assessment Conclusions - Operational (and maintenance)	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of Chapter 11 (Historic Environment) [APP-208] of the ES. The assessment of effects during operation (and maintenance) presented is	Following Historic England's submission at Deadline 5 [REF5-250], it is agreed that the project would result in less than substantial harm. Historic England disagree with the degree of less	Confirmed as agreed in meeting on 19th June 2026.	Agreed

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
	effects – Comments on specific designated heritage assets	considered appropriate. There is agreement between the Applicant and Historic England that the Project would not result in substantial harm. There is disagreement with the degree of less than substantial harm concluded in the assessment for a small proportion of the designated assets. Even with Historic England's assessment, this would not add sufficient weight to change decision making on project design. While we disagree on the degree of less than substantial harm this has been discussed and progressed as far as possible. The designated assets with which Historic England disagree with the degree of less than substantial harm are:	than substantial harm for the 15 designated assets listed in this matter.		
		• St Remigius Parish Church, Roydon (NHLE 1050237, listed grade I) • Mellis Conservation Area • Barn North of Castle (NHLE 1194552, listed grade II*) • All Saints' Parish Church, Fordham (NHLE 1239789, listed grade I) • Roman Villa, Anglo-Saxon Hall, Cemetery and Church Site, Around and to the North and East of St Mary and All Saints' Church (Scheduled Monument NHLE 1013831) • Wheat Barn (NHLE 1123866, listed grade I) and Barley Barn (NHLE			

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
		1123865, listed grade I), Cressing Temple • St Mary's Parish Church, Fairstead (NHLE 1337780, listed grade II*) • Little Waltham Conservation Area • Great Waltham Conservation Area • Broomfield Conservation Area • Chobbings Farmhouse (NHLE 1306286, listed grade II*) • Hylands Park (NHLE 1000197, Registered grade II*) • Cistern House (1187282) and Garden Wall North and East of Ingatestone Hall (1297190) located within the Ingatestone Hall complex This list has been updated following Historic England's Deadline 5 submission [REP5-250].			
3.2.18	ES – Assessment Conclusions - Operational (and maintenance) effects – Comments on specific designated heritage assets	The assessment of effects during operation (and maintenance) is presented in Section 11.7 of Chapter 11 (Historic Environment) [APP-208] of the ES. The assessment of effects during operation (and maintenance) presented is considered appropriate. There are five listed buildings with which Historic England disagree with details of the assessment and consider that aspects should have been considered in more detail but agree with the overall	Historic England agree with the level of less than substantial harm although Historic England have some comments on the detail included in the assessment.	Confirmed as agreed in meeting on 19th June 2026.	Agreed

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
		conclusion in terms of the degree of less than substantial harm. These assets are: • Creeting Hall (NHLE 1352073, grade II* listed) • Barn South West of Little Tey House (NHLE 1266779, listed grade II*) • Feeringbury Manor (NHLE 1306710, listed grade II*) and Ancillary Building to Southeast (NHLE 1123828, listed grade II*) • St Mary's Parish Church, Buttsbury (NHLE 1264434, listed at grade II*). This list has been updated following Historic England's Deadline 5 submission [REP5-250]. The Applicant and Historic England agree on the level of less than substantial harm although Historic England have comments on the detail included in the assessment.			
3.2.19	ES – Assessment Terminology – Approach to EIA and policy terminology	The assessment of effects presented in Section 11.7 of Chapter 11 (Historic Environment) [APP 208] of the ES and Appendix 11.2 Historic Environment Assessment Tables uses EIA terminology to describe effects. The assessment presented in Appendix 11.7 Assessment of Harm to Designated Heritage Assets [APP-215] also includes the assessment of impact presented in terms of 'harm', as per NPS EN-1 and this is considered appropriate.	As discussed in the meeting on 8th November 2024, Historic England agree that the Project would not result in 'Substantial Harm' as defined in The Planning Practice Guidance: Historic Environment Paragraph: 018 Reference ID: 18a-018-20190723. HE position pending sight of ES Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215].	Confirmed as Agreed in meeting with HE - 15th October 2025.	Agreed

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
		As discussed in the meeting on 8 November 2024, Historic England agree that the Project would not result in 'Substantial Harm' as defined in The Planning Practice Guidance: Historic Environment Paragraph: 018 Reference ID: 18a-018-20190723.			
3.2.20	Draft DCO / Outline Management Plans / Mitigation and Monitoring – Outline CoCP	The Outline CoCP [APP-300] includes relevant construction mitigation measures specified in Chapter 11 (Historic Environment) [APP-208] of the ES and is appropriate for managing construction impacts from the Project. The Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] presents appropriate additional mitigation measures the content and approach is considered adequate for managing construction impacts from the Project. National Grid shared the draft Outline CoCP and Outline LEMP with HE on 12 June 2025 for comment. Following receipt of comments from Historic England in their Written Representation an updated version of the Outline CoCP was submitted at Deadline 3 (7.2 Outline Code of Construction Practice (Revision C) [REP3-025]).	HE has not provided any comments on the Outline CoCP or Outline LEMP It was noted during the meeting on 15th October that no comments have been received by National Grid on these documents, and that HE are to review for further discussion on this matter.	Confirmed that HE position is still 'under discussion' - 15th October 2025. Confirmed in meeting on 9th March 2026 that this matter is still under discussion pending further legal discussions. Matter agreed during call with Historic England on 19th June 2026.	Agreed
3.2.21	Draft DCO / Outline	National Grid issued Draft DCO requirements, Explanatory Memorandum	HE has not provided comments on the Draft DCO Requirements,	Confirmed that HE require further review of	Agreed

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
	Management Plans / Mitigation and Monitoring – Draft DCO, Requirements, Explanatory Memorandum and Draft Requirements	and Draft Requirements in June 2025. Following receipt of comments from Historic England in their Written Representation an updated version of the draft DCO was submitted at Deadline 3 (3.1 Draft DCO [REP3-004])	Explanatory Memorandum and Draft Requirements.	the issued documents before changing position in meeting – 15 th October 2025. Confirmed in meeting on 9 th March 2026 that this matter is still under discussion pending further legal discussions. Matter agreed during call with Historic England on 19th June 2026.	

Other Matters

3.2.22	Overarching Written Schemes of Investigation (WSI) for pre-consent geophysical surveys and archaeological trial trenching.	National Grid shared the overarching WSIs in March – June 2024 and December 2024. National Grid noted feedback received from HE and incorporated feedback into the overarching WSI where applicable. The scope and methodology of the overarching WSI for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	HE Science Advisor provided comments on the Overarching WSI in Summer 2024 for consideration. The scope and methodology of the overarching WSI for pre-consent geophysical surveys and archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	Confirmed as Agreed in meeting with HE - 15 th October 2025	Agreed
3.2.23	Site specific Written Schemes of Investigation (WSIs) for pre-consent	The scope and methodology of site specific WSIs for pre-consent archaeological trial trenching is considered appropriate and proportionate to the level of evaluation required.	There are still addenda to site specific WSI's forthcoming that have yet to be issued, however the responsibility of the site specific WSIs lies with the local authority archaeological advisors	Confirmed as Agreed in meeting with HE - 15 th October 2025	Agreed

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
	archaeological trial trenching.		to approve.		
3.2.24	Programme for completion of archaeological fieldwork	A summary of the progress to date and future programme for the archaeological evaluation fieldwork for the Project was presented in the technical note: 'Summary of Archaeological Fieldwork - Progress and Programme', issued on the 27 June 2025. A phased approach to archaeological evaluation is being undertaken. The project has defined 'priority areas' on the basis of the likely scale of impact on archaeological remains, flexibility in design and construction programme. A proportion of the evaluation of 'priority areas' was complete at submission with the rest proposed to be completed pre examination. Evaluation of 'non priority areas' is proposed to be undertaken following completion of 'priority areas'. The programme for archaeological fieldwork is considered appropriate and proportionate to the level of evaluation required.	HE responded to the technical note 'Summary of Archaeological Fieldwork - Progress and Programme', in an e-mail dated 26th August 2025, stating: Broadly speaking we support the approach to set out priority areas and that fieldwork is then targeted towards these areas. We recognise this is something that needs to be agreed with Local Planning Authority (LPA) archaeological partners and recommend that the priority areas are agreed in conjunction with them, and that they are likewise able to confirm they are in agreement with both the priority areas themselves and the approach.	Confirmed as Agreed in meeting with HE - 15 th October 2025	Agreed
3.2.25	Outline Archaeological Mitigation Strategy and Outline WSI	The contents of the Outline Archaeological Mitigation Strategy and Outline WSI (AMS-OWSI) is considered appropriate and proportionate to the level of evaluation required. National Grid issued the Outline AMS-	HE position pending sight of the issued Outline AMS-Outline WSI.	Confirmed in meeting that further clarification on the position around fieldwork dissemination was required before change in the position in the meeting – 15 th October	Agreed

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
3.2.26	Programme for completion of archaeological fieldwork – Results dissemination	OWSI for the post-consent stage of the Project in April 2025. An updated version of the document was submitted with the DCO application and, following comments from Historic England and the Local Planning Authorities, is being updated and will be re-submitted at Deadline 5. The updated version will be shared with Historic England in advance of this for their review. Updated document incorporating stakeholder feedback was submitted at Deadline 5.	HE position pending position on fieldwork dissemination.	2025. Confirmed that matter is still under discussion pending further review of updated versions of Outline AMS-Outline WSI documentation. Matter agreed during call with Historic England on 19th June 2026.	Agreed

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
		- Phase 2 geophysical survey was 30% complete when the additional submission documents were submitted in January 2026 with the fieldwork currently continuing. The Applicant can add that as of April 2026, the Phase 2 geophysical survey is circa. 80% complete - Priority/Phase 1 archaeological trial trenching was 89% complete when the additional submission documents were submitted in January 2026 with the fieldwork currently continuing - Phase 2 archaeological trial trenching has yet to commence. However, the design of trench plans is well advanced, informed by geophysical survey and cropmark analysis - The walkover survey accessed approximately 97% of the survey area (access was denied for 3%). Document 6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213] was part of the DCO submission and included the assessment report for Site 001 as well as a further 15 interim reports. 6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [AS-078] submitted in January 2026 included assessment reports for Sites 002, 006, 007, 009 (part 1), 010, and 013 as well as			

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
		a further 20 interim reports. The remaining assessment reports for the priority area trial trenching will be shared with Local Planning Authority Archaeological Advisors for approval once complete. The Phase 2 stage of the geophysical survey and trial trenching will continue in 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. The Applicant has found that the assessment reports produced to date have not altered the conclusions of the assessment presented in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], where this is based on the combination of desk-based research, geophysical survey and trial trenching results from the interim reporting, indicating that this has reliably identified archaeological sites for the purposes of assessment. Assessment or interim reporting has been completed for all of the priority evaluation areas for which access was possible. The results of those reports received since the submission of supplementary environmental information in January			

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		2026 have been reviewed against the existing historic environment baseline and assessment (6.11 Environmental Statement Chapter 11 - Historic Environment - Clean Version [AS-068] and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and there are no changes. The results of the phase 2 geophysical survey and supplementary historic environment baseline and assessment have been submitted at Deadline 6. The Applicant therefore considers that an appropriate amount of archaeological evaluation has been completed.			
3.2.27	Historic Environment Viewpoints	National Grid has agreed location of viewpoints and types of visualisations to be produced. National Grid will continue to engage with Historic England on this matter.	The viewpoints have been agreed in thematic group meetings held between February 2023 and May 2025. Assets where viewpoint images were produced have been agreed.	Matter to remain under discussion (as confirmed by email 6.2.26). Further review to be undertaken following submission of Written Representation. Confirmed that this matter is agreed pending further consideration of wording in HE position.	Agreed
3.2.28	Supplementary Environmental Information	National Grid sought agreement on the approach to Supplementary Environmental Information in the technical note: 'Summary of Archaeological Fieldwork - Progress and Programme', issued on the 27 June 2025.	HE responded to the technical note 'Summary of Archaeological Fieldwork - Progress and Programme', in an e-mail dated 26th August 2025, stating: Broadly speaking we support the	Confirmed as Agreed in meeting with HE - 15th October 2025.	Agreed

ID	Matter	National Grid's Position	Historic England's Position	Comments on progress	Status
		National Grid's response to HE email of 26 August: To clarify the proposed approach as set out in the Outline AMS-OWSI is that detailed WSI's may be completed and agreed with LPAs, and if relevant Historic England, post-consent. We agree that the Outline AMS-OWSI is not yet final and still needs to be agreed with all parties before the end of examination and submitted as the final Outline AMS-Outline WSI.	approach to set out priority areas and that fieldwork is then targeted towards these areas. We recognise this is something that needs to be agreed with LPA archaeological partners and recommend that the priority areas are agreed in conjunction with them, and that they are likewise able to confirm they are in agreement with both the priority areas themselves and the approach. You also confirm below that any post-consent work will be managed is though the Outline AMS-Outline WSI and the subsequent Detailed WSI's. We again support this approach but aware these are currently under review and will need to be finalised prior to the end of the examination and agreed with all parties including ourselves. One difficulty we see with this is how new information would be integrated into the ES and introduced to the DCO material. We have discussed that you would issue regular addendum reports and again we would support that approach.		

4. Confirmation of Agreement

The above SoCG is agreed between National Grid and Historic England on the date specified below.

Signed for and on behalf of National Grid:

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Date:

20/07/2026

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Signed for and on behalf of Historic England:

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Date:

21/07/2026

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Abbreviations

Abbreviation	Full Reference
AMS	Archaeological Mitigation Strategy
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
GW	Gigawatts
HE	Historic England
NETS	National Electricity Transmission System
NG	National Grid
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
oCoCP	Outline Code of Construction Practice
OLEMP	Outline Landscape and Ecological Management Plan
(O)WSI	(Outline) Written Scheme of Investigation
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground

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