

AENC-NG-CNS-REP-0091

Norwich to Tilbury

Volume 5: Reports and Statements

Document: 5.9.13 Signed Statement of Common Ground -
Natural England - Tracked Changes Version

Final Issue D

July 2026

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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
<u>D</u>	<u>21 July 2026</u>	<u>Deadline 7</u>

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~~Appendix A Confirmation of Agreements~~

1 Introduction

1.1 Overview

1.1.1 This ~~draft~~final Statement of Common Ground (SoCG) has been prepared by National Grid Electricity Transmission plc (referred to as National Grid within this document) and Natural England. 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 The aim of a SoCG is to help the Examining Authority manage the examination phase of the application. Understanding the status of the matters at hand will allow the Examining Authority to focus their questioning and provide greater predictability for all participants in examination. A SoCG may be submitted prior to the start of or during examination and then updated as necessary or as requested during the examination phase.~~

1.1.2 This final signed version of the SoCG has been submitted at Examination Deadline 7.

1.2 Summary of matters under discussion

1.2.1 ~~As requested by the~~The Examining Authority, ~~the below requested that SoCGs contain a~~ table that 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. No matters remain under discussion, therefore the table has been removed.

SoCG-ID	Summary of matter under discussion	Deadline for resolution
Ecology and Biodiversity		
3.2.37— Embedded mitigation (ancient woodland)	Natural England is to further review into whether the proposed mitigation for Ancient Woodland adequately reduce the potential impacts with internal teams.	Resolution likely to be by Deadline 7 of Examination following NE review of the proposed mitigation.

1.3 Project Description

Project Need

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:

1.3.2 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.

- 1.3.3 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).
- 1.3.4 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.
- 1.3.5 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 Format and structure of this document

- 1.4.1 This SoCG is structured as follows:
- **Section 2** provides a summary of the key engagement undertaken to date with Natural England.

¹ National Landscape is the rebranded name of an Area of Outstanding Natural Beauty (AONB) from 22 November 2023

- **Section 3** summarises the key matters and captures the status of each issue / matter.
- **Section 4** includes the sign off sheet.

2 Record of Key Engagement

2.1 Introduction

- 2.1.1
- National Grid has engaged with Natural 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 Consultation in Spring 2025
 - One to one / small group technical meetings on specific detailed matters
 - Sharing of papers and documentation at key stages.
- 2.1.2
- Further details on National Grid’s engagement with stakeholders is provided in the **Consultation Report** and the **Environmental Statement**.

2.2 Summary of Key Engagement

- 2.2.1
- Table 2.1 provides an overview of the key engagement that has taken place between National Grid and Natural England.

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

Date	Format	Topic/Description
April 2025	Technical Note	National Grid issued drafts of the Outline Code of Construction Practice (CoCP) and Outline Landscape and Ecological Management Plan (LEMP).
June 2025	Email	National Grid outlined their initial approach in relation to additional measures to meet the s85 duty they were developing, including offering a meeting to discuss the wider approach and provide an update on outputs from the meeting with the local authorities and National Landscape Partnership Team in May 2025.
June 2025	Technical Note	National Grid issued the draft DCO, explanatory memorandum and draft DCO Requirements.
July 2025	Email	National Grid provided an update on progress in relation to additional measures to meet s85 duty and provided a document which outlined the package of measures for their review.
August 2025	Email	National Grid provided a further update on engagement and progress in relation to additional measures to meet s85 duty.

Date	Format	Topic/Description
August 2025	Technical Note	National Grid shared the draft submission documents for the Project.
October 2025	Technical Note	National Grid shared an updated Statement of Common Ground following submission of the development consent application.
November 2025	Technical Note	Natural England shared their Relevant Representations with National Grid.
January 2026	Meeting	Meeting to discuss Relevant Representations and Statement of Common Ground covering Agriculture and Soils, Contaminated Land, Hydrogeology and Geology, Landscape and Visual and Ecology.
April 2026	Meeting	Meeting to discuss the Statement of Common Ground.
May 2026	E-mail	National Grid shared an updated Statement of Common Ground.

Agriculture and Soils

June 2022	E-mail	National Grid issued the draft Agriculture and Soils Assessment Methodology for comment.
July 2022	Meeting	Meeting to discuss the proposed methodology and scope for Agriculture and Soils.
March 2025	Meeting	Meeting to discuss ALC Predictive Mapping.
July 2025	Meeting	Meeting to discuss ALC Predictive Mapping.

Ecology and Biodiversity

June – Sept 2022	E-mails and Meeting	A technical note was issued to Natural England to outline the proposed scope for wintering/passage bird surveys, in support of an Ecological Impact Assessment (EclA). A subsequent meeting was held to discuss and agree the scope.
July 2022	Meeting	Meeting to discuss proposed approach to the Environmental Impact Assessment (EIA) Scoping & Surveys.
July 2022	E-mail	National Grid issued the proposed scope for wintering/passage bird surveys, in support of the Habitats Regulations Assessment (HRA) and EIA.
July 2022	E-mail	National Grid issued the Biodiversity Assessment Methodology & Arboriculture Assessment Methodology for review ahead of Thematic Group.

Date	Format	Topic/Description
July 2022	Meeting	Ecology and Biodiversity Thematic Group meeting - Biodiversity and Arboriculture.
July 2022	E-mail	LVIA methodology and arboricultural assessment methodology shared for review and discussion at the Thematic Group Meeting.
July 2022	Meeting	Landscape and Visual Thematic Group meeting – LVIA methodology and arboricultural assessment methodology.
August 2022	Meeting	Meeting to discuss proposed scope for wintering/passage bird surveys, in support of the HRA and EIA.
August 2022	Meeting	Discussion of the use of Great Crested Newt (GCN) District Level Licensing (DLL)
March 2023	Meeting	Meeting to discuss Tilbury Site of Special Scientific Interest (SSSI) extension, Landscape and visual Impact Assessment (LVIA) and biodiversity.
June 2023	Technical Note	National Grid issued the breeding birds, bats and hazel dormouse survey methodology technical note and associated shapefiles.
August 2023	E-mail / Technical Note	National Grid issued the proposed approach to obtaining baseline information in support of the HRA and the HRA Scoping Note.
September 2023	E-mail	Natural England provided advice to National Grid regarding bat survey methodology.
November 2023	E-mail	Natural England provided their response to the bat survey methodology.
February 2024	E-mail	National Grid shared the programme for sharing information regarding ecology surveys and next steps.
February 2024	Meeting	Meeting to further progress discussions regarding the use of DLL.
March 2024	Meeting	Meeting to discuss and agree survey methodologies for bats and dormice.
March 2024	E-mail	National Grid provided further information in response to questions raised regarding the bat survey methodology.
March 2024	Meeting	Meeting to further progress discussions regarding the use of DLL.
May 2024	E-mail	National Grid provided further information, as requested, regarding the Bat Survey Methodology.

Date	Format	Topic/Description
August 2024	E-mail	National Grid issued the Ecology Survey Scope for review.
September 2024	Meeting	Meeting to discuss the proposed approach to BNG.
October 2024	Meeting	Meeting to discuss the initial licencing approach and mitigation solutions for bats, badger, dormouse, water vole and otter.
October 2024	E-mail	National Grid issued responses to comments raised by NE with respect to the HRA Draft Screening Report.
January 2025	Meeting	Meeting to discuss comments on the proposed draft mitigation for bats, badger, dormouse, water vole and otter.
January 2025	Meeting	Meeting to discuss the proposed design and targeted consultation.
January 2025	E-mail	National Grid shared the Draft Environmental Net Gain Report for comment.
January 2025	Meeting	Meeting to discuss comments received on the Draft Environmental Net Gain Report.
February 2025	Meeting	Meeting to discuss comments received on the updated draft HRA Report.
March 2025	E-mail	National Grid issued the Draft Wintering Bird Report and Associated Figures to Natural England for consideration and comment.
April 2025	Meeting	National Grid held a meeting to discuss the draft species licences.
May 2025	Meeting	Meeting to discuss the draft HRA.
June 2025	Meeting	National Grid had a meeting to agree the reporting approach to ecology surveys undertaken post March 2025.
June 2025	Technical Note	National Grid issued a technical note highlighting the approach to ecology surveys undertaken post March 2025.
October 2025	Technical Note	National Grid shared licencing information (Bats) with Natural England
October 2025	Technical Note	National Grid shared licencing information (Badgers Main Setts and Project Wide) with Natural England
October 2025	Technical Note	National Grid shared licencing information (Water Voles) with Natural England

Date	Format	Topic/Description
October 2025	Technical Note	National Grid shared licencing information (Dormouse) with Natural England
November 2025	Meeting	Meeting to discuss ancient woodland and Statement of Common Ground
December 2025	Technical Note	National Grid shared updated licencing information (Dormice) with Natural England
December 2025	Technical Note	National Grid shared updated licencing information (Bats) with Natural England
December 2025	Technical Note	National Grid shared updated licencing information (Badgers) with Natural England
January 2026	Technical Note	Natural England provided a response regarding Ancient Woodland in response to meeting in November 2025
February 2026	Meeting	Meeting to discuss updated licencing (all licences) information with Natural England
March 2026	Technical Note	National Grid shared updated licencing information for Bats and dormouse with Natural England
March 2026	Technical Note	National Grid shared updated licencing information for Badgers with Natural England
March 2026	Email	Natural England issued a Letter of No Impediment with respect to Water Voles
April 2026	Meeting	Meetings to discuss LTC nitrogen deposition
April 2026	Meeting	Meeting to discuss and progress the Statement of Common Ground
May 2026	Email	Natural England issued a Letter with respect to the agreed position on Bats and bat licencing.
June 2026	Meeting	Meeting to discuss Ancient Woodland and Veteran Trees.
July 2026	Meeting	Meeting to discuss Ancient Woodland and Veteran Trees.

Landscape and Visual

July 2022	E-mail	National Grid shared the LVIA methodology and Arboricultural assessment methodology for review and discussion ahead of the Thematic Group Meeting.
July 2022	Meeting	Landscape and Visual Thematic Group meeting – LVIA methodology and Arboricultural assessment methodology.

Date	Format	Topic/Description
January 2024	E-mail	National Grid shared an update on cultural heritage viewpoints, including ZTV (Zone of Theoretical Visibility).
October 2024	Meeting	Focus meeting to discuss the National Landscape.
January 2026	Meeting	Meeting to discuss Relevant Representation (including landscape queries)

3 Matters Agreed, or Not Agreed ~~or Under Discussion~~

3.1 Overview

- 3.1.1 This chapter details the matters relevant to Natural England which have been agreed, or not agreed ~~or are under discussion~~ between the parties. Matters are arranged by topic (using broad headings, or EIA chapter headings where appropriate) and each matter is given a unique reference number to aid identification.
- 3.1.2 The red, ~~amber,~~ and green status shows the level of agreement with Natural 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.
Under Discussion	Indicates where issues are the subject of active on-going discussion.
Agreed	Indicates where an issue has been agreed or resolved satisfactorily to the agreement of both parties.

- 3.1.3 Engagement will continue as the Project develops and progresses through the various stages of the DCO process, including detailed design.
- 3.1.4 Table 3.2 to Table 3.4 provides the matters agreed, or not agreed ~~or under discussion~~ in relation to the various topics.

3.2 Ecology and Biodiversity

Table 3.2 Matters Agreed, or Not Agreed ~~or Under Discussion~~ in relation to Ecology and Biodiversity

ID	Matter	National Grid's Position	Natural England's Position	Status
EIA - Regulatory, Planning Policy Context and Guidance				
3.2.1	Policy and legislation	The policy context, legislation and guidance considered when undertaking the Ecology and Biodiversity assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) [APP-126] and Section 8.2 of Chapter 8 (Ecology and Biodiversity) [AS-026] of the ES. All relevant legislation, policy and guidance have been identified and appropriately considered to inform the assessment.	Natural England position in agreement with National Grid following meeting to discuss the Statement of Common Ground on 13 January 2026.	Agreed
EIA - Approach and Methods				
3.2.2	Study area	The study area was agreed through 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.2.3	Data sources	Sufficient desktop and survey data has been collected to inform the assessment as presented within Section 8.4 of Chapter 8 (Ecology and Biodiversity) [AS-026] of the ES. The Applicant is reaching out to <u>consulted with</u> the Natural England licensing team for further discussion on this matter. A meeting to discuss licencing requirements was held on 19 February 2026 where it was identified that licensing matters were still under discussion.	Natural England defer to Natural England licensing team to understand position following meeting to discuss the Statement of Common Ground on 13 January 2026. Following receipt of <u>Letters of No Impediment (LONI)</u> for all relevant species, Natural England confirmed their agreement on this matter on 7 May 2026.	Agreed

ID	Matter	National Grid's Position	Natural England's Position	Status
3.2.4	Assessment methodology	The assessment methodology was agreed through 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate. Technical notes reviewed and discussed.	The assessment methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.2.5	Survey Methodology	The Applicant issued a technical note in May 2024 outlining survey methods and the scope of surveys for species outside the remit of Natural England for agreement / comment. Natural England agreed the survey methodology for European protected species and bird surveys in relation to internationally designated sites. National Grid have determined that the survey methodology is appropriate for the EIA in line with the standing advice and have agreed this with the relevant planning authorities.	Natural England is not providing bespoke comment on survey methodology that does not inform European Protected Species (EPS) licence or affect a protected site, although may provide detailed advice in exceptional cases where significant harm is likely (for example to an important but non-designated population) or on specific issues not covered by the standing advice. Natural England has directed National Grid to the relevant standing advice where appropriate. It is for National Grid as the applicant to determine that the survey methodology is appropriate for the EIA in line with the standing advice and agree this with the relevant planning authorities.	Agreed
3.2.6	Great Crested Newt (GCN)	The Applicant intends to offset the effects of the Proposed Development on GCN by obtaining a licence through the Natural England District Level Licence (DLL) scheme. 6.20 Scoping Opinion [APP-297] stated that the Inspectorate agrees that detailed consideration of GCN can be scoped out of the ES.	Natural England are in agreement with the approach of obtaining a licence through the Natural England (NE) District Level Licence (DLL) scheme. Letter of comfort received from Natural England DLL team in August 2022.	Agreed

ID	Matter	National Grid's Position	Natural England's Position	Status
3.2.7	Bat surveys	The bat survey scope was presented to Natural England on 4 March 2024. The following was agreed with Natural England and has been considered within this SS6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity rAS-026: - The scope of bat surveys which include a Ground Level Tree Assessment (GLTA), static detector surveys, Advanced Licence Bat Survey Techniques (ALBST) (radiotracking) surveys at one location and aerial tree climbed inspections. - Aerial tree inspections will only be undertaken pre-consent on those trees where barbastelle pass rates meet the agreed threshold. Bat Conservation Trust (BCT) guidelines will be followed for GLTA surveys.	Natural England are in agreement with the scope for bat surveys. <u>remains engaged with the scheme's ecological consultants to establish a licensable approach, informed by appropriate survey effort.</u>	Agreed
3.2.8	Badger	The study area was agreed through 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate and through the Preliminary Environmental Information Report (PEIR).	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate and through the PEIR.	Agreed
3.2.9	Water Vole	The study area was agreed through 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate and through the PEIR.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate and through the PEIR.	Agreed

ID	Matter	National Grid's Position	Natural England's Position	Status
3.2.10	Otter	The study area was agreed through 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate and through the PEIR.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate and through the PEIR.	Agreed
3.2.11	Dormouse	A technical note was issued to Natural England in June 2023 outlining the proposed scope for hazel dormouse survey methodology and survey area .	Natural England are in broad agreement on survey methodology to be in line with best practice and the approach to defining survey areas.	Agreed
3.2.12	Breeding Bird	A technical note was issued to Natural England in June 2023 outlining the proposed scope for breeding bird survey methodology and survey area .	Natural England are in broad agreement on survey methodology to be in line with best practice and the approach to defining survey areas.	Agreed
3.2.13	Key parameters and assumptions	Key parameters and assumptions associated with the Ecology and Biodiversity assessment are summarised in Section 8.4 of Chapter 8 (Ecology and Biodiversity) [AS-026] of the ES . The key parameters and assumptions presented are considered appropriate.	Natural England position in agreement with National Grid following meeting to discuss the Statement of Common Ground on 13 January 2026.	Agreed
EIA - Baseline Conditions				
3.2.14	Baseline conditions and receptors	The baseline conditions and receptors for Ecology and Biodiversity are presented in Section 8.5 of Chapter 8 (Ecology and Biodiversity) [AS-026] of the ES . The baseline conditions and receptors presented are considered appropriate.	Natural England position in agreement with National Grid following meeting to discuss the Statement of Common Ground on 13 January 2026.	Agreed

ID	Matter	National Grid's Position	Natural England's Position	Status
EIA- Embedded, Standard and Additional Mitigation Measures				
3.2.15	Embedded mitigation (General)	Embedded mitigation measures, designed as an inherent part of the Project relevant to Ecology and Biodiversity effects, are set out in Section 8.6 of Chapter 8 (Ecology and Biodiversity) [AS-026] of the ES . Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Natural England position in agreement with National Grid following meeting to discuss the Statement of Common Ground on 13 January 2026. Further consideration around embedded mitigation in relation to ancient woodland which is still under discussion (Section 3.3.37).	Agreed
3.2.16	Standard mitigation (General)	Standard mitigation measures to reduce potential Ecology and Biodiversity effects during construction are summarised in Section 8.6 of Chapter 8 (Ecology and Biodiversity) [AS-026] of the ES and set out in 7.2 Outline Code of Construction Practice [REP3-025REP5-139] . The standard mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Natural England position still was under discussion with National Grid following meeting to discuss the Statement of Common Ground on 13 January 2026. Further investigation of the Outline LEMP and Outline CoCP was required before any changes in position. Matter agreed during a meeting on 24.04.2026.	Agreed
3.2.17	Additional mitigation	The consideration of additional mitigation measures are presented in Section 8.6 of Chapter 8 (Ecology and Biodiversity) [AS-026] of the ES . Additional mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects.	Natural England position in agreement with National Grid following meeting to discuss the Statement of Common Ground on 13 January 2026 _£	Agreed
3.2.18	Mitigation Hierarchy	The mitigation hierarchy has been considered in Section 8.6 of Chapter 8 (Ecology and Biodiversity) [AS-026] of the ES . The use of the mitigation hierarchy to avoid and minimise effects to biodiversity receptors is considered appropriate and adequate.	Natural England position in agreement with National Grid following meeting to discuss the Statement of Common Ground on 13 January 2026 _£	Agreed

ID	Matter	National Grid's Position	Natural England's Position	Status
		The Project has considered opportunities to enhance ecosystem services and natural capital within the design following the mitigation hierarchy to avoid and minimise effects to biodiversity receptors. Where effects to biodiversity receptors would be unavoidable, the design incorporates appropriate mitigation and/or compensation measures. The Project assesses effects on the biodiversity receptors within the ES (Volume 6 of the DCO application) and includes justification of any residual effects.		

EIA - Assessment Conclusions

3.2.19	Construction effects	The assessment of effects during construction is presented in Section 8.7 of Chapter 8 (Ecology and Biodiversity) [AS-026] of the ES . The assessment of effects during construction presented is considered appropriate.	Natural England position in agreement with National Grid following meeting to discuss the Statement of Common Ground on 13 January 2026	Agreed
3.2.20	Operational (and maintenance) effects	The assessment of effects during operation (and maintenance) is presented in Section 8.7 of Chapter 8 (Ecology and Biodiversity) [AS-026] of the ES . The assessment of effects during operation (and maintenance) presented is considered appropriate.	Natural England position in agreement with National Grid following meeting to discuss the Statement of Common Ground on 13 January 2026	Agreed

EI - Additional Ecology Survey Information (Nov 2025)

3.2.21	Further Ecology Survey Information (Nov 2025)	The Applicant sought agreement on the approach to further ecological survey information ('Approach to Further Ecological Information', issued on the 19 June 2025).	Response to the technical note: 'Approach to Further Ecological Information', received from NE dated 4 July 2025: Natural England is generally supportive of the approach outlined therein. Licencing	Agreed
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ID	Matter	National Grid's Position	Natural England's Position	Status
		Further ecology surveys were undertaken over the 2025 survey window and updated reports were submitted to Planning Inspectorate on 24 November 2025 [AS-026 to AS-041]. Additional ecology survey work that was subsequently submitted was supported by Natural England	specialists have advised that they have 'no concerns' with the proposal as presented. Where an absence of data exists Natural England Wildlife Licencing Service (NEWL8) is satisfied with an 'assumed presence' until surveys can be completed in line with industry best practice. It will up to the ecologists and the applicant to ensure sufficient data exists to inform draft licence applications. With regards to Biodiversity Net Gain and Habitats of Principle Importance we are satisfied that the current mix of aerial habitat surveys and ground truthing are sufficient to draw preliminary conclusions and commend the precautionary approach (e.g. assuming species presence/good condition) which is in line with good practice. We are therefore satisfied that the ES baseline will be sufficiently robust without results of the limited surveys (outlined in Table 1 of the above document) and commend the commitment to gathering and presenting further survey information as and when it becomes available.	

Draft DCO / Outline Management Plans / Mitigation and Monitoring

3.2.22	Outline CoCP	7.2 Outline Code of Construction Practice [REP3-025] includes all relevant construction related mitigation measures specified in Chapter 8 (Ecology and Biodiversity) [AS-026] of the ES and is appropriate for	No comments received on the structure of the draft Outline CoCP at the time of writing. Position to be updated following review of	Agreed
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ID	Matter	National Grid's Position	Natural England's Position	Status
		managing construction impacts from the Project.	the most recent iteration of the Outline CoCP issued with the development consent application noted in meeting to discuss the Statement of Common Ground 13 January 2026. Matter considered still under discussion. Matter agreed during a call on 24.04.2026. Natural England have raised no objection/ no comments/concerns to the Outline CoCP.	
3.2.23	Outline LEMP	7.4 Outline Landscape and Ecological Management Plan [REP3-030] includes all relevant operational related mitigation measures specified in Chapter 8 (Ecology and Biodiversity) [AS-026] of the ES and is appropriate.	No comments received on the structure of the draft Outline LEMP at the time of writing. Position to be updated following review of the most recent iteration of the Outline LEMP issued with the development consent application noted in meeting to discuss the Statement of Common Ground 13 January 2026. Matter considered still under discussion. Matter agreed during a call on 24.04.2026. Natural England have raised no objection/ no comments/concerns to the Outline LEMP.	Agreed
Biodiversity Net Gain				
3.2.24	Calculation	The Applicant will deliver at least 10 % BNG with wider environmental and societal benefits on its construction projects. 7.1 Biodiversity Net Gain Report [APP-299] sets out the approach to BNG.	Natural England welcomes the commitment to the delivery of a minimum of 10% ENG and BNG throughout the project. Whilst 10% is the minimum requirement, we encourage the applicant to consider a more ambitious percentage	Agreed

ID	Matter	National Grid's Position	Natural England's Position	Status
		Offsite BNG will be delivered through collaboration with partners and purchased from commercially registered providers.	biodiversity net gain target than the minimum. Any potential losses in high distinctiveness habitats (e.g. floodplain mosaic) will require a bespoke approach irrespective of mandatory requirements for BNG. Impacts on habitat condition/distinctiveness should be avoided, minimised, mitigated or compensated in accordance with the mitigation hierarchy. Natural England position in agreement with National Grid following meeting to discuss the Statement of Common Ground on 13 January 2026.	

Protected Species Licences

3.2.25	Other consents and licences	A draft Project wide bat licence will be applied for to enable the removal of and/or disturbance to non-maternity summer roosts of low conservation value and maternity roosts of high value (common and rarer species). The Project will seek to obtain bespoke licences to remove and/or disturb bat roosts not covered by the Project wide licence, on a case-by-case basis. As part of the licensing approach to be submitted to Natural England, the Project will set out a procedure to be used during construction, that would avoid the need for separate conversations/licences for each bat roost found. A draft Project wide badger licence will be	Bats - National Grid proposed that the Project will follow a post-consent approach to survey roosts due to transient nature of roosts and long timeframe between the design phase and anticipated construction start date. Agreement was sought regarding mitigation measures under a Project wide licence based on pre-agreed criteria for non-maternity summer roost of low conservation value and maternity roost of high value (common and rarer species). Badger - National Grid outlined that for outlier and subsidiary setts an approach for agreeing principles of mitigation, similar to a class licence, would look to be agreed to allow flexibility should a new sett be found	Status not applicable. Details for each species outlined below
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ID	Matter	National Grid's Position	Natural England's Position	Status
		sought to enable the temporary or permanent closure of outlier and subsidiary setts that will be disturbed or removed by the Project. A bespoke badger licence will be applied for on a case-by-case basis to disturb or close a main or annexe sett. Such licences are to be sought as a last resort when impacts cannot be avoided, with appropriate mitigation in place to minimise impacts to badger. Works undertaken to displace water vole will be undertaken under a class licence that allows for the lawful displacement of water vole. A draft dormouse licence will be applied for to remove or manipulate habitat that supports hazel dormouse where these works are required to facilitate the Project. In March 2026, the Applicant obtained Letters of No Impediment (LONI) from Natural England for water vole, dormouse and badger confirming that 'Natural England sees no impediment to licences to derogate for impacts to badgers, dormouse and water vole being issued', The Applicant continues to work with Natural England towards agreeing a bat mitigation/compensation approach.	prior to/during construction. Water Vole - Natural England stated for a LONI, the 50 m displacement would be in line with class licence conditions. Natural England could approve this, assuming conditions of the licence are met. Natural England noted that they likely would not want to go down a Project wide licence route unless the conditions of class licence could be met. Hazel Dormouse - National Grid outlined that mitigation would include replacing vegetation (noting restrictions on planting under overhead lines and over the top of cables) and installation of dormouse boxes prior to vegetation clearance. Further consideration with Licensing team required following a meeting on 13 January 2026 discussing the Statement of Common Ground?	
3.2.26	Badger	The Applicant is reaching out to <u>consulted with</u> the Natural England licensing team to discuss this further as part of ongoing conversations on this matter. In March 2026, the Applicant obtained Letters	Further consideration with Licensing team required following a meeting on 13 January 2026 discussing the Statement of Common Ground , <u>A Letter of No Impediment (LONI) was</u>	Agreed

ID	Matter	National Grid's Position	Natural England's Position	Status
		of No Impediment (LONI) from Natural England for the Project confirming that 'Natural England sees no impediment to licences to derogate for impacts to badgers being issued'	issued on March 2026.	
3.2.27	Bat Roosts	No known bat roosts will be lost as a result of the Project currently and therefore a LONI from NBNatural England cannot be obtained. However, the Applicant is progressing a draft project wide license with Natural England on a precautionary basis (on the assumption bat roosts will be identified during preconstruction surveys) and has agreed the broad principles of mitigation.	Broad principles of bat mitigation and approach to bat licensing have been agreed with the Applicant. Natural England has provided the Applicant a Letter of Comfort to this effect, applicant with an advice letter providing further direction on licensable approaches	Agreed
3.2.28	Dormouse	The Applicant is currently progressing a draft project wide license with Natural England on a precautionary basis (on the assumption bat roosts will be identified during preconstruction surveys) and has agreed the broad principles of mitigation. The Applicant is currently progressing a draft project wide license with Natural England on a precautionary basis (on the assumption bat roosts will be identified during preconstruction surveys) and has agreed the broad principles of mitigation. In March 2026, the Applicant obtained Letters of No Impediment (LONI) from Natural England for the Project confirming that 'Natural England sees no impediment to licences to derogate for impacts to dormouse being issued'.	Further consideration with Licensing team required following a meeting on 13 January 2026 discussing the Statement of Common Ground , A Letter of No Impediment (LONI) was issued on March 2026.	Agreed
3.2.29	GCN	The Impact Assessment and Conservation Payment Certificate (IACPC) for the GCN district level licence application has been received and countersigned.	The IACPC for the GCN district level licence application has been issued and countersigned.	Agreed
3.2.30	Otter	No otter licence currently required as no impact on otter holts or breeding sites.	No otter licence currently required as no impact on otter holts or breeding sites.	Agreed
3.2.31	Water Vole	The Applicant is currently progressing a draft project wide license with Natural England on a precautionary basis (on the assumption bat roosts will be identified during preconstruction surveys) and has agreed the broad principles of mitigation. The Applicant is currently progressing a draft project wide license with Natural England on a precautionary basis (on the assumption bat roosts will be identified during preconstruction surveys) and has agreed the broad principles of mitigation. this further as part of ongoing conversations	Further consideration with Licensing team required following a meeting on 13 January 2026 discussing the Statement of Common	Agreed

ID	Matter	National Grid's Position	Natural England's Position	Status
		on this matter. In March 2026, the Applicant obtained Letters of No Impediment (LONI) from Natural England for the Project confirming that 'Natural England sees no impediment to licences to derogate for impacts to water vole being issued'.	Ground. A Letter of No Impediment (LONI) was issued on March 2026.	
Habitats Regulation Assessment (HRA)				
3.2.32	HRA Report	Letter received on 19 August 2025 stating that Natural England is broadly in agreement with the content of the draft HRA with a request for minor amendments. These amendments have now been were addressed and afere reflected in 5.3 Habitats Regulations Assessment Report [APP-082] .	Response from Natural England dated 19 August stated that: Natural England concurs that the sites identified and taken forward to the screening stage are considered appropriate and exhaustive. Natural England has not identified any impact pathways to any other international site designated for the purposes of ecology. Natural England is now content that the construction and operational stages of Norwich to Tilbury can be carried out without impacting on SPA species using functionally linked land. We advise, however, that all information provided to Natural England which allowed us to reach that conclusion should be drawn in to the HRA document, either into the main body or within the appendices. Natural England position in agreement with National Grid following meeting to discuss the Statement of Common Ground on 13 January 2026.	Agreed

ID	Matter	National Grid's Position	Natural England's Position	Status
3.2.33	Mitigation Hierarchy (HRA)	The mitigation hierarchy has been considered in 5.3 Habitats Regulations Assessment Report [APP-082] , The use of the mitigation hierarchy to avoid adverse effects on the integrity (alone or in combination with other plans and programmes) on European Sites is considered appropriate and adequate.	Natural England position in agreement with National Grid following meeting to discuss the Statement of Common Ground on 13 January 2026.	Agreed
3.2.34	Wintering/passage bird surveys	Meetings were held in June, July, August and September 2022 to outline and agree the proposed scope for wintering/passage bird surveys, in support of the Ecological Impact Assessment (EclA) and HRA. In July 2022 a technical note Technical Note was issued to Natural England to provide detail on the proposed scope for wintering/passage bird surveys. The September 2022 meeting was held to further discuss the methodology and agree the scope for further details see 5.3 Habitats Regulations Assessment Report [APP-082] . Agreement of wintering/passage bird survey scope for the Project with Natural England was obtained on 13 September 2022.	Agreement of wintering/passage bird survey scope for the Project with Natural England was obtained on 13 September 2022.	Agreed
3.2.35	Thames Estuary & Marshes SPA/Ramsar Site	Meeting A meeting took place in February 2025 to discuss and agree alternative agricultural land to provide refuge for birds relating to the Stour & Orwell Estuaries SPA/Ramsar and screening out impacts on Thames Estuary and Marshes SPA/Ramsar.	Correspondence from Natural England dated 20 May 2025. Further to our call of the 20 May 2025 Natural England is content for you to screen out impacts on Thames Estuary & Marshes SPA/Ramsar. Natural England position in agreement with National Grid following meeting to discuss the Statement of Common Ground on 13 January 2026.	Agreed

ID	Matter	National Grid's Position	Natural England's Position	Status
3.2.36	Stour & Orwell Estuaries SPA/Ramsar Site: Field Availability	Meeting A meeting took place in February 2025 to discuss and agree alternative agricultural land to provide refuge for birds relating to the Stour & Orwell Estuaries SPA/Ramsar and screening out impacts on Thames Estuary and Marshes SPA/Ramsar.	Correspondence from Natural England dated 20 May 2025. Based on the information that you have provided relating to the Stour & Orwell Estuaries SPA/Ramsar, Natural England do consider that there is sufficient alternative agricultural land to provide refuge for any birds disturbed during the construction phase of the development. Natural England position in agreement with National Grid following meeting to discuss the Statement of Common Ground on 13 January 2026.	Agreed
Ancient Woodland				
3.2.37	Embedded mitigation (ancient woodland and Veteran Trees)	Embedded mitigation measures, designed as an inherent part of the Project relevant to Ecology and Biodiversity effects, are set out in Section 8.6 of Chapter 8 (Ecology and Biodiversity) [AS-026] of the ES . Embedded mitigation is considered appropriate and adequate, in terms of its nature and scale, to address potential effects. National Grid discussed the Ancient Woodland Inventory (AWI) with Natural England following the updates for Essex in July 2025 and Suffolk in October 2025. National Grid presented the revised baseline from further reviews taken in September and October 2025. Further confirmation was sought on whether there was to be a revised AWI for Norfolk and the rationale for including the additional ancient	Natural England position still under discussion with National Grid following meeting to discuss the Statement of Common Ground on 13 January 2026. Prior to this meeting, Natural England noted on 12 January that there was further review into whether the proposed mitigation adequately reduce the potential impacts from internal teams. Natural England notes that the Outline LEMP Appendix B - Ancient Woodland and Veteran Tree Strategy will be updated at Deadline 7. Natural England confirmed their agreement on this matter on 16.7.2026.	Under discussion Agreed

ID	Matter	National Grid's Position	Natural England's Position	Status
		woodlands in the inventory. For the newly added ancient woodlands, potential impacts and proposed mitigation was discussed and agreed with Natural England. <u>The Applicant will update the Outline LEMP Appendix B - Ancient Woodland and Veteran Tree Strategy at Deadline 7.</u>		

ID	Matter	National Grid's Position	Natural England's Position	Status
Other Matters				
3.2.38	LTC nitrogen deposition	The Applicant acknowledges the potential effect on National Highways' (NH) proposed Hoford Road nitrogen deposition mitigation site, which is the site of the Applicant's proposed Tilbury North Substation. A detailed review of NH's Project Air Quality Action Plan (PAQAP) report has been undertaken, and following the same criteria as detailed within the PAQAP, suitable alternative Nitrogen Deposition (NDep) compensation sites have been identified. The Applicant notes Natural England's comments regarding the timing of the planting at the Brentwood Road NDep compensation site, which would be used by the Lower Thames Crossing as a construction compound for the duration of its works. The Applicant has proposed an additional 4.3 hectares of NDep compensation to the West of the Tilbury North Cable Sealing End Compound (CSEC) to address this delay. The Applicant has also included an additional 1.5 hectares of NDep compensation at the same site, should the Secretary of State approve the Lower Thames Crossing's proposed Brentwood Road realignment, which would reduce the extent of the Brentwood Road compensation site by 1.5 hectares. Natural England confirmed that they had no objection to this approach at a meeting between the parties on 20 April 2026.	Natural England acknowledges the Applicant's approach to providing alternative sites for the Lower Thames Crossing's nitrogen deposition compensation planting is in line with the LTC site selection criteria. Natural England understands that planting at the Applicant's Brentwood Road compensation site, which would be used by the Lower Thames Crossing (LTC) as a construction compound for the duration of its works, would be delivered later than the Hoford Road site LTC originally proposed. However, the Applicant is proposing an additional 4.3 hectares of nitrogen deposition compensation planting to the West of the Tilbury North Cable Sealing End Compound (CSEC) to address this delay. On this basis, Natural England raises no objection to the Applicant's proposal. Natural England also understands that there is sufficient land within the Applicant's Order Limits to the West of the Tilbury North CSEC, should the Secretary of State approve the Lower Thames Crossing's proposed Brentwood Road realignment, which would reduce the extent of the Brentwood Road compensation site.	Agreed

3.3 Landscape and Visual

Table 3.3 Matters Agreed, Not Agreed or Under Discussion in relation to Landscape and Visual

ID	Matter	National Grid's Position	Natural England's Position	Status
3.3.1	Study area	The study area was agreed through 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297] received from the Planning Inspectorate.	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.3.2	Landscape Viewpoints	In January 2024 _± National Grid shared an update on landscape viewpoints, including Zone of Theoretical Visibility (ZTV). The locations of viewpoints are shown on 6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [REP1-066] and associated baseline views are presented in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Parts 1 to 4 of 4 [APP-229 to APP-232] . The Applicant awaits further correspondence, and will continue to engage with Natural England on this matter.	Natural England position still under discussion with National Grid following meeting to discuss the Statement of Common Ground on 13 January 2026. It was noted that further internal discussions around landscape matters were required before this position could be changed. Natural England have not raised any concerns regarding the LVIA viewpoints or ZTV. Matter agreed during a call on 24.04.2026.	Agreed
3.3.3	Scope of the Landscape and Visual Assessment (LVIA)	In July 2022 National Grid shared the LVIA methodology and Arboricultural assessment methodology with Natural England for review. Meeting held in July 2022 to discuss LVIA methodology.	The scope of the LVIA was agreed through a technical note and meeting held in July 2022.	Agreed
3.3.4	Mitigation Hierarchy	The mitigation hierarchy has been considered in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] . The use	Natural England position still under discussion with National Grid following meeting to discuss the Statement of	Agreed

ID	Matter	National Grid's Position	Natural England's Position	Status
		of the mitigation hierarchy to avoid and minimise effects to landscape receptors (where practicable) is considered appropriate and adequate. Section 2.5 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] sets out the Applicants approach to the mitigation hierarchy for the Project. The Applicant's position on landscape mitigation is also set out in Section 3.10 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. The Applicant will further engage with Natural England on this matter.	Common Ground on 13 January 2026. It was noted that further internal discussions around landscape matters were required before this position could be changed. Natural England has raised no concerns relating to the mitigation hierarchy. Matter agreed during a call on 24.04.2026.	
Other matters as required				
3.3.5	Furthering the Purposes	The Applicant set out the approach taken by the Project and measures proposed in relation to the duty to seek to further the purposes of the National Landscape in accordance with Section 85 of the Countryside and Rights of Way Act 2000 in the 5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. The Applicant considers the package of measures that have been identified meet the requirements of section 85(1) of the CRoW Act and that they are appropriate, reasonable and proportionate and in accordance with NPS EN-1 (2024) and 2024 Defra guidance (Guidance	Natural England understand that the Applicant has reached agreement with the National Landscape Partnership on this matter and therefore Natural England has no objection.	Agreed

ID	Matter	National Grid's Position	Natural England's Position	Status
		for relevant authorities on seeking to further the purposes of Protected Landscapes). The additional measures will be secured by legal agreement, the Heads of Terms for which has been shared with the National Landscape <u>an unsigned version of the agreement was submitted at Deadline 5 with the signed version to be submitted at Deadline 7.</u> Section 3.11 of 8.8.2 Applicant's Comments on Local Impact Reports (Final Issue A) [REP2-030] also sets out the Applicant's approach to the duty. The Applicant has provided and will continue to provide Natural England with updates regarding the ongoing engagement with the National Landscape Partnership on this matter.		

3.4 Agriculture and Soils

Table 3.4 Matters Agreed, Not Agreed or Under Discussion in relation to Soils

ID	Matter	National Grid's Position	Natural England's Position	Status
3.4.1	Study area	The study area was agreed through 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297 received-297] <u>received</u> from the Planning Inspectorate. The study area was also agreed through a letter issued to Natural England setting out the	The study area was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate. The study area was also agreed through a letter issued to Natural England setting out the proposed methodology and scope, and meetings held in July 2022.	Agreed

ID	Matter	National Grid's Position	Natural England's Position	Status
		proposed methodology and scope, and meetings held in July 2022.		
3.4.2	Assessment methodology	The methodology was agreed through 6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion rAPP-297received-297] received from the Planning Inspectorate.	The methodology was agreed through the EIA Scoping Report and Scoping Opinion received from the Planning Inspectorate.	Agreed
3.4.3	ALC predictive mapping	The Applicant held a meeting on 12 March 2025 to discuss ALC predictive mapping and the methodology for assessing the impacts of the proposal on agricultural land/Best and Most Versatile (BMV).	E-mail from NE dated 13 March 2025 stated that Natural England were in agreement with the approach to assess the impacts of the proposal on agricultural land/BMV.	Agreed

4 Confirmation of Agreement

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

Signed for and on behalf of National Grid

[Redacted Signature]

Date:

20/07/2026

Signed for and on behalf of Natural England:

[Redacted Signature]
<< B9B41C9AD4BC..

Date:

21.04. 2026

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Modified filename: 5.9.13 Signed Statement of Common Ground - Natural England Revision D Clean Version.docx	
Changes:	
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Move To	0
Table Insert	6
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