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# Norwich to Tilbury

## Volume 6: Environmental Statement

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and Planning Policy Context

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**nationalgrid**

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## 2. Key Legislation and Planning Policy Context

### 2.1 Introduction

- 2.1.1 This chapter forms part of the Environmental Statement (ES) (Volume 6 of the Development Consent Order (DCO) application) for Norwich to Tilbury (the 'Project'). This chapter sets out a summary of the key legislative and planning policy context relevant to the Project in the context of this ES (Volume 6 of the DCO application).
- 2.1.2 The legislation and policies referred to in this chapter have been considered in the preparation of this ES (Volume 6 of the DCO application). References to relevant key legislation referred to in the ES (Volume 6 of the DCO application) are current as of May 2025. Further details on the legislative and policy framework relevant to specific environmental topic chapters are summarised in Chapters 6 to 17 (document references 6.1 to 6.17).
- 2.1.3 A Planning Statement (document reference 5.6) and Policy Compliance Document (document reference 5.7) have also been submitted as part of the DCO application. The Planning Statement (document reference 5.6) and the Policy Compliance Document (document reference 5.7) provides a comprehensive review of how the Project accords, for example, with the National Policy Statements (NPSs), policies in the National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2025) and local planning policy.

### 2.2 Legislative Context

#### Planning Act 2008

- 2.2.1 The Project is defined as a Nationally Significant Infrastructure Project (NSIP) under Section 14(1)(b) and Section 16 of the Planning Act 2008, as amended by the Planning Act 2008 (Nationally Significant Infrastructure Projects) (Electric Lines) Order 2013, as it involves the installation of an electric line above ground of more than 2 km which would operate at 400 kilovolts (kV) in England.
- 2.2.2 For an NSIP, the grant of development consent is required by the making of a DCO under the Planning Act 2008. A DCO may include a range of consents and powers.
- 2.2.3 The proposed new above ground electricity line would be an NSIP by virtue of the definitions in the Planning Act 2008. Other development, such as underground cables and cable sealing end (CSE) compounds, may be granted development consent as associated development within the meaning of s115 of the Planning Act 2008.
- 2.2.4 Section 104(2)(a) of the Planning Act 2008 states at (2)(a) that, in deciding the application, the Secretary of State must '*have regard to— - any national policy statement which has effect in relation to development of the description to which the application relates*'.

- 2.2.5 The Planning Act 2008 was amended through the adoption of the Localism Act 2011. Under the Localism Act 2011, the Planning Inspectorate is responsible for the NSIP planning process. The Planning Inspectorate will allocate a panel of examiners (known as the 'Examining Authority') which will examine the DCO application for the Project and make a recommendation to the Secretary of State to either grant or refuse consent.

## Electricity Act 1989

- 2.2.6 S9(2) of the Electricity Act 1989 places general duties on National Grid as a licence holder '*to develop and maintain an efficient, co-ordinated and economical system of electricity transmission...*'. In addition, s38 and Schedule 9 of the Electricity Act 1989 require National Grid, when formulating proposals for new lines and other works, to: '*...have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and shall do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects*'.
- 2.2.7 National Grid's Stakeholder, Community and Amenity Policy (National Grid, 2016) sets out how the company will meet the Schedule 9 duty placed upon it by the legislation.
- 2.2.8 National Grid duties are also determined by the terms of its Transmission Licence. As part of National Grid's Transmission Licence requirements, the transmission infrastructure needs to be capable of providing and maintaining a minimum level of security and quality of supply and of transporting electricity from and to customers. National Grid is required to ensure that the transmission system remains capable as customer requirements change. The transmission system must accommodate changes in demand, generation, and interconnectors.
- 2.2.9 National Grid must comply with Standard Condition D3 (Transmission system security standard and quality of service) of its Transmission Licence. This means that where the boundary capacity of the Main Interconnected Transmission System (MITS) is exceeded against the standards, National Grid must resolve the capacity shortfall under the terms of its Transmission Licence. The standards against which National Grid assesses these shortfalls are set out in the 'Design of the Main Interconnected Transmission System' section of the National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS).
- 2.2.10 The NETS SQSS also sets out in 'Generation Connection Criteria Applicable to the Onshore Transmission System' that connections to the transmission system must be secured to meet the identified requirements. Where the SQSS applies, the generator(s) are considered part of a 'generation group' for assessment against these criteria.
- 2.2.11 Generators apply to the National Energy System Operator (NESO) for connections to the NETS in Great Britain. NESO ensures the relevant onshore or offshore transmission owner undertakes generation connection process studies via the relevant process and makes a connection offer to the customer for a connection point and identifies the relevant infrastructure work needed to make the connection. Once this offer is signed the connection is recorded on the Transmission Entry Capacity (TEC) Register and forms a contractually binding connection location and timescale within which the transmission owner, such as National Grid, is required to connect the generation customer or undertake the works to facilitate their connection.



## The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

- 2.2.12 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations') govern the EIA process relevant to NSIPs. Schedule 1 of the EIA Regulations lists those projects for which an EIA is required and includes, under paragraph 20, the construction of overhead electrical power lines with a voltage of 220 kV or more and a length of more than 15 km.
- 2.2.13 The Project includes the proposed installation of 400 kV electricity transmission infrastructure over a distance of approximately 180 km, of which approximately 159 km is overhead line. It therefore falls under Schedule 1 and requires a statutory EIA.
- 2.2.14 Regulation 5 sets out the EIA process. This includes Regulation 5(2) which states that an EIA must identify, describe and assess the direct and indirect significant effects of the Project during construction and operation (and maintenance) on the environment (see Table 5.1 for a list of relevant factors), and EIA Regulation 5(4) which states that the assessment should include, where relevant, the expected significant effects arising from the vulnerability of the Project to major accidents or disasters. Schedule 4 of the EIA Regulations sets out the information to be included in an ES. There is a requirement under Regulation 32(1) to consider transboundary effects; that is, those effects that could affect receptors in other countries. A screening exercise was undertaken using Advice Note Twelve: Transboundary Impacts and Process, Annex I (Planning Inspectorate, 2020) as part of the scoping process. An EIA Scoping Report (document reference 6.19) was submitted to the Planning Inspectorate on the 4 November 2022, with a EIA Scoping Opinion (document reference 6.20) published on behalf of the Secretary of State on 10 December 2022. The ES (Volume 6 of the DCO application) is based on the EIA Scoping Opinion (document reference 6.20).
- 2.2.15 No transboundary effects were predicted in relation to the Project, as there is no pathway for effects to occur outside the UK – this was confirmed at the scoping stage. Advice Note Twelve was replaced in September 2024 by the Planning Inspectorate's Advice Page on Transboundary Impacts and Process (Planning Inspectorate, most recently updated in March 2025). That updated advice has been considered.
- 2.2.16 This ES (Volume 6 of the DCO application) has been prepared in accordance with the requirements of the EIA Regulations. Regulation 14 sets out the minimum requirements that should be included in the ES (Volume 6 of the DCO application). This is supported by Schedule 4, which identifies additional information to be included in an ES. Table 2.1 provides a summary of where the information required for inclusion in an ES under Regulation 14 and Schedule 4 of the EIA Regulations can be found.

Table 2.1 Location of information within this ES in accordance with the EIA Regulations

Requirements	Location in the ES (Volume 6 of the DCO application)
<b>Regulation 14 (Environmental Statements)</b>	
(1) An application for an order granting development consent for EIA development must be accompanied by an environmental statement.	The ES is within Volume 6 of the DCO application for development consent.
(2) An environmental statement is a statement which includes at least—	Chapter 4: Project Description (document reference 6.4) provides the description of the Project.
(a) a description of the proposed development comprising information on the site, design, size and other relevant features of the development;	
(b) a description of the likely significant effects of the proposed development on the environment;	Each environmental topic chapter (document references 6.6 – 6.17) assesses the likely residual significant effects of the Project on the environment in Section 7 (Residual Effects).
(c) a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;	Each environmental topic chapter (document references 6.6 – 6.17) identifies mitigation measures within Section 6 (Proposed Mitigation) to prevent/reduce and where possible avoid likely significant effects on the environment.
(d) a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment;	Chapter 3: Alternatives (document reference 6.3) provides a description of the reasonable alternatives considered and the main reason for the option chosen, taking into account the effects of the Project on the environment.
(e) a non-technical summary of the information referred to in sub-paragraphs (a) to (d); and	A non-technical summary summarising the information referred to in Regulation 14(2)(a) to (d) is provided (document reference 6.21)
(f) any additional information specified in Schedule 4 relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected.	Details on how the requirements of Schedule 4 have been met are outlined later within this table.
(3) The environmental statement referred to in paragraph (1) must—	

Requirements	Location in the ES (Volume 6 of the DCO application)
(a) where a scoping opinion has been adopted, be based on the most recent scoping opinion adopted (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion);	The Planning Inspectorate adopted the EIA Scoping Opinion (document reference document 6.20) for the Project on 10 December 2022. The scope of the ES is based on the EIA Scoping Opinion (document reference document 6.20). Further details can be found in Appendix 5.1: National Grid’s response to the EIA Scoping Opinion (document reference 6.5.A1).
(b) include the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment; and	Chapter 5: EIA Approach and Method (document reference 6.5) describes the EIA approach and method. Each environmental topic chapter (document references 6.6 – 6.17) provides the methodology and the assumptions used in reaching the reasoned conclusion on the likely significant effects of the Project on the environment in Section 4 (EIA Approach and Methods).
(c) be prepared, taking into account the results of any relevant UK environmental assessment, which is reasonably available to the applicant with a view to avoiding duplication of assessment.	The ES (Volume 6 of the DCO application) has been prepared taking into account relevant environmental data sources where available. These are listed within each environmental topic chapter (document references 6.6 – 6.17).
(4) In order to ensure the completeness and quality of the environmental statement—	
(a) the applicant must ensure that the environmental statement is prepared by competent experts; and	The EIA has been undertaken by competent experts with the relevant and appropriate experience in their respective topics. The EIA technical leads responsible for the individual chapters are provided in Appendix 1.1: Competent Experts Evidence (document reference 6.1.A1).
(b) the environmental statement must be accompanied by a statement from the applicant outlining the relevant expertise or qualifications of such experts.	
<b>Schedule 4 (Information for Inclusion in Environmental Statements)</b>	
(1) A description of the development, including in particular—	Items 1(ad) are provided in Chapter 4: Project Description (document reference 6.4). Further evidence on Item 1(d) is provided within the environmental topic chapters, in particular Chapter 6: Agriculture and Soils (document reference 6.6), Chapter 7: Air Quality (document reference 6.7), Chapter 9: Contaminated
(a) a description of the location of the development;	
(b) a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works, and the land-use	

Requirements	Location in the ES (Volume 6 of the DCO application)
<p>requirements during the construction and operational phases;</p> <p>(c) a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;</p>	<p>Land, Geology and Hydrogeology (document reference 6.9), Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) and Chapter 14: Noise and Vibration (document reference 6.14).</p>
<p>(d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.</p>	
<p>(2) A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.</p>	<p>Chapter 3: Alternatives (document reference 6.3) provides a description of the reasonable alternatives considered and the main reason for the option chosen, taking into account the effects of the Project on the environment.</p>
<p>(3) A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.</p>	<p>Section 5 (Baseline Conditions) of each environmental topic chapter (document references 6.6 – 6.17) and various appendices contain baseline survey data and a forecast of changes to the future baseline where applicable.</p>
<p>(4) A description of the factors specified in regulation 5(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage,</p>	<p>Each environmental topic chapter (document references 6.6 – 6.17) assesses the likely residual significant effects of the Project on the environment in Section 7 (Residual Effects). This is summarised in Chapter 18: Summary (document reference 6.18).</p>



Requirements	Location in the ES (Volume 6 of the DCO application)
including architectural and archaeological aspects, and landscape.	
<p>(5) A description of the likely significant effects of the development on the environment resulting from, inter alia—</p> <ul style="list-style-type: none"> <li>(a) the construction and existence of the development, including, where relevant, demolition works;</li> <li>(b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;</li> <li>(c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;</li> <li>(d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);</li> <li>(e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;</li> <li>(f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;</li> <li>(g) the technologies and the substances used.</li> </ul> <p>The description of the likely significant effects on the factors specified in regulation 5(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development.</p>	<p>Items 5(a), (b), (c) and (d) are covered in Section 7 (Residual Effects) of each environmental topic chapter (document references 6.6 – 6.17) and various appendices containing supporting assessment.</p> <p>Item 5(c) and (g) are covered in Chapter 4: Project Description (document reference 6.4).</p> <p>In relation to item 5(d), all potential effects related to accidents or disasters were scoped out from further assessment, as there would be no likely significant effects. A standalone Major Accidents and/or Disasters chapter is therefore not included in the ES, as agreed within the EIA Scoping Opinion (document reference 6.20).</p> <p>Item 5(d) in relation to human health is covered within Chapter 10: Health and Wellbeing (document reference 6.10).</p> <p>Item 5(d) in relation to cultural heritage is covered within Chapter 11: Historic Environment (document reference 6.11).</p> <p>Item 5(e) is covered within Chapter 17: Cumulative Effects (document reference 6.17).</p> <p>Item 5(f) is covered in Appendix 4.1: Greenhouse Gas Assessment (document reference 6.4.A1).</p>
<p>(6) A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required</p>	<p>Chapter 5: EIA Approach and Method (document reference 6.5) describes the EIA approach and method. Section 4 (EIA Approach and Methods) of each environmental topic chapter (document references 6.6 – 6.17), and various</p>

Requirements	Location in the ES (Volume 6 of the DCO application)
information and the main uncertainties involved.	appendices containing survey methodology, provide information specific to each topic.
(7) A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.	Embedded mitigation measures are described in Chapter 4: Project Description (document reference 6.4). Embedded, standard and additional mitigation measures, along with monitoring requirements (where applicable) are identified within Section 6 (Proposed Mitigation) of each environmental topic chapter (document references 6.6 – 6.17) where applicable, with residual effects described in Section 7 (Residual Effects).
(8) A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned.	All potential effects were scoped out from further assessment, as there would be no likely significant effects. A standalone Major Accidents and/or Disasters chapter is not included in the ES (Volume 6 of the DCO application), as agreed within the EIA Scoping Opinion (document reference 6.20).
(9) A non-technical summary of the information provided under paragraphs 1 to 8.	A non-technical summary is provided (document reference 6.21).
(10) A reference list detailing the sources used for the descriptions and assessments included in the environmental statement.	Sources are referenced within each environmental topic chapter (document references 6.6 – 6.17).

## Countryside and Rights of Way Act 2000 as amended by the Levelling-Up and Regeneration Act 2023

- 2.2.17 Areas of Outstanding Natural Beauty (AONB) are designated for their outstanding natural beauty. They are designated under Section 82 of the Countryside and Rights of Way Act 2000 to secure their permanent protection against development that would damage their special qualities. In November 2023, AONBs were renamed National Landscapes, but the legal designation for Dedham Vale (and the other 45 AONBs across the UK) remain AONBs.
- 2.2.18 National Grid, as a Statutory Undertaker, has a duty under s85 of the Act, as amended by Section 245 of the Levelling-up and Regeneration Act 2023 which states *‘In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty’*. This amendment replaces the previous duty to *‘have regard’* to the purposes of conserving and enhancing the natural beauty of a National Landscape.

- 2.2.19 S89 of the Countryside and Rights of Way Act 2000 requires a Management Plan to be produced for each National Landscape. These are statutory documents which are a material consideration in decision making. The Dedham Vale National Landscape and Stour Valley Management Plan 2021-2026 (Dedham Vale and Stour Valley and Landscapes for Life, 2021) is the current adopted plan.
- 2.2.20 The Management Plan covers the Dedham Vale National Landscape and the Stour Valley Project Area and sets out policies for its management. The Stour Valley Project Area is not currently designated, although an application has been submitted to Natural England to extend the Dedham Vale National Landscape to include parts of the Stour Valley Project Area.

## The Conservation of Habitats and Species Regulations 2017

- 2.2.21 Under the Conservation of Habitats and Species Regulations 2017 there is a requirement to undertake a screening exercise to determine whether there would be likely significant effects on European sites because of the Project, either alone or in combination with other plans and projects. If likely significant effects cannot be ruled out, an Appropriate Assessment must be carried out by the competent authority, in this case, the Secretary of State for Energy Security and Net Zero (the Secretary of State). The applicant must provide a report with the application showing the site(s) that may be affected together with sufficient information to allow the Appropriate Assessment to take place, in line with Advice on Habitats Regulations Assessments (Planning Inspectorate, 2025f).
- 2.2.22 In light of the conclusions of the Appropriate Assessment, other than where there are Imperative Reasons of Overriding Public Interest, the competent authority may only agree to the plan or project if it has ascertained the Project would not adversely affect the integrity of the European site. Further detail can be found within the Habitats Regulations Assessment Report (document reference 5.3).

## Environment Act 2021

- 2.2.23 The Environment Act 2021 provides a framework for improving environmental management across a wide spectrum of environmental issues including waste and resources, water quality, biodiversity, and air quality. It aims to deliver long-term targets to improve environmental conditions and reduce pollution, which would need to be considered by the Project.
- 2.2.24 Section 99 and Schedule 15 of the Environment Act 2021 amend the Planning Act 2008 by introducing a new Schedule 2A. Schedule 2A is not yet in force but, when it is, it will require NSIPs to meet a biodiversity gain objective that is set out in a biodiversity gain statement. This will involve delivering biodiversity gain as part of an application and for areas of BNG to be maintained for a specified period. Although this is not anticipated to become a statutory requirement for DCO projects until May 2026, National Grid has committed to deliver 10% BNG with wider environmental and societal benefits on all their construction projects requiring formal planning or consent, including Norwich to Tilbury.

## Natural Environment and Rural Communities (NERC) Act 2006

- 2.2.25 The Natural Environment and Rural Communities Act 2006 (established Natural England by merging English Nature, the Rural Development Service and the Countryside Agency).
- 2.2.26 It aims to promote the conservation of biodiversity, landscapes, and the natural environment while also supporting the sustainability of rural communities. The NERC Act emphasises the importance of protecting and enhancing biodiversity, promoting access to the countryside, and supporting the sustainable management of natural resources.
- 2.2.27 In relation to NSIPs, the NERC Act sets out regulations and guidelines for development projects that may affect the natural environment and rural communities. These include promoting transparency and public participation in decision-making processes related to environmental matters and ensuring that proper assessments and mitigation measures are in place to minimise any adverse effects.
- 2.2.28 Among other measures, the NERC Act sets a duty on public bodies and statutory undertakers to conserve and enhance biodiversity. This duty applies to all local authorities; community, parish and town councils; police, fire and health authorities; and utility companies. Section 41 of the NERC Act refers to a published list of habitats and species which are of principal importance for the conservation of biodiversity, including those that have been identified as priorities within the UK Biodiversity Action Plan (UK BAP).
- 2.2.29 The NERC Act requires that the Section 41 list be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under Section 40 of the NERC Act 'to have due regard' to the conservation of biodiversity when carrying out their normal functions.

## Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

- 2.2.30 The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 impose duties on the Secretary of State and the Environment Agency to carry out certain assessments, when deciding whether to grant, vary or revoke certain permits and licences which affect water quality.
- 2.2.31 Part 2 of the Regulations requires the identification of river basin districts, and several other assessments to be carried out by the Environment Agency to characterise and classify the status of water bodies in those districts and assess the economic aspects of water use. River basin management plans must be established for each river basin district.
- 2.2.32 The Regulations require several types of areas that are protected by other European Union derived legislation (for example, protected habitats and birds' sites) to be included on registers of protected areas.

## Other Legislative Requirements

- 2.2.33 Other legislation and policy relevant to the Project is considered further in the Planning Statement (document reference 5.6) and Policy Compliance Document (document reference 5.7).

## 2.3 National Policy Context

- 2.3.1 NPSs are produced by the government through a parliamentary approval process, and they present the planning policy framework for all decision making for NSIPs. They also include the government's objectives for the development of NSIPs and are produced for different types of infrastructure development.
- 2.3.2 In deciding an application for development consent, s104 of the Planning Act 2008 requires the Secretary of State to determine the application in accordance with any relevant NPS. The following NPSs which came into force on 17 January 2024 are relevant to the Project:
- Overarching National Policy Statement for Energy (EN-1) (Department for Energy Security and Net Zero (DESNZ), 2024a)
  - National Policy Statement for Electricity Networks Infrastructure (EN-5) (DESNZ, 2024b)
  - National Policy Statement for Renewable Energy Infrastructure (EN-3) (DESNZ, 2024c).
- 2.3.3 The Overarching National Policy Statement for Energy (EN-1) (DESNZ, 2024a) sets out national policy for energy infrastructure in combination with the relevant technology-specific NPS which in this case is National Policy Statement for Electricity Networks Infrastructure (EN-5). EN-1 (DESNZ, 2024a) emphasises the need for new energy projects to contribute to a secure, diverse, reliable and affordable energy supply.
- 2.3.4 The National Policy Statement for Electricity Networks Infrastructure (EN-5) (DESNZ, 2024b) sets out the government's policy for nationally significant electricity transmission networks and, together with EN-1, identifies the information that should be provided alongside any application for development consent to satisfy their requirements.
- 2.3.5 The National Policy Statement for Renewable Energy Infrastructure (EN-3) (DESNZ, 2024c) is also relevant in so far as the NPS includes support for the onshore infrastructure required to deliver new offshore wind developments.

### Overarching National Policy Statement for Energy (EN-1) (2024)

- 2.3.6 NPS EN-1 (DESNZ, 2024a) sets out the government's overarching policy about the development of NSIPs in the energy sector. It emphasises the need for new energy projects to contribute to a secure, diverse, and affordable energy supply.
- 2.3.7 Paragraph 2.1.3 of EN-1 recognises that to *'produce the energy required for the UK and ensure it can be transported to where it is needed, a significant amount of infrastructure is needed at both local and national scale. High quality infrastructure is crucial for economic growth, boosting productivity and competitiveness'*. Paragraph 3.3.65 states, *'There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives'*.
- 2.3.8 Section 3.3 sets out the need case for new nationally significant electricity infrastructure and recognises that the volume of onshore reinforcement works needed to meet decarbonisation targets is substantial. National Grid ESO (now



called NESO) forecasts that over the next decade, a doubling of north–south power transfer capacity will be required. Specific mention is made of the need for *‘substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation’* (Paragraph 3.3.68).

- 2.3.9 Section 4.2 sets out the critical national priority (CNP) for low carbon infrastructure: *‘Government has committed to fully decarbonising the power system by 2035, subject to security of supply, to underpin its 2050 net zero ambitions. More than half of final energy demand in 2050 could be met by electricity, as transport and heating in particular shift from fossil fuel to electrical technology’* (Paragraph 4.2.1).
- 2.3.10 Paragraph 4.2.5 goes on to explain, *‘for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations’* are CNP low carbon infrastructure.
- 2.3.11 Part 5 of EN-1 also sets out guidance on generic impacts that arise from development of any of the types of energy infrastructure covered by the energy NPSs in respect of matters such as air quality and emissions, biodiversity, dust and odour, flood risk, historic environment, landscape, land use, noise and vibration, socio-economics, traffic and transport, and waste management.

## National Policy Statement for Renewable Energy (EN-3) (2024)

- 2.3.12 NPS EN-3 also includes support for the onshore infrastructure required to deliver new offshore wind developments.
- 2.3.13 Section 2.8 deals with offshore wind. Paragraph 2.8.1 states that *‘As set out in the British Energy Security Strategy, the Government expects that offshore wind .... Will play a significant role in meeting demand and decarbonising the energy system. The ambition is to deploy up to 50GW of offshore wind capacity (including up to 5GW floating wind) by 2030, with an expectation that there will be a need for substantially more installed offshore capacity beyond this to achieve net zero carbon emissions by 2050.’*
- 2.3.14 Paragraphs 2.8.34 to 2.8.43 (inclusive) reiterate the position set out in EN-1 and EN-5 that a co-ordinated approach to onshore-offshore transmission is required. Paragraph 2.8.35 states that *‘The previous standard approach to offshore-onshore connection involved a radial connection between single wind farm projects and the shore. A coordinated approach will involve the connection of multiple, spatially close, offshore wind farms and other offshore infrastructure, wherever possible, as relevant to onshore networks.’*
- 2.3.15 The NPS also includes references to CNP Infrastructure outlining that the assessment principles outlined in Section 4 of EN-1 continue to apply to this. Applicants must show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. Early application of the mitigation hierarchy is strongly encouraged, as is engagement with key stakeholders including Statutory Nature Conservation Bodies (SNCBs), both before and at the formal pre-application stage.

## National Policy Statement for Electricity Networks Infrastructure (EN-5) (2024)

- 2.3.16 NPS EN-5 (DESNZ, 2024b) specifically relates to electricity networks.
- 2.3.17 Paragraph 2.1.5 of EN-5 notes that, as identified in EN-1, the government has concluded that there is a CNP for the provision of nationally significant low carbon infrastructure:
- ‘As stated in Section 4.2 of EN-1, to support the urgent need for new low carbon infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations, are considered to be CNP infrastructure’.*
- 2.3.18 Paragraph 2.1.6 of EN-5 goes on to note that, *‘The assessment principles outlined in Section 4 of EN-1 continue to apply to CNP infrastructure’.*
- 2.3.19 Paragraphs 2.2.1 and 2.2.2 note that:
- ‘The Secretary of State should bear in mind that the initiating and terminating points – or development zone – of new electricity networks infrastructure is not substantially within the control of the applicant.’ (Paragraph 2.2.1)*
- ‘Siting is determined by:*
- *the location of new generating stations or other infrastructure requiring connection to the network, and/or*
  - *system capacity and resilience requirements determined by the Electricity System Operator.’ (Paragraph 2.2.2).*
- 2.3.20 Paragraph 2.2.6 recognises that *‘...the locational constraints identified above do not, of course, exempt applicants from their duty to consider and balance the site-selection considerations set out below, much less the policies on good design and impact mitigation...’.*
- 2.3.21 Paragraph 2.2.10 of EN-5 reiterates the duties of transmission and distribution licence holders under Section 9 of the Electricity Act 1989, in relation to developing and maintaining an economical and efficient network, and under Schedule 9, in formulating proposals for new electricity networks infrastructure, to *‘have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiological features of special interest...’.*
- 2.3.22 Paragraph 2.4.1 notes that *‘The Planning Act 2008 requires the Secretary of State to have regard, in designating an NPS, and in determining applications for development consent to the desirability of good design’.*
- 2.3.23 Section 2.7 of EN-5 deals with holistic planning:
- ‘...the government envisages that, wherever reasonably possible, applications for new generating stations and their related infrastructure should be contained in a single application to the Secretary of State. However a consolidated approach of this kind may not always be possible...’ (Paragraph 2.7.2).*
- ‘This could be, for example, due to the differing lengths of time needed to prepare the applications for submission to the Secretary of State, or because a network application relates to multiple generation projects (which could be onshore or offshore), or because the works involved are strategic reinforcements required for a number of reasons’ (Paragraph 2.7.3).*

- 2.3.24 Section 2.8 deals with strategic network planning and Paragraph 2.8.1 sets out that, *‘A more strategic approach to network planning will ensure that network development keeps pace with renewable generation and anticipates future system needs’*. (This is also referred to in Paragraphs 2.13.1 to 2.13.13.)
- 2.3.25 Paragraph 2.9.7 recognises that *‘the government does not believe that the development of overhead lines is incompatible in principle with applicants’ statutory duty under Schedule 9 to the Electricity Act 1989, to have regard to visual and landscape amenity and to reasonably mitigate possible impacts thereon’ in practice new overhead lines can give rise to adverse landscape and visual impacts’*.
- 2.3.26 Paragraph 2.9.14 states that *‘Where the nature or proposed route of an overhead line will likely result in particularly significant landscape and visual impacts, as would be assessed through landscape, seascape and visual impact assessment, the applicant should demonstrate that they have given due consideration to the costs and benefits of feasible alternatives to the overhead line. This could include – where appropriate – rerouting, underground or subsea cables and the feasibility e.g. in cost, engineering or environmental terms of these.’*
- 2.3.27 Paragraph 2.9.16 recognises the importance of the guidelines provided in the Holford Rules. These guidelines, *‘intended as a common sense approach to overhead line design, were reviewed and updated by the industry in the 1990s and they should be embodied in the applicants’ proposals for new overhead lines’*.
- 2.3.28 Paragraph 2.9.18 refers to the Horlock Rules (guidelines for the design and siting of substations), advising that *‘these principles should be embodied in applicants’ proposals for the infrastructure associated with new overhead lines’*.
- 2.3.29 Paragraph 2.9.20 covers undergrounding:  
*‘Although it is the government’s position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, The Broads, or Area of Outstanding Natural Beauty)’*.
- 2.3.30 Subsequent paragraphs go on to say:  
*‘However, undergrounding will not be required where it is infeasible in engineering terms, or where the harm that it causes (see section 2.11.4) is not outweighed by its corresponding landscape, visual amenity and natural beauty benefits. Regardless of the option, the scheme through its design, delivery, and operation, should seek to further the statutory purposes of the designated landscape. These enhancements may go beyond the mitigation measures needed to minimise the adverse effects of the scheme.’* (Paragraph 2.9.22)  
*‘Additionally, cases will arise where – though no part of the proposed development crosses a designated landscape – a high potential for widespread and significant adverse landscape and/or visual impacts along certain sections of its route may result in recommendations to use undergrounding for relevant segments of the line.’* (Paragraph 2.9.23).
- 2.3.31 CNP is referred to again in Paragraph 2.12.7:  
*‘As highlighted in EN-1 government has concluded that there is a CNP for the provision of nationally significant low carbon infrastructure. This includes for electricity grid infrastructure, all power lines in scope of EN-5 including network*

*reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System. This includes infrastructure identified in the Holistic Network Design and subsequent strategic network design exercises...’.*

## 2025 Revisions to National Policy Statements

- 2.3.32 In April 2025, the government launched a consultation on proposed changes to EN-1, EN-3 and EN-5 that ended on 29 May 2025. The consultation covers updates to all three NPSs for new energy infrastructure:
- Draft: Overarching National Policy Statement for Energy (EN-1) (DESNZ, 2025a)
  - Draft: National Policy Statement for Electricity Networks Infrastructure (EN-5) (DESNZ, 2025b)
  - Draft: National Policy Statement for Renewable Energy Infrastructure (EN-3) (DESNZ, 2025c).
- 2.3.33 Changes consulted upon in the draft 2025 updates to the energy infrastructure NPSs include alignment with Clean Power 2030 targets and endorsement of the Centralised Strategic Network Plan. The 2025 revisions have strengthened the process for delivering major new infrastructure, reinforcing the government’s ambition to deliver clean power by 2030.
- 2.3.34 The transitional provisions on the status of the 2025 revisions say:
- ‘While the review is undertaken, the current suite of energy NPS remain relevant government policy and EN-1 to EN05 have effect for the purposes of the Planning Act 2008. The Secretary of State has decided that for any application accepted for examination before amending the energy NPSs, the current suite of energy NPS, published in 2024, should have effect. The amended energy NPSs will therefore only have effect in relation to those applications for development consent accepted for examination after the publication of the final amended energy NPSs. However, any emerging draft energy NPSs (or those amended but not having effect) are potentially capable of being important and relevant considerations in the decision-making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework of the Planning Act 2008 and with regard to the specific circumstances of each development consent order application’.*
- 2.3.35 At the point of submission of the Project, the NPSs designated in January 2024 were government policy. The application for development consent is accompanied by this ES (document reference 6.1 to 6.18) which provides the final assessment of the likely significant effects, associated with the Project during its construction and operation (including maintenance), after the mitigation hierarchy has been applied. The ES was prepared in accordance with the relevant requirements of NPS EN-1 and EN-5 in force as of 1 April 2025.
- 2.3.36 The emerging draft of the Overarching NPS for Energy (EN-1) reinforces the approach taken in the ES. The draft revised EN-1 and EN-5 reiterate the government's commitment to the Clean Power Action Plan 2030, which aims for at least 95% of the UK's electricity generation to come from clean sources by 2030 and emphasises the urgency and critical national priority (CNP) of developing low-carbon infrastructure, thereby supporting the need case established in the ES.

- 2.3.37 The draft revised EN-1 and EN-5 maintain the assessment principles and generic impact considerations outlined in the current EN-1 and EN-5, ensuring continuity in evaluating environmental effects. They also introduce enhanced guidance on biodiversity, flood risk, and climate resilience and the mitigation hierarchy. The ES is considered to be in compliance with these emerging draft NPSs.
- 2.3.38 If the revised NPSs are designated prior to a decision being made on the application for development consent, the ES and Planning Statement would be reviewed for consistency with the newly-designated NPSs, and any additional requirements would be captured within an errata document post submission. It was confirmed in Section 51 advice received from the Planning Inspectorate that if the new NPSs are adopted after the application has been submitted, the Examining Authority can issue procedural decisions to ask all parties for views on the impacts of new NPSs.

## National Planning Policy Framework

- 2.3.39 Paragraph 5 of NPPF (MHCLG, 2025) states:
- ‘The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework)’.*
- 2.3.40 While the NPSs remain the prime decision-making documents, regard must also be had to any other matters of importance and relevance, which may include relevant policies in the NPPF.

## Regional and Local Planning Policy

- 2.3.41 Although the relevant NPSs provide the primary policy against which NSIP proposals should be decided, regional and local policy documents may also be considered important and relevant to decision-making. The weight attached to them is likely to depend on their consistency with NPS policies given the national significance of the infrastructure.
- 2.3.42 This ES (Volume 6 of the DCO application) has considered current and emerging local policy documents relevant to the Project which are likely to inform the local impact reports prepared by the Local Planning Authorities, and which may be relevant and important in their own right.
- 2.3.43 The relevant adopted and emerging local plans for the Project comprise:
- South Norfolk Council:
    - Adopted:
      - Greater Norwich Local Plan (adopted 2024)
      - Site Specific Allocations and Policies Document (adopted 2015)
      - Development Management Policies Document (adopted 2015)
      - Wymondham Area Action Plan (adopted 2015)
      - The Long Stratton Area Action Plan (adopted 2016)
      - Diss and District Neighbourhood Plan (adopted 2023)



- Mulbarton Neighbourhood Plan (adopted 2016)
- Tasburgh Neighbourhood Plan (adopted 2024)
- Norfolk Minerals and Waste Development Framework: Core Strategy and Minerals and Waste Development Management Policies Development Plan Document 2010-2026 (adopted 2011)
- Norfolk Minerals and Waste Development Framework: Minerals Site Specific Allocations Development Plan Document (adopted 2013, amendments adopted 2017)
- Norfolk Minerals and Waste Development Framework: Waste Site Specific Allocations Development Plan Document (adopted 2013)
- Norfolk County Council Local Transport Plan 4 Strategy 2021-2036 and Implementation Plan (adopted 2022)
- Food Hub Supplementary Planning Document (adopted 2014)
- Open Space Supplementary Planning Document (adopted 2018)
- Norwich Research Park Development Framework Supplementary Planning Document (adopted 2009)
- South Norfolk Place-Making Guide Supplementary Planning Document (adopted 2012)
- South Norfolk landscape character assessments (published 2001 and updated in 2012)
- Norfolk County Council Parking Standard Supplementary Planning Document (revised 2022)
- Norfolk Minerals and Waste Local Plan (adopted 2025).

#### Emerging:

- Swainsthorpe Neighbourhood Plan (plan area designated in February 2024)
- Newton Flotman Neighbourhood Plan (plan consulted on between March and April 2025).

#### • Mid-Suffolk District Council:

##### Adopted:

- Babergh and Mid Suffolk Joint Local Plan: Part 1 (adopted 2023)
- Suffolk Minerals and Waste Local Plan (adopted 2020)
- Suffolk Local Transport Plan 2011-2031 (adopted 2011)
- Saved policies from the Stowmarket Area Action Plan (adopted 2013)
- Ashes Farm Development Brief and Delivery Framework (adopted 2016)
- Chilton Leys Development Brief Supplementary Planning Document (adopted 2013)
- Mill Lane Development Brief Supplementary Planning Document (adopted 2014)

- Edgecomb Park Development Brief Supplementary Planning Document (adopted October 2014)
- Land South of Union Road Development Brief April 2016 (adopted 2016)
- Social Infrastructure including Open Space, Sport and Recreation Supplementary Planning Guidance (adopted 2010)
- Babergh and Mid Suffolk Housing Supplementary Planning Document, (adopted 2024)
- Babergh and Mid Suffolk Intensive Livestock and Poultry Supplementary Planning Document (adopted 2024)
- Beyton Neighbourhood Plan (adopted 2024)
- Botesdale and Rickingham Neighbourhood Plan (adopted 2020)
- Debenham Neighbourhood Plan (adopted 2019)
- Diss and District Neighbourhood Plan (adopted 2023)
- Drinkstone Neighbourhood Plan (adopted 2021)
- Elmswell Neighbourhood Plan (adopted 2023)
- Eye Neighbourhood Plan (adopted 2021)
- Fressingfield Neighbourhood Plan (adopted 2020)
- Haughley Neighbourhood Plan (adopted 2019)
- Laxfield Neighbourhood Plan (adopted 2022)
- Mendlesham Neighbourhood Plan (adopted 2022)
- Needham Market Neighbourhood Plan (adopted 2022)
- Redgrave Neighbourhood Pla (adopted 2022)
- Stradbroke Neighbourhood Plan (adopted 2019)
- Stowupland Neighbourhood Plan (adopted 2019)
- Thorndon Neighbourhood Plan (adopted 2022)
- Thurston Neighbourhood Plan (adopted 2019)
- Walsham le Willows Neighbourhood Plan (adopted 2023)
- Wilby Neighbourhood Plan (adopted 2021)
- Woolpit Neighbourhood Plan (adopted 2022)
- Babergh and Mid Suffolk Biodiversity and Trees Supplementary Planning Document (adopted March 2024).

#### Emerging:

- Babergh and Mid Suffolk Joint Local Plan Review 2024-2044 (adoption anticipated April 2029)
- Baylham Neighbourhood Plan (plan area designated in May 2023).

- Babergh District Council:

**Adopted:**

- Babergh and Mid Suffolk Joint Local Plan: Part 1 (adopted 2023)
- Saved policies from the Babergh Local Plan Alteration No.2 (adopted 2006)
- Saved policies from the Babergh Local Plan 2011-2031 Core Strategy (adopted 2014)
- Suffolk Minerals and Waste Local Plan (adopted 2020)
- Suffolk Local Transport Plan 2011-2031 (adopted 2011)
- Babergh and Mid Suffolk Housing Supplementary Planning Document (adopted 2024)
- Babergh and Mid Suffolk Intensive Livestock and Poultry Supplementary Planning Document (adopted 2024)
- Babergh and Mid Suffolk Biodiversity and Trees Supplementary Planning Document (adopted March 2025)
- Aldham Neighbourhood Plan (adopted 2020)
- Assington Neighbourhood Plan (adopted 2022)
- Bentley Neighbourhood Plan (adopted 2022)
- Boxford Neighbourhood Plan (adopted 2022)
- Chelmondiston Neighbourhood Plan (adopted 2022)
- East Bergholt Neighbourhood Plan (adopted 2016)
- Elmsett Neighbourhood Plan (adopted 2019)
- Great Waldingfield Neighbourhood Plan (adopted 2023)
- Holbrook Neighbourhood Plan (adopted 2023)
- Lavenham Neighbourhood Plan (adopted 2016)
- Lawshall Neighbourhood Plan (adopted 2024)
- Leavenheath Neighbourhood Plan (adopted 2023)
- Little Cornard Neighbourhood Plan (adopted 2022)
- Little Waldingfield Neighbourhood Plan (adopted 2022)
- Long Melford Neighbourhood Plan (adopted 2022)
- Newton Neighbourhood Plan (adopted 2022)
- Sprooughton Neighbourhood Plan (adopted 2023)
- Stutton Neighbourhood Plan (adopted 2023)
- Whatfield Neighbourhood Plan (adopted 2022)
- Wherstead Neighbourhood Plan (adopted 2023).

### Emerging:

- Babergh and Mid Suffolk Joint Local Plan Review 2024-2044 (adoption anticipated April 2029)
- Copdock and Washbrook Neighbourhood Plan (local referendum due to take place July 2025)
- Capel St Mary Neighbourhood Plan (consulted on between February and March 2025)
- Elmsett Neighbourhood Plan Review (Regulation 17 examination due to start).
- Colchester City Council:

### Adopted:

- Colchester City Local Plan 2013-2033: North Essex Authorities' Shared Strategic Section 1 Plan, adopted February 2021
- Colchester City Local Plan 2017-2033 Section 2 (adopted July 2022)
- Essex and Southend-on-Sea Waste Local Plan (adopted 2017)
- Essex Minerals Local Plan (adopted 2014)
- Copford and Easthorpe Neighbourhood Plan (adopted 2023)
- Tiptree Neighbourhood Plan (adopted 2023)
- Boxted Neighbourhood Plan (adopted 2016)
- Eight Ash Green Neighbourhood Plan (adopted 2019)
- Marks Tey Neighbourhood Plan (adopted 2022)
- Myland and Braiswick (adopted 2023)
- Wivenhoe Neighbourhood Plan (adopted 2019)
- West Bergholt Neighbourhood Plan (adopted 2019)
- West Mersea Neighbourhood Plan (adopted 2022).
- Tendring Colchester Borders Garden Community Development Plan Document (adopted June 2025).

### Emerging:

- Colchester Local Plan Review 2024 (preferred Options Draft Plan Consultation anticipated spring 2025)
- Emerging Replacement Essex Minerals Local Plan 2025 to 2040 (Regulation 18 Consultation completed April 2024)
- Great Horkesley Neighbourhood Plan (plan area designated in June 2022)
- Great Tey Neighbourhood Plan (submitted to the Independent Neighbourhood Plan Examiner).
- Tendring District Council:

#### Adopted:

- Local Plan 2013-2033 and Beyond, comprising: North Essex Authorities' Shared Strategic Section 1 Plan (adopted 2021)
- Tendring District Local Plan 2013-2033 and Beyond: Section 2 (adopted 2022)
- Essex and Southend-on-Sea Waste Local Plan (adopted 2017)
- Essex Minerals Local Plan (adopted 2014)
- Alresford Neighbourhood Plan (adopted 2021)
- Ardleigh Neighbourhood Plan (adopted 2024)
- Elmstead Neighbourhood Plan (adopted 2024).
- Tendring Colchester Borders Garden Community Development Plan Document (adopted June 2025).

#### Emerging:

- Emerging Replacement Essex Minerals Local Plan 2025 to 2040 (Regulation 18 Consultation completed April 2024)
- Review of the Tendring District Local Plan (Issues and Options Consultation and Call for Sites completed April 2025)
- Brightlingsea Neighbourhood Plan (Neighbourhood Plan area designated May 2021).

#### ● Braintree District Council:

##### Adopted:

- Braintree District Council Local Plan 2033 Section 1 (adopted 2021)
- Braintree District Council Local Plan 2033 Section 2 (adopted 2022)
- Essex and Southend-on-Sea Waste Local Plan (adopted 2017)
- Essex Minerals Local Plan (adopted 2014)
- Affordable Housing Supplementary Planning Document (adopted 2006)
- Essex Coast RAMS Supplementary Planning Document (adopted 2020)
- External Artificial Lighting Supplementary Planning Document (adopted 2009)
- Open Space Supplementary Planning Document (adopted 2009)
- Bradwell with Pattiswick Neighbourhood Plan (adopted 2019)
- Coggeshall Neighbourhood Plan (adopted 2021)
- Cressing Neighbourhood Plan (adopted 2020)
- Feering Neighbourhood Plan (adopted 2023)
- Hatfield Peverel Neighbourhood Plan (adopted 2019)
- Kelvedon Neighbourhood Plan (adopted 2022)
- The Salings Neighbourhood Plan (adopted 2021).



### Emerging:

- Emerging Replacement Essex Minerals Local Plan 2025 to 2040 (Regulation 18 Consultation completed April 2024)
- Braintree District Local Plan 2013-2033 Review (Issues and Options Consultation ended on 7 March 2025).

- Chelmsford City Council:

### Adopted:

- Chelmsford Local Plan: Our Planning Strategy 2013 to 2036 (adopted 2020)
- Chelmsford Town Centre Public Realm Strategy (adopted 2011)
- Essex and Southend-on-Sea Waste Local Plan (adopted 2017)
- Essex Minerals Local Plan (adopted 2014)
- Little Baddow Neighbourhood Plan (adopted 2023)
- Broomfield Neighbourhood Plan (adopted 2025)
- Sandon Neighbourhood Plan (adopted 2023)
- South Woodham Ferrers Neighbourhood Plan (adopted 2021)
- Writtle Neighbourhood Plan (adopted 2021)
- Danbury Neighbourhood Plan (adopted 2024)
- West End Vision 2017 (adopted 2017).

### Emerging:

- Chelmsford Local Plan Review (Regulation 19 consultation completed March 2025)
- Emerging Replacement Essex Minerals Local Plan 2025 to 2040 (Regulation 18 consultation completed July 2024)
- Boreham Neighbourhood Plan (plan area amended in May 2024)
- East Hanningfield Neighbourhood Plan (plan area designated in September 2019).

- Basildon Borough Council:

### Adopted:

- Basildon District Council Local Plan Saved Policies (adopted 2007)
- Basildon District Council Compliance Review of the Saved 1998 Local Plan Policies with the Revised 2023 NPPF (adopted 2025)
- Planning Obligations Strategy Supplementary Planning Document (adopted 2015)
- Billericay Conservation Area Shop Front and Design Guide Supplementary Planning Document (adopted 2015)
- Essex and Southend-on-Sea Waste Local Plan (adopted 2017)
- Essex Minerals Local Plan (adopted 2014).

### Emerging:

- Basildon Local Plan Review (Regulation 18 Part 2 Consultation completed April 2025 with Regulation 19 planned for Autumn 2025)
- Emerging Replacement Essex Minerals Local Plan 2025 to 2040 (Regulation 18 Consultation completed April 2024).

- Brentwood Borough Council:

### Adopted:

- Brentwood Borough Council Local Plan 2016-2033 (adopted 2022)
- Essex and Southend-on-Sea Waste Local Plan (adopted 2017)
- Essex Minerals Local Plan (adopted 2014)
- Planning Obligations Supplementary Planning Document (adopted 2023)
- Dunton Hills Garden Village Supplementary Planning Document (adopted 2023)
- Essex Coast RAMS Supplementary Planning Document (adopted 2020)
- Brentwood Town Centre Design Guide Supplementary Planning Document (adopted 2019)
- Vehicle Parking Standards Supplementary Planning Document (adopted 2011)
- Shopfront guidance for Brentwood Town Centre Supplementary Planning Document, (adopted 2010)
- Urban Place Supplement Supplementary Planning Document (adopted 2007)
- Ingatestone and Fryerning Neighbourhood Plan (adopted 2022).

### Emerging:

- Emerging Replacement Essex Minerals Local Plan 2025 to 2040 (Regulation 18 Consultation completed July 2024).

- Thurrock Council:

### Adopted:

- Thurrock Local Development Framework, Core Strategy and Policies for management of Development (adopted 2015)
- Thurrock Borough Local Plan 1997 Saved Policies (adopted 1997).

### Emerging:

- The Thurrock Council Local Plan is currently under review and a new plan is set to be adopted in summer 2026 (Regulation 18 consultation completed February 2024).

## 2.4 Statutory Guidance

- 2.4.1 In April 2024, the Ministry of Housing, Communities and Local Government (2024) published an updated statutory guidance document on the pre-application stage for

NSIPs. While statutory requirements for consultation are provided in the Planning Act 2008, the purpose of the guidance is to:

- Advise all those likely to be involved in the pre-application stage of NSIPs about the processes
- Guide applicants (and potential applicants) as to how the pre-application requirements of the Planning Act 2008 (as amended) should be met and provide advice on good practice to seek continuous improvement in the quality of applications
- Guide applicants (and potential applicants) as to how the pre-application requirements of the EIA Regulations should be met
- Inform the main participants in National Infrastructure Planning, including the Planning Inspectorate and consultees such as statutory bodies and local authorities, of their roles in the pre-application process, and ensure that they are clear what is expected of them
- Provide advice on what is expected of an application for development consent to enable it to be accepted for examination
- Help ensure that the pre-application process is transparent and accessible to all.

## 2.5 Non-Statutory Guidance

### Planning Inspectorate Advice Pages

2.5.1 The Planning Inspectorate has published a series of non-statutory advice pages to inform developers, consultees, the public and other interested parties about a range of procedural matters in relation to the Planning Act 2008 process. Not all these advice pages are applicable to the ES (Volume 6 of the DCO application), although those that are integral, and have informed the environmental assessment process for the Project, are discussed further below:

- Advice Note Seven: Environmental Impact Assessment: process, preliminary environmental information and environmental statements (Planning Inspectorate, 2025a) details the procedural requirements that apply to NSIPs which are EIA development and provides clarity on its role and purpose
- Advice Note Nine: Rochdale Envelope (Planning Inspectorate, 2025b) provides guidance on the use of the 'Rochdale Envelope', a term used to describe those elements of a project that have not yet been finalised but can be constrained within certain limits and parameters hence allowing a determination of likely significant effects to be presented in the ES. When using the Rochdale Envelope to apply for flexibility within a DCO application, the developer should use a worst-case approach to identifying likely significant effects and should incorporate mitigation accordingly within the parameters of their scheme. Greater information is included within Chapter 4: Project Description (document reference 6.4) on how National Grid intends to make use of the Rochdale Envelope in the consenting process for the Project
- Advice on Cumulative Effects Assessment (Planning Inspectorate, 2025c) sets out the recommended approach to Cumulative Effects Assessment for NSIPs including guidance on the relative weight to be applied to other developments

depending upon how progressed they are through the consenting process. Greater information on the Cumulative Effects assessment for the Project is included within Chapter 17: Cumulative Effects (document reference 6.17)

- Advice on the Water Framework Directive (Planning Inspectorate, 2025d) sets out the approach to coordinating the requirements of the Water Framework Directive with the EIA process. Greater information is included within Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12)
- Advice on Transboundary Impacts and Process (Planning Inspectorate, 2025e) explains the roles and responsibilities of the Secretary of State, the Planning Inspectorate, European Economic Area Member States, and applicant applicable under Regulation 32 of the EIA Regulations
- Advice on Habitats Regulations Assessments (Planning Inspectorate, 2025f) provides advice for applicants in relation to the Habitats Regulations. It identifies the stages of the Habitats Regulations Assessment process and clarifies the information to be provided with a DCO application with respect to Habitats Regulations Assessment at each stage of the Planning Act 2008 process.

## 2.6 National Grid Policy and Guidance

2.6.1 National Grid has its own policies and processes that are followed when developing projects. The policies that are applicable to the Project are as follows:

- Our Approach to Options Appraisal (National Grid, 2012): This document describes the options appraisal process that is followed when developing new gas and electricity infrastructure projects. It follows a staged approach to the assessment and sets out the considerations when making decisions as to which option should be taken forward
- Our Stakeholder, Community and Amenity Policy (National Grid, 2016): This document describes the 10 commitments that National Grid has made to the way that electricity and gas works are carried out in the UK. This includes setting out how National Grid would meet its amenity responsibilities and how stakeholders and communities are involved on projects
- Our Approach to Consenting (National Grid, 2022): This document outlines National Grid's approach to developing and delivering new infrastructure and applies to projects across its whole regulated electricity transmission business.

2.6.2 National Grid also has an extensive range of process and guidance documents that govern how projects are designed and implemented to ensure operational safety.

### Holford Rules

2.6.3 Guidelines on overhead line routing were first formulated in 1959 by Sir William, later Lord, Holford, as advisor to the Central Electricity Generating Board. Holford developed a series of planning guidelines in relation to amenity issues, that have subsequently become known as the 'Holford Rules' (National Grid, n.d.) and remain a valuable tool in selecting and assessing potential overhead line route options as part of the options appraisal process. A summary of the Holford Rules can be found in Table 2.2. These have been an important consideration during the development of the Project and whether certain sections should be considered for undergrounding.

The Holford Rules are also expressly considered as part of EN-5. The principles of the Holford Rules are being applied to the Project.

Table 2.2 Summary of the Holford Rules

Rule	Description
Rule 1	Avoid altogether, if possible, the major areas of highest amenity value, by so planning the general route of the first line in the first place, even if the total mileage is increased in consequence.
Rule 2	Avoid smaller areas of high amenity value, or scientific interests by deviation; provided that this can be done without using too many angle towers, i.e. the more massive structures which are used when lines change direction.
Rule 3	Other things being equal, choose the most direct line, with no sharp changes of direction and thus with fewer angle towers.
Rule 4	Choose tree and hill backgrounds in preference to sky backgrounds wherever possible; and when the line has to cross a ridge, secure this opaque background as long as possible and cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees.
Rule 5	Prefer moderately open valleys with woods where the apparent height of towers will be reduced, and views of the line will be broken by trees.
Rule 6	In country which is flat and sparsely planted, keep the high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration or 'wirescape'.
Rule 7	Approach urban area through industrial zones, where they exist; and when pleasant residential and recreational land intervenes between the approach line and the substation, go carefully into the comparative costs of the undergrounding, for lines other than those of the highest voltage.

## Horlock Rules

- 2.6.4 National Grid devised the Horlock Rules in 2003, and these were subsequently updated in 2006 (National Grid, 2006). The Horlock Rules provide guidelines for the siting and design of new substations, or substation extensions, to avoid or reduce the environmental effects of such developments. In summary, like the Holford Rules, they facilitate consideration of environmental and amenity considerations within the design and siting of new substation infrastructure.
- 2.6.5 The Horlock Rules contain the following guidelines in relation to siting which have been adopted in the development of the Project:
- *'Overall System Options and Site Selection'*
    - *In the development of system options including new substations, consideration must be given to environmental issues from the earliest stage to balance the technical and capital cost requirements for new developments against the consequential environmental effects to keep adverse effects to a reasonably practicable minimum*
  - *Amenity, Cultural or Scientific Value of Sites*



- *The siting of new National Grid substations, sealing end compounds and line entries should as far as reasonably practicably seek to avoid altogether internationally and nationally designated areas of the highest amenity, cultural or scientific value by the overall planning of the system connections*
- *Areas of local amenity value, important existing habitats and landscape features including ancient woodland, historic hedgerows, surface and ground water sources and nature conservation areas should be protected as far as reasonably practicable*
- *Local Context, Land Use and Site Planning*
  - *The siting of substations, extensions and associated proposals should take advantage of the screening provided by landform and existing features and the potential use of site layout and levels to keep intrusion into surrounding areas to a reasonably practicable minimum*
  - *The proposals should keep the visual, noise and other environmental effects to a reasonably practicable minimum*
  - *The land use effects of the proposal should be considered when planning the siting of substations or extensions*
- *Design*
  - *In the design of new substations or line entries, early consideration should be given to the options available for terminal pylons, equipment, buildings and ancillary development appropriate to individual locations, seeking to keep effects to a reasonably practicable minimum*
  - *Space should be used effectively to limit the area required for development consistent with appropriate mitigation measures and to minimise the adverse effects on existing land use and rights of way, whilst also having regard to future extension of the substation*
  - *The design of access roads, perimeter fencing, earthshaping, planting and ancillary development should form an integral part of the site layout and design to fit in with the surroundings*
- *Line Entries*
  - *In open landscape especially, high voltage line entries should be kept, as far as possible, visually separate from low voltage lines and other overhead lines to avoid a confusing appearance*
  - *The inter-relationship between pylons and substation structures and background and foreground features should be studied to reduce the prominence of structures from main viewpoints. Where practicable the exposure of terminal pylons on prominent ridges should be minimised by siting pylons against a background of trees rather than open skylines’.*

# Abbreviations

Abbreviation	Full Reference
AONB	Area of Outstanding Natural Beauty
CNP	Critical national priority
CSE	Cable Sealing End
DCO	Development Consent Order
DESNZ	Department for Energy Security and Net Zero
EIA	Environmental Impact Assessment
ES	Environmental Statement
ESO	Electricity System Operator
kV	Kilovolt
NERC Act	Natural Environment and Rural Communities Act 2006
NESO	National Energy System Operator
NETS	National Electricity Transmission System
NSIP	Nationally Significant Infrastructure Project
NPPF	National Planning Policy Framework
NPS	National Policy Statement
Ofgem	Office of Gas and Electricity Markets
SNCB	Statutory Nature Conservation Bodies

# Glossary

Term	Description
Ancient woodland	Land that has been continually wooded since at least 1600 in England. Regarded as 'irreplaceable habitat' in national planning policy and guidance. Ancient woodland greater than 2 ha is recorded on the Natural England Ancient Woodland Inventory.
Appropriate Assessment	Within Habitats Regulations Assessment, Appropriate Assessment is the second stage of the assessment process to assess potential impacts of a plan, programme or project, alone or in combination, on the integrity of a Natura 2000 site (i.e. Special Protection Area, Special Area of Conservation and/or Ramsar site). See also 'Habitats Regulations Assessment'.
Aspect	A component of a topic considered within the assessment, for example water voles (aspect) are covered within biodiversity (topic).
Biodiversity	The variability among living organisms from all sources including terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part: this includes diversity within species, between species and of ecosystems.
Conservation Area	An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance as defined in s69(1)(a) in the Planning (Listed Building and Conservation Areas) Act 1990.
Development Consent Order	A statutory instrument which grants consents and other rights to build a Nationally Significant Infrastructure Project, as defined by the Planning Act 2008.
Electricity Act	The Electricity Act 1989 provided for the privatisation of the electricity supply industry. The act established a licensing regime and a regulator (Ofgem).
Environmental Impact Assessment (EIA)	An assessment of the likely effects of a development project on the environment, which is reported in an Environmental Statement that is publicised and consulted on and taken into account in the decision on whether a project should proceed.
Environmental Statement (ES)	The main output from the EIA process, an ES is the report required to accompany an application for development consent (under the Infrastructure Planning (EIA) Regulations 2017) to inform public and stakeholder consultation and the decision on whether a project should be allowed to proceed. The EIA

Term	Description
	Regulations set out specific requirements for the contents of an ES for Nationally Significant Infrastructure Projects.
Environmental topic	A subject area covered within the EIA, for example landscape and visual or biodiversity.
Habitats Regulations Assessment	The process by which plans and projects are assessed as to whether they are likely to have a significant effect on a European site either alone or in combination with other plans or projects, under the Conservation of Habitats and Species Regulations 2017 (as amended).
Historic environment	All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.
Historic landscape	The current landscape, whose character is the result of the action and interaction of natural and/or human factors.
Horlock Rules	The Horlock Rules provide guidelines for the siting and design of new substations, or substation extensions, to avoid or reduce the environmental effects of such developments.
Holford Rules	The Holford Rules are a series of overhead line routeing guidelines first developed in 1959 by Lord Holford, adviser to the then Central Electricity Generating Board. They were reviewed in the 1990s by National Grid. The rules are not published as a single work but they are referred to in a number of planning publications including the National Policy Statement for Electricity Networks Infrastructure (EN-5), Visual Amenity Aspects of High Voltage Transmission by George A. Goulty (1989), and Planning Overhead Power Line Routes by RJB Carruthers (1987) Research Studies Press Ltd, Letchworth.
Local Planning Authority	The public authority whose duty it is to carry out specific planning functions for a particular area.
National Grid Electricity System Operator	National Grid Electricity System Operator controls the movement of electricity around the country, transporting power from generators (such as wind farms) to local distribution network operators. It does not distribute electricity to individual premises, but its role in the wholesale market is vital to ensuring a reliable, secure and quality supply to all. From 1 October 2024 the National Grid Electricity System Operator (ESO) became the National Energy System Operator (NESO), a new public body independent from National Grid.

Term	Description
National Landscape (an Area of Outstanding Natural Beauty)	Formally designated under the National Parks and Access to the Countryside Act of 1949 to protect areas of the countryside of high scenic quality that cannot be selected for National Park status due to their lack of opportunities for outdoor recreation (an essential objective of National Parks). As of November 2023, all AONBs became 'National Landscapes'. This reflects ambitions for the areas to play a key part in the international '30 by 30' commitment (to protect and conserve a minimum of 30% of land and sea for biodiversity by 2030).
National Planning Policy Framework	The National Planning Policy Framework sets out the government's planning policies for England and how these should be applied. The Planning Practice Guidance to support the framework is published online and regularly updated.
Nationally Significant Infrastructure Project	Typically, a large-scale development of national importance that requires development consent from the Secretary of State, under the Planning Act 2008.
Scoping	Scoping is the process of determining the content and extent of matters that should be covered in the Environmental Impact Assessment.
Scoping Report	Report determining the content and extent of matters that should be covered in the Environmental Impact Assessment.
Transmission line	A National Grid overhead line which transmits electricity between National Grid's substations. Power is transmitted at high voltages (275 kV or above) between power stations where it is generated and the local electricity supply networks of the regional Distribution Network Operators where it is transformed to lower voltages (132 kV or below) for supply via distribution lines to local communities.
Water Framework Directive	The Water Framework Directive (2000/60/EC) commits European Union member states to achieve good qualitative and quantitative status of all water bodies. It is transposed into law in England and Wales via The Water Environment (Water Framework Directive) (England and Wales) 2017 Regulations, which were retained via the European Union (Withdrawal) Act 2018.



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National Grid plc  
National Grid House,  
Warwick Technology Park,  
Gallows Hill, Warwick.  
CV34 6DA United Kingdom

Registered in England and Wales  
No. 4031152  
[nationalgrid.com](http://nationalgrid.com)