



Planning Inspectorate

North Humber to High Marnham - EN020034

National Grid Electricity Transmission

Section 51 advice regarding draft application documents

Issued on 17 June 2026

On 1 May 2026, National Grid Electricity Transmission submitted the draft documents listed in the tables below for review by the Planning Inspectorate as part of its ['Pre-application Service'](#).

The advice recorded in the tables below relates solely to matters raised from the Planning Inspectorate's review of the draft application documents. The advice is limited by the maturity of the documentation provided by the applicant and the time available for consideration and is raised without prejudice to the acceptance decision, the decision about admission to the fast track procedure (where relevant) or the final decision about whether development consent should be granted.

General

Ref No.	Comment or question
1.	<p>The attention of the applicant is drawn to the value of providing fully accessible documentation, which is in conformity with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018, the Web Content Accessibility Guidelines (WCAG) 2.2 AA accessibility standard and government accessibility requirements. For example, alternative text should be included for figures included within documents and the document title field of documents should be populated to assist screen reader users.</p>
2.	<p>The Inspectorate notes that footers for the provided documentation do not contain the document name. For large documents, including the document name will assist parties in document identification when reviewing multiple documents at the same time. The applicant may wish to consider the addition of the document name in the footer shown on each page for ease of use of the documents, including the funding statement, by parties in a potential future examination.</p>
3.	<p>The Inspectorate notes that the document title field has not been populated for the documents submitted for draft document review. As the content and population of this field is helpful for users of screen readers and the accessibility of the document, the applicant should ensure that this field is completed when documents are created and that this information is incorporated within the finalised document submitted.</p>
4.	<p>The applicant will be aware of the numbers of Relevant Representation submissions that the Inspectorate has received on recent National Grid cases and is no doubt preparing sufficient resources to deal with a similar number on this case, including the potential for high numbers of Artificial Intelligence (AI) generated submissions. The Examining Authority, if appointed, will expect to receive the applicant's responses to Relevant Representations at a very early stage in the examination, and it should be noted that it will expect responses to Affected Persons to be particularly focused on the representations made by Affected Persons who maintain objections to the exercising of Compulsory Purchase and / or temporary possession powers over land they own, or have an interest in.</p>

Draft development consent order (DCO)

Ref No.	Article/ Schedule/ Requirement	Comment or question
1.	General	The Inspectorate notes that the document title states "SI/SR Template" as this is what is entered into the document title field. The applicant may wish to review and amend the document title field to refer to the title of the draft DCO.
2.	Contents	The Inspectorate recognises that the draft Development Consent Order (DCO) is a document in the process of being developed, but notes that none of the schedules listed in the contents list (schedules 1 to 16) have been included in the version of the order provided for review. Consequently, the Inspectorate is not in a position to be able to comment on the content of these schedules including the authorised development provisions set out in schedules, the requirements proposed, amendment of local legislation, protective provisions or certified documents.
3.	Article 9 and Article 11	The Inspectorate notes the potential for duplication between Article 9 and part of Article 11 as noted by the applicant. The applicant may wish to review and consider whether any value results from duplication of provisions or whether a more streamlined approach would be beneficial to a potential future examination.
4.	Article 25	The applicant may want to consider whether this article needs to be included and if they remain of the opinion that it should be included it will be necessary for the applicant to demonstrate why it should be included, with evidence to support the likelihood of encountering human remains. Recent DCO decisions suggest that the Secretary of State (SoS) may remove this article without such evidence. The applicant may wish to refer to previous decision letters issued by the SoS since Longfield Solar Farm to understand the rationale and approach of the SoS for the Department for Energy Security and Net Zero.

Draft DCO explanatory memorandum

Ref No.		Comment or question
1.	Article 35(1)	The Inspectorate has noted that the draft DCO provides for a seven-year timescale. The applicant will need to explain why a seven-year timeframe is necessary in this case. The current justification for this within the Explanatory Memorandum (EM) appears to lack sufficient detail for an Examining Authority to find it satisfactory; the precedents cited by the applicant in the EM could be seen to not really be comparator projects and may not assist an Examining Authority's reasoning or conclusions on the justification of this timeframe for this specific case.

Draft Crown Land Plan

Ref No.	Plan Name and Ref	Comment or question
1.	Crown Land Plan - Section B (Sheet 1 of 1)	The Inspectorate notes the lack of cut lines being shown on the sample Crown Land Plan – Section B. The applicant may wish to ensure that cut lines for sheets are shown as well as section boundaries for ease of use by parties to a potential future examination.
2.	Crown Land Plan - Section B (Sheet 1 of 1)	The Inspectorate has noticed a possible misalignment between the plot boundaries for Crown Land within the course of the River Ouse and the riverbanks visible according to the background mapping. The applicant may wish to review the Crown Land Plan and ensure it is confident that it is certain that the plots shown accurately reflect the situation in terms of the extent of ownership and the features shown in background mapping and on the ground.

Draft Land Plan

Ref No.	Plan Name and Ref	Comment or question
1.	General	<p>The Inspectorate notes the colours of plots used on the Land Plan, uses multiple colours and these do not necessarily follow the conventions frequently used for Development Consent Order applications.</p> <p>The government's guidance related to the procedures for compulsory acquisition (2013) states that the colouring to be used or any other method for denoting all land to be compulsorily acquired, and any replacement land, on the land plan(s) is at the discretion of the applicant. However, the guidance goes on to state (at para 3 of Annex C) that where "it is decided to use colouring, the long-standing convention (without statutory basis) is that land proposed to be acquired is shown pink, land over which a new right would subsist is shown blue, and replacement land is shown green". Owing to this long-standing convention, many parties who are frequently consulted on applications, and Examining Authorities, are arguably used to this colour-coding.</p> <p>The applicant may wish to review their approach to ensure that any colour-coding or shading / hatching used (if presenting plans in black and white) is consistent and clearly denotes the land plots required for, or affected by, the proposed development in respect of proposed compulsory acquisition or any right to use land, the proposed extinguishment of easements, servitudes and other private rights, and any affected special category land and replacement land.</p>
2.	2.3 Land Plans - Section A (Sheet 1 of 5)	<p>The Inspectorate has noticed differences between the background mapping used on the Land Plan and the Works Plan. The background mapping used for the Works Plans reflects changes resulting from the A164 and Jock's Lodge junction improvement scheme, but these changes are not reflected in the background mapping used in 2.3 Land Plans - Section A (Sheet 1 of 5). The applicant may wish to review their plans and ensure that there is consistency in the background mapping used on all plans submitted as part of an application and that the information contained in the plans is as up to date as possible. This point is also raised under Ref No. 1 of the comments on the Draft Works Plan.</p>
3.	2.3 Land Plans - Section A (Sheet 1 of 5)	<p>The applicant may wish to consider the relative placement in relation to each other of the sheets of the Land Plan. Currently it is noticed that on Sheet 1 of 16 within Section A there is a cut line between Sheet 1 and Sheet 2 representing an overlap of approximately half the height of the sheet. This also leads to an overlap of the cut line and Inset 4 – Section A, which could result in a lack of clarity for parties to a potential future</p>

Draft Land Plan

Ref No.	Plan Name and Ref	Comment or question
		examination. The applicant may wish to move the cut line between sheets or to freeze the cut line from Inset 4 – Section A. A similar situation can be observed with the cut line for Sheet 3 and Inset 5 – Section A.
4.	2.3 Land Plans - Section A (Sheet 1 of 5) and 2.3 Land Plans - Section B (Sheet 1 of 8)	Section A Sheet 1 and Section B Sheet 1 can be a little less than clear in areas with a large number of plot numbers being labelled as is the case around the label for A1-016 which has the inset line for Inset 3 – Section A overlapping with the label box. The applicant may wish to review the appearance of the plan to ensure that the labelling and inset lines as well as plot boundaries, background mapping and cut lines are clearly spaced and easily distinguished to assist parties to a potential future examination.
5.	2.3 Land Plans - Section C (Sheet 1 of 5)	The Inspectorate has noted that the plan title in the paper space states Section B (Sheet 1 of 5) for plan Section C (Sheet 1 of 5). The applicant may wish to review all sheets to ensure consistency and accuracy in document titles.

Draft Special Category Land Plan

Ref No.	Plan Name and Ref	Comment or question
1.	General	The Inspectorate has noticed that the layering of information within the plans may make the plans harder to read than they may otherwise be. Some of the labelling from the background mapping is obscured by the order limits or the shown land plots. The applicant may wish to review the plans and consider whether changes to the presentation and layer ordering may be beneficial to parties using the Special Category Land Plan.

Draft Works Plan

Ref No.	Plan Name and Ref	Comment or question
1.	2.4 Works Plans - Section A (Sheet 1 of 16)	The Inspectorate has noticed differences between the background mapping used on the Land Plan and the Works Plan. The background mapping used for the Works Plans reflects changes resulting from the A164 and Jock's Lodge junction improvement scheme, but these changes are not reflected in the background mapping used in 2.3 Land Plans - Section A (Sheet 1 of 5). The applicant may wish to review their plans and ensure that there is consistency in the background mapping used on all plans submitted as part of an application and that the information contained in the plans is as up to date as possible. This point is also raised under Ref No. 1 of the comments provided on the Draft Land Plan.

Draft consultation report, including section 42 consultee list

Ref No.	Paragraph/ Section	Comment or question
1.	Section 4	The Inspectorate draws the applicant's attention to box 33 of the section 55 acceptance checklist in use as of May 2026 and the reference to whether the applicant had regard to statutory guidance 'Planning Act 2008: Application form guidance'. Section 4 contains information on the guidance followed by the applicant but does not appear to be a clear part of this section explicitly covering the guidance mentioned in box 33 of the section 55 acceptance checklist. The applicant may wish to consider the best place to outline their regard to this guidance.
2.	Table 4.1	The Inspectorate notes that in relation to section 47 compliance the draft consultation report table 4.1 states "Newark and Sherwood District Council was identified after the initial SoCC consultation as a host authority. On 5 December 2024, the SoCC was issued to Newark and Sherwood District Council via email, and they were given until 3 January 2024 to return their comments, a period of 28 days (beginning with the day after the day

Draft consultation report, including section 42 consultee list

Ref No.	Paragraph/ Section	Comment or question
		<p>on which the materials were received).” However, Newark and Sherwood District Council is not identified in other documents such as the draft Planning Statement as a host local authority. It does not appear to be clear why this authority was identified and whether this reason for host local authority status applies in the scheme to be submitted as it is currently formulated. The applicant may wish to review documents to ensure consistency and also provide clear reasoning for any change of circumstances with specific consultees applicable to (or not applicable) this application.</p>
3.	<p>Appendix C – List of Stage One Consultees</p>	<p>The Inspectorate notes the provision of a list of stage one consultation consultees within the draft consultation report. The applicant may wish to review this list to check that this information is correct and that a distinction is made between parties and the geographical reach of organisations. For example, it is noted that reference is made to Retford Parish Council (town), which it is assumed is relating to the town of Retford, which remains unparished and has charter trustees rather than a Parish Council. There are also references to Parish areas as Parish Councils such as Grove Parish Council (part of Headon cum Upton, Grove and Stokeham Parish Council), which is assumed is referring to a parish of Grove which it is presumed has been grouped and administered at parish level by a Grouped/Shared Parish Council of Headon cum Upton, Grove and Stokeham Parish Council. Consequently, the applicant may wish to review and amend as appropriate.</p>
4.	<p>H.5 Non-Prescribed Consultees</p>	<p>The Inspectorate notes the provision of a list of Non-Prescribed Consultees in the Consultation Report. Whilst it is welcome that there has been an attempt to engage beyond the statutory consultees, the applicant should ensure that parties have not been included in error. For example, there is reference to a consultee of Brigg and Immingham Parish Council, which is assumed is intended to be references to Brigg Town Council and Immingham Town Council, which are separate authorities. There also appear to be references to Gainsborough Parish Council (commonly referred to as Gainsborough Town Council), Newark Parish Council (commonly referred to as Newark Town Council), and Goole and Pocklington Parish Council which is believed to be two separate parish councils. The applicant may wish to review this list to check that this information is correct and amend as appropriate.</p>

Draft consultation report, including section 42 consultee list

Ref No.	Paragraph/ Section	Comment or question
5.	Appendices I, J and K	It is acknowledged that the content of Appendices I, J and K have not been included in this submission and consequently the Inspectorate is unable to comment on the presentation and information contained with this content.

Draft habitats regulations assessment (HRA) report

Ref No.	Paragraph/ Section	Comment or question
1.	n/a - Overall comments	<p>The draft HRA Report is only populated up until the end of the screening stage. The Inspectorate is therefore only able to comment up until that point of the assessment process. It recommends that the applicant engages with Natural England with a draft HRA Report that includes Stage 2 conclusions, even if they are in draft form.</p> <p>The Inspectorate recommends the applicant includes a table in the Stage 2 assessment identifying any mitigation measures relied upon for the HRA, including details of any outline control document, the measures are secured within and the relevant DCO requirement(s) which secure their implementation.</p>
2.	Executive summary	It would be beneficial to summarise the sites and qualifying features for which likely significant effects (LSEs) were identified.
3.	Paragraph 1.2.2 (and throughout the draft HRA Report)	The draft HRA Report opts to use the term 'habitats site' rather than 'European site' (although references to European sites remain in some instances). Although a terminology issue, the Inspectorate considers the term 'European site' to be more appropriate. The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations 2017) use the terminology 'habitats site' sparingly, referencing the Water Industry Act 1991 for its meaning. The Water Industry Act 1991 states that 'habitats site' means a European site within the

Draft habitats regulations assessment (HRA) report

Ref No.	Paragraph/ Section	Comment or question
		meaning of regulation 8 of the Habitats Regulations 2017. The Habitats Regulations 2017 uses the terminology 'European site', and regulation 63 requires an assessment of implications for European sites.
4.	Paragraph 1.2.4	A scoping opinion is adopted in relation to the scope of an Environmental Statement and should not be construed as advice on the scope and extent of an HRA.
5.	HRA process	The HRA process is described in several places in the introductory sections of the HRA Report, including paragraph 1.2.3, paragraphs 2.1.5 to 2.1.6 and image 3.1.5. The Inspectorate considers there are opportunities available to minimise duplication.
6.	Section 3.5 – In-combination scope	<p>It is unclear whether in-combination effects would be considered at the screening stage. An in-combination assessment is not required where a LSE is identified from the project alone. However, the assessment should consider the potential for in-combination LSEs to result where a LSE from the proposed development alone has been excluded. LSEs could result from the combination of numerous not-significant impacts; this is alluded to at paragraph 3.4.2, although it is unclear whether this is referencing HRA Stage 1 (screening) or Stage 2 (appropriate assessment). For the avoidance of doubt, the Inspectorate considers it reasonable to exclude a plan or project from the assessment where its contribution can be demonstrated to be negligible, however this should be explained within the report.</p> <p>For clarity, the in-combination assessment should consider the sum of all effects of the proposed development plus all identified plans or projects on a given qualifying feature/impact pathway. It should not consider the proposed development plus each identified plan or project in turn.</p>
7.	Table 4.1 – summary of ornithological field surveys	Through the Tide Counts (TTCs) were undertaken between June 2022 to March 2023. This survey data is more than three years old. The application documents should demonstrate that this survey data is still relevant. The applicant is also advised to seek agreement with Natural England that this survey data is valid for use.

Draft habitats regulations assessment (HRA) report

Ref No.	Paragraph/ Section	Comment or question
8.	Table 5.1 – disturbance of qualifying features	Table 5.1 identifies the potential for disturbance from vibration. No further reference is made to vibration. The HRA Report should confirm whether there would be a LSE from vibration to any qualifying features of any European site.
9.	Table 5.1 and paragraph 7.7.1	Table 5.1 and paragraph 7.7.1 refer to otter. No European sites with otter as a qualifying feature have been identified in the draft HRA Report therefore it is recommended these references are omitted.
10.	Section 6 – relevant habitats sites	<p>Whilst the distance of each site from the proposed development is detailed in table 7.3, it would be useful to include that information in section 6 to provide location context in the introduction to the sites.</p> <p>Paragraph 6.1.4 states that conservation objectives for all identified sites have been obtained. This should be clarified as Appendix D is entitled “Conservation objectives for habitats sites taken to the Stage 2: Assessment”.</p>
11.	Section 7.2 - direct loss of/damage to qualifying habitat	It is recommended that paragraph 7.2.6 bullet point one confirms the site which would be oversailed.
12.	Paragraph 7.7.4 – noise disturbance	The applicant is advised to seek to agree with Natural England the parameters identified in paragraph 7.7.4 specifically for this project.

Draft habitats regulations assessment (HRA) report

Ref No.	Paragraph/ Section	Comment or question
13.	Sections 8 – LSE screening	<p>It is not clear from section 8 which qualifying feature(s) of each site is screened in, as the sites are screened in as a whole. The screening section of the HRA Report should confirm the qualifying features screened in or out for each impact pathway. If the current approach is retained, it must be assumed that there is a LSE for every qualifying feature of any site screened in and therefore they should all be assessed accordingly in the Stage 2: Appropriate Assessment section (section 10).</p> <p>The screening section (8) and the outline for the Stage 2 assessment (section 10) are presented on an impact pathway basis. From experience on previous projects, the Inspectorate considers that a site-by-site approach to assessment is clearer as it facilitates an understanding of the impacts on a site as a whole. It is therefore essential to retain a table equivalent to table 7.3 for this understanding.</p>
14.	Paragraph 8.2.3 – loss of functionally linked land (FLL) (construction)	<p>It would be useful for the HRA Report to clearly identify the location and extent of the FLL to be potentially affected. References to whole Environmental Statement chapters are not useful given the length of these chapters and require readers to spend extensive time finding the relevant information.</p>
15.	Paragraphs 8.2.16 to 8.2.20 – airborne pollution (construction)	<p>This section of the HRA Report should also consider LSEs from dust deposition, which is identified as an impact pathway in section 7.5.</p>
16.	Paragraph 8.2.26 –	<p>The conclusion of no LSE relies on no additional water supplies being required to meet the potable water demand, beyond existing consents and licensed volumes. The applicant should demonstrate that existing consents and licensed volumes are sufficient to meet their construction phase potable water needs.</p>

Draft habitats regulations assessment (HRA) report

Ref No.	Paragraph/ Section	Comment or question
	potable water (construction)	
17.	Paragraphs 8.2.27 to 8.2.28 – dewatering (construction)	<p>A LSE from hydrological changes due to dewatering is screened out on the basis that a groundwater risk assessment would be undertaken once the requirement for and potential locations of any dewatering is known. This would determine any mitigation that may be required.</p> <p>The Inspectorate assumes that the groundwater risk assessment would be undertaken post consent and considers it premature to screen out a LSE at this stage, particularly noting the acknowledgment that mitigation may be required. In line with the precautionary principle, the Inspectorate advises this pathway should be progressed to Stage 2, with a worst-case assessment undertaken and all assumptions clearly identified. Any standard best practice measures to be minimise and manage effects should be identified in the Register of Environmental Actions and Commitments (REAC) and appropriately secured.</p>
18.	Paragraphs 8.2.29 to 8.2.30 – connection of aquifers (construction)	<p>A LSE from hydrological changes due to the potential connection of aquifers is screened out on the basis that a hydrogeological risk assessment and a foundation works risk assessment would be undertaken once proposed foundation solutions and trenchless crossing techniques are known (in accordance with the REAC). This would determine any mitigation that may be required.</p> <p>The Inspectorate assumes that the hydrogeological risk assessment and a foundation works risk assessment would be undertaken post consent and considers it premature to screen out a LSE at this stage, particularly noting the acknowledgment that mitigation may be required. In line with the precautionary principle, the Inspectorate advises this pathway should be progressed to Stage 2, with a worst-case assessment undertaken and all assumptions clearly identified. Any standard best practice measures to be minimise and manage effects should be identified in the REAC and appropriately secured.</p>
19.	Paragraphs 8.2.36 to 8.2.45 –	<p>Thorne and Hatfield Moors SPA is missing from the bullet point list in paragraph 8.2.36.</p> <p>There are several potential sources of disturbance including noise, the visual presence of workers and machinery and lighting. The Inspectorate understands that LSEs are screened in for each of these sources for</p>

Draft habitats regulations assessment (HRA) report

Ref No.	Paragraph/ Section	Comment or question
	disturbance of qualifying species (construction)	<p>qualifying features within the Humber Estuary SPA and Ramsar site itself and at FLL, and only at FLL for qualifying features of Lower Derwent Valley SPA and Ramsar site. However, further clarity on this matter should be provided.</p> <p>Paragraph 8.2.44 confirms that no in-channel works are proposed within the Humber Estuary SAC. It is unclear whether any construction activities on either side of the river (eg piling of foundations) would take place which could result in noise or vibration impacts within the SAC. This should be confirmed within the HRA Report.</p> <p>It is recommended that lighting plans be submitted to support any assessment of effects from lighting. The applicant should seek to agree with Natural England the need for a detailed lighting assessment to support the Stage 2 assessment.</p>
20.	Paragraph 8.3.3 – loss of FLL (operation and maintenance)	<p>The loss of FLL has been identified as a construction phase impact in paragraph 8.2.5. It is unclear why it has also been identified for the operational and maintenance phase, although the Inspectorate assumes this is to demonstrate the initial loss which occurs during construction would continue throughout the operation and maintenance phase. If this is the case, the Inspectorate advises that the impact is assessed within the project phase when the impact would occur only (ie construction), with a clear explanation of the duration of impact and effect. However, if further loss of FLL is anticipated during the operation and maintenance phase this should be clearly explained and assessed.</p>
21.	Paragraph 8.3.14 – airborne pollution (operation and maintenance)	<p>The HRA Report should confirm anticipated operation and maintenance phase traffic movements to demonstrate that they will be below the Institute of Air Quality Management screening criteria.</p>

Draft habitats regulations assessment (HRA) report

Ref No.	Paragraph/ Section	Comment or question
22.	Section 9 - In-combination	A short-list of developments with the potential for in-combination effects has not been provided at this stage. The proposed 400 kV Birkhill Wood Substation and 400 kV High Marnham Substation subject to separate planning applications should be included in the assessment.
23.	Table B.1 – summary of impact pathways for each habitats site and stage of the project	<p>The aim of summary tables should be to quickly and easily understand the assessment conclusions for a site as whole, without the need for cross referencing across pages. The Inspectorate considers that summary table B.1 is difficult to navigate.</p> <p>Taking loss of FLL of the Humber Estuary SPA as an example, this is identified as a potential pathway on page B-1, but it is not clear if there is a LSE, and if so, for which qualifying features. Navigating to page B-12, loss of FLL appears under the 'Appropriate Assessment' stage for all qualifying features and therefore it can be assumed it that there is a LSE for this impact pathway. There is therefore the need to navigate across pages to understand the screening conclusion.</p> <p>The conclusions of the Appropriate Assessment stage are also not identified within the table.</p> <p>The summary tables should also accurately reflect the conclusions set out in the report text. There are several discrepancies in the draft HRA Report, as follows:</p> <ul style="list-style-type: none"> • LSEs are identified for Lower Derwent Valley SPA and Ramsar site (eg loss of functionally linked land at paragraph 8.2.5 and disturbance at paragraph 8.2.40), however this site does not appear in the Appropriate Assessment stage of table B.1 (page B-12). • A LSE on Humber Estuary SAC, SPA and Ramsar site is identified for waterborne pollution during construction (paragraph 7.4.4). However, this impact pathway does not appear in the Appropriate Assessment stage of table B.1 (page B-12). <p>The Inspectorate recommends the summary table is structured on a site basis rather than HRA Stage - project phase - impact pathway basis. Assessment conclusions are then immediately evident for a site as a whole, ie with all impact pathways collated for each site. It also makes it easier to understand whether a pathway has</p>

Draft habitats regulations assessment (HRA) report

Ref No.	Paragraph/ Section	Comment or question
		<p>been screened in or out without having to navigate to separate pages. For an example, see tables A.1 to A.4 of the Sealink Report on the Implications for European Sites.</p> <p>The Inspectorate also notes the impact pathway ‘Direct loss of/damage to qualifying habitat’ during construction is not included in the summary table, presumably as it was scoped out in section 7. In addition, all impact pathways considered have been ‘scoped out’ for Thorne Moor SAC and Hatfield Moor SAC and are not included within the table. The Inspectorate advises that all sites and impact pathways identified in the HRA Report text are included either within the summary table themselves or in an introductory sentence to the table to enable a quick snapshot understanding of the entire assessment.</p> <p>Please note that if summary tables are difficult to navigate and understand, revised versions may be requested during an examination.</p>
24.	<p>Paragraph 8.1.6 - decommissioning</p>	<p>Paragraph 8.1.6 states:</p> <p><i>“The design life of the Project is at least 80 years but with regular maintenance is likely to extend further. At the time that decommissioning would take place, the regulatory framework, good industry practices and the future baseline could have altered. At the point where the Project requires decommissioning, National Grid would consider and implement an appropriate decommissioning strategy, taking account of good industry practice, its obligations to landowners under the relevant agreements, and all relevant statutory requirements. As such, decommissioning is excluded from the HRA.”</i></p> <p>In the absence of a detailed draft DCO at this stage, it is not clear whether or how decommissioning would take place. If decommissioning is being provided for within the DCO, then those effects will need to be assessed. The Inspectorate accepts that this may be a high level assessment at this stage, however effects from decommissioning activities should not be overlooked. If decommissioning is not provided for within the DCO and will therefore require a separate consent at the time, then the Inspectorate agrees an assessment of effects is not required in this HRA.</p>

Draft environmental statement (ES) project description chapter(s)

Ref No.	Paragraph/ Section	Comment or question
1.	Paragraph 4.3.14	The applicant is advised to secure the commitment to using temporary materials from other construction projects, where possible, through an appropriate control document such as the REAC.
2.	Paragraphs 4.4.11 to 4.4.13	If the technological properties of conductor types have been taken into account in any assessment (for example the noise assessment), their use should be secured through an appropriate control document.
3.	Paragraph 4.7.10 and 4.7.91	Paragraphs 4.7.10 and 4.7.91 imply that all access tracks would be re-instated, however section 4.11 and figure 4.1 identify maintenance access routes. This should be clarified to avoid ambiguity.
4.	Paragraph 4.7.28 and ES Figure 4.2 – Construction traffic routes	It would be useful for the ES to set out how the ‘all vehicles’ and ‘light vehicles’ construction traffic routes are to be secured. Relevant outline control document(s) should provide definitions for these classes of vehicles.
5.	Paragraph 4.7.33	It is unclear how it would be determined that pre-construction field drainage would be considered ‘appropriate’. This should be clarified.
6.	Paragraph 4.7.93	The assumption that no new temporary or permanent abstractions would be required to meet the water supply needs of the project should be supported with evidence. As noted in the Inspectorate’s comments on the draft HRA, the applicant should demonstrate that existing consents and licensed volumes are sufficient to meet their construction phase potable water needs.
7.	Section 4.7	Section 4.7 does not provide details on the works required for the line entry connections required at the two substations. This should be included in the submitted ES.

Draft environmental statement (ES) project description chapter(s)

Ref No.	Paragraph/ Section	Comment or question
8.	Section 4.8 and 4.9	The Inspectorate anticipates that the likely number and nature of vehicle movements associated with the construction, operation and maintenance phases of the proposed development would be established in a separate Transport Assessment. It would be useful for the project description chapter to provide an overview of these movements.
9.	Section 4.10	<p>In accordance with the applicant's scoping report, decommissioning is scoped out of the assessment on the basis that <i>"At the point where the Project requires decommissioning, National Grid would consider and implement an appropriate decommissioning strategy taking account of good industry practice, its obligations to landowners under the relevant agreements and all relevant statutory requirements."</i> Nevertheless, the Inspectorate recommends that a summary of the anticipated activities associated with the decommissioning phase is included within the project description in order to understand the complete life cycle of the proposed development.</p> <p>If decommissioning is not provided for within the DCO and will therefore require a separate consent at the time, then the Inspectorate agrees an assessment of effects is not required in this ES.</p>
10.	Section 4.11	It would be useful for each route section description to clearly identify the first and final pylon number within the section. For example, for paragraph 4.11.6 to confirm the final pylon number within section A, and paragraph 4.11.24 to confirm the first pylon number in section B.
11.	Paragraph 4.11.4	Paragraph 4.11.4 refers to pylon 4AF37, however the Inspectorate is unable to locate this pylon on figure 4.1. The applicant should ensure that figures accurately reflect the text.
12.	Appendix 4.1 – Indicative pylon schedule	The Inspectorate considers the indicative pylon schedule is a useful, clearly set out document. In the absence of a detailed draft DCO at this stage, it is not clear how pylon heights would be secured. This should be evident in the application documents.

Draft environmental statement (ES) project description chapter(s)

Ref No.	Paragraph/Section	Comment or question
13.	n/a – REAC	The REAC and relevant ES chapters should clearly describe the details of any mitigation measures to be implemented, along with associated monitoring, reporting, and adaptive management.

Draft planning statement

Ref No.	Paragraph/Section	Comment or question
1.	3.2.2	It is not clear of a reason why this paragraph reference is presented in italics when others are not. The applicant may wish to review this document and others to ensure that there is consistency in formatting.
2.	4.2.1	Reference is made to this scheme being located in the "...Yorkshire and Humber, and Midlands region of England." It is noted that this is likely to be intended to read as "...Yorkshire and the Humber, and East Midlands region of England." The applicant may wish to review and amend as appropriate these references within this and other documents within the application for clarity and accuracy.
3.	4.2.2	The Inspectorate notes that the draft planning statement states that "The Project is located within the administrative boundaries of East Riding of Yorkshire Council, North Lincolnshire Council and Bassetlaw District Council (with Nottinghamshire County Council acting as the upper tier authority)." The applicant may wish to review this description and consider if they wish to reframe the description of Nottinghamshire County Council as the upper tier authority due to it also being a host authority, like the other local authorities mentioned to make it clearer that all local authorities listed are host authorities for this project.
4.	4.3	It is noted and recognised that the applicant intends to populate the planning statement with information for each of the project sections at a later date. However, it is noticed that the only placeholder title provided is for Route Section A and that references provided for the remainder of chapter 4 in this feedback may not align with

Draft planning statement

Ref No.	Paragraph/ Section	Comment or question
		the numbering in the final document. The document notes that the description of each section of the Project will be finalised once the development of the Environmental Statement for submission is concluded. The applicant will want to ensure that there is a complete and consistent description for each project section across application documents.
5.	6.2.27	The Inspectorate notes that neighbourhood plans and policies have been identified and listed. There appears to be an inconsistency in the referencing of the authorship of the neighbourhood plans, with some made plans being ascribed to Bassetlaw District Council and others to Neighbourhood Planning Groups/ Neighbourhood Plan Steering Groups and Parishes. The applicant may wish to review and check these references to reassure themselves that a consistent and accurate approach is being taken to this referencing.

Draft book of reference (BoR)

Ref No.	Page/ Plot Ref	Comment or question
1.	General	The structure of the draft book of reference appears to follow the Parts 1 to 5 outlined in the APFP Regulations and the applicant should seek to maintain this as they finalise the document and add the details relating to the parties with an interest in land for this specific project.

Draft statement of reasons (SoR)

Ref No.	Paragraph/ Section	Comment or question
1.	4.1	The Inspectorate has noticed that the Land Plan is referred to as one document, but in terms of the version provided for Draft Document Review the Land Plan is provided as a series of documents covering sections of the route. It is also noticed that a similar approach is being taken to the Works Plan. The applicant may wish to consider the framing in this document or provide additional explanation that plans are provided in separate parts each covering a different section of the route.
2.	Table 5.1	The Inspectorate notes that table 5.1 lists the colours of plots used on the Land Plan, which uses multiple colours and these do not necessarily follow the conventions frequently used for Development Consent Order applications. The applicant may wish to review their approach and consider how the colouring of land plots can be as helpful to potential parties to a future examination.
3.	9.2	It is recognised that this chapter of the draft statement of reasons is not yet populated and is due to be completed prior to the point of submission. The applicant will wish to complete this chapter and also ensure that all placeholder information to be updated is finalised prior to submission.
4.	Appendices	The Inspectorate notes that the appendices are to be populated and is therefore unable to comment on the intended content of these parts of the draft statement of reasons.

Draft funding statement

Ref No.	Paragraph/ Section	Comment or question
1.	General	The Inspectorate notes that no organisational organogram showing the company structure has been provided as part of the funding statement and that there have also not been any full or part financial accounts included or a placeholder provided for such information. The provision of a summary or full annual accounts/report has

Draft funding statement

Ref No.	Paragraph/ Section	Comment or question
		been seen on other funding statements and could assist in evidencing the confidence expressed in the draft Funding Statement on the ability of the applicant to fund or find funding for the project and the financial liabilities resulting from Compulsory Acquisition/Blight claims should the order be made by the Secretary of State. The applicant may wish to consider whether the provision of further evidence of company structure or the financial strength of the applicant would be beneficial to inform a potential future examination and provide an Examining Authority with confidence.
2.	Image 4.1 and Image 7.1	<p>The Inspectorate has noticed that the alternative text (alt-text) for these images appear to be automatically generated and of limited effectiveness as alt text for images within this document. For example, the alt-text provided for image 4.1 in the draft funding statement states “A timeline of a company AI-generated content may be incorrect.” The alt-text for image 7.1 states “A diagram of a project AI-generated content may be incorrect.”</p> <p>Effective alt-text is a consideration for accessible documents, and the applicant is reminded that the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 apply for documents provided on the Find a National Infrastructure Project website and therefore there is an expectation that accessible documents will be provided by the applicant. The applicant may wish to review all images across the suite of application documents and ensure that effective alt-text is provided for all documents throughout a potential future examination process.</p>

Land Rights and Negotiations Tracker

Ref No.	Paragraph/ Section	Comment or question
1.	General	The applicant’s attention is drawn to the identification of Train Operating Companies as Category 1 or Category 2 parties. It may be advisable for the applicant to consider any impacts of the policy of the Department for Transport in relation to the movement of such operations to the public sector from the private sector. The

Land Rights and Negotiations Tracker

Ref No.	Paragraph/ Section	Comment or question
		applicant may wish to consider the approach they would take to explain the rationale for the approach taken to the inclusion of train operating companies within the land rights identified. It is noted that some other applicants have not identified train operating companies within their Book of Reference.
2.	General	The Inspectorate has noticed that the Land Rights and Negotiations Tracker shows that identified Category 1 parties and a number of Category 2 parties are listed as the Heads of Terms Negotiations having not commenced and the remainder of Category 2 and Category 3 parties as not requiring Heads of Terms Negotiations. The applicant may wish to review and provide detail on why these negotiations are either not required or have commenced within their submitted documentation. It does not appear to be clear why negotiations appear to have not commenced with any of these parties
3.	General	The inclusion of a column to cross reference BoR plot numbers with plans is welcome. An Examining Authority would further welcome the inclusion of both Land Plan and Works Plan drawing references which correspond to the plot references in column B in this 'Plan reference number' column.
4.	General	The applicant should be encouraged to include (at as early a stage as possible), either as a separate tab in the Land Rights tracker, or as a stand-alone spreadsheet, a schedule which sets out the progress of Land Rights negotiations and which allows an Examining Authority to easily identify and interrogate the status of negotiations with all APs who might maintain an objection to the exercising of CA/TP powers over land they own, or have an interest in. A draft version of such a schedule would be welcome as early as possible.
5.	General	The columns relating to negotiations with land owners is concerning for an application which is due to be submitted in September. The column relating to Heads of Terms only has the option to filter by 'Heads of Terms negotiations not commenced'. An update on the current status of land rights negotiations would be very helpful.

Issues Tracker

Ref No.	Paragraph/ Section	Comment or question
1.	General	<p>The Inspectorate’s ‘2024 Pre-application Prospectus’ states that the production and maintenance by the applicant of an issues tracker should occur throughout the pre-application stage. The expectation is for applicants to be upfront about issues and who they affect, for the Inspectorate to understand the extent and type of project issues involved, to review the level of progress made, and to help target its advice. The issues tracker should also allow affected statutory bodies and local authorities to review on an equivalent basis and the issues tracking in the document should record their input. The degree of risk associated with each issue identified in the tracker should be allocated a ‘RAG’ (red, amber, green) status and reviewed iteratively as the proposed development progresses through pre-application.</p> <p>While the issues tracker can be a short document setting out high-level information, the applicant’s issue tracker appears to only contain a basic list of topics, with no or limited supporting detail as to the extent of sub-issues involved and the RAG rating for each at this advanced stage of pre-application. It is therefore difficult for the Inspectorate to understand the degree of preparedness of the application and the extent of issues that remain unresolved in discussion with statutory parties.</p> <p>Specifically, there is very limited detail (if any) in the ‘Description of Issue’ column for the reader to understand the extent of the issues involved and their location within or near the site. Topics are restricted to headings only and therefore provide no information as to the particular planning constraints or protected assets that may require bespoke surveys, assessments, and mitigation. For example, the topic ‘Historic Environment’ only states it includes designated and non-designated heritage assets and scheduled monuments but does not name any of the main assets affected by the proposed development, their grading (i.e. whether the proposed development crosses a World Heritage Site or Grade I Listed Building and its Setting), or indicate the proximity of these assets to the proposed development.</p> <p>The ‘Interaction Log’ and ‘Likelihood of resolution’ are also equally short of any useable detail or insights. There is a lack of detail on the extent to which assessment methodologies have been agreed with statutory consultees on a topic-by-topic basis, and the scope of surveys and assessments needed, the stage of completion of the assessments, and what, if any, outstanding areas are causing the ‘amber’ and ‘red’ ratings. In many areas, the Issues Tracker only states that ‘further updates to be provided as the project gets closer to</p>

Issues Tracker

Ref No.	Paragraph/ Section	Comment or question
		<p>DCO application submission'. Given that the applicant is planning to submit its application in September 2026, the issues tracker should be indicating mostly 'green' status at this advanced stage for most of the main issues, as the applicant should have reached agreement with relevant statutory parties on the approaches / baseline information, even if the assessment outputs may be subject to discussion at examination.</p> <p>The applicant is advised to reach agreement with relevant statutory parties on the extent of data and survey work needed before submitting the application, or provide robust reasons for taking a different approach, to facilitate an efficient examination and meet regulatory requirements. Clearer and more comprehensive information on these matters should be included.</p> <p>Moreover, the issues tracker should, where relevant, reflect current examination practice and the standards in made Development Consent Orders for similar applications, when addressing the principle main issues or in undertaking satisfactory assessments.</p> <p>It also appears that no information is included to state whether mitigation measures have been agreed with the statutory parties, or the stage of discussions on these. These matters should be resolved before the submission of the application for 'acceptance'.</p> <p>For example, on Flood Risk, some information as to whether the applicant has reached agreement with the Environment Agency on its flood risk modelling methodology, even if further assessment is ongoing. On construction, information on matters in discussion should be provided, such as reaching agreement on abnormal indivisible load routes and route feasibility, and the details needed on HGV trips to be captured in the Transport Assessment and Outline Construction Traffic Management Plan. On ancient woodland, indication should be given on what remains in terms of the woodland surveys and whether compensatory / mitigation / offset arrangements are in place and are of a satisfactory standard. HRA is rated 'Red', but no information is given as to why and what specific aspects of HRA is causing this rating. The applicant is encouraged to work through its issues tracker at the earliest opportunity to review its contents and provide a suitable level of information to denote the extent of discussions held and agreements reached on the topics with relevant consultees and what work remains outstanding.</p>

Issues Tracker

Ref No.	Paragraph/ Section	Comment or question
2.	Table 1.1	The Inspectorate notes that there is a difference in position over the most appropriate mapping to use to relation to public rights of ways between the applicant and the local authorities. It is also noticed that reference is made to the position of East Riding of Yorkshire Council in row 10 which is stated to be covering the position of Nottinghamshire County Council as an affected stakeholder. The applicant may wish to review this table and ensure it is setting out each issue in the clearest way. The applicant may also wish to consider its rationale for its position on the mapping to be used and ensure that the alternative approach and the rationale for using it as opposed to the mapping requested by the affected stakeholder.
3.	Table 1.1	The Inspectorate notes that there is a recognition of interactions with other projects. It is not necessarily clear how the scope of this issue has been derived in terms of noted projects, and the applicant may wish to make this clearer and consider whether projects at an earlier stage may justify inclusion in this issue within the tracker and consequent reflection within application documentation.