Planning Inspectorate

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To National Grid Electricity Transmission (NGET) Plc

Your Ref:

Our Ref: EN020034

Date: 12 November 2026

By email only

Dear [redacted]

Planning Act 2008 – section 51

Application by National Grid Electricity Transmission (NGET) Plc for an order granting development consent for North Humber to High Marnham

Advice following issue of decision to accept the application for examination

On 13 November 2026 the Planning Inspectorate decided that the application for the above project satisfied the acceptance tests under section 55 of the Planning Act 2008 (PA2008). The Planning Inspectorate's acceptance checklist and the application documents have been published on the project page on the Find a National Infrastructure Project website.

The acceptance checklist can be viewed at https://national-infrastructure-consenting.planninginspectorate.gov.uk/document/EN020034-000140.

In undertaking checks at the acceptance stage, the Planning Inspectorate has made some initial observations in relation to the application. This letter comprises advice to the applicant provided under section 51 of the PA2008 in respect of these initial observations. The applicant should pay attention to its content and consider how appropriate action might be taken in response.

Habitats Regulation Assessment

The Habitats Regulation Assessment (HRA) Report (Document 5.2) rules out an adverse effect on the integrity (AEoI) of the Humber Estuary SPA and Ramsar site from the loss of, or disturbance to users of, functionally linked land (FLL). This is subject to the provision of a 'functionally linked land' mitigation area (the FLLMA) comprising 46 hectare (ha) of alternative foraging habitat within arable farmland for pink footed goose, golden plover, lapwing and curlew. This is noted as commitment ON14 in the HRA Report but contained

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within ON15 of the Register of Environmental Actions and Commitments (REAC) (Document 7.3).

The Inspectorate has identified several aspects of the assessment which would benefit from further information or clarifications prior to the start of examination. These are detailed below.

1) Greylag goose is identified as a species potentially affected in paragraph 9.9.3 of the HRA Report. The applicant is advised to clarify in the HRA Report whether the FLLMA is also intended for use by this species.

2) In Appendix 8.3 to the Chapter 8 of the Environmental Statement (ES) (Document 6.8.A3), the applicant confirms that the FLLMA has not been subject to any phase 1 habitat surveys, however site bird survey data covering the FFLMA has been provided. The applicant is advised to revise the HRA Report to explain how the FLLMA site was chosen, whether it can already be considered to be FLL and why it is ecologically suitable to perform in the way the applicant proposes for several different species.

3) Neither the HRA Report nor the ES provide a rationale or justification for deriving the size of the FLLMA (46ha). The size of the FLLMA should reflect the assessed impact. The applicant is advised to provide a clear and detailed explanation within the HRA Report. In this regard, the applicant is also advised to justify the application of a 500m disturbance buffer for breeding birds when, for example, the disturbance distance for pink-footed goose is over 1km, as detailed in *Disturbance Distances in selected Scottish Bird Species – NatureScot Guidance* (2022).

4) REAC commitment ON15 states that the "*supporting habitat would be made available over the entire construction phase of the Project and, as a maximum, for the lifetime of the Project".* The Inspectorate considers this statement to be ambiguous. The applicant is advised to provide clarity regarding the timescales for implementation and operation, including whether the cropping regime would have commenced before any of the pre-commencement activities. The applicant is further advised to strengthen the wording of the commitment to confirm the start and finish date of the cropping regime.

5) The Inspectorate advises the applicant to provide an outline management plan which should be finalised post-consent and adhered to during all phases of the proposed development. The management plan should detail, in outline, the following:

    - how it has been determined that 46ha would mitigate for loss and disturbance effects
    - why the FLLMA is ecologically suitable for the proposed mitigation
    - current and potential future disturbance profiles of FLLMA, including any Public Rights of Way present and any future developments in proximity to the site
    - how the proposed cropping regime would provide optimal conditions for the affected qualifying features
    - implementation timetables and programmes
    - identification of responsibilities
    - any consents, licences, and approvals needed for implementation

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- access and biosecurity arrangements for the FLLMA
- methodology for baseline and post-implementation monitoring of onsite habitats and affected qualifying features
- success criteria, including thresholds for determining mitigation success and the trigger thresholds for adaptive management measures
- environmental data sharing processes with the relevant Local Environmental Records Centre(s) and other environmental data hubs to ensure data transparency and contribution to the existing evidence base.

6) There is no separate work number on the works plans and delivery of the FLLMA is secured only through the REAC. Given the importance of delivery of the mitigation, the applicant is advised to consider securing the mitigation through a separate works number and DCO requirement. If the mitigation is secured through a separate works number and DCO requirement, the applicant is also advised to ensure an appropriate compliance and reporting process to the relevant discharging authority is detailed in the outline management plan.

7) Table 9.6 of ES Chapter 9 Ornithology (Document 6.9) states that the applicant has been discussing the FFLMA with Natural England. The applicant is advised to provide evidence of agreement with Natural England that there is sufficient information regarding the FLLMA site to rule out an AEoI on the Humber Estuary SPA and Ramsar site.

Environmental Statement (Documents 6.1 to 6.21)

The ES presents the conclusions on residual effects differently between aspect chapters, with some providing a summary table, and others including the residual effects in the text only. The applicant is advised to update the aspect chapters which do not currently have a summary table to include this, or to provide an overall summary table.

The ES states in multiple chapters that some baseline surveys are ongoing or proposed to be undertaken at a later date. The Cover Letter (Document 1.2) states that these will be submitted at the earliest opportunity during examination but does not provide specific dates. The applicant is strongly recommended to submit these before the start of examination or provide firmer timescales for delivery of the survey data.

Environmental Statement Non-Technical Summary (Document 6.22)

Paragraph 3.1.4 refers to the provision of “Figure 1 – Non-Technical Summary Plans”, however this has not been provided. The applicant is advised to include the figure in a revised Non-Technical Summary.

Minor errors and omissions

There is a list of minor errors and omissions, in relation to both the plans and several application documents, as reflected in box 8 of the acceptance checklist.

Box 8 of the acceptance checklist can be viewed at https://national-infrastructure-consenting.planninginspectorate.gov.uk/document/EN020034-000140

It is advised that all of these minor errors and omissions are corrected before the

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commencement of the relevant representation period.

Please pay close attention to the advice set out in this letter and act on it accordingly. It is requested that you action these points before the commencement of the preliminary meeting. This will contribute towards a more efficient examination and give any future Examining Authority comfort that the documentation is complete and accurate.

We trust you find this advice helpful, however if you have any queries on these matters, please do not hesitate to contact our office using the contact details at the head of this letter.

Yours sincerely

Simon Raywood

Simon Raywood
Case Manager

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