The Great Grid Upgrade

North Humber to High Marnham

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nationalgrid

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Executive summary

Overview of the Project and Purpose of this report

National Grid Electricity Transmission plc (National Grid) is applying to the Secretary of State for Energy Security and Net Zero for a Development Consent Order (DCO) under the Planning Act 2008 (PA 2008) for the North Humber to High Marnham Project (the Project).

The Climate Change Act 2008 (2050 Target Amendment) Order 2019 legally commits the UK to reducing greenhouse gas emissions by 100% relative to 1990 levels, achieving net zero emissions by 2050. To realise this target, UK energy policy requires rapid decarbonisation of the power sector through the displacement of fossil fuel generation with low-carbon and renewable sources, alongside the mass electrification of industry, heat, and transport. Consistent with these objectives, the UK Government's Clean Power 2030 Action Plan (DESNZ, 2024) establishes an ambition to connect 42–50 GW of offshore wind, 27–29 GW of onshore wind, and 45–47 GW of solar power by 2030. Realising these targets requires substantial reinforcement of the onshore electricity transmission network to securely connect and transport vast volumes of clean electricity generated in the North Sea and East Coast to regional and national centres of demand.

The Project comprises a new 400 kilovolt (kV) electricity transmission reinforcement approximately 90 kilometres (km) in length between a new 400 kV substation in the vicinity of Birkhill Wood (north of Hull, East Riding of Yorkshire) and a new 400 kV substation at High Marnham (Nottinghamshire). The proposed infrastructure connects into new substations at Birkhill Wood and High Marnham that are consented or proposed under the Town and Country Planning Act 1990 (TCPA 1990).

The Project includes the following key components:

- Approximately 90 km of new 400 kV double-circuit electricity transmission overhead line, supported by steel lattice pylons (typically 50–60 m in height, with bespoke taller pylons to span the River Ouse);
- Replacement and realignment of approximately 5.4 km of the existing 400 kV overhead line between Brantingham and east of Broomfleet, including 16 new pylons, removal of four existing pylons, and two transmission 'line swap overs' to maintain parallel alignments;
- Replacement and realignment of approximately 0.5 km of the existing 400 kV overhead line between Ealand and west of Keadby, removing two pylons and installing six new pylons in a 'diamond duck under' configuration to provide required vertical clearances beneath the new 400 kV Route 4AF overhead line;
- Line entry connections to the proposed new 400 kV Birkhill Wood Substation and the proposed new 400 kV High Marnham Substation; and
- Associated and temporary development necessary to facilitate construction and operation, including temporary diversion of existing overhead circuits, temporary construction compounds, working areas, temporary clear-span bridges and culvert crossings, stone and matting haul tracks, highway improvements and access bellmouths, utility diversions, surface water drainage arrangements, and land for environmental mitigation, flood compensation, and Biodiversity Net Gain (BNG).

This **Planning Statement (Application Document 5.5)** has been prepared to support National Grid's application for development consent. It presents a detailed appraisal of the Project

against the policies of the designated National Policy Statements (NPSs) for energy, principally the Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Electricity Networks Infrastructure (EN-5), having regard to the National Policy Statement for Renewable Energy Infrastructure (EN-3), alongside the National Planning Policy Framework (NPPF), local development plans, and other material considerations. It reviews the planning issues in accordance with Section 104 of the PA 2008 and demonstrates that the urgent national need for the Project and its substantial public benefits outweigh its residual adverse impacts.

The Need for the Project

The high-voltage electricity transmission system in the Humber, Lincolnshire, and East Midlands regions was predominantly constructed in the 1960s to export electricity from large, centralized inland coal-fired power stations. These fossil-fuel generating assets have largely closed or are closing, and are being replaced by major renewable and zero-carbon generation sources connecting along the coast and offshore. In this region, existing generation of 4,026.3 MW is being expanded by signed connection agreements representing an additional 15,738.4 MW of new capacity, dominated by major offshore wind developments in the North Sea (including the Dogger Bank and Hornsea offshore wind farms), major solar PV arrays, and battery storage facilities.

Without substantial transmission reinforcement, the capacity of the existing network is insufficient to securely and reliably accommodate this new generation while operating in accordance with the National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS). Studies undertaken by National Grid confirm that thermal boundary export limits across the North of England to Midlands Boundary (B8) and the Midlands to South England Boundary (B9) would be severely exceeded. This would result in widespread network congestion and force generators to be constrained off the system. In these circumstances, consumers face substantial and escalating network curtailment and constraint payments, direct system balancing costs that are passed through directly onto household and business electricity bills.

Delivering the Project is therefore essential to reducing energy bills for end consumers. By resolving transmission boundary bottlenecks between the Humber and East Midlands, the Project unlocks the delivery of up to 50 GW of connected offshore wind and low-carbon power, ensuring that abundant, lowest-cost clean electricity is transported directly to major urban demand centres rather than wasted or turned down. Eliminating these boundary restrictions drives whole-system efficiency, minimises expensive constraint payments, and permanently shields households and industry from volatile international wholesale fossil fuel price shocks by anchoring Britain's electricity supply in homegrown, affordable power.

In November 2024, NESO published Clean Power 2030: Advice on achieving clean power for Great Britain by 2030, which confirmed that rapid expansion and reinforcement of the onshore electricity transmission network is essential to achieving clean power and avoiding billions in network constraint penalties. Furthermore, the UK Government’s Clean Power 2030 Action Plan (December 2024) emphasises that building around twice as much new electricity transmission infrastructure is needed across Britain’s grid by 2030 as was delivered in the previous decade, highlighting the imperative for major transmission projects to be brought forward at pace to keep energy reliable, secure, and affordable for consumers.

The principle of the Project is established through its urgent national need case and the selection of the preferred transmission alignment following a comprehensive, iterative options appraisal and design evolution process documented across the application.

Section 6 of this Planning Statement provides a comprehensive appraisal of the Project against designated NPS policies, the National Planning Policy Framework (NPPF), adopted local development plan policies across the host authorities (East Riding of Yorkshire Council, North Lincolnshire Council, Bassetlaw District Council, and Nottinghamshire County Council), and made neighbourhood plans.

Planning Appraisal

The Project has embedded good design and the mitigation hierarchy from inception to avoid, reduce, and mitigate environmental effects wherever practicable, in accordance with the statutory duties under Section 9 and Schedule 9 of the Electricity Act 1989 and the Holford guidance. This has resulted in a comprehensive site selection process and iterative ongoing design that's been led by the consideration of good design and key environmental and planning constraints, considerable stakeholder engagement and public consultation, ongoing assessments and design work.

Siting and routeing have prioritised close-parallel alignment with existing 400 kV overhead transmission infrastructure over substantial sections, clustering linear energy infrastructure to contain visual intrusion and avoid the dispersion of wirescape across previously undisturbed rural landscapes.

As a result of this, the assessments in the Environmental Statement conclude that with the implementation of embedded, control and management (and additional mitigation measures in some instances) the majority of environmental effects will not be significant, as follows:

- Ecology and Biodiversity: **Application Document 5.2 Habitats Regulations Assessment (HRA) Report** demonstrates through Appropriate Assessment that the Project will not adversely affect the integrity of the Humber Estuary SAC, SPA, and Ramsar site or any other European site, either alone or in combination with other plans or projects. Siting also avoids direct physical impacts on any Site of Special Scientific Interest (SSSI). Following the implementation of embedded, control and additional mitigation measures, also avoids impacts on priority habitats, important hedgerows and other terrestrial habitats and the majority of species and protected species, including all bird species. Mitigation includes alternative arable foraging land for qualifying birds, dedicated water vole mitigation areas, an artificial otter holt, bird flight diverters, and pre-construction protected species licensing, to safeguard ecological populations.
- Flood Risk and Water Environment: The sequential approach has guided the siting of permanent assets, which are resilient to flooding. Loss of floodplain storage resulting from pylon bases within defended floodplains is compensated for on a volume-for-volume basis in dedicated flood compensation areas (**Application Document 7.13 Flood Risk Assessment**), and watercourse crossings utilise clear-span bridges or existing structures, ensuring the Project will not increase flood risk elsewhere and protects water quality under the Water Framework Directive.
- Air Quality: **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** concludes that during construction there are no significant effects on air quality from vehicle emissions, construction plant and equipment emissions, including Non-Road Mobile Machinery. **Application Document 6.15.A2 Environmental Statement Appendix 15.2 Construction Dust Methodology and Assessment** also concludes that the effects of construction dust would not be significant for human and ecological receptors.
- Noise and Vibration: **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** concludes no significant effects as a result of construction noise and

vibration, and operational noise as a result of the Project following the implementation of best practice management measures.

- Health and Wellbeing: The siting and design of the Project comply fully with national and international exposure guidelines for electric and magnetic fields (EMFs), and no statutory nuisance under Section 79(1) of the Environmental Protection Act 1990 will arise as set out in **Application Document 5.3: Statutory Nuisances Statement**. No significant adverse effects are expected in relation to health and wellbeing.
- Traffic and Transport: No significant traffic and transport, or access effects would arise as a result of the Project, including on PRoW. Construction vehicle movements are managed across 64 primary access routes (PARs) under **Application Document 7.4 Outline Construction Traffic Management Plan** with delivery curfews around local schools, off-highway haul roads along the swathe, and managed public rights of way crossings to prevent unacceptable severance or safety hazards.
- Climate change: The Lifecycle GHG Assessment in **Application Document 6.19 Environmental Statement Chapter 19 Climate Change** concludes no significant effects from GHG emissions during construction or operation and maintenance. Best practice measures including specifying and prioritising sustainable, low-carbon materials, sourcing materials from local suppliers where reasonably practicable to reduce transportation distances and associated emissions, and utilising electric or other low-carbon plant and equipment wherever available and practicable will be implemented.
- Land Use, Open Space and Green Infrastructure: **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** concludes that no recreational land facilities, including open space, would experience significant severance effects during construction and operation including maintenance. A scheme of mitigation planting across the Project's Order Limits is proposed as set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan**. The Project does not preclude any new development or proposed use (e.g. allocated sites) in any of the relevant development plans.

In addition to the above, although mandatory BNG for Nationally Significant Infrastructure Projects (NSIPs) under the Environment Act 2021 does not take effect until November 2026, National Grid voluntarily commits to delivering at least 10% BNG across habitat, hedgerow, and watercourse units using the **Statutory Biodiversity Metric (Application Document 7.1)**, secured via Requirement 13 of the draft DCO. This includes exploring strategic woodland creation within a 12.17 ha BNG Opportunity Area adjacent to Treswell Wood, contributing directly to local priorities for hazel dormouse under the Nottinghamshire and Nottingham Local Nature Recovery Strategy.

Embedded, control and management and additional mitigation measures are secured in **Application Document 7.3: Register of Environmental Actions and Commitments**, and the relevant management plans.

The nature of long linear projects means that it is nearly impossible to avoid key constraints entirely. Routeing often needs to balance competing constraints to arrive at an overall preferred solution that may well still have significant effects, but these are by exception.

Residual significant adverse environmental effects of the Project are confined to:

- Landscape and Visual: Significant landscape character effects at Operation Year 15 on Flat Drained Farmland LCT (Route Section C) and Regional LCT 4a: Unwooded Vales (Route Sections E and F), alongside localised significant visual effects on 19 rural communities and sections of recreational trails within 200 m to 300 m of the overhead line. The Project avoids all designated National Landscapes and National Parks;

- Historic Environment: The Heritage Statement of Harm (Appendix A of this Planning Statement) concludes that in total, the Project would result in harm that is not substantial to 66 heritage assets, which comprises 59 designated heritage assets, six conservation areas and one non-designated asset. Most of this harm is at the lower end of the scale, with nine designated heritage assets and one conservation area at the middle of the scale, and one designated heritage asset (Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190) which is a scheduled monument) at the higher end of the scale. The Project would not result in substantial harm to any designated or non-designated heritage assets.
- Irreplaceable Habitats: The Project avoids impacts to designated ancient woodland on Natural England's Ancient Woodland Inventory (AWI). However, unavoidable localised loss (0.51 ha) and management (deterioration) (0.18 ha) would occur at Socken Wood and Wood Farm (woodlands possessing characteristics of ancient woodland), with potential effects (resulting in loss or deterioration) on Jillywood Lane LWS and one veteran tree (T4) should the Limits of Deviation (LoD) be utilised. These impacts are mitigated by soft-felling, soil protection, and compensatory broadleaved planting (including an agreed 30:1 replacement ratio for veteran tree T4) secured under **Application Document 7.8 Outline Landscape and Ecological Management Plan, and Application Document 7.3 Register of Environmental Actions and Commitments**.
- Agriculture and Soils: The Project results in the permanent removal of 34.4 ha of Best and Most Versatile (BMV) agricultural land (Grades 1, 2, and 3a), representing 2.27% of agricultural land within the Order Limits, with much of this land dedicated to long-term ecological and flood mitigation;
- Socio-Economics: During construction, five groups of residential receptors, and five businesses (Misterton Christian Centre, Beetroot UK, Sunflower Lodge, Newlands Equestrian and Epworth Fields Holiday Park) will experience residual significant adverse effects as a result of road closures necessary for the construction of the Project. Mitigation is set out in **Application Document 7.4 Outline Construction Traffic Management Plan**, including a working hours restriction providing morning, evening and weekend vehicle access, and measures specific to each business. These impacts would be temporary, and access would return to normal following the completion of the construction works at each road. Significant effects are also reported in relation to three aerodromes, two of these can continue their use, with only one airfield needing to permanently cease operations, based on a worst case assessment.
- Cumulative Effects: Significant cumulative landscape and visual effects in areas where the overhead line is viewed alongside existing or planned energy infrastructure (such as major solar and substation developments), cumulative loss of BMV land, and one designated heritage assets, along with temporary intra-project cumulative disturbance along active construction sections.

Decision Making and Planning Balance

Section 7 of this Planning Statement reviews the planning balance and the statutory decision-making framework under Section 104 of the PA 2008.

This Planning Statement demonstrates that the Project accords with designated NPS EN-1 and NPS EN-5, engaging the presumption in favour of granting consent for energy NSIPs under Paragraph 4.1.3 of NPS EN-1.

NPS EN-1 establishes that there is a Critical National Priority (CNP) for nationally significant low-carbon infrastructure, which explicitly includes electricity transmission power lines within the scope of NPS EN-5. Paragraph 3.3.63 of NPS EN-1 establishes that:

"Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible."

Paragraph 4.2.28 of NPS EN-1 confirms that where residual impacts remain after the mitigation hierarchy has been applied, these impacts are unlikely to outweigh the urgent need for CNP infrastructure, establishing a clear presumption of consent in all but the most exceptional circumstances.

The exceptions to this presumption set out in Paragraph 4.2.28 concern residual impacts presenting an unacceptable risk to or interference with human health and public safety, defence, irreplaceable habitats, offshore navigation, or onshore flood and coastal erosion risk. The Project does not present an unacceptable risk to human health, public safety, defence, irreplaceable habitats, flood risk, or navigation. While the alignment cannot avoid Socken Wood and Wood Farm (which are treated as irreplaceable habitats under NPS EN-1), it is demonstrated that the overriding national public need for the reinforcement clearly outweighs this localised loss, amounting to wholly exceptional circumstances under Paragraph 5.4.55 of NPS EN-1. This is also supported by a fully secured compensatory woodland strategy, and it is concluded that no unacceptable impacts to or interference with irreplaceable habitat would occur.

Because the Project would not result in unacceptable impacts, and no other statutory exceptions are engaged, the Secretary of State will adopt the starting point under Paragraphs 4.2.29 to 4.2.30 of NPS EN-1 that the Project meets all policy tests requiring a clear outweighing of harm, exceptionality, or very special circumstances across national and local planning policy. This confirms that the urgent national need case clearly outweighs significant effects amounting to the loss or deterioration of irreplaceable habitat (Socken Wood and Wood Farm) based on the current Project design, as well as potential significant effects on Jillywood Lane LWS and one veteran tree (if the LoD are used), harm that is not substantial to heritage assets, localised significant effects upon landscape and visual receptors, loss of BMV land, and intra-and inter-project cumulative effects

None of the statutory exceptions set out in Section 104(4) to (8) of the PA 2008 apply to prevent the granting of development consent. In carrying out the planning balance under Section 104(7) of the PA 2008 and Paragraph 4.1.5 of NPS EN-1, the substantial public benefits of the Project include:

- Delivering essential transmission capacity to resolve boundary transfer bottlenecks between the Humber and East Midlands, unlocking up to 50 GW of offshore wind and low-carbon generation and connecting customer generation exceeding 15.7 GW;
- Directly supporting the UK's Clean Power 2030 Action Plan, strengthening national energy security and sovereignty against international fossil fuel price shocks, reducing consumer constraint costs, and driving the transition to net zero by 2050 (substantial positive weight);
- Generating regional employment (average 284 FTE net jobs per annum), contributing £39.9 million in national GVA, and providing local skills and apprenticeship programmes (limited positive weight); and
- Delivering at least 10% Biodiversity Net Gain and establishing strategic habitat links in accordance with Local Nature Recovery Strategies (limited to moderate positive weight).

As identified in national policy and the Government's energy strategy there is an urgent and critical need to bring forward low carbon infrastructure to meet targets for decarbonisation and net zero. The Project will contribute to the delivery of these policy aims, by improving the existing electricity transmission network to accommodate the connection of proposed new power sources.

It is clear that there is a compelling case and established need for the Project and that it will deliver national economic, social and environmental benefits in line with the Government's clear objectives of delivering sustainable development.

The analysis of planning policy compliance demonstrates that the need for the Project is supported by national planning policy and other national energy and environmental policy, and that the Project addresses relevant national, marine and local planning policies through its design, avoiding sensitive areas and limiting adverse impacts where practicable.

In terms of the overall planning balance, the clear and substantial benefits of the Project clearly outweigh any adverse impacts. The presumption in favour of consent in NPS EN-1 sets out that these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure and that any tests set out in the NPS or other planning policy are to be treated as if they have been met.

This Planning Statement has demonstrated that the Project is in accordance with the relevant national policy statements and local policy considered to be important and relevant; and that substantial weight should be given to need when considering applications for consent under the PA 2008. Given the above, there is a clear and compelling case for the North Humber to High Marnham DCO to be made.

1. Introduction

1.1 Introduction

1.1.1 National Grid Electricity Transmission plc (National Grid) owns and maintains the national high voltage electricity transmission network throughout England and Wales.

1.1.2 The transmission network connects the power from where it is generated to the regional distribution network operators who then supply businesses and homes.

1.1.3 National Grid holds the Transmission Licence for England and Wales, and its statutory duty is to develop and maintain an efficient, coordinated and economical system of electricity transmission and to facilitate competition in the generation and supply of electricity, as set out in the Electricity Act 1989.

1.1.4 National Grid has developed plans for the North Humber to High Marnham Project (the Project). The Project would support the UK government's net zero target through the connection of new low carbon energy generation and by reinforcing the transmission network.

1.1.5 The Project would establish a new 400 kilovolt (kV) transmission connection approximately 90 kilometres (km) in length between a new substation to be built in the vicinity of Birkhill Wood, located to the north of Hull near Creyke Beck in the East Riding of Yorkshire, and a new substation at High Marnham in Nottinghamshire.

1.1.6 The reinforcement is needed because the existing transmission network, even with current upgrading, will not have sufficient capacity for the new renewable energy (a substantial proportion of which would be generated by offshore wind) that is expected to connect to the network over the next 10 years and beyond. Completion of the Project, together with other new reinforcements across the country, will meet this future energy transmission demand across the UK.

1.1.7 The Project is a Nationally Significant Infrastructure Project (NSIP), and National Grid is seeking development consent under the Planning Act 2008. NSIPs require a type of planning permission known as a Development Consent Order (DCO). Instead of applying to the local authority for planning permission, the developer must apply to the Secretary of State via the Planning Inspectorate for a DCO.

1.1.8 National Grid has submitted an application for development consent to the Planning Inspectorate for the Project. The Examining Authority (consisting of one or more examining inspectors), after a period of public examination, will make its recommendation to the Secretary of State for Energy Security and Net Zero, who in turn will decide on whether development consent should be granted.

1.1.9 The Project has been identified as being critical to delivering a network which supports the clean power pathways for 2030 delivery.

1.2 Purpose of the Planning Statement

1.2.1 This Planning Statement has been prepared and submitted as part of a suite of supplementary documents to support National Grid's application for a DCO (hereafter

referred to as the application for development consent) submitted to the Planning Inspectorate, with the decision whether to grant a DCO being made by the Secretary of State for Energy Security and Net Zero (the SoS) pursuant to the Planning Act 2008 (HM Government, 2008).

1.2.2 The purpose of this document is to provide an overview of the Project and its impacts, and to present an appraisal of the Project against policies in the relevant National Policy Statements (NPSs), as well as the provisions of the legislation and policies considered important and relevant to the SoS's decision making.

1.2.3 This Planning Statement has been prepared in accordance with the requirements of Regulation 5(2)(q) of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the APFP Regulations) (HM Government, 2009) and in accordance with the Planning Act 2008: Application Form Guidance (Department for Communities and Local Government, 2013) and Nationally Significant Infrastructure Projects: Advice on the Preparation and Submission of Application Documents (Planning Inspectorate, 2026).

1.2.4 The APFP Regulations (HM Government, 2009) set out the mandatory requirements for documents accompanying an application for development consent including how the application is to be prepared, the information included and the form such information is provided in. The APFP Regulations (HM Government, 2009) do not specifically require a Planning Statement to accompany an application for development consent; however, the Planning Act 2008: Guidance on preparing an application: part 2 Application contents (July 2026) (Ministry of Housing, Communities and Local Government, 2026) sets out that the Planning Statement is often submitted voluntarily as part of an application to outline the planning policy documents that are relevant, the need for the project and to weigh up the planning balance and demonstrate areas where the benefit and need of the proposed development may outweigh non-compliance with relevant policies and support an informed decision.

1.2.5 National Grid considers that a Planning Statement would assist the Examining Authority in their consideration of the application for development consent, and the SoS during determination, by bringing together relevant policies and assessing the Project’s compliance with these policies.

1.2.6 This Planning Statement accordingly sets out the planning policy context for the Project and reviews the planning issues considering the Overarching National Policy Statement for Energy (EN-1) (hereafter referred to as NPS EN-1) (Department for Energy Security and Net Zero, 2025) and National Policy Statement for Electricity Networks Infrastructure (EN-5) (hereafter referred to as NPS EN-5) (Department for Energy Security and Net Zero, 2025). National Policy Statement for Renewable Energy Infrastructure (EN-3) (hereafter referred to as NPS EN-3) (Department for Energy Security and Net Zero, 2025) is also of relevance as it expresses support for onshore infrastructure required to deliver onshore and offshore renewable energy development.

1.2.7 This Planning Statement also considers other important and relevant national and local policy such as the National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2026), Planning Practice Guidance (PPG) (Ministry of Housing, Communities and Local Government, 2016) and relevant Local Plans.

1.2.8 This Planning Statement also draws upon the conclusions of many of the application documents submitted as part of the application for development consent and assesses the information and findings against relevant planning policy considerations (see section 1.10).

1.2.9 In addition to this Planning Statement, a Policy Compliance Document (**Application Document 5.6 Policy Compliance Document**) has been produced which assesses the Project's compliance with the policy requirements established within NPS EN-1 (Department for Energy Security and Net Zero, 2025) and NPS EN-5 (Department for Energy Security and Net Zero, 2025) and other relevant policy documents.

1.2.10 The Planning Statement seeks to assist the Examining Authority and the SoS in applying the provisions of the Planning Act 2008 (HM Government, 2008) that require an application for development consent to be decided in accordance with the relevant NPS (s104(3)) except to the extent that the adverse impact of the Project would outweigh its benefits (s104(7)).

1.2.11 Sections 6 and 7 of this Planning Statement specifically considers those aspects of the Project that do not accord with the relevant policies in NPS EN-1 (Department for Energy Security and Net Zero, 2025), NPS EN-3 (Department for Energy Security and Net Zero, 2025) and NPS EN-5 (Department for Energy Security and Net Zero, 2025) to demonstrate that the benefits of the Project outweigh any harm following the application of good design and the mitigation hierarchy.

1.3 Overview of the Need for the Project

1.3.1 With growing renewables integration into the National Electricity Transmission System, such as offshore wind and interconnectors, an anticipated tripling of wind generation connected across the Scottish networks by 2030 and the government's increased ambition to connect 50 GW of offshore wind by 2030, north–south power flows are set to increase.

1.3.2 The existing electricity transmission network in the Yorkshire and Humber region was initially developed in the 1960s and has historically been able to meet demand. It was designed to connect the in-land large coal fired power stations in the region, with changes occurring in the later parts of the century in order to connect gas fired power stations and offshore wind.

1.3.3 However, due to the changes noted above in terms of delivering net zero emissions, the existing network in this area does not have the capability to reliably and securely transport all the energy that will be connected by 2030, whilst operating to the standards it is required to.

1.3.4 The existing transmission infrastructure in this area requires reinforcement for the following main reasons:

- The existing transmission network was not designed to transport electricity from where it is increasingly being generated (largely offshore).
- The growth in offshore wind, interconnectors and onshore generation such as battery and solar means that more electricity will be generated in the years ahead than the current network is able to securely and reliably transport.
- In the UK, electricity demand is forecasted to at least double by 2050, increasing the amount of energy we need to transport to homes and businesses.

- Upgrading the existing network as it is today (such as through replacing cables to carry more power) will not be enough to carry the amount of future power whilst operating to required standards.
- The need to increase boundary transfer capability in order to reduce wider network generator constraint costs.

1.3.5 The Project would support the UK's net zero target by reinforcing the electricity transmission network between the North of England and the Midlands and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The Project would help meet future energy requirements.

1.3.6 For further information please refer to the 'Needs Case' section contained within **Application Document 7.17 Strategic Options Report Including Needs Case**.

1.4 Overview of the Project

1.4.1 The Project is a new 400 kilovolt (kV) electricity transmission connection of approximately 90 kilometres (km) in overall length between two proposed new substations: the 400 kV Birkhill Wood Substation and 400 kV High Marnham Substation.

1.4.2 The proposed new substations are subject to separate planning applications. For more information, see **Application Document 5.4 Consents and Licences Required Under Other Legislation**.

1.4.3 The Project comprises:

- Approximately 90 km of new overhead line (Route Code 4AF) between the proposed new 400 kV Birkhill Wood Substation and 400 kV High Marnham Substation;
- Replacement and re-alignment of a section of the existing 400 kV overhead line (Route Code 4ZQ) between Brantingham and east of Broomfleet;
- Replacement and re-alignment of a section of the existing 400 kV overhead line (Route Code ZDA) between Ealand and west of Keadby;
- Line entry connections to a proposed new 400 kV Birkhill Wood Substation;
- Line entry connections to a proposed new 400 kV High Marnham Substation; and
- The Project would include other required works, for example, temporary diversions for works on existing overhead line routes, temporary access roads, highway works, temporary works compounds, work sites and ancillary works. The Project would also include utility diversions and drainage works. There would also be land required for environmental mitigation, offsetting, compensation and Biodiversity Net Gain (BNG).

1.4.4 A full description of the Project is provided in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project**.

1.5 Role of National Grid

National Grid Group

1.5.1 National Grid Electricity Transmission plc (the Applicant) sits within the wider National Grid Group; within the Group there are distinctly separate legal entities, each with their individual responsibilities and roles. National Grid Group sits at the heart of Great Britain's energy system, connecting millions of people and businesses to the energy they use every day. The Project is being promoted by National Grid Electricity Transmission plc.

1.5.2 Note that in this document, except when referring specifically to other National Grid Group entities below, the term 'National Grid' is used to refer to National Grid Electricity Transmission plc.

National Grid Electricity Transmission plc (National Grid)

1.5.3 National Grid holds the Transmission Licence for England and Wales, and its statutory duty is to develop and maintain an efficient, coordinated and economical system of electricity transmission and to facilitate competition in the generation and supply of electricity, as set out in the Electricity Act 1989 (HM Government, 1989).

1.5.4 National Grid, as the regulated provider of electricity transmission services in England and Wales, is regulated by the Office of Gas and Electricity Markets (Ofgem). Transmission services include maintaining reliable electricity supplies and offering to construct new transmission system assets for new connections to the National Electricity Transmission System (NETS).

1.5.5 In accordance with Transmission Licence requirements, National Grid ensures that the transmission system in England and Wales meets the requirements in respect of transmission system security and quality of service at all times. As part of this requirement, National Grid must ensure that sufficient transmission system capability is provided to meet demand and generator customer requirements and wider transmission system needs that exist and/or are expected.

1.5.6 When planning changes to the transmission system, National Grid must be efficient, coordinated and economical and have regard to the desirability of preserving amenity, in line with the duties under s9 and s38 of the Electricity Act 1989 (HM Government, 1989).

1.6 National Energy System Operator (NESO)

1.6.1 The National Energy System Operator (NESO) is the electricity system operator for Great Britain. NESO ensures electricity is always where it is needed, and the transmission network remains stable and secure in its operation.

1.6.2 As of 1 October 2024, NESO became a public body owned by the Department for Energy Security and Net Zero. It was formerly part of National Grid plc and called the Electricity System Operator (ESO).

1.6.3 NESO has been established to act as the independent organisation responsible for planning Great Britian's energy system, looking after and operating the electricity and gas networks while also offering expert advice to the sector's decision-makers.

1.7 Requirement for a Development Consent Order

1.7.1 The Project is defined as a Nationally Significant Infrastructure Project (NSIP) under s14(1)(b) and s16 of the Planning Act 2008 (HM Government, 2008) and 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 will operate at 400 kV in England.

1.7.2 Pursuant to the Planning Act 2008, an applicant is required to secure a DCO to construct, maintain and operate the Project, and it may include a range of consents and powers.

1.7.3 Other development, such as underground cables, may be granted development consent as associated development within the meaning of s115 of the Planning Act 2008 (HM Government, 2008).

1.8 Environmental Impact Assessment

1.8.1 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) (HM Government, 2017) 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.

1.8.2 As the Project includes the proposed installation of 400 kV electricity transmission infrastructure over a distance of approximately 90 km, the majority of which is overhead line, it therefore falls under Schedule 1 and requires an EIA. The Planning Inspectorate was notified that National Grid intended to provide an Environmental Statement (ES) in accordance with Regulations 6(1), 6(2)(a) and 8(1)(b) of the EIA Regulations (HM Government, 2017) by submitting an EIA Scoping Report.

1.8.3 The EIA Scoping Report (**Application Document 6.5.A1 Environmental Statement Appendix 5.1 Environmental Impact Assessment Scoping Report**) for the Project was submitted to the Planning Inspectorate on 21 August 2023. This set out the parameters of the Project, the proposed methodology for undertaking the environmental assessment and the proposed scope of the assessments to be undertaken and reported. It also identified the potentially significant environmental effects (as identified at that time) that required assessment (i.e. scoped in), as well as those that were unlikely to be significant and could therefore be scoped out of the assessment.

1.8.4 The Planning Inspectorate provided an EIA Scoping Opinion on behalf of the Secretary of State on 29 September 2023 (**Application Document 6.5.A2 Environmental Statement Appendix 5.2 Scoping Opinion**). This included the issues that National Grid should consider when producing the ES. The ES (**Volume 6**) has been prepared by National Grid and is based on **Application Document 6.5.A2 Environmental Statement Appendix 5.2 Scoping Opinion**. Summaries of all the matters raised in **Application Document 6.5.A2 Environmental Statement Appendix 5.2 Scoping Opinion**, together with National Grid's response to each matter raised, are provided in the relevant chapters in **Volume 6**. Further details on EIA scoping and the scope of the ES (**Volume 6**) are included within **Application Document 6.5 Environmental Statement Chapter 5 EIA Approach and Methodology**.

1.8.5 As part of the DCO process, National Grid undertook consultation with relevant consultees about the Project. Feedback was then used to shape the final proposals within the application for development consent. As part of this process National Grid provided preliminary environmental information, in the form of a Preliminary Environmental Information Report (PEIR) in accordance with the provisions of the Planning Act 2008 (HM Government, 2008) at that time and prior to the amendments made by the Planning and Infrastructure Act 2025 (HM Government, 2025) which took effect on 24 July 2026. In accordance with the EIA Regulations (HM Government, 2017) preliminary environmental information was required to provide the information referred to in Regulation 14(2) that is '*reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development'*. The PEIR was published in February 2025 and was made available as part of the statutory consultation for the Project, enabling consultees and interested parties to develop an informed view of the environmental effects of the Project and provide comments on that basis.

1.8.6 The ES (**Volume 6**) forms part of the application for development consent for the Project under the Planning Act 2008 (HM Government, 2008) and provides an assessment of the likely significant residual effects in accordance with the EIA Regulations (HM Government, 2017). Further details on the EIA process and the ES methodology can be found in **Application Document 6.5 Environmental Statement Chapter 5 EIA Approach and Methodology**.

1.8.7 In addition to EIA, the Project is subject to other regulatory regimes, including, for example, The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) (HM Government, 2017). These regulatory regimes require that certain assessments are carried out in addition to the preparation of the ES and the methodology and findings reported as part of application for development consent. The following documents have been prepared in parallel to the ES and where relevant are referenced within the ES (**Volume 6**):

- **Application Document 5.2 Habitats Regulations Assessment (HRA) Report**;
- **Application Document 5.3 Statement of Statutory Nuisance**;
- **Application Document 7.13 Flood Risk Assessment (FRA)**;
- **Application Document 7.12 Water Framework Directive Assessment**; and
- **Application Document 7.15 Transport Assessment**.

1.9 Host Authorities

1.9.1 The Project is located within the administrative boundaries of East Riding of Yorkshire Council, North Lincolnshire Council, Bassetlaw District Council, which forms part of the two-tier local government authority area of Nottinghamshire, where Nottinghamshire County Council is the upper tier authority. The northernmost extent of the Project comprises the connection to the new Birkhill Wood Substation, north of Cottingham and near to Hull in the administrative area of East Riding of Yorkshire Council. The Project extends south across the River Ouse into North Lincolnshire, where it continues south into the district of Bassetlaw (Nottinghamshire), connecting into the new High Marnham Substation.

1.9.2 The Project has been sub-divided into six geographical sections for reader accessibility. These are presented on **Application Document 6.1.F1 Environmental Statement Figure 1.1 Project Location and Route Sections** and comprise:

- Route Section A between the proposed Birkhill Wood Substation and the River Ouse;
- Route Section B between the River Ouse and Crowle;
- Route Section C between Crowle and North Moor (M180);
- Route Section D between North Moor (M180) and the River Idle;
- Route Section E between the River Idle and Darlton; and
- Route Section F between Darlton to the proposed High Marnham Substation.

1.9.3 National Grid has undertaken extensive engagement with the local authorities during the pre-application stage. Details of the meetings between National Grid and the respective local planning authorities (LPAs) are identified in the relevant Statements of Common Ground; these are as follows:

- East Riding of Yorkshire Council;
- North Lincolnshire Council;
- Bassetlaw District Council; and
- Nottinghamshire County Council.

1.9.4 Host authorities in respect of the Project will have the opportunity to prepare Local Impact Reports (LIRs) to inform the examination of the application for development consent. The LIRs will be considered by the SoS in determining the application for development consent. With reference to s60 of the Planning Act 2008 (HM Government, 2008) the LIRs would also address relevant local planning policies. Section 104(2)(b) of the Planning Act 2008 (HM Government, 2008) requires that, in deciding an application for development consent, the SoS must have regard to any LIRs submitted to the SoS by the deadline specified.

1.10 Relationship of the Planning Statement to the Application for Development Consent

1.10.1 In assessing the Project against relevant policy and demonstrating the overall planning case for the Project, this Planning Statement draws upon the conclusions of other documents forming part of the application for development consent, assessing them as necessary within the context of relevant policy and planning considerations. This Planning Statement draws upon, and should be read alongside, the following documents:

- **Application Document 3.1 Draft Development Consent Order**: if approved, it is this document that will grant development consent for the powers and provisions required to construct, operate and maintain the Project.
- **Application Document 3.2 Explanatory Memorandum**: this explains the purpose of the draft DCO, and the powers sought.
- **Application Volume 2 Plans and Drawings**: the plans and drawings detail various elements of the Project including Works Plans, Trees and Hedgerows to

be Removed or Managed, Traffic Regulation Order Plans, Access, Rights of Way and Public Rights of Navigation Plans, Design and Layout Plans. **Application Document 2.1 Guide to the Plans** explains the role of the different plans and factors that should be considered when viewing these plans.

- **Application Document 5.4 Consents and Licences Required Under Other Legislation**: provides information on the additional consents and licences that are, or may be required to construct and operate the Project.
- **Application Document 7.17 Strategic Options Report Including Needs Case**: sets out the need case for the Project and an overview of the strategic options that National Grid identified and subsequently evaluated that could meet that need case**.**
- **Application Document 5.8 Statements of Common Ground**: the draft Statement of Common Ground seeks to identify matters on which parties agree and to track progress towards the resolution of any matters where agreement has not yet been reached.
- **Application Document 5.9 Design Development Report**: this report provides an overview of the design rationale for the Project and explains how design choices have minimised or avoided environmental effects.
- **Application Document 5.10 Design Approach Document**: The Design Approach Document presents the preparation and evolution of the design case from inception to that presented in the application; and demonstrates how the Project achieves high-quality design.
- **Volume 6 Environmental Statement**: the application is accompanied by an ES which provides information on the likely significant effects associated with the Project during its construction, maintenance and operation. The information provided in the ES informs consultation required by the EIA Regulations and, together with representations made by consultation bodies and other persons about the environmental effects of the Project, forms environmental information to be considered by the SoS in the determination of the DCO application. The early identification of potential significant adverse environmental effects enables consideration of appropriate mitigation measures (i.e. following the mitigation hierarchy – avoid, prevent or reduce, and if not possible, offset likely significant adverse effects on the environment) to be considered and where appropriate, identified and incorporated into the design of the Project.
- **Application Document 5.1 Consultation Report**: provides a detailed account of the pre-application consultation activities carried out by National Grid prior to the submission of the application for development consent. It demonstrates that National Grid has complied with the statutory requirements and explains how relevant responses received were taken account of prior to the application for development consent being submitted.

1.10.2 **Application Document 1.3 Guide to the Application** and **Application Document 1.6 Self Completed Section 55 Checklist** set out the structure of the application for development consent and how it satisfies the relevant requirements of legislation and guidance concerning the preparation, assessment and submission of applications including:

- The APFP Regulations 2009 (HM Government, 2009);

- The Infrastructure Planning (Compulsory Acquisition) Regulations 2010 (HM Government, 2010);
- The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (HM Government, 2017);
- The Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on the Preparation and Submission of Application Documents (Planning Inspectorate, 2026);
- Planning Act 2008: Guidance on preparing an application: Part 1 – Pre-application steps (Ministry of Housing, Communities and Local Government, 2026);
- Planning Act 2008: Guidance on preparing an application: Part 2 – Application contents (Ministry of Housing, Communities and Local Government, 2026);
- Planning Act 2008: Guidance on the acceptance stage of a Development Consent Order application (Ministry of Housing, Communities and Local Government, 2026); and
- The Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on the Consultation Report (Planning Inspectorate, 2024).

1.10.3 The full schedule of documents submitted with this application is set out in **Application Document 1.3 Guide to the Application**.

1.10.4 This document should be read in conjunction with **Application Document 1.7 Glossary and Acronyms** which sets out a list of acronyms and terms used throughout the application documents.

1.11 Structure of the Planning Statement

1.11.1 The remainder of this Planning Statement is structured as follows:

- Section 2: Legislation and Policy Context – provides an overview of the decision-making framework, legislation and policy context as well as other important relevant considerations.
- Section 3: Need for the Project – sets out and describes the need for, and the benefits of the Project.
- Section 4: The Order Limits and Surrounding Areas – describes the Order Limits and sets out the wider context of its surrounding location.
- Section 5: The Project – provides details of the Project and its components.
- Section 6: Planning Appraisal – provides an assessment of the Project-wide effects against the relevant legislative and policy context, as well as other important and relevant considerations.
- Section 7: Decision-Making and Planning Balance – provides an assessment of the overall planning balance of the Project and overall conclusion in terms of the Project's compliance with relevant legislation and policy.

2. Legislation and Policy Context

2.1 Introduction

2.1.1 This section outlines the legislative framework and the planning policy context for the Project. Section 2.2 sets out the relationship of the Project with the Planning Act 2008 (HM Government, 2008) and introduces the national and local planning policy and other documents that the SoS may consider to be important and relevant.

2.1.2 This section of the Planning Statement is supported by **Application Document 5.6 Policy Compliance Document**, which identifies the relevant policies of the NPSs for Energy, the NPPF (Ministry of Housing, Communities and Local Government, 2026) and local planning policies that the SoS may consider to be important and relevant to their decision, and presents an appraisal of the Project's compliance with these policies.

2.2 Planning Act 2008

2.2.1 The Project is defined as a NSIP under s14(1)(b) and s16 of the Planning Act 2008 (HM Government, 2008) and the Planning Act 2008 (Nationally Significant Infrastructure Projects) (Electric Lines) Order 2013 (HM Government, 2013), as it involves the installation of an electric line above ground of more than 2 km, which will operate at 400 kV in England.

2.2.2 Pursuant to the Planning Act 2008 (HM Government, 2008), an applicant is required to secure a DCO to construct, maintain and operate the Project, and it may include a range of consents and powers.

2.2.3 Other development, such as underground cables, may be granted development consent as associated development within the meaning of s115 of the Planning Act (HM Government, 2008).

2.2.4 Part 6 of the Planning Act 2008 (HM Government, 2008) is to be applied when determining an application development consent. S103 to s107 of the Planning Act 2008 (HM Government, 2008) provide the framework for decision making of an application for development consent. S104(2)(a) provides that, in deciding applications for development consent, the SoS must have regard to any relevant NPS. S104(3) states the SoS must decide such applications in accordance with any relevant NPSs unless the exceptions at s104(4) to (8) apply. The application of s104(3) and s104(4) to (8) is discussed further in section 7 of this Planning Statement.

2.2.5 In addition, s104(2) of the Planning Act 2008 (HM Government, 2008) requires the SoS to have regard to the following, in deciding an application for development consent:

- Any Local Impact Report (s104(2)(b) of the Planning Act 2008 (HM Government, 2008);
- Any matters prescribed (s104(2)(c) of the Planning Act 2008 (HM Government, 2008); and

- Any other matters which the SoS thinks are both important and relevant to the SoS's decision (s104(2)(d) of the Planning Act 2008 (HM Government, 2008).

2.2.6 As detailed above, s104(2) of the Planning Act (HM Government, 2008) sets out that the primary policy considerations for NSIPs include any relevant NPS. NPSs are produced by the government, pursuant to specific legislative requirements under the Planning Act 2008 (HM Government, 2008) to set out policy for nationally significant development in a particular sector, and provide the framework for decisions on applications for NSIPs in that sector.

2.2.7 In this case, the Energy NPSs are of relevance to the Project, therefore s104 of the Planning Act 2008 (HM Government, 2008) applies. The relevant Energy NPSs are set out in section 2.4.

2.2.8 Schedule 1 of **Application Document 3.1 Draft Development Consent Order** Authorised Development sets out the description of the works for which consent is sought. Further detail is provided in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project**.

2.3 Electricity Act 1989

2.3.1 National Grid holds the Transmission Licence for England and Wales under the Electricity Act 1989 (as amended) (HM Government, 1989); and under S9(2), this requires National Grid '*to develop and maintain an efficient, co-ordinated and economical system of electricity transmission*'.

2.3.2 In addition, s38 and paragraph (1) of Schedule 9 of the Electricity Act 1989 (HM Government, 1989) require that National Grid, when formulating proposals for new lines and other works:

'(a) shall 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

(b) 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.*'*

2.3.3 National Grid's Stakeholder, Community and Amenity Policy (National Grid, 2025) sets out how the company will meet the Schedule 9 duty placed upon it by the Electricity Act 1989 (HM Government, 1989).

2.3.4 National Grid's 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 transporting electricity to and from customers.

2.3.5 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.

2.3.6 Generators apply to the 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, 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 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.

2.4 Relevant Policy Documents Relating to the Project

National Planning Policy

2.4.1 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.

2.4.2 In deciding an application for development consent, s104 of the Planning Act 2008 (HM Government, 2008) requires the Secretary of State for Energy Security and Net Zero to determine the application in accordance with any relevant NPS. The following NPSs which came into force on 6 January 2026 are relevant to the Project:

- Overarching National Policy Statement for Energy (EN-1) (Department for Energy Security and Net Zero, 2025);
- National Policy Statement for Renewable Energy Infrastructure (EN-3) (Department for Energy Security and Net Zero, 2025); and
- National Policy Statement for Electricity Networks Infrastructure (EN-5) (Department for Energy Security and Net Zero, 2025).

2.4.3 NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out national policy for energy infrastructure in combination with the relevant technology-specific NPS which, in this case, is NPS EN-5 (Department for Energy Security and Net Zero, 2025). NPS EN-1 (Department for Energy Security and Net Zero, 2025) emphasises the need for new energy projects to contribute to a secure, diverse, reliable and affordable energy supply.

2.4.4 NPS EN-5 (Department for Energy Security and Net Zero, 2025) sets out the government's policy for nationally significant electricity transmission networks and, together with NPS EN-1 (Department for Energy Security and Net Zero, 2025), identifies the information that should be provided alongside any application for development consent to satisfy its requirements.

2.4.5 NPS EN-3 (Department for Energy Security and Net Zero, 2025) 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) (2025)

2.4.6 NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out the government's overarching policy for energy NSIPs, emphasising the need for new energy projects to contribute to a secure, diverse, and affordable energy supply.

2.4.7 NPS EN-1 (Department for Energy Security and Net Zero, 2025) recognises that in order '*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 2.1.2). It continues '*Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy*' (paragraph 3.3.58).

2.4.8 Paragraph 3.3.68 recognises that '*The volume of onshore reinforcement works needed to meet decarbonisation targets is substantial*'. It also states that NESO forecasts that over the next decade a doubling of north–south power transfer capacity will be required, including substantial reinforcement in the Midlands.

2.4.9 Section 2.2 sets out the approaches to Clean Power 2030 and Net Zero by 2050 and states: '*Cleaning up our power system is central to the decarbonisation of our economy. A clean electricity supply opens up routes to the electrification of heat, transport and industry and reduces pollution, protects our environment and quality of life*' (paragraph 2.2.2). It continues on to state, '*Meeting the Clean Power 2030 Mission objectives necessitates a significant investment in new energy infrastructure, both large nationally significant developments and smaller-scale developments determined at a local level*' (paragraph 2.3.4) which '*will be driven through rapid deployment of low carbon generation, flexibility infrastructure, and electricity transmission infrastructure.*' (paragraph 2.3.5).

2.4.10 Section 4.2 sets out the critical national priority (CNP) for low carbon infrastructure and states that the '*Government has committed to the Clean Power 2030 Mission, 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). Paragraph 4.2.16 concludes that there is a CNP for the provision of nationally significant low carbon infrastructure, while paragraph 4.2.17 confirms '*all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure*', are classed as CNP infrastructure.

2.4.11 NPS EN-1 (Department for Energy Security and Net Zero, 2025) in paragraph 3.3.63 outlines that subject to any legal requirements, the urgent need for CNP infrastructure to achieving the UK government's energy objectives, along with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by the application of the mitigation hierarchy. Subsequently NPS EN-1 (Department for Energy Security and Net Zero, 2025) states in paragraph 3.3.63 that the '*Government strongly supports the delivery of CNP infrastructure and it should be progressed as quickly as possible*.'

2.4.12 NPS EN-1 (Department for Energy Security and Net Zero, 2025) also sets out guidance on generic impacts of any of the types of energy infrastructure covered by the energy NPS in respect of matters such as air quality and emissions (section 5.2), biodiversity (section 5.4), dust and odour (section 5.7), flood risk (section 5.8), historic environment (section 5.9), landscape (section 5.10), land use (section 5.11), noise and vibration (section 5.12), socio-economics (section 5.13), traffic and transport (section 5.14) and waste management (section 5.15).

National Policy Statement for Electricity Networks Infrastructure (EN-5) (2025)

2.4.13 NPS EN-5 (Department for Energy Security and Net Zero, 2025) specifically relates to electricity networks infrastructure.

2.4.14 Paragraph 1.1.1 of NPS EN-5 (Department for Energy Security and Net Zero, 2025) recognises that the '*security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable the new electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to Clean Power by 2030 and net zero, while maintaining energy security*.'

2.4.15 NPS EN-5 (Department for Energy Security and Net Zero, 2025) states in paragraph 2.1.5: '*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 electricity network reinforcement and upgrade works, and associated infrastructure such as substations, are considered to be CNP infrastructure*'.

2.4.16 NPS EN-5 (Department for Energy Security and Net Zero, 2025) sets out that the assessment principles outlined in section 4 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) continue to apply to CNP infrastructure.

2.4.17 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.*

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 NESO.*'

2.4.18 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* […]'.

2.4.19 Paragraph 2.2.10 of NPS EN-5 (Department for Energy Security and Net Zero, 2025) reiterates the duties of transmission and distribution licence holders under s9 of the Electricity Act 1989 (HM Government, 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 physiographical features of special interest* […]'.

2.4.20 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*'.

2.4.21 Section 2.7 of NPS EN-5 (Department for Energy Security and Net Zero, 2025) deals with holistic planning and states: '*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).

2.4.22 Paragraph 2.7.3 notes that '*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.*'

2.4.23 Section 2.8 deals with strategic network planning and sets out in paragraph 2.8.1 that a '*more strategic approach to network planning is essential to ensure that network development keeps pace with renewable generation and anticipates future system needs*' (this is also referred to in paragraphs 2.13.1 – 2.13.13).

2.4.24 Paragraph 2.9.7 states 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* […]'.

2.4.25 Paragraph 2.9.16 recognises the importance of the guidelines provided in the Holford Rules (National Grid, 1959) and states these are '*intended as a common-sense approach to overhead line route design, were reviewed and updated by the industry in the 1990s and they should be embodied in the applicants' proposals for new overhead lines*'.

2.4.26 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* [...]'.

Biodiversity Gain Statement for Energy

2.4.27 In June 2026, the Department for Environment, Food and Rural Affairs (Defra) published biodiversity gain statements for NSIPs, which explain how NSIPs need to calculate, deliver and report on BNG. According to the Government's guidance on BNG, published in August 2026 (Defra, 2026), biodiversity gain statements have the same effect as if they were included in the NPSs, and will be incorporated when each NPS is next reviewed. For the Project, the biodiversity gain statement for energy (Defra, 2026) is relevant. Paragraphs 2.1 to 2.4 state that the biodiversity gain objective set out in the statement applies to NSIP applications for DCOs submitted under section 37 and determined under section 104 or 105 of the Planning Act 2008, which comprises nationally significant energy infrastructure including electric lines, in England.

2.4.28 Paragraph 3.1 states that '*The biodiversity gain objective requires that the biodiversity value attributable to a development exceeds the pre-development biodiversity value of the on-site habitat by at least 10%. This is also referred to as 10% BNG*'.

2.4.29 Paragraph 4.1 states that '*BNG should be applied alongside the mitigation hierarchy. Applicants should avoid significant harm to biodiversity resulting from the proposed development in the first instance. Where it is not possible to avoid significant harm to*

biodiversity, applicants should include appropriate mitigation measures to reduce the impact, and as a last resort, provide compensation for any harm to biodiversity. Applicants must include detail in their outline biodiversity gain plan on how their proposals follow the mitigation hierarchy'.

2.4.30 Paragraph 5.1 sets out that '*Applicants must use the statutory biodiversity metric (referred to in paragraph 4 of Schedule 7A to the Town and Country Planning Act 1990) to calculate the biodiversity value or relative biodiversity value of any habitat or habitat enhancement for the purpose of meeting the biodiversity gain objective*'. Paragraph 5.2 follows that '*For a development to meet the biodiversity gain objective, the biodiversity value attributable to a development (which may include on-site units, off-site units and statutory biodiversity credits) must exceed the pre-development biodiversity value of the on-site habitat by at least 10%*'.

2.4.31 Paragraphs 6.1 to 6.20 explain how the pre-development biodiversity value, or baseline should be calculated and reported.

2.4.32 Paragraphs 7.1 to 7.16 explain how BNG should be delivered, with paragraph 7.1 and 7.2 stating that:

'The biodiversity value attributable to a development can include, in the first instance, either or both of the:

post-development biodiversity value of the on-site habitat (on-site gains)

*biodiversity value of any registe*red off-site biodiversity gain allocated to the development (off-site gains).

As a last resort option, it can include the biodiversity value of any statutory biodiversity credits purchased for the development.'

2.4.33 Section 8 relates to irreplaceable habitats. Paragraph 8.1 explains that the biodiversity gain statement and objective does not change the existing protections and compensation requirements for irreplaceable habitats, and '*Where a proposed development will result in the loss or deterioration of any irreplaceable habitats, applicants and decision makers should refer to relevant planning policy and guidance on irreplaceable habitats*'.

2.4.34 Section 9 details the information and evidence required for submission of a DCO application, stating at paragraph 9.2 that '*Applicants must submit an outline biodiversity gain plan to the Planning Inspectorate as part of their DCO application. The purpose of the outline biodiversity gain plan is to set out a strategy for how the proposed development will deliver the statutory biodiversity gain objective of at least 10%*'.

2.4.35 Paragraph 10.1 concludes that '*In accordance with sections 104 and 105 of the Planning Act 2008, the Secretary of State will not grant an application for development consent unless satisfied that the proposed development meets the biodiversity gain objective contained in this biodiversity gain statement. The Secretary of State can consider the biodiversity gain objective as met if there are requirements in the DCO securing it will be met*'.

2.5 Other Important and Relevant Planning Policy

Introduction

2.5.1 While NPSs are the primary basis for decision making when considering NSIPs, the SoS must also have regard to any material considerations which they think are both important and relevant to the decision. This could include other relevant national policy documents, alongside relevant regional and local planning policies.

National Planning Policy Framework

2.5.2 The NPPF (Ministry of Housing, Communities and Local Government, 2026) sets out, in paragraph 13 of Chapter 1, that it does not contain specific policies for NSIPs – these being determined in accordance with the decision-making framework in the Planning Act 2008 (HM Government, 2008): '*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 this Framework)*'.

2.5.3 While the NPSs remain the primary decision-making documents, regard must also be had to any other matters of importance and relevance, which may include relevant policies in the NPPF (Ministry of Housing, Communities and Local Government, 2026).

2.5.4 The NPPF (Ministry of Housing, Communities and Local Government, 2026) is supported by the PPG (Ministry of Housing, Communities and Local Government, 2016) which provide guidance on the interpretation and application of the policies in the NPPF for authorities and applicants. The PPG provides guidance on specific topics including air quality, BNG, flood risk and other topics. NPS EN-1 (Department for Energy Security and Net Zero, 2025) does include footnote references to the PPG; reference to the NPPF (Ministry of Housing, Communities and Local Government, 2026) and PPG (Ministry of Housing, Communities and Local Government, 2016) is made in respect of relevant matters within section 6 of this Planning Statement.

Local Planning Policy

2.5.5 As set out above, the NPSs are the primary basis for decision making, but the SoS must also have regard to any other matters which they think are both important and relevant to the decision and this could include regional and local planning policies. In so doing, the SoS may have regard to the LIRs produced by the relevant LPAs for consideration during the examination of the application.

2.5.6 The ES (**Volume 6**) has considered current and emerging local policy documents relevant to the Project which are likely to inform the LIRs prepared by the LPAs, and which may be relevant and important in their own right.

2.5.7 The relevant adopted and emerging local plans and supplementary planning documents (SPDs) for the Project comprise:

East Riding of Yorkshire Council

- East Riding Local Plan Update 2020–2039 including the Strategy Document (East Riding of Yorkshire Council, 2025), Allocations Document (East Riding of Yorkshire Council, 2025) and Policies Map (Adopted 2025) (East Riding of Yorkshire Council, 2025);
- East Riding of Yorkshire and Kingston upon Hull Joint Minerals Local Plan (Adopted 2019) (East Riding of Yorkshire Council, Hull City Council, 2019);
- East Riding of Yorkshire and Kingston upon Hull Joint Waste Local Plan (Adopted 2004) (Hull City Council, East Riding of Yorkshire Council, 2024);
- Ellerker Neighbourhood Plan 2024–2039 (Referendum Version December 2025) (Ellerker Parish Council, 2025);
- East Riding of Yorkshire Sustainable Transport SPD (2024) (East Riding of Yorkshire Council, 2024); and
- Flood Risk Sequential Test and Exception Test SPD (2021) (East Riding of Yorkshire Council, 2021).
- Cottingham Neighbourhood Plan and Design Guide 2015–2029 (Made 2018) (Cottingham, 2018)

North Lincolnshire Council

- North Lincolnshire Local Development Framework Core Strategy (Adopted 2011) (North Lincolnshire Council, 2011);
- North Lincolnshire Local Plan Saved Policies (Adopted 2003, Updated 2024) (North Lincolnshire Council, 2003);
- North Lincolnshire Planning for Renewable Energy Development SPD (2011) (North Lincolnshire Council, 2011); and
- North Lincolnshire Sustainable Drainage Systems and Flood Risk Guidance (2025) (North Lincolnshire Council, 2025).

Bassetlaw District Council

- Bassetlaw Local Plan 2020–2038 (Adopted 2024) (Bassetlaw Local Plan, 2024);
- Clarborough and Welham Neighbourhood Plan (Made 2017) (Clarborough and Welham Parish Council, 2017);
- Headon, Upton, Grove and Stokeham (HUGS) Neighbourhood Plan (Made 2018) (Nether Headon, Upton, Grove and Stokeham Parish, 2018);
- Rampton and Woodbeck Neighbourhood Plan (Made 2021) (Bassetlaw District Council, 2021);
- Treswell with Cottam Neighbourhood Plan (Made 2024) (Bassetlaw District Council, 2023);
- Misterton Neighbourhood Plan (Made 2024) (Misterton Parish Council, 2024);
- Walkeringham Neighbourhood Plan (Made 2021) (Walkeringham Neighbourhood Plan Steering Group, 2021);

- Sturton Ward Neighbourhood Plan (Made 2021) (Sturton Ward Planning Group, 2021);
- East Drayton Neighbourhood Plan (Made 2025) (East Drayton Neighbourhood Planning Group, 2026);
- Bassetlaw Biodiversity Net Gain SPD (2025) (Bassetlaw District Council, 2025); and
- Bassetlaw Trees and Development SPD (2026) (Bassetlaw District Council, 2026);

Nottinghamshire County Council

- Nottinghamshire and Nottingham Waste Local Plan (Adopted 2025) (Nottinghamshire County Council, Nottingham City Council, 2025);
- Nottinghamshire Minerals Local Plan (Adopted 2021) (Nottinghamshire County Council, 2021); and
- Nottinghamshire Biodiversity Net Gain SPD (2025) (Nottinghamshire County Council, 2025).

Marine Planning Policy

2.5.8 The Project includes an overhead cable crossing of the Humber Estuary. The Humber Estuary is located within the East Inshore and East Offshore Marine Plans (HM Government, 2014) area, which extends from Flamborough Head to Felixstowe out to the seaward limit of the territorial sea.

2.5.9 The East Inshore and East Offshore Marine Plans establish the statutory framework for the sustainable development of this marine area. The plans integrate economic, social, and environmental objectives to manage the collective pressure of human activities and ensure the sustainable use of the marine environment.

2.6 Other Policy and Documents Considered to be Important and Relevant

International Climate Policy Context

2.6.1 The government's energy policy is driven by a global need, and international commitments, to move towards net zero emissions, and achieving this through developing new sources of renewable energy and transmitting it from where it is generated to where it is needed.

2.6.2 Although there had been previous international agreements, most recent policy derives from the Paris Agreement which was adopted under the auspices of the United Nations Framework Convention on Climate Change in 2015. This had as an objective, the holding of the increase in global average temperature to well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels, recognising that this would significantly reduce the risks and impacts of climate change.

2.6.3 The Conference of the Parties (COP26) held in Glasgow in 2021 (United Nations, n.d.) agreed on accelerated action on climate change this decade and reaffirmed the

long-term goal to limit global warming to 1.5°C above pre-industrial levels and resolved to pursue efforts to achieve this, recognising that limiting global warming to 1.5°C '*requires rapid, deep and sustained reductions in global greenhouse gas emissions, including reducing global CO_2 emissions by 45% by 2030 relative to the 2010 level and to net zero around mid-century*'.

2.6.4 COP27 (United Nations, n.d.) held in Sharm el-Sheikh in 2022 again reaffirmed the commitment to limiting global warming to 1.5°C and agreement to provide 'loss and damage' funding to vulnerable countries hit hard by climate disasters.

2.6.5 COP28 (United Nations, n.d.) held in Dubai in 2023 closed with an agreement that signals the 'beginning of the end' of fossil fuels by outlining a 'just and equitable transition', underpinned by deep emissions cuts and financial commitments. At the 2024 United Nations Climate Change Conference (COP29) (United Nations, n.d.) held in Baku, Azerbaijan, the United Kingdom (UK) made significant commitments to address climate change which included:

- Enhanced Emission Reduction Target: The UK announced a new Nationally Determined Contribution (NDC), pledging to reduce greenhouse gas emissions by 81% by 2035 compared to 1990 levels. This target reflects an increase from the previous goal of a 78% reduction. The UK's NDC is aligned with the advice from the Climate Change Committee, which suggests that this level of ambition is consistent with limiting warming to 1.5°C.
- Climate Finance Commitment: Developed nations, including the UK, agreed to triple climate finance to developing countries, setting a new target of $300 billion annually by 2035. This funding aims to assist developing nations in mitigating and adapting to the impacts of climate change.

2.6.6 COP29 (United Nations, n.d.) maintained the process of international climate diplomacy, negotiating key agreements on finance and carbon markets. However, it deferred several other decisions until COP30 in Brazil in November 2025.

2.6.7 COP30 (United Nations, n.d.) was held in Belem, Brazil in November 2025 and saw continued international engagement to address the challenges posed by climate change. COP30 included 194 countries agreeing that low greenhouse gas emissions and climate resilience are irreversible and a trend of the future. COP30 saw acknowledgement of the likelihood of overshooting warming by 1.5°C this century. Whilst some progress was secured regarding areas such as the protection and safeguarding of tropical forests, no roadmap for the decarbonisation of fossil fuels was achieved and many countries failed to submit new NDCs.

Climate Change Act 2008

2.6.8 The Climate Change Act 2008 (HM Government, 2008) forms the basis for the UK's approach to tackling and responding to climate change. It requires that emissions of carbon dioxide and other greenhouse gases are reduced and that climate change risks are adapted to. The Act also establishes the framework to deliver on these requirements.

2.6.9 Through the Climate Change Act 2008 (HM Government, 2008), the UK government set a target to significantly reduce UK greenhouse gas emissions by 2050 and a path to get there. The Climate Change Act 2008 (HM Government, 2008) also established the Committee on Climate Change (CCC) to ensure that emissions targets are evidence-based and independently assessed. In addition, the Climate Change Act

2008 (HM Government, 2008) requires the government to assess the risks and opportunities from climate change for the UK, and to adapt to them. The CCC Adaptation Committee advises on these climate change risks and assesses progress towards tackling them.

2.6.10 The Climate Change Act 2008 (HM Government, 2008) originally committed the UK to reducing its greenhouse gas emissions by 80% by 2050, compared to 1990 levels. However, in 2019 (HM Government, 2019) this was changed to a target to reduce greenhouse gas emissions by 100% by 2050, compared to 1990 levels; this is commonly known as 'net zero'.

Clean Power 2030

2.6.11 In November 2024 NESO published its independent analysis on how the Department for Energy Security and Net Zero can achieve its ambitious Clean Power goal.

2.6.12 In the Clean Power 2030 report (NESO, 2024), NESO laid out pathways for how Great Britain can reach a clean power system by 2030. The report identifies that offshore wind will provide over half of Great Britain's generation, with onshore wind and solar providing another 29%. New dispatchable low carbon technologies, such as using carbon capture and storage or hydrogen, add significant value to the system, with even relatively small levels of operational capacity materially reducing the overall challenge for the rest of the programme.

2.6.13 Associated with the new energy generation the report identifies the need for a major network expansion, in line with published plans for the transmission network and with further strengthening at distribution level.

Clean Power 2030 Action Plan: A New Era of Clean Electricity

2.6.14 Following the publication of the NESO Clean Power 2030 Report (NESO, 2024), the government published the Clean Power 2030 Action Plan (HM Government, 2024) setting out the government's view of the pathway to 2030 and setting targets required to achieve clean power by 2030.

2.6.15 Clean Power 2030 Action Plan (HM Government, 2024) outlines strategies to accelerate the transition to a cleaner energy system by 2030, focusing on reducing greenhouse gas emissions, increasing renewable energy use, and promoting energy efficiency.

2.6.16 Clean Power 2030 Action Plan (HM Government, 2024) predicts that in a typical weather year, the 2030 power system will see clean sources produce at least as much power as Great Britain consumes in total over the whole year, and at least 95% of Great Britain's generation, reducing the carbon intensity of power generation from 171 gCO_2e/kWh in 2023 to well below 50 gCO_2e/kWh in 2030.

2.6.17 To achieve this, Clean Power 2030 Action Plan (HM Government, 2024) outlines the ambition to secure the following generation mix:

- 42–50 GW of offshore wind;
- 27–29 GW of onshore wind; and
- 45–47 GW of solar power.

2.6.18 These will be complemented by flexible capacity, including 23–27 GW of battery capacity, and 4–6 GW of long-duration energy storage.

2.6.19 Clean Power 2030 Action Plan (HM Government, 2024) identifies a series of challenges which need to be addressed to secure the 2030 targets and in particular the need for the construction of generation and transmission projects to commence by 2026 if they are to be operational by 2030.

2.6.20 Clean Power 2030 Action Plan (HM Government, 2024) notes that around twice as much new transmission infrastructure will be needed in the nation's grid by 2030 as has been built in the past decade.

2.7 Pre-Application Consultation

2.7.1 S42 and s47 of the Planning Act 2008 (HM Government, 2008) previously required applicants for development consent to carry out formal (statutory) pre-application consultation on their proposals. As a result, National Grid undertook statutory consultation during Spring 2025.

2.7.2 Following the introduction of the Planning and Infrastructure Act 2025 (HM Government, 2025) including secondary legislation and guidance that came into force on 24 July 2026, this formal requirement to undertake statutory consultation has now been removed albeit a proportionate pre-application engagement is still strongly recommended. National Grid has undertaken extensive consultation throughout the development of the Project, and this is ongoing. This is described in **Application Document 5.1 Consultation Report** and its supporting appendices, and includes the stages in Table 2.1.

Table 2.1 – Key engagement activities carried out during the pre-application stage

Activity	Timeframe
Non-statutory consultation	1 June – 27 July 2023
EIA Scoping Request	August 2023
Scoping Opinion	September 2023
Localised non statutory consultation	9 July – 6 August 2024
Statutory consultation	18 February – 15 April 2025
Targeted consultations with Persons with an Interest in Land (PILs)	Newly Identified PILs: 11 June to 9 July 2025 Previously Identified PILs (notified about updates to the Project): 11/18 June 2025 Newly Identified PILs: 14 January to 11 February 2026 Newly Identified PILs: 15 May to 12 June 2026 Newly Identified PILs: 15 June to 13 July 2026 Newly Identified PILs: 16 July to 14 August 2026 Newly Identified PILs: 12 August to 10 September 2026

Activity	Timeframe
Project update meeting with Planning Inspectorate following statutory consultation	21 May 2025
Submission of draft DCO documents for Planning Inspectorate review	1 May 2026
Adequacy of Consultation Milestone Submission (AoCM)	14 July 2026
Further PINS/LPA meetings	Ongoing meetings every six weeks with the LPAs, every four weeks with the LHAs, and regular meetings with the Planning Inspectorate approximately every two months
DCO submission	16 October 2026

2.7.3 During the non-statutory consultation which took place between 1 June 2023 and 27 July 2023, National Grid presented the scheme preferred route corridor and graduated swathe for the route of the overhead line. The feedback received at this consultation was considered alongside the findings of National Grid's ongoing environmental assessments, stakeholder engagement and technical studies. As a result of this feedback and further work National Grid identified a potential alternative corridor in the southernmost section of the route, between the villages of South Wheatley and High Marnham. The potential alternative corridor was referred as the 'eastern corridor'.

2.7.4 To address these findings, a localised non-statutory consultation was held between 9 July and 6 August 2024 on the area between South Wheatley and High Marnham. This presented the eastern corridor and graduated swathe and ensured all stakeholders had the opportunity to provide feedback on the work to date and to state their preference regarding where National Grid should route the new overhead line within the eastern corridor and graduated swathe, should the eastern corridor be taken forward.

2.7.5 At the 2025 statutory consultation, National Grid presented a preferred route for the new overhead line, possible pylon positions and how the Project avoids, minimises and addresses any potentially significant environmental effects. The feedback received at this consultation was considered alongside the findings of environmental and engineering studies. This further work helped to identify the proposals presented at targeted landowner consultation in January 2026.

2.7.6 At the 2026 targeted consultations, National Grid presented proposed changes to the proposals in specific areas.

2.7.7 National Grid has had regard to all feedback it has received in response to its consultations, including any changes made to the Project because of the feedback received. This is further described in **Application Document 5.1 Consultation Report**.

2.8 Details of Other Consents and Licences

2.8.1 A number of other consents, licences and permits are expected to be required for the Project which will be sought outside the application for development consent. In summary these include (but are not limited to):

- European Protected Species Licences (comprising separate licences for various species);
- Water consents (for works over or under a designated river and connections for the supply and abstraction of water);
- Waste storage permits (for earthworks); and
- Control of pollution (for construction activities generating significant noise).

2.8.2 A full schedule of the other consents and licences required for the Project is set out in **Application Document 5.4 Consents and Licences Required Under Other Legislation**.

2.9 Statements of Common Ground

2.9.1 National Grid commenced the development of Statements of Common Ground with statutory consultees, statutory undertakers and interested parties during the preparation of the application for development consent. The Statements of Common Ground (**Application Document 5.8 Statements of Common Ground**) have been prepared collaboratively with stakeholders and seek to identify matters on which parties agree and to track progress towards the resolution of any matters where agreement has not yet been reached. Statements of Common Ground are not a statutory requirement under the Planning Act 2008 (HM Government, 2008) but are provided in response to s8(e) of the Infrastructure Planning (Examination Procedure) Rules 2010 (HM Government, 2010) and in accordance with the guidance contained in Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects (Ministry of Housing, Communities and Local Government, 2024).

2.9.2 As per **Application Document 5.1 Consultation Report** and **Application Document 5.8 Statements of Common Ground**, National Grid has engaged extensively with relevant LPAs and statutory consultees. Regular meetings and workshops have been held to explain the Project from inception through to the final DCO design. National Grid will continue to engage with LPAs and statutory consultees as relevant throughout the examination process, and should consent be granted, through the construction period.

2.10 Prescribed Matters

2.10.1 The prescribed matters that are of relevance to the SoS in determining an application for development consent referred to in s104(2)(c) of the Planning Act 2008 (HM Government, 2008) are set out in The Infrastructure Planning (Decisions) Regulations 2010 (HM Government, 2010). Within this, the following are of relevance to the Project:

- Regulation 3 – Having regard to the desirability of preserving listed buildings, conservation areas and scheduled monuments and their settings where a development would affect these matters. This is considered in section 6.5 of this

Planning Statement and in **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage**.

- Regulation 7 – Having regard to the United Nations Environmental Programme Convention on Biological Diversity of 1992 which is a legally binding international treaty that aims to conserve biodiversity, promote the sustainable use of its components, and ensure the fair and equitable sharing of benefits from genetic resources. It was adopted at the 1992 Earth Summit in Rio de Janeiro and has been ratified by the UK.

3. Need for the Project

3.1 Introduction

3.1.1 This section provides a summary of the need for the Project established within national planning policy and in how it responds to the critical national priority for the provision of a secure supply of energy. This section should be read alongside **Application Document 7.17 Strategic Options Report Including Needs Case**.

3.1.2 Consistent with the government's Net Zero target of connecting up to 50 gigawatts (GW) of offshore wind by 2030, there has been, and continues to be, growth in the volume of renewable and zero carbon generation that is seeking to connect to the electricity transmission system in the Humber/Trent and Lincolnshire regions.

3.1.3 Growth in onshore green technologies, offshore wind generation and interconnectors with Europe has seen a significant number of connections planned in Scotland, England and, significantly, in areas of the East Coast of England.

3.1.4 Historically, the transmission system was powered by coal powered generating stations. The increasing importance of low carbon generation has driven the closure of these generating stations, with more expected to close in the future. This generating capacity is being replaced by low carbon generation which is mostly geographically located away from the coal powered generating stations. The transmission system must be updated to reflect the location of the new generation capacity.

3.1.5 Electricity demand is especially concentrated in large urban areas, including urban areas in the M62 corridor, the M18 corridor, the Midlands, the M4 corridor and the South East. The transmission system carries bulk energy from the generators to points on the network where that power is taken onto the distribution networks for onward transmission to homes and businesses across England and Wales. As the country decarbonises, this national demand for energy will increase and new low carbon generation will replace fossil fuel generation.

3.2 The Planning Policy Need for the Project

3.2.1 As set out in section 1.7 of this Planning Statement, the Project is nationally significant and is development for which development consent is required, under s14(1)(b) and s16 of the Planning Act 2008 (HM Government, 2008).

3.2.2 Section 3 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out the need for significant amounts of new large-scale low carbon energy infrastructure to meet the government's energy objectives. In this context, paragraph 3.2.8 states: '*the Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent'*.

3.2.3 Paragraph 3.3.62 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) explains that the '*Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure*'.

3.2.4 As set out further below, the Project comprises CNP infrastructure. Paragraph 3.3.63 of NSP EN-1 states: '*Government strongly supports the delivery of CNP infrastructure and it should be progressed as quickly as possible*'.

3.2.5 Paragraphs 3.3.65 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) adds: '*There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives*'.

3.2.6 Paragraph 3.3.66 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states: '*The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security*.'

3.2.7 Paragraph 3.3.68 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states: '*The volume of onshore reinforcement works needed to meet decarbonisation targets is substantial. NESO forecasts that over the next decade the onshore and offshore transmission network, some of which is located offshore will require a doubling of north-south power transfer capacity due to increased wind generation in Scotland [and] substantial reinforcement in the Midlands to accommodate increased power flows from Scotland and the North of England* […]'.

3.2.8 Paragraph 4.2.16 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) reiterates that there is a CNP for the provision of nationally significant low carbon infrastructure. Paragraph 4.2.17 of NPS EN-1 defines all power lines within the scope of NPS EN-5 including network reinforcement and upgrade works as CNP infrastructure, and therefore the Project constitutes CNP infrastructure. In accordance with paragraphs 3.3.65 and 3.3.66 of NPS EN-1 (Department for Energy Security and Net Zero, 2025), the Project will provide the urgently needed reinforcement to the transmission system in the Humber and East Midlands regions.

3.2.9 Reflecting the level and urgency of need for energy infrastructure, paragraph 4.1.3 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states that the SoS should start with a presumption in favour of granting consent to applications for energy NSIPs. The presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused, subject to the provisions of the Planning Act 2008.

3.2.10 Paragraph 4.1.7 goes on to provide guidance to the SoS in making decisions on CNP infrastructure such as the Project, stating '*Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development. For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects not capable of being addressed by application of the mitigation hierarchy, in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, or irreplaceable habitats. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.*'

3.3 Need for Future Reinforcement to the Humber/Trent and Lincolnshire Transmission System

3.3.1 The transmission network in the area of the Project was primarily constructed in the 1960s, at the same time as much of the rest of the transmission system. It was designed to connect the inland large coal-fired power stations in the region, with changes occurring in the later parts of the century connecting gas-fired power stations in the Humber region in particular. Little or no transmission infrastructure was constructed in some areas, so there is currently limited ability to support new connections on the coast.

3.3.2 This generation capacity has recently been added to by several existing projects including offshore wind and energy storage, with the existing generation totalling 4,026.3 MW of installed capacity. This is expected to grow substantially in the coming years. In the area, connection agreements have been signed for 15,738.4 MW of new generation (total of 19,764.7 MW minus existing generation of 4,026.3 MW). These future connection agreements comprise a large amount of offshore wind generation (including Dogger Bank and Hornsea offshore wind farms), solar photovoltaic (PV) arrays, energy storage and further energy developments.

3.3.3 Without further reinforcement, the capacity of the Humber/Trent and Lincolnshire existing network is insufficient to accommodate the connection of the proposed new power sources.

3.4 The Network Reinforcement for Humber/Trent and Lincolnshire

3.4.1 There are areas within each of the Humber/Trent and Lincolnshire regions where a number of generation projects have contracted with the NESO to connect to the electricity transmission system. National Grid has assessed the likely impacts associated with the connection of the total volume of new generation (the 'generation group') for each of the two areas identified within the Humber/Trent and Lincolnshire regions. The two generation groups identified for the Humber/Trent and Lincolnshire regions are the following:

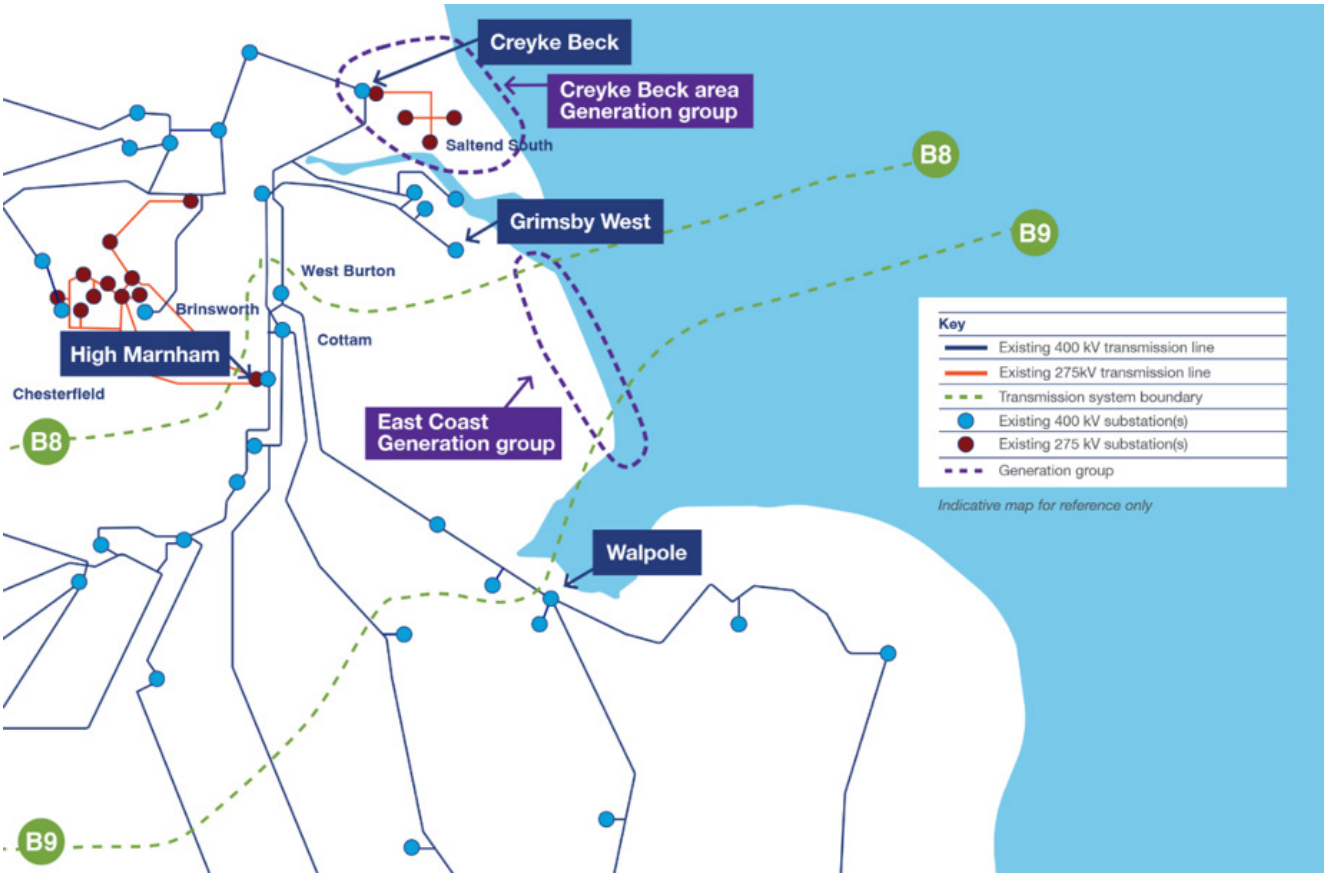
- Creyke Beck area generation group; and
- East Coast (South Humber to North Wash) generation group.

3.4.2 Each of these areas need to comply with the generation connection requirements within the National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS) (NESO, 2025). Both the Creyke Beck Area and East Coast Connection generation groups have a significant amount of customer generation contracted to connect in each area. Applying the requirements of the NETS SQSS generation criteria, these connection contracts provide the starting locations for reinforcements. To comply with the NETS SQSS, sufficient transmission capacity must be provided to allow the full contracted generation to connect in each generation group.

3.4.3 There is also a need to reinforce two 'boundaries' (North of England to Midlands Boundary B8 and Midlands to South England Boundary B9) within the transmission system. A 'boundary', in this context, splits the system into two parts, crossing critical circuit paths that carry power between areas and where power flow limitations may

be encountered. Boundaries help identify regions where reinforcement is most needed by enabling analysis of power transfers between separated areas. The existing transmission system and the generation groups and boundaries are shown on Image 3.1.

Image 3.1 – Humber/Trent and Lincolnshire region transmission system and system boundaries



3.4.4 National Grid has assessed the possible impacts that the additional contracted generation capacity beyond 2030 would have on volumes of electricity that flow between parts of the transmission system that contain significant amounts of demand and generation.

3.4.5 Each of the circuits which cross the B8 and B9 boundary has a capacity during the winter Average Cold Spell (ACS) period. This is referred to as the 'pre fault capacity'. The 'post fault capacity' is defined by the remaining capacity across a boundary following the worst fault 'secured event'. Our assessment shows that the Creyke Beck area generation group and the East Coast generation group both require additional transmission capacity across the B8 and B9 boundaries to facilitate the connections in both areas.

3.4.6 The results from National Grid's updated assessment of the existing transmission system capacity/capability and the volume of additional transmission system capacity/capability needed to meet both the boundary requirements of 2035 as well as the further contracted generation connection requirements beyond that target date. There are four distinct issues that need to be resolved by system reinforcement:

- Provision of circa 7 GW capacity to the Creyke Beck area generation group.
- Provision of circa 7 GW capacity to the East Coast area generation group.
- Provision of 11,686 MW of capability to the B8 boundary.
- Provision of 11,797 MW of capability to the B9 boundary.

3.4.7 In summary, this analysis shows that without reinforcement, the capacity of the Humber/Trent and Lincolnshire existing network is insufficient to accommodate the connection of proposed new power sources connecting in the area

3.4.8 For further information please refer to the 'Needs Case' section contained within **Application Document 7.17 Strategic Options Report Including Needs Case**.

3.5 Conclusions on the Need for the Project

3.5.1 The Project is regarded by NPS EN-1 (Department for Energy Security and Net Zero, 2025) as nationally significant low carbon infrastructure which is a critical national priority. The Project will provide the urgently needed reinforcement to the transmission system in the Humber and East Midlands. Without reinforcement, the capacity of the existing network in the Humber and East Midlands is insufficient to accommodate the connection of proposed new power sources connecting in the area. This reinforcement will ensure that, in accordance with national and local policies and targets, the Project will improve the existing electricity transmission network, and will contribute to energy independence, the UK's decarbonisation requirements and climate change targets, and assist in ensuring the supply of energy remains secure, reliable and affordable.

4. The Order Limits and Surrounding Areas

4.1 Overview

4.1.1 This section provides an overview of the Order Limits and surrounding area. It describes the location and context within which the Project would be constructed, maintained and operated and identifies key land use planning issues affecting land within the Order Limits and surrounding area. The Order Limits are the maximum extent of the land required to construct, maintain and operate the Project.

4.1.2 This section provides a Route Section by Route Section overview of the Project, whilst identifying the key planning constraints in each Route Section, which are then further considered in section 7 of this Planning Statement.

4.1.3 A full description of the Project is provided in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project**. The Order Limits are defined as the maximum extent of land within which the Project, as described in this section, may be carried out. They include both permanent and temporary land required to construct, operate and maintain the Project. The Order Limits and design for the Project are shown in **Application Document 2.4 Works Plans** while the extent of the land and rights necessary to construct and operate the Project are shown on **Application Document 2.3 Land Plans**.

4.2 Administrative Boundaries and Geographical Context

4.2.1 The Project is located in the Yorkshire and the Humber and East Midlands regions of England. It is located in an area that is predominantly rural in nature where large parts of the land are in agricultural use. The city of Kingston upon Hull, and the towns of Beverley, Crowle, Scunthorpe, Epworth, Haxey, Gainsborough and Retford are located within 5 km of the Order Limits. There are multiple villages and individual properties within or near to the Project.

4.2.2 The Project is located within the administrative boundaries of East Riding of Yorkshire Council, North Lincolnshire Council and Bassetlaw District Council in Nottinghamshire, with Nottinghamshire County Council also being a host authority. The northernmost extent of the Project comprises the connection to the consented Birkhill Wood Substation north of Cottingham (northwest of Hull) in the administrative area of East Riding of Yorkshire Council. The Project extends south across the River Ouse into North Lincolnshire, where it continues south into the district of Bassetlaw (Nottinghamshire), connecting into the proposed High Marnham Substation.

4.2.3 The Project has been divided into Route Sections, which are shown on **Application Document 2.4 Works Plans** and **Application Document 6.1.F1 Environmental Statement Figure 1.1 Project Location and Route Sections**.

4.3 Route Section A – Between the Proposed Birkhill Wood Substation and the River Ouse

Location

4.3.1 The proposed overhead line in this Route Section is shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design** (Sheets 1 to 11) and details of the pylons are set out in **Application Document 6.4.A1 Environmental Statement Appendix 4.1 Indicative Pylon Schedule**. This Section is located wholly within the administrative area of East Riding of Yorkshire. The first pylon in this Route Section is proposed pylon 4AF3 and the last pylon in this Route Section is proposed pylon 4AF76.

4.3.2 From the separately consented Birkhill Wood Substation, the proposed overhead line is routed west for approximately 1.8 km passing to the south of Jillywoods and crossing the A164 Beverley Road to proposed pylon 4AF9. From proposed pylon 4AF9, the overhead line is routed southwest for approximately 3.3 km to the north and west of the settlement of Skidby, crossing Little Weighton Road to proposed pylon 4AF19.

4.3.3 From proposed pylon 4AF19, the proposed overhead line is routed southwest for approximately 6.1 km in close parallel with the existing 4ZQ 400 kV overhead line to the south of the settlement of Little Weighton, crossing Riplingham Road and Lambwell Hill and to the north of Brantingham Dale SSSI to proposed pylon 4AF37.

4.3.4 Between proposed pylons 4AF37 and 4AF48 the proposed overhead line is swapped onto pylons on the existing 4ZQ 400 kV overhead line. This is referred to as a 'line swap over' which is described in section 5.3 of this Report.

4.3.5 To facilitate this line swap, 16 new pylons would be constructed to the south of the existing 4ZQ 400 kV overhead line alignment. The new section of overhead line would be between proposed pylon 4ZQ79A and proposed pylon 4ZQ64. The section of overhead line would cross the A63 and route to the south of the settlement of Ellerker crossing Brough Road and Sands Lane. A new section of conductor would be installed diverting the existing 4ZQ 400 kV overhead line route onto the 16 new pylons.

4.3.6 From proposed pylon 4AF48, the new pylons would swap back to being installed in close parallel to the north of the existing 4ZQ 400 kV overhead line alignment for a further 9.3 km to the north of the settlement of Broomfleet. The route would cross Ings Lane, the Selby to Hull railway line, Carr Lane, Landing Lane, the Market Weighton Canal, Tongue Lane and Staddlethorpe Broad Lane, and Blacktoft Lane to the end of the Route Section close to the settlement of Yokefleet.

Key Environmental Designations and Allocations

4.3.7 There are no international designated sites within Route Section A, with the closest being the Humber Estuary Special Area of Conservation (SAC), Special Protection Area (SPA), and Ramsar being located approximately 300 m south at its closest point, east of Yokefleet. In terms of National Statutory Sites, the Order Limits within Route Section A include an area of Brantingham Dale Site of Special Scientific Interest (SSSI) which is part located within the Order Limits. The Humber Estuary SSSI is located 300 m south at its closest point. Other national designations in the wider area surrounding Route Section A include:

- Everthorpe Quarry SSSI (approximately 2.16 km away);
- Drewton Lane SSSI (approximately 2.55 km away);
- Burton Bushes SSSI (approximately 3.25 km away);
- South Cliffe Common SSSI (approximately 3.25 km away);
- Wyedale SSSI (approximately 4.38 km away); and
- Hotham Meadow SSSI (approximately 4.96 km away).

4.3.8 One Local Statutory Site for nature conservation (Beverley Parks Local Nature Reserve (LNR)) is located 0.64 km from Route Section A.

4.3.9 Three Local Non-Statutory Sites designated for nature conservation lie partly within the Order Limits of Route Section A. Three further sites lie adjacent to the Order Limits, with a further 25 within 2 km.

4.3.10 No areas of ancient woodland are present within Route Section A, however, there are two areas which exhibit attributes of ancient woodland such as presence of ancient woodland indicator species, and one further area adjacent to the Order Limits. Within 2 km of Route Section A there are seven areas of ancient woodland. There are 13 Veteran Trees within 30 m of Route Section A.

4.3.11 In terms of designated heritage assets, within 3 km of Route Section A there are six Scheduled monuments, one Grade II Registered Park and Garden, six Grade II listed buildings, one Grade II* listed building, and three Conservation Areas. There are 12 non-designated heritage assets within 1 km of Route Section A. The Market Weighton Canal historic landscape feature is also located within Route Section A.

4.3.12 Route Section A is located on 428.92 ha of agricultural land, of which 214.85 ha is best and most versatile (BMV) land (Grades 1, 2 and 3a).

4.3.13 The northern section of Route Section A (east of the A63) is located almost entirely in Flood Zone 1 (low risk), with parts located in Flood Zone 2 (medium risk) and Flood Zone 3 (high risk), associated with Brantingham Beck. To the west of the A63, the majority of Route Section A is located in Flood Zone 2 and 3, associated with the fluvial and tidal floodplains of the Humber Estuary.

4.3.14 In terms of local plan allocations within the East Riding of Yorkshire Local Plan, Route Section A is partly located within the 'Living With Water' area, designated under Policy ENV6 which aims to build flood resilience, develop innovative water management systems, and highlight the region as a great place to live, work and visit. It is also located within an area of Functional Floodplain Flood Zone 3b designated under Policy ENV6. Route Section A is located within an Important Landscape Area (Yorkshire Wolds) as designated under Policy ENV2, and also within Mineral Safeguarding Areas (MSAs) including chalk, crushed rock, sand and gravel and brick clay as designated under Policy EC6.

4.4 Route Section B – Between the River Ouse and Crowle

Location

4.4.1 The proposed overhead line in Route Section B is shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design** (Sheets 11 to 16) and details of the pylons are set out in **Application Document 6.4.A1**

Environmental Statement Appendix 4.1 Indicative Pylon Schedule. The route within this Section crosses from East Riding of Yorkshire into North Lincolnshire.

4.4.2 The first pylon in this Route Section is proposed pylon 4AF77 and the last pylon is proposed pylon 4AF114. From the start of Route Section B at Blacktoft Lane, the proposed overhead line is routed in a generally southerly direction crossing the River Ouse and Main Street Ousefleet between the settlements of Ousefleet and Whitgift. The proposed overhead line remains broadly parallel with the existing overhead line; however, the proposed overhead line deviates from being in close parallel between proposed pylons 4AF76 and 4AF84 in order to avoid oversailing properties within the settlement of Ousefleet and Hall Garth moated site Scheduled Monument. From proposed pylon 4AF84, the proposed overhead line is routed south, to the west of and in close parallel with the existing 4ZQ 400 kV overhead line. The route passes to the west of the settlements of Adlingfleet and Garthorpe and east of the settlement of Luddington, crossing Cow Lane, Pasture Lane, Garthorpe Road, Carr Lane and Meredyke Road to proposed pylon 4AF101.

4.4.3 From proposed pylon 4AF101 the proposed overhead line turns and is routed southwest around the north of Keadby Wind Farm and away from being in close parallel with the existing 4ZQ 400 kV overhead line. Through this section the proposed overhead line passes to the south of the settlements of Luddington and Eastoft, crossing Pasture Lane and Carr Lane to proposed pylon 4AF114. Here, the proposed overhead line turns to route south to the end of this Route Section just before proposed pylon 4AF115.

4.4.4 In Route Section B, proposed pylons 4AF77 and 4AF78 would be bespoke pylons to facilitate the crossing of the River Ouse. These proposed pylons would be similar in height to the existing river crossing pylons on the 4ZQ overhead line. Indicative pylon heights are provided in **Application Document 6.4.A1 Environmental Statement Appendix 4.1 Indicative Pylon Schedule**.

Key Environmental Designations and Allocations

4.4.5 Three internationally designated sites partly lie within Route Section B, Humber Estuary SAC, SPA and Ramsar. In terms of National Statutory Sites, the Order Limits within Route Section B include an area of the Humber Estuary SSSI. One other national designation, Eastoft Meadow SSSI, lies within the vicinity of Route Section B, approximately 0.98 km away.

4.4.6 Four Local Statutory Sites for nature conservation lie within 5 km of Route Section B.

4.4.7 Two Local non-statutory site for nature conservation lie partly within Route Section B, Blacktoft Sands RSPB Reserve and Paupers' Drain LWS. One further non-statutory site, Burton upon Stather Brick Pit LWS lies within 2 km of the Order Limits.

4.4.8 There is no ancient woodland within 2 km of Route Section B and there are three veteran trees within 30 m of the Order Limits.

4.4.9 In terms of designated heritage assets, within 3 km of Route Section B there is one Scheduled monument, four Grade II listed buildings, two Grade I listed buildings, and one Conservation Area. There are four non-designated heritage assets within 1 km of the Order Limits in Route Section B.

4.4.10 Route Section B is located on 257.18 ha of agricultural land, of which 217.64 ha is BMV land (Grades 1, 2 and 3a).

4.4.11 Route Section B, west of the A63 is located mostly in Flood Zone 2 and 3, associated with the fluvial and tidal floodplains of the River Trent.

4.4.12 In terms of local plan allocations, Route Section B is located within an area of Functional Floodplain Flood Zone 3b designated under Policy ENV6 of the East Riding of Yorkshire Local Plan. It is also located in an MSA including sand and gravel as designated under Policy EC6. The nature designations associated with the Humber as mentioned above are also within Route Section B and designated under Policy ENV4. There are no allocations or designations from the North Lincolnshire Local Plan within Route Section B.

4.5 Route Section C – Between Crowle and North Moor (M180)

Location

4.5.1 The proposed overhead line in Route Section C is shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design** (Sheets 16 to 19), and details of the pylons are set out in **Application Document 6.4.A1 Environmental Statement Appendix 4.1 Indicative Pylon Schedule**.

4.5.2 The first pylon in the Route Section is proposed pylon 4AF115 and the last pylon is proposed pylon 4AF128.

4.5.3 From just north of proposed pylon 4AF115, the proposed overhead line is routed broadly south to the east of Crowle for approximately 6.4 km. The route crosses Outgate, the existing ZDA 400 kV overhead line, the Sheffield and South Yorkshire Navigation and the A18 to the end of Route Section C between proposed pylons 4AF128 and 4AF129, located at North Moor, northwest of Junction 2 on the M180.

4.5.4 Within Route Section C, the proposed overhead line crosses the existing ZDA 400 kV overhead line between Keadby and Crowle. To facilitate this crossing, the existing ZDA overhead line would be split into two routes of lowered overhead line between proposed pylons ZDA119A and ZDA120C beneath the proposed overhead line. This is to give the required clearance between the proposed and existing lines. Six new pylons are proposed and approximately 520 m of existing ZDA overhead line, including two pylons, would be removed. This type of crossing is referred to as a ‘diamond duck under’.

Key Environmental Designations and Allocations

4.5.5 There are no internationally designated sites for nature conservation within the Order Limits within Route Section C, with the closest being Thorne Moor SAC and Thorne and Hatfield Moors SPA approximately 2.69 km away. In terms of nationally designated sites for nature conservation, Crowle Borrow Pits SSSI is located adjacent to the Order Limits. Other nationally designated sites include:

- Hatfield Chase Ditches SSSI (approximately 0.28 km away);
- Clarborough Tunnel SSSI (approximately 0.62 km away);
- Thorne, Crowle and Goole Moors SSSI (approximately 2.69 km away); and
- Humberhead Peatlands NNR (approximately 2.7 km away).

4.5.6 There are no local statutory sites for nature conservation within this Route Section.

4.5.7 Seven non-statutory sites for nature conservation lie partly within Route Section C. Nine further sites lie within 2 km of the Order Limits within Route Section C. These all comprise LWSs.

4.5.8 There is no ancient woodland within 2 km of Route Section C and there are no veteran trees within 30 m of the Order Limits.

4.5.9 In terms of designated heritage assets in Route Section C there is one Grade II listed building within 3 km of the Order Limits, which is the Grade II listed Farmhouse approximately 100 metres east of Mosswood Grange Farmhouse. There are no non-designated heritage assets within 1 km of the Order Limits. Route Section C runs through the Isle of Axholme historic landscape and over the Sheffield and South Yorkshire Navigation historic landscape feature.

4.5.10 Route Section C is located on 101.56 ha of agricultural land, of which 91.93 ha is BMV land (Grades 1, 2 and 3a).

4.5.11 Route Section C, west of the A63 is located mostly in Flood Zone 2 and 3, associated with the fluvial and tidal floodplains of the River Trent. In terms of local plan allocations, Route Section C is located within an area of High/Historic Landscape Value designated under Policy LC14 of the North Lincolnshire Local Plan.

4.6 Route Section D – Between North Moor (M180) and the River Idle

Location

4.6.1 The proposed overhead line in Route Section D is shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design** (Sheets 19 to 24), and details of the pylons set out in **Application Document 6.4.A1 Environmental Statement Appendix 4.1 Indicative Pylon Schedule**. The route at the end of this Section crosses into the administrative area of Bassetlaw District Council from North Lincolnshire Council.

4.6.2 The first pylon in this Route Section is proposed pylon 4AF129 and the last pylon is proposed pylon 4AF171.

4.6.3 From the start of Route Section D in North Moor, between proposed pylons 4AF128 and 4AF129, the proposed overhead line is routed southeast crossing the M180, passing to the west of the settlement of Beltoft and east of the settlement of Belton. The proposed overhead line crosses Belton Road, Gurry Lane, Epworth Road and Sand Road to proposed pylon 4AF140.

4.6.4 From proposed pylon 4AF140, the proposed overhead line is routed southwest in close parallel with the existing 4TM and ZDA 400 kV overhead lines to the east of the settlements of Epworth and Low Burnham to proposed pylon 4AF152, crossing Newlands Lane and Melwood Hill. There is a deviation from being in close parallel, crossing Burnham Road and East Lound Road between proposed pylons 4AF152 and 4AF155 in order to avoid residential properties at Low Hall Farm. Between proposed pylons 4AF152 and 4AF156 the proposed overhead line passes to the west of the settlement of Owston Ferry and east of the settlements of East Lound and Graizelound.

4.6.5 At proposed pylon 4AF156 the proposed overhead line diverts away from the existing overhead line, and continues to the southwest. It then crosses Ferry Road, Warping

Drain, Gunthorpe Road, Stockwith Road, a railway line, Tindale Bank Road and the River Idle to the end of this Route Section to the north of proposed pylon 4AF172.

Key Environmental Designations and Allocations

4.6.6 There are no internationally designated sites for nature conservation within the Order Limits within Route Section D, with the closest being Hatfield Moor SAC approximately 5.73 km away. In terms of nationally designated sites for nature conservation, there are nine within 5 km comprising:

- Hewson's Field SSSI (approximately 0.39 km away);
- Rush Furlong SSSI (approximately 1.08 km away);
- Haxey Grange Fen SSSI (approximately 1.37 km away);
- Belshaw SSSI (approximately 2.29 km away);
- Epworth Turbary SSSI (approximately 3.14 km away);
- Laughton Common SSSI (approximately 3.65 km away);
- Tuetoes Hills SSSI (approximately 3.79 km away);
- Haxey Turbary SSSI (approximately 3.81 km away); and
- Scotton and Laughton Forest Ponds SSSI (4.94 km away).

4.6.7 In terms of local statutory sites designated for nature conservation, there are three LNRs within 5 km of Route Section D.

4.6.8 There are three non-statutory sites for nature conservation partly within the Order Limits of Route Section D with another nine within 5 km.

4.6.9 No areas of ancient woodland are present within Route Section D or within 2 km, however, there are two areas which exhibit attributes of ancient woodland such as presence of ancient woodland indicator species located within the Order Limits. There are 10 veteran trees within 30 m of Route Section D.

4.6.10 In terms of designated heritage assets, within 3 km of Route Section D there are two scheduled monuments, three Grade II listed building and two Grade I listed buildings. There are four non-designated heritage assets within 1 km of Route Section D, and the Isle of Axholme historic landscape is also located in this route section.

4.6.11 Route Section D is located on 237.44 ha of agricultural land, of which 147.35 ha is BMV land (Grades 1, 2 and 3a).

4.6.12 Route Section D is located mostly in Flood Zone 2 and 3, associated with the fluvial and tidal floodplains of the River Trent and its tributaries.

4.6.13 In terms of local plan allocations, Route Section D is located within an area of High/Historic Landscape Value designated under Policy LC14 of the North Lincolnshire located and also within a Clay Protection Area as designated under Policy M15. Route Section D is also located in close proximity to two Sites of Importance for Nature Conservation designated under Policy LC4, crossing one of these at the southern end of the Route.

4.7 Route Section E – Between the River Idle and Darlton

Location

4.7.1 The proposed overhead line in Route Section E is shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design** (Sheets 24 to 33), and details of the pylons are set out in **Application Document 6.4.A1 Environmental Statement Appendix 4.1 Indicative Pylon Schedule**.

4.7.2 The first pylon in this Route Section is proposed pylon 4AF172 and the last is proposed pylon 4AF247.

4.7.3 From the start of Route Section E, just to the south of the River Idle and north of proposed pylon 4AF172, the proposed overhead line is routed southwest for approximately 3.5 km to the west of the settlement of Misterton, crossing Cornley Road and Cattle Road to proposed pylon 4AF182.

4.7.4 From proposed pylon 4AF182 the proposed overhead line turns to route southeast for approximately 9 km to the west of the settlements of Walkeringham, Beckingham and Saundby and east of the settlements of Gringley on the Hill and North and South Wheatley. The route crosses the Chesterfield Canal, the B1403, Walkeringham Road, the A631, and Wood Lane to pylon 4AF196, west of Beckingham. It then turns south, crossing the A620 Gainsborough Road and the Sheffield to Lincoln railway line to proposed pylon 4AF209.

4.7.5 From proposed pylon 4AF209 the proposed overhead line is routed in a southwesterly direction for approximately 3.6 km to the east of the railway and west of Sturton le Steeple. The route crosses over Station Road, Freeman's Lane, Springs Lane, the disused former railway line to Cottam Power Station, and Dunstone Road to proposed pylon 4AF220, adjacent to Caddow Wood, west of North Leverton with Habblesthorpe.

4.7.6 From proposed pylon 4AF220 the proposed overhead line routes back in a southeasterly direction towards South Leverton for approximately 1.3 km, crossing Retford Gate and Retford Road West to proposed pylon 4AF224.

4.7.7 From proposed pylon 4AF224 the proposed overhead line is routed generally south for approximately 8.1 km to the west of South Leverton, Treswell, Woodbeck, East Drayton and east of Darlton. The route crosses Hollowgate Road, Cowsland Road, Forewood Lane, Ashley Lane, Retford Road, Main Street, Retford Road (East Drayton) and Dalton Road to the end of this Route Section at the A57.

Key Environmental Designations and Allocations

4.7.8 There are no international statutory sites designated for nature conservation within Route Section E. Two National statutory sites lie partly within the Order Limits, Chesterfield Canal SSSI and Treswell Wood SSSI, with a further nine within 5 km comprising:

- Clarborough Tunnel SSSI (approximately 0.62 km away);
- Mother Drain SSSI (approximately 0.65 km away);
- Ashton's Meadow SSSI (approximately 0.8 km away);
- Castle Hill Wood SSSI (approximately 2.41 km away);

- River Idle Washlands SSSI (approximately 2.49 km away);
- Misson Line Bank SSSI (approximately 2.8 km away);
- Misson Training Area SSSI (approximately 2.89 km away);
- Lea Marsh SSSI (approximately 3.13 km away);
- Gamston & Eaton Woods and Roadside Verges SSSI (approximately 3.37 km away); and
- Sutton and Lound Gravel Pits SSSI (approximately 4.51 km away).

4.7.9 There is one local statutory site designated for nature conservation within 5 km of Route Section E, Theaker Avenue LNR.

4.7.10 In terms of non-statutory sites there are four located partly within the Order Limits of Route Section E and a further 52 within 2 km.

4.7.11 There is one area of ancient woodland partly located within the Order Limits at Route Section E, Treswell Wood. Part of Tong's Wood is also located immediately adjacent to Route Section E. There is also one area which exhibit attributes of ancient woodland such as presence of ancient woodland indicator species located within the Order Limits. Within 2 km of Route Section E there are three further areas of ancient woodland. There are 12 veteran trees within 30 m of Route Section E.

4.7.12 In terms of designated heritage assets, within 3 km of Route Section E there are three scheduled monuments, one Grade II listed buildings, two Grade II* listed buildings, three Grade I listed buildings and one Conservation Area. There are four non-designated heritage assets within 1 km of Route Section E and the Order Limits also cross the Chesterfield Canal historic landscape feature.

4.7.13 Route Section E is located on 412.1 ha of agricultural land, of which 308.02 ha is BMV land (Grades 1, 2 and 3a).

4.7.14 Route Section E is located mostly in Flood Zone 1. Areas within Flood Zone 2 and 3 are associated with watercourses including Wheatley Beck, North Beck, East Drayton, and Fledborough Beck.

4.7.15 Route Section E is located within a sand and gravel MSA designated within the Nottinghamshire Minerals Local Plan.

4.8 Route Section F – Darlton to the Proposed High Marnham Substation

Location

4.8.1 The proposed overhead line in Route Section F is shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design** (Sheets 33 to 34), and the pylons detailed in **Application Document 6.4.A1 Environmental Statement Appendix 4.1 Indicative Pylon Schedule**.

4.8.2 The first pylon in this Route Section is proposed pylon 4AF248 and the last pylon is proposed pylon 4AF258.

4.8.3 From the start of Route Section F at the A57, the proposed overhead line is routed southeast for approximately 3.1 km to the east of Darlton. The route crosses

Fledborough Beck, Far Road, the disused railway to west of the Marnham Railway Yard Local Wildlife Site and Fledborough to Harby Dismantled Railway Local Wildlife Site to proposed pylon 4AF256. From proposed pylon 4AF256 the proposed overhead line is routed east for a further 0.5 km to the proposed High Marnham Substation.

Key Environmental Designations and Allocations

4.8.4 There are no international statutory sites or national statutory sites designated for nature conservation within Route Section F.

4.8.5 There are no local statutory sites designated for nature conservation within 5 km of Route Section E.

4.8.6 In terms of non-statutory sites there are none located within the Order Limits of Route Section F, but eight within 2 km.

4.8.7 No areas of ancient woodland are present within Route Section F, however, there is one area which exhibit attributes of ancient woodland such as presence of ancient woodland indicator species. Within 2 km of Route Section F there are no further areas of ancient woodland and one veteran tree within 30 m of the Order Limits.

4.8.8 In terms of designated heritage assets, within 3 km of Route Section F there are two scheduled monuments. There is one non-designated heritage asset within 1 km of Route Section F.

4.8.9 Route Section F is located on 75.42 ha of agricultural land, of which 70.60 ha is BMV land (Grades 1, 2 and 3a).

4.8.10 Route Section F is located mostly in Flood Zone 1. Areas within Flood Zone 2 and 3 are associated with watercourses including Wheatley Beck, North Beck, East Drayton, and Fledborough Beck.

4.9 Relevant Planning History

4.9.1 National Grid has been reviewing all committed development proposals within or adjacent to the Order Limits and has, where relevant, made representations to the LPA to advise applicants of the Project's interaction with the planning application(s) Further details on these developments can be found in **Application Documents 6.21.A1 to 6.21.A15** and illustrated on **Application Document 6.21.F1 Environmental Statement Figure 21.1 Cumulative Effects Assessment: Long List of Other Developments** and **Application Document 6.21.F2 Environmental Statement Figure 21.2 Cumulative Effects Assessment: Short List of Other Developments**. The following section sets out an overview of those developments that overlap with the Order Limits.

Relevant Nationally Significant Infrastructure Projects

One Earth Solar Farm

4.9.2 One Earth Solar Farm is an NSIP comprising the construction of a Solar Farm and collated Battery Energy Storage System (BESS). This project is located in the High Marnham area (Route Section F) and has a connection agreement with National Grid which would allow export and import of up to 740 MW of electricity. The point of

connection will be at the proposed High Marnham substation. The proposed High Marnham substation would be constructed and operated by National Grid (further details below). The application was granted Development Consent on 8 July 2026.

4.9.3 The order limits of One Earth Solar Farm overlap with the Project in Route Section F where both One Earth Solar Farm and the Project propose a point of connection into the proposed National Grid High Marnham substation. There is also overlap in terms of some infrastructure and accesses. National Grid has engaged with One Earth Solar Ltd throughout the pre-application process on the design and development of the Project.

H2East Pipeline: Humber to Nottinghamshire

4.9.4 H2East Pipeline is a proposed Gas Transport Pipeline NSIP project from Caden Gas Ltd. It will convey hydrogen from production at North Killingholme on the Humber, and High Marnham, to industrial users across North Lincolnshire and Nottinghamshire. The application is at the pre-application stage and is expected to be submitted in December 2028. The order limits of H2East Pipeline overlap with the Project at High Marnham (Route Section F) where H2East propose to connect the HyMarnham Hydrogen Production Plant.

Steeple Renewables Project

4.9.5 Steeple Renewables is an NSIP proposed by Steeple Solar Farm Ltd comprising the construction of a Solar Farm comprising approximately 450 MW of solar energy generation and approximately 150 MW of BESS. The project will connect to the 400 kV National Grid West Burton substation which is located approximately 1 km from the Project Order Limits. Steeple Renewables was granted development consent on 9 October 2026. The Order Limits of the Project overlap the west of Steeples Renewables Site where infrastructure will be sited adjacent to the railway line west of Sturton le Steeple.

Keadby 3 Carbon Capture Power Station

4.9.6 Keadby 3 Carbon Capture Power Station is an NSIP proposed by Keadby Generation Limited for a combined cycle gas turbine (CCGT) power station comprising a CCGT unit with a capacity of up to 910 MW electric output (gross), carbon capture and compression plant, electrical, gas, and cooling water connections, and associated development. The application was granted development consent on 7 December 2022. The Order Limits of the Project overlap with Keadby 3 Carbon Capture Power Station to the east of Ealand (Route Section C), where existing accesses will be utilised off the A18.

Humber Carbon Capture Pipeline Project

4.9.7 The Humber Carbon Capture Pipeline project is an NSIP proposed by Net Zero North Sea Storage Ltd for an onshore underground CO_2 pipelines and associated above ground infrastructure to transport carbon dioxide from emitters in the Humber Region, from Drax to Easington on the East Riding of Yorkshire Coast to connect with a secure offshore storage facility in the North Sea. The application is currently at the pre-application stage with submission anticipated in February 2027.

4.9.8 The Order Limits of the Project overlap with Humber Carbon Capture Pipeline in two locations. Once in Route Section C between Keadby and Crowle near the proposed

diamond duck under and access tracks off the A18 and again in Route Section B to the southwest of Adlingfleet where access tracks and infrastructure also overlap.

East Coast Hydrogen Humber Pipeline

4.9.9 The East Coast Hydrogen Humber Pipeline is an NSIP proposed by Northern Gas Networks to convey hydrogen from production and storage locations by third-parties in the Humber Region to a range of industrial consumers across Yorkshire and the Humber, including potential connections to other third-party operated networks. The pipeline consists of the construction (including repurposing) and operation of an approximately 110 km underground high and intermediate pressure hydrogen pipeline between Saltend and Byram. It will include spurs off the main pipeline to connect with off-takers and will also include associated infrastructure (e.g. Above Ground Infrastructure such as Pressure Reduction Installations, Block Valve Stations and district governors) along the route of the pipeline. The project is in the pre-application stage with the application expected to be submitted in November 2028.

4.9.10 The Order Limits for the Project overlap with the East Coast Hydrogen pipelines order limits in Route Section A north of Cottingham at Creyke Beck and as they move south between Little Weighton and Skidby. They also overlap again north of the railway line between Broomfleet and Elloughton, south of Ellerker.

Dogger Bank D

4.9.11 Dogger Bank D Wind Farm is an NSIP proposed by Doggerbank Offshore Wind Farm Project 4 Projco Ltd for an offshore wind farm encompassing a circa 2,000 MW offshore wind farm, offshore high voltage transmission and potential onshore transmission and Hydrogen Production Facility infrastructure. The project is at the pre-application stage and is expected to be submitted in June 2027.

4.9.12 Dogger Bank D proposes an onshore grid connection of up to approximately 67 km into the proposed National Grid Birkhill Wood substation and will therefore overlap with the Project at Creyke Beck in Route Section A as they both propose connection into Birkhill Wood substation.

Dogger Bank Creyke Beck

4.9.13 Dogger Bank Creyke Beck is also an NSIP for an offshore wind farm and is the first stage of applicant Forewind Ltd's offshore wind energy development of the Dogger Bank Zone. It comprises two wind farms, each with an installed capacity of up to 1.2GW, which are expected to connect to the national grid in the East Riding of Yorkshire at the National Grid Creyke Beck substation. The offshore wind farms are located in the Dogger Bank Zone which is located between 125 to 290 km off the coast of East Yorkshire. The project received development consent on 17 February 2016.

4.9.14 Dogger Bank Creyke Beck has an onshore grid into Creyke Beck substation and therefore overlaps with the Order Limits of the Project at Creyke Beck in Route Section A as the proposed Birkhill Wood Substation is located in this area.

Dogger Bank South Offshore Wind Farms

4.9.15 Dogger Bank South Offshore Wind Farms is an NSIP comprising two offshore wind farms (Dogger Bank South West and Dogger Bank South East), and associated offshore and onshore infrastructure including offshore and onshore high voltage

electricity cables, onshore and offshore electricity substation(s), connection(s) to the National Grid and ancillary and temporary works. The applicant for this project is RWE Renewables UK Dogger Bank South (West) Ltd and RWE Renewables UK Dogger Bank South (East) Ltd and development consent was granted on 14 May 2026.

4.9.16 Dogger Bank South proposes connection at the proposed National Grid Birkhill Wood substation and will overlap with the Order Limits of the Project at this point of connection in Route Section A.

Peartree Hill Solar Farm

4.9.17 Peartree Hill Solar Farm is an NSIP by RWE Renewables UK Solar and Storage Ltd comprising the construction of a Solar Farm and collated BESS that would allow for the generation, export and storage of electricity exceeding 50 MW. The project has a generating capacity of up to 320 MW and received development consent on 2 July 2026.

4.9.18 Peartree Hill Solar Farm proposes a grid connection at National Grid Creyke Beck substation and the grid connection will therefore overlap with the Order Limits of the Project in Route Section A.

Clean Air Solar Farm

4.9.19 Clean Air Solar Farm is an NSIP proposed by Clean Air Renewables Ltd. The project comprises the construction, operation, maintenance and decommissioning of a solar PV electricity generating station and associated development, including ground-mounted solar PV modules, substation, inverters, transformers and switchgear, and export cables to the existing National Grid Creyke Beck Substation extension, Wanlass Beck. The project will have a generating capacity of approximately 500 MW. The project at the pre-application stage and is due to be submitted in June 2027.

4.9.20 The Project will overlap with Clean Air Solar in Route Section A at the proposed point of connection and with infrastructure associated with the Solar Farm north of Skidby.

Relevant TCPA Applications

4.9.21 Below is a list of selected relevant major TCPA applications that extend into or are immediately adjacent to the Order Limits. Further information on these permissions and other relevant applications can be found in **Application Documents 6.21.A1 to 6.21.A15**.

East Riding of Yorkshire Council Applications

- Creyke Beck BESS – Planning permission (Reference: 23/03926/STPLF) for the construction of a battery storage facility, approved on 25 March 2024. The application is within the Order Limits of the Project in Route Section A.
- Wanless Beck Substation – Planning permission (Reference: 24/03819/STPLF) for the erection of a 400kV electricity substation, construction of vehicular access and associated access road and diversion of Park Lane with associated works, approved on 22 December 2025. The application is within the Order Limits of the Project in Route Section A.

- Birkhill Wood Substation – Planning permission (Reference: 25/01898/STPLF) for the erection of a new 400kV electricity substation, new vehicular access, new access road and associated works, approved 27 Feb 2026. The application is within the Order Limits and proposes a point of connection for the Project.
- Wienerberger – Planning permission (Reference: 08/01805/STPLFE) for the extraction of clay and incidental sand with subsequent restoration to nature conservation use. This is included as an exception as the activity is consented until 2068 and is located approximately 0.7 km from the Order Limits in Route Section A.

North Lincolnshire Council Applications

- Pilfrey Solar Farm – Planning permission (Reference: PA/2025/444) for the construction and operation of a ground mounted solar farm, including associated equipment, infrastructure, cable route and ancillary work. The application is currently pending consideration and is located within the Order Limits in Route Section C.
- Moors Solar Farm – Planning permission (Reference: PA/2025/445) for the construction and operation of a ground-mounted solar farm, including associated equipment, infrastructure, cable route and ancillary work. The application is currently pending consideration and is located within the Order Limits at Route Section C.

Bassetlaw District Council Applications

- West Burton C BESS – Planning permission (Reference: 22/01713/FUL) for the construction and Operation of a Battery Energy Storage System with an Electrical Output Capacity of up to 500 MW and Associated Development Including Power Inverter Systems, Electrical Banking Station, Electrical Cabling including Below Ground Cabling to 400 kV Switchyard, Welfare Facilities, Internal Access Roads, Site Security Infrastructure, Lighting, Boundary Treatments, and Landscaping. The application was approved in September 2024 and is located within the Order Limits in Route Section E.
- Bumble Bee Solar Farm and BESS – Planning permission (Reference: 22/00358/FUL) for the installation of a Solar Farm and Battery Storage Facility with Associated Infrastructure, approved in July 2022. The application is located within the Order Limits in Route Section E.
- Wood Lane Solar Farm – Planning permission (Reference: 20/00117/FUL) for the installation and Operation of a Solar Farm Comprising an Array of Ground Mounted Solar PV Panels with Associated Infrastructure Including Housing for Inverters a Substation Compound, Point of Connection Mast, Fencing, Security Cameras, Cabling, Access Tracks and a Temporary Construction Compound. The application was approved in August 2020 and is located in Route Section E.
- Unit A and B High Marnham – Planning permission (Reference: 22/01071/FUL) for the erection of Unit A - A Finished Product Despatch Warehouse Building (B8 Use) and Packaging Plant (B2 Use) Including Odour Abatement Plant and Solar PV and Unit B - Raw Animal By-Product (ABP) Intermediate Storage Building (B8 Use) Incorporating Mechanical Processing Plant for Crushing, Freezing and Reloading (B2 Use) Including Odour Abatement Plant and Solar PV on Land Comprising Part of the Former High Marnham Power Station at High Marnham.

The application was approved in May 2023 and is located within the Order Limits in Route Section F at High Marnham.

- High Marnham Solar Farm – Planning permission (Reference: 22/00707/FUL) for the construction and operation of a Solar Photovoltaic(PV) Farm with other Associated Infrastructure Including Sub Stations, Security Cameras, Fencing, Storage Containers, Access Tracks and Landscaping, approved January 2023. The application is located within the Order Limits in Route Section F.
- High Marnham Green Energy Park – Planning permission (Reference: 23/01135/FUL) for the construction and operation of A Prototype Facility for the Production of Hydrogen from Ammonia, and Associated HGV Loading and Unloading Areas, Staff Welfare Building, Boundary Fencing, Internal Access Roads, External Lighting and Works, approved February 2024. The application is located within the Order Limits in Route Section F.
- High Marnham Substation – Planning permission (Reference: 25/01302/FUL) for the erection of a 400kV Air Insulated Switchgear (AIS) Substation with one 400/275kV Supergrid Transformer (SGT) and One 400/33kV SGT and Construction of 16 Bays, Gantries, Control and Amenities Building, Permanent Access Road, Diesel Generator, Parking, Drainage, Lighting and CCTV Landscaping and Biodiversity Enhancement and Security Fencing. The application was approved in June 2026 and will provide the point of connection for the Project at the southern end in Route Section F.
- Crabtree Lane BESS – Planning permission (Reference: 24/01138/FUL) for BESS, Substation, Associated Infrastructure and Works, approved June 2025. The application is located within the Order Limits in Route Section F.
- Green Hydrogen Production Plant – Planning permission (Reference: 23/00801/FUL) for proposed construction and operation of An 8 MW Electrolytic Green Hydrogen Production Plant, with Associated Infrastructure Including HGV and Multi Cylinder Pack (MCP) Loading Areas, Vehicle Maintenance Unit, Staff Welfare Facilities and Control Room, 11KV Customer Sub-Station, Boundary Fencing, Internal Access Roads, Landscaping, External Lighting and Works. The application was approved in October 2023 and is located within the Order Limits in Route Section F.
- High Marnham BESS – Planning permission (Reference: 25/00639/FUL) for the construction, operation and decommissioning of a BESS and associated infrastructure, approved July 2026. The application is located within the Order Limits in Route Section F.
- America Farm Solar – Planning permission (Reference: 26/00293/FUL) for the construction and operation of a 49.9MW Solar Photovoltaic (PV) Farm, with Associated Infrastructure and Landscaping. The application is pending consideration and is located within the Order Limits in Route Section F.
- East Drayton Solar 1 and 2 – Planning permission (References: 26/00354/FUL and 26/00353/FUL) for the construction and operation of a 49.9 MW Solar Photovoltaic ('PV') Farm with Associated Infrastructure and Landscaping. Both applications are currently pending consideration and are located within the Order Limits in Route Section E.

5. The Project

5.1 Overview

5.1.1 National Grid Electricity Transmission plc (National Grid) owns and maintains the national high voltage electricity transmission network throughout England and Wales.

5.1.2 The transmission network connects the power from where it is generated to the regional distribution network operators who then supply businesses and homes.

5.1.3 National Grid holds the Transmission Licence for England and Wales, and its statutory duty is to develop and maintain an efficient, coordinated and economical system of electricity transmission and to facilitate competition in the generation and supply of electricity, as set out in the Electricity Act 1989.

5.1.4 National Grid has developed plans for the North Humber to High Marnham Project (the Project). The Project would support the UK government's net zero target through the connection of new low carbon energy generation and by reinforcing the transmission network.

5.1.5 The Project would establish a new 400 kilovolt (kV) transmission connection approximately 90 kilometres (km) in length between a new substation to be built in the vicinity of Birkhill Wood, located to the north of Hull near Creyke Beck in the East Riding of Yorkshire, and a new substation at High Marnham in Nottinghamshire.

5.1.6 The reinforcement is needed because the existing transmission network, even with current upgrading, will not have sufficient capacity for the new renewable energy (a substantial proportion of which would be generated by offshore wind) that is expected to connect to the network over the next 10 years and beyond. Completion of the Project, together with other new reinforcements across the country, will meet this future energy transmission demand across the UK.

5.1.7 The Project is a NSIP, and National Grid is seeking development consent under the Planning Act 2008. NSIPs require a type of planning permission known as a DCO. Instead of applying to the local authority for planning permission, the developer must apply to the Secretary of State via the Planning Inspectorate for a DCO.

5.1.8 National Grid has submitted an application for development consent to the Planning Inspectorate for the Project. The Examining Authority (consisting of one or more examining inspectors), after a period of public examination, will make its recommendation to the Secretary of State for Energy Security and Net Zero, who in turn will decide on whether development consent should be granted.

5.1.9 The Project has been identified as being critical to delivering a network which supports the clean power pathways for 2030 delivery.

5.1.10 An overview of the Project has been provided in section 1.4 of this Planning Statement. This section provides a summary of the main components of the Project, in the context of **Application Document 3.1 Draft Development Consent Order** and the proposed construction and maintenance activities. The design is shown on **Application Document 2.4 Works Plans**.

5.2 Definition of the Project in the DCO

5.2.1 Article 3 of **Application Document 3.1 Draft Development Consent Order** provides that, subject to the provisions of the Order including the requirements in Schedule 2, development consent is granted for the 'authorised development'.

5.2.2 For this purpose, 'authorised development' is defined in Article 2 of **Application Document 3.1 Draft Development Consent Order** as meaning 'development described in Schedule 1 (authorised development), and any other development authorised by this Order, which is development within the meaning of section 32 of the 2008 Act'.

5.2.3 Schedule 1 of **Application Document 3.1 Draft Development Consent Order** applies the following Works Numbers to the Project.

Work No. 1 – overhead electric line from Birkhill Wood Substation to Riplingham

5.2.4 Works shown commencing on Section A Sheet 1 and terminating on Section A Sheet 6 of the works plans to construct and install line entries associated with the overhead electric line (Route 4AF) to the two gantries (4AF1 and 4AF2) within the proposed Birkhill Wood Substation, and to construct and install a new overhead electric line (Route 4AF) between the two gantries at the proposed Birkhill Wood Substation and Pylon 4AF33, including—

- the installation of conductors, insulators and fittings including downleads and downdroppers at each gantry to facilitate connection to the equipment within the Birkhill Wood Substation;
- the installation of fibre optic conductors, with optical fibre terminated in joint boxes;
- the foundations and steelwork to construct new pylons;
- the installation of approximately 10 kilometres of overhead electric line between the two gantries at Birkhill Wood Substation and Pylon 4AF33; and
- the installation of one temporary construction compound.

Work No. 2 – overhead electric line from Riplingham to Ellerker

5.2.5 Works shown commencing on Section A Sheet 6 and terminating on Section A Sheet 9 of the works plans to construct and install a new overhead electric line and modify existing overhead electric line (Route 4AF) between Pylon 4AF33 and Pylon 4AF52, and to install new overhead electric line, and reconfigure and modify an existing overhead electric line (Route 4ZQ) between Pylon 4ZQ80 and Pylon 4ZQ63 including—

- works to approximately 6.4 kilometres of overhead electric line between Pylon 4AF33 and Pylon 4AF52 including—
  - the installation of approximately 1.2 kilometres of new overhead electric line between Pylon 4AF33 and 4AF37;
  - the modification of approximately 3.9 kilometres of existing overhead line between Pylon 4AF37 and Pylon 4AF48;

- the installation of approximately 1.3 kilometres of new overhead electric line between Pylon 4AF48 and Pylon 4AF52; and
- the removal of approximately 1.3 kilometres of existing overhead electric line between Pylon 4AF48 and Pylon 4ZQ63, including removal of Pylons 4ZQ64T, 4ZQ65T, 4ZQ66T and 4ZQ67T with partial removal of foundations, and removal of conductors, insulators and fittings;

- works to approximately 6 kilometres of overhead electric line between Pylon 4ZQ81 and Pylon 4ZQ63 including—
  - the installation of approximately 5.4 kilometres of new overhead electric line between Pylon 4ZQ79A and 4ZQ63;
  - the modification of approximately 0.6 kilometres of existing overhead line between Pylon 4ZQ80 and Pylon 4ZQ79A;
  - the removal of approximately 0.2 kilometres of existing overhead line between Pylon 4ZQ79A and 4AF37; and
  - the construction and installation (and subsequent decommissioning and removal) of approximately 0.8 kilometres of temporary overhead line between 4ZQ80 and 4AF37;
- the foundations and steelwork to construct new pylons and modifications to existing apparatus including foundations, steelwork, replacement of conductors, insulators and fittings;
- the installation of fibre optic conductors and associated joint boxes; and
- the installation of one temporary construction compound.

Work No. 3 –overhead electric line from Ellerker to Yokefleet

5.2.6 Works shown commencing on Section A Sheet 9 and terminating on Section A Sheet 16 of the works plans to construct and install a new overhead electric line (Route 4AF) between Pylon 4AF52 and Pylon 4AF76, including—

- the foundations and steelwork to construct new pylons;
- the installation of approximately 8.3 kilometres of overhead electric line between Pylon 4AF52 and Pylon 4AF76;
- the installation of conductors, insulators and fittings;
- the installation of fibre optic conductors;
- the installation of one temporary construction compound; and
- modification of fittings and conductor on Pylon 4ZQ62 to facilitate the works to Route 4ZQ in Works No 2.

5.2.7 In the districts of East Riding of Yorkshire Council and North Lincolnshire Council

5.2.8 Work No. 4 –overhead electric line from Yokefleet to Crowle

5.2.9 Works shown commencing on Section A Sheet 16 and terminating on Section B Sheet 8 of the works plans to construct and install a new overhead electric line (Route 4AF) between Pylon 4AF76 and Pylon 4AF114, including—

- the foundations and steelwork to construct new pylons;

- the installation of approximately 13.8 kilometres of overhead electric line between Pylon 4AF76 and Pylon 4AF114;
- the installation of conductors, insulators and fittings;
- the installation of fibre optic conductors; and
- the installation of one temporary construction compound

Work No. 5 – overhead electric line from Crowle to Woodhouse

5.2.10 Works shown commencing on Section B Sheet 8 and terminating on Section C Sheet 5 of the works plans to construct and install a new overhead electric line (Route 4AF) between Pylon 4AF114 to Pylon 4AF128 and to install a new overhead electric line and reconfigure and modify an existing overhead electric line (Route ZDA) between Pylon ZDA116 and Pylon ZDA123 including—

- the foundations and steelwork to construct new pylons;
- the installation of approximately 4.7 kilometres of overhead electric line between Pylon 4AF114 and Pylon 4AF128;
- the installation of fibre optic conductors and associated joint boxes;
- the installation of one temporary construction compound;
- the reconfiguration and modification of the existing overhead electric line (Route ZDA) between Pylon ZDA116 and Pylon ZDA123 including:
  - the removal of approximately 0.5 kilometres of existing overhead electric line between Pylons ZDA119A and ZDA120 including the dismantling of existing Pylons ZDA119 and ZDA120, with partial removal of foundations, and removal of conductors, insulators and fittings;
  - the construction and installation of new Pylons ZDA119A, ZDA119B, ZDA119C, ZDA120A, ZDA120B and ZDA120C;
  - the installation of approximately 0.5 kilometres of new overhead electric line between Pylons ZDA119A and ZDA120C via Pylons ZDA119B and ZDA119C, and approximately 0.53 kilometres between Pylons ZDA119A and ZDA120C via Pylons ZDA120A and ZDA120B;
  - the foundations and steelwork to construct new Pylons;
  - the replacement of approximately 1.93 kilometres of conductors, earthwire, insulators and fittings between and at Pylons ZDA116 to ZDA119A and Pylons ZDA120C to ZDA123, including connections at Pylons ZDA116 and ZDA123;
  - the modification of foundations and steelwork; and
  - the installation of fibre optic conductors and associated joint boxes.
- the construction and installation (and subsequent decommissioning and removal) of approximately 1.4 kilometres of temporary overhead electric line, between existing Pylon ZDA117 and existing Pylon ZDA121.

5.2.11 In the districts of North Lincolnshire Council and Bassetlaw District Council

Work No. 6 – overhead electric line from Woodhouse to High Marnham Substation

5.2.12 Works shown commencing on Section C Sheet 5 and terminating on Section F Sheet 3 of the works plans to construct and install a new overhead electric line (Route 4AF) between Pylon 4AF128 and the two gantries (4AF259 and 4AF260) at High Marnham Substation, and to construct and install the line entries associated with the overhead electric line (Route 4AF) and the two new gantries at the proposed High Marnham Substation, including—

- the foundations and steelwork to construct new pylons;
- the installation of approximately 45.2 kilometres of overhead electric line between pylon 4AF128 and the two gantries at High Marnham Substation;
- the installation of conductors, insulators and fittings including downleads and downdroppers at each gantry to facilitate connection to the equipment within the High Marnham Substation;
- the installation of fibre optic conductors, with optical fibre terminated in joint boxes; and
- the installation of four temporary construction compounds.

5.3 Description of Project Components

5.3.1 This section provides a high-level description of the key Project components. Further details can be found in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project**.

Overhead Line

5.3.2 The overhead line would comprise conductors supported by pylons. A typical pylon operating at 400 kV is approximately 50-60 m in height. A typical span distance between pylons is approximately 350 m. In broad terms there are typically three pylons for every kilometre of overhead line.

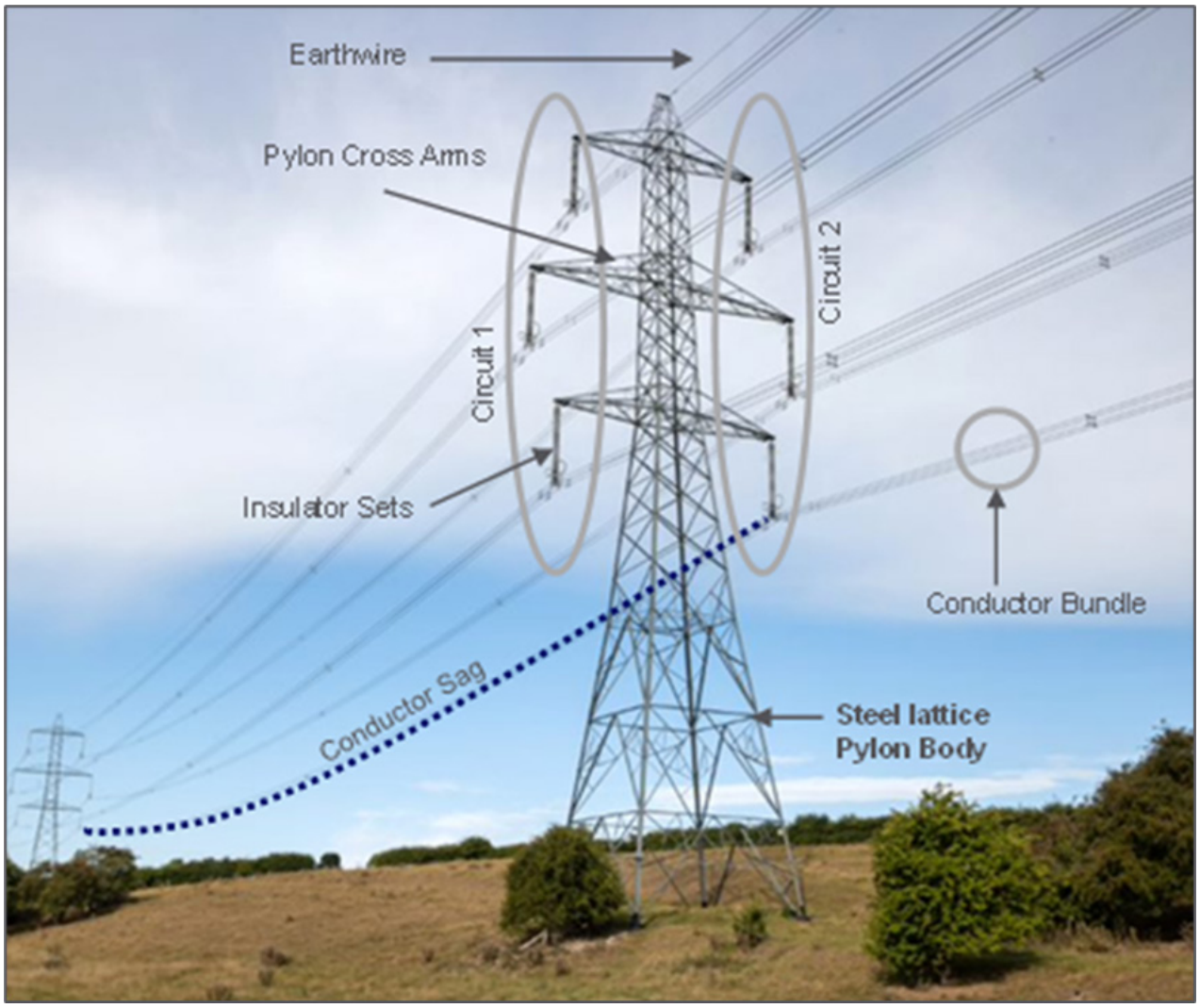
5.3.3 Pylons are in general either: suspension pylons (from which the conductor is simply suspended) or tension (angled) pylons (more robust structures that hold conductors in tension where the alignment of an overhead line changes direction or to maintain tension in long straight sections of the route). An example of a suspension pylon is illustrated in **Application Document 2.12 Typical Design Drawings** - Design Drawing Illustrative Suspension Lattice Pylon Sheet 2 of 19 and an example of a tension pylon is illustrated on **Application Document 2.12 Typical Design Drawings** Illustrative Tension Lattice Pylon Sheet 3 of 19. In some locations, such as on the overhead line entries to the proposed Birkhill Wood and High Marnham Substations (which have been authorised separately under the Town and Country Planning Act 1990 (HM Government, 1990) consenting procedures), terminal pylons are required. **Application Document 6.4.A1 Environmental Statement Appendix 4.1 Indicative Pylon Schedule** sets out which pylons are proposed to be suspension and those which are proposed to be tension pylons.

5.3.4 The conductors would be connected to the pylon by an insulator assembly consisting of a set of insulators (components made from a material with a high resistance to the flow of electric current such as glass, polymeric or porcelain) and steel fittings and

conductor clamps. Additional fittings, such as spacers and vibration dampers, would be fitted to the conductors. Spacers prevent the conductors from touching each other and vibration dampers prevent oscillations from the conductors from reaching the insulator fittings and minimise effects of fatigue loading. Arcing horns protect insulators from damage due to dangerous electrical conditions, such as over voltages due to electrical faults or lightning strikes.

5.3.5 The main components of an overhead line are shown in Image 5.1, which shows a typical steel lattice suspension pylon.

Image 5.1 – Components of a typical overhead transmission line



5.3.6 Where the route of the overhead line changes direction, tension pylons are required to accommodate the additional sideways strains with the insulators tensioning the conductors horizontally to keep conductors aligned. This is illustrated on Image 5.2

Image 5.2 – Indicative suspension pylon (left) and tension pylon (right)



Proposed Pylons

5.3.7 The pylons for the Project would comprise steel lattice with three arms on either side of a central body. **Application Document 2.12 Typical Design Drawings** Illustrative Lattice Pylons Sheet 4 of 19 and Sheet 5 of 19, provides an illustration of the type of pylon proposed for the Project alongside illustrations of the existing pylon types. **Application Document 2.12 Typical Design Drawings** Illustrative Lattice Pylon Footprints Sheet 7 of 19 provides an illustration of the footprints of the pylons.

5.3.8 Typical heights for steel lattice pylons operating at 400 kV are around 50-60 m; however, the proposed height of each pylon would depend on the specifics of each location such as topography, land use and crossings. For example, the proposed height of the proposed River Ouse crossing pylons (4AF77 and 4AF78) is 128.6 m. These pylons need to be tall enough so that the conductors have sufficient clearance to the navigable river and can be sited outside of the designated sites and flood defences, increasing the span length and therefore pylon height.

5.3.9 Indicative typical pylon heights for the Project are provided in **Application Document 6.4.A1 Environmental Statement Appendix 4.1 Indicative Pylon Schedule** and are illustrated on **Application Document 2.12 Typical Design Drawings** Min-Max Lattice Pylons Sheet 6 of 19.

Proposed Conductors and Insulators

5.3.10 The conductor bundle for the proposed 400 kV overhead line and sections on the existing 400 kV 4ZQ overhead line which require reconductoring would be Triple Araucaria (700 mm² All Aluminium Alloy Conductor (AAAC)) or alternative technology

that performs to the same or better standard in relation to noise on standard lattice pylons.

5.3.11 The conductor bundle for the proposed replacement and realignment of a section of the existing 400 kV ZDA overhead line route between Ealand and west of Keadby would be Twin Rubus (500 mm² AAAC), or alternative technology that performs to the same or better standard in relation to noise on standard lattice pylons.

5.3.12 Whilst the indicative design has been based on the conductor types stated above, flexibility on conductor type is required at the River Ouse crossing between proposed pylons 4AF76 and 4AF80 as further work would be required during detailed design to confirm the conductor type for this section. The preliminary design considers the use of Triple Araucaria bundle conductor and glass insulators; however, these will need to be confirmed during detailed design stage, as an alternative river crossing conductor of equivalent capacity and reliability may be needed.

5.3.13 Suspension pylons would typically have a single insulator string hanging vertically downwards from each crossarm end to carry the conductor bundle. For tension pylons, the number of insulator strings would typically equal the number of conductors within the bundle (e.g. three insulator strings for a triple conductor bundle) and these would be orientated horizontally outwards from the crossarm ends and take the tension of the conductors.

5.3.14 Insulators can be made of different types of material, but the most common industry standard is either glass, porcelain, or polymeric.

Line Swap Overs

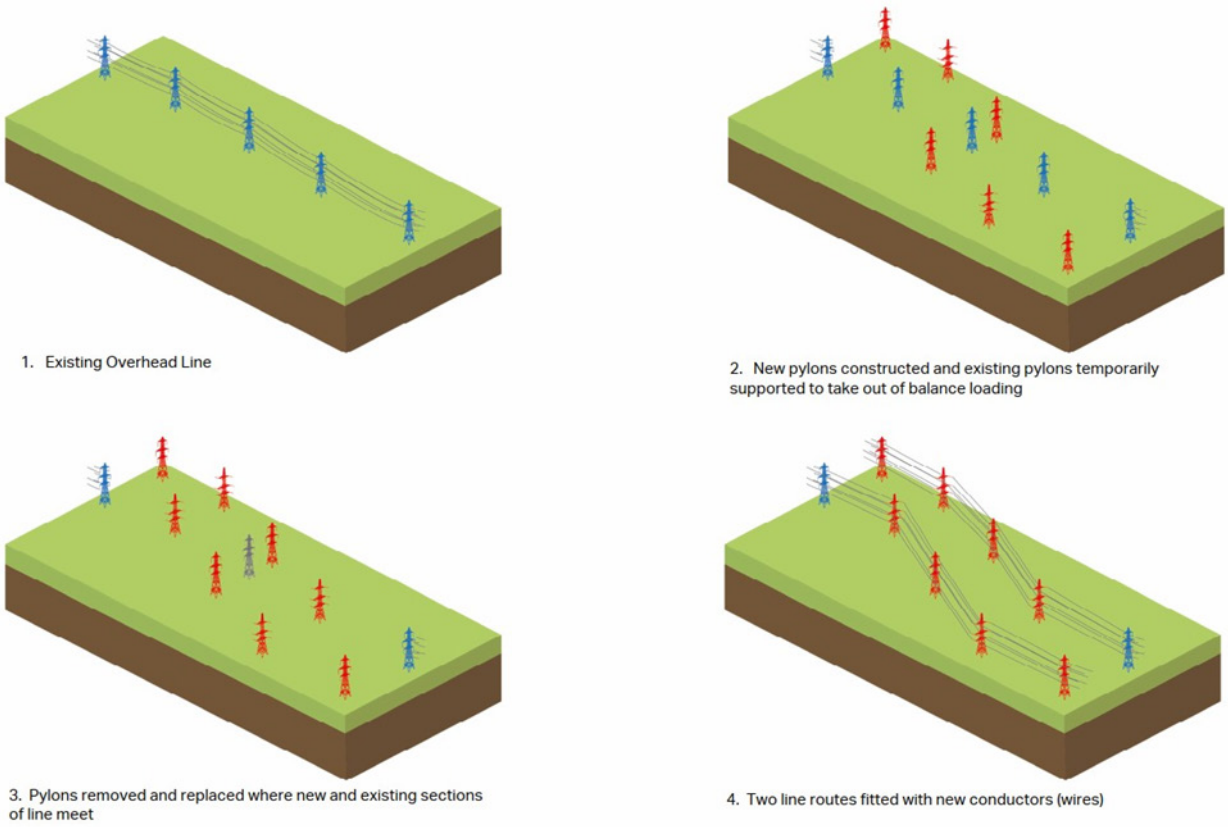
5.3.15 Line swap overs comprise reconfiguration of an existing overhead line to allow the overhead line routes to remain parallel without the need for a line ‘duck-under’. Line swap overs allow for the continuation of a route from a section of new pylons to a section of existing pylons, whilst the parallel route is a continuation of a route from a section of existing pylons to a section of new pylons.

5.3.16 Line swap overs are achieved by removing a section of existing line and forming two unconnected ends, which are then each connected to a new line approaching from either side. A line swap over is illustrated schematically on Image 5.3.

5.3.17 Temporary diversions of localised sections of the existing route may also be required to ensure continuity of supply on the affected routes.

5.3.18 The Project includes two line swap overs in Route Section A.

Image 5.3 – Line swap over



5.4 Order Limits

5.4.1 The Order Limits are defined as the maximum extent of land within which the Project, as described in this section, may be carried out. They include both permanent and temporary land required to construct, operate and maintain the Project. The Order Limits are illustrated on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.

5.5 Flexibility and Limits of Deviation

5.5.1 As set out in Nationally Significant Infrastructure Projects: Pre-Application Advice on Environmental Impact Assessment (Planning Inspectorate, 2026) it is recognised that a necessary and proportionate degree of flexibility needs to be incorporated into the design of a development. This flexibility is required so that unforeseen issues encountered after a development has received consent to be addressed. It also allows a project to be assessed on a worst-case basis and provides an opportunity for developers to integrate different components into a scheme that may be more beneficial. Therefore, to allow for this degree of flexibility, Limits of Deviation (LoD) have been developed for the Project components which are detailed in **Application Document 3.1 Draft Development Consent Order**. The LoD provide a maximum distance or measurement of variation within which every component of the Project would be located.

5.5.2 In respect of a 400 kV overhead line, LoD have been applied horizontally and vertically.

Horizontal

5.5.3 The horizontal LoD are generally 100 m (50 m either side of the centre line). In certain locations this has been reduced to less than 100 m to avoid a particular receptor and, in some locations, the LoD are wider to allow for additional flexibility.

5.5.4 Where the LoD is 100 m the extent of movement of any pylon is limited by the span length and conductor swing. Typically, pylons can move 30 m whilst still allowing the conductors to remain within the full 50 m LoD. However, at a maximum span length, the centre of the pylon could move approximately 20 m either side of the centreline subject to topography and local conditions.

5.5.5 The proposed horizontal LoD are shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design** and an example of how the LoD could be utilised is shown on **Application Document 2.12 Typical Design Drawings** Overhead Line Limits of Deviation Sheet 9 of 19.

5.5.6 There is no limit placed on the movement of a pylon along the centreline (longitudinal LoD). The movement along the preferred alignment is constrained by the maximum span the pylon can withstand, the different structural loads acting on the conductors and the rest of the equipment, and the need to maintain statutory clearances to ground and obstacles whilst not exceeding the vertical LoD described below.

Vertical

5.5.7 The upwards vertical LoD for a typical standard lattice pylon are approximately +6 m which would allow for two extension panels (typically +3 m per extension panel but this varies between pylon types). Vertical LoDs are provided for each pylon in **Application Document 6.4.A1 Environmental Statement Appendix 4.1 Indicative Pylon Schedule**.

5.5.8 There are certain locations where bespoke pylons are required, such as at the River Ouse crossing. In these specific locations, the vertical LoD would be greater than +6 m. The vertical LoD for each proposed pylon are set out in **Application Document 6.4.A1 Environmental Statement Appendix 4.1 Indicative Pylon Schedule**.

5.5.9 There is no limit placed on the maximum depth of below ground works. While a standard below ground LoD is not proposed, the Project would never go deeper than necessary for technical or environmental reasons as this would add engineering operational complexity and cost.

5.6 Environmental Mitigation Measures Within Project Design

5.6.1 The mitigation hierarchy is a stepped process that helps development projects to address potentially adverse effects on the environment. NPS EN-1 (Department for Energy Security and Net Zero, 2025) states '*the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy*' (paragraph 4.3.4). The EIA Regulations (Regulation 14(2)(c)) (HM Government, 2017) also requires an ES to include '*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*'.

5.6.2 The mitigation hierarchy has been applied to the Project throughout the iterative design process and with the following considered:

- Avoid – the first step of the mitigation hierarchy comprises measures taken to avoid creating effects from the outset, such as careful spatial placement of infrastructure away from receptors, or timing construction sensitively to avoid their disturbance.
- Prevent – these include measures to remove the effect at source or disrupt the impact pathway, such as adopting standard pollution prevention techniques in line with good practice to prevent watercourses becoming polluted.
- Reduce – these are measures taken to reduce the duration, intensity and/or extent of effects that cannot be completely avoided, for example acoustic screening of noisy construction activities or landscape planting to filter views during operation.
- Offset (sometimes referred to as compensate) – where relevant and appropriate to the specific effect, these measures aim to compensate for any residual adverse effects after full implementation of the previous three steps of the mitigation hierarchy.

Embedded, Control and Management, and Additional Mitigation Measures

5.6.3 The Project will adopt a range of measures to avoid and reduce the likely significant effects that are expected during implementation of the Project. These include embedded measures, control and management measures, and additional mitigation measures.

5.6.4 Embedded mitigation seeks to avoid an impact and is intrinsic to and built into the design. This includes, for example, routeing and siting the proposed overhead line within the existing topography to reduce pylon intrusion, siting the proposed overhead line in close parallel to existing transmission lines as far as possible, inclusion of clear span bridges for the temporary crossings of certain watercourses, and inclusion of environmental commitments to protect and retain certain features within the Order Limits.

5.6.5 Control and management measures comprise management activities, control measures and techniques that would be implemented during construction of the Project to limit impacts. This includes adherence to good site practices and achieving legal compliance. These measures may include, for example, applying construction site dust suppression techniques within working areas.

5.6.6 Additional mitigation measures comprise measures over and above any embedded and control and management measures, for which the EIA has identified a requirement to further reduce significant environmental effects. These include landscape planting for the loss of landscape features that it has not been possible to avoid, and to filter views from settlements.

5.6.7 Three types of mitigation have been incorporated into the Project and assessment: embedded, control and management, and additional. These are described in **Application Document 6.5 Environmental Statement Chapter 5 EIA Approach and Methodology**.

5.6.8 **Application Document 7.3 Register of Environmental Actions and Commitments** sets out all mitigation measures categorised by type and each mitigation measure has been assigned a specific reference. These are referenced where relevant in each ES chapter with any monitoring measures where appropriate.

5.6.9 Mitigation measures have been defined in each relevant chapter in **Volume 6 Environmental Statement** and are secured in:

- **Application Document 7.2 Outline Code of Construction Practice;**
- **Application Document 7.3 Register of Environmental Actions and Commitments;**
- **Application Document 7.4 Outline Construction Traffic Management Plan;**
- **Application Document 7.5 Outline Soil Management Plan;**
- **Application Document 7.6 Outline Public Rights of Way Management Plan;**
- **Application Document 7.7 Outline Noise and Vibration Management Plan;**
- **Application Document 7.8 Outline Landscape and Ecology Management Plan;**
- **Application Document 7.9 Outline Archaeological Written Scheme of Investigation;** and
- **Application Document 7.10 Outline Cultural Heritage Management Plan.**

5.6.10 Areas of additional environmental mitigation have been included within the Order Limits. These areas are illustrated on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design** and described in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.13 Flood Risk Assessment** (where they relate to flood compensation). These areas include land for:

- Landscape planting areas to reinstate taller vegetation removed to construct the Project which cannot be reinstated under the proposed overhead line and areas to mitigate effects on landscape features;
- Protected species mitigation areas to provide habitat for protected species that cannot be avoided through embedded measures;
- Flood compensation;
- Functionally linked land offsetting; and
- Veteran tree compensation.

5.6.11 In recent years, the UK Government has introduced legislation and policy that puts biodiversity at the heart of the planning system. Defra describes BNG as an approach to development that makes sure habitats for wildlife are left in a measurably better state than they were before development (Defra, 2026). The statutory requirement for NSIPs to achieve a specified biodiversity gain objective (as set out in a biodiversity gain statement) will be mandatory for applications made from 2 November 2026. The biodiversity gain objective for energy NSIPs, as set out in Nationally Significant Infrastructure Projects: Biodiversity Gain Statement for Energy (Defra, 2026), will require that the biodiversity value attributable to a development

exceeds the pre-development biodiversity value of the on-site habitat by at least 10%. This is referred to as 10% BNG.

5.6.12 The Project application for development consent is being submitted prior to 2 November 2026 and therefore the provision of 10% BNG is not mandatory. Notwithstanding, the Overarching National Policy Statement for Energy (EN-1) (Department for Energy Security and Net Zero, 2025) states that NSIPs should seek opportunities to provide BNG, including wider environmental gains and benefits to local communities and national policy priorities, where possible, and the Secretary of State should give appropriate weight to environmental net gain and BNG during decision making. However,10% BNG is not a legal requirement for this application for development consent.

5.6.13 National Grid's environmental and social commitments in its Social and Environmental Action Plan (National Grid, 2026) include a commitment to deliver a minimum of 10% BNG with potential for wider environmental and societal benefits for all developments for which planning permission or development consent is required. Therefore, the Project proposes to deliver 10% BNG with potential for wider environmental and societal benefits on a voluntary basis, and substantively follows the guidance set out in Nationally Significant Infrastructure Projects: Biodiversity Gain Statement for Energy (Defra, 2026).

5.6.14 Detail on the Project's approach to voluntary BNG is provided in **Application Document 7.20 Design Development Report - 2025** and **Application Document 7.1 Biodiversity Net Gain Report**.

5.7 Construction

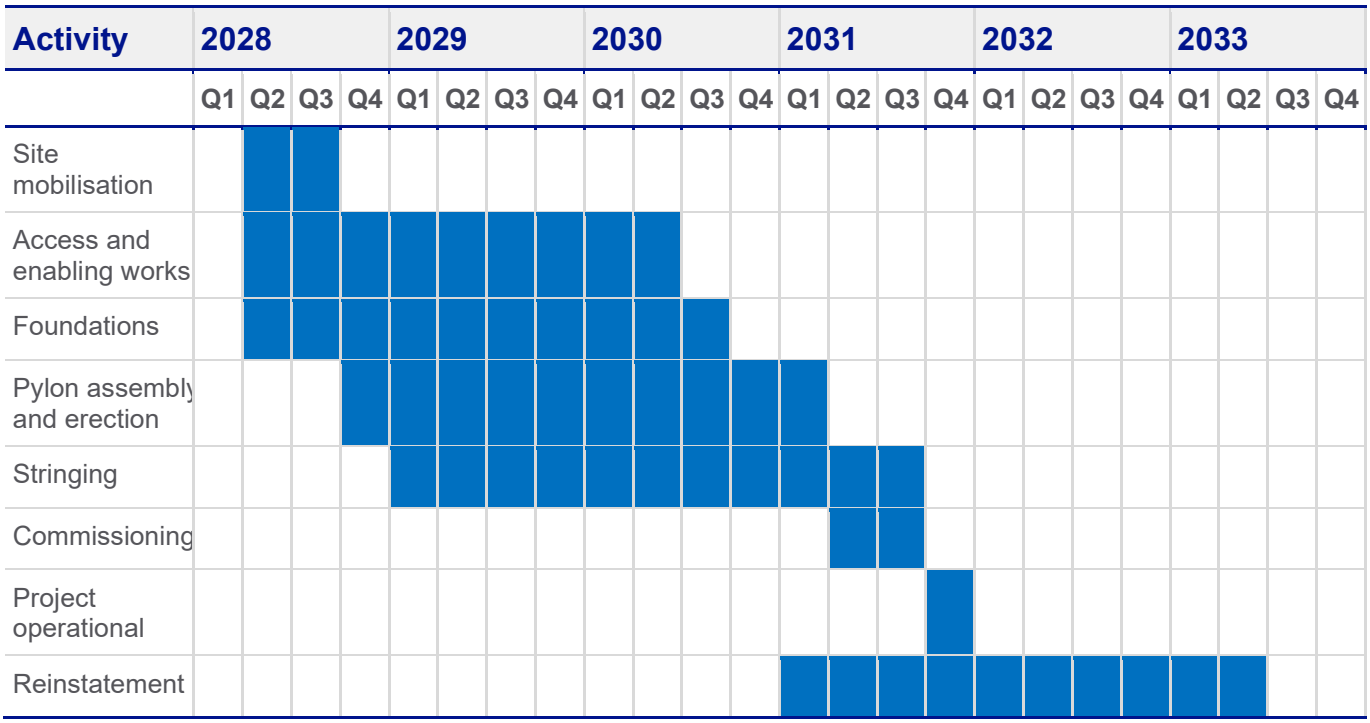
Construction Programme

5.7.1 Subject to gaining development consent, construction works would be expected to start in 2028. The proposed overhead line would be available for commercial load (operational) by the end of 2031, with reinstatement works continuing into 2032 and potentially 2033. Certain preparatory works and measures may take place in advance of the commencement of construction authorised by the Order. Examples of such works and measures include archaeological trenching, ground investigations and the implementation of environmental mitigation, including protected species mitigation.

5.7.2 The construction schedule will be developed as the Project progresses and will take account of seasonal constraints such as protected species breeding or hibernation seasons, and reducing impacts associated with working within flood zones.

5.7.3 Due to the linear nature of the Project, construction activities would be transient, moving along the length of the working area over time.

Image 5.4 – Indicative construction programme



Construction Workforce

5.7.4 Over the six-year construction phase there would be a maximum peak year where approximately 626 Full Time Equivalent (FTE) employees would be working on the Project. This is illustrated in Image 5.4. Employees would be spread across the various works sites along the 90 km Project.

Construction Hours

5.7.5 Core working hours for construction are set out in **Application Document 3.1 Draft Development Consent Order**, and are as follows:

- Monday to Friday, 07:00–19:00; and
- Saturday, Sunday and public holidays, 08:00–17:00.

5.7.6 The core construction working hours exclude start-up and close-down activities, which would take up to one hour before and after the core construction working hours.

5.7.7 Unless otherwise agreed with the local highway authority, no heavy goods vehicle (HGV) deliveries would be made to site outside of the hours of 06:00 to 19:00 Monday to Friday and 07:00 to 17:00 on Saturdays, Sundays and public holidays.

- The following typical operations may take place outside of the proposed core working hours:
- Trenchless crossing operations including beneath highways, utilities, pipelines, railway lines, woodlands, nature reserves or watercourses;
- The installation and removal of conductors, pilot wires and associated protective netting (included but not limited to) across highways, railway lines or watercourses;

- The jointing of underground cables;
- The completion of operations commenced during the core working hours which cannot safely be stopped;
- Any highway works or works within the highway where the relevant highway authority has requested such works to be undertaken outside the core working hours;
- The testing or commissioning of any electrical plant installed as part of the authorised development including undertaking of any identified corrective activities;
- The completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities;
- Activity necessary in the instance of an emergency where there is a risk to persons or property;
- Security monitoring;
- Non-intrusive surveys;
- Intrusive surveys;
- The installation and removal of temporary bridges including the installation of any safety systems;
- Delivery of abnormal indivisible loads; and
- Mechanical and electrical installation works within buildings once erected and enclosed.

5.8 Requirements of the Draft DCO

5.8.1 Schedule 2 of **Application Document 3.1 Draft Development Consent Order** contains the draft Requirements proposed for inclusion in the draft DCO, should development consent be granted. A number of draft Requirements include elements which would require the submission of, and approval by, the relevant LPA prior to the commencement of the Project, as well as those that National Grid must comply with during construction.

5.8.2 National Grid also notes that the government's response to the Nuclear Regulatory Review 2025 (Fingleton Review) confirms that the Department for Energy Security and Net Zero (DESNZ) will establish a new unit (DESNZ Unit) to deal with post-consent discharge functions for electricity networks projects such as the Project.

5.8.3 The draft Requirements will be subject to examination and may, as a result, be amended. Requirements are included in **Application Document 3.1 Draft Development Consent Order** and summarised in **Application Document 3.2 Explanatory Memorandum**. The requirements included in **Application Document 3.1 Draft Development Consent Order** comprise:

Requirement 3: Stages of authorised development

5.8.4 3(1) The authorised development may not commence until a written scheme setting out the stages of the authorised development has been submitted to the relevant

planning authority, such scheme may subsequently be amended from time to time as notified to the relevant planning authority.

5.8.5 3(2) The authorised development must be constructed in accordance with the written scheme setting out the stages of the authorised development submitted under sub-paragraph (1).

Requirement 4: Construction Management Plans

5.8.6 4(1) No stage of the authorised development may commence until, for that stage, the following plans as relevant to that stage have been submitted to and approved by the relevant planning authority (following consultation with Natural England in the case of the landscape and ecology management plan and relevant highway authority in the case of the construction traffic management plan and public rights of way management plan). The relevant plans are—

- (a) code of construction practice (which must be substantially in accordance with the outline code of construction practice);
- (b) construction traffic management plan (which must be substantially in accordance with the outline construction traffic management plan);
- (c) landscape and ecology management plan including a landscape maintenance and management plan (which must be substantially in accordance with the outline landscape and ecology management plan); and
- (d) public rights of way management plan (which must be substantially in accordance with the outline public rights of way management plan);
- (e) soil management plan (which must be substantially in accordance with the outline soil management plan);
- (f) noise and vibration management plan (which must be substantially in accordance with the outline noise and vibration management plan);
- (g) archaeological written scheme of investigation (which must be substantially in accordance with the outline archaeological written scheme of investigation); and
- (h) cultural heritage management plan (which must be substantially in accordance with the outline cultural heritage management plan).

5.8.7 4(2) Each stage of the authorised development must be carried out in accordance with the approved plans referred to in sub-paragraph (1), unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned.

5.8.8 4(3) For the avoidance of doubt, all pre-commencement operations must be carried out in accordance with the outline plans as listed in sub-paragraph (1) above unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned.

Requirement 5: Register of Environmental Actions and Commitments

5.8.9 5. Each stage of the authorised development, including any pre-commencement operations, must be carried out in accordance with the register of environmental

actions and commitments unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate.

Requirement 6: Construction hours

5.8.10 6(1) Subject to sub-paragraphs (2) to (5) work may only take place between the hours of 07.00 and 19.00 Monday to Friday and 08.00 and 17.00 on Saturdays, Sundays, bank holidays and other public holidays (the core working hours), unless otherwise approved by the relevant planning authority.

5.8.11 6(2) Subject to sub-paragraphs (4) and (5), no heavy goods vehicle deliveries may be made to site outside of the hours of 06.00 to 19.00 Monday to Friday and 07.00 to 17.00 on Saturdays, Sundays and public holidays, unless otherwise approved by the relevant highway authority.

5.8.12 6(3) The following operations may take place outside the core working hours referred to in sub-paragraphs (1) and (2)—

- (a) trenchless crossing operations including beneath highways, utilities, pipelines, railway lines, woodlands, nature reserves, or watercourses;
- (b) the installation and removal of conductors, pilot wires and associated protective netting (included but not limited to) across highways, railway lines or watercourses;
- (c) the jointing of underground cables;
- (d) the completion of operations commenced during the core working hours which cannot safely be stopped;
- (e) any highway works requested by the relevant highway authority or the DESNZ unit to be undertaken outside the core working hours;
- (f) the testing or commissioning of any electrical plant installed as part of the authorised development including undertaking of any identified corrective activities;
- (g) the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities;
- (h) activity necessary in the instance of an emergency where there is a risk to persons or property;
- (i) security monitoring;
- (j) non-intrusive surveys;
- (k) intrusive surveys;
- (l) the installation and removal of temporary bridges including the installation of any safety systems;
- (m) delivery of abnormal indivisible loads; and
- (n) mechanical and electrical installation works within buildings once erected and enclosed.

5.8.13 6(4) The core working hours exclude start-up and close down activities up to 1 hour either side of the core working hours.

5.8.14 6(5) The severe weather conditions referred to in sub-paragraph (3)(g) means any weather which prevents work from taking place during the core working hours referred to in sub-paragraph (1) and, as the case may be, the hours referred to in sub-paragraph (2) by reason of physical incapacity (whether for reasons of visibility, ground conditions, power availability, site access or otherwise) or being contrary to safe working practices.

Requirement 7: Retention and removal of trees, woodland and hedgerows

5.8.15 7(1) Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may commence until, for that stage, an arboricultural method statement, including a tree protection plan, showing the trees, groups of trees, woodlands and hedgerows to be retained and/or removed during that stage has been submitted to and approved by the relevant planning authority.

5.8.16 7(2) The statement referred to in sub-paragraph (1). must include—

- (a) schedule of all proposed tree and hedgerow removal and management;
- (b) specification for temporary physical protection including clearly defined root protection areas to prevent damage / compaction of roots by machinery; and
- (c) details of an auditable system of compliance.

5.8.17 7(3) The relevant works in proximity to the protected tree or hedgerow must not commence until the approved protection measures referred to in sub-paragraph (2) are in place, and they must thereafter be maintained during the construction of the relevant stage of the authorised development.

5.8.18 7(4) The authorised development must proceed in accordance with the statement referred to in sub-paragraph (1) unless otherwise approved by the relevant planning authority.

Requirement 8: Reinstatement planting plan

5.8.19 8(1) Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may be brought into operational use until, for that stage, a reinstatement planting plan for trees, groups of trees, woodlands and hedgerows to be reinstated during that stage has been submitted to and approved by the relevant planning authority.

5.8.20 8(2) The reinstatement planting plan submitted under sub-paragraph (1) must include a schedule of trees, hedgerows or other plants or seedlings to be planted, noting numbers, species, sizes and planting density of any proposed planting or seedlings.

5.8.21 8(3) The reinstatement planting plan submitted under sub-paragraph (1) must be in general accordance with the outline landscape and ecology management plan (or the final landscape and ecology management plan if approved pursuant to requirement 4).

5.8.22 8(4) Unless otherwise agreed with the relevant planning authority, all reinstatement planting works approved under sub-paragraph (1) must be implemented at the earliest opportunity and no later than by the first available planting season after that part of the authorised development to which the reinstatement planting works apply is first brought into operational use.

5.8.23 8(5) All reinstatement planting works approved under sub-paragraph (1) must be carried out in accordance with the approved reinstatement planting plan for that stage of the authorised development, unless otherwise approved by the relevant planning authority.

5.8.24 8(6) All reinstatement planting works approved under sub-paragraph (1) must be implemented, monitored and maintained in accordance with the 'Aftercare' section of the landscape and ecology management plan approved pursuant to requirement 4.

5.8.25 8(7) Any trees or hedgerows planted as part of an approved reinstatement planting plan that, within a period of five years after planting (or such other period as is specified in the landscape and ecology management plan approved pursuant to requirement 4), are removed, die or become in the opinion of the relevant planning authority seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species and size as that originally planted, unless otherwise approved by the relevant planning authority.

Requirement 9: Reinstatement schemes

5.8.26 9(1) Subject to sub-paragraphs (2) and (3), any land within the Order limits which is used temporarily for construction is to be reinstated to a condition suitable for its former use, or such condition as the relevant planning authority may approve, within 21 months of completion of the construction of the stage of authorised development for which it was required, or such further time as may be approved by the relevant planning authority.

5.8.27 9(2) The requirement to reinstate the land to a condition suitable for its former use does not apply to land above or within 10 metres of underground cables installed as part of the authorised development.

5.8.28 9(3) The requirement to reinstate the land to a condition suitable for its former use is subject to the provisions of Article 27 (temporary use of land by National Grid), Article 28 (temporary use of land by NGED), Article 29 (temporary use of land by NPG), Article 30 (temporary use of land by BT) and Article 31 (temporary use of land for maintaining the authorised development).

Requirement 10: Decommissioning

5.8.29 10(1) In the event that, at some future date, the authorised development, or part of it, is to be decommissioned, a written scheme of decommissioning must be submitted to the relevant planning authority for its approval at least six months prior to decommissioning works.

5.8.30 10(2) The approved scheme must be implemented as approved as part of the decommissioning of the authorised development or relevant part of it.

5.8.31 10(3) This requirement does not apply to the part of the authorised development and associated development described in Schedule 1 (authorised development) which relates to the dismantling and removal of existing infrastructure or apparatus.

5.8.32 10(4) The written scheme of decommissioning submitted under sub-paragraph (1) must include environmental assessment undertaken in accordance with the laws and regulations applicable at the time it is submitted to the relevant planning authority.

Requirement 11: Approval and implementation of Surface Water Management Plan

5.8.33 11(1) Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may commence until, for that stage, a surface water management plan prepared substantially in accordance with the framework construction surface water management plan has been submitted to and approved by the relevant planning authority.

5.8.34 11(2) Each stage of the authorised development must be carried out in accordance with the approved surface water management plan referred to in sub-paragraph (1) or with any amended surface water management plan that may subsequently be approved by the relevant planning authority.

Requirement 12: Contamination of land or groundwater and controlled waters

5.8.35 12(1) If during any stage of the authorised development, contamination within the Order limits is identified as a result of the confirmatory ground investigations or unexpected contamination discovery procedures described in chapter 12, Geology and Hydrogeology, of the environmental statement and the code of construction practice, and this contamination is considered to present a significant possibility of significant harm to persons or pollution of controlled waters or the environment then, except in the case of emergency, no further development in the vicinity of the contamination may be carried out until a written scheme to identify the extent of the contamination and any mitigation or remedial measures to be taken to render the land fit for its intended purpose has been submitted to and approved by the relevant planning authority, following consultation with the Environment Agency.

5.8.36 12(2) Should mitigation or remedial measures be required then they must be carried out in accordance with the approved scheme referred to in sub-paragraph (1) and, if remedial measures are required, their implementation and validation documented in a verification report submitted to the planning authority.

5.8.37 12(3) In this requirement (contamination of land or groundwater and controlled waters), “controlled waters” has the same meaning as in Part 2A of the Environmental Protection Act 1990.”

Requirement 13: Biodiversity Net Gain

5.8.38 13(1) Prior to the commencement of the authorised development, the interim biodiversity net gain assessment must be submitted to each relevant planning authority.

5.8.39 13(2) Within six months of the date on which the construction period ends for the authorised development, a final biodiversity net gain assessment must be submitted to each relevant planning authority.

5.8.40 13(3) In the event that the final biodiversity net gain assessment demonstrates that less than 10% biodiversity net gain has been achieved overall across the Order land following construction of the authorised development, a biodiversity offsetting scheme, which must be substantially in accordance with the biodiversity net gain report, shall be submitted to each relevant planning authority.

5.8.41 13(4) Within 18 months of the date on which the construction period ends for the authorised development, the undertaker must secure the delivery of any identified onsite shortfall across the Order land in accordance with the biodiversity offsetting scheme by the undertaker acquiring biodiversity units.

5.8.42 13(5) Within two months of completion of the biodiversity offsetting scheme, the undertaker must submit a report confirming completion to the relevant planning authority.

Requirement 14: Access Options

5.8.43 14(1) Prior to commencement of the relevant part of the authorised development the undertaker must provide written notification to the relevant planning authority of its preferred option for each of the access points as set out in sub-paragraph (2) below which are to be constructed as part of the authorised development.

5.8.44 14(2) The options referred to in sub-paragraph (1) are:

- (a) Two alternative options for temporary construction access between Pennyhill Cottages Primary Access Route (PAR 34) and proposed pylon 4AF82 and satellite construction compound S-3:
  - (i) Option 1: Bellmouths BM-040 and BM-041 as shown on the temporary construction works figure, associated construction access track and watercourse crossings C-169 and BC-11 as shown on the indicative bridge and culvert watercourse crossing figure; or
  - (ii) Option 2: Bellmouths BM-040A and BM-41A off Pennyhill Cottages (PAR 34) as shown on the temporary construction works figure, associated construction access tracks and watercourse crossings C-220A, C-169A and BC-11A as shown on the indicative bridge and culvert watercourse crossing figure.
- (b) Two alternative options for temporary construction access tracks to proposed pylon 4AF88:
  - (i) Option 3: Watercourse crossing BC-36 and BC-37 as shown on the indicative bridge and culvert watercourse crossing figure; or
  - (ii) Option 4: Watercourse crossing B-06A as shown on the indicative bridge and culvert watercourse crossing figure.
- (c) Two alternative options for the construction access track between proposed pylons 4AF130 and 4AF131:
  - (i) Option 5: Watercourse crossing BC-29 as shown on the indicative bridge and culvert watercourse crossing figure; or
  - (ii) Option 6: Watercourse crossings BC-26A and BC-29B as shown on the indicative bridge and culvert watercourse crossing figure.
- (d) Two alternative options for taking access off High Melwood (PAR 63) and the associated construction access track:
  - (i) Option 7: Bellmouth BM-078 as shown on the temporary construction works figure; or
  - (ii) Option 8: Bellmouth BM-110 as shown on the temporary construction works figure.

- (e) Two alternative options for power supply connection points to the proposed main construction compound M-1:
  - (i) Option 9: Connection point NPG-09A as shown on the third party works figure; or
  - (ii) Option 10: Connection point NPG-09B as shown on the third party works figure.

5.8.45 14(3) Subject to sub-paragraph (4), the undertaker must only construct the relevant options notified under sub-paragraph (1)

5.8.46 14(4) The undertaker must not change from a notified option to an alternative option after the notification has been made under sub-paragraph (1). unless the undertaker has first provided written notice of that change to the relevant planning authority and provided that the undertaker has not yet commenced the option originally notified under sub-paragraph (1).

5.9 Planning Obligations

5.9.1 The Project does not include any planning obligations or unilateral undertakings.

5.9.2 As committed to in **Application Document 7.3 Register of Environmental Actions and Commitments**, the Project is committed to adopting a sustainable approach to development by proactively exploring measures to ensure that the Project leaves the environment in a better condition than it was before development (including but not limited to delivering 10% BNG with potential for environmental and societal benefits). The Project will seek to provide strategic habitat enhancement and creation, aiming to identify and implement opportunities to improve habitat quality and connectivity and align with national nature recovery objectives and projects. Such measures may include specific habitat creation and enhancement measures and additional receptor-specific measures such as the creation of habitat piles and installation of bird and bat boxes.

6. Planning Appraisal

6.1 Introduction

6.1.1 This section presents an appraisal of the Project's compliance with the key policies that are relevant to the Project. This includes national planning policy in the Overarching NPS for Energy EN-1 (Department for Energy Security and Net Zero, 2025), NPS for Renewable Energy Infrastructure EN-3 (Department for Energy Security and Net Zero, 2025) and NPS for Electricity Networks EN-5 (Department for Energy Security and Net Zero, 2025).

6.1.2 This section also identifies the local planning and neighbourhood planning policies, along with other material considerations such as the NPPF (Ministry of Housing, Communities and Local Government, 2026) relevant to the Project. This section should be read in conjunction with **Application Document 5.6 Policy Compliance Document** which provides an analysis of the compliance of the Project with relevant policies.

6.1.3 This appraisal considers the construction, operation and maintenance aspects of the Project. Only those policies that are considered relevant to the Project are included in this section of the Planning Statement.

6.2 Good Design

National Planning Policy Context

NPS EN-1

6.2.1 Section 4.7 of NPS EN-1 sets out the principles for good design that are applicable to all energy infrastructure and highlights the importance and the benefits of achieving good design, particularly for the mitigation of adverse impacts of a project.

6.2.2 Paragraph 4.7.5 of NPS EN-1 encourages the use of design principles and the appointment of a design champion to guide the design development from conception to operation.

6.2.3 Paragraph 4.7.6 of NPS EN-1 acknowledges that whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting.

6.2.4 Paragraph 4.7.7 of NPS EN-1 expects applicants to provide details in their application of how the design process was conducted and how the design has evolved, while paragraph 4.7.8 advises them to take independent professional advice on the design aspects of a proposal.

6.2.5 For decision-making, paragraphs 4.7.10 and 4.7.11 of NPS EN-1 require the SoS to be satisfied that the proposed development is '*sustainable*' and '*as attractive, durable, and adaptable* […] *as they can be*', having taken into account functionality (including fitness for purpose and sustainability) and aesthetics (including its

contribution to the quality of the area in which it would be located), any potential amenity benefits, and visual impacts on the landscape or seascape as far as possible.

6.2.6 Paragraph 4.7.12 adds that 'the SoS should take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements that the design has to satisfy'.

NPS EN-5

6.2.7 Section 2.2 of NPS EN-5 considers factors influencing site selection and design for electricity networks infrastructure. Paragraph 2.2.9 goes on to state that the applicant should '*consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts*'.

6.2.8 Paragraphs 2.2.10- 2.2.12 set out the duties of applicants under section 9 and Schedule 9 of the Electricity Act 1989, *'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 […]'*.

6.2.9 Section 2.4 of NPS EN-5 refers applicants to the criteria for good design set out in Section 4.7 of NPS EN-1. However, paragraph 2.4.3 requires the SoS to be mindful that electricity networks infrastructure must in the first instance be safe and secure, and that an applicant's ability to influence the aesthetic appearance of infrastructure may be limited by the functional design constraints of safety and security.

6.2.10 The Holford Rules (guidelines for the routeing of new overhead lines) are introduced in paragraphs 2.9.16 and 2.9.17 of NPS EN-5. Paragraph 2.11.2 of NPS EN-5 states '*The Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with the Holford* […] *Rules* […] *or any updates to them*'.

6.2.11 NPS EN-5 specifically covers undergrounding and subsea cables in paragraphs 2.9.20- 2.9.25. Notably, paragraph 2.9.21 states*: '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 National Landscape).'*

NPPF and NPPG

6.2.12 Section 14 of the NPPF (Ministry of Housing, 2026) is titled '*Achieving well-designed places'* and provides policy and guidance for the creation of 'high quality, healthy, inclusive and sustainable places'. NPPG also provides guidance on key points to take into account on design. Given that these policies and guidance emphasise the need for design quality throughout the evolution and assessment of individual proposals, similarly to those set out in NPS EN-1 above, they are not repeated here.

Local Planning Policy

East Riding of Yorkshire Council planning policy

6.2.13 ERYC Local Plan Update Policy ENV1: Integrating high quality design, requires development to contribute to safeguarding and respecting the character and

appearance of an area, and to seek to minimise demand for energy and maximise the use of decentralised and renewable or low carbon technologies. It also supports development where it achieves a high quality of design '*which optimises the potential of the site and contributes to a sense of place and beauty'*. This includes a list of requirements such as having regard to amenity and healthy lifestyles, taking account of local characteristics and land uses, incorporating hard and soft landscaping, integrating green infrastructure, incorporating BNG and considering the appropriate use of materials.

North Lincolnshire Council planning policy

6.2.14 NLCS Policy CS5: Delivering Quality Design in North Lincolnshire requires all new development in North Lincolnshire to be well designed and appropriate for their context and states that '*design which is inappropriate to the local area or fails to maximise opportunities for improving the character and quality of the area will not be acceptable*'. This policy also includes a list of requirements akin to those above.

Bassetlaw District Council planning policy

6.2.15 BLL Policy ST33: Design Quality seeks that development must be of a high quality design, that 'has a clear function, character and identity based upon a robust understanding of local context, constraints and distinctiveness' and 'uses land efficiently and ensures density reflects local character' along with a number of requirements similar to those above.

Neighbourhood Planning policies

6.2.16 The following Neighbourhood Plans and policies are relevant to the Project in terms of design:

- Policy GP2: Design Quality, of the Cottingham Neighbourhood Plan (2018);
- Policy 2: Local Design Principles, of the Headon, Upton, Grove and Stokeham Neighbourhood Plan (2018);
- Policy 5: Development Principles, of the Rampton and Woodbeck Neighbourhood Plan (2021);
- Policy 6: Local Design Code, of the Treswell with Cottam Neighbourhood Plan (2024);
- Policy 5R Achieving High-Quality Design, of the Misterton Neighbourhood Plan (2024);
- Policy 3: The Importance of Energy Efficiency and High Quality Design, of the Walkeringham Neighbourhood Plan (2021);
- Policy 5: Design principles, of the Sturton Ward Neighbourhood Plan; and
- Policy 6: Achieving Well Designed Places, of the East Drayton Neighbourhood Plan (2026).

Relevant Guidance

6.2.17 The Planning Inspectorate's NSIP Advice Page on Good Design (Planning Inspectorate, 2024) emphasises the importance of good design for achieving sustainable, inclusive, and well-designed infrastructure projects. It encourages

applicants to follow the advice provided on design considerations, ensuring a holistic approach throughout the project's development. Key factors include addressing design challenges, engaging with communities, maintaining a strong design vision, and ensuring the design evolves through professional review and consultation. The advice also stresses the importance of securing design quality beyond the site and throughout the delivery process. Annex A of the document provides a list of good design issues for applicants to consider.

6.2.18 The Planning Inspectorate's NSIP Advice Page on Preparing Applications for Linear Projects (Planning Inspectorate, 2025) provides advice on electric lines, gas pipelines, water resource transfers, and onshore transmission works for offshore wind stations. The advice encourages early engagement with the Planning Inspectorate and other parties during the pre-application process on optioneering. The note directs applicants to the Advice Page on Good Design (Planning Inspectorate, 2024) and highlights that for '*linear projects it is important that the narrative covers the construction stage as well as operation because of the potential to affect various communities and habitats along the route*'. It also goes on to advise that flexibility for linear projects can be required.

Appraisal

Overview

6.2.19 The location and design of the Project is the result of a comprehensive site selection process that was led by the consideration of good design and key environmental and planning constraints to avoid and minimise impacts as early as possible. The site selection and design process is documented in detail in accordance with paragraph 4.7.7 of NPS EN-1 (Department for Energy Security and Net Zero, 2025), in the following reports:

- **Application Document 7.17 Strategic Options Report Including Needs Case**: this report sets out why the proposed Project is needed and what strategic options were considered to meet the identified need case.
- **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** and **Application Document 7.19 Supplementary Corridor and Routeing Report**: these reports explain how the routeing and siting of the proposed Project was undertaken (following the selection of the strategic option) and the reasons for the selection of the emerging preferences which were consulted upon during two non-statutory pre-application consultations.
- **Application Document 7.20 Design Development Report - 2025**: this report sets out the defined proposal developed following the non-statutory pre-application consultations, which was put forward to statutory consultation (18 February to 15 April 2025).
- **Application Document 5.9 Design Development Report**: this report summarises the design development and sets out how the design of the Project evolved from statutory consultation to the Project as applied for, taking into account feedback received from stakeholders.
- **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered**: this Environmental Statement (ES) chapter provides

an overview of the main alternatives considered at each stage of the design development (from strategic options to the proposal as applied for).

Design approach

6.2.20 **Application Document 5.10 Design Approach Document** provides details of the design approach taken by the Project. As required by the Advice on Good Design (Planning Inspectorate, 2024) and paragraph 4.7.5 of NPS EN-1 (Department for Energy Security and Net Zero, 2025), a Design Champion has been appointed to ensure that good design is embedded within the Project development. The Project Director has been the nominated Design Champion as they have overall accountability for the delivery of the Project, and therefore, for the design process.

6.2.21 In accordance with paragraph 4.7.5 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) and NPS EN-5 (Department for Energy Security and Net Zero, 2025), the use of design principles has guided the development of the Project. These principles reflect the acknowledgement in the NPSs that good design for electricity transmission infrastructure is achieved through infrastructure that is safe, secure and resilient, and which responds appropriately to its environmental and community context, and is not defined solely by visual appearance. The principles considered include the Holford Rules, undergrounding policy, local planning policy, NIC Design Principles (NIC Design Group, 2020), Planning Inspectorate's Advice on Good Design and on Linear Projects (Planning Inspectorate, 2024), technical design requirements set out in legislation and policy and other relevant legislation and policies.

6.2.22 **Application Document 5.10 Design Approach Document** explains that a multi-disciplinary team has been established from the Strategic Proposal stage of the Project, including individuals with expertise across engineering, environmental and socio-economic disciplines, as well as stakeholder engagement, land and project management specialists. This team has functioned as a design panel through the design process by working in a collaborative manner to develop and appraise strategic and routeing and siting options, and for this reason, a separate, independent design panel has not been engaged during the development of this Project.

6.2.23 Furthermore, this Project comprises the provision of works that are typical of National Grid infrastructure with minimum functional requirements and a very limited scope for any design deviations. Given this, an independent design panel was not considered to be necessary and was not engaged during the development of this Project.

Design evolution

6.2.24 Once the need for the Project had been established, as set out in **Application Document 7.17 Strategic Options Report Including Needs Case** and section 3 of this Planning Statement, National Grid considered the different ways this need could be met to generate a preferred strategic option. Four options were considered at this stage with different geographical connection points. For each option, the technology options available for transmission system reinforcement, environmental and socio-economic constraints, lifetime costs of each technology option, as well as initial capital costs, were considered. The strategic options considered and the reasons for the selection of the preferred option are set out in **Application Document 7.17 Strategic Options Report Including Needs Case**.

6.2.25 Following the selection of the strategic option, the development and refinement of preliminary corridor options was undertaken to identify and appraise corridors and preliminary routeing and siting options for the Project. This appraisal considered the potential effects on the environment, the local community, relevant spatial planning policy and planning applications, other existing and proposed developments as well as technical and engineering design considerations. The four preliminary corridors were divided in sections, links and loops for appraisal and the identification of an emerging preferred corridor. Following the appraisal of the sections, links and loops in isolation, an end-to end solution review was then undertaken between Creyke Beck and High Marnham. This review considered each progressed section, link or loop of the preliminary corridor in the context of the wider end-to-end solution and ensured that the reasoning and justification for progressing one part of the emerging preferred corridor did not incorrectly impact on the decision made for the next section, link or loop of the corridor. The wider end-to-end solution review also incorporated cost performance.

6.2.26 This approach was used to identify the preferred corridor for a new overhead line which is considered to offer the optimum balance between environmental, technical, cost and socio-economic considerations. This preferred corridor was put forward for non-statutory pre-application consultation (1 June 2023 – 27 July 2023). The option selection process, the options considered and the preferred corridor are described in **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study**.

6.2.27 Consideration of feedback received from the non-statutory pre-application consultation conducted between 1 June 2023 to 27 July 2023 and a subsequent review of the Corridor and Preliminary Routeing and Siting Study (CPRSS) 2023, led to the identification of a potential alternative corridor between South Wheatley and High Marnham, now referred to as the eastern corridor. **Application Document 7.19 Supplementary Corridor and Routeing Report** was prepared to support a localised non-statutory pre-application consultation in 2024 on the eastern corridor for stakeholders to review and provide feedback prior to a decision being made on the overall preferred corridor and the identification of a route alignment and subsequent statutory consultation.

6.2.28 The Project was then developed taking into account feedback received at the 2023 and 2024 non-statutory pre-application consultations, stakeholder engagement and environment, socio-economic and technical studies. **Application Document 7.20 Design Development Report - 2025** was produced, and the defined proposal was put forward to statutory consultation (18 February to 15 April 2025).

6.2.29 Following statutory consultation undertaken between February and April 2025, the Project design was further refined in response to consultation feedback, alongside the results of environmental, socio-economic, transport and engineering studies. This stage of design development focused on reviewing the preferred alignment and proposals presented at statutory consultation, identifying potential modifications, and assessing where changes were proposed.

6.2.30 The outcome of this stage of design development is documented in **Application Document 5.9 Design Development Report**. The purpose of the report is to describe how the Project has evolved since statutory consultation, including how feedback, additional surveys and assessments, and further design review have informed the refinement of the final proposals submitted for development consent, in line with paragraph 4.7.7 of NPS EN-1.

Policy influences on design

6.2.31 Each of the options identified for the Project has been appraised in accordance with National Grid Approach to Consenting (National Grid, 2022) and is underpinned by principles that are aligned with National Grid's statutory duties under sections 9 and 38 of the Electricity Act 1989, as follows:

- Section 9 (General duties of licence holders) of the Electricity Act 1989 states that:

'It shall be the duty of the holder of a licence authorising him to participate in the transmission of electricity:

*(a) to develop and maintain an efficient, co-ordinated and economical syst*em of electricity transmission […]';

- Schedule 9 (preservation of amenity), includes consideration of impacts upon communities, landscape, visual amenity, cultural heritage, and ecological resources; and
- Section 38 and Schedule 9 which state that:

'(1) In formulating any relevant proposals, a licence holder or a person authorised by exemption to generate, distribute, supply or participate in the transmission of electricity:

(a) shall 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

(b) shall do what he 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.'

6.2.32 When making judgements and decisions about the Project, the options appraisal process has also considered planning policy and guidance including the British Energy Security Strategy (2022), NPSs and NPPF. The topics and associated criteria considered in the appraisal of options are outlined in sections 6, 7, 8 and 9 of **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** and included:

- Landscape and Visual: potential to affect the special qualities and landscape character of National Landscapes and proximity to sensitive visual receptors (residential/settlement);
- Ecology: proximity to designated sites of European/international/national/local value, proximity to ancient woodland;
- Flood Risk and Water Environment: proximity to Flood Zones 2 and 3 and to main rivers;
- Historic Environment: proximity to World Heritage Sites, conservation areas, scheduled monuments, listed buildings, Registered Parks and Gardens and Registered Battlefields and military remains;
- Settlement and Population: proximity to main settlements and to allocations and growth areas;

- Tourism and Recreation: number of public rights of way (PRoWs)/National Trails/National Cycle Routes crossings/diversions and proximity to tourist attractions; and
- Planning: current planning applications, conformance with NPS EN-1, and NPS EN-5, NPPF and NPPG and local development plan spatial policies.

6.2.33 In addition to National Grid's statutory obligations and all other relevant planning policies and guidance, the Project design has been informed by the Holford Rules (National Grid, 1959) to inform the design and routeing of the proposed overhead line. A detailed overview of how the Holford Rules were applied in the routeing and siting of the proposed Project is available in section 6.4 of **Application Document 5.9 Design Development Report**.

6.2.34 National Grid has also considered recent advice from the Planning Inspectorate on linear projects (Planning Inspectorate, 2025). This guidance recommends '*a clearly structured approach, setting out criteria for selection and how the preferred route was determined'*. **Application Document 7.17 Strategic Options Report Including Needs Case**, **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study**, **Application Document 7.19 Supplementary Corridor and Routeing Report**, and **Application Document 7.20 Design Development Report - 2025** demonstrate that such a structured approach, following a methodology based on clearly-defined criteria, has been adopted in the routeing and optioneering process. A summary of this process is provided in **Application Document 5.9 Design Development Report** and an overview of the corridors and alignments considered is also available in **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered**, in line with the Planning Inspectorate advice on linear projects.

6.2.35 **Application Document 5.9 Design Development Report** also explains where design choices have sought to reduce the environmental effects of the Project and demonstrates that the design has incorporated embedded mitigation to avoid or reduce significant environmental effects where practicable. **Application Document 7.3 Register of Environmental Actions and Commitments** details the embedded measures and additional mitigation measures that have been identified through the Environmental Impact Assessment (EIA) to avoid or reduce likely significant environmental effects.

6.2.36 In line with the principles of NPS EN-5 in relation to undergrounding, National Grid has considered the benefits of undergrounding cables as summarised in **Application Document 5.9 Design Development Report**. At an early stage of design development, a preliminary assumption was made to underground a section of the existing 400 kV ZDA overhead line between Ealand and west of Keadby to facilitate the crossing of the proposed new overhead line. As set out in **Application Document 7.20 Design Development Report - 2025**, a detailed appraisal of alternative crossing solutions was subsequently undertaken, including both underground and overhead options, having regard to the technical feasibility, environmental and socio-economic effects, cost, and programme considerations. This process identified an overhead 'diamond duck under' crossing as the preferred solution, as it utilises and modifies existing infrastructure, reduces land-take and construction complexity. It also avoids the greater environmental effects, carbon intensity and costs associated with undergrounding high-voltage transmission circuits. This approach was considered to represent the most appropriate and proportionate solution, and undergrounding was not taken forward in this location.

Through the design process, it was concluded that overhead line infrastructure represented the most efficient and appropriate solution for the entire route, in accordance with NPS EN-5 and National Grid's statutory duties.

Coordination in design development

6.2.37 The design of the proposed Project has responded to policy expectations set out in NPS EN-1 (Department for Energy Security and Net Zero, 2025) requiring the consideration of coordination for onshore electricity transmission infrastructure to minimise adverse impacts to the local environment and host communities.

6.2.38 As set out in **Application Document 5.11 Interrelationship Document**, at the routeing and siting stage, consideration was given to geographically and temporally proximate projects where relevant, in order to identify potential opportunities to reduce environmental and community effects through coordination. A key consideration has been the extent to which coordination could be achieved through alignment with existing infrastructure corridors, including existing overhead line routes, and whether this could assist in minimising additional land-take or disturbance.

6.2.39 In practice, opportunities for co-location of infrastructure have been limited. However, the presence of existing linear overhead line infrastructure has been an important factor in informing routeing decisions and reducing the need for entirely new corridors where practicable. Notwithstanding the limited scope for co-location, consideration has been given to other forms of coordination between projects. This includes opportunities for shared or aligned use of temporary access arrangements where feasible, alignment of construction programmes where practicable and the potential to coordinate environmental mitigation measures in a manner that avoids unnecessary duplication and reduces cumulative effects.

6.2.40 Early discussions with local planning authorities (LPAs) prior to non-statutory pre-application consultation, supported by consultation feedback, identified that there may be benefits in coordinating construction activities between overlapping or proximate projects. This has informed ongoing engagement with other project promoters in relation to programme alignment, interface management and cumulative effects.

6.2.41 **Application Document 5.11 Interrelationship Document** provides details of the approach to coordination between projects undertaken by the Project.

Sustainability and good design

6.2.42 In accordance with paragraph 4.7.10 to 4.7.11 of NPS EN-1 (Department for Energy Security and Net Zero, 2025), sustainability has been embedded throughout the evolution of the Project and has informed decision-making from the earliest stages of the design process. The Project has been developed through an iterative and multidisciplinary approach, and throughout the design process, sustainability considerations have been balanced alongside engineering, environmental, socio-economic and cost considerations.

6.2.43 The preparation of the ES as part of the process of EIA required by The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 has been an integral part of the National Grid design process which supports the achievement of good design outcomes.

6.2.44 Engineering, environmental, planning, construction and land specialists have worked collaboratively to identify opportunities to improve environmental performance, reduce construction impacts and enhance the long-term resilience and operation of the proposed infrastructure. This has included taking account of engagement and consultation with a wide range of stakeholders, including landowners, statutory and non-statutory consultees, local communities and their elected representatives, and specialist interest groups.

6.2.45 The outcomes of the good design process undertaken has included avoiding or reducing impacts on environmentally sensitive receptors through routeing and siting, and making efficient use of land by maximising close parallel routeing with existing electricity transmission infrastructure where reasonably practicable. Construction impacts have been reduced through the refinement of access arrangements, working areas and construction methodologies. Whole-life operational performance maintenance requirements and asset resilience have also informed design decisions. Embedded environmental mitigation has been incorporated into the design wherever reasonably practicable, as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**.

6.2.46 To allow for a proportionate degree of flexibility, Limits of Deviation (LoD) have been developed for the Project, which are set out in **Application Document 3.1 Draft Development Consent Order**. The LoDs define the maximum extent within which Project components may be located and provide a clear and controlled framework for detailed design development. The LoDs operate within the Order Limits, which define the maximum extent of the authorised development. Within the horizontal and vertical LoDs, micro-siting has been undertaken to enable the detained positioning of pylons and, where relevant, access routes to avoid or reduce impacts on sensitive features, such as habitats, woodlands and trees. Micro-siting for the Project has considered engineering and safety requirements, and the swing of conductors, ensuring that flexibility is used as a tool to minimise environmental effects while maintaining operational standards.

6.2.47 Further technical detail on the application of LoD, pylon siting and micro-siting is provided in **Application Document 7.20 Design Development Report - 2025** and **Application Document 5.9 Design Development Report**.

6.2.48 The Project has also been developed having regard to the principles of PAS 2080:2023: Carbon management in buildings and infrastructure (British Standards Institution, 2023), which promotes the management and reduction of whole-life carbon across the lifecycle of infrastructure assets. Consistent with the PAS 2080 hierarchy, opportunities to reduce carbon have been considered through strategic option selection, routeing, engineering design and construction planning. This has included seeking to avoid unnecessary infrastructure, minimise material use where reasonably practicable, reduce construction activities and promote efficient design solutions that support long-term operational performance.

6.2.49 Sustainability and good design will continue to inform the Project during detailed design and delivery. Further refinement of construction methods, temporary works, access arrangements and environmental mitigation will be undertaken within the parameters secured through the DCO.

6.2.50 In summary, the Project delivers good design that is sustainable, in accordance with the design policies set out in the NPSs which acknowledge that any design decisions must reflect the need to efficiently deliver large-scale energy infrastructure, and therefore (as recognised in national policy), the extent to which a scheme can

contribute to the enhancement of the quality of the area is limited. Through the design process presented in the suite of design documents submitted with the application, the Project will deliver high quality design which has responded to the local and surrounding context in accordance with relevant local planning policies.

6.3 Landscape and Visual

National Planning Policy Context

NPS EN-1

6.3.1 Section 5.10 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out policies for landscape and visual impacts relating to NSIPs. Paragraph 5.10.1 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) acknowledges that the landscape and visual effects of energy projects will vary on a case-by-case basis depending on the type of development, its location and landscape setting.

6.3.2 Paragraph 5.10.5 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) acknowledges that '*Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation*'.

6.3.3 Paragraph 5.10.6 states '*Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate*'.

6.3.4 Paragraph 5.10.12 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) recognises local landscapes that may be highly valued and sets out that where a local development document in England has policies based on landscape or waterscape character assessments, these should be taken into account. However, it is stated that '*locally valued landscapes should not be used in themselves to refuse consent, as this may unduly restrict acceptable development*'.

6.3.5 In terms of visual impacts, paragraph 5.10.13 recognises that all proposed energy infrastructure is likely to have visual effects for many receptors. Paragraph 5.10.14 sets out that the SoS will have to judge whether the visual effects of development on sensitive receptors would outweigh the benefits.

6.3.6 Paragraph 5.10.16 advises that applicants should '*carry out a landscape and visual impact assessment and report it in the ES, including cumulative effects*'.

6.3.7 Paragraph 5.10.19 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out that the '*applicant should consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established. This will allow the applicant to demonstrate in the ES how negative effects have been minimised and opportunities for creating positive benefits or enhancement have been recognised and incorporated into the design, delivery and operation of the scheme*'.

6.3.8 Paragraph 5.10.24 also sets out that applicants should consider how landscapes can be enhanced using landscape management plans.

6.3.9 With regard to mitigation measures, paragraph 5.10.27 identifies that '*Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within its development site and wider setting*'.

6.3.10 Paragraph 5.10.28 adds that '*depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site. For example, filling in gaps in existing tree and hedge lines may mitigate the impact when viewed from a more distant vista*'.

6.3.11 NPS EN-1 (Department for Energy Security and Net Zero, 2025) paragraph 5.10.35 states 'The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project'.

6.3.12 When reaching a judgement, paragraph 5.10.36 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states '*the Secretary of State should consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the Secretary of State considers reasonable*'.

6.3.13 Paragraph 5.10.37 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) identifies that '*The Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints to minimise harm to the landscape, including by appropriate mitigation*'.

NPS EN-5

6.3.14 NPS EN-5 (Department for Energy Security and Net Zero, 2025) outlines in paragraphs 2.9.7 and 2.9.8 that '*in practice new overhead lines can give rise to adverse landscape and visual impacts*' and that the impacts '*depend on the type* […] *scale, siting and degree of screening of the lines, as well as the characteristics of the landscape and local environment through which they are routed'*.

6.3.15 Paragraph 2.9.11 of NPS EN-5 (Department for Energy Security and Net Zero, 2025) states '*landscape and visual benefits may arise through the reconfiguration, rationalisation, or undergrounding of existing electricity network infrastructure. Though mitigation of the landscape and visual impacts arising from overhead lines and their associated infrastructure is usually possible, it may not always be so, and the impossibility of full mitigation in these cases does not counter the need for overhead lines*'.

6.3.16 Paragraph 2.9.14 of NPS EN-5 (Department for Energy Security and Net Zero, 2025) sets out 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 seascape, landscape and visual impact assessment (SLVIA), the applicant should demonstrate that they have given due consideration to the costs and benefits of feasible alternatives to the overhead line*'.

6.3.17 Paragraph 2.9.15 outlines that the ES should set out details of the applicant's consideration of alternatives to the overhead line and the mitigation cost calculation methodology that this rationale relies on.

6.3.18 Paragraphs 2.9.16 and 2.9.17 provide the Holford Rules (National Grid, 1959) which provides the guidelines for the routeing of new overhead lines. The Holford Rules

(National Grid, 1959) comprise seven key rules which have been applied during the design and siting for the Project.

6.3.19 Paragraph 2.9.21 considers undergrounding and subsea cables and states that it is the government's position that overhead lines be the strong starting presumption for electricity networks developments in general but that the presumption is reversed when development passes through nationally designated landscapes.

6.3.20 Section 2.11 of NPS EN-5 (Department for Energy Security and Net Zero, 2025) provides policy in respect of the SoS decision making. Paragraph 2.11.2 of requires the SoS to be satisfied that the Project complies with the Holford Rules (guidelines for the routeing of new overhead lines), while paragraph 2.11.6 states '*in locations where there is a high potential for widespread and significant adverse landscape and/or visual impacts, the Secretary of State should be satisfied that the applicant has provided evidence to support a decision on whether undergrounding is or is not appropriate* […]'.

NPPF and PPG

6.3.21 The overarching objectives set out in Policy DP3 (Chapter 14: Achieving well-designed places) and Policy N2 (Chapter 19: Conserving and enhancing the natural environment) in the NPPF (Ministry of Housing, Communities and Local Government, 2026) and PPG 'Natural environment' (Ministry of Housing, Communities and Local Government, 2025) contain similar landscape considerations as the NPSs to protect and enhance the natural and local environment including valued landscapes, and are therefore not repeated here.

Local Planning Policy Context

East Riding of Yorkshire Council planning policy

6.3.22 Policy ENV1 (Integrating High Quality Design) of the East Yorkshire Local Plan Update (ERYLP) (East Riding of Yorkshire Council, 2025) requires developers to have regard to the diverse landscape during the design process.

6.3.23 Policy ENV2 (Promoting a high quality landscape) sets out that proposals for development should be sensitively integrated into the existing landscape, protecting and enhancing the landscape character as described in the East Riding Landscape Character Assessment.

6.3.24 Policy EC5 (Supporting the renewable and low carbon energy sector) of the ERYLP (East Riding of Yorkshire Council, 2025) sets out that development will be supported where any significant adverse impacts are addressed satisfactorily, and the residual harm is outweighed by the wider benefits of the proposal. Development should be acceptable in terms of visual impacts and the character and sensitivity of the landscape to accommodate energy development.

North Lincolnshire Council planning policy

6.3.25 Policy CS16 (North Lincolnshire's Landscape, Greenspace and Waterscape) of the North Lincolnshire Core Strategy (NLCS) (North Lincolnshire Council, 2011) seeks to protect, enhance and support a diverse and multi-functional network of landscape. Development on or adjacent to locally important landscapes will not be permitted

where it would result in unacceptable conflict with the function(s) or characteristic of that area.

6.3.26 Policy LC7 (Landscape Protection) of the North Lincolnshire Local Plan (NLLP) (North Lincolnshire Council, 2003) requires development within the countryside to give special attention to the scenic quality and distinctive local character of the landscape.

6.3.27 Policy LC10 (Development in Areas of High Landscape Value) permits development in Areas of High Landscape Value where it is sensitively related to the distinctive local character of landscape.

6.3.28 Policy LC11 (Areas of Amenity Importance) of the NLLP (North Lincolnshire Council, 2003) only permits development in important amenity areas where it would not adversely affect their open character and visual amenity.

6.3.29 Policy LC14 (Area of Special Historic Landscape Interest) of the NLLP (North Lincolnshire Council, 2003) designates the Isle of Axholme as an area of Special Historic Landscape Interest, where development will not be permitted if it would destroy, damage or adversely affect the character, appearance or setting of the historic landscape, or any of its features.

Bassetlaw District Council planning policy

6.3.30 Policy ST35 (Landscape Character) of the Bassetlaw Local Plan (BLP) (Bassetlaw Local Plan, 2024) requires developments to demonstrate that they protect and enhance the distinctive qualities of the landscape character policy zone as identified in the Bassetlaw Landscape Character Assessment 2009 by conserving, restoring, reinforcing or creating relevant landscape forms and features.

6.3.31 Policy ST49 (Renewable Energy Generation) of the BLP (Bassetlaw Local Plan, 2024) supports renewable energy development subject to the satisfactory resolution of relevant site specific and cumulative impacts including on location, setting and position in the wider landscape.

Neighbourhood planning policy

6.3.32 The following Neighbourhood Plans and policies are relevant to the Project in terms of landscape and visual:

- East Drayton Neighbourhood Plan (Made 2026) (East Drayton Neighbourhood Planning Group, 2026) Policy 2: Protecting the Landscape Character;
- HUGS Neighbourhood Plan (Made 2018) (Nether Headon, Upton, Grove and Stokeham Parish, 2018) Policy 2: Local Design Principles and Policy 3: Landscape Character;
- Sturton Ward Neighbourhood Plan (Made 2021) (Sturton Ward Planning Group, 2021) Policy 2a: Protecting the landscape character, significant green gaps and key views;
- Rampton and Woodbeck Neighbourhood Plan (Made 2021) (Bassetlaw District Council, 2021) Policy 5: Development Principles and Policy 10: The Protection of the Parish Landscape; and
- Walkeringham Neighbourhood Plan (Made 2021) (Walkeringham Neighbourhood Plan Steering Group, 2021) Policy 2R: Improving Green and Blue Infrastructure

and Biodiversity and Policy 3R: Protecting and Enhancing the Landscape Character.

Assessment Conclusions

Overview

6.3.33 **Application Document 6.6 Environmental Statement Chapter 6 Landscape** provides an assessment of likely effects of the Project on landscape components and character, including key characteristics during construction and operation of the Project. **Application Document 6.7 Environmental Statement Chapter 7 Visual** provides an assessment of likely effects of the Project on visual amenity and impacts in relation to communities and recreational facilities in the vicinity of the Project.

6.3.34 Landscape and visual matters were considered in the early stages of siting and design of the Project and embedded measures have been intrinsic to the design of the Project to reduce and where possible avoid landscape and visual effects. **Application Document 5.9 Design Development Report**, **Application Document 7.17 Strategic Options Report Including Needs Case**, **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study**, and **Application Document 7.19 Supplementary Corridor and Routeing Report** provide an overview of the design rationale for the Project. They demonstrate how the Project has avoided or reduced environmental effects, including landscape and visual effects, wherever practicable, from the initial option identification and selection stage up to the refinement of the Project in response to feedback, further assessments and design work. Embedded measures include:

- Where possible, the Project has been designed to be parallel or close parallel with the existing overhead lines to reduce the spread of effects from overhead lines in the landscape as well as other environmental constraints. Route Sections where close parallel routeing has been possible, include Route Section A which minimises the effects on the Yorkshire Wolds Important Landscape Area, Route Section B between the River Ouse and Luddington, and Route Section D to the south of Beltoft which minimises the effects on the Isle of Axholme Area of Special Historic Landscape Interest.
- Where possible and where the Project is not close parallel with the existing overhead lines, the Project has been designed to avoid existing vegetation. Examples include routeing between the larger woodland blocks either side of the M180 in Route Section D and using existing field entrances for access to avoid unnecessary removal of mature hedgerows and trees throughout the length of the Project.

6.3.35 Additional mitigation measures have also been identified to further reduce significant effects on landscape and visual receptors, and include additional scrub, tree, hedgerow and woodland planting to mitigate losses and increase connectivity as set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** which is secured by **Application Document 3.1 Draft Development Consent Order**.

6.3.36 Control and management measures to mitigate the impacts of construction on the landscape and visual receptors will be carried out in accordance with **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.

Landscape

6.3.37 **Application Document 6.6 Environmental Statement Chapter 6 Landscape** concludes that, following the implementation of the proposed embedded and additional mitigation, there would not be any significant adverse effects on any designated landscapes, which includes the Yorkshire Wolds Important Landscape Area. Although the Yorkshire Wolds Important Landscape Area is not currently designated as a national landscape, on 4 February 2026 Natural England issued notice of intention to 'make' the designation Order for the proposed Yorkshire Wolds Area of Outstanding Natural Beauty (AONB) (currently Yorkshire Wolds Important Landscape Area). The Draft Yorkshire Wolds AONB (Designation) Order 2026 (Natural England, 2026) identifies the areas to be designated. At its closest, near Market Weighton, the area proposed for designation is approximately 11.4 km from the Limits of Deviation. At this distance, the special qualities and statutory purposes of the AONB would not be significantly affected by the Project and no further assessment has been undertaken.

6.3.38 Therefore, there would be no effects on any National Park, The Broads or National Landscape as a result of the Project.

6.3.39 During construction, significant adverse landscape effects are predicted for all of the Landscape Character Types (LCTs) and Regional Landscape Character Types (RLCTs) which would be directly affected by construction activity within the Order Limits of the Project. These are set out in detail in **Application Document 6.6 Environmental Statement Chapter 6 Landscape**. These effects would be limited to areas close to the construction activities, related to the introduction of construction activity and equipment, including the temporary loss of some landscape features including field boundary vegetation. Effects would be temporary and these areas would be reinstated in line with the commitments made in **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.8 Outline Landscape and Ecology Management Plan** where possible and will be secured by **Application Document 3.1 Draft Development Consent Order**.

6.3.40 During operation, at Year 1, major adverse (significant) landscape effects are limited to those areas where the proposed overhead line does not run parallel with existing overhead lines, affects a character area which does not already contain existing overhead lines or where vegetation removal which occurred during construction would continue to be noticeable. This includes LCT 12: Sloping Wooded Farmland, LCT 13: Open High Rolling Farmland, Trent Levels: Flat Drained Farmland LCT (in Route Section C) and RLCT 4a: Unwooded Vales.

6.3.41 At Operation Year 15, although landscape mitigation would be maturing, significant effects relating to the proposed overhead line would remain. Major adverse (significant) effects would continue for Trent Levels: Flat Drained Farmland LCT (in Route Section C) and RLCT 4a: Unwooded Vales (in Route section E and F).

Visual

6.3.42 During construction, significant adverse impacts are anticipated on a number of visual receptors including communities and recreational receptors; however, impacts relating to construction would be temporary, and mitigation measures set out in **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.2 Outline Code of Construction Practice** would ensure these impacts are managed.

6.3.43 **Application Document 6.7 Environmental Statement Chapter 7 Visual** concludes that the Project would result in significant adverse visual impacts at Operation Year 1 and Operation Year 15 at 19 out of the 44 communities that are located within the chosen study area for the Project, due to the presence of the proposed overhead lines. These communities are:

- Beckingham;
- Belton;
- Brantingham;
- Darlton;
- East Drayton;
- Ellerker;
- Fledborough;
- Gringley on the Hill;
- Misterton;
- North Leverton with Habblesthorpe;
- Ragnall;
- Rampton and Woodbeck;
- Rowley;
- South Leverton;
- Stokeham;
- Sturton le Steeple;
- Treswell;
- Twin Rivers; and
- Walkeringham.

6.3.44 The assessment also considers the visual impacts of the Project in relation to recreational receptors which include National Trails, long distance footpaths, other promoted routes, cycle routes, navigable watercourses and visitor attractions. It concludes the following at Operation Year 1 and Operation Year 15.

6.3.45 It concludes that, overall, there would be a minor adverse impact on the Yorkshire Wolds Way National Trail which is not significant, however, due to users having to pass beneath the proposed overhead line at Woo Dale, this would result in a significant adverse impact within 200 m of the Yorkshire Wolds National Trail.

6.3.46 There would also be a significant adverse impact within 300 m of the Trent Valley Way, within 200 m of the High Hunsley Circuit, within 300 m of the Peatlands Way, and the Cuckoo Way long distance footpaths at Operation Year 15. The Beverley 20 Footpath will also experience significant adverse impacts within 200 m of the footpath at Operation Year 15.

6.3.47 There would be no significant adverse impacts on any cycle route as a result of the Project.

6.3.48 Significant adverse impacts are expected within 200 m of Market Weighton Canal and Stainforth and Keadby Canal. Chesterfield Canal and North Leverton Windmill navigable watercourses will experience significant adverse impacts.

Appraisal

6.3.49 In accordance with paragraphs 5.10.16 to 5.10.24 of NPS EN-1, an assessment of landscape and visual impacts of the Project has been carried out. **Application Document 5.10 Design Approach Document**, **Application Document 5.9 Design Development Report**, **Application Document 7.17 Strategic Options Report Including Needs Case**, **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study**, and **Application Document 7.19 Supplementary Corridor and Routeing Report** demonstrate how landscape and visual considerations have been intrinsic to the design development of the Project, and how the Project design process was informed by the Holford Rules to avoid impacts where possible in accordance with paragraphs 2.9.16 and 2.9.17 of NPS EN-5.

6.3.50 As set out in **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**, embedded measures that are intrinsic to and built into the design of the Project have been incorporated from the outset to reduce and avoid landscape and visual impacts as far as practicable. Whilst the Project will result in some significant adverse impacts during construction and operation, much of the surrounding landscape is influenced by existing overhead line infrastructure. The Project has been designed to sit in parallel with this infrastructure to minimise the extent of the change, where possible. Therefore, the majority of the proposed overhead line would be seen in the context of existing overhead lines, thereby containing the spread of infrastructure.

6.3.51 **Application Document 6.6 Environmental Statement Chapter 6 Landscape** concludes that following the implementation of embedded and additional mitigation measures set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, and **Application Document 7.8 Outline Landscape and Ecology Management Plan**, which will be secured by **Application Document 3.1 Draft Development Consent Order**, the Project would result in significant landscape effects at Operation Year 15 on two landscape character types, Flat Drained Farmland LCT (in Route Section C) and RLCT 4a: Unwooded Vales (in Route Section E and F) as a result of the proposed overhead line. In addition, **Application Document 6.7 Environmental Statement Chapter 7 Visual** concludes that while there are significant visual impacts on communities and recreational facilities, these are localised to where the proposed overhead line would be located, and mainly within 200 m or 300 m of the relevant receptor.

6.3.52 There would be no effects on any National Park, The Broads or National Landscape as a result of the Project.

6.3.53 Some significant effects are also anticipated on some landscape character types, and visual effects on communities and recreational receptors during construction, however, these are temporary, and construction impacts would be minimised as far as practicable in line with the commitments set out in **Application Document 7.5 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, which will be secured by **Application Document 3.1 Draft Development Consent Order**.

6.3.54 The scale and impacts of energy projects on the landscape and visually is acknowledged in paragraph 5.10.35 of NPS EN-1 which indicates that '*the scale of energy projects means that they will often be visible across a very wide area*'. Paragraph 5.10.35 then states that '*the Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project*'. Overall, the substantial public benefits and need for the Project, as set out in section 3, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives and carbon reduction commitments, clearly and demonstrably outweigh the mostly localised adverse impacts to the landscape and visual amenity set out in **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**.

6.3.55 Following implementation of the mitigation measures proposed, the Project is in accordance with paragraphs 5.10.1 to 5.10.37 of NPS EN-1, paragraph 2.9.7 to 2.9.20, and 2.11.2 to 2.11.6 of NPS EN-5, the NPPF, PPG and relevant local policies relating to landscape and visual impacts.

6.4 Ecology and Biodiversity

6.4.1 This section has been split into four subsections to assist understanding of which policy is relevant for the various ecological and biodiversity matters which relate to the Project. The four subsections are:

- Habitats Regulations Assessment (HRA);
- Regional and local ecological sites, habitats and species;
- Irreplaceable Habitats; and
- BNG.

Habitats Regulations Assessment

National planning policy context

6.4.2 Paragraph 5.4.4 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) identifies that the highest level of biodiversity protection is afforded to sites which are internationally designated. EN-1 also references the Conservation of Habitats and Species Regulations 2017 (HM Government, 2017), which set out sites for which a HRA is required, including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).

6.4.3 Paragraph 5.4.5 of NPS EN-1 outlines that potential SPAs, SACs and listed and proposed Ramsar sites should be given the same level of protection as sites covered by the Conservation of Habitats and Species Regulations 2017 (HM Government, 2017) and that a HRA will be required. Paragraph 5.4.7 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) also recognises that many Sites of Special Scientific Interest (SSSIs) are designated as sites of international importance and features of SSSIs not identified in the citation should also be given a high level of protection. Paragraph 5.4.8 states that, unless the benefits, including need, of the development outweigh both its likely impact on the SSSI and any broader impacts on the national network of SSSIs, '*development on land within or outside a SSSI, and*

which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted'.

6.4.4 NPS EN-1 (Department for Energy Security and Net Zero, 2025) paragraph 5.4.18 states that the applicant should ensure that the '*ES clearly sets out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats'.*

6.4.5 NPS EN-1 (Department for Energy Security and Net Zero, 2025) paragraph 5.4.26 states that applicants should provide sufficient information to the SoS to determine whether a HRA Appropriate Assessment is required, and should include information on any mitigation measures that are proposed to minimise or avoid likely significant effects.

Appraisal

6.4.6 **Application Document 5.2 Habitats Regulations Assessment Report** has been produced for the purpose of informing a HRA in accordance with applicable legislation and Planning Inspectorate advice on HRA. The HRA Report provides the information required for an assessment to be carried out to determine whether the Project is likely to have a 'significant' effect on areas that have been internationally designated for nature conservation purposes, i.e. 'European sites', comprising SACs, SPAs and Ramsar sites potentially affected by the Project. The Humber Estuary SAC, Humber Estuary SPA and the Humber Estuary Ramsar site are located within the Order Limits. The Thorne and Hatfield Moors SPA is 2.7 km west of the Order Limits, Thorne Moor SAC is 2.7 km west of the Order Limits, and Hatfield Moor SAC is 5.73 km west of the Order Limits.

6.4.7 A HRA Screening was initially undertaken to assess whether the Project, without any detailed appraisal, is likely to result in a significant effect upon the conservation objectives of a European site. Following this, an assessment to inform Appropriate Assessment was undertaken, as set out in the HRA Report. This assessed effects on the integrity of the European site and its conservation objectives and considered ways to mitigate any potential for adverse effects. Following the assessment in the HRA Screening, the following impact pathways were scoped out of the Appropriate Assessment as there were no likely significant effects:

6.4.8 Construction:

- Direct loss of/damage to qualifying habitat, i.e. a habitat type that is listed as a reason for a European site's designation;
- Water quality;
- Hydrological changes; and
- Spread of invasive non-native species.
- Operation:
- Water quality;
- Airborne pollution, including dust deposition;

- Hydrological changes; and
- Disturbance of qualifying features.

6.4.9 The Appropriate Assessment set out in the HRA Report therefore considered the following impact pathways in its assessment of likely significant effects:

6.4.10 Construction:

- Loss of functionally linked land (FLL), i.e. areas of land occurring outside a designated site which are considered to be critical to, or necessary for, the ecological or behavioural functions in a relevant season of a qualifying feature for which a SAC/SPA/Ramsar site has been designated (Natural England, 2021);
- Airborne pollution, including dust deposition; and
- Disturbance of qualifying features, i.e. habitats and species listed as a reason for a European site's designation.
- Operation and maintenance:
- Loss of FLL;
- Barriers to movement; and
- Injury or mortality.

6.4.11 The Appropriate Assessment in the HRA Report concludes that the Project (either alone or in-combination with other plans or projects) would not result in an adverse effect on the integrity of a European site following the implementation of mitigation. Embedded, control and management and additional mitigation measures that are proposed to minimise or avoid likely significant effects are set out in the HRA Report, as well as where relevant in **Application Document 7.3 Register of Environmental Actions and Commitments**, **Application Document 7.2 Outline Code of Construction Practice**, **Application Document 7.8 Outline Landscape and Ecology Management Plan**, **Application Document 7.5 Outline Soil Management Plan**, and **Application Document 7.7 Outline Noise and Vibration Management Plan**, and these documents will be secured by **Application Document 3.1 Draft Development Consent Order**.

6.4.12 The Project is therefore in accordance with paragraphs 5.4.4, 5.4.5, 5.4.18 and 5.4.26 of NPS EN-1 (Department for Energy Security and Net Zero, 2025).

Regional and Local Ecological Sites, Habitats and Species

National planning policy context

NPS EN-1

6.4.13 NPS EN-1 (Department for Energy Security and Net Zero, 2025) paragraph 5.4.13 describes the policy in respect of sites of regional and local biodiversity and geological interest, and the important contribution of such sites to ecological networks and nature recovery, including wider benefits associated with public access to these sites. This includes Local Wildlife Sites (LWSs); paragraph 5.4.14 confirms that local development plan policies should *'secure their protection from harm or loss but also help to enhance them and their connection to the wider ecological networks.'*

6.4.14 NPS EN-1 (Department for Energy Security and Net Zero, 2025) paragraph 5.4.18 states that the applicant should ensure that the '*ES clearly sets out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance* […] *on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats'.*

6.4.15 Paragraph 5.4.43 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out that as a general principle, development should '*avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives* […]. *Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought'.*

6.4.16 Paragraph 5.4.22 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) outlines the opportunity for nature inclusive design throughout the design process, stating that '*energy infrastructure projects have the potential to deliver significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains*'*.*

6.4.17 NPS EN-1 (Department for Energy Security and Net Zero, 2025) paragraph 5.4.36 sets out that applicants should demonstrate appropriate avoidance, mitigation, compensation and enhancement measures in respect of biodiversity. These include, but are not limited to:

- Confining construction activities to minimum areas required for the works;
- Timing construction to limit disturbance;
- Best practice measures in construction and operation to ensure impacts to species and habitats are minimised;
- Restoration of habitats;
- Enhancement of existing habitats; and
- Where practicable, creation of new habitats of value.

6.4.18 Paragraph 5.4.42 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states '*the benefits of nationally significant low carbon energy infrastructure development may include benefits for biodiversity […] interests and these benefits may outweigh the harm to these interests'*.

6.4.19 Paragraph 5.4.49 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) requires the SoS to ensure that appropriate weight is attached to designated sites, ecological receptors and any relevant biodiversity and geological interests within the wider environment. Paragraph 5.4.54 states the SoS should give '*due consideration to regional or local designations. However, given the need for new nationally significant infrastructure, these designations should not be used in themselves to refuse development consent.*'

6.4.20 Paragraph 5.4.52 outlines that the SoS should use requirements and/or planning obligations to mitigate the harmful aspects of a development and, where possible, to conserve and enhance the site's biodiversity interest.

NPS EN-5

6.4.21 Paragraph 2.2.10 of NPS EN-5 (Department for Energy Security and Net Zero, 2025) explains that applicants must take into account Schedule 9 of the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to '*have regard to the desirability of preserving natural beauty, of conserving flora, fauna and* […] *do what* [they] *reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna* [...]'.

6.4.22 Paragraph 2.11.1 of NPS EN-5 (Department for Energy Security and Net Zero, 2025) states that '*where biodiversity impacts are identified, including those associated with bird collision with overhead lines, the Secretary of State should be satisfied that all feasible options for mitigation have been considered and evaluated appropriately'*.

NPPF and PPG

6.4.23 Similar to the policy tests in NPS EN-1 (Department for Energy Security and Net Zero, 2025) Policies N2 and N3 are set out in the NPPF (Ministry of Housing Communities and Local Government, 2026) to protect and enhance biodiversity and geodiversity, and are not repeated here. Guidance on biodiversity, geodiversity and ecosystems is also provided in PPG: Natural Environment (paragraphs 009 Reference ID: 8-009-20250219 to 035 Reference ID: 8-035-20190721) (Ministry of Housing, Communities and Local Government, 2025).

Local planning policy context

East Riding of Yorkshire Council planning policy

6.4.24 Policy S9 (Strengthening blue/green infrastructure) of the ERYCLP (East Riding of Yorkshire Council, 2025) requires proposals for development to incorporate a comprehensive design underpinned by consideration of existing and new blue/green infrastructure, and capitalise on opportunities to maintain, enhance and where possible, create links between blue/green infrastructure features.

6.4.25 Policy ENV4 (International, national and local sites of importance for biodiversity) requires the protection of statutory and non-statutory sites and requires proposals to follow the mitigation hierarchy to first avoid, then mitigate, and where necessary compensate for loss of, or harm to biodiversity.

6.4.26 Policy ENV5 (Enhancing biodiversity and geodiversity) requires proposals to conserve, restore, enhance or recreate biodiversity and geological interests, and safeguard, enhance, create and connect habitat networks.

North Lincolnshire Council planning policy

6.4.27 Policy CS17 (Biodiversity) of the NLCS (North Lincolnshire Council, 2011) seeks to protect North Lincolnshire's wildlife including nationally and internationally protected nature conservation sites, important habitats and species and non-statutory sites.

6.4.28 The NLLP (North Lincolnshire Council, 2003) includes the following policies that also seek to protect biodiversity and nature conservation interests:

- LC1 (SACs, SPAs and Ramsar Sites);
- LC2 (SSSIs and National Nature Reserves);

- LC3 (Local Nature Reserves);
- LC4 (Development Affecting Sites of Local Nature Conservation Importance);
- LC5 (Species Protection);
- LC6 (Habitat Creation); and
- Policy DS17 (Overhead Power Lines and High Powered Electrical Installations).

Bassetlaw District Council planning policy

6.4.29 Policy ST37 (Green and Blue Infrastructure) of the BLP (Bassetlaw District Council, 2024) seeks to protect the connectivity, quality, multifunctionality, biodiversity and amenity value of the green and blue infrastructure network, as well as protecting and enhancing the function, setting and biodiversity, landscape access and recreational value of main and minor green corridors. Policy ST38 (Biodiversity and Geodiversity) of the BLP seeks to enhance and protect statutory and non-statutory sites designated for nature conservation.

Neighbourhood planning policy

6.4.30 The following neighbourhood plans and policies are relevant to the Project in terms of ecology and biodiversity:

- East Drayton Neighbourhood Plan (2026) (East Drayton Neighbourhood Planning Group, 2026) Policy 3: Protecting and Enhancing Biodiversity;
- Treswell with Cottam Neighbourhood Plan (2024) (Bassetlaw District Council, 2019) Policy 9: Lee Beck Green Corridor;
- Sturton Ward Neighbourhood Plan (2021) (Sturton Ward Planning Group, 2021) Policy 2b: Enhancing biodiversity;
- Walkeringham Neighbourhood Plan (2021) (Walkeringham Neighbourhood Plan Steering Group, 2021) Policy 2: Protecting the Natural Environment and Landscape Character; and
- Misterton Neighbourhood Plan (2024) (Misterton Parish Council, 2024) Policy 2R: Improving Green and Blue Infrastructure and Biodiversity.

Appraisal

6.4.31 **Application Document 6.8 Environmental Statement Chapter 8 Ecology** presents the assessment of likely significant effects on ecologically sensitive receptors as a result of the Project which includes impacts on international, national and local statutory designated sites for nature conservation, non-statutory designated sites, habitats such as ancient woodland and veteran trees, priority habitats, important hedgerows and other terrestrial habitats, protected species and other species.

6.4.32 **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** presents the assessment of likely significant effects on birds as a result of the Project.

6.4.33 Ecological and ornithological matters were considered in the early stages of siting and design of the Project and embedded measures have been intrinsic to the design of the Project to reduce and where possible, avoid effects. **Application Document 7.17 Strategic Options Report Including Needs Case**, **Application Document**

7.18 Corridor and Preliminary Routeing and Siting Study, **Application Document 7.19 Supplementary Corridor and Routeing Report**, and **Application Document 5.9 Design Development Report** provide an overview of the design rationale for the Project. They explain how the Project has sought to avoid or reduce significant environmental effects from the initial option identification and site selection stage to the refinement of the Project, including siting, in response to feedback, further assessments and design work. The following considerations were an integral part of the Project's iterative design process:

- Sensitive routeing and siting to develop the proposed overhead line alignment and Order Limits to avoid or reduce as far as practicable the impacts upon designated sites, ancient woodland, veteran trees, areas of long established woodland, Priority Habitats, and other identified receptors.
- The crossing of the River Ouse has been designed to be upstream of its confluence with the River Trent to minimise the width of the crossing of the Humber Estuary SAC, SPA, Ramsar and SSSI, in addition to Blacktoft Sands RSPB Reserve. Installation of the proposed overhead line will avoid direct impacts to habitats inside these designated sites, with the exception of potential management (but not removal) of up to four trees which are covered by **Application Document 7.3 Register of Environmental Actions and Commitments** measure DE17 (above).
- The proposed overhead line has been routed to be broadly parallel with the existing 400 kV overhead line (taking into account the other environmental, socio-economic and technical considerations) to minimise the potential for effects on the interest features of the Humber Estuary designated sites.
- The Project design incorporates three areas of water vole habitat enhancement (mitigation areas), which will be created where clear span bridges (or suitably assessed and approved alternatives which also avoids affecting the bank within 5 m of the watercourse) cannot be provided, as further explained in **Application Document 7.8 Outline Landscape and Ecology Management Plan**. The mitigation areas are shown in **Figure A8.6.2 Survey Results and Habitat Suitability Assessments for Water Vole** in **Application Document 6.8.A6 Appendix 8.6 Otter and Water Vole Report**. The water vole mitigation areas will provide suitable alternative habitat for water voles which are displaced under licence from areas of watercourses which will be impacted during construction. **Application Document 7.8 Outline Landscape and Ecology Management Plan** outlines how the water vole mitigation areas will be managed.
- The Project design incorporates an otter mitigation area. There is one location where the closure of a potential otter holt may be required due to the undergrounding works of a third-party asset. Use of the potential holt is not confirmed at this time. The location of the existing potential holt and proposed mitigation area are confidential, and details are provided in the confidential/unredacted version of **Application Document 6.8.A6 Appendix 8.6 Otter and Water Vole Report**. The mitigation area is provided in the design as a precautionary measure, ensuring that if the holt is confirmed to be active during pre-construction surveys, a suitable alternative resting/breeding site would be provided prior to its closure. **Application Document 7.8 Outline Landscape and Ecology Management Plan** outlines how the otter mitigation area will be managed.

- The Project design incorporates areas inside the Order Limits for the installation of an artificial badger sett in the event that a main badger sett cannot be retained and must be closed. The location of the sett and proposed mitigation area are confidential, and details are provided in **Application Document 6.8.A5 Appendix 8.5 Badger Report (Confidential)**.
- Siting of the proposed infrastructure within the Order Limits to minimise potential impacts on protected habitats and species. Micro-siting of pylons during the design process has taken into account swing of the proposed overhead lines to avoid or minimise loss of woodland and trees as far as practicable.
- Appropriate stand-off distances have been applied to designated sites and Priority Habitats (including ancient woodland and long-established woodland) and watercourses to avoid direct effects where practicable.
- The Project design incorporates areas of proposed mitigation planting across the Order Limits; these are discussed in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and shown on **Application Document 6.4.F1 Figure 4.1 Proposed Project Design.** These areas have been chosen with a view to extend existing habitats, for example woodland areas, and/or provide links between existing areas of habitat.

6.4.34 Embedded measures are also set out in **Application Document 7.3 Register of Environmental Actions and Commitments** in relation to ecology and ornithology, and include:

- Where possible, the proposed overhead line has been designed to be parallel to or close parallel with the existing overhead lines. Route Sections where close parallel and pylon synchronicity has been achieved, considering constraints present along the existing overhead lines as well as technical complexity, include:
  - Sections within Route Sections A and B to reduce effects on the Yorkshire Wolds Important Landscape Area and potential effects of collision risk, habitat loss and disturbance of interest features of the Humber Estuary Special Protection Area (SPA) and Ramsar site; and
  - Route Section D to reduce effects on the Isle of Axholme Area of Special Historic Landscape Interest.
- Land used temporarily will be reinstated to its pre-construction condition and use (or as agreed with the relevant landowner). Hedgerows, fences, and walls (including associated earthworks and boundary features) will be reinstated to a similar style and quality to those that were removed, unless otherwise agreed.
- All trees within the Functionally Linked Land mitigation area as shown on **Application Document 6.4.F1 Figure 4.1 Proposed Project Design** will be retained.
- Appropriate stand-off distances have been applied to designated sites and Priority Habitats (including ancient woodland and long-established woodland) and watercourses to avoid direct effects where practicable.
- No tree pruning and or coppicing (inclusive of works within the Root Protection Areas) will occur on the following trees
  - T112 native Black Poplar - Populus nigra; and
  - T113 native Black Poplar - Populus nigra.

- Whilst located outside the Order Limits, these trees, by virtue of proximity, may overhang or grow beneath the ground into the land within the Order Limits. The locations of these trees are shown within **Application Document 7.14 Arboricultural Impact Assessment.**
- To avoid affecting habitat within the Humber Estuary Ramsar, SSSI, SAC, and SPA designated sites, the following three trees (Hawthorn – *Crataegus monogyna*) would be retained due to being located on the boundary (and therefore roots and canopy being within the designated site):

  – Category B tree (T85);

  – Category B tree (T86); and

  – Category C tree (not numbered).

  A further Category C tree (Hawthorn) is located within the boundary of the above sites and would also be retained. The locations of these trees are shown within **Application Document 7.14 Arboricultural Impact Assessment**, noting that Category C trees are not numbered.
- The Project has been designed to use existing watercourse crossing points as far as practicable to minimise the introduction of new crossings and associated impacts.
- Large or sensitive watercourses, for example those designated as main rivers, and those with Water Framework Directive (WFD) status, will be crossed by the construction access track using temporary clear span bridges (or suitably assessed and approved alternatives).
- The Project will install clear span bridges, or suitably assessed and approved alternatives, in all locations where pre-construction surveys identify the presence of water voles. The span length will be such that it avoids impacts to the banks, including the marginal and bankside vegetation (with the exception of trees and hedgerows) 5 m from the tops of the watercourse banks. Works to manage tree stems and canopies and hedgerows to facilitate bridge works may be undertaken within 5 m from the tops of the watercourse banks, but no root removal or ground disturbance will be permitted. All works to manage vegetation would be overseen by an Ecological Clerk of Works (ECoW).
- Pylons will be situated a minimum of 16 m from the top of bank of any designated main river and a minimum of 3.5 m from the top of bank of any ordinary watercourses.
- The final versions of the outline environmental management plans will be submitted for approval in accordance with Requirement 4 (construction management plans) of **Application Document 3.1 Draft Development Consent Order** prior to commencement of development and will reflect the final construction methodologies produced by the Main Works Contractor(s). The following will be produced prior to construction:

  – Code of Construction Practice (CoCP);

  – Construction Traffic Management Plan (CTMP);

  – Soil Management Plan;

  – Public Right of Way Management Plan;

- Noise and Vibration Management Plan;
- Landscape and Ecology Management Plan;
- Archaeological Written Scheme of Investigation;
- Cultural Heritage Management Plan; and
- Framework Construction Surface Water Management Plan (CSWMP).

- No vegetation clearance or canopy reduction will occur within Crowle Borrow Pits Site of Special Scientific Interest (SSSI).
- The Chesterfield Canal Site of Special Scientific Interest (SSSI) will be crossed using a clear span bridge or other suitably assessed alternative. The scaffolding either side of the SSSI will be set back from the boundary of the SSSI to retain bankside vegetation. Hedgerows and a tree (T170) within the SSSI will be managed to reduced height only and not removed.

6.4.35 These embedded measures, along with additional control and management measures which will be implemented during the construction of the Project to limit effects, are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, **Application Document 7.2 Outline Code of Construction Practice**, **Application Document 7.8 Outline Landscape and Ecology Management Plan**, **Application Document 7.7 Outline Noise and Vibration Management Plan**, and **Application Document 7.5 Outline Soil Management Plan**, and these documents will be secured by **Application Document 3.1 Draft Development Consent Order**. Specific control and management measures relating to ecology and ornithology include measures to manage dust, noise and vibration, appointment of an Environmental Clerk of Works (EnvCoW) during construction, environmental awareness training for construction workers, reinstatement of habitats after construction, protection of sensitive features, control of runoff and chemicals, measures to limit and optimise construction lighting, and strategic placement of haul roads to limit impacts on sensitive environmental features.

6.4.36 Construction exclusion zones (CEZs) will be established prior to construction to define working areas and ensure protection of retained habitats throughout the Project. Where practicable and with some exceptions where necessary, no construction works (temporary or permanent) will occur within the following environmental buffers:

- 10 m of a woodland block (or as detailed in the **Application Document 7.14 Arboricultural Impact Assessment**);
- 15 m of designated ancient and other Woodland with Characteristics of Ancient Woodland;
- 5 m of a hedgerow, plus Root Protection Areas (RPAs) for retained trees within the hedgerow;
- 10 m of a pond (holding water);
- 5 m of the top of a ditch;
- 10 m of an ordinary watercourse; and
- 16 m of a main river.

6.4.37 As noted above, there are some exceptions to this particularly relating to Woodland with Characteristics of Ancient Woodland, as set out in more detail in the irreplaceable habitats section below.

6.4.38 In addition to the above embedded and control measures proposed as part of the Project design, additional mitigation measures have been proposed in **Application Document 7.3 Register of Environmental Actions and Commitments** to further reduce significant environmental effects where they have been identified. The following additional mitigation measures are proposed (but are not limited to) in order to reduce significant effects on ecological receptors:

- All reinstated hedgerows and woodlands in the hazel dormouse licence area will include hazel (*Corylus avellana*) and Midland hawthorn (*Crataegus laevigata*) in the species mix.
- Yellow bird's-nest mitigation requirements are set out in **Application Document 6.8.A4 Environmental Statement Appendix 8.4 Botanical Report**. These include general mitigation measures which focus on keeping soils undisturbed, including implementing a 100 m buffer and timing restrictions, to protect the fungal networks on which this epiparasitic plant is dependent. Where this is not possible, a methodology for transplantation is provided.
- The Project is committed to adopting a sustainable approach to development by proactively exploring measures to ensure that the Project leaves the environment in a better condition than it was before development (including but not limited to delivering 10% BNG with potential for environmental and societal benefits). The Project will seek to provide strategic habitat enhancement and creation, aiming to identify and implement opportunities to improve habitat quality and connectivity and align with national nature recovery objectives and projects. Such measures may include specific habitat creation and enhancement measures and additional receptor-specific measures such as the creation of habitat piles and installation of bird and bat boxes.
- Planting and seeding operations will be undertaken during an appropriate planting/seeding season, and where planting is in locations not affected by other construction activities, planting will be undertaken at the earliest opportunity.
- Should pre-construction surveys prove this potential holt to be an active holt, the following additional mitigation measures would be applied. Prior to closure of the active holt (under licence), an artificial holt would be created to provide a suitable alternative resting/breeding site. The artificial holt would be sited within the otter mitigation area, and can be partially buried, secured with integral stakes, and covered in brash. The artificial holt would be away from main construction activity and habitat links to the existing otter holt would be maintained (e.g. hedgerows). Planting would be included as part of the licensed works and a suitable area fenced off to limit further disturbance and allow scrub to develop, further concealing the holt. Further discussion is provided in **Application Document 6.8.A6 Appendix 8.6 Otter and Water Vole Report and Application Document 7.8 Outline Landscape and Ecology Management Plan** outlines and secures how the otter mitigation area will be managed, should these measure be required.
- Should further/pre-construction surveys show badger sett 154 to be a main sett and/or that its tunnels are directed towards the working area, additional mitigation will be required. Firstly, evolution of the detailed design of the Project to move working areas away from sett 154 will be investigated and actioned. If this is not

practicable, the badger sett cannot be retained and must be closed under a granted Natural England badger licence. An artificial badger sett would be created (within the mitigation area incorporated into the Project design as part of embedded mitigation. Further discussion is provided in **Application Document 6.8.A5 Environmental Statement Appendix 8.5 Badger Report (Confidential) and Application Document 7.8 Outline Landscape and Ecology Management Plan.**

- Should notable aquatic macrophyte species be recorded during pre-constriction surveys or during construction, in a location where it could potentially be impacted by the works (for example through direct disturbance, or shading due to a bridge), appropriate mitigation would be agreed with the ECoW. This may include measures such as avoidance, translocation, or reseeding.
- In the event that kingfisher is identified to be nesting within 100 m of any construction access track or construction related activities adjacent to those drains listed in ON05, visual and acoustic screens will be installed along the adjacent banks (as per agreement with the ECoW), to prevent disturbance from works activities and construction traffic
- To reduce the magnitude and spatial extent of noise and visual disturbance in key areas visual/noise fencing/acoustic barriers will be installed around all relevant construction activities to be determined by the ECoW, at the following locations during key sensitivity periods, prior to the onset of any construction activities at ground level
- Alternative foraging habitat within arable farmland has been provided in Route Section B as illustrated on **Application Document 6.4.F1 Figure 4.1 Proposed Project Design.**
  - This land has been provided for use by pink-footed goose, golden plover, lapwing and curlew and has been secured exclusively for the creation and management of this supporting habitat, covering 46ha of farmland under an adequate, guaranteed inter-annual cropping regime.
  - The habitat has been provided within the geographic range currently utilised by the Humber Estuary SPA/Ramsar site qualifying species to ensure that birds will use this new foraging resource.
  - Since the Project will be constructed in phases (with different areas of potential functionally linked land being subject to disturbance at different points in time), this supporting habitat would be made available over the entire construction phase of the Project. and, as a maximum, for the lifetime of the Project to account for any potential loss of foraging habitat associated with displacement of birds from the immediate surrounds of the proposed overhead line during operation

6.4.39 Following the implementation of embedded, control and additional mitigation measures, **Application Document 6.8 Environmental Statement Chapter 8 Ecology** and **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** conclude that the Project, based on the current design as set out in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project** (where the LoD is not used), avoids residual significant adverse impacts on all international, national and local statutory designated sites for nature conservation including SSSIs, non-statutory designated sites, priority habitats, important hedgerows and other terrestrial habitats. This has been achieved by

following the mitigation hierarchy with the design process, and in accordance with the Holford Guidance, to avoid impacts where possible.

6.4.40 It should be noted that this conclusion is based on the assessment surveys that have been undertaken thus far for the Project. Additional 2026 surveys are currently continuing, and any additional assessment results would be provided in addendum reports following submission of the DCO.

6.4.41 **Application Document 6.8 Environmental Statement Chapter 8 Ecology** concludes that there would be a residual significant adverse effect on Yellow birds-nest, which is a wildflower, due to the permanent loss of plants due to pylon working areas (pylons 4ZQ78 and 4ZQ77), access, stringing works, and overhead line clearance (between 4ZQ78 and 4ZQ76) requiring felling and management of trees within woodland at or in the vicinity of the top of Bilks Hill, and therefore the associated fungal network that the plant is dependent on. As noted above and in Table 8.21 of **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, mitigation is proposed to ensure there would be no direct effects or encroachment on yellow bird's nest, however residual significant effects remain due to impacts to the fungal network that the flower relies on. The overriding public benefits and need for the Project are considered to outweigh this impact. There would be no other significant adverse effects on any other species or protected species, including all bird species.

6.4.42 It is also noted that if the LoD are used during construction near Jillywood Lane LWS, then habitats could be impacted in two locations. This would result in a significant adverse effect because the LWS has been recorded by the Project as containing Woodland with Characteristics of Ancient Woodland. Therefore, as a worst case, this habitat is considered irreplaceable. If the LoD is used, and trees are required to be removed at Jillywood Lane LWS, mitigation set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments** would ensure that any trees removed will not be removed to below ground level and not grubbed out to reduce the impact to soil and ground flora. Compensation would also be provided via new trees to be planted in proposed mitigation planting areas, outside the LWS, which are described in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and shown in **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.

6.4.43 A significant residual adverse effect is also anticipated on Socken Wood and Wood Farm Woodlands with Characteristics of Ancient Woodland (which are not included on the Ancient Woodland Inventory (AWI)). A significant residual adverse effect is also reported, only if the LoD are used, for one veteran tree. This is discussed in detail in the following section of this Planning Statement.

6.4.44 Therefore, based on the current design of the Project as set out in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project**, no significant adverse effects are expected on the majority of ecological sites, features, species and habitats, except for impacts on yellow birds-nest, and potential impacts on Woodlands with Characteristics of Ancient Woodland (which are discussed in the following section of this Planning Statement). As a worst case, if the LoD is used, there would be a significant adverse effect on Jillywood Lane LWS, and on one veteran tree. Impacts will be mitigated as far as practicable and compensation planting is proposed. Impacts relating to the Woodlands with Characteristics of Ancient Woodland at Jillywood Lane LWS are discussed in more

detail the following section. It is noted however that in accordance with paragraph 5.4.54 of NPS EN-1, the need for new nationally significant infrastructure means that local designations such as this should not be used in themselves to refuse development consent.

6.4.45 Following implementation of the mitigation measures proposed, the Project is in accordance with paragraphs 5.4.13, 5.4.14, 5.4.18, 5.4.36, 5.4.43 of NPS EN-1, paragraph 2.9.3–2.9.6 of NPS EN-5, the NPPF, PPG and relevant local policies relating to ecology and biodiversity.

Irreplaceable Habitats Including Veteran Trees

National planning policy context

NPS EN-1

6.4.46 Paragraphs 5.4.15 to 5.4.16 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) set out national policy consideration with respect to ancient woodland, ancient trees, and veteran trees. Paragraph 5.4.15 acknowledges that irreplaceable habitats would take a very significant time to restore, recreate or replace once they have been destroyed. Paragraph 5.4.16 states that the government will seek to *'maintain and enhance the existing resource of known ancient and veteran trees'* and that *'ancient and veteran trees found outside ancient woodland are also particularly valuable'* and that '*other types of irreplaceable habitats include blanket bog, limestone pavement, coastal sand dunes, spartina salt marsh swards, Mediterranean saltmarsh scrub and lowland fen'.*

6.4.47 While paragraph 5.4.15 identifies ancient woodland as an irreplaceable habitat, it is paragraph 5.4.33 which states that applicants should *'include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational phases'.*

6.4.48 NPS EN-1 (Department for Energy Security and Net Zero, 2025) paragraph 5.4.18 states that the applicant should ensure that the '*ES clearly sets out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance* […]*, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats'.*

6.4.49 NPS EN-1 (Department for Energy Security and Net Zero, 2025) paragraph 5.4.55 explains that the '*Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons, and a suitable compensation strategy exists'*.

NPPF and PPG

6.4.50 The NPPF Policy N6 (Ministry of Housing Communities and Local Government, 2026) sets out that irrespective of a site's status in nature conservation terms, development proposals which would entail the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

Local planning policy context

East Riding of Yorkshire Council planning policy

6.4.51 Policy ENV4 (International, national and local sites of importance for biodiversity) requires the protection of statutory and non-statutory sites and requires proposals to follow the mitigation hierarchy to first avoid, then mitigate, and where necessary compensate for loss of, or harm to biodiversity. This includes development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland, which will only be supported if it can be demonstrated that the need for, and benefits of, the development in that location would clearly outweigh the loss of habitat.

North Lincolnshire Council planning policy

6.4.52 The NLLP (North Lincolnshire Council, 2003) Policy LC12 requires all new development proposals to, wherever possible, ensure the retention of trees and woodland.

Bassetlaw District Council planning policy

6.4.53 Policy ST39 of the BLP (Bassetlaw District Council, 2024) concerns trees, woodland and hedgerows, reaffirming national policy by recognising ancient woodland and ancient, aged or veteran trees as irreplaceable habitats. Development resulting in their loss or deterioration will not be supported, unless in exceptional cases where the public benefit would clearly outweigh the loss or deterioration of the habitat.

Assessment conclusions

Context

6.4.54 In accordance with paragraph 5.4.18 of NPS EN-1, **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, **Application Document 7.14 Arboricultural Impact Assessment** and **Application Document 7.14 Arboricultural Impact Assessment**: Appendix E Veteran Tree Assessment Methodology set out the effects of the Project on trees and hedgerow, including irreplaceable habitats.

6.4.55 **Application Document 6.8 Environmental Statement Chapter 8 Ecology** sets out that only one area of designated ancient woodland (recorded on the AWI) is located within the Order Limits; Treswell Wood Ancient Woodland lies immediately adjacent to/just within the Order Limits, however, this is only a small overlap within the BNG Opportunity Area and there would be no loss or deterioration of this woodland as a result of the Project. The areas of ancient woodland that are present within the Order Limits and wider study area are shown on **Application Document 6.8.F2 Environmental Statement Figure 8.2 Nature Conservation Non-Statutory Designated Sites and Priority Habitat within 2 km**.

6.4.56 As detailed in **Application Document 6.8.A3 Environmental Statement Appendix 8.3 Habitat Survey Report**, **Application Document 6.8.A4 Environmental Statement Appendix 8.4 Botanical Report** and shown on **Figure A8.4.3 Woodland with Characteristics of Ancient Woodland**, a review of historic mapping identified eight areas of woodland inside the Order Limits, which are not currently part of the AWI (Natural England, 2026), or the revised counties dataset (Natural England, 2026), but for which there is evidence that they that would potentially qualify as

ancient woodland due to their age (woodland that has existed continuously since 1600). These Project-identified features are termed Woodlands with Characteristics of Ancient Woodland, and are listed below:

- Woodland at Jillywood Lane, which forms part of Jillywood Lane LWS, in Route Section A;
- Socken Wood, in Route Section A;
- Brantingham (small wood adjacent to Ellerker Road), in Route Section A;
- South of Dog Horse Plantation, In Route Section D;
- Part of Dixon Wood, in Route Section D;
- Part of Wood Farm, in Route Section E;
- Saundby Park Wood, in Route Section E; and
- Pigeon Field, in Route Section F.

6.4.57 There are no ancient or veteran trees in the Woodland Trust's Ancient Tree Inventory (Woodland Trust, n.d.) recorded within or up to 50 m from the Order Limits. However, arboricultural surveys carried out between July 2024 and February 2026 recorded 37 veteran trees and one veteran tree group within a 30 m study area of the Order Limits (not including the FLL mitigation area). Veteran trees are recorded and assessed in **Application Document 7.14 Arboricultural Impact Assessment** and **Application Document 7.14 Arboricultural Impact Assessment**: **Appendix E Veteran Tree Assessment Methodology.**

Impacts on Irreplaceable Habitat

6.4.58 As set out in **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, **Application Document 7.14 Arboricultural Impact Assessment** and **Application Document 7.14 Arboricultural Impact Assessment**: **Appendix E Veteran Tree Assessment Methodology,** following the implementation of embedded, control and management, and additional mitigation, the Project avoids significant adverse impacts on designated ancient trees and woodland, important hedgerows and veteran trees. This is based on the current Project design set out in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project** (if the LoD is not used).

6.4.59 Although no veteran trees would be removed based on the current design, if the LoD are used in Route Section A, there is the potential for one veteran tree (T4) to be lost during construction.

6.4.60 There are also 14 veteran trees that have been identified for management/pruning as per clearance requirements for the proposed overhead line as shown in **Application Document 2.4 Works Plans**, and a further seven veteran trees and one veteran group that may require management should the LoD be used in their locations. However, specific mitigation measures, including pruning specifications will be implemented to ensure there will be no significant effects, loss or deterioration, and these are included in **Application Document 7.14 Arboricultural Impact Assessment**: Appendix E Veteran Tree Assessment Methodology, **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**.

6.4.61 In addition to the above, as set out in **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, the current Project design would result in the loss of approximately 0.51 ha and the management of approximately 0.18 ha of Woodlands with Characteristics of Ancient Woodland, resulting in a residual significant adverse effect for Socken Wood and part of Wood Farm. This is due to permanent tree loss or management of limbs, where reinstatement is not possible due to the oversailing of the proposed overhead line, as well as impacts associated with the construction access road at the edge of Wood Farm. This amounts to the 'loss or deterioration' of the trees to be impacted within these woodlands.

6.4.62 No significant effects, loss or deterioration are expected on the remainder of any Woodlands with Characteristics of Ancient Woodland, which include Brantingham (small wood adjacent to Ellerker Road), in Route Section A; South of Dog Horse Plantation, In Route Section D; Part of Dixon Wood, in Route Section D; Part of Wood Farm, in Route Section E; Saundby Park Wood, in Route Section E; and Pigeon Field, in Route Section F.

6.4.63 As set out in paragraph 6.4.42 above, Jillywood Lane LWS also contains Woodland with Characteristics of Ancient Woodland. Although the current Project design would not result in impacts to the LWS, if the LoD are used to the north during construction near Jillywood Lane LWS, then habitats could be impacted in two locations (affecting approximately 130 m of the 2.5 km length of the of LWS) resulting in a significant adverse effect. This would amount to 'loss or deterioration' of the trees to be impacted within this woodland.

Appraisal

Policy test

6.4.64 As set out in NPS EN-1 (Department for Energy Security and Net Zero, 2025) paragraph 5.4.55 explains that the '*Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons, and a suitable compensation strategy exists'.*

6.4.65 In order to meet this test and establish that there are wholly exceptional reasons for the loss of or deterioration of irreplaceable habitat, it is essential to evidence that the mitigation hierarchy has been followed, that a suitable compensation strategy is in place, and that the public benefits and need outweigh the loss or deterioration. The following sections seek to address these points.

Mitigation hierarchy

6.4.66 Irreplaceable habitats including ancient woodland and trees, and veteran trees, have been a key consideration since the early stages of siting and design of the Project. **Application Document 7.17 Strategic Options Report Including Needs Case**, **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study**, **Application Document 7.19 Supplementary Corridor and Routeing Report**, and **Application Document 5.9 Design Development Report** provide an overview of the design rationale for the Project. They explain how the Project has sought to avoid or reduce significant environmental effects from the initial option identification and site selection stage to the refinement of the Project, including siting, in response to feedback, further assessments and design work.

6.4.67 **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** sets out the iterative appraisal and optioneering process undertaken in accordance with the Holford Rules. It explains that a core environmental objective from the outset was the avoidance of irreplaceable habitats, including ancient woodland. It states at section 5.6 that at the strategic corridor definition stage, ancient woodland was established as a high-sensitivity constraint. The document confirms that the vast majority of ancient woodland parcels within the wider study area were avoided altogether, with smaller parcels only encompassed within corridor boundaries where sufficient width and flexibility existed to secure total avoidance during subsequent routeing and detailed design stages. Section 12.3 of **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** describes the following specific design alternatives considered which sought to directly avoid or minimise impacts on ancient and mature woodland[i]:

- Section 1[1] (Route Section A, Creyke Beck – Skidby): Siting alternatives west of Creyke Beck evaluated a Northern Path that passed between two discrete blocks of ancient woodland at Birkhill Wood (paragraphs 12.3.4–12.3.5). This created a severe physical pinch point where achieving acceptable stand-off distances from ancient woodland was technically difficult. Progressing alternative paths to the south/centre avoided this pinch point and preserved adequate stand-off distances from Birkhill Wood.
- Section 2[1] (Route Section A, Skidby – A63 Dual Carriageway / Little Weighton and Rowley Road): An area of woodland on Rowley Road, south of Little Weighton, lies within the route corridor. Section 12.3 of the Study explains that of two route alternatives, the southern route affecting this woodland was preferred over the Northern Path, which was subject to '*technical and environmental constraints to routeing*'. The below comparative appraisal highlighted why the southern alignment was preferred on balance, despite directly interacting with this woodland:

  - **Landscape and Visual Consolidation:** While the Northern Path offered the potential merit of '*keeping the new and existing lines closer together to reduce the landscape and visual impacts and avoid the creation of a wirescape*', it concentrated overhead line infrastructure closer to Skidby and local settlements.
  - **Heritage and Residential Receptors:** In appraising the southern alignment, section 12.3.14 acknowledges that while '*A belt of mature woodland might be avoided to the southeast of Rowley Manor but more prominent angle pylons may be required*', and highlighting the consideration of the '*Visual impacts from some properties (including Rowley Manor Hotel and the Grade II* listed Church of St Peter)*' located nearby. The approach to design thereby lessened the high-sensitivity heritage impacts on Rowley Manor and the Grade II* listed church.
  - **Pre-existing Influence on Socken Wood:** While the preferred alignment affects woodland on Rowley Road near Socken Wood, this is an undesignated woodland (identified as a Woodland with Characteristics of Ancient Woodland) that is already bisected and influenced by the existing overhead transmission line. The overall route selection prioritised avoiding designated ancient woodland and preventing the dispersion of broader landscape impacts across previously undisturbed areas.

[1] Section extent as previously defined within **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study**.

- **Avoidance of Brantingham Dale SSSI:** Further west within Section 2, the southern alignment specifically avoids continuing through the steep topography and the '*substantive area of mature woodland in Brantingham Dale SSSI*'.

- Section 9[1] (Route Section E, Chesterfield Canal – A620): Between the River Ouse and High Marnham, the graduated swathe split into two discrete paths to navigate sensitive environmental features (paragraphs 12.3.76–12.3.77). The western path was explicitly defined to steer alignment away from and avoid blocks of ancient woodland around Saundby Park and Beckingham Wood.

- Section 10[1] (Route Section E, A620 – Fledborough): The swathe was aligned to pass comfortably east of Treswell Wood SSSI (an ancient semi-natural woodland reserve), ensuring sufficient separation to prevent direct habitat loss or hydrological severance (paragraph 12.3.85).

6.4.68 Further siting and access arrangements have been identified during ongoing design evolution. Specifically, the mitigation planting access off Rowley Road, west of pylon 4AF24, was shifted eastwards to reduce the physical extent of construction works near the eastern end of Socken Wood, while simultaneously preventing potential disturbances to a protected species nest site located nearby.

6.4.69 **Application Document 7.14 Arboricultural Impact Assessment: Appendix E Veteran Tree Assessment Methodology** also explains how the Project has followed the mitigation hierarchy to avoid or minimise impacts to irreplaceable habitats including ancient woodland and veteran trees as far as practicable. It sets out a number of embedded measures incorporated into the Project design to avoid or minimise impacts to irreplaceable habitats including ancient woodland and veteran trees. These are also set out in **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.8 Outline Landscape and Ecology Management Plan** and include:

- Micro-siting of pylons to take into account swing of the proposed overhead lines to minimise the instance where woodland would need to be cleared to avoid the overhead line swing, to avoid or minimise loss of woodland and trees as far as practicable.

- Designated ancient woodlands will be protected throughout the works with a minimum exclusion zone of 15 m offset from the edge of the designated ancient woodland. For any necessary works within the RPAs, an Arboricultural Clerk of Works (ArbCoW) will be consulted to agree the working method, including for example, where breaking ground is required and to remove compaction risks.

- All known veteran trees within, and which have canopy overhanging, the Order Limits will be retained with the exception of T4 Common Oak - *Quercus robur* which cannot be retained if the flexibility afforded by the Limits of Deviation were to be used. The locations of veteran trees are shown within Appendix D of **Application Document 7.14 Arboricultural Impact Assessment**.

- National Grid has committed to a 3:1 replacement for individual trees and individual trees within small groups. The Project will prioritise (where possible and practicable) the replanting for individual trees and small groups of individual trees within the Order Limits.

6.4.70 Specific measures during construction to minimise impacts to irreplaceable habitats such as adherence to good site practices and ensuring legal compliance, protective measures, crown management and pruning requirements are set out in **Application**

Document 7.3 Register of Environmental Actions and Commitments, Application Document 7.8 Outline Landscape and Ecology Management Plan and **Application Document 7.2 Outline Code of Construction Practice**.

6.4.71 Although the mitigation hierarchy has been applied and the Project design has intended to avoid impacts on irreplaceable habitats as far as practicable, the residual significant effects on Socken Wood and part of Wood Farm are unavoidable. While the LoD will only be used in this area where there is a clear engineering or safety need (or other reason to move a pylon within the LoD), should the LoD be used in relation to Jillywood Lane and veteran tree (T4) the Project will also have an impact on these irreplaceable habitats.

Compensation

6.4.72 It is acknowledged that Woodlands with Characteristics of Ancient Woodland and veteran trees are classed as being irreplaceable in NPS EN-1, therefore full compensation is unachievable.

6.4.73 However, reducing impacts on irreplaceable habitats are and have been a key consideration for the Project, and a compensation strategy is proposed for each area of irreplaceable habitat that would potentially be impacted, as set out below.

6.4.74 Should one veteran tree (T4) require removal if the LoD are used, compensation planting, as detailed in Table 8.2 of **Application Document 7.8 Outline Landscape and Ecology Management Plan** is proposed at Socken Wood which is an area of Woodland with Characteristics of Ancient Woodland (which is also located in Route Section A). A replanting ratio of 30:1 has been agreed with Natural England and East Riding of Yorkshire Council, secured through **Application Document 7.3 Register of Environmental Actions and Commitments**.

6.4.75 Mitigation is proposed for works within Socken Wood and Wood Farm as set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments Measures** and includes:

- Restricting tree loss to only those essential for the proposed overhead line clearance.
- All affected trees in Socken Wood will be soft felled.
- Where trees are coppiced and/or felled to facilitate the construction of the Project, sufficient trees (quantity agreed with the ArbCoW and ECoW) will be placed within the woodland and/or mitigation planting areas in locations agreed with the ECoW in the form of log piles (and not wood chips).
- For those not used for log piles, these will not be left as woodchip within the woodlands.
- Any trees removed within the area of potential ancient woodland will not be removed to below ground level and not grubbed out to reduce the impact to soil and ground flora.
- No other access will be taken for works through the woodlands to protect ground flora and retained trees.

6.4.76 To compensate for the significant residual effect on Socken Wood and part of Wood Farm, woodland planting is proposed and is secured in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and includes:

- Compensation planting for Socken Wood is proposed adjacent to Socken Wood, near pylon 4AF26 with links to the existing Socken Wood, following lines of a historic woodland previously present in this area, in order to restore the woodland. Planting would comprise deciduous woodland mix and woodland edge mix, with lower height species to be used under the proposed overhead line to maintain electrical clearances.
- Compensation planting for Wood Farm is proposed to the east of Wood Lane (and Wood Farm) near pylon 4AF194, along the watercourse to the east of Wood Lane and north of pylon 4AF195, comprising deciduous woodland mix with woodland edge mix planting. The species planted would have consideration of those removed during construction.

6.4.77 Additional potential compensatory measures that could be developed during detailed design could include phased tree surgery, genetic conservation and commitments to maintain and monitor compensation areas for a minimum of 30 years.

6.4.78 As set out above, National Grid has committed to a 3:1 replacement for individual trees and individual trees within small groups which would include replacement planting for Socken Wood and Wood Farm.

6.4.79 In terms of impacts at Jillywood Lane LWS if the LoD is used, and trees are required to be removed, mitigation is set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments** and includes**:**

- Any future detailed design will take into consideration the extent of the linear woodland and its associated buffer to reduce potential impacts as far as practicable.
- All affected trees will be soft felled.
- Any trees removed within the area of linear woodland will not be removed to below ground level and not grubbed out to reduce the impact to soil and ground flora.
- Any wood chipping will be done outside of the woodland and removed, to protect the ground flora.

6.4.80 Compensation tree planting is also proposed if the LoD is used and Jillywood Lane LWS is impacted. Planting is proposed to the north of pylon 4AF8 to the east of the A164 and adjacent to Jillywood Lane and would comprise deciduous woodland mix with woodland edge mix. The species mix would consider the existing planting along Jillywood Lane. This is secured in **Application Document 7.8 Outline Landscape and Ecology Management Plan.**

6.4.81 All mitigation planting areas are shown in **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.

Wholly Exceptional Circumstances

6.4.82 As noted above, paragraph 5.4.55 of NPS EN-1 and the corresponding footnote confirm that development consent should not be granted for any development that

would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists. The footnote to paragraph 5.4.55 provides that an example of wholly exceptional is "*where the public benefits (including need) of the nationally significant energy infrastructure would clearly outweigh the loss or deterioration of the habitat".*

6.4.83 As set out in sections 3 and 7.5 of this document, the Project is regarded by NPS EN-1 (Department for Energy Security and Net Zero, 2025) as nationally significant low carbon infrastructure which is a critical national priority project. The Project will provide the urgently needed reinforcement to the transmission system in the Humber and East Midlands. Without reinforcement, the capacity of the existing network in the Humber and East Midlands is insufficient to accommodate the connection of proposed new power sources connecting in the area. This reinforcement will ensure that, in accordance with national and local policies and targets, the Project will improve the existing electricity transmission network, and will contribute to energy independence, the UK's decarbonisation requirements and climate change targets, and assist in ensuring the supply of energy remains secure, reliable and affordable. This is a clear and substantial public benefit.

6.4.84 In addition, the Project would deliver 10% BNG with wider environmental and societal benefits in line with **Application Document 7.1 Biodiversity Net Gain Report**, and localised employment generation and benefits to the economy during construction.

6.4.85 It is therefore considered that impacts of the Project on irreplaceable habitat are justified on the basis that the following factors together provide wholly exceptional reasons and are sufficient to outweigh the loss or deterioration of woodland at Socken Wood and Wood Farm Woodlands with Characteristic of Ancient Woodland: the urgent and compelling public need and benefits of the Project; the absence of a reasonable alternative route or design capable of avoiding that harm; and the extent of mitigation embedded into the Project. These would also outweigh the potential loss or deterioration of one veteran tree (T4), and trees within Jillywood Lane LWS if the LoD are used.

Summary

6.4.86 In summary, National Grid considers that it has applied the mitigation hierarchy appropriately in designing the Project to avoid or reduce as far as possible, adverse effects on irreplaceable habitats. The location, routeing and siting of the Project has been designed to avoid and/or reduce impacts on designated ancient woodland and veteran trees as far as practicable. As the design currently stands and should the LoD not be used in Route Section A, the Project would not result in the loss or deterioration of any designated (on the AWI) ancient woodland or trees, or veteran trees. In the event that the LoD is used and the loss of one veteran tree is required, compensation planting (with a replanting ratio of 30:1) would be implemented as secured in **Application Document 7.3 Register of Environmental Actions and Commitments** and agreed with Natural England and East Riding of Yorkshire Council.

6.4.87 It is acknowledged that significant effects are reported on some areas of Woodlands with Characteristics of Ancient Woodland, which would result in the loss or deterioration of irreplaceable habitats at Socken Wood and Wood Farm. Mitigation is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan and Application Document 7.3 Register of Environmental**

Actions and Commitments to ensure that impacts are reduced as far as practicable, and compensation planting with a ratio of 3:1 is proposed and is secured in **Application Document 7.8 Outline Landscape and Ecology Management Plan**.

6.4.88 Mitigation and compensation planting (ratio of 3:1) is also proposed if the Project would result in the loss or deterioration of Woodland with Characteristics of Ancient Woodland within Jillywood Lane LWS (if the LoD are used in this location). These are secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**.

6.4.89 Therefore, in accordance with paragraph 5.4.55 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) it is considered that impacts of the Project on irreplaceable habitat are justified on the basis that the following factors together provide wholly exceptional reasons and are sufficient to outweigh the loss or deterioration of the irreplaceable habitat: the urgent and compelling public need and benefits of the Project; the absence of a reasonable alternative route or design capable of avoiding the impacts; and the extent of mitigation embedded into the Project (as set out in sections 3 and 7.5 of this Planning Statement). In addition, relevant compensation strategies which have been developed as far as possible, are provided within the Order Limits for potential impacts and are secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**. The compensation strategies will be finalised prior to any impacts arising. Therefore, it is considered that the Project is in accordance with paragraphs 5.4.15 to 5.4.16, 5.4.33 and 5.4.55 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) regarding irreplaceable habitats.

6.4.90 Therefore, in accordance with paragraph 5.4.55 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) it is considered that the overriding public need and benefit of the Project (as set out in sections 3 and 7.5 of this Planning Statement) would clearly outweigh the loss or deterioration of the habitat, and it would therefore be wholly exceptional. In addition, a relevant compensation strategy is provided within the Order Limits for potential impacts as far as possible and is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**. Therefore, it is considered that the Project is in accordance with paragraphs 5.4.15 to 5.4.16, 5.4.33 and 5.4.55 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) regarding irreplaceable habitats.

Biodiversity Net Gain (BNG)

National planning policy context

NPS EN-1

6.4.91 Section 4.6 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out the national policy in respect of environmental net gain and BNG, to ensure that projects not only avoid, mitigate and compensate for harm following the mitigation hierarchy, but also consider whether there are opportunities for enhancements.

6.4.92 Paragraph 4.6.6 requires that energy NSIP proposals '*seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible*'.

6.4.93 NPS EN-1 (Department for Energy Security and Net Zero, 2025) paragraph 4.6.7 adds to this by encouraging applicants for onshore elements of any development to *'use the latest version of the biodiversity metric to calculate their biodiversity baseline and present planned biodiversity net gain outcomes. This calculation data should be presented in full as part of their application'*.

6.4.94 NPS EN-1 (Department for Energy Security and Net Zero, 2025) paragraph 4.6.10 adds that BNG should be applied after compliance with the mitigation hierarchy and does not change or replace existing environmental obligations. Paragraph 4.6.11 states that BNG can be delivered on-site or wholly or partially off-site.

NPS EN-5

6.4.95 NPS EN-5 (Department for Energy Security and Net Zero, 2025) highlights in paragraph 2.5.1 that linear energy infrastructure provides opportunities to reconnect important habitats via green corridors, biodiversity stepping zones and re-establishing hedgerows.

Biodiversity Gain Statement

6.4.96 Section 9 details the information and evidence required for submission of a DCO application, stating at paragraph 9.2 that '*Applicants must submit an outline biodiversity gain plan to the Planning Inspectorate as part of their DCO application. The purpose of the outline biodiversity gain plan is to set out a strategy for how the proposed development will deliver the statutory biodiversity gain objective of at least 10%*'.

6.4.97 Paragraph 10.1 concludes that '*In accordance with sections 104 and 105 of the Planning Act 2008, the Secretary of State will not grant an application for development consent unless satisfied that the proposed development meets the biodiversity gain objective contained in this biodiversity gain statement. The Secretary of State can consider the biodiversity gain objective as met if there are requirements in the DCO securing it will be met*'.

NPPF

6.4.98 The NPPF (Ministry of Housing Communities and Local Government, 2026) provides in Policy N2 the various ways in which planning decisions should contribute to and enhance the natural and local environment. This includes minimising impacts on, and providing net gains for, biodiversity.

Local planning policy context

East Riding of Yorkshire Council planning policy

6.4.99 Policy ENV5 (Enhancing biodiversity and geodiversity) of the ERYLP (East Riding of Yorkshire Council, 2025) requires proposals to achieve a measurable BNG in line with the latest national requirements.

North Lincolnshire Council planning policy

6.4.100 Policy CS17 (Biodiversity) of the NLCS (North Lincolnshire Council, 2011) states that the Council will promote effective stewardship of wildlife by ensuring the development seeks to produce a net gain in biodiversity by ensuring wildlife is intrinsic to the design, and mitigating unavoidable impacts.

Bassetlaw District Council planning policy

6.4.101 Policy ST38 (Biodiversity and Geodiversity) of the BLP (Bassetlaw District Council, 2024) requires all new development to make provision for net biodiversity gain on-site. Where it can be demonstrated after following the mitigation hierarchy that this is not practicable, off-site provision will be considered.

Neighbourhood planning policy

6.4.102 The following neighbourhood plans and policies are relevant to the Project in terms of BNG:

- East Drayton Neighbourhood Plan (2026) (East Drayton Neighbourhood Planning Group, 2026) Policy 3: Protecting and Enhancing Biodiversity.
- Misterton Neighbourhood Plan (2024) (Misterton Parish Council, 2024):
  - Policy 1R: Sustainable Development and the Development Boundary;
  - Policy 2R: Improving Green and Blue Infrastructure and Biodiversity; and
  - Policy 6R: Renewable Energy, Energy Efficiency and Low Carbon Technologies.
- Walkeringham Neighbourhood Plan (2021) (Walkeringham Neighbourhood Plan Steering Group, 2021) Policy 2: Protecting the Natural Environment and Landscape Character.

Appraisal

6.4.103 **Application Document 7.1 Biodiversity Net Gain Report** has been prepared to quantify the overall effect of the Project on the biodiversity value, measured in biodiversity units using the Statutory Biodiversity Metric calculation tool (Defra, 2026) of habitats located within the BNG Boundary in accordance with paragraph 4.6.7 of NPS EN-1. The BNG Boundary has been defined with reference to the Biodiversity Gain Statement for Energy (Defra, 2026). It includes the LoD, and working areas (see **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project**).

6.4.104 **Application Document 7.1 Biodiversity Net Gain Report** concludes that the Project would achieve at least 10% BNG, in accordance with section 4.6 of NPS EN-1. To achieve a 10% BNG, the Project is predicted to require an additional 436.72 area habitat units, 70.46 hedgerow units and 12.65 watercourse units.

6.4.105 The Project proposes to address BNG requirements primarily through off-site habitat creation which will be secured through the purchase and allocation of registered off-site biodiversity units from suitably qualified biodiversity unit providers.

6.4.106 National Grid is also exploring opportunities to deliver BNG through habitat creation and enhancement within the Order Limits on land under its ownership or control where the habitats will not affect the operational requirements. Within the Order

Limits and adjacent to Treswell Wood, a 12.17-hectare area (the BNG Opportunity Area) has been identified as a potential on-site BNG mitigation location, although acquisition and use for BNG are not yet confirmed. High-level optioneering indicates a feasible habitat creation strategy focused on 'other woodland; broadleaved' targeting moderate condition, which would be coherent with the surrounding ancient-semi-natural woodland context and support landscape-scale connectivity goals.

6.4.107 Strategically, the proposed woodland creation would contribute to local biodiversity priorities for hazel dormouse (*Muscardinus avellanarius*) as set out in the Nottinghamshire and Nottingham Local Nature Recovery Strategy, achieving High strategic significance. Functionally, the habitat would extend the existing Treswell Wood assemblage and strengthen ecological networks across the local landscape, improving permeability and resilience for woodland-associated species.

6.4.108 From a quantitative BNG perspective, the BNG Opportunity Area is estimated to deliver approximately 40.03 area units, which would partially address the current Project shortfall of 436.72 area units. Given the provisional nature of baseline assumptions for this opportunity area (i.e. the assumed grassland condition) and the unconfirmed land acquisition, further site surveys and due diligence will be necessary to validate habitat condition, refine target condition trajectories for woodland creation, and confirm the deliverability and timing of the proposed units.

6.4.109 The balance between on-site and off-site delivery will be developed as the Project design and the BNG assessment develop through detailed design. The delivery strategy will seek to maximise ecological outcomes, long-term deliverability and security of outcomes, alignment with relevant Local Nature Recovery Strategies, and value for consumers.

6.4.110 In the event that on-site BNG delivery options are taken forward, National Grid will seek to establish on-site habitat creation and enhancement measures as early as practicable where habitats can be protected from construction activities and their early delivery would not prejudice the safe and efficient construction or operation of the Project. The programme for habitat creation and enhancement will be developed alongside the detailed Project design and construction programme.

6.4.111 The delivery of BNG will be secured through the relevant DCO requirement at set out in **Application Document 3.1 Draft Development Consent Order**, legal agreements and contractual arrangements, as appropriate, and will be implemented in accordance with the applicable consent requirements before the Project becomes operational.

6.4.112 Management, monitoring and reporting for onsite biodiversity gains will be undertaken in accordance with **Application Document 7.8 Outline Landscape and Ecology Management Plan** which will be secured by **Application Document 3.1 Draft Development Consent Order**. Off-site biodiversity gains will be managed, monitored and reported in accordance with the relevant legal and contractual arrangements and, where applicable, for a minimum period of 30 years.

6.4.113 Therefore, the Project is in accordance with paragraphs 4.6.6, 4.6.7, 4.6.10 and 4.6.11 of NPS EN-1; paragraph 2.5.1 of NPS EN-5; the Biodiversity Gain Statement, the NPPF and NPPG; and relevant local policies relating to BNG.

6.5 Historic Environment

National Planning Policy Context

NPS EN-1

6.5.1 Section 5.9 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out policy relating to the historic environment. Paragraph 5.9.1 highlights that the construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment above, at and below the surface of the ground.

6.5.2 Paragraph 5.9.2 sets out that the historic environment includes '*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, landscaped and planted or managed flora*'.

6.5.3 Paragraph 5.9.3 sets out what heritage assets may comprise and goes on to state '*the sum of the heritage interests that a heritage asset holds is referred to as its significance. Significance derives not only from a heritage asset's physical presence, but also from its setting*'.

6.5.4 Paragraph 5.9.4 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) recognises that some heritage assets' level of significance classifies them as designated heritage assets. The paragraph sets out the types of assets that would meet the criteria for World Heritage Sites and conservation areas. Paragraph 5.9.7 sets out that some heritage assets may not currently be designated, but have been demonstrated to be of equal significance to designated heritage assets. Paragraph 5.9.8 furthers this, stating '*non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments or Protected Wreck Sites should be considered subject to the policies for designated heritage assets*'.

6.5.5 Paragraph 5.9.11 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) requires applicants to undertake an assessment of any likely significant heritage impacts of the Project as part of the EIA. This should include consideration of heritage assets above, at, and below the surface of the ground, along with consideration of the possible impacts, including cumulative, on the wider historic environment.

6.5.6 Paragraph 5.9.12 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states that the applicant should *'provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by their setting. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on their significance'.*

6.5.7 Paragraph 5.9.19 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states '*where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State will require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part)*'.

6.5.8 Paragraph 5.9.28 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states '*when considering the impact of a proposed development on the significance*

of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance'.

6.5.9 Paragraph 5.9.29 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states '*any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification*'.

6.5.10 Paragraph 5.9.30 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states '*substantial harm to or loss of significance of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional*'.

6.5.11 Paragraph 5.9.31 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states '*substantial harm to or loss of significance of assets of the highest significance, including Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II* Listed Buildings; grade I and II* Registered Parks and Gardens; and World Heritage Sites, should be wholly exceptional*'.

6.5.12 In terms of decision-making, paragraph 5.9.32 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states *'where the proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to, or loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss…'*.

6.5.13 With regard to projects that will lead to less than substantial harm to designated heritage assets, paragraph 5.9.33 states '*this harm should be weighed against the public benefits of the proposal* […]'.

6.5.14 Paragraph 5.9.37 considers the positive and negative effects of projects on designated heritage assets and outlines that the SoS should give great weight to any negative effects when weighing them against the wider benefits of the application.

6.5.15 Paragraph 4.2.27 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) discusses how the SoS will consider the balance of benefits and impacts in relation to CNP infrastructure (such as the Project) where the NPSs (or any other planning policy) requires an outweighing of harm. Paragraph 4.2.28 states that where residual impacts remain after the mitigation hierarchy has been applied, in all but the most exceptional circumstances the residual impacts will be outweighed by the urgent need for CNP infrastructure. Therefore, as set out in paragraph 4.2.29 *'…the Secretary of State will take as the starting point for decision making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances'.*

6.5.16 Paragraph 4.2.30 follows this by providing a non-exhaustive list of policy tests that the SoS will consider whether the need case for CNP infrastructure satisfies. These include the requirement for the substantial public benefits of a project to outweigh substantial harm or loss of a heritage asset. It states that *'…the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests* […] *where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional'.*

NPPF and PPG

6.5.17 Policy HE4 of the NPPF (Ministry of Housing Communities and Local Government, 2026) explains that Heritage assets, as an irreplaceable resource, should be conserved in a manner appropriate to their significance. It states that development which would affect the significance of a heritage asset should conserve, or avoid harm to heritage assets in the first instance. If there will be harm to, or loss of the significance of, a heritage asset it will require clear and convincing justification. Policy HE5 sets out that assessments of the potential effects of development proposals on the significance of heritage assets should identify whether proposals would result in harm to the significance of a heritage asset, and should identify the degree of harm. Policy HE5 then states that substantial harm would occur where the development proposal would seriously affect a key element of the asset's significance. Policy HE6 sets out policy relating to the assessment of effects on heritage assets, which aligns with NPS EN-1 (Department for Energy Security and Net Zero, 2025) that a clear understanding of effects should be carried out.

6.5.18 Like NPS EN-1 (Department for Energy Security and Net Zero, 2025), the NPPF (Ministry of Housing Communities and Local Government, 2026) requires an assessment of harm to the significance of heritage assets affected by a proposed scheme. Policy HE6 of the NPPF states that where a proposed development will lead to substantial harm to a designated heritage asset, LPAs should refuse consent, unless it can be demonstrated that the harm or loss is necessary to achieve substantial public benefits or other criteria relating to the use of the site, or the harm is outweighed by the benefit of bringing the site back into use.

6.5.19 Policy HE7 of the NPPF requires the effect of a development proposal on the significance of non-designated heritage assets to be taken into account in the determination of the proposal.

6.5.20 PPG: Historic environment (Ministry of Housing, Communities and Local Government, 2019) supports the NPPF and provides further detailed narrative on the interpretation of harm, including the evaluation of significance.

Local planning policy context

East Riding of Yorkshire Council planning policy

6.5.21 Policy ENV3 (Valuing our Heritage) of the ERYCLP (East Riding of Yorkshire Council, 2025) supports proposals that positively and proactively conserve and enhance East Riding of Yorkshire Council's historic environment and heritage assets.

North Lincolnshire Council planning policy

6.5.22 Policy CS6 (Historic Environment) of the NLCS (North Lincolnshire Council, 2011) seeks to protect, conserve and enhance North Lincolnshire Council's historic environment, as well as the character and setting of areas of acknowledged importance including historic buildings, conservation areas, listed buildings (both statutory and locally listed), registered parks and gardens, scheduled ancient monuments and archaeological remains.

6.5.23 The following policies of the NLLP (North Lincolnshire Council, 2003) are of relevance to the protection of the historic environment:

- Policy HE2 (Development in Conservation Areas);

- Policy HE5 (Development Affecting Listed Buildings);
- Policy HE8 (Ancient Monuments);
- Policy HE9 (Archaeological Evaluation); and
- Policy DS17 (Overhead Power Lines and High Powered Electrical Installations).

Bassetlaw District Council planning policy

6.5.24 Policy ST40 (The Historic Environment) of the BLP (Bassetlaw District Council, 2024) seeks to conserve, enhance and sensitively manage the historic environment. Applicants are required to submit evidence examining the significance of any heritage assets affected through a Heritage Statement. Policy 41 (Designated and Non-Designated Heritage Assets) sets out the criteria which proposals should meet, with regard to designated and non-designated heritage assets.

Neighbourhood planning policy

6.5.25 The following neighbourhood plans and policies are relevant to the Project in terms of the historic environment:

- East Drayton Neighbourhood Plan (2026) (East Drayton Neighbourhood Planning Group, 2026) Policy 8: Protecting and Enhancing Heritage Assets;
- HUGS Neighbourhood Plan (2018) (Nether Headon, Upton, Grove and Stokeham Parish, 2018) Policy 2: Local Design Principles;
- Treswell with Cottam Neighbourhood Plan (2024) (Bassetlaw District Council, 2019) Policy 6: Local Design Code;
- Rampton and Woodbeck Neighbourhood Plan (2021) (Bassetlaw District Council, 2021) Policy 6: Heritage Assets in Rampton and Woodbeck;
- Misterton Neighbourhood Plan (2024) (Misterton Parish Council, 2024) Policy 8R: Protecting and Enhancing Heritage Assets; and
- Sturton Ward Neighbourhood Plan (2021) (Sturton Ward Planning Group, 2021) Policy 5: Design principles and Policy 6: Protecting the historic environment.

Assessment Conclusions

Overview

6.5.26 **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** provides an assessment of likely effects of the Project on designated and non-designated heritage assets during construction, and operation and maintenance of the Project. The chapter is supported by **Application Document 6.10.A2 Environmental Statement Appendix 10.2 Cultural Heritage Baseline Report** which lists and describes the designated and non-designated heritage assets relevant to the Project. Designated heritage assets are illustrated on **Application Document 6.10.F1 Environmental Statement Figure 10.1 Designated Heritage Assets within Study Areas**.

6.5.27 Cultural heritage matters were considered in the early stages of siting and design of the Project and the Project has undergone an iterative design process in order to minimise and avoid, where possible, harm to the historic environment. **Application**

Document 7.17 Strategic Options Report Including Needs Case and **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** provide the rationale for identifying the wider area within which the Project is located, and the preferred corridor the route should take. Once the need for the Project had been established, as set out in **Application Document 7.17 Strategic Options Report Including Needs Case** and section 3 of this Planning Statement, National Grid considered the different ways this need could be met to generate a preferred strategic option. Four options were considered at this stage with different geographical connection points. For each option, the technology options available for transmission system reinforcement, environmental and socio-economic constraints including cultural heritage, lifetime costs of each technology option, as well as initial capital costs, were considered. The strategic options considered and the reasons for the selection of the preferred option are set out in **Application Document 7.17 Strategic Options Report Including Needs Case**.

6.5.28 Following the selection of the strategic option, the development and refinement of preliminary corridor options was undertaken to identify and appraise corridors and preliminary routeing and siting options for the Project as set out in **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study**. This appraisal considered the potential effects on the environment including cultural heritage, along with the local community, relevant spatial planning policy and planning applications, other existing and proposed developments as well as technical, cost and engineering design considerations.

6.5.29 One of the key design decisions made in relation to designated heritage assets relates to the siting of the Project within Route Section 4 – River Ouse Crossing, and routeing west of Ousefleet, as set out in **Application Document 7.20 Design Development Report - 2025**. It is acknowledged that this is a significantly constrained section of the route which includes the nationally and internationally designated nature conservation sites of the Humber Estuary, the dispersed linear settlement of Ousefleet, Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190) (a scheduled monument), Ross Farmhouse (NHLE 1346748) and Blacktoft Sands Nature Reserve RSPB on the Humber Estuary which supports large numbers of protected bird species, most of which are qualifying species for the Humber Estuary designated sites.

6.5.30 It was therefore concluded in the site selection and corridor routeing and siting exercises that, when balancing the potential impacts in this highly constrained section of the route, harm to Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190) was outweighed by the significant and number of potential impacts of alternative routes in this location. These impacts would include effects on the nationally and internationally designated nature conservation sites of the Humber Estuary and the protected and qualifying bird species at RSPB Blacktoft Sands Nature Reserve, as well as impacts to Grade II listed buildings, residential properties in Ousefleet and in proximity to an eastern route, Ousefleet Village Hall and playing field, agricultural practices and potential further complexities of additional line swaps. No alternative alignment was identified within the graduated swathe, or more broadly within Route Section 4, that would avoid harm to Hall Garth without giving rise to materially greater adverse effects of this kind; the alternatives considered were accordingly not reasonable alternatives capable of avoiding the harm to Hall Garth.

6.5.31 In addition to siting and routeing considerations, a number of embedded mitigation measures have been incorporated into the design, as set out in **Application**

Document 7.3 Register of Environmental Actions and Commitments. Embedded measures include the following:

- To minimise setting change, the Project has been designed, where feasible, to be parallel or close parallel with existing overhead lines to reduce the spread of infrastructure in views. This measure was adopted within the Isle of Axholme Area of Special Historic Landscape Interest, where the proposed overhead line has been close paralleled with the existing overhead line, as much as feasible, to minimise setting change.
- Informed by feedback from local communities, Historic England and from Cultural Heritage Advisors (Archaeological Advisors and Conservation Officers) to the relevant local planning authorities, the route has been diverted, where feasible, to preserve or minimise change to the settings of heritage assets, including:
  - Grade II* listed North Leverton Windmill (NHLE 1234469) in Route Section E;
  - Grade II listed Windmill Cottage (NHLE 1276111) in North Leverton in Route Section E; and
  - Grade I listed remains of the Church of St Helen (NHLE 1216694), which is also designated a scheduled monument (NHLE 1006391), in South Wheatley in Route Section E.
- Informed by feedback from local communities, and where feasible, mitigation planting has been designed to reduce the visibility of the Project from within settlements, such as at the western edge of Beltoft village in Route Section D.
- The early identification through fieldwork survey and avoidance, where feasible, of areas of important archaeological remains. This includes the avoidance and preservation of Roman settlement remains in Route Section A, southwest of pylon 4ZQ74. Measures to protect archaeological areas during construction, and maintenance where applicable, are secured through **Application Document 7.10 Outline Cultural Heritage Management Plan**.
- Where it has not been feasible to design avoidance measures for archaeological remains that would be directly impacted by the Project, or where the heritage value of the archaeological remains does not merit preservation in situ, they will be archaeologically excavated and recorded in advance of construction activities. The programme of pre-construction archaeological works, which has been agreed with Historic England and the Archaeological Advisors to the relevant local planning authorities, and which includes on-site recording, post-excavation assessment, analysis, publication, and archiving, is secured through **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**.

6.5.32 Control and management measures to mitigate the impacts of construction on heritage assets will be carried out in accordance with **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**. These include the appointment of a suitably qualified Archaeological Clerk of Works (ACoW) to oversee the delivery of all necessary further archaeological evaluation and mitigation measures. Some archaeological works, comprising further archaeological evaluation and detailed archaeological excavation, will be carried out at the pre-construction phase, secured through **Application Document 7.9 Outline Archaeological Written Scheme of Investigation** and subsequent site-specific written schemes of investigation. Archaeological works and management measures during the construction, operation

and maintenance phases will be secured through **Application Document 7.10 Outline Cultural Heritage Management Plan**.

Designated heritage assets

6.5.33 **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** concludes that there are two designated heritage assets within the Order Limits, comprising Hall Garth moated site scheduled monument (NHLE 1013190) and Ellerker Conservation Area. The remaining designated assets are located beyond the Order Limits but within the defined study areas for the assessment, therefore the impacts assessed relate principally to changes to setting.

6.5.34 **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** anticipates that there would be a significant adverse effect on the setting of the following designated heritage assets:

- Risby Jacobean gardens, hall and medieval settlement remains (NHLE 1018600):
  - Construction (temporary moderate adverse effect): movement of vehicles along the construction access track and the presence of pylon assembly and installation plant would be perceptible from the scheduled monument. This would constitute a temporary change to a view which is historically relevant for understanding why the hall was constructed at its location.
  - Operation (permanent moderate adverse effect): the presence of pylons in fields to the south would appear in front of an existing 4ZQ overhead line, as seen from viewpoint HVP1 in **Application Document 6.10.A3 Environmental Statement Appendix 10.3 Cultural Heritage Visualisations**. This would introduce a new built component into views that may have influenced why the hall was built at this location and would therefore represent change to the appreciation of the hall's designed relationship with the landscape.
- Rowley Manor (NHLE 1161824):
  - Operation only (permanent moderate adverse effect): the presence of new pylons would result in a long-term change to the setting of the Manor House resulting in a diminished ability to appreciate the asset's relationship with its functional, rural, agrarian setting and the sense of isolation within which the asset is experienced. See viewpoints HVP2 (from the adjacent church southward) and HVP3 (from the landscape south of the Order Limits towards the asset grouping) in **Application Document 6.10.A3 Environmental Statement Appendix 10.3 Cultural Heritage Visualisations**.
- Romano-British villa at Cockle Pits, near Brantingham (NHLE 1014736):
  - Construction (temporary moderate adverse effect): The presence of the compound, possible overhead line electrical connection, and associated compound lighting would represent a new built component and change in views from the villa. The movement of vehicles along the construction access track to and from the compound would also result in a perceptible increase in activity levels in proximity to the villa. This would introduce a slight level of change to the experience of views that contribute to the understanding and appreciation of the asset, including its intervisibility with the settlement to the northeast and its relationship to the immediate landscape around it.

- Operation (permanent moderate adverse effect): Heritage viewpoint HVP9 in **Application Document 6.10.A3 Environmental Statement Appendix 10.3 Cultural Heritage Visualisations**, taken approximately 160 m north of the villa, shows that the proposed overhead line, specifically proposed pylon 4ZQ73, would be seen in the foreground of views between the scheduled monument and the settlement area, which would change the ability to appreciate the relationship between the two sites.

- Camera and moated site at Faxfleet Hall (NHLE 1007737):

- Operation only (permanent moderate adverse effect): proposed pylons would be seen behind the existing 4ZQ overhead line in the backdrop of views to the north. Long-range views do not form an important part of the asset's setting or value, but it is recognised that the presence of the Project would increase the density of pylons in the view which would make the visual context less sympathetic to the asset's rural character and would also lessen the ability to appreciate the wider landscape beyond the pylons.

- Yokefleet Hall (NHLE 1352658) and its associated Grade II listed West Lodge, gates, gate piers, walls and railings at Yokefleet Hall (NHLE: 1083334) non-designated East Lodge (HER: MHU14481) and non-designated parkland garden (A22):

- Operation only (permanent moderate adverse effect): the placement of new pylons within the landscape, in particularly pylons 4AF77 and 4AF78, and to a lesser degree pylon 4AF76, would permanently change the outward views experienced from the Hall, and also the experience of the hall within its parkland estuarine setting. Though existing pylons of the 4ZQ route have already changed this setting, proposed pylon 4AF77 would noticeably detract from the hall's prominence as a grand Victorian country house within its historic setting.

- Lighthouse on Bank of River Ouse (NHLE 1346751):

- Operation only (permanent moderate adverse effect): the placement of new pylons within the landscape, in particular pylon 4ZQ37, would diminish the prominence of the lighthouse within the landscape, a key component in its architectural and historic interest.

- Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190):

- Construction (temporary major adverse effect): the presence of pylon assembly and installation plant would introduce a level of noise and activity which is incongruous to the monument's rural setting and, while this would not physically impact the asset, it would represent comprehensive change to the experience of the asset's setting which would affect the ability to appreciate its value.

- Operation (permanent major adverse effect): the presence of the overhead line and new pylons at this proximity would introduce an industrial character that conflicts with the asset's predominantly rural character and would represent comprehensive change to its setting which would affect the appreciation of the asset's setting. Further, operational noise from the overhead line would introduce noticeable audible change to the experience of the asset. **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** indicates that Twin Warwick conductors may be used between pylons 4AF76 and 4AF80 and that potential adverse effects from noise are expected within the

distance from Hall Garth. As Hall Garth would be within 50 m of the proposed overhead line, based on the worst-case conductor type, operational noise from the proposed overhead line may result in a level of noise intrusion that would affect the ability to experience and appreciate the asset's setting and value, and which would be incongruous with its predominantly rural character.

- Group of assets at Whitgift Hall comprising: Whitgift Hall and attached walls and outbuildings Grade II* listed building (NHLE: 1083149); forecourt piers Grade II listed building (NHLE: 1162208); Coach-House/Stable/Granary Range and adjoining screen wall Grade II listed building (NHLE: 1083150); Stable Range and adjoining stableyard gateway Grade II listed building (NHLE: 1162178); and sundial Grade II listed building (NHLE: 1346752):

  - Operation only (permanent moderate adverse effect): the placement of new pylons within the landscape to the southeast would permanently alter the wider estuarine rural agrarian setting of the hall within which it is partially experienced and which forms part of the hall's historic functional setting.

- Church of St Mary Magdelene (NHLE 1083151):

  - Operation only (permanent moderate adverse effect): the placement of new pylons within the landscape, particularly pylons 4AF78 and 4AF77, would constitute a small magnitude of impact due to their detracting slightly from the architectural prominence of the church when viewed from within its historic landscape setting.

- Langholme Manor Farmhouse (NHLE 1067741):

  - Operation only (permanent moderate adverse effect): the Project would introduce pylons into a predominantly rural view, the alignment of which would cross in front of the farmhouse and then extend south at a slight oblique angle, resulting in a stacking effect of pylons in the view as shown in Viewpoint HVP45: View from Langholme Manor in **Application Document 6.10.A3 Environmental Statement Appendix 10.3 Cultural Heritage Visualisations**. This level of change to the wider, functional setting of the farmhouse would result in a noticeably different experience.

- Beacon Hill Camp (NHLE 1003241):

  - Construction (temporary moderate adverse effect): the movement of vehicles along the construction access track, and the presence of pylon assembly and installation plant, ranging in distances between 800 m and 830 m from the hillfort's summit, would be perceptible and would constitute a noticeable level of change that would affect the ability to appreciate the importance and relevance of long-range views as part of the hillfort's setting.

  - Operation (permanent moderate adverse effect): the placement of the proposed overhead line within the landscape, in particular proposed pylons 4AF186 to 4AF190, would permanently change views to the north and northeast as experienced from the asset, as illustrated in Viewpoint HVP49 in **Application Document 6.10.A3 Environmental Statement Appendix 10.3 Cultural Heritage Visualisations**. The operational Project would not entirely obstruct views, and Beacon Hill as a way marker and landmark would still be an appreciable part of its setting, but the presence of the Project would be noticeable and would slightly affect this aspect of the asset's experience.

- Gringley Grange Farmhouse (NHLE 1045102):
  - Construction (temporary moderate adverse effect): the movement of vehicles along the construction access track, and the presence of pylon assembly and installation plant which, at its closest, would be approximately 160 m northeast of the house, would be audibly and visually perceptible and would constitute a noticeable level of change within the wider, functional setting of the farmhouse.
  - Operation (permanent moderate adverse effect): the proposed overhead line within the landscape, in particular proposed pylons 4AF189 to 4AF191, would permanently change views to the north and northeast as experienced from the house. The level of change to the experience of the house and its setting would be noticeably different.
- Remains of the Church of St Helen (NHLE 1216694 and NHLE 1006391):
  - Operation only (permanent moderate adverse effect): the proposed overhead line is likely to be visible in the background of views through the chancel arch to the east, as illustrated on HPV53 in **Application Document 6.10.A3 Environmental Statement Appendix 10.3 Cultural Heritage Visualisations** which suggests that the operational Project would represent a new, prominent feature in views from the church tower looking through the chancel arch. This would constitute a noticeable change in the experience of the asset's setting.
- Church of St Peter and St Paul (NHLE: 1275773):
  - Operation (permanent moderate adverse effect): During the operational phase, the presence of new pylons within the landscape, in particular pylons 4AF209 – 4AF215, would diminish the prominence of the church tower in kinetic views travelling along Wheatley Road towards the settlement, and in kinetic views travelling northward on Leverton Road, approaching the settlement from the south.
- North Leverton Windmill (NHLE 1234469) and associated windmill cottage (NHLE 1276111):
  - Construction (temporary moderate adverse effect): the presence of pylon assembly and installation plant, approximately 720 m from the asset at its closest, would be highly visible from the windmill. While the activity would detract from the largely rural experience of the mill, the mill itself is a working industrial structure, and so the nature of the construction activity is not entirely incongruous with the asset's character. The activity would constitute a level of change that would slightly affect the asset's value and how it is experienced in its rural setting.
  - Operation (permanent moderate adverse effect): the presence of the proposed overhead line within the landscape, in particular proposed pylons 4AF221 to 4AF224, would permanently change views to the southwest and south from the asset (refer to HVP55 in **Application Document 6.10.A3 Environmental Statement Appendix 10.3 Cultural Heritage Visualisations**), but would also change views towards the mill from within the surrounding countryside, which is predominantly how the asset is appreciated and experienced, and potentially change its visual prominence as a local landmark.
- East Drayton Conservation Area and Grade I listed Church of St Peter (NHLE: 1212946), Grade II listed Yew Tree Farmhouse (NHLE: 1370123); and Farm

Buildings at Manor House Farm non-designated asset (NHER: M15674) within its boundary:

- Operation (permanent moderate adverse effect): The presence of the proposed overhead line would change the way the arrival to the conservation area is experienced, particularly in approaches from the west and south. This would introduce modern infrastructure into an experience that is overwhelmingly rural. Limited views of the Project would also be possible between buildings and in open spaces from within the conservation area, particularly in views eastward and southward from within the conservation area. Views in relation to the conservation area are represented by HVP60 and HVP61 in **Application Document 6.10.A3 Environmental Statement Appendix 10.3 Cultural Heritage Visualisations**.

- Whimpton Moor medieval village and moated site (NHLE 1017567):

- Construction (temporary moderate adverse effect): the presence of pylon assembly and installation plant, approximately 500 m from the asset, would not affect the immediate setting of the asset, but would constitute a noticeable level of change to the sympathetic rural backdrop which forms the setting in which the asset is experienced.

- Operation (permanent moderate adverse effect): the proposed overhead line within the landscape, in particular, proposed pylons 4AF246 to 4AF253, would permanently change views to the west and south across the rural backdrop in which the asset is experienced (Viewpoint HVP64 in **Application Document 6.10.A3 Environmental Statement Appendix 10.3 Cultural Heritage Visualisations**).

- Church of St Giles Grade II* listed building (NHLE 1212465):

- Operation (permanent moderate adverse effect): the presence of new pylons within the landscape to the east of the church, in particular pylons 4AF246 – 4AF249, would diminish the prominence of the church tower in kinetic views travelling along the A57 eastward through the settlement of Darlton which is one of the only key views towards the asset currently achievable due to the degree of mature vegetation in its churchyard.

Non-designated archaeological assets

6.5.35 **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** sets out that, following the implementation of embedded, control and management measures, including the carrying out of a programme of archaeological investigation prior to the commencement of construction activities in sensitive areas as set out in **Application Document 7.9 Outline Archaeological Written Scheme of Investigation** which will be secured by **Application Document 3.1 Draft Development Consent Order**, there would be no residual significant adverse effects on any non-designated archaeological assets.

Non-designated built heritage assets

6.5.36 There is one non-designated built heritage asset within the Order Limits, Platwoods Farm (HHER 7845), with the remaining assets located outside the Order Limits and within the 1 km study area.

6.5.37 None of the assets would experience permanent, physical impacts from the Project, but may experience temporary or permanent impacts arising from changes to their setting. However, these impacts would not be significant.

Other heritage features

6.5.38 **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** concludes that there would be no significant adverse effects anticipated in relation to Historic Landscapes, or Potentially Important Hedgerows.

Assessment of harm

6.5.39 A Heritage Statement of Harm (Appendix A of this Planning Statement) has been prepared which sets out the predicted harm upon designated heritage assets and non-designated heritage assets as a result of the Project. The purpose of the Heritage Statement of Harm is to assess, in accordance with national policy and guidance, the level of harm attributed to heritage assets, and whether the Project would result in substantial harm to heritage assets. Table 1.1 of the Heritage Statement of Harm sets out the anticipated degree of harm to be experienced by heritage assets. Those that are predicted to experience no impacts and no effect from the Project during construction, operation and maintenance are not included. The following is a summary of the anticipated degree of harm to be experienced by heritage assets:

- 49 designated heritage assets, five conservation areas and one non-designated heritage asset will experience harm at the lower end of the scale.
- Nine designated heritage assets and one conservation area will experience harm at the middle of the scale.
- One heritage asset (Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190)) will experience harm at the higher end of the scale.

6.5.40 As set out in the Heritage Statement of Harm, the effect from the Project to those assets experiencing harm at the middle, lower and higher end of the scale will not be substantial.

Appraisal

6.5.41 As described above, National Grid has undertaken an iterative design process taking account of policy requirements, historic landscape character assessments and desk-based and fieldwork analysis in order to minimise and avoid, where possible, harm to the historic environment. In accordance with the mitigation hierarchy, the design of the Project has sought to avoid, reduce or mitigate potentially significant adverse effects on designated and non-designated heritage assets. Design decisions have been made to balance the need to avoid and reduce impacts on heritage assets, along with other environmental, social and operational considerations. Embedded mitigation measures are also incorporated into the design to minimise impacts as far as practicable, as secured in **Application Document 7.3 Register of Environmental Actions and Commitments.**

6.5.42 Measures relevant to the control and management of impacts to the historic environment during construction have been included within **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.

6.5.43 Further measures relevant to archaeology are set out within **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**, with archaeological works and management measures during the construction, operation and maintenance phases secured through **Application Document 7.10 Outline Cultural Heritage Management Plan**.

6.5.44 **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** concludes that the Project would result in residual significant adverse effects on the setting of 28 designated heritage assets. There would be no residual significant adverse effects on any non-designated assets following the implementation of mitigation measures.

6.5.45 The Heritage Statement of Harm (Appendix A of this Planning Statement) concludes that in total, the Project would result in harm that is not substantial to 66 heritage assets, which comprises 59 designated heritage assets, six conservation areas and one non-designated asset. Most of this harm is at the lower end of the scale, with nine designated heritage assets and one conservation area at the middle of the scale, and one designated heritage asset (Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190) which is a scheduled monument) at the higher end of the scale. The Project would not result in substantial harm to any designated or non-designated heritage assets.

6.5.46 With regard to harm at the higher end of the scale for Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190), it was acknowledged during the routeing and siting exercise in in **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** that the preferred alignment would adversely affect the setting of the Hall Garth Moated site. This harm was deemed to be unavoidable, due to the need to avoid the significant and number of potential impacts of alternative routes in this location, including effects on the nationally and internationally designated nature conservation sites of the Humber Estuary and the protected and qualifying bird species at RSPB Blacktoft Sands Nature Reserve, as well as impacts to Grade II listed buildings, residential properties in Ousefleet and in proximity to an eastern route, Ousefleet Village Hall and playing field, agricultural practices and potential further complexities of additional line swaps.

6.5.47 Works within the boundary of Hall Garth would only consist of the removal of an existing wood pole electricity line, owned by Northern PowerGrid, which is proposed to be cabled underground beyond the site boundary, in order to avoid direct impacts to the heritage asset.

6.5.48 In addition, **Application Document 7.3 Register of Environmental Actions and Commitments** commits to measures relating to third-party access track to NPG-017 as shown on **Application Document 6.4.F4 Environmental Statement Figure 4.4 Third Party Works** within the boundary of the Scheduled Monument Hall Garth Moated site (NHLE 1013190). These include no breaking of topsoil and/or below ground disturbance for the duration of the works, and track matting or a similar protected surface will be laid to allow for the movement of construction vehicles to and from the works area.

6.5.49 Although the Project results in significant effects to designated heritage assets, there would be no substantial harm to any designated or non-designated heritage assets. It is considered that the overriding public benefits and need for the Project (as outlined in section 3 and 7 of this Planning Statement) would clearly and demonstrably outweigh the significant effects and harm that is not substantial to heritage assets.

6.5.50 Therefore, the Project is in accordance with 5.9.11 to 5.9.14, 5.9.16, 5.9.18 to 5.9.22, 5.9.23 to 5.9.29, 5.9.34 and 5.9.37 of NPS EN-1, NPS EN-5, NPPF, NPPG and relevant local policies relating to cultural heritage.

6.6 Flood Risk and Drainage

National Planning Policy Context

6.6.1 Section 5.8 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out policy relating to flood risk and paragraph 5.8.1 defines flooding as a natural process that plays an important role in shaping the natural environment, and also as a process that can threaten life, cause substantial disruption and damage property. Paragraph 5.8.6 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) outlines that the aims of planning policy are to ensure that flood risk from all sources of flooding is taken into account to avoid inappropriate development in areas at risk of flooding, and direct development to areas with the lowest risk of flooding.

6.6.2 Paragraph 5.8.7 states '*where new energy infrastructure is, exceptionally, necessary in flood risk areas (for example where there are no reasonably available sites in areas at lower risk), policy aims to make it safe for its lifetime without increasing flood risk elsewhere and, where possible, by reducing flood risk overall. It should also be designed and constructed to remain operational in times of flood*'.

6.6.3 The Sequential Test and Exception Test are outlined in paragraphs 5.8.9 and 5.8.10, and state that if, following the Sequential Test, it is not possible for a proposed development to be located in an area of lower flood risk then an Exception Test can be applied which may allow development to take place where areas of lower flood risk are not available. Paragraph 5.8.11 outlines that both of the following elements of the Exception Test must be satisfied for development to be consented:

- '*The project would provide wider sustainability benefits to the community that outweigh flood risk; and*
- The project will be safe for its lifetime, ta*king account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.*'

6.6.4 Paragraph 5.8.13 requires that a site-specific flood risk assessment should be provided for all energy projects in Flood Zones 2 and 3 and states '*in Flood Zone 1* […] *an assessment should accompany all proposals involving:*

- *sites of 1 hectare of more*
- *land which has been identified by the EA or NRW as having critical drainage problems*
- *land identified (for example in a local authority strategic flood risk assessment) as being at increased flood risk in future*
- *land that may be subject to other sources of flooding (for example surface water)*
- *where the EA or NRW, Lead Local Flood Authority, Internal Drainage Board or other body have indicated that there may be drainage problems*.'

6.6.5 Paragraph 5.8.14 highlights that the assessment should identify and assess the risks of all forms of flooding taking into account the effects of climate change. The

minimum requirements for a flood risk assessment are outlined in detail in paragraphs 5.8.15 and 5.8.16.

6.6.6 Where projects may be affected by or add to flood risk then applicants should arrange pre-application discussion with the Environment Agency and the Lead Local Flood Authority as outlined in paragraphs 5.8.18 to 5.8.20 of NPS EN-1 (Department for Energy Security and Net Zero, 2025).

6.6.7 Paragraph 5.8.36 states that '*In determining an Application for Development Consent, the Secretary of State should be satisfied that where relevant:*

- *The application is supported by an appropriate FRA;*
- *The Sequential Test has been applied and satisfied as part of site selection (subject to the exception set out in paragraph 5.8.22 of this NPS, and any technology specific exceptions set out in other NPSs);*
- *A sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk;*
- *The proposal is in line with any relevant national and local flood risk management strategy;*
- *SuDS (as required in the next paragraph on National Standards) have been used unless there is clear evidence that their use would be inappropriate;*
- *In flood risk areas the project is designed and constructed to remain safe and operational during its lifetime, without increasing flood risk elsewhere (subject to the exceptions set out in paragraph 5.8.22);*
- *The project includes safe access and escape routes where required, as part of an agreed emergency plan, and that any residual risk can be safely managed over the lifetime of the development; and*
- *Land that is likely to be needed for present or future flood risk management infrastructure has been appropriately safeguarded from development to the extent that development would not prevent or hinder its construction, operation or maintenance'.*

6.6.8 Paragraph 5.8.41 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out that energy projects should not normally be consented in Flood Zone 3b or on land expected to fall within these zones within its predicted lifetime, which may also apply to land subject to other sources of flooding (for example surface water flooding), but recognises that *'where essential energy infrastructure has to be located in such areas, for operational reasons, they should only be consented if the development will not result in a net loss of floodplain storage, and will not impede water flows'.*

NPS EN-5

6.6.9 NPS EN-5 (Department for Energy Security and Net Zero, 2025) paragraph 2.3.2 requires applicants, in situations where infrastructure is located near the coast or an estuary, to set out to what extent a proposed development is expected to be vulnerable, and as appropriate, how it has been designed to be resilient to flooding.

NPPF and PPG

6.6.10 Policy F5 of the NPPF (Ministry of Housing, Communities and Local Government, 2026) states that the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Policy F5 requires a sequential-based approach to be taken in areas known to be at risk now, or in future from any form of flooding. It also states *'Where the test applies, development proposals should not be located in areas at risk of flooding where alternative sites, appropriate for the development, are reasonably available in areas with a lower risk of flooding*'.

6.6.11 Policy F6 adds that having applied the Sequential Test, in certain circumstances development will only be appropriate if an 'exception test' is satisfied. The application of the exception test should be informed by a strategic or site-specific flood risk assessment and it involves demonstrating that the development would meet all the following criteria:

- '*Provide wider sustainability benefits to the community that outweigh the flood risk;*
- *Be safe for its anticipated lifetime in accordance with policy F7; and*
- *Not increase flood risk elsewhere and, where possible, reduce flood risk overall.*'

6.6.12 NPPF Policy F7 seeks to ensure development is safe from flooding and does not increase flood risk elsewhere. It states:

*'*Where development is proposed in a location known to be at risk from any form of flooding, now or in the future, it should be refused unless:

a. Within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons which justify a different arrangement;

b. The development will be safe throughout its lifetime taking account of the vulnerability of its users;

*c. Any residual risk can be safely managed, and safe access and escape routes are included where appropriate, as part of an agreed emergen*cy plan;

d. The development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment; and

*e. It can be demonstrated that flood risk wil*l not be increased elsewhere.*'*

6.6.13 PPG (Ministry of Housing, Communities and Local Government, 2016) sets out how the Sequential Test can be applied to the location of development setting out where it is not possible to locate development in low-risk areas, the Sequential Test should compare reasonably available sites:

- '*Within medium risk areas; and*
- *Then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.*'

Local Planning Policy Context

East Riding of Yorkshire Council planning policy

6.6.14 Policy S2 (Addressing Climate Change) of the ERYLP (East Riding of Yorkshire Council, 2025) seeks to steer development away from areas of high flood risk as far as possible, ensuring development is as resilient as possible to residual risks. Policy ENV6 (Managing environmental hazards) requires a sequential approach to site layout should it not be possible to successfully steer development to a site at low risk of flooding. ENV6 also considers surface water runoff, flood risk beyond the site, Sustainable Drainage Systems (SuDS), culverting, safe access and flood resistant and resilient mitigation.

North Lincolnshire Council planning policy

6.6.15 Policy CS19 (Flood Risk) of the NLCS (North Lincolnshire Council, 2011) supports development proposals that avoid areas of current or future flood risk, and which do not increase the risk of flooding elsewhere. Policy DS16 (Flood Risk) of the NLLP (North Lincolnshire Council, 2003) states that development will not be permitted within flood plains where it would increase the number of people or buildings at risk, impede the flow of flood water, impede access for maintenance of watercourses, reduce storage capacity in the flood plain or undermine the integrity of existing flood defences.

Bassetlaw District Council planning policy

6.6.16 Policy ST50 (Flood Risk and Drainage) of the BLP (Bassetlaw Local Plan, 2024) requires proposals to consider and, where necessary, mitigate the impacts of the proposed development on flood risk, on-site and off-site, commensurate with the scale and impact of the development. It also requires that, where relevant, proposals must demonstrate that they pass the Sequential Test and, if necessary, the Exception Test in Flood Zones 2 and 3 and ensure that where land is required to manage flood risk, it is safeguarded from development.

Neighbourhood planning policy

6.6.17 The following Neighbourhood Plans and policies are relevant to the Project in terms of flood risk and drainage:

- East Drayton Neighbourhood Plan (2026) (East Drayton Neighbourhood Planning Group, 2026) Policy 1: Sustainable Development, Infill and the Development Boundary;
- Misterton Neighbourhood Plan (2024) (Misterton Parish Council, 2024) Policy 1R: Sustainable Development and the Development Boundary;
- Treswell with Cottam Neighbourhood Plan (2024) (Bassetlaw District Council, 2023) Policy 9: Lee Beck Corridor;
- Sturton Ward Neighbourhood Plan (2021) (Sturton Ward Planning Group, 2021) Policy 1: Sustainable development, infill and the development boundary and Policy 4: Reducing the risk of flooding; and

- Walkeringham Neighbourhood Plan (2021) (Walkeringham Neighbourhood Plan Steering Group, 2021) Policy 1: Sustainable Development, Infill and the Development Boundary.

Assessment Conclusions

6.6.18 **Application Document 7.13 Flood Risk Assessment** (FRA) has been undertaken to understand whether the Project is likely to be at risk of flooding or is likely to increase flood risk elsewhere. The FRA focuses on flood risk from fluvial, surface water, costal and tidal, and groundwater sources from which the Project is most vulnerable to flooding.

6.6.19 **Application Document 6.11 Environmental Statement Chapter 11 Water Environment** also provides an assessment of the likely impacts of the Project on the water environment, which includes an assessment of the Project's impact in relation to flood risk.

6.6.20 As demonstrated in **Application Document 7.17 Strategic Options Report Including Needs Case**, a sequential approach has been taken to siting infrastructure for the Project, particularly those elements that are vulnerable to inundation.

6.6.21 The water environment and flood risk were considered in the early stages of siting, and design and embedded measures have been intrinsic to the design of the Project to reduce and where possible avoid flood risks and impacts on the water environment. Embedded mitigation measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, which is secured by **Application Document 3.1 Draft Development Consent Order**, and include:

- Where possible the design of the temporary haul roads has sought to utilise existing bridges and culverts in order to avoid physical disturbance, impacts on flow regimes.
- Large or sensitive watercourses, for example those designated as main river, and those with Water Framework Directive (WFD) status, will be crossed by the temporary haul road using temporary clear span bridges to avoid in-channel works and associated effects.
- Appropriate stand-off distances of 10 m have been applied to watercourses to avoid direct effects where practicable.
- Surface water runoff from construction sites, including haul roads and compounds, as well as from any permanent areas of new impermeable surface would be managed using SuDS techniques appropriate to local conditions.

6.6.22 In addition, measures to control and manage construction impacts are set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments** including those detailed in a Flood Warning and Evacuation Plan, and risks would be reduced and managed by programming construction activities in floodplains to avoid periods of likely high river levels where practicable.

Construction

6.6.23 In terms of the construction phase, six proposed temporary construction compounds are located in Flood Zone 1. However, there are three construction compounds, including south of Ousefleet, east of Ealand, and north of Misterton which are located

in Flood Zone 3. These three compounds have been sited following the application of a sequential approach and a lack of proximate feasible alternatives as detailed in **Application Document 7.17 Strategic Options Report Including Needs Case**. Due to its linear nature and the geographical extent of the Project, some temporary Project components for the construction phase of the Project, including haul roads and construction access, must necessarily be located in Flood Zones 2 and 3.

6.6.24 The FRA concludes that following the implementation of the mitigation measures set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, the risk to some temporary construction worksites from fluvial and tidal flooding would be medium, and the risk from surface water and groundwater would be low.

6.6.25 Overall, following the implementation of embedded measures and control measures, **Application Document 6.11 Environmental Statement Chapter 11 Water Environment** concludes that the Project would not result in any significant effects in relation to temporary effects on flood risk and drainage during construction of the Project.

Operation

6.6.26 Due to its linear nature and the geographical extent of the Project, while the siting of pylons within the defended floodplain has largely been avoided along the Project route due to the sequential approach to siting undertaken, some operational Project components, namely pylons, must necessarily be located in areas with a medium and high risk of flooding (Flood Zones 2 and 3), with some areas being within the floodplain. Following consultation with the Environment Agency, it was stipulated that compensatory storage for pylons within the floodplain would be required, where the pylons are located within the overtopping extents of defended rivers or where flow has the potential to be constricted in tidally dominated floodplains.

6.6.27 Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 Flood Risk Assessment** sets out the proposed location of floodplain storage compensation areas that are proposed on land outside of the floodplain. The compensation areas would be hydraulically linked to the area of loss, such that storage volume is replaced within the floodplain cell in which it is lost. The areas would also be designed to drain following a flood event. Given the very small volumetric losses (individually and cumulatively), it has been agreed with the Environment Agency that hydraulic modelling to demonstrate the effectiveness of the storage provision would not be required.

6.6.28 **Application Document 7.13 Flood Risk Assessment** therefore concludes that during operation over the Project lifetime, flood risk from fluvial, surface water, tidal and groundwater sources is assessed to be low, as operational infrastructure on the ground is limited to pylon bases. The residual risk, associated with the pylons in areas of medium to high risk, is assessed as low due to the low vulnerability of this type of infrastructure to inundation.

6.6.29 It is therefore concluded that during the operational phase, the Project is considered to be at low risk of flooding from all sources assessed due to the mitigation measures built into its design. The Project is not anticipated to increase flood risk elsewhere during its operation as any losses of floodplain storage would be compensated for. New impermeable surfaces would be very localised to pylon bases and rainfall runoff

from these areas would be attenuated by surrounding reinstated vegetation and would soak back into the ground.

6.6.30 Overall, following the implementation of embedded and additional mitigation measures including compensatory floodplain storage, **Application Document 6.11 Environmental Statement Chapter 11 Water Environment** concludes that the Project would not result in any significant effects in relation to flood risk and drainage during operation.

Appraisal

6.6.31 In accordance with paragraphs 5.8.13 to 5.8.16 of NPS EN-1, **Application Document 7.13 Flood Risk Assessment** has been prepared which assesses whether the Project is likely to be at risk of flooding or is likely to increase flood risk elsewhere.

6.6.32 The FRA concludes that from the outset of the Project, a sequential approach has been taken to siting infrastructure for the Project, particularly those elements that are vulnerable to inundation, as evidenced in **Application Document 7.17 Strategic Options Report Including Needs Case**, in accordance with paragraph 5.8.36 of NPS EN-1 and Policy F5 of the NPPF. The water environment and flood risk were considered in the early stages of siting, and design and embedded measures have been intrinsic to the design of the Project to reduce and where possible avoid flood risks and impacts on the water environment. Embedded mitigation measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, which is secured by **Application Document 3.1 Draft Development Consent Order**.

6.6.33 During construction, the FRA concludes that following the application of a sequential approach and a lack of proximate feasible alternatives as detailed in **Application Document 7.17 Strategic Options Report Including Needs Case**, three construction compounds are located in Flood Zone 3, in addition to some temporary haul roads and construction access which must necessarily be located in Flood Zones 2 and 3. The FRA concludes, however, that these risks would be reduced and managed by implementing a range of mitigation measures set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, including those detailed in a Flood Warning and Evacuation Plan, and by programming construction activities in floodplains to avoid periods of likely high river levels where practicable. Following the implementation of these measures, the residual risk is medium for fluvial and tidal flooding, and low for surface water and groundwater. Overall the construction of the Project results in no significant effects in relation to flood risk, as set out in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**.

6.6.34 The siting of pylons within the defended floodplain has largely been avoided along the Project route. However, due to the sequential approach to siting infrastructure, some operational Project components, namely pylons, must necessarily be located in Flood Zones 2 and 3 with some areas being within the floodplain. The Exception Test set out in Policy F6 of the NPPF is therefore triggered, and the FRA provides the evidence of how the Project satisfies this test. The FRA concludes that, with regard to the test, the Project is an NSIP that would play an important role in delivering renewable electricity efficiently, reliably and safely and would support the UK's move

towards net zero, therefore it would provide wider sustainability benefits to the community that outweigh flood risk.

6.6.35 In addition, permanent Project infrastructure which lies within areas at risk of fluvial or tidal flooding only comprises a small number of pylons. These pylons are resilient to flooding, given their concrete bases and metal lattice structures which would not be impacted by floodwaters, and so ensure the Project would be safe and could continue to operate in times of flood. A suite of measures would be adopted, as described in Table 3.1 of **Application Document 7.13 Flood Risk Assessment** and also set out in **Application Document 7.3 Register of Environmental Actions and Commitments** which is secured by **Application Document 3.1 Draft Development Consent Order**, to prevent flood risk increasing during operation of the Project.

6.6.36 Following consultation with the Environment Agency in accordance with paragraph 5.8.18 to 5.8.20 of NPS EN-1, it was stipulated that compensatory storage for pylons within the floodplain would be required. Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 Flood Risk Assessment** sets out the proposed location of floodplain storage compensation areas that are proposed on land outside of the floodplain.

6.6.37 The flood storage compensation proposals outlined in Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 Flood Risk Assessment** provide evidence that the Project, on the implementation of flood compensation areas within the same floodplain cell, will not increase the overall water level and therefore does not increase flood risk elsewhere. Furthermore, a conservative approach to calculating floodplain storages losses was taken, meaning the suggested volume for compensation areas likely exceeds the requirement. As such, there is the opportunity for the Project to reduce flood risk overall via these floodplain storage compensation areas. This is in accordance with paragraph 5.8.41 of NPS EN-1.

6.6.38 It is therefore concluded that during the operational phase, the Project is considered to be at low risk of flooding from all sources assessed due to the mitigation measures built into its design. The Project is not anticipated to increase flood risk elsewhere during its operation as any losses of floodplain storage would be compensated for. New impermeable surfaces would be very localised to pylon bases and rainfall runoff from these areas would be attenuated by surrounding reinstated vegetation and would soak back into the ground.

6.6.39 The Exception Test is therefore concluded to be satisfied, as the Project would bring significant benefits via its delivery of safe, reliable, and renewable electricity; would not result in an increase in flood risk elsewhere; and has been designed to be resilient to flooding throughout its lifetime.

6.6.40 Following implementation of the mitigation measures proposed, the Project is in accordance with paragraphs 5.8.13 to 5.8.41 of NPS EN-1, paragraph 2.3.2 of NPS EN-5, the NPPF, PPG and relevant local policies relating to flood risk and drainage.

6.7 Agriculture and Soils

National Planning Policy Context

NPS EN-1

6.7.1 Paragraph 5.11.12 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states that '*applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5)*'.

6.7.2 Paragraph 5.11.13 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) also seeks to ensure applicants identify and minimise any effects on soil health and protect and improve soil quality, taking into account any proposed mitigation measures. Paragraph 5.11.14 encourages applicants to develop and implement a Soil Management Plan.

6.7.3 Paragraph 5.11.34 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) requires the SoS to ensure that *'…applicants do not site their scheme on the best and most versatile agricultural land without justification'.*

6.7.4 Paragraph 5.11.34 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) further adds '*where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality*'.

NPPF and PPG

6.7.5 Policy N2 and of the NPPF (Ministry of Housing Communities and Local Government, 2026) and the PPG for Natural Environment (Ministry of Housing, Communities and Local Government, 2025) contain similar agriculture and soils policies to the NPSs and are therefore not repeated here.

Local Planning Policy Context

East Riding of Yorkshire Council planning policy

6.7.6 Policy S4 (Supporting Development in Villages and the Countryside) of the ERYLP (East Riding of Yorkshire Council, 2025) sets out that energy development will be supported outside settlement limits where it does not involve a significant loss of best and most versatile (BMV) agricultural land. Policy EC5 (Supporting the renewable and low carbon energy sector) requires that development and its associated infrastructure are acceptable in terms of effects on BMV agricultural land and soil resources.

North Lincolnshire Council planning policy

6.7.7 Policy RD1 (Development involving High Quality Agricultural Land) of the NLLP (North Lincolnshire Council, 2003) safeguards against the loss of BMV agricultural land unless the proposal cannot be located on land of a lower agricultural grade.

Bassetlaw District Council planning policy

6.7.8 Policy ST1 (Bassetlaw's Spatial Strategy) of the BLP (Bassetlaw District Council, 2024) seeks to minimise the use of BMV (grade 1–3 agricultural land) where practicable. Policy ST49 (Renewable Energy Generation) supports development for renewable energy generation subject to the satisfactory resolution of all relevant site-specific and cumulative impacts on BMV agricultural land.

Assessment Conclusions

6.7.9 **Application Document 6.13 Environmental Statement Chapter 13 Agriculture and Soils** has been prepared to describe how the construction, operation, and maintenance of the Project are likely to affect agriculture and soil receptors.

6.7.10 Agricultural land and soil matters were considered in the early stages of siting and design of the Project and embedded measures have been intrinsic to the design of the Project to reduce and, where possible, avoid effects. **Application Document 5.9 Design Development Report** and **Application Document 7.17 Strategic Options Report Including Needs Case** both provide an overview of the design rationale for the Project. They explain how the Project has sought to avoid or reduce significant environmental effects, including on agricultural land wherever practicable, from the initial option identification and site selection stage up to the refinement of the Project including siting, in response to feedback, further assessments and design work. Embedded measures in relation to agricultural land and soil are set out in **Application Document 7.3 Register of Environmental Actions and Commitments** and include:

- Implementation of a Soil Management Plan (SMP).
- The Project will use existing watercourse crossing points as far as practicable to minimise the introduction of new crossings and associated impacts on agriculture and soil.
- The storage of topsoil or other soft building materials within the works site will be given careful consideration. These will be made inaccessible to badgers (e.g. through fencing to ground-level).
- Temporary infrastructure such as construction compounds, laydown areas (as well as areas where impermeable material will be installed where heavy equipment would be used) and construction access routes would be drained using Sustainable Drainage Systems (SuDS) techniques that are suitable for local ground conditions and topography. These areas will be reinstated after completion of the temporary works, as agreed with the landowner.
- Land used temporarily will be reinstated to its pre-construction condition and use. Hedgerows, fences and walls (including associated earthworks and boundary features) will be reinstated to a similar style and or similar or higher quality to those that were removed, unless otherwise agreed.

6.7.11 In addition to these embedded measures, control and management measures set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments** will also be implemented to avoid and reduce impacts where possible during the construction period.

Construction

6.7.12 **Application Document 6.13 Environmental Statement Chapter 13 Agriculture and Soils** concludes that there would be a temporary loss of 1,512.62 ha of agricultural land from agricultural productivity during the construction period of the Project. Of this loss, 1,050.39 ha would be BMV land (ALC Grades 1, 2 and 3a). This results in a temporary significant adverse effect.

6.7.13 There would also be potential effects on agricultural operations due to disturbance (where livestock are present), fragmentation, access restrictions or disruption to water supplies or land drainage during the construction period. However, following the implementation of mitigation measures set out in within **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, it is concluded that, by the end of construction, land required temporarily would be reinstated. In addition, effects on agricultural operations during the construction phase would be dealt with through landowner agreements. Because of the mitigation proposed, the effects would not be significant.

6.7.14 In terms of soil function, **Application Document 6.13 Environmental Statement Chapter 13 Agriculture and Soils** concludes that the construction of the Project would result in disturbance to soils either from access across unstripped land for overhead line installation or removal, or due to soil stripping required for pylon footings and temporary construction areas. There would also be the potential for effects on the ecosystem services the soils provide. It is anticipated that the Project would adversely affect the ecosystem services that soils provide over an area of up to approximately 1617.20 ha.

6.7.15 Effective mitigation measures are set out within **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.5 Outline Soil Management Plan** for soil handling, storage and reinstatement which would reduce effects on soils. However, given the scale of the Project and construction activity required, it is considered that the effect of the construction phase on soil quality and its associated ecosystem services would result in a temporary significant adverse effect.

6.7.16 All land required (including areas where soils have been disturbed) temporarily would be reinstated by the end of the construction phase.

Operation and maintenance

6.7.17 **Application Document 6.13 Environmental Statement Chapter 13 Agriculture and Soils** concludes that there would be a permanent removal of 34.4 ha of BMV land as a result of the operation and maintenance of the Project. This includes land for the new-build pylon footings across the route, as well as land required for environmental and ecological mitigation, and areas for veteran tree compensation, mitigation planting, BNG mitigation and flood compensation. This results in a permanent significant adverse effect.

6.7.18 There would be no significant adverse effects on agricultural operations during the operation and maintenance of the Project, and any impacts will be dealt with through compensation agreements.

6.7.19 In terms of soil, during the operation and maintenance of the Project, where land use would be changed to enable environmental mitigation, the soils would not be

removed, and there may be potential benefits as a result of such changes in terms of soil health and soil function.

Appraisal

6.7.20 Agricultural land has been an important consideration from the outset of the Project's design, from siting to design development as demonstrated in **Application Document 7.17 Strategic Options Report Including Needs Case** and **Application Document 5.10 Design Approach Document**. In accordance with paragraph 5.11.12 of NPS EN-1 (Department for Energy Security and Net Zero, 2025), National Grid has, along with balancing operational, cost, safety, environmental and socio-economic factors, sought to minimise impacts on BMV agricultural land, and use land in areas of poorer quality where possible.

6.7.21 **Application Document 7.17 Strategic Options Report Including Needs Case** demonstrates that, without reinforcement, the transmission system between the north and south of England will have insufficient capacity to accommodate contracted and predicted generation connections in the area. Following an assessment of the options to meet this system need, when balancing cost, technical performance and environmental and socio-economic effects including agricultural land, it was proposed to take forward a new, primarily overhead line connection between a new Birkhill Wood Substation and a new High Marnham Substation.

6.7.22 Following the selection of the chosen strategic option, a CPRSS was undertaken in 2023 to further define the location of the proposed Project infrastructure within a defined study area (**Application Document 7.18 Corridor and Preliminary Routeing and Siting Study**) which also considered potential impacts to BMV agricultural land. It was concluded at this stage that, although the predominant land use within the corridor is agricultural and the Project may result in the permanent loss of agricultural land classed as high-quality, the overall land use for the Project is considered to be a small percentage of the overall area of agricultural land.

6.7.23 Following the identification of the Order Limits for the Project, the design has developed taking account of environmental surveys and assessments, engagement with stakeholders and technical and operational requirements and studies resulting in the design submitted as part of this DCO application. During this process, a number of changes have been made to the design following feedback from landowners regarding agricultural land and operations, as well as following environmental surveys and assessments which identified the need to reduce impacts on agricultural land or operations whilst balancing other factors. These are set out in detail in **Application Document 5.9 Design Development Report**.

6.7.24 Consultation feedback identified the opportunity to move some pylon positions by Melwood Hill and Graizelound towards field boundaries to reduce the Project's impact on agricultural practices. In addition, National Grid made an amendment to the proposed alignment to ensure there remains sufficient space to navigate agricultural machinery around pylons to maintain agricultural practices.

6.7.25 Following statutory consultation, National Grid engaged with Northern Powergrid to develop an alternative design of a distribution network operator asset near pylon 4AF80, which minimised impacts on the agricultural field whilst also avoiding the protected species and ground disturbance within the scheduled monument.

6.7.26 Temporary significant adverse effects are anticipated on BMV land and soils during the construction of the Project. There would be a temporary loss of 1,050.39 ha BMV

land from agricultural production during construction, and effects to the ecosystem services that soils provide over an area of up to approximately 1617.20 ha. Effective mitigation measures are set out within **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.5 Outline Soil Management Plan** for soil handling, storage and reinstatement which would reduce effects on soils. All land required (including areas where soils have been disturbed) temporarily would be reinstated by the end of the construction phase.

6.7.27 Following the amendments made to the design to consider agricultural land, and following the implementation of embedded, control and management measures, **Application Document 6.13 Environmental Statement Chapter 13 Agriculture and Soils** concludes that there would be a permanent removal of 34.4 ha of BMV land as a result of the operation and maintenance of the Project. Although some of this includes land for the new-build pylon footings across the route, much of the land is required for environmental and ecological mitigation, and areas for veteran tree compensation, mitigation planting, BNG mitigation and flood compensation. While those areas used for mitigation purposes are no longer in agricultural use during the operation of the Project, there may be potential benefits as a result of such changes in terms of soil health and soil function.

6.7.28 In addition, as set out in **Application Document 6.13 Environmental Statement Chapter 13 Agriculture and Soils** the areas of BMV agricultural land permanently required by the Project only account for 2.27% of all agricultural land within the Order Limits. Therefore, overall it is considered that, while the Project has not been able to avoid the use of BMV agricultural land completely, it is a small percentage of the overall area of agricultural land, and the urgent need for reinforcement of the transmission system to accommodate contracted and predicted generation connections in the area outweighs the use of BMV agricultural land.

6.7.29 Therefore, following the implementation of embedded, control and management measures, the Project is in accordance with paragraphs 5.11.12, 5.11.12, and 5.11.34 of NPS EN-1; and with the NPPF, NPPG and relevant local policies relating to agricultural land and soil.

6.8 Traffic and Transport

National Planning Policy Context

NPS EN-1

6.8.1 Section 5.14 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out the policy requirements for the consideration and mitigation of transport related impacts. Paragraph 5.14.4 states *'…consideration and mitigation of transport impacts is an essential part of government's wider policy objectives for sustainable development…'*.

6.8.2 If a Project is likely to result in significant transport implications, then in accordance with paragraph 5.14.5 of NPS EN-1 (Department for Energy Security and Net Zero, 2025), the applicant's ES should include a vision for transport and an assessment of potential impacts. Paragraph 5.14.7 requires applicants to consult with National Highways and highways authorities as appropriate, including with regard to mitigation that informs the application.

6.8.3 Paragraph 5.14.8 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out that applicants should prepare a travel plan to identify demand management and monitoring measures to mitigate impacts on transport. Paragraph 5.14.9 adds that *'the assessment should also consider any possible disruption to services and infrastructure (such as road, rail and airports)'.*

6.8.4 NPS EN-1 (Department for Energy Security and Net Zero, 2025) paragraph 5.14.13 requires applicants to consider a modal shift of freight from road to more environmentally sustainable alternatives at all stages of the project. Paragraph 5.14.14 requires regard to be given to the needs of freight at all stages in the construction and operation of the development.

6.8.5 Paragraph 5.14.15 states that '*the Secretary of State may attach requirements to a consent where there is likely to be substantial HGV traffic that… control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routeing of such movement… and ensure satisfactory arrangements for reasonably foreseeable abnormal disruption…*'.

6.8.6 Paragraph 5.14.19 recognises that energy NSIPs may result in substantial impacts on surrounding infrastructure and seeks to ensure the applicant mitigates these impacts including during the construction phase. Paragraph 5.14.22 states that *'the Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision'*.

NPPF and PPG

6.8.7 Section 15 of the NPPF (Ministry of Housing Communities and Local Government, 2026) covers '*Promoting sustainable transport*' and the PPG provides advice on '*Transport evidence bases in plan making and decision taking*' (Ministry of Housing, Communities and Local Government, 2015) and '*Travel Plans, Transport Assessments and Statement*' (Ministry of Housing, Communities and Local Government, 2014). These policies and guidance are similar to those in NPS EN-1 (Department for Energy Security and Net Zero, 2025) and are therefore not repeated here.

Local Planning Policy Context

East Riding of Yorkshire Council planning policy

6.8.8 Policy ENV1 (Integrating high quality design) of the ERYLP (East Riding of Yorkshire Council, 2025) encourages applications which promote equality of safe movement for all users of the site, including access, egress and minimising highways safety risks.

North Lincolnshire Council planning policy

6.8.9 Policy CS25 (Promoting Sustainable Transport) for the NLCS (North Lincolnshire Council, 2011) requires that transport provision is integrated into the design of all development from the outset of any development project.

6.8.10 Policy T2 (Access to Development) of the NLLP (North Lincolnshire Council, 2003) sets out that all development must be provided with a satisfactory access, including being adequately served by the existing highway network.

Bassetlaw District Council planning policy

6.8.11 Policy ST49 (Renewable Energy Generation) of the BLP (Bassetlaw District Council, 2024) supports development subject to the satisfactory resolution of all relevant site specific and cumulative impacts upon existing highway capacity and highway safety. Policy ST53 (Promoting Sustainable Transport and Active Travel) supports development that contributes towards a sustainable, safe, active transport network that offers a range of public transport and active travel choices.

Assessment Conclusions

6.8.12 **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** sets out the assessment of likely effects of construction traffic generated by the Project. The scope and methodology of the assessment have been informed by the Design Manual for Roads and Bridges (DMRB). While the Project comprises linear electricity transmission rather than highway construction, the DMRB provides the established, nationally recognised benchmark for evaluating how temporary changes in traffic volume, composition, and physical access impact human receptors across the road network. Applying DMRB-aligned criteria ensures a robust, standardised framework to identify receptor sensitivity and quantify the magnitude of impact across both the Strategic Road Network (SRN) and local highway corridors. In accordance with this framework, the assessment evaluates effects on non-motorised users, including:

- Severance;
- User delay;
- User amenity;
- Fear and intimidation; and
- PRoW temporarily closed with and without diversions.

6.8.13 Utilising DMRB principles enables the assessment to capture the interaction between heavy vehicle movements and network capacity, informing an evidence-based appraisal of effects on motorised users across sensitive links and junctions. The assessment includes effects on motorised users, comprising:

- Driver/passenger delay; and
- Highway safety for motorised users.

6.8.14 Navigational impacts are also assessed in **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport**.

6.8.15 The assessment of effects in **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** is supported by **Application Document 7.15 Transport Assessment**. The purpose of the Transport Assessment (TA) is to report any additional elements typically required under TA guidance but not reported in the ES.

6.8.16 The study area for the assessment was defined based on the area where there is likely to be a transport impact resulting from the construction of the Project. This includes Primary Access Routes (PARs) along which HGVs would travel during construction, as well as routes that would be used by light goods vehicles (LGVs) only, including construction worker movements. The study area includes key highway links which provide a route between the site and SRN. These links have been used to form the PARs for the construction of the Project. The PARs are presented in **Application Document 6.14.F1 Environmental Statement Figure 14.1 Primary Access Routes**. PARs include sections of the SRN or specific A-classification roads, referred to as the Major Road Network (MRN).

6.8.17 In terms of severance, driver / passenger delay, non-motorised delay, non-motorised user amenity, fear and intimidation, and road closures and diversions, the PARs between junctions have been used as proxy receptors for the receptors they serve, such as drivers, pedestrians, and local communities.

6.8.18 The assessment within **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** considers impacts during the construction phase of the Project. Operational and maintenance movements (foot patrols, light vehicles, occasional Heavy Goods Vehicles (HGVs)) are expected to be well below the threshold of a 30% increase, or 10% increase on sensitive links (IEMA, 2023), over existing flows and would not give rise to significant effects. Operational and maintenance activity would require a limited workforce, with infrequent access required to ensure the operational Project is appropriately surveyed, assessed, and maintained.

Non-Motorised Users

6.8.19 In terms of Severance, the assessment of effects in **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** concludes that with the implementation of mitigation and control measures, no significant adverse effects are anticipated on any sensitive receptors during construction. Baseline conditions across the study area reflect a predominantly rural PRoWs and active travel network, where pedestrians, cyclists, and equestrians rely on local lanes, footpaths, and bridleways for daily movement between settlements and essential community facilities. For local communities, uncontrolled construction traffic can introduce physical barriers across roads and village links, disrupting daily routines such as walking children to school, accessing local shops, or visiting neighbours. Through the provision of safe, managed crossing points, clear sightlines, and traffic controls secured in **Application Document 7.4 Outline Construction Traffic Management Plan**, physical separation between communities and their local destinations is avoided, ensuring everyday connectivity is retained.

6.8.20 The assessment also concludes that following mitigation, there are no PARs with residual adverse effects with respect to Non-Motorised User Delay, User Amenity, and Fear and Intimidation during construction of the Project. Baseline user activity across the surrounding highway network is accustomed to relatively low baseline vehicle flows, meaning that the introduction of heavy construction plant may increase anxiety, deter active travel, and has the potential to degrade the quiet, rural character of local journeys. To protect the user experience and ensure people feel safe using shared roads:

- HGV movements will be scheduled outside of peak local travel hours, with specific curfews applied during weekday morning drop-off and afternoon pick-up periods near local primary schools to protect children and parents;
- Speed restrictions, vehicle escorting where necessary, and driver behavioural protocols will be enforced under **Application Document 7.4 Outline Construction Traffic Management Plan** to minimise intimidation and protect user confidence;
- Environmental management commitments in the **Application Document 7.2 Outline Code of Construction Practice**, including regular road sweeping and dust suppression, will maintain clean, safe, and pleasant corridors for walkers, cyclists, and equestrians, avoiding loss of amenity.

6.8.21 While impacts are anticipated on a number of PRoWs as a result of temporary closures or diversions during construction, following the implementation of mitigation measures, no significant effects have been identified following the assessment in **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport**.

6.8.22 The baseline network features regionally important recreational routes, including the Trans Pennine Trail (OUSEB01) and National Cycle Network (NCN) Route 65, which contribute substantially to local quality of life, recreational tourism, and health and well-being. Unmanaged disruption to these assets could cause route fragmentation, extended detour distances, or user frustration.

6.8.23 Embedded mitigation and control and management measures in relation to PRoWs are set out in section 5 of **Application Document 7.6 Outline Public Rights of Way Management Plan**, ensuring that path closures are avoided wherever practicable through the use of marshalled crossings. Where temporary diversions are unavoidable during safety-critical works (such as overhead conductor stringing), safe, clearly signposted, and comparable alternative routes will be provided before works commence, maintaining continuous public access and recreational enjoyment throughout the construction phase.

Motorised Users

6.8.24 In terms of Driver Delay, baseline traffic conditions across the study area are characterised by relatively low daily vehicle flows on rural distributor roads and local lanes, connecting outward to the MRN and SRN. Baseline surveys and link appraisals reported in **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** and detailed in **Application Document 6.14.A4 Environmental Statement Appendix 14.4 Magnitude of Change** identified that 27 of the 64 screened-in PARs experience negligible baseline congestion and would incur no significant adverse effects even prior to mitigation. Across the wider network, construction-related trips, comprising HGVs transporting materials and LGVs carrying construction personnel, will be temporary, phased, and dispersed across multiple access points rather than concentrated onto a single corridor.

6.8.25 For the people who live, work, and travel within the area, traffic delays represent direct disruptions to daily routines. Unmanaged congestion directly affects local residents, commuters travelling to regional employment centres, school-run traffic, agricultural operators moving machinery between land parcels, and delivery services relying on predictable journey times. Long queues and slow-moving construction

vehicles can induce driver frustration, journey time uncertainty, and severed access to vital community services and amenities.

6.8.26 To prevent these impacts on everyday road users, robust control and demand-management measures have been embedded into the project design:

- **Off-Highway Haul Routes:** The Project incorporates continuous, temporary haul tracks along the overhead line alignment, using existing bridges and culverts where practicable. By enabling plant and construction vehicles to travel internally between pylon sites, a substantial volume of heavy traffic is removed entirely from the local public highway network.
- **Peak-Hour Avoidance:** Workforce travel is managed under the Outline Construction Workforce Travel Plan within **Application Document 7.4 Outline Construction Traffic Management Plan**. Core site working hours are set between 07:00 and 19:00 on weekdays. Personnel will arrive prior to 07:00 and depart after the evening commuter peak, avoiding coincidence with existing baseline peak-hour highway traffic and preventing added delays for morning and evening commuters.
- **Minimising Impacts on Sensitive Receptors:** Where PARs pass directly past sensitive community locations, such as primary schools, HGV deliveries will be scheduled to avoid weekday morning drop-off and afternoon pick-up windows. This eliminates conflict with vulnerable road users, parents, and school buses, safeguarding local access and preserving highway safety.

6.8.27 Consequently, with these controls secured through **the Application Document 7.4 Outline Construction Traffic Management Plan** and the **Application Document 7.3 Register of Environmental Actions and Commitments**, traffic increases on any single route will remain minor and short-term. Local motorists and passengers will experience negligible delays, public transport and emergency service access will be protected, and baseline journey time reliability will be maintained throughout the construction programme.

6.8.28 **Application Document 7.15 Transport Assessment** concludes that the Project would not give rise to unacceptable impacts on highway safety or cause severe residual cumulative impacts on the road network in the AM and PM peak hours. Baseline accident analyses evaluated across the PAR network (**Application Document 6.14.F3 Environmental Statement Figure 14.3 Collision Data**) confirm that the local highway network operates without systemic safety deficits or accident cluster hotspots that would be exacerbated by Project traffic. Construction traffic effects are temporary, modest in absolute terms, and distributed across the road network. No individual highway link is anticipated to experience a material HGV uplift capable of exceeding junction capacity, altering junction operational performance, or inducing poor driver behaviour.

6.8.29 In human terms, highway safety concerns typically manifest as fear and intimidation among local motorists when encountering heavy commercial plant on narrow rural roads, or anxiety regarding turning conflicts at junctions. Because construction traffic movements will be managed under pre-agreed routing protocols, vehicle tracking swept-path clearances, and speed controls secured in the **Application Document 7.4 Outline Construction Traffic Management Plan**, the safe operational geometry of the network is preserved. Motorists, rural road users, and local communities will not face elevated collision risks or compromised road conditions, ensuring that public

safety and driver confidence are maintained across both local and strategic road networks in full accordance with NPS EN-1 (paragraph 5.14.22) and the NPPF.

Navigation

6.8.30 A navigational risk assessment has been produced to support the application and is included in **Application Document 7.22 Navigational Risk Assessment**. The assessment considers the likely interaction between construction activities associated with the Project and navigation across five watercourses, the River Ouse; Stainforth & Keadby Canal; River Idle; Market Weighton Canal; and Chesterfield Canal.

6.8.31 The River Ouse presents the highest relative level of navigational risk due to the volume and diversity of vessel traffic, including powered recreational craft and the influence of tidal conditions. Consequently, hazards relating to personal injury and grounding are most prominent at this location.

6.8.32 The assessment concludes that the navigational risks associated with the Project are low and manageable across all watercourses. While the River Ouse presents the greatest relative risk due to traffic levels and tidal influences, this risk is effectively mitigated through planned closures and active vessel management. Following implementation of mitigation measures, the Project is not anticipated to have any significant adverse effects on navigation

6.8.33 Measures to manage construction traffic impacts are set out in **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.4 Outline Construction Traffic Management Plan**. The measures set out include construction working hours and worker travel patterns, and timing controls for HGV movements. PRoWs will be managed in accordance with **Application Document 7.6 Outline Public Rights of Way Management Plan**.

6.8.34 **Application Document 6.21 Environmental Statement Chapter 21 Inter-project Cumulative Effects** conclude that no significant effects are anticipated upon the strategic or local road networks as a result of construction traffic generated by the Project when combined with construction and operational traffic associated with other committed developments in isolation or combined.

Appraisal

6.8.35 In accordance with NPS EN-1 paragraphs 5.14.4 and 5.14.5 an assessment of the potential transport impacts of the Project has been undertaken as set out in **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** and **Application Document 7.15 Transport Assessment**, with consideration given to ways in which to mitigate these impacts. The scope of the assessment and approach taken was discussed and agreed with National Highways and the relevant highways authorities in accordance with NPS EN-1 paragraph 5.14.7.

6.8.36 The assessment concludes that the traffic generated during all phases of the Project would not result in significant adverse effects on severance, user delay, user amenity, fear and intimidation and PRoW diversions and/or closures, driver/passenger delay, highways safety, and navigational impacts.

6.8.37 A limited number of temporary diversions are required for PRoWs impacted by the construction of the Project. The Project has been designed to minimise adverse

impacts to PRoWs, with temporary short term diversions and appropriate mitigation measures set out in **Application Document 7.6 Outline Public Rights of Way Management Plan**. Following the implementation of mitigation, no significant impacts are anticipated on PRoWs.

6.8.38 In accordance with paragraph 5.14.8 of NPS EN-1, details of control and management measures, including those relating to construction staff travel movements, are set out within **Application Document 7.4 Outline Construction Traffic Management Plan**. As a result of the Project there are no expected impacts on airports and no closures of railway required in accordance with paragraph 5.14.9.

6.8.39 Paragraph 5.14.13 of NPS EN-1 requires consideration of a modal shift of freight from road to more environmentally sustainable alternatives. Engagement with the Canal and River Trust has confirmed that the use of canals would not be appropriate for construction traffic and the movement of materials. Therefore, in accordance with paragraph 5.14.14, the assessment considers the needs of freight, with construction trips to be taken by road. No significant effects are anticipated as a result of the construction traffic using road. **Application Document 7.4 Outline Construction Traffic Management Plan** sets out measures to encourage active travel for construction staff.

6.8.40 In accordance with paragraph 5.14.15, HGV movements will normally take place during the core working hours, and construction vehicles will be scheduled to arrive throughout the core working hours. The construction vehicle traffic movements will be managed though the monitoring and management mechanisms set out in **Application Document 7.4 Outline Construction Traffic Management Plan**. Given the robust arrangements that would be available to monitor and review these traffic movements, the comprehensive trip generation and distribution approach and the proposed mitigation measures, a cap on HGV numbers is not considered necessary.

6.8.41 As demonstrated by the assessment, there would be no unacceptable impact on highway safety or adverse cumulative effects as a result of the Project when compared with other committed developments in isolation or combined, in accordance with NPS EN-1 paragraph 5.14.22.

6.8.42 In conclusion, with the implementation of appropriate mitigation and control measures, including those in **Application Document 7.4 Outline Construction Traffic Management Plan**, there is not expected to be any residual significant adverse environmental effects on severance, user delay, user amenity, fear and intimidation, driver/passenger delay, highway safety, and navigational impacts. Effects on PRoWs from a limited number of diversions during construction will be appropriately managed through the measures contained in **Application Document 7.6 Outline Public Rights of Way Management Plan**.

6.8.43 As there is no unacceptable impact on highway safety or cumulative impacts on the road network as a result of the Project, it is considered to be in accordance with relevant transport and access policies in NPS EN-1, the NPPF and the relevant local plans.

6.9 Air Quality

National Planning Policy Context

NPS EN-1

6.9.1 Section 5.2 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out policy relating to air quality and emissions with paragraph 5.2.1 acknowledging that energy infrastructure can have adverse effects on air quality during the construction, operation and decommissioning phases. Paragraph 5.2.8 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states '*where the project is likely to have adverse effects on air quality the applicant should undertake an assessment of the impacts of the proposed project as part of the ES*'.

6.9.2 **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** provides an assessment of the likely significant effects of the Project on air quality. Paragraph 5.2.9 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) advises that the ES should describe:

- '*existing air quality concentrations and the relative change in air quality from existing levels;*
- *any significant air quality effects, mitigation action taken and any residual effects, distinguishing between the project stages and taking account of any significant emissions from any road traffic generated by the project;*
- *the predicted absolute emissions, concentration change and absolute concentrations as a result of the proposed project, after mitigation methods have been applied; and*
- *any potential eutrophication impacts.*'

6.9.3 Paragraph 5.2.13 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) requires that the SoS should '*consider whether mitigation measures are needed both for operational and construction emissions over and above any which may form part of the project application*'.

6.9.4 Section 5.7 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out policy in relation to dust, odour, artificial light, smoke, steam and insect infestation. Paragraph 5.7.5 sets out that applicants should assess the potential for emissions of odour, dust, steam, smoke and artificial light to have a detrimental impact on amenity, as part of the ES. Paragraph 5.7.6 states that in particular, the assessment should describe:

- *'the type, quantity and timing of emissions*
- *aspects of the development which may give rise to emissions*
- *premises or locations that may be affected by the emissions*
- *effects of the emission on identified premises or locations*
- *measures to be employed in preventing or mitigating the emissions'.*

6.9.5 Paragraph 5.7.12 of NPS EN-1 requires the SoS to be satisfied that an assessment of the potential for dust to have a detrimental impact on amenity has been carried out, and that all reasonable steps have been taken to minimise such impacts.

NPPF and PPG

6.9.6 Policy P3 of the NPPF (Ministry of Housing, Communities and Local Government, 2026) states '*proposals should* […] *sustain and contribute to compliance with relevant limit values or national objectives and targets for air pollutants including PM2.5. Development proposals should take account of Air Quality Management Areas and be consistent with the objectives of relevant Air Quality Action Plans, Clean Air Plans and Local Air Quality Strategies*' and '*Where possible, opportunities should be taken to reduce pollution affecting the wider area (such as through traffic and travel management* […]'.

6.9.7 The PPG: Air quality (Ministry of Housing, Communities and Local Government, 2019) Paragraph: 006 Reference ID: 32-006-20191101 sets out the considerations that may be relevant when determining planning applications including with regard to vehicle emissions, exposure to harmful concentrations of air pollution, unacceptable impacts during construction, and adverse effects on biodiversity.

Local Planning Policy Context

East Riding of Yorkshire Council planning policy

6.9.8 Policy ENV4 (International, National and Local Sites of Importance for Biodiversity) of the ERYLP (East Riding of Yorkshire Council, 2025) sets out that proposals emitting air pollutants must rule out adverse effects on the integrity of international (habitats) sites and avoid effects to national sites. Policy ENV6 (Managing environmental hazards) supports development where opportunities are identified to improve air quality or mitigate a development's air pollution impact, such as through traffic and travel management, and green infrastructure provision and enhancement. Policy EC5 (Supporting the renewable and low carbon energy sector) sets out that developments and their associated infrastructure should be acceptable in terms of local amenity including air quality.

North Lincolnshire Council planning policy

6.9.9 Policy DS1 (General Requirements) of the NLLP (North Lincolnshire Council, 2003) sets out that no pollution of air which poses a danger or a detrimental effect on the environment should result from new development.

Bassetlaw District Council planning policy

6.9.10 Policy 46 (Protecting Amenity) of the BLP (Bassetlaw Local Plan, 2024) sets out that proposals are expected to mitigate air quality impacts to an appropriate standard. Policy ST48 (Reducing Carbon Emissions, Climate Change Mitigation and Adaptation) aims to address issues of climate change mitigation and adaptation by ensuring there are no unacceptable adverse impacts on local air quality.

Assessment Conclusions

6.9.11 **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** provides an assessment of the likely effects on air quality that could result from the construction of the Project. An assessment of construction dust impacts on local amenity and ecological receptors has also been undertaken and is included in

Application Document 6.15.A2 Environmental Statement Appendix 15.2 Construction Dust Methodology and Assessment.

6.9.12 As confirmed in **Application Document 6.5.A2 Environmental Statement Appendix 5.2 Scoping Opinion**, operational generator emissions, operational and maintenance vehicle emissions, and decommissioning impacts were scoped out of the air quality assessment.

6.9.13 **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** concludes that during construction the effects on air quality from vehicle emissions are negligible and therefore not significant. The assessment also concludes that the effects on air quality from construction plant and equipment emissions, including Non-Road Mobile Machinery will not be significant. The construction dust assessment concludes that the effects of construction dust for human and ecological receptors would not be significant.

6.9.14 These conclusions assume the design mitigation and management measures set out in **Application Document 7.2 Outline Code of Construction Practice**, **Application Document 7.3 Register of Environmental Actions and Commitments**, and **Application Document 7.4 Outline Construction Traffic Management Plan** are implemented. Implementation and compliance with these documents is secured by **Application Document 3.1 Draft Development Consent Order**.

Appraisal

6.9.15 In accordance with NPS EN-1 paragraphs 5.2.8 and 5.2.9, **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** provides an assessment of the likely effects on air quality that would result from the Project and considers the baseline conditions and the likely changes and effects to air quality levels during the construction phase. The assessment confirms there would not be a deterioration in air quality or substantial changes in air quality levels and therefore significant adverse effects on air quality are not anticipated as a result of the Project.

6.9.16 In accordance with NPS EN-1 paragraphs 5.7.5, 5.7.6 and 5.7.12, a construction dust assessment has been carried out and confirms that following implementation of mitigation measures, effects on human and ecological receptors from all dust generating activities is predicted to be not significant.

6.9.17 In line with the mitigation hierarchy, the Project has sought in the first instance to avoid environmentally sensitive features as far as practicable throughout design development. Measures have been built into the design of the Project to avoid or reduce significant air quality effects that may otherwise be experienced during construction. These measures are secured in **Application Document 7.3 Register of Environmental Actions and Commitments**, with further control measures proposed during the construction phase also secured in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.4 Outline Construction Traffic Management Plan**. Following the implementation of mitigation measures set out in these documents, no significant effects are anticipated on sensitive air quality receptors in accordance with NPS EN-1 paragraph 5.2.13, ERYLP Policies ENV4, ENV6 and EC5, NLLP Policy DS1 and BLP Policies 46 and ST48.

6.9.18 NPS EN-1 requires the SoS to give substantial weight to the effects on air quality as part of decision making. It has been demonstrated that there will be no significant adverse effects upon air quality during the construction of the Project, with control

and mitigation measures in place to manage any impacts to acceptable levels. The Project therefore accords with national and local policies relevant to air quality.

6.10 Noise and Vibration

National Planning Policy Context

NPS EN-1

6.10.1 Paragraph 4.7.3 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) considers how good design in terms of siting and use of appropriate technologies can help mitigate adverse impacts such as noise.

6.10.2 Section 5.12 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out NPS policy in relation to noise and vibration.

6.10.3 Paragraph 5.12.1 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states that '*excessive noise can have wide-ranging impacts on the quality of human life and health such as annoyance, sleep disturbance, cardiovascular disease and mental ill-health. It can also have an impact on the environment and the use and enjoyment of areas of value such as quiet places and areas with high landscape quality*'.

6.10.4 Paragraph 5.12.4 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out that noise can also have an adverse impact on wildlife and biodiversity.

6.10.5 Paragraph 5.12.6 advises that where noise impacts are likely to arise, the applicant should include: a description of the noise generating aspects of the development; identification of noise-sensitive receptors and noise-sensitive areas that may be affected; the characteristics of the noise environment; a prediction of how the noise environment will change with the proposed development; an assessment of the effect of the predicted change; and details of proposed mitigation.

6.10.6 Paragraphs 5.12.13 to 5.12.16 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) set out requirements in terms of mitigation and set out that development must be undertaken in accordance with statutory requirements for noise. This includes having due regard to relevant sections of the Noise Policy Statement for England (Department for Environment, Food and Rural Affairs, 2010), the NPPF, and the government's associated planning guidance.

6.10.7 Paragraph 5.12.15 of NPS EN-1 outlines that a '*project should demonstrate good design through selection of the quietest or most acceptable cost effective plant available*'. This is in order to reduce and minimise the effects of noise at the design stage of a project.

6.10.8 Paragraph 5.12.17 of NPS EN-1 states '*The Secretary of State should not grant development consent unless they are satisfied that the proposals will meet the following aims, through the effective management and control of noise:*

- *Avoid significant adverse impacts on health and quality of life from noise;*
- *Mitigate and minimise other adverse impacts on health and quality of life from noise; and*

- *Where possible, contribute to improvements to health and quality of life through the effective management and control of noise.*'

NPS EN-5

6.10.9 NPS EN-5 (Department for Energy Security and Net Zero, 2025) paragraph 2.9.27 recognises that all high voltage transmission lines have the potential to generate noise under certain conditions.

6.10.10 Paragraph 2.9.28 states in terms of line noise, '*line noise is most commonly caused by corona noise when the conductor surface electric stress exceeds the inception level for corona discharge activity which is released as acoustic energy and radiates into the air as sound. Transmission line conductors are normally designed to operate below this threshold*'.

6.10.11 Paragraph 2.9.29 of NPS EN-5 (Department for Energy Security and Net Zero, 2025) states '*surface contamination on a conductor or accidental damage during transport or installation can cause local enhancement of electric stress and initiate discharge activity leading to the generation of additional noise*'.

6.10.12 Paragraph 2.9.30 acknowledges that the highest noise levels generally occur during rain.

6.10.13 NPS EN-5 (Department for Energy Security and Net Zero, 2025) paragraph 2.10.9 expects applicants to consider a range of mitigation measures for noise and vibration impacts including the positioning of lines, maintenance of conductors and selection of quieter plant.

6.10.14 NPS EN-5 (Department for Energy Security and Net Zero, 2025) paragraph 2.11.7 requires the SoS to ensure that appropriate mitigation has been considered and adopted, while paragraph 2.11.8 states '[…] *noise from overhead lines is unlikely to lead to the Secretary of State refusing an application, but it may need to consider the use of appropriate requirements in the DCO to ensure noise is minimised as far as is practicable*'.

NPPF and PPG

6.10.15 Policy P3 of the NPPF (Ministry of Housing, Communities and Local Government, 2026) states proposals should '*provide healthy living conditions* […] *in terms of* […] *noise*'. It also sets out that development proposals should not give rise to, or contribute to unacceptable levels of noise.

6.10.16 The PPG: Noise (Ministry of Housing, Communities and Local Government, 2019) Paragraph: 006 Reference ID: 30-006-20190722 sets out that consideration should be given to factors such as the cumulative impact of more than one source of noise, the effect of noise on wildlife and external amenity space.

Local Planning Policy Context

East Riding of Yorkshire Council planning policy

6.10.17 Policy ENV6 (Managing environmental hazards) of the ERYLP (East Riding of Yorkshire Council, 2025) requires environmental hazards to be managed to ensure that development does not result in unacceptable consequences to its users, the wider community, and the environment, including noise. Policy EC5 (Supporting the

renewable and low carbon energy sector) sets out that developments and their associated infrastructure should be acceptable in terms of local amenity including noise and vibration.

North Lincolnshire Council planning policy

6.10.18 Policy DS1 (General Requirements) of the NLLP (North Lincolnshire Council, 2003) sets out that development should not lead to unacceptable loss of amenity to neighbouring land uses in terms of noise or other terms of nuisance.

Bassetlaw District Council planning policy

6.10.19 Policy 46 (Protecting Amenity) of the BLP (Bassetlaw Local Plan, 2024) sets out that proposals are expected to mitigate noise and vibration impacts to an appropriate standard.

Assessment Conclusions

6.10.20 **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** presents an assessment of the likely significant noise and vibration effects that could arise from the Project. The assessment includes the potential temporary impacts from noise and vibration during the construction stage, including construction vibration on people and buildings, and construction traffic noise and vibration. The assessment also specifically considers operational noise from the proposed overhead line at the crossing of the River Ouse and operational noise from the small realignment of the existing ZDA route which has the potential to bring the line slightly closer to receptors. Other operational noise and operational vibration, maintenance, and decommissioning were scoped out of the assessment.

Construction noise

6.10.21 The construction noise assessment is based on the construction noise data presented in **Application Document 6.16.A3 Environmental Statement Appendix 16.3 Construction Noise and Vibration Data**. The assessment considers the worst-case task for each applicable activity, including during weekday and Saturday 'daytime' working periods and weekend, evening and bank holiday daytime working periods.

6.10.22 The assessment concludes that residual adverse effects from construction noise upon sensitive receptors can be avoided through the implementation of Best Practicable Means (BPM). As set out in **Application Document 7.7 Outline Noise and Vibration Management Plan (NVMP)** and committed to in **Application Document 7.3 Register of Environmental Actions and Commitments**, the Main Works Contractor(s) will conduct further detailed construction noise and vibration assessments based on their specific construction methodologies. The Main Works Contractor(s) will then identify the required site-specific mitigation measures and update the Outline NVMP into an NVMP accordingly to ensure the measures are implemented.

6.10.23 An assessment of construction traffic noise is provided in **Application Document 6.16.A4 Environmental Statement Appendix 16.4 Construction Traffic Noise and Vibration Assessment**. The assessment has considered construction traffic on the public highway and on construction access tracks. The assessment of construction traffic on construction access tracks concludes that construction traffic noise would

be below the Significant Observed Adverse Effect Level (SOAEL) at all nearby NSRs (Noise and Vibration Sensitive Receptor) for all construction access tracks. As such, significant adverse effects from noise from construction traffic on the construction access tracks are not expected. The assessment of construction traffic noise on the public highway also concludes that no significant effects are anticipated as a result of the construction of the Project.

6.10.24 **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** also concludes that with the implementation of appropriate mitigation measures, construction noise effects on PRoW users, canal users and horses would not be expected to be significant.

Construction vibration

6.10.25 The construction vibration assessment is based on the construction vibration data presented in **Application Document 6.16.A3 Environmental Statement Appendix 16.3 Construction Noise and Vibration Data**. The assessment indicates that there are potential significant adverse effects from construction activities, without mitigation, at seven residential NSRs. These are due to activities including pylon construction, construction of access tracks/highways and potential underground cabling.

6.10.26 No buildings or structures have been identified where there is potential for damage from vibratory construction activities. This will be reviewed by the contractor(s) as part of their detailed assessments, and specific mitigation measures would be identified to reduce any potential effects.

6.10.27 If construction vibration levels are predicted to approach or exceed the threshold for potential damage, even with mitigation (although this is considered unlikely), pre- and post-condition surveys would be undertaken of the building or structure, and any damage deemed to be caused by the works would be rectified.

6.10.28 Construction vibration levels on residential receptors are expected to be readily mitigatable to below the threshold for potential significant effects with control and management measures, as part of the implementation of BPM. As such, with control and management measures incorporated into the works, no residual significant adverse effects are expected from construction vibration. An assessment of construction traffic vibration is provided in **Application Document 6.16.A4 Environmental Statement Appendix 16.4 Construction Traffic Noise and Vibration Assessment**. The assessment indicates that significant adverse effects from construction traffic vibration are not expected. **Application Document 7.4 Outline Construction Traffic Management Plan** includes for pre- and post-condition surveys of the existing highway network that are proposed to be used as abnormal indivisible load and heavy goods vehicle routes. The results of these pre-condition surveys will be shared with the local highway authority prior to works commencing, including pre-commencement works relating to the highway.

Operational noise

6.10.29 A ‘triple Araucaria’ conductor system proposed for the majority of the route is low noise, and therefore significant adverse effects from operational noise are not expected. There are two locations where triple Araucaria is not proposed or cannot be committed to at this stage due to potential operational constraints:

- The River Ouse between proposed pylons 4AF76 and 4AF80; and

- The realignment of the existing ZDA route between Ealand and west of Keadby (between existing pylons ZDA116 and ZDA123)

6.10.30 As a conductor type has not been fixed for the River Ouse crossing, the assessment has been based on the worst-case likely conductor with regard to noise, namely 'twin Warwick'.

6.10.31 In terms of the River Ouse crossing, potential adverse effects are only anticipated within approximately 52 m of the proposed overhead line centre line. The nearest NSR is located approximately 80 m to the west of the proposed overhead line centre (between pylons 4AF79 and 4AF80 at Ousefleet and as such significant adverse effects are not anticipated.

6.10.32 Taking account of potential flexibility within the LoD, the centre of the pylon could move 30 m either side of the centre line subject to topography and local conditions. At a worst-case at the extreme of the LoD, the nearest NSR would therefore be approximately 50 m from the centre line. This falls just within the distance for potential adverse effects, requiring a BS 4142 assessment. The assessment concludes that operational noise during dry conditions at the nearest NSR during daytime and night-time periods is negligible to low. For wet conditions the change in ambient level is approximately 1 dB during daytime and night-time periods, which, even considering the worst-case potential conductor type, does not result in a significant effect.

6.10.33 In terms of the realignment of the existing ZDA overhead line, the assessment concludes that potential adverse effects are only expected within approximately 33 m of the overhead line centre line. The nearest NSR is located at a distance of approximately 200 m from the centre line of the proposed realignment of the overhead line and as such no adverse effects from operational noise are anticipated.

6.10.34 Taking account of potential flexibility within the LoD, the centre of the pylon could move approximately 20 m either side of the centre line subject to topography and local conditions. At a worst-case at the extreme of the LoD, the nearest NSR would therefore be approximately 180 m from the centreline which would not result in any significant adverse effects.

Appraisal

6.10.35 In accordance with paragraph 5.12.6, an assessment of the potential noise impacts of the Project are set out in **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration**. The assessment concludes that there will be no significant effects on NSR as a result of the construction and operation of the Project in accordance with paragraphs 5.12.1 and 5.12.4 of NPS EN-1.

6.10.36 The Project has been designed following the mitigation hierarchy as far as practicable with the route alignment being sited and designed to avoid NSRs including settlements and residential areas, passing predominantly through rural areas, with the majority of nearby NSRs comprising isolated dwellings and small settlements, in accordance with NPS EN-1 paragraph 4.7.3 and NPS EN-5 2.10.9. Triple Araucaria conductors (or alternative technology that performs the same or better in relation to noise) is proposed along the majority of the route (with the exception potentially of the River Ouse crossing and realignment of the existing ZDA route between Ealand and west of Keadby where flexibility is required). This is the best design for reducing the effects of line crackle (corona discharge) and would reduce the generation of noise from the proposed overhead line during operation,

demonstrating selection of quieter plant in accordance with NPS EN-1 paragraph 5.12.15 and NPS EN-5 paragraphs 2.9.28 and 2.10.9.

6.10.37 With the implementation of design and control measures, potential significant adverse effects for NSRs during the construction and operation of the Project can be minimised and avoided. While potential adverse effects are anticipated at seven residential NSRs due to activities including pylon construction, construction of access tracks/highways and potential underground cabling, these are considered to be acceptable following the implementation of BPM and no significant effects are anticipated in accordance with the requirements of NPS EN-1 paragraph 5.12.17. Construction mitigation measures include:

- Construction working will be undertaken within the agreed working hours set out within the DCO.
- Any activity carried out or equipment located within a construction compound that may produce a noticeable nuisance, including but not limited to dust, noise, vibration and lighting, will be located away from sensitive receptors such as residential properties or ecological sites where practicable.
- Members of the community and local businesses will be kept informed regularly of the works through active community liaison.
- The CoCP shall include measures to manage dust, waste, water, noise, vibration and soil during construction. The contractor(s) shall undertake site inspections to check conformance to the Management Plans.
- A suitably experienced Environmental Manager will be appointed for the duration of the construction phase.

6.10.38 Any noise and vibration effects associated with the construction phase of the Project will be temporary, with no lasting permanent residual effects once the construction phase is complete.

6.10.39 Further measures relevant to the control and management of impacts during construction of the Project are included in **Application Document 7.2 Outline Code of Construction Practice**, **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.7 Outline Noise and Vibration Management Plan**. Detailed plans which must be substantially in accordance with these outline management plans will be brought forward post consent as secured by Requirements in **Application Document 3.1 Draft Development Consent Order**.

6.10.40 Following implementation of these mitigation measures, the Project is considered to be in accordance with paragraphs 5.12.13 to 5.12.16 of NPS EN-1, paragraph 2.5.2 of NPS EN-3 and paragraph 2.11.7 of NPS EN-5, the NPPF, PPG and relevant local policies relating to the control of noise and vibration. Overall, the Project is considered acceptable in terms of noise and vibration impacts and in accordance with relevant national and local policies.

6.11 Socio-Economics

6.11.1 This section covers socio-economic impacts including potential impacts on employment and the economy, communities, businesses, recreation and tourism receptors. Impacts on local residents are not covered in this section, as these are discussed in relation to amenity, in section 6.12 of this Planning Statement.

National Planning Policy Context

NPS EN-1

6.11.2 Paragraph 5.11.30 of NPS EN-1 recognises PRoWs, National Trails and other rights of access to land as important recreational facilities. It states *'The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve or create new access.*'

6.11.3 Section 5.13 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out the socio-economic policy considerations for NSIPs. Paragraph 5.13.2 requires applicants to undertake an assessment of socio-economic impacts at local or regional levels as part of the ES.

6.11.4 NPS EN-1 paragraph 5.13.4 sets out the scope of matters which the applicant's socio-economic assessment within the ES should consider during different phases of the Project, stating that it may include details on *'the creation of jobs and training opportunities…; the contribution to the development of low-carbon industries…; any indirect beneficial impacts for the region…; effects (positive and negative) on tourism and other users of the area…; the impact of a changing influx of workers…'*

6.11.5 Paragraph 5.13.5 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) requires applicants to describe the existing socio-economic conditions in the areas surrounding a proposed development and how the socio-economic impacts of development correlate with local policy. Paragraph 5.13.6 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) explains that socio-economic impacts may be linked to other impacts, for example the visual impact of development, which may impact on tourism and local business. Paragraph 5.13.10 states *'the Secretary of State may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS)'.*

6.11.6 Paragraphs 5.13.8 and 5.13.11 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) set out that the decision maker should consider whether mitigation measures are necessary to address potential adverse socio-economic impacts, and any legacy benefits that may arise.

6.11.7 Paragraph 5.3.12 adds that '*the Secretary of State may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities* […]'.

NPPF and PPG

6.11.8 Section 7 of the NPPF, *'Building a strong and competitive economy'* sets out in Policy E2 that substantial weight should be given to the economic benefits of commercial developments which allow businesses to invest, expand and/or adapt. Policy TR of the NPPF requires development proposals to protect and enhance the network of public rights of way. Key advice on open space, sports and recreation facilities, PRoWs and Local Green Spaces is also provided in the PPG: Open space, sports and recreation, public rights of way and local green space (Ministry of Housing, Communities and Local Government, 2014). Given the policies and guidance are similar to those set out in NPS EN-1 above, they are not repeated here.

Local Planning Policy Context

East Riding of Yorkshire Council planning policy

6.11.9 Policy EC1 (Supporting the growth and diversification of the East Riding economy) of the ERYLP (East Riding of Yorkshire Council, 2025) supports development that contributes to the decarbonisation of the local economy and strengthens the East Riding of Yorkshire Council's key employment sectors and clusters including renewable and low carbon energy. Policy S8 (Connecting People and Places) seeks to enhance and/or protect PRoWs.

North Lincolnshire Council planning policy

6.11.10 Policy CS25 (Promoting Sustainable Transport) of the NLCS (North Lincolnshire Council, 2011) promotes the continuation and improvement of the PRoW network within North Lincolnshire.

Bassetlaw District Council planning policy

6.11.11 Policy ST5 (Provision of Land for Employment Development) of the BLP (Bassetlaw Local Plan, 2024) sets out the Council's strategy for economic prosperity and inward investment to support job growth, upskilling of residents and economic growth.

Neighbourhood planning policy

6.11.12 The following Neighbourhood Plans and policies are relevant to the Project in terms of socio-economics:

- HUGS Neighbourhood Plan (2018) (Nether Headon, Upton, Grove and Stokeham Parish, 2018) Policy 8: Enhancing our Public Rights of Way;
- Treswell with Cottam Neighbourhood Plan (2024) (Bassetlaw District Council, 2023) Policy 7: Protecting Existing Community Facilities; and
- Sturton Ward Neighbourhood Plan (2021) (Sturton Ward Planning Group, 2021) Policy 11: Community facilities.

Assessment Conclusions

Overview

6.11.13 **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** describes potential impacts on tourism, employment and local businesses in sections 17.7 and 17.9. This includes an assessment of impacts on the integrity of tourist attractions and business premises, the impact on jobs in the supply chain during construction and the impact on the availability of local accommodation facilities during construction.

6.11.14 The Project has sought to avoid or minimise socio-economic adverse effects and maximise benefits through design. Embedded mitigation measures include:

- Sensitive routeing and siting of infrastructure and temporary works to avoid or reduce impacts on communities, businesses, recreation and tourism receptors; and

- Limiting construction activities to defined daytime core working hours, reducing general disruption to nearby communities, local businesses, and tourism/recreation receptors.

6.11.15 In addition to the above, the Project commits to construction mitigation to minimise potential socio-economic impacts, as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, **Application Document 7.4 Outline Construction Traffic Management Plan**, **Application Document 7.6 Outline Public Rights of Way Management Plan** and **Application Document 7.2 Outline Code of Construction Practice**. These include (but are not limited to):

- Maintaining access to community facilities, businesses, tourism assets and recreational areas where practicable when they fall within the Order Limits. Where closures are unavoidable, appropriate temporary access arrangements will be provided, including diversions with advance notice signage, ensuring that affected users are clearly informed of changes before and throughout the construction period.

Construction

6.11.16 Following the implementation of embedded, control and management and additional mitigation measures, **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** concludes that the Project would have a beneficial effect on construction employment within a 60-minute Drive Time Area of the Project, during the construction period, which is not significant. This is because the Project will support, on average, 284 total net jobs per annum during the construction period. Of these, 57 jobs per annum are expected to be occupied by residents within the 60-minute Drive Time Area of the Project. **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** concludes that the employment of construction workers required within the 60-minute Drive Time Area would account for less than 0.04% of the total construction workforce, therefore there would be a negligible impact on construction labour supply within the 60-minute Drive Time Area.

6.11.17 **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** estimates that, taking into account the average gross value added (GVA) per construction worker being £93,336 in Yorkshire and the Humber, and £121,351 in the East Midlands (Office for National Statistics, 2023), the construction of the Project will contribute approximately £39.9 million to the national economy, of which £8 million would likely be within the 60-minute Drive Time Area. This is a beneficial effect that is not significant.

6.11.18 In terms of impacts to visitor and tourist accommodation, it is concluded that considering the worst case scenario existing seasonal demand and typical occupancy (14% of local hotels and bed and breakfasts within the 60-minute Drive Time Area available (2025 levels)), the peak non-local workforce could be accommodated within existing provision within a 60-minute Drive Time Area. In this scenario, there is still approximately 11% spare capacity in hotel, bed and breakfast and inns accommodation within a 60-minute Drive Time Area, which results in a negligible effect.

6.11.19 Following the implementation of the proposed embedded, control and management measures, no significant adverse impacts are expected on community facilities including local schools, churches, and village halls, tourism receptors and recreation receptors during the construction of the Project.

6.11.20 During construction, there is the potential for works to impact on access to residential properties. Mitigation measures set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, **Application Document 7.4 Outline Construction Traffic Management Plan**, **Application Document 7.6 Outline Public Rights of Way Management Plan** and **Application Document 7.2 Outline Code of Construction Practice** will ensure that the majority of these impacts are not significant. However, there are five residential receptors along Cornley Road (PAR 77) that will experience significant adverse effects, due to the requirement for highway widening and bellmouth construction and removal activities. The properties are located in a rural setting where access to services, employment, healthcare, and other daily necessities is almost entirely dependent on private vehicle use. There is no meaningful public transport provision in this location, and active travel alternatives are not a realistic substitute given the distances involved and the rural road environment. It is anticipated that the highway widening and bellmouth works on Cornley Road will amount to 244 days of closure exposure across two separate closures. All works will be undertaken outside peak hours, Monday to Friday from 10:00 to 15:00. As Cornley Road has only the single point of connection to the wider network, these closures would sever access along the shared route, cutting off residential receptors for the duration of each closure, regardless of how far along the lane their own frontage is located. The narrow carriageway and constrained verge limits mitigation opportunities on this road though measures are proposed in **Application Document 7.4 Outline Construction Traffic Management Plan** including working hours restriction to provide morning, evening and weekend access, advance notice of works and a community liaison officer. Additionally emergency vehicle access and pedestrian access will be maintained at all times, as secured through the relevant commitment in **Application Document 7.3 Register of Environmental Actions and Commitments**.

6.11.21 Significant adverse effects are also anticipated on some businesses due to road closures. Misterton Christian Centre is a campsite business, also situated along Cornley Road, and will experience significant adverse effects due to the road closure of Cornley Road as set out above.

6.11.22 Beetroot UK which is a farm business, and Sunflower Lodge which is a holiday home, both located along Cattle Road (PAR 80) will also experience significant adverse effects due to three separate closures of Cattle Road to facilitate NGED undergrounding works and bellmouth construction and removal activities. The separate road closures would amount to 108 days of closure. As Cattle Road is the only point of connection to the wider network, both closures would sever access along the shared route, cutting off the businesses for the duration of each closure. Mitigation is proposed in **Application Document 7.4 Outline Construction Traffic Management Plan** such as programming of works around cropping and harvesting activity, flexibility for time-critical agricultural operations, and coordination of delivery windows, and the working hours restriction provides morning, evening, and weekend vehicle access. However, in a worst-case scenario the businesses may be unable to receive or dispatch produce during the hours of 10:00 to 15:00 and therefore this results in significant adverse effects.

6.11.23 Newlands Equestrian centre and Epworth Fields Holiday Park are both situated along Newlands Lane (PAR 64), and they will also experience significant adverse effects due to the closure of Newlands Lane for highway widening and bellmouth construction and removal activities. This would result in two separate closures totalling 44 days, with works being carried out outside of peak times. Mitigation is proposed as set out in **Application Document 7.4 Outline Construction Traffic**

Management Plan, including a working hours restriction providing morning, evening and weekend vehicle access, and measures such as customer access signage, coordination of deliveries, and staff access arrangements. Emergency vehicle and pedestrian access will be maintained at all times, as secured through the relevant commitment in **Application Document 7.3 Register of Environmental Actions and Commitments**. However, in a worst-case scenario customers may be unable to access the equestrian centre and holiday park between 10:00 to 15:00.

6.11.24 **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** anticipates that there would be no other significant effects on the majority of businesses, recreation (including PRoW) or tourism receptors assessed during construction, except for impacts on recreational aerodromes, which are addressed in section 6.15 of this Planning Statement.

6.11.25 To summarise, **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** concludes that based on a worst case assessment three out of the eight unlicensed aerodromes located within 500 m of the Project (Forwood Farm Airfield, Headon Airfield, and Darlton Gliding Club) are anticipated to experience significant adverse impacts on commercial operations and recreational use due to the construction of the proposed overhead line leading to cessation or hinderance of activities at Headon Airfield and Darlton Gliding Club, and may lead to the full cessation of operations at Forwood Farm Airfield.

Operation

6.11.26 Following completion of construction activities, and during the operation and maintenance of the Project, **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** anticipates that there would be no significant effects on any private, community, recreation (including PRoW) or tourism receptors.

Appraisal

6.11.27 **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** provides an assessment of the Project's impacts on tourism and local businesses in sections 17.7 and 17.9. This includes an assessment of impacts on the integrity of tourist attractions and business premises, the impact on jobs in the supply chain during construction and the impact of a changing influx of construction workers on the availability of local accommodation facilities in accordance with paragraphs 5.13.2 to 5.13.5 of NPS EN-1.

6.11.28 Embedded, control and management and additional mitigation measures have been incorporated into the design of the Project to minimise and avoid, where possible, socio-economic effects. These are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, **Application Document 7.4 Outline Construction Traffic Management Plan**, **Application Document 7.6 Outline Public Rights of Way Management Plan** and **Application Document 7.2 Outline Code of Construction Practice**, all of which will be secured by **Application Document 3.1 Draft Development Consent Order**. Prior to the commencement of construction works, National Grid and the Main Works Contractor(s) will produce and comply with a Skills, Supply Chain, and Employment Plan, as secured through a commitment within **Application Document 7.3 Register of Environmental Actions and Commitments**.

6.11.29 The Project would result in beneficial effects on employment and GVA during the construction period, amounting to, on average, 284 total net jobs per annum during the construction period, of which 57 jobs per annum will be expected to be taken up by residents in the 60-minute Drive Time Area of the Project. The construction of the Project will contribute approximately £39.9 million to the national economy, of which £8 million would likely be within the 60-minute Drive Time Area. It is concluded that considering the worst case scenario existing seasonal demand and typical occupancy (2025 levels), the peak non-local workforce could be accommodated within existing provision within a 60-minute Drive Time Area.

6.11.30 Following the implementation of the proposed embedded, control and management measures, no significant adverse impacts are expected on community facilities including local schools, churches, and village halls, and the majority of businesses, tourism receptors and recreation receptors during the construction of the Project.

6.11.31 During construction, there are five groups of residential receptors, and five businesses (Misterton Christian Centre, Beetroot UK, Sunflower Lodge, Newlands Equestrian and Epworth Fields Holiday Park) that will experience residual significant adverse effects as a result of road closures necessary for the construction of the Project. Mitigation is proposed for all road closures as set out in **Application Document 7.4 Outline Construction Traffic Management Plan**, including a working hours restriction providing morning, evening and weekend vehicle access, and measures specific to each business. Emergency vehicle and pedestrian access will be maintained at all times, as secured through the relevant commitment in **Application Document 7.3 Register of Environmental Actions and Commitments**. These impacts would be temporary, and access would return to normal following the completion of the construction works at each road.

6.11.32 Significant effects are also reported in relation to three aerodromes, as set out in section 6.15 of this Planning Statement. Although the construction of the Project would result in significant adverse impacts on three unlicensed aerodromes, two of these can continue their use, with only one airfield needing to permanently cease operations, based on a worst case assessment. The affected airfields are currently only used for recreational activities and are not used currently for military or defence operations.

6.11.33 **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** concludes that following completion of the construction period, there would be no significant adverse effects in relation to businesses, communities, tourism or recreational receptors during the operation and maintenance of the Project.

6.11.34 Following implementation of the mitigation measures proposed, the Project is in accordance with paragraphs 5.13.1 to 5.13.11, 5.13.12 and 5.11.30 of NPS EN-1, the NPPF, PPG and relevant local policies relating to socio-economics.

6.12 Health and Wellbeing

National Planning Policy Context

NPS EN-1

6.12.1 Section 4.4 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out policy relating to energy NSIPs. Paragraph 4.4.1 acknowledges that energy infrastructure has the potential to impact on the health and well-being of the population. Paragraph 4.4.2 lists the potential direct impacts to health as follows:

- '*Increased traffic;*
- *Air or water pollution;*
- *Dust;*
- *Odour;*
- *Hazardous waste and substances;*
- *Noise;*
- *Exposure to radiation; and*
- *Increases in pests'.*

6.12.2 Paragraph 4.4.4 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states '*where the proposed project has an effect on humans, the ES should identify any potential adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate*'.

6.12.3 Paragraph 4.4.5 goes on to add that the applicant should consider the cumulative impacts on health in the ES where appropriate.

6.12.4 It is recognised in paragraph 4.4.7 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) that *'aspects of energy infrastructure most likely to have a significantly detrimental impact on health are subject to separate regulation (for example air pollution) which will constitute effective mitigation of them, therefore it is unlikely that health concerns will either by themselves constitute a reason to refuse consent or require specific mitigation under the Planning Act 2008'.*

6.12.5 However, paragraph 4.4.8 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) follows that not all potential sources of health impacts will be mitigated in this way and the SoS may want to take account of health concerns when setting requirements relating to a range of impacts such as noise.

6.12.6 Paragraph 5.12.17 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) directs the SoS to refuse consent unless satisfied that the proposals meet the following aims, through the effective management and control of noise:

- '*Avoid significant adverse impacts on health and quality of life from noise;*
- Mitigate and minimise other adverse impacts on health and quality of life from noise; and
- Where possib*le, contribute to improvements to health and quality of life through the effective management and control of noise'*.

NPS EN-5

6.12.7 NPS EN-5 (Department for Energy Security and Net Zero, 2025) paragraph 2.10.11 requires that the applicant considers the following factors *'… that optimal phasing of high voltage overhead power lines is introduced wherever possible and practicable in accordance with the Code of Practice to minimise EMFs; and any new advice emerging from the Department of Health and Social Scare relating to government policy for EMF exposure guidelines'*.

Local Planning Policy Context

East Riding of Yorkshire Council planning policy

6.12.8 Policy C2 (Supporting community services and facilities) of the ERYLP (East Riding of Yorkshire Council, 2025) seeks to retain existing services and facilities including, health and education facilities.

Bassetlaw District Council planning policy

6.12.9 Policy ST42 (Promoting Healthy, Active Lifestyles) of the BLP (Bassetlaw District Council, 2024) aims to create an environment which supports healthy, active, inclusive and safe communities.

Neighbourhood planning policy

6.12.10 The following Neighbourhood Plans and policies are relevant to the Project in terms of health and wellbeing:

- HUGS Neighbourhood Plan (2018) (Nether Headon, Upton, Grove and Stokeham Parish, 2018) Policy 5: Existing Community Facilities, Policy 7: Local Green Space, and Policy 8: Enhancing our Public Rights of Way;
- Rampton and Woodbeck Neighbourhood Plan (2021) (Bassetlaw District Council, 2021) Policy 7: Local Green Space and Policy 9: The Protection of Local Amenities; and
- Walkeringham Neighbourhood Plan (2021) (Walkeringham Neighbourhood Plan Steering Group, 2021) Policy 5: Designation of Local Green Spaces and Policy 7: Enhancing the provision of community facilities.

Assessment Conclusions

6.12.11 **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing** provides an assessment of the likely effects of the construction, operation and maintenance of the Project on health and wellbeing. The assessment considers the impacts of the Project on various determinants of health and wellbeing and draws upon the assessments of the relevant topic chapters contained in the ES.

6.12.12 Potential impacts in relation to human health were considered in the early stages of siting, and design and embedded measures have been intrinsic to the design of the Project to reduce and where possible avoid impacts on human health. Embedded mitigation measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, which is secured by **Application Document 3.1 Draft Development Consent Order**, and include but are not limited to:

- Sensitive routeing and siting of infrastructure and temporary works to avoid or reduce impacts on health and wellbeing receptors;
- Where possible the Project has been designed to be parallel or close parallel with the existing overhead lines to reduce visual impacts;
- Limiting construction activities to defined daytime core working hours, reducing general disruption to nearby communities, local businesses, and tourism/recreation receptors; and
- Project design in accordance with National Grid design standards and compliant with guidelines and policies relating to EMFs, including the International Commission of Non-Ionizing Radiation Protection guidelines.

6.12.13 In addition to the above, the Project commits to construction mitigation to minimise potential impacts on human health, as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, **Application Document 7.4 Outline Construction Traffic Management Plan**, **Application Document 7.6 Outline Public Rights of Way Management Plan** and **Application Document 7.2 Outline Code of Construction Practice**. These include (but are not limited to):

- Maintaining access to community facilities, businesses, tourism assets and recreational areas where practicable when they fall within the Order Limits;
- Implementing measures to manage dust, waste, water, noise, vibration and soil during construction with site inspections being carried out in accordance with the relevant management plans;
- Locating activities or equipment within a construction compound that may produce a noticeable nuisance, including but not limited to dust, noise, vibration and lighting, away from sensitive receptors such as residential properties where practicable; and
- Informing members of the community and local businesses through active community liaison, including notification of noisy activities, heavy traffic periods, and start and end dates of key phasing. A free telephone Project helpline will be provided which members of the public can use to raise any concerns or complaints about the Project. All construction-related complaints, responses, and actions will be logged.

6.12.14 Following the implementation of the proposed embedded, management and control measures, **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing** concludes that during the construction, operation and maintenance of the Project, there would be no significant adverse effects in relation to access to health and social care services. This includes impacts of increased demand and increased traffic and severance.

6.12.15 It is concluded that overall there would be a minor beneficial human health effect in relation to employment and income, and education and training during construction. This is due to the requirement for construction workers from the local area and the commitment made by National Grid to preparing an Employment, Skills and Education Strategy before the commencement of works. It is acknowledged that **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** concludes that the Project would result in significant effects on three recreational aerodromes, however these are not anticipated to have significant health and wellbeing effects at the population level.

6.12.16 **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing** concludes that no significant adverse effects are anticipated in relation to transport modes, access and connections which includes consideration of accessibility and safety of PRoWs, active travel networks and the road network.

6.12.17 **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing** considers the assessment of potential air quality effects set out in **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** and assessment of construction dust (**Application Document 6.15.A2 Environmental Statement Appendix 15.2 Construction Dust Methodology and Assessment**), and the assessment of potential noise and vibration effects in **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration**. **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing** confirms that, following the implementation of measures set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, the likely effect on health and wellbeing arising from increased exposure to dust and particulate matter emissions, and from noise and vibration impacts during the construction phase are not significant.

6.12.18 Water quality is also assessed, and taking into consideration the assessment in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment** and measures set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, it is concluded in **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing** that the health and wellbeing effects of changes to water quality associated with the Project are not significant.

6.12.19 Taking into consideration the assessment of effects in **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism**, **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing** concludes that the likely effect on health and wellbeing arising from open space, leisure, and play effects due to impacts on amenity, access, and provision during the construction, operation and maintenance of the Project are not significant.

6.12.20 **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing** anticipates that the effect of climate change mitigation and adaptation associated with the Project is not significant on the general population and vulnerable populations, given the one-off nature of the embedded CO2 emissions which relate to construction alone and the temporary nature of the workforce exposure risk. In addition, over its lifetime, the Project will provide a key contribution to the UK supporting its net zero policy and the transition away from fossil fuels. Although there are emissions associated with the operation of the Project, it is anticipated that the potential benefits of improving efficiency and enabling greater renewable energy connections from the Project outweighs the associated emissions.

6.12.21 Finally, there would be no significant effects on health and wellbeing in relation to community identity, culture, resilience, and influence resulting from the impacts set out above during the construction, operation, and maintenance phases of the Project.

6.12.22 **Application Document 6.21 Environmental Statement Chapter 21 Inter-Project Cumulative Effects** provides an assessment of whether the Project and other relevant developments have cumulative effects on human health. It concludes that there would be no significant cumulative health and wellbeing effects.

Appraisal

6.12.23 In accordance with paragraph 4.4.4 of NPS EN-1, an assessment of effects on each element of the Project has been carried out which identifies potential adverse health impacts as set out in **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing**.

6.12.24 **Application Document 6.21 Environmental Statement Chapter 21 Inter-Project Cumulative Effects** provides an assessment of whether the Project and other relevant developments have cumulative effects on human health. It concludes that there would be no significant cumulative health and wellbeing effects. Embedded, control and management measures are proposed to minimise potential impacts on human health, as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, **Application Document 7.4 Outline Construction Traffic Management Plan, Application Document 7.6 Outline Public Rights of Way Management Plan** and **Application Document 7.2 Outline Code of Construction Practice**, which will all be secured by **Application Document 3.1 Draft Development Consent Order**. The proposed measures are also set out in **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing**.

6.12.25 The assessment of effects on human health in **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing** looks at a wide range of potential impacts and groups of people including vulnerable groups and those with protected characteristics under the Equality Act 2010. The assessment also takes account of the assessments carried out in other ES chapters including noise, air quality, traffic and socio-economics impacts. This has resulted in the following being assessed in **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing**:

- Residents' access to healthcare and social services due to increased pressure on GP capacity and impacts on the accessibility of GPs;
- Local workers from increased employment and income for the construction workforce;
- Education and training levels locally due to upskilling and apprenticeships from the Project;
- PRoWs, access routes and recreational routes due to temporary closures or diversions;
- Local communities from a reduction in air quality due to dust and air pollutants associated with the construction of the Project;
- Local communities from construction noise and vibration;
- Amenity, access, and provision of open space, leisure space, and play space due to severance associated with the Project;
- Local and national climate change mitigation and adaptation from greenhouse gas emissions associated with the Project;
- Local communities from a reduction in water quality due to water pollution associated with the Project; and
- Local communities from the deterioration of community identity, culture, resilience, and influence.

6.12.26 **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing** concludes that following the implementation of embedded, control and management measures, there would be no significant adverse effects on human health as a result of the construction, operation and maintenance of the Project.

6.12.27 Therefore, the Project is in accordance with paragraphs 4.4.1 to 4.4.8 of NPS EN-1, paragraph 2.10.11 of NPS EN-5, the NPPF, PPG and relevant local policies relating to human health.

6.13 Climate Change

National Planning Policy Context

NPS EN-1

6.13.1 Section 4.10 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out climate change policy relating to energy NSIPs and how applicants and the Examining Authority should consider the effects of climate change when planning for and consenting new energy infrastructure. Paragraph 4.10.1 states that '*if new energy infrastructure is not sufficiently resilient against the possible impacts of climate change, it will not be able to satisfy the energy needs as outlined in Part 3 of this NPS*'.

6.13.2 Paragraph 4.10.5 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out that applicants should take reasonable steps to maximise the use of nature-based solutions alongside other conventional techniques when preparing measures to support climate change adaptation.

6.13.3 Paragraph 4.10.8 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) recognises that '*New energy infrastructure will typically need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. site flooding, limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires) impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure*'.

6.13.4 Paragraph 4.10.9 to 4.10.13 (Department for Energy Security and Net Zero, 2025) requires applicants to assess the impacts on and from their energy projects across a range of climate scenarios in line with relevant advice and guidance, and demonstrate that proposals have a high level of climate resilience built-in from the outset.

6.13.5 Paragraph 4.10.15 of NPS EN-1 sets out that the '*Secretary of State should be satisfied that there are not features of the design of new energy infrastructure critical to its operation which may be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections.*'

NPS EN-5

6.13.6 Paragraph 2.3.2 of NPS EN-5 (Department for Energy Security and Net Zero, 2025) requires applicants to set out '*to what extent the proposed development is expected to be vulnerable, and, as appropriate, how it has been designed to be resilient to:*

- *Flooding, particularly for substations that are vital to the network; and especially in light of changes to groundwater levels resulting from climate change;*
- *The effects of wind and storms on overhead lines;*
- *Higher average temperatures leading to increased transmission losses;*
- *Earth movement or subsidence caused by flooding or drought (for underground cables); and*
- *Coastal erosion – for the landfall of offshore transmission cables and their associated substations in the inshore and coastal locations respectively*'.

Greenhouse gas emissions

NPS EN-1

6.13.7 Section 5.3 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out greenhouse gas (GHG) emissions policy relating to NSIPs. Paragraph 5.3.4 states that '*all proposals for energy infrastructure projects should include a GHG assessment as part of their ES*'; and in addition, that this should include a whole life GHG assessment.

6.13.8 Paragraph 5.3.7 requires steps are taken to minimise and offset emissions to be set out in a GHG Reduction Strategy secured under the Development Consent Order.

6.13.9 Paragraph 5.3.8 sets out that the SoS '*must be satisfied that the applicant has as far as possible assessed the GHG emissions of all stages of the development*'.

6.13.10 Paragraph 5.3.9 also states that the SoS '*should be content that the applicant has taken all reasonable steps to reduce the GHG emissions of the construction and decommissioning stage of the development*'.

NPPF

6.13.11 Policy CC2 of the NPPF (Ministry of Housing, Communities and Local Government, 2026) sets out the criteria that development proposals should follow, where relevant, to contribute to climate change mitigation. Policy CC3 states '*Development proposals should take into account the current and potential impacts of climate change over the lifetime of the scheme*' and sets out the ways in which development should seek to minimise vulnerability to these impacts.

Marine Plans

East Inshore and East Offshore Marine Plans

6.13.12 Policy CC1 of the East Inshore and East Offshore Marine Plan requires proposals to take account of how they may be impacted by, and respond to, climate change over their lifetime. Policy CC2 requires greenhouse gases to be minimised as far as possible.

Local Planning Policy Context

East Riding of Yorkshire Council planning policy

6.13.13 Policy S2 (Addressing Climate Change) of the ERYLP (East Riding of Yorkshire Council, 2025) supports development proposals that reduce the generation of additional greenhouse gas emissions and incorporate adaptation measures to mitigate the expected impacts of climate change.

North Lincolnshire Council planning policy

6.13.14 Policy CS5 (Delivering Quality Design in North Lincolnshire) of the NLCS (North Lincolnshire Council, 2011) requires new development to incorporate the principles of sustainable development through the design process whilst mitigating against the impacts of climate change. Policy CS18 (Sustainable Resource and Climate Change) sets out the criteria that development should follow to utilise natural resources as efficiently and sustainably as possible.

Bassetlaw District Council planning policy

6.13.15 Policy ST48 (Reducing Carbon Emissions, Climate Change Mitigation and Adaptation) of the BLP (Bassetlaw Local Plan, 2024) sets out the criteria that development is required to meet to address issues of climate change mitigation and adaptation.

Neighbourhood planning policy

6.13.16 The following Neighbourhood Plans and policies are relevant to the Project in terms of climate change:

- Misterton Neighbourhood Plan (NP) (2024) (Misterton Parish Council, 2024) Policy 6R: Renewable Energy, Energy Efficiency and Low Carbon Technologies.

Assessment Conclusions

6.13.17 **Application Document 6.19 Environmental Statement Chapter 19 Climate Change** provides an assessment of the likely significant effects of the Project on the climate and the resilience of the Project to the impacts of climate change. The assessment includes a lifecycle greenhouse gas (GHG) impact assessment, an in-combination climate change impact (ICCI) assessment and a climate change risk assessment (CCRA).

Climate Change Risk Assessment

6.13.18 Table 1.1 of **Application Document 6.19.A2 Environmental Statement Appendix 19.2 Climate Change Risk Assessment** presents the climate change risks associated with the operation and maintenance phases of the Project. The UK Climate Projections 2018 (UKCP18) have been used as it provides probabilistic indications of how global climate change is likely to affect areas of the UK using pre-defined climate variables and time periods. The CCRA concludes that as a result of the embedded climate change mitigation, all climate change risks during the construction, and operation and maintenance phases of the Project are not significant.

In-Combination Climate Change Impact Assessment

6.13.19 **Application Document 6.19.A3 Environmental Statement Appendix 19.3 In-Combination Climate Change Impact Assessment** provides an assessment of the combined impact of future climate conditions and the Project on receptors in the surrounding environment. Table 1.1 presents the results of the ICCI assessment for the construction, and operation and maintenance phases of the Project.

6.13.20 Potential ICCIs during the construction, and operation and maintenance phases of the Project were assessed, together with the relevant embedded mitigation measures. While a number of ICCIs were identified across environmental topics, all were assessed as resulting in effects that are not significant.

Greenhouse Gas Emissions

6.13.21 **Application Document 6.19 Environmental Statement Chapter 19 Climate Change** concludes that construction, operation and maintenance of the Project will result in GHG emissions, with the total GHG emissions associated with the Project in the construction phase predicted to be 143,537.2 tCO_2e and in the operation (including maintenance) phase predicted to be 312,222.8 tCO_2e. A detailed breakdown of GHG emissions and opportunities to reduce these is provided in **Application Document 6.19.A4 Environmental Statement Appendix 19.4 Greenhouse Gas Reduction Strategy**.

6.13.22 The majority of construction phase GHG emissions are attributed to embodied emissions in raw materials. The main contributor to embodied carbon is from infrastructure associated with the Project. Other emission sources include emissions from material transport, construction activities, worker transport, waste, and pre-construction demolition.

6.13.23 The majority of operational phase emissions are attributed to transmission losses, accounting for 87% of operational phase emissions. Other sources of operational phase GHG emissions are associated with maintenance, repair and replacement.

6.13.24 In total, the potential GHG emissions of the Project are estimated to contribute to less than 0.1% of each respective UK carbon budget. Although the construction and operation of the Project will directly result in increased GHG emissions, to provide context, consideration also needs to be given to its role in wider UK policy to decarbonise the electricity grid. Over its lifetime, the Project will provide a key contribution to the UK fulfilling its Net Zero policy and transition away from fossil fuels.

6.13.25 By reinforcing the electricity transmission network, the Project will facilitate the connection of new renewable and low-carbon energy generation and transmission. Therefore, the effect of GHG emissions associated with the Project is deemed to be not significant.

Appraisal

6.13.26 In accordance with the requirements set out in paragraphs 4.10.1, and 4.10.8 to 4.10.11 of NPS EN-1, paragraph 2.3.3 of NPS EN-5, Policy CC1 of the East Inshore and East Offshore Marine Plans, Policy S2 of the ERYLP, Policy CS5 of the NLCS, Policy ST48 of the BLP and Policy 6R of the Misterton NP, the impacts of climate change on the Project during construction and operation and maintenance phases have been considered as set out above.

6.13.27 The Climate Change Resilience Assessment presented in **Application Document 6.19.A2 Environmental Statement Appendix 19.2 Climate Change Risk Assessment** uses historic climate data obtained from the met office, and the most recent climate change projections (UKCP 18) to assess the likelihood, magnitude and significant of a range of potential climate change risks including increases in extreme weather events, increases in winter rainfall (leading to increased flood risk), and decreases in annual precipitation with increased risk of drought (leading to drier soil conditions and reduced vegetation cover).

6.13.28 **Application Document 6.19.A3 Environmental Statement Appendix 19.3 In-Combination Climate Change Impact Assessment** provides an assessment of the combined impact of future climate hazards and the Project on topic specific receptors in the surrounding environment. This includes hazards such as increases in frequency of heatwaves, decreases in annual precipitation, and increases in winter precipitation.

6.13.29 A lifecycle GHG assessment has been undertaken and included within **Application Document 6.19 Environmental Statement Chapter 19 Climate Change** in accordance with paragraph 5.3.4 of NPS EN-1. As required by paragraph 5.3.8 of NPS EN-1 the assessment covers GHG emissions for the construction, and operation and maintenance of the Project. GHG emissions associated with decommissioning were scoped out of the assessment. Measures have been embedded into the Project design to reduce GHG emissions and provide climate change resilience where practicable. These measures are set out in section 19.8 of **Application Document 6.19 Environmental Statement Chapter 19 Climate Change** and include (but are not limited to):

- Sustainable, low-carbon materials specified and prioritised wherever practicable, supported by material selection processes aimed at minimising embodied carbon across the Project lifecycle.
- Materials sourced from local suppliers, where reasonably practicable, to minimise transportation distances and associated GHG emissions.
- Sensitive routeing and siting of permanent infrastructure and temporary works.
- Commitments included in **Application Document 7.3 Register of Environmental Actions and Commitments**.

6.13.30 As recommended by NPS EN-1 paragraph 5.3.7, In addition to the mitigation measures set out above **Application Document 6.19.A4 Appendix 19.4 Greenhouse Gas Reduction Strategy** sets out a range of further measures that are being considered on the Project in relation to GHG emissions. However, these have not been taken into account in the residual effects assessment presented in **Application Document 6.19 Environmental Statement Chapter 19 Climate Change**.

6.13.31 In accordance with paragraph 5.3.9 of NPS EN-1, Policy CC2 of the East Inshore and East Offshore Marine Plans, Policy S2 of the ERYLP and Policy 6R of the Misterton NP, **Application Document 6.19 Environmental Statement Chapter 19 Climate Change** and the GHG Reduction Strategy sets out how the GHG emissions associated with the Project should be managed and reduced.

6.13.32 Following implementation of relevant mitigation measures the Project will be in accordance with paragraphs 4.10.13 and 4.10.15 of NPS EN-1, which state that the SoS should be satisfied that applicants have taken into account the potential impacts

of climate change using the latest UK Climate Projections and that no features of the design of the development critical to its operation will be seriously affected by climate change.

6.13.33 Paragraph 5.3.10 of NPS EN-1 requires that the SoS 'must accept there are likely to be some residual emissions from construction of energy infrastructure'. Furthermore, Paragraph 5.3.11 of NPS EN-1 recognises that operational GHG emissions are not reasons to prohibit consent. The Lifecycle GHG Assessment in **Application Document 6.19 Environmental Statement Chapter 19 Climate Change** concludes that while the Project will result in GHG emissions during construction, there will not be a significant effect. During construction the Project has committed to implementing a range of best practice mitigation measures to minimise GHG emissions wherever practicable. These measures include specifying and prioritising sustainable, low-carbon materials, sourcing materials from local suppliers where reasonably practicable to reduce transportation distances and associated emissions, and utilising electric or other low-carbon plant and equipment wherever available and practicable. While it is acknowledged that the Project would result in GHG emissions during operation, it would also play an important role in facilitating the decarbonisation of the UK electricity system by enabling the connection and transmission of renewable and low-carbon energy. The Project is consistent with applicable climate policy requirements and good practice for infrastructure development and would not materially hinder the achievement of the UK's carbon budgets or net zero targets.

6.13.34 It is considered that the Project is compliant with relevant national, local and marine planning policies pertaining to climate change and GHG emissions.

6.14 Cumulative Effects

National Planning Policy Context

NPS EN-1

6.14.1 Paragraph 4.1.5 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) confirms that in weighing up the impacts and benefits of a proposed development, the SoS will also need to take into account:

- '*its potential benefits including its contribution to meeting the need for the Clean Power 2030 Mission and net zero, energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits;*
- *its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy*'.

6.14.2 Paragraph 4.2.25 relates to consideration of residual impacts and states '*the cumulative impacts of multiple developments with residual impacts should also be considered*'.

6.14.3 Paragraph 4.3.3 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) requires applicants to provide an assessment of the likely significant effects of a proposed development, in accordance with the requirements of the EIA Regulations, including any cumulative effects.

6.14.4 With respect to decision making, paragraph 4.3.19 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states *'the Secretary of State should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place'.*

6.14.5 Section 4.4 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out policy on the consideration of health with respect to energy proposals stating, in paragraph 4.4.5, that *'the impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate'.*

NPS EN-3

6.14.6 NPS EN-3 (Department for Energy Security and Net Zero, 2025) paragraph 2.8.65 states '*Assessment of environmental effects of transmission infrastructure and any proposed offshore or onshore substations should assess effects both alone and cumulatively with other existing and proposed infrastructure*'.

NPS EN-5

6.14.7 NPS EN-5 (Department for Energy Security and Net Zero, 2025) reiterates the policy positions of NPS EN-1 (Department for Energy Security and Net Zero, 2025) confirming the need to consider cumulative impacts within the ES and this being an overall consideration as part of the planning balance exercise.

NPPF and PPG

6.14.8 Policies TR6, P3, and F1 of the NPPF (Ministry of Housing Communities and Local Government, 2026) contain similar cumulative impact policies to the NPS' and are therefore not repeated here. PPG: Environmental Impact Assessment (Ministry of Housing, Communities and Local Government, 2020) Paragraph 024 requires regard to be had to the possible cumulative effects arising from development.

Local Planning Policy Context

East Riding of Yorkshire Council planning policy

6.14.9 Policy EC2 (Developing and diversifying the visitor economy) and Policy EC5 (Supporting the renewable and low carbon energy sector) of the ERYLP (East Riding of Yorkshire Council, 2025) require consideration of the cumulative impacts of development.

Bassetlaw District Council planning policy

6.14.10 Policy 46 (Protecting Amenity), Policy ST49 (Renewable Energy Generation) and Policy ST52 (Transport Infrastructure) of the BLP (Bassetlaw District Council, 2024) require consideration of the cumulative impacts of development.

Assessment Conclusions

Intra-project Cumulative Effects

6.14.11 **Application Document 6.20 Environmental Statement Chapter 20 Intra-project Cumulative Effects** assesses the intra-project cumulative effects of the Project. Intra-project cumulative effects occur where a single receptor is affected by more than one source of effect arising from different aspects of the same project. An example of an intra-project cumulative effect would be where a residential receptor is affected by temporary visual effects of construction works, noise and traffic disruption during the construction of a project, with the resulting effect being greater than each individual effect alone.

6.14.12 As set out in **Application Document 6.20 Environmental Statement Chapter 20 Intra-project Cumulative Effects,** significant intra-project cumulative effects have been identified on the following residential receptors during construction:

- A group of residential receptors on Wood Lane (PAR 90) in Beckingham community;
- A residential receptor on Staddlethorpe Broad Lane (PAR 131) in Blacktoft community;
- A group of residential receptors on Landing Lane (PAR 159) in Broomfleet community;
- A group of residential receptors on PAR 45 Outgate (west) in Crowle and Ealand community;
- A group of residential receptors on Newland Lane (PAR 64B) in Epworth community;
- A group of residential receptors on Fledborough Road (PAR 139) in Fledborough Community;
- A group of residential receptors on Cornley Road in Misterton community;
- A group of residential receptors on Melwood Hill (north) (PAR 63) in Owston Ferry community; and
- A group of residential receptors on Riplingham Road (PAR 10B) in Rowley community.

6.14.13 These effects are anticipated to arise because of the potential for visual, noise and severance effects reported in the ES combining to make significant intra-project cumulative effects. These effects would only arise during construction, and would therefore be temporary.

6.14.14 There is one residential receptor (R_2150) in Ousefleet in Twin Rivers community where visual amenity has been assessed as moderate adverse whilst operational noise is assessed as not significant, but these factors may combine in such a way as to lead to a significant intra-project cumulative effect during operation. It is noted however that operational noise effects are only predicted under the scenario where the LoD are used and the proposed overhead line is on the edge of the LoD and in wet conditions. Therefore, the intra-project cumulative effect would only occur in the instance that the conditions above were met. As a worst case, the intra-project cumulative effect is assessed as significant.

6.14.15 Significant intra-project cumulative effects are also anticipated during construction on the following transport receptors:

- Transport users on PAR 124 Top Street/Darlton Road in Darlton and East Drayton communities;
- Transport users on PAR 135 Meredyke Road (West) in Garthorpe and Fockery and Luddington with Haldenby communities;
- Transport users on PAR 115 Retford Road in Rampton and Woodbeck community;
- Transport users on PAR 108 Town Street/Forewood Lane in Treswell community; and
- Transport users on PAR 72 Ferry Road/Main Street in Haxey community.

6.14.16 These effects are anticipated to arise because of the potential for visual and transport related effects reported in the ES combining to make significant intra-project cumulative effects. These effects would only arise during construction and would therefore be temporary.

6.14.17 Significant effects are also anticipated during construction only on the following PRoW, Rights of Navigation and other accesses:

- The Yorkshire Wolds Way in Ellerker community;
- The Trent Valley Way in Belton community;
- The Trans-Pennine Trail in Blacktoft and Broomfleet communities;
- The High Hunsley Circuit, in Ellerker community;
- The Cuckoo Way in Gringley on the Hill community;
- Beverley Footpath 20 in Rowley and Skidby communities;
- National Cycle Network Route 65 in Broomfleet and Ellerker communities;
- National Cycle Network Route 647 in Fledborough and Marnham communities;
- Market Weighton Canal in Blacktoft and Broomfleet communities; and
- Chesterfield Canal in Gringley on the Hill community.

6.14.18 These effects are anticipated to arise because of the potential for visual and recreational and amenity related effects reported in the ES combining to make significant intra-project cumulative effects. These effects would only arise during construction and would therefore be temporary.

Inter-project Cumulative Effects

6.14.19 **Application Document 6.21 Environmental Statement Chapter 21 Inter-project Cumulative Effects** assesses the inter-project cumulative effects of the Project Inter-project cumulative effects arise where two or more developments lead to cumulative effects on the same receptor. Such developments may be reasonably foreseeable and/or consented without currently forming part of the baseline environment, but would be within close enough proximity to the Project to lead to significant cumulative effects on the same receptors.

6.14.20 **Application Document 6.21 Environmental Statement Chapter 21 Inter-project Cumulative Effects** identifies a 'short list' of major developments within the Project's Zone of Influence (ZoI) to be considered in the inter-project cumulative effects assessment. The short list of other existing and/or approved developments taken forward into the assessment is set out in **Application Document 6.21.A14 Environmental Statement Appendix 21.14 Short List of Other Developments** and shown on **Application Document 6.21.F2 Environmental Statement Figure 21.2 Cumulative Effects Assessment: Short List of other Developments**. In some cases there are several other existing and/or approved developments within the short list where an assessment of cumulative effects is not possible, due to the fact that no environmental assessment outputs or an Environmental Scoping Report are available for the projects.

6.14.21 **Application Document 6.21 Environmental Statement Chapter 21 Inter-project Cumulative Effects** assesses the inter-project cumulative effects for each major development within the ZoI against each topic area covered within the ES, where sufficient information is available.

6.14.22 The assessment concludes that following the implementation of embedded mitigation measures there would be no significant adverse residual inter-project cumulative impacts in relation to ecology, ornithology, water environment, geology and hydrogeology, traffic and transport, air quality, noise and vibration, and health and wellbeing.

6.14.23 Significant adverse inter-project cumulative effects are reported during construction and/or operation for landscape, and visual. In the majority of these cases, most of the significant adverse cumulative effects during construction and/or operation would be attributable to the size and scale of the solar development, wind farm or carbon capture pipeline, while the proposed overhead line would be a more limited addition and would not be uncharacteristic of the existing landscape.

6.14.24 Significant adverse inter-project cumulative effects are reported during construction and operation on Risby Jacobean gardens, hall and medieval settlement remains scheduled monument (NHLE 1018600) in relation to Clean Air Solar Farm. Detailed design information is not available, but assuming solar photovoltaic panels would be located in the part of the Order Limits comprising the fields to the south of the hall. This would represent further erosion of a view associated with the hall's design intent, which contributes to its setting and heritage value. The resulting effect is likely to be significant but is unlikely to be greater than that assessed for the Project. It is concluded that screening planting would constitute an adverse impact to views and setting and would not be an appropriate mitigation response, therefore there is no appropriate mitigation available.

6.14.25 Significant adverse inter-project cumulative effects are reported during construction and operation for agriculture and soils. The Project has a major adverse effect on its own due to the permanent loss of BMV land, therefore any further loss of BMV land associated with the shortlisted other developments would be cumulatively significant. As effects relate to the permanent loss of agricultural land, there are no additional mitigation measures that could be adopted to reduce effects.

Appraisal

Intra-project Cumulative Effects

6.14.26 In accordance with national policy, an assessment of the cumulative effects of the Project has been undertaken to assess whether there are any effects of the Project, that when combined with the effects of other developments, would become significant. It also assessed whether any significant effects from the Project, are made greater when considering Project alongside other developments.

6.14.27 **Application Document 6.20 Environmental Statement Chapter 20 Intra-project Cumulative Effects** assesses intra-project cumulative effects of the Project, to analyse if there are multiple effects on individual receptors. It concludes that one residential receptor (R_2150) in Ousefleet in the Twin Rivers community would result in significant intra-project cumulative effects during operation, as a worst-case scenario, only if the LoD are used and the proposed overhead line is on the edge of the LoD and in wet conditions (audible noise from overhead lines has the potential to be greater in wet weather conditions). Groups of residential receptors in 9 communities, transport users on 5 PARs, and 10 PRoWs, Rights of Navigation and other accesses would experience significant intra-project cumulative effects during construction due to interactions between effects such as visual, noise, severance and recreation and amenity. These effects would only arise during the construction period and would therefore be temporary.

6.14.28 Although there are a large number of significant cumulative effects reported, this is typically due to the contributing effects already being significant, rather than them becoming significant or increasing in significance only once they are combined. In most cases where contributing effects were significant separately, the addition of the 'other' effect has not substantially increased the overall significance of effects

6.14.29 The benefits of the Project are substantial in terms of its contribution to the transition to net zero and the urgently needed reinforcement to the transmission system in the Humber and East Midlands, as well as the minor benefit of the creation of jobs during the construction of the Project, and it is considered that the need and benefits clearly outweigh its adverse intra-project cumulative impacts. Therefore, following implementation of embedded mitigation measures, the Project is in accordance with paragraphs 4.1.5, 4.2.25, 4.3.3, 4.3.19 and 4.4.5 of NPS EN-1, the NPPF, PPG and relevant local policies relating to cumulative impacts.

Inter-project Cumulative Effects

6.14.30 **Application Document 6.21 Environmental Statement Chapter 21 Inter-project Cumulative Effects** provides a four-stage assessment of how the surrounding development affects the different receptors assessed within the ES.

6.14.31 Mitigation, control and management measures are embedded into the design of the Project to avoid or reduce significant environmental and socio-economic effects as far as practicable. These are committed to in **Application Document 7.3 Register of Environmental Actions and Commitments**.

6.14.32 **Application Document 6.21 Environmental Statement Chapter 21 Inter-project Cumulative Effects** concludes that following the implementation of embedded mitigation measures, no significant adverse residual inter-project cumulative effects are anticipated in relation to ecology, ornithology, water environment, geology and hydrogeology, traffic and transport, air quality, noise and vibration, and health and

wellbeing, as a result of the construction and operation of the Project, alongside other developments.

6.14.33 Significant residual adverse inter-project cumulative effects are anticipated in relation to:

- Landscape and visual receptors during construction and operation due to the introduction of the Project alongside large scale solar, wind and carbon capture projects;
- Agriculture and soil due to the permanent loss of BMV land; and
- Designated heritage asset Risby Jacobean gardens, hall and medieval settlement remains scheduled monument (NHLE 1018600).

6.14.34 The benefits of the Project are substantial in terms of its contribution to the transition to net zero and the urgently needed reinforcement to the transmission system in the Humber and East Midlands, as well as the minor benefit of the creation of jobs during the construction of the Project, and it is considered that the need and benefits clearly outweigh its adverse inter-project cumulative impacts. Therefore, following implementation of embedded mitigation measures, the Project is in accordance with paragraphs 4.1.5, 4.2.25, 4.3.3, 4.3.19 and 4.4.5 of NPS EN-1, the NPPF, PPG and relevant local policies relating to cumulative impacts.

6.15 Civil and Military Aviation and Defence Interests

National Planning Policy Context

NPS EN-1

6.15.1 Paragraph 5.5.7 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out that the '*UK airspace is important for both civilian and military aviation interests. It is essential that new energy infrastructure is developed collaboratively alongside aerodromes, aircraft, manned and unmanned air systems and airspace so that safety, operations and capabilities are not adversely affected by new energy infrastructure. Likewise, it is essential that aerodromes, aircraft, air systems and airspace operators work collaboratively with energy infrastructure developers essential for net zero*'.

6.15.2 Paragraphs 5.5.13 and 5.5.14 outline that the areas around aerodromes used by aircraft for take off and on approach to landing are described as '*obstacle limitation surfaces (OLS)*' and that care must be taken to ensure that new developments do not infringe on these areas.

6.15.3 Paragraph 5.5.38 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) requires development that may affect the performance of civil or military aviation communication, navigation, and surveillance, meteorological radars and/or other defence assets to provide an assessment of potential effects in the ES.

6.15.4 Paragraph 5.5.40 outlines that applicants should consult the Ministry of Defence, Met Office, Civil Aviation Authority and National Air Traffic Service and any aerodrome licensed or otherwise that is likely to be affected when undertaking their assessment.

6.15.5 Paragraph 5.5.42 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) sets out that development near aerodromes should take into account the following factors:

- '*Bird Strike Risk – Aircraft are vulnerable to wildlife strike, in particular bird strike. Birds and other wildlife may be attracted to the vicinity of an aerodrome by various types of development, for example, large buildings with perching/roosting opportunities for birds. It is therefore important that infrastructure, buildings and other elements from energy installations, as well as environmental mitigation and enhancement are designed in such a way so as not to increase the bird strike risk to the airport for developments within 13km (this can vary).*
- Building Induced Turbulence – If a significant building or structure is proposed close to the airport/runways, there is potential for building induced turbulence/wind shear to be created which has the potential to impact on aircraft on take-off and landing. Studies may be required to identify the *extent of any turbulence resulting from the energy infrastructure*'.

6.15.6 In terms of decision-making, NPS EN-1 (Department for Energy Security and Net Zero, 2025) paragraph 5.5.51 requires the SoS to be '*satisfied that the effects on meteorological radars, civil and military aerodromes, aviation technical sites and other defence assets or operations have been addressed by the applicant and that any necessary assessment of the proposal on aviation,* [National Severe Weather Warning Service] *or defence interests has been carried out'.*

6.15.7 Paragraph 5.5.52 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) adds '*in particular, the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes and that realistically achievable mitigation is carried out on existing surveillance systems such as radar/tracking technologies. It is incumbent on Operators of aerodromes to regularly review the possibility of agreeing to make reasonable changes to operational procedures*'.

Assessment Conclusions

6.15.8 **Application Document 5.9 Design Development Report** Appendix A Aviation Assessment details the assessment carried out by National Grid to evaluate the risk to operations at eight aerodromes along the route of the Project. It also considers military aviation CNS, meteorological radars and other defence assets. **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** provides an assessment of likely significant effects relating to commercial and recreational use of the affected aerodromes as a result of the Project, based on the assessment carried out in **Application Document 5.9 Design Development Report** Appendix A Aviation Assessment. There are eight unlicensed aerodromes located within 500 m of the Project; these include: Mount Airy Airfield, West Burton Airstrip, Headon Airfield, Forwood Farm, Grove Farm, Darlton Gliding Club, Willow Farm and Haxey Airfield.

6.15.9 A high level assessment has also been carried out in **Application Document 5.9 Design Development Report** Appendix A Aviation Assessment, of four additional aerodromes located further from the overhead line, including Retford/Gamston Aerodrome, Humberside International Airport, Sandtoft Aerodrome, and Doncaster Sheffield Airport. Willow Farm is located within Doncaster/Sheffield Airport's Control Zone which is classified as Class D Airspace. This means that aircraft operating in

and out of Willow Farm will be required to contact the relevant air traffic control service to request permission to enter this airspace. Following the assessment carried out in **Application Document 5.9 Design Development Report** Appendix A Aviation Assessment, no conflict exists between the additional aerodromes and the Project due to the distance between them.

6.15.10 Significant adverse effects are anticipated on the commercial and recreational use of three aerodromes as a result of the Project, as set out in **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism.**

6.15.11 At Forwood Farm, the proposed overhead line would conflict with the existing eastern flight circuit and as no operational mitigation is currently considered achievable, it is assessed that safe flying operations cannot continue at the aerodrome as currently operated. Discussions remain ongoing with the aerodrome to understand whether any further operational mitigations could be applied. As a worst case this would result in the permanent cessation of all aviation-related commercial activity at the site, including aircraft storage, flight training, aircraft inspection and repair, and banner flying, with associated indirect effects on the linked caravan use. It is therefore assessed that safe flying operations cannot continue at the aerodrome, resulting in the permanent loss of recreational access for resident aircraft owners, visiting pilots, and trainees currently using the site. This results in a permanent major adverse effect on commercial operations and recreational use, which is significant.

6.15.12 At Headon Airfield, the proposed overhead line would constrain elements of circuit-based instruction currently delivered as part of the microlight training programme, potentially reducing the attractiveness of the training package where prospective trainees favour facilities able to deliver all elements of instruction on-site. Operational mitigations including ceasing low-level circuit training and increasing circuit height to 1,000 ft were also considered feasible. Flying activity would therefore continue, and the core business functions of resident flying, aircraft storage and flight instruction would be preserved, although there is anticipated to be an impact on the business, with no material effect anticipated on the wider economy. Resident flyers and students would retain access to the airfield and its core recreational and training functions, however, the constraint on low-level circuit training may still reduce the range of recreational flying experiences available, particularly for those undertaking circuit-based microlight instruction. Additionally, although low level circuits could not be undertaken from the site, this part of the training syllabus could be delivered from elsewhere - either at Retford Gamston Airport or in the open countryside. Overall, this results in a permanent moderate adverse effect, which is significant on commercial operations and recreational use.

6.15.13 Darlton Gliding Club supports 3,000 winch launches per year, which forms the great majority of operations, supplemented by a smaller number of aero tow launches (approximately 150–200 per year) which support higher-value visitor experiences, competition flying, and longer-duration flights. Whilst the club does not own its own powered tug aircraft (to facilitate aero tow launches), the club merged with Trent Valley Gliding Club in October 2025, moving an additional 34 members to Darlton Gliding Club, as well as two aerotow tugs and two powered gliders, potentially increasing its role in regional gliding provision. The proposed overhead line would only permit aero tow operations to continue when taking-off in a south-westerly direction. Regardless of the above however, gliders could continue operate from both runway directions with no modification to their circuit patterns using winch launches instead of aerotow launches, and as winch launching represents the majority of

operations and is expected to continue, the club would remain open, and the majority of recreational gliding activity (winch launching, training, and community engagement) would continue. No material impact is expected on the wider economy. Overall, this results in a permanent major adverse effect on commercial operations and recreation, which is significant.

6.15.14 No significant adverse effects are anticipated on the remaining five unlicensed aerodromes, which includes Mount Airy Airfield, West Burton Airfield, Haxey Airfield, Willow Farm Airfield and Grove Farm.

Appraisal

6.15.15 An assessment of the Project's potential impacts on civil or military aviation CNS, meteorological radars and/or other defence assets has been carried out and is set out in **Application Document 5.9 Design Development Report** Appendix A Aviation Assessment and **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism**.

6.15.16 National Grid has engaged aerodrome operators potentially impacted by the Project at an early stage, in addition to the Ministry of Defence (MOD), Civil Aviation Authority, Met Office and NATS, and consultation undertaken is set out in **Application Document 5.1 Consultation Report**.

6.15.17 National Grid has embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. These include sensitive routeing and siting of infrastructure and temporary works to avoid or reduce impacts on socio-economics, recreation and tourism receptors including aviation; limiting construction activities to defined daytime core working hours, reducing general disruption to nearby communities, local businesses, and tourism/recreation receptors including aviation; and a number of other commitments made within **Application Document 7.3 Register of Environmental Actions and Commitments**. Measures have also been discussed with aerodrome owners/operators to identify suitable mitigation to the potential impacts of the overhead line on operations and recreation, as discussed above. One of these commitments is that the final constructed pylon locations and vertical heights will be shared with the affected aerodromes to ensure Project structures can be accurately charted by the relevant aerodromes impacted.

6.15.18 **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** concludes that three out of the eight unlicensed aerodromes located within 500 m of the Project are anticipated to experience significant adverse impacts on commercial operations and recreational use due to the construction of the proposed overhead line as discussed above. These aerodromes are Forwood Farm Airfield, Headon Airfield, and Darlton Gliding Club. Although significant adverse impacts are expected, two of these airfields can continue their use, with only one airfield needing to permanently cease operations as a worst case scenario. The affected airfields are currently only used for recreational activities and are not used currently for military or defence operations.

6.15.19 In addition, a high level assessment was undertaken on four additional aerodromes located further away from the Project, including Retford/Gamston Aerodrome, Humberside International Airport, Sandtoft Aerodrome, and Doncaster Sheffield Airport, however, no conflict exists between them and the Project.

6.15.20 As set out in **Application Document 5.9 Design Development Report** Appendix A Aviation Assessment, consultation with the MOD Defence Infrastructure Organisation (DIO) confirmed that the proposed development area of the Project occupies the statutory safeguarding zones that surround the East 1 Wide Area Multilateration (WAM) Network which contributes to aviation safety by feeding into the air traffic management system in eastern England. The proposed development area is also within Military Low Flying Areas (LFA) 06 and 11.

6.15.21 National Grid has engaged with the MOD Defence Infrastructure Organisation (DIO) by providing detailed Project design information including updates to overhead line alignments and indicative tower heights which allowed for the MOD DIO to assess the potential impacts on the identified assets. With respect of the interactions of the Project with the Clarborough to Belmont and the Clarborough to Waddington WAM Microwave Links, engagement with the MOD DIO and assessment by National Grid is on-going to understand the potential Project impacts on the military communications infrastructure which will be informed through the provision of detailed Project design information. To ensure the proposed overhead line does not physically affect the WAM networks the MOD DIO has requested requirements to be included within the draft Development Consent Order. The inclusion of such requirements within the DCO is subject to on-going assessment work by National Grid.

6.15.22 In relation to the impact of the Project on Military Low Flying Areas 06 and 11 the MOD DIO has requested that the Project provide information on the construction of new pylons and any removal or modifications to the siting of existing pylons so aviation chart data can be updated. In addition, the Project will provide MOD DIO with information about where crane deployments will occur to maintain the safety of military aircraft engaging in low flying training activities as requested by the MOD DIO who have requested that requirements be included within the draft Development Consent Order to secure this. The inclusion of such requirements within the DCO is subject to on-going assessment work by National Grid.

6.15.23 National Grid identified that part of the proposed alignment of the Project south of Gainsborough was within the statutory safeguarding zone of the Ingham Meteorological Technical Site, a C-band weather radar station operated by the Met Office, part of the UK rain radar network. National Grid has engaged with the Met Office by providing detailed project design information including indicative pylon heights which allowed for assessment of impacts on the identified meteorological asset. The Met Office confirmed that they had no comments on the proposal and do not need to be consulted further.

6.15.24 Paragraph 5.5.42 of NPS EN-1 identifies a number of other factors that should be taken into account when considering development near aerodromes which include the possibility of an increased risk of an aircraft bird strike, the possible impacts on Instrument Flight Procedures (IFPs) and possible induced wind turbulence from a new building or structure.

6.15.25 **Application Document 5.9 Design Development Report** Appendix A Aviation Assessment concludes that the introduction of the Project would not result in an increase in the population size of birds, especially bird species which typically cause the largest threat of collision with aircraft such as larger wetland species such as geese, swans, duck and waders.

6.15.26 It has also been considered whether EMF from the overhead line might impact aircraft avionics or other aircraft systems, compromising operational safety. It is

assessed that minimum clearances allowed for aircraft overflying or otherwise within the vicinity of the overhead line will enable aircraft to be sufficiently distanced to avoid unacceptable adverse effects and is therefore safe. This assessment is justified by National Grid's direct experience of working with aircraft operators in very close proximity to live overhead lines (within tens of metres), while carrying out routine visual asset assessment regimes in unmodified helicopters, with no impacts on instrumentation noted.

6.15.27 In addition to the clearances to aircraft operating under Visual Flight Rules (VFR) there are also prescribed obstacle clearances for aircraft following Instrument Flight Procedures (IFP) whilst arriving at and departing from aerodromes. These are referred to as Standard Instrument Departures (SIDs) and Standard Terminal Arrival Route (STARs) and are typically flown by commercial aircraft. None of the aerodromes assessed operate any IFPs and it is not anticipated that they will do in the future, except for Doncaster Sheffield Airport, where no conflict is expected due to the distance between it and the Project.

6.15.28 In terms of wind turbulence effects, there appears to be no evidence of electricity pylons causing wind turbulence effects on aircraft. This is likely due to the open 'lattice' type nature of the structures, generating much smaller wake effects and significantly less mechanical turbulence than a solid obstacle of equivalent height. It is therefore considered that the presence of the overhead line will not increase the risk of wind turbulence for aircraft.

6.15.29 Following implementation of the mitigation measures proposed, the Project is in accordance with paragraphs 5.5.7, 5.5.13, 5.5.14, 5.5.38, 5.5.40–42, 5.5.51 and 5.5.52 of NPS EN-1, the NPPF, PPG and relevant local policies relating to civil and military aviation and defence interests.

6.16 Dust, Odour, Artificial Light, Smoke, Steam and Insect Manifestation

National Planning Policy Context

NPS EN-1

6.16.1 Paragraph 5.7.1 of NPS EN-1 sets out that '*during the construction, operation and decommissioning of energy infrastructure there is potential for the release of a range of emissions such as odour, dust, steam, smoke, artificial light and infestation of insects. All have the potential to have a detrimental impact on amenity or cause a common law nuisance or statutory nuisance under Part III, Environmental Protection Act 1990. However, they are not regulated by the environmental permitting regime, so mitigation of these impacts will need to be included in the Development Consent Order*'.

6.16.2 Paragraph 5.7.5 requires applicants to assess the potential for insect infestation and emissions of odour, dust, steam, smoke, and artificial light to have a detrimental impact on amenity, as part of the ES. Paragraph 5.7.6 goes further and outlines that the assessment provided by the applicant should describe the following:

- *'the type, quantity and timing of emissions*
- *aspects of the development which may give rise to emissions*

- *premises or locations that may be affected by the emissions*
- *effects of the emission on identified premises or locations*
- *measures to be employed in preventing or mitigating the emissions'*.

6.16.3 In terms of mitigation, paragraphs 5.7.8 to 5.7.11 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) set out that engineering measures, layout and administrative procedures along with a construction management plan may help to minimise emissions and secure mitigation.

6.16.4 Paragraph 5.7.12 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) requires that the SoS should satisfy itself that:

- *'an assessment of the potential for artificial light, dust, odour, smoke, steam and insect infestation to have a detrimental impact on amenity has been carried out*
- *that all reasonable steps have been taken, and will be taken, to minimise any such detrimental impacts*'.

PPG

6.16.5 The PPG: Air quality (Ministry of Housing, Communities and Local Government, 2019) Paragraph: 006 Reference ID: 32-006-20191101 sets out the considerations that may be relevant when determining planning applications which includes exposure to dust.

Local Planning Policy Context

East Riding of Yorkshire Council planning policy

6.16.6 Policy EC5 (Supporting the renewable and low carbon energy sector) of the EYLP (East Riding of Yorkshire Council, 2025) sets out that development for the energy sector will be supported where any significant adverse impacts on local amenity are addressed satisfactorily and the residual harm is outweighed by the wider benefits.

North Lincolnshire Council planning policy

6.16.7 Policy DS1 (General Requirements) of the NLLP (North Lincolnshire Council, 2003) considers amenity and requires that development will not lead to unacceptable loss of amenity to neighbouring land uses as a result of smell, fumes, dust or other nuisance.

Bassetlaw District Council planning policy

6.16.8 Policy 46 (Protecting Amenity) of the BLP (Bassetlaw District Council, 2024) requires proposals for development should be designed and constructed to avoid and minimise impacts on the amenity of existing and future users, individually and cumulatively, within the development and close to it.

Neighbourhood planning policy

6.16.9 The following Neighbourhood Plans and policies are relevant to the Project in terms of dust, odour, artificial light, smoke, steam and insect Infestation:

- HUGS Neighbourhood Plan (2018) (Nether Headon, Upton, Grove and Stokeham Parish, 2018) Policy 6: Dark Skies; and
- Misterton Neighbourhood Plan (2024) (Misterton Parish Council, 2024) Policy 6R: Renewable Energy, Energy Efficiency and Low Carbon Technologies.

Assessment Conclusions

6.16.10 An assessment of the Project's potential environmental emissions on local amenity and human health has been carried out and is set out across **Application Document 6.15 Environmental Statement Chapter 15 Air Quality**, **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration**, **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**.

6.16.11 National Grid has embedded comprehensive measures into the design of the Project to avoid or reduce significant environmental effects that may otherwise be experienced by nearby communities during construction and operation (and maintenance) of the Project. These are detailed within **Application Document 7.3 Register of Environmental Actions and Commitments**.

6.16.12 A final Code of Construction Practice (CoCP), alongside its subordinate Noise and Vibration Management Plan and Dust Management Plan in accordance with **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.7 Outline Noise and Vibration Management Plan** will be submitted for approval in accordance with the relevant Requirements of the draft DCO prior to the commencement of development. The implementation of the Project in accordance with these approved plans will enforce BPM across all active work sites to protect human receptors and safeguard local environmental amenity.

6.16.13 Matters relating to statutory nuisance under section 79(1) of the Environmental Protection Act 1990 are addressed within **Application Document 5.3 Statement of Statutory Nuisance**.

6.16.14 A topic by topic summary of where potential amenity effects are considered and, where relevant, addressed is provided below.

Dust

6.16.15 An assessment of dust emissions has been undertaken to determine whether the Project may have adverse effects on local amenity and human health. The individual construction dust risk assessments can be found in **Application Document 6.15.A2 Environmental Statement Appendix 15.2 Construction Dust Methodology and Assessment**.

6.16.16 Proposed mitigation and management measures during construction are set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, including the implementation of a Dust Management Plan secured through the relevant Requirements of the **Application Document 3.1 Draft Development Consent Order**. Following the implementation of these proposed standard mitigation measures, the temporary residual effects during construction are anticipated to be not significant.

6.16.17 In line with NPS EN-1 (Section 5.7) for electricity transmission infrastructure, operational air quality and dust effects from overhead lines and substations are likely to be negligible, as maintenance activities involve only infrequent light vehicle visits and non-intrusive routine inspections. During the operational phase, the physical presence of the overhead line and routine maintenance activities, which are limited to infrequent visual inspections and minor component maintenance using light vehicles, will not generate perceptible dust emissions or air quality impacts, and potential effects during operation were scoped out of detailed assessment in **Application Document 6.15 Environmental Statement Chapter 15 Air Quality**. To the extent that any ground disturbance may arise during non-routine asset repairs, standard National Grid environmental maintenance procedures and best practice controls will ensure no adverse dust impacts on local amenity or human receptors occur.

Artificial light

6.16.18 An assessment of artificial light emissions has been undertaken to determine whether the Project may have adverse effects on local amenity and human receptors. The proposed temporary lighting requirements for the Project are described in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project** and subject to assessment in **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**.

6.16.19 Exterior and interior lighting would be provided at construction sites and compounds to allow for safe movement and the operation of equipment. All lighting would be designed in accordance with the appropriate design standards and be motion-sensor activated. A typical construction day would consist of 12 hours, which in winter would require working in the dark at either end of the day. For the purposes of the ES, it is therefore assumed that winter working would require lighting at certain sites, but this would not apply Project-wide.

6.16.20 Without applying mitigation measures, there would be the potential for temporary light spill and intrusion into adjacent properties. However, proposed standard mitigation and management measures are set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**. Following the implementation of these proposed standard mitigation measures, the temporary residual effects of construction lighting are not anticipated to be significant.

Steam, insect infestation and odour

6.16.21 An assessment of steam, insect infestation, and odour emissions has been undertaken to determine whether the Project may have adverse effects on local amenity and human receptors. As reported in **Application Document 5.3 Statement of Statutory Nuisance**, the Project is not anticipated to generate steam, smell, or other effluvia which could cause a nuisance or be prejudicial to health during construction or operation. Furthermore, it is not anticipated that the Project would result in any insect infestation, as no materials would be stored on-site that could attract insects. Any food waste from the temporary construction compounds would be regularly removed off-site and managed in accordance with standard procedures.

6.16.22 Without applying mitigation measures, the potential for these specific matters to affect surrounding premises remains negligible. However, to ensure general good

site practice, a preliminary framework of control and management measures is set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.

Appraisal

6.16.23 In accordance with paragraph 5.7.6 of NPS EN-1, the ES describes all potential emissions affecting human receptors, and the mitigation measures which avoid or reduce such effects. Engagement has been undertaken with local Environmental Health Departments, as described in **Application Document 5.1 Consultation Report**. This engagement has included confirming the necessary baseline monitoring and agreement of appropriate mitigation.

6.16.24 Whilst unmitigated construction activities have the potential to result in significant effects on amenity due to dust, the mitigation measures successfully avoid or reduce such emissions to the extent all residual effects are not significant.

6.16.25 Following the implementation of the mitigation measures, any temporary residual effects on local amenity and human health are anticipated to be not significant, with no effects identified that would represent a common law or statutory nuisance under section 79(1) of the Environmental Protection Act 1990.

6.16.26 Based on the assessment carried out across the environmental documentation and the conclusions set out above, the Project is in accordance with paragraphs 5.7.1, 5.7.5, 5.7.6, and 5.7.12 of NPS EN-1, Paragraph 006 of the PPG: Air Quality, as well as the relevant local policies relating to amenity, as summarised above in this section.

6.17 Land Use and Green Infrastructure

6.17.1 This section considers the planning policy relevant to land use. The Project does not interact with areas designated as Open Space or Green Belt and as a result, National and Local Policy on these matters is not considered in this Planning Statement.

National Planning Policy Context

NPS EN-1

6.17.2 Paragraph 5.11.1 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) acknowledges that energy infrastructure projects will have a direct effect on the existing use of the proposed site and may have indirect effects on the use of land in the vicinity.

6.17.3 Paragraph 5.11.4 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) identifies that the development of land may affect soil resources through physical loss or damage to soil resources.

6.17.4 Paragraph 5.11.7 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) recognises that green infrastructure can '*enable developments to provide positive environmental, social, health and economic benefits*'.

6.17.5 Paragraph 5.11.8 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states that the ES '*should identify existing and proposed land uses near the project,*

any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan. The assessment should be proportionate to the scale of the preferred scheme and its likely impacts on such receptors'.

6.17.6 Paragraph 5.11.12 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) considers the loss of agricultural land and outlines that '*Applicants should seek to minimise impact on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the agricultural land classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5)*'.

6.17.7 Paragraph 5.11.17 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) adds '*Applicants should ensure that a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination*'.

6.17.8 Paragraph 5.11.19 requires applicants to safeguard any mineral resource on the proposed site.

6.17.9 Paragraph 5.11.23 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states '*although in the case of most energy infrastructure there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site (assuming that some of that use can still be retained post project construction) applicants should nevertheless seek to minimise these effects and the effects on existing or planned uses near the site by the application of good design principles, including the layout of the project and the protection of soils during construction*'.

6.17.10 Paragraph 5.11.24 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) states '*Where green infrastructure is affected, the Secretary of State should consider imposing requirements to ensure the functionality and connectivity of the green infrastructure network is maintained in the vicinity of the development and that any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space including appropriate access to National Trails and other public rights of way and new coastal access routes*'.

6.17.11 Paragraph 5.11.28 requires appropriate mitigation measures to be put in place to safeguard mineral resource, should a proposed development have a direct impact on an MSA. Paragraph 5.11.29 adds that '*Where a project has a sterilising effect on land use (for example in some cases under transmission lines) there may be scope for this to be mitigated through, for example, using or incorporating the land for nature conservation or wildlife corridors or for parking and storage in employment areas*'.

NPPF

6.17.12 Policy DP3 of the NPPF (Ministry of Housing, Communities and Local Government, 2026) sets out that proposals should '*incorporate and/or connect to a network of high quality, accessible, multi-functional green infrastructure to provide opportunities for recreation and healthy living, strengthen habitats, improve climate change resilience and improve air and water quality. This should include maintaining and enhancing tree cover* […]', should enable and support healthy lives, including through the provision of safe and accessible green infrastructure. Policy CC1 of the NPPF sets

out that new development should be planned for in ways that avoid increasing vulnerability to the range of impacts arising from climate change including through identifying opportunities for green infrastructure.

6.17.13 Policy M3 of the NPPF (Ministry of Housing, Communities and Local Government, 2026) sets out that great weight should be given to the benefits of mineral extraction, including to the economy.

Local Planning Policy Context

East Riding of Yorkshire Council planning policy

6.17.14 Policy EC5 (Supporting the renewable and low carbon energy sector) of the ERYLP (East Riding of Yorkshire Council, 2025) requires development and its associated infrastructure to be acceptable in terms of aeronautical impacts, such as on radar systems.

6.17.15 A number of local planning policies consider the protection of mineral resources. Policy EC6 (Protecting Mineral resources) of the ERYLP (East Riding of Yorkshire Council, 2025) provides that MSAs have been established and non-mineral development that will adversely affect the viability of the mineral deposit will only be supported in the circumstances outlined in the policy.

6.17.16 Policy EC5 (Supporting the renewable and low carbon energy sector) and Policy ENV6 (Managing environmental hazards) of the ERYLP set out policy considerations in relation to contamination and land instability.

North Lincolnshire Council planning policy

6.17.17 Policy CS21 (Minerals) of the NLCS (North Lincolnshire Council, 2011) outlines that minerals will be safeguarded and provides that major development will only be permitted in MSAs when criteria a to f of the policy have been met.

6.17.18 Policy M8 (Safeguarding Aggregate Minerals) of the NLLP (North Lincolnshire Council, 2003) outlines in general that existing aggregate mineral resources, wharves and railhead facilities will be safeguarded from development that may sterilise or adversely affect their operation.

6.17.19 Policy DS7 (Contaminated Land) of the NLLP sets out considerations in relation to contamination and land instability.

Nottinghamshire County Council planning policy

6.17.20 Policy SP7 (Minerals Safeguarding, Consultation Areas and Associated Minerals Infrastructure) in the Nottinghamshire Minerals Local Plan (Nottinghamshire County Council, 2021) sets out considerations of mineral safeguarding and states that locally and nationally important mineral resources, permitted reserves and allocated sites and infrastructure will be safeguarded from sterilisation by non-mineral development. The policy provides that non-mineral development within safeguarding areas will have to demonstrate that the mineral resources will not be needlessly sterilised and that it would not pose a serious hindrance to future mineral extraction. The policy outlines that where this cannot be demonstrated then prior extraction will be sought where practicable.

Bassetlaw District Council planning policy

6.17.21 Policy 47 (Contaminated and Unstable Land) of the BLP sets out considerations in relation to contamination and land instability.

Neighbourhood planning policy

6.17.22 The following Neighbourhood Plans and policies are relevant to the Project in terms of land use and green infrastructure:

- Misterton Neighbourhood Plan (2024) (Misterton Parish Council, 2024) Policy 2R: Improving Green and Blue Infrastructure and Biodiversity; and
- Walkeringham Neighbourhood Plan (2021) (Walkeringham Neighbourhood Plan Steering Group, 2021) Policy 2: Protecting the Natural Environment and Landscape Character.

Assessment Conclusions

Existing land use

6.17.23 **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** provides an assessment of the potential effects of the Project in relation to existing land uses which includes open space and other green infrastructure, including PRoWs.

6.17.24 The Project has sought to avoid or minimise adverse effects on existing land use and green infrastructure including open space. It has sought to maximise benefits through design, through embedded measures like sensitive routeing and siting of infrastructure and temporary works, and a number of ecological and landscaping measures set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan**. Measures include mitigation planting areas across the Project Order Limits chosen with a view to extend existing habitats, for example woodland areas, and/or provide links between existing areas of habitat.

6.17.25 In addition to the above, the Project commits to control and management measures during construction to minimise potential impacts, as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, **Application Document 7.4 Outline Construction Traffic Management Plan**, **Application Document 7.6 Outline Public Rights of Way Management Plan** and **Application Document 7.2 Outline Code of Construction Practice**. These include (but are not limited to):

- Maintaining access to community facilities, businesses, tourism assets and recreational areas where practicable when they fall within the Order Limits. Where closures are unavoidable, appropriate temporary access arrangements will be provided, including diversions with advance notice signage, ensuring that affected users are clearly informed of changes before and throughout the construction period.
- Avoiding the long term closure of The Yorkshire Wolds Way for users for the duration of construction works associated with the Project, including identification of a short term alternative route, allowing for the installation of a suitable and proportionate crossing protection scaffold following agreement with the local planning authority PRoW officer.

- Managing PRoW diversions and temporary closures in discussion with the relevant local authority. Access disruption will be minimised, where practicable and safe, while construction activities occur. Any required temporary diversions will be clearly marked at both ends with signage explaining the diversion, the duration of the diversion and a contact number for any concerns.

6.17.26 **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** and **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** anticipate that, following the implementation of embedded and control measures, there would be no permanent PRoW closures or diversions as a result of the Project. Any closures and diversions would be temporary in nature and be carried out in accordance with the measures set out in **Application Document 7.6 Outline Public Rights of Way Management Plan**. The diverted routes are anticipated to be primarily used for recreational purposes, with the proposed diversions offering a comparable recreational experience to the existing routes with similar character and amenity value for users. No significant effects on any PRoWs are anticipated during construction, operation and maintenance of the Project.

6.17.27 The assessment concludes that no other recreational land facilities, including open space, are anticipated to experience any significant severance effects during construction and operation (including maintenance) of the Project. In addition, taking into account the residual effect assessment results of the visual, traffic and transport, air quality, and noise and vibration assessments relating to the construction activities, there are no sections of recreational or open space that would experience a significant effect on their amenity.

6.17.28 The Project would result in the change of use or cessation of operation of some recreational unlicensed airfields within 500 m of the Project, resulting in significant effects at Forwood Farm Airfield, Headon Airfield and Darlton Gliding Club. Section 6.15 of this Planning Statement summarises these effects, therefore this is not repeated here.

6.17.29 The Project has sought to avoid or minimise adverse effects on green infrastructure, and maximise benefits through design, and a scheme of mitigation planting across the Project's Order Limits is proposed as set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan (LEMP)**, to extend existing habitats, for example woodland areas, and provide links between existing areas of habitats.

Future land use

6.17.30 **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** identifies existing land uses near the Project, and **Application Document 6.21 Environmental Statement Chapter 21 Inter-project Cumulative Effects** identifies proposed land uses near the Project. The respective chapters consider the potential for the Project to either replace an existing or proposed land use, or prevent a development or use on a neighbouring site from continuing, and any effects as a result of this.

6.17.31 The Project would not result in the prevention of a development or use on a neighbouring site from continuing, as set out in **Application Document 5.11 Interrelationship Document**. This document explains how the Applicant has coordinated the Project with other relevant projects, with a particular focus on the identification and management of physical interfaces – for example where the Project

Order Limits overlap with the order limits or red line boundaries of other projects. It sets out the measures, agreements and protective provisions that will enable projects to work together to manage construction impacts and provide opportunities to co-ordinate.

6.17.32 As set out in **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism**, none of the identified developments or planning applications are expected to experience land-take as a result of the construction of the Project, and no extant planning applications or allocations that are expected to be operational before the commencement of construction of the Project are anticipated to experience any significant severance effects during construction of the Project. Therefore, the Project does not preclude any new development or proposed use (e.g. allocated sites) in any of the relevant development plans.

Minerals

6.17.33 A Preliminary Qualitative Minerals Resource Assessment has been undertaken and is presented within **Application Document 6.12.A3 Environmental Statement Appendix 12.3 Preliminary Qualitative Minerals Resource Assessment** which identifies the minerals resources within the Order Limits and explains why minerals have been scoped out of the ES.

6.17.34 National Grid acknowledges that parts of the study area for the Project assessments are located within Nottinghamshire sand and gravel MSA, North Lincolnshire mineral consultation zone and clay protection area, and MSAs in East Riding of Yorkshire including sand and gravel, salt, brick clay, silica sand, chalk and crushed rock; and that the Order Limits pass through the Wienerberger Ltd clay works.

6.17.35 The Wienerberger Ltd extraction site for brick clay is also located within the study area and National Grid will continue to engage with the mineral operator to discuss potential mitigation if appropriate.

6.17.36 **Application Document 6.12.A3 Environmental Statement Appendix 12.3 Preliminary Qualitative Minerals Resource Assessment** concludes that, even if the full extent of the Order Limits within an MSA were to sterilise mineral of sufficient quality and extent to be economically valuable, the extent of the sterilised area is small in comparison to the extent of the MSA. Therefore, in the context where only a relatively small proportion of the overall Order Limits will sterilise a potential mineral resource, the quantity of mineral that could be sterilised by the Project is considered to be insignificant in the context of the extensive occurrence of the minerals (predominantly sand and gravel) within the counties.

6.17.37 In addition, whilst there are mineral deposits safeguarded within the study area, the existence, extent and quality of such is not proven and is anticipated to be highly variable. Therefore, not all of the safeguarded areas may contain mineral, or mineral of sufficient quality or economical value.

6.17.38 Consideration has been given to prior extraction of minerals as part of the Project. This has shown that there are likely to be only small discrete areas of the Project where material could be excavated due to the linear nature of the proposed overhead line, making it impractical.

6.17.39 Further to the above, the additional time that would be needed to be added to the construction schedule would mean that National Grid could miss the Project's intended delivery date, which could also risk meeting of the government's green

energy targets. Therefore, it is considered that in the context of the additional implications and time required, and the unproven economic value of the small amount of mineral that could be realised, prior/incidental extraction of mineral is not viable.

Contaminated land

6.17.40 **Application Document 6.12 Environmental Statement Chapter 12 Geology and Hydrogeology** sets out the potential effects of the Project on geological and hydrogeological receptors including contaminated land. A contamination preliminary risk assessment has also been undertaken and presented in **Application Document 6.12.A2 Environmental Statement Appendix 12.2 Preliminary Contamination Risk Assessment**.

6.17.41 As set out in **Application Document 7.3 Register of Environmental Actions and Commitments** embedded measures have been intrinsic to the design of the Project to avoid and reduce significant adverse effects. The Project has been designed with sensitive routeing and siting of infrastructure and temporary works to avoid potentially contaminative sites such as landfills, and sensitive features (such as Source Protection Zone 1s) where practicable. Control and management measures are also proposed and set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments** which will be secured by **Application Document 3.1 Draft Development Consent Order**. These include (but are not limited to):

- Intrusive ground investigations and assessment will be undertaken prior to construction, including the measurement and monitoring of groundwater levels, geotechnical and geoenvironmental sampling and testing as appropriate. The information will inform geoenvironmental assessment, where required in accordance with good practice.
- Where specific sites within the Order Limits have been assessed in the ES as presenting a Moderate or above risk to sensitive receptors, these sites will be individually investigated and assessed in accordance with Land Contamination Risk Management prior to construction. This will inform the assessment of the risks to receptors, and good practice measures and working methods to control those risks will be developed. The results will be discussed, and the nature and scope of any mitigation or remediation will be agreed with, the Environment Agency and LPA (as appropriate).
- A protocol for dealing with any unexpected contamination will be developed by the Main Works Contractor(s).

6.17.42 **Application Document 6.12.A2 Environmental Statement Appendix 12.2 Preliminary Contamination Risk Assessment** concludes that the majority of the Order Limits is indicated to have remained as undeveloped/agricultural land since the earliest reviewed historical mapping. Therefore, in these areas, it is considered that there is a very low risk of a significant source of potential contamination. There are discrete areas within the 250 m study area for the Project where either the historical land use or the current land use have been identified as potentially contaminative.

6.17.43 However, following the implementation of embedded and control and management measures proposed in **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.2 Outline Code of Construction Practice**, the Preliminary Contamination Risk Assessment concludes

that there is a low risk of exposure to any existing contamination through ground disturbance. Therefore, it is considered that the temporary construction impacts from exposure to existing contamination for human health receptors, and groundwater and groundwater receptors would result in an overall negligible effect, which would be not significant. As committed to in **Application Document 7.3 Register of Environmental Actions and Commitments**, the Preliminary Contamination Risk Assessment will be reviewed once the detailed design of the Project is available to ensure that the assumptions made within the risk assessment are still valid (i.e. that the Project does not disturb any of the sites identified within the Preliminary Contamination Risk Assessment).

Appraisal

Existing and proposed land use

6.17.44 In accordance with paragraph 5.11.8 of NPS EN-1, **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** identifies existing land uses near the Project, **Application Document 6.21 Environmental Statement Chapter 21 Inter-project Cumulative Effects** identifies proposed land uses near the Project. The effects of replacing an existing or proposed land use with the Project, or preventing a development or use on a neighbouring site from continuing, are set out in the respective chapters.

6.17.45 The Project has been designed from the outset to avoid, where possible, and reduce environmental impacts and impacts on land uses by following the mitigation hierarchy and embedded, control and management and additional mitigation measures have been incorporated into the design of the Project to minimise and avoid, where possible, socio-economic effects. These are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, **Application Document 7.4 Outline Construction Traffic Management Plan**, **Application Document 7.6 Outline Public Rights of Way Management Plan** and **Application Document 7.2 Outline Code of Construction Practice**, all of which will be secured by **Application Document 3.1 Draft Development Consent Order**.

6.17.46 Although the construction of the Project would result in significant effects due to the permanent cessation of operations at Forwood Farm Airfield, elements of operations at Headon Airfield and at Darlton Gliding Club can continue. The affected airfields are currently only used for recreational activities and not for military or defence operations.

6.17.47 The assessment concludes that no recreational land facilities, including open space, are anticipated to experience any significant severance effects during construction and operation (including maintenance) of the Project. In addition, taking into account the residual effect assessment results of the visual, traffic and transport, air quality, and noise and vibration assessments relating to the construction activities, there are no sections of recreational or open space that would experience a significant effect on their amenity.

6.17.48 The Project has sought to avoid or minimise adverse effects on green infrastructure, and maximise benefits through design, and a scheme of mitigation planting across the Project's Order Limits is proposed as set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan**, to extend existing habitats, for example woodland areas, and provide links between existing areas of habitats.

6.17.49 Following completion of construction activities, and during the operation and maintenance of the Project, **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** concludes that there would be no significant adverse effects on any PRoWs.

6.17.50 The Project would not result in the prevention of a development or use on a neighbouring site from continuing, as set out in **Application Document 5.11 Interrelationship Document**. As set out in **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** none of the identified developments or planning applications are expected to experience land-take as a result of the construction of the Project, and no extant planning applications or allocations that are expected to be operational before the commencement of construction of the Project are anticipated to experience any significant severance effects during construction of the Project. Therefore, the Project does not preclude any new development or proposed use (e.g. allocated sites) in any of the relevant development plans.

6.17.51 Therefore, following the implementation of embedded, control and management measures, the Project is in accordance with paragraphs 5.11.1, 5.11.7, 5.11.8, 5.11.17, 5.11.19, 5.11.23 and 24, and 5.11.28 of NPS EN-1, Policy DP3 of the NPPF, and local and neighbourhood policies relating to land use, green infrastructure, open space, minerals and contaminated land.

Contaminated land

6.17.52 In accordance with paragraph 5.11.17 of NPS EN-1, Policy EC5 and Policy ENV6 of the ERYLP, and Policy DS7 of the NLLP, the Preliminary Contamination Risk Assessment has identified a very low/low risk of existing contamination being present within the Order Limits, therefore it is concluded that the Project is located on a site that is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination.

Minerals

6.17.53 Whist it is acknowledged that some temporary sterilisation of some small areas of minerals resources may occur associated with the Project, these resources could become available in the future. The NPPF (Ministry of Housing, Communities and Local Government, 2026) encourages prior extraction of minerals ‘where practical and feasible’, however, **Application Document 6.12.A3 Environmental Statement Appendix 12.3 Preliminary Qualitative Minerals Resource Assessment** indicates that this requirement is not met in relation to the Project as it would not be practical to extract the mineral prior to development.

6.17.54 The Project is considered to be of national significance and, therefore, the need for the Project outweighs the need to safeguard the mineral deposit. Based on the national significance of the Project and that all affected authorities have more than the seven-year land bank of sand and gravel, as required by the NPPF, and sufficient additional safeguarded areas, it is considered that the potential impact of sterilising the small volume associated with the Project is acceptable without further consideration or mitigation.

6.17.55 Based on the assessment carried out in **Application Document 6.12.A3 Environmental Statement Appendix 12.3 Preliminary Qualitative Minerals Resource Assessment** and the conclusions set out above, the Project is in

accordance with paragraph 5.11.19 and 5.11.28 of NPS EN-1, the NPPF, PPG, as well as the relevant local policies relating to mineral safeguarding including Policy EC6 of the East Riding of Yorkshire and Kinston upon Hull Joint Minerals Local Plan, Policy CS32 of the North Lincolnshire Local Development Plan and Policy SP7 of the Nottinghamshire Minerals Local Plan.

6.18 Resource and Waste Management

National Planning Policy Context

NPS EN-1

6.18.1 Paragraphs 5.15.1 to 5.15.3 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) outline that the government's policy on managing waste is intended to protect human health and the environment by producing less waste and using it as a resource wherever possible. Sustainable waste management is implemented through the waste hierarchy for managing waste where feasible in the following order: prevention, reuse, recycle, recovery (e.g. energy recovery) and finally disposal where other options are not available.

6.18.2 Paragraph 5.15.4 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) acknowledges that *'All large infrastructure projects are likely to generate some hazardous and non-hazardous waste'.*

6.18.3 Paragraph 5.15.7 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) requires the applicant to set out *'the arrangements that are proposed for managing any waste produced and prepare a report that sets out the sustainable management of waste and use of resources throughout any relevant demolition, excavation and construction activities'.*

6.18.4 Paragraph 5.15.8 states '*the arrangements described and a report setting out the sustainable management of waste and use of resources should include information on how re-use and recycling will be maximised in addition to the proposed waste recovery and disposal system for all waste generated by the development. They should also include an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation*'.

6.18.5 Paragraph 5.15.13 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) requires the SoS to consider the extent to which the applicant has proposed an effective system for managing hazardous and non-hazardous waste arising in all stages of a proposed development. Paragraph 5.15.14 states that the SoS should be satisfied that:

- *'Any such waste will be properly managed, both on-site and off-site;*
- *The waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area; and*
- *Adequate steps have been taken to give consideration to the circular economy, minimise the volume of waste arisings, and of the volume of waste arisings sent*

for recovery or disposal, except where that is the best overall environmental outcome'.

PPG

6.18.6 PPG: Waste (Ministry of Housing, Communities and Local Government, 2015) Paragraph: 049 Reference ID: 28-049-20141016 requires proposals that are likely to generate significant amounts of waste to include an audit as part of the application that demonstrates waste will be minimised and managed in an appropriate manner during the construction and operation phases.

Local Planning Policy Context

East Riding of Yorkshire Council planning policy

6.18.7 Policy ENV1 (Integrating high quality design) of the ERYLP (East Riding of Yorkshire Council, 2025) supports development where it incorporates arrangements to manage waste.

North Lincolnshire Council planning policy

6.18.8 Policy CS18 (Sustainable Resource Use and Climate Change) of the NLCS (North Lincolnshire Council, 2011) sets out that development should seek to minimise waste where appropriate. Policy CS20 (Sustainable Waste Management) sets out how the council will promote sustainable waste management including the requirement of a Site Waste Management Plan for major development to minimise waste.

Bassetlaw District Council (Nottinghamshire) planning policy

6.18.9 Policy SP1 (Waste prevention and re-use) of the Nottinghamshire and Nottingham Waste Local Plan (Nottinghamshire County Council, Nottingham City Council, 2025) requires all new development to be designed, constructed and operated to minimise the creation of waste.

Appraisal

6.18.10 **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project** sets out the approach taken on the Project to materials and waste. The nature of the Project means that it is difficult to use secondary (reused/recycled) sources during its construction, as this can affect the operation and the design life of the Project. However, National Grid has existing processes in place to obtain materials from sustainable sources and to use recycled materials where these do not compromise the required design standards and operational life of the Project.

6.18.11 Temporary materials, such as aggregate for access routes and site compounds, works cabins, and security fencing, would be required during construction. Where practicable, temporary materials would be sourced from other construction projects within the region and reused at other construction projects after completion of the Project.

6.18.12 **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.2 Outline Code of Construction**

Practice set out that a Site Waste Management Plan (SWMP) will be developed prior to construction. The SWMP will include but not be limited to:

- Waste forecasts;
- How waste will be reduced, re-used, managed and disposed of in accordance with the waste hierarchy;
- Identification of recovery routes; and
- Actual waste figures once work has begun.

6.18.13 **Application Document 7.3 Register of Environmental Actions and Commitments** states that consideration will be given to the guidance in The Definition of Waste: Development Industry Code of Practice (DoWCoP) (Contaminated Land: Applications in Real Environments, 2011). In addition, dedicated waste management areas will be designed to sufficiently accommodate the types and volumes of waste produced and to reduce the environmental risk of storing waste on-site (covered, secured and away from drainage).

6.18.14 As set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, all use and storage of chemicals and fuels is to be undertaken in accordance with Environment Agency guidance and The Control of Pollution (Oil Storage) (England) Regulations 2001 (HM Government, 2001). The use and storage of chemicals and fuels will also be controlled and monitored under the detailed Code of Construction Practice which will include, for example, procedures for good general construction site practices, environmental and waste management procedures, regular vehicle checks, use of spill kits, correct waste storage and disposal, use of oil-water separators as necessary (for example, for drainage from refuelling areas), collection of process water from the washout/cleaning of ready-mix concrete vehicles and equipment for treatment/disposal.

6.19 Water Quality and Resources

National Planning Policy Context

NPS EN-1

6.19.1 Paragraph 5.16.1 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) acknowledges that infrastructure development can have an adverse effect on the water environment, including groundwater, inland surface water, transitional waters, coastal and marine waters. Paragraph 5.16.2 outlines that construction, operation and decommissioning phases can lead to an increase in water demand and new discharges that may result in adverse effects.

6.19.2 Paragraph 5.16.3 states '*where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment, and how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment, as part of the ES or equivalent*'.

6.19.3 Paragraph 5.16.7 sets out that the ES should describe existing qualities of water affected and impacts of the proposed project on water quality; existing water resources affected by the proposed project and the impacts of the proposed project

on water resources; existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project and any impact of physical modifications to these characteristics; any impacts of the proposed project on waterbodies or protected areas; how climate change could impact any of the above in the future; and any cumulative effects.

6.19.4 In terms of mitigation, paragraph 5.16.8 requires the SoS to consider whether mitigation measures are needed over and above those which may form part of the application. Paragraph 5.16.8 also adds that a construction management plan may help codify mitigation at that stage.

6.19.5 Paragraph 5.16.17 states '*the Secretary of State should consider proposals to mitigate adverse effects on the water environment and any enhancement measures put forward by the applicant and whether appropriate requirements should be attached to any development consent and/or planning obligations are necessary*'.

NPPF and PPG

6.19.6 Policy W4 of the NPPF (Ministry of Housing, Communities and Local Government, 2026) requires development to give substantial weight to the benefits of improving water quality and reducing water-borne pollution. Policy P3 requires development proposals to assess and mitigate impacts where the development could have an unacceptable adverse effect on water quality.

6.19.7 PPG: Water supply, wastewater and water quality (Ministry of Housing, Communities and Local Government, 2019) requires consideration of water quality where it has the potential to be a significant planning concern. The PPG requires that the applicant should explain how the proposed development would affect a relevant waterbody in a river basin management plan or designated site of importance for biodiversity, and how they propose to mitigate the impacts.

Marine Planning

East Inshore Marine Plan

6.19.8 Policy ECO2 requires proposals to take account of the risk of hazardous substance releases occurring as a secondary effect due to an increased collision risk. The Plan goes on to explain that '*Risks are likely to be identified and addressed through existing mechanisms, such as environmental assessment, navigational risk assessment, safety measures and contingency plans.*'

Local Planning Policy Context

East Riding of Yorkshire Council planning policy

6.19.9 Policy EC5 (Supporting the renewable and low carbon energy sector) of the ERYLP (East Riding of Yorkshire Council, 2025) requires development and its associated infrastructure to be acceptable in terms of water quality. Policy ENV4 (International, National and Local Sites of Importance for Biodiversity) requires the consideration of water quality impacts on sites for biodiversity.

North Lincolnshire Council planning policy

6.19.10 Policy DS15 (Water Resources) of the NLLP (North Lincolnshire Council, 2003) sets out that development will not be permitted which would adversely affect the quality and quantity of water resources or adversely affect nature conservation, fisheries and amenity.

Bassetlaw District Council planning policy

6.19.11 Policy ST49 (Renewable Energy Generation) sets out that renewable energy schemes will be supported subject to the satisfactory resolution of all site specific and cumulative impacts upon water quality. Policy ST51 (Protecting Water Quality and Management) sets out the criteria that proposals should consider with regard to water quality.

Assessment Conclusions

6.19.12 **Application Document 6.11 Environmental Statement Chapter 11 Water Environment** presents an assessment of the likely significant effects on water quality that could arise as a result of the Project.

6.19.13 The water environment was considered in the early stages of siting, and design and embedded measures have been intrinsic to the design of the Project to reduce and where possible avoid impacts on the water environment. Embedded mitigation measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, which is secured by **Application Document 3.1 Draft Development Consent Order**, and include the following:

- Where possible the design of the temporary haul roads has sought to utilise existing bridges and culverts in order to avoid physical disturbance, impacts on flow regimes and pollution risks.
- Large or sensitive watercourses, for example those designated as main river, and those with WFD status, will be crossed by the temporary haul road using temporary clear span bridges to avoid in-channel works and associated effects.
- Appropriate stand-off distances of 10 m have been applied to watercourses to avoid direct effects where practicable.
- Surface water runoff from construction sites, including haul roads and compounds, as well as from any permanent areas of new impermeable surface would be managed using SuDS techniques appropriate to local conditions.

6.19.14 In addition, measures to control and manage construction impacts are set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments** including ensuring best practice regarding water supply and monitoring, pollution prevention measures and good practice measures relating to river and water crossings. The proposed watercourse crossings for construction access are detailed in **Application Document 6.4.A2 Environmental Statement Appendix 4.2 Indicative Bridge and Culvert Schedule** and the third-party works in **Application Document 6.4.A4 Environmental Statement Appendix 6.4 Indicative Third Party Schedule**. In addition, the haul roads would be put in place in accordance with conditions set out within the consents and permits from the relevant authorities (Environment Agency for main rivers) or in accordance with the protective

provisions for drainage authorities, for works to ordinary watercourses, including Internal Drainage Board drains, as required.

6.19.15 Following the implementation of embedded, control and management measures, **Application Document 6.11 Environmental Statement Chapter 11 Water Environment** concludes that there would be no significant adverse effects on watercourses, water quality and hydromorphology, or sites designated for nature conservation during the construction, operation and maintenance of the Project. There would also be no significant adverse effects in relation to water supply, dilution and transport of wastewater during the construction, operation and maintenance of the Project.

6.19.16 Once the overhead line construction is complete, any associated land drainage would be reinstated, and all temporary watercourse crossings would be removed unless for example, it is replacing an existing crossing structure.

Appraisal

6.19.17 In accordance with NPS EN-1 paragraph 5.16.2 and 5.16.3, an assessment of effects on the water environment, including water quality and resources has been undertaken and is set out in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**. The potential for the Project to compromise objectives established under the Water Framework Directive Regulations has been assessed in **Application Document 7.12 Water Framework Directive Assessment**. The assessment confirms no significant effects are anticipated on water quality and resources as a result of the Project.

6.19.18 In accordance with paragraph 5.16.7 of NPS EN-1, the assessment in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment** sets out the existing quality of local surface waters and their physical characteristics as well as the potential effects of climate change on the water environment. An assessment of the demands of the Project during its construction and operation on local water resources has been prepared and presented in **Application Document 6.11.A2 Environmental Statement Appendix 11.2 Water Resources Assessment**.

6.19.19 As per paragraphs 5.16.8 and 5.16.17 of NPS EN-1, and the PPG, measures to mitigate potential adverse effects on the water environment during construction are included in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.

6.19.20 **Application Document 6.11 Environmental Statement Chapter 11 Water Environment** has provided an assessment of water quality and resources and concludes no significant impacts are anticipated following implementation of mitigation measures. Therefore, the Project is in accordance with the relevant national and local policies contained in NPS EN-1, NPS EN-5, EIMP, NPPF, PPG, and local and neighbourhood plans relating to water quality and resources.

7. Decision-Making and Planning Balance

7.1 Introduction

7.1.1 The determination of this application for development consent will be decided pursuant to section 104 of the Planning Act 2008 (PA 2008). This section sets out the statutory decision-making framework under the PA 2008, conducts a comprehensive planning balance weighing the positive, neutral, and adverse residual impacts of the Project, and methodically applies the CNP policy presumption established under NPS EN-1.

7.2 Section 104(2) of the Planning Act 2008: Regard Had in the SoS's Decision

7.2.1 In making the decision under section 104(3) of the PA 2008, the SoS must have regard to:

- **Any relevant national policy statement (Section 104(2)(a)):** Section 7.3 summarises the Project's compliance with the designated National Policy Statements for Energy: Overarching NPS EN-1 and NPS EN-5 (Electricity Networks Infrastructure), with NPS EN-3 (Renewable Energy Infrastructure) being an important and relevant consideration. Detailed compliance is presented in sections 6 and 7 (this section) of this Planning Statement and **Application Document 5.6 Policy Compliance Document**.
- **The appropriate marine policy documents (Section 104(2)(aa)):** The appropriate marine policy document relevant to the Project is the East Inshore and East Offshore Marine Plans. **Application Document 5.6 Policy Compliance Document** demonstrates that the Project is in accordance with the relevant Marine Plan.
- **Local Impact Reports (Section 104(2)(b)):** Local Impact Reports are expected to be prepared by the host authorities (East Riding of Yorkshire Council, North Lincolnshire Council, Nottinghamshire County Council, Bassetlaw District Council) for the examination of the application. The Project is in accordance with local policy to the extent that it is important and relevant, as demonstrated in **Application Document 5.6 Policy Compliance Document**.
- **Prescribed Matters (Section 104(2)(c)):** It has been demonstrated that a decision to grant a DCO for the Project would have regard to the matters prescribed by Regulations 3 and 7 of The Infrastructure Planning (Decisions) Regulations 2010 (as amended) (HM Government, 2010).
  - In relation to Regulation 3 (listed buildings, conservation areas and scheduled monuments), the proposed Project has regard to preserving heritage assets and their setting as set out in sections 6.4 and 7.3 and Appendix A of this Planning Statement and **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage**.

- In relation to Regulation 7 (biological diversity), biodiversity conservation and enhancement is addressed in sections 6.3 and 7.3 of this Planning Statement and **Application Document 6.8 Environmental Statement Chapter 8 Ecology** and **Application Document 6.9 Environmental Statement Chapter 9 Ornithology**.

- **Other Important and Relevant Matters (Section 104(2)(d)):** This Planning Statement provides evidence of the Project's compliance with the relevant prescribed matters and relevant policy and other matters which National Grid considers are likely to be important and relevant, to inform the SoS's decision as to whether to grant a DCO for the Project. This includes all other material considerations, including NPS EN-5, National Planning Policy Framework (NPPF), relevant development plans and made neighbourhood plans, the Clean Power 2030 Action Plan (HM Government, 2024), advice published by the National Energy System Operator (NESO), and the British Energy Security Strategy.

7.3 Section 104(3) of the Planning Act 2008: Compliance with the Relevant National Policy Statements

Overview

7.3.1 The relevant NPSs in respect of the Project are NPS EN-1 and NPS EN-5. The SoS must therefore decide the application in accordance with these NPSs. Sections 6 and this section of this Planning Statement, as well as **Application Document 5.6 Policy Compliance Document** detail the Project's compliance with these NPSs, and demonstrate that the Project is in accordance with these.

7.3.2 Section 3 of NPS EN-1 sets out the urgent need for significant amounts of new large-scale low carbon energy infrastructure to meet the government's energy objectives, with paragraph 3.2.8 of the NPS EN-1 stating that: '*The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent, as described for each of them in this Part.*'

7.3.3 The Project is defined as an NSIP under s14(1)(b) and s16 of the Planning Act 2008 (HM Government, 2008), as it involves the installation of an electric line above ground of more than 2 km, which will operate at 400 kV in England. Paragraph 3.2.11 of NPS EN-1 therefore states that '*this NPS, along with any technology specific energy NPSs, sets out policy for nationally significant energy infrastructure covered by sections 15-21 of the Planning Act 2008'.*

7.3.4 Paragraph 3.3.65 of NPS EN-1 states that '*There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives.*' Paragraph 3.5.66 follows that '*The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security. The delivery of this important infrastructure also needs to balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts.*'

7.3.5 Paragraph 4.2.16 of NPS EN-1 explains that Government has concluded there is a CNP for the provision of nationally significant low carbon infrastructure. Paragraph 4.2.17 defines the project types for low carbon infrastructure.

7.3.6 NPS EN-1 paragraph 4.2.17 identifies electricity grid infrastructure (all power lines in scope of EN-5 including network reinforcement and upgrade works) as nationally significant low carbon infrastructure. The Project is a new 400 kV transmission connection approximately 90 km in length between a new substation to be built in the vicinity of Birkhill Wood and a new substation at High Marnham, and therefore nationally significant low carbon infrastructure which is of CNP.

7.3.7 In accordance with paragraphs 3.3.65 and 3.3.66 of NPS EN-1, the Project will provide the urgently needed reinforcement to the transmission system in the Humber and East Midlands. Without reinforcement, the capacity of the existing network in the Humber and East Midlands is insufficient to accommodate the connection of proposed new power sources connecting in the area. This reinforcement will ensure that, in accordance with national and local policies and targets, the Project will improve the existing electricity transmission network, and will contribute to the UK's energy independence, decarbonisation requirements and climate change targets, and assist in ensuring the supply of energy remains secure, reliable and affordable.

Non-HRA or non-MCZ impacts: exceptions to CNP presumption

7.3.8 NPS EN-1 paragraph 4.2.28 states that '*Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure*', or in other words, '*it is unlikely that consent will be refused on the basis of these residual impacts*' (Figure 2: Application of CNP in decisions relating to Environmental Impacts Assessments, of NPS EN-1). Paragraph 4.2.28 sets out exceptions to this and states that '*The exception to this presumption of consent are residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, or irreplaceable habitats. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk*'.

7.3.9 The following sections demonstrate that these exceptions do not apply, and the Project does not have an unacceptable risk to, or unacceptable interference with those matters set out in paragraph 4.2.28.

Human health and public safety

7.3.10 **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing** and **Application Document 6.21 Environmental Statement Chapter 21 Inter-Project Cumulative Effects** concludes the Project will not result in significant adverse effects on human health and wellbeing in isolation or cumulatively. Section 6.12 of this Planning Statement provides further details. Matters of public safety and pollution control are also considered where appropriate throughout the ES, including:

- **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**;
- **Application Document 6.15 Environmental Statement Chapter 15 Air Quality**;

- **Application Document 6.12.A2 Environmental Statement Appendix 12.2 Preliminary Contamination Risk Assessment**;
- **Application Document 6.11.A2 Environmental Statement Appendix 11.2 Water Resources Assessment;**
- **Application Document 7.13 Flood Risk Assessment**;
- **Application Document 6.16.A4 Environmental Statement Appendix 16.4 Construction Traffic Noise and Vibration Assessment**;
- **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport**;
- **Application Document 6.15.A2 Environmental Statement Appendix 15.2 Construction Dust Methodology and Assessment**; and
- **Application Document 6.15.A3 Environmental Statement Appendix 15.3 Construction Vehicle Emissions Modelling**.

7.3.11 As set out in **Application Document 6.5.A2 Environmental Statement Appendix 5.2 Scoping Opinion**, it was agreed that the potential for major accidents and disasters as a result of the Project can be mitigated or reduced by the processes and standards in place and that the Project is also unlikely to generate any significant effects on the environment if a major accident or disaster were to occur. This was therefore scoped out of the EIA. As part of the statutory consultation carried out, the Health and Safety Executive (HSE) was consulted with In its response the HSE identified that the Project appears to cross the Consultation Zones of several Major Accident Hazard (MAH) sites and MAH pipelines. The HSE advised that the Applicant should make contact with the operators of MAH sites to inform an assessment of whether or not the Project is vulnerable to a possible major accident. In its response to the HSE, National Grid confirmed that the requirements of the Control of Major Accident Hazards (COMAH) Regulations do not apply to high voltage electricity works of the type proposed as part of the Project; however, National Grid has and continues to consult with the relevant site operators of MAH sites and pipelines.

7.3.12 Management plans are submitted with the application which secure the implementation of measures during construction and operation which would seek to avoid or reduce risks relating to pollution and emissions, including **Application Document 7.2 Outline Code of Construction Practice**, **Application Document 7.3 Register of Environmental Actions and Commitments**, **Application Document 7.4 Outline Construction Traffic Management Plan**, and **Application Document 7.7 Outline Noise and Vibration Management Plan.**

7.3.13 **Application Document 5.3 Statement of Statutory Nuisance** describes the matters that constitute 'statutory nuisances' within section 79(1) of the Environmental Protection Act 1990 and concludes that, following the implementation of the proposed mitigation measures, the temporary residual effects on local amenity and human health are anticipated to be not significant, with no effects identified that would represent a common law or statutory nuisance under section 79(1) of the Environmental Protection Act 1990.

7.3.14 In light of all of the above, the proposed Project would not present an unacceptable risk to human health and public safety.

Defence

7.3.15 As set out in more detail in section 6.15 of this Planning Statement, and in Appendix A Aviation Assessment of **Application Document 5.9 Design Development Report,** consultation with the MOD DIO confirmed that the Order Limits of the Project are partly within the statutory safeguarding zones that surround the East 1 Wide Area Multilateration (WAM) Network which contributes to aviation safety by feeding into the air traffic management system in eastern England. The proposed development area is also within Military Low Flying Area's (LFA) 06 and 11. National Grid has engaged with the MOD DIO by providing detailed project design information including updates to overhead line alignments and indicative pylon heights which allowed for the MOD DIO to assess the potential impacts on the identified assets.

7.3.16 It is not anticipated that the Project would have any significant impacts to the Clarborough to Belmont and the Clarborough to Waddington WAM Microwave Links. It is anticipated that the MOD will specify the need for a requirement to be added to **Application Document 3.1 Draft Development Consent Order** to ensure the proposed overhead line does not physically affect the WAM networks. In addition the Project will provide MOD DIO with information about where crane deployments will occur to maintain the safety of military aircraft engaging in low flying training activities, and provide information on the construction of new pylons and any removal or modifications to the siting of existing pylons so aviation chart data can be updated, in relation to impacts on Military Low Flying Areas. Discussions and technical assessments between National Grid and MOD are continuing with the expectation that there would be no unacceptable risks to or interferences with defence assets as a result of the Project.

Irreplaceable habitats

7.3.17 Section 6.2 of this Planning Statements sets out in detail how the Project has applied the mitigation hierarchy appropriately in designing the Project to avoid as far as possible, adverse effects on irreplaceable habitats. It also explains how the location, routeing and siting of the Project has been designed to avoid impacts on designated ancient woodland and veteran trees as far as practicable.

7.3.18 To summarise the appraisal set out in section 6.2 of this Planning Statement, as the design currently stands and should the LoD not be used in Route Section A, the Project would not result in the loss or deterioration of any designated (on the AWI) ancient woodland or trees, or veteran trees.

7.3.19 It is acknowledged that based on the current design of the Project significant effects are reported on some areas of Woodlands with Characteristics of Ancient Woodland, which would result in the loss or deterioration of irreplaceable habitats at Socken Wood and Wood Farm. Mitigation is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments** to ensure that impacts are reduced as far as practicable, and a compensation strategy that has been developed as far as possible for replacement planting with a ratio of 3:1 is proposed and secured in **Application Document 7.8 Outline Landscape and Ecology Management Plan.**

7.3.20 In the event that the LoD is used and the loss of one veteran tree is required, compensation planting (with a replanting ratio of 30:1) would be implemented as secured in **Application Document 7.3 Register of Environmental Actions and**

Commitments and agreed with Natural England and East Riding of Yorkshire Council.

7.3.21 Mitigation and compensation planting (ratio of 3:1) is also proposed if the Project would result in the loss or deterioration of Woodland with Characteristics of Ancient Woodland within Jillywood Lane LWS (if the LoD are used in this location). These are secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan and Application Document 7.3 Register of Environmental Actions and Commitments**.

7.3.22 Therefore, in accordance with paragraph 5.4.55 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) it is considered that impacts of the Project on irreplaceable habitat are justified on the basis that the following factors together provide wholly exceptional reasons and are sufficient to outweigh the loss or deterioration of the irreplaceable habitat: the urgent and compelling public need and benefits of the Project; the absence of a reasonable alternative route or design capable of avoiding the impacts; and the extent of mitigation embedded into the Project (as set out in sections 3 and 7.5 of this Planning Statement) In addition, relevant compensation strategies have been developed as far as possible, are secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan and Application Document 7.3 Register of Environmental Actions and Commitments**. The compensation strategies will be finalised prior to any impacts arising. Therefore, it is considered that the Project is in accordance with paragraphs 5.4.15 to 5.4.16, 5.4.33 and 5.4.55 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) regarding irreplaceable habitats.

7.3.23 In terms of acceptability as set out in paragraph 4.2.28 of NPS EN-1, it is considered that the loss or deterioration of Woodland with Characteristics of Ancient Woodland (at Socken Wood and Wood Farm) would be relatively limited, and localised, amounting to the loss of approximately 0.51 ha and the management of approximately 0.18 ha of Woodlands with Characteristics of Ancient Woodland. Extensive mitigation is proposed to ensure impacts are limited, including:

- Restricting tree loss to only those essential for the proposed overhead line clearance.
- All affected trees in Socken Wood will be soft felled.
- Where trees are coppiced and/or felled to facilitate the construction of the Project, sufficient trees (quantity agreed with the ArbCoW and ECoW) will be placed within the woodland and/or mitigation planting areas in locations agreed with the ECoW in the form of log piles (and not wood chips).
- For those not used for log piles, these will not be left as woodchip within the woodlands.
- Any trees removed within the area of potential ancient woodland will not be removed to below ground level and not grubbed out to reduce the impact to soil and ground flora.
- No other access will be taken for works through the woodlands to protect ground flora and retained trees.

7.3.24 Additionally, compensation planting proposed for Socken Wood would be immediately adjacent to the woodland, following the lines of a historic woodland previously present in this area, which would not only restore this woodland but also

enhance links to Socken Wood. Compensation planting is also proposed for Wood Farm in proximity to the existing woodland. National Grid has committed to a 3:1 replacement for individual trees and individual trees within small groups which would include replacement planting for Socken Wood and Wood Farm.

7.3.25 It is therefore concluded that the Project would not result in an unacceptable impact to or interference with Socken Wood and Wood Farm Woodland with Characteristic of Ancient Woodland.

7.3.26 Similarly, in the event that the LoD are used, and impacts arise on one veteran tree (T4) and Jillywood Lane LWS, the proposed mitigation to reduce impacts as far as practicable, and proposed compensation strategies are considered sufficient to ensure that the Project would not have an unacceptable impact on or interference with veteran tree (T4) and Jillywood Lane LWS.

Offshore navigation

7.3.27 The Project's interaction with offshore navigation is set out in detail in paragraph 24 of the East Inshore Marine Plan in **Application Document 5.6 Policy Compliance Document**. It sets out that the siting and design of the Project have been developed to avoid interference with the Humber Estuary's busy commercial navigation, port activities, and delicate coastal and estuarine sediment processes. While the Project spans the tidal River Ouse upstream of its confluence with the River Trent (Route Sections A and B), it does not involve any permanent or temporary infrastructure, dredging, or ground disturbance below Mean High Water Springs (MHWS). Pylons 4AF77 and 4AF78 are set back approximately 90 m from the water's edge, maintaining bank integrity and preventing physical interaction with the riverbed.

7.3.28 As set out in **Application Document 7.22 Navigational Risk Assessment** the Project preserves the navigational functions and physical estuarine processes of the Humber Estuary. Therefore, the Project does not have any interference with offshore navigation and will not result in an unacceptable risk to offshore navigation.

Flood and coastal erosion risk:

7.3.29 Section 6.6 of this Planning Statement sets out in detail the impacts of the Project in relation to flood and coastal erosion risk. It, and **Application Document 7.13 Flood Risk Assessment** conclude that the Project is considered to be at low risk of flooding from all sources assessed, due to the mitigation measures built into its design. The Project is not anticipated to increase flood risk elsewhere during its operation as any losses of floodplain storage would be compensated for. The Project would not result in an increase in flood risk elsewhere, and has been designed to be resilient to flooding throughout its lifetime. The Project would not therefore present an unacceptable flood and coastal erosion risk.

Summary

7.3.30 As set out above, none of the exceptions to the presumption of consent set out in paragraph 4.2.28 of NPS EN-1 apply. The presumption in favour of consent for CNP infrastructure is therefore not affected with regard to these exceptions.

HRA or MCZ impacts

7.3.31 As illustrated in Figure 3: Application of CNP in decisions relating to Habitats Regulations Assessments of NPS EN-1, the presumption of consent does not apply

where residual effects relating to an HRA or Marine Conservation Zone (MCZ) are present. In that case, paragraph 4.2.32 of NPS EN-1 states that the SoS will need to consider making a derogation under the Conservation of Habitats and Species Regulations 2017. It is established in **Application Document 5.2 Habitats Regulations Assessment Report** that the Project does not result in any HRA or MCZ residual significant effects. Therefore, there is no need for the SoS to consider making a derogation under the Habitats Regulations and the presumption of consent for CNP infrastructure still stands.

CNP Presumption

7.3.32 Because none of the exemptions in paragraph 4.2.28 are triggered, and the Project does not result in any HRA of MCZ residual significant effects, paragraph 4.2.29 of NPS EN-1 applies. It states that '*the Secretary of State will take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances'.*

7.3.33 Paragraph 4.2.30 explains this further by saying: '*This means that the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests:*

- *Where development within a Green Belt requires very special circumstances to justify development;*
- *Where development within or outside a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs;*
- *Where development in nationally designated landscapes requires exceptional circumstances to be demonstrated; and*
- *Where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.'*

7.3.34 The following points take each of the above tests in turn.

Green Belt

7.3.35 The Project is not located within a Green Belt, and therefore very special circumstances are not required to justify its development.

Sites of Special Scientific Interest (SSSIs)

7.3.36 **Application Document 6.8 Environmental Statement Chapter 8 Ecology** and **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** conclude that there would be no significant adverse impacts on any SSSIs crossed by the Project. As the Project is not likely to have any significant adverse effect on SSSIs, the test is not engaged.

National Landscapes

7.3.37 **Application Document 6.6 Environmental Statement Chapter 6 Landscape** concludes that, following the implementation of the proposed embedded and additional mitigation, there would not be any significant adverse effects on any

designated landscapes, which includes the Yorkshire Wolds Important Landscape Area. Although the Yorkshire Wolds Important Landscape Area is not currently designated as a national landscape, on 4 February 2026, Natural England issued notice of intention to make a designation Order for the proposed Yorkshire Wolds AONB (currently Yorkshire Wolds Important Landscape Area). The Draft Yorkshire Wolds AONB (Designation) Order 2026 (Natural England, 2026) identifies the areas to be designated. At its closest, near Market Weighton, the area proposed for designation is approximately 11.4 km from the Limits of Deviation. At this distance, the special qualities and statutory purposes of the AONB would not be significantly affected by the Project and no further assessment has been undertaken. Therefore, there would be no effects on any National Park, National Landscape or The Broads as a result of the Project, and exceptional circumstances are not required to be demonstrated.

Substantial harm to or loss of significance to *heritage assets*

7.3.38 The Heritage Statement of Harm (Appendix A of this Planning Statement) concludes that the Project would not result in substantial harm to or loss of significance of any heritage assets. In total, the Project would result in harm that is not substantial to 66 heritage assets, which comprises 59 designated heritage assets, six conservation areas and one non-designated asset. Most of this harm is at the lower end of the scale, with nine designated heritage assets and one conservation area at the middle of the scale, and one designated heritage asset (Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190) which is a scheduled monument) at the higher end of the scale. Cultural heritage matters were considered in the early stages of siting and design of the Project and the Project has undergone an iterative design process in order to minimise and avoid, where possible, harm to the historic environment. Embedded mitigation measures have been incorporated into the design to avoid or reduce impacts as far as practicable, as set out in Application Document 7.3 Register of Environmental Actions and Commitments. Although the Project results in significant residual effects to designated heritage assets, there would be no substantial harm to any designated or non-designated heritage assets. It is considered that the overriding public benefits and need for the Project (as outlined in section 3 and 7 of this Planning Statement) would clearly and demonstrably outweigh the significant residual effects and harm that is not substantial to heritage assets.

Summary

7.3.39 Based on the above, compliance with relevant national policy has been demonstrated and the CNP status of the Project outweighs any residual impacts remaining after the mitigation hierarchy has been applied.

7.4 Section 104(3) of the Planning Act 2008: Subsection 3B

7.4.1 Section 104(3) of the PA 2008 directs that the Secretary of State must decide the Application in accordance with the relevant NPSs (EN-1 and EN-5) unless satisfied (as set out in subsection 3B) that one or more of the statutory exceptions set out in subsections 104(4) to 104(8) apply. These subsections are:

- Section 104(4) (International Obligations): Section 104(4) applies if deciding an application in accordance with any relevant national policy statement would lead to the UK being in breach of any of its international obligations. There is no

evidence to suggest that the granting of the DCO for the Project would lead to the UK being in breach of any of its international obligations.

- Section 104(5) (Statutory Duties): Section 104(5) applies if deciding an application in accordance with any relevant national policy statement would lead to the SoS being in breach of any duty imposed on the SoS by or under any enactment. There is no evidence to suggest that the granting of the DCO for the Project would lead to the SoS being in breach of any such duty.
- Section 104(6) (Unlawfulness): Section 104(6) applies if deciding an application in accordance with any relevant national policy statement would be unlawful by virtue of any enactment. There is no evidence to suggest that the granting of the DCO for the Project would be unlawful by virtue of any enactment.
- Section 104(7) (Adverse Impacts vs Benefits): Section 104(7) applies where the Secretary of State is satisfied that the adverse impact of the proposed development would outweigh its benefits. This is discussed in detail in section 7.5 below.
- Section 104(8) (Prescribed Conditions): Section 104(8) applies if any condition prescribed for deciding an application otherwise in accordance with a national policy statement is met. There is no evidence to suggest that any condition is met in relation to the Project.

7.4.2 Based on the above, subsections 104(4), 104(5), 104(6) and 104(8) of the PA 2008 (HM Government, 2008) are not engaged with respect to the Project and therefore, do not apply to the SoS's decision to grant development consent for the proposed Project.

7.5 Section 104(7) of the Planning Act 2008: Planning Balance

7.5.1 In deciding the application in accordance with section 104(3) of the PA 2008 the SoS must determine whether '*the adverse impact of the proposed development would outweigh its benefits*' (section 104(7)). To determine this, a balance of the Project's adverse impacts against its benefits must be carried out. This overall planning balance is presented below.

7.5.2 Paragraph 4.1.5 of NPS EN-1 sets out how the SoS, when making a decision, will weigh any proposed development's '*adverse impacts against its benefits*'. In doing so, the SoS should take into account:

- 'Its potential benefits including its contribution to meeting the need for the Clean Power 2030 Mission and net zero, energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits;
- Its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy.'

7.5.3 The glossary located in NPS EN-1 confirms that in making a decision, the SoS will apply the following ascending hierarchy of weight:

- Limited;

- Moderate;
- Great;
- Significant; and
- Substantial.

7.5.4 The following paragraphs have regard to the outcomes of the planning appraisal in sections 6 and 7 of this Planning Statement with respect to the potential environmental, social and economic impacts of the Project, and apply the planning balancing exercise.

Positive impacts

Net zero and energy security

7.5.5 As set out in section 3 of this Planning Statement, the Project will play an important part in allowing the UK to decarbonise its energy system and to deliver a more secure and resilient energy system.

7.5.6 The existing transmission infrastructure in this area requires reinforcement for the following main reasons:

- The existing transmission network was not designed to transport electricity from where it is increasingly being generated (largely offshore).
- The growth in offshore wind, interconnectors and onshore generation such as battery and solar means that more electricity will be generated in the years ahead than the current network is able to securely and reliably transport.
- In the UK, electricity demand is forecasted to at least double by 2050, increasing the amount of energy we need to transport to homes and businesses.
- Upgrading the existing network as it is today (such as through replacing cables to carry more power) will not be enough to carry the amount of future power whilst operating to required standards.
- An increase in boundary transfer capability would reduce wider network generator constraint costs.

7.5.7 The transmission network in the area of the Project was primarily constructed in the 1960s, at the same time as much of the rest of the transmission system. It was designed to connect the large inland coal-fired power stations in the region, with changes occurring in the later parts of the century connecting gas-fired power stations in the Humber region in particular. Little or no transmission infrastructure was constructed in some areas, so there is currently limited ability to support new connections on the coast.

7.5.8 There has been, and continues to be, growth in the volume of renewable and zero carbon generation that is seeking to connect to the electricity transmission system in the Humber region. The offshore wind developments considered are mainly around Scotland and the East Coast of England, with connections at a number of sites along the east coasts of both Scotland and England. The connections drive the need for local works in the vicinity of the connections, and the need to accommodate increased power flows from the North and East to the Midlands and South. Without

reinforcement, the existing network will not be sufficient to accommodate these new power sources.

7.5.9 With integration into the National Electricity Transmission System of renewables such as offshore wind and interconnectors, an anticipated tripling of wind generation connected across the Scottish networks by 2030, and the Government's increased ambition to connect 50 GW of offshore wind by 2030, north–south power flows are set to increase.

7.5.10 The Project is required particularly to support offshore wind projects which, in turn, are required to meet the Government's targets for the connection of up to 50 GW of offshore wind by 2030. This offshore generation is a key part of a strategy for secure, clean and affordable British energy for the long term. The need for the Project is clear and urgent. See **Application Document 7.17 Strategic Options Report Including Needs Case** for more information on the projects to be served and the need case.

7.5.11 The strategic necessity of the Project is further underscored by persistent geopolitical instability across global energy markets, which has repeatedly exposed the vulnerability of UK households and industry to volatile international fossil fuel supplies and wholesale price shocks. As reaffirmed in recent UK energy policy, notably the UK Government's Clean Energy Superpower Mission, the Clean Power 2030 Action Plan (HM Government, 2024), and the Great British Energy Act, accelerating the delivery of homegrown, low-carbon power is the cornerstone of securing long-term national energy sovereignty and permanently shielding consumers from international fossil fuel price spikes. Both the Clean Power 2030 Action Plan and advice published by the National Energy System Operator (NESO) emphasize that renewable generation cannot achieve these goals in isolation; Britain's energy system requires building around twice as much new electricity transmission infrastructure by 2030 as has been delivered in the past decade.

7.5.12 By resolving critical transmission boundary bottlenecks between the Humber and East Midlands, the Project unlocks the delivery of up to 50 GW of connected offshore wind and low-carbon power, ensuring abundant, low-cost electricity is efficiently transferred directly to major demand centres rather than constrained off the network. Addressing these physical boundary constraints is essential to reducing escalating network curtailment and balancing costs, which are directly recovered through consumer electricity bills, while simultaneously reinforcing whole-system operability and resilience against external supply disruptions. The delivery of this linear reinforcement is therefore vital to guaranteeing a self-reliant, affordable, and secure supply of power for domestic and commercial users alike, in direct accordance with the British Energy Security Strategy, the Clean Power 2030 Action Plan, and the Critical National Priority (CNP) policy provisions set out in Section 4.2 of NPS EN-1.

7.5.13 The Project is regarded by NPS EN-1 (Department for Energy Security and Net Zero, 2025) as nationally significant low carbon infrastructure which is of CNP. The Project will provide the urgently needed reinforcement to the transmission system in the Humber and East Midlands. Without reinforcement, the capacity of the existing network in the Humber and East Midlands is insufficient to accommodate the connection of proposed new power sources connecting in the area. In accordance with national and local policies and targets, the Project will provide this reinforcement, improving the existing electricity transmission network, and will contribute to energy independence decarbonisation requirements and climate change targets, and assist in ensuring the supply of energy remains secure, reliable and affordable.

7.5.14 This important contribution of the Project towards meeting the target of net zero emissions by 2050 and providing energy security is considered a **substantial positive weight** in the planning balance.

Employment generation and the economy

7.5.15 Following the implementation of embedded, control and management, and additional mitigation measures, **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** concludes that the Project would have a beneficial effect on construction employment within a 60-minute Drive Time Area of the Project, during the construction period. This is because the Project will support, on average, 284 total net jobs per annum during the construction period. Of these, 57 jobs per annum are expected to be occupied by residents within the 60-minute Drive Time Area of the Project.

7.5.16 **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** estimates that, taking into account the average gross value added (GVA) per construction worker being £93,336 in Yorkshire and the Humber, and £121,351 in the East Midlands (Office for National Statistics, 2023), the construction of the Project will contribute approximately £39.9 million to the national economy, of which £8 million would likely be within the 60-minute Drive Time Area. This is a beneficial effect.

7.5.17 It is also concluded in **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing** that there would be a minor beneficial human health effect in relation to employment and income, and education and training during construction. This is due to the requirement for construction workers from the local area and the commitment made by National Grid to preparing an Employment, Skills and Education Strategy before the commencement of works, as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**.

7.5.18 These benefits should be afforded **limited positive weight** in the planning balance.

Green Infrastructure and Biodiversity Net Gain

7.5.19 The Project has, in the first instance sought to avoid or minimise adverse effects on green infrastructure, and maximise benefits through design, and a scheme of mitigation planting across the Project's Order Limits is proposed as set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan**, to extend existing habitats, for example woodland areas, and provide links between existing areas of habitats. Along the proposed overhead line, 60 landscape mitigation planting areas have been identified within the Order Limits to provide landscape and visual mitigation, whilst also delivering ecological benefits. Indicative landscape proposals for each of these areas are shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.

7.5.20 The Environment Act 2021 introduces a mandatory requirement for 10% BNG for new NSIP's consented through a DCO under the PA 2008, from November 2026. The Project is anticipated to be submitted in October 2026 and therefore prior to the BNG mandatory requirement for NSIP applications. Despite BNG not yet being a mandatory requirement for NSIPs, National Grid has also committed to deliver 10% BNG with potential for wider environmental and societal benefits on all construction projects requiring formal planning or consent, including the Project.

7.5.21 **Application Document 7.1 Biodiversity Net Gain Report** concludes that the Project would achieve at least 10% BNG, which should be afforded **limited positive weight** in the planning balance. The Project would require an additional 436.72 area habitat units, 70.46 hedgerow units and 12.65 watercourse units, which the Project proposes to address primarily through off-site habitat creation which will be secured through the purchase and allocation of registered off-site biodiversity units from suitably qualified biodiversity unit providers.

7.5.22 National Grid is also exploring opportunities to deliver BNG through habitat creation and enhancement within the Order Limits, and adjacent to Treswell Wood. A 12.17-hectare area (the BNG Opportunity Area) has been identified as a potential on-site BNG mitigation location, although acquisition and use for BNG are not yet confirmed. High-level optioneering indicates a feasible habitat creation strategy focused on 'other woodland; broadleaved' targeting moderate condition, which would be coherent with the surrounding ancient-semi-natural woodland context and support landscape-scale connectivity goals. Strategically, the proposed woodland creation would contribute to local biodiversity priorities for hazel dormouse (*Muscardinus avellanarius*) as set out in the Nottinghamshire and Nottingham Local Nature Recovery Strategy, achieving High strategic significance. Functionally, the habitat would extend the existing Treswell Wood assemblage and strengthen ecological networks across the local landscape, improving permeability and resilience for woodland-associated species.

7.5.23 The balance between on-site and off-site delivery will be developed as the Project design and the BNG assessment develop through detailed design. The delivery strategy will seek to maximise ecological outcomes, long-term deliverability and security of outcomes, alignment with relevant Local Nature Recovery Strategies, and value for consumers.

7.5.24 The delivery of BNG will be secured through the relevant DCO requirement at set out in **Application Document 3.1 Draft Development Consent Order**, legal agreements and contractual arrangements, as appropriate, and will be implemented in accordance with the applicable consent requirements before the Project becomes operational.

7.5.25 This should be afforded **limited to moderate weight** in the planning balance.

Neutral impacts

Air quality

7.5.26 As set out in **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** and **Application Document 6.15.A2 Environmental Statement Appendix 15.2 Construction Dust Methodology Assessment**, following the implementation of mitigation measures there will be no significant residual adverse effects on air quality, therefore this matter should be afforded **limited weight** in the planning balance.

Climate change

7.5.27 The climate change assessment in **Application Document 6.19 Environmental Statement Chapter 19 Climate Change**, **Application Document 6.19.A2 Environmental Statement Appendix 19.2 Climate Change Risk Assessment**, **Application Document 6.19.A3 Environmental Statement Appendix 19.3 In-**

Combination Climate Change Impact Assessment, and **Application Document 6.19.A4 Environmental Statement Appendix 19.4 Greenhouse Gas Reduction Strategy** confirm there will be no significant residual adverse effects on climate change. Therefore, this matter should be afforded **limited weight** in the planning balance.

Flood risk

7.5.28 As set out in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment** and **Application 7.13 Flood Risk Assessment**, there will be no significant residual adverse effects on flood risk. The Project would not result in an increase in flood risk elsewhere, and has been designed to be resilient to flooding throughout its lifetime. Therefore, this matter should be afforded **limited weight** in the planning balance.

Dust, odour, artificial light, smoke, steam and insect infestation

7.5.29 There will be no significant residual adverse effects as a result of dust, odour, artificial light, smoke, steam and insect infestation, therefore these matters should be afforded **limited weight** in the planning balance.

Land use and open space

7.5.30 As set out in **Application Document 6.12 Environmental Statement Chapter 12** and **Application Document 6.12.A2 Environmental Statement Appendix 12.2 Preliminary Contamination Assessment**, there will be no significant residual adverse effects in relation to contamination.

7.5.31 As set out in **Application Document 6.17 Environmental Statement Chapter 17 Socio-economic, Recreation and Tourism,** there would be no significant residual adverse effects in relation to recreational or open space.

7.5.32 The Project would not result in the prevention of a development or use on a neighbouring site from continuing. None of the identified developments or planning applications are expected to experience land-take as a result of the construction of the Project, and no extant planning applications or allocations that are expected to be operational before the commencement of construction of the Project are anticipated to experience any significant severance effects during construction of the Project. Therefore, the Project does not preclude any new development or proposed use (e.g. allocated sites) in any of the relevant development plans.

7.5.33 Whist it is acknowledged that some temporary sterilisation of some small areas of minerals resources may occur associated with the Project, these resources could become available in the future. The Project is considered to be of national significance and, therefore, the need for the Project outweighs the need to safeguard the mineral deposit. Based on the national significance of the Project and that all affected authorities have more than the seven-year land bank of sand and gravel, as required by the NPPF, and sufficient additional safeguarded areas, it is considered that the potential impact of sterilising the small volume associated with the Project is acceptable without further consideration or mitigation.

7.5.34 Therefore, this matter should be afforded **limited weight** in the planning balance.

Noise and vibration

7.5.35 As set out in **Application Document 6.16 Application Document Chapter 16 Noise and Vibration**, **Application Document 6.16.A4 Environmental Statement Appendix 16.4 Construction Traffic Noise and Vibration Assessment**, and **Application Document 6.16.A5 Environmental Statement Appendix 16.5 Operational Overhead Line Noise Assessment**, there will be no significant residual adverse effects on noise and vibration, therefore these matters should be afforded **limited weight** in the planning balance.

Health and wellbeing

7.5.36 **Application Document 6.18 Environmental Statement Chapter 18** sets out that there will be no significant residual adverse effects on health and wellbeing, therefore these matters should be afforded **limited weight** in the planning balance.

Traffic and transport

7.5.37 As set out in **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport**, **Application Document 6.14.A6 Environmental Statement Appendix 14.6 Navigational Risk Assessment**, and **Application Document 7.15 Transport Assessment**, there will be no significant residual adverse effects on traffic and transport, and navigation therefore these matters should be afforded **limited weight** in the planning balance.

Water quality and resources

7.5.38 As set out in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment** and **Application Document 6.11.A2 Environmental Statement Appendix 6.11 Water Resources Assessment**, there will be no significant residual adverse effects on water quality and resources, therefore these matters should be afforded **limited weight** in the planning balance.

Negative impacts

Ecology

7.5.39 Following the implementation of embedded, control and additional mitigation measures, **Application Document 6.8 Environmental Statement Chapter 8 Ecology** and **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** conclude that the Project, based on the current design as set out in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project,** avoids significant adverse impacts on all international and national and local statutory designated sites for nature conservation including SSSIs, non-statutory designated sites, priority habitats, important hedgerows and other terrestrial habitats, protected species and other species, including all bird species. This has been achieved by following the mitigation hierarchy with the design process, and in accordance with the Holford Rules, to avoid impacts where possible.

7.5.40 Significant adverse effects are reported on two areas of Woodland with Characteristics of Ancient Woodland (Socken Wood and Wood Farm) as a result of the Project. In addition, if the LoD is used, there is the potential for a significant effect on one veteran tree (T4) (due to its loss) and a significant effect on Jillywood Lane LWS.

7.5.41 Sections 6.2 and 7.3 of this Planning Statement set out these effects and the Project compliance with policy in more detail.

7.5.42 To summarise, the Project has applied the mitigation hierarchy appropriately in designing the Project, and the location, routeing and siting of the Project has been designed to avoid impacts on designated ancient woodland and veteran trees as far as practicable as demonstrated in **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered**, **Application Document 7.17 Strategic Options Report Including Needs Case**, and **Application Document 5.9 Design Development Report**. Residual significant adverse impacts resulting in the loss or deterioration of Woodland with Characteristics of Ancient Woodland (Socken Wood and Wood Farm) are mitigated and a compensation strategy that has been developed as far as possible is proposed and secured in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**. Potential residual significant adverse impacts on one veteran tree (T4) and Jillywood Lane LWS (if the LoD are used) are also mitigated and a compensation strategy which has been developed as far as possible, is proposed and secured.

7.5.43 The Project is classed as CNP infrastructure, and it is considered that impacts of the Project on irreplaceable habitat are justified on the basis that the following factors together provide wholly exceptional reasons and are sufficient to outweigh the loss or deterioration: the urgent and compelling public need and benefits of the Project; the absence of a reasonable alternative route or design capable of avoiding the impacts; and the extent of mitigation embedded into the Project (set out in sections 3 and 7.5 of this Planning Statement).

7.5.44 Therefore, this should be afforded **moderate negative weight** in the planning balance.

Civil and military aviation and defence interests

7.5.45 **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** concludes that as worst case scenario, three out of the eight unlicensed aerodromes located within 500 m of the Project are anticipated to experience significant adverse impacts on commercial operations and recreational use due to the construction of the proposed overhead line as discussed above. These aerodromes are Forwood Farm Airfield, Headon Airfield, and Darlton Gliding Club. Although significant adverse effects are expected, two of these airfields can continue their use, with only one airfield needing to permanently cease operations. No significant effects are reported on the remaining aerodromes. The affected airfields are currently only used for recreational activities and not for military or defence operations.

7.5.46 In addition, a high level assessment was undertaken on four additional aerodromes located further away from the Project, including Retford/Gamston Aerodrome, Humberside International Airport, Sandtoft Aerodrome, and Doncaster Sheffield Airport. However, no conflict exists between them and the Project.

7.5.47 As set out in Appendix A Aviation Assessment of **Application Document 5.9 Design Development Report***, c*onsultation with the MOD Defence Infrastructure Organisation (DIO) confirmed that the proposed development area of the Project occupies the statutory safeguarding zones that surround the East 1 Wide Area Multilateration (WAM) Network which contributes to aviation safety by feeding into

the air traffic management system in eastern England. The proposed development area is also within Military Low Flying Areas (LFA) 06 and 11.

7.5.48 National Grid will provide MOD DIO with information on the construction of new pylons and any removal or modifications to the siting of existing pylons so aviation chart data can be updated, as well as information about where crane deployments will occur to maintain the safety of military aircraft engaging in low flying training activities at Military LFAs 06 and 11 as requested by the MOD DIO.

7.5.49 It is not anticipated that the Project would have any significant impacts to the Clarborough to Belmont and the Clarborough to Waddington WAM Microwave Links. It is anticipated that the MOD will specify the need for a requirement to be added to **Application Document 3.1 Draft Development Consent Order** to ensure the proposed overhead line does not physically affect the WAM networks. Discussions and technical assessments between National Grid and MOD are continuing with the expectation that there would be no unacceptable risks to or interferences with defence assets as a result of the Project.

7.5.50 Appendix A Aviation Assessment of **Application Document 5.9 Design Development Report** concludes that the introduction of the Project would not result in an increase in the population size of birds, no unacceptable adverse impacts would arise relating to EMF's and there would be evidence of electricity pylons causing wind turbulence effects on aircraft.

7.5.51 Therefore, this should be afforded **limited negative weight** in the planning balance.

Cultural heritage

7.5.52 In accordance with the statutory tests outlined in the Infrastructure Planning (Decisions) Regulations 2010 (HM Government, 2010), the SoS, when making a decision on an application which affects or is likely to affect certain designated heritage assets or their setting, is required to have regard to the desirability of preserving those heritage assets or their setting.

7.5.53 National Grid has undertaken an iterative design process taking account of policy requirements, historic landscape character assessments and desk-based and fieldwork analysis in order to minimise and avoid, where possible, harm to the historic environment. In accordance with the mitigation hierarchy, the design of the Project has sought to avoid, reduce or mitigate potentially significant adverse effects on designated and non-designated heritage assets. Design decisions have been made to balance the need to avoid and reduce impacts on heritage assets, along with other environmental, social and operational considerations. Embedded mitigation measures are also incorporated into the design to minimise impacts as far as practicable, as secured in **Application Document 7.3 Register of Environmental Actions and Commitments.**

7.5.54 Measures relevant to the control and management of impacts to the historic environment during construction have been included within **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**. Further measures relevant to archaeology are set out within **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**, with archaeological works and management measures during the construction, operation and maintenance phases secured through **Application Document 7.10 Outline Cultural Heritage Management Plan**.

7.5.55 **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** concludes that the Project would result in residual significant adverse effects on the setting of 28 designated heritage assets. There would be no residual significant adverse effects on any non-designated assets following the implementation of mitigation measures.

7.5.56 The Heritage Statement of Harm (Appendix A of this Planning Statement) concludes that in total, the Project would result in harm that is not substantial to 66 heritage assets, which comprises 59 designated heritage assets, six conservation areas and one non-designated asset. Most of this harm is at the lower end of the scale, with nine designated heritage assets and one conservation area at the middle of the scale, and one designated heritage asset (Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190) which is a scheduled monument) at the higher end of the scale. The Project would not result in substantial harm to any designated or non-designated heritage assets.

7.5.57 With regard to harm that is not substantial at the higher end of the scale for Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190), it was acknowledged during the routeing and siting exercise in in **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** that the preferred alignment would adversely affect the setting of the Hall Garth Moated site. This harm was deemed to be unavoidable, due to the need to avoid the significant and number of potential impacts of alternative routes in this location, including effects on the nationally and internationally designated nature conservation sites of the Humber Estuary and the protected and qualifying bird species at RSPB Blacktoft Sands Nature Reserve, as well as impacts to Grade II listed buildings, residential properties in Ousefleet and in proximity to an eastern route, Ousefleet Village Hall and playing field, agricultural practices and potential further complexities of additional line swaps.

7.5.58 Although the Project results in significant effects to designated heritage assets, there would be no substantial harm to any designated or non-designated heritage assets. It is considered that the overriding public benefits and need for the Project (as outlined in section 3 and 7 of this Planning Statement) would clearly and demonstrably outweigh the residual significant effects and harm that is not substantial to heritage assets.

7.5.59 Therefore, this should be afforded **moderate negative weight** in the planning balance.

Landscape and visual

7.5.60 **Application Document 6.6 Environmental Statement Chapter 6 Landscape** concludes that the Project would result in significant adverse landscape effects at Operation Year 15 on two landscape character types as a result of the proposed overhead line: Flat Drained Farmland LCT (in Route Section C) and RLCT 4a: Unwooded Vales (in Route section E and F).

7.5.61 In addition, **Application Document 6.7 Environmental Statement Chapter 7 Visual** concludes that while there are significant visual impacts on communities and recreational facilities, these are localised to where the proposed overhead line would be located, and mainly within 200 m or 300 m of the relevant receptor.

7.5.62 There would be no effects on any National Park, The Broads or National Landscape as a result of the Project.

7.5.63 As set out in **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**, embedded measures that are intrinsic to and built into the design of the Project have been incorporated from the outset to reduce, and where possible avoid, landscape and visual impacts as far as practicable, as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, and **Application Document 7.8 Outline Landscape and Ecology Management Plan**, which will be secured by **Application Document 3.1 Draft Development Consent Order**.

7.5.64 Whilst the Project will result in some significant adverse impacts during construction and operation, much of the surrounding landscape is influenced by existing overhead line infrastructure. The Project has been designed to sit in parallel with this infrastructure to minimise the extent of the change, where possible. Therefore, the majority of the proposed overhead line would be seen in the context of existing overhead lines, thereby containing the spread of infrastructure.

7.5.65 The scale and impacts of energy projects on the landscape, and visually, is acknowledged in paragraph 5.10.35 of NPS EN-1 which indicates that '*the scale of energy projects means that they will often be visible across a very wide area'.* Paragraph 5.10.35 states that '*the Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project'*. Overall, the substantial public benefits and need for the Project, as set out in section 3, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives and carbon reduction commitments, clearly and demonstrably outweigh the localised adverse impacts to the landscape and visual amenity set out in **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**.

7.5.66 Therefore, **limited to moderate negative weight** should be afforded in the planning balance.

Agriculture and soils

7.5.67 As set out in **Application Document 6.13 Environmental Statement Chapter 13 Agriculture and Soils** there would be a temporary loss of 1,050.39 ha BMV land from agricultural production during construction, and effects to the ecosystem services that soils provide over an area of up to approximately 1617.20 ha. Effective mitigation measures are set out within **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.5 Outline Soil Management Plan** for soil handling, storage and reinstatement which would reduce effects on soils. All land required (including areas where soils have been disturbed) temporarily would be reinstated by the end of the construction phase.

7.5.68 Following the implementation of embedded, control and management measures, there would be a permanent removal of 34.4 ha of BMV land as a result of the operation and maintenance of the Project. Although some of this includes land for the new-build pylon footings across the route, much of the land is required for environmental and ecological mitigation, and areas for veteran tree compensation, mitigation planting, BNG mitigation and flood compensation. While those areas used for mitigation purposes are no longer in agricultural use during the operation of the

Project, there may be potential benefits as a result of such changes in terms of soil health and soil function.

7.5.69 This should be afforded **limited negative weight** in the planning balance.

Socio-economic

7.5.70 **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** concludes that, following completion of the construction period, there would be no significant adverse effects in relation to businesses, communities, tourism or recreational receptors during the operation and maintenance of the Project.

7.5.71 However, the construction of the Project will result in significant adverse effects on some residential properties, businesses and recreational aerodromes.

7.5.72 Significant effects during construction on five residential receptors (along Cornley Road) and five businesses (Misterton Christian Centre, Beetroot UK, Sunflower Lodge, Newlands Equestrian and Epworth Fields Holiday Park) are due to road closures necessary for the construction of the Project. Mitigation is proposed for all road closures as set out in **Application Document 7.4 Outline Construction Traffic Management Plan**, including a working hours restriction providing morning, evening and weekend vehicle access, and measures specific to each business. Emergency vehicle and pedestrian access will be maintained at all times, as secured through the relevant commitment in **Application Document 7.3 Register of Environmental Actions and Commitments**. These impacts would be temporary, and access would return to normal following the completion of the construction works at each road.

7.5.73 Significant effects are also reported in relation to three aerodromes, as set out in section 6.15 of this Planning Statement. Although the construction of the Project would result in significant adverse impacts on three unlicensed aerodromes, two of these can continue their use, with only one airfield needing to permanently cease operations, as a worst case scenario. The affected airfields are currently only used for recreational activities and not for military or defence operations.

7.5.74 Therefore, this should be afforded **limited negative weight** in the planning balance.

Cumulative

7.5.75 **Application Document 6.20 Environmental Statement Chapter 20 Intra-project Cumulative Effects** assesses intra-project cumulative effects of the Project, to analyse if there are multiple effects on individual receptors. It concludes that one residential receptor (R_2150) in Ousefleet in Twin Rivers community would experience significant intra-project cumulative effects during operation, as a worst-case scenario, only if the LoD are used and the proposed overhead line is on the edge of the LoD and in wet conditions. Groups of residential receptors in 9 communities, transport users on 5 PARs, and 10 PRoWs, Rights of Navigation and other accesses would experience significant intra-project cumulative effects during construction due to interactions between effects such as visual, noise, severance and recreation and amenity. These effects would only arise during the construction period and would therefore be temporary.

7.5.76 **Application Document 6.21 Environmental Statement Chapter 21 Inter-project Cumulative Effects** concludes that, following the implementation of embedded mitigation measures, no significant adverse residual inter-project cumulative effects

are anticipated in relation to ecology, ornithology, water environment, geology and hydrogeology, traffic and transport, air quality, noise and vibration and health and wellbeing, as a result of the construction and operation of the Project, alongside other developments.

7.5.77 Significant adverse residual inter-project cumulative effects are anticipated for the following:

- Landscape and visual receptors during construction and operation due to the introduction of the Project alongside large scale solar, wind and carbon capture projects;
- Agriculture and soil due to the permanent loss of BMV land; and
- Designated heritage asset Risby Jacobean gardens, hall and medieval settlement remains scheduled monument (NHLE 1018600).

7.5.78 The benefits of the Project are substantial in terms of its contribution to the transition to net zero and the urgently needed reinforcement to the transmission system in the Humber and East Midlands, as well as the minor benefit of the creation of jobs during the construction of the Project, and it is considered that the need and benefits clearly outweigh its adverse cumulative impacts.

7.5.79 Therefore, cumulative effects should be afforded **limited to moderate negative weight** in the planning balance.

7.6 Conclusion

7.6.1 The location and design of the Project is the result of a comprehensive site selection process that was led by the consideration of good design and key environmental and planning constraints to avoid and minimise impacts as early as possible. The lengthy design and refinement process has been subject to considerable stakeholder engagement and public consultation, ongoing assessments and design work.

7.6.2 That process has sought to avoid, in the first place, adverse impacts arising as far as that is reasonable or practicable given the need to deliver a successful project which meets the Project's objectives. Where it has not been possible to avoid impacts arising, National Grid has sought to minimise and mitigate those impacts through a range of measures either embedded into the Project design or delivered as standalone mitigation measures. Where it has not been possible to satisfactorily mitigate impacts then compensatory measures have been proposed as far as possible.

7.6.3 This Planning Statement has demonstrated that the Project is in accordance with NPS EN-1 and NPS EN-5. Paragraph 4.1.3 of NPS EN-1 sets out a presumption in favour of granting consent for energy NSIPs subject to the exceptions set out in paragraph 4.2.28. There is also a presumption that the urgent need for CNP infrastructure, such as the Project, will *in general* '*outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy*' (paragraph 3.3.63). The Project will help meet the urgent need for CNP infrastructure to meet '*energy objectives, together with the national security, economic, commercial, and net zero benefits*' (paragraph 3.3.63 of NPS EN-1 (Department for Energy Security and Net Zero, 2025)).

7.6.4 None of the limited exceptions in paragraph 4.2.28 of NPS EN-1, and section 104(4)-(8) of the PA 2008 apply to the decision to be made by the SoS in respect of granting development consent for the Project.

7.6.5 As identified in national policy and the Government's energy strategy, there is an urgent and critical need to bring forward low carbon infrastructure to meet targets for decarbonisation and net zero. The Project will contribute to the delivery of these policy aims, by improving the existing electricity transmission network to accommodate the connection of proposed new power sources in the Humber and East Midlands.

7.6.6 The nature of long linear projects means that it is nearly impossible to avoid key constraints entirely. Routeing often needs to balance competing constraints to arrive at an overall preferred solution that may well still have significant effects, but these are by exception.

7.6.7 The adverse impacts during operation that should be afforded weight against the Project relate to significant effects amounting to the loss or deterioration of Woodland with Characteristics of Ancient Woodland based on the current Project design, as well as potential significant effects on Jillywood Lane LWS and one veteran tree (if the LoD are used), harm that is not substantial to heritage assets, localised significant effects upon landscape and visual receptors, loss of BMV land, and intra- and inter-project cumulative effects. Significant adverse effects are also expected during construction, but these will be temporary. These impacts are significantly outweighed by the very substantial public interest benefits of the Project. The extent of residual effects is limited given the nature of the Project and the principle that all NSIPs will result in significant adverse effects.

7.6.8 It is clear that there is a compelling case and established need for the Project and that it will deliver national economic, social and environmental benefits in line with the Government's clear objectives of delivering sustainable development. The Project will also deliver other more localised socio-economic and environmental benefits. These include employment generation and benefits to the economy during construction, and the provision of at least 10% BNG.

7.6.9 The analysis of planning policy compliance demonstrates that the need for the Project is supported by national planning policy and other national energy and environmental policy, and that the Project addresses relevant national, marine and local planning policies through its design, avoiding sensitive areas and limiting adverse impacts where practicable.

7.6.10 In terms of the overall planning balance, the clear and substantial benefits of the Project clearly outweigh any adverse impacts. The presumption in favour of consent in NPS EN-1 sets out that these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure and that any tests set out in the NPS or other planning policy are to be treated as if they have been met.

7.6.11 This Planning Statement has demonstrated that the Project is in accordance with the relevant national policy statements and local policy considered to be important and relevant; and that substantial weight should be given to need when considering applications for consent under the PA 2008. Given the above, there is a clear and compelling case for the North Humber to High Marnham DCO to be made.

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Appendix A
Statement of Harm

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Appendix A
Statement of Harm

A.1.1 Legislation and national planning policy relevant to the determination of the DCO application identifies the need to present an assessment of harm to heritage assets affected by the Proposed Project, and to consider this in the decision as to whether to grant a DCO. The national policy statements relevant to the harm assessment are presented in Section 2.3 and 2.4 of the Planning Statement and are not duplicated here.

A.1.2 In compliance with relevant legislation and policy, this statement sets out the assessment of harm that the Proposed Project may have on designated heritage assets, and non-designated terrestrial heritage assets where the EIA has identified a level of impact that might result in harm. This statement is then used in the planning balance relating to the cultural heritage national planning policy tests set out in Section 6.4 of this Planning Statement.

A.1.3 The impact assessments relating to cultural heritage matters carried out as part of the EIA are presented in **Application Document 6.10 Chapter 10 Cultural Heritage**. The assessments of impact are not repeated here but are relevant to determining the degree of harm to heritage assets. This Appendix should therefore be read in conjunction with **Application Document 6.10 Chapter 10 Cultural Heritage** and its supporting technical appendices.

A.1.4 Table A.1 includes all designated assets, and non-designated assets of potential national importance, where a likely magnitude of impact has been identified in **Application Document 6.10 Chapter 10 Cultural Heritage**. The magnitude of impact and residual effect, together with the narrative assessment of the source of the impact, presented in **Application Document 6.10 Chapter 10 Cultural Heritage**, are used to define a degree of harm. This uses professional judgement and is guided by relevant national policy and case law.

A.1.5 With regard to determining whether the impact to an asset results in a level of harm that would be interpreted as 'substantial', policy HE5.2(c) of the National Planning Policy Framework (NPPF) published in August 2026 (Ministry of Housing, Communities & Local Government, 2026) provides a definition of substantial harm as arising where a development proposal will 'seriously affect a key element of the asset's significance'. This definition is also contained within Planning Practice Guidance (PPG) for Historic Environment (Ministry of Housing, Communities & Local Government, 2019). In considering whether a predicted impact gives rise to the serious degree of harm to an asset's significance required to constitute substantial harm for the purposes of NPS EN-1, the NPPF and PPG, regard has been had to case law, in particular *Bedford Borough Council v Secretary of State for Communities and Local Government* (2013) EWCH 2847 (Admin) and *London Historic Parks and Gardens Trust v Minister of State for Housing* [2022] EWHC 829 (Admin). The NPPF was updated at a later stage in the preparation of this document, but it is considered that it has not changed the threshold for substantial harm.

A.1.6 Assets that are predicted to experience no impact and no effect from the Project during construction, operation and maintenance are not included and they would experience no effect to their significance as a result of the Project.

Table A.1 – Statement of Harm

Asset ID	Designation	Name	Value	Construction impact and residual effect	Operational impact and residual effect	Degree of harm
1007731	Scheduled monument	Bowl Barrow North of Highfield House	High	Negligible impact Negligible adverse effect	Negligible impact Negligible adverse effect	Harm at the lower end of the scale
1018600	Scheduled monument	Risby Jacobean gardens, hall and medieval settlement remains	High	Small impact Moderate adverse effect	Small impact Moderate adverse effect	Harm at the lower end of the scale
1161824	Grade II listed building	Rowley Manor	Medium	Small impact Minor adverse effect	Medium impact Moderate adverse effect	Harm at the at the lower end of the scale
1001419	Grade II Registered Park and Garden (RPG)	Risby Hall RPG	Medium	Negligible impact Negligible adverse effect	Small impact Minor adverse effect	Harm at the lower end of the scale
N/A	Conservation Area	Skidby Conservation Area	Medium	No impact No effect	Small impact Minor adverse effect	Harm at the lower end of the scale
1103339	Grade II* listed building	Skidby Mill and Attached Mill Buildings	High	No impact No effect	Negligible impact Minor adverse effect	Harm at the lower end of the scale
1347015	Grade II* listed building	Church of St Peter	High	Negligible impact Negligible adverse effect	Negligible impact Negligible adverse effect	Harm at the lower end of the scale
1161824	Grade II listed building	Rowley Manor	Medium	Small impact Minor adverse effect	Medium impact Moderate adverse effect	Harm at the lower end of the scale
1103382	Grade II listed building	Rowley Manor Ha Ha	Medium	No impact No effect	Small impact Minor adverse effect	Harm at the lower end of the scale
1103381	Grade II listed building	Riplingham House	Medium	Small impact Minor adverse effect	Small impact Minor adverse effect	Harm at the lower end of the scale
N/A	Conservation Area	Brantingham Conservation Area	Medium	Small impact Minor adverse effect	Small impact Minor adverse effect	Harm at the at the lower end of the scale
N/A	Conservation Area	Ellerker Conservation Area	Medium	No impact No effect	Small impact Minor adverse effect	Harm at the lower end of the scale
1103354	Grade II listed building	Garth Farmhouse	Medium	Small impact Minor adverse effect	No impact No effect	Harm at the lower end of the scale of temporary duration
1014736	Scheduled monument	Romano-British villa at Cockle Pits	High	Small impact Moderate adverse effect	Medium impact Moderate adverse effect	Harm at the middle of the scale
1007737	Scheduled monument	Camera and moated site at Faxfleet Hall	High	Negligible impact Negligible adverse effect	Small impact Moderate adverse effect	Harm at the lower end of the scale
1352658 1083334	Grade II listed buildings	Yokefleet Hall and its associated West Lodge, gates, gate piers, walls and railings at Yokefleet Hall	Medium	Small impact Minor adverse effect	Medium impact Moderate adverse effect	Harm at the middle of the scale

Asset ID	Designation	Name	Value	Construction impact and residual effect	Operational impact and residual effect	Degree of harm
1346751	Grade II listed building	Lighthouse on bank of River Ouse	Medium	Small impact Minor adverse effect	Medium impact Moderate adverse effect	Harm at the middle of the scale
1013190	Scheduled monument	Hall Garth moated site, associated drainage channels and fishpond	High	Large impact Major adverse effect	Large impact Major adverse effect	Harm at the high end, but not Substantial Harm
Trial trenching area 19	Non-designated	Medieval settlement archaeology	High	Medium impact Moderate adverse effect	No further impact at operation	Harm at the lower end of the scale
1083149 1162208 1083150 1162178 1346751	Grade II* listed building Grade II listed building	Whitgift Hall and attached walls and outbuildings, forecourt piers, Coach-House/Stable/Granary Range and adjoining screen wall, Stable Range and adjoining stableyard gateway and sundial	High	Negligible impact Negligible adverse effect	Small impact Moderate adverse effect	Harm at the lower end of the scale
1083151	Grade I listed building	Church of St Mary Magdelene	High	Negligible impact Negligible adverse effect	Small impact Moderate adverse effect	Harm at the lower end of the scale
1016933	Scheduled monument	Adlingfleet medieval rectory	High	Negligible impact Negligible adverse effect	Negligible impact Negligible adverse effect	Harm at the lower end of the scale
N/A	Conservation Area	Adlingfleet Conservation Area	High	Negligible impact Negligible adverse effect	Negligible impact Minor adverse effect	Harm at the lower end of the scale
1083144	Grade I listed building	Church of All Saints	High	No impact No effect	Negligible impact Minor adverse effect	Harm at the lower end of the scale
1309899 1346729	Grade II listed buildings	Haldenby Hall and its associated threshing barn	Medium	Small impact Minor adverse effect	Small impact Minor adverse effect	Harm at the lower end of the scale
1083179	Grade II listed building	Church of St Oswald	Medium	Small impact Minor adverse effect	Small impact Minor adverse effect	Harm at the lower end of the scale
1083299	Grade II listed building	Curlews Farmhouse and Curlews Farmstead non-designated building	Medium	Negligible impact Negligible adverse effect	Negligible impact Negligible adverse effect	Harm at the lower end of the scale
1083286	Grade II listed building	Farmhouse approximately 100 metres east of Mosswood Grange Farmhouse	Medium	Negligible impact Negligible adverse effect	Small impact Minor adverse effect	Harm at the lower end of the scale
1346693	Grade II listed building	High Melwood Farmhouse and associated non-designated buildings	Medium	Negligible impact Negligible adverse effect	Small impact Minor adverse effect	Harm at the lower end of the scale
1017487	Scheduled monument	Axholme Carthusian Priory and post-Dissolution garden earthworks and Grade II listed building Low Melwood Farm (NHLE 1373834)	High	Negligible impact Negligible adverse effect	Negligible impact Negligible adverse effect	Harm at the lower end of the scale
1017556	Scheduled monument	Kinaird motte and bailey castle	High	Negligible impact Negligible adverse effect	Negligible impact Negligible adverse effect	Harm at the lower end of the scale

Asset ID	Designation	Name	Value	Construction impact and residual effect	Operational impact and residual effect	Degree of harm
1067741	Grade II listed building	Langholme Manor Farmhouse	Medium	Negligible impact Negligible adverse effect	Medium impact Moderate adverse effect	Harm at the middle of the scale
1302728	Grade II listed building	Haxey Gate Bridge	Medium	No impact No effect	Negligible impact Negligible adverse effect	Harm at the lower end of the scale
1302717	Grade I listed building	Church of All Saints	High	No impact No effect	Negligible impact Negligible adverse effect	Harm at the lower end of the scale
1156795	Grade II listed building	Manor Farmhouse and Outbuildings	Medium	Small impact Minor adverse effect	Small impact Minor adverse effect	Harm at the lower end of the scale
1156811	Grade II listed building	Highfield Farmhouse	Medium	No impact No effect	Small impact Minor adverse effect	Harm at the lower end of the scale
1003241	Scheduled monument	Beacon Hill Camp	High	Medium impact Moderate adverse effect	Small impact Moderate adverse effect	Harm at the lower end of the scale
N/A	Conservation Area	Gringley on the Hill Conservation Area	Medium	Small impact Minor adverse effect	Small impact Minor adverse effect	Harm at the lower end of the scale
1045102	Grade II listed building	Gringley Grange Farmhouse	Medium	Medium impact Moderate adverse effect	Medium impact Moderate adverse effect	Harm at the middle of the scale
1216694 1006391	Scheduled monument Grade II* listed building	Remains of the Church of St Helen	High	Negligible impact Minor adverse effect	Medium impact Moderate Adverse effect	Harm at the middle of the scale
1017741	Scheduled monument	Medieval settlement and open field system	High	Negligible impact Negligible adverse effect	Negligible impact Minor adverse effect	Harm at the lower end of the scale
1275773	Grade II* listed building	Church of St Peter and St Paul	High	No impact No effect	Small impact Moderate adverse effect	Harm at the lower end of the scale
1216936	Grade II listed building	Crow Tree Farm	Medium	Small impact Minor adverse effect	Small impact Minor adverse effect	Harm at the lower end of the scale
1216845	Grade II listed building	West End Farmhouse and Wash house	Medium	Negligible impact Negligible adverse effect	Small impact Minor adverse effect	Harm at the lower end of the scale
1234469 1276111	Grade II* listed building Grade II listed building	North Leverton Windmill and associated Windmill Cottage	High	Small impact Moderate adverse effect	Medium impact Moderate adverse Effect	Harm at the middle of the scale
1234072	Grade I listed building	Church of St John the Baptist	High	No impact No effect	Negligible impact Negligible adverse effect	Harm at the lower end of the scale
N/A	Conservation Area	East Drayton	Medium	Small impact Minor adverse effect	Medium impact Moderate adverse effect	Harm at the middle of the scale
1212946	Grade I listed building	Church of St Peter	High	Negligible impact Negligible adverse effect	Negligible impact Minor adverse effect	Harm at the lower end of the scale

Asset ID	Designation	Name	Value	Construction impact and residual effect	Operational impact and residual effect	Degree of harm
1370123	Grade II listed building	Yew Tree Farmhouse	Medium	No impact No effect	Negligible impact Negligible adverse effect	Harm at the lower end of the scale
1213011	Grade II listed building	Field Farmhouse	Medium	Negligible impact Negligible adverse effect	Small impact Minor adverse effect	Harm at the lower end of the scale
1045707	Grade II* listed building	Church of St Nicholas	High	No impact No effect	Negligible impact Negligible adverse effect	Harm at the lower end of the scale
1276445	Grade II listed building	Whimpton House	Medium	Negligible impact Negligible adverse effect	Small impact Minor adverse effect	Harm at the lower end of the scale
1017567	Scheduled monument	Whimpton Moor medieval village and moated site	High	Small impact Moderate adverse effect	Small impact Moderate adverse effect	Harm at the lower end of the scale
1018619	Scheduled monument	Ringwork at Kingshaugh Farm	High	Negligible impact Negligible adverse effect	Negligible impact Negligible adverse effect	Harm at the lower end of the scale
1212465	Grade II* listed building	Church of St Giles	High	No impact No effect	Small impact Moderate adverse effect	Harm at the lower end of the scale
1233804	Grade II* listed building	Church of St Leonard	High	No impact No effect	Negligible impact Negligible adverse effect	Harm at the lower end of the scale
1212508 1370100	Grade II listed buildings	Manor Farmhouse and its associated Barn	Medium	Negligible impact Negligible adverse effect	Small impact Minor adverse effect	Harm at the lower end of the scale

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