The Great Grid Upgrade

North Humber to High Marnham

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North Humber to High Marnham

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nationalgrid

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The Planning Inspectorate
Yr Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed North Humber to High Marnham

Case Reference: EN020034

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

29 September 2023

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1. INTRODUCTION

1.0.1 On 21 August 2023, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from National Grid Electricity Transmission (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed North Humber to High Marnham (the Proposed Development). The Applicant notified the Secretary of State (SoS) under Regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development and by virtue of Regulation 6(2)(a), the Proposed Development is 'EIA development'.

1.0.2 The Applicant provided the necessary information to inform a request under EIA Regulation 10(3) in the form of a Scoping Report, available from:

http://infrastructure.planninginspectorate.gov.uk/document/EN020034-000010

1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the Proposed Development as currently described by the Applicant. This Opinion should be read in conjunction with the Applicant's Scoping Report.

1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in Appendix 1 in accordance with EIA Regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in Appendix 2. These comments have been taken into account in the preparation of this Opinion.

1.0.6 The Inspectorate has published a series of advice notes on the National Infrastructure Planning website, including Advice Note 7: *Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping* (AN7). AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.

1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Sections 1 to 4)

ID	Ref	Description	Inspectorate's comments
2.1.1	Paragraphs 4.1.1 and 4.1.2	Proposed substation connections	The Scoping Report identifies that the overhead line would connect into two new proposed substations, one located near to the existing Creyke Beck Substation and the other close to the existing High Marnham Substation, each of which would be consented separately. The specific locations of theses proposed substations have not yet been determined. The ES should therefore confirm the likely schedule for development of these substations projects and demonstrate where they have been taken into consideration within the assessment.
2.1.2	Paragraph 4.2.1	Description of the Proposed Development	The Scoping Report presents a high-level description of the Proposed Development within a scoping boundary and notes that the design is at an early stage of development. Locations of pylons, site compounds and connections to substations have not yet been determined but are proposed to be within the scoping boundary presented. At the point an application is made, the description of the Proposed Development should be sufficiently detailed to include the design, size, capacity, technology, and locations of the different elements of the Proposed Development. This should include the footprint and heights of the structures (relevant to existing ground levels), as well as land-use requirements for all elements and phases of the development. The description should be supported (as necessary) by figures, cross sections, and drawings which should be clearly and appropriately referenced.

ID	Ref	Description	Inspectorate's comments
2.1.3	Paragraph 4.2.23	Limits of Deviation/flexibility	The Scoping Report notes that the ES will include Limits of Deviation to allow flexibility in the development of the design. Alternative pylon designs, line swap overs, and methods for installation of the overhead line and cabling are not yet confirmed and the Inspectorate considers that these options have potential for very different environmental effects. The Applicant should make every attempt to reduce the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide ranging as to represent effectively different developments. The parameters should use the maximum envelope within which the built development may be undertaken to ensure a worst-case assessment. The ES should also identify the parameters that have been assumed as the worst-case scenario for each aspect scoped into the assessment and ensure that interactions between aspects are taken into account relevant to those scenarios. The development parameters should be clearly defined in the draft Development Consent Order (dDCO) and in the accompanying ES. The Applicant, in preparing an ES, should consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations.
2.1.4	Paragraphs 4.3.5 and 4.3.13	Transient and temporary construction activities	The ES should describe the phasing or duration of each stage of construction and any potential for construction works to be carried out in more than one location simultaneously. Any stages where there would be overlapping construction activities in more than one

ID	Ref	Description	Inspectorate's comments
			location should also therefore be assessed. Where temporary construction activities such as creation of bunds for topsoil storage, temporary drainage or fencing are required, these should be considered within the assessment, where there is potential for significant effects to occur.
2.1.5	Paragraph 4.3.19	Use of culverts	The Inspectorate draws the Applicant's attention to the Environment Agency's consultation response (Appendix 2 of this Opinion) regarding its position in relation to watercourse culverting.
2.1.6	Paragraph 4.3.36	Tunnels and trenchless methods of construction	Where potential cable routes are proposed to be laid in tunnels or through other methods of trenchless excavation (such as Horizontal Directional Drilling) as mitigation for significant effects, the Applicant should ensure that these measures are appropriately secured in the draft dDCO and ES. Where such methods are employed, the potential consequential environmental effects of these techniques (risks from release of drilling fluids, additional land-take requirements) should also be considered within the assessment.
2.1.7	Table 4.2	Working widths for cable laying	Table 4.2 identifies that up to six cable trenches 1.5m wide would be required for cable laying. It is not clear however why the associated cable corridor is therefore 120m wide. The ES should provide appropriate drawings and cross sections to demonstrate the likely working methods for cable laying and thus the need for the temporary and permanent land-take required.
2.1.8	Paragraph 5.3.32	Landscaping / planting	Where landscape measures or landscape planting is identified, these should be illustrated in appropriate plans within the ES. The ES should provide details of the proposed landscape planting strategy as well as any monitoring proposed, and any assumptions made regarding vegetation growth rates.

ID	Ref	Description	Inspectorate's comments
2.1.9	Table 6.5 and Table 15.3	Night-time construction works	Within the 'Doncaster Landscape Character Assessment and Capacity Study' subsection of Table 6.5, it states that no overnight work is anticipated. Yet Table 15.3 states that night-time construction work may be required at static sites where certain activities cannot be stopped once started. The ES should contain a description of any works that are likely to be required during night-time construction activities and be consistent throughout in its reporting of night-time construction works.
2.1.10	Paragraph 7.8.5 Tables 7.5 and 7.6	Lighting – Night-time working	There are inconsistencies within the Scoping Report regarding night-time working (see ID 2.1.9 above) Tables 7.5 and 7.5 both scope in effects of night-time lighting, based on the potential for significant effects. Conversely, Paragraph 7.8.5 states that no significant effects are anticipated from night-time lighting during construction and operation. The Inspectorate requests that the Applicant clarify its position regarding this matter and that the ES is consistent.
2.1.11	N/A	Phases	The Scoping Report refers to the construction, operation, maintenance, and decommissioning phases. A description of the proposed maintenance activities is set out in Section 4.5 of the Scoping Report. The Scoping Report is inconsistent in the way it addresses maintenance, referring to both the 'maintenance phase' and 'operation/maintenance'. In some instances this results in a lack of clarity in what activities or aspects of the Proposed Development the Applicant is seeking to scope in or out of the assessment. The Inspectorate is of the view that maintenance activities form part of the operational phase, and any associated effects should be assessed as operational effects and considered alongside other

ID	Ref	Description	Inspectorate's comments
			operational effects where relevant, unless a clear justification for why this is not appropriate is provided.
2.1.12	N/A	Duration of effects	Where the App proposes to scope a matter from the EIA based on activities/impacts lasting for 'a short period of time' or 'short duration' or 'short term' only, the Inspectorate will require a defined timeframe for each assessment is required to ascertain that no LSE will arise. The ES should ensure it is consistent in using such terminology.
2.1.13	N/A	Siting of pylons	The Applicant should endeavour to fix the siting of each component to reduce uncertainty prior to submission of any application; where this is not possible, the Applicant should justify why pylon locations are not fixed and identify the level of flexibility that is being sought to ensure that the ES assesses a worst-case scenario adopting the parameters-based approach. The Inspectorate notes that a worst-case scenario may vary between topic assessments.
2.1.14	N/A	Ease of reference to figures	The Inspectorate noted the interchanging use of the terms 'figure' and 'image' used in the Scoping Report to describe Figures 17.1 and 17.2. For ease of reference and clarity, the ES should use consistent terminology when referring to figures, particularly to avoid confusion between images within the text and images supplied as separate figures. Where images are embedded in the text, these should be clearly legible.
2.1.15	N/A	Supporting information	The Inspectorate noted that some figures were provided only through accessing documents in the Scoping Report list of references rather than supplied within the report itself. The text also mentions a Figure 11.5 and an Appendix 1.A, but these are not referred to again and are not supplied.

ID	Ref	Description	Inspectorate's comments
			The Applicant should ensure that information is easy to find within the ES, and for example, where information is supplied in supporting documentation, it is clearly referenced. Where possible, supporting information should be supplied as a clearly labelled Appendix to the ES. Appropriate use of contents lists to clearly identify what is contained within volumes of material should also be employed to aid navigation.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 5)

ID	Ref	Description	Inspectorate's comments
2.2.1	Paragraph 1.4.3 and Appendix 8A	Description of alternatives	The Scoping Report describes the approach taken so far to develop the route corridor and how environmental matters have been taken into account in the refinement of the scoping boundary. The Inspectorate notes the proximity to local settlements and that designated sites remain within the scoping boundary. The Inspectorate also directs the Applicant to the Environment Agency's consultation response (Appendix 2 of this Opinion) in relation to the presence of land in Flood Zones 2 and 3, and the Canal and River Trust's response in relation to navigable waterways (namely Chesterfield Canal and Stainforth & Keadby Canal) within the scoping boundary. The ES should describe how the presence of these, and other environmental constraints, has continued to inform subsequent design choices, such as siting of particular elements of the infrastructure or the use of particular construction technologies. With reference to the iterative design process in Image 5.1 of the Scoping Report, the ES should demonstrate how these choices have been influenced by environmental factors.
2.2.2	Paragraph 1.6.4	Biodiversity Net Gain (BNG)	The Inspectorate notes that the Applicant is committing to provide 10% BNG as part of the Proposed Development. Clarity should be provided to distinguish any measures described in the ES which are provided as mitigation, as compensation, or developed as part of the commitment to BNG. The Applicant should ensure that these measures are appropriately secured in the dDCO and described within the ES.

ID	Ref	Description	Inspectorate's comments
2.2.3	Paragraph 3.5.22	Choice of route corridor option technology	The Inspectorate notes the Applicant's proposal to place the new line parallel to the existing 400kV line, on the basis it is considered to concentrate the impact in one place rather than creating new impacts elsewhere. The ES should expand on the reasons for the choice of route and method for installation, taking into account environmental considerations.
2.2.4	Section 4.6	Decommissioning	The Applicant identifies that the new overhead line would have a lifespan of 80 years and that decommissioning is not therefore scoped into the assessment. The Inspectorate notes that there is potential for the Proposed Development to involve the removal or replacement of pylons from an existing 400kV overhead line as part of the 'line swap over' process. Where swap overs are needed the ES should consider the effects of decommissioning existing pylons and those sections of the line where the swap overs occur.
2.2.5	Table 5.2	Value of receptor	The proposed approach to the value of receptors in Table 5.2 refers to defining the value of receptors based on international importance, with no reference to receptors of national, regional, or local importance. The proposed approach to setting the geographical value of receptors should also take account of and define sites or features of national, regional, or local importance. The ES should ensure that the criteria used for the assessment are defined such that it is easy to follow the methodology used.
2.2.6	Paragraph 5.4.12	Judgements on significance of effects	Where professional judgement is used to determine whether an identified effect is significant or not significant in the ES, this decision should be supported by clear reasons and evidence and make reference to any relevant guidance.

ID	Ref	Description	Inspectorate's comments
2.2.7	Table 5.3	Major effects	The proposed approach to the 'major' sensitivity criterion refers to sites and features of national importance. The Inspectorate considers that the 'major' sensitivity criterion should also consider effects on sites or features of international importance.
2.2.8	Sections 5.5 and paragraph 5.5.18	Cumulative Effects Assessment (CEA) - consultation	The Applicant should seek to agree the size of study area and the list of plans or projects for inclusion within the CEA with the relevant local authorities, taking into account the zones of influence for different aspect assessments.
2.2.9	Section 5.5	CEA – short list of projects	The ES should include an appropriate figure clearly depicting the locations and extent of projects included in the CEA in relation to the location of the Proposed Development. This should include consideration of those projects that cover a wide geographical area extending beyond the proposed study area or provide justification for why cumulative effects are unlikely to occur. This should include other major renewable energy projects in Lincolnshire and Nottinghamshire. The short list should also reflect the development pressures affecting the Humber Estuary, in particular the potential for effects on land functionally linked to protected sites along the Humber.
2.2.10	Appendix 4A 4.A.1.7	Compliance with Code of Construction Practice (CoCP)	The Inspectorate notes National Grid will use procedures to audit and inspect compliance with measures within the CoCP. The ES should set out how this will be achieved and secured and describe the process of monitoring and reporting any identified non-compliances. Where non-compliances are identified, the ES outline CoCP should also demonstrate what remedial actions will be taken.
2.2.11	Appendix 4A	General points on CoCP	The Inspectorate makes the following comments on the measures within the outline CoCP to individual measures referenced in Appendix 4A:

ID	Ref	Description	Inspectorate's comments
			• The relationship between the EIA, CoCP, Construction Environmental Management Plan, Landscape and Ecological Management Plan, Site Waste Management Plan and Construction Traffic Management Plan should be set out, using appropriate figures or diagrams for ease of understanding of the scope and purpose of the documents; • the responsibilities of each identified role within the CoCP should also be set out, using appropriate diagrams or figures to allow for ease of understanding of the management hierarchy; • how liaison with local authorities and other relevant consultation bodies will be incorporated into the CoCP; • where more than one contractor is responsible for construction works, how the Applicant will ensure consistency of CoCP measures across multiple construction contractors and / or work sites; • how the standard of reinstatement will, as a minimum, meet the recorded pre-construction condition; • the steps to be taken to reduce the potential for measures to be employed that are outside of the terms of the CoCP; • the frequency of liaison with the local community and how this will be achieved and managed, with reference to the CoCP roles and responsibilities; • how the Applicant will measure and control the quality of reinstatement measures and what remedial measures will be used where pre-construction conditions are unlikely to be met; • where vegetation is to be removed, this should be within the parameters of the assessment presented within the EIA;

ID	Ref	Description	Inspectorate's comments
			• 'high grade trees' should be defined, with reference to the ecology and biodiversity assessment, arboricultural strategy methodology (Appendix 8.C) and subsequent arboricultural assessment; • any replacement roost or structures such as hibernacula for reptiles should be installed and available in advance of any removal of any existing roost or resting place structures and in line with relevant guidance; and • the duration of 'temporary' activities should be defined.
2.2.12	Paragraph 4.3.47	CoCP – use of Horizontal Directional Drilling (HDD)	The CoCP should include consideration of the potential for HDD to be used during construction. This should include the measures to avoid potential pollution, a requirement for risk assessment for the use of drilling muds and details of liaison and permitting requirements with the Environment Agency.
2.2.13	N/A	Linear assessments	The Inspectorate considers that given the linear nature and distance of the Proposed Development, that the assessment should be clear on where effects are considered to be project-wide, or where effects are associated with particular sections of the route.
2.2.14	Table 1.1	Transboundary	The Scoping Report states that the transboundary matrix is presented in Appendix 1A, however this Appendix has not been provided. The Inspectorate notes that it has an ongoing duty in relation to consideration of transboundary effects and will undertake a separate transboundary screening exercise on behalf of the SoS under Regulation 32 of the EIA Regulations following adoption of the Scoping Opinion. The Inspectorate recommends that where Regulation 32 applies, the ES should identify whether the Proposed Development has the potential for significant transboundary effects and if so, what these

ID	Ref	Description	Inspectorate's comments
			are and which European Economic Area (EEA) States would be affected. Note: The SoS' duty under Regulation 32 of the 2017 EIA Regulations continues throughout the application process. The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the Annex to its Advice Note Twelve, available on our website at http://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/
2.2.15	N/A	Receptors	For the avoidance of doubt, when considering disruption to receptors using PRoW, this should include consideration of users of the Yorkshire Wolds Way National Trail, other national trails within the study area and, where relevant, the England Coast Path and coastal access routes.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Landscape

(Scoping Report Section 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Table 6.4 and paragraph 6.8.6	Maintenance activities during Operation	Paragraph 6.8.6 states that it is anticipated that no significant effects will arise from the maintenance activities. For the landscape assessment the maintenance activities are set out in Table 6.4. As per ID 2.1.11 of this Scoping Opinion, the Inspectorate is of the view that the maintenance phase is not a separate phase and that maintenance activities associated within this phase form part of the operational phase. Given the nature of the proposed maintenance activities proposed, the Inspectorate is content to scope these specific maintenance activities from the operational assessment.
3.1.2	Tables 6.3 and 6.5	Yorkshire Wolds Provisional Candidate Area – Construction and Operation	The Scoping Report proposes to scope out the Yorkshire Wolds Provisional Candidate Area, an area with the potential to be designated as an Area of Outstanding Natural Beauty (AONB), during the construction and operation phases on the basis that at its closest point it lies some 14 km from the Proposed Development site. Table 6.3 states that at a distance of 14 km, the 110 m high pylons would "*appear to be 48 mm tall in the landscape*" and so even if these were visible alongside the existing pylons in views out from the Provisional Candidate Area, they would not fundamentally alter the character of those views or indirectly influence the character of the landscape.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			On the basis of the distance between the Proposed Development site and the Provisional Candidate Area the Inspectorate considers that it is unlikely significant effects would occur. However, it is understood that the boundary of the Provisional Candidate Area has not yet been confirmed and could be subject to change. The Inspectorate considers that the potential for an impact pathway to this receptor should be kept under review regarding the designation of this Provisional Candidate Area. The Applicant's attention is drawn to the consultation response from Natural England (Appendix 2 of this Opinion). Furthermore, the Inspectorate notes a discrepancy between the height stated here and the calculations provided within footnote 2 in Appendix 6.5A of the Scoping Report. The ES should clarify the apparent height of the proposed infrastructure from the Provision Candidate Area.
3.1.3	Table 6.5	Lincolnshire Wolds AONB and proposed extension area – Construction and Operation	The Scoping Report proposes to scope out the Lincolnshire Wolds AONB and proposed extension area during the construction and operation phases of the Proposed Development on the basis that at its closest point the Lincolnshire Wolds lies some 30km from the nearest point to the Scoping Boundary. The Scoping Report proposes to exclude the Area from assessment given the distance to the Proposed Development and lack of potential intervisibility, the potential for significant effects is not likely. In addition, the Scoping Report proposes to exclude the Proposed AONB extension area on the basis that it has no formal status at this time (paragraph 6.2.24). The Inspectorate agrees that the impact of the Proposed Development upon the extension area, whilst not designated, can be scoped out in relation to the phases identified, on the basis of the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			evidence presented. However, should the area in question become designated, the Applicant should undertake further assessment work.
3.1.4	Table 6.5	Isle of Axholme – Consideration of area as a nationally designated landscape	The Scoping Report proposes that the study area encompasses part of the Isle of Axholme, an area of raised ground locally designated by North Lincolnshire Council as an Area of Historic Landscape Interest (AHLI) and that an assessment of effects on the AHLI will be included within Cultural Heritage and informed by the Landscape and Visual Impact Assessment (LVIA). The Scoping Report explains, however, that North Lincolnshire Council has stated their intention to submit a bid for the Isle of Axholme to be designated as an AONB. At the time of the scoping submission Natural England had not undertaken any consultation on this matter, therefore the Applicant proposes not to include the Isle of Axholme as a potential nationally designated landscape. The Inspectorate agrees that consideration of the area as a nationally designated landscape can be scoped out, on the basis of the evidence presented. However, should the area in question become nationally designated, the Applicant should undertake further assessment work as part of the Development Consent application. If possible, the Applicant should also seek to agree the sensitivity of the Isle with North Lincolnshire Council.
3.1.5	Tables 6.5 and 6.6	Thorne, Crowle and Goole Moors Important Landscape Area (ILA) – Construction	The Scoping Report proposes to scope out the Thorne, Crowle and Goole Moors ILA during the construction phases of the Proposed Development on the basis that construction activities would be distant and only present at each pylon location for a short period of time, therefore the works would not fundamentally alter the composition or character of the views out from the ILA or indirectly influence the character of the landscape within the ILA.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate does not consider that there is sufficient information and certainty regarding the proposed location of the pylons or the definition of a 'short period of time' at this stage to scope out the construction phase from further assessment.
3.1.6	Table 6.5	Areas of Great Landscape Value (AGLVs) around Gainsborough – Construction and Operation	The Applicant proposes to exclude AGLVs around Gainsborough during the construction and operational phases. It is stated that significant effects are not likely to occur on the basis that construction activities and the 400kV pylons once operational would be distant and therefore would not fundamentally alter the composition or character of the views out from the AGLV or indirectly influence the character of the landscape. It also stated that construction works would only be present at each pylon location for a short period of time. The Inspectorate does not consider that there is sufficient information on the figures provided regarding this area. Moreover, there is a lack of certainty regarding the proposed location of the pylons to conclude that significant effects upon the receptors identified would not be likely. As such the Inspectorate does not agree to scope this matter out at this stage.
3.1.7	Table 6.5	National Character Areas (NCAs) within / close to scoping boundary	Eight NCA profiles lie within or close to the Proposed Development. The Scoping Report proposes to scope out an assessment of the effects of the Proposed Development on these NCA on the basis that the assessment of effects on regional and local character areas will provide a more detailed prediction of the likely effects. The Applicant proposes, however, that the NCA will be included in the baseline assessment to provide relevant background information. The Inspectorate considers that given the linear route, length, and geographical coverage of the Proposed Development, that a landscape character assessment at a wider level than district level is required as part of the ES in order to understand the potential for

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			likely significant effects to occur. On this basis, the Inspectorate agrees that NCAs can be scoped out of the ES.
3.1.8			The Applicant proposes to scope out various LCTs, including Regional LCTs (RLCTs), from the assessment on the basis of composition of views and that they would be distant from the works. Given the uncertainty regarding the likely location of the pylons, as well as the limited information regarding the baseline conditions within these areas and the specific distances from LCTs/ RLCTs, the Inspectorate is not in a position to scope out impacts during the construction or operational phases at this stage. However, based on the description of the proposed maintenance activities provided within Section 4.5 of the Scoping Report, the Inspectorate is content to scope out maintenance activities on the basis that these are unlikely to lead to significant effects. Figure 6.5 does not clearly label the LCT numbers; the ES should include plans which are clearly labelled.
3.1.9	Table 6.5	Local Character Types (LCTs) – Construction and Operation	The Applicant proposes to scope out various LCTs, including Regional LCTs (RLCTs), from the assessment on the basis of composition of views and that they would be distant from the works. Given the uncertainty regarding the likely location of the pylons, as well as the lack of information regarding the baseline conditions within these areas and the specific distances from LCTs/ RLCTs, the Inspectorate is not in a position to scope out impacts during the construction or operational phases at this stage. However, based on the description of the proposed maintenance activities provided within Section 4.5 of the Scoping Report, the Inspectorate is content to scope out maintenance activities on the basis that these are unlikely to lead to significant effects.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Figure 6.5 does not clearly label the LCT numbers; the ES should include plans which are clearly labelled.
3.1.10	Table 6.5	Local Character Types (LCTs) – Construction and Operation	The Applicant proposes to scope out various LCTs, including Regional LCTs (RLCTs), from the assessment on the basis of composition of views and that they would be distant from the works. Given the uncertainty regarding the likely location of the pylons, as well as the lack of information regarding the baseline conditions within these areas and the specific distances from LCTs/ RLCTs, the Inspectorate is not in a position to scope out impacts during the construction or operational phases at this stage. However, based on the description of the proposed maintenance activities provided within Section 4.5 of the Scoping Report, the Inspectorate is content to scope out maintenance activities on the basis that these are unlikely to lead to significant effects. Figure 6.5 does not clearly label the corresponding LCT numbers; the ES should include plans which are clearly labelled.
3.1.11	Tables 6.5 and 6.6	Doncaster Landscape Character Assessment – Effects on Landscape Character and/or Setting from night-time lighting of construction activities – All landscape receptors	Within Table 6.5 the Scoping Report proposes to scope out this matter on the basis that no night-time construction activity is anticipated. However, at Table 6.6, the Applicant scopes this matter into the assessment. The Inspectorate would be content to scope out this matter on the basis that no overnight working is anticipated in the area identified. However, due to discrepancies within the documentation provided, the Inspectorate requests that the Applicant clarify its position regarding the presence of any night-time working, including its duration, as per ID 2.1.10 of this Scoping Opinion.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.12	Paragraph 6.7.22	Zone of Theoretical Visibility (ZTV) – Construction	The Scoping Report proposes to scope out preparation of a ZTV for the construction phase of the Proposed Development on the basis that there is a great degree of variability in the extent and timeframes of visibility of construction activity. In addition, the Applicant proposes that tall construction plant (for example tower cranes and piling rigs) rarely gives rise to significant landscape effects as it is present at each pylon location for a short period of time. Although the Inspectorate appreciates the transient nature of the construction activities proposed, a worse-case ZTV should be prepared in order to fully assess the potential for significant effects for the phase identified.

ID	Ref	Description	Inspectorate's comments
3.1.13	Paragraph 6.4.28	Heritage Assets	The Scoping Report proposes that there are several heritage assets within the study area including conservation areas, areas of historic interest and registered parks and gardens, however the designations will not be assessed as part of the landscape assessment. Instead, the Applicant proposes that, as they contribute to the value and susceptibility of the landscape, the effects of the Proposed Development on these receptors is considered in the Cultural Heritage chapter and, where assets are open to the public, they will be included in the visual assessment as described in Chapter 7: Visual. The Inspectorate is content with this approach, subject to adequate cross-referencing to the LVIA and ZTV, photomontages, and any relevant landscape management plans, where appropriate.

ID	Ref	Description	Inspectorate's comments
3.1.14	Paragraphs 6.2.11 and 7.2.8	Planning Policy	The Inspectorate recommends that Lincolnshire County Council policy should be included as it lies within 10km of the Proposed Development. The Applicant's attention is drawn to the consultation response from Lincolnshire County Council (Appendix 2 of this Opinion).
3.1.15	N/A	Receptors	The Inspectorate advises that the ES should consider the potential impacts on coastal margin in the vicinity of the development, where relevant, in line with National Planning Policy Framework (NPPF) paragraph 100.

3.2 Visual

(Scoping Report Section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Table 7.4	Perceptible effects on views from permanent loss of roadside vegetation due to localised widening of public highways – Operation (maintenance activity)	The Scoping Report proposes to scope this matter out from further assessment on the basis that any roadside vegetation lost during widening works would be reinstated like for like and therefore unlikely to result in significant effects. The Inspectorate agrees with scoping this matter out, on the basis of like for like reinstatement of vegetation. The ES should provide further detail on the planting strategy proposed; the Applicant is referred to ID 2.1.8 of this Scoping Opinion.
3.2.2	Table 7.4	Perceptible effects on views from routine maintenance activities including temporary access tracks, storage compounds, vehicle and personnel movements due to periodic vehicle/helicopter/drone access for routine maintenance and emergency repairs – Operation (maintenance activity)	The Scoping Report proposes to scope this matter out from further assessment on the basis that maintenance activities would be temporary, of short duration and therefore unlikely to result in significant effects. The Inspectorate agrees with scoping this out on the basis that activities would be temporary in nature and any impacts would therefore be short term.
3.2.3	Table 7.4	Perceptible effects on views from general maintenance activities including cutting back of vegetation along wayleave corridor to ensure safety clearances – Operation (maintenance activity)	The Scoping Report proposes to scope out this matter on the basis that vegetation management is unlikely to have ongoing significant effects, and that the main effect would be from the initial loss during the construction phase. On the basis of the above, the Inspectorate is content that this matter can be scoped out, with reference to the phase identified.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.4	Tables 7.5 and 7.6	Perceptible effects on views – Receptors outside the ZTV – Construction and operation (maintenance activity)	The Scoping Report proposes to scope out this matter in relation to the receptors and phases identified on the basis that there would be no likelihood for any visual effects on these receptors as a result of the Proposed Development. The Inspectorate is content that receptors outside the ZTV would be unlikely to experience significant effects as a result of the Proposed Development and therefore agrees that this matter can be scoped out of further assessment. However, the Applicant should seek agreement from relevant consultation bodies regarding ground-truthing of the ZTV and the selection of viewpoints to be assessed.
3.2.5	Tables 7.4 and 7.6	Perceptible effects on views - People living and moving around communities and engaging in recreational activities including people using Public Rights of Way (PRoW) and waterways (within 3km of the Project) – Operation (maintenance activity)	The Applicant proposes to scope out maintenance activity in Table 7.6 although the operational phase is scoped into the EIA. No explanation is provided in Table 7.6 why the maintenance phase is scoped out. Table 7.4 states that periodic helicopter/vehicle/drone activities arising from routine maintenance are unlikely to lead to significant effects. Similarly, Table 7.4 states that significant effects from vegetation clearance along the wayleave are likely to be derived from the construction phase and it is therefore unlikely that ongoing significant effects will arise from the maintenance phase. The Inspectorate is in agreement that these specific maintenance activities that are proposed to occur during the operational phase can be scoped out of the operation assessment.
3.2.6	Tables 7.5 and 7.6	Perceptible effects on views – People living and moving around communities and engaging in recreational activities including people using PRoW and waterways (beyond 3km of the Project) –	The Scoping Report proposes to scope out this matter for the receptors identified on the basis that the construction activities are unlikely to be perceptible beyond 3km, and, if they are, the short term and temporary nature of the works is highly unlikely to result in significant effects. In addition, the Applicant proposes that, with reference to the operational phase, including maintenance activity,

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		Construction and operation (including maintenance activity)	the potential for significant effects as a result of the Proposed Development would not be likely. The Inspectorate is content that this matter can be scoped out on the basis of the explanation provided.
3.2.7	Tables 7.4, 7.5 and 7.6	Perceptible effects on views - Occupants of individual properties – Construction and Maintenance activity during Operation	The Scoping Report proposes to scope out this matter for the receptors identified on the basis that construction activities would be temporary and short term and therefore unlikely to result in significant effects. In addition, the Applicant proposes that, with reference to maintenance activity, the potential for significant effects as a result of the Proposed Development would not be likely. Although it is acknowledged that the proposed construction works would be temporary in nature, the Inspectorate notes that temporary works can lead to significant effects. Given the early stage of design the Inspectorate does not consider that sufficient information is currently available to determine that significant effects would be unlikely during the construction phase of the Proposed Development. In regard to the Scoping Report's reference to scoping of the maintenance phase, as set out in the ID 3.2.5 of this Scoping Opinion, the Inspectorate is content to scope out these specific proposed maintenance activities.
3.2.8	Tables 7.5 and 7.6	Perceptible effects on views – Road and rail users – Construction and operation (including maintenance activity)	The Scoping Report proposes to scope out this matter for the receptors and phases identified on the basis that people travelling by road or rail are not anticipated to experience significant effects because of the glimpsed nature of the views, speed of travel and the short term, temporary nature of works at each pylon. The Inspectorate is content that this matter can be scoped out on the basis of the explanation provided.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.9	Tables 7.5 and 7.6	Perceptible effects on views – People at work – Construction and Operation (including maintenance activity)	The Scoping Report proposes to scope out this matter for the receptors and phases identified on the basis that people at work are not anticipated to experience significant effects because their attention is likely to be focussed on their work rather than their surroundings and because of the short term and temporary nature of the construction works at each pylon. The Inspectorate is content that this matter can be scoped out on the basis of the explanation provided.
3.2.10	Table 7.6	Perceptible effects on views – People at protected viewpoints, panoramas and viewing corridors – Maintenance activity	Please refer to ID 2.1.11.
3.2.11	Paragraph 7.7.33	Production of a ZTV – Construction phase	The Scoping Report proposes to scope out preparation of a ZTV for the construction phase of the Proposed Development on the basis that there is a great degree of variability in the extent and timeframes of visibility of construction activity and tall construction plant (for example tower cranes and piling rigs) rarely gives rise to significant visual effects, as it is present at each pylon location for a short period of time. The Applicant proposes that construction plant will, however, be considered in the assessment of construction effects on visual receptors. Although the Inspectorate appreciates the variable nature of the construction activities proposed, a worse-case ZTV should be prepared in order to fully assess the potential for significant effects for the phase identified.

ID	Ref	Description	Inspectorate's comments
3.2.12	Paragraph 7.7.15	Methodology – Viewpoints and Photomontages	The Applicant should make the effort to agree the number and location of viewpoints and subsequent photomontages to be produced with relevant consultation bodies. Evidence of this agreement should be provided within the application documents.
3.2.13	Chapter 7	Definitions – Perceptible effects	The term 'perceptible effects' with regards to this section has not been defined. The Inspectorate advises that the Applicant clearly define this term in future documentation.
3.2.14	Chapter 7	Visual impact of cable crossings on canals and waterways	The Inspectorate advises that consideration should be given within the ES to the visual impact of cable crossings of the canal network, particularly where the landscape does not provide for easy visual mitigation of the works, and any specific mitigation which may be required. The visual impact of users of the waterways should be considered within the ES.
3.2.15	Chapter 7	Visual Impact Assessment	The Inspectorate recommends that canals should be included as viewpoints within the Visual Impact Assessment and that an assessment of the proposed changes to the landscape at proposed canal crossing locations should be included.
3.2.16	Chapter 7	The effect of lighting on canals and waterways	The Inspectorate recommends that the impact of lighting near to the canal and waterway network should be specifically assessed, including the potential for distracting boaters at dusk.

3.3 Ecology and Biodiversity

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	Table 8.6	Permanent habitat loss, temporary habitat loss, disturbance and fragmentation, indirect impacts - Statutory and non-statutory designated sites (without mobile qualifying criteria) located greater than 2km from the site	The Applicant proposes to scope out this matter for all phases for the receptors identified on the basis that the potential for significant effects as a result of the Proposed Development would not be likely. The Inspectorate considers that there is insufficient evidence relating to the extent and location of permanent habitat loss, demonstration that these designations do not form supporting habitat / foraging habitat (for example) to determine whether these statutory and non-statutory designated sites are linked to the Proposed Development. In the absence of this information, the Inspectorate is unable to agree that significant effects would not be likely.
3.3.2	Table 8.6	Incidental mortality of protected or notable species (Invertebrates) – Construction and Operation (Maintenance activity)	The Applicant proposes to scope out this matter for all phases for the receptor identified on the basis that it is unlikely that notable population assemblages will be significantly affected by direct mortality once mitigation measures are in place. The Inspectorate is content that this matter can be scoped out, subject to appropriate mitigation measures agreed with the relevant stakeholders, secured and embedded within control documents.
3.3.3	Table 8.9	Impacts to common and widespread habitats of low sensitivity and/or conservation interest	The Applicant proposes to scope out this matter. However, the Inspectorate considers that there is currently insufficient information regarding the habitats the Applicant has classified to be of low sensitivity and/or conservation interest, together with the scale of any temporary/permanent loss, and therefore cannot agree that significant effects would not be likely.

ID	Ref	Description	Inspectorate's comments
3.3.4	N/A	Chesterfield Canal Site of Special Scientific Interest (SSSI)	The Applicant's attention is drawn to the consultation response from the Canal and River Trust (Appendix 2 of this Opinion). This states that a section of the Chesterfield Canal is a designated SSSI and, although it is designated primarily for the nationally uncommon aquatic plant community, it is an important flight line for birds and bats. The Inspectorate therefore advises that any cable crossings have measures in place to reduce the risk of cable strikes by birds and that any construction phase activities should be kept away from the canal corridor to minimise any disturbance. The ES should also provide full details of habitat loss in proximity to the Chesterfield Canal SSSI, including an assessment of the extent of vegetation loss. Any proposed mitigation measures should be agreed with the relevant stakeholders.

3.4 Heritage

(Scoping Report Section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Table 9.4 and Figure 9.1	Impacts to the access of heritage assets – Operation	The Applicant proposes to scope out impacts of new infrastructure altering the access of heritage assets on the basis that due to the scale and size of the footprint of individual pylons, there is limited potential for significant effects to occur. Considering the number of heritage assets present within the scoping boundary (displayed on Figure 9.1) and given the lack of detail regarding the confirmed siting of the operational infrastructure, the Inspectorate does not consider that sufficient detail has been provided at this time to justify the scoping out of this matter. The Inspectorate would however agree to scope this matter out on the provision of more detailed design information being included with the application which demonstrates the absence of likely significant effects on the access of heritage assets. In the absence of such information the ES should provide an assessment of effects for this matter.
3.4.2	Table 9.4 and paragraph 9.6.5	Physical impacts or impacts to heritage assets as a result of changes to setting from vehicular traffic and maintenance activities – Operation	The Applicant proposes to scope this matter out on the basis that the planned frequency of maintenance visits, one per year, would not constitute an impact of sufficient magnitude to cause significant effects to either designated or non-designated heritage assets. The Inspectorate considers it unlikely that significant effects would arise but at this stage has insufficient information regarding the maintenance activities (referred to within paragraph 9.6.5) to scope the matter out. The Inspectorate advises that consideration should be given to the potential for physical impacts on cultural heritage assets from maintenance activities associated with the operational phase.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Consideration should also be given to the potential for operational effects associated with maintenance activities on the setting of above ground heritage assets. The Inspectorate does consider that the impact from vehicular traffic arising from maintenance activities on heritage assets arising during the operational phase can be scoped out of the ES.
3.4.3	Paragraphs 9.5.1, 9.5.2, 9.6.6, Table 9.5 and Figure 9.1	Physical impacts on designated assets – Construction	The Applicant proposes to scope this matter out on the basis that there will be no physical impacts on designated assets within the scoping boundary as they will be avoided by the construction works. Paragraph 9.5.1, and Table 4.A.1 of Scoping Report Volume 2, state that embedded measures "*will endeavour to*" include design intervention to avoid physical and indirect impacts on both designated and non-designated heritage assets. The Inspectorate notes that impacts to heritage assets as a result of changes to their setting have been scoped in for assessment. The Inspectorate does not consider that sufficient detail has been provided at this time to justify scoping this matter out. The Inspectorate would expect the ES to provide a suitable baseline which has been agreed with the relevant consultation bodies for designated cultural heritage assets to be included in the assessment. Further detail regarding the mitigation measures to avoid physical impacts on designated assets should be provided within the ES, noting the phrase "*will endeavour to*" suggests there is a lack of certainty around this. The Applicant should seek to agree the suitability of mitigation measures with the relevant consultation bodies and provide evidence of this within the application documents.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.4	Paragraph 9.4.28 and Table 9.5	Temporary impacts to the historic landscape as a result of changes to setting – Construction	The Applicant proposes to scope this matter out on the basis that the Proposed Development's temporary construction activities are unlikely to result in significant effects to the historic landscape. The Inspectorate notes that the Applicant proposes to scope in an assessment of physical impacts on the historic landscape for the construction phase. Given the temporary nature of the construction phase impacts, the Inspectorate considers that significant effects on the historic landscape as a result of changes to setting during the construction phase are unlikely to occur and agrees to scope this matter out from further assessment.

ID	Ref	Description	Inspectorate's comments
3.4.5	Paragraphs 9.7.2 and 9.7.3	Study area	The Scoping Report proposes a 1km study area for all designated and non-designated cultural heritage assets with the study area being selectively extended for 'higher grade assets' to capture assets of the highest significance where the wider landscape forms a key contributing factor to that significance. This will be informed by the ZTV which will be developed in conjunction with the LVIA. The Applicant should agree the study areas and cultural heritage receptors for the assessment with the relevant consultation bodies, and justification for the use of the study areas proposed must be provided. Additionally, the Applicant should define what is classified as 'higher graded assets' for which the study area would be extended as well as agreeing the 'higher graded assets' for inclusion/exclusion with the relevant consultation bodies. The Applicant's attention is drawn to responses from Historic England, North Lincolnshire Council, Lincolnshire County Council and Nottinghamshire County Council

ID	Ref	Description	Inspectorate's comments
			(Appendix 2 of this Opinion) with regard to heritage receptors to be included in the assessment. The Inspectorate considers that the study areas used for the assessment should be illustrated on an appropriate figure within the ES.
3.4.6	Paragraph 9.7.3	ZTV	The Inspectorate notes that a ZTV will be developed in conjunction with the LVIA. The Inspectorate recommends the LVIA and heritage consultants liaise closely with regards to the ZTV to ensure heritage assets within the LVIA ZTV are appropriately identified, noting that impacts on setting are not limited to just visual. Impacts on setting relating to noise, dust and vibration, spatial associations and the historic relationship between places, as examples, should be considered. Should the use of a ZTV be considered ineffective for the cultural heritage assessment (the Scoping Report states the ZTV may not reflect what is visible on the ground nor can it be used to define the extent of setting of heritage assets) this should be explained and justified in the ES with agreement from the relevant consultation bodies.
3.4.7	Paragraphs 9.7.5 and 9.7.6	Archaeological baseline and surveys	A desk-based assessment of the listed data sources at paragraph 9.7.5 and a walkover survey is proposed to inform the heritage aspect chapter. The Applicant should ensure that the information used to inform the assessment is robust and allows for suitable identification of assets likely to be impacted by the Proposed Development. The Applicant should agree the need and methodology for any intrusive investigations required such as trial trenching, geophysical surveys and deposit modelling with the relevant consultation bodies. Where surveys are required to adequately understand the archaeological potential to inform the assessment and design, and

ID	Ref	Description	Inspectorate's comments
			any mitigation requirements this should be undertaken prior to submission. Any uncertainties that remain should be clearly identified within the ES. The Applicant's attention is drawn to responses from Historic England and North Lincolnshire Council (Appendix 2 of this Opinion) in this regard.
3.4.8	Tables 9.6, 9.7, 9.8 and paragraph 9.7.14	Assessment methodology	The ES should clearly explain what aspect-specific criteria have been used to define receptor value/ sensitivity and magnitude of change for the archaeology and cultural heritage assessment. The approach to determining how these combine to inform the conclusions on the significance of effects should also be described. The ES should clearly set out where professional judgement has been utilised.
3.4.9	Table 9.7 and paragraph 9.7.14	Significance of effects	Historic England has raised concern (Appendix 2 of this Opinion) with the proposed approach to recording the impact magnitude and significance of effect on heritage assets (both designated and non-designated). The Applicant should make effort to agree the approach with Historic England and other relevant consultation bodies. In the event that the Applicant's approach to recording significance of an asset deviates from the advice it has received, the ES should explain why and provide justification based on relevant evidence, guidance and professional opinion.
3.4.10	Table 9.6 and Appendix 9.A	Receptors	The Scoping Report does not refer to the canal network as a cultural heritage receptor. Considering the proximity of the Proposed Development to the canal network, the ES should consider the potential for impacts on this receptor. The Inspectorate directs the Applicant to the Canal and River Trust's consultation response (Appendix 2 of this Opinion) and recommends that the further designated and non-designated heritage assets flagged within their response are considered within the ES.

3.5 Water Environment

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Table 10.7	Watercourses and water bodies, existing water interest - pollution from silt, hydrocarbons and other construction materials, increased rates and volumes of rainfall runoff, reduced channel flow capacity due to siltation and disruption to the land drainage regime - Construction	The Applicant proposes to scope out these matters for the phase and receptors identified on the basis that measures set out in the Scoping Report would be implemented to manage work site runoff to ensure watercourses are not polluted, nor their flow capacities reduced, and the function of existing land drainage routes and systems are retained. Although the Inspectorate acknowledges the information and measures within the Scoping Report, it considers that there is currently insufficient evidence to scope out these matters for the phase identified. The Applicant should ensure that any measures identified are set out clearly within the CEMP, agreed with the relevant stakeholders and appropriately secured within the DCO.
3.5.2	Table 10.3	Increased surface water flood risk - Operational runoff from impermeable surfaces, such as Cable Sealing End Compounds (CSECs) – Operation	The Applicant proposes to scope out this matter for the phase identified on the basis that measures set out in the Scoping Report would be implemented to sustainably manage operational drainage from CSECs to prevent increases in surface water flood risk. Although the Inspectorate acknowledges the information and measures within the Scoping Report, it considers that as the numbers and locations of the CSECs, plus other potential areas of impermeable surface are not yet available, there is currently insufficient evidence on the amount of impermeable surface to scope out this matter for the phase identified. The Applicant should ensure that any measures identified are agreed with the relevant stakeholders, that they take into account any projected changes in rainfall as a result of climate change, and that they are appropriately secured within the DCO.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.3	Table 10.7	Floodplains, landowners and infrastructure - loss of floodplain storage and changes in floodplain flow conveyance routes, increased rates and volumes of rainfall runoff, disruption to the land drainage regime – Operation	The Applicant proposes to scope out this matter for this phase and receptor on the basis that the nature and footprint of operational above ground infrastructure (pylons and CSECs) would not cause significant floodplain storage losses or disruption to floodplain flow paths. Although the Inspectorate acknowledges the information and measures within the Scoping Report, it considers that there is currently insufficient information to scope out this matter for the phase identified. The Applicant should ensure that any measures identified are agreed with the relevant stakeholders, that they take into account any projected changes in rainfall as a result of climate change, and that they are appropriately secured within the DCO.
3.5.4	Table 10.3	Water Environment Receptors – use of machinery and vehicles for non-intrusive inspections and localised repairs – Operation	The Applicant proposes to scope out this matter for the phase and receptors identified on the basis that the nature and scale of the maintenance activities would not cause pollution of the water environment and any physical disturbance would be highly localised. The Inspectorate is content that this matter can be scoped out on the basis that activity for the phase identified would be unlikely to give rise to significant effects.
3.5.5	Paragraph 10.6.11	Water Quality effects – Operation	The Applicant proposes to scope out this matter for the phase identified on the basis that there would be no operational discharges to surface watercourses and rainfall runoff from the CSECs would be sustainably attenuated (and if required treated) prior to discharge to the receiving water environment. Physio-chemical elements supporting the Water Framework Directive waterbody status would therefore be safeguarded. The Applicant therefore proposes that no likely significant effects are anticipated in relation to water quality.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate considers that, subject to the provision of further evidence that no pollutant sources are present or present a risk, and that the relevant stakeholders agree that the drainage proposals and any emergency plans / operational environmental management plans are sufficient to eliminate the risk, that an assessment would not be required. Therefore, the Inspectorate is content that this matter can be scoped out for the phase identified.
3.5.6	Paragraph 10.6.14	Water Environment Receptors – Operation	The Applicant proposes to scope out all maintenance effects, including pollution of watercourses and physical disturbance on water environment receptors on the basis that maintenance activities would generally be limited to non-intrusive inspections. Where repairs are necessary, the Applicant proposes that activities involved would be similar to those for construction, albeit over a much smaller area and scale and that maintenance would be undertaken in line with the Applicant's operational management procedures. The Applicant therefore proposes that maintenance activities are unlikely to result in likely significant effects. The Inspectorate is content that this matter can be scoped out on the basis of the explanation provided and subject to a number of mitigation measures being identified within the relevant control documentation and secured within the DCO.

ID	Ref	Description	Inspectorate's comments
3.5.7	Paragraph 2.3.19	NPPF reference – Development and Flood Risk	Reference to paragraph 154 of the NPPF is noted, however as there is flood risk associated with certain areas within the scoping boundary, the Inspectorate also draws the Applicant's attention to NPPF policies specifically relating to development and flood risk (paragraphs 159-

ID	Ref	Description	Inspectorate's comments
			169). It is expected that these paragraphs will be referenced as necessary within the forthcoming ES.
3.5.8	Paragraph 4.2.42	Limits of Deviation – Flood Risk	In order to facilitate flexibility in terms of underground cables and trenchless crossings and watercrossings, the Inspectorate advises that recommend flood risk be taken into consideration when setting the Limits of Deviation.
3.5.9	Paragraph 10.4.1	Flood Risk Data Sources	The Inspectorate recommends that the Applicant also utilise local Strategic Flood Risk Assessments in addition to the other sources listed.
3.5.10	Paragraph 10.7.9	Flood Risk Models	The Inspectorate advises that a thorough assessment of the suitability of any flood models should be undertaken prior to deciding whether any new or updated modelling is necessary to undertake a site-specific flood risk assessment.
3.5.11	Chapter 10	Scope of Assessment	The Inspectorate advises that the proximity to main rivers and any flood defences assets should be scoped into the assessment, with regard to current and future flood risk, to ensure that flood risk is not increased elsewhere.
3.5.12	Paragraph 10.4.10	Fluvial and Tidal Flood Risk	Whilst the Applicant acknowledges that parts of the study area are at high risk of flooding and that areas of the Proposed Development would cross large extents of fluvial and coastal floodplain, fluvial flood risk has been scoped out of the assessment. The Inspectorate advises that this matter should therefore be scoped into further assessment. Similarly, the Inspectorate considers that there is not adequate justification for scoping out tidal flood risk from further assessment at this time and the Inspectorate therefore advises that this matter should also be scoped in.

ID	Ref	Description	Inspectorate's comments
3.5.13	Section 4.2, Paragraphs 10.6.6 and 10.6.8	Flood Flow Routes	The Applicant has identified structures which would have the potential to obstruct flood flow routes and reduce flood storage capacity if not appropriately located or designed, including open cut (trenched) watercourse crossings. In addition, the Applicant has identified that some sites located in the floodplain could see localised flood impacts associated with the storage of spoil, reducing available floodplain storage or interrupting key floodplain flow paths. Flood flow routes should therefore be scoped into the ES to ensure that any impacts on flow routes are given adequate consideration.
3.5.14	Paragraph 4.6.1	Future Flood Risk	The Applicant states that the design life of the Project is to be at least 80 years, with regular maintenance it could be extended further. The Inspectorate therefore advises that, as a minimum, the Applicant should assess the potential flood risk implications of the scheme for the next 80 years.
3.5.15	Paragraph 10.4.13	Rising sea level due to Climate Change	The Inspectorate advises that where development is proposed in an Internal Drainage Board managed area, the ES should also consider the long-term future of the proposal in terms of climate change. The Applicant should also engage with the Internal Drainage Board.

3.6 Geology and Hydrogeology

(Scoping Report Section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	Table 11.3	Exposure to existing contamination and the mobilisation of existing contamination as a result of ground disturbance from construction activities – Construction	The Applicant proposes to scope out this matter for the phase identified on the basis that the baseline has identified a generally very low/low risk of existing significant contamination within the study area. Appendix 11.A of the Scoping Report presents the Tier 1 Preliminary Contamination Risk Assessment, which is described as a qualitative assessment of historical and published information. It identifies locations where there is potential for significant source of contamination and further analyses the potential risk of these sites in Table 11.A.3.2. Nine sites (as identified in paragraph 11.4.38 of the Scoping Opinion) are stated to present moderate or above potential risk but Table 11.A.3.2 concludes that this risk could be mitigated to low through a commitment to use appropriate Personal Protective Equipment for construction workers to prevent exposure (GH03 within the CoCP) and that, in instances of moderate risk, there may not be an interaction between the Proposed Development and the contaminated ground. Table 11.3 of the Scoping Report states that these sites will be subject to a targeted investigation and where appropriate, a further risk assessment will be undertaken to identify any mitigation measures required. The Inspectorate is content that this matter can be scoped out for the sites identified as being at very low/ low risk as identified in Table 11A.3.2 on the basis of the explanation provided, subject to the appropriate risk assessments and mitigation measures being secured. For the sites identified as being moderate risk or above, the Inspectorate does not have sufficient information to exclude the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			possibility of significant effects. An assessment of likely significant effects arising from mobilisation of existing contamination should be provided in the ES where proposed works intersect or result in impact pathways at these locations. The assessment should be informed by the further targeted investigation and risk assessment described in the Scoping Report unless it can be demonstrated through agreement with the relevant consultation bodies that this is not required. The Applicant's attention is drawn to the response of the Environment Agency (see Appendix 2 of this Opinion) in this regard. It should be clear how any mitigation measures required are secured in the dDCO.
3.6.2	Table 11.3	Creation of pathways and the mixing of aquifers as a result of piling – Construction	The Applicant proposes to scope out this matter for the phase identified on the basis that the baseline has identified a generally very low/low risk of existing significant contamination within the study area. Therefore, the Applicant proposes that significant effects related to piling are unlikely. In addition, there is to be a commitment (GH02) in the CoCP to undertake a risk assessment in accordance with Environment Agency guidance. The Inspectorate is content that this matter can be scoped out subject to clear evidence regarding the risk of contamination being provided as part of the DCO application and subject to the appropriate risk assessment being carried out.
3.6.3	Table 11.3	Reducing groundwater levels and impacts on groundwater quality and flows due to dewatering activities (to lower the groundwater table around an excavation) – Construction (overhead line only)	The Applicant proposes to scope out this matter for Overhead Lines for the phase identified on the basis that dewatering is not required. The Inspectorate is content that this matter can be scoped out in relation to the Overhead Lines only subject to dewatering not being required.
3.6.4	Table 11.3	Physical and chemical changes to	The Applicant proposes to scope out this matter for the phase identified on the basis that if discharges of groundwater are required

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		groundwater as a result of discharges of groundwater from dewatering – Construction	an environmental permit will be obtained, and impacts/effects will be controlled by the permit (in accordance with commitment GH07 of the CoCP).The Inspectorate is content that this matter can be scoped out, subject to an environmental permit being obtained in the event that dewatering and thereby discharges of groundwater is required.
3.6.5	Table 11.3	Ground Instability including coal mining due to general construction activities – Construction	The Applicant proposes to scope out this matter for the phase identified on the basis that embedded and control measures relating to best practice engineering design are included and therefore significant effects are not likely. The Inspectorate is content that this matter can be scoped out on the basis of the explanation provided and subject to the relative embedded and control measures being secured and implemented.
3.6.6	Table 11.3	Introduction of new contamination due to general construction activities – Construction	The Applicant proposes to scope out this matter for the phase identified on the basis that significant effects are not likely and commitments GH04 and GH05 are proposed in the CoCP. The Inspectorate is content that this matter can be scoped out subject to the relative commitments being secured and agreed with relevant stakeholders.
3.6.7	Table 11.3	Exposure of unexpected contamination due to general construction activities – Construction	The Applicant proposes to scope out this matter for the phase identified on the basis that significant effects are not likely and commitment GH08 is proposed in the CoCP. The Inspectorate is content that this matter can be scoped out on the basis that significant effects are not likely and subject to the relative commitment being secured and agreed with relevant stakeholders.
3.6.8	Table 11.3	Accumulation of ground gas and radon in confined spaces resulting in explosion/asphyxiation/exposure due to general construction	The Applicant proposes to scope out this matter for the phases identified on the basis that significant effects are not likely and embedded and control measures GH01 and GH03 are included in the CoCP. In addition, the majority of the Proposed Development is in a radon low risk area where radon protection measures wouldn't be

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		activities - Construction and Operation	required. For the small area where the radon potential is slightly higher, the Applicant will consider the need to obtain radon reports in accordance with the embedded and control measures. Furthermore, the Applicant proposes that, if required, entry to confined spaces would be undertaken in accordance with appropriate Health and Safety guidance and National Grid's health and safety working procedures. The Inspectorate is content that this matter can be scoped out on the basis of the explanation provided, that significant effects are not likely and subject to the relative commitments being set out within the relevant control documents and secured within the DCO.
3.6.9	Table 11.3	Impact on geological designated sites due to the permanent presence of the overhead line – Operation	The Applicant proposes to scope out this matter for the phase identified on the basis that significant effects are not likely and as the potential effects on Sites of Geological Importance are considered during the construction phase. The Inspectorate is content with this approach. Should, however, the assessment for the construction phase identify the potential for significant effects, the Applicant should consider whether further assessment in relation to the operational phase of the proposed development is necessary.
3.6.10	Table 11.3	Sterilisation of safeguarded minerals due to the permanent presence of the overhead line – Operation	The Applicant proposes to scope out this matter for the phase identified on the basis that significant effects are not likely and has prepared a preliminary qualitative minerals resource assessment in support of their conclusions. The Inspectorate is content that this matter can be scoped out for the phase identified.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.11	Table 11.3	Introduction of new potential contaminants to the environment from leaks, spills, fuels and oils due to general operational activities or as a result of general maintenance activities – Operation (maintenance activities)	The Applicant proposes to scope out this matter for the phase identified on the basis that significant effects are not likely and that the use is not considered to be contaminative given the nature of the project and in consideration of best practice measures and maintenance. The Inspectorate draws the Applicant's attention to ID 2.1.11. The Inspectorate is content to scope out the specific maintenance activities that are planned to occur during the operational phase, on the basis of the explanation provided and subject to best practice measures being set out within the relevant control documents, secured within the DCO and fully implemented.
3.6.12	Table 11.3	Changes to groundwater levels and/or recharge rates due to the permanent presence of impermeable surfaces – Operation	The Applicant proposes to scope out this matter for the phase identified on the basis that significant effects are not likely and due to the small surface area of the permanent footprint of the Proposed Development. In addition, where new or additional surfacing is required, the Applicant proposes that permeable surfacing would be utilised and designed to meet current drainage standards. The Inspectorate is content with this approach.
3.6.13	Table 11.3	Ingress and accumulation of ground gas in buildings resulting in explosion/asphyxiation/ exposure as a result of general maintenance activities – Operation	The Applicant proposes to scope out this matter for the phase identified on the basis that existing contamination is considered during the construction phase. In addition, confined spaces entry during the operation phase is unlikely and, where required, appropriate Health and Safety requirements will be followed and the general National Grid health and safety working procedures. Therefore, significant effects are not likely. The Inspectorate is content that this matter can be scoped out on the basis of the explanation provided.

ID	Ref	Description	Inspectorate's comments
3.6.14	Chapter 11	Groundwater abstractions	The Inspectorate advises that the Applicant should ensure that all groundwater abstractions are included in the assessment, namely licensed and private supplies.
3.6.15	Chapter 11	Pollution prevention measures	The Inspectorate advises that for surface water drainage, pollution prevention measures should be incorporated, particularly in areas that pass through the source protection zones. Parts of the Proposed Development boundary overlie the Chalk which is classified as a Principal Aquifer, therefore pollution prevention, especially during the construction phase, will be required in order to prevent issues with fine sediment. Any pollution prevention measures should be secured within the DCO.
3.6.16	Paragraph 4.3.47	HDD	The Inspectorate advises that details of where and how HDD will be carried out, if required, should be provided within the ES, as this activity has the potential to cause pollution if not completed in a controlled manner. This should include details of any risk assessments / permits required. Early discussion with the Environment Agency is advised and the potential use of HDD techniques should be included in the CEMP, if it is to be utilised.

3.7 Agriculture and Soils

(Scoping Report Section 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Table 12.4, sections 12.5 and 12.6	Temporary acquisition of land to accommodate construction activities leading to: • Temporary disruption to land holdings resulting in reduction in the operational capacity of farm businesses – Construction • Loss of income to farm businesses – Construction	The Applicant proposes to scope this matter out on the basis that the measures outlined in Section 12.5 would reduce the potential for temporary disruption and any residual disruption to loss of income from farm businesses would be dealt with through compensation agreements which lie outside of the scope of the EIA process. On the basis of these measures and compensation agreements being implemented, the Inspectorate agrees to scope these matters out from further assessment.
3.7.2	Table 12.4, sections 12.5 and 12.6	Permanent acquisition of land to accommodate the operational Proposed Development leading to: • Reduction in the operation capacity of farm businesses – Operation • Loss of income to farm businesses – Operation	The Applicant proposes to scope this matter out on the basis that the measures outlined in Section 12.5 would reduce the potential for disruption and any residual disruption would be dealt with through compensation agreements which lie outside of the scope of the EIA process. On the basis of these measures and compensation agreements being implemented and subject to further design detail being made available and confirmation of the extent of the reduction in the operational capacity of farm businesses and loss of income, the Inspectorate agrees to scope this matter out from further assessment.
3.7.3	Tables 12.1 and 12.4	EMF effects – Operation	The Applicant proposes to scope this matter out on the basis that the National Policy Statement for Electricity Networks Infrastructure (EN-5) states that there is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			agriculturally significant consequences. Table 12.1 details that where indirect effects to sensitive land uses (such as riding manèges) are identified, additional conductor clearances will be applied. Considering the lack of evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences, and given the measures proposed within Table 12.1, the Inspectorate agrees that this matter can be scoped out from further assessment.
3.7.4	Table 12.4 and Section 12.5	Temporary acquisition of land to accommodate maintenance activities associated with the operational phase leading to: • Temporary loss of agricultural land (including best and most versatile (BMV) land) and reduction in the extent of the most productive agricultural land – Operational maintenance activities; • Temporary disruption to landholdings resulting in reduction in the operational capacity of farm businesses – Operational maintenance activities; and • Loss of income to farm businesses – Operational maintenance activities.	The Applicant proposes to scope these matters out on the basis that there is potential for only small areas of BMV land to be temporarily affected and that the measures outlined in Section 12.5 would reduce the potential for temporary disruption, and any residual disruption to loss of income from farm businesses would be dealt with through compensation agreements which lie outside of the scope of the EIA process. In the absence of further detail relating to the location and frequency of maintenance activities associated with the operational phase, the Inspectorate does not at this time agree to scope these matters out from further assessment. The ES should provide an assessment of these matters where there is potential for likely significant effects to occur. The Inspectorate draws the Applicant's attention to ID 2.1.11 of this Opinion.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.5	Table 12.4 and Section 12.5	Temporary soil disturbance from maintenance activities associated with the operational phase (including stripping and stockpiling) resulting in a reduction of in the ability of soil to function and provide ecosystem services – Operational maintenance activities	The Applicant proposes to scope these matters out on the basis that the measures outlined in Section 12.5 would minimise the risk of damage to soil health and function which prevents short-term damage and subsequent long-term damage. On the basis of the control and management measures listed in Section 12.5 being implemented, the Inspectorate agrees that significant effects are unlikely to occur and agrees to scope this matter out from further assessment. The Inspectorate draws the Applicants attention to ID 2.1.11 of this Opinion.

ID	Ref	Description	Inspectorate's comments
3.7.6	Paragraph 12.7.1	Baseline	The Inspectorate welcomes the proposed detailed ALC surveys of relevant areas. The ES should clearly set out what constitutes a relevant area for surveying and effort should be made to agree the detailed ALC survey locations with the relevant consultation bodies. The Applicant's attention is drawn to Natural England's response (Appendix 2 of this Opinion) in this regard.

3.8 Traffic and Transport

(Scoping Report Section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	Table 13.6	Traffic impacts during operation and maintenance • Increased severance to pedestrians, cyclists and bridleway users; • Increased driver delay; • Increased pedestrians, cyclists and bridleway user delay; • Decline in highway safety; • Fear and intimidation and reduction in pedestrian, cyclist, and equestrian amenity; • Increased pedestrian, cyclist and equestrian journey length; and • Increased risk of accidents caused by hazardous loads.	The Scoping Report seeks to scope out traffic impacts relating to operation and maintenance of the Proposed Development on the basis that operational and maintenance traffic from overhead line projects would be expected to be substantially lower than 30% of existing traffic and movements and is therefore not anticipated to have a material effect on the transport network and receptors. The Inspectorate notes from the description of maintenance activities at Section 4.5 of the Scoping Report that this would comprise maintenance, minor repairs and modifications and refurbishment, with access primarily by foot patrol, van, pickup truck or air (drone/ helicopter) with possibly some HGVs at CSECs. Based on the information in the Scoping Report, the Inspectorate agrees that significant effects are unlikely from an increase in road traffic and/ or other impacts to the road network and is content to scope these matters out of the ES. The description of the Proposed Development in the ES should explain the likely number and nature of vehicle movements to provide confidence for excluding these matters from more detailed assessment. The Inspectorate draws the Applicant's attention to ID 2.1.11 of this Opinion. The Inspectorate considers that the traffic movements considered against the relevant thresholds should be a combination of total movements for both operation and maintenance activities referred to within the Scoping Report.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.2	Table 13.7	Increased driver delay on PRoW, national/regional walking/cycling and bridleway routes – Construction	The Applicant proposes to scope this matter out on the basis that PRoW and walking and cycling routes are not utilised by drivers. Given the lack of impact pathway present for increased driver delay on the listed receptors, the Inspectorate agrees to scope this matter out from further assessment.
3.8.3	Table 13.7	Decline in highway safety on PRoW, national/regional walking/cycling and bridleway routes – Construction	The Applicant proposes to scope this matter out on the basis that this impact relates only to collisions on the highway. Given the lack of impact pathway present for a decline in highway safety on the listed receptors, the Inspectorate agrees to scope this matter out from further assessment.
3.8.4	Table 13.7	Increased pedestrian, cyclist and equestrian journey length on road links and junctions – Construction	The Applicant proposes to scope this matter out on the basis that this impact does not relate to the road network. Given the lack of impact pathway present for increased pedestrian, cyclist and equestrian journey length on road links and junctions, the Inspectorate agrees to scope this matter out from further assessment.
3.8.5	Table 13.7	Increased risk of accidents caused by hazardous load on PRoW, national/regional walking/cycling and bridleway routes – Construction	The Applicant proposes to scope this matter out on the basis that hazardous loads would not use PRoW, national/regional walking/cycling and bridleway routes. Given the lack of impact pathway present for increased risk of accidents cause by hazardous loads on the listed receptors, the Inspectorate agrees to scope this matter out from further assessment.
3.8.6	Paragraph 13.9.6	Rail network	The Applicant proposes to scope out an assessment of railway network from the traffic and transport assessment on the basis that crossing methods would be employed to avoid any potential impacts

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			on the railway, and that any vehicle crossing points of the railway (if required) will be managed to ensure operational rail safety. Given the stage of the Proposed Development and the lack of information on where the cable route may cross railway infrastructure and the crossing methods that could be used, and the need for any road crossings, the Inspectorate considers that there is insufficient evidence at this stage to scope this matter out of the assessment. The ES should include an assessment of the potential impacts to the railway network and operational rail safety, where there is potential for likely significant effects to occur. The assessment should also consider the potential impacts of any temporary closures required to facilitate construction activities on the rail network. The Applicant should make effort to agree the approach to assessment with relevant consultation bodies including Network Rail. The Applicant's attention is drawn to the consultation response from Network Rail (Appendix 2 of this Opinion) in this regard.

ID	Ref	Description	Inspectorate's comments
3.8.7	Paragraph 4.5.2	Abnormal loads	The Scoping Report sets out that the Construction Traffic Management Plan (CTMP) would include measures to manage abnormal loads. The Inspectorate recommends that an assessment of the suitability of access routes to accommodate abnormal loads is undertaken. This assessment should consider the worst-case number of abnormal loads and types of vehicles required. The outcome of this assessment should be reported in the ES, together with confirmation of any measures required to mitigate significant adverse effects arising from this matter.

ID	Ref	Description	Inspectorate's comments
3.8.8	Paragraph 13.7.2	Transport modes	The Inspectorate recommends the consideration of water-borne or rail transportation over road transport in line with the Overarching National Policy Statement for Energy (EN-1). The Applicant's attention is drawn to the consultation response from the Canal and River Trust (Appendix 2 of this Opinion) in this regard.
3.8.9	Table 13.8	Waterways	The receptors listed in Table 13.8 does not include consideration of users of waterways. The study area of the Proposed Development crosses several watercourses, there is potential for navigational, and disruption impacts to users of these waterways including marine users and users of the canal network. The ES should consider potential impacts to affected waterways. The potential impact on these crossings such as canal closures to facilitate construction upon navigable crafts on the canals should be considered within the ES. The Applicant's attention is drawn to the response from the Canal and River Trust and the Maritime and Coastguard Agency (Appendix 2 of this Opinion) in this regard.
3.8.10	Table 13.4	Guidance	The technical guidance referred to within Table 13.4 lists the Institute of Environmental Management (IEMA) Guidelines for the Environmental Assessment of Road Traffic (GEART). The Inspectorate considers that the assessment undertaken in the ES should utilise the latest IEMA Guidance: Environmental Assessment of Road Traffic and Movement 2023.

3.9 Air Quality

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Table 14.3	Increase in local air pollutant concentrations due to emissions from Non-Road Mobile Machinery (NRMM) – Construction	The Applicant proposes to scope out this matter for the phase identified on the basis that significant effects are not likely, due to the temporary and transient nature of activities and incorporation of best practice measures (CoCP) and compliance with NRMM standards. However, this will be confirmed following review of updated information in the air quality assessment. The Inspectorate is content that this matter can be scoped out subject to confirmation of the type, nature and duration of plant and machinery to be used in the construction phase and the range of measures to minimise effects on air quality, to be secured through the relevant control documentation.
3.9.2	Table 14.3	Dust deposition and health impacts from elevated PM_{10} concentrations due to dust generating activities on nearby air quality sensitive receptors – Operation (maintenance activity)	The Applicant proposes to scope out this matter for the phase identified on the basis that significant effects are not likely, due to the infrequent, temporary and transient nature of activity and the incorporation of best practice measures (CoCP). The Inspectorate draws the Applicant's attention to ID 2.1.11 of this Scoping Opinion. The Inspectorate is content to scope out the specific maintenance activities that are planned to occur during the operational phase in relation to the receptors identified on the basis of the proposed low-level activity and subject to the incorporation of best practice measures (CoCP).
3.9.3	Table 14.3	Increase in local air pollutant concentrations and nitrogen deposition rates on nearby air quality sensitive receptors as a	The Applicant proposes to scope out this matter for the phase identified on the basis that significant effects are not likely, as vehicle trips associated with the operation and maintenance phases are anticipated to be below the IAQM screening criteria and therefore

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		result of vehicle emissions – Operation (maintenance activity)	impacts are considered to be not significant. However, this will be confirmed following review of updated information in the air quality assessment. The Inspectorate draws the Applicant's attention to ID 2.1.11 of this Scoping Opinion. The Inspectorate is content to scope out the specific maintenance activities that are planned to occur during the operational phase in relation to the receptors identified on the basis of the low-level activity proposed and subject to the updated information in the air quality assessment confirming that significant effects would not be likely.
3.9.4	Table 14.3	Increase in local air pollutant concentrations due to emissions from NRMM on nearby air quality sensitive receptors - Operation (maintenance activity)	The Applicant proposes to scope out this matter for the phase identified on the basis that significant effects are not likely, due to the infrequent, temporary and transient nature of activity during the phase and the incorporation of best practice measures (CoCP) and compliance with NRMM standards. The Inspectorate draws the Applicant's attention to ID 2.1.11 of this Scoping Opinion. The Inspectorate is content to scope out the specific maintenance activities that are planned to occur during the operational phase in relation to the receptors identified on the basis of the low-level activity proposed and subject to the incorporation of best practice measures (CoCP) and compliance with NRMM standards.

ID	Ref	Description	Inspectorate's comments
3.9.5	Chapter 14	NRMM	The Inspectorate advises that the power of NRMM, where required, should meet or not exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended).

3.10 Noise and Vibration

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Table 15.3	Vibration impact on structures due to construction activities – Construction	The Applicant proposes to scope out this matter for the phase identified on the basis that construction vibration would not be expected to cause damage to buildings or structures unless very high levels of vibration are generated within approximately 10m, although this would be reviewed during the iterative design process and avoided where possible. The Inspectorate considers that there is insufficient information at present to scope this matter out from further assessment.
3.10.2	Table 15.3	Vibration impact at Noise Sensitive Receptors (NSRs) due to construction traffic – Construction	The Applicant proposes to scope out this matter for the phase identified on the basis that vibration from traffic on the public highway is caused by irregularities in the road surface. Where the road surface is free from irregularities, such as potholes, significant vibration effects would not be expected, even at relatively short distances. The Inspectorate considers that there is insufficient information at present to scope this matter out from further assessment.
3.10.3	Table 15.3	Noise impact at NSRs from the overhead line – Operation	The Applicant proposes to scope out this matter for the phase identified on the basis that operational noise from the overhead line is not likely to be significant at nearby NSRs under any weather conditions owing to the proposed 'triple Araucaria' conductor bundle (Section 15.5 of the Scoping Report). The Applicant also proposes that, should the iterative design process result in alternative conductor types being used, consideration for this would be assessed

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			within the noise and vibration assessment and technical information would be submitted as part of the application for development consent to support scoping out noise associated with overhead lines from the noise and vibration assessment. The Inspectorate is content with this approach, however, should alternative conductor types be proposed, the Applicant should submit further technical information as part of the development consent to support scoping out this matter from the noise and vibration assessment.
3.10.4	Table 15.3	CSEC Noise impact at NSRs – Operation	The Applicant proposes to scope out this matter for the phase identified on the basis that the source of operational noise is the same as that from an overhead line (i.e. which would be 'practically quiet' during operation) and therefore significant effects would not be likely. The Inspectorate is content with this approach.
3.10.5	Table 15.3	Noise impact at NSRs due to underground cables – Operation	The Applicant proposes to scope out this matter for the phase identified on the basis that underground cables are practically quiet and therefore not considered likely to cause significant effects. The Inspectorate is content with this approach.
3.10.6	Table 15.3	Vibration impact at NSRs due to operational vibration – Operation	The Applicant proposes to scope out this matter for the phase identified on the basis that there are no sources of operational vibration proposed as part of the Proposed Development. The Inspectorate is content with this approach subject to no sources of operational vibration proposed for the phase identified.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.7	Table 15.3	Noise or vibration impact at NSRs due to maintenance for the overhead line, potential underground cables, cable sealing end compounds, and/or tunnel head houses – Operation (maintenance activity)	The Applicant proposes to scope out this matter for the phase identified on the basis that the maintenance of the overhead line, underground cables, and substations would be infrequent and localised and short term in duration. Maintenance activities would follow standard measures to reduce noise and vibration where required. The Inspectorate draws the Applicant's attention to ID 2.1.11. The Inspectorate is content to scope out the specific maintenance activities that are planned to occur during the operational phase in relation to the receptors identified on the basis of low-level activity associated with the phase identified and subject to the implementation of standard measures to reduce noise and vibration where required.

ID	Ref	Description	Inspectorate's comments
3.10.8	Table 15.4	Errata – References to Table 15.4	Table 15.4 refers only to Table 15.4. The Inspectorate assumes this is a typographical error and this should refer to Table 15.3. The Applicant should ensure that all cross-references within the ES are correct.
3.10.9	Chapter 15	Scope of Assessment – Vibration monitoring	The Inspectorate advises that vibration from the installation of structures may adversely affect flood defences, therefore vibration monitoring should be scoped into further assessment to ensure that the associated vibrations will not adversely affect any flood defence structures. Depending on proximity, vibration from HGV traffic/plant may also be necessary.

3.11 Socio-economics, Recreation and Tourism

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Table 16.3	Potential temporary and permanent adverse land take or amenity impacts on agricultural land leading to potential disruption to agricultural businesses and loss of agricultural land for users – Construction and Operation (maintenance activities)	The Applicant proposes to scope this matter out on the basis that all land take from private holdings would be mitigated through mutually agreed financial compensation to landowners and in line with the terms of any tenancy agreements. On the basis of these compensation agreements being implemented and evidence of final agreements being provided with the application documents, the Inspectorate agrees to scope these matters out from further assessment. If such evidence is not available, then the Inspectorate considers that this matter should be assessed in the ES. The Inspectorate draws the Applicant's attention to ID 2.1.11 of this Opinion regarding the maintenance phase.
3.11.2	Table 16.3	Potential creation of permanent operational phase employment, training and apprenticeship opportunities, both directly at work sites and indirectly in the supply chain leading to gross value added (GVA) impacts across the supply chain – Operation	The Applicant proposes to scope this matter out on the basis that the scale of operational employment generated is likely to be very limited. The Inspectorate agrees, given the nature of the Proposed Development, that it is unlikely to generate employment, training or apprenticeship opportunities that would result in a significant increase in the GVA of the study area as described at paragraph 16.4.9 of the Scoping Report. The Inspectorate considers it is therefore unlikely to result in significant effects and agrees that this matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.3	Table 16.3	Potential generation of GVA during the operation leading to permanent GVA impacts across the North Lincolnshire, East Riding of Yorkshire and Bassetlaw local authority economies – Operation	The Applicant proposes to scope this matter out on the basis that the scale of operational employment generated is likely to be very limited and therefore any effect on GVA will be small. The Inspectorate considers that given the maintenance activities set out in Section 4.5 of the Scoping Report, it agrees to scope out an assessment of potential generation of GVA during the operation leading to permanent GVA impacts across the local authority economies during operation.

ID	Ref	Description	Inspectorate's comments
3.11.4	Section 16.3 and Paragraphs 16.3.1 to 16.3.6	Study area	Paragraph 16.3.1 of the Scoping Report sets out that the study areas for socio-economic, recreation and tourism vary dependent on the likely spatial extent of the effect under consideration. Paragraphs 16.3.2 to 16.3.6 set out the proposed study areas. The Inspectorate considers that the study area should not be limited to solely the local authority spatial areas which the Scoping Boundary falls within; it should take into account the workforce profile and supply chain area and be informed by the Zone of Influence (ZoI) of the Proposed Development and other aspect assessments (eg landscape and visual, traffic and transport). The Applicant should seek to agree the study area with the relevant local authorities.
3.11.5	Paragraphs 16.6.3 and 16.7.14	Economy and employment	Consideration should be given to the availability and origin of the workforce in the context of the numerous projects proposed in the region. Any assumptions around workforce origins within the socio-economic assessment should be used to inform the study area and also be reflected in the assessment of transport impacts.

ID	Ref	Description	Inspectorate's comments
3.11.6	N/A	Receptors	The ES should give consideration to the Proposed Development's landscape and visual impacts to the waterway network and the potential economic effects this will have on attracting visitors to the area. The Applicant's attention is drawn to the consultation response from the Canal and River Trust (Appendix 2 of this Opinion) in this regard.

3.12 Health and Wellbeing

(Scoping Report Section 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	Table 17.4	Potential impacts of EMFs on local residents and workers – Operation	The Applicant proposes to scope this matter out on the basis that the Applicant will ensure that policies and procedures are in place at the design phase to ensure that all equipment will comply with public EMF exposure limits. The Inspectorate considers that the ES should provide evidence that these polices, and procedures are in place and confirm that receptors will not be impacted by potential sources of EMF. In the absence of such evidence, the Inspectorate considers that the ES should provide an assessment of the impact of EMF on local residents and workers where there is potential for likely significant effects to occur. Although not explicably requested, the Inspectorate agrees to scope out an assessment of EMFs during the construction phase on the basis that they are associated with operational power distribution.
3.12.2	Paragraph 17.6.6	Health determinants for diet and nutrition, housing and relocation – Construction and Operation	The Applicant proposes to scope out these health determinants on the basis that they are unlikely to be affected by the Proposed Development. The Inspectorate agrees to scope these matters out, however, should housing and relocation be affected by the Proposed Development this should be detailed within the ES and an assessment provided where there is the potential for likely significant effects to occur.

ID	Ref	Description	Inspectorate's comments
3.12.3	Tables 17.6 and 17.7	Determination of sensitivity and magnitude for PRoW and recreational routes	It is unclear how the frequency of use for PRoW and recreational routes will be determined. The Inspectorate considers that the determination of sensitivity and magnitude of impact on for these routes should include reference to its usage. The ES should clearly set out the data sources and any surveys utilised in determining the sensitivity and magnitude of these routes. The Applicant's attention is drawn to the UK Health Security Agency's response (Appendix 2 of the Opinion) in this regard.

3.13 Climate Change

(Scoping Report Section 18)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.13.2	N/A	N/A	N/A

3.14 Major Accidents and Disasters

(Scoping Report Section 19)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.14.1	Table 19.3	Potential vulnerability of the Proposed Development to a major accident or disaster as set out in Appendix 19.A of the Scoping Report - All phases	The Applicant proposes to scope out this matter on the basis that the vulnerability of the Proposed Development to major accidents and disasters can be mitigated or reduced by the processes and standards in place. The Inspectorate is content with this approach, subject to processes and standards identified within Section 19 of the Scoping Report being secured and implemented.
3.14.2	Table 19.3	Potential for the Proposed Development to exacerbate existing hazard as set out in Appendix 19.A of the Scoping Report – All phases	The Applicant proposes to scope out this matter on the basis that the Proposed Development is unlikely to generate any potential significant effects on the environment if a major accident or disaster were to occur. The Inspectorate is content with this approach.

ID	Ref	Description	Inspectorate's comments
3.14.3	N/A	N/A	N/A

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES[1]

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Integrated Care Board	NHS Humber and North Yorkshire Integrated Care Board
	NHS Nottingham and Nottinghamshire Integrated Care Board
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Humberside Fire and Rescue Service
	Nottinghamshire and City of Nottingham Fire and Rescue Service
The relevant police and crime commissioner	Humberside Police and Crime Commissioner
	Nottinghamshire Police and Crime Commissioner
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Marham Parish Council
	Treswell Parish Council
	South Leverton Parish Council
	North Leverton with Habblesthorpe Parish Council
	Sturton Le Steeple Parish Council
	Gringley on the Hill Parish Council

[1] Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
	East Drayton Parish Council
	Headon cum Upton, Grove and Stokeham Parish Council
	Rampton and Woodbeck Parish Council
	North and South Wheatley Parish Council
	Beckingham cum Saundby Parish Council
	Walkeringham Parish Council
	Misterton Parish Council
	Dunham with Ragnall, Fledborough and Darlton Parish Council
	West Stockwith Parish Council
	Twin Rivers Parish Council
	South Cave Parish Council
	Rowley Parish Council
	Blacktoft Parish Council
	Broomfleet Parish Council
	Ellerker Parish Council
	Brantingham Parish Council
	Skidby Parish Council
	Woodmansey Parish Council
	Belton Parish Council
	Haxey Parish Council
	Epworth Parish Council
	Owston Ferry Parish Council
	West Butterwick Parish Council
	Crowle and Ealand Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Eastoft Parish Council
	Amcotts Parish Council
	Luddington and Haldenby Parish Council
	Garthorpe and Fockerby Parish Council
	Keadby with Althorpe Parish Council
The Environment Agency	The Environment Agency
The Maritime and Coastguard Agency	Maritime & Coastguard Agency
The Maritime and Coastguard Agency - Regional Office	The Maritime and Coastguard Agency - Hull
The Marine Management Organisation	Marine Management Organisation (MMO)
The Civil Aviation Authority	Civil Aviation Authority
Integrated Transport Authorities (ITAs) and Passenger Transport Executives (PTEs)	Sheffield City Region Combined Authority
The Relevant Highways Authority	North Lincolnshire Council Highways Authority
	East Riding of Yorkshire Council
	Nottinghamshire County Council
The relevant strategic highways company	National Highways
The Coal Authority	The Coal Authority
The relevant internal drainage board	Ouse and Humber Drainage Board
	Doncaster East Internal Drainage Board
	Goole Field District Drainage Board
	Isle of Axholme and North Nottinghamshire Water Level Management Board
	Trent Valley Internal Drainage Board

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Canal and River Trust	The Canal and River Trust
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	The Forestry Commission
The Secretary of State for Defence	Ministry of Defence

TABLE A2: RELEVANT STATUTORY UNDERTAKERS[2]

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Humber and North Yorkshire Integrated Care Board
	NHS Nottingham and Nottinghamshire Integrated Care Board
The National Health Service Commissioning Board	NHS England
The relevant NHS Trust	East Midlands Ambulance Service NHS Trust
	Yorkshire Ambulance Service NHS Trust
The relevant NHS Foundation Trust	Nottinghamshire Healthcare NHS Foundation Trust
	Humber Teaching NHS Foundation Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Canal Or Inland Navigation Authorities	The Canal and River Trust
Dock and Harbour authority	Associated British Ports

[2] 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Anglian Water
	Severn Trent
	Yorkshire Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Last Mile Gas Ltd
	Leep Gas Networks Limited

STATUTORY UNDERTAKER	ORGANISATION
	Quadrant Pipelines Limited
	Squire Energy Limited
	National Gas
The relevant electricity distributor with CPO Powers	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	Northern Powergrid (Northeast) Limited
	Northern Powergrid (Yorkshire) plc
	National Grid Electricity Distribution (East Midlands) Limited
	National Grid Electricity Transmission Plc
	National Grid Electricity System Operation Limited

TABLE A3: SECTION 43 LOCAL AUTHORITIES (FOR THE PURPOSES OF SECTION 42(1)(B))[3]

LOCAL AUTHORITY[4]
Newark and Sherwood District Council
West Lindsey District Council
Bolsover District Council
Mansfield District Council
City of York Council
Doncaster Metropolitan Borough Council
Rotherham Metropolitan Borough Council
North Yorkshire Council
Hull City Council
North East Lincolnshire Council
Nottinghamshire County Council
Lincolnshire County Council
East Riding of Yorkshire Council
Bassetlaw District Council
North Lincolnshire Council
Nottingham City Council
Derbyshire County Council
Leicestershire County Council

TABLE A4: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION

[3] Sections 43 and 42(B) of the PA2008

[4] As defined in Section 43(3) of the PA2008

South Yorkshire Mayoral Combined Authority
The Royal Lifeboat Institution

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Blacktoft Parish Council
Broomfleet Parish Council
Canal and River Trust
Crowle and Ealand Town Council
Dunham-on-Trent, Ragnall, Fledborough and Darlton Parish Council
Ellerker Parish Council
Environment Agency
Historic England
Lincolnshire County Council
Maritime and Coastguard Agency
NATS Safeguarding
Natural England
Network Rail
Newark and Sherwood District Council
North and South Wheatley Parish Council
North Leverton with Habblesthorpe Parish Council
North Lincolnshire Council
Northern Gas Networks
Nottinghamshire County Council
Rotherham Metropolitan Borough Council
Royal Mail
South Cave Parish Council

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
South Leverton Parish Council
South Yorkshire Mayoral Combined Authority
The Coal Authority
UK Health Security Agency

From: Clerk clerk

To: North Humber to High Marnham

Subject: Re: EN020034 - North Humber to High Marnham - EIA Scoping Notification and Consultation

Date: 14 September 2023 09:26:02

BLACKTOFT PARISH COUNCIL

The Joiners Shop, Blacktoft

DN14 7YW

E R Yorkshire

Tel.: [redacted]

email: clerk@blacktoft.org.uk

Dear [redacted]

Thank you for your correspondence of 21 August 2023. Blacktoft Parish Council, local landowners and residents have all had the opportunity to read and discuss ALL items put before them plus attending presentations by NATIONAL GRID regarding the pylons. As much as it is essential to have more electricity power supply it does not necessarily mean anything goes and that the pylons are imposed without consideration being given to the local residents and businesses.

Blacktoft parish is a large mainly agricultural parish with a small population on the north bank of the river Ouse - at the point where the river Trent, The Humber and the river Ouse all meet. The neighbouring parish along the river bank towards the North Sea is Broomfleet. There are 250 electors on the electoral roll. A large flat area of land with a small population. Otherwise known as a flood plan.

In 2013 the tidal surge hit this riverbank and Blacktoft parish was flooded badly - at least 75% land flooded and a very high percentage of riverside and some inland properties were flooded - 60% approximately - with damage and loss of livestock. The engineered riverbank held but in some places did break. These identified places historically caused by manmade intervention - repairs, building work etc. The spectre of flooding is always with the residents of Blacktoft parish. Blacktoft Parish Council would like to know that if a pylon or perhaps

pylons are to be placed on or as near to the riverbank to cause a problem - that everything will be done to put the land back to the highest engineered standard. The large pylon currently takes cable across the river at Yokefleet and Ousefleet (south bank). Placing a pylon - larger or smaller than the current one(s) - would impact on residents of the settlement of Yokefleet.

The line of pylons coming down off the Yorkshire Wolds onto the flood plain is visible from every household in the parish. The line of pylons going over the river and across the south side to the Lincolnshire Wolds will also be visible to residents. It has to be agreed that not everyone will be pleased to have such 'industrialised' items placed in full view. The parish council would like to see some consideration given to the visual impact of a second line of pylons. It is also understood that the capacity needed will not be met by the siting of a

second line of pylons and that perhaps in a few years time a third line will be needed to be sited. Blacktoft Parish Council would like to know what the capacity will be with a second line of pylons for, say, 2040-2050.

The parish council would also like to see some consideration given to the design of the pylons and the placement of the pylons. With the pylons being sited away from residents and their homes. There are also some concerns regarding how the line will be crossed to change direction.

Over the years there has also been some bird strike incidents. Some documented and some not. Perhaps there have been more but they have never been documented or reported to the parish council. The R S P B Bird Sanctury on the south bank - Blacktoft Sands - is a very important site for wild birds, both resident and migratory. The whole of this riverbank area is part of a Site of Special Scientific Interest (S S S I) and others. Blacktoft Parish Council would like to see every effort be made to ensure there is no detrimental impact on the bird

sanctury any the S S S I interests.

There is also concern that farm land will be 'lost' to more pylons being placed in the parish. It will be very concerning should a third line of pylons be needed in the future. As this is a large agricultural parish the parish council would like to have all comments, questions and suggestions put to the NATIONAL GRID regarding this proposal taken seriously and with the best outcome for the parish, its farmers and residents. On the ground and financially. Everyone in Blacktoft parish (as in all parishes) will be affected by a second (or third) line of

pylons and as such there should be some sort of local/community based compensation scheme for the benefit of the local communities.

Then there is the question constantly being asked - 'Why can't the cable be channelled underground and under water?' Another question is and so far has not been answered by anyone representing NATIONAL GRID - 'Why is there such a divergence in the proposed line at Oxmardyke in Blacktoft parish?'

The impact of construction of these pylons will be immense on this small population and on farming activities. It would no doubt impact on the local wildlife too. The parish is a quiet, peaceful and very beautiful area and is important to residents and visitors alike for its wellbeing properties. If this proposal for more pylons does go ahead it is hoped it will be with the interests of residents and farmers and businesses in mind.

Thank you.

Yours sincerely

on behalf of Blacktoft Parish Council

[redacted]

Clerk

----- Original Message -----

From: "North Humber to High Marnham" <NorthHumbertoHighMarnham@planninginspectorate.gov.uk>

Sent: Monday, 21 August, 2023 15:44:36

Subject: EN020034 - North Humber to High Marnham - EIA Scoping Notification and Consultation

FAO: Parish Clerk

Dear Sir/Madam,

We are contacting you at this time in relation to the proposed North Humber to High Marnham project which is a Nationally Significant Infrastructure Project (NSIP). NSIPs are defined in Part 3, Regulation 14 of the Planning Act 2008, and are projects of certain types, over a certain size, which are considered by the Government to be so big and nationally important that permission to build them needs to be given at a national level, by a responsible Secretary of State. A summary of the NSIP planning process can be found in the list of links at the

bottom of this page. This project is currently in the pre-application stage.

To meet the requirements of the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations (2017) ("the EIA Regulations"), NSIPs which are likely to have a significant effect on the environment are required to undertake an EIA and to provide an Environmental Statement (ES) to accompany the application. An ES will set out the potential impacts and likely significant effects of the Proposed Development on the environment. Schedule 4 of the EIA Regulations sets out the general information for inclusion within an ES. You can

find out more detail on ES documents and the EIA process in the links at the bottom of this page.

To inform the scope and level of detail of the information to be provided within the ES, the Applicant has requested a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State under Regulation 10 of the EIA Regulations.

Before adopting a Scoping Opinion, the Inspectorate must consult the relevant 'consultation bodies' defined in the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (see link below). You have been identified as a consultation body for this project, please see attached correspondence. Both Local Planning Authorities and Parish/Town Councils play an important role in the planning process by providing area specific knowledge and representing local communities. The Applicant must have regard to comments

made within the Scoping Opinion as the submitted ES must be based on the most recently adopted Scoping Opinion. Therefore, your comments at this stage are valuable at influencing the scope of the ES by reviewing the Applicant's approach to EIA as set out within their Scoping Report. Please note this consultation relates solely to the EIA Scoping process. Please rest assured that there are further opportunities for you to engage with and provide views on the project more generally, including through the Applicant's own consultation. Applicants

have a duty to undertake statutory consultation and are required to have regard to all responses to their statutory consultation.

Please note the deadline for consultation responses is 18 September 2023 and is a statutory deadline which cannot be extended. Responses submitted before the deadline will be considered, and published at the end of the Scoping Opinion, by the Planning Inspectorate.

For further information about the NSIP planning process, please click on the links below:

* Overview of the NSIP Planning
Process<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-

[redacted]

[cid:image001.png@01D9D446.25486140]

[redacted] | EIA Advisor

The Planning Inspectorate

T [redacted]

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data=05%7C01%7CNorthHumbertoHighMarnham%40planninginspectorate.gov.uk%7C668da0549fd84075e69f08dbb4fc397a%7C5878df986f8848ab9322998ce557088d%7C0%7C0%7C638302767615663123%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=B6EAyYjE1CcuyARi9guDGUUeYmgQ%2BWqh%2FiQlVZV3Ids%3D&reserved=0> [Icon Description automatically generated]

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data=05%7C01%7CNorthHumbertoHighMarnham%40planninginspectorate.gov.uk%7C668da0549fd84075e69f08dbb4fc397a%7C5878df986f8848ab9322998ce557088d%7C0%7C0%7C638302767615663123%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=kQItNA1hy46BzywwqLjR10pCESdhkBsorLKPfuD7VDg%3D&reserved=0>

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Please take a moment to review the Planning Inspectorate's Privacy Notice which can be accessed by clicking this link.<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fgovernment%2Fpublications%2Fplanning-inspectorate-privacynotices&

data=05%7C01%7CNorthHumbertoHighMarnham%40planninginspectorate.gov.uk%7C668da0549fd84075e69f08dbb4fc397a%7C5878df986f8848ab9322998ce557088d%7C0%7C0%7C638302767615663123%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=uxtre5DcYaZt35hkkhRENT4ktqYVXKnoUcu1EYBTz5I%3D&reserved=0>

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DPC:76616c646f72

[Environmental advice image with text saying please consider the environment before printing this email]

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Thank you.
Yours sincerely
on behalf of Blacktoft Parish Council

From:	broomfleet parish
To:	North Humber to High Marnham
Subject:	Broomfleet Parish Council EIA Scoping Response.
Date:	18 September 2023 21:18:01
Attachments:	Blacktoft Parish council EIA Response.docx Ellerker Parish - EN020034 - North Humber to High Marnham - EIA Scoping Notification and Consultation 08.09.23.docx

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Dear All,

Thank you for your correspondence on the 21st August regarding the EIA scoping, Broomfleet Parish council and local residents met to discuss the proposal's brought by National grid regarding the North Humber to high marnham project. Please find attached correspondence from Blacktoft Parish Council & Ellerker Parish council that we fully support them in their positions and have similar concerns which we would like logging.
Namely the concerns regarding the local wildlife, The Humber Estuary on the North bank trying to get the status as a UNESCO East Atlantic Highway site, also the proximity to the village which already has Pylons situated very closely.

Kind Regards,



Broomfleet Parish Council Clerk.

Canal & River Trust
Making life better by water

Your Ref EN020034

Our Ref IPP-203

Friday 15th September 2023

BY EMAIL ONLY northhumbertohighmarnham@planninginspectorate.gov.uk

Dear Sirs

EN020034 he North Humber to High Marnham Project – EIA Scoping Consultation: 21st August - 18 September 2023

Thank you for your consultation on the Environmental Impact Assessment Scoping report, which relates to the proposed North Humber to High Marnham Project to re-enforce the Electricity Transmission Network, which includes works to install a new 400 kV OHL (overhead power line) route, approximately 90 km in length and works to reconfigure a section of the existing 400 kV OHL to the east of Crowle and west of Keadby Power Station.

The Canal & River Trust are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation.

The Trust are landowner and Navigation Authority for both the Stainforth & Keadby Canal and the Chesterfield Canal. The waterways are included within the development boundary of the project, and we understand are proposed to be crossed by the new cable route. The Stainforth & Keadby Canal is classified as a freight waterway, and can accommodate large craft.

Having reviewed the Scoping Document, we wish to raise the following comments.

The Stainforth & Keadby and Chesterfield Canals both run on an almost east-west alignment across the line of the proposed overhead power line. As land owner/ operator of the canal the Trust wish to see any potential impacts on the canal and its users fully identified and addressed within the Environmental Statement.

The Scoping Report provides information on the likely nature and form of the proposed development and identifies areas of potential impacts. The proposed methodologies identified in the report appear to be broadly appropriate.

Canal & River Trust
Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN
T 0303 040 4040 E canalrivertrust.org.uk/contact-us W canalrivertrust.org.uk

Patron: H.R.H. The Prince of Wales. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792, registered office address First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB

Undergrounding Works

A unique attraction of our waterways are based on its visual amenity value, in addition to its significance as a heritage and wildlife corridor and as a sustainable transport route. It is essential that the amenity value of our canals are protected and that no development takes place that may adversely affect the experience of waterway users. The canal towpaths provides a popular route for leisure and recreation, and provide a public right of way and cycle route.

We understand from the Scoping report that the majority of works will take place above ground, which would include above-ground crossings of the canal network. The main exception would be in and around Keadby Power Station, where undergrounding is proposed to cross an existing cable.

We would request that the nature of the works in relation to the canal should be provided as part of the submission so that any impact on the structure of the Stainforth & Keadby Canal, which could lie in close proximity, can be considered.

Paragraph 4.2.38 highlights that undergrounding works will be considered in some locations where necessary to mitigate an environmental effect that cannot be reduced to an appropriate level through other measures.

We request that the Environmental Report should provide further clarity about where the line will be undergrounded elsewhere. Notably, we request that a full assessment should be provided with regards to the amenity impacts of an overhead crossing of both the Stainforth & Keadby and Chesterfield Canals and request that this should consider whether the benefits of undergrounding the particular section of the line across our waterways could outweigh the harm of providing the line above ground.

Due to the designation of the canal as a Site of Special Scientific Interest (SSSI), proximity to Heritage Assets, absence of tree coverage and absence of existing nearby cable or pipe crossings, we anticipate that the Chesterfield Canal would be especially sensitive to the impact of a cable crossing for reasons discussed below.

Landscape and Visual Effects (Chapters 6 and 7)

An above ground installation would cross our network in two locations, which will carry both long term landscape/visual impacts and disturbance implications to facilitate construction. Indeed, paragraph 7.8.2 identifies that there visual receptors affected by the project would include recreational receptors on the waterways including rivers and canals.

Table 7.6 highlights that the Environmental Statement will include an assessment of the impact of construction and operation works on people using Public Rights of Way (PRoW) and waterways (within 3 km of the Project), which we understand will include an assessment of our network.

The Scoping Report highlights that the design of the new project will seek to accord with the aims of National Policy Statement EN-1 and EN-5 through the adoption of the Holford Rules (Ref 2.20) and Horlock Rules (Ref 2.21).

We wish to highlight that the nature of the landscape next to our waterways, which is flat, with limited tree cover, would limit the opportunity to adopt certain parts of the Holford Rules concerning cable routing. For example, rule 4 of the Holford Rules requires above ground cable routes to choose tree and hill backgrounds, whilst rule 5 seeks cable routes to prefer open valleys with woods to limit the apparent scale and height of new cable routes. The landscape next both canals would not allow for the adoption of either of these rules.

Consideration should be given with the Environmental Report specifically as to the visual impact of new cable crossings of our network where the local landscape does not provide for easy visual mitigation of the works. Specific mitigation should be identified, especially next to the Chesterfield canal, to ensure that the visual impact

Canal & River Trust
Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN
T 0303 040 4040 E canalrivertrust.org.uk/contact-us W canalrivertrust.org.uk

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on the landscape in this location is visually acceptable. The potential for undergrounding works should be considered as one option.

Canal users would pass the position of new crossings at a relatively low speed, and would be susceptible to changes to the local landscape. **We request that the Visual Impact Assessment proposed should include an assessment of the proposed changes to the landscape at both canal crossing locations.** Within Appendix 6, table 6.A.2.2 provides indicators of landscape receptor susceptibility. The list appears broadly appropriate. We wish to highlight that our canals have local heritage value (due to their age and association with historic industrial development in the areas they run), as well providing spaces of recreational and ecological/biodiversity value (including the SSSI designation for the Chesterfield Canal). These highlight that the canals have High to Very High landscape value, and should be considered accordingly.

With respect to the Visual Assessment described in Chapter 7, **we request that our canals (notably at the position of any proposed crossing) should be included as viewpoints within the associated assessment**. This would be necessary to ensure that the impact on our network and its associated users can be fully made. Identification of heritage assets, waymarked walks, and other attractions along the canal is also crucial in assessing the visual impact assessment on the canal's amenity value, significance and setting.

The scoping report states that lighting impacts are will be assessed. There is a risk that lighting near the our network could distract boaters at dusk. We therefore request that more clarity should be provided with regards to the location of lighting and potential impact on our waterways as part of the assessment.

Ecology and Biodiversity (Chapter 8)

Both the Chesterfield and Stainforth & Keadby Canals offer a potential habitat for waterborne species, potentially including amphibians, mammals (including otter), fish and waterborne plants. We understand that the Environmental Report will be supported with a study of biodiversity and habitats, and that the canals are is included in the study boundary.

As identified within the submission a section of the Chesterfield Canal is a designated Site of Special Scientific Interest (SSSI) Although the canal is designated primarily for aquatic wildlife, it is also important as a flight line for birds and bats. **Therefore, it must be ensured that any cable crossings have measures in place that reduce the chance of cable strikes by birds.** Additionally, any construction phase activities should be kept away from the canal corridor to minimise any disturbance to the corridor. Appropriate physical measures such as flight deflectors must be used to ensure that harm to birds as a result of colliding with the overhead lines is minimised.

The Scoping Report highlights the key potential impacts from the works, which include habitat loss in proximity to the Chesterfield Canal SSSI. **We request that the report should include a full assessment of the extent of vegetation loss necessary, and any identified mitigation.**

Should piling works be proposed for any pylons, we wish to highlight that such works can result in disturbance from vibration. As a result, we believe the impact should be included as part of the overall assessment.

Cultural Heritage (Chapter 9)

Due to their age and association with historic industrial development, **our canal network does form a heritage asset, and impacts upon the value and setting of this asset should be considered as part of the Environmental Statement.**

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Patron: H.R.H. The Prince of Wales. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792, registered office address First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB

The proposed line also would lie in close proximity to several designated assets that lie in proximity to, or within the Chesterfield Canal. This includes Shaw Lane/ Dunstan Farm to the north of Gringley on the Hill and the Grade II listed Gringley Shaw Lock. Walkeringham Brickworks Chimney would also lie in close proximity to the indicative route, and forms a non-designated landmark feature whose setting could be impacted by the proposed power line.

The Vazon Sliding Railway Bridge is within the potential crossing area on the Stainforth & Keadby Canal. Although not a heritage asset, it is an unusual piece of innovative engineering that will likely be of interest to the journey of the canal, and could contribute presently to local cultural heritage.

Water Environment (Chapter 10)

Works in proximity to our waterways have the potential to increase the risk of pollution to the River through the runoff of silt-laden deposits or the release of dust during construction. There is a significant risk of contamination through poor sediment management from exposed soils, with specific risks likely associated with excavation and piling works in proximity to our canals.

We understand that control measures will be incorporated as part of a Construction Environmental Management Plan, as opposed to being assessed within the Environmental Statement. In principle, the Trust has no objection to this approach, but requests that we are consulted upon the final details prior to their approval.

We understand that no direct discharge of water is proposed to our network. Should any discharge be proposed, then we request that this is detailed alongside any future application, and that the Environmental Statement assesses the impact of this on potential flood risk associated with our network. Please note that the Trust is not a land drainage authority, and our explicit consent would be required for any such works.

Traffic and Transport (Chapter 13)

Chapter 13 focusses on the potential impact of the project on highways. However, as the proposal would cross our network in two locations, **we request that the impact of the proposals upon navigable craft on our canals should be considered.**

Any closure of the canal to facilitate construction would need to be designed to ensure that impacts on boat traffic are appropriately managed.

The Stainforth & Keadby Canal is a freight waterway, which allows for the passage of both commercial and leisure craft. The Chesterfield Canal is used by leisure craft. Closure of either canal to facilitate construction would sever their connection to the River Trent, which could have a significant impact on users.

Boat users often plan routes several months in advance, and any unexpected closure could have significant economic impact upon our users, such as hire companies.

Consideration would be needed to ensure that any closures are planned to limit disruption to users. Any closures would need to be co-ordinated with the Trust and applied for via the Trust's Code of Practice, which stipulates specific winter stoppage dates and notice periods.

Impact on traffic can be minimised if works can be co-ordinated to only occur during night time hours. Should it be demonstrated that this is not possible, then to minimise disruption to craft, work would need to occur during the winter stoppage season, for which a long notice period is required to allow for boat users to plan ahead in advance for any closure.

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We wish to highlight that the Stainforth & Keadby Canal and the River Trent (which lies in proximity to High Marnham) are freight waterways capable of handling freight traffic. Opportunities may exist for the carriage of construction associated traffic to the site via waterborne craft, which could help reduce the need for carriage by road. This could help to reduce road miles and help improve the sustainability of the proposal, in line with the principles of section 2 of the National Planning Policy Framework. **We consider that options for alternative non-road based construction transport to and from the site, including use of the canal, should be considered in the Environmental Report.** We would be happy to provide further advice upon this, should the applicant wish to explore use of the canal for waterborne freight.

Socio-Economics, Recreation and Tourism (Chapter 16)

Impacts on the landscape and visual character of our waterway network, or impacts to boat movements could have impacts upon the attractiveness of our network in attracting visitors to the area, with potential economic consequences. We request that this is considered as part of the Environmental Statement.

The Scoping Document identified that temporary impacts on Public Rights of way during construction are to be considered. **We request that permanent impacts from changes to the visual character and attractiveness of these routes for users should also be considered to some degree. In addition, impacts on waterborne craft should also be considered.**

On the Chesterfield canal, the Wooden Beck visitor moorings lie within the red line boundary of the application area. Temporary or permanent closure of these during development could impact upon the local visitor economy. Should the cable cross over the moorings themselves, then it is unlikely that boaters will choose to moor below, which could significantly impact their value to the local economy.

Consultation with the Chesterfield Canal Trust

One of the Canal & River Trust's charitable objectives is to promote, facilitate, undertake and assist in for public benefit, the restoration and improvement of inland waterways.

In 1997 the Chesterfield Canal Trust were incorporated to promote the full restoration and appropriate development of the Chesterfield Canal. We therefore suggest that this organisation should also be included within any consultations on the proposals.

Other Comments

Our consent as Landowner and Navigation Authority may be required for the installation of new cable crossing below or above the Chesterfield and/or Stainforth & Keadby Canal.

Please note that the Cxanal & River Trust is a statutory undertaker which has specific duties to protect the waterways. Accordingly, it is likely that we will resist the use of compulsory powers which may affect our undertakings. Accordingly, we require that the acquisition of any rights over the River Ouse should be secured by agreement.

The proposals include works in close proximity to the Trust's waterways. In our capacity as landowner, we wish to advise that the applicant/landowner would likely be required to comply with the Trust's 'Code of Practice for Works affecting the Canal & River Trust'. The applicant/developer is advised to contact the Canal & River Trust's

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Works Engineering Team via switchboard on 0303 040 4040 should they have any questions or require further information upon the Code.

Yours Sincerely

[redacted]
Area Planner

[redacted]@canalrivertrust.org.uk

https://canalrivertrust.org.uk/specialist-teams/planning-and-design

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From:	clerk@crowleandealandcouncil.org
To:	North Humber to High Marnham
Subject:	Consultation Response - North Humber to High Marnham Planning Application
Date:	18 September 2023 10:19:50

Good morning,

Crowle & Ealand Town Council wish to submit the following comment in regards to the above mentioned planning application.

This council strongly objects to this application on the basis of disturbance to a SSSI location; the major disruptive and negative impact to natural environment and wildlife and being an area currently striving for outstanding natural beauty we feel this application would have detrimental consequences for this status.

Kind regards

[redacted]

[redacted]

Town Clerk
Crowle & Ealand Town Council
The Chapels, Crowle Cemetery
Mill Road, Crowle, North Lincs, DN17 4LN
01724 710020
Working Hours:

[redacted]

From: Clerk Dunham Parish Council
To: North Humber to High Marnham



fairness most of these will impact on our local roads but put together with now National Grid landscape changes, our area feels under the cosh!!

Solutions

Your website informs us that building new high voltage power lines and pylons comes at a significant cost and impact on the environment.

** Your new major research project developing electrically-resistant cross arms is what we would like. It can be retrofitted onto existing pylons as a way of upgrading the voltage and doubling the power in the transmission line.*

We are told that the benefits are:

-conductors can operate at highway temperatures and higher voltages, effectively doubling the power in the transmission line

- reduced outages due to conductor swing in high winds

- up to 30% reduction in tower size and footprint for new transmission lines

Let's talk more about these options.

** At no point in the consultation process was there talk of running the cables under the river Trent. There would be no payments to farmers, there would be no negative impact on the landscape, there would no negative impact for residents: if a solar farm can lay a cable from Morocco to Cornwall, putting an electricity cable down the Trent should be a walk in the park.*

It is clear that as a private entity you need to deliver this development at the lowest cost: you have to be mindful of shareholder values and reduce costs to consumers. But it is grossly unfair that a relatively small amount of customers I.e. ourselves, will have to bear a loss of amenity for the benefit of every body else.

We want a less visually intrusive solution, at a cost shared by all customers. An extra cost of £3 billion is cited in the consultation document and is a significant amount of money, but shared amongst millions of consumers, it would write off the initial cost gradually over several decades and would not in the end amount to a sizeable increase in peoples' bills.

We acknowledge the need, we all want improved green electricity, we know we all need to be flexible but….. your approach is ' they already have pylons, so what's a few more'.

Our voice is not as loud as a towns, we don't have the numbers of population to shout out our displeasure, but in the end it's all about individuals, whether we live in a pocket of hundreds or thousands, no one wants more pylons scarring their landscape.

Kind Regards,

Dunham-on-Trent with Ragnall, Darlton and Fledborough Parish Council

Privacy Notice

Ellerker Parish Council

C/O 16 Chantreys Drive
Elloughton
Brough
East Riding of Yorkshire
HU15 1LH
8th September 2023

National Grid Electricity Transmission – North Humber to High Marnham – Stage One Consultation

- Section 2 – Skidby to A63 Dual carriageway
- Section 3 - A63 dual carriageway to River Ouse Crossing.

Dear Sir / Madam

I write to confirm the concerns of the residents of Ellerker with regards to the above proposal and request your support. Many residents attended consultation events at South Cave on the 23rd June and Gilberdyke on the 29th June. Ellerker Parish Council facilitated a public meeting attended by over 100 concerned residents of Ellerker and surrounding villages on the 6th July.

The view of the meeting was that it is appreciated that the additional capacity is required, but National Grid should lay the lines underground. This is not a case of NIMBYism, as residents understand clearly the need for additional infrastructure to support clean energy targets for the future. Rather they are voicing the concern that under-grounding is not being offered as an option because of the significant additional costs associated with routing them in this way.

The residents have over the years, invested their time and money to ensure that this attractive and unspoiled village is protected from undue and unsuitable development. There is a conservation area order in place and a neighbourhood plan is well under way. Our village will be severely affected by the proposals of this project. If these proposals are accepted by the government Ellerker will be surrounded by pylons and cables.

Residents are concerned that National Grid have made an application to the government for a National Policy Statement which, in effect would mandate the planning inspectorate to give a green light to the proposals. The grant of such a statement would prevent dissent and is a breach of the democratic process. National Grid are seeking to condense what should be a seven-year process to three and a half years. This seems like undue haste for a process which will cause significant harm to the surrounding countryside, its wildlife and population.

Many European Countries have preserved the beauty and integrity of their countryside by the use of underground cables. Such an option should be available for Ellerker and the surrounding villages regardless of any increased costs. It is noted that National Grid have hinted at cheaper electricity if their proposals are accepted but our prime concern is the preservation of our village and the wider East Riding of Yorkshire. Other parts of the UK have

underground electricity cables and although this is not widespread it should be an option for communities having infrastructure imposed on them.

The routing of the existing pylons from Woodale and past Ellerker caused great and long-lasting animosity within the small community, pitching residents against each other. Asking residents to choose the route for overhead cables has the potential to divide this small community once again.

A cross over of the lines could take place at the top of Woodale if the preferred route was to the South of Ellerker where the pylons could run in close proximity to the others. This would limit visual impact, avoid Ellerker village and also not damage the land alongside the footpath and up to Mount Airy. It also limits the need for a crossover near the A63.

In Woodale there seems to be a desire to use the land up to Mount Airy which would adversely affect the land, Wolds Way and views for miles. It also locks the properties at Woodale in between two pylon runs. The option of parallel pathing with the existing line needs to be the only way of using overhead - but as above underground should be the strong preference despite National Grid's protestations and the fact that the area is not strictly an Area of Natural Beauty. No settlement should be surrounded by overhead lines and pylons.

Overhead lines are not fit and forget, requiring access by land and air, painting, and create significant noise and possible health risks.

There will be a visual amenity impact on the Conservation Area if the lines are overhead. The importance of the landscape, natural habitat, property prices, views and footpath of the Wolds Way National Trail should be preserved along with the mature woodlands.

Further information and reassurances are required with regards to electricity force fields particularly at the Cross Over point and the potential impact on health.

Concern expressed that the lines could become an ecological trap, particularly with regards to migrating birds. The Humber is part of the UNESCO East Atlantic highway. We are the pathway that thousands of birds' cross. World Heritage are in the process of making the Humber a World Heritage Protected site. More pylons would obstruct their route and the thicker new lines that are proposed.

Even now with increased traffic as we have had recently due to National Grid assessing the pylons, it has been an issue as there are limited passing places. This route is also heavily used by groups of cyclists, walkers, runners, and for sheep being moved to various fields as well as villagers. There are various weak areas with road bridges. The roads have areas of concern which are not on the council's priority list to repair.

In the National Grid report they acknowledge the sensitivity of the area and state that avoiding impact will be 'difficult'. Extra pylons will add additional danger to pilots using Mount Airey airfield as well as the many microlight pilots who fly in the area.

Ellerker Parish Council

Whilst we accept the government's desire to achieve its targets for 2034, we think they need to realise that this may be too ambiguous. Our village must not be sacrificed on the altar of Net Zero.

It appears that National Grid are seeking the Policy Statement to avoid litigation or judicial review. This is unacceptable in relation to a major project like the one proposed. No one should face being surrounded by pylons with no right to object.

Yours sincerely,

[redacted]

[redacted]
Clerk / Responsible Officer
Ellerker Parish Council

The Planning Inspectorate
The Square,
Temple Quay House,
Temple Quay
Bristol BS16PN

[Via Email:
NorthHumbertoHighMarnham@planninginspectorate.gov.uk]

Our ref: XA/2023/100025/01-L01
Your ref: CGNC-NG-CNS-REP-0002

Date: 18 September 2023

Dear [redacted]

EIA SCOPING OPINION CONSULTATION: THE NORTH HUMBER TO HIGH MARNHAM NATIONAL GRID UPGRADE.

Thank you for consulting us on the EIA Scoping Opinion for the above project. We have reviewed the Scoping Report, referenced CGNC-NG-CNS-REP-0002 and dated August 2023, and have the following advice:

We broadly agree with the topics to be scoped in and out of further assessment within the Environmental Statement (ES). We have provided our advice on the topics within our remit below. These are in the order prescribed by the Scoping Report for ease of reference.

Ecology and Biodiversity

The Environment Agency agree with the topics scoped in within this section of the report and welcome the use of appropriate legislation listed.

Table 8.2: Relevant Local Planning Policies, Policy ENV5: Strengthening Green Infrastructure from the East riding Local Plan 2012-2029 Strategy Document (reference 2.7) states: *'Development proposals should:*

- *Incorporate existing and/or new green infrastructure features within their design; and*
- *Capitalise on opportunities to enhance and/or create links between green infrastructure features such as those listed in Table 10. Links should be created both on-site and, where possible, with nearby green infrastructure features. B. Development proposals within, or in close proximity to, a green infrastructure corridor should enhance the functionality and connectivity of the corridor.'*

The Environment Agency are happy with the consideration taken by the applicant within

the report but would suggest the applicant consider each Local Authorities Local Nature Recovery Strategy where the scoping boundary crosses into these areas.

The mitigation measures noted within the report are satisfactory, the applicant should note that where watercourse crossings are proposed, seasonal restrictions may need to be considered, any works that may disrupt riverbanks and riverbeds may have an adverse effect on fish spawning depending on the season.

Table 8.9 Proposed scope of the assessment, states that *'Impacts to common and widespread habitats of low sensitivity and/or conservation interest'* is to be scoped out, we would like to see a list of habitats the applicant has classified as low sensitivity and/or conservation interest to prevent and loss in vulnerable habitats.

Biodiversity Net Gain

We also support the applicant's intention to provide Biodiversity Net Gain as part of the proposals. New developments should not only protect watercourses and their riparian corridors but also provide overall net gain for biodiversity. Net gain for biodiversity is defined as delivering more or better habitats for biodiversity and demonstrating this through use of the Defra Biodiversity Metric. It encourages development that delivers biodiversity improvements through habitat creation or enhancement after avoiding or mitigating harm.

This approach is supported by section 4.5 of National Policy Statement EN-1 and also paragraphs 174 and 179 of the National Planning Policy Framework (NPPF).

The enhancement of biodiversity in and around development should be led by a local understanding of ecological networks, and should seek to include:

- habitat restoration, re-creation and expansion.
- improved links between existing sites.
- buffering of existing important sites.
- new biodiversity features within development; and
- securing management for long term enhancement

The Environment Act 2021 looks to ensure that the overall impact from development on the environment is positive. The Act includes measures to strengthen local government powers in relation to net gain and a minimum requirement of 10% biodiversity net gain. Although we recognise that provision of BNG is not yet mandatory for Nationally Significant Infrastructure Project, we encourage the applicant to consider an approach to development that results in measurable net gains in biodiversity, having taken positive and negative impacts into account.

The Planning Practice Guidance (PPG) provides guidance on the application of net gain and Institute of Ecology and Environmental Management, together with CIRIA and the Institute of Environmental Management and Assessment have published guidance on how to deliver net gain in practice. These can be downloaded here.

Water Environment – Flood Risk

Large parts of the proposed development is situated within Flood Zones 2 & 3 with some parts being located within Flood Zone 3b, it is essential that the Sequential Test and Exemption Test is required to ensure reduction in risk is mitigated as much as possible.

Cont/d..

In accordance with National Planning Policy Framework (NPPF) and the sequential test (paragraph 161), *'development should apply a sequential, risk-based approach to the location of development, taking into account all sources of flood risk and the current and future impact of climate change, to avoid (where possible) flood risk to people and property'*. The development should take a sequential approach where it can, if there are any opportunities for development to be located outside of Flood Zones 2 and 3 and into Flood Zone 1, this should be prioritised. If there is any above ground construction that is in an undefended area, any increases in the footprint of the buildings will require floodplain compensation; the Flood Risk Assessment (FRA) needs to consider floodplain compensation on a level-for-level, volume-for-volume basis. With regards to floodplain compensation, The Environment Agency would usually consider the 1-in-100-year plus 30% climate change flood height as the (fluvial) 'design flood'. The FRA also needs to ensure that there is no increase in flood risk to third parties because of this development, for example by altering flood flow routes.

The report discusses the use of temporary and permanent culverts. If these are in relation to culverting of main rivers, The Environment Agency's policy on culverts states *"We are opposed to the culverting of any watercourse because of the adverse ecological, flood risk, geomorphological, human safety, and aesthetic impact… The applicant will be expected to demonstrate why culverting is both necessary and the only reasonable and practicable alternative. Alternatives could include open span bridges, revisions to site layout or diversion of the watercourse."*

Paragraph 2.3.19 of the Scoping Report references paragraph 154 of the NPPF in acknowledgement that development should be planned in a way to avoid increased vulnerability to the range of impacts arising from climate change. Although we are pleased that this has been acknowledged, given the flood risk associated with certain areas within the scoping boundary, we would expect the Scoping Report to also make note of the NPPF policies specifically relating to development and flood risk (paragraphs 159-169)

Chapter 4 discusses the Limits of Deviation (LoD), with paragraph 4.2.42 referring to LoD to allow for necessary and proportionate flexibility in terms of underground cables and trenchless crossings. Such activities could also have an adverse impact on flood risk and any flood defence assets, so we recommend that flood risk be taken into consideration when setting the LoD.

Paragraph 10.4.1 lists the flood risk data sources used to inform the scoping report. In addition to the sources listed, we strongly recommend that the local Strategic Flood Risk Assessments be used in better understanding current and future flood risk.

In accordance with The Planning Practice Guidance (PPG) and the Flood risk vulnerability classification, this development would be considered 'essential infrastructure'. Further guidance can be found via the following link Flood risk assessments: climate change allowances - GOV.UK (www.gov.uk). For developments that fall under this classification and that are located within the Lower Trent and Erewash Management Catchment, it is required that they assess the risk of flooding using a 39% climate change allowance for fluvial flood risk. This is known as the Higher Central allowance. For tidal flood risk, this should be assessed using the 1-in-200-year event and the Upper End allowance. For developments that fall under this classification and that are located within the Don and Rother Catchment, it is required that they assess the risk of flooding using the Higher Central allowance for fluvial flood risk. For tidal flood risk, this should be assessed using the 1-in-200-year event and the Upper End allowance.

Cont/d..

Paragraph 10.7.9 discusses the limits of the scoping assessment undertaken. However, we have concerns over the assumptions that have been made in terms of the scoping assessment of flood risk (section 10.7.9):

- *'It is assumed there is sufficient data from the Environment Agency, LLFA and IDBs to inform a site-specific FRA and that no new flood risk models will need to be developed.'* The agencies listed can provide the best available data, but these are often larger catchment-scale models, which may not be appropriate for a more thorough site-specific assessment. Furthermore, 'best available data' does not necessarily mean the data is fit for its intended use. A thorough assessment of the suitability of any flood models should be undertaken prior to deciding whether any new or updated modelling is necessary to undertake a site-specific flood risk assessment.
- *'It is assumed there is sufficient data from the EA to define the current condition and standards of protection provided by existing flood defences, and that no baseline condition surveys will be required.'* It is up to the applicant to demonstrate that any data obtained is suitable for use. Some assets may be third-party owned so the Environment Agency may not have the necessary data on the condition and standard of protection provided. It is also up to the applicant to determine whether a more recent condition survey is required based on what data is currently available.

When discussing flood risk, most of the key areas we expect to be discussed are acknowledged within the report, showing recognition of the potential flood risk implications of the scheme. Based on the information provided within the EIA Scoping Report, we consider there to be ample justification for the flood risk themes (proximity to main rivers and flood defence assets; fluvial flood risk; tidal flood risk; flood flow routes; and future flood risk and climate change) to be scoped into the ES. However, the applicant has decided to scope all of these topics out of the assessment without sufficient justification.

Regarding flood risk, parts of the site are located within the Isle of Axholme flood risk area. This is an area of land (the historic flood plain of the River Trent) which has been artificially drained, with water levels managed by a network of pumping stations. The Isle of Axholme has a critical flood level of 3.8 metres Above Ordinance Datum (AOD), this is an estimated flood level following a prolonged breakdown of the pumping station network and high-water levels on the River Trent. Further details relating to the critical flood levels and appropriate finished floor levels for development can be found within the North and Northeast Lincolnshire Strategic Flood Risk Assessment (November 2021) Strategic Flood Risk Assessment | NELC (nelincs.gov.uk)

Proximity to main rivers and any flood defences assets would be expected to be scoped in, but the applicant has not considered this in the EIA Scoping Report. This is currently not considered as part of the scoping report but is an important consideration in terms of current and future flood risk and ensuring that flood risk is not increased elsewhere. Without early consideration of any interaction between the scheme and main rivers/flood defence assets there may be a risk to the structural integrity of any flood defences assets, engineered or natural, essential in ensuring that flood risk is not increased elsewhere. Generally, we seek for any works to take place more than 8m from a fluvial main river or flood defence (taking into consideration any possible underground structures/buried elements associated with a defence), or 16m from a tidal main river or flood defence (taking into consideration any possible buried elements associated with a defence). As the Scoping Report does not refer to any minimum setback, we have to assume that activities will be taking place in close proximity to main

rivers and flood defences and so expect this to be scoped into the assessment to ensure consideration of suitable mitigation.

Paragraph 10.4.10 of the report acknowledges that large parts of the northern and central sections of the study area are at high risk of flooding, with the Project Scoping Boundary crossing large extents of fluvial and coastal floodplain. Despite this acknowledgement, there is no justification as to why fluvial flood risk has been scoped out of the assessment and we would strongly urge it to be scoped in.

Referring to Paragraph 10.4.10, as above, there is no justification as to why tidal flood risk has been scoped out of the assessment and we would strongly urge it to be scoped in to ensure the risk of tidal flooding is addressed.

Section 4.2 references certain structures, such as above ground kiosks, pylons, compounds, and gantries, which have the potential to obstruct flood flow routes and reduce flood storage capacity if not appropriately located or designed. Therefore, we would like to see flood flow routes scoped into the ES to ensure that any impacts on flow routes are given the necessary consideration.

Paragraph 10.6.6 states that with an open cut (trenched) watercourse crossing there would be a 'temporary physical disturbance and temporary changes to watercourse flow regimes.' It also states that 'impacts would range in duration, but access crossings may be in place in some locations for several months.' Despite recognising the potential negative impact on flood flow routes, the Scoping Report has not justified why this has not been scoped into the assessment. Similarly, paragraph 10.6.8 acknowledges that some sites located in the floodplain could see localised flood impacts associated with the storage of spoil reducing available floodplain storage or interrupting key floodplain flow paths. It is not acceptable for any proposal to result in an increase in flood risk elsewhere, so appropriate mitigation needs to be included. There is no justification as to why flood flow routes have been scoped out of the assessment and we would strongly recommend it be included given the need for appropriate flood risk mitigation against the risks identified within the Scoping Report.

Paragraph 4.6.1 states that the design life of the Project is to be at least 80 years, but that with regular maintenance it could be extended further. Therefore, as a minimum, the scheme should be considering the potential flood risk implications of the scheme for the next 80 years. Given that there are already areas within the scoping boundary at high risk of flooding from tidal / fluvial sources, this risk is expected to increase in the future with climate change, which is why we consider it essential that future flood risk and climate change is scoped into the ES.

We support the production of a Flood Risk Assessment & Water Framework Directive (WFD) Screening Assessment to inform the EIA process. We recommend that the Flood Risk Assessment should consider methods that have multiple benefits such as Natural Flood Management and SUDS where flood water management is required. The WFD Screening Assessment should include opportunities to enhance the watercourses effected as this would provide mitigation, WFD improvements and potential for Biodiversity Net Gain, particularly where watercourses have been degraded by land drainage activities.

Section 10.4.13 states *'Many of the watercourses in the study area have been subject to modifications for the purposes of land drainage and flood defence and have hydromorphological designations as 'Heavily Modified' waterbodies (HMWB). The*

ordinary watercourses in the study area, particularly those within IDB districts, also serve a land drainage function and have a relatively low hydromorphological diversity.' Where the development is proposed in an Internal Drainage Board managed area the ES should also consider the long-term future of the proposal in terms of climate change. Much of this land is only 3m above sea level and rising sea level effected by climate change should be considered as part of the design process.

Geology and Hydrogeology

Due to the very large scale of the proposed scheme the site is underlain by several geological formations. The following bedrock formations located beneath the proposed development are classified as Principal Aquifers - Burnham Chalk Formation, Welton Chalk Formation, Ferriby Chalk Formation, Hunstanton Formation, Brantingham Member, Upper Lincolnshire Limestone Member, Lower Lincolnshire Limestone Member.

Secondary A aquifers associated with the Kellaways Sand Member, Thorncroft Sand Member, Frodingham Ironstone are present beneath the development site. A large proportion of the site is underlain by the Mercia Mudstone and Scunthorpe Mudstone Formation, both of which are classified as Secondary B Aquifers. Other bedrock formations include the Clarborough Member, Charmouth Mudstone Formation, Penarth Group, (Secondary Undifferentiated) and the Ancholme Group and Whitby Mudstone Formation (Unproductive Strata).

Various superficial deposits overlie the bedrock, although in some locations the superficial deposits are absent. The superficial deposits include the Bielby Sand Member, Alluvium, Warp, Blown Sand, Sutton Sand Formation, Glaciofluvial deposits, Holme Pierrepont Sand and Gravel member which are all classified as Secondary A aquifers. Till and Head deposits are also present and these are classified as Secondary (undifferentiated) aquifers. The Hemingbrough Glaciolacustrine Formation and Peat superficials are classified as Unproductive Strata.

Part of the study area is within a Source Protection Zone (SPZ). These are associated with abstractions to the north of Cottingham. The study area crosses the shared SPZs (1, 2 & 3) for a collection of abstractions from the Chalk Principal Aquifer. Development in this area will have to be carefully managed to prevent pollution of this vulnerable groundwater.

The construction and operation of the proposed development may require a number of environmental permits and early discussions with the Environment Agency about this is important.

Having the appropriate pollution prevention measures in place to protect the water environment during the construction and operational phases is also an important factor that must be considered.

Dewatering for the trenchless crossings must in the assessment of risks to groundwater also include an assessment of whether the activity could induce saline intrusion as the Chalk is susceptible to this process in this area.
The remaining activities that have the potential to cause risk to groundwater will be included in the CEMP. These include,

- Construction methods such as appropriate piling techniques (if required) to minimise the risk of mixing of aquifer bodies through the creation of new pathways. This includes the provision of a risk assessment, which would be undertaken once the proposed foundation solutions are known, in accordance with EA guidance 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination'.
- Where new or additional surfacing is required on any access tracks and compound areas, these will be permeable surfaces where ground conditions allow. The project will incorporate appropriate surface water drainage measures into its final design for the any access tracks so that they do not lead to a significant increase in flood risk. Temporary haul routes within Flood Zone 3 and areas of high and medium risk of flooding from surface water will be removed at the end of the construction phase and the ground surface will be reinstated to pre-project levels.
- All use and storage of chemicals and fuels are to be undertaken in accordance with EA guidance and the Control of Pollution (Oil Storage) Regulations and also be controlled and monitored under the Construction and Environmental Management Plan (CEMP);
- The control of earthworks or materials movement (including any re-use of materials) under appropriate Environmental Permits, exemptions or CL:AIRE The definition of Waste: The Development Industry Code of Practice (2011);
- Any temporary dewatering activities during construction will be undertaken in accordance with appropriate EA guidance (including appropriate assessment undertaken as required by the guidance), and if required, an Abstraction License and Environmental Permit (for the discharge);
- A protocol for dealing with any unexpected contamination will be included within the CEMP.

The proposed methodology for assessing risks to groundwater receptors within the CEMP is largely acceptable although we have the following comments to make.

- The applicant should ensure that all groundwater abstractions are included in the assessment, i.e. licensed and private supplies.
- Regarding the surface water drainage, pollution prevention measures should be incorporated. This is particularly important in the areas that pass through the source protection zones.
- Parts of the development boundary overlie the Chalk which is classified as a Principal Aquifer. Pollution prevention in these areas will be crucial, especially during the construction phase, to prevent issues with sediment fines. Some of the abstractions in this area are from adits, rather than boreholes, which are particularly vulnerable to pollution.

Paragraph 4.3.47 details how horizontal directional drilling will be carried out if required. This activity has the potential to cause pollution if not completed in a controlled manner. This activity does not appear to be mentioned in the proposed CEMP. If horizontal directional drilling (HDD) is used for the installation of cables this work could involve the use of drilling muds and their use may require risk assessment to ensure they do not pose a risk to controlled waters. It is possible that a permit for their use may be required unless an exemption applies. Early discussion with the Environment Agency about the permitting requirements is therefore important. The potential to use HDD techniques should therefore be included in the CEMP if it is likely to be an option. This is particularly important if it will be used within a source protection zone.

Cont/d..

Paragraph 11.5.4 states that *"Where specific sites have been identified in the study area with a moderate (or above) risk to sensitive receptors from potential contamination – these sites will initially be reviewed against the Order Limits. Where the Order Limits and proposed construction activities do not interact with these sites, no further assessment will be required. However, where there is potential for any interaction of the Order Limits or proposed construction activities with these sites, each site will be individually investigated and assessed (in accordance with guidance described in 11.2.7) to determine any mitigation measures or remediation requirements required. The nature and scope of any mitigation or remediation will be agreed with the EA and LA (as appropriate)."*
Whilst we are largely satisfied with this approach, we are likely to suggest that a requirement is included within the DCO for land contamination to be investigated as and when required. The report states that the land contamination risk assessments will be prepared in line with our Land Contamination Risk Management guidance Land contamination risk management (LCRM) - GOV.UK (www.gov.uk).
We are satisfied with the proposed way forward and assessment methodology, provided the above comments and recommendations are incorporated.

Permitted landfill

There is an active inert landfill, Little Weighton Cutting Landfill (reference EA/EPR/DB3708CC) within the study area. This is mentioned in Appendix 11.A. As the site is active, with monitoring taking place from groundwater boreholes, these monitoring boreholes should not be disturbed during the works. Discussion with the operator of this permitted site is likely to be required to ensure any interactions with the landfill does not affect their monitoring or operation.

Air Quality

Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/ or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority.

This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NOx), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM10 and PM2.5). Use of low emission technology will improve or maintain air quality and support LPAs and developers in improving and maintaining local air quality standards and support their net zero objectives.

We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority.

The requirement to include this may already be required by a policy in the local plan or

strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit.

Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application to which this then can be applied.

Noise and Vibration

Vibration from the installation of structures may adversely affect flood defences from vibration. By way of example, Section 4.2 discusses the installation of pylons and other above ground structures. Given there is no indication of where such structures will be installed in relation to main rivers or flood defences, we would like to see vibration monitoring scoped into the assessment to ensure that the associated vibrations will not adversely affect any flood defence structures. Vibration should be limited to a safe threshold using appropriate guidance. For example, the type of pylon foundation chosen (e.g., pad and column, mini pile or tube pile) and associated methodology should be assessed. Depending on proximity an assessment may also be required for vibration from HGV traffic/plant.

Climate Change

Whatever final design or location is chosen the likely life span of the site will mean that it will need to operate within a changing climate. Therefore, a robust design and sensitive final location selection to accommodate future climate change impacts should be pursued. This will need to consider issues such as flood risk, increased heat, and drought, all of which could impact on the efficient running of the site. Climate change impact risk assessment and adaptation measures should include the potential impact of a changing climate for the expected duration of site operations.

Waste Management

Waste on site

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste.
The applicant should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

- The Environment Agency recommends that the applicant should refer to our: Position statement on the Definition of Waste: Development Industry Code of Practice and;
- website at https://www.gov.uk/government/organisations/environment-agency for further guidance

Waste to be taken off site

Cont/d..

Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2010
- The Waste (England and Wales) Regulations 2011

The applicant should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period the developer will need to register with us as a hazardous waste producer. Refer to our website at www.gov.uk/government/organisations/environment-agency for more information.

Environment Agency Land

There are some areas of land, specifically around main rivers, which are land owned by the Environment Agency. Due to the large scoping area, it is unclear at this stage whether this land will be affected by the proposals, but we would welcome ongoing discussions with the applicant about this.

Environmental Permitting Regulations

Flood Risk Activity Permit

There are a number of main rivers withing the scoping boundary. The Environmental Permitting (England and Wales) Regulations (EPR) 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence • involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit Flood risk activities: environmental permits - GOV.UK (www.gov.uk) or contact our National Customer Contact Centre on 03708 506 506. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Cont/d..

The scoping report does not discuss the specific measures proposed to cross the watercourses identified, but we welcome the production of a watercourse crossing survey and would welcome early discussions on this.

If any fencing is to be erected on the site, we would request fences are not within 8m of the flood defence or main river edge to allow inspections of the assets and watercourse to be unimpeded. A buffer zone of 8m from any watercourse or asset would be desirable. We would again, encourage early engagement should this not be achievable.

There is no mention at this stage regarding whether the applicant will seek to dis-apply the Environmental Permitting Regulations 2016. Whilst disapplication is common practice in DCO proceedings, we still require to be formally notified of this intention. If disapplication is formally notified to us, we still require discussions with the applicant around the proposals and will secure our interests by way of approval of plans through Protected Provisions. There is no guarantee that we will agree to dis-apply EPR.

Dewatering / Abstraction

If dewatering is required, it may require an environmental permit if it doesn't meet the exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works.

Temporary dewatering from excavations to surface water: RPS 261 - GOV.UK (www.gov.uk)

If they don't meet the exemption and require a full abstraction licence, they should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found here,

Abstraction licensing strategies (CAMS process) - GOV.UK (www.gov.uk)

Please note that the typical timescale to process a licence application is 9-12 months. The applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning.

The applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found here,
Discharges to surface water and groundwater: environmental permits - GOV.UK (www.gov.uk)

The use of drilling muds for the directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended.

Cont/d..

If the applicant is intending to seek to disapply any of the Environment Agency's legislation, they should contact us as early as possible. Further information on this can be found here, https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/an11-annexd/

We trust this advice is useful.

Yours sincerely

[redacted]
National Infrastructure Team - Planning Advisor

Direct dial: [redacted]
Direct e-mail: NITeam@environment-agency.gov.uk

End

From: [redacted]
To:
Cc:
Subject: HISTORIC ENGLAND ADVICE : EN020034 - North Humber to High Marnham - EIA Scoping Notification and Consultation our ref PL00793453
Date: 18 September 2023 20:22:30
Attachments: [redacted]

Dear [redacted],

HISTORIC ENGLAND ADVICE : EN020034 - North Humber to High Marnham - EIA Scoping Notification and Consultation our ref PL00793453

Thank you for consulting us on EIA scoping for this scheme (as attached). Historic England is the Government's advisor on the Historic Environment, I am leading on this case across both our Midlands and Yorkshire regions as the majority of the route lies south of the Ouse.

Thank you for consulting historic England on NGET's proposals for a new 400kV line North Humber to High Marnham with associated substation / connection works .

We welcome the iterative approach set out and the scoping in of heritage matters including both direct archaeological and setting effects, the advice and expertise of local authority archaeological curators and built environment specialist will be of great importance. It is likely that there will significant environmental effects in respect of the historic environment but with a robust and iterative approach to assessment and design refinement these can be minimised.

Methods

We welcome 9.7.10 – that professional judgement and consultation can be applied to refine the banding of asset importance 'asset value' in Table 9.6 on an individual basis.

In Table 9.7 the band for 'Large' impact sets the bar too high in terms of direct impacts upon significance – we suggest …'Changes such that the heritage value of the asset is totally altered or destroyed *or that heritage value central to its significance is lost*'.

Where an impact upon the significance of a designated heritage asset falls below the threshold for EIA reporting as a significant effect, but where it would still represent some harm to the significance of a designated asset this should be clearly signposted in the ES such that decision maker has before them sufficient information to apply NPS/NPPF requirements in respect of **all** harm to designated heritage assets.

Routeing and construction

Yorkshire Wolds

The Yorkshire Wolds was one of a group of four new protected areas proposed by Natural England in 2021

Isle of Axholme

The Isle of Axholme is identified in North Lincolnshire Council's existing and emerging local plan policies as an area of special landscape interest. This is further reflected in a desire by the authority to see the area afforded AONB designation. See Isle of Axholme HLC Miller Report Countryside Commission 1997 (in particular maps at pp196-197) Landscape Character Assessment & Guidelines 1999 Review of Isle of Axholme Historic Landscape Character JBSA Consulting 2021. It will be important to minimise impact on the historic landscape of open strip fields, early enclosure, settlements and wetland management and exploitation (all in Miller 1997). Route comments by section

Section 1: Creyke Beck - Skidby

The Scheduled Monument of Risby Jacobean gardens, hall and medieval settlement and Risby Hall Registered Park and Garden (Grade II) lie immediately to the north of the proposed corridor. In view of their rarity, great variety of form, and importance for understanding high status houses and their occupants, all surviving examples of an early date will be identified to be of national importance. The 17th century garden earthworks at Risby are well preserved and a fine example of Jacobean garden design. The designed landscape that forms the Registered Park dates to the late 18th century and was planned by Eaton Mainwaring Ellerker in 1760. The setting of both the scheduled monument and the park is agricultural fields. The open rural setting surrounding the gardens and registered park makes a positive contribution to their significance. The proposals have the potential to affect the setting of these heritage assets and the applicant should fully assess the contribution setting makes to the significance of these assets in order to fully understand any harm that may result from the proposals.

Section 2: Skidby - A63 dual carriageway

The proposals have the potential to affect the setting of GII* Church of St Peter in Rowley. The Church of St Peter dates from the 12th century, and the south aisle survives from that date amongst later 15th and 18th century additions. It is set within the ground of the GII listed Rowley Manor, in a parkland context with rural agricultural fields further afield. The open rural setting surrounding the church makes a positive contribution to their significance The GII* Church of All Saints at Brantingham should also be considered due to its prominent position below South Wold. The proposals have the potential to affect the setting of these heritage assets and the applicant should fully assess the contribution setting makes to the significance of these assets in order to fully understand any harm that may result from the proposals. Should undergrounding be required in this section due to other constraints, such as the designation of the Yorkshire Wolds AONB, then it will resolve any setting issues outlined above, although clearly further archaeological mitigation will be required.

Section 3: A63 dual carriageway - River Ouse crossing

The setting of GII listed buildings should be assessed by the applicant.

Section 4: River Ouse crossing

The Hall Garth moated site (NHLE 1013190), associated drainage channels and fishpond scheduled monument lies within the corridor at Ousefleet on the south bank of the river Humber. Hall Garth moated site is well preserved and is slightly unusual in having two enclosed islands. The monument should be avoided, and the route targeted in another part of the corridor if possible, subject to other constraints. If undergrounding was being considered in this section of the route, and it is appreciated this is unlikely, then this would not be viable in the vicinity of the scheduled monument. Setting of GII listed buildings should also be assessed by the applicant

Section 5: River Ouse crossing to Luddington

If the new line is to lie to the east of the existing pylons attention should also be paid to the setting of Ardingfleet Church of All Saints Grade I NHLE 1083144 and the associated scheduled Medieval Rectory NHLE 1016933 and Conservation Area etc. If the western path is selected through this section as preferred in the consultation text then the following comment will be of greater relevance as would the comment above in respect of Hall Garth moat. The spire of the Grade II listed Church of St Oswald Luddington is an important landscape features and pylon positioning in juxtaposition should be conserved closely in particular on the kinetic views along the track from the Halenby Park House GII crossing the B1392 and on approach to the church.

Section 6: Luddington to M180 motorway

The section passing Crowle, Belton and Epworth has considerable scope for impact upon the landscape where it potentially draws the existing visual impact of infrastructure around Keadby closer to these settlements in their strip field landscape context. Broadly, the more the new line can be pressed eastwards away from Crowle, Belton and Epworth the better both in terms of the setting of designated assets and conservation areas and the wider strip field landscape as set in relation to the historic settlements. Visual landscape impacts would be reduced by undergrounding although other archaeological considerations would also require consideration.

Section 7: M180 motorway to Graizelound

The section passing Crowle, Belton and Epworth has considerable scope for impact upon the landscape where it potentially draws the existing visual impact of infrastructure around Keadby closer to these settlements in their strip field landscape context. Broadly, the more the new line can be pressed eastwards away from Crowle, Belton and Epworth the better both in terms of the setting of designated assets and conservation areas and the wider strip field landscape as set in relation to the historic settlements. Visual landscape impacts would be reduced by undergrounding although other archaeological considerations would also require consideration. Views east for instance from the vicinity of the grade 1 Church of St Andrew Epworth NHLE 1068692 are of particular importance to the appreciation of the village in its strip field landscape context and underscore the importance of grouping the new overhead line as closely with the existing as possible (unless and underground solution can be pursued sustainably. The village of Beltoft with its grade I listed Hall and Blacksmiths Forge has the M180 to its north and the exiting overhead line immediately to its east, a new line immediately to the west would tend to a sense of visual enclosure. However, the significance of the former designed landscape north-east of Belton at Temple Belwood / Belwood House (bisected by the M180) but including the GII listed Belwood Obelisk NHLE 1083288 argues for keeping the route a far east as possible. We note that the proposed corridor runs on the west side of the existing passing between High Melwood and Low Melwood on the western side of the existing overhead line. The existing line passes close to Axholme Carthusian Priory Scheduled Monument NHLE 1017487, this monument is most sensitive in views eastwards hence it is important that the new line stays on the west of the existing. Likewise, the tighter in the new line can come on the western side of the existing overhead line the better as it passes between Haxey / East Lound to the west and Ownston Ferry to the east. Note the proximity of the existing line to the scheduled Kinaird motte and bailey castle NHLE 1017556 and associate Grade I listed Church of St Martin NHLE 1083261.

Section 8: Graizelound to Chesterfield Canal

We note the arc required to avoid Misterton (the setting of the Grade I listed CHURCH OF ALL SAINTS NHLE 1302717. Section 9: Chesterfield Canal to A620 As the path come back to the east it will be important to closely assess and consider in route planning views out from and to Beacon Hill Camp - Gringley on the Hill scheduled monument NHLE 1003241 versus impacts of passing closer to Beckingham. Initial consideration the topography bounding character of the A631 would tend to favour the more eastern route. Section 10: A620 to Fledborough The Grade I listed ruined Church of St Helen South Wheatley NHLE 1216694 in particular its tower is a prominent landmark conserved with HE grant aid and cared for by the Parochial Church Council at North Wheatley. It appears that the new line would pass close and we are concerned at potential impacts upon the monument's significance - detailed analysis will be required to find the best line and pylon positions. Avoidance of Sturton le Steple and setting impacts upon the GII* listed Church of St Peter and Paul is important. The A57

crossing passes east of Darlton and its Grade II* listed Church of St Giles 1212465 (currently closed and awaiting a scheme of reuse) the proposed line runs between the Church and the scheduled earthwork remains of Whimpton Moor Medieval Village NHLE 1017567. This is a delicate setting location and views across the church looking from its west (Darlton) side and from Whimpton Moor should be considered with refence both to the detail of the new overhead route and the location of pylons. The hamlet of Fledborough set in an intimate relationship to the Trnt is a site of both high archaeological interest and landscape importance. The setting of the Grade I listed CHURCH OF ST GREGORY NHLE 1045689 and the associated Grade II listed Manor House NHLE 1276572 requires close attendance in the planning both the overhead line and associated works. Note the undesignated but potentially nationally important medieval village remains at Woodcotes our ref HOB UID 322858.

Archaeological field work and detailed setting assessment

An iterative approach is required including targeted geophysical survey and trench evaluation as components of archaeological assessment, but other work necessary would be likely to include (but not be limited to) cartographic and historic sources , aerial photo and lidar evaluation, deposit modelling, Historic Environment Record (HER) and Portable Antiquities Scheme (PAS) data, targeted archaeological metal detector survey and detailed site specific setting work. Key to the success of an archaeological strategy in managing both archaeological and project delivery risks is that from the earliest stage opportunities for best and earliest understanding of the resource are pursued. There will never be a point where all unexpected discoveries can be avoided on schemes of this scale but through the targeting of areas of greatest archaeological and engineering complexity as early as possible and the timetable of intrusive investigations as early as can be achieved many problems can be avoided. In particular we find large schemes are vulnerable to timetable compression where insufficient time becomes available for late evaluation works to inform design or to adequately support sound and well costed schemes of mitigation due to the time required for initial results to be considered and reported.

Please address all future correspondence to:-
Midlands ePlanning e-midlands@HistoricEngland.org.uk cc Yorkshire ePlanning e-yorks@english-heritage.org.uk

Additional HE published advice etc

https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12/
https://historicengland.org.uk/images-books/publications/planning-archaeology-advice-note-17/
https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/
https://historicengland.org.uk/images-books/publications/eac-guidelines-for-use-of-geophysics-in-archaeology/
https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/
https://historicengland.org.uk/images-books/publications/ourportablepast/heag177-our-portable-past/
https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/

The East Midlands Research Framework https://researchframeworks.org/emherf/ and the Nottinghamshire Aggregates Resource Assessment, Trent and Peak Archaeology, Nottinghamshire County Council, 2013. (updated 2022) https://doi.org/10.5284/1018086 are also important reference points.

See also the Humber Wetlands Survey:-
https://archaeologydataservice.ac.uk/archsearch/record?titleId=1892857
https://unpathd.ads.ac.uk/resource/3287bc7bfa0536ef447faa0a6bfcb38b55733b93ba1ea6bcbfb77a2c0a68098a

Cambridge CUCAP AP's
https://www.cambridgeairphotos.com/
HE Aerial Archive
https://historicengland.org.uk/images-books/archive/collections/aerial-photos/
PAS Data

“The Scheme is very willing to give research access to researchers who register with us for higher-level access”. https://finds.org.uk/database

Yours sincerely

[redacted]

[redacted]
Team Leader (Development Advice)

Midlands Region
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Direct Line [redacted]
http://www.historicengland.org.uk/ | @HistoricEngland

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Sent by E-Mail to:
northhumbertohighmarnham@planninginspectorate.gov.uk

Your Ref: EN020034-000007

Date: 18 September 2023

Dear Sir/Madam

Proposal: Scoping Consultation under The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by National Grid Electricity Transmission (the Applicant) for an Order granting Development Consent for the North Humber to High Marnham project (the Development)

Location: North Humber to High Marnahm

Thank you for your letter dated 21 August 2023 consulting Lincolnshire County Council, as a neighbouring authority, on the Environmental Impact Assessment Scoping Report produced by National Grid dated August 2023.

The Council have reviewed the information and have the following comments to make.

Cumulative Impacts
The applicants approach to the assessment of cumulative effects in chapter 5 of the Scoping Report is welcomed.

In respect of the assessment of inter project effects, the Stage 1 assessment zone of influence (ZOI) should be sufficient in extent to capture relevant projects within the Lincolnshire geographical boundary. This assessment should include a review of planning

applications and the development plan in Lincolnshire and also include other projects that are currently proposed through the Development Consent Order (DCO) process.

Consideration should be given to the cumulative effects with other NSIP schemes such as Cottam, West Burton and Gate Burton solar schemes, which are currently at pre examination and examination stage.

In establishing the ZOI the applicant should be mindful of the geographical scale of some of the NSIP developments proposed and that a doubling of the maximum study area may not be sufficient to identify the full extent of the development or the potential cumulative impacts which could occur over a much wider geographical area.

Table 5.5 of the Scoping Report sets out the 'Largest study areas for environmental topics'. The Council notes that the study area for transport and traffic is set at ≤ 0.5 km, which would equate to a ZOI of 1 km. This distance is unlikely to be sufficient to identify any potential impacts within Lincolnshire.

The Council would expect the ES to contain a separate chapter on the assessment of cumulative effects covering both intra project and inter projects effects which in addition to setting out the approach and methodology clearly identifies other relevant projects and the potential for cumulative effects, any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources. It should also provide an assessment of the significance of the potential cumulative impacts identified, likely duration of the impacts (including phasing details) and mitigation measures.

Landscape and Visual

It is noted the both the landscape and visual study area extends into areas within the Lincolnshire boundary. Considering the proximity of the Lincolnshire boundary to the project scoping boundary (which in parts is less than 3km) there is potential for the development to indirectly impact on the wider landscape character and/or setting in Lincolnshire, particularly in respect of cumulative landscape impacts and impacts on visual amenity. The applicant is advised to consult with the County Council and West Lindsey District Council to ascertain whether there are any landscape areas, sensitive receptors or viewpoints from within the Lincolnshire boundary that should be included in the landscape and visual assessments.

Paragraphs 6.2.11 and 7.2.8 of the Scoping Report sets out the planning policy context. Lincolnshire County Council should be included as it also lies within 10 kms of the project.

Data Sources

The applicant is advised to review 'The Historic Landscape Characterisation Project for Lincolnshire' which should be included as a data source and can be found on the Council's website here:
https://www.lincolnshire.gov.uk/historic-environment/historic-landscape-characterisation

Heritage
Consideration should be given to using a study area greater than 1km, the Council is concerned that this distance may not be sufficient to identify heritage assets, their settings and important views that maybe impacted upon in Lincolnshire. There are a number of listed buildings, a scheduled monument and conservation areas located directly on or close to the Lincolnshire / Nottinghamshire boundary that could potentially be impacted upon by the development.

Data Sources
Considering the proximity of the Lincolnshire County boundary, the applicant is advised to review the Historic Environment Record (HER) held by Lincolnshire County Council and it should be included as a data source. Further information on the HER can be found on the Council's website here:
https://www.lincolnshire.gov.uk/historic-environment/historic-environment-record

Traffic and Transport
The Scoping Report in section 13.4 identifies key highway links of which a number route through Lincolnshire on predominantly single carriageway A-Roads. Consideration should therefore be given to traffic routing for construction traffic and how this is likely to impact on the Lincolnshire road network, amenity and the combined effects of construction traffic with other developments. The engagement with local authorities in respect of traffic and transport at paragraph 13.2.9 of the Scoping Report is noted. The Council would expect the Lincolnshire Highway Authority to be included in this consultation.

To date the applicant has had very little discussion with the County Council and it is expected that more dialogue will take place with the neighbouring authorities as the project proceeds through the pre-application stage.

Should you have any queries please do not hesitate to contact me.

Yours faithfully

[redacted]

for [redacted]
Head of Planning

[redacted]
Maritime and Coastguard Agency
Bay 2/24
Spring Place
105 Commercial Road
Southampton
SO15 1EG

www.gov.uk/mca

Your Ref: EN020034-000007

14th September 2023

Via email: northhumbertohighmarnham@planninginspectorate.gov.uk

Dear [redacted]

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by National Grid Electricity Transmission (the Applicant) for an Order granting Development Consent for the North Humber to High Marnham project (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for your letter dated 21 August 2023 inviting comments on the Scoping Report for the proposed North Humber to High Marnham project. The Scoping Report has been considered by representatives of UK Technical Services Navigation, and the Maritime and Coastguard Agency (MCA) would like to respond as follows:

The MCA has an interest in the works associated with the marine environment, and the potential impact on the safety of navigation, access to ports, harbours and marinas and any impact on our search and rescue obligations. The MCA would expect the impact of works in or over the marine environment to be subject to the appropriate consents under the Marine and Coastal Access Act 2009 before carrying out any marine licensable works.

We note that the project involves the creation of a transmission network between a new substation close to the existing Creyke Beck Substation, and a new substation close to the existing High Marham Substation in Nottinghamshire. This would be achieved by the installation of a new 400 kilovolt electricity transmission line over a distance of approximately 90 kilometres.

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The study area crosses the catchment of numerous watercourses within the Humber River Basin, including the River Ouse, River Thorne, the North and South Soak Drains, and the River Idle. These waterways have several attributes that could be affected by the project, including navigation and impact on other marine users. The MCA would expect the impact of the project on other users of the rivers and waterways to be considered as the project progresses.

It is our understanding that the location of the crossing over the River Ouse falls within the jurisdiction of ABP Humber as Statutory Harbour Authority (SHA). They are therefore responsible for maintaining the safety of navigation during the construction and the operational phase of the project. The overhead cable will also cross other waterways such as the Market Weighton Canal where The Environment Agency has responsibilities. The MCA would therefore expect the relevant navigation authority to be consulted as the project progress, with regards to overhead clearances and any works proposed in the watercourse. We would point the developers in the direction of the Port Marine Safety Code (PMSC) and its Guide to Good Practice. They will need to liaise and consult with the SHA and develop a robust Marine Safety Management System for the project under this code.

It is likely on this occasion that the impact on other marine users can be addressed through suitably worded conditions at the formal marine licence application stage.

We hope you find this useful at scoping stage.

Yours sincerely,

[redacted]

[redacted]
Maritime Licensing Project Lead
UK Technical Services Navigation

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From: NATS Safeguarding
To: North Humber to High Marnham
Subject: RE: EN020034 - North Humber to High Marnham - EIA Scoping Notification and Consultation [SG36050]
Date: 04 September 2023 10:31:28
Attachments: [redacted]

Our Ref: SG36050

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

Date: 18 September 2023
Our ref: 447246
Your ref: EN020034-000007

Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

BY EMAIL ONLY

Consultations
Hornbeam House
Crewe Business Park
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T 0300 060 900

Dear Sir/Madam

Environmental Impact Assessment Scoping consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: Order granting Development Consent for the North Humber to High Marnham project
Location: North Humber to High Marnham

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 21 August 2023, received on 21 August 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Natural England have been engaged by the applicant regarding this project via a Service Level Agreement. Natural England will continue to provide advice via this agreement throughout the development of the proposals.

For any further advice on this consultation please contact the case officer [redacted]@naturalengland.org.uk and copy to consultations@naturalengland.org.uk.

Yours faithfully

[redacted]
Planning & Environment Lead Adviser – East Midlands Area Delivery Team

Annex A – Natural England Advice on EIA Scoping

1- General Principles

Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided[1].
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES

Through our discussions with the applicant to date we are confident that the general principles are likely to be addressed within the Environmental Statement.

2- Cumulative and in-combination effects

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

a. existing completed projects
b. approved but uncompleted projects

[1] National Infrastructure Planning (planninginsepctorate.gov.uk) Insert 2 – information to be provided with a scoping request, Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements

c. ongoing activities
d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects

In particular, Natural England would like to refer to the high development pressure around the Humber Estuary. The impacts of this proposal in combination with other projects (NSIPS and TCPA projects) along the Humber must be considered within the ES. Especially, projects with the potential to impact functionally linked land should be considered.

3- Biodiversity and Geodiversity

The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.

Ecological Impact Assessment (EcIA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Public authorities who operate in England must consider what they can do to conserve and enhance biodiversity in England. This is the strengthened 'biodiversity duty' that the Environment Act 2021 introduces.

This means that, as a public authority, National Grid must:

1. Consider what they can do to conserve and enhance biodiversity.
2. Agree policies and specific objectives based on their consideration.
3. Act to deliver their policies and achieve their objectives.

4- International and European sites

The development site is within or may impact on the following **European/internationally designated nature conservation sites:**

- Humber Estuary SAC
- Humber Estuary SPA
- Humber Estuary Ramsar
- Thorne and Hatfield Moors SPA
- Thorne Moor SAC
- Hatfield Moor SAC

The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA. Natural England have provided advice directly to the applicant regarding the possible impact pathways for each of the above sites.

A summary of Natural England's advice relating to each site can be found in Table 1 Below.

Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.

Table 1: Potential risk to International designated sites

Site name with link to conservation objectives	**Potential impact pathways where further information/assessment is required.**
Humber Estuary SAC, Humber Estuary SPA & Humber Estuary Ramsar	*Key Point:* • *The cable route crosses the Humber Estuary. This introduces possible impacts via a number of pathways. Natural England consider this to be a key aspect of the development plans which must be addressed in detail to ensure avoidance, or mitigation, of any identified impacts.* Ornithological Interest (SPA & Ramsar) • Noise & Visual Disturbance to birds during construction, including at Functionally Linked Land (FLL) • Bird collision risk during operation • Visual Disturbance to birds during operation, including changes in lighting, perception as pylons as predator perch points • Long term loss or damage to supporting habitats, including functionally linked land Habitat Interest (SAC) • Air Quality impacts via construction traffic and dust mobilisation • Loss of habitats • Pollution events & Water quality changes • Changes to the hydrology of the estuary itself Species Interest (SAC) • Disturbance to River and Sea Lamprey and/or Grey Seal, i.e., via noise, vibration and pollution, including at functionally linked land. • Long term loss or damage to supporting habitats, including functionally linked land.
Thorne and Hatfield Moors SPA, Thorne	Ornithology Interest (SPA)

Moor SAC & Hatfield Moor SAC	• Disturbance at, or Loss or damage to, functionally Linked Land Habitat Interest (SACs) • Water quality impacts during construction

5- Nationally designated sites

Sites of Special Scientific Interest

The development site is within or may impact on the following **Site of Special Scientific Interest:**

- Humber Estuary SSSI
- Hatfield Moors SSSI
- Thorne, Crowle and Goole Moors SSSI
- Brantingham Dale SSSI
- River Idle Washlands SSSI
- Sutton and Lound Gravel Pits SSSI
- Treswell Wood SSSI
- Misson Training Area SSSI
- Misson Line Bank SSSI
- Chesterfield Canal SSSI
- Mother Drain, Misterton SSSI
- Ashtons Meadow SSSI
- Clarborough Tunnel SSSI
- Hewson's Field SSSI
- Rush Furlong SSSI
- Eastoft Meadow SSSI
- Haxey Grange Fen SSSI
- Crowle Borrow Pits SSSI

The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. Natural England have provided advice directly to the applicant regarding the possible impact pathways for each of the above SSSIs. A summary of Natural England's advice relating to each site can be found in Table 2 Below.

Table 2: Potential risks to nationally designated sites	
Site name with link to citation	**Potential impact pathways where further information /assessment is required**
Humber Estuary SSSI	See Humber Estuary SAC/SPA/Ramsar in table 1.
Hatfield Moors SSSI & Thorne, Crowle and Goole Moors SSSI	See Thorne and Hatfield Moors SPA and Thorne Moor and Hatfield Moor SAC in table 1.

Brantingham Dale SSSI	The cable route passes close to, or may pass over the top of, this SSSI. There are thus possible impacts from: • Habitat loss, where pylons are sited within the SSSI, or during construction where cables are raised above the SSSI. • Impacts may also occur as a result of air pollution from construction traffic or dust mobilisation.
River Idle Washlands SSSI & Sutton and Lound Gravel Pits SSSI	Despite the separation between these SSSI's and the cable route, due to the mobile nature fo the species for which the SSSI's are notified, consideration should be given to: • Noise and visual disturbance • Collision risk
Treswell Wood SSSI	This site lies adjacent to the cable route, giving rise to possible impacts from: • Direct disturbance to habitats during construction • Air pollution impacts from construction traffic or dust mobilisation. • Noise and visual disturbance to breeding birds associated with the SSSI. • Collision risk to breeding birds associated with the SSSI.
Misson Training Area SSSI & Misson Line Bank SSSI	These sites lie within proximity to the cable route at sections 8 and 9. Possible impacts include: • Air pollution impacts from construction traffic or dust mobilisation. • Noise and visual disturbance to breeding birds associated with the SSSI. • Collision risk to breeding birds associated with the SSSI.
Chesterfield Canal SSSI & Mother Drain, Misterton SSSI	Cable route section 8 passes over Chesterfield Canal, and passes adjacent to Mother Drain, Misterton. The notified interest of these SSSIs lies in their habitats and so possible impacts are limited to: • Habitat loss or damage during construction. • Pollution events and changes to water quality within the watercourses. • Air pollution impacts from construction traffic or dust mobilisation.
Crowle Borrow Pits SSSI	This SSSI lies adjacent to cable route section 6. Impacts pathways include: • Changes to site hydrology or water quality, due to open water features & wetland habitat interest. • Air pollution impacts from construction traffic or dust mobilisation.

Ashtons Meadow SSSI, Clarborough Tunnel SSSI, Hewson's Field SSSI, Rush Furlong SSSI, Eastoft Meadow SSSI & Haxey Grange Fen SSSI	These SSSIs are separated from the cable route, and are notified for their habitat interest. Possible impact pathways are limited to: • Air pollution impacts from construction traffic or dust mobilisation.

Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on SSSIs and their special interest features can be found at www.magic.gov .

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

6- Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 174 and 175). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

7- Protected Species

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

Applicants should check to see if a mitigation licence is required using NE guidance on licencing NE wildlife licences. Applicants can also make use of Natural England's charged service Pre Submission Screening Service for a review of a draft wildlife licence application. Natural England then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the

relevant Secretary of State in granting a DCO. Work relating to a LONI may be undertaken via the existing Service Level Agreement between the Applicant and Natural England. Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning contains details of the LONI process.

8- District Level Licensing for Great Crested Newts

The applicant has expressed an interest in entering into a District Level Licence agreement.

Where strategic approaches such as district level licensing (DLL) for great crested newts (GCN) are used, a letter of no impediment (LONI) will not be required. Instead, the developer will need to provide evidence to the Examining Authority (ExA) on how and where this approach has been used in relation to the proposal, which must include a counter-signed Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England, or a similar approval from an alternative DLL provider.

The DLL approach is underpinned by a strategic area assessment which includes the identification of risk zones, strategic opportunity area maps and a mechanism to ensure adequate compensation is provided regardless of the level of impact. In addition, Natural England (or an alternative DLL provider) will undertake an impact assessment, the outcome of which will be documented in the IACPC (or equivalent).

If no GCN surveys have been undertaken, Natural England's risk zone modelling may be relied upon. During the impact assessment, Natural England will inform the Applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN. The IACPC will also provide additional detail including information on the Proposed Development's impact on GCN and the appropriate compensation required.

By demonstrating that the DLL scheme for GCN will be used, consideration of GCN in the ES can be restricted to cross-referring to the Natural England (or alternative provider) IACPC as a justification as to why significant effects on GCN populations as a result of the Proposed Development would be avoided.

It should be noted that at present, there is only an active DLL scheme in the Yorkshire and North Lincolnshire areas of the project. No scheme is active in Nottinghamshire. A DLL scheme is planned to be launched within Nottinghamshire, however the exact timescales of this are currently unknown. Natural England would encourage engagement from the applicant regarding DLL as soon as possible, to ensure entry into the scheme is feasible for the full length of the project.

9- Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available here.

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

10- Ancient Woodland, ancient and veteran trees

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 180 of the NPPF sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists. Paragraph 2.9.19 of NPS EN-5 states that *'…applicants should: …protect as far as reasonably practicable areas of local amenity value, important existing habitats and landscape features including ancient woodland, historic hedgerows, surface and ground water sources and nature conservation areas.'*

Ancient Woodland has been identified within the scoping areas for the proposed development. We welcome the intention to avoid these areas as far as practicable as the route and Order Limits are defined. The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.

11- Biodiversity net gain

The Environment Act 2021 includes NSIPs in the requirement for BNG, with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. It is the intention that BNG should apply to all terrestrial NSIPs accepted for examination from November 2025. Natural England welcome National Grid's commitment to deliver 10% biodiversity Net Gain across all of their construction projects in advance of this date, including this project.

Biodiversity Net Gain outcomes can be achieved on-site, off-site or through a combination of both, however, on-site provision should be considered first. Natural England advise that the latest version of the biodiversity metric should be used to calculate the biodiversity impact of the development. It should be noted that the same version of the BNG metric should be used pre- and post-development to ensure consistency, as each version of the metric may give altered biodiversity unit scores as the calculator is updated.

Natural England recognises the high opportunity for the development to deliver BNG and it is

recommended that the following guidance is applied in order to achieve this:

- Biodiversity Net Gain: Good Practice Principals for Development
- BS 8683: 2021 Process for designing and implementing Biodiversity Net Gain

In addition, the applicant should be aware of forthcoming guidance and legislation in relation to the Environment Act 2021, which may be released in the interim prior to submission of the DCO application.

In order to maximise nature recovery and target habitat enhancement where it will have the greatest local benefit it is recommended that locally identified opportunities should be acknowledged and incorporated into the design of BNG (both on and off-site). This should include any locally mapped ecological networks and priority habitats identified by City of Doncaster Council. In addition, Local Nature Recovery Strategies (LNRS) are a new mandatory system of spatial strategies for nature established by the Environment Act 2021 which will contribute to the national Nature Recovery Network (NRN). Work is currently underway to develop these strategies, which will identify strategic priorities for nature protection, recovery, and enhancement. Given the size, scale and opportunities afforded by the application is therefore recommended that engagement with relevant local planning authorities, responsible authorities and statutory consultees (including Natural England) is undertaken to align habitat enhancement through the development with any emerging plans and policies in relation to LNRS.

12- Landscape

Nationally Designated Landscapes

In view of the distance of the current proposals from both the Howardian Hills AONB and the Lincolnshire Wolds AONB, it is considered that effects are unlikely. With regard to Natural England's future designation projects, we are currently considering the designation of the Yorkshire Wolds, in addition to three other projects. The final boundary of this new designation is yet to be confirmed. Natural England are fully resourced and committed to these four cases and is therefore not taking on any new designation projects at the current time.

The potential for impacts to the Yorkshire Wolds would need to be considered within the ES; Natural England will continue to engage with the applicant as both the designation and the development project progress.

Landscape and visual impacts

The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology

set out in *Guidelines for Landscape and Visual Impact Assessment 2013 (*(3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

The National Infrastructure Commission has also produced Design Principles Design Principles for National Infrastructure - NIC endorsed by Government in the National Infrastructure Strategy.

13- Connecting People with nature

The ES should consider the potential impacts on the Yorkshire Wolds Way National Trail. The proposed Overhead Line passes over this National Trail; thus, the impact of the construction and operation of the scheme should be considered. The applicant should have regard to NPPF Paragraph 100 which requires planning decisions to protect and enhance National Trails. The Yorkshire Wolds Way is represented by a partnership which includes the North York Moors National Park and East Riding Council. The National Trails website www.nationaltrail.co.uk provides further information.

The ES should consider potential impacts on access land, common land, public rights of way (including National Trails) and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 100. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

14- Soils and Agricultural Land Quality

Due to the scale of the project, there is potential for significant impacts to Soils and Best and Most Versatile Agricultural Land.

Soils are a valuable, finite natural resource and should also be considered for the

ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line paragraphs 5.168, 5.167 and 5.179 of the NPS for National Networks. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development. This includes during construction (i.e. siting of construction compounds and temporary access tracks) and operation (i.e. location of pylons, permanent access tracks and supporting infrastructure).
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This is likely to require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. This may be amended for linear areas to provide an accurate depiction of the land quality along the linear area. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed. This should include consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain, as well as sustainable soil management throughout all phases of the development. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction.

15- Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) [1]. A priority action in the England Biodiversity Strategy is to reduce air pollution

[1] Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK

impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NOx and SO_2 against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

There is potential for this development to cause adverse impacts to designated sites via dust and vehicle emissions during the construction phase of the development. We welcome Table 14.3 of the applicant's EIA scoping document, which indicates that both of these impact pathways will be assessed within the ES.

Ammonia emissions from road traffic could make a significant difference to nitrogen deposition close to roads. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road) – catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions – therefore consideration of the potential for impacts is needed (see https://www.agconsultants.co.uk/news/february-2020-(1)/ammonia-emissions-fromroads-for-assessing-impacts).

For the sections of the cable route which will involve construction traffic movements within 200m of the designated site the potential air quality impacts due to road traffic during the construction phase will need to be considered. When undertaking the assessment there will need to be clarification provided on which roads will be used to access the development site, and the number of predicted vehicle movements. Designated sites within 200m of a road which will experience a significant increase in traffic movements should be assessed for impacts due to air pollution from traffic. Natural England has produced guidance for public bodies to help assess the impacts of road traffic emissions to air quality capable of affecting European Sites. Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001

There are currently two models which can be used to calculate the ammonia concentration and contribution to total N deposition from road sources. One of these models is publicly available and called CREAM, and there is another produced by National Highways.

16- Climate Change

The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development will embed Nature Based Solutions, maintain ecological networks and build resilience to climate change. The ES should also incorporate the policies as set out in NPS EN-1 relating to climate change. The NPPF also requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 174), which should be demonstrated through the ES.

From: [redacted]
To: North Humber to High Marnham
Subject: EN020034-000007 - North Humber to High Marnham project
Date: 18 September 2023 11:44:56
Attachments: [redacted]

OFFICIAL

Network Rail Consultation Response

FAO:	The Planning Inspectorate
Date:	18/09/2023
Application reference:	EN020034-000007
Proposal:	North Humber to High Marnham project Scoping Opinion
Location:	North Humber to High Marnham project

Thank you for your recent correspondence relating to the above scoping consultation.

Network Rail is a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates, maintains and develops the main rail network. Network Rail aims to protect and enhance the railway infrastructure therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests, will need to be carefully considered.

Impact on Network Rail Infrastructure
With reference to the protection of the railway, the Environmental Statement should consider any impact of the scheme upon the railway infrastructure and upon operational railway safety. It should also include a Transport Assessment to identify any HGV traffic/haulage routes associated with the construction and operation of the site that may utilise railway assets such as bridges and level crossings during the construction and operation of the site.

In addition, should any part of the scheme require the use of, or access across railway land including the operational railway itself, the developer will be required to obtain the necessary agreements and consents (easement agreements, licences etc) from Network Rail going forward. We would strongly recommend that they engage with us early in the development of their scheme to ensure such matters are resolved well in advance.

Summary
Network Rail would be grateful if the comments above are considered by The Planning Inspectorate. Network Rail would welcome further discussion and negotiation with The Planning Inspectorate and National Grid in relation to the proposed development as required going forward. If you have any questions or require more information in relation to the above please let me know.

Kind regards

[redacted]
Network Rail Property (Eastern Region)
George Stephenson House, Toft Green, York, YO1 6JT

Growth and Regeneration Business Unit
Castle House
Great North Road
Newark
NG24 1BY

www.newark-sherwooddc.gov.uk

Telephone: 01636 650000
Email: planning@nsdc.info

15th September 2023

Your Ref: EN020034-000007
Our ref: 23/01486/NPA

[redacted], Senior EIA Advisor
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Sent Via Email to
northhumbertohighmarnum@planninginspectorate.gov.uk

Dear [redacted]

EIA Scoping Consultation – North Humber to High Marnham

Proposal:	Application by National Grid Electricity Transmission (the Applicant) for an Order granting Development Consent for the North Humber to High Marnham project
Site Address:	North Humber to High Marnham

Thank you for contacting Newark & Sherwood District Council (NSDC) in relation to the above.

We understand that the proposal consists of works to construct a new 400 kV overhead line (OHL) between the existing Creyke Beck substation in Yorkshire and a new substation close to the existing High Marnham substation, alterations to sections of existing OHLs and associated works.

We have reviewed the Environmental Impact Assessment Scoping Report and associated information made available on your website, including the information relating to the NSDC Local Authority area, and have no comments to make.

If you require any further assistance, please do not hesitate to contact me.

Yours sincerely

[redacted]

[redacted] - Business Manager – Planning Development

Consultation response – National Grid North Humber to High Marnham proposal

North & South Wheatley Parish Council wish to make the following comments as part of your consultation on proposals to upgrade / install an electricity network between North Humber and High Marnham.

You say that consultation plays an important part in developing your proposals and that our feedback can help to shape your plans as they evolve. As a first observation it would have been better perhaps if the first proposals had been drawn up in conjunction with local people who have more knowledge of the area – rather than using a map / office based approach to draft suggested routes.

The very strong preference, expressed here on behalf of the Parish Council which speaks for the residents of North & South Wheatley, is for the cabling to be underground or in the River Trent, due to the extremely negative impact on our landscape of more overground pylons.

Clearly cost is the driver for your plans for overhead lines, however they are without doubt unsightly and represent poor value to customers and those living within sight of them. We understand that the National Grid's own website suggests that pylons are being removed in some areas due to their visual intrusion, are routinely being installed underground now and that by 2030 no more will be installed overground. Knowing this it seems extremely unfair to the residents of parts of North Nottinghamshire, who already have had to accept large power stations and associated electricity pylons, to accept more pylons which will be there forever- just before the policy of overground cabling is abandoned– **easier and cheaper is not a good enough reason now**

In addition, with all the forecasts on how our weather will change, with more storms predicted for the future this is another excellent reason to put all new power lines underground. We refer you to this article which states cables should be under ground, (or hopefully in the River Trent) https://www.preventionweb.net/news/how-extreme-weather-threatens-bring.-down-uks-power-lines-and-halt-supply-homes

If it really is impossible to site the cables underground in this area or in the Trent (which we dispute on the basis that we have been presented with no evidence that it is in fact impossible) then we would suggest that the existing pylon infrastructure / siting is used – thereby minimising any disruption and objections. Failing that the pylons could be sited closer to Littleborough – removing the Parishes of Leverton, Sturton and Wheatley from the very negative effects of new pylons. Littleborough has circa 12 houses and so there would be fewer residents affected. I refer to the earlier comment about initial consultations with people who know the area, rather than drawing lines on a map with no 'on the ground' intelligence.

The current proposed site will be very close to a Historic Windmill at Leverton and St Helen's Church in Wheatley which is a historic building. Wheately is also in a conservation area. Whilst not having SSI status – which we understand would ultimately block any pylons – we feel that to prioritise wildlife and flora over the well being and amenity rights and safety of people cannot be justified.

We appreciate that we need to invest in clean electricity from new renewable sources, but not where it compromises the enhancement of our environment and negatively impacts on our local landscape.

As a final comment – we understand that the response to your written survey was poor. As a council we struggled to understand and complete it and are therefore unsurprised that residents either could not even start to fill it in or abandoned it half way through. If we were being very cynical we could suggest that it was designed to reduce negative (or any) comment.

With best regards

[redacted]

Clerk to Wheatley Parish Council

From: clerk@northleverton withhabblesthorpeparishcouncil.gov.uk
To: North Humber to High Marnham
Subject: RE: EN020034 - North Humber to High Marnham - EIA Scoping Notification and Consultation
Date: 14 September 2023 21:00:06
Attachments: [redacted]

Response to your email dated 21 August 2023.

North Leverton Parish considered this matter at their meeting held on Monday 4 September and asked me to provide their response as follows:

The Parish Council appreciate the need to invest in clean electricity from new renewable sources, but object where it negatively impacts on the local landscape and environment. The UK Government's 25 year plan for the environment, in particular the statements 'preserving our landscapes and places of beauty' and 'environment enhancement at its heart' should be taken into consideration.

The preference, for North Leverton with Habblesthorpe Parish Council would be for the installations to be underground, due to the extremely negative impact on the landscape particularly the unspoilt rural landscape of North Leverton with Habblesthorpe, which includes a historic working windmill. Overhead pylons would be unsightly to all those living within sight of the proposed corridor. Underground cables should be used to show that you prioritise natural beauty, wildlife, biodiversity, and visual impact over cost, this would be of benefit to everyone.

The Parish Council understand that in other areas of the country pylons have been removed due to their visual intrusion so the Parish Council ask that any infrastructure installed maintains the beauty of the landscape by being installed underground.

In addition, with all the forecasts on how our weather will change with more storms predicted for the future this is another reason to put all new power lines underground.
We refer you to this article which states cables should be under ground
https://www.preventionweb.net/news/how-extreme-weather-threatens-bring.-down-uks-power-lines-and-halt-supply-homes

Kind regards

[redacted]
Parish Clerk
North Leverton with Habblesthorpe Parish Council
Tel: [redacted]
I work flexibly, and you may receive emails from me outside of core hours. I do not expect you to read or respond to my email outside of your own hours of work.

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From: [redacted]
To: North Humber to High Marnham
Subject: EN020034-000007 Scoping Response NLC
Date: 18 September 2023 22:18:45
Attachments: Scoping Response Letter SCO.2023.4 NHtHM.pdf
SCO_2023_4 Heritage.pdf

Good evening,

Thank you for giving North Lincolnshire Council the opportunity to comment on the submitted Scoping Report in respect of the North Humber to High Marnham project. Please find attached a copy of the councils scoping response as well as a copy of the detailed advice provided by the councils Historic Environment Officer, which is summarised in the response.

Do not hesitate to contact me should you wish to discuss this matter further.

Kind Regards

[redacted]
Development Management Specialist | Development Management | Economy and Environment

@ [redacted]
☎ [redacted]
✉ North Lincolnshire Council, Church Square House, 30 – 40 High Street, Scunthorpe, DN15 6NL

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PLACE PLANNING & HOUSING - HISTORIC ENVIRONMENT RECORD

MEMO

North Lincolnshire Council

TO:	[redacted] **DEVELOPMENT MANAGEMENT**
FROM:	[redacted], **HISTORIC ENVIRONMENT RECORD**
REF:	**PA/SCO/2023/4**
DATE:	**15/09/2023**

SUBJECT: **EIA Scoping request for for an order granting development consent for Electric Lines for the North Humber to High Marnham project**

SUMMARY OF ADVICE

- The proposed electricity lines have the potential for indirect impacts on designated and non-designated heritage assets and their settings within North Lincolnshire including the key heritage asset of the Isle of Axholme historic landscape
- The proposed route south of the A18 falls within the Isle of Axholme Area of Special Historic Landscape Interest (ASHLI) protected from adverse development under saved Local Plan Policy LC14 (North Lincs Local Plan 2003)
- There is potential for direct, physical impacts on known and currently unrecorded non-designated archaeological heritage assets throughout the route including potential for well-preserved palaeoenvironmental evidence
- The proposed methodology in the Scoping Report is inadequate as it comprises desk-based assessment without archaeological field evaluation
- **Pre-application archaeological evaluation** will be necessary in North Lincolnshire to inform the EIA baseline and should comprise a staged programme of non-intrusive and intrusive fieldwork (see below)
- This is to identify currently unknown archaeological remains and to adequately assess the heritage significance of all potentially affected archaeological assets
- This will ensure there is sufficient information to assess the impacts of the proposals and design appropriate mitigation in accordance with the relevant national and local planning policies (NPS-EN-1; NPPF, para 194; North Lincolnshire Core Strategy CS6, and North Lincolnshire Local Plan HE5, HE8 and HE9, and LC14)
- All final archaeological evaluation reports should be appended to the ES
- A Heritage and Archaeological Management Plan should be submitted with the ES setting out appropriate measures to avoid harm, enhance and conserve the heritage assets and their settings
- Where harm to archaeological remains is unavoidable and justifiable, the Management Plan should outline the location, scope and extent of appropriate programmes of archaeological excavation and recording in advance of and/or during construction
- The Heritage and Archaeological Management Plan should be appended to the CEMP with other Management Plans.

HISTORIC ENVIRONMENT RECORD (HER) FUNCTION: To hold, maintain, interpret and manage heritage information, enhancing the understanding of the area's historical development as a distinctive and attractive place. HER information provides source material for interpretation by heritage professionals and for use by community groups and individuals. The HER database is updated as new information about the historic environment is discovered.

The HER also provides advice on development proposals that affect, or may affect, the sites and settings of all heritage assets i.e. designated and non-designated historic buildings, archaeological sites and monuments, and historic places, areas and landscapes. This advice is provided against saved local plan policies and national historic environment policies. See https://www.northlincs.gov.uk/planning-and-environment/historic-environment-and-conservation/

DETAILED ADVICE:

Thank you for consulting the HER on this scoping report that includes the Cultural Heritage (Chapter 9). I have previously commented on the draft Cultural Heritage methodology, recommended a number of additional viewpoints for the historic landscape assessment and more recently advised on the route corridor to reduce adverse impacts on the nationally important Isle of Axholme historic landscape.

Given the known and currently unknown archaeological potential along the route of the proposed lines, I have advised that pre-application archaeological field evaluation would be expected to be undertaken to provide the necessary information for an adquate EIA. North Lincolnshire HER provided detailed comments on the draft Cultural Heritage Methodology document in May which remain relevant to the Scoping Report.

Current Heritage Baseline

HISTORIC LANDSCAPE

The historic landscape heritage asset is affected along the full route within North Lincolnshire. HER spatial data of Miller's character areas has been provided but this is not identified on Figures 9-1 and 9-2, accompanying the Scoping Report, nor is it listed in the gazetteer of ND heritage assets Appendix 9A.

The historic landscape is recognised to be nationally significant because it retains the pattern of ancient open strip fields, early enclosures and areas of historic peat cutting or Turbaries. In North Lincolnshire, the area of this unique historic landscape lying to the south of the A18 is locally designated and protected from adverse development under saved Local Plan Policy LC14 'Area of Special Historic Landscape Interest of the Isle of Axholme' (see Appendix 1).

This current policy is not referenced in the Cultural Heritage chapter of the Scoping Report (Table 9.2).

Policy LC14 is supported by the evidence of a detailed survey of the historic landscape character of the Isle of Axholme (Miller, K. 1997 *The Isle of Axholme, Historic Landscape Characterisation Project* Countryside Commission, Leeds; see https://www.northlincs.gov.uk/planning-and-environment/historic-environment-and-conservation/historic-environment-record/historic-landscape-character/).

The Scoping boundary runs through the most sensitive historic landscape characters types of the Ancient Open Strip Fields (AOSF) and Early Enclosed Land (EEL) for much of the route within the protected policy area. The height and scale of the pylons and overhead lines on the lower-lying land has the potential to affect the historic landscape setting within the best-preserved areas of the ancient open strip fields on the raised ridge of the Isle such as at Belton Fields and Church Field Epworth.

The council has recently advised that routing the proposed electricity lines through the Recent Enclosed Land character area, of less sensitivity that the AOSF and EEL character, would reduce the harm, or to underground the cables through the area.

The historic landscape of the Isle of Axholme is a heritage asset of national importance and should be included with higher graded assets and a study area applied of 3km from the Scoping Boundary (9.3.2)

EIA should therefore assess the impacts on the character, appearance and setting of the historic landscape heritage asset as described in the Miller report, including the effects of any proposed mitigation for other EIA topics such as landscaping proposals which may not be appropriate in the

historic landscape. For example, in the relatively open landscape of the Isle of Axholme, trees planting can dramatically alter the landscape character.

The methodology for the historic landscape impact assessment should be based on Historic England's Historic Environment Good Practice Advice Note 3 ('*The Setting of Heritage Assets*' 2nd Edition, 2017) https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/.

The effects on the character and setting of the historic landscape should be assessed in the Cultural Heritage Chapter of the ES from viewpoints previously advised to include but not necessarily limited to the following:

- South of West Butterwick across the Riverside AOSF historic landscape character at public footpath; NGR SE 48330 40525 or SE 48358 40416
- Within Melwood Priory Scheduled Monument NGR SE 48066 40185
- From public footpaths looking SE across Epworth AOSF historic landscape character NGR SE 47916 40415
- From high point along public footpath overlooking Epworth AOSF historic landscape character NGR SE 47786 40702
- From public footpath network at high point on Belton Field AOSF historic landscape character NGR SE 47786 40702
- Proposed Viewpoint 50 Beltoft, consider moving a short distance to the west to encompass the AOSF historic landscape character either side of road travelling toward Beltoft village, or an additional viewpoint for the cultural heritage assessment NGR SE 48035 40686
- Proposed Viewpoint 63 Burton upon Stather, consider moving to public footpath adjacent to St Andrews Church Tower (Listed Grade I) NGR SE 48699 41787

ARCHAEOLOGY

The archaeological baseline included in the Scoping report (9.4.15-9.4.28) for heritage assets in North Lincolnshire is based on the known resource recorded on the HER and indicates the potential for the development areas to contain further unrecorded archaeological remains the significance of which is currently unknown, but could be high.

The majority of archaeological heritage assets recorded in North Lincolnshire are below-ground archaeological remains on agricultural land rather than upstanding earthworks and as such do not lend themselves to easy identification by field observation or walkover survey. They are generally identified from the air or through archaeological prospection techniques such as systematic fieldwalking, metaldetecting, geoarchaeological and geophysical surveys and archaeological excavation. There are also areas along the route of former wetland areas with potential for archaeological and palaeoenvironmental preservation in peat and waterlogged deposits that may masked and not easy to detect by these techniques. The area around Keadby has been previously investigated for wind farm and power station developments but there are considerable areas of the routethat have not been subject to any previous archaeological investigation.

Accordingly, it is considered that there is high potential for unrecorded archaeological heritage assets to be present throughout the route of the proposed electric lines through North Lincolnshire and that archaeological field evaluations will be required to identify currently unknown archaeological heritage assets in accordance with relevant national and local planning policy including NPS EN-1, section 5.8.8-10, paragraph 194 of the NPPF, North Lincolnshire Core Strategy CS6 and saved Local Plan policies HE8 and HE9 (see Appendix 1 below).

Scoping Report

Scoping Report Table 9.2: Relevant Local Planning Policies should include current North Lincolnshire Local Plan policies relevant to cultural heritage issues as well as the draft New Local Plan policies (cf. Bassetlaw). The current saved Local Plan policies include

LC14 Area of Special Historic Landscape Interest of the Isle of Axholme (ASHLI)
HE5 Development and Listed Buildings
HE8 Ancient Monuments
HE9 Archaeological Evaluation

Table 9.3 Engagement with local authorities
The response to our advice on additional viewpoints for assessment of effects on the Isle of Axholme historic landscape does not confirm that the Cultural Heritage assessment will consider these views.
The response to our advice that desk-based assessment without the results of archaeological field evaluation would be inadequate is not sufficiently clear that the applicant intends to undertake a staged and systematic field evaluation along the route to inform the ES. We reiterate our advice that archaeological field evaluation is necessary in North Lincolnshire to inform the ES and application. A staged programme of fieldwork along the route needs to be undertaken at the earliest stage. We note that we do not consider evaluation to be mitigation. Evaluation is necessary to identify and assess significance to be taken into account in the ES and decision making process.

As noted above, the historic landscape heritage asset is affected along the full route within North Lincolnshire. HER spatial data of Miller's character areas has been provided but this is not identified on Figures 9-1 and 9-2, accompanying the Scoping Report, nor is it listed in the gazetteer of ND heritage assets Appendix 9A.

With regard to future access for archaeological investigations beneath OHL being dependent on access rights under a DCO, we would reiterate our preliminary advice that where such considerations would prevent future archaeological investigation, such investigations must be conducted for this development.

Study Area 9.3.2 The Isle of Axholme Historic Landscape heritage asset is of national importance and should be included with the higher graded assets and the study area of 3km from the Scoping boundary.

Baseline Conditions 9.4.2 Consistent with our previous advice that desk based Data Sources are inadequate to establish the baseline for the EIA, the results of archaeological field evaluation are required in North Lincolnshire to inform the baseline and future baseline environment, to identify heritage assets that may be affected and assess their significance.

9.4.3 The Isle of Axholme Historic Landscape heritage asset is not included on the figures. The individual character areas (Miller, 1997) should to be shown on the figure 9-1; HER spatial data has been provided.

9.4.28 Policies for the Isle of Axholme Historic Landscape heritage asset should refer to the current saved Local Plan Policy LC14 from 2003 onwards, this is a long-established policy of North Lincolnshire council.

9.5.1 Embedded Measures. This will require field evaluation to identify and assess known and currently unknown archaeological heritage assets.

9.5.2 North Lincolnshire council has provided detailed advice on the route corridors and graduated swathe to minimise adverse harm to the ASHLI.

9.5.4 Control Measures:

GG03 The suite of Management Plans should include a Cultural Heritage and Archaeology Management Plan setting out the proposed mitigation measures

H02 We consider that the discovery of a previously unknown heritage asset after effective evaluation should only ever be a residual risk on a construction project of this scale. Archaeological field evaluation undertaken to inform the EIA should have identified the extent of known sites and any currently unknown archaeological heritage assets to allow the preparation and undertaking of the appropriate mitigation techniques in a timely fashion prior to/during construction works to avoid any unnecessary delay to the project timetable.

9.6.5 Sources of operational impacts. We consider that the viability of heritage assets, ie the preservation of their significance, includes the ability of future generations (within the next few decades) to study the archaeological interest.

9.6.7 As noted, the ASHLI heritage asset and historic landscape character areas are not included on these figures or the appendix.

Table 9.4 Impacts and the potential for significant effect. Impacts to the access of heritage assets during Operation could result in significant effects where archaeological techniques such as geophysical suveys are affected by increased magnetic fields and use of machines for archaeological investigation

beneath and adjacent to the lines is prevented. Where the new line runs in parallel with the existing this may effectively sterilize a considerable swathe for future archaeological investigation.

Maintenance of the existing overhead lines has shown that there can be additional physical impacts on archaeological heritage assets, for example the requirement for new access tracks and working platforms. This could be potentially be a significant effect requiring mitigation for maintenance to be considered in the Archaeological Management Plan.

Impact Pathways with Receptors (Step 2) sic
9.6.10 We note that to identify any significant impacts on archaeological heritage assets, known and currently unknown, will require the results of archaeological field evaluation.

Table 9.5 Impact pathways with receptors
Construction Temporary impacts to a heritage assets as a result of changes to their setting. The historic landscape is a heritage asset to be considered as other designated and non-designated heritage assets and should be Scoped In.

Operation Impacts to heritage assets as a result of changes to their setting, should also include loss of access for future investigation of archaeological heritage assets.

9.7 Proposed Assessment Methodology

Study Area
9.7.2 – 9.73 As previously advised, 1km is considered acceptable for non-designated heritage assets and archaeology, but the ASHLI should be considered as a higher graded asset due to its national importance and a 3km distance employed for the assessment.

9.7.4 It would have been useful for a ZTV to be included in the Scoping Report so that the study areas could be confirmed at Scoping, given that it is unclear who will decide the extended areas for heritage assets. In particular the ASHLI heritage asset has a greater influence over the wider landscape. Clearly, any further scoping will need to be agreed with the local authority.

Proposed Data Sources
9.7.5 – 9.7.6 In North Lincolnshire the proposed data sources will need to include the results of archaeological field evaluation.

Technical Guidance
9.7.7 This list should include the CIfA Standard and Guidance for Evaluation, the EAC geophysical survey guidelines and relevant Historic England professional guidelines for archaeological fieldwork.

EIA ASSESSMENT– SCOPING ADVICE

The Scoping Report (Table 9.3) states that 'desk-based assessment will be carried out and the results of this will be included in the ES. The scope of any archaeological evaluation fieldwork will be discussed with the Council as the Project progresses and, if required, the results will be included in the ES.'

For clarity, we consider that the EIA heritage baseline and assessment must be informed by the results of **pre-application archaeological field evaluation.**

This is to identify and assess the significance of the known and currently unknown archaeological remains across the development area and to ensure there is sufficient information to assess the impacts of construction and operation, and to design and prepare the Archaeological Management Plan for mitigation strategies that may include avoidance measures and/or the development of outline programmes of work for archaeological excavations and recording. This will inform the decision-making process in accordance with all the relevant and current national and local planning policies.

The heritage assessment should consider the interrelationships and impacts between heritage/archaeology/historic landscape and the other topics covered in the EIA such as Ground Conditions, Hydrology, LVIA and Landscaping Plans

The archaeological heritage assessment should comprise **ALL** the following iterative stages:

1. Desk Based Research

- Collation and synthesis of existing historic environment data sources relating to **all** heritage assets that the proposed development may affect directly or indirectly. The spatial scope for the proposed development should be a minimum 3km for designated heritage assets and the Isle of Axholme historic landscape, and 1km for non-designated heritage assets and should provide the context for the subsequent archaeological fieldwork, including appropriate research objectives.
- Data gathering should include but not be limited to the following available sources: the North Lincolnshire Historic Environment Record and other relevant national and local heritage databases; Portable Antiquities Scheme database; local archives; historic maps and plans; aerial photographs, drone survey and LIDAR data including transcription of all identified features; geo-technical and geo-archaeological data to produce a preliminary deposit model; and other published and unpublished documents
- Walkover to identify the presence of any above or below ground archaeological remains or historic landscape features within the application area and/or any constraints on the following stages of archaeological fieldwork

2. Pre-Application Archaeological Field Evaluation

- Systematic fieldwalking and metal detection for surface collection of archaeological artefacts, to identify the range and distribution of all materials and plot potential archaeological features
- Measured survey of upstanding earthwork remains to assess survival, condition and potential for reinstatement following construction
- Geophysical survey of the proposed site to identify and plot anomalies of potential archaeological origin using magnetometry, resistivity or other appropriate techniques;
- Excavation of sample trial trenches to determine the nature, extent, state of preservation and importance of any archaeological remains within the proposed development area informed by the results of preceding stages of research and survey
- Archaeological monitoring and recording opportunities during geo-technical investigations.
- Specifications for each stage should be agreed with the HER prior to commencement, to accord with the HER brief for evaluation, and with the relevant Chartered Institute for Archaeologists published Standards and Guidance (http://www.archaeologists.net/) and Historic England professional guidelines (https://www.historicengland.org.uk/images-books/publications)
- All stages of archaeological field evaluation should be carried out by a suitably experienced archaeological contractor, such as a Registered Organisation accredited by the Chartered Institute for Archaeology (see http://www.archaeologists.net/) or an organisation that can demonstrate that they have equivalent experience, capability and quality management systems in place. The appointed contractor must have access to appropriate geo-archaeological expertise.
- All fieldwork should be undertaken in accordance with CIFA's published Standards and Guidance for evaluation, and Historic England professional guidelines (https://www.historicengland.org.uk/images-books/publications) to written specifications that have been agreed with the HER prior to commencement.

3. Assessment of Significance

- Assessment of the significance of those heritage assets and their settings likely to be directly or indirectly impacted by the development; the assessment of the significance of heritage assets will take account of the combined results of all the preceding stages of desk based assessment and archaeological field evaluation, and be based on the heritage values set out in *Conservation Principles, Policies and Guidance for the sustainable management of the historic environment*, Historic England, 2008 https://www.historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/.
- The methodology of assessing the contribution of setting to signicance should be undertaken as set out in Historic England's Historic Environment Good Practice Advice Note 3 ('The Setting of Heritage Assets' 2nd Edition, 2017) https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/.
- The use of photographic visualisations from appropriate viewpoints along the pipeline corridor swould be of particular use to demonstrate indirect effects of the proposals on settings, including evidence of no effects. Impacts other than visual, such as noise, dust and odour, should also be considered. Viewpoints should be agreed with the HER and planning case officers.

4. Assessment of Impact

- Assessment of impacts of the proposed development on the significance of the heritage assets and their settings based on the findings of the preceding stages, with reference to details of proposed construction ground works in relation to archaeological assets, and justification of

impacts explaining why the works would be necessary or desirable, including any benefits or heritage enhancements which justify any resulting harm. In the case of substantial harm or loss of significance, the relevant tests in the NPPF should be applied.
- Consideration must also be given for future accessibility to conduct archaeological investigations to ensure the archaeological interest is maintained and available for future generations to investigate.

5. Mitigation
- An explanation of any measures taken to avoid, minimise or mitigate any harm to the significance of the heritage asset/s, including within their settings.
- Where harm is unavoidable, measures to offset the harm to significance should be included
- Measures to enhance heritage assets and engender community participation and appreciation

Assessing the value of heritage asset and the magnitude of change (see 9.7, Scoping Report) should take place on completion of **ALL** stages of the field evaluation set out above. The Cultural Heritage chapter of the EIA should be completed and the Environmental Statement should include the results of all historic environment and archaeological fieldwork reports.

The Environmental Statement should consider what the impact of the development on the significance of the heritage assets will be together with a statement of justification of why the works would be desirable or necessary, including any benefits which justify any resulting harm. In the case of substantial harm or loss of significance, the tests in the NPPF should be applied.

If the assessment demonstrates that the significance of heritage assets will be adversely affected by the proposals, then appropriate mitigation measures should be drawn up to conserve them. This may include avoiding or minimizing effects to areas of significance, if necessary by modifying the layout and/or design of the proposals ie. In situ preservation.

Alternatively, where harm is unavoidable and loss of heritage assets as a result of development is considered justified, provision should be made to record the evidence before it is lost either in advance of, or during, development.

Mitigation measures should be included in the ES and set out in a Heritage and Archaeological Management Plan. The Plan should describe any archaeological exclusion zones with details of how these would be implemented and maintained, and any other construction methods to avoid harm to heritage assets. The strategy should outline the scope and extent of appropriate programmes of further archaeological excavation and recording where harm to archaeological remains is unavoidable. These programmes would be detailed in subsequent Written Schemes of Investigation to be prepared by archaeological contractors implementing the works.

Where a DCO may subsequently be granted, the implementation of an agreed Management Plan can be secured by an appropriately worded Requirement.

Recommendation

A DCO application submitted for this pipeline proposal would need to be accompanied by an adequate Cultural Heritage assessment as set out above to inform the EIA and accord with paragraph 194 of the NPPF, Core Strategy CS6 and saved Local Plan policies HE5, HE8 and HE9.

Where the heritage assessment in the EIA is considered to be incomplete or inadequate, the HER will advise the local planning authority for the Local Impact Report.

[redacted]
Historic Environment Officer
[redacted]

APPENDIX 1

Relevant Policy

The information required in the Applicant's Assessment is set out in Sections 5.8.8-10 of the National Policy Statement for Energy (EN-1, 2011) as follows:

5.8.8 As part of the ES (see Section 4.2) the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance. 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 the significance of the heritage asset. As a minimum the applicant should have consulted the relevant Historic Environment Record120 (or, where the development is in English or Welsh waters, English Heritage or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact.

5.8.9 Where a development site includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, representative visualisations may be necessary to explain the impact.

5.8.10 The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents.

The National Planning Policy Framework (NPPF, 2021) provides guidance to local authorities for conserving and enhancing heritage assets and their settings, which includes archaeological sites and remains. Paragraph 8 refers to the role of the planning system to contribute to achieving sustainable development under three overarching objectives; economic, social and environmental. The environmental objective includes contributing to protecting and enhancing the historic environment.

Section 16 (paragraphs 189-208) of the NPPF details the government's approach to conserving and enhancing the historic environment. Paragraph 189 describes heritage assets as '**an irreplaceable resource**' to be '**conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations**'.

Paragraph 194 requires an applicant to submit information that identifies any heritage asset that their proposals may affect, and that assesses the significance of the assets including the contribution of their settings. Consultation of the local HER is the minimum requirement in this process. Paragraph 194 states that **'Where a site on which development is proposed includes, or has the potential to include, heritage assets of archaeological interest, local planning authorities should require developers to submit an appropriate desk based assessment and, where necessary, a field evaluation.'**

This information should be sufficient to understand the potential impact of the proposal on the significance of any affected heritage assets. It should also allow the local planning authority to assess the degree of impact on the heritage assets and their settings, and how this impact may be mitigated, by avoiding or minimising any conflict between conserving the asset and any aspect of the proposal (NPPF 195).

Such assessment allows the planning authority to make an informed and reasonable decision in line with the sustainable development principles of the NPPF, as well as local planning Plan policies HE8 Ancient Monuments and HE9 Archaeological Evaluation.

Core Strategy policy CS6 states that **'The council will seek to protect, conserve and enhance North Lincolnshire's historic environment as well as the character and setting of area 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….Development proposals should provide archaeological assessments where appropriate.'***.*

HE5 – Development affecting Listed Buildings **'The Council will seek to secure the preservation, restoration and continued use of buildings of special architectural or historic interest. When applications for planning permission relating to a listed building or listed building consent are being assessed,the primary consideration will be the need to preserve or enhance the fabric and character of the building. Permission or consent will not be granted unless it has been demonstrated that the proposed works would secure this objective. The Council will encourage the retention and restoration of the historic setting of listed buildings. Proposals which damage the setting of a listed building will be resisted. Whenever appropriate, proposals which would entail the loss of historic fabric from a listed building will be conditional upon a programme of recording being agreed and implemented.'**

Where Scheduled Monuments, or sites of equivalent significance, are affected directly or indirectly, Local Plan policy HE8 directs **'Development proposals which would result in an adverse effect on Scheduled [Ancient] Monuments and other nationally important monuments, or their settings, will not be permitted.'**

HE9 Archaeological Evaluation states that **'Where development proposals affect sites of known or suspected archaeological importance, an archaeological assessment to be submitted prior to the determination of a planning application will be required. Planning permission will not be granted without adequate assessment of the nature, extent and significance of the remains present and the degree to which the proposed development is likely to affect them.**

Sites of known archaeological importance will be protected. When development affecting such sites is acceptable in principle, mitigation of damage must be ensured and the preservation of the remains in situ is a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavation and recording before and during development.'

Local Plan Policy LC14 will apply which states:

'The Isle of Axholme is designated as an area of Special Historic Landscape Interest.

Within this area, development will not be permitted which would destroy, damage or adversely affect the character, appearance or setting of the historic landscape, or any of its features.

Development required to meet the social and economic needs of rural communities and small scale tourist and outdoor sport and recreational development will be permitted provided such development is related to the historic landscape and its features.

A high standard of design and siting in new development will be required reflecting the traditional character of buildings in the area and the character of the historic landscape, and using materials sympathetic to the locality.

Schemes to improve, restore or manage the historic landscape will be sought in connection with, and commensurate with the scale of, any new development affecting the area of Special Historic Landscape Interest.'

Case officer: [redacted]
Telephone: [redacted]
Email: planning@northlincs.gov.uk

North Lincolnshire Council

www.northlincs.gov.uk

[redacted]
Director of Business Development
Church Square House
30-40 High Street
Scunthorpe
North Lincolnshire
DN15 6NL

Your Ref: EN020034-000007
Our Ref: PA/SCO/2023/4

Date: 18 September 2023

The Planning inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Sent by email only – northhumbertohighmarnham@planninginspectorate.gov.uk

Dear Sir/Madam

Scoping Consultation – Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 – The North Humber to High Marnham project.

Thank you for your letter dated 21 August 2023 seeking a view from North Lincolnshire Council in respect of the information to be provided in an Environmental Statement to be produced in support of a Development Consent Order application by National Grid Electricity Transmission for the North Humber to High Marnham project..

Having considered the submitted scoping report North Lincolnshire Council would like to make the following comments regarding the information that should be included within the Environmental Statement:

Air Quality

The Scoping Report confirms that an air quality assessment will be submitted with the future application which includes:

- Construction fugitive dust emissions
- Construction vehicle emissions (should screening of construction traffic flows show vehicle trips exceed EPUK/IAQM Guidance)

Operational phase air quality impacts have been screened out of further assessment.

The Local Planning Authority is content with this conclusion.

Contaminated Land

The proposed route, at some locations, is in close proximity to former landfill sites and other potentially contaminative land uses as identified in Figure 11-4.

The councils contaminated land planning guidance document detailed below and produced in collaboration with other local authority Yorkshire and Lincolnshire Pollution Advisory Group (YALPAG) members is available on the councils web site at the following link:

http://www.northlincs.gov.uk/planning-and-environment/environmental-health/pollution-air-land-and-water/contaminated-land/

It recommends that where a proposed development introduces a vulnerable end use and/or the development site could be affected by a former potentially contaminative land use, the possibility of land contamination should always be considered. In these circumstances a **Phase 1** assessment should be submitted as a minimum, which includes a desk top study, a site walkover and a conceptual site model.

Only a site specific investigation can establish whether there is contamination at a particular site, however a desk study and site walkover may be sufficient to identify how pollutant linkages might be broken. Unless this initial assessment clearly demonstrates that the risk from contamination can be satisfactorily reduced to an acceptable level, further site investigations and risk assessment will be needed before the application can be determined. After remediation, as a minimum land should not be capable of being determined as contaminated land under Part 2Aof the Environmental Protection Act 1990.

The LPA therefore request the submission of a Phase 1 report in support of the application. This will demonstrate whether further assessment of the site is required.

Cultural Heritage

Having reviewed Chapter 9 of the Scoping Report the local planning authority has concerns with the proposed approach to the assessment of cultural heritage. A summary of these concerns is provided below and they are outlined fully in the appended response from the councils Historic Environment Record dated 15/09/2023:

The proposed electricity lines have the potential for indirect impacts on designated and non-designated heritage assets and their settings within North Lincolnshire including the key heritage asset of the Isle of Axholme historic landscape.

The proposed route south of the A18 falls within the Isle of Axholme Area of Special Historic Landscape Interest (ASHLI) protected from adverse development under saved Local Plan Policy LC14 (North Lincs Local Plan 2003).

There is also potential for direct, physical impacts on known and currently unrecorded non-designated archaeological heritage assets throughout the route including potential for well-preserved palaeoenvironmental evidence.

The proposed methodology in the Scoping Report is considered to be inadequate as it comprises desk-based assessment without archaeological field evaluation.

Pre-application archaeological evaluation will be necessary in North Lincolnshire to inform the EIA baseline and should comprise a staged programme of non-intrusive and intrusive fieldwork.

This is to identify currently unknown archaeological remains and to adequately assess the heritage significance of all potentially affected archaeological assets.

This will ensure there is sufficient information to assess the impacts of the proposals and design appropriate mitigation in accordance with the relevant national and local planning policies (NPS-EN-1; NPPF, para 194; North Lincolnshire Core Strategy CS6, and North Lincolnshire Local Plan HE5, HE8 and HE9, and LC14.

All final archaeological evaluation reports should be appended to the ES.

A Heritage and Archaeological Management Plan should be submitted with the ES setting out appropriate measures to avoid harm, enhance and conserve the heritage assets and their settings.

Where harm to archaeological remains is unavoidable and justifiable, the Management Plan should outline the location, scope and extent of appropriate programmes of archaeological excavation and recording in advance of and/or during construction.

The Heritage and Archaeological Management Plan should be appended to the CEMP with other Management Plans.

Ecology/Ornithology

The surveys proposed in section 8.7 of the submitted EIA Scoping Report Chapter 8 appear sensible. The proposed approach has taken into account our pre-scoping advice, issued in May of this year.

Flood Risk and Drainage

The Lead Local Flood Authority has no objection to the proposed approach to the assessment of the potential impacts in respect of flood risk and drainage.

However, it is noted that the site lies within the Internal Drainage Board area of jurisdiction, so they need to be consulted on discharge rates/connections/alterations to the watercourse network.

This consultation should form part of the development of the surface water drainage strategy required to support the application.

Landscape and Visual Amenity

The proposed approach to landscape impacts, as set out in the submitted EIA Scoping Report Chapter 6, has taken into account our pre-scoping advice, issued in May of this year and appears to be appropriate.

Similarly, the proposed approach to visual impacts, as set out in the submitted EIA Scoping Report Chapter 7, closely matches our pre-scoping advice, issued in May of this year and is considered to be acceptable.

Local Planning Policy

The Scoping Report at Chapter 2 identifies the relevant development plan documents for North Lincolnshire and also recognises that the new North Lincolnshire Local Plan is currently at an early stage of examination. It is considered that the correct policy documents have been identified to allow a robust assessment of the planning policy context relevant to North Lincolnshire.

Noise

The Scoping Report confirms that a noise assessment will be submitted with any future application which includes:

- Construction phase noise and vibration impact
- Construction phase traffic noise

Operational phase noise impacts have been screened out of any future assessment with the following justification:

> *"Operational noise from the OHL is not likely to be significant at nearby NSRs under any weather conditions owing to the proposed 'triple Araucaria' conductor bundle (section 15.5) and is therefore proposed to be scoped out of the noise and vibration assessment. Should the iterative design process result in alternative conductor types being used, consideration for this would be assessed within the noise and vibration assessment.*
>
> *Technical information would be submitted as part of the application for development"*

The LPA support the need for technical information to be submitted within any future application to fully justify this matter.

Traffic and Transport

Having reviewed Chapter 13 of the Scoping Report, the local highway authority are content with the proposed approach to assessing the Traffic and Transport impacts of the proposed development.

Socio Economic



From: Before You Dig
To: North Humber to High Marnham
Cc: Before You Dig
Subject: RE: EN020034 - North Humber to High Marnham - EIA Scoping Notification and Consultation
Date: 22 August 2023 11:50:45
Attachments: [redacted]

Good morning,

NGN has a number of gas assets in the vicinity of some of the identified “site development” locations. It is a possibility that some of these sites could be recorded as Major Accident Hazard Pipelines(MAHP), whilst other sites could contain High Pressure gas and as such there are Industry recognised restrictions associated to these installations which would effectively preclude close and certain types of development. The regulations now include “Population Density Restrictions” or limits within certain distances of some of our “HP” assets.

The gas assets mentioned above form part of the Northern Gas Networks “bulk supply” High Pressure Gas Transmission” system and are registered with the HSE as Major Accident Hazard Pipelines.
Any damage or disruption to these assets is likely to give rise to grave safety, environmental and security of supply issues.

NGN would expect you or anyone involved with the site (or any future developer) to take these restrictions into account and apply them as necessary in consultation with ourselves. We would be happy to discuss specific sites further or provide more details at your locations as necessary.

If you give specific detailed site locations, we would be happy to provide gas maps of the area which include the locations of our assets.
(In terms of High Pressure gas pipelines, the routes of our MAHP’s have already been lodged with members of the local Council’s Planning Department)

Kind regards,

[redacted]

Administration Assistant
Before You Dig
Northern Gas Networks
1st Floor, 1 Emperor Way
Doxford Park
Sunderland
SR3 3XR

Before You Dig: 0800 040 7766 (option 3)
www.northerngasnetworks.co.uk
facebook.com/northerngasnetworks
twitter.com/ngngas
Alternative contact:
beforeyoudig@northerngas.co.uk



Get involved! Have your say in the future of your gas network and win great prizes, by taking part in our BIG customer survey at together.northerngasnetworks.co.uk Keep posted to take part in a range of activities from workshops to roadshows. Together, we are the network.

Northern Gas Networks Limited (05167070) | Northern Gas Networks Operations Limited (03528783) | Northern Gas Networks Holdings Limited (05213525) | Northern Gas Networks Pensions Trustee Limited (05424249) | Northern Gas Networks Finance Plc (05575923). **Registered address:** 1100 Century Way, Thorpe Park Business Park, Colton, Leeds LS15 8TU. Northern Gas Networks Pension Funding Limited Partnership (SL032251). **Registered address:** 1st Floor Citypoint, 65 Haymarket Terrace, Edinburgh, Scotland, EH12 5HD.
For information on how we use your details please read our Personal Data Privacy Notice

This matter is being dealt with by:
[redacted]
Reference: EN020034-000007
T [redacted]
E [redacted]
W nottinghamshire.gov.uk

Nottinghamshire County Council

Sent via email to:

northhumbertohighmarnum@planninginspectorate.gov.uk

18th October 2023

Dear Katie

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Thank you for your email dated 21st August 2023 requesting strategic planning observations on the above document. I have consulted with my colleagues across relevant divisions of the County Council and have the following comments to make.

In terms of the County Council's responsibilities there are a number of elements of national planning policy and guidance that are of particular relevance in the assessment of such applications, these include Transport and Public Health.

Rights of Way

NCC are happy to see that the potential impacts on the network, such as mitigation/effect on views, management of the network during construction and impacts on public use will be considered in the application and are addressed in the visual study (Ch 7), recreation (Ch 13) and traffic/transportation (Ch 16).

NCC will provide further details, if necessary, in the next stage of the application.

Archaeology

The Environmental Scoping Report for the North Humber to High Marnham Great Grid Upgrade sets out the proposed approach regarding Heritage in Chapter 9.

The details of the scheme such as route are currently not defined but archaeological assessment and evaluation will help to meet the stated aims of avoiding designated assets and non-designated assets of equivalent value and minimizing impacts on other heritage assets and considerations such as setting. Sufficient evaluation is essential to inform the scheme and ensure that the subsequent design and work programme is devised with an understanding of the level of archaeological work that may be required before and during the construction phase, and whether any work would be required to mitigate impacts from future maintenance and decommissioning.

The Environmental Impact Assessment (EIA) will require a desk-based assessment as stated in Chapter 9 which will identify areas for follow-up evaluation including non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact. Non-intrusive techniques and intrusive evaluation are affective for management of archaeological risk. The results of this work should be used to minimise the impact on the historic environment, provide input to project scheduling and to inform the design. This in turn will inform the production of an appropriate archaeological mitigation strategy.

The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), and the National Planning Policy Framework. Failing to adequately assess the archaeological potential could lead to unnecessary destruction of heritage assets, potential programme delays and cost increases that could otherwise be avoided.

The details of any surveys and evaluation will need to be agreed as early as possible and each stage of investigation will inform the nature, location and extent of the next.

Highways

NCC have no comments at this stage. A Transport Assessment will be submitted at a later stage of the application and NCC will be happy to agree the scope with the relevant highway authorities.

It should be noted that consideration should be given to the redevelopment of West Burton with the STEP fusion plant, from a highways perspective.

Ecology

NCC have reviewed the EIA Scoping Report documents for the North Humber to High Marnham grid upgrade project, specifically Volume 1, chapter 8 (Ecology and Biodiversity) and associated figures in Volume 3, but only in relation to that part of the project lying within Nottinghamshire.

NCC are in agreement with the proposed scope of the EIA, which looks to be comprehensive and accords with recognised guidelines for such assessments. NCC however, have the following comments:

- Para. 8.4.5 refers to Nottinghamshire's Notified Road Verges, and the need to request this information - NCC can supply this data when required.
- Regarding proposed VP surveys for birds, it is stated that work is ongoing to determine a short-list of VPs that will be taken forward to the final survey design. It would be useful to better understand what criteria are being used for this exercise, noting that in Nottinghamshire the route lies between the River Trent to the east and a number of important wetland sites to the west, such as the Idle Washlands and Idle Valley Nature Reserve (as identified in the pre-scoping engagement).

Flood Risk

NCC have reviewed the EIA scoping report, this appears to suitably note all relevant policy and consents and as such the LLFA have no comments to make at this stage.

Economic Development

This is a comprehensive scoping report. The main socio-economic impacts appear to be identified and scoped in.

The report needs to consider the impact on these other major renewable energy projects. Notably the East Coast Hydrogen Strategy roadmap and the STEP Fusion project.

There is an odd reference to there being no socio-economic legislative framework, whilst also citing the equalities act and separately potential crime impacts. There is plenty of employment legislation for disabilities and NEET provision which could also want a specific mention. As an anchor institution the report could better identify how the hardest to engage employment groups are to be impacted, particularly bearing in mind the potential for the project to support the Government mission statements on levelling up.

Public Health

Please refer to Appendix 1 which sets out further information in relation to Public Health.

Conclusion

It should be noted that all comments contained above could be subject to change, as a result of ongoing negotiations between the County Council, the Local Planning Authority and the applicants. These comments are based on the information supplied and are without prejudice to any comments the County Council may make on any future planning applications submitted for this site.

Should you require any further assistance in relation to any of these matters please do not hesitate to contact me.

Yours faithfully

[redacted]
Principal Planning Officer
Nottinghamshire County Council

This document is unsigned as it is electronically forwarded. If you require a signed copy, then please contact the sender.

Appendix 1 – Public Health

The Public Health response is outlined below however if any further information is required, the Public Health team will be able to provide further advice via email planning.publichealth@nottscc.gov.uk

The Nottinghamshire Health and Wellbeing Strategy sets out the ambitions and priorities for the Health and Wellbeing Board with the overall vision to improve the health and wellbeing of people in Nottinghamshire:

- To give everyone a good start in Life
- To have healthy and Sustainable places
- To enable healthier decision making
- To work together to improve healthcare services

The Nottinghamshire Joint Strategic Needs Assessment (JSNA) provides a picture of the current and future health needs of the population of the county. This is a useful source of information when considering the health and wellbeing of residents in planning process.

The use of local health profile report pulls together existing information in one place about localities affected by a development proposal, highlights issues that can affect health and wellbeing of residents covered within the planning process. Promoting health and wellbeing enhances resilience, employment and social outcomes. For example, consider limiting long term illness or disability as part of the development needs of a localities to ensure that it is age friendly providing good access to health and social care facilities.

The Nottinghamshire Spatial Planning and Health Framework identifies that local planning policies play a vital role in ensuring the health and wellbeing of the population and how planning matters impact on health and wellbeing locally. In addition, a health checklist is included to be used when developing local plans and assessing planning applications:

It is recommended that this checklist is completed to enable the potential positive and negative impacts of the EIA on health and wellbeing to be considered in a consistent, systematic and objective way, identifying opportunities for maximising potential health gains and minimizing harm and addressing inequalities taking account of the wider determinants of health.

Obesity is a major public health challenge for Nottinghamshire. Obesity is a complex problem with many drivers, including our behaviour, environment, genetics and culture. Nearly a quarter of children in England are obese or overweight by the time they start primary school aged five, and this rises to one third by the time they leave aged 11.

To address Childhood Obesity in 10-11-year olds. It is recommended that the six themes by the TCPA document Planning Healthy Weight Environments' are considered to promote a healthy lifestyle as part of this application.

In addition to Active Design Sport England 10 principles that promote activity, health and stronger communities through the way our towns and cities are built and designed to encourage activity in our everyday lives.

The six TCPA themes are:

1. Movement and access: Walking environment; cycling environment; local transport services.
2. Open spaces, recreation and play: Open spaces; natural environment; leisure and recreational spaces; play spaces.
3. Food: Food retail (including production, supply and diversity); food growing; access.
4. Neighbourhood spaces: Community and social infrastructure; public spaces.
5. Building design: Homes; other buildings.
6. Local economy: Town centres and high streets; job opportunities and access.

The Ten Principles of Active Design.

1. Activity for all
2. Walkable communities
3. Connected walking & cycling routes
4. Co-location of community facilities
5. Network of multifunctional open space
6. High quality streets & spaces
7. Appropriate infrastructure
8. Active buildings
9. Management, maintenance, monitoring & evaluation
10. Activity promotion & local champions

Please note for major developments (over 25 dwellings) the Clinical Commissioning Groups (CCG) should be consulted for impact on primary care which may lead to a request for infrastructure support through S106/CIL.

Bassetlaw developments contact Bassetlaw Strategic Estates Group. Nottinghamshire developments email the Nottingham and Nottinghamshire Estates team Noweccg.estates@nhs.net

From: [redacted]
To: North Humber to High Marnham
Subject: EN020034 - North Humber to High Marnham - EIA Scoping Notification and Consultation
Date: 11 September 2023 22:20:34

Dear Sir/Madam

I can confirm that Rotherham Council have no comments to make on the EIA scoping notification.

Regards

[redacted]
Development Management Officer
Planning & Regeneration Service
Environment & Development Services

Tel [redacted]

Email: [redacted]
Visit our website: http://www.rotherham.gov.uk
Apply for planning permission online
Visit www.planningportal.co.uk/applications

Proposed DCO Application by National Grid Energy Transmission (NGET) for North Humber to High Marnham

Royal Mail response to ES Scoping Consultation

Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.

Royal Mail's advisor BNP Paribas Real Estate has reviewed the ES Scoping Report for this scheme dated August 2023. There are numerous operational Royal Mail properties within 10 miles of the scoping area, the nearest operational facilities being at Brough, Hessle, Scunthorpe and Gainsborough.

The construction of this infrastructure proposal has been identified as having potential to impact on Royal Mail operational interests. However, at this time Royal Mail is not able to provide a consultation response due to insufficient information being available to adequately assess the level of risk to its operation and the available mitigations for any risk. Consequently, at this point Royal Mail wishes to reserve its position to submit a consultation response/s at a later stage in the consenting process and to give evidence at any future Public Examination, if required.

In the meantime, any further consultation information on this infrastructure proposal and any questions of Royal Mail should be sent to:

[redacted], **Senior Planning Lawyer, Royal Mail Group Limited**

[redacted] **Director, BNP Paribas Real Estate**

Please can you confirm receipt of this holding statement by Royal Mail.

End

South Cave Parish Council

The Town Hall, 42 Market Place, South Cave, East Yorkshire HU15 2AT

Telephone/Fax 01430 421044

website: www.southcavepc.gov.uk e-mail: clerk@southcavepc.gov.uk

The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Your Reference: EN020034-000007

5th September 2023

RE: National Grid – North Humber to High Marnham – Scoping Consultation

The South Cave Parish Council discussed the consultation.

The Parish Council's original recommendation which was submitted, for the proposed route from Woodale to past Broomfleet, would be to run cables underground. This would ensure no settlement would be enclosed within two rows of surface pylons.

The Parish Council raised the following concerns relating to the proposals, which include the impact on the economy, environment, wildlife & visual amenity of the area:

1. Overhead high voltage power lines are not a 'fit and forget' piece of infrastructure, they will require access by both land and air, for maintenance purposes including component replacement, painting etc. and create significant noise especially when the air is damp, and also the possible health risks.

2. Visual Amenity impact on the Conservation Area if the lines are overhead.

3. The importance of the views and footpath of the Wolds Way should be preserved along with the mature woodlands.

4. From the interactive maps supplied, they have a very narrow corridor across Woodale and Mount Airy which would grossly impact the landscape, natural habitat and the Wolds Way National Trail.

5. Concerns in terms of the impact this plan and its infrastructure will cause a negative impact on property prices.

6 urther ınformat on and eassurance equıred wit rega ds o e ectrıcity force fields partıcularly at the Cross Over poın a d the potent al mpact on the h al h of hum ns a d l ves ock

7 Concerns expr sse ha the lınes could beco e a ecologıcal trap, partıcularly h regards to mıgratıng ds The mber 's part o the UNESCO as a tı h ghway We are the pathway that thous ds of birds cross and World Herita e are ın t e process o makıng the Humbe a Wo ld Heritage P otected sı e More overhe pylons would obst theı ro te especıally wı h the h'cker new lines at a p oposed he area ıs ome to a number of we and s es, where varıo s pec es o b rds flock the hundreds/thousa ds

The way we ge rate electrıcity ın the UK s c a g g rapıdly, a d we are transitionıng to cheaper cleane , and more secure forms of energy such as the new offshore wındfarms The Parısh Counc unde and and support that but not a any cost We a e strıvıng to move forward, so le s move forward away from archaıc n rastructure syste s

Fınally the Parıs Councıl Support Rt. Hon [redacted] comments relating to the envıronmental and visual mpact on areas of ıgh andscape va ue, a copy of the lette ıs attached fo your eference togethe with supportıng letter/report produced by the Yorksh're Wild ıfe Trust

Yours Fa thfu y

[redacted]

Clerk & Responsıble Fınanc al Officer

South Cave Parısh Counc l

The Rt Hon David Davis MP

HOUSE OF COMMONS

LONDON SW1A 0AA

[redacted]
Chief Executive
National Grid
1 - 3 Strand
London
WC2N 5EH

26 July 2023

Dear [redacted]

I am writing regarding the National Grid Electricity Transmission (North Humber to High Marnham) Stage One Consultation.

Ellerker and South Cave Parish Councils have both expressed concerns to me, on behalf of many of my constituents, that the proposed electricity transmission line would do significant damage to the life of the local community. I share their concerns about the project entirely.

Everyone recognises the vital importance of expanding our renewable energy capacity and of upgrading the electricity grid to satisfy growing demand. But that task need not involve riding roughshod over the protection of beautiful natural landscapes and over local residents' concerns.

My constituents are quite legitimately concerned with maintaining the amenity and attractiveness of their villages, and have over a number of years put significant time and money towards that end. If these proposals are approved, then Ellerker and Broomfleet in particular could be completely surrounded by pylons and electrical lines.

My view, and the view expressed by many of my constituents and by the parish councils, is that the proposed new lines should pass underground through the area around South Cave, Ellerker, and Broomfleet – and indeed wherever else an underground cable is possible, including where the pylons run alongside major settlements such as Skidby – to avoid a dramatic loss of visual amenity and the feeling of encirclement by large pylons.

In line with data protection regulations, this office processes personal data under the lawful basis of public task. Further details on how the office handles personal data can be found by viewing the Privacy Notice at: www.daviddavismp.com/privacy-notice/. If you require a paper copy of the Privacy Notice please contact my office.

I understand that underground lines are associated with higher installation costs, but the importance of maintaining visual amenity and local support is surely worth some additional financial cost. It should also be noted that overhead lines themselves come with financial and social costs, including noise, maintenance and associated traffic, decreased reliability, the need for access routes, and energy losses.

The National Grid operates around 1,450 kilometres of underground cabling, approximately 20 percent of its transmission lines. In comparison, only a short section of the North Humber to High Marnham line would need to run underground to avoid a dramatic impact on the villages in question.

Residents have also expressed to me that their priority is not for cheaper electricity if the proposals are accepted, but to maintain the visual amenity of their area. Their strong preference is for the cables to be routed underground, and any discussion of compensation through lower electricity bills, while it would be welcome if the project goes ahead, must not distract from that strong preference to avoid overhead lines altogether.

Where overhead lines are unavoidable, the priority should be ensuring that no settlement is surrounded by two sets of overhead lines and pylons.

Through its Visual Impact Provision project, which Ofgem has put £465 million of funding towards, and which also contains a Landscape Enhancement Initiative, National Grid is currently working to remove overhead lines in Areas of Outstanding Natural Beauty and National Parks. It would be reasonable to extend this ambition to run a short stretch of cable in East Yorkshire underground to avoid encircling small villages. It seems counterintuitive that, at a time when National Grid is working to improve the visual impact of pylons across the UK, it is imposing new pylons on a picturesque area of East Yorkshire.

The landscape and habitat through which the transmission line will pass is highly regarded and contains several protected areas and other sites of interest. The area is a key part of the Yorkshire Wolds and Natural England is intending to designate a part of the Yorkshire Wolds as an Area of Outstanding Natural Beauty, subject to further consultation later this year. The Yorkshire Wolds is also designated as an Important Landscape Area in East Riding of Yorkshire Council's Local Plan. The emerging preferred corridor also runs alongside a number of conservation areas whose character would be altered by the addition of new pylons, as well as well as close to sites of Sites of Special Scientific Interest.

The wider Humber region is also part of the UNESCO East Atlantic highway, a migratory route for birds over Western Europe, and there are concerns that the lines could become an ecological trap for migrating birds. The East Coast Wetlands, including the Humber estuary, is also one of seven sites around the UK being backed by the Government to win World Heritage Status from UNESCO.

Moreover, the Wolds Way National Trail, which passes through some of the most tranquil and idyllic sections of English countryside, would have yet another electrical transmission line and row of pylons pass over it, with significant impacts on the visual character of the 80-mile walking route. It is important to take account of the abiding importance of maintaining such a highly regarded landscape and habitat in its present form.

In addition to the landscape and visual impact, several other concerns with this project have been raised with me. Many residents are justifiably concerned with the potentially significant impact on property prices from additional pylons. The emerging preferred corridor runs much closer to the Mount Airey Airfield than the existing line and it would be helpful to know what assessment has been made of the increased danger to pilots, primarily using low-flying light aircraft, that will result from the extra pylons.

I am also concerned that the National Grid is urging the Government to finalise a National Policy Statement that would effectively mandate the Planning Inspectorate to approve the proposals and would shorten the seven-year process to just three and a half years. This would be an unnecessary shortening of consultation time for what are undeniably very complex projects, would remove any opportunity to effectively contest this proposal, and would allow residents' dissenting views to be more easily disregarded. It would also make any judicial review of the project far more difficult to undertake.

I look forward to hearing from you.

Yours sincerely,

[redacted]

Rt. Hon. David Davis MP

Yorkshire Wildlife Trust

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Yorkshire Wildlife Trust is a company limited by guarantee. Registered in England No. 409650 and is a registered charity No. 210807

31/07/2023

BY EMAIL ONLY: contact@nh-hm.nationalgrid.com

North Humber to High Marnham - new high voltage overhead electricity transmission line

We are aware that the North Humber to High Marham project is just one part of National Grids' wider ambition to upgrade and reinforce the high-voltage power network across the UK, with multiple projects currently being rolled out for consultation across the country as part of the Great Grid Upgrade.

We note that we have not received any formal consultation from National Grid about this project despite a significant portion lying within Yorkshire, and request that we are included in any future consultation. We are discussion with Lincolnshire Wildlife Trust, Nottinghamshire Wildlife Trust and the RSPB regarding potential impacts and are supportive of their positions on the project.

Cumulative Impacts

The Royal Society of Wildlife Trusts (RSWT – the Wildlife trusts umbrella organisation) have previously held conversations with National Grid, and we support their request for all of the work related to upgrading the power network to be considered as a single project and cumulative impacts upon ecologically sensitive and biodiverse sites to be fully taken into account, as would be expected as standard practice for any Nationally Significant Infrastructure Projects (NSIP). Our comments therefore relate to local considerations. Whilst the information available at the current time is high level, we would like to make the following comments:

Statutory and Non- Statutory Designated Sites

The mitigation hierarchy must be applied in any route design, and the key consideration is the presence of statutory and non-statutory designated sites, and the avoidance of impacts on these sites. Whilst Yorkshire Wildlife Trust Reserves do not appear to be directly affected by the route (which runs to the south of our North Cave Reserve), we are supportive of other Wildlife Trusts in highlighting potential damaging impacts on their reserves.

We draw particular attention to Local Wildlife Sites (LWS), due to their non-statutory protection, which can leave them particularly vulnerable to impacts.

LWS (formerly known as Sites of Importance for Nature Conservation) are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature's

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recovery. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites – improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature's recovery.

In circumstances where applications which impact upon LWS are approved because of 'over-riding need', then robust mitigation and compensation **must** be incorporated. National Grid must provide a detailed inventory of Local Wildlife Sites potentially impacted by the project, and a detailed description of the potential impacts. Please also provide the layers for the proposed route corridor in GIS Shape file format to allow us to scrutinise the route further.

It is essential that National Grid indicate how the project will avoid impacts on Wildlife Trust Reserves, statutory and non-statutory sites through micro-siting. Mitigation and compensation will need to be provided for any impacts which have not been avoided through the iterative design process.

Lowland Peat

The project cuts through the Humberhead Levels peatlands, the most concentrated area of lowland peat in the country. The Humberhead Levels spans the key areas of the inner section of the River Humber and the mosaic of sites that cluster around the Humberhead Levels National Nature Reserve (NNR), and straddles the boundaries of Yorkshire, Lincolnshire and Nottinghamshire.

The Humberhead Levels Partnership (of which Yorkshire Wildlife Trust plays an active part) is a collaboration of organisations working together to enhance habitat and increase connectivity across this region. A Nature for Climate Peatland Restoration Grant is being used undertake survey and monitoring work of lowland peat in Thorne and Hatfield Moors National Nature Reserve to guide future restoration work.

Impacts to peat will need to be fully assessed as part of the project and when seeking to deliver Biodiversity Net Gain (BNG - see below), the Humberhead Levels would be the most appropriate area to direct funding.



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Grasslands and Pollinators

Grasslands for Pollinators was a project based on the B-lines initiative mapping project (Buglife) and project sites may lie within the scheme area. Any impacts on these grasslands must be identified and avoided, and if unavoidable then mitigated and compensation. Through BNG, there is the potential to further enhance grasslands for pollinators in the project area.

Potential Bird Strike Risk

Whilst we understand that there are existing overhead lines along much of the routes, we may wish to comment further on the potential risk of bird strike with the overhead lines. The area of most concern is the crossing of the Ouse (just west of Blacktoft) - the importance of this location as a migratory route, particularly for wildfowl and waders should be fully established. The importance of this area is highlighted not only by the numerous designations but also by the consideration of the East Atlantic Flyway migratory route as a UNESCO world heritage site.

The potential for bird strike should be fully explored as part of the Environmental Impact Assessment and Habitats Regulations Assessment. We would advise that the applicant seeks out date on the number of strikes, particularly on waterfowl and waders which are the species most likely to be impacted. Any impact of land functionally linked to the Humber Estuary Special Protection Area (SPA) will need to be fully explored.

Please ensure that the RSPB are fully consulted on the proposals.

Biodiversity Net Gain

A completed Defra v4.0 metric should be submitted for scrutiny, along with the required supplementary documentation to illustrate that the ten good practice principles for Biodiversity Net Gain have been applied. Template documents are available at https://cieem.net/resource/biodiversity-net-gain-report-and-audit-templates/.

The metric calculations should include all construction compounds and working areas where appropriate. The loss of habitats within Local Wildlife Sites should be assigned the appropriate 'Strategic significance' category, and it should be noted that it is not possible to account of losses or irreplaceable habitat within the metric.

One of The Wildlife Trusts' strategic aims is to make it normal practice for all residential, commercial and infrastructure development to contribute positively to nature's recovery on land and at sea. Biodiversity Net Gain, implemented in the right way, is therefore an important mechanism to help achieve The Wildlife Trusts' ambition.

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National Grid should be seeking to achieve a minimum of 10% Biodiversity Net Gain through this project. As detailed above, the peat restoration projects associated with the Humberhead Levels would be the most appropriate mechanism to delivery BNG.

Working Methods
Please note that where trenchless technology is proposed, this is not without ecological impacts and working areas such as thrusting and receiving pits must be located well outside any sensitive areas.

If 24 hour working is proposed, the potential impacts on nocturnal wildlife must be fully accounted for in the Ecological Impact Assessment.

We have expectations about minimum standards required during the works, which would include (but is not restricted to) the following:

- A full time Ecological Clerk of Works (ECoW).
- Rigorous ecological assessment of any yards, lay down areas , compounds and access routes which are determined after consent has been granted.
- Updating ecological surveys to be undertaken in accordance with best practice guidelines, and appropriate walkthrough surveys undertaken prior to works in particular areas, where required e.g. badger sett walkover surveys.
- All environmental issues including protected species risks, watercourses etc. to be appropriately fenced and signposted.
- The use of trackway/bog matting to protect sensitive habitats.
- A detailed Construction Environmental Method Statement.

I trust these comments are helpful. Please get in touch if you require any clarification.

Kind regards,

The Planning Team
Yorkshire Wildlife Trust
Email: planning@ywt.org.uk

ywt.org.uk
Yorkshire Wildlife Trust is the only charity entirely dedicated to conserving, protecting and enhancing Yorkshire's wildlife and wild places

From: clerk@southleverton-pc.gov.uk
To: North Humber to High Marnham
Subject: RE: EN020034 - North Humber to High Marnham - EIA Scoping Notification and Consultation
Date: 04 September 2023 15:07:32
Attachments: [redacted]

Good Afternoon,

The Parish Council responds as follows:

"South Leverton Parish Council feedback on National Grid Electricity Transmission project - North Humber to High Marnham.

We are aware residents of South Leverton are concerned about the project. The main issues raised are:

- *Proximity to the village*
- *Visual impact, the proposed swathe going on top of windmill - local landmark*
- *Disturbance of the construction, maintenance and upkeep of pylons*
- *Access roads unsuitable for heavy vehicles, many weak bridges above tributaries leading to the Trent*
- *The local wildlife and environment with multiple areas of conservation around the proposed swath*
- *The existing pylon corridors / routes East of the village not being looked at Health concerns*
- *Reason for new grid lines with ongoing project of West Bruton Nuclear fusion and solar projects nearby."*

Kind Regards,

South Leverton Parish Council

Confidentiality and Disclaimer
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From: [redacted]
To: North Humber to High Marnham
Subject: RE: EN020034 - North Humber to High Marnham - EIA Scoping Notification and Consultation
Date: 30 August 2023 15:57:59
Attachments: [redacted]

Good afternoon
Further to your email below, thank you for consulting South Yorkshire Mayoral Combined Authority regarding the EIA scoping consultation.
I can confirm that we have no comment to make at this stage. Please note that these comments represent the views of officers and do not represent the formal views of SYMCA unless this is specifically stated.
I would also be grateful if you could update your contact details for us, and direct any future email correspondence to the Planning team at SYMCA.Planning@southyorkshire-ca.gov.uk
Regards

[redacted]
Senior Development Manager - Development & Planning

T: [redacted]
E: [redacted]
www.southyorkshire-ca.gov.uk
South Yorkshire Mayoral Combined Authority Executive
11 Broad Street West, Sheffield, S1 2BQ

The Coal Authority
Resolving the impacts of mining

200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG
T: 01623 637 119
E: planningconsultation@coal.gov.uk
www.gov.uk/coalauthority

For the attention of The Planning Inspectorate

[By email: northhumbertohighmarnham@planninginspectorate.gov.uk.]

31 August 2023

Dear Sir/Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) - Regulations 10 and 11 Application by National Grid Electricity Transmission (the Applicant) for an Order granting Development Consent for the North Humber to High Marnham project (the Proposed Development)

Scoping consultation and notification of the Applicants contact details and duty to make available information to the Applicant if requested

Thank you for your notification of 23 August 2023 seeking the views of the Coal Authority on the above.

I have checked the site location plan against our coal mining information and can confirm that, whilst the proposed development site falls within the coalfield, it is located outside the Development High Risk Area as defined by the Coal Authority.

On this basis, the Planning team at the Coal Authority have no comments to make.

Please do not hesitate to contact us if you would like to discuss this matter further.

Yours faithfully

The Coal Authority Planning Team

Disclaimer

The above consultation response is provided by The Coal Authority as a Statutory Consultee and is based upon the latest available data on the date of the response, and electronic consultation records held by The Coal Authority since 1 April 2013. The comments made are also based upon only the information provided to The Coal Authority by the Local Planning Authority and/or has been published on the Council's website for consultation purposes in relation to this specific planning application. The views and conclusions contained in this response may be subject to review and amendment by The Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the Local Planning Authority or the Applicant for consultation purposes.

UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN020034
Our Ref: 64244

[redacted]
Senior EIA Advisor
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

18th September 2023

Dear [redacted]

Nationally Significant Infrastructure Project
North Humber to High Marnham - EN020034
Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following specific comments and recommendations:

Environmental Public Health

We recognise the promoter's proposal to include a health section. We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an Environmental Statement (ES), we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*', setting out aspects to be addressed within the Environmental Statement[1]. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Air Quality

We note that at this point, an air quality assessment has not yet been undertaken. Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold, i.e., an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

EMF sources

UKHSA requests that the ES includes an assessment of the possible EMF public health impact, to be carried out in line with the following code of practice - Demonstrating compliance with EMF public exposure guideline[1]. The proposer should confirm either that the proposed development does not impact any receptors from potential sources of EMF; or ensure that an adequate assessment of the possible impacts is undertaken and included in the ES.

---

1 https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658

Human Health and Wellbeing

This section of OHIDs response, identifies the wider determinants of health and wellbeing we expect the ES to address, to demonstrate whether they are likely to give rise to significant effects. OHID has focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are:

- Access
- Traffic and Transport
- Socioeconomic
- Land Use

Having considered the submitted Scoping Report OHID wish to make the following specific comments and recommendations.

Physical activity and active travel / access to open space

The report identifies significant potential impact through the temporary loss or change in formal Public Rights of Way (PRoW), the existing road network and national cycle networks. Physical activity forms an important part in helping to promote healthy weight environments and as such it is important that any changes have a positive long-term impact where possible.

The report does not identify how the frequency of use for these routes will be determined. The determination of sensitivity and magnitude must include reference to the usage of each PRoW, bridleway or cycle route. In addition to public authority consultation, usage insights can also be gained through community consultation and site surveys.

Recommendations

Local consultation with the community and a site survey of the routes directly affect should indicate likely usage levels. This data should be used to review the allocation of sensitivity, magnitude and final assessment of significance to each of the affected PRoW or cycle networks.

Traffic and Transport

The Traffic and Transport Study Area will primarily be based upon ‘Rule 1’ and ‘Rule 2’ of the IEMA Guidelines which can be used to determine the effect of increased traffic volumes on links within the Study Area. The latest version of the IEMA guidelines should be used to form the basis of the assessment.

Recommendations

The traffic and transport assessment should be completed in accordance with the latest IEMA Guidance - Environmental Assessment of Road Traffic and Movement[2].

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

[2] David, S, Hoare. D, Howard. R, Ross. A. (2023) Institute of Environmental Management and Assessment of Road Traffic and Movement

Appendix A
Late consultation responses

nationalgrid

[redacted]
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Yorkshire Water Services
Developer Services
Pre Development Team
PO Box 52
Bradford
BD3 7AY

Tel:
Fax:

Email:
planningconsultation@yorkshirewater.co.uk

For telephone enquiries ring:
[redacted]

Your Ref: EN020034
Our Ref: Z004350

22nd September 2023

Dear Sir/Madam,

Between Creyke Beck Substation Cottingham East Yorkshire to High Marham Substation Nottinghamshire - Application by National Grid Electricity Transmission for an Order granting Development Consent for North Humber to High Marham Project

Thank you for consulting Yorkshire Water (YW) regarding the above proposed development.

Water Environment

Matters relating to the water environment are scoped into the Environmental statement. YW support this. However, Table 10.1 of the EIA Scoping Report, Volume 1, ref: CGNC-NG-CNS-REP-0002 advises sewerage undertakers will not be consulted to agree the scope of the FRA. YW believe this to be an oversight and would request that pre-application discussions are held to ensure that YW critical assets are not adversely affected. Damage to YW assets as part of the construction process can result in pollution and/or flooding to end users. Consequently, proper consideration of the sewer and clean water network as part of the FRA is important. Any pre-application discussions should be supported by detailed route maps of the electricity transmission line.

The proposal is not expected to generate any discharge to YW assets. During construction, rainwater and water encountered during excavation, would be addressed by construction of sustainable drainage systems (SuDS). This is acceptable to Yorkshire Water

Noise and Vibration

Noise and Vibration is scoped into the ES. However, vibration impacts to structures has been scoped out of this chapter. YW assets are considered to be vibration sensitive structures. Notably, a steel 1000mm treated live water main crosses the scoping boundary between the settlements of Ellerker and Elloughton. The impact of construction activities on this asset must be taken into consideration. Clean water assets including: 14-inch cast iron water main and a 355mm HPPE water main follow the route of the A164 and must also be taken into consideration.

Geology and Hydrogeology

A small part of the identified scoping boundary passes through the separate SPZ1 areas of both Keldgate and Dunswell Source Protection Zones and the associated SPZ2 and SPZ3 zones for these protection areas. The EIA Scoping report Volume 1, ref: CGNC-NG-CNS-REP-0002 advises that majority of the geology and hydrogeology topic will be scoped out advising significant effects are unlikely with the proposed mitigation and control measures.

However, some elements of the geology and hydrogeology topic will be scoped in, including trenchless crossings. Trenchless crossing are not currently proposed although any significant effects on the SPZ zones as a result of intrusive ground works will be considered. The ES will also be supported by a CEMP detailing the use and storage of chemical and fuels. The scope of this chapter is acceptable to YW.

Conclusion

Overall, YW agrees with the scope of the EA but requires extension to Chapter 10. Water Environment and Chapter 15. Noise and Vibration as detailed above.

Yours faithfully

[redacted]nt and Planning Manager

Guildhall
Marshall's Yard
Gainsborough
Lincolnshire DN21 2NA
Telephone 01427 676676
Web www.west-lindsey.gov.uk

Your contact for this matter is:
[redacted]

The Planning Inspectorate
Environmental Services, Central Operations
Temple Quay House
2 The Square
Bristol BS1 6PN

Dear Sir/Madam,

APPLICATION REFERENCE NO: 147270

PROPOSAL: PINS consultation on behalf of the Secretary of State for its opinion (a scoping Opinion) as to the information to be provided in an Environmental Statement – EN020034

LOCATION: North Humber to High Marnham

Thank you for your letter dated 21st August 2023. This letter forms the response from West Lindsey District Council in its role as the Local Planning Authority. This letter will set out the response of the Local Planning Authority to the EIA Scoping Report which has been submitted. The proposal constitutes both EIA development for the purposes of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and a Nationally Significant Infrastructure Project (NSIP) and is regulated by The Planning Act 2008. This letter will set out the response from the Local Planning Authority based on the chapters in the Scoping Report. The project is entirely outside of the geographic boundary of West Lindsey by up to 3.5 kilometres. Therefore, where the Local Planning Authority has no comments to make, this will be indicated.

Chapter 1 – Introduction

There are no comments to make on this section. The introduction sets out the background context and the legislative framework which the proposed development would sit within.

Chapter 2 – Regulatory and Planning Policy Context

Although again, the relevance is limited, a full understanding of the legislative, policy and guidance is critical.

It is considered that the local policy context is severely lacking in detail. No consideration has been provided to the Central Lincolnshire Local Plan (adopted April 2023) at the outset and is only referenced sporadically throughout the Scoping Report and where it is mentioned, detail is lacking. Although not within the geographic area of West Lindsey, the nature and scale of the proposed development has the potential to have significant environmental effects of a transboundary nature. This is especially the case for impacts from a landscape, visual and heritage perspective. The flat topography and scale of the project means that it has the potential to be visible for several miles and therefore into jurisdiction of the West Lindsey

The whole Scoping Report makes two references to Neighbourhood Plans and no specific reference is made to any Neighbourhood Plan in any District/County, let alone specific policy within them. Neighbourhood Plans form part of the statutory development plan within their relevant geographic boundaries and therefore an appropriate level of weight should be afforded to them in the determining of this proposal. A lack of reference to specific policies is consistent throughout the Scoping Report.

Chapter 3 – Main Alternatives Considered

The approach here is agreed, it is positive to see that an outline of the alternatives considered has been provided at an early stage which is not always the case. It would be expected that a full justification is also set out within the final Environmental Statement (ES).

Chapter 4 & 5 – Description of the Project / EIA Approach & Methodology

The general approach to the overall project is considered to generally be acceptable. More clarity on the nature (if any) public consultation will take place would have been preferred. This project and the NSIP process in general are highly technical and interdisciplinary but the scale of the project and the rural context will likely raise questions and/or concerns within many communities who would want to be involved at an early stage. A lot of reference is made to cumulative impacts but it would have been preferable to see this in a standalone chapter.

Chapters 6 & 7 – Landscape & Visual

The scale of this project is very substantial and visual/landscape impacts given the flat topography could potentially impact the landscape character for miles around. Consideration should be given to Policy S53 which relates to design and amenity. It is positive to see that reference has been made to Policy S62. The lack of reference to any National Character Areas within West Lindsey is also of concern. For instance, National Character Area 22 around East Stockswith and Wildsworth comes within 1.5 kilometres of the Scoping Boundary and has been afforded no consideration. No reference appears to have been made to Section 12 of the NPPF relating to design.

More details should be provided with regard to the potential impact of the proposal on West Lindsey. At present, only one reference is made to scoping Areas of Great Landscape Value around Gainsborough. Whilst this is understood as these are predominantly on the eastern side of Gainsborough, more justification should be provided.

The approach to the LVIA not referencing National Character Areas (NCAs) and favouring Local Character Areas (LCA) is understood but the purpose of National Character Areas is to provide an overall picture of the character and appearance of an area at a larger scale. Given the nature and scale of the project, the lack of specific consideration to NCAs is concerning and it is the view of the Local Planning Authority that these should be **scoped in** to the final ES. The LVIA should also **scope in** the potential impacts (if any) on LCAs within West Lindsey. It is agreed that the Lincolnshire Wolds can be scoped out.

It is understood that the main focus would be on local/nationally protected landscapes but this should not be at the expense of the overall landscape character. The fact that Chapter 7 makes almost no reference to West Lindsey and no detailed consideration is surprising. The closest extent of the Scoping Boundary is just over 1 kilometre and goes up to being 3 kilometres from the western border of West Lindsey. The introduction to Chapter 7 outlines the following:

> *'Based on the type of OHL infrastructure and experience of assessments of 400 kV OHL (the tallest element of the Project), the visibility of individual pylons approximately 50 m tall is assumed to be a maximum distance of 10 km. Beyond this distance the perceptibility of pylons approximately 50 m tall diminishes considerably in most instances, and in all but the clearest of viewing conditions.*
>
> *At distances greater than 5 km, effects on landscape character and visual amenity are unlikely to be significant. This is because at 5 km distance, when viewed at arm's length, a 50 m tall pylon will appear to be approximately 0.61 cm high in the landscape. If a pylon is seen on the skyline in very clear conditions, or a pair of pylons are seen close together at this distance, perceptibility may increase slightly but this is still unlikely to trigger significant effects.*
>
> *Initial field survey for the Project has also determined that, where visible at distances between 1 km and 3 km, existing pylons are typically noticeable but not prominent. This is because in the rolling well-treed landscapes found north of the Humber Estuary, pylons are often obscured by trees, landform and vegetation, whilst in the flat open landscapes south of the Humber Estuary, the visually permeable nature of the pylon's lattice structure means that they rapidly recede and visually assimilate into the wider landscape.'*

The text is taken from 7.3.2 to 7.3.4. Whilst the impacts are less likely to be significant on West Lindsey than other LPAs directly within the Scoping Boundary, the lack of any consideration is concerning. The first paragraph makes it clear that the study area is up to 10 kilometres and it is only at a distance of greater than 5 kilometres where the impacts are considered to be *'unlikely to be significant'.*

All relevant NCAs/LCAs within West Lindsey should be **scoped in** to the ES alongside consideration of all relevant development plan policies, including Neighbourhood Plans. This alongside Chapter 9 are the most important considerations to the Local Planning Authority and should be given an appropriate level of consideration.

<u>Chapter 8 – Ecology & Biodiversity</u>

There are no specific comments in this regard. There may important considerations during the construction period but beyond this, given the physical separation distance between

the project and West Lindsey, significant environmental effects seem unlikely at a distance of beyond 1 kilometre.

Chapter 9 – Heritage

No reference has been made to Policy S57 of the Central Lincolnshire Local Plan. Although the impact on the setting of any designated/non-designated heritage assets within the District is less likely, the Local Planning Authority would at a minimum expect a proportionate assessment of the impact on their setting and significance to be undertaken. there are a number of Grade II Listed Buildings in Torksey, Gainsborough, Wildsworth and East Stockswith, all of which are near the River Trent and should be considered as part of the EIA. Again, a proportionate assessment on their setting and significance would be expected given the significant scale of the project and the potential to introduce a prominent feature on the landscape for at least 80 years. The scale of the project would be the equivalent to a building 10-20 storeys in height. .

Chapters 10, 11 & 12 – Water Environment / Geology and Hydrogeology / Agriculture and Soils

Given the separation distance of the project from West Lindsey, there are no comments to make in this regard.

Chapter 13 – Traffic and Transport

The general approach to measuring risk is generally agreed with. The approach to selecting which development plans/policies to assess is again somewhat confusing. No reference has been made to the Central Lincolnshire Local Plan. The idea that a decline in highway safety has been **scoped out** given the scale of the project is concerning. The ES should also include details of construction traffic intensity and routing as this could have the potential to cause serious localised issues. The relevant development plan policy in the Central Lincolnshire Local Plan is Policy S47. Although this would only be applicable if construction traffic is to be routed through Central Lincolnshire.

Chapter 14 – Air Quality

It is anticipated that the main impacts would be during the construction period. Full consideration should be given in the ES to any transboundary impacts that result from transport emissions, ground works/disturbance or anything that causes the release of dust and particulate matter into the air. No reference is made to the potential impact (should one exist) on West Lindsey and no policies have been referenced. Transboundary effects should be **scoped in** to the final ES.

Chapters 15, 16 & 17 – Noise and Vibration / Socio-economics, Recreation and Tourism / Health and Wellbeing

There are generally no comments in this regard. Tourism is a significant element of the economy within West Lindsey contributing over £143 million in 2019. However, apart from the potential exception of the construction period, significant impacts in this regard seem unlikely.

Chapters 18 &19 – Climate Change / Major Accidents & Hazards

The approach in these chapters is generally agreed. The fact that more consideration has not been given to potential hazards and accidents during the construction period at this stage is somewhat concerning.

Conclusion

This letter forms the basis of the response of the West Lindsey District Council in its role as the Local Planning Authority to the Scoping Report to the aforementioned NSIP proposal for the development of a 400 kilovolt electricity transmission cable from North Humber to High Marnham.

Should you have any questions or queries about the contents of this letter, please do not hesitate to contact myself.

Yours faithfully,

[redacted]

Senior Development Management Officer
On behalf of West Lindsey District Council

If you want to know more about how we use your data, what your rights are and how to contact us if you have any concerns, please read our privacy notice:
www.west-lindsey.gov.uk/planning-privacy

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Dear Sir/ Madam,

Please find below a response from some of the Broomfleet residents regarding the EIA scoping sent via The Broomfleet Parish Council.

Broomfleet village would like to ensure that their concerns are being taken into consideration during all stages of the planning process. The following impacts which will need addressing were discussed at a recent village meeting with regards to the proposed proximity of the additional National Grid pylons.

The landscape and habitat through which the possible transmission line will pass is highly regarded and contains several protected areas and other sites of historic interest.

The area is a key part of the Yorkshire Wolds and Natural England is intending to designate part of this as an area of AONB.

The emerging preferred corridor also runs alongside a number of conservation areas whose character would be altered significantly by the addition of new pylons, in conflict with Holford rule number 6 which states in flat, sparsely planted areas like the Humberhead levels National Charter Area (NCA), there is a need to avoid a concentration of wires creating a 'WIRESCAPE'

Dramatic negative impact on visual amenity of this area of the Yorkshire Wolds. The additional pylons would be a jarring intrusion marring the unspoiled charm of this beautiful green space, with an industrial corridor of steel.

The whole section of corridor, especially Broomfleet, should be underground, extreme North or <u>better still</u> off shore via an integrated grid.

We are concerned that National Grid is urging the Government to finalise a National Policy statement that would effectively mandate the Planning Inspectorate to approve the proposals and would shorten the 7 year consultation process to 3.5 years. We see this as unacceptable and effectively tipping the balance to allow National Grid to more easily disregard residents' dissenting views and make any judicial review of the project far more difficult to undertake.

<u>Potential Impacts/Concerns raised by the villagers at a Public meeting held in July 2023</u>

- **Migration of birds**
  - The Humber region is also part of the UNESCO East Atlantic highway, a primary migration route for birds over Western Europe and there are concerns that the lines could become an ecological trap for migrating birds.
  - The East Coast Wetland, including the Humber Estuary is also one of the seven sites around the UK being backed by the Government to win World Heritage Status from UNESCO.
  - The UNESCO Flyway is a coastal network of wetlands from RSPB Blacktoft Sands on the Humber Estuary to RSPB Wallasea Island, Essex. It is visited by millions of birds annually. World Heritage are in the process of making the Humber a World Heritage Site - this has been put forward by the government
  - Farmers are given funds for feed and hedges to support the migration
  - Bird casualties - due to cables in the flight path, at present geese & swans often fly into the cables. Doubling the number of cable plus the new cables would be thicker and the possible emitting a higher magnetic field - could impact the flight path casualties further
- **Water Levels**
  - Land searches show that the area around Broomfleet is a flood plain with links to Market Weighton Canal through watercourses and dykes
  - Fields are used as water soaks
  - Possible impacts of flooding in the village due to climate change if flood plains & water soaks are compromised
- **Impact on nature**
  - Local bird life, birds of prey, owls, geese, swans, deer etc could all be materially impacted
  - Natural England is intending to designate part of this as an area of AONB.

        - Negative impact on wildlife - local bird life such as Marsh Harriers, Red Kites and the thousands of migrating geese to name but a few.
- **Historic area of interest**
    - Roman area of historical interest
    - Provence Farm was once a hamlet, and artefacts have been found around both it and Providence Farm, one of which dates back to Roman times and held the museum in Hull
- **House Prices**
- This may have an impact on house prices in the area
- Saleability of property may reduce
- **Pennine Trail/visitors to the area**
    - Impact to walkers & cyclists - both visually & the road/path infrastructure
    - Government green book states the impact on the environment needs to be minimised - alternate such as offshore routes should be evaluated
- **Possible Health Issues**
    - If overhead pylons go ahead the cables will be thicker and possibly increasing the EMF
    - Possible negative impact on health due to an increased EMF - there is growing evidence of adverse effects of EMF on health.
    - Surrounding the village or running further pylons in close parallel proximity would further increase the level of EMF on the village and therefore increase the risk of adverse health issues.
    - No current/recent government studies on the effect on the community from EMF
    - The last EMF study was completed in 2013, an up to date study is required of current EMF levels in village - the village needs to lobby MP David Davis to ensure this study is completed before any further changes are made
    - Independent studies have been conducted in Italy and other countries similar concerns around the impact of EMF and child leukaemia
    - **Consider the Question:** Do we believe we have disproportionate health issues in the village caused by EMF and would the increase put us under further risk?
- **Disruption** (both during construction and longer term)
    - Farms and businesses for the whole of the proposed line not just Broomfleet could cause a detrimental effect on quantities of crops grown during this time could feed into impact prices across the food chain
    - **Infrastructure impact during the construction phase**
        - Level of traffic increase on roads which are single track
        - Traffic has already increased with National Grid assessing pylons - issue with limited passing places
        - Roads are used by farmers, walkers, cyclists, runners and the movement of sheep
- <u>Other Considerations</u>

Underground Cables - the unanimous preference expressed was that if transmission lines had to come close to the village and surrounding settlements, there they should be underground to help safeguard the visual amenity of the surrounding countryside

It was felt that the National Grid ESO report on the benefits of a coordinated integrated offshore grid to transmit the North Sea wind-farm energy south the area of demand should be further explored as a priority to avoid the destruction of the local landscape with archaic and visually impactful additional pylons.

Regards
Broomfleet Village Representatives

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