The Great Grid Upgrade

North Humber to High Marnham

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# North Humber to High Marnham

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nationalgrid

# Contents


**1. Introduction 1**

1.1 Overview 1

**2. Policy Compliance Tables 2**

2.1 National Policy Statement for Energy (EN-1) 2
2.2 National Policy Statement for electricity networks infrastructure (EN-5) 89
2.3 East Inshore Marine Plan 106
2.4 National Planning Policy Framework (NPPF) 119
2.5 East Riding of Yorkshire Council Local Plan Update (2025) 140
2.6 North Lincolnshire Council Core Strategy (2011) 161
2.7 North Lincolnshire Local Plan (2003) 174
2.8 Bassetlaw Local Plan (2024) 186
2.9 East Riding of Yorkshire and Kingston upon Hull Joint Minerals Local Plan (2019) 203
2.10 Nottinghamshire Minerals Local Plan 204
2.11 Nottinghamshire and Nottingham Waste Local Plan (2025) 204
2.12 Cottingham Neighbourhood Plan (2018) 206
2.13 Clarborough and Welham Neighbourhood Plan (2017) 209
2.14 Headon, Upton, Grove and Stokeham Neighbourhood Plan (2018) 211
2.15 Rampton and Woodbeck Neighbourhood Plan (2021) 213
2.16 Treswell with Cottam Neighbourhood Plan (2024) 214
2.17 Misterton Neighbourhood Plan (2024) 216
2.18 Walkeringham Neighbourhood Plan (2021) 220
2.19 Sturton Ward Neighbourhood Plan 222
2.20 East Drayton Neighbourhood Plan (2026) 228

**3. References 234**

Table 1.1 – Signposting for Compliance with EN-1 2
Table 1.2 – Signposting for Compliance with EN-5 89
Table 1.3 – Signposting for Compliance with the East Inshore Marine Plan 106
Table 1.4 – Signposting for Compliance with NPPF (Updated February 2025) 119
Table 1.5 – Signposting for Compliance with the East Riding of Yorkshire Council Local Plan Update (2025) 140
Table 1.6 – Signposting for Compliance with the North Lincolnshire Council Core Strategy (NLCCS) (2011) 161
Table 1.7 – Signposting for Compliance with the North Lincolnshire Local Plan (2003) 174
Table 1.8 – Signposting for Compliance with the Bassetlaw Local Plan (2024) 186
Table 1.9 – Signposting for Compliance with the East Riding of Yorkshire and Kingston upon Hull Joint Minerals Local Plan (2019) 203
Table 1.10 – Signposting for Compliance with Nottinghamshire Minerals Local Plan (N-MLP) (2021) 204

Table 1.11 – Signposting for Compliance with the Nottinghamshire and Nottingham Waste Local Plan (2025) 204
Table 1.12 – Signposting for Compliance with the Cottingham Neighbourhood Plan C-NP (2018) 206
Table 1.13 – Signposting for Compliance with then Clarborough and Welham Neighbourhood Plan (2017) 209
Table 1.14 – Signposting for Compliance with the Headon, Upton, Grove and Stokeham Neighbourhood Plan (2018) 211
Table 1.15 – Signposting for Compliance with the Rampton and Woodbeck Neighbourhood Plan (2021) 213
Table 1.16 – Signposting for Compliance with the Treswell with Cottam Neighbourhood Plan (2024) 214
Table 1.17 – Signposting for Compliance with the Misterton Neighbourhood Plan (2024) 216
Table 1.18 – Signposting for Compliance with the Walkeringham Neighbourhood Plan (2021) 220
Table 1.19 – Signposting for Compliance with the Sturton Ward Neighbourhood Plan 222
Table 1.20 – Signposting for Compliance with the East Drayton Neighbourhood Plan (2026) 228

# 1. Introduction

## 1.1 Overview

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

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

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

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

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

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

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

# 2. Policy Compliance Tables

## 2.1 National Policy Statement for Energy (EN-1)

Table 2.1 – Signposting for Compliance with EN-1

| Para | NPS EN-1 Policy Requirement | |
|---|---|---|
| 1.1.1 | This National Policy Statement (NPS) sets out national policy for the energy infrastructure described in Section 1.3 below. | This accordance table and section 6 of the **Application Document 5.5 Planning Statement** conclude compliance with NPS EN-1 and NPS EN-5 and demonstrate that the Project will not result in adverse impacts that outweigh its benefits. The extent and nature of the residual impacts do not trigger the exceptions set out in national policy to refuse consent with the presumption firmly engaged in favour of granting development consent.<br>National Grid considers there to be no evidence to suggest that the granting of the DCO for the Project would lead to the UK being in breach of any of its international obligations, any statutory duty that applies to the SoS, result in adverse impacts which outweigh the benefits, or be contrary to regulations about how its decisions are to be taken. |
| 1.1.2 | It has effect for the decisions by the Secretary of State on applications for energy developments that are nationally significant under the Planning Act 2008. For such applications this NPS, combined with any technology specific energy NPS where relevant, provides the primary policy for decisions by the Secretary of State. | |
| 1.1.4 | The Planning Act 2008 also requires that, where an NPS has effect, the Secretary of State must decide an application for energy infrastructure in accordance with the relevant NPSs except to the extent the Secretary of State is satisfied that to do so would:<br>• Lead to the UK being in breach of its international obligations;<br>• Be in breach of any statutory duty that applies to the Secretary of State;<br>• Be unlawful;<br>• Result in adverse impacts from the development outweighing the benefits;<br>• Be contrary to regulations about how its decisions are to be taken. | |
| **Government policy on energy and energy infrastructure development** | | |
| **2.2 Clean Power 2030 and net zero by 2050** | | |
| 2.2.5 | In October 2021 the government published the Net Zero Strategy. This set out our vision for transitioning to a net zero economy and the policies and proposals for decarbonising all sectors of the UK economy to meet our net zero target by 2050, making the most of new growth and employment opportunities across the UK. | **Application Document 5.5 Planning Statement** and **Application Document 7.17 Strategic Options Report Including Needs Case** sets out that the Project, if consented, would support the UK's net zero target by reinforcing the electricity transmission network between the North of England and the Midlands and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The Project would help meet future energy requirements and support the transition to a net zero economy. |
| **2.3 Meeting Clean Power 2030 and net zero** | | |
| 2.3.1 | Making Britain a Clean Energy Superpower is one of the five missions set out by the UK government. The Clean Power 2030 Action Plan sets out the government's first major steps towards delivering our Clean Power 2030 Mission in partnership with the Scottish and Welsh governments, industry and the public. | **Application Document 5.5 Planning Statement** and **Application Document 7.17 Strategic Options Report Including Needs Case** show that the Project, if consented, would support the Clean Power 2030 Action Plan by reinforcing the electricity transmission network between the North of England and the Midlands and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The Project would help meet future energy requirements and support the transition to a net zero economy. |
| 2.3.3 | Our objectives for meeting the Clean Power 2030 Mission are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050. This includes through delivery of our carbon budgets and Nationally Determined Contribution. | **Application Document 7.17 Strategic Options Report Including Needs Case** and section 3 of **Application Document 5.5 Planning Statement** explain that the Project is one of the essential network reinforcements needed to deliver the UK's net zero target and the Clean Power 2030 mission. The reinforcement will also support security and reliability of supply, in accordance with |

| Para | NPS EN-1 Policy Requirement | |
|---|---|---|
| 2.3.4 | Meeting the Clean Power 2030 Mission objectives necessitates a significant investment in new energy infrastructure, both large nationally significant developments and smaller-scale developments determined at a local level. This requirement for new energy infrastructure will present opportunities for the UK and contributes towards the creation of secure, well-paid jobs in the UK's clean energy industry and building domestic supply chains. | paragraph 2.3.3. Without reinforcement, the capacity of the existing network is insufficient to accommodate the connection of proposed new power sources connecting in the area. The Project will provide the urgently needed reinforcement to the transmission system in the Humber and East Midlands areas, helping to deliver 50 GW of offshore wind by 2030 and ultimately contributing towards achieving net zero.<br>The wider socio-economic benefits of the Project are set out in **Application Document 6.17 Environmental Statement Chapter 17 Socioeconomics, Recreation and Tourism**. The Project will support, on average, 284 total net jobs per annum during the construction period. Of these, 57 jobs per annum will be expected to be taken up by residents in the study area. In addition, it is estimated that construction will contribute approximately £39.9 million to the national economy, of which £8 million would likely be within the 60-minute drive-time catchment area.<br>This Project will therefore contribute to the creation of jobs and training opportunities in the UK's clean energy industry. |
| 2.3.5 | As set out in the Clean Power Action Plan, this will be driven through rapid deployment of low carbon generation, flexibility infrastructure, and electricity transmission infrastructure. The Action Plan sets out targets for the 2030 capacities of key technologies at a national and regional level | |
| **2.5 Sustainable Development** | | |
| 2.5.6 | Whatever incentives, rules or other signals developers are responding to, the government believes that the NPSs set out planning policies which both respect the principles of sustainable development and can facilitate, for the foreseeable future, the consenting of energy infrastructure on the scale and of the kinds necessary to help us maintain safe, secure, affordable and low carbon supplies of energy. | The reinforcement provided by the Project to ensure sufficient infrastructure to support the transition to net zero and therefore the Project will support the government's objectives of maintaining safe, secure, affordable and low carbon supplies of energy in accordance with paragraph 2.5.6. |
| **The need for new nationally significant energy infrastructure projects** | | |
| **3.1 Introduction** | | |
| 3.1.1 | This Part of the NPS explains why the government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the government considers that the need for such infrastructure is urgent. | National Grid notes that, in accordance with paragraph 3.1.1, the need for infrastructure such as the Project is established, it is urgent and substantial weight should be given to this need when considering this application for development consent. |
| 3.1.2 | However, it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. These effects will be minimised by the application of policy set out in Parts 4 and 5 of this NPS. See also Part 2 of each technology specific NPS. | It is recognised that there may be some significant residual impacts associated with large-scale energy infrastructure. The application is accompanied by an ES (**Application Documents 6.1 to 6.22**) which provides the final assessment of the likely significant effects associated with the Project during its construction and operation (including maintenance). Section 7 of **Application Document 5.5 Planning Statement** explains that the significant residual adverse impacts of the Project are limited. NPS EN-1 paragraph 4.2.28 states that '*Where residual non-HRA or non MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure*', or in other words, '*it is unlikely that consent will be refused on the basis of these residual impacts*' (Figure 2: Application of CNP in decisions relating to Environmental Impacts Assessments of NPS EN-1). As further set out in paragraph 4.2.28, the exceptions to this presumption of consent relates to circumstances in which residual effects would be present '*an unacceptable risk to, or unacceptable interference with*' human health and public safety, defence, irreplaceable habitats, the achievement of net zero, offshore navigation, and flood and coastal erosion risk. None of the exceptions to the presumption of consent set out in paragraph 4.2.15 apply. The presumption in favour of consent for CNP infrastructure is therefore not affected with regard to these exceptions. There are also no residual effects relating to a HRA or MCZ, therefore paragraph 4.2.29 of NPS EN-1, states that the Secretary of State will take as the starting point for decision-making that such infrastructure (CNP) '*is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances*'. |

| Para | NPS EN-1 Policy Requirement | |
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| **3.2 Secretary of State decision making** | | |
| 3.2.5 | The government's strategic framework includes the Clean Power 2030 Action Plan and the pathways to 2030, the Strategic Spatial Energy Plan, and the Centralised Strategic Network Plan. These should be considered by applicants, together with other relevant considerations, and used to inform developments of new energy infrastructure projects. | National Grid has had regard to the Clean Power 2030 Action Plan and the pathways to 2030, the Strategic Spatial Energy Plan, and the Centralised Strategic Network Plan during the design and development of the Project as set out in **Application Document 7.17 Strategic Options Report Including Needs Case**, **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study**, **Application Document 5.10 Design Approach Document** and **Application Document 5.9 Design Development Report**. |
| 3.2.8 | The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent, as described for each of them in this Part. | National Grid notes that, in accordance with this policy, the need for infrastructure such as the Project is already established. It is urgent and substantial weight should be given to this need when considering the application for development consent. **Application Document 7.17 Strategic Options Report Including Needs Case** and section 3 of **Application Document 5.5 Planning Statement** clearly set out the need for the Project. In accordance with s104 of the Planning Act 2008, the application will be determined in accordance with the NPS as primary policy for decision making and the NPS recognises that the need for the Project is demonstrated. |
| 3.2.9 | In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008. | |
| 3.2.10 | The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS. | |
| **3.3 The need for new nationally significant electricity infrastructure** | | |
| 3.3.3 | To ensure that there is sufficient electricity to meet demand, new electricity infrastructure will have to be built to replace output from retiring plants and to ensure we can meet increased demand. Our analysis suggests that even with major improvements in overall energy efficiency, and increased flexibility in the energy system, demand for electricity is likely to increase significantly over the coming years and could more than double by 2050 as large parts of transport, heating and industry decarbonise by switching from fossil fuels to low carbon electricity. The Impact Assessment for CB6 shows an illustrative range of 465-515TWh in 2035 and 610-800TWh in 2050. | As explained in the Strategic Options Report (**Application Document 7.17 Strategic Options Report Including Needs Case**) and in section 5 of the **Application Document 5.5 Planning Statement**, the Project will help to meet the demand for energy by increasing the capacity of the electricity network to carry low-carbon and renewable energy from where it is generated to homes and businesses across the country.<br>The Project will be a critical enabler of the clean energy transition by transferring energy around the country. However, the scale and pace of investment needed to meet the UK's decarbonisation targets are significant and urgent; for example, achieving the ambition of up to 50 GW offshore wind by 2030 requires industry to deliver over six times the amount of electricity transmission network infrastructure in the next eight years than has been built in the past 30 years.<br>The Project will provide the urgently needed reinforcement to the transmission system in the Humber and East Midlands. Without reinforcement, the capacity of the existing network in the Humber and East Midlands is insufficient to accommodate the connection of proposed new power sources connecting in the area. This reinforcement will ensure that, in accordance with national and local policies and targets, the Project will improve the existing electricity transmission network, and will contribute to energy independence, the UK's decarbonisation requirements and climate change targets, and assist in ensuring the supply of energy remains secure, reliable and affordable.<br>Paragraph 4.2.17 of NPS EN-1 confirms that the Project, directed into the NSIP regime under section 14(1)(b) and 16 of the Planning Act 2008, comprises CNP infrastructure. Section 9 of **Application Document 5.5 Planning Statement** summarises how the urgent need for CNP infrastructure to achieving energy objectives and other benefits outweighs the Project's residual impacts following the application of the mitigation hierarchy.<br>Regarding consideration of future demand, as explained in **Application Document 5.11 Interrelationship Document**, the Project has continuously coordinated and consulted with other relevant projects throughout the process of routeing, siting and design development.<br>A key consideration has been the extent to which coordination could be achieved through alignment with existing infrastructure corridors, including existing overhead line routes, and whether this could assist in minimising additional land take or disturbance. In practice, opportunities for co-location of infrastructure have been limited. However, consideration has been given to other forms of |
| 3.3.4 | There are several different types of electricity infrastructure that are needed to deliver our energy objectives. Additional generating plants, electricity storage, interconnectors and electricity networks all have a role, but none of them will enable us to meet these objectives in isolation. | |
| 3.3.16 | If demand for electricity doubles by 2050, we will need a fourfold increase in low carbon generation and significant expansion of the networks that transport power to where it is needed. In addition, we committed in the Clean Power 2030 Action Plan to clean sources producing at least 95% Great Britain's generation. This will set us well on the way to the commitment in the Net Zero Strategy to take action, whilst meeting a 40-60 per cent increase in electricity demand. This means that the majority of new generating capacity needs to be low carbon. | |
| 3.3.34 | In considering applications, applicants are expected to consider foreseeable future demand when considering the location and route of their investments. This may involve consenting offshore platforms, converter stations or substations which facilitate future coordination. | |
| 3.3.63 | Subject to any legal requirements, the urgent need for CNP infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, means that it is likely the need case will outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy, in all but the most | |

| Para | NPS EN-1 Policy Requirement | |
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| | exceptional circumstances. Government strongly supports the delivery of CNP infrastructure and it should be progressed as quickly as possible. | coordination between projects, including opportunities for shared or aligned use of temporary access arrangements where feasible, alignment of construction programmes where practicable and the potential to coordinate environmental mitigation measures in a manner that avoids unnecessary duplication and reduces cumulative effects**. Application Document 5.11 Interrelationship Document** sets out in detail these interrelationships between the Project and other relevant projects and the coordination proposed. |
| 3.3.65 | There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives. | It is evident that the Project is seeking to respond to the urgent need for new electricity network infrastructure and the programme for the Project's delivery seeks to achieve this at pace, whilst ensuring all required obligations are met. |
| 3.3.66 | The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security. The delivery of this important infrastructure also needs to balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts. | **Application Document 7.17 Strategic Options Report Including Needs Case** and **Application Document 5.5 Planning Statement** clearly set out the need for the Project. |
| 3.3.67 | The need to connect to new sources of electricity generation and new sources of demand is not the only driver for new electricity network infrastructure. As the electricity system grows in scale, dispersion, variety, and complexity, work will be needed to protect against the risk of large-scale supply interruptions in the absence of sufficiently robust electricity networks. While existing transmission and distribution networks must adapt and evolve to cope with this reality, development of new lines of 132kV (and over 2km) and above will also be necessary to preserve and guarantee the robust and reliable operation of the whole electricity system. | National Grid lies at the heart of a transforming energy system. National Grid plays a vital role in connecting millions of people to the energy they use, while continually seeking ways to make the energy system cleaner. National Grid owns and manages the national high-voltage electricity transmission system throughout England and Wales. National Grid owns, builds and maintains the infrastructure, overhead lines, buried cables and substations as a few examples, to allow power to move around the country. The key role of this transmission system is to connect the electricity generators' power stations with regional distribution network operators (DNOs) who then supply businesses and homes. In return for the connection, users of the transmission network pay a tariff to National Grid. The Project forms a part of the Great Grid Upgrade, which is the largest overhaul of the electricity grid in generations. The Project would establish a new 400 kilovolt (kV) transmission connection approximately 90 kilometres (km) in length between a new substation to be built in the vicinity of Birkhill Wood, located to the north of Hull near Creyke Beck in the East Riding of Yorkshire, and a new substation at High Marnham in Nottinghamshire. |
| 3.3.68 | The volume of onshore reinforcement works needed to meet decarbonisation targets is substantial. NESO forecasts that over the next decade the onshore and offshore transmission network, some of which is located offshore will require a doubling of north-south power transfer capacity due to increased wind generation in Scotland; substantial reinforcement in the Midlands to accommodate increased power flows from Scotland and the North of England; substantial reinforcement in London and the South of England to allow for Europe bound export of excess wind generation from Scotland and the North of England, as well as the importation of energy from Europe to increase resilience during any periods which may be affected by intermittent energy generation mix and as part of the country's transition to increased energy security; and substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation (this may also require additional offshore connections coming to land in England). | The **Application Document 5.5 Planning Statement** and **Application Document 7.17 Strategic Options Report Including Needs Case** explain that the Project is one of the essential network reinforcements needed to deliver the UK's net zero target and the Clean Power 2030 mission. They set out that the Project, if consented, would support the UK's net zero target by reinforcing the electricity transmission network between the North of England and the Midlands and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The Project would help meet future energy requirements and support the transition to a net zero economy. The reinforcement will also support security and reliability of supply. Without reinforcement, the capacity of the existing network is insufficient to accommodate the connection of proposed new power sources connecting in the area.<br>National Grid notes that the Project also intends to support the *'substantial reinforcement in the Midlands to accommodate increased power flows from Scotland and the North of England'*, as per paragraph 3.3.68. |
| 3.3.69 | It is important to note that the crucial national benefits of increased system robustness through new electricity network infrastructure projects are shared by all users of the system. | National Grid shares in this ambition, and through its operations is central to achieving it. The Project would involve reinforcing the electricity transmission network between the North of England and the Midlands and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The Project would help meet future energy requirements and support the transition to a net zero economy. The reinforcement will also support security and reliability of supply. Without reinforcement, the capacity |

| Para | NPS EN-1 Policy Requirement | |
|---|---|---|
| | | of the existing network is insufficient to accommodate the connection of proposed new power sources connecting in the area. |
| 3.3.70 | As all new grid projects have a role in efficiently constructing, operating and connecting low carbon infrastructure to the National Electricity Grid, the scope of networks CNP infrastructure is not limited to those associated specifically with a particular project. | Noted, the Project is Critical National Priority, as established in paragraph 4.2.17 of NPS EN-1, and it supports a number of generation projects, including offshore wind farms, being primarily a network reinforcement. |
| 3.3.71 | The historical approach to connecting offshore wind resulted in individual radial connections developed project-by-project. This may continue to be the most appropriate approach for some areas with single offshore wind projects that are not located in the vicinity of other offshore wind and / or offshore infrastructure that is planned or foreseen in the near future. For regions with multiple windfarms or offshore transmission projects it is expected that a more coordinated approach will be delivered. For these areas, this approach has the potential to reduce the network infrastructure costs as well as the cumulative environmental impacts and impacts on coastal communities by installing a smaller number of larger connections, each taking power from multiple windfarms instead of individual point-to-point connections for each windfarm. | The Project facilitates a more coordinated approach to transmission as it seeks to connect generation and transmission projects in the North Sea to the wider grid. The Project forms part of a wider co-ordinated approach to reinforcing the electricity transmission system being led by National Grid. For example, the northern end of the Project will connect onshore and offshore renewable energy sources in a planned and co-ordinated approach. The programme for the Project has been developed to provide a secure connection for new energy generation schemes being developed by third parties. |
| 3.3.72 | Connecting the volume of offshore wind capacity targeted by the government will require not only new offshore transmission infrastructure but also reinforcement to the onshore transmission network, to accommodate the increased power flows to regional demand centres. | The Project will reinforce the transmission system in the East Midlands and Humber regions of England. Without reinforcement, the capacity of the existing network is insufficient to accommodate the connection of proposed new power sources in the area, including offshore wind. This reinforcement will ensure that, in accordance with national and local policies and targets, the Project will improve the existing electricity transmission network, and will contribute to energy independence, the UK's decarbonisation requirements and climate change targets, and assist in ensuring the supply of energy remains secure, reliable and affordable. |
| 3.3.73 | Due to the time required to plan, approve and construct the required new onshore transmission infrastructure, to date the completion of these onshore reinforcements has often taken longer than the completion of the offshore wind farms for which they are being built. This could present a material barrier to the delivery of UK government ambition to accelerating the deployment of offshore wind to meet our Clean Power 2030 Mission. | |
| 3.3.74 | The strategic approach to network planning, including the Holistic Network Design (HND) for onshore-offshore transmission, its follow-up exercises and the forthcoming Centralised Strategic Network Plans, allows for clearer identification of needs and includes upfront consideration of environmental and community impacts. Government recognises the work undertaken in these strategic network planning exercises and these should be an important and relevant consideration in the consenting process. This recognition of the network designs seeks to directly support progress of projects identified within the designs as they are brought forward for consent. Further details are provided in Section 2.8 and 2.13 of EN-5. | The Holistic Network Design (HND) for onshore-offshore transmission, its follow-up exercises and the forthcoming Centralised Strategic Network Plans have been considered in the design of the Project, as set out in **Application Document 7.17 Strategic Options Report Including Needs Case**. |
| 3.3.80 | Further to the need case above, for projects not brought forward through a CSNP it is recognised that the case for a new connection or network reinforcement is demonstrated if the proposed development represents an efficient and economical means of:<br>• Connecting a new generating station or storage facility to the network;<br>• Reinforcing the network to accommodate such connections; or<br>• Reinforcing the network to ensure that it is sufficiently resilient and capacious (per any performance standards set by Ofgem) to reliably supply present and/or anticipated future levels of demand.<br>In considering the 'economic and efficient' approach the network project needs to follow good design, avoidance and mitigation principles (and / or biodiversity compensation where needed for transmission in the marine environment), as referenced in EN-5. | At multiple stages of the options appraisal process, National Grid has carried out assessments which consider the efficiency and the economic benefits of the Project. This process is set out in **Application Document 7.17 Strategic Options Report Including Needs Case**. This demonstrates that the Project is an efficient and economical means of reinforcing the network.<br>**Application Document 4.2 Funding Statement** explains how the Project generally is to be funded.<br>Section 6 of **Application Document 5.5 Planning Statement** provides an assessment of the Project against the '*criteria for good design for Energy Infrastructure*' contained in Part 4.7 of NPS EN-1.<br>The application is accompanied by an ES (**Application Documents 6.1 to 6.22**) which provides the final assessment of the likely significant effects, associated with the Project during its construction and operation (including maintenance), after the mitigation hierarchy has been applied. |

| Para | NPS EN-1 Policy Requirement | |
|---|---|---|
| 3.3.81 | Moreover, given the crucial role of networks in connecting all of the other kinds of electricity infrastructure described above, it is especially important that the Secretary of State considers network projects as elements of a coherent and strategically necessary system, whether or not they are linked together in specific NSIPs. For instance, when evaluating applications for new electricity networks infrastructure the Secretary of State should have regard to the fact that given:<br>i) The government's strategic commitment to more interconnection capacity and offshore wind generation; and<br>ii) The tightly interdependent infrastructure chain linking interconnection and offshore generation with onshore demand centres.<br>Delays in the approval of associated new network developments could cause significant economic waste and set back the strategically vital goals of decarbonisation and energy security. | While the Project does not involve generation, it is intrinsically linked to the success of forthcoming generation projects, particularly in relation to offshore wind, and as set out in response to 3.3.70 and 3.3.71, the Project proposes a coordinated approach to electricity transmission. Therefore, the Project cannot be considered without taking into account the benefits in terms of facilitating grid capacity for new generation projects. |
| 3.3.83 | The importance of accelerating coordination does not, however, militate against the need for standalone electricity networks projects, and these projects are supported by this NPS and should continue to be assessed on their own merits. | Noted. There is evident need for the Project in its own right to increase transmission capacity and upgrade the grid in the East Midlands and Humber areas. |
| 3.3.85 | Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy. | **Application Document 5.5 Planning Statement** and **Application Document 7.17 Strategic Options Report Including Needs Case** set out that the Project, if consented, would support the UK's net zero target by reinforcing the electricity transmission network between the North of England and the Midlands and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The Project would help meet future energy requirements and support the transition to a net zero economy. |
| **Assessment Principles** | | |
| **4.1 General Policies and Considerations** | | |
| 4.1.2 | The Clean Power 2030 Action Plan, Energy White Paper and British Energy Security Strategy all emphasise the importance of the government's net zero commitment and efforts to fight climate change, as well as the need to maintain a secure and reliable energy system. The Levelling Up White Paper calls on the government to ensure investment in the transition to Net Zero benefits less well-performing parts of the UK, reducing emissions, facilitating economic development and the creation of jobs. | The Project has taken consideration of the Clean Power 2030 Action Plan, Energy White Paper and British Energy Security Strategy and will contribute to achieving the government's net zero commitment and efforts to fight climate change, as well as the need to maintain a secure and reliable energy system. By reinforcing the electricity transmission network between the North of England and the Midlands and facilitating the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability, the Project would help meet future energy requirements and support the creation of jobs and transition to a net zero economy. |
| 4.1.3 | Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused. | Section 104(3) of the Planning Act 2008 sets out that an application for development consent should be determined in accordance with the relevant NPS except to the extent that to do so would contravene matters, referred to at paragraph 1.1.4 of NPS EN-1 and set out in subsections (4) to (8) of the Planning Act 2008. It is not considered that any of these limited circumstances would apply, therefore the application will be assessed against the relevant NPS, any local impact report (LIR) and any other matters that the SoS thinks are both important and relevant to the decision.<br>The level of urgency for the Project is set out in section 3 of **Application Document 5.5 Planning Statement** and **Application Document 7.17 Strategic Options Report Including Needs Case**. The presumption in favour is firmly engaged. |
| 4.1.4 | The presumption is also subject to the provisions of the Planning Act 2008 referred to at paragraph 1.1.4 of this NPS | |
| 4.1.5 | In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account: | The application is accompanied by and ES (**Application Documents 6.1 to 6.22**) which provides the final assessment of the likely significant effects associated with the Project during its construction and operation (including maintenance). **Application Document 5.5 Planning Statement** concludes that the clear and substantial benefits of the Project, which include its contribution to meeting the need for the Clean Power 2030 Mission and net zero, energy |

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| | • Its potential benefits including its contribution to meeting the need for the Clean Power 2030 Mission and net zero, energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits;<br>• Its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy. | infrastructure, and job creation during construction, clearly outweigh any adverse impacts. NPS EN-1 paragraph 4.2.28 states that '*Where residual non-HRA or non MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure*', or in other words, '*it is unlikely that consent will be refused on the basis of these residual impacts*' (Figure 2: Application of CNP in decisions relating to Environmental Impacts Assessments of NPS EN-1). As further set out in paragraph 4.2.28, the exceptions to this presumption of consent relate to circumstances in which residual effects would present '*an unacceptable risk to, or unacceptable interference with*' human health and public safety, defence, irreplaceable habitats, the achievement of net zero, offshore navigation, and flood and coastal erosion risk. None of the exceptions to the presumption of consent set out in paragraph 4.2.15 apply. There are also no residual effects relating to a HRA or MCZ, therefore paragraph 4.2.30 of NPS EN-1, states that the Secretary of State will take as the starting point for decision-making that such infrastructure (CNP) '*is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances*'. |
| 4.1.6 | In this context, the Secretary of State should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels. These may be identified in this NPS, the relevant technology specific NPS, in the application or elsewhere (including in local impact reports, marine plans, and other material considerations as outlined in Section 1.1). | The environmental, social and economic benefits of the Project are set out in section 7 of **Application Document 5.5 Planning Statement**. The adverse impacts of the Project are set out in the appraisal sections (i.e. 6, 7 and 8) of the **Application Document 5.5 Planning Statement**. These consider impacts and benefits at national, regional and local levels. The benefits of the Project are weighed against its adverse impacts in the Planning Balance in section 7 of **Application Document 5.5 Planning Statement**. |
| 4.1.7 | Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development. For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects not capable of being addressed by application of the mitigation hierarchy, in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, or irreplaceable habitats. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk. See paragraph 4.2.28 of this NPS for further detail. | The Project is a proposal by National Grid to reinforce the high voltage power network in the Humber and East Midlands. The reinforcement is needed because the existing transmission network, even with current upgrading, will not have sufficient capacity for the new renewable energy (a substantial proportion of which is generated by offshore wind) that is expected to connect to the network over the next ten years and beyond. Completion of the Project, together with other new reinforcements across the country will meet this future energy transmission demand both in the Humber and East Midlands and across the UK.<br>**Application 5.5 Planning Statement** explains that the Project is CNP infrastructure as defined in NPS EN-1. Without reinforcement, the capacity of the existing network in the Humber and East Midlands is insufficient to accommodate the connection of proposed new power sources connecting in the area. As such, the Project is considered to be a means of all of the following:<br>• Connecting a new generating station or storage facility to the network;<br>• Reinforcing the network to accommodate such connections; and<br>• Reinforcing the network to ensure that it is sufficiently resilient and capacious.<br>In line with paragraph 4.1.7 where a project qualifies as CNP infrastructure the need case for the project will likely outweigh residual effects, unless the residual effects present an unacceptable risk to, or interference with the listed matters. **Application Documents 6.1 to 6.21 Environmental Statement** and **Application Document 5.5 Planning Statement** conclude that the Project will not result in residual impacts which present an unacceptable risk to the matters listed in the policy. |
| 4.1.12 | Other matters that the Secretary of State may consider both important and relevant to their decision-making may include Development Plan documents or other documents in the Local Development Framework. | National Grid has identified Development Plan documents that may be considered both important and relevant by the SoS. Policies relevant to the assessments are contained in this Policy Compliance Document. |
| 4.1.13 | Where the project conflicts with a proposal in a draft Development Plan, the Secretary of State should take account of the stage which the Development Plan document in England or Local Development Plan in Wales has reached in deciding what weight to give to the | Development Plan documents and emerging plans have also been considered in **Application Document 5.5 Planning Statement**, which provides an assessment of the Project's compliance with the relevant policies contained in these documents. This is further detailed in Table 1.5 to 1. 1.8 of this |

| Para | NPS EN-1 Policy Requirement | |
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| | plan for the purposes of determining the planning significance of what is replaced, prevented, or precluded. | Policy Compliance Document. Where there is conflict between Development Plan documents and an NPS, this has been recognised in the appraisal sections of **Application Document 5.5 Planning Statement**; however, it has been noted that the NPS prevails for the purpose of decision making. |
| 4.1.14 | The closer the Development Plan document in England or Local Development Plan in Wales is to being adopted by the LPA, the greater the weight which can be attached to it. | |
| 4.1.15 | The Secretary of State should also consider spatial plans, such as the Strategic Spatial Energy Plan upon endorsement by all relevant governments. | |
| 4.1.16 | In the event of a conflict between these documents and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure. | |
| 4.1.17 | The Secretary of State should only impose requirements in relation to a development consent that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects. | The application is accompanied by **Application Document 3.1 Draft Development Consent Order** and **Application Document 3.2 Explanatory Memorandum**. The draft DCO, while it may be subject to amendments throughout the examination, sets out the requirements in respect of the construction and operation (including maintenance) of the Project. The Requirements and their suggested reason for imposition are also explained in **Application Document 3.2 Explanatory Memorandum**. The proposed Requirements have been considered against the tests for planning conditions as set out in the NPPF and NPPG. |
| 4.1.18 | The Secretary of State should consider the guidance in the NPPF, the Planning Practice Guidance: Use of Planning Conditions, and TANs, or any successor documents, where appropriate. | |
| 4.1.19 | The Secretary of State may consider any development consent obligations that an applicant agrees with local authorities. These must be relevant to planning, necessary to make the proposed development acceptable in planning terms, directly related to the proposed development, fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respects. | There are no planning obligations required for the Project. |
| 4.1.20 | Early engagement both before and at the formal pre-application stage between the applicant and key stakeholders, including public regulators, Statutory Consultees (including Statutory Nature Conservation Bodies (SNCBs)), and those likely to have an interest in a proposed energy infrastructure application, is strongly encouraged in line with the government's pre-application guidance. This means that only applications which are fully prepared and comprehensive can be accepted for examination, enabling them to be properly assessed by the Examining Authority and leading to a clear recommendation report to the Secretary of State. | **Application Document 5.1 Consultation Report** provides a complete overview of the consultation and stakeholder engagement activities on the Project and explains how National Grid has had regard to the statutory guidance about the pre-application procedure pursuant to section 50 of the Planning Act 2008. |
| 4.1.22 | In deciding to bring forward a proposal for infrastructure development, the applicant will have made a judgement on the financial and technical viability of the proposed development, within the market framework and taking account of government interventions. | At multiple stages of the options appraisal process, National Grid has carried out assessments on the financial and technical viability of the Project as presented within **Application Document 7.17 Strategic Options Report Including Needs Case**. **Application Document 4.2 Funding Statement** explains how the acquisition of the land necessary to build the Project would be funded as well as how the Project generally is to be funded. |
| 4.1.23 | Where the Secretary of State considers that the financial viability and technical feasibility of the proposal has been properly assessed by the applicant, it is unlikely to be of relevance in Secretary of State decision making (any exceptions to this principle are dealt with where they arise in this, or other energy NPSs, and the reasons why financial viability or technical feasibility is likely to be of relevance explained). | |
| **4.2 The critical national priority for low carbon infrastructure** | | |
| 4.2.6 | Before applications are made applicants are required to carry out preapplication consultation on their proposals. The Planning Act 2008 requires only one such consultation, and proposals can change after that consultation without the need to reconsult, unless the project is so altered as to become a different project altogether. There is then further publicity, consultation and engagement within the formal Planning Act process. | **Application Document 5.1 Consultation Report** provides a complete overview of the consultation and stakeholder engagement activities that the Project has undertaken and explains how National Grid has had regard to the consultation requirements of the Planning Act 2008. The Project carried out a non-statutory consultation between 1 June and 27 July 2023, to introduce the Project to the public and consultees. A further localised non-statutory consultation was carried out between 9 July and 6 August 2024 to introduce the eastern corridor and provide an update. National Grid then held a statutory consultation between 18 February and 15 April 2025 the purpose of which was to seek views |

| Para | NPS EN-1 Policy Requirement | |
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| | | and feedback on elements of the Project. The details and feedback from these consultations are set out in **Application Document 5.1 Consultation Report**. |
| 4.2.7 | We recommend that applicants consider additional consents, licences and permit requirements at the earliest possible stage. Applicants should consider parallel tracking of the environmental permitting and planning applications, and engaging with the Environment Agency's (EA) permitting pre-application service to help ensure that project design considers the requirements of the environmental permitting regime at the earliest opportunity. | **Application Document 5.4 Consents and Licences Required Under Other Legislation** sets out at a high level the consents that are, or may be, required to construct and operate the Project, together with how those consents would be obtained. Environmental permitting and planning applications have also been tracked alongside the development of the Project and taken into account in the **Environmental Statement (Application Document 6.1 to 6.22)**. Engagement with the EA has been undertaken throughout the Project design development to ensure the requirements of the environmental permitting regime has been considered. Details of this engagement is set out in **Application Document 5.8.1 Statement of Common Ground – Environment Agency**, and the **Environmental Statement (Application Document 6.1 to 6.22)**. |
| 4.2.8 | Where it is required by law at the pre-application consultation stage, preliminary environmental information should be provided. This information should be enough for statutory advisors to develop an informed view of the likely significant environmental effects of the development. It is not expected to be the full, finalised Environmental Statement. | As set out in **Application Document 5.1 Consultation Report**, a Preliminary Environmental Information Report (PEIR) was provided and consulted on as part of the Projects statutory consultation which was held from 18 February and 15 April 2025. |
| 4.2.9 | While applicants may carry out further non-statutory consultation, these should serve a clear purpose and be focused and targeted at ensuring the project is ready for the statutory consultation. Applicants should avoid using these repeated consultations to test the minimum level of mitigation and compensation for impacts. Instead, mitigations should be built in from the start. For this reason, early engagement with relevant statutory consultees is recommended and applicants should maintain this engagement throughout pre-application. This ensures that issues are identified and addressed as early as possible. | **Application Document 5.1 Consultation Report** sets out details of the non-statutory consultations carried out for the Project, explaining the purpose and focus of these. Two non-statutory consultations took places prior to the statutory consultation, with the aim to firstly introduce the Project and options to consultees and the public, and secondly to provide a localised consultation to introduce the eastern corridor to provide stakeholders the opportunity to provide feedback ahead of the more detailed design. Embedded mitigations have been built into the project from the beginning, and these have been consulted on with stakeholders from an early stage as set out in **Application Document 5.1 Consultation Report** and **Application Documents 5.8.1 to 5.8.9 Statements of Common Ground.** |
| 4.2.10 | Objections to the adequacy of pre-application consultation must be fair, accurate and not based on the objector's view of the underlying scheme. So long as an applicant has acted reasonably and met the statutory requirements there should be no objections to the adequacy of the consultation process. | The Applicant has prepared an Adequacy of Consultation Milestone (AoCM) report which details the elements of consultation that have been carried out for the Project. National Grid consulted the host and neighbouring local authorities about the adequacy of consultation undertaken by National Grid to date and to demonstrate National Grid's compliance with the statutory provisions of the PA 2008, in line with the agreed Statement of Community Consultation (SoCC). **Application Document 5.1 Consultation Report Appendices, Appendix J Adequacy of Consultation Milestone** sets out the feedback received and National Grid's responses. |
| 4.2.12 | Applicants must ensure that applications are ready to be examined before an application is made. The Planning Act 2008 system is designed to be frontloaded and applications should not enter the statutory system if they are not ready to be consented. Examining Authorities, and indeed Secretaries of State, should be focused on considering the planning merits of an application, and not using time during the examination and decision-making stages seeking to address deficiencies in an application. Applicants and affected parties should ensure that protective provisions have been agreed ahead of statutory deadlines. | The Application has been prepared by National Grid and the Project team which consists of professional consultants and experts with extensive experience of working on DCO documentation. The Application has been made in accordance with the Planning Act 2008 and the Project has been frontloaded in terms of design, consultation, environmental assessments and studies and legal requirements to ensure that it is ready to be examined in detail once submitted. Protective Provisions have been agreed with affected parties as far as practicable and these are set out in **Application Document 3.1 Draft Development Consent Order**. |
| 4.2.13 | Applicants and their consultants and advisors must ensure that their applications are clear and accessible to both the public and decision makers. Applications should be proportional, clear and focussed in order to ensure the planning process can move at the pace required to meet the Clean Power 2030 Mission. Applicants must ensure their applications are concise whilst still containing the necessary, high quality, information the Examining Authority, statutory consultees and the Secretary of State expect to see in order to make an informed decision. The ES should therefore be proportionate and focused, with just the sufficient detail required to clearly identify the likely significant effects from the proposal. | The Application has been prepared to be as clear and accessible to both the public and decision makers as possible. It has been drafted to be as concise as possible whilst still containing the necessary, high quality, information the Examining Authority, statutory consultees and the Secretary of State require in order to make an informed decision. For example, the technical chapters of the Environmental Statement have been summarised in the Non-Technical Summary of the ES so the public and non-technical consultees can understand the impacts of the Project easily, while more technical specialists can examine the more technical chapters and appendices of the ES, alongside other relevant documents submitted as part of the DCO Application. Notwithstanding this, the ES has been prepared to be proportionate and focused with sufficient detail required to clearly identify |

| Para | NPS EN-1 Policy Requirement | |
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| | | likely significant effects from the Project. **Application Document 6.5 Environmental Statement Chapter 5 EIA Approach and Methodology** explains the approach taken to preparing the ES. |
| 4.2.16 | Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure to meet the Clean Power 2030 Mission and net zero. Paragraphs 4.2.17 and 4.2.18 below set out the projects to be prioritised for the Clean Power 2030 Mission and net zero. The CNP policy below applies to these projects. This does not extend the definition of what counts as nationally significant infrastructure: the scope remains as set out in the Planning Act 2008. | The Project is identified as a National Significant Infrastructure Project (in accordance with Part 3, Section 14(1)(b) and Section 16(1)(a) of the Planning Act 2008). The Project is Critical National Priority Infrastructure being electricity grid infrastructure including network reinforcements and upgrade works, within the scope of CNP as set out in paragraph 4.2.17. |
| 4.2.17 | Low carbon infrastructure for the purposes of this policy means, for electricity generation, all onshore and offshore generation that does not involve fossil fuel combustion (that is, renewable generation, including anaerobic digestion plants provided they meet existing definitions of low carbon; and nuclear energy generation), as well as natural gas fired generation which is carbon capture ready. EfW developments are not critical to meeting the Clean Power 2030 Mission and therefore CNP policy does not apply to applications for EfW projects. For electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System. Other energy infrastructure, fuels, pipelines and storage infrastructure, which fits within the normal definition of “low carbon”, such as hydrogen distribution, and carbon dioxide distribution are also classed as low carbon infrastructure for the purposes of this policy. | |
| 4.2.19 | The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in paragraphs 3.2.8 to 3.2.10 of EN-1, is the starting point for all assessments of energy infrastructure applications. | The Project is Critical National Policy and the presumption is engaged.<br>The Project has been designed following the mitigation hierarchy. At the routeing and siting stage, the Project design process was informed by the Holford Guidance to avoid impacts where possible. These established guidelines informed the evaluation criteria and how the mitigation hierarchy was applied during the options selection process.<br>The mitigation hierarchy is a key component of the Environmental Impact Assessment Process. **Application Document 6.5 Chapter 5 EIA Approach and Methodology** describes the mitigation hierarchy as a stepped process that helps development projects to address potentially adverse impacts on the environment.<br>The adopted design approach is set out within **Application Document 6.3 Chapter 3 Main Alternatives Considered** which describes the evolution of the Project from Strategic Options through to the selection of the alignment and the technology choice submitted within the application for development consent. The **Application Document 6.1 to 6.22 Environmental Statement**, **Application Document 5.9 Design Development Report** and **Application Document 5.5 Planning Statement**, **Application Document 5.10 Design Approach Document** and **Application Document 7.20 Design Development Report - 2025** demonstrate that the mitigation hierarchy has been applied throughout the design and development of the Project.<br>Section 7 of **Application Document 5.6 Planning Statement** presents the planning balance explaining the weight given to the adverse impacts of the Project and its benefits and the application of the CNP related policies to the Project. |

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| 4.2.20 | The CNP policy does not create an additional or cumulative need case or weighting to that which is already outlined for each type of energy infrastructure. The policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. As such, it is relevant during Secretary of State decision making and specifically in reference to any residual impacts that have been identified. It should therefore also be given consideration by the Examining Authority when it is making its recommendation to the Secretary of State. | The Proposed Project does not result in any HRA or MCZ residual impacts. Therefore, there is no need for the SoS to consider making a derogation under the Habitats Regulations and the presumption of consent for CNP infrastructure still stands. Further justification is provided in the response to 4.2.28 to 4.2.30 below. |
| 4.2.21 | During decision making, the CNP policy will influence how non-HRA and non-Marine Conservation Zone (MCZ) residual impacts are considered in the planning balance. The policy will therefore also influence how the Secretary of State considers whether tests requiring clear outweighing of harm, exceptionality, or very special circumstances have been met by a CNP Infrastructure application. Further detail is provided in paragraphs 4.2.28 to 4.2.30, and Figure 2. | |
| 4.2.23 | Applicants for CNP infrastructure must continue to show how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements. | **Application Document 5.5 Planning Statement** sets out how the Application meets the requirements of the designated NPS (EN-1, and EN-5), while **Application Document 6.1 to 6.22 Environmental Statement** assesses the potential environmental impacts of the Project. **Application Document 6.1 to 6.22 Environmental Statement** demonstrates that the mitigation hierarchy has been applied throughout the design and development of the Project and addresses all the relevant regulatory requirements related to the assessment of environmental impact.<br>**Application Document 5.9 Design Development Report** and **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered** outline the design evolution and options appraisal for the Project. These documents demonstrate how strategic corridor selection and subsequent route alignment have embedded the mitigation hierarchy, to avoid environmental receptors such as designated nature conservation sites, designated ancient woodlands, settlements, and heritage assets wherever practicable. Siting and design were further refined in response to extensive pre-application consultation, as recorded in **Application Document 5.1 Consultation Report**. This included dedicated engagement with the appropriate SNCB (Natural England), the Environment Agency (as set out in **Application Document 5.8.1 Statement of Common Ground – Environment Agency**), Historic England, (as set out in **Application Document 5.8.2 Statement of Common Ground – Historic England**) and host planning authorities across statutory consultation stages and through technical working group meetings.<br>Because the Project constitutes linear electricity transmission infrastructure (a 400 kV overhead line) rather than a generation asset, policy considerations concerning a "reduction in generation capacity" are not directly applicable; however, the design ensures full operational transfer capability while minimising environmental land-take through tower micro-siting and the use of the Limits of Deviation (LoD). As concluded in **Application Document 5.5 Planning Statement**, all identified residual adverse effects represent those that cannot reasonably be avoided, reduced, or mitigated through engineering design.<br>Where residual impacts cannot be avoided or mitigated, appropriate compensation and enhancement frameworks have been established. This includes but is not limited to, off-site and potential on-site habitat creation and enhancement to achieve at least 10% Biodiversity Net Gain (**Application Document 7.1 Biodiversity Net Gain Report**), compensatory planting (including an agreed 30:1 replacement ratio should veteran tree loss occur under the LoD), and woodland enhancement works detailed in **Application Document 7.8 Outline Landscape and Ecology Management Plan** (**OLEMP**).<br>Section 7 of **Application Document 5.5 Planning Statement** provides detail about how the mitigation hierarchy has been applied, what residual impacts are and why those residual impacts cannot be avoided, reduced or mitigated, as well as what compensation measures are proposed. |
| 4.2.24 | Applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated. Measures that result in a significant reduction in generation capacity for CNP infrastructure are unlikely to be considered to be appropriate as mitigation. There may be exceptional circumstances where the mitigation could have a significant benefit and warrant a small reduction in generation capacity and function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the effects outweigh the marginal loss of function. | |
| 4.2.25 | Compensation, by definition, does not reduce an adverse effect resulting from a development. However, applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken. Changes to measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered. | |

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| | | **Application Document 7.3 Register of Environmental Actions and Commitments**, secured by Requirement 5 of Schedule 2 of **Application Document 3.1 Draft Development Consent Order**, records all environmental commitments and codifies how measures will be implemented, monitored, and reported. This encompasses:<br>• Embedded design measures intrinsic to the Project;<br>• Standard construction management controls secured through **Application Document 7.2 Outline Code of Construction Practice (CoCP)** and its subordinate management plans (including **Noise and Vibration, and Soil Management Plans**) pursuant to Requirement 4 of Schedule 2 of the draft DCO; and<br>• Additional mitigation and compensation measures secured via Requirement 4 (Construction Management Plans), which secure ongoing environmental clerk of works (ECoW/ArbCoW) oversight, post-construction establishment monitoring, and adaptive management mechanisms to ensure remedial action is taken if performance criteria are not met.<br>Cumulative effects have been systematically assessed across both cumulative dimensions, and are summarised below:<br>• Intra-project cumulative effects: Interacting effects on shared receptors (e.g. communities, transport users, and PRoW networks experiencing concurrent visual, noise, or traffic changes) are evaluated in **Application Document 6.20 Environmental Statement Chapter 20 Intra-project Cumulative Effects**; and<br>• Inter-project cumulative effects: Cumulative interactions with other existing, approved, and reasonably foreseeable major developments across the four-stage PINS guidance framework are evaluated in **Application Document 6.21 Environmental Statement Chapter 21 Inter-project Cumulative Effects**. |
| 4.2.26 | Where residual impacts relate to HRA or MCZ sites then the applicant must provide a derogation case, if required, in the normal way in compliance with the relevant legislation and guidance. | Siting, design, and environmental appraisals for the Project have been undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 and the Marine and Coastal Access Act 2009. There are no Marine Conservation Zones (MCZs) designated within or adjacent to the Order Limits or within the Zone of Influence of the Project. Siting and design result in no direct or indirect impacts on MCZs, and no MCZ assessment or derogation case is engaged.<br>Potential effects on European sites (including the Humber Estuary SAC, SPA, and Ramsar site) are comprehensively evaluated in **Application Document 5.2 Habitats Regulations Assessment Report.** As demonstrated through the Appropriate Assessment within the HRA Report, following the implementation of embedded mitigation, standard construction environmental controls, and additional species-specific measures secured through **Application Document 7.3 Register of Environmental Actions and Commitments**, the Project will not result in an adverse effect on the integrity of any European site, either alone or in combination with other plans or projects. Because the Project avoids adverse effects on European site integrity and does not affect any MCZ, no residual HRA or MCZ impacts remain. Consequently, the requirement to prepare an HRA or MCZ derogation case (demonstrating absence of alternative solutions, Imperative Reasons of Overriding Public Interest (IROPI), and compensatory measures) is not engaged. |
| 4.2.27 | The Secretary of State will continue to consider the impacts and benefits of all CNP Infrastructure applications on a case-by-case basis. The Secretary of State must be satisfied that the applicant's assessment demonstrates that the requirements set out above have been met. Where the Secretary of State is satisfied that they have been met, the CNP presumptions set out below apply | **Application Document 5.5 Planning Statement** provides the comprehensive evidence necessary to enable the Secretary of State to assess the balance of impacts and benefits on a case-by-case basis, demonstrating that the qualifying requirements for Critical National Priority (CNP) infrastructure in NPS EN-1 (paragraphs 4.2.16 to 4.2.26) are met. In respect of the statutory exceptions set out in paragraph 4.2.28 of NPS EN-1: |
| 4.2.28 | Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts. The exception to this | • Human Health and Public Safety: Residual effects are not significant across air quality, noise, traffic, and EMFs, with no statutory nuisance arising under the Environmental Protection Act 1990 (**Application Document 5.3 Statement of Statutory Nuisance**); |

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| | presumption of consent are residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, or irreplaceable habitats. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk. | |
| 4.2.29 | As a result, the Secretary of State will take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. | |

- Defence: Consultations with the MOD DIO have been undertaken and appropriate safeguarding requirements for low-flying and WAM radar links are being discussed;
- Flood and Coastal Erosion Risk: The Project is resilient, does not increase flood risk elsewhere, and compensates for volumetric floodplain storage losses (as set out in **Application Document 7.13 Flood Risk Assessment**);
- Navigation: Navigational headroom is maintained above the River Ouse without in-channel works (see **Application Document 7.22 Navigational Risk Assessment**); and
- Irreplaceable Habitats: Mitigation hierarchy, design and siting of the Project completely avoid loss or deterioration of designated ancient woodland and trees listed on Natural England's Ancient Woodland Inventory (AWI). However, the current alignment would cause loss or deterioration to Socken Wood and Wood Farm Woodland with Characteristics of Ancient Woodland, which is an irreplaceable habitat. There is also potential for the loss of one veteran tree (T4) if the Limits of Deviation (LoD) are exercised in Route Section A, and significant adverse impacts on Jillywood Lane LWS (which contains Woodland with Characteristics of Ancient Woodland).

Section 6.2 of this Planning Statements sets out in detail how the Project has applied the mitigation hierarchy appropriately in designing the Project to avoid as far as possible, adverse effects on irreplaceable habitats. It also explains how the location, routeing and siting of the Project has been designed to avoid impacts on designated ancient woodland and veteran trees as far as practicable.

Mitigation is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments** to ensure that impacts are reduced as far as practicable on Socken Wood and Wood Farm, and a compensation strategy for replacement planting with a ratio of 3:1 is proposed and secured in **Application Document 7.8 Outline Landscape and Ecology Management Plan.**

In the event that the LoD is used and the loss of one veteran tree is required, compensation planting (with a replanting ratio of 30:1) would be implemented as secured in **Application Document 7.3 Register of Environmental Actions and Commitments** and agreed with Natural England and East Riding of Yorkshire Council.

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

Therefore, in accordance with paragraph 5.4.55 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) it is considered that the overriding public need and benefit of the Project (as set out in sections 3 and 7.5 of the **Application Document 5.5 Planning Statement**) would clearly outweigh the loss or deterioration of the habitat, and it would be wholly exceptional. In addition, relevant compensation strategies are provided which can be delivered within the Order Limits for the potential impacts and is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan and Application Document 7.3 Register of Environmental Actions and Commitments**. Therefore, it is considered that the Project is in accordance with paragraphs 5.4.15 to 5.4.16, 5.4.33 and 5.4.55 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) regarding irreplaceable habitats.

In terms of acceptability as set out in paragraph 4.2.28 of NPS EN-1, it is considered that the loss or deterioration of Woodland with Characteristics of Ancient Woodland (at Socken Wood and Wood Farm) would be relatively limited, and localised, amounting to the loss of approximately 0.51 ha and the management of approximately 0.18 ha of Woodlands with Characteristics of Ancient Woodland. Extensive mitigation is proposed to ensure impacts are limited, including:

- Restricting tree loss to only those essential for the proposed overhead line clearance.

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| | | • All affected trees in Socken Wood will be soft felled.<br>• Where trees are coppiced and/or felled to facilitate the construction of the Project, sufficient trees (quantity agreed with the ArbCoW and ECoW) will be placed within the woodland and/or mitigation planting areas in locations agreed with the ECoW in the form of log piles (and not wood chips).<br>• For those not used for log piles, these will not be left as woodchip within the woodlands.<br>• Any trees removed within the area of potential ancient woodland will not be removed to below ground level and not grubbed out to reduce the impact to soil and ground flora.<br>• No other access will be taken for works through the woodlands to protect ground flora and retained trees.<br>Additionally, compensation planting proposed for Socken Wood would be immediately adjacent to the woodland, following the lines of a historic woodland previously present in this area, which would not only restore this woodland but also enhance links to Socken Wood. Compensation planting is also proposed for Wood Farm in proximity to the existing woodland. National Grid has committed to a 3:1 replacement for individual trees and individual trees within small groups which would include replacement planting for Socken Wood and Wood Farm.<br>It is therefore concluded that the Project would not result in an unacceptable impact to or interference with Socken Wood and Wood Farm Woodland with Characteristic of Ancient Woodland.<br>Similarly, in the event that the LoD are used, and impacts arise on one veteran tree (T4) and Jillywood Lane LWS, the proposed mitigation to reduce impacts as far as practicable, and proposed compensation strategies are considered sufficient to ensure that the Project would not have an unacceptable impact on or interference with veteran tree (T4) and Jillywood Lane LWS.<br>As set out above, none of the exceptions to the presumption of consent set out in paragraph 4.2.28 of NPS EN-1 apply. The presumption in favour of consent for CNP infrastructure is therefore not affected with regard to these exceptions. The Secretary of State should therefore take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. |
| 4.2.30 | This means that the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests:<br>• Where development within a Green Belt requires very special circumstances to justify development;<br>• Where development within or outside a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs;<br>• Where development in nationally designated landscapes require s exceptional circumstances to be demonstrated; and<br>• Where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional. | Siting, options appraisal, and Project design have embedded the mitigation hierarchy from inception, seeking to avoid sensitive assets wherever practicable as documented in **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered** and **Application Document 5.9 Design Development Report**.<br>As established in Section 3 and Section 7.2 of **Application Document 5.5 Planning Statement** and **Application Document 7.17 Strategic Options Report Including Needs Case**, the Project constitutes Critical National Priority (CNP) infrastructure under Section 4.2 of NPS EN-1.<br>As set out above, none of the exceptions to the presumption of consent set out in paragraph 4.2.28 of NPS EN-1 apply. The presumption in favour of consent for CNP infrastructure is therefore not affected with regard to these exceptions. The Secretary of State should therefore take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.<br>The Project meets the specified list of policy tests as follows:<br>• Green Belt (Very Special Circumstances): Siting and alignment choices completely avoid designated Green Belt land. The test requiring very special circumstances is therefore not engaged.<br>• Sites of Special Scientific Interest (SSSIs): Siting avoids direct physical impact on statutory nationally designated sites. As evaluated in **Application Document 6.8 Environmental Statement Chapter 8 Ecology** and **Application Document 6.9 Environmental Statement** |

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| | | **Chapter 9 Ornithology**, potential indirect effects (such as hydrological linkages or bird flight lines) are fully mitigated via controls in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, and no significant residual adverse effects are expected. Under the CNP starting point, the substantial national public benefits and urgent need for the Project in this location are treated as clearly outweighing any potential residual impacts on notifying features of nearby SSSIs or the wider national SSSI network.<br>• Nationally Designated Landscapes (Exceptional Circumstances): Siting and routeing of the 400 kV overhead line have adhered to the Holford guidance and avoided all National Landscapes (formerly Areas of Outstanding Natural Beauty) and National Parks across its approximately 90 km alignment, as confirmed in **Application Document 6.6 Environmental Statement Chapter 6 Landscape**. Siting also maintains a separation distance of approximately 11.4 km from the draft boundary of the proposed Yorkshire Wolds AONB, ensuring its statutory purposes are not significantly affected. The exceptional circumstances test for major development inside nationally designated landscapes is therefore not engaged; however, should any indirect setting considerations be raised, they are treated as satisfied by virtue of the CNP starting point and the absence of viable alternative transmission corridors outside the regional boundary.<br>• Heritage Assets (Substantial Harm / Wholly Exceptional Test): As detailed in **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage**, the Project avoids the physical destruction or demolition of any designated heritage assets. The Heritage Statement of Harm (Appendix A of the Planning Statement) concludes that the Project would not result in substantial harm to any heritage asset. In total, the Project would result in less than substantial harm to 66 heritage assets, which comprises 59 designated heritage assets, six conservation areas and one non-designated asset. Most of this harm is at the lower end of the scale, with nine designated heritage assets and one conservation area at the middle of the scale, and one designated heritage asset (Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190) which is a scheduled monument) at the higher end of the scale. National Grid has undertaken an iterative design process taking account of policy requirements, historic landscape character assessments and desk-based and fieldwork analysis in order to minimise and avoid, where possible, harm to the historic environment. In accordance with the mitigation hierarchy, the design of the Project has sought to avoid, reduce or mitigate potentially significant adverse effects on designated and non-designated heritage assets. Design decisions have been made to balance the need to avoid and reduce impacts on heritage assets, along with other environmental, social and operational considerations. Embedded mitigation measures are also incorporated into the design to minimise impacts as far as practicable, as secured **in Application Document 7.3 Register of Environmental Actions and Commitments.** It is considered that the overriding public benefits and need for the Project (as outlined in section 3 and 7 of this Planning Statement) would clearly and demonstrably outweigh the significant and less than substantial harm to heritage assets.<br>By applying this statutory policy presumption alongside the comprehensive mitigation and control frameworks secured under Schedule 2 of **Application Document 3.1 Draft Development Consent Order**, the Project fully satisfies paragraph 4.2.30 of NPS EN-1. |
| 4.2.31 | Any HRA or MCZ residual impacts will continue to be considered under the framework set out in the Habitats Regulations and the Marine and Coastal Access Act 2009 respectively. | National Grid recognises that the Critical National Priority (CNP) policy presumption does not override or displace the statutory assessment frameworks established under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Marine and Coastal Access Act 2009. Accordingly, potential impacts on European sites and marine protected areas have been assessed strictly in accordance with their respective legal regimes:<br>• Habitats Regulations Assessment (HRA): A comprehensive HRA has been undertaken and is reported in **Application Document 5.2 Habitats Regulations Assessment Report**. The assessment methodically follows the HRA stages, evaluating potential pathways of impact, |

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| | | including airborne dust/emissions, surface water run-off, disturbance, and bird flight collision risks, on European sites within the National Site Network (including the Humber Estuary Special Area of Conservation (SAC), Special Protection Area (SPA), and Ramsar site). Following Stage 2 Appropriate Assessment, and with the incorporation of established avoidance, control, and species-specific mitigation measures secured in **Application Document 7.3 Register of Environmental Actions and Commitments**, the assessment concludes beyond reasonable scientific doubt that the Project will not result in an adverse effect on the integrity (AEOI) of any European site, either alone or in combination with other plans or projects. Consequently, there are no residual adverse effects on European site integrity, and recourse to the statutory derogation procedures (no alternatives, IROPI, and compensatory measures) is not engaged.<br>• Marine Conservation Zones (MCZs): In accordance with the Marine and Coastal Access Act 2009, consideration has been given to protected marine areas. No MCZs are situated within or adjacent to the Order Limits, nor are any MCZs hydrologically or ecologically connected to the works in a manner that could give rise to adverse effects. The Project does not involve works within the marine environment, and the overhead line crossing of the tidal River Ouse maintains full vertical clearance without in-channel physical intervention. Therefore, no residual MCZ impacts arise.<br>Because the Project avoids residual adverse effects on the integrity of European sites and causes no impact on MCZs under their statutory assessment frameworks, the Project fully complies with paragraph 4.2.31, and no derogation is necessary. |
| 4.2.32 | Where, following Appropriate Assessment, CNP Infrastructure has residual adverse impacts on the integrity of sites forming part of the UK national site network, either alone or in combination with other plans or projects, the Secretary of State will consider making a derogation under the Habitats Regulations. | No derogation is required, as demonstrated in the response to 4.2.31. |
| 4.2.34 | For both derogations, the Secretary of State will consider the particular circumstances of any plan or project, but starting from the position that energy security and decarbonising the power sector to combat climate change:<br>• Requires a significant number of deliverable locations for CNP Infrastructure and for each location to maximise its capacity. This NPS imposes no limit on the number of CNP infrastructure projects that may be consented. Therefore, the fact that there are other potential plans or projects deliverable in different locations to meet the need for CNP Infrastructure is unlikely to be treated as an alternative solution. Further, the existence of another way of developing the proposed plan or project which results in a significantly lower generation capacity is unlikely to meet the objectives and therefore be treated as an alternative solution; and<br>• Are capable of amounting to imperative reasons of overriding public interest (IROPI) for HRAs, and, for MCZ assessments, the benefit to the public is capable of outweighing the risk of environmental damage, for CNP Infrastructure. | |
| 4.2.35 | For HRAs, where an applicant has shown there are no deliverable alternative solutions, and that there are IROPI, compensatory measures must be secured by the Secretary of State as the competent authority, to offset the adverse effects to site integrity as part of a derogation. For MCZs, where an applicant has shown there are no other means of proceeding which would create a substantially lower risk, and the benefit to the public outweighs the risk of damage to the environment, the Secretary of State must be satisfied that measures of equivalent environmental benefit will be undertaken. | No such consideration by the SoS is required, as demonstrated in the response to 4.2.31. |

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| **4.3 Environment Effects/Considerations** | | |
| 4.3.1 | All proposals for projects that are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project. | An ES (**Application Document 6.1 to 6.22**) has been submitted with the application. It provides an assessment of aspects of the environment likely to be significantly affected by the Project in accordance with the EIA Regulations and paragraph 4.3.3. All of the embedded, control and management and additional mitigation measures that National Grid has committed to are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**. The Applicant has also prepared the following management plans:<br>• **Application Document 7.2 Outline Code of Construction Practice**;<br>• **Application Document 7.4 Outline Construction Traffic Management Plan**;<br>• **Application Document 7.5 Outline Soil Management Plan**;<br>• **Application Document 7.6 Outline Public Rights of Way Management Plan**;<br>• **Application Document 7.7 Outline Noise and Vibration Management Plan**;<br>• **Application Document 7.8 Outline Landscape and Ecology Management Plan**;<br>• **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**; and<br>• **Application 7.10 Outline Cultural Heritage Management Plan**.<br>Detailed versions of the management plans will be prepared post consent (should consent be granted) as secured by Requirements in **Application Document 3.1 Draft Development Consent Order**. |
| 4.3.3 | The EIA Regulations require an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects. | |
| 4.3.4 | To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. This information could include matters such as employment, equality, biodiversity net gain, community cohesion, health and wellbeing. | **Application Documents 6.1 to 6.22 Environmental Statement** provides an assessment of likely significant environmental, social and economic effects arising during construction and operation of the Project and shows how any likely significant negative effects would be avoided, reduced or mitigated following the mitigation hierarchy.<br>Section 6 and 7 of **Application Document 5.5 Planning Statement** summarise the likely residual impacts of the Project against the relevant national and local policies and provide a conclusion on how the benefits of the Project outweigh the likely negative effects following the mitigation hierarchy. |
| 4.3.5 | For the purposes of this NPS and the technology specific NPSs the ES should cover the environmental, social and economic effects arising from pre-construction, construction, operation and decommissioning of the project. | **Application Documents 6.1 to 6.22 Environmental Statement** covers the environmental, social and economic effects arising from construction and operation (including maintenance) of the Project. |
| 4.3.9 | As in any planning case, the relevance or otherwise to the decision making process of the existence (or alleged existence) of alternatives to the proposed development is, in the first instance, a matter of law. This NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective. Although there are specific requirements in relation to compulsory acquisition and habitats sites, the NPS does not change requirements in relation to compulsory acquisition and habitats sites. | There is no general requirement from a policy perspective to consider alternatives or to establish whether the Project represents the 'best option'. **Application Document 5.5 Planning Statement** and **Application Document 5.9 Design Development Report** set out how the Project accords with policies and legislation where consideration of alternatives may be relevant.<br>In addition, **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered** sets out information in relation to the main alternatives considered, as required by the EIA Regulations. |
| 4.3.10 | The applicant must provide information proportionate to the scale of the project, ensuring the information is sufficient to meet the requirements of the EIA Regulations. | The application is proportionate to the scale of the Project with regards to the requirements set out in the EIA Regulations. The Project constitutes Environmental Impact Assessment (EIA) development as defined in the EIA Regulations. The Project falls within Schedule 1 paragraph 20 of the EIA Regulations, '*Construction of overhead electrical power lines with a voltage of 220 kV or more and a length of more than 15 km*'.<br>A Scoping Report (**Application Document 6.5.A1**) was submitted to the Planning Inspectorate on 21 August 2023. This set out the parameters of the Project, the proposed methodology for undertaking the environmental assessment and the proposed scope of the EIA. It also identified the potentially significant environmental effects (as identified at that time) that would be assessed in |

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| | | more detail (i.e. scoped into the assessment), as well as those that were unlikely to be significant and could therefore be scoped out of the assessment.<br>Further details on the EIA process and methodology can be found in **Application Document 6.5 Environmental Statement Chapter 5 Environmental Impact Assessment Approach and Methodology**. |
| 4.3.11 | In some instances, it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case. | As set out in **Application Document 6.5 Environmental Statement Chapter 5 Environmental Impact Assessment Approach and Methodology**, major infrastructure projects, such as linear infrastructure projects for overhead lines, typically need some flexibility to be maintained for detailed design and construction, if conditions are found that would otherwise prevent or delay construction. Examples can include previously unknown archaeological assets or poor ground conditions at pylon locations.<br>To accommodate such issues, a flexible approach to design parameters is used within the EIA process; this is typically referred to as the 'Rochdale Envelope', and it allows for a realistic worst-case assessment to be undertaken in accordance with the Planning Inspectorate's Advice Note Nine: Rochdale Envelope (Planning Inspectorate, 2018) and the requirements of the EIA Regulations (HM Government, 2017).<br>To allow for this flexibility, Limits of Deviation (LoD) have been developed for the Project components. The LoD provide a maximum distance or measurement of variation within which every component of the Project would be located. LoD have accordingly been applied horizontally and vertically and are set out in section 4.4 of **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project**.<br>The assessments presented in the ES have assessed a design envelope in line with the Planning Inspectorate's Advice Note Nine: Rochdale Envelope. In line with this advice the parameters established for the Project are sufficiently detailed to enable a comprehensive assessment of the likely significant environmental effects and the identification of necessary mitigation. Section 5 of each of **Application Documents 6.6 to 6.19** sets out the basis of assessment and how each topic assessment has taken into account the flexibility within the design envelope of the Project.<br>**Application Documents 6.1 to 6.22 Environmental Statement** provides explanations where elements of the Project have yet to be finalised and the reasons why this is the case. |
| 4.3.12 | Where some details are still to be finalised, the ES should, to the best of the applicant's knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed | |
| 4.3.15 | Applicants are obliged to include information about the reasonable alternatives they have studied in their ES. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility. | There is no general requirement from a policy perspective to consider alternatives or to establish whether the Project represents the 'best option'. The **Application Document 5.5 Planning Statement** sets out how the Project accords with policies and legislation where consideration of alternatives may be relevant, for example in relation to the sequential test to avoid areas of high flood risk.<br>Part 1 of Schedule 4 of the EIA Regulations requires that the ES includes an outline of the main alternatives studied by National Grid and an indication of the main reasons for National Grid's choice, taking into account the environmental effects. It is also noted that the NPS requires the ES to describe how the social, economic and environmental effects have been taken into account when making decisions between alternatives. **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered** sets out information in relation to the main alternatives studied, as required by the EIA Regulations, including the 'Do Nothing' alternative, site selection, alternative locations or uses, site evolution and refinement and alternative designs.<br>Alternatives are also a requirement of the **Application Document 5.2 Habitats Regulations Assessment Report**; however, only if adverse effects on the integrity of European sites are identified at the Appropriate Assessment stage (Stage 2). As stated, the **Application Document 5.2 Habitats Regulations Assessment Report** confirms that Stage 2 Appropriate Assessment found no adverse effect on the integrity of the Special Protection Area (SPA) and Ramsar site would occur once mitigation measures identified in the **Application Document 7.2 Outline Code of** |
| 4.3.16 | In some circumstances, the NPSs may impose a policy requirement to consider alternatives. | |

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| | | **Construction Practice** are employed. Hence, the Project is not required to consider alternatives under the Habitats Directive. |
| 4.3.17 | Where there is a policy or legal requirement to consider alternatives, the applicant should describe the alternatives considered in compliance with these requirements. | The EIA Regulations require applicants to document alternative development options considered as part of the application for development consent. **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered** includes an assessment of alternatives setting out the environmental considerations in choosing a preferred option and route. **Application Document 5.5 Planning Statement** and **Application Document 5.10 Design Approach Document** set out how planning policy, namely NPS EN-1 and EN-5, as well as the requirements of the Electricity Act 1989 (HM Government, 1989) and the principles of the Holford guidance have influenced the options appraisal process, demonstrating how such policy objectives have been embedded into the design of the Project. |
| 4.3.18 | The Secretary of State should consider the worst-case impacts in its consideration of the application and consent, providing some flexibility in the consent to account for uncertainties in specific project details. | The assessment presented within each ES topic chapter (**Application Document 6.1 to 6.22**) identifies the likely significant effects based on a reasonable worst case. In addition, **Application Document 6.20 Environmental Statement Chapter 20 Intra-project Cumulative Effects** assesses the intra-project effects and **Application Document 6.21 Environmental Statement Chapter 21 Inter-project Cumulative Effects** assesses the inter-project effects. This assessment is based on the construction methods described in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project** and the proposed route that is described in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project**. However, it should be noted that not all of the permanent aspects of the Project, including pylon locations, are fixed and could be located anywhere within the LoD, as defined on **Application Document 2.4 Works Plans**. |
| 4.3.19 | The Secretary of State should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place. | **Application Document 6.20 Environmental Statement Chapter 20 Intra-project Cumulative Effects** assesses the intra-project effects and **Application Document 6.21 Environmental Statement Chapter 21 Inter-project Cumulative Effects** assesses the inter-project effects of the Project. This includes an assessment of effects on the environment, local economy and cumulative effects. |
| 4.3.20 | Thirteen legally binding targets have been set for England under the Environment Act 2021, covering the areas of: biodiversity; air quality; water; resource efficiency and waste reduction; tree and woodland cover; and Marine Protected Areas (MPAs). Meeting the legally binding targets will be a shared endeavour that will require a whole of government approach to delivery. The Secretary of State should have regard to the ambitions, goals and targets set out in the government's Environmental Improvement Plan for improving the natural environment and enjoyment of nature. This includes having regard to the achievement of statutory targets set under the Environment Act. | **Application Documents 6.1 to 6.22 Environment Statement** covers impacts relating to biodiversity; air quality; water; resource efficiency and waste reduction; tree and woodland cover; and Marine Protected Areas arising from construction, operation (including maintenance) of the Project. The Environment Act 2021 (HM Government, 2021) and Environmental Improvement Plan 2023 (Department for Environment, Food and Rural Affairs, 2023) are considered. |
| 4.3.22 | Given the level and urgency of need for new energy infrastructure, the Secretary of State should, subject to any relevant legal requirements (e.g. under the Habitats Regulations) which indicate otherwise, be guided by the following principles when deciding what weight should be given to alternatives:<br>• The consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner; and<br>• Only alternatives that can meet the objectives of the proposed development need to be considered. | **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered** sets out information in relation to the main alternatives studied, as required by the EIA Regulations and this demonstrates compliance with policy being proportionate and only relating to alternatives that can meet the objectives of the Project. |

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| **4.4 Health** | | |
| 4.4.1 | Energy infrastructure has the potential to impact on the health and well-being ("health") of the population. Access to energy is clearly beneficial to society and to our health as a whole. However, the construction of energy infrastructure and the production, distribution and use of energy may have negative impacts on some people's health. | **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing** provides an assessment of the likely effects on health and wellbeing that could result from the construction and operation (including maintenance) of the Project, including considering access to key public services, transport or the use of open space for recreation and physical activity in relation to effects also identified in **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism**. The Project has been designed to follow the mitigation hierarchy as far as practicable, avoiding or reducing health and wellbeing effects through the process of design development. |
| 4.4.3 | New energy infrastructure may also affect the composition and size of the local population, and in doing so have indirect health impacts, for example if it in some way affects access to key public services, transport, or the use of open space for recreation and physical activity. | |
| 4.4.4 | As described in the relevant sections of this NPS and in the technology specific NPSs, where the proposed project has an effect on humans, the ES should assess these effects for each element of the project, identifying any potential adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate. | **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing** provides an assessment of the likely significant effects of the Project on human health. Embedded mitigation measures that relate to health and wellbeing that have been incorporated into the Project include sensitive routeing and siting of infrastructure and temporary works to avoid or reduce impacts on health and wellbeing receptors, and designing the Project in accordance with National Grid design standards and compliant with international, national and local guidelines and policies relating to electric and magnetic fields (EMFs).<br>Mitigation measures are also proposed during the construction phase to control and manage any impacts, as set out in **Application Document 7.2 Outline Code of Construction Practice**.<br>**Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing** concludes that, following the implementation of mitigation measures, the Project would result in non-significant beneficial impacts as a result of income for local construction workers during the construction phase, as well as education and training during this phase.<br>There would be no significant adverse impacts relating to access to health and social care services, transport, access and connection, air quality, noise, access to open space, leisure and play areas, greenhouse gas, water quality, social cohesion and community identity during the construction or operation (including maintenance) of the Project. The Project would result in a non-significant beneficial effect in relation to climate change mitigation and adaptation as it will enable connection to renewable energy generation.<br>**Application Document 6.21 Environmental Statement Chapter 21 Inter-Project Cumulative Effects** provides an assessment of whether the Project and other relevant developments have cumulative effects on human health. It concludes that there would be no significant cumulative health and wellbeing effects. |
| 4.4.5 | The impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate. | |
| 4.4.6 | Opportunities should be taken to mitigate indirect impacts by promoting local improvements to encourage health and wellbeing. This includes potential impacts on vulnerable groups within society and impacts on those with protected characteristics under the Equality Act 2010, i.e. those groups which may be differentially impacted by a development compared to wider society as a whole. | |
| 4.4.7 | Generally, those aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation (for example for air pollution) which will constitute effective mitigation of them, so that it is unlikely that health concerns will either by themselves constitute a reason to refuse consent or require specific mitigation under the Planning Act 2008. | **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing** provides an assessment of the likely effects on health and wellbeing that could result from the construction and operation (including maintenance) of the Project. **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** and **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** further detail the assessment of potential residual effects of the Project on air (dust, traffic emissions and generator and machinery emissions) and noise (during construction) respectively. The Project has been designed to follow the mitigation hierarchy as far as practicable, to, in the first instance, avoid or reduce health and wellbeing impacts through the process of design development. This has included sensitive routeing and siting of infrastructure. The Project has avoided sensitive features such as centres of population and community, healthcare, and education facilities, where practicable through the corridor and routeing studies. During construction, the Project would comply with the good practice measures within **Application Document 7.2 Outline Code of Construction Practice** which specifies measures that would avoid or reduce effects on health. |
| 4.4.8 | However, not all potential sources of health impacts will be mitigated in this way and the Secretary of State may want to take account of health concerns when setting requirements relating to a range of impacts such as noise. | |

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| **4.6 Environmental and Biodiversity Net Gain** | | |
| 4.6.1 | Environmental net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. Projects should therefore not only avoid, mitigate and compensate harms, following the mitigation hierarchy, but also consider whether there are opportunities for enhancements. | As set out in **Application Document 7.17 Strategic Options Report Including Needs Case, Application Document 7.18 Corridor and Preliminary Routeing and Siting Study, Application Document 7.19 Supplementary Corridor and Routeing Report, and Application Document 5.9 Design Development Report**, the Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce adverse impacts through the process of design development, and by embedding measures into the design of the Project.<br>National Grid has committed to deliver at least 10% Biodiversity Net Gain (BNG) with wider environmental and societal benefits. The Project will achieve a minimum of 10% BNG (through on-site and off-site BNG) and has undertaken a BNG assessment (based on the Statutory Biodiversity Metric calculation tool (Defra, 2026)) which is presented in **Application Document 7.1 Biodiversity Net Gain Report**. |
| 4.6.6 | Energy NSIP proposals, whether onshore or offshore, should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible. | |
| 4.6.7 | In England, applicants for onshore elements of any development are encouraged to use the latest version of the biodiversity metric to calculate their biodiversity baseline and present planned biodiversity net gain outcomes. This calculation data should be presented in full as part of their application. | **Application Document 7.1 Biodiversity Net Gain Report** has been prepared to quantify the overall effect of the Project on the biodiversity value using Defra's 2026 Statutory Biodiversity Metric calculation tool which is the latest biodiversity metric tool used for NSIPs. |
| 4.6.8 | Where possible, this data should be shared, alongside a completed biodiversity metric calculation, with the Local Authority, Natural England and, where relevant, the EA, for discussion at the preapplication stage as it can help to highlight biodiversity and wider environmental issues which may later cause delays if not addressed | National Grid have consulted with the relevant LPA,s Natural England and the EA in relation to BNG. Calculations and the completed biodiversity metric will be submitted with the application for development consent and will be shared with the relevant stakeholders. |
| 4.6.10 | Biodiversity net gain should be applied after compliance with the mitigation hierarchy and does not change or replace existing environmental obligations. | As set out in **Application Document 7.1 Biodiversity Net Gain Report**, National Grid has applied the mitigation hierarchy to avoid and minimise impacts of the Project as far as practicable through measures set out in **Application Document 7.3 Register of Environmental Actions and Commitments**. The Project has sought first to avoid impacts, then minimise unavoidable effects, and finally compensate for residual losses, meaning the BNG calculations have been carried out after compliance with the mitigation hierarchy. |
| 4.6.11 | Biodiversity net gain can be delivered onsite or wholly or partially offsite. We encourage details of any off-site delivery of biodiversity net gain to be set out within the application for development consent. | **Application Document 7.1 Biodiversity Net Gain Report** concludes that the Project would achieve at least 10% BNG through on-site and off-site habitat creation. To achieve a 10% BNG, the Project is predicted to require an additional 436.72 area habitat units, 70.46 hedgerow units and 12.65 watercourse units.<br>The Project proposes to address BNG requirements primarily through off-site habitat creation which will be secured through the purchase and allocation of registered off-site biodiversity units from suitably qualified biodiversity unit providers.<br>National Grid is also exploring opportunities to deliver BNG through habitat creation and enhancement within the Order Limits on land under its ownership or control where the habitats will not affect the operational requirements. Within the Order Limits and adjacent to Treswell Wood, a 12.17-hectare area (the BNG Opportunity Area) has been identified as a potential on-site BNG mitigation location, although acquisition and use for BNG are not yet confirmed. High-level optioneering indicates a feasible habitat creation strategy focused on "other woodland; broadleaved" targeting moderate condition, which would be coherent with the surrounding ancient-semi-natural woodland context and support landscape-scale connectivity goals.<br>Strategically, the proposed woodland creation would contribute to local biodiversity priorities for hazel dormouse (Muscardinus avellanarius) as set out in the Nottinghamshire and Nottingham Local Nature Recovery Strategy, achieving High strategic significance. Functionally, the habitat would extend the existing Treswell Wood assemblage and strengthen ecological networks across the local landscape, improving permeability and resilience for woodland-associated species. |
| 4.6.12 | When delivering biodiversity net gain off-site, developments should do this in a manner that best contributes to the achievement of relevant wider strategic outcomes, for example by increasing habitat connectivity, enhancing other ecosystem service outcomes, or considering use of green infrastructure strategies. Reference should be made to relevant national or local plans and strategies, to inform off-site biodiversity net gain delivery. If published, the relevant strategy is the Local Nature Recovery Strategy (LNRS). If an LNRS has not been published, the relevant consenting body or planning authority may specify alternative plans, policies or strategies to use. | |
| 4.6.13 | In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as:<br>• reductions in GHG emissions<br>• reduced flood risk<br>• improvements to air, water or soil quality<br>• climate adaptation<br>• landscape enhancement | |

| Para | NPS EN-1 Policy Requirement | |
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| | • increased access to natural greenspace, and/or<br>• the enhancement, expansion or provision of trees and woodlands<br>The scope of potential gains will be dependent on the type, scale, and location of specific projects. Applicants should look for a holistic approach to delivering wider environmental gains and benefits through the use of nature-based solutions and Green Infrastructure. | From a quantitative BNG perspective, the Treswell Wood Opportunity Area is estimated to deliver approximately 40.03 area units, which would partially address the current project shortfall of 436.72 area units.<br>The balance between on-site and off-site delivery will be developed as the Project design and the BNG assessment develop through detailed design. The delivery strategy will seek to maximise ecological outcomes, long-term deliverability and security of outcomes, alignment with relevant Local Nature Recovery Strategies, and value for consumers.<br>In the event that on-site BNG delivery options are taken forward, National Grid will seek to establish onsite habitat creation and enhancement measures as early as practicable where habitats can be protected from construction activities and their early delivery would not prejudice the safe and efficient construction or operation of the Project. The programme for habitat creation and enhancement will be developed alongside the detailed Project design and construction programme.<br>The delivery of BNG will be secured through the relevant DCO requirement at set out in **Application Document 3.1 Draft Development Consent Order**, legal agreements and contractual arrangements, as appropriate, and will be implemented in accordance with the applicable consent requirements before the Project becomes operational.<br>Management, monitoring and reporting for onsite biodiversity gains will be undertaken in accordance with **Application Document 7.8 Outline Landscape and Ecology Management Plan** which will be secured by **Application Document 3.1 Draft Development Consent Order**. Offsite biodiversity gains will be managed, monitored and reported in accordance with the relevant legal and contractual arrangements and, where applicable, for a minimum period of 30 years. |
| 4.6.15 | Applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered, and where appropriate, incorporated into proposals as part of good design (including any relevant operational aspects) of the project. | |
| 4.6.19 | Although achieving biodiversity net gain is not currently an obligation on applicants, Schedule 15 to the Environment Act 2021 contains provisions which, when commenced, mean the Secretary of State may not grant an application for a Development Consent Order unless satisfied that a biodiversity gain objective is met in relation to the onshore development in England to which the application relates. | |
| 4.6.21 | The Secretary of State should give appropriate weight to environmental and biodiversity net gain, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited. | |
| **4.7 Criteria for good design for Energy Infrastructure** | | |
| 4.7.1 | The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object – be it a building or other type of infrastructure – including fitness for purpose and sustainability, is equally important. | Good design of transmission infrastructure is primarily governed by application of the Holford guidance within technical limitations to meet safety, security, cost effectiveness and operational requirements.<br>The Project's design, detailed in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project** and informed by alternatives in **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered**, reflects National Grid's duty to be economical, efficient, and safe. **Application Document 5.10 Design Approach Document** sets out how the Project adheres to the 'criteria for good design for Energy Infrastructure' with reference to the Planning Inspectorate's advice guide and the NIC design principles, which collectively state that good design is fundamental to delivering successful and sustainable projects, and that together, they emphasise a holistic approach where projects are built around four core, high-level pillars: Climate (achieving net zero and ensuring climate resilience), People (engaging communities and humanising scale), Places (enhancing and contextualising the local environment), and Value (solving problems to deliver broader public benefits). |
| 4.7.2 | Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area. | |
| 4.7.3 | Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material. | As detailed in **Application Document 5.9 Design Development Report**, the Project has undergone an iterative design process which has been informed by the outcomes of statutory consultation and stakeholder engagement, ongoing environmental assessments, engineering and design considerations, and collaboration with other developers.<br>Section 6 of **Application Document 5.5 Planning Statement** summarises the Project evolution and design approach taken from the onset to submission. |
| 4.7.4 | Given the benefits of good design in mitigating the adverse impacts of a project, applicants should consider how good design can be applied to a project during the early stages of the project lifecycle. | **Application Document 5.10 Design Approach Document** sets out a summary of how good design has been applied to the Project during the early stages of the Project lifecycle. |

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| 4.7.5 | To ensure good design is embedded within the project development, a project board-level design champion could be appointed, and a representative design panel used to maximise the value provided by the infrastructure. Design principles should be established from the outset of the project to guide the development from conception to operation. Applicants should consider how their design principles can be applied post-consent. | **Application Document 5.10 Design Approach Document** sets out National Grid's design principles which have guided the evolution of the Project. The **Application Document 5.10 Design Approach Document** states that, in accordance with the Design Principles for National Infrastructure (National Infrastructure Commission, 2020), National Grid has appointed the Project Director as the nominated Design Champion, of which the core responsibilities of the Design Champion are:<br>• Ensuring a clear brief for the design is established;<br>• Driving the Project development process in line with National Grid's processes;<br>• Ensuring that the design is deliverable;<br>• Developing and ensuring adherence to design governance;<br>• Oversight of the integrated Project team to ensure robust processes are being followed and design decisions are being clearly recorded, e.g. challenge and reviews are being undertaken;<br>• Driving robust consideration of stakeholder feedback as part of the design process, e.g. through design change control; and<br>• Challenging decisions to drive better outcomes and achievement of the design vision.<br>Section 11.2 of **Application Document 5.10 Design Approach Document** covers details on securing the design post-consent. |
| 4.7.6 | Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area. Applicants should also, so far as is possible, seek to embed opportunities for nature inclusive design within the design process. | **Application Document 5.10 Design Approach Document** explains that the primary purpose of the Project is to ensure the Project is delivered in a timely and efficient manner to meet Clean Power 2030 Action Plan (UK Government, 2025) requirements. Therefore, owing to the nature of the Project, a master-planning/place-making approach was not deemed appropriate or necessary, and choice in the physical appearance of overhead pylons is limited. However, as demonstrated through the Design Approach Document, environmental and socio-economic factors have been embedded from the outset, and stakeholder and community feedback has been integrated as part of the design process. National Grid has sought to achieve good design through the careful consideration of route corridors and application of defined design principles, along with the use of flexibility to respond to local constraints and opportunities.<br>As outlined in section 2 of **Application Document 5.10 Design Approach Document**, National Grid employs the Holford guidance to inform the design and routeing of overhead lines as recognised by paragraph 2.9.16 of NPS EN-5. In applying the Holford guidance, the Project has sought to avoid, where reasonably practicable, areas of highest amenity value at the strategic routeing stage. Where avoidance was not possible due to network, environmental or technical constraints, alignment refinement has been undertaken to reduce, where possible, landscape and visual effects through careful siting.<br>Consistent with the Holford guidance and National Grid's established good practice, the Project has, where appropriate, sought to maximise opportunities for close parallel routeing with existing overhead lines. This approach reduces the geographic spread of infrastructure and limits the introduction of new transmission corridors across the landscape. |
| 4.7.7 | Applicants must demonstrate in their application documents how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected. | **Application Document 5.9 Design Development Report** and **Application Document 5.10 Design Approach Document** provide an overview of the design rationale for the Project and how the design choices have sought to reduce the environmental effects of the Project. It demonstrates that the design has embedded mitigation measures in order to avoid or reduce significant environmental effects where practicable. |
| 4.7.8 | Applicants should consider taking independent professional advice on the design aspects of a proposal. In particular, the Design Council can be asked to provide design review for | From the outset of the Project, the National Grid team has been a fully integrated, multi-disciplinary team comprising specialists from a range of disciplines including design, environment, socio-economic, lands, consents, traffic and transport and stakeholder engagement (as well as multiple sub-disciplines including overhead line design, temporary works design, ecologists and landscape |

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| | nationally significant infrastructure projects and applicants are encouraged to use this service. Applicants should also consider any design guidance developed by the LPA. | architects). This team has functioned as a design panel through the design process by working in a collaborative manner to develop and appraise strategic and routeing and siting options. It has also considered feedback from consultation processes and new data gathered through surveys and assessment work, and challenged whether/how the design should change as a result. This has been done through the ongoing evolution of the design and through engaging with technical stakeholders to draw their insights and views into the design process.<br>This infrastructure has minimum functional requirements it must meet with and a very limited scope for any design deviations. Given this, an independent Design Panel was not considered to be necessary and was not engaged during the development of this Project. |
| 4.7.10 | In the light of the above and given the importance which the Planning Act 2008 places on good design and sustainability, the Secretary of State needs to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable, and adaptable (including taking account of natural hazards such as flooding) as they can be. | **Application Document 5.9 Design Development Report** and **Application Document 5.10 Design Approach Document** set out how the Projects delivers good design and complies with policy 4.7.10 and 4.7.11 of this NPS.<br>These documents explain that although the Project's primary purpose is to ensure the Project is delivered in a timely and efficient manner to meet Clean Power 2030 Action Plan (UK Government, 2025) requirements, as demonstrated through **Application Document 5.10 Design Approach Document** and **Application Documents 6.1 to 6.21 Environmental Statement**, environmental and socio-economic measures have been embedded into the design from the outset in order to avoid or reduce significant environmental effects where practicable, and stakeholder and community feedback has been integrated as part of the design process. National Grid has sought to achieve good design through the careful consideration of route corridors and application of defined design principles, along with the use of flexibility to respond to local constraints and opportunities, and the consideration of operational, safety and security requirements which the design has to satisfy. |
| 4.7.11 | In doing so, the Secretary of State should be satisfied that the applicant has considered both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located, any potential amenity benefits, and visual impacts on the landscape or seascape) as far as possible. | |
| 4.7.12 | In considering applications, the Secretary of State should take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements which the design has to satisfy. Many of the wider impacts of a development, such as landscape and environmental impacts, will be important factors in the design process. | |
| 4.7.13 | The Secretary of State should consider such impacts under the relevant policies in this NPS. Assessment of impacts must be for the stated design life of the scheme rather than a shorter time period | **Application Document 6.1 to 6.21 Environmental Statement** assesses impacts for the stated design life of the Project. |
| **4.10 Climate Change Adaptation and Resilience** | | |
| 4.10.5 | In certain circumstances, measures implemented to ensure a scheme can adapt to climate change may give rise to additional impacts, for example as a result of protecting against flood risk, there may be consequential impacts on coastal change. In preparing measures to support climate change adaptation, applicants should take reasonable steps to maximise the use of nature-based solutions alongside other conventional techniques. | **Application Document 6.19 Environmental Statement Chapter 19 Climate Change** presents an assessment of the likely significant effects of the Project on the climate and climate change effects that affect the Project and surrounding environment. In accordance with the IEMA Climate Change Resilience and Adaptation Guidance (Institute of Environmental Management and Assessment, 2020), and as set out in the methodology detailed in section 19.4 of the chapter, the assessment has evaluated the Project's vulnerability and resilience to relevant climate-related hazards and the potential risks these may pose to the Project. Government guidance and industry standard benchmarks has been used to inform the assessment in accordance with the EIA Regulations. The assessment has used the scenarios set out in the UK national carbon budgets (HM Government, 2021), to represent future emissions inventory scenarios for the UK.<br>Embedded mitigation measures which are intrinsic to and built into the design of the Project that have been integral in reducing and where possible avoiding impacts on climate change are set out in **Application Document 7.3 Register of Environmental Actions and Commitments** and include:<br>• The routeing and design of the Project including co-location and parallel alignment with existing overhead line infrastructure to avoid environmentally sensitive features and minimise land-take and habitat loss and associated emissions;<br>• Commitments made in **Application Document 7.2 Outline Code of Construction Practice** relating to construction such as the inclusion of strategically located temporary haul roads and access routes to improve construction efficiency and reduce vehicle movements; |
| 4.10.6 | Integrated approaches, such as looking across the water cycle, considering coordinated management of water storage, supply, demand, wastewater, and flood risk can provide further benefits to address multiple infrastructure needs, as well as carbon sequestration benefits. | |
| 4.10.7 | In addition to avoiding further GHG emissions when compared with more traditional adaptation approaches, nature-based solutions can also result in biodiversity benefits and net gain, as well as increasing absorption of carbon dioxide from the atmosphere. | |
| 4.10.8 | New energy infrastructure will typically need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. site flooding, limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires) impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure. | |

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| 4.10.9 | The ES should set out how the proposal will take account of the projected impacts of climate change, using government guidance and industry standard benchmarks such as the Climate Change Allowances for Flood Risk Assessments, Climate Impacts Tool, and British Standards for climate change adaptation, in accordance with the EIA Regulations. | |
| 4.10.10 | Applicants should assess the impacts on and from their proposed energy project across a range of climate change scenarios, in line with appropriate expert advice and guidance available at the time. | |
| 4.10.11 | Applicants should demonstrate that proposals have a high level of climate resilience built-in from the outset and should also demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum climate change scenario. These results should be considered alongside relevant research which is based on the climate change projections. | |
| 4.10.12 | Where energy infrastructure has safety critical elements, the applicant should apply a credible maximum climate change scenario. It is appropriate to take a risk-averse approach with elements of infrastructure which are critical to the safety of its operation. | |
| 4.10.13 | The Secretary of State should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change using the latest UK Climate Projections and associated research and expert guidance (such as the EA's Climate Change Allowances for Flood Risk Assessments or the Welsh Government's Climate change allowances and flood consequence assessments) available at the time the ES was prepared to ensure they have identified appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure, including any decommissioning period. | • The use of existing watercourse crossing points where practicable, reducing construction requirements and associated emissions;<br>• National Grid's commitment to delivering at least 10% Biodiversity Net Gain as set out in **Application Document 7.1 Biodiversity Net Gain Report**, contributing to enhanced carbon sequestration and climate resilience;<br>• The use of low carbon construction methods, transport and materials where practicable to minimise embodied carbon and emissions across the Project lifecycle;<br>• Designing the Project to be resilient to significant effects of climate change, including flood mitigation measures detailed in **Application Document 7.13 Flood Risk Assessment** and **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**; and<br>• Nature based solutions such as SuDS.<br>During the operational phase, the Project is considered to be at low risk of flooding from all sources assessed in **Application Document 7.13 Flood Risk Assessment** due to the mitigation measures built into its design. The Project is not anticipated to increase flood risk elsewhere during its operation (including maintenance) as any losses of floodplain storage would be compensated for. New impermeable surfaces would be very localised to pylon bases and rainfall runoff from these areas would be attenuated by surrounding reinstated natural ground and vegetation and would soak back into the ground. Further details on the proposals for compensatory storage have been included in **Application Document 7.13 Flood Risk Assessment**.<br>The Lifecycle GHG impact assessment set out in **Application Document 6.19 Environmental Statement Chapter 19 Climate Change** concludes that the Project would result in increased GHG emissions during construction and operation. In total, the potential GHG emissions of the Project are estimated to contribute to less than 0.1% of each respective UK carbon budget.. The effect of the Project on the global climate is deemed to be minor adverse and not significant, because the Project's GHG impacts would be fully consistent with applicable existing and emerging policy requirements and good practice design standards. Over its lifetime, the Project will be key for the UK to fulfil its net zero policy and move away from fossil fuels.<br>**Application Document 6.19 Environmental Statement Chapter 19 Climate Change** assesses the Project's GHG emissions in the context of the most up to date legally binding GHG reduction targets and carbon budgets, in line with IEMA GHG assessment guidance (Institute of Environmental Management and Assessment, 2022). |
| 4.10.15 | The Secretary of State should be satisfied that there are not features of the design of new energy infrastructure critical to its operation which may be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections, taking account of the latest credible scientific evidence on, for example, sea level rise (for example by referring to additional maximum credible scenarios – i.e. from the Intergovernmental Panel on Climate Change or EA) and that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime. | A sequential approach has been taken in siting the Project infrastructure. However, due to the linear nature of the Project, its large geographical scale, and its location, parts of the Order Limits necessarily encroach into areas with a medium or high likelihood of flooding.<br>During construction, parts of the Project are at medium and high risk of fluvial and tidal flooding due to temporary works being located within main river floodplains, namely the Humber, Ouse, Trent and Torne floodplains. These risks would be reduced through embedded mitigation and control and management measures which include managing these worksites in accordance with a Flood Warning and Evacuation Plan set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>During the operational phase, additional compensatory storage for any losses of fluvial floodplain storage (up to the 1% annual chance plus climate change flood event) is proposed as set out in **Application Document 7.13 Flood Risk Assessment** to ensure no detrimental effects on flood risk from rivers and sea or the functioning of flood defences. New impermeable surfaces would be very localised to pylon bases and rainfall runoff from these areas would be attenuated by surrounding reinstated vegetation and would soak back into the ground. |
| 4.10.16 | If any adaptation measures give rise to consequential impacts (for example on flooding, water resources or coastal change) the Secretary of State should consider the impact of the latter in relation to the application as a whole and the impacts guidance set out in Part 5 of this NPS. | |

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| 4.10.17 | Any adaptation measures should be based on the latest set of UK Climate Projections, the government's latest UK Climate Change Risk Assessment, when available, and in consultation with the EA's Climate Change Allowances for Flood Risk Assessments or the Welsh Government's Climate change allowances and flood consequence assessments. | Embedded mitigation, control and management and additional mitigation measures relating to climate resilience are set out in **Application Document 6.19 Environmental Statement Chapter 19 Climate Change, Application Document 7.13 Flood Risk Assessment and Application Document 6.11 Environmental Statement Chapter 11 Water Environment** and **Application Document 7.3 Register of Environmental Actions and Commitments**. These measures are based on the latest set of UK Climate Projections, UKCP18 and consideration has been had to the latest UK Climate Change Risk Assessment. **Application Document 7.13 Flood Risk Assessment** and **Application Document 6.11 Chapter 11 Water Environment** has taken account of the EA's Climate Change Allowances for Flood Risk Assessments in its assessment and consideration of mitigation measures. |
| 4.10.19 | Adaptation measures should be required to be implemented at the time of construction where necessary and appropriate to do so. However, where they are necessary to deal with the more extreme impacts of climate change, including credible maximum climate change scenarios, and that measure would have an adverse effect on other aspects of the project and/or surrounding environment (for example coastal processes), the Secretary of State may consider requiring the applicant to keep the need for the adaptation measure under review, and ensure that the measure could be implemented should the need arise, rather than at the outset of the development (for example increasing height of existing, or requiring new, sea walls). | Where pylons would be located in fluvial Flood Zone 3 (for events up to and including the 1% AEP plus climate change), loss of floodplain storage will be mitigated through the inclusion of compensatory storage within the Order Limits and will be implemented where necessary and appropriate to do so. This commitment is secured in **Application Document 7.3 Register of Environmental Actions and Commitments** which is in turn secured by the draft DCO. There are no other adaptation measures which are relevant to the Project that would need to be implemented should the need arise, rather than at the outset of the development. |
| **4.12 Pollution Control and Other Environmental Regulatory Regimes** | | |
| 4.12.7 | Applicants should understand what non-planning permits / consents the development will require and consider the timings for gaining these permissions alongside the timing for gaining the DCO. They should make early contact with relevant regulators, including EA or NRW and the MMO, to discuss their requirements for Environmental Permits and other consents, such as marine licences. Applicants can access enhanced (paid for) pre-application support before applying for an environmental permit. Enhanced pre-application advice is recommended for complex or significant developments to ensure applications contain the necessary assessments to address the risks associated with the proposed activity. Applicants can also explore options, such as submitting their application in stages through this route if the application is complex or uses novel technologies. Early engagement on the permissions required for the development is strongly advised and helps the management of these within the timescale for development. This is particularly advisable in circumstances where applicants have a number of permissions to obtain from the EA for their development. | **Application Document 5.4 Consents and Licenses Required Under Other legislation** is submitted with the application and sets out the required Environmental Permit applications and other licences and consents required for the Project and how and when these will be applied for during the DCO process. Engagement with the Environment Agency, Natural England, relevant Local Planning Authorities and relevant water supply company to discuss requirements is ongoing, as set out in **Application Document 5.8.1, 5.8.3, 5.8.5, 5.8.6, 5.8.7, 5.8.8, 5.8.11 and 5.8.19 Statements of Common Ground**. The Applicant has engaged with key stakeholders through paid pre-application services where relevant.<br>The **Application Document 5.5 Planning Statement** summarises the purpose and need for the Project, alongside the impacts, and concludes that the Project is an acceptable use of land, because, the clear and substantial benefits of the Project clearly outweigh any adverse impacts. None of the limited exceptions in Section 104(4)-(8) of the PA 2008 apply to the decision to be made by the SoS in respect of granting development consent for the Project. The presumption in favour of consent in NPS EN-1 sets out that these residual impacts are unlikely to outweigh the urgent need for this type of CNP infrastructure and that any tests set out in the NPS or other planning policy are to be treated as if they have been met. |
| 4.12.8 | Wherever appropriate, applicants should submit applications for Environmental Permits and other necessary consents at the same time as applying to the Secretary of State for development consent. | |
| 4.12.9 | In considering an application for development consent the Secretary of State should focus on whether the development itself is an acceptable use of the land or sea, and the impact of that use, rather than the control of processes, emissions or discharges themselves | |
| 4.12.10 | The Secretary of State should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction and biodiversity, will be properly applied and enforced by the relevant regulator. The Secretary of State should act to complement but not seek to duplicate those regulatory regimes, but without prejudice to the Secretary of State's duty to 'secure' compliance with the relevant regulatory requirements. | |

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| 4.12.13 | In considering the impacts of the project, the Secretary of State may wish to consult the regulator on matters relevant to the grant of, or conditions which would otherwise be included in, an environmental permit. The Secretary of State should be satisfied that development consent can be granted taking full account of environmental impacts. | **Application Document 5.4 Consents and Licenses Required Under Other legislation** identifies the consents and licences required for the Project and how these would be obtained. During discussions with relevant Statutory Environmental Bodies National Grid is not aware of any impediments to obtaining any additional environmental permits or consents required for the Project.<br>**Application Documents 6.1 to 6.22 Environmental Statement** has been submitted with the DCO application which takes full account of the environmental impacts. |
| 4.12.14 | Working in close cooperation with the EA or NRW and/or the pollution control authority, and other relevant bodies, such as the MMO, the SNCB, Drainage Boards, and water and sewerage undertakers, the Secretary of State should be satisfied, before consenting any potentially polluting developments, that:<br>• the relevant pollution control authority is satisfied that potential releases can be adequately regulated under the pollution control framework<br>• the effects of existing sources of pollution in and around the site are not such that the cumulative effects of pollution when the proposed development is added would make that development unacceptable, particularly in relation to statutory environmental quality limits | **Application Document 7.3 Register of Environmental Actions and Commitments** sets out the relevant pollution control consents and licences that are relevant to the Project, and how they will be secured.<br>**Application Document 6.12 Environmental Statement Chapter 12 Geology and Hydrology** sets out existing sources of pollution in and around the Project and concludes that there would not be any significant construction impacts from exposure to existing contamination for human health receptors, groundwater and groundwater receptors or geo-conservation. **Application Document 6.21 Environmental Statement Chapter 21 Intra-Project Cumulative Effects** concludes that when the Project is added, these effects would not be significant, meaning the Project would not be unacceptable in relation to statutory environmental quality limits.<br>There is no evidence that the necessary operational pollution control permits of licences or other consents, set out in **Application Document 5.4 Consents and Licenses Required Under Other legislation** would not subsequently be granted. |
| 4.12.15 | The Secretary of State should not refuse consent on the basis of pollution impacts unless there is good reason to believe that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted. On this basis, it is reasonable for the Secretary of State to consider residual amenity issues only when considering whether the development itself is an acceptable use of the land or sea, and on the impacts of that use. | |
| **4.13 Safety** | | |
| 4.13.5 | Applicants should consult with the HSE on matters relating to safety. | National Grid has consulted with the HSE. In its response to statutory consultation, the HSE considered matters within its remit and identified that the Project components do appear to cross the Consultation Zones of several Major Accident Hazard (MAH) sites and MAH pipelines. The HSE advised that National Grid should make contact with the operators of MAH sites to inform an assessment of whether or not the Project is vulnerable to a possible major accident.<br>The requirements of the Control of Major Accident Hazards (COMAH) Regulations do not apply to high voltage electricity works of the type proposed as part of the Project, however National Grid has and continues to engage with the relevant site operators of MAH sites and will seek to agree suitable protective measures throughout the consent process and post-consent during detailed design and construction. The assessment of major accidents and disasters was agreed to be scoped out of the Environmental Statement. |
| 4.13.8 | The Secretary of State should be satisfied that a safety assessment has been prepared, where required, and that the Competent Authority has raised no safety objections. | |
| **4.14 Hazardous Substances** | | |
| 4.14.5 | Applicants must consult the HSA and HSE at pre-application stage if the project is likely to need hazardous substances consent. Hazardous substances consents are a part of the planning regime which contributes to public safety. | It is considered that the Project does not require Hazardous Substance Consent as it does not involve the presence of hazardous substances at or above controlled quantities for any hazard group.<br>In its response to statutory consultation, the HSE considered matters within its remit and identified that the Order Limits detailed in the Section 42 Scoping Report does appear to cross the Consultation Zones of several MAH sites and MAH pipelines. The HSE advised that National Grid should make contact with the operators of MAH sites to inform an assessment of whether or not the Project is vulnerable to a possible major accident. |
| 4.14.6 | HSE sets a consultation distance around every site with hazardous substances consent and notifies the relevant LPAs. The applicant should therefore consult the LPA at pre-application stage to identify whether its proposed site is within the consultation distance of any site with hazardous substances consent and, if so, should consult the HSE for its advice on locating the particular development on that site. Where a hazardous substance consent has been deemed to be granted, the developer is required to send the relevant HSA any information required by them for the purposes of a register. | |

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| | | In its response to the HSE, National Grid confirmed that the requirements of the COMAH Regulations do not apply to high voltage electricity works of the type proposed as part of the Project, however National Grid has and continues to consult with the relevant site operators of MAH sites and pipelines. |
| **4.15 Common Law Nuisance and Statutory Nuisance** | | |
| 4.15.5 | At the application stage of an energy NSIP, possible sources of nuisance under section 79(1) of the EPA 1990 and how they may be mitigated or limited should be identified by the applicant so that appropriate requirements can be included in any subsequent order granting development consent (see Section 5.7 on dust, odour, artificial light etc. and Section 5.12 on noise and vibration). | **Application Document 5.3 Statement of Statutory Nuisance** has been submitted with the application for development consent.<br>**Application Document 7.2 Outline Code of Construction Practice** (CoCP) includes good practice measures to avoid or reduce the effects of dust, lighting, noise and vibration. These measures would reduce impacts that could otherwise result in nuisance during construction. The development authorised by the DCO must be undertaken in accordance with the CoCP, pursuant to Requirement 4 of **Application Document 3.1 Draft Development Consent Order**. National Grid and its contractor would carry out all work in accordance with the CoCP during the construction of the Project unless otherwise agreed with the relevant planning authority.<br>**Application Document 5.3 Statement of Statutory Nuisance** assesses possible sources of nuisance under section 79(1) of the Environmental Protection Act (EPA) 1990 (HM Government, 1990). With the good practice measures in place, no breach of section 79(1) of the EPA 1990 is expected as a result of the Project. |
| 4.15.6 | At the application stage of an energy NSIP, possible sources of nuisance under section 79(1) of the EPA 1990 and how they may be mitigated or limited should be considered by the Secretary of State so that appropriate requirements can be included in any subsequent order granting development consent (see Section 5.7 on dust, odour, artificial light etc. and Section 5.12 on noise and vibration). | |
| 4.15.7 | The Secretary of State should note that the defence of statutory authority is subject to any contrary provision made by the Secretary of State in any particular case in a Development Consent Order (section 158(3) of the Planning Act 2008). Therefore, subject to Section 5.7 and Section 5.12, the Secretary of State can disapply the defence of statutory authority, in whole or in part, in any particular case, but in so doing should have regard to whether any particular nuisance is an inevitable consequence of the development. | |
| **4.16 Security Considerations** | | |
| 4.16.6 | Where national security implications have been identified, the applicant should consult with relevant security experts from NPSA, ONR (for civil nuclear) and/or DESNZ to ensure security measures have been adequately considered in the design process and that adequate consideration has been given to the management of security risks. | No national security implications have been identified. Therefore, National Grid has not consulted with the National Protective Security Authority, Office for Nuclear Regulation or the Department for Energy Security and Net Zero in relation to security.<br>The Project consulted with the UK Health Security Agency as the application is likely to involve chemicals. Management plans are submitted with the Application which secure the implementation of measures during construction and operation which would seek to avoid or reduce risks relating to pollution and emissions, including **Application Document 7.2 Outline Code of Construction Practice, Application Document 7.3 Register of Environmental Actions and Commitments, Application Document 7.4 Outline Construction Traffic Management Plan, and Application Document 7.7 Outline Noise and Vibration Management Plan.** No significant effects are anticipated in relation to pollution or health as set out in **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** and **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism**.<br>As set out in **Application Document 6.5.A2 Environmental Statement Appendix 5.5.A2 Scoping Opinion August**, it was agreed that the potential for major accidents and disasters as a result of the Project can be mitigated or reduced by the processes and standards in place and that the Project is also unlikely to generate any significant effects on the environment if a major accident or disaster were to occur. This was therefore scoped out of the EIA.<br>As part of the statutory consultation carried out, the Health and Safety Executive (HSE) was consulted with. In its response the HSE identified that the Project appears to cross the Consultation Zones of several Major Accident Hazard (MAH) sites and MAH pipelines. The HSE advised that the Applicant should make contact with the operators of MAH sites to inform an assessment of whether or not the Project is vulnerable to a possible major accident. In its response to the HSE, National Grid confirmed that the requirements of the Control of Major Accident Hazards (COMAH) Regulations do not apply to high voltage electricity works of the type proposed as part of the Project, |

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| | | however National Grid has and continues to consult with the relevant site operators of MAH sites and pipelines.<br>National Grid consulted with the Ministry of Defence (MOD) Defence Infrastructure Organisation (DIO) who confirmed that the proposed development area of the Project occupies the statutory safeguarding zones that surround the East 1 Wide Area Multilateration (WAM) Network which contributes to aviation safety by feeding into the air traffic management system in eastern England. The proposed development area is also within Military Low Flying Area's (LFA) 06 and 11.<br>National Grid has engaged with the MOD DIO by providing detailed Project design information including updates to overhead line alignments and indicative tower heights which allowed for the MOD DIO to assess the potential impacts on the identified assets. With respect of the interactions of the Project with the Clarborough to Belmont and the Clarborough to Waddington WAM Microwave Links, engagement with the MOD DIO and assessment by National Grid is on-going to understand the potential Project impacts on the military communications infrastructure which will be informed through the provision of detailed Project design information. To ensure the proposed overhead line does not physically affect the WAM networks the MOD DIO has requested requirements to be included within the draft Development Consent Order. The inclusion of such requirements within the DCO is subject to on-going assessment work by National Grid.<br>In relation to the impact of the Project on Military Low Flying Areas 06 and 11 the MOD DIO has requested that the Project provide information on the construction of new pylons and any removal or modifications to the siting of existing pylons so aviation chart data can be updated. In addition, the Project will provide MOD DIO with information about where crane deployments will occur to maintain the safety of military aircraft engaging in low flying training activities as requested by the MOD DIO who have requested that requirements be included within the draft Development Consent Order to secure this. The inclusion of such requirements within the DCO is subject to on-going assessment work by National Grid. |
| **Generic Impacts** | | |
| **5.2 Air Quality and Emissions** | | |
| 5.2.3 | For many air pollutants there is not a threshold below which there is no health impact so it is important that energy infrastructure schemes consider not just how a scheme may impact statutory air quality limits, objectives or targets but also measures to mitigate all emissions in order to minimise human exposure to air pollution, especially for those who are more susceptible to the impacts of poor air quality. | **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** presents the assessment of the likely significant air quality effects that could result from the Project. During the construction phase, construction machinery and vehicles could generate dust particularly through earthworks activities. Machinery and construction vehicles would also emit exhaust emissions that may lead to impacts on air quality. A construction dust risk assessment has been undertaken and is set out in **Application Document 6.15.A2 Environmental Statement Appendix 15.2 Construction Dust Methodology and Assessment**. The assessment confirms that with the implementation of the proposed standard mitigation measures, the effects of construction on air quality in regard to dust, vehicle emissions and Non-Road Mobile Machinery (NRMM) emissions, effects are anticipated to be not significant<br>There is limited potential for the Project to generate dust and emissions during the operational phase, due to the limited activities associated with inspection and maintenance, therefore, this has been scoped out of the assessment. |
| 5.2.4 | In addition, a particular effect of air emissions from some energy infrastructure may be eutrophication, which is the excessive enrichment of nutrients in the environment. Eutrophication from air pollution results mainly from emissions of NOx and ammonia. The main emissions from energy infrastructure are from generating stations. Eutrophication can affect plant growth and functioning, altering the competitive balance of species and thereby damaging biodiversity. In aquatic ecosystems it can cause changes to algal composition and lead to algal blooms, which remove oxygen from the water, adversely affecting plants and fish. The effects on ecosystems can be short term or irreversible and | **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** concludes that construction vehicle emissions, construction plant and equipment emissions as a result of the Project have been determined as not significant, given the negligible change in concentrations relative to AQALs at all reported ecological receptors, for all pollutants assessed. Therefore, no eutrophication effects are anticipated as a result of the Project. |

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| | can have a large impact on ecosystem services such as pollination, aesthetic services and water supply | |
| 5.2.8 | Where the project is likely to have adverse effects on air quality the applicant should undertake an assessment of the impacts of the proposed project as part of the ES. | An air quality assessment has been undertaken and is presented in **Application Document 6.15 Environmental Statement Chapter 15 Air Quality**. |
| 5.2.9 | The ES should describe:<br>• existing air quality concentrations and the relative change in air quality from existing levels;<br>• any significant air quality effects, mitigation action taken and any residual effects, distinguishing between the project stages and taking account of any significant emissions from any road traffic generated by the project;<br>• the predicted absolute emissions, concentration change and absolute concentrations as a result of the proposed project, after mitigation methods have been applied; and<br>• any potential eutrophication impacts | The air quality assessment presented in **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** assesses the likely air quality effects that would result from the Project and considers the existing baseline conditions and likely changes and effects to air quality levels during the construction phase. The Project has been designed following the mitigation hierarchy, as far as practicable, to, in the first instance, avoid or reduce air quality impacts and effects through the process of design development. This has included sensitive routeing and siting of infrastructure and temporary works. An assessment of construction dust impacts on local amenity and ecological sites is also provided as detailed in **Application Document 6.15.A2 Environmental Statement Appendix 15.2 Construction Dust Methodology and Assessment**.<br>The assessment confirms that with the implementation of the proposed standard mitigation measures, the effects of construction on air quality in regard to dust, vehicle emissions and NRMM emissions, are anticipated to be not significant.<br>As set out in the Scoping Report (**Application Document 6.5.A1 Environmental Statement Appendix 5.1 Environmental Impact Assessment Scoping Report**) and agreed within the Scoping Opinion (**Application Document 6.5.A2 Environmental Statement Appendix 5.2 Scoping Opinion**) the operational phase of the Project will not result in any significant impact and has been scoped out and as such no further assessment has been undertaken.<br>Following the implementation of design mitigation and measures proposed in **Application Document 7.2 Outline Code of Construction Practice**, **Application Document 7.3 Register of Environmental Actions and Commitments**, and **Application Document 7.4 Outline Construction Traffic Management Plan**, the assessment of air quality concludes that during construction no significant effects on air quality from vehicle emissions are anticipated.<br>**Application Document 6.15 Environmental Statement Chapter 15 Air Quality** concludes that construction vehicle emissions, construction plant and equipment emissions as a result of the Project have been determined as not significant, given the negligible change in concentrations relative to AQALs at all reported ecological receptors, for all pollutants assessed. Therefore, no eutrophication effects are anticipated as a result of the Project. |
| 5.2.10 | In addition, applicants should consider the Environment Targets (Fine Particulate Matter) (England) Regulations 2023 and associated Defra guidance | **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** has considered this guidance. |
| 5.2.11 | Defra publishes future national projections of air quality based on estimates of future levels of emissions, traffic, and vehicle fleet. Projections are updated as the evidence base changes and the applicant should ensure these are current at the point of an application. The applicant's assessment should be consistent with this but may include more detailed modelling and evaluation to demonstrate local and national impacts. If an applicant believes they have robust additional supporting evidence, to the extent they could affect the conclusions of the assessment, they should include this in their representations to the Examining Authority along with the source. | Current and future Defra air quality background concentrations as well as local air quality monitoring have been used in the assessment of air quality effects in **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** to determine if the Project is likely to have significant adverse impacts on air quality. |
| 5.2.12 | Where a proposed development is likely to lead to a breach of any relevant statutory air quality limits, objectives or targets, or affect the ability of a non-compliant area to achieve compliance within the timescales set out in the most recent relevant air quality plan/strategy at the time of the decision, the applicant should work with the relevant authorities to secure appropriate mitigation measures to ensure that those statutory limits, objectives or targets are not breached. | As set out in **Application Document 6.15 Environmental Statement Chapter 15 Air Quality**, the assessment of air quality has considered whether the Project is likely to lead to a breach of the relevant air quality objectives or affect the ability of a non-compliant area to achieve compliance. The Project would not lead to a breach of any relevant statutory air quality thresholds or affect the ability of a noncompliant area to achieve compliance. |

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| 5.2.13 | The Secretary of State should consider whether mitigation measures are needed both for operational and construction emissions over and above any which may form part of the project application. A construction management plan may help codify mitigation at this stage. In doing so the Secretary of State should have regard to the Air Quality Strategy in England, or the Clean Air Plan for Wales in Wales, or any successors to these and should consider relevant advice within Local Air Quality Management guidance and PM2.5 targets guidance. | **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** concludes that there are no anticipated significant effects on air quality as a result of the Project. Mitigation measures have been proposed where required and are summarised in section 15.8 of **Application Document 6.15 Environmental Statement Chapter 15 Air Quality**.<br>**Application Document 7.2 Outline Code of Construction Practice**, **Application Document 7.3 Register of Environmental Actions and Commitments**, and **Application Document 7.4 Outline Construction Traffic Management Plan**, further set out the mitigation measures and commitments required to mitigate against air quality effects of the Project, and have been secured by **Application Document 3.1 Draft Development Consent Order**. |
| 5.2.15 | Many activities involving air emissions are subject to pollution control. The considerations set out in Section 4.12 on the interface between planning and pollution control therefore apply. The Secretary of State must also consider duties under other legislation including duties under the Environment Act 2021 in relation to environmental targets and have regard to policies set out in the government's Environmental Improvement Plan. | Section 15.2 of **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** sets out that the Project has considered a range of relevant legislation including the Environment Act 2021 and that the Project has had regard to the government's Environmental Improvement Plan. |
| 5.2.16 | The Secretary of State should give air quality considerations substantial weight where a project would lead to a deterioration in air quality. This could for example include where an area breaches any national air quality limits or statutory air quality objectives. However, air quality considerations will also be important where substantial changes in air quality levels are expected, even if this does not lead to any breaches of statutory limits, objectives or targets. | **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** provides an assessment of the likely effects on air quality that would result from the Project and considers the baseline conditions and the likely changes and effects to air quality levels during the construction phase. The assessment confirms there would not be a deterioration in air quality or substantial changes in air quality levels and therefore significant adverse effects on air quality are not anticipated as a result of the Project.<br>**Application Document 6.15 Environmental Statement Chapter 15 Air Quality** concludes that no emissions arising from the Project would breach any national air quality limits or statutory air quality objectives. During operation, vehicle numbers are expected to be very low with the only anticipated emissions being from maintenance vehicles which are likely to be negligible and sporadic with no quantifiable effect on local air quality. |
| 5.2.17 | The Secretary of State should give air quality considerations substantial weight where a project is proposed near a sensitive receptor site, such as an education or healthcare facility, residential use or a sensitive or protected habitat. | The assessment of air quality in **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** has assessed the impact of the Project on any sensitive receptors. Sensitive receptors have been considered following Institute of Air Quality Management guidance which sets out the approach for identifying high, medium and low sensitivity receptors.<br>The construction traffic and NRMM assessment has treated all sensitive receptors equally. The assessment concluded that, with the proposed mitigation measures in place the annual mean pollutant concentrations for NO2, PM10 and PM2.5 which were predicted at 59 sensitive human receptors all resulted in a predicted negligible magnitude of change, and therefore effects are considered to not be significant.<br>The Project may require the use of generators at construction compounds. However, there are no sensitive receptors within 200 m of construction compounds and as such no significant effects are anticipated. |
| 5.2.18 | Where a project is proposed near to a sensitive receptor site for air quality, if the applicant cannot provide justification for this location, and a suitable mitigation plan, the Secretary of State should refuse consent. | |
| 5.2.19 | In all cases, the Secretary of State must take account of any relevant statutory air quality limits, objectives and targets. If a project will lead to non-compliance with a statutory limit, objective or target the Secretary of State should refuse consent. | As concluded in **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** the Project would not lead to noncompliance with a statutory limits, objective or target. |

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| **5.3 Greenhouse Gas Emissions** | | |
| 5.3.3 | As discussed in Part 2, energy infrastructure plays a vital role in decarbonisation. All steps should be taken to reduce and mitigate climate change impacts, including by improving resource and energy efficiency in the construction, operation, and decommissioning of energy infrastructure where possible. However, it is accepted that there will be some residual emissions from energy infrastructure, particularly during the economy wide transition to net zero, and potentially beyond. | **Application Document 6.19 Environmental Statement Chapter 19 Climate Change** includes a Lifecycle GHG impact assessment which accords with the requirements set out in paragraph 5.3.4. A more detailed breakdown of GHG emissions is provided in **Application Document 6.19.A4 Environmental Statement Appendix 19.4 Greenhouse Gas Reduction Strategy**.<br>Embedded mitigation measures which are intrinsic to and built into the design of the Project that have been integral in reducing and where possible avoiding impacts on climate change include:<br>• The routeing and design of the Project including co-location and parallel alignment with existing overhead line infrastructure to avoid environmentally sensitive features and minimise land-take and habitat loss and associated emissions;<br>• Commitments made in **Application Document 7.2 Outline Code of Construction Practice** relating to construction such as the inclusion of strategically located temporary haul roads and access routes to improve construction efficiency and reduce vehicle movements;<br>• Climate change commitments made in **Application Document 7.3 Register of Environmental Actions and Commitments** including sourcing local materials where reasonably practicable to minimise GHG emissions;<br>• The use of existing watercourse crossing points where practicable, reducing construction requirements and associated emissions;<br>• National Grid's commitment to delivering at least 10% Biodiversity Net Gain, contributing to enhanced carbon sequestration and climate resilience;<br>• The use of low carbon construction methods, transport and materials where practicable to minimise embodied carbon and emissions across the Project lifecycle; and<br>• Designing the Project to be resilient to significant effects of climate change, including flood mitigation measures detailed in **Application Document 7.13 Flood Risk Assessment** and **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**.<br>The Lifecycle GHG impact assessment set out in **Application Document 6.19 Environmental Statement Chapter 19 Climate Change** concludes that the Project would result in increased GHG emissions during construction and operation. In total, the potential GHG emissions of the Project are estimated to contribute to less than 0.1% of each respective UK carbon budget. The effect of the Project on the global climate is deemed to be minor adverse and not significant, because the Project's GHG impacts would be fully consistent with applicable existing and emerging policy requirements and good practice design standards. Over its lifetime, the Project will be key for the UK to fulfil its net zero policy and move away from fossil fuels. |
| 5.3.4 | All proposals for energy infrastructure projects should include a GHG assessment as part of their ES (See Section 4.3). This should include:<br>• A whole life GHG assessment showing construction, operational and decommissioning GHG impacts, including impacts from change of land use.<br>• An explanation of the steps that have been taken to drive down the climate change impacts at each of those stages.<br>• Measurement of embodied GHG impact from the construction stage.<br>• How reduction in energy demand and consumption during operation has been prioritised in comparison with other measures.<br>• How operational emissions have been reduced as much as possible through the application of BAT for that type of technology.<br>• Calculation of operational energy consumption and associated carbon emissions.<br>• Whether and how any residual GHG emissions will be (voluntarily) offset or removed using a recognised framework.<br>• Where there are residual emissions, the level of emissions and the impact of those on national and international efforts to limit climate change, both alone and where relevant in combination with other developments at a regional or national level, or sector level, if sectoral targets are developed. | |
| 5.3.5 | A GHG assessment should be used to drive down GHG emissions at every stage of the proposed development and ensure that emissions are minimised as far as possible for the type of technology, taking into account the overall objectives of ensuring our supply of energy always remains secure, reliable and affordable, as we transition to net zero. | **Application Document 6.19 Environmental Statement Chapter 19 Climate Change** and **Application Document 6.19.A4 Environmental Statement Appendix 19.4 Greenhouse Gas Reduction Strategy** set out in detail the GHG emissions predicted for the Project and in turn the strategy (through embedded, control and management measures) to drive down GHG emissions at every stage of the Project to ensure emissions are minimised as far as practicable, taking into account the overall objectives of ensuring the supply of energy always remains secure, reliable and affordable, as the transition to net zero occurs.<br>**Application Document 6.19.A4 Environmental Statement Appendix 19.4 Greenhouse Gas Reduction Strategy** sets out a range of further measures that could be considered on the Project in relation to GHG emissions. These have not been taken into account in the residual effects assessment presented in **Application Document 6.19 Environmental Statement Chapter 19 Climate Change**. |
| 5.3.6 | Applicants should look for opportunities within the proposed development to embed nature-based or technological solutions to mitigate or offset the emissions of construction and decommissioning. | |
| 5.3.7 | Steps taken to minimise and offset emissions should be set out in a GHG Reduction Strategy, secured under the Development Consent Order. The GHG Reduction Strategy should consider the creation and preservation of carbon stores and sinks including through woodland creation, hedgerow creation and restoration, peatland restoration and through other natural habitats. | |

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| 5.3.8 | The Secretary of State must be satisfied that the applicant has as far as possible assessed the GHG emissions of all stages of the development. | Outline Management plans have been prepared including **Application Document 7.4 Outline Construction Traffic Management Plan**, **Application Document 7.5 Outline Soil Management Plan**, and **Application Document 7.8 Outline Landscape and Ecology Management Plan** which contain measures that either directly or indirectly reduce GHG emissions. Detailed versions of these plans will be secured by **Application Document 3.1 Draft Development Consent Order**. |
| 5.3.9 | The Secretary of State should be content that the applicant has taken all reasonable steps to reduce the GHG emissions of the construction and decommissioning stage of the development. | |
| 5.3.10 | The Secretary of State should give appropriate weight to projects that embed nature-based or technological processes to mitigate or offset the emissions of construction and decommissioning within the proposed development. However, in light of the vital role energy infrastructure plays in the process of economy wide decarbonisation, the Secretary of State must accept that there are likely to be some residual emissions from construction and decommissioning of energy infrastructure. | |
| **5.4 Biodiversity and Geological Conservation** | | |
| 5.4.4 | The highest level of biodiversity protection is afforded to sites identified through international conventions. The Habitats Regulations set out sites for which an HRA will assess the implications of a plan or project, including Special Areas of Conservation and Special Protection Areas. | **Application Document 5.2 Habitats Regulations Assessment Report** has been prepared for the Project which assesses the impacts of the Project on sites identified through international conventions, and those given the same protection. The assessment to inform the Appropriate Assessment in the HRA Report concludes that the Project (either alone or in-combination with other plans or projects) would not result in an adverse effect on the integrity of a European site following the implementation of mitigation. Embedded, control and management and additional mitigation measures that are proposed to minimise or avoid likely significant effects are set out in the HRA Report, as well as where relevant in **Application Document 7.3 Register of Environmental Actions and Commitments, Application Document 7.2 Outline Code of Construction Practice, Application Document 7.8 Outline Landscape and Ecology Management Plan**, **Application Document 7.5 Outline Soil Management Plan, Application Document 7.7 Outline Noise and Vibration Management Plan,** and these documents will be secured by **Application Document 3.1 Draft Development Consent Order**. |
| 5.4.5 | As a matter of policy, the following should be given the same protection as sites covered by the Habitats Regulations and an HRA will also be required:<br>• Potential Special Protection Areas and possible Special Areas of Conservation;<br>• Listed or proposed Ramsar sites; and<br>• Sites identified, or required, as compensatory measures for adverse effects on Special Protection Areas, Special Areas of Conservation, and any of the other sites covered by this paragraph. | |
| 5.4.7 | Many SSSIs are also designated as sites of international importance and will be protected accordingly. Those that are not, or those features of SSSIs not covered by an international designation, should be given a high degree of protection. Most National Nature Reserves are notified as SSSIs. | Following the implementation of embedded, control and management, and additional mitigation measures, **Application Document 6.8 Environmental Statement Chapter 8 Ecology** and **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** conclude that the Project would avoid significant adverse effects on all international and national statutory designated sites for nature conservation including SSSIs. This has been achieved as the Project has been designed from the outset following the mitigation hierarchy and the Holford guidance to avoid impacts where possible, as demonstrated in **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered**, **Application Document 7.17 Strategic Options Report Including Needs Case**, and **Application Document 5.9 Design Development Report**. |
| 5.4.8 | Development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits (including need) of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs. | |
| 5.4.13 | Sites of regional and local biodiversity and geological interest, which include Regionally Important Geological Sites, Local Nature Reserves and Local Wildlife Sites, are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery. They can also provide wider benefits including public access (where agreed), climate mitigation and helping to tackle air pollution. | Following the implementation of embedded, control and additional mitigation measures, **Application Document 6.8 Environmental Statement Chapter 8 Ecology and Application Document 6.9 Environmental Statement Chapter 9 Ornithology** conclude that the Project, based on the current design as set out in **Application Document 6.4 Chapter 4 Description of the Project**, avoids significant adverse impacts on all international and national and local statutory designated sites for nature conservation including SSSI's, non-statutory designated sites, priority habitats, important hedgerows and other terrestrial habitats. This has been achieved by following the mitigation hierarchy with the design process, and in accordance with the Holford guidance, to avoid impacts where possible<br>It is noted however that if the LoD are used during construction near Jillywood Lane LWS, then habitats could be impacted in two locations. This would result in a significant adverse effect because |

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| | | the LWS has been recorded by the Project as containing Woodland with Characteristics of Ancient Woodland. Therefore, as a worst case, this habitat is considered irreplaceable. If the LoD is used, and trees are required to be removed at Jillywood Lane LWS, mitigation set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments** would ensure that any trees removed will not be removed to below ground level and not grubbed out to reduce the impact to soil and ground flora. Compensation would also be provided via new trees to be planted in proposed mitigation planting areas, outside the LWS, which are described in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and shown in **Application Document 6.4.F1 Figure 4.1 Proposed Project Design**. Full details of compensation planting and other potential compensatory measures would be developed during the detailed design of the Project. Compensatory measures could include phased tree surgery, genetic conservation and commitments to maintain and monitor compensation areas for a minimum of 30 years.<br>In accordance with paragraph 5.4.54 of NPS EN-1, the need for new national significant infrastructure means that local designations such as this should not be used in themselves to refuse development consent. |
| 5.4.15 | Irreplaceable habitats are habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. | **Application Document 6.8 Environmental Statement Chapter 8 Ecology** sets out that only one area of designated ancient woodland (recorded on the AWI) is located within the Order Limits; Treswell Wood Ancient Woodland lies immediately adjacent to/just within the Order Limits, however, this is only a small overlap within the BNG Opportunity Area and there would be no loss or deterioration of this woodland as a result of the Project. The areas of ancient woodland that are present within the Order Limits and wider study area are shown on **Application Document 6.8.F2 Environmental Statement Figure 8.2 Nature Conservation Non-Statutory Designated Sites and Priority Habitat within 2 km**. |
| 5.4.16 | Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Keepers of Time, the government's policy for ancient and native trees and woodlands in England sets out the government's commitment to maintain and enhance the existing area of ancient woodland, maintain and enhance the existing resource of known ancient and veteran trees, excluding natural losses from disease and death, and to increase the percentage of ancient woodland in active management. Ancient and veteran trees found outside ancient woodland are also particularly valuable. Other types of irreplaceable habitats include blanket bog, limestone pavement, coastal sand dunes, spartina salt marsh swards, mediterranean saltmarsh scrub, and lowland fen. | As detailed in **Application Document 6.8.A3 Appendix 8.3 Habitat Survey Report, Application Document 6.8.A4 Appendix 8.4 Botanical Report and shown on Figure A8.4.3 Woodland with Characteristics of Ancient Woodland**, a review of historic mapping identified eight areas of woodland inside the Order Limits, which are not currently recorded on the Ancient Woodland Inventory or the revised counties dataset but for which there is evidence that they that would potentially qualify as ancient woodland due to their age (woodland that has existed continuously since 1600). These Project identified features are termed Woodlands with Characteristics of Ancient Woodland, and are listed below:<br>• Woodland at Jillywood Lane, which forms part of Jillywood Lane LWS, in Route Section A;<br>• Socken Wood, in Route Section A;<br>• Brantingham (small wood adjacent to Ellerker Road), in Route Section A;<br>• South of Dog Horse Plantation, In Route Section D;<br>• Part of Dixon Wood, in Route Section D;<br>• Part of Wood Farm, in Route Section E;<br>• Saundby Park Wood, in Route Section E; and<br>• Pigeon Field, in Route Section F.<br>There are no ancient or veteran trees (shown in the Woodland Trust's Ancient Tree Inventory) recorded within or up to 50 m from the Order Limits. However, arboricultural surveys carried out between July 2024 and February 2026 recorded 37 veteran trees and one veteran tree group within a 30 m study area of the Order Limits (not including the FLL mitigation area). Veteran trees are recorded and assessed in **Application Document 7.14 Arboricultural Impact Assessment: Appenxid E Veteran Tree Assessment Methodology.**<br>**Application Document 6.8 Environmental Statement Chapter 8 Ecology, Application Document 7.14 Arboricultural Impact Assessment and Application Document 7.14** |

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| | | **Arboricultural Impact Assessment: Appendix E Veteran Tree Assessment Methodology** set out the effects of the Project on trees and hedgerow, including irreplaceable habitats. Section 6.4 and 7 of the Planning Statement sets out how the Project complies with the NPS EN-1 policy relating to irreplaceable habitats. |
| 5.4.17 | Many individual species receive statutory protection under a range of legislative provisions. Other species and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales, as well as for their continued benefit for climate mitigation and adaptation and thereby requiring conservation action. | **Application Document 6.8 Environmental Statement Chapter 8 Ecology and Application Document 6.9 Environmental Statement Chapter 9 Ornithology** sets out a list of the species and habitats that are relevant to the Project, as well as their importance, and the potential effects of the Project on them. They also clearly set out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats.<br>Following the implementation of embedded, control and additional mitigation measures, **Application Document 6.8 Environmental Statement Chapter 8 Ecology** and **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** conclude that the Project, based on the current design as set out in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project**, avoids residual significant adverse impacts on all international and national and local statutory designated sites for nature conservation including SSSIs, non-statutory designated sites, priority habitats, important hedgerows and other terrestrial habitats.. This has been achieved by following the mitigation hierarchy with the design process, and in accordance with the Holford Guidance, to avoid impacts where possible.<br>It should be noted that this conclusion is based on the assessment surveys that have been undertaken thus far for the Project. Additional 2026 surveys are currently continuing, and any additional assessment results would be provided in addendum reports following submission of the DCO.<br>**Application Document 6.8 Environmental Statement Chapter 8 Ecology** concludes that there would be a residual significant adverse effect on Yellow birds-nest, which is a wildflower, due to the permanent loss of plants due to pylon working areas (pylons 4ZQ78 and 4ZQ77), access, stringing works, and overhead line clearance (between 4ZQ78 and 4ZQ76) requiring felling and management of trees within woodland at or in the vicinity of the top of Bilks Hill, and therefore the associated fungal network that the plant is dependent on. As noted above and in Table 8.21 of **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, mitigation is proposed to ensure there would be no direct effects or encroachment on yellow bird's nest, however residual significant effects remain due to impacts to the fungal network that the flower relies on. There would be no other significant adverse effects on any other species or protected species, including all bird species.<br>It is also noted that if the LoD are used during construction near Jillywood Lane LWS, then habitats could be impacted in two locations. This would result in a significant adverse effect because the LWS has been recorded by the Project as containing Woodland with Characteristics of Ancient Woodland. Therefore, as a worst case, this habitat is considered irreplaceable. If the LoD is used, and trees are required to be removed at Jillywood Lane LWS, mitigation set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments** would ensure that any trees removed will not be removed to below ground level and not grubbed out to reduce the impact to soil and ground flora. Compensation would also be provided via new trees to be planted in proposed mitigation planting areas, outside the LWS, which are described in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and shown in **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.<br>A significant residual adverse effect is also anticipated on parts Woodlands with Characteristics of Ancient Woodland, but are not included on the Ancient Woodland Inventory (AWI), as well as on one veteran tree, if the LoD are used. Section 6.4 and 7 of the Planning Statement sets out how the Project complies with the NPS EN-1 policy relating to irreplaceable habitats. |
| 5.4.18 | Where the development is subject to EIA, the applicant should ensure that the ES clearly sets out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance (including those outside England and Wales), on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats. | |

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| 5.4.20 | The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests. | **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** and **Application Document 5.2 Habitats Regulations Assessment Report** identify the embedded mitigation measures incorporated into the Project design to conserve and enhance biodiversity and geological conservation interests. These include sensitive routeing and siting to avoid and reduce impacts as far as practicable, as well as mitigation to provide habitat for water vole and otter, and planting to extend existing habitats and provide links between them.<br>National Grid has committed to deliver at least 10% Biodiversity Net Gain (BNG) with wider environmental and societal benefits. The Project will achieve a minimum of 10% BNG (through on-site and off-site BNG) and has undertaken a BNG assessment (based on the Statutory Biodiversity Metric calculation tool (Defra, 2026)) which is presented in **Application Document 7.1 Biodiversity Net Gain Report**. |
| 5.4.22 | As set out in Section 4.7, the design process should embed opportunities for nature inclusive design. Energy infrastructure projects have the potential to deliver significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains (see Section 4.6 on Environmental and Biodiversity Net Gain). The scope of potential gains will be dependent on the type, scale, and location of each project. | |
| 5.4.23 | The design of energy NSIP proposals will need to consider the movement of mobile/migratory species such as birds, fish and marine and terrestrial mammals and their potential to interact with infrastructure. As energy infrastructure could occur anywhere within England and Wales, both inland and onshore and offshore, the potential to affect mobile and migratory species across the UK and more widely across Europe (transboundary effects) requires consideration, depending on the location of development. Applicants should consider relevant plan policies in marine plans in England. | **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** and **Application Document 5.2 Habitats Regulations Assessment Report** both consider the movement of mobile or migratory species such as bird, fish and marine and terrestrial mammals and their potential to interact with infrastructure. The Project's compliance with the East Inshore Marine Plan is set out in Table 2.3 of this document. |
| 5.4.26 | The applicant should seek the advice of the appropriate SNCB and provide the Secretary of State with such information as the Secretary of State may reasonably require, to determine whether an HRA Appropriate Assessment is required. Applicants can request and agree 'Evidence Plans' with SNCBs, which is a way to record upfront the information the applicant needs to supply with its application, so that the HRA can be efficiently carried out. If an AA is required, the applicant must provide the Secretary of State with such information as may reasonably be required to enable the Secretary of State to conduct the AA. This should include information on any mitigation measures that are proposed to minimise or avoid likely significant effects. | As set out in **Application Document 5.2 Habitats Regulations Assessment Report**, as required by Planning Inspectorate's guidance document Nationally Significant Infrastructure Projects: Advice on Habitats Regulations Assessments (Planning Inspectorate, 2024, updated 2026) and good practice, the HRA and its emerging findings have been shared with Natural England on a regular basis during the development of the Project. This has been through a combination of meetings and document sharing. Comments received and how they have been addressed are set out in **Application Document 5.1 Consultation Report and Application Document 6.9 Chapter 9 Ornithology.**<br>As detailed in **Application Document 5.2 Habitats Regulations Assessment Repor**t a report to inform the Appropriate Assessment is required because the HRA Screening undertaken could not rule out all likely significant effects. The Appropriate Assessment in the HRA Report concludes that the Project (either alone or in-combination with other plans or projects) would not result in an adverse effect on the integrity of a European site following the implementation of mitigation. Embedded, control and management and additional mitigation measures that are proposed to minimise or avoid likely significant effects are set out in the HRA Report, as well as where relevant in **Application Document 7.3 Register of Environmental Actions and Commitments, Application Document 7.2 Outline Code of Construction Practice, Application Document 7.8 Outline Landscape and Ecology Management Plan, Application Document 7.5 Outline Soil Management Plan, Application Document 7.7 Outline Noise and Vibration Management Plan**, and these documents will be secured by **Application Document 3.1 Draft Development Consent Order.** |
| 5.4.33 | Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational phases. | Irreplaceable habitats including ancient woodland and trees, and veteran trees, have been a key consideration since the early stages of siting and design of the Project. **Application Document 7.17 Strategic Options Report Including Needs Case**, **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study**, **Application Document 7.19 Supplementary Corridor and Routeing Report**, and **Application Document 5.9 Design Development Report** provide an overview of the design rationale for the Project. They explain how the Project has sought to avoid or reduce significant environmental effects from the initial option identification and site selection stage to the refinement of the Project, including siting, in response to feedback, further assessments and design work. |

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| | | **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** sets out the iterative appraisal and optioneering process undertaken in accordance with the Holford Guidance. It explains that a core environmental objective from the outset was the avoidance of irreplaceable habitats, including ancient woodland. It states at section 5.6 that at the strategic corridor definition stage, ancient woodland was established as a high-sensitivity constraint. The document confirms that the vast majority of ancient woodland parcels within the wider study area were avoided altogether, with smaller parcels only encompassed within corridor boundaries where sufficient width and flexibility existed to secure total avoidance during subsequent routeing and detailed design stages. Section 12.3 of **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** describes the following specific design alternatives considered which sought to directly avoid or minimise impacts on ancient and mature woodland.<br>**Application Document 7.14 Arboricultural Impact Assessment: Appendix E Veteran Tree Assessment Methodology** also explains how the Project has followed the mitigation hierarchy to avoid or minimise impacts to irreplaceable habitats including ancient woodland and veteran trees as far as practicable. It sets out a number of embedded measures incorporated into the Project design to avoid or minimise impacts to irreplaceable habitats including ancient woodland and veteran trees. These are also set out in **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.8 Outline Landscape and Ecology Management Plan** and include:<br>• Micro-siting of pylons to take into account swing of the proposed overhead lines to minimise the instance where woodland would need to be cleared to avoid the overhead line swing, to avoid or minimise loss of woodland and trees as far as practicable.<br>• Designated ancient woodlands will be protected throughout the works with a minimum exclusion zone of 15 m offset from the edge of the designated ancient woodland. For any necessary works within the RPAs, an Arboricultural Clerk of Works (ArbCoW) will be consulted to agree the working method, including for example, where breaking ground is required and to remove compaction risks.<br>• All known veteran trees within, and which have canopy overhanging, the Order Limits will be retained with the exception of T4 Common Oak - *Quercus robur* which cannot be retained if the flexibility afforded by the Limits of Deviation were to be used. The locations of veteran trees are shown within Appendix D of **Application Document 7.14 Arboricultural Impact Assessment**.<br>• National Grid has committed to a 3:1 replacement for individual trees and individual trees within small groups. The Project will prioritise (where possible and practicable) the replanting for individual trees and small groups of individual trees within the Order Limits.<br>Specific measures during construction to minimise impacts to irreplaceable habitats such as adherence to good site practices and ensuring legal compliance, protective measures, crown management and pruning requirements are set out in **Application Document 7.3 Register of Environmental Actions and Commitments, Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.2 Outline Code of Construction Practice**.<br>Although the mitigation hierarchy has been applied and the Project design has intended to avoid impacts on irreplaceable habitats as far as practicable, the residual significant effects on Socken Wood and part of Wood Farm are unavoidable. While the LoD will only be used in this area where there is a clear engineering or safety need (or other reason to move a pylon within the LoD), should the LoD be used in relation to Jillywood Lane and veteran tree (T4) the Project will also have an impact on these irreplaceable habitats.<br>It is acknowledged that Woodlands with Characteristics of Ancient Woodland and veteran trees are classed as being irreplaceable in NPS EN-1, therefore full compensation is unachievable. |

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| | | However, reducing impacts on irreplaceable habitats are and have been a key consideration for the Project, and a compensation strategy is proposed for each area of irreplaceable habitat that would potentially be impacted, as set out below.<br>Should one veteran tree (T4) require removal if the LoD are used, compensation planting, as detailed in Table 8.2 of **Application Document 7.8 Outline Landscape and Ecology Management Plan** is proposed at Socken Wood which is an area of Woodland with Characteristics of Ancient Woodland (which is also located in Route Section A). A replanting ratio of 30:1 has been agreed with Natural England and East Riding of Yorkshire Council, secured through **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Mitigation is proposed for works within Socken Wood and Wood Farm as set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments. Measures** and includes:<br>• Restricting tree loss to only those essential for the proposed overhead line clearance.<br>• All affected trees in Socken Wood will be soft felled.<br>• Where trees are coppiced and/or felled to facilitate the construction of the Project, sufficient trees (quantity agreed with the ArbCoW and ECoW) will be placed within the woodland and/or mitigation planting areas in locations agreed with the ECoW in the form of log piles (and not wood chips).<br>• For those not used for log piles, these will not be left as woodchip within the woodlands.<br>• Any trees removed within the area of potential ancient woodland will not be removed to below ground level and not grubbed out to reduce the impact to soil and ground flora.<br>• No other access will be taken for works through the woodlands to protect ground flora and retained trees.<br>To compensate for the significant residual effect on Socken Wood and part of Wood Farm, woodland planting is proposed and is secured in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and includes:<br>• Compensation planting for Socken Wood is proposed adjacent to Socken Wood, near pylon 4AF26 with links to the existing Socken Wood, following lines of a historic woodland previously present in this area, in order to restore the woodland. Planting would comprise deciduous woodland mix and woodland edge mix, with lower height species to be used under the proposed overhead line to maintain electrical clearances.<br>• Compensation planting for Wood Farm is proposed to the east of Wood Lane (and Wood Farm) near pylon 4AF194, along the watercourse to the east of Wood Lane and north of pylon 4AF195, comprising deciduous woodland mix with woodland edge mix planting. The species planted would have consideration of those removed during construction.<br>Additional potential compensatory measures that could be developed during detailed design could include phased tree surgery, genetic conservation and commitments to maintain and monitor compensation areas for a minimum of 30 years.<br>As set out above, National Grid has committed to a 3:1 replacement for individual trees and individual trees within small groups which would include replacement planting for Socken Wood and Wood Farm.<br>In terms of impacts at Jillywood Lane LWS if the LoD is used, and trees are required to be removed, mitigation is set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments** and includes**:**<br>• Any future detailed design will take into consideration the extent of the linear woodland and its associated buffer to reduce potential impacts as far as practicable. |

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| | | • All affected trees will be soft felled.<br>• Any trees removed within the area of linear woodland will not be removed to below ground level and not grubbed out to reduce the impact to soil and ground flora.<br>• Any wood chipping will be done outside of the woodland and removed, to protect the ground flora.<br>Compensation tree planting is also proposed if the LoD is used and Jillywood Lane LWS is impacted. Planting is proposed to the north of pylon 4AF8 to the east of the A164 and adjacent to Jillywood Lane and would comprise deciduous woodland mix with woodland edge mix. The species mix would consider the existing planting along Jillywood Lane. This is secured in **Application Document 7.8 Outline Landscape and Ecology Management Plan.**<br>All mitigation planting areas are shown in **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**. |
| 5.4.34 | Applicants should consider any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity, and the protection and restoration of the ability of habitats to store or sequester carbon as set out under Section 4.6. | The Project has given consideration to opportunities to maximise the restoration, creation and enhancement of wider biodiversity, identified through local nature recovery strategies, national goals and targets set through the Environment Act 2021 (HM Government, 2021) and the Environmental Improvement Plan (Defra, 2025).<br>**Application Document 7.1 Biodiversity Net Gain Report** concludes that the Project would achieve at least 10% BNG through on-site and off-site habitat creation. To achieve a 10% BNG, the Project is predicted to require an additional 436.72 area habitat units, 70.46 hedgerow units and 12.65 watercourse units.<br>The Project proposes to address BNG requirements primarily through off-site habitat creation which will be secured through the purchase and allocation of registered off-site biodiversity units from suitably qualified biodiversity unit providers.<br>National Grid is also exploring opportunities to deliver BNG through habitat creation and enhancement within the Order Limits on land under its ownership or control where the habitats will not affect the operational requirements. Within the Order Limits and adjacent to Treswell Wood, a 12.17-hectare area (the BNG Opportunity Area) has been identified as a potential on-site BNG mitigation location, although acquisition and use for BNG are not yet confirmed. High-level optioneering indicates a feasible habitat creation strategy focused on “other woodland; broadleaved” targeting moderate condition, which would be coherent with the surrounding ancient-semi-natural woodland context and support landscape-scale connectivity goals.<br>Strategically, the proposed woodland creation would contribute to local biodiversity priorities for hazel dormouse (Muscardinus avellanarius) as set out in the Nottinghamshire and Nottingham Local Nature Recovery Strategy, achieving High strategic significance. Functionally, the habitat would extend the existing Treswell Wood assemblage and strengthen ecological networks across the local landscape, improving permeability and resilience for woodland-associated species.<br>From a quantitative BNG perspective, the Treswell Wood Opportunity Area is estimated to deliver approximately 40.03 area units, which would partially address the current project shortfall of 436.72 area units.<br>The balance between on-site and off-site delivery will be developed as the Project design and the BNG assessment develop through detailed design. The delivery strategy will seek to maximise ecological outcomes, long-term deliverability and security of outcomes, alignment with relevant Local Nature Recovery Strategies, and value for consumers.<br>In the event that on-site BNG delivery options are taken forward, National Grid will seek to establish onsite habitat creation and enhancement measures as early as practicable where habitats can be protected from construction activities and their early delivery would not prejudice the safe and efficient construction or operation of the Project. The programme for habitat creation and enhancement will be developed alongside the detailed Project design and construction programme. |
| 5.4.35 | Consideration should be given to improvements to, and impacts on, habitats and species in, around and beyond developments, for wider ecosystem services and natural capital benefits, beyond those under protection and identified as being of principal importance. This may include considerations and opportunities identified through Local Nature Recovery Strategies, and national goals and targets set through the Environment Act 2021 and the Environmental Improvement Plan. | |

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| | | The delivery of BNG will be secured through the relevant DCO requirement at set out in **Application Document 3.1 Draft Development Consent Order**, legal agreements and contractual arrangements, as appropriate, and will be implemented in accordance with the applicable consent requirements before the Project becomes operational.<br>Management, monitoring and reporting for onsite biodiversity gains will be undertaken in accordance with **Application Document 7.8 Outline Landscape and Ecology Management Plan** which will be secured by **Application Document 3.1 Draft Development Consent Order**. Offsite biodiversity gains will be managed, monitored and reported in accordance with the relevant legal and contractual arrangements and, where applicable, for a minimum period of 30 years. |
| 5.4.36 | Applicants should include appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the proposed development. In particular, the applicant should demonstrate that:<br>• during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works;<br>• the timing of construction has been planned to avoid or limit disturbance;<br>• during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements;<br>• habitats will, where practicable, be restored after construction works have finished;<br>• opportunities will be taken to enhance existing habitats rather than replace them, and where practicable, create new habitats of value within the site landscaping proposals. Where habitat creation is required as mitigation, compensation, or enhancement, the location and quality will be of key importance. In this regard habitat creation should be focused on areas where the most ecological and ecosystems benefits can be realised; and<br>• mitigations required as a result of legal protection of habitats or species will be complied with. | National Grid has committed to several avoidance, mitigation and compensation measures in the design of the Project, which are set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan**, **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.2 Outline Code of Construction Practice**. These documents demonstrate the following:<br>Construction exclusion zones (CEZs) will be established prior to construction to define working areas and ensure protection of retained habitats throughout the Project. Where practicable (with some exceptions), no construction works (temporary or permanent) will occur within the following environmental buffers:<br>• 10 m of a woodland block (or as detailed in the **Application Document 7.14 Arboricultural Impact Assessment**);<br>• 15 m of designated ancient and other woodland recorded by the Project as having characteristics of ancient woodland;<br>• 5 m of a hedgerow, plus Root Protection Areas (RPAs) for retained trees within the hedgerow;<br>• 10 m of a pond (holding water);<br>• 5 m of the top of a ditch;<br>• 10 m of an ordinary watercourse; and<br>• 16 m of a main river.<br>**Application Document 7.7 Outline Noise and Vibration Management Plan** has been prepared to set out the framework for how noise and vibration will be controlled and managed. The Main Works Contractor(s) will conduct detailed construction noise and vibration assessments to determine whether any additional measures, including site-specific best practicable means (BPM) and monitoring, may be required. A Noise and Vibration Management Plan will be prepared by the Main Works Contractor(s) substantially in accordance with the **Application Document 7.7 Outline Noise and Vibration Management Plan** and submitted for approval by the relevant local planning authority prior to the commencement of construction, and updated and managed during the construction phase as appropriate.<br>Plant and equipment will be shut-down when not in use. For the construction of pylon foundations, non-percussive piling methods would be used where practicable. If percussive piling is required for pylon foundations near the River Ouse (see also commitment NV18), appropriate control measures to reduce potential effects on the aquatic environment will be identified by the Main Works Contractor(s) and implemented in accordance with Commitments NV01 and NV02.<br>Best practice measures will be followed to avoid or minimise risks of disturbance or damage to species or habitats, as set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan and Application Document 7.3 Register of Environmental Actions and Commitments.**<br>Land used temporarily will be reinstated to its pre-construction condition and use (or as agreed with the relevant landowner). Hedgerows, fences, and walls (including associated earthworks and |

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| | | boundary features) will be reinstated to a similar style and quality to those that were removed, unless otherwise agreed.<br>**Application Document 7.8 Outline Landscape and Ecology Management Plan** sets out where mitigation planting is proposed that would enhance existing habitats. In addition, National Grid has committed to at least 10% BNG as set out in **Application Document 7.1 Biodiversity Net Gain Report** which will comprise on-site and off-site habitat creation.<br>The works and activities to be undertaken must be carried out in accordance with the detailed Code of Construction Practice and other management plans which will be secured by **Application Document 3.1 Draft Development Consent Order**. |
| 5.4.37 | Applicants should produce and implement a Biodiversity Management Strategy as part of their development proposals. This could include provision for biodiversity awareness training to employees and contractors so as to avoid unnecessary adverse impacts on biodiversity during the construction and operation stages. | **Application Document 7.8 Outline Landscape and Ecology Management Plan Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments** include provision of training to employees and contractors to avoid unnecessary adverse impacts on biodiversity during the construction and operational phases.<br>It states, all staff and operatives working on the Project will undergo a site-specific induction, which is anticipated to include the following environmental topics:<br>• Working in or adjacent to protected sites and Priority Habitats, invasive flora, protected species management;<br>• Working around tree/hedgerow root protection areas;<br>• Working in or near water; and<br>• Soil management and protection of soil quality.<br>Environmental toolbox talks will be provided by the Main Works Contractor(s). These will give targeted information about site-specific issues or activities taking place at that time. |
| 5.4.42 | The benefits of nationally significant low carbon energy infrastructure development may include benefits for biodiversity and geological conservation interests and these benefits may outweigh harm to these interests. The Secretary of State may take account of any such net benefit in cases where it can be demonstrated. | The substantial need and benefit of the Project, as CNP infrastructure which would contribute toward net zero, along with the ecological benefit of at least 10% BNG, is considered to outweigh the harm anticipated to irreplaceable habitats as a result of the Project. |
| 5.4.43 | As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives (as set out in Section 4.3 above). Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought. | As set out in **Application Document 7.1 Biodiversity Net Gain Report**, National Grid has applied the mitigation hierarchy to avoid and minimise impacts of the Project as far as practicable through measures set out in **Application Document 7.3 Register of Environmental Actions and Commitments**. The Project has sought first to avoid impacts, then minimise unavoidable effects, and finally compensate for residual losses.<br>Ecological and ornithological matters, including irreplaceable habitats were considered in the early stages of siting and design of the Project and embedded measures have been intrinsic to the design of the Project to reduce and where possible, avoid effects. **Application Document 5.9 Design Development Report** and **Application Document 7.17 Strategic Options Report Including Needs Case** both provide an overview of the design rationale for the Project. They explain how the Project has sought to avoid or reduce significant environmental effects from the initial option identification and site selection stage to the refinement of the Project, including siting, in response to feedback, further assessments and design work.<br>Following the implementation of embedded, control and additional mitigation measures, **Application Document 6.8 Environmental Statement Chapter 8 Ecology** and **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** conclude that the Project, based on the current design as set out in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project**, avoids residual significant adverse impacts on all international and national and local statutory designated sites for nature conservation including SSSIs, non-statutory designated sites, priority habitats, important hedgerows and other terrestrial habitats.. This has been achieved by |
| 5.4.44 | If significant harm to biodiversity resulting from a development cannot be avoided (for example through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then the Secretary of State will give significant weight to any residual harm. | |

following the mitigation hierarchy with the design process, and in accordance with the Holford Guidance, to avoid impacts where possible. **Application Document 6.12 Environmental Statement Chapter 12 Geology and Hydrogeology** concludes that no impacts are reported for geological conservation interests.

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

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

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

As the design currently stands and should the LoD not be used in Route Section A, the Project would not result in the loss or deterioration of any designated (on the AWI) ancient woodland or trees, or veteran trees. In the event that the LoD is used and the loss of one veteran tree is required, compensation planting (with a replanting ratio of 30:1) would be implemented as secured in **Application Document 7.3 Register of Environmental Actions and Commitments** and agreed with Natural England and East Riding of Yorkshire Council.

Significant effects are reported on some areas of Woodlands with Characteristics of Ancient Woodland, based on the current design, which would result in the loss or deterioration of irreplaceable habitats at Socken Wood and Wood Farm. Mitigation is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan and Application Document 7.3 Register of Environmental Actions and Commitments** to ensure that impacts are reduced as far as practicable, and compensation planting with a ratio of 3:1 is proposed and is secured in **Application Document 7.8 Outline Landscape and Ecology Management Plan**.

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

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| | | Therefore, in accordance with paragraph 5.4.55 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) it is considered that the overriding public need and benefit of the Project (as set out in sections 3 and 7.5 of Application **Document 5.5 Planning Statement**) would clearly outweigh the loss or deterioration of the habitat, and it would therefore be wholly exceptional. In addition, a relevant compensation strategy is provided within the Order Limits for potential impacts as far as possible and is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**. |
| 5.4.45 | The Secretary of State should consider what appropriate requirements should be attached to any consent and/or in any planning obligations entered into, in order to ensure that any mitigation or biodiversity net gain measures, if offered, are delivered and maintained. Any habitat creation or enhancement delivered including linkages with existing habitats for compensation or biodiversity net gain should generally be maintained for a minimum period of 30 years, or for the lifetime of the project, if longer. | Requirement 4 of **Application Document 3.1 Draft Development Consent Order** requires that the Project be carried out in accordance with a detailed Landscape and Ecology Management Plan, which will be substantially in accordance with **Application Document 7.8 Outline Landscape and Ecology Management Plan.** |
| 5.4.46 | The Secretary of State will need to take account of what mitigation measures may have been agreed between the applicant and the SNCB and the MMO/NRW (where appropriate). The Secretary of State will also need to consider whether the SNCB or the MMO/NRW has granted or refused, or intends to grant or refuse, any relevant licences, including protected species mitigation licences. | **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.8 Outline Landscape and Ecology Management Plan** set out ecology mitigation measures that National Grid has committed to, which have been developed in consultation with the relevant SNCB.<br>National Grid has engaged with Natural England regarding licensing requirements for each relevant species. The preparation of draft “ghost” licences for relevant species will be prepared and issued to Natural England. If Natural England are in agreement with the licence, a Letter of No Impediment will be issued. National Grid are not aware of any reason relevant licences would not be granted. |
| 5.4.47 | Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. The Secretary of State should give appropriate weight to environmental and biodiversity enhancements, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited. | National Grid has committed to deliver at least 10% Biodiversity Net Gain (BNG) with wider environmental and societal benefits. The Project will achieve a minimum of 10% BNG (through on-site and off-site BNG) and has undertaken a BNG assessment (based on the Statutory Biodiversity Metric calculation tool (Defra, 2026)) which is presented in **Application Document 7.1 Biodiversity Net Gain Report**. |
| 5.4.48 | When considering proposals, the Secretary of State should maximise such reasonable opportunities in and around developments, using requirements or planning obligations where appropriate. This can help towards delivering biodiversity net gain as part of or in addition to the approach set out at Section 4.6. | |
| 5.4.49 | In taking decisions, the Secretary of State should ensure that appropriate weight is attached to designated sites of international, national, and local importance; protected species; habitats and other species of principal importance for the conservation of biodiversity; and to biodiversity and geological interests within the wider environment. | **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** and **Application Document 5.2 Habitats Regulations Assessment Report** describe in detail the weight attached to designated sites of international, national, and local importance; protected species; habitats and other species of principal importance for the conservation of biodiversity; and to biodiversity and geological interests within the wider environment considering national and local policy and legislation. |
| 5.4.51 | The Secretary of State must consider whether the project is likely to have a significant effect on a protected site which is part of the National Site Network (a habitat site), a protected marine site, or on any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans or projects. | The Project would not have any significant adverse effect on a protected site which is part of the National Site Network, a protected marine site, or on any site to which the same protection is applied as a matter of policy. |
| 5.4.52 | The Secretary of State should use requirements and/or planning obligations to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site’s biodiversity or geological interest. | **Application Document 7.8 Outline Landscape and Ecology Management Plan, Application Document 7.3 Register of Environmental Actions and Commitments and Application Document 7.2 Outline Code of Construction Practice, Application Document 7.5 Outline Soil Management Plan, and Application Document 7.7 Outline Noise and Vibration Management Plan** include measures to ensure the conservation and enhancement of biodiversity and geodiversity. **Application Document 3.1 Draft Development Consent Order** requires that the |

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| | | Project be carried out in accordance with a detailed management plans, which will be substantially in accordance with the outline plans submitted with the DCO application. |
| 5.4.54 | The Secretary of State should give due consideration to regional or local designations. However, given the need for new nationally significant infrastructure, these designations should not be used in themselves to refuse development consent. | As set out in **Application Document 6.8 Environmental Statement Chapter 8 Ecology,** there is the potential, if the LoD is used, for significant adverse effects on Jillywood Lane LWS, due to the inclusion of Woodland with Characteristics of Ancient Woodland within the LWS. The current design would not impact on the LWS, but as a worst case scenario if the LoD is used, significant effects would arise. Measures to ensure impacts are minimised during construction, operation and maintenance are set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan, Application Document 7.3 Register of Environmental Actions and Commitments.** Mitigation planting is proposed to compensate for any tree losses, and a suitable compensation strategy will be confirmed during detailed design for impacts to ancient woodland, as set out in paragraph 5.4.55 below. |
| 5.4.55 | The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists. | Irreplaceable habitats including ancient woodland and trees, and veteran trees, have been a key consideration since the early stages of siting and design of the Project. **Application Document 7.17 Strategic Options Report Including Needs Case**, **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study**, **Application Document 7.19 Supplementary Corridor and Routeing Report**, and **Application Document 5.9 Design Development Report** provide an overview of the design rationale for the Project. They explain how the Project has sought to avoid or reduce significant environmental effects from the initial option identification and site selection stage to the refinement of the Project, including siting, in response to feedback, further assessments and design work.<br><br>**Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** sets out the iterative appraisal and optioneering process undertaken in accordance with the Holford Guidance. It explains that a core environmental objective from the outset was the avoidance of irreplaceable habitats, including ancient woodland. It states at section 5.6 that at the strategic corridor definition stage, ancient woodland was established as a high-sensitivity constraint. The document confirms that the vast majority of ancient woodland parcels within the wider study area were avoided altogether, with smaller parcels only encompassed within corridor boundaries where sufficient width and flexibility existed to secure total avoidance during subsequent routeing and detailed design stages. Section 12.3 of **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** describes the following specific design alternatives considered which sought to directly avoid or minimise impacts on ancient and mature woodland<br><br>**Application Document 7.14 Arboricultural Impact Assessment: Appendix E Veteran Tree Assessment Methodology** also explains how the Project has followed the mitigation hierarchy to avoid or minimise impacts to irreplaceable habitats including ancient woodland and veteran trees as far as practicable. It sets out a number of embedded measures incorporated into the Project design to avoid or minimise impacts to irreplaceable habitats including ancient woodland and veteran trees. These are also set out in **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.8 Outline Landscape and Ecology Management Plan** and include:<br>• Micro-siting of pylons to take into account swing of the proposed overhead lines to minimise the instance where woodland would need to be cleared to avoid the overhead line swing, to avoid or minimise loss of woodland and trees as far as practicable.<br>• Designated ancient woodlands will be protected throughout the works with a minimum exclusion zone of 15 m offset from the edge of the designated ancient woodland. For any necessary works within the RPAs, an Arboricultural Clerk of Works (ArbCoW) will be consulted to agree the working method, including for example, where breaking ground is required and to remove compaction risks. |

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- All known veteran trees within, and which have canopy overhanging, the Order Limits will be retained with the exception of T4 Common Oak - *Quercus robur* which cannot be retained if the flexibility afforded by the Limits of Deviation were to be used. The locations of veteran trees are shown within Appendix D of **Application Document 7.14 Arboricultural Impact Assessment**.
- National Grid has committed to a 3:1 replacement for individual trees and individual trees within small groups. The Project will prioritise (where possible and practicable) the replanting for individual trees and small groups of individual trees within the Order Limits.

Specific measures during construction to minimise impacts to irreplaceable habitats such as adherence to good site practices and ensuring legal compliance, protective measures, crown management and pruning requirements are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.2 Outline Code of Construction Practice**.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

It is therefore considered that impacts of the Project on irreplaceable habitat are wholly exceptional and the overriding public need and benefits of the Project, would outweigh the loss or deterioration of woodland at Socken Wood and Wood Farm Woodland with Characteristic of Ancient Woodland. It would also outweigh the potential loss or deterioration of one veteran tree, and trees within Jillywood Lane LWS if the LoD are used.

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| 5.4.56 | The Secretary of State should ensure that species and habitats identified as being of importance for the conservation of biodiversity are protected from the adverse effects of development by using requirements, planning obligations, or licence conditions where appropriate. | **Application Document 7.8 Outline Landscape and Ecology Management Plan, Application Document 7.3 Register of Environmental Actions and Commitments and Application Document 7.2 Outline Code of Construction Practice, Application Document 7.5 Outline Soil Management Plan, and Application Document 7.7 Outline Noise and Vibration Management Plan** include measures to ensure the conservation and enhancement of biodiversity and geodiversity. **Application Document 3.1 Draft Development Consent Order** requires that the Project be carried out in accordance with a detailed management plans, which will be substantially in accordance with the outline plans submitted with the DCO application. |
| 5.4.57 | The Secretary of State should refuse consent where harm to a protected species and relevant habitat would result, unless there is an overriding public interest and the other relevant legal tests are met. In this context the Secretary of State should give substantial weight to any such harm to the detriment of biodiversity features of national or regional importance or the climate resilience and the capacity of habitats to store carbon, which they consider may result from a proposed development. | Following the implementation of embedded, control and additional mitigation measures, **Application Document 6.8 Environmental Statement Chapter 8 Ecology** and **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** conclude that the Project, based on the current design as set out in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project**, avoids residual significant adverse impacts on all international and national and local statutory designated sites for nature conservation including SSSIs, non-statutory designated sites, priority habitats, important hedgerows and other terrestrial habitats.. This has been achieved by following the mitigation hierarchy with the design process, and in accordance with the Holford Guidance, to avoid impacts where possible.<br><br>It should be noted that this conclusion is based on the assessment surveys that have been undertaken thus far for the Project. Additional 2026 surveys are currently continuing, and any additional assessment results would be provided in addendum reports following submission of the DCO.<br><br>**Application Document 6.8 Environmental Statement Chapter 8 Ecology** concludes that there would be a residual significant adverse effect on Yellow birds-nest, which is a wildflower, due to the permanent loss of plants due to pylon working areas (pylons 4ZQ78 and 4ZQ77), access, stringing works, and overhead line clearance (between 4ZQ78 and 4ZQ76) requiring felling and management of trees within woodland at or in the vicinity of the top of Bilks Hill, and therefore the associated fungal network that the plant is dependent on. As noted above and in Table 8.21 of **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, mitigation is proposed to ensure there would be no direct effects or encroachment on yellow bird's nest, however residual significant effects remain due to impacts to the fungal network that the flower relies on. There would be no other significant adverse effects on any other species or protected species, including all bird species.<br><br>It is also noted that if the LoD are used during construction near Jillywood Lane LWS, then habitats could be impacted in two locations. This would result in a significant adverse effect because the LWS has been recorded by the Project as containing Woodland with Characteristics of Ancient Woodland. Therefore, as a worst case, this habitat is considered irreplaceable. If the LoD is used, and trees are required to be removed at Jillywood Lane LWS, mitigation set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments** would ensure that any trees removed will not be removed to below ground level and not grubbed out to reduce the impact to soil and ground flora. Compensation would also be provided via new trees to be planted in proposed mitigation planting areas, outside the LWS, which are described in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and shown in **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.<br><br>A significant residual adverse effect is also anticipated on parts of Woodlands with Characteristics of Ancient Woodland, but are not included on the Ancient Woodland Inventory (AWI), as well as on one veteran tree, if the LoD are used, as discussed at paragraph 5.4.54 |

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| **5.5 Civil and Military Aviation and Defence Interests** | | |
| 5.5.38 | Where the proposed development may affect the performance of civil or military aviation CNS, meteorological radars and/or other defence assets an assessment of potential effects should be set out in the ES (see Section 4.3). | An Aviation Assessment is provided as Appendix A of **Application Document 5.9 Design Development Report** and has been carried out by National Grid to evaluate the risk to operations at eight aerodromes along the route of the Project. It also considers military aviation CNS, meteorological radars and other defence assets. In addition, **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** provides an assessment of potential effects of the Project on the operation and recreation effects on aerodromes.<br><br>**Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** concludes that three out of the eight unlicensed aerodromes located within 500 m of the Project are anticipated to experience significant adverse impacts on commercial operations and recreational use due to the construction of the proposed overhead line as discussed above. These aerodromes are Forwood Farm Airfield, Headon Airfield, and Darlton Gliding Club. Although significant adverse impacts are expected, two of these airfields can continue their use, with only one airfield needing to permanently cease operations, as a worst case scenario. The affected airfields are currently only used for recreational activities and are not used currently for military or defence operations.<br><br>In addition, a high level assessment was undertaken on four additional aerodromes located further away from the Project, including Retford/Gamston Aerodrome, Humberside International Airport, Sandtoft Aerodrome, and Doncaster Sheffield Airport; however, no conflict exists between them and the Project.<br><br>Consultation with the MOD Defence Infrastructure Organisation (DIO) confirmed that the proposed development area of the Project occupies the statutory safeguarding zones that surround the East 1 Wide Area Multilateration (WAM) Network which contributes to aviation safety by feeding into the air traffic management system in eastern England. The proposed development area is also within Military Low Flying Areas (LFAs) 06 and 11.<br><br>National Grid has engaged with the MOD DIO by providing detailed project design information including updates to overhead line alignments and indicative pylon heights which allowed for the MOD DIO to assess the potential impacts on the identified assets. With respect of the interactions of the Project with the Clarborough to Belmont and the Clarborough to Waddington WAM Microwave Links, engagement with the MOD DIO and assessment by National Grid is ongoing to understand the potential project impacts on the military communications infrastructure which will be informed through the provision of detailed Project design information. To ensure the proposed overhead line does not physically affect the WAM networks the MOD DIO has requested requirements to be include within the draft Development Consent Order. The inclusion of such requirements within the DCO is subject to ongoing assessment work by National Grid.<br><br>In relation to the impact of the Project on Military LFAs 06 and 11 the MOD DIO has requested that the Project provide information on the construction of new pylons and any removal or modifications to the siting of existing pylons so aviation chart data can be updated. In addition, the Project will provide MOD DIO with information about where crane deployments will occur to maintain the safety of military aircraft engaging in low flying training activities as requested by the MOD DIO who have requested that requirements be included within the draft Development Consent Order to secure this. The inclusion of such requirements within the DCO is subject to ongoing assessment work by National Grid.<br><br>National Grid identified that part of the proposed alignment of the Project south of Gainsborough was within the statutory safeguarding zone of the Ingham Meteorological Technical Site, therefore the Met Office was consulted. The Met Office confirmed that they had no comments on the proposal and do not need to be consulted further. |

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| 5.5.40 | The applicant should consult the MOD, Met Office, Civil Aviation Authority (CAA), NATS and any aerodrome – licensed or otherwise – likely to be affected by the proposed development in preparing an assessment of the proposal on aviation, meteorological or other defence interests. | As set out in **Application Document 5.1 Consultation Report** and its appendices, National Grid has consulted with the MOD, Civil Aviation Authority, NATS and all relevant aerodromes as the Project is likely to affect an unlicensed aerodrome. The MOD confirmed in its consultation response that the proposed development area of the Project occupies the statutory safeguarding zones that surround the East 1 Wide Area Multilateration (WAM) Network which contributes to aviation safety by feeding into the air traffic management system in eastern England. The proposed development area is also within Military LFAs 06 and 11.<br>National Grid identified that part of the proposed alignment of the Project south of Gainsborough was within the statutory safeguarding zone of the Ingham Meteorological Technical Site, a C-band weather radar station operated by the Met Office, part of the UK rain radar network, therefore the Met Office was also consulted. |
| 5.5.41 | Any assessment of effects on aviation, meteorological or other defence interests should include potential impacts of the project upon the operation of CNS infrastructure, Instrument Flight Procedures, flight patterns (both civil and military), generation of weather warnings and forecasts, other defence assets (including radar) and aerodrome operational procedures. It should also assess the demonstratable cumulative effects of the project with other relevant projects in relation to aviation, meteorological and defence. | The assessment in Appendix A of **Application Document 5.9 Design Development Report** and **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** includes the potential impacts of the Project on CNS infrastructure, instrument flight procedures, flight patterns, generation of weather warnings and forecasts, other defence assets and aerodrome operational procedures.<br>**Application Document 6.21 Environmental Statement Chapter 21 Inter-project Cumulative Effects** assesses the cumulative effects of the Project with other relevant projects in relation to socio-economics which includes aerodromes, and there are no significant inter-project cumulative effects. |
| 5.5.42 | In addition, consideration of developments near aerodromes should take into account the following factors:<br>• Bird Strike Risk – Aircraft are vulnerable to wildlife strike, in particular bird strike. Birds and other wildlife may be attracted to the vicinity of an aerodrome by various types of development, for example, large buildings with perching/roosting opportunities for birds. It is therefore important that infrastructure, buildings and other elements from energy installations, as well as environmental mitigation and enhancement are designed in such a way so as not to increase the bird strike risk to the airport for developments within 13km (this can vary).<br>• Building Induced Turbulence – If a significant building or structure is proposed close to the airport/runways, there is potential for building induced turbulence/wind shear to be created which has the potential to impact on aircraft on take-off and landing. Studies may be required to identify the extent of any turbulence resulting from the energy infrastructure.<br>• Thermal Plume Turbulence – This is caused under certain conditions by the release of hot air from a power plant equipped with a dry cooling system. The plumes generated by these facilities have the potential to create invisible turbulence that can affect the manoeuvrability of aircraft. | Appendix A of **Application Document 5.9 Design Development Report** concludes that the introduction of the Project would not result in an increase in the population size of birds, especially bird species which typically cause the largest threat of collision with aircraft such as larger wetland species such as geese, swans, duck and waders.<br>It has also been considered whether EMF from the overhead line might impact aircraft avionics or other aircraft systems, compromising operational safety. It is assessed that minimum clearances allowed for aircraft overflying or otherwise within the vicinity of the overhead line will enable aircraft to be sufficiently distanced to avoid unacceptable adverse effects and is therefore safe. This assessment is justified by National Grid's direct experience of operating aircraft in very close proximity to live overhead lines (within tens of metres), while carrying out routine visual asset assessment regimes in unmodified helicopters, with no impacts on instrumentation noted.<br>In addition to the clearances to aircraft operating under Visual Flight Rules (VFR) there are also prescribed obstacle clearances for aircraft following Instrument Flight Procedures (IFP) whilst arriving at and departing from aerodromes. These are referred to as Standard Instrument Departures (SIDs) and Standard Terminal Arrival Route (STARs) and are typically flown by commercial aircraft. None of the aerodromes assessed operate any IFPs and it is not anticipated that they will do in the future, except for Doncaster Sheffield Airport, where no conflict is expected due to the distance between it and the Project.<br>In terms of wind turbulence effects, there appears to be no evidence of electricity pylons causing wind turbulence effects on aircraft. This is likely due to the open 'lattice' type nature of the structures, generating much smaller wake effects and significantly less mechanical turbulence than a solid obstacle of equivalent height. It is therefore considered that the presence of the overhead line will not increase the risk of wind turbulence for aircraft. |
| 5.5.44 | If any relevant changes are made to proposals during the preapplication and determination period, it is the responsibility of the applicant to ensure that the relevant aviation, meteorological and defence consultees are informed as soon as reasonably possible. | Noted. |

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| 5.5.45 | The applicant should include appropriate mitigation measures as an integral part of the proposed development. | As set out in Appendix A of **Application Document 5.9 Design Development Report**, none of the eight aerodromes assessed in this study, and documented in this report, are licensed, and due to their size and the nature of their operations, it is highly unlikely that they will be licensed in the future. For unlicensed aerodromes, there are no official Obstacle Limitation Surfaces (OLS) or safeguarding procedures.<br>National Grid has embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. These include sensitive routeing and siting of infrastructure and temporary works to avoid or reduce impacts on socio-economics, recreation and tourism receptors including aviation; limiting construction activities to defined daytime core working hours, reducing general disruption to nearby communities, local businesses, and tourism/recreation receptors including aviation; and a number of other commitments made within **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>National Grid have engaged with aerodrome operators at an early stage to understand the potential impacts, and measures have been discussed with aerodrome owners/operators to identify suitable mitigation to the potential impacts of the overhead line on operations and recreation. One of these commitments is that the final constructed pylon locations and vertical heights will be shared with aerodromes to ensure Project structures can be accurately charted by the relevant aerodromes impacted.<br>National Grid has engaged aerodrome operators potentially impacted by the Project at an early stage, in addition to the MOD, Civil Aviation Authority, Met Office and NATS, and consultation undertaken is set out in **Application Document 5.1 Consultation Report**.<br>National Grid has engaged with the MOD DIO by providing detailed project design information including updates to overhead line alignments and indicative pylon heights which allowed for the MOD DIO to assess the potential impacts on the identified assets. With respect of the interactions of the Project with the Clarborough to Belmont and the Clarborough to Waddington WAM Microwave Links, engagement with the MOD DIO and assessment by National Grid is ongoing to understand the potential project impacts on the military communications infrastructure which will be informed through the provision of detailed Project design information. To ensure the proposed overhead line does not physically affect the WAM networks the MOD DIO has requested requirements to be included within the draft Development Consent Order. The inclusion of such requirements within the DCO is subject to ongoing assessment work by National Grid.<br>In relation to the impact of the Project on Military LFAs 06 and 11 the MOD DIO has requested that the Project provide information on the construction of new pylons and any removal or modifications to the siting of existing pylons so aviation chart data can be updated. In addition, the Project will provide MOD DIO with information about where crane deployments will occur to maintain the safety of military aircraft engaging in low flying training activities as requested by the MOD DIO who have requested that requirements be included within the draft Development Consent Order to secure this. The inclusion of such requirements within the DCO is subject to ongoing assessment work by National Grid.<br>No effects are anticipated in relation to meteorological radar and CNS systems, as confirmed by the Met Office in their consultation response. |
| 5.5.46 | Mitigation for infringement of OLS may include:<br>• Agreed changes to operational procedures of the aerodromes in accordance with relevant guidance, provided that safety assurances can be provided by the operator that are acceptable to the CAA where the changes are proposed to a civilian aerodrome. Applicants should engage airport operators at an early stage of the planning process to understand the potential impacts of development on aviation operations and develop mitigations if appropriate; or<br>• Installation of obstacle lighting and/or by notification in Aeronautical Information Service publications | |
| 5.5.47 | For CNS infrastructure, the UK Military Low Flying System (including TTAs) and designated air traffic routes, mitigation may also include:<br>• Operational airspace changes;<br>• Agreement to upgrade CNS infrastructure, the cost of which the applicant will be required to fund until the end of the life of the surveillance equipment unless or until such time as the affected CNS infrastructure may be replaced by a fully windfarm tolerant system. If an appropriate system upgrade cannot be identified at the point of application, the applicant will be required to fund any future upgrade for the lifetime of the wind farm. MOD will engage early with developers to ensure that costs are reflective of their need and impacts of the energy installation on the monitoring equipment;<br>• Introducing commercially viable radar mitigation technology to the development, e.g. by using non-radar reflecting materials to manufacture wind turbine blades | |
| 5.5.48 | Mitigation for effects on meteorological radar and CNS systems may include reducing the scale of a project, although it is likely to be unreasonable for the Secretary of State to require mitigation by way of a reduction or alteration in the scale of development. | |
| 5.5.51 | The Secretary of State should be satisfied that the effects on meteorological radars, civil and military aerodromes, aviation technical sites and other defence assets or operations have been addressed by the applicant and that any necessary assessment of the proposal on aviation, NSWWS or defence interests has been carried out. | **Appendix A Aviation Assessment** of **Application Document 5.9 Design Development Report** and **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics**, Recreation and Tourism consider the effects of the Project on meteorological radars, civil and military aerodromes, aviation technical sites and other defence assets or operations. |
| 5.5.52 | In particular, the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes and that realistically achievable mitigation is carried out on existing | National Grid has embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. These include sensitive routeing and siting of infrastructure and temporary works to |

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| | surveillance systems such as radar/tracking technologies. It is incumbent on Operators of aerodromes to regularly review the possibility of agreeing to make reasonable changes to operational procedures. | avoid or reduce impacts on socio-economics, recreation and tourism receptors including aviation; limiting construction activities to defined daytime core working hours, reducing general disruption to nearby communities, local businesses, and tourism/recreation receptors including aviation; and a number of other commitments made within **Application Document 7.3 Register of Environmental Actions and Commitments**. |
| 5.5.53 | When assessing the necessity, acceptability, and reasonableness of operational changes to aerodromes, the Secretary of State should be satisfied that they have the necessary information regarding the operational procedures along with any demonstrable risks or harm of such changes, taking into account the cases put forward by all parties. When making such a judgement in the case of military aerodromes, the Secretary of State should have regard to interests of defence and national security. | National Grid have engaged with aerodrome operators at an early stage to understand the potential impacts, and measures have been discussed with aerodrome owners/operators to identify suitable mitigation to the potential impacts of the overhead line on operations and recreation. One of these commitments is that the final constructed pylon locations and vertical heights will be shared to ensure Project structures can be accurately charted by the relevant aerodromes impacted as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Appendix A of **Application Document 5.9 Design Development Report** and **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** provides the necessary information regarding the operational procedures of affected aerodromes, along with the risk of harm of proposed changes as a result of the Project. |
| 5.5.61 | Where a proposed energy infrastructure development would significantly impede or compromise the safe and effective use of civil or military aviation, meteorological radars, defence assets and/or significantly limit military training, the Secretary of State may consider the use of 'Grampian conditions', or other forms of requirement which relate to the use of current or future technological solutions, to mitigate impacts on legacy CNS equipment. | As mentioned, with respect to the interactions of the Project with the Clarborough to Belmont and the Clarborough to Waddington WAM Microwave Links, engagement with the MOD DIO and assessment by National Grid is ongoing to understand the potential Project impacts on the military communications infrastructure which will be informed through the provision of detailed Project design information. To ensure the proposed overhead line does not physically affect the WAM networks the inclusion of requirements within the DCO is subject to ongoing assessment work by National Grid. |
| 5.5.62 | Where, after reasonable mitigation, operational changes, obligations and requirements have been proposed, the Secretary of State should consider whether:<br>• a development would prevent a licensed aerodrome from maintaining its licence and the operational loss of the said aerodrome would have impacts on national security and defence, or result in substantial local/national economic loss, or emergency service needs<br>• it would cause harm to aerodromes' training or emergency service needs<br>• the development would impede or compromise the safe and effective use of defence assets or unacceptably limit military training<br>• the development would have a negative impact on the safe and efficient provision of en-route air traffic control services for civil aviation, in particular through an adverse effect on CNS infrastructure<br>• the development would compromise the effective provision of weather warnings by the NSWWS, or flood warnings by the UK's flood agencies | **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** concludes that three out of the eight unlicensed aerodromes located within 500 m of the Project are anticipated to experience significant adverse impacts on commercial operations and recreational use due to the construction of the proposed overhead line as discussed above. These aerodromes are Forwood Farm Airfield, Headon Airfield, and Darlton Gliding Club. Although significant adverse impacts are expected, two of these airfields can continue their use, with only one airfield needing to permanently cease operations, as a worst case scenario. The affected airfields are currently only used for recreational activities and are not used currently for military or defence operations.<br>In addition, a high level assessment was undertaken on four additional aerodromes located further away from the Project, including Retford/Gamston Aerodrome, Humberside International Airport, Sandtoft Aerodrome, and Doncaster Sheffield Airport; however, no conflict exists between them and the Project.<br>Overall, it is concluded that as a worst case scenario, significant effects are anticipated on three unlicensed aerodromes, however, only Forwood Farm Airfield would result in the loss of training at the site. None of the aerodromes affected would have impacts on national security or defence, result in substantial local/national economic loss or emergency service needs.<br>Engagement with the MOD DIO and assessment by National Grid is ongoing to understand the potential project impacts on the military communications infrastructure which will be informed through the provision of detailed Project design information. To ensure the proposed overhead line does not physically affect the WAM networks the inclusion of requirements within the DCO is subject to ongoing assessment work by National Grid. The Project will provide information to the MOD DIO on the construction of new pylons and any removal or modifications to the siting of existing pylons so aviation chart data can be updated, and information about where crane deployments will occur to maintain the safety of military aircraft engaging in low flying training activities.<br>The Project would not compromise the effective provision of weather warnings by the NSWWS, or flood warnings by the UK's flood agencies. |

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| **5.7 Dust, Odour, Artificial Light, Smoke, Steam, and Insect Infestation** | | |
| 5.7.1 | During the construction, operation and decommissioning of energy infrastructure there is potential for the release of a range of emissions such as odour, dust, steam, smoke, artificial light and infestation of insects. All have the potential to have a detrimental impact on amenity or cause a common law nuisance or statutory nuisance under Part III, Environmental Protection Act 1990. However, they are not regulated by the environmental permitting regime, so mitigation of these impacts will need to be included in the Development Consent Order. | An assessment of the Project's potential environmental emissions on local amenity and human health has been carried out and is set out across **Application Document 6.15 Environmental Statement Chapter 15 Air Quality**, **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration**, **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**.<br>National Grid has embedded comprehensive measures into the design of the Project to avoid or reduce significant environmental effects that may otherwise be experienced by nearby communities during construction and operation (and maintenance) of the Project. These are detailed within **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>**Construction**<br>**Dust**<br>An assessment of dust emissions has been undertaken to determine whether the Project may have adverse effects on local amenity and human health. The individual construction dust risk assessments can be found in **Application Document 6.15.A2 Environmental Statement Appendix 15.2 Construction Dust Methodology and Assessment**. **Application Document 5.3 Statement of Statutory Nuisance** has considered the possibility of statutory nuisance arising in relation to dust as a result of the Project.<br>The Project does not include any proposed demolition other than the dismantling of existing pylons, which is not considered to be a dust-generating activity. The dust emissions magnitude has been determined as large for earthworks, medium for construction, and large for trackout. Combining the dust emissions magnitude and area sensitivities, the unmitigated risk of dust soiling impacts on amenity was determined to be high for earthworks and trackout, and medium for construction. Without applying mitigation measures, there would be the potential for significant effects.<br>Control and management measures are set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**. Following the implementation of these control and management measures, the temporary residual effects are anticipated to be not significant. **Application Document 5.3 Statement of Statutory Nuisance** also concludes that, with mitigation measures in place, no breach of s79(1) of the Environmental Protection Act 1990 is expected in terms of dust.<br>**Artificial Light**<br>An assessment of artificial light emissions has been undertaken to determine whether the Project may have adverse effects on local amenity and human receptors. The proposed temporary lighting requirements for the Project are described in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project** and subject to assessment in **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**. **Application Document 5.3 Statement of Statutory Nuisance** also considers the possibility of statutory nuisance arising in relation to lighting as a result of the Project.<br>Exterior and interior lighting would be provided at construction sites and compounds to allow for safe movement and the operation of equipment. All lighting would be designed in accordance with the appropriate design standards and be motion-sensor activated. A typical construction day would consist of 12 hours, which in Winter would require working in the dark at either end of the day. For the purposes of the ES, it is therefore assumed that Winter working would require lighting at certain sites, but this would not apply Project-wide. |
| 5.7.3 | Because of the potential effects of these emissions and infestation, and in view of the availability of the defence of statutory authority against nuisance claims described in Section 4.15, it is important that the potential for these impacts is considered by the applicant and Secretary of State. | |
| 5.7.4 | For energy NSIPs of the type covered by this NPS, some impact on amenity for local communities is likely to be unavoidable. The aim should be to keep impacts to a minimum, and at a level that is acceptable. | |
| 5.7.5 | The applicant should assess the potential for insect infestation and emissions of odour, dust, steam, smoke, and artificial light to have a detrimental impact on amenity, as part of the ES. | |
| 5.7.6 | In particular, the assessment provided by the applicant should describe:<br>• the type, quantity and timing of emissions<br>• aspects of the development which may give rise to emissions<br>• premises or locations that may be affected by the emissions<br>• effects of the emission on identified premises or locations<br>• measures to be employed in preventing or mitigating the emissions | |
| 5.7.8 | Mitigation measures may include one or more of the following:<br>• engineering: prevention of a specific emission at the point of generation; control, containment and abatement of emissions if generated<br>• lay-out: adequate distance between source and sensitive receptors; reduced transport or handling of material<br>• administrative: limiting operating times; restricting activities allowed on the site; implementing management plans | |
| 5.7.9 | Construction should be undertaken in a way that reduces emissions, for example the use of low emission mobile plant during the construction, and demolition phases as appropriate, and consideration should be given to making these mandatory in Development Consent Order requirements. | |
| 5.7.10 | Demolition considerations should be embedded into designs at the outset to enable demolition techniques to be adopted that remove the need for explosive demolition. | |
| 5.7.11 | A construction management plan may help clarify and secure mitigation. | |
| 5.7.12 | The Secretary of State should satisfy itself that:<br>• an assessment of the potential for artificial light, dust, odour, smoke, steam and insect infestation to have a detrimental impact on amenity has been carried out | |

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| | • that all reasonable steps have been taken, and will be taken, to minimise any such detrimental impacts | |
| 5.7.15 | In particular, the Secretary of State should consider whether to require the applicant to abide by a scheme of management and mitigation concerning insect infestation and emissions of odour, dust, steam, smoke, and artificial light from the development. The Secretary of State should consider the need for such a scheme to reduce any loss to amenity which might arise during the construction, operation and decommissioning of the development. A construction management plan may help codify mitigation at that stage. | Without applying mitigation measures, there would be the potential for temporary light spill and intrusion into adjacent properties. However, standard control and management measures are set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**. Following the implementation of these standard control and management measures, the temporary residual effects of construction lighting are anticipated to be not significant. **Application Document 5.3 Statement of Statutory Nuisance** also concludes that, with these mitigation measures secured, no breach of section 79(1) of the Environmental Protection Act 1990 is expected in terms of artificial light, as the potential for temporary lighting during construction and operation to cause a nuisance would be low, and there would be no likelihood of artificial light emissions being prejudicial to health.<br>**Steam, Insect Infestation and Odour**<br>An assessment of steam, insect infestation, and odour emissions has been undertaken to determine whether the Project may have adverse effects on local amenity and human receptors. As reported in **Application Document 5.3 Statement of Statutory Nuisance**, the Project is not anticipated to generate steam, smell, or other effluvia which could cause a nuisance or be prejudicial to health during construction or operation. Furthermore, it is not anticipated that the Project would result in any insect infestation, as no materials would be stored on-site that could attract insects. Any food waste from the temporary construction compounds would be regularly removed off-site and managed in accordance with standard procedures.<br>Without applying mitigation measures, the potential for these specific matters to affect surrounding premises remains negligible. However, to ensure general good site practice, a preliminary framework of control and management measures is set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>**Operation**<br>During the operational phase, the physical presence and normal operation of the 400 kV overhead line will generate no dust, odour, steam, smoke, or insect infestation, and there is no requirement for permanent operational artificial lighting along the alignment. Potential operational air quality and dust impacts were scoped out of detailed assessment in **Application Document 6.15 Environment Statement Chapter 15 Air Quality**, as routine maintenance and inspection activities will be limited to infrequent visual surveys, condition assessments, and minor component maintenance using light vehicles. These activities will not give rise to perceptible emissions or cause a loss of local amenity. To the extent that any non-routine maintenance or emergency refurbishment works may require localised ground access or temporary task-specific mobile lighting in future, these activities will be carried out in accordance with standard National Grid operational procedures and environmental management protocols, ensuring that Best Practicable Means (BPM) continue to be applied and that no common law or statutory nuisance under section 79(1) of the Environmental Protection Act 1990 arises over the operational lifetime of the infrastructure. Accordingly, while construction emissions are robustly codified and secured through Requirement 4 (CoCP and subordinate management plans) of the **Application Document 3.1 Draft Development Consent Order**, a separate, standalone operational mitigation scheme for these specific emissions is not necessary. |
| **5.8 Flood Risk** | | |
| 5.8.13 | A site-specific flood risk assessment should be provided for all energy projects in Flood Zones 2 and 3 in England or Defended Flood Zones and Flood Zones 2 and 3 in Wales. In Flood Zone 1 in England or Flood Zone 1 in Wales, an assessment should accompany all proposals involving:<br>• sites of 1 hectare or more<br>• land which has been identified by the EA or NRW as having critical drainage problems | **Application Document 7.13 Flood Risk Assessment** provides a site-specific flood risk assessment due to elements of the Project being located in Flood Zones 2 and 3. The Flood Risk Assessment (FRA) assesses flood risk from fluvial, pluvial (surface water), tidal, and groundwater sources, to and from the Project and demonstrates how these flood risks will be managed, taking climate change into account. Flood risk from reservoirs and other artificial sources is less relevant to the Project so has been considered in less detail. |

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| | • land identified (for example in a local authority strategic flood risk assessment) as being at increased flood risk in future<br>• land that may be subject to other sources of flooding (for example surface water)<br>• where the EA or NRW, Lead Local Flood Authority, Internal Drainage Board or other body have indicated that there may be drainage problems. | The preparation of the FRA has considered advice and taken account of consultation with key bodies, including the Environment Agency, the Lead Local Flood Authorities (LLFAs), the Isle of Axholme and North Nottinghamshire Water Level Management Board who are part of the Water Management Consortium, and the Yorkshire and Humber Internal Drainage Board.<br>The FRA has been prepared in accordance with paragraph 5.8.15. The methodology for the FRA involved a review of relevant legislation, planning policy and technical guidance to establish the assessment framework, followed by the collection and review of baseline flood risk information from published datasets, Environment Agency flood mapping, detailed hydraulic modelling outputs and relevant local authority flood risk documents. All potential sources of flooding to the Project were identified and screened, with fluvial, tidal, surface water and groundwater assessed in detail, taking into account climate change. The vulnerability of the Project to flooding and its potential to affect flood risk elsewhere were assessed for the construction and operational phases. The sequential approach to siting was applied, and where required, the Exception Test was undertaken.<br>National Grid has made a number of commitments around flood risk management measures. These include embedded and additional mitigation measures, which are listed within **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments** as secured by **Application Document 3.1 Draft Development Consent Order** which requires detailed management plans to be submitted and approved by the relevant local planning authority. They also include good practice measures. With these measures in place, **Application Document 6.11 Environmental Statement Chapter 11 Water Environment** concludes that the risk to some temporary construction worksites from fluvial and tidal flooding would be medium, and the risk from surface water and groundwater would be low. Therefore, the Project would not result in any significant effects in relation to temporary effects on flood risk and drainage during construction of the Project.<br>**Application Document 7.13 Flood Risk Assessment** concludes that during the operational phase, the Project is considered to be at low risk of flooding from all sources assessed due to the mitigation measures built into its design. The Project is not anticipated to increase flood risk elsewhere during its operation as any losses of floodplain storage would be compensated for. New impermeable surfaces would be very localised to pylon bases and rainfall runoff from these areas would be attenuated by surrounding reinstated vegetation and would soak back into the ground. Overall, following the implementation of embedded and additional mitigation measures including compensatory floodplain storage**, Application Document 6.11 Environmental Statement Chapter 11 Water Environment** concludes that the Project would not result in any significant effects in relation to flood risk and drainage during operation.<br>In conclusion, the FRA demonstrates that the requirements set out in paragraphs 5.8.13 and 5.8.15 of NPS EN-1, and the flood risk management measures identified would be secured through the **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, and **Application Document 3.1 Draft Development Consent Order**. |
| 5.8.14 | This assessment should identify and assess the risks of all forms of flooding to and from the project and demonstrate how these flood risks will be managed, taking climate change into account. | |
| 5.8.15 | The minimum requirements for Flood Risk Assessments (FRA) are that they should:<br>• Be proportionate to the risk and appropriate to the scale, nature and location of the project;<br>• Consider the risk of flooding arising from the project in addition to the risk of flooding to the project;<br>• Take the impacts of climate change into account, across a range of climate scenarios, clearly stating the development lifetime over which the assessment has been made;<br>• Be undertaken by competent people, as early as possible in the process of preparing the proposal;<br>• Consider both the potential adverse and beneficial effects of flood risk management infrastructure, including raised defences, flow channels, flood storage areas and other artificial features, together with the consequences of their failure and exceedance;<br>• Consider the vulnerability of those using the site, including arrangements for safe access and escape;<br>• Consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and include information on flood likelihood, speed-of-onset, depth, velocity, hazard and duration;<br>• Identify and secure opportunities to reduce the causes and impacts of flooding overall, making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management;<br>• Consider the effects of a range of flooding events including extreme events on people, property, the natural and historic environment and river and coastal processes;<br>• Include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that these risks can be safely managed, ensuring people will not be exposed to hazardous flooding;<br>• Consider how the ability of water to soak into the ground may change with development, along with how the proposed layout of the project may affect drainage systems. Information should include:<br>– Describe the existing surface water drainage arrangements for the site;<br>– Set out (approximately) the existing rates and volumes of surface water run-off generated by the site. Detail the proposals for restricting discharge rates;<br>– Set out proposals for managing and discharging surface water from the site using sustainable drainage systems and accounting for the predicted impacts of climate change. If sustainable drainage systems have been rejected, present clear evidence of why their inclusion would be inappropriate;<br>– Demonstrate how the hierarchy of drainage options has been followed; | |

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| | – Explain and justify why the types of SuDS and method of discharge have been selected and why they are considered appropriate;<br>– Explain how sustainable drainage systems have been integrated with other aspects of the development such as open space or green infrastructure, so as to ensure an efficient use of the site;<br>– Describe the multifunctional benefits the sustainable drainage system will provide;<br>– Set out which opportunities to reduce the causes and impacts of flooding have been identified and included as part of the proposed sustainable drainage system;<br>– Explain how run-off from the completed development will be prevented from causing an impact elsewhere;<br>– Explain how the sustainable drainage system been designed to facilitate maintenance and, where relevant, adoption. Set out plans for ensuring an acceptable standard of operation and maintenance throughout the lifetime of the development;<br>• Detail those measures that will be included to ensure the development will be safe and remain operational during a flooding event throughout the development's lifetime without increasing flood risk elsewhere;<br>• Identify and secure opportunities to reduce the causes and impacts of flooding overall during the period of construction; and<br>• Be supported by appropriate data and information, including historical information on previous events. | |
| 5.8.17 | Development (including construction works) will need to account for any existing watercourses and flood and coastal erosion risk management structures or features, or any land likely to be needed for future structures or features so as to ensure:<br>• Access, clearances and sufficient land are retained to enable their maintenance, repair, operation, and replacement, as necessary;<br>• Their standard of protection is not reduced; and<br>• Their condition or structural integrity is not reduced | Existing watercourses and flood and coastal erosion risk management structures or features have been taken into account in the assessment of the Project on flood risk and the water environment, as set out in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**.<br>Measures to ensure their protection and access are set out in **Application Document 7.2 Outline Code of Construction Practice and Application Document 7.3 Register of Environmental Actions and Commitments**. |
| 5.8.18 | Applicants for projects which may be affected by, or may add to, flood risk should arrange pre-application discussions before the official preapplication stage of the NSIP process with the EA or NRW, and, where relevant, other bodies such as Lead Local Flood Authorities, Internal Drainage Boards, sewerage undertakers, navigation authorities, highways authorities and reservoir owners and operators. | Stakeholder engagement has formed a key part of the Project development since the Project's inception. National Grid has undertaken consultation with relevant bodies and the feedback received has informed the development of the Project, including the non-statutory consultation in 2023, localised non-statutory consultation in 2024 and statutory consultation in 2025. Further details on the consultation events can be found in **Application Document 5.1 Consultation Report**.<br>National Grid has also undertaken a number of environmental and thematic meetings with environmental organisations to gather information about the baseline environment, scope of the assessment and potential effects and proposed mitigation. **Application Document 7.13 FRA** has been informed by consultation and engagement with the relevant flood risk management authorities (the Environment Agency and LLFAs (East Riding of Yorkshire Council, North Lincolnshire Council, Nottinghamshire County Council)) and the Internal Drainage Boards. |
| 5.8.19 | Such discussions should identify the likelihood and possible extent and nature of the flood risk, help scope the FRA, and identify the information that will be required by the Secretary of State to reach a decision on the application when it is submitted. The Secretary of State should advise applicants to undertake these steps where they appear necessary but have not yet been addressed. | |
| 5.8.20 | If the EA, NRW or another flood risk management authority has reasonable concerns about the proposal on flood risk grounds, the applicant should discuss these concerns with the EA or NRW and take all reasonable steps to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the authority's concerns. | |

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| 5.8.21 | The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites with medium risk areas and then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas. | As set out in **Application Document 7.13 Flood Risk Assessment**, a sequential approach has been taken in siting the Project infrastructure. Given the linear nature of the Project, its large geographical scale, and its location, avoidance of all areas of fluvial/tidal floodplain and areas at high/medium risk of surface water flooding is not practicable. Works in these areas, however, would be largely temporary, associated with construction of the Project. The FRA concludes that these risks would be reduced and managed by implementing a range of mitigation measures set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, including those detailed in a Flood Warning and Evacuation Plan, and by programming construction activities in floodplains to avoid periods of likely high river levels where practicable.<br>The siting of pylons within the defended floodplain has largely been avoided along the Project route. However, due to the sequential approach to siting infrastructure, some operational Project components, namely pylons, must necessarily be located in Flood Zones 2 and 3 with some areas being within the floodplain. Following consultation with the Environment Agency it was stipulated that compensatory storage for pylons within the floodplain would be required. Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 Flood Risk Assessment** sets out the proposed location of floodplain storage compensation areas that are proposed on land outside of the floodplain. Following the implementation of this compensatory storage, the Project would bring significant benefits via its delivery of safe, reliable, and renewable electricity; would not result in an increase in flood risk elsewhere; and has been designed to be resilient to flooding throughout its lifetime. |
| 5.8.22 | The technology specific NPSs set out some exceptions to the application of the Sequential Test. However, when seeking development consent on a site allocated in a development plan through the application of the Sequential Test, informed by a strategic flood risk assessment, applicants need not apply the Sequential Test, provided the proposed development is consistent with the use for which the site was allocated and there is no new flood risk information that would have affected the outcome of the test. | |
| 5.8.23 | Consideration of alternative sites should take account of the policy on alternatives set out in Section 4.3. All projects should apply the Sequential Test to locating development within the site. | |
| 5.8.24 | To satisfactorily manage flood risk, arrangements are required to manage surface water and the impact of the natural water cycle on people and property. | **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments** include mitigation measures to reduce the impacts of these activities on land drainage and surface water flood risk.<br>Temporary infrastructure such as construction compounds, lay down areas (as well as areas where impermeable material will be installed where heavy equipment would be used) and construction access routes would be drained using sustainable drainage systems (SuDS) techniques that are suitable for local ground conditions and topography. These areas will be reinstated after completion of the temporary works, as agreed with the landowner. This is committed to in **Application Document 7.3 Register of Environmental Actions and Commitments** which is secured by **Application Document 3.1 Draft Development Consent Order**.<br>An exception to this is Birkhill Wood compound which is located in a Source Protection Zone 1, where all discharges would be collected and removed from site by tanker as set out in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment** and secured in **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Access roads and haul roads, as well as areas where impermeable material will be installed where heavy equipment would be used, will also have suitable drainage provisions via appropriate SuDS that will provide attenuation and treatment of runoff. The details of appropriate surface water drainage measures to be used for any access tracks will be incorporated into the final design so that they do not lead to a significant increase in flood risk as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**. |
| 5.8.25 | In this NPS, the term SuDS refers to the whole range of sustainable approaches to surface water drainage management including, where appropriate:<br>• Source control measures including rainwater recycling and drainage;<br>• Infiltration devices to allow water to soak into the ground, that can include individual soakaways and communal facilities;<br>• Filter strips and swales, which are vegetated features that hold and drain water downhill mimicking natural drainage patterns;<br>• Filter drains and porous pavements to allow rainwater and run-off to infiltrate into permeable material below ground and provide storage if needed;<br>• Basins, ponds and tanks to hold excess water after rain and allow controlled discharge that avoids flooding; and<br>• Flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding. | |
| 5.8.26 | Site layout and surface water drainage systems should cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts. | |
| 5.8.27 | The surface water drainage arrangements for any project should, accounting for the predicted impacts of climate change throughout the development's lifetime, be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect. | |
| 5.8.28 | It may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. | |

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| | There may be circumstances where it is appropriate for infiltration facilities or attenuation storage to be provided outside the project site, if necessary, through the use of a planning obligation. | |
| 5.8.29 | The sequential approach should be applied to the layout and design of the project. Vulnerable aspects of the development should be located on parts of the site at lower risk and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife habitat and flood storage uses. Opportunities should be taken to lower flood risk by reducing the built footprint of previously developed sites and using SuDS. | The FRA concludes that from the outset of the Project, a sequential approach has been taken to siting infrastructure for the Project, particularly those elements that are vulnerable to inundation, as evidenced in **Application Document 7.17 Strategic Options Report Including Needs Case**. The water environment and flood risk were considered in the early stages of siting and design and embedded measures have been intrinsic to the design of the Project to reduce and where possible avoid flood risks and impacts on the water environment. Embedded mitigation measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, which is secured by **Application Document 3.1 Draft Development Consent Order**.<br>During construction, the FRA concludes that following the application of a sequential approach and a lack of proximate feasible alternatives as detailed in **Application Document 7.17 Strategic Options Report Including Needs Case**, three construction compounds are located in Flood Zone 3, in addition to some temporary haul roads and construction access which must necessarily be located in Flood Zones 2 and 3. The FRA concludes however, that these risks would be reduced and managed by implementing a range of mitigation measures set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, including those detailed in a Flood Warning and Evacuation Plan, and by programming construction activities in floodplains to avoid periods of likely high river levels where practicable. Following the implementation of these measures, the residual risk is medium for fluvial and tidal flooding, and low for surface water and groundwater. Overall this results in no significant effects, as set out in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**.<br>During operation, due to its linear nature and the geographical extent of the Project, while the siting of pylons within the defended floodplain has largely been avoided along the Project route due to the sequential approach to siting infrastructure, some operational Project components, namely pylons, must necessarily be located in Flood Zones 2 and 3 with some areas being within the floodplain.<br>The Exception Test is therefore triggered, and the FRA concludes that, with regard to the first part of the test, the Project is a NSIP that would play an important role in delivering renewable electricity efficiently, reliably and safely and would support the UK's move towards net zero; therefore, it would provide wider sustainability benefits to the community that outweigh flood risk.<br>With regard to the second part of the test, permanent Project infrastructure which lies within areas at risk of fluvial or tidal flooding only comprises a small number of pylons. These pylons are resilient to flooding, given their concrete bases and metal lattice structures which would not be impacted by floodwaters, and so ensure the Project would be safe and could continue to operate in times of flood. A suite of measures would be adopted, as described in Table 3.1 of **Application Document 7.13 Flood Risk Assessment** and also set out in **Application Document 7.3 Register of Environmental Actions and Commitments** which is secured by **Application Document 3.1 Draft Development Consent Order**, to prevent flood risk increases during operation (including maintenance) of the Project.<br>Following consultation with the Environment Agency it was stipulated that compensatory storage for pylons within the floodplain would be required. Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 FRA** sets out the proposed location of floodplain storage compensation areas that are proposed on land outside of the floodplain.<br>The flood storage compensation proposals outlined in Appendix A Flood Compensation Storage Technical Note provide evidence that the Project, on the implementation of flood compensation areas within the same floodplain cell, will not increase the overall water level and therefore does not increase flood risk elsewhere. Furthermore, a conservative approach to calculating floodplain |
| 5.8.30 | Where a development may result in an increase in flood risk elsewhere through the loss of flood storage, on-site level-for-level compensatory storage, accounting for the predicted impacts of climate change over the lifetime of the development, should be provided. | |
| 5.8.33 | The receipt of and response to warnings of floods is an essential element in the management of the residual risk of flooding. Flood Warning and evacuation plans should be in place for those areas at an identified risk of flooding. | |
| 5.8.34 | The applicant should take advice from the local authority emergency planning team, emergency services and, where appropriate, from the local resilience forum when producing an evacuation plan for a manned energy project as part of the FRA. Any emergency planning documents, flood warning and evacuation procedures that are required should be identified in the FRA. | |
| 5.8.36 | In determining an application for development consent, the Secretary of State should be satisfied that where relevant:<br>• The application is supported by an appropriate FRA;<br>• The Sequential Test has been applied and satisfied as part of site selection (subject to the exception set out in paragraph 5.8.22 of this NPS, and any technology specific exceptions set out in other NPSs);<br>• A sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk;<br>• The proposal is in line with any relevant national and local flood risk management strategy;<br>• SuDS (as required in the next paragraph on National Standards) have been used unless there is clear evidence that their use would be inappropriate;<br>• In flood risk areas the project is designed and constructed to remain safe and operational during its lifetime, without increasing flood risk elsewhere (subject to the exceptions set out in paragraph 5.8.22);<br>• The project includes safe access and escape routes where required, as part of an agreed emergency plan, and that any residual risk can be safely managed over the lifetime of the development; and<br>• Land that is likely to be needed for present or future flood risk management infrastructure has been appropriately safeguarded from development to the extent that development would not prevent or hinder its construction, operation or maintenance. | |

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| | | storages losses was taken, meaning the suggested volume for compensation areas likely exceeds the requirement. As such, there is the opportunity for the Project to reduce flood risk overall via these floodplain storage compensation areas. This is in accordance with paragraph 5.8.41 of NPS EN-1.<br>It is therefore concluded that during the operational phase, the Project is considered to be at low risk of flooding from all sources assessed due to the mitigation measures built into its design. The Project is not anticipated to increase flood risk elsewhere during its operation as any losses of floodplain storage would be compensated for. New impermeable surfaces would be very localised to pylon bases and rainfall runoff from these areas would be attenuated by surrounding reinstated vegetation and would soak back into the ground.<br>The Exception Test is therefore concluded to be satisfied, as the Project would bring significant benefits via its delivery of safe, reliable, and renewable electricity; would not result in an increase in flood risk elsewhere; and has been designed to be resilient to flooding throughout its lifetime. |
| 5.8.37 | For energy projects which have drainage implications, approval for the project's drainage system, including during the construction period, will form part of the development consent issued by the Secretary of State. The Secretary of State will therefore need to be satisfied that the proposed drainage system complies with any National Standards published by Ministers under paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010. | The Project will incorporate appropriate surface water drainage measures into the final design for any access tracks so that they do not lead to a significant increase in flood risk as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**. Measures are also included in **Application Document 7.3 Register of Environmental Actions and Commitments** to reduce effects on the hydromorphology of watercourses to be crossed by the Project and to manage site drainage and existing land drainage systems (including agricultural drainage) during construction and operation (and maintenance) of the Project.<br>Details of the surface water drainage systems will be confirmed during the detailed design stage of the Project as secured by **Application Document 3.1 Draft Development Consent Order**. In accordance with the requirement, National Grid will submit a surface water management plan prepared substantially in accordance with the framework construction surface water management plan (Appendix B of **Application Document 7.13 Flood Risk Assessment**).<br>As set out in **Application Document 7.13 Flood Risk Assessment** the Project is not anticipated to increase flood risk elsewhere during its operation (including maintenance) as any losses of floodplain storage would be compensated for. New impermeable surfaces would be very localised to pylon bases and rainfall runoff from these areas would be attenuated by surrounding reinstated vegetation and would soak back into the ground. Furthermore, a conservative approach to calculating floodplain storages losses was taken, meaning the suggested volume for compensation areas likely exceeds the requirement. As such, there is the opportunity for the Project to reduce flood risk overall via these floodplain storage compensation areas. |
| 5.8.39 | Where relevant, the Secretary of State should be satisfied that the most appropriate body is being given the responsibility for maintaining any SuDS, taking into account the nature and security of the infrastructure on the proposed site. Responsible bodies could include, for example the landowner, the relevant lead local flood authority or water and sewerage company (through the Ofwat-approved Sewerage Sector Guidance), or another body, such as an Internal Drainage Board. | |
| 5.8.41 | Energy projects should not normally be consented within Flood Zone 3b, or Zone C2 in Wales, or on land expected to fall within these zones within its predicted lifetime. This may also apply where land is subject to other sources of flooding (for example surface water). However, where essential energy infrastructure has to be located in such areas, for operational reasons, they should only be consented if the development will not result in a net loss of floodplain storage, and will not impede water flows. | |
| 5.8.42 | Exceptionally, where an increase in flood risk elsewhere cannot be avoided or wholly mitigated, the Secretary of State may grant consent if they are satisfied that the increase in present and future flood risk can be mitigated to an acceptable and safe level and taking account of the benefits of, including the need for, nationally significant energy infrastructure as set out in Part 3 above. In any such case the Secretary of State should make clear how, in reaching their decision, they have weighed up the increased flood risk against the benefits of the project, taking account of the nature and degree of the risk, the future impacts on climate change, and advice provided by the EA or NRW and other relevant bodies. | As set out in **Application Document 7.13 Flood Risk Assessment**, the Project would bring significant benefits via its delivery of safe, reliable, and renewable electricity; would not result in an increase in flood risk elsewhere; and has been designed to be resilient to flooding throughout its lifetime. |
| **5.9 Historic Environment** | | |
| 5.9.11 | The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES (see Section 4.3). This should include consideration of heritage assets above, at, and below the surface of the ground. Consideration will also need to be given to the possible impacts, including cumulative, on | **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** provides an assessment of likely effects of the Project on designated and non-designated heritage assets during construction, and operation and maintenance of the Project, along with how the mitigation hierarchy has been applied. The chapter is supported by **Application Document 6.10.A2 Environmental Statement Appendix 10.2 Cultural Heritage Baseline Report** which lists and |

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| | the wider historic environment. The assessment should include reference to any historic landscape or seascape character assessment and associated studies as a means of assessing impacts relevant to the proposed project. | describes the designated and non-designated heritage assets relevant to the Project. Designated heritage assets are illustrated on **Application Document 6.10.F1 Environmental Statement Figure 10.1 Designated Heritage Assets within Study Areas**. It includes heritage assets above, at and below the surface of the ground.<br>**Application Document 6.20 Environmental Statement Chapter 20 Intra-project Cumulative Effects and Application Document 6.21 Environmental Statement Chapter 21 Inter-project Cumulative Effects** respectively assess the intra- and inter-project cumulative effects of the Project, which includes impacts on the historic environment.<br>**Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** provides reference to character assessments and studies that have been considered in its assessment of effects on heritage. |
| 5.9.12 | As part of the ES the applicant should provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by their setting. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum, the applicant should have consulted the relevant Historic Environment Record (or, where the development is in English or Welsh waters, Historic England or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact. | **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** provides an assessment of likely effects of the Project on designated and non-designated heritage assets during construction and operation and maintenance of the Project. The chapter is supported by the following relevant appendices:<br>• **Application Document 6.10.A2 Environmental Statement Appendix 10.2 Cultural Heritage Baseline Report**; which lists and describes the designated and non-designated heritage assets relevant to the Project, their significance and contribution made by their setting.<br>• **Application Document 6.10.A3 Cultural Heritage Visualisations**; provides visualisations of the viewpoints used in the cultural heritage assessment.<br>• **Application Document 6.10.A4 Appendix 10.4 Cultural Heritage Gazeteers**; which lists all designated heritage assets within the study area.<br>Designated heritage assets are also illustrated on **Application Document 6.10.F1 Environmental Statement Figure 10.1 Designated Assets Within Study Areas**.<br>National Grid has consulted the relevant Historic Environment Record as part of the assessment of effects. |
| 5.9.13 | Where a site on which development is proposed 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, accurate representative visualisations may be necessary to explain the impact. | **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** is supported by a desk-based assessment, presented in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report**, and has been informed by the results of archaeological assessment and fieldwork surveys, comprising:<br>• **Application Document 6.10.A5 Appendix 10.5 Aerial Photography and LiDAR Report**;<br>• **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report**;<br>• **Application Document 6.10.A7 Appendix 10.7 Geoarchaeological Desk-based Assessment**; and<br>• **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report**.<br>Wireline visualisations have also been produced to support the setting assessment and are provided in **Application Document 6.10.A3 Appendix 10.3 Cultural Heritage Visualisations**. |
| 5.9.14 | 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. Studies will be required on those heritage assets affected by noise, vibration, light and indirect impacts, the extent and detail of these studies will be proportionate to the significance of the heritage asset affected. | **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** and a Heritage Statement of Harm (Appendix A of **Application Document 5.5. Planning Statement**) have been prepared which adequately set out the level of significance of heritage assets and the level of impact or harm resulting from the Project on heritage assets. The impacts of noise, vibration, light and indirect impacts are considered and are clearly set out in the assessment in **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage.** |

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| 5.9.15 | The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected. This can include, where possible:<br>• Enhancing, through a range of measures such a sensitive design, the significance of heritage assets or setting affected;<br>• Considering where required the development of archive capacity which could deliver significant public benefits; and<br>• Considering how visual or noise impacts can affect heritage assets, and whether there may be opportunities to enhance access to, or interpretation, understanding and appreciation of, the heritage assets affected by the scheme. | **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** sets out that the Project has been designed to avoid or minimise impacts to heritage assets, where feasible. Embedded mitigation measures, which avoid or reduce significant effects to heritage assets through a range of measures including sensitive design, are detailed in section 10.8.<br>Discussions with the Archaeological Advisors to the relevant local planning authorities noted that the structure of museum services would likely change following local government reform and therefore options for archive development should be deferred until the structure of the new unitary authorities was understood. Opportunities to develop archive capacity will continue to be explored with the relevant Archaeological Advisors and is included in **Application Document 7.10 Outline Cultural Heritage Management Plan**.<br>Section 10.9 of **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** considers potential impacts to heritage assets arising from visual and/or noise intrusion.<br>Opportunities to enhance the interpretation, understanding and appreciation of heritage assets affected by the Project will be informed, in part, by the results of archaeological works set out in **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**. As such, **Application Document 7.10 Outline Cultural Heritage Management Plan** includes provision for feasible enhancement measures to be discussed and agreed between the Applicant and the Archaeological Advisors to the relevant local planning authorities. . |
| 5.9.16 | Careful consideration in preparing the scheme will be required on whether the impacts on the historic environment will be direct or indirect, temporary, or permanent. | National Grid has undertaken an iterative design process taking account of policy requirements, historic landscape character assessments and desk-based and fieldwork analysis in order to minimise and avoid, where possible, harm to the historic environment. In accordance with the mitigation hierarchy, the design of the Project has sought to avoid, reduce or mitigate potentially significant adverse effects on designated and non-designated heritage assets. Design decisions have been made to balance the need to avoid and reduce impacts on heritage assets, along with other environmental, social and operational considerations. Embedded mitigation measures are also incorporated into the design to minimise impacts as far as practicable, as secured in **Application Document 7.3 Register of Environmental Actions and Commitments.**<br>The Heritage Statement of Harm (Appendix A of **Application Document 5.5 Planning Statement**) concludes that in total, the Project would result in less than substantial harm to 66 heritage assets, which comprises 59 designated heritage assets, six conservation areas and one non-designated asset. Most of this harm is at the lower end of the scale, with nine designated heritage assets and one conservation area at the middle of the scale, and one designated heritage asset (Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190) which is a scheduled monument) at the higher end of the scale. The Project would not result in substantial harm to any designated or non-designated heritage assets. .<br>With regard to less than substantial harm at the higher end of the scale for Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190), it was acknowledged during the routeing and siting exercise in in **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** that the preferred alignment would adversely affect the setting of the Hall Garth Moated site. This harm was deemed to be unavoidable, due to the need to avoid the significant and number of potential impacts of alternative routes in this location, including effects on the nationally and internationally designated nature conservation sites of the Humber Estuary and the protected and qualifying bird species at RSPB Blacktoft Sands Nature Reserve, as well as impacts to Grade II listed buildings, residential properties in Ousefleet and in proximity to an eastern route, Ousefleet Village Hall and playing field, agricultural practices and potential further complexities of additional line swaps.<br>Works within the boundary of Hall Garth would only consist of the removal of an existing wood pole electricity line, owned by Northern PowerGrid, which is proposed to be cabled underground beyond the site boundary, in order to avoid direct impacts to the heritage asset. |
| 5.9.18 | A documentary record of our past is not as valuable as retaining the heritage asset, and therefore the ability to record evidence of the asset should not be a factor in deciding whether such loss should be permitted, and whether or not consent should be given. | |
| 5.9.19 | Where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State will require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part). The extent of the requirement should be proportionate to the asset's importance and significance and the impact. The applicant should be required to publish this evidence and to deposit copies of the reports with the relevant Historic Environmental Record. They should also be required to deposit the archive generated in a local museum or other public repository willing to receive it. | |
| 5.9.20 | Where appropriate, the Secretary of State will impose requirements on the Development Consent Order to ensure that the work is undertaken in a timely manner, in accordance with a written scheme of investigation that complies with the policy in this NPS and which has been agreed in writing with the relevant local authority, and to ensure that the completion of the exercise is properly secured. | |

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| | | In addition, **Application Document 7.3 Register of Environmental Actions and Commitments** commits to measures relating to third-party access track to NPG-017 as shown on **Application Document 6.4.F4 Environmental Statement Figure 4.4 Third Party Works** within the boundary of the Scheduled Monument Hall Garth Moated site (NHLE 1013190). These include no breaking of topsoil and/or below ground disturbance for the duration of the works, and track matting or a similar protected surface will be laid to allow for the movement of construction vehicles to and from the works area.<br>As set out in in **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** where it has not been feasible to design avoidance measures for archaeological remains that would be impacted by the Project, or where the heritage value of the archaeological remains does not merit preservation in situ, they will be archaeologically excavated and recorded in advance of construction activities. The programme of pre-construction archaeological works, which has been agreed with Historic England and the Archaeological Advisors to the relevant local planning authorities, and which includes on-site recording, post-excavation assessment, analysis, publication, and archiving, is secured through **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**.<br>Control and management measures to mitigate the impacts of construction on heritage assets will be carried out in accordance with **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**. These include the appointment of a suitably qualified Archaeological Clerk of Works (ACoW) to oversee the delivery of all necessary further archaeological evaluation and mitigation measures. Some archaeological works, comprising further archaeological evaluation and detailed archaeological excavation, will be carried out at the pre-construction phase, secured through **Application Document 7.9 Outline Archaeological Written Scheme of Investigation** and subsequent site-specific written schemes of investigation. Archaeological works and management measures during the construction, operation and maintenance phases will be secured through **Application Document 7.10 Outline Cultural Heritage Management Plan**. |
| 5.9.21 | Where the loss of significance of any heritage asset has been justified by the applicant on the merits of the new development and the significance of the asset in question, the Secretary of State should consider:<br>• Imposing a requirement in the Development Consent Order; and<br>• Requiring the applicant to enter into an obligation that will prevent the loss occurring until the relevant part of the development has commenced, or it is reasonably certain that the relevant part of the development is to proceed. | Requirement 4 of **Application Document 3.1 Draft Development Consent Order** sets out that no stage of the authorised development may commence until, for that stage, the archaeological written scheme of investigation (which must be substantially in accordance with the outline archaeological written scheme of investigation); and the cultural heritage management plan (which must be substantially in accordance with the outline cultural heritage management plan) as relevant to that stage have been submitted to and approved by the relevant planning authority. |
| 5.9.22 | Where there is a high probability (based on an adequate assessment) that a development site may include as yet undiscovered heritage assets with archaeological interest, the Secretary of State will consider requirements to ensure appropriate procedures are in place for the identification and treatment of such assets discovered during construction. | |
| 5.9.23 | In determining applications, the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development, including by development affecting the setting of a heritage asset, taking account of:<br>• Relevant information provided with the application and, where applicable, relevant information submitted during the examination of the application;<br>• Any designation records, including those on the National Heritage List for England, or included on Cof Cymru for Wales;<br>• Historic landscape character records; | As set out above, **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** provides an assessment of likely effects of the Project on designated and non-designated heritage assets during construction, and operation and maintenance of the Project, along with how the mitigation hierarchy has been applied.<br>**Application Document 6.20 Environmental Statement Chapter 20 Intra-project Cumulative Effects and Application Document 6.21 Environmental Statement Chapter 21 Inter-project Cumulative Effects** respectively assess the intra- and inter-project cumulative effects of the Project, which includes impacts on the historic environment. |

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| | • The relevant Historic Environment Record(s), and similar sources of information;<br>• Representations made by interested parties during the examination process; and<br>• Expert advice, where appropriate, and when the need to understand the significance of the heritage asset demands it. | **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** provides reference to character assessments and studies that have been considered in its assessment of effects on heritage. It is supported by the following relevant appendices:<br>• **Application Document 6.10.A2 Environmental Statement Appendix 10.2 Cultural Heritage Baseline Report;** which lists and describes the designated and non-designated heritage assets relevant to the Project, their significance and contribution made by their setting.<br>• **Application Document 6.10.A3 Cultural Heritage Visualisations**; provides visualisations of the viewpoints used in the cultural heritage assessment.<br>• **Application Document 6.10.A4 Appendix 10.4 Cultural Heritage Gazeteers**; which lists all designated heritage assets within the study area.<br>**Designated heritage assets are also illustrated on Application Document 6.10.F1 Environmental Statement Figure 10.1 Designated Assets Within Study Areas**.<br>National Grid has consulted the relevant Historic Environment Record as part of the assessment of effects.<br>**Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report** has been informed by the results of archaeological assessment and fieldwork surveys, comprising:<br>• **Application Document 6.10.A5 Appendix 10.5 Aerial Photography and LiDAR Report**;<br>• **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report**;<br>• **Application Document 6.10.A7 Appendix 10.7 Geoarchaeological Desk-based Assessment**; and<br>• **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report**.<br>Wireline visualisations have also been produced to support the setting assessment and are provided in **Application Document 6.10.A3 Appendix 10.3 Cultural Heritage Visualisations**.<br>**Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** and a **Heritage Statement of Harm** (**Appendix A of Application Document 5.5. Planning Statement**) have been prepared which adequately set out the level of significance of heritage assets and the level of impact or harm resulting from the Project on heritage assets. The impacts of noise, vibration, light and indirect impacts are considered and are clearly set out in the assessment in **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage**. |
| 5.9.24 | The Secretary of State must also comply with the requirements on listed buildings, conservation areas and scheduled monuments, set out in regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010. | Cultural heritage matters were considered in the early stages of siting and design of the Project and the Project has undergone an iterative design process in order to minimise and avoid, where possible, harm to the historic environment. **Application Document 7.17 Strategic Options Report Including Needs Case** and **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** provide the rationale for identifying the wider area within which the Project is located, and the preferred corridor the route should take. Once the need for the Project had been established, as set out in **Application Document 7.17 Strategic Options Report Including Needs Case** and section 3 of **Application Document 5.5 Planning Statement,** National Grid considered the different ways this need could be met to generate a preferred strategic option. Four options were considered at this stage with different geographical connection points. For each option, the technology options available for transmission system reinforcement, environmental and socio-economic constraints including cultural heritage, lifetime costs of each technology option, as well as initial capital costs, were considered. The strategic options considered and the reasons for the selection of the preferred option are set out in **Application Document 7.17 Strategic Options Report Including Needs Case**.<br>**Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** and **Application Document 6.10.A2 Environmental Statement Appendix 10.2 Cultural Heritage Baseline Report** clearly sets out the particular nature of significance to heritage assets and the |
| 5.9.25 | In considering the impact of a proposed development on any heritage assets, the Secretary of State should consider the particular nature of the significance of the heritage assets and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and any aspect of the proposal. | |

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| | | value they hold. This understanding which has been part of the design development of the Project has been used to avoid or minimise conflict between heritage assets and the Project as far as practicable. |
| 5.9.28 | When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance. | The Heritage Statement of Harm (Appendix A of **Application Document 5.5 Planning Statement**) concludes that in total, the Project would result in less than substantial harm to 66 heritage assets, which comprises 59 designated heritage assets, six conservation areas and one non-designated asset. Most of this harm is at the lower end of the scale, with nine designated heritage assets and one conservation area at the middle of the scale, and one designated heritage asset (Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190) which is a scheduled monument) at the higher end of the scale. The Project would not result in substantial harm to any designated or non-designated heritage assets.<br>In accordance with NPS EN-1 paragraphs 5.9.29 and 5.9.33, the NPPF and NPPG, the substantial public benefits and need for the Project, are considered to clearly and demonstrably outweigh the less than substantial harm at the lower end, the less than substantial harm at the middle of the scale, and the less than substantial harm at the higher end of the scale to the designated and non-designated heritage assets affected.<br>With regard to less than substantial harm at the higher end of the scale for Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190), it was acknowledged during the routeing and siting exercise in in **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** that the preferred alignment would adversely affect the setting of the Hall Garth Moated site. This harm was deemed to be unavoidable, due to the need to avoid the significant and number of potential impacts of alternative routes in this location, including effects on the nationally and internationally designated nature conservation sites of the Humber Estuary and the protected and qualifying bird species at RSPB Blacktoft Sands Nature Reserve, as well as impacts to Grade II listed buildings, residential properties in Ousefleet and in proximity to an eastern route, Ousefleet Village Hall and playing field, agricultural practices and potential further complexities of additional line swaps.<br>Works within the boundary of Hall Garth would only consist of the removal of an existing wood pole electricity line, owned by Northern PowerGrid, which is proposed to be cabled underground beyond the site boundary, in order to avoid direct impacts to the heritage asset.<br>In addition, **Application Document 7.3 Register of Environmental Actions and Commitments** commits to measures relating to third-party access track to NPG-017 as shown on **Application Document 6.4.F4 Environmental Statement Figure 4.4 Third Party Works** within the boundary of the Scheduled Monument Hall Garth Moated site (NHLE 1013190). These include no breaking of topsoil and/or below ground disturbance for the duration of the works, and track matting or a similar protected surface will be laid to allow for the movement of construction vehicles to and from the works area.<br>Although the Project results in significant effects to designated heritage assets, there would be no substantial harm to any designated or non-designated heritage assets. It is considered that the overriding public benefits and need for the Project (as outlined in section 3 and 7 of **Application Document 5.5 Planning Statement**) would clearly and demonstrably outweigh the significant and less than substantial harm to heritage assets. |
| 5.9.29 | The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification. | |
| 5.9.30 | Substantial harm to or loss of significance of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional. | |
| 5.9.31 | Substantial harm to or loss of significance of assets of the highest significance, including Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II* Listed Buildings; grade I and II* Registered Parks and Gardens; and World Heritage Sites, should be wholly exceptional. | |
| 5.9.32 | Where the proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to, or loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss, or all the following apply:<br>• The nature of the heritage asset prevents all reasonable uses of the site;<br>• No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;<br>• Conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and<br>• The harm or loss is outweighed by the benefit of bringing the site back into use. | |
| 5.9.33 | Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use. | |
| 5.9.34 | In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. | |
| 5.9.37 | When considering applications for development affecting the setting of a designated heritage asset, the Secretary of State should give appropriate weight to the desirability of preserving the setting of such assets and treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the Secretary of State should give great weight to any negative effects, when weighing them against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval. | |

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| **5.10 Landscape and Visual** | | |
| 5.10.16 | The applicant should carry out a landscape and visual impact assessment and report it in the ES, including cumulative effects (see Section 4.3). Several guides have been produced to assist in addressing landscape issues. | The landscape and visual impacts of the Project, taking into consideration landscape guides, are assessed in **Application Document 6.6 Environmental Statement Chapter 6 Landscape and Application Document 6.7 Environmental Statement Chapter 7 Visual** which are accompanied by the following:<br>• **Application Document 6.6.A2 Environmental Statement Appendix 6.2 Landscape Methodology**;<br>• **Application Document 6.6.A3 Environmental Statement Appendix 6.3 Landscape Baseline and Assessment**;<br>• **Application Document 6.7.A2 Environmental Statement Appendix 7.2 Visual Methodology**;<br>• **Application Document 6.7.A4 Environmental Statement Appendix 7.4 Visual Baseline and Assessment**; and<br>• **Application Document 6.7.A5 Environmental Statement Appendix 7.5 Residential Visual Amenity Assessment**.<br>National and local landscape character assessments and studies have been considered in the assessment of potential impacts relevant to the Project, as set out in section 6.4 of **Application Document 6.6 Environmental Statement Chapter 6 Landscape**. |
| 5.10.17 | The landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies based on these assessments in local development documents in England and local development plans in Wales. | |
| 5.10.19 | The applicant should consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established. This will allow the applicant to demonstrate in the ES how negative effects have been minimised and opportunities for creating positive benefits or enhancement have been recognised and incorporated into the design, delivery and operation of the scheme. | Landscape and visual matters were considered in the early stages of siting and design and embedded measures have been intrinsic to the design of the Project to reduce and, where possible, avoid landscape and visual effects. **Application Document 5.9 Design Development Report** provides an overview of the design rationale for the Project. It explains how the Project has sought to avoid or reduce significant environmental effects, including landscape and visual effects, wherever practicable, from the initial option identification and selection stage up to the refinement of the Project in response to feedback, further assessments and design work. The site selection process and consideration of alternatives is also summarised in **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered**, which shows that a wide range of alternatives were considered in the design of the Project, taking into account the EIA process, ground investigations and feedback from consultees received from formal consultation exercises and project meetings.<br>Measures to mitigate landscape and visual impacts are set out in **Application Document 7.3 Register of Environmental Actions and Commitments, Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.8 Outline Landscape and Ecology Management Plan**. As set out in these plans, the Project commits to retaining vegetation where practicable. Woodland, hedgerow and tree, and native shrub planting is proposed at various locations to mitigate loss of vegetation around pylons.<br>As committed to in **Application Document 7.3 Register of Environmental Actions and Commitments** the Project is committed to adopting a sustainable approach to development by proactively exploring measures to ensure that the Project leaves the environment in a better condition than it was before development (including but not limited to delivering 10% Biodiversity Net Gain (BNG) with environmental and societal benefits). The Project will seek to provide strategic habitat enhancement and creation, aiming to identify and implement opportunities to improve habitat quality and connectivity and align with national nature recovery objectives and projects. Such measures may include specific habitat creation and enhancement measures and additional receptor-specific measures such as the creation of habitat piles and installation of bird and bat boxes. |

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| 5.10.20 | The assessment should include the effects on landscape components and character (including key characteristics) during construction and operation. For projects which may affect a National Park, The Broads or a National Landscape the assessment should include effects on the natural beauty and special qualities of these areas. | **Application Document 6.6 Environmental Statement Chapter 6 Landscape** provides an assessment of likely effects on landscape components and character, including key characteristics during construction and operation (including maintenance) of the Project.<br>**Application Document 6.6 Environmental Statement Chapter 6 Landscape** concludes that, following the implementation of the proposed embedded and additional mitigation, there would not be any significant adverse effects on any designated landscapes, which includes the Yorkshire Wolds Important Landscape Area.<br>Although the Yorkshire Wolds Important Landscape Area is not currently designated as a national landscape, on 4 February 2026 Natural England issued notice of intention to 'make' the designation Order for the proposed Yorkshire Wolds AONB (currently Yorkshire Wolds Important Landscape Area). The Draft Yorkshire Wolds AONB (Designation) Order 2026 (Natural England, 2026) identifies the areas to be designated. At its closest, near Market Weighton, the area proposed for designation is approximately 11.4 km from the Limits of Deviation. At this distance, the special qualities and statutory purposes of the AONB would not be significantly affected by the Project and no further assessment has been undertaken.<br>Therefore, there would be no effects on any National Park, The Broads or National Landscape as a result of the Project.<br>During construction, significant adverse landscape effects are predicted for all of the Landscape Character Types (LCTs) and Regional Landscape Character Types (RLCTs) which would be directly affected by construction activity within the Order Limits of the Project. These effects would be limited to areas close to the construction activities, related to the introduction of construction activity and equipment, including the temporary loss of some landscape features including field boundary vegetation. Effects would be temporary and these areas would be reinstated in line with the commitments made in **Application Document 7.3 Register of Environmental Actions and Commitments** which will be secured by **Application Document 3.1 Draft Development Consent Order**.<br>During operation, at Year 1, major adverse (significant) landscape effects are limited to those areas where the proposed overhead line does not run parallel with existing overhead lines, affects a character area which does not already contain existing overhead lines or where vegetation removal which occurred during construction would continue to be noticeable. This includes LCT 12: Sloping Wooded Farmland, LCT 13: Open High Rolling Farmland, Trent Levels: Flat Drained Farmland LCT (in Route Section C) and RLCT 4a: Unwooded Vales.<br>At Operation Year 15, although landscape mitigation would be maturing, significant effects relating to the proposed overhead line would remain. Major adverse (significant) effects would continue for Trent Levels: Flat Drained Farmland LCT (in Route Section C) and RLCT 4a: Unwooded Vales (in Route section E and F). |
| 5.10.21 | The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on dark skies, local amenity and nature conservation. | The assessment in **Application Document 6.6 Environmental Statement Chapter 6 Landscape** includes the visibility and conspicuousness of the Project during construction, and of the presence and operation of the Project.<br>**Application Document 6.7 Environmental Statement Chapter 7 Visual** sets out the assessment of potential impacts on views and visual amenity, which includes consideration of light pollution, dark skies and local amenity and nature conservation. No lighting is proposed during operation of the Project, therefore an assessment of light pollution on dark skies, local amenity and nature conservation is not relevant to the assessment. |
| 5.10.22 | The assessment should also address the landscape and visual effects of light pollution and other emissions (see Section 5.2 and Section 5.7), from construction and operational activities on residential amenity and on sensitive locations, receptors and views, and how these will be minimised. | **Application Document 6.7 Environmental Statement Chapter 7 Visual** addresses the landscape and visual effects of light pollution and other emissions from construction and operational activities on communities including residential amenity, and on sensitive locations, receptors and views, and how these will be minimised. |

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| | | Measures relevant to the control and management of impacts during construction and operation (including maintenance) have been included within **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments** and include best practice construction methods, as well as additional mitigation planting to reduce impacts on communities and views. |
| 5.10.24 | Applicants should consider how landscapes can be enhanced using landscape management plans, as this will help to enhance environmental assets where they contribute to landscape and townscape quality. | **Application Document 7.8 Outline Landscape and Ecology Management Plan**, which will be secured by **Application Document 3.1 Draft Development Consent Order**, has been developed in recognition of the local landscape policies and landscape character, considering the opportunities for local landscape and biodiversity enhancement. It identifies that habitats temporarily affected during construction will be reinstated to their original condition, or an enhanced condition, following completion of works. |
| 5.10.25 | In considering visual effects it may be helpful for applicants to draw attention, in the supporting evidence to their applications, to any examples of existing permitted infrastructure they are aware of with a similar magnitude of impact on equally sensitive receptors. This may assist the Secretary of State in judging the weight they should give to the assessed visual impacts of the proposed development. | As set out in **Application Document 6.7 Environmental Statement Chapter 7 Visual**, much of the area that the Project is located is already influenced by existing overhead line infrastructure. Therefore, most of the proposed overhead line would be seen in the context of the existing overhead lines, thereby containing the spread of infrastructure. As the mitigation planting becomes established, the visual and landscape effects would be further reduced. Major adverse (significant) landscape effects are limited to those areas where the proposed overhead line does not run parallel with existing overhead lines, affects a character area which does not already contain existing overhead lines or where vegetation removal which occurred during construction would continue to be noticeable. |
| 5.10.27 | Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within its development site and wider setting. The careful consideration of colours and materials will support the delivery of a well-designed scheme, as will sympathetic landscaping and management of its immediate surroundings. | As set out in **Application Document 6.6 Environmental Statement Chapter 6 Landscape**, embedded measures that are intrinsic to and built into the design of the Project have been incorporated to reduce and where possible avoid landscape and visual impacts as far as practicable. These include:<br>• Where possible the Project has been designed to be parallel or close parallel with the existing overhead lines to reduce the spread of effects from overhead lines in the landscape. Route Sections where close parallel has been possible, taking into account constraints present along the existing overhead lines as well as technical complexity, include Route Section A which in turn minimises the effects on the Yorkshire Wolds Important Landscape Area, Route Section B between the River Ouse and Luddington, and Route Section D to the south of Beltoft which minimises the effects on the Isle of Axholme Area of Special Historic Landscape Interest.<br>• Where possible and where the Project is not close parallel with the existing overhead lines, the Project has been designed to avoid existing vegetation. Examples include routeing between the larger woodland blocks either side of the M180 in Route Section D and using existing field entrances for access to avoid unnecessary removal of mature hedgerows and trees throughout the length of the Project.<br>These measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments which will be secured by Application Document 3.1 Draft Development Consent Order**. |
| 5.10.28 | Depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site. For example, filling in gaps in existing tree and hedge lines may mitigate the impact when viewed from a more distant vista. | **Application Document 7.8 Outline Landscape and Ecology Management Plan** sets out measures the Project will take in relation to retention, replacement planting and on-site habitat creation. It does not include any off-site landscaping.<br>As set out in **Application Document 7.1 Biodiversity Net Gain Report**, it is anticipated that any off-site landscaping, or BNG, considered to be enhancement, would be delivered through alternative mechanisms outside of the main construction works. |

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| 5.10.29 | The Secretary of State should take into consideration the level of detailed design which the applicant has provided and is secured in the Development Consent Order, and the extent to which design details are subject to future approvals. | To allow for a proportionate degree of flexibility, Limits of Deviation (LoD) have been developed for the Project, which are set out in **Application Document 3.1 Draft Development Consent Order**. The LoDs define the maximum extent within which Project components may be located and provide a clear and controlled framework for detailed design development. The LoDs operate within the Order Limits, which define the maximum extent of the authorised development. Within the horizontal and vertical LoDs, micro-siting has been undertaken to enable the detained positioning of pylons and, where relevant, access routes to avoid or reduce impacts on sensitive features, such as habitats, woodlands and trees. Micro-siting for the Project has considered engineering and safety requirements, and the swing of conductors, ensuring that flexibility is used as a tool to minimise environmental effects while maintaining operational standards.<br>As committed to in **Application Document 7.3 Register of Environmental Actions and Commitments** the Project will seek to retain the pylon positions as shown on **Application Document 2.4 Works Plans** unless following detailed design there are engineering, safety, environmental or other reasons to move a pylon within the Limits of Deviation.<br>The Project has provided details of committed design and mitigation measures during the operation of the Project in the following documents:<br>• **Application Document 7.5 Outline Soil Management Plan**;<br>• **Application Document 7.6 Outline Public Rights of Way Management Plan**;<br>• **Application Document 7.7 Outline Noise and Vibration Management Plan**;<br>• **Application Document 7.8 Outline Landscape and Ecology Management Plan**; and<br>• **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**. |
| 5.10.30 | The Secretary of State should be satisfied that local authorities will have sufficient design content secured to ensure future consenting will meet landscape, visual and good design objectives. | |
| 5.10.32 | When considering applications for development within National Parks, the Broads and National Landscapes the conservation and enhancement of the landscape and scenic beauty should be given great weight by the Secretary of State in deciding on applications for development consent in these areas. The Secretary of State may grant development consent in these areas in exceptional circumstances. Such development should be demonstrated to be in the public interest and consideration of such applications should include an assessment of:<br>• The need for the development, including in terms of national considerations, and the impact of consenting or not consenting it upon the local economy;<br>• The cost of, and scope for, developing all or part of the development elsewhere outside the designated area or meeting the need for it in some other way, taking account of the policy on alternatives set out in Section 4.3; and<br>• Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. | **Application Document 6.6 Environmental Statement Chapter 6 Landscape** concludes that there would not be any significant adverse effects on any designated landscapes, which includes the Yorkshire Wolds Important Landscape Area.<br>Although the Yorkshire Wolds Important Landscape Area is not currently designated as a national landscape, on 4 February 2026 Natural England issued notice of intention to 'make' the designation Order for the proposed Yorkshire Wolds AONB (currently Yorkshire Wolds Important Landscape Area). The Draft Yorkshire Wolds AONB (Designation) Order 2026 (Natural England, 2026) identifies the areas to be designated. At its closest, near Market Weighton, the area proposed for designation is approximately 11.4 km from the Limits of Deviation. At this distance, the special qualities and statutory purposes of the AONB would not be significantly affected by the Project and no further assessment has been undertaken.<br>Therefore, there would be no effects on any National Park, The Broads or National Landscape as a result of the Project. |
| 5.10.33 | For development proposals located within designated landscapes the Secretary of State should be satisfied that measures which seek to further purposes of the designation are appropriate, reasonable and proportionate to the type and scale of the development. The Secretary of State should ensure that any projects consented in these designated areas should be carried out to high environmental standards, including through the application of appropriate requirements where necessary. | |
| 5.10.34 | The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas, which may have impacts within them. The aim should be to avoid harming the purposes of designation or to minimise adverse effects on the designation. Such projects should be designed sensitively given the various siting, operational, and other relevant constraints. | |

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| | The fact that a proposed project will be visible from within a designated area should not in itself be a reason for the Secretary of State to refuse consent. | |
| 5.10.35 | The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project. | **Application Document 6.6 Environmental Statement Chapter 6 Landscape** sets out the residual effects on the landscape following the implementation of embedded and additional mitigation measures set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, and **Application Document 7.8 Outline Landscape and Ecology Management Plan**, which will be secured by **Application Document 3.1 Draft Development Consent Order**. It states that the presence of construction activities would result in significant effects to LCT 12: Sloping Wooded Farmland, LCT 13: Open High Rolling Farmland, and Trent Levels: Flat Drained Farmland LCT, LCT 4: River Corridors, LCT 9: Drained Open Farmland, LCT 11: Jurassic Hills Farmland, LCT 16: Sloping Farmland, LCT 23: Humber Banks, Trent Levels: Flat Wooded Farmland LCT, Trent Levels: Open Island Farmland LCT, RLCT 2b: Planned and Drained Fens and Carrlands and RLCT 4a: Unwooded Vales. These effects relate to the presence of construction activities, therefore when construction is complete, most of these effects will cease. Following construction, and the implementation of mitigation measures, significant adverse landscape effects during operation (Year 1 and 15) are limited to those areas where the proposed overhead line does not run parallel with existing overhead lines, affects a character area which does not already contain existing overhead lines or where vegetation removal which occurred during construction would continue to be noticeable. This includes LCT 12: Sloping Wooded Farmland, LCT 13: Open High Rolling Farmland, Trent Levels: Flat Drained Farmland LCT (in Route Section C) and RLCT 4a: Unwooded Vales (in Route section E and F).<br>As set out in **Application Document 6.6 Environmental Statement Chapter 6 Landscape**, embedded measures that are intrinsic to and built into the design of the Project have been incorporated to reduce and where possible avoid landscape and visual impacts as far as practicable. Whilst the Project will result in some significant adverse impacts during construction and operation, proposed landscape mitigation which is set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan**, which will be secured by **Application Document 3.1 Draft Development Consent Order** has responded to the design of the Project throughout its development as set out in **Application Document 5.10 Design Approach Document**.<br>Overall, the substantial public benefits and need for the Project, as set out in section 3 of **Application Document 5.5 Planning Statement**, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives and carbon reduction commitments, clearly and demonstrably, in the Applicant's view, outweigh the limited and localised adverse impacts to the landscape set out in **Application Document 6.6 Environmental Statement Chapter 6 Landscape**. |
| 5.10.36 | In reaching a judgement, the Secretary of State should consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the Secretary of State considers reasonable. | As set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan,** habitats temporarily affected during construction will be reinstated to their original condition, or an enhanced condition, following completion of works. The presence of construction activities would result in significant effects to LCT 12: Sloping Wooded Farmland, LCT 13: Open High Rolling Farmland, and Trent Levels: Flat Drained Farmland LCT, LCT 4: River Corridors, LCT 9: Drained Open Farmland, LCT 11: Jurassic Hills Farmland, LCT 16: Sloping Farmland, LCT 23: Humber Banks, Trent Levels: Flat Wooded Farmland LCT, Trent Levels: Open Island Farmland LCT, RLCT 2b: Planned and Drained Fens and Carrlands and RLCT 4a: Unwooded Vales. These effects relate to the presence of construction activities, therefore when construction is complete, most of these effects will cease. Following construction, and the implementation of mitigation measures, significant adverse landscape effects during operation (Year 1 and 15) are limited to those areas where the proposed overhead line does not run parallel with existing overhead lines, affects a character area which does not already contain existing overhead lines or where vegetation removal which occurred during construction would continue to be noticeable. This includes LCT 12: Sloping Wooded |

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| | | Farmland, LCT 13: Open High Rolling Farmland, Trent Levels: Flat Drained Farmland LCT (in Route Section C) and RLCT 4a: Unwooded Vales.<br>Full details of the landscape strategy are provided in **Application Document 7.8 Outline Landscape and Ecology Management Plan**, which will be secured by **Application Document 3.1 Draft Development Consent Order**. |
| 5.10.37 | The Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation. | As set out in **Application Document 6.6 Environmental Statement Chapter 6 Landscape**, **Application Document 6.7 Environmental Statement Chapter 7 Visual**, **Application Document 5.10 Design Approach Document**, and **Application Document 7.8 Outline Landscape and Ecology Management Plan**, embedded measures that are intrinsic to and built into the design of the Project have been incorporated to reduce and where possible avoid landscape and visual impacts as far as practicable. Additional mitigation measures are also proposed to further minimise harm to the landscape as set out in these documents. |
| 5.10.38 | The Secretary of State should consider whether requirements to the consent are needed requiring the incorporation of particular design details that are in keeping with the statutory and technical requirements for landscape and visual impacts. | |
| **5.11 Land Use, Including Open Space, Green Infrastructure and Green Belt** | | |
| 5.11.8 | The ES (see Section 4.3) should identify existing and proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan. The assessment should be proportionate to the scale of the preferred scheme and its likely impacts on such receptors. For developments on previously developed land, the applicant should ensure that they have considered the risk posed by land contamination and how it is proposed to address this. | In accordance with paragraph 5.11.8 of NPS EN-1, **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** identifies existing land uses near the Project, **Application Document 6.21 Environmental Statement Chapter 21 Inter-project Cumulative Effects** identifies proposed land uses near the Project. The effects of replacing an existing or proposed land use with the Project, or preventing a development or use on a neighbouring site from continuing, are set out in the respective chapters.<br>The Project has been designed from the outset to avoid, where possible, and reduce environmental impacts and impacts on land uses by following the mitigation hierarchy and embedded, control and management and additional mitigation measures have been incorporated into the design of the Project to minimise and avoid, where possible, socio-economic effects. These are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, **Application Document 7.4 Outline Construction Traffic Management Plan**, **Application Document 7.6 Outline Public Rights of Way Management Plan** and **Application Document 7.2 Outline Code of Construction Practice**, all of which will be secured by **Application Document 3.1 Draft Development Consent Order**.<br>Although the construction of the Project would result in significant effects due to the permanent cessation of operations at Forwood Farm Airfield, elements of operations at Headon Airfield and at Darlton Gliding Club can continue. The affected airfields are currently only used for recreational activities and not for military or defence operations.<br>The assessment concludes that no recreational land facilities, including open space, are anticipated to experience any significant severance effects during construction and operation (including maintenance) of the Project. In addition, taking into account the residual effect assessment results of the visual, traffic and transport, air quality, and noise and vibration assessments relating to the construction activities, there are no sections of recreational or open space that would experience a significant effect on their amenity.<br>The Project has sought to avoid or minimise adverse effects on green infrastructure, and maximise benefits through design, and a scheme of mitigation planting across the Project's Order Limits is proposed as set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan**, to extend existing habitats, for example woodland areas, and provide links between existing areas of habitats.<br>Following completion of construction activities, and during the operation and maintenance of the Project, **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** concludes that there would be no significant adverse effects on any PRoWs. |

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| | | The Project would not result in the prevention of a development or use on a neighbouring site from continuing, as set out in **Application Document 5.11 Interrelationship Document**. As set out in **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** none of the identified developments or planning applications are expected to experience land-take as a result of the construction of the Project, and no extant planning applications or allocations that are expected to be operational before the commencement of construction of the Project are anticipated to experience any significant severance effects during construction of the Project. Therefore, the Project does not preclude any new development or proposed use (e.g. allocated sites) in any of the relevant development plans.<br>**Application Document 6.12 Environmental Statement Chapter 12 Geology and Hydrogeology** sets out the potential effects of the Project on geological and hydrogeological receptors including contaminated land. A contamination preliminary risk assessment has also been undertaken and presented in **Application Document 6.12.A2 Environmental Statement Appendix 12.2 Preliminary Contamination Risk Assessment**. The Preliminary Contamination Risk Assessment has identified a very low/low risk of existing contamination being present within the Order Limits, therefore it is concluded that the Project is located on a site that is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination. |
| 5.11.9 | Applicants will need to consult the local community on their proposals to build on existing open space, sports or recreational buildings and land. Taking account of the consultations, applicants should consider providing new or additional open space including green and blue infrastructure, sport or recreation facilities, to substitute for any losses as a result of their proposal. When considering proposals for green infrastructure, applicants should refer to the Green Infrastructure Framework. | **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** provides an assessment of the Project in relation to open space, sport or recreational buildings and land.<br>The assessment concludes that no recreational land facilities, including open space, are anticipated to experience any significant severance effects during construction and operation (including maintenance) of the Project. In addition, taking into account the residual effect assessment results of the visual, traffic and transport, air quality, and noise and vibration assessments relating to the construction activities, there are no sections of recreational or open space that would experience a significant effect on their amenity.<br>The Project has sought to avoid or minimise adverse effects on green infrastructure, and maximise benefits through design, and a scheme of mitigation planting across the Project's Order Limits is proposed as set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan**, to extend existing habitats, for example woodland areas, and provide links between existing areas of habitats. |
| 5.11.12 | Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5). | **Application Document 7.17 Strategic Options Report Including Needs Case**, **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** and **Application Document 7.19 Supplementary Corridor and Routeing Report**, **Application Document 7.20 Design Development Report - 2025** and **Application Document 5.9 Design Development Report** show how National Grid has considered Best and Most Versatile (BMV) land in the site selection and options appraisal process, resulting in the selection of land that minimises BMV land as far as practicable while also taking into account and balancing other environmental impacts, operational requirements and costs to enable the delivery of a feasible Project.<br>Temporary significant adverse effects are anticipated on BMV land and soils during the construction of the Project. There would be a temporary loss of 1,050.39 ha BMV land from agricultural production during construction, and effects to the ecosystem services that soils provide over an area of up to approximately 1617.20 ha. Effective mitigation measures are set out within **Application Document 7.3 Register of Environmental Actions and Commitments and Application Document 7.5 Outline Soil Management Plan** for soil handling, storage and reinstatement which would reduce effects on soils. All land required (including areas where soils have been disturbed) temporarily would be reinstated by the end of the construction phase.<br>Following the amendments made to the design to consider agricultural land, and following the implementation of embedded, control and management measures, **Application Document 6.13** |
| 5.11.13 | Applicants should also identify any effects and seek to minimise impacts on soil health and protect and improve soil quality taking into account any mitigation measures proposed. | |

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| | | **Environmental Statement Chapter 13 Agriculture and Soils** concludes that there would be a permanent removal of 34.4 ha of BMV land as a result of the operation and maintenance of the Project. Although some of this includes land for the new-build pylon footings across the route, much of the land is required for environmental and ecological mitigation, and areas for veteran tree compensation, mitigation planting, BNG mitigation and flood compensation. While those areas used for mitigation purposes are no longer in agricultural use during the operation of the Project, there may be potential benefits as a result of such changes in terms of soil health and soil function.<br>In addition, as set out in **Application Document 6.13 Environmental Statement Chapter 13 Agriculture and Soils** the areas of BMV agricultural land permanently required by the Project only account for 2.27% of all agricultural land within the Order Limits. Therefore, overall it is considered that, while the Project has not been able to avoid the use of BMV agricultural land completely, it is a small percentage of the overall area of agricultural land, and the urgent need for reinforcement of the transmission system to accommodate contracted and predicted generation connections in the area outweighs the use of BMV agricultural land. |
| 5.11.14 | Applicants are encouraged to develop and implement a Soil Management Plan which could help minimise potential land contamination. The sustainable reuse of soils needs to be carefully considered in line with good practice guidance where large quantities of soils are surplus to requirements or are affected by contamination. | **Application Document 7.5 Outline Soil Management Plan** has been prepared and submitted and includes good practice measures that are proposed for the Project in relation to land contamination and reuse of soils. A detailed soil management plan, which will be substantially in accordance with **Application Document 7.5 Outline Soil Management Plan**, will be prepared in accordance with a requirement in **Application Document 3.1 Draft Development Consent Order**. |
| 5.11.15 | Developments should contribute to and enhance the natural and local environment by preventing new and existing developments from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. | As set out in **Application Document 7.3 Register of Environmental Actions and Commitments** embedded measures have been intrinsic to the design of the Project to avoid and reduce significant adverse effects. The Project has been designed with sensitive routeing and siting of infrastructure and temporary works to avoid potentially contaminative sites such as landfills, and sensitive features (such as Source Protection Zone 1s) where practicable. Control and management measures are also proposed and set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments** which will be secured by **Application Document 3.1 Draft Development Consent Order**. **Application Document 6.12.A2 Environmental Statement Appendix 12.2 Preliminary Contamination Risk Assessment** has identified a very low/low risk of existing contamination being present within the Order Limits, therefore it is concluded that the Project is located on a site that is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination. |
| 5.11.17 | Applicants should ensure that a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination. | **Application Document 6.12 Environmental Statement Chapter 12 Geology and Hydrogeology** sets out the potential effects of the Project on geological and hydrogeological receptors including contaminated land. A contamination preliminary risk assessment has also been undertaken and presented in **Application Document 6.12.A2 Environmental Statement Appendix 12.2 Preliminary Contamination Risk Assessment**. The Preliminary Contamination Risk Assessment has identified a very low/low risk of existing contamination being present within the Order Limits, therefore it is concluded that the Project is located on a site that is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination. |
| 5.11.18 | For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination, and where contamination is present, applicants should consider opportunities for remediation where possible. It is important to do this as early as possible as part of engagement with the relevant bodies before the official pre-application stage. | **Application Document 6.12 Environmental Statement Chapter 12 Geology and Hydrogeology** and **Application Document 6.12.A2 Environmental Statement Appendix 12.2 Preliminary Contamination Risk Assessment** concludes that the majority of the Order Limits is indicated to have remained as undeveloped/agricultural land since the earliest reviewed historical mapping. Therefore, in these areas it is considered that there is a very low risk of a significant source of potential contamination. There are discrete areas within the 250 m study area for the Project where either the historical land use or the current land use have been identified as potentially contaminative. |

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| | | However, following the implementation of embedded and control and management measures proposed in **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.2 Outline Code of Construction Practice**, the Preliminary Risk Assessment concludes that there is a low risk of exposure to any existing contamination through ground disturbance. Therefore, it is considered that the temporary construction impacts from exposure to existing contamination for human health receptors, and groundwater and groundwater receptors would result in an overall negligible effect, which would be not significant. As committed to in **Application Document 7.3 Register of Environmental Actions and Commitments** the Preliminary Risk Assessment will be reviewed once the detailed design of the Project is available to ensure that the assumptions made within the risk assessment are still valid (i.e. that the Project does not disturb any of the sites identified within the Preliminary Risk Assessment). |
| 5.11.19 | Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place. | The Project does not include decommissioning. Any decommissioning would need to be undertaken via a separate application and ES.<br>The location and design of the Project is the result of a comprehensive site selection process that was led by the consideration of good design and key environmental and planning constraints to avoid and minimise impacts as early as possible. The site selection and design process is documented in detail in **Application Document 7.17 Strategic Options Report including Needs Case**, **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study**, **Application Document 7.19 Supplementary Corridor and Routeing Report**, **Application Document 7.20 Design Development Report - 2025**, **Application Document 5.9 Design Development Report** and **Application Document 5.10 Design Approach Document**. The use of design principles has guided the development of the Project. These principles reflect the acknowledgement in the NPSs that good design for electricity transmission infrastructure is achieved through infrastructure that is safe, secure and resilient, and which responds appropriately to its environmental and community context, and is not defined solely by visual appearance. The principles considered include the Holford guidance, undergrounding policy, local planning policy, NIC Design Principles (National Infrastructure Commission, 2020), Planning Inspectorate's Advice on Good Design (Planning Inspectorate, 2024) and on Linear Projects (Planning Inspectorate, 2025), technical design requirements set out in legislation and policy and other relevant legislation and policies.<br>**Application Document 7.5 Outline Soil Management Plan** has been prepared and submitted and includes good practice measures that are proposed for the Project in relation to land contamination and reuse of soils. A detailed soil management plan which will be substantially in accordance with **Application Document 7.5 Outline Soil Management Plan** will be prepared in accordance with a requirement in **Application Document 3.1 Draft Development Consent Order**.<br>Whist it is acknowledged that some temporary sterilisation of some small areas of minerals resources may occur associated with the Project, these resources could become available in the future. **Application Document 6.12.A3 Environmental Statement Appendix 12.3 Preliminary Qualitative Mineral Resource Assessment** concludes that it would not be practical to extract the mineral prior to development.<br>The Project is considered to be of national significance, and therefore the need for the Project outweighs the need to safeguard the mineral deposit. Based on the national significance of the Project and that all affected authorities have more than the seven-year land bank of sand and gravel, as required by the NPPF, and sufficient additional safeguarded areas, it is considered that the potential impact of sterilising the small volume associated with the Project is acceptable without further consideration or mitigation. |
| 5.11.23 | Although in the case of most energy infrastructure there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site (assuming that some of that use can still be retained post project construction) applicants should nevertheless seek to minimise these effects and the effects on existing or planned uses near the site by the application of good design principles, including the layout of the project and the protection of soils during construction. | |

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| 5.11.24 | Where green infrastructure is affected, the Secretary of State should consider imposing requirements to ensure the functionality and connectivity of the green infrastructure network is maintained in the vicinity of the development and that any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space including appropriate access to National Trails and other public rights of way and new coastal access routes. | The Project has sought to avoid or minimise adverse effects on existing and proposed land use and green infrastructure including open space, and maximise benefits through design, through embedded measures like sensitive routeing and siting of infrastructure and temporary works, and a number of ecological and landscaping measures set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan**. This includes mitigation planting areas across the Project Order Limits chosen with a view to extend existing habitats, for example woodland areas, and/or provide links between existing areas of habitat.<br>In addition to the above, the Project commits to control and management measures during construction to minimise potential impacts, as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, **Application Document 7.4 Outline Construction Traffic Management Plan**, **Application Document 7.6 Outline Public Rights of Way Management Plan** and **Application Document 7.2 Outline Code of Construction Practice**. These include (but are not limited to):<br>• Maintaining access to community facilities, businesses, tourism assets and recreational areas where practicable when they fall within the Order Limits. Where closures are unavoidable, appropriate temporary access arrangements will be provided, including diversions with advance notice signage, ensuring that affected users are clearly informed of changes before and throughout the construction period.<br>• Avoiding the closure of The Yorkshire Wolds Way for users for the duration of construction works associated with the Project, including implementing a suitable and proportionate crossing provision following agreement with the local planning authority PRoW officer.<br>• Managing PRoW diversions and temporary closures in discussion with the relevant local authority. Access disruption will be minimised, where practicable and safe, while construction activities occur. Any required temporary diversions will be clearly marked at both ends with signage explaining the diversion, the duration of the diversion and a contact number for any concerns.<br>**Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** anticipates that, following the implementation of embedded and control measures, there would be no permanent PRoW closures or diversions as a result of the Project and no significant adverse effects on PRoW.<br>The assessment concludes that no recreational land facilities are anticipated to experience any significant severance effects during construction and operation (including maintenance) of the Project. In addition, taking into account the residual effect assessment results of the visual, traffic and transport, air quality, and noise and vibration assessments relating to the construction activities, there are no sections of recreational or open space that would experience a significant effect on their amenity. |
| 5.11.25 | The Secretary of State should also consider whether any adverse effect on green infrastructure and other forms of open space is adequately mitigated or compensated by means of any planning obligations, for example exchange land and provide for appropriate management and maintenance agreements. Any exchange land should be at least as good in terms of size, usefulness, attractiveness and quality, and accessibility. | |
| 5.11.27 | Existing trees and woodlands should be retained wherever possible. Under the Environment Act 2021 the government set a legally binding target to increase the tree canopy and woodland cover to 16.5% of total land area of England by 2050.<br>The Environmental Improvement Plan recognises the need to protect and increase tree canopy and woodland covers. The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include but is not limited to, the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long-term management and maintenance of newly planted trees should be secured. Where possible, projects should include the reuse of materials and use of sustainable materials such as timber, or recycled materials. | Existing trees and woodland, including irreplaceable habitats including ancient woodland and trees, and veteran trees, have been a key consideration since the early stages of siting and design of the Project. **Application Document 7.17 Strategic Options Report Including Needs Case**, **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study**, **Application Document 7.19 Supplementary Corridor and Routeing Report**, and **Application Document 5.9 Design Development Report** provide an overview of the design rationale for the Project. They explain how the Project has sought to avoid or reduce significant environmental effects from the initial option identification and site selection stage to the refinement of the Project, including siting, in response to feedback, further assessments and design work.<br>**Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** sets out the iterative appraisal and optioneering process undertaken in accordance with the Holford Guidance. It explains that a core environmental objective from the outset was the avoidance of irreplaceable habitats, including ancient woodland. It states at section 5.6 that at the strategic corridor definition |

stage, ancient woodland was established as a high-sensitivity constraint. The document confirms that the vast majority of ancient woodland parcels within the wider study area were avoided altogether, with smaller parcels only encompassed within corridor boundaries where sufficient width and flexibility existed to secure total avoidance during subsequent routeing and detailed design stages. Section 12.3 of **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** describes the following specific design alternatives considered which sought to directly avoid or minimise impacts on ancient and mature woodland

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

- Micro-siting of pylons to take into account swing of the proposed overhead lines to minimise the instance where woodland would need to be cleared to avoid the overhead line swing, to avoid or minimise loss of woodland and trees as far as practicable.
- Designated ancient woodlands will be protected throughout the works with a minimum exclusion zone of 15 m offset from the edge of the designated ancient woodland. For any necessary works within the RPAs, an Arboricultural Clerk of Works (ArbCoW) will be consulted to agree the working method, including for example, where breaking ground is required and to remove compaction risks.
- All known veteran trees within, and which have canopy overhanging, the Order Limits will be retained with the exception of T4 Common Oak - *Quercus robur* which cannot be retained if the flexibility afforded by the Limits of Deviation were to be used. The locations of veteran trees are shown within Appendix D of **Application Document 7.14 Arboricultural Impact Assessment**.
- National Grid has committed to a 3:1 replacement for individual trees and individual trees within small groups. The Project will prioritise (where possible and practicable) the replanting for individual trees and small groups of individual trees within the Order Limits.

Specific measures during construction to minimise impacts to existing trees and woodland including irreplaceable habitats such as adherence to good site practices and ensuring legal compliance, protective measures, crown management and pruning requirements are set out in **Application Document 7.3 Register of Environmental Actions and Commitments, Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.2 Outline Code of Construction Practice**.

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

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

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

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

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

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

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

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

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

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

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

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| | | it is considered that the overriding public need and benefit of the Project (as set out in sections 3 and 7.5 of CS5<br>**Application Document 5.5 Planning Statement**) would clearly outweigh the loss or deterioration of the habitat, and it would therefore be wholly exceptional. In addition, a relevant compensation strategy is provided within the Order Limits for potential impacts as far as possible and is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**. |
| 5.11.28 | Where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), the Secretary of State should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources. | Whist it is acknowledged that some temporary sterilisation of some small areas of minerals resources may occur associated with the Project, these resources could become available in the future. **Application Document 6.12.A3 Environmental Statement Appendix 12.3 Preliminary Qualitative Mineral Resource Assessment** concludes that it would not be practical to extract the mineral prior to development. Even if the full extent of the Order Limits within an MSA were to sterilise mineral of sufficient quality and extent to be economically valuable, the extent of the sterilised area is very small in comparison to the extent of the MSA. Therefore, in the context that only a relatively small proportion of the overall Order Limits will sterilise potential mineral resource, the quantity of mineral that could be sterilised by the Project is considered to be insignificant in the context of the extensive occurrence of the minerals (predominantly sand and gravel) within the counties and the national need/significance of the Project as set out in **Application Document 7.17 Strategic Options Report Including Needs Case**.<br>It should be noted that land required for the Project is also required for environmental/ecological mitigation (including areas for veteran tree compensation, mitigation planting, Biodiversity Net Gain (BNG) mitigation and flood compensation). Where land use would be changed to enable environmental mitigation, the soils would not be removed, and there may be potential benefits as a result of such changes in terms of soil health and soil function. Effective mitigation measures are set out within **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.5 Outline Soil Management Plan** for soil handling, storage and reinstatement which would reduce effects on soils as far as practicable.<br>The Project is considered to be of national significance, and therefore the need for the Project outweighs the need to safeguard the mineral deposit. Based on the national significance of the Project and that all affected authorities have more than the seven-year land bank of sand and gravel, as required by the NPPF, and sufficient additional safeguarded areas, it is considered that the potential impact of sterilising the small volume associated with the Project is acceptable without further consideration or mitigation. |
| 5.11.29 | Where a project has a sterilising effect on land use (for example in some cases under transmission lines) there may be scope for this to be mitigated through, for example, using or incorporating the land for nature conservation or wildlife corridors or for parking and storage in employment areas | |
| 5.11.30 | Public Rights of way, National Trails, and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve or create new access. In considering revisions to an existing right of way, consideration should be given to the use, character, attractiveness, and convenience of the right of way. | As set out in **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** there would be no permanent adverse impacts on any PRoW during construction, operation and maintenance of the Project. Closures and diversions will be carried out in accordance with **Application Document 7.6 Outline Public Rights of Way Management Plan**, which will be secured by **Application Document 3.1 Draft Development Consent Order**. No significant effects are anticipated during the operation of the Project.<br>The assessment in **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** concludes that no recreational land facilities are anticipated to experience any significant severance effects during construction and operation (including maintenance) of the Project. In addition, taking into account the residual effect assessment results of the visual, traffic and transport, air quality, and noise and vibration assessments relating to the construction activities, there are no sections of recreational or open space that would experience a significant effect on their amenity. |

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| 5.11.31 | The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements or other provisions in respect of these measures should be included in any grant of development consent. | National Grid has committed to a number of embedded, control and management and additional measures as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, which will be secured by **Application Document 3.1 Draft Development Consent Order**. |
| **5.12 Noise and Vibration** | | |
| 5.12.6 | Where noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment:<br>• A description of the noise generating aspects of the development proposal leading to noise impacts, including the identification of any distinctive tonal characteristics, if the noise is impulsive, whether the noise contains particular high or low frequency content or any temporal characteristics of the noise;<br>• Identification of noise sensitive receptors and noise sensitive areas that may be affected;<br>• The characteristics of the existing noise environment;<br>• A prediction of how the noise environment will change with the proposed development;<br>– In the shorter term, such as during the construction period;<br>– In the longer term, during the operating life of the infrastructure; and<br>– At particular times of the day, evening and night (and weekends) as appropriate, and at different times of year.<br>• an assessment of the effect of predicted changes in the noise environment on any noise-sensitive receptors, including an assessment of any likely impact on health and quality of life / wellbeing where appropriate, particularly among those disadvantaged by other factors who are often disproportionately affected by noise-sensitive areas;<br>• If likely to cause disturbance, an assessment of the effect of underwater or subterranean noise; and<br>• All reasonable steps taken to mitigate and minimise potential adverse effects on health and quality of life. | An assessment of the potential noise impacts of the Project is set out in **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** and concludes there will be no significant effects as a result of the construction and operation of the Project. The assessment sets out a description of the noise generating aspects of the Project including the characteristics of such noise. For construction a number of activities are anticipated to generate noise including:<br>• Preparation and establishment of temporary access/egress to the works areas, and construction access tracks, highway works, and bellmouths;<br>• Establishment and operation of construction compounds and laydown areas;<br>• Ancillary works, such as drainage and vegetation clearance;<br>• Construction of pylon foundations and erection of pylons;<br>• Stringing of the proposed overhead line;<br>• Third party works; and<br>• Removal of temporary construction works and site reinstatement.<br>Potential noise generating activities during operation include two locations where triple Araucaria conductors are not proposed or cannot be committed to at this stage due to potential operational constraints:<br>• The River Ouse between proposed pylons 4AF76 and 4AF80; and<br>• The realignment of the existing ZDA route between Ealand and west of Keadby (between existing pylons ZDA116 and ZDA123).<br>The identification of noise sensitive receptors and the characteristics of the existing noise environment are set out in section 16.6 of **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** and **Application Document 6.16.F1 Environmental Statement Figure 16.1 Noise and Vibration Baseline**. Ecological and heritage receptors that may be affected by noise and vibration are considered within **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** and **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage**, respectively.<br>The assessment undertaken in **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** includes an assessment of how the noise environment will change in the short term (construction) and during the operating life of the infrastructure (operation). The assessment also takes into account different times of the day and weather conditions. For operational noise during dry conditions at the nearest Noise Sensitive Receptors (NSRs) during daytime and night-time periods is negligible to low. For wet conditions the change in ambient level is approximately 1 dB during daytime and night-time periods, which, even considering the worst-case potential conductor type, does not result in a significant effect.<br>An assessment of the effects of predicted changes in the noise environment is set out in section 16.9 of **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration**. The assessment concludes that following the implementation of mitigation and control measures, no significant effects are anticipated on NSRs during construction or operation (including maintenance) |
| 5.12.7 | The nature and extent of the noise assessment should be proportionate to the likely noise impact. | |

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| | | of the Project. While potential adverse effects are anticipated at seven residential NSRs due to activities including pylon construction, construction access tracks/highways construction and potential underground cabling, these are considered to be acceptable following the implementation of Best Practice Measures and no significant effects are anticipated.<br>The Project has been designed following the mitigation hierarchy as far as practicable with the route alignment being sited and designed to avoid NSRs including settlements and residential areas, passing predominantly through rural areas, with the majority of nearby NSRs comprising isolated dwellings and small settlements. The Project is not likely to cause disturbance in terms of underwater or subterranean noise.<br>Measures relevant to the control and management of impacts during construction of the Project are included in **Application Document 7.2 Outline Code of Construction Practice**, **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.7 Outline Noise and Vibration Management Plan**. Detailed plans which must be substantially in accordance with these outline management plans will be brought forward post consent as secured by **Application Document 3.1 Draft Development Consent Order**. |
| 5.12.8 | Applicants should consider the noise impact of ancillary activities associated with the development, such as increased road and rail traffic movements, or other forms of transportation. | The Project has been designed following the mitigation hierarchy as far as practicable with the route alignment being sited and designed to avoid NSRs including settlements and residential areas. An assessment of construction traffic noise is provided in **Application Document 6.16.A4 Environmental Statement Appendix 16.4 Construction Traffic Noise and Vibration Assessment**. The assessment has considered construction traffic on the public highway and on construction access tracks. The assessment of construction traffic on construction access tracks concludes that construction traffic noise would be below the SOAEL at all nearby NSRs for all construction access tracks. As such, significant adverse effects from noise from construction traffic on the construction access tracks are not expected. The assessment of construction traffic noise on the public highway also concludes that no significant effects are anticipated as a result of the construction of the Project. |
| 5.12.9 | Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. Further information on assessment of particular noise sources may be contained in the technology specific NPSs. In particular, for renewables (EN-3) and electricity networks (EN-5) there is assessment guidance for specific features of those technologies. For the prediction, assessment and management of construction noise, reference should be made to any relevant British Standards and other guidance which also give examples of mitigation strategies. | As set out in section 16.4 of **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** the assessment of noise, including operational noise, has been undertaken using the principles of relevant British Standards. A response to the assessment guidance for the Project in NPS EN-5 has been carried out in table 1.2 below. |
| 5.12.10 | Some noise impacts will be controlled through environmental permits and parallel tracking is encouraged where noise impacts determined by an environmental permit interface with planning issues (i.e. physical design and location of development). The applicant should consult the EA and / or the SNCB, and other relevant bodies, such the MMO or NRW, as necessary, and in particular regarding assessment of noise on protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potentially affected species in nearby sites may also need to be considered. | **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** provides an assessment of the likely significant noise and vibration effects that could result from the construction and operation (including maintenance) of the Project.<br>As set out in section 16.3 of **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration**, the Applicant has consulted with the EA regarding the assessment of noise.<br>**Application Document 6.8 Environmental Statement Chapter 8 Ecology** presents an assessment of potential impacts on ecological receptors including protected species, taking into account noise impacts. No significant adverse effects are reported on any species a a result of the Project.<br>The Project has been designed following the mitigation hierarchy as far as practicable with the route alignment being sited and designed to avoid NSRs including settlements and residential areas and ecological receptors and species, passing predominantly through rural areas, with the majority of nearby NSRs comprising isolated dwellings and small settlements. With the implementation of design and control measures, potential significant adverse effects for NSRs during the construction |

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| | | and operation (including maintenance) of the Project can be minimised and avoided and therefore no significant effects are anticipated. |
| 5.12.11 | In the marine environment, applicants should consider noise impacts on protected species, as well as other noise sensitive receptors, both at the individual project level and in-combination with other marine activities. | **Application Document 6.8 Environmental Statement Chapter 8 Ecology** presents an assessment of potential impacts on protected species in the marine environment, taking into account noise impacts. No significant adverse effects are reported on species in the marine environment, including fish.<br>Due to the distance between proposed pylon locations and the banks of the River Ouse (approximately 90 m), vibration levels are not expected to generate noise levels which may disturb fish. A precautionary approach has been taken. As such, commitment NV25 of **Application Document 7.3 Register of Environmental Actions and Commitments** ensures that measures are put in place such that underwater noise due to construction vibration does not affect fish.<br>**Application Document 6.21Environmental Statement Chapter 21 Inter-Project Cumulative Effects** provides an assessment of the cumulative effects of the Project and other developments in relation to ecology, taking into account the marine environment. No significant residual cumulative impacts are expected on the marine environment. |
| 5.12.12 | Applicants should submit a detailed impact assessment and mitigation plan as part of any development plan, including the use of noise mitigation and noise abatement technologies during construction and operation. | A detailed noise impact assessment is provided in **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** which concludes no significant effects are anticipated as a result of the Project. It is supported by<br>• **6.16.A1 Appendix 16.2 Baseline Noise Survey Data**<br>• **6.16.A3 Appendix 6.13 Construction Noise and Vibration Data**<br>• **6.16.4A Construction Traffic Noise and vibration Assessment**<br>• **6.16.A5 Appendix 16.5 Operational Overhead Line Noise Assessment**<br>Measures relevant to the mitigation of impacts and noise abatement technologies during construction and operation (including maintenance) of the Project are included in **Application Document 7.2 Outline Code of Construction Practice**, **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.7 Outline Noise and Vibration Management Plan**. Detailed plans which must be substantially in accordance with these outline management plans will be brought forward post consent as secured by **Application Document 3.1 Draft Development Consent Order**. |
| 5.12.13 | The Secretary of State should consider whether mitigation measures are needed both for operational and construction noise over and above any which may form part of the project application. In doing so the Secretary of State may wish to impose mitigation measures. Any such mitigation measures should take account of the NPPF or any successor to it and the Planning Practice Guidance on Noise. | **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** presents an assessment of the likely significant effects of the Project on noise and vibration.<br>The Project has been designed following the mitigation hierarchy as far as practicable with the route alignment being sited and designed to avoid NSRs including, ecological receptors and sites, settlements and residential areas, passing predominantly through rural areas, with the majority of nearby NSRs comprising isolated dwellings and small settlements. With the implementation of design and control measures, potential significant adverse effects for NSRs during the construction and operation (including maintenance) of the Project can be minimised and avoided and therefore no significant effects are anticipated.<br>**Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments** contain a list of relevant standard mitigation measures and BPM relating to noise and vibration. Mitigation measures relating to construction are set out as commitment references NV01 to NV26.<br>As set out in **Application Document 7.7 Outline Noise and Vibration Management Plan (NVMP)** and committed to in **Application Document 7.3 Register of Environmental Actions and Commitments**, the Main Works Contractor(s) will conduct further detailed construction noise and vibration assessments based on their specific construction methodologies. The Main Works |
| 5.12.14 | Mitigation measures may include one or more of the following:<br>• Engineering: reducing the noise generated at source and/or containing the noise generated;<br>• Lay-out: where possible, optimising the distance between the source and noise-sensitive receptors and/or incorporating good design to minimise noise transmission through the use of screening by natural or purpose-built barriers, or other buildings;<br>• Administrative: using planning conditions/obligations to restrict activities allowed on the site at certain times and/or specifying permissible noise limits/noise levels, differentiating as appropriate between different times of day, such as evenings and late at night, and taking into account seasonality of wildlife in nearby designated sites; and<br>• Insulation: mitigating the impact on areas likely to be affected by noise including through noise insulation when the impact is on a building. | |

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| | | Contractor(s) will then identify the required site-specific mitigation measures and update the Outline NVMP into an NVMP accordingly to ensure the measures are implemented. |
| 5.12.15 | The project should demonstrate good design through selection of the quietest or most acceptable cost-effective plant available; containment of noise within buildings wherever possible, taking into account any other adverse impacts that such containment might cause (e.g. on landscape and visual impacts; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission). | The Project has been designed following the mitigation hierarchy as far as practicable with the route alignment being sited and designed to avoid NSRs including settlements and residential areas, passing predominantly through rural areas, with the majority of nearby NSRs comprising isolated dwellings and small settlements. As set out in **Application Document 7.3 Register of Environmental Actions and Commitments** triple Araucaria conductors (or alternative technology that performs the same or better in relation to noise) are proposed along the majority of the route (with the exception potentially of the River Ouse crossing and realignment of the existing ZDA route between Ealand and west of Keadby where flexibility is required). This is the best design for reducing the effects of line crackle (corona discharge) and would reduce the generation of noise from the proposed overhead line during operation, demonstrating selection of quieter plant. |
| 5.12.16 | A development must be undertaken in accordance with statutory requirements for noise. Due regard must be given to the relevant sections of the Noise Policy Statement for England, the NPPF, and the government's associated planning guidance on noise. In Wales the relevant policy will be PPW and the TANs, as well as the Welsh Government's Noise and Soundscape Action Plan. | The assessment of noise and vibration effects described in **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** has due regard for the relevant sections of the NPPF and the government's associated planning guidance including the Noise Policy Statement for England. |
| 5.12.17 | The Secretary of State should not grant development consent unless they are satisfied that the proposals will meet the following aims, through the effective management and control of noise:<br>• Avoid significant adverse impacts on health and quality of life from noise;<br>• Mitigate and minimise other adverse impacts on health and quality of life from noise; and<br>• Where possible, contribute to improvements to health and quality of life through the effective management and control of noise. | **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing** includes an assessment of the likely significant effects of the Project on health and wellbeing including noise and vibration, and concludes that following the implementation of embedded, control and management measures, there would be no significant adverse effects on human health as a result of the construction, operation and maintenance of the Project.<br>With the implementation of design and control measures, potential significant adverse effects for NSRs during the construction and operation (including maintenance) of the Project can be minimised and avoided. While potential adverse effects are anticipated at seven residential NSRs due to activities including pylon construction, construction access tracks/highways construction and potential underground cabling, these are considered to be acceptable following the implementation of BPM and no significant effects are anticipated in accordance with the requirements of NPS EN-1 paragraph 5.12.17 |
| 5.12.18 | When preparing the Development Consent Order, the Secretary of State should consider including measurable requirements or specifying the mitigation measures to be put in place to ensure that noise levels do not exceed any limits specified in the development consent. These requirements or mitigation measures may apply to the construction, operation, and decommissioning of the energy infrastructure development. | A detailed noise impact assessment is provided in **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** which concludes no significant effects are anticipated as a result of the Project during construction or operation.<br>Measures relevant to the mitigation of impacts and noise abatement technologies during construction and operation (including maintenance) of the Project are included in **Application Document 7.2 Outline Code of Construction Practice**, **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.7 Outline Noise and Vibration Management Plan**. These include maximum noise levels that the Project should not exceed. Detailed plans which must be substantially in accordance with these outline management plans will be brought forward post consent as secured by **Application Document 3.1 Draft Development Consent Order.** |

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| **5.13 Socio-Economic Impacts** | | |
| 5.13.2 | Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the ES (see Section 4.3). | **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** provides an assessment of the likely significant impacts of the Project on local and regional socio-economics. |
| 5.13.3 | The applicant is strongly encouraged to engage with relevant local authorities during early stages of project development so that the applicant can gain a better understanding of local or regional issues and opportunities. | National Grid has engaged with relevant stakeholders throughout the evolution of the Project, including the host local authorities Bassetlaw District Council, Nottinghamshire County Council, East Riding of Yorkshire Council and North Lincolnshire Council, to better understand local and regional issues or opportunities. A summary of discussions, and how they have influenced the scope and the approach to the socio-economics, recreation and tourism assessment, is provided in **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism**. |
| 5.13.4 | The applicant's assessment should consider all relevant socioeconomic impacts, which may include:<br>• The creation of jobs and training opportunities. Applicants may wish to provide information on the sustainability of the jobs created, including where they will help to develop the skills needed for the UK's transition to Net Zero;<br>• The contribution to the development of low-carbon industries at the local and regional level as well as nationally;<br>• The provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities;<br>• Any indirect beneficial impacts for the region hosting the infrastructure, in particular in relation to use of local support services and supply chains;<br>• Effects (positive and negative) on tourism and other users of the area impacted;<br>• The impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and could alter the demand for services and facilities in the settlements nearest to the construction work (including community facilities and physical infrastructure such as energy, water, transport and waste). There could also be effects on social cohesion depending on how populations and service provision change as a result of the development; and<br>• Cumulative effects - if development consent were to be granted for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region. | The assessment carried out in **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** is in accordance with this policy. **Application Document 6.20 Environmental Statement Chapter 20 Intra-project Cumulative Effects** and **Application Document 6.21 Environmental Statement Chapter 21 Inter-project Cumulative Effects** set out the cumulative impacts of the Project in relation to socio-economics. |
| 5.13.5 | Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to how the development's socio-economic impacts correlate with local planning policies. | **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** provides a description of the existing socio-economic conditions in the areas surrounding the Project, and **Application Document 5.5 Planning Statement** refers to how the Project's socio-economic impacts correlate with local planning policies. |
| 5.13.6 | Socio-economic impacts may be linked to other impacts, for example visual impacts considered in Section 5.10 but may also have an impact on tourism and local businesses. Applicants are encouraged, where possible, to demonstrate that local suppliers have been considered in any supply chain. | **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** provides an assessment of the Project's impacts on tourism and local businesses in sections 17.7 and 17.9. This includes an assessment of impacts on the integrity of tourist attractions and business premises, the impact on jobs in the supply chain during construction and the impact of a changing influx of construction workers on the availability of local accommodation facilities. |

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| 5.13.7 | Applicants should consider developing accommodation strategies where appropriate, especially during construction and decommissioning phases, that would include the need to provide temporary accommodation for construction workers if required. | **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** concludes that during construction there would be sufficient capacity to accommodate the workforce within a 60-minute drive time from the Order Limits of the Project. Decommissioning has been scoped out of the ES as explained in **Application Document 6.5 Environmental Statement Chapter 5 Environmental Impact Assessment Approach and Methodology**, and agreed with the Planning Inspectorate. |
| 5.13.8 | The Secretary of State should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development. For example, high quality design can improve the visual and environmental experience for visitors and the local community alike. | As set out in **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism**, environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features as far as reasonably practicable. National Grid has also embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (including maintenance) of the Project. Mitigation measures have been embedded into the Project design such as sensitive routeing and siting of infrastructure and temporary works to avoid or reduce impacts on socio-economics, recreation and tourism receptors, and limiting construction activities to defined daytime core working hours, reducing general disruption to nearby communities, local businesses, and tourism/recreation receptors. Control and management measures are also proposed during construction to protect local communities, tourism facilities and businesses, as well as PRoWs. These are set out in **Application Document 7.3 Register of Environmental Actions and Commitments** which will be secured by **Application Document 3.1 Draft Development Consent Order**. |
| 5.13.9 | The Secretary of State should have regard to the potential socioeconomic impacts of new energy infrastructure identified by the applicant and from any other sources that the Secretary of State considers to be both relevant and important to its decision. | National Grid has set out the potential socio-economic impacts of the Project in **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism**, for consideration by the Secretary of State. |
| 5.13.10 | The Secretary of State may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS). | Noted. |
| 5.13.11 | The Secretary of State should consider any relevant positive provisions the applicant has made or is proposing to make to mitigate impacts (for example through planning obligations) and any legacy benefits that may arise as well as any options for phasing development in relation to the socio-economic impacts. | The Project is not proposing any planning obligations as there are no obligations considered necessary to mitigate any impacts. All mitigation is set out in the relevant management plans which will be secured by the DCO.<br>As committed to in **Application Document 7.3 Register of Environmental Actions and Commitments** the Project is committed to adopting a sustainable approach to development by proactively exploring measures to ensure that the Project leaves the environment in a better condition than it was before development (including but not limited to delivering 10% Biodiversity Net Gain (BNG) with environmental and societal benefits). The Project will seek to provide strategic habitat enhancement and creation, aiming to identify and implement opportunities to improve habitat quality and connectivity and align with national nature recovery objectives and projects. Such measures may include specific habitat creation and enhancement measures and additional receptor-specific measures such as the creation of habitat piles and installation of bird and bat boxes.<br>National Grid has considered the Government's Guidance on Community Funds for Transmission Infrastructure, and is aiming to provide community benefit funding. Any funding would be available after the Project is granted development consent and construction work has started. The community benefit fund for North Humber to High Marnham could be in the region of around £18 million. In early 2026 National Grid launched a Community Benefit survey for the Project which allows local communities to let National Grid know where community benefit funding could leave long-lasting benefits. If the Project is granted development consent, National Grid will work closely with local communities to identify where community benefits funds could be spent. |

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| 5.13.12 | The Secretary of State may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities, including apprenticeships, education, engagement with local schools and colleges and training programmes to be enacted. | **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** states that the Project would result in a minor beneficial impact on employment, and gross value added (GVA) during construction due to the employment of construction workers from the local area. Prior to the commencement of construction works, National Grid and the Main Works Contractor(s) will produce and comply with a Skills, Supply Chain, and Employment Plan, as secured through a commitment within **Application Document 7.3 Register of Environmental Actions and Commitments**. |
| **5.14 Traffic and Transport** | | |
| 5.14.5 | If a project is likely to have significant transport implications, the applicant's ES (see Section 4.3) should include a vision for transport and an assessment of potential transport impacts. | **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** provides an assessment of the likely significant impacts of the Project on traffic and transport in accordance with this policy. The chapter has been prepared using the National Planning Practice Guidance for Travel Plans, Transport Assessments and Statements (Department for Communities and Local Government, 2014) and includes the components that typically form part of a Transport Assessment (see **Application Document 7.15 Transport Assessment**). The Project is not expected to have significant transport implications, and the approach to **Application Document 7.15 Transport Assessment** has been agreed with the relevant local highway authorities and National Highways (as custodians of the Strategic Road Network). |
| 5.14.7 | National Highways and Highways Authorities are statutory consultees on NSIP applications including energy infrastructure where it is expected to affect the strategic road network and / or have an impact on the local road network. Applicants should consult with National Highways and Highways Authorities as appropriate on the assessment, including any reasonable future tested scenarios and mitigation to inform the application to be submitted. | National Grid has engaged with relevant stakeholders throughout the evolution of the Project, including Nottinghamshire County Council, East Riding of Yorkshire Council, North Lincolnshire Council and National Highways. **Application Documents 5.8.4 and 5.8.6 to 5.8.8 Statements of Common Ground** have also been submitted setting out ongoing discussions with these stakeholders in further detail.<br>A summary of discussions and how these have influenced the scope and the approach to the traffic and transport assessment are provided in **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport**. |
| 5.14.8 | The applicant should prepare a travel plan adopting a vision-led approach to identify demand management and monitoring and fallback measures that proactively mitigate transport impacts by providing details of proposed measures to improve access by active, public and shared transport to:<br>• Reduce the need for parking associated with the proposal;<br>• Contribute to decarbonisation of the transport network; and<br>• Improve user travel options by offering genuine modal choice. | An Outline Construction Workforce Travel Plan is included within **Application Document 7.4 Outline Construction Traffic Management Plan** which sets out the principles, objectives and minimum requirements for managing construction workforce travel in a sustainable manner, and contribute to decarbonisation of the transport network. Its main objectives are to:<br>• Minimise the number of single-occupancy car trips generated by the construction workforce;;<br>• Promote sustainable modes of travel where reasonably practicable, including walking, cycling, public transport and shared transport;<br>• Manage workforce travel in a way that minimises impacts on the local highway network and surrounding communities; and<br>• Ensure construction workforce travel is planned, monitored and managed in a transparent and auditable manner.<br>The Outline Construction Workforce Travel Plan forms part of the **Application Document 7.4 Outline Construction Traffic Management Plan** which will be secured by **Application Document 3.1 Draft Development Consent Order**. |
| 5.14.12 | Where mitigation is needed, possible demand management measures must be considered. This could include identifying opportunities to:<br>• Reduce the need to travel by consolidating trips;<br>• Locate development in areas already accessible by active travel and public transport;<br>• Provide opportunities for shared mobility;<br>• Re-mode by shifting travel to a sustainable mode that is more beneficial to the network; | Demand management measures identified as part of the mitigation of the Project are reported in **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** as well as in **Application Document 7.4 Outline Construction Traffic Management Plan**. They include:<br>• Strategically located and optimised construction access tracks (haul roads) along the Project alignment to support construction of the Project and reduce the effects of construction traffic movements on the local public highway network during construction. |

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| | • Retime travel outside of the known peak times; and<br>• Reroute to use parts of the network that are less busy. | • Inclusion of largely continuous construction access tracks, breaking only as a result of major roads, railways, areas of environmental constraints and / or major watercourses.<br>• Construction working hours that require construction workers to travel to work outside of peak travel times.<br>Measures set out in the Outline Construction Workforce Travel Plan which forms part of **Application Document 7.4 Outline Construction Traffic Management Plan**.<br>**Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** states that the proposed temporary car parks for construction workers within the site compounds will include electric vehicle charging facilities.<br>As set out in **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport**, the use of alternative transport modes, including both rail and waterborne transport, has been considered. An assessment of the available transport infrastructure, site access requirements and construction logistics concluded that road transport represents the most practical, efficient, and feasible means of transporting materials, plant, and equipment required for the construction of the Project. Accordingly, road-based transport has been adopted as the primary mode for construction-related movements. Engagement has been undertaken with the Canal and River Trust which confirmed that the use of canals would not be appropriate for construction traffic for the movement of construction materials as set out in **Application Document 5.1 Consultation Report Appendix K Responses to Statutory and Prescribed Consultees.** |
| 5.14.13 | If feasible and operationally reasonable, such mitigation should be required, before considering requirements for the provision of new inland transport infrastructure to deal with remaining transport impacts. All stages of the project should support and prioritise a modal shift of freight from road to more environmentally sustainable alternatives, such as rail, cargo bike, maritime and inland waterways, as well as making appropriate provision for and infrastructure needed to support the use of alternative fuels including charging for electric vehicles. | |
| 5.14.14 | Regard should always be given to the needs of freight at all stages in the construction and operation of the development including the need to provide appropriate facilities for HGV drivers as appropriate. | **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** sets out how the needs of freight and HGV have been considered at all stages of the construction and operation of the Project. |
| 5.14.15 | The Secretary of State may attach requirements to a consent where there is likely to be substantial HGV traffic that:<br>• Control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements;<br>• Make sufficient provision for HGV parking, and associated high quality drive facilities either on the site or at dedicated facilities elsewhere, to support driver welfare, avoid 'overspill' parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions; and<br>• Ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force. | **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** concludes that, with the application of embedded mitigation and control and management measures, there would be no significant adverse effects in relation to HGV traffic during construction and operation. Measures relating to the control and management of HGVs are set out in **Application Document 7.4 Outline Construction Traffic Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**. |
| 5.14.17 | Applicants should consider the DfT policy guidance "Water Preferred Policy Guidelines for the movement of abnormal indivisible loads" when preparing their application. | DfT policy guidance "Water Preferred Policy Guidelines for the movement of abnormal indivisible loads" has been considered when preparing **Application Document 7.4 Outline Construction Traffic Management Plan Appendix A AIL Access Strategy**. |
| 5.14.19 | A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the Secretary of State should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development and by enhancing active, public and shared transport provision and accessibility. | **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** concludes that following the implementation of control and management measures, there would be no significant adverse effects in relation to transport during construction and operation with respect to Primary Access Routes (PARs), non-motorised user delay and amenity, fear and intimidation, driver delay, highway safety, PRoWs, road diversions and/or closures, hazardous/large loads, and waterways. These control and management measures are set out in **Application Document 7.4 Outline Construction Traffic Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**.. |
| 5.14.20 | Where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the Secretary of State should consider requirements to mitigate adverse impacts on transport networks arising from the development, as set out below. | |

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| 5.14.21 | Development consent should not be withheld provided that the applicant is willing to enter into planning obligations for funding new infrastructure or requirements can be imposed to mitigate transport impacts. In this situation the Secretary of State should apply appropriately limited weight to residual effects on the surrounding transport infrastructure. | |
| 5.14.22 | The Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision. | |
| **5.15 Resource and Waste Management** | | |
| 5.15.6 | Applicants must ensure that all proposals align with circular economy objectives. In England, applicants must demonstrate that development proposals are in line with Defra's policy statement on the role of EfW in treating residual waste. | **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project** sets out the approach to materials and waste. The nature of the Project means that it is difficult to use secondary (reused/recycled) sources during its construction, as this can affect the operation and the design life of the Project. However, National Grid has existing processes in place to obtain materials from sustainable sources and to use recycled materials where these do not compromise the required design standards and operational life of the Project.<br>Temporary materials, such as aggregate for access routes and site compounds, works cabins, and security fencing, would be required during construction. Where practicable, temporary materials would be sourced from other construction projects within the region and reused at other construction projects after completion of the Project.<br>**Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.2 Outline Code of Construction Practice** set out that a Site Waste Management Plan (SWMP) will be developed prior to construction which would have regard to Defra's Residual waste infrastructure capacity note. The SWMP will include but not be limited to:<br>• Waste forecasts;<br>• How waste will be reduced, re-used, managed and disposed of in accordance with the waste hierarchy;<br>• Identification of recovery routes; and<br>• Actual waste figures once work has begun.<br>Consideration will be given to the guidance in The Definition of Waste: Development Industry Code of Practice (CL:AIRE, 2011). Dedicated waste management areas will be designed to sufficiently accommodate the types and volumes of waste produced and to reduce the environmental risk of storing waste on-site (covered, secured and away from drainage) in accordance with **Application Document 7.3 Register of Environmental Actions and Commitments**. |
| 5.15.7 | The applicant should set out the arrangements that are proposed for managing any waste produced and prepare a report that sets out the sustainable management of waste and use of resources throughout any relevant demolition, excavation and construction activities. | |
| 5.15.8 | The arrangements described and a report setting out the sustainable management of waste and use of resources should include information on how re-use and recycling will be maximised in addition to the proposed waste recovery and disposal system for all waste generated by the development. They should also include an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation. | |
| 5.15.9 | The applicant must consider the Circular Economy and how to ensure that their project aligns with the government's circular economy ambitions. In Wales applicants are encouraged to refer to 'Towards Zero Waste: Our Waste Strategy for Wales. | |
| 5.15.11 | The UK is committed to transitioning to a circular economy, a future where resources are kept in use for longer, and waste is reduced; we accelerate the path to net zero, we see investment in critical infrastructure and green jobs, our economy prospers, and nature thrives. Where possible, applicants are encouraged to source materials from recycled or reused sources and use low carbon materials, sustainable sources and local suppliers. Construction best practices should be used to ensure that material is reused or recycled onsite where possible. | |
| 5.15.12 | Applicants are also encouraged to prepare a construction materials management plan to inform the use of construction best practices in relation to storing materials in an adequate and protected place on site to prevent waste, or degeneration of valuable materials, for example, from accidental damage or excessive weathering. The use of Building Information Management tools (BIM, or similar) to record the materials used in construction can help to reduce waste and realise further value in future decommissioning of facilities, by identifying materials that can be recycled or reused. | |
| 5.15.13 | The Secretary of State should consider the extent to which the applicant has proposed an effective system for managing hazardous and non-hazardous waste arising from the construction, operation and decommissioning of the proposed development. | As set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, all use and storage of chemicals and fuels are to be undertaken in accordance with Environment Agency guidance and The Control of Pollution (Oil Storage) (England) Regulations 2001 (HM Government, 2001). The use and storage of chemicals and fuels will also be controlled and monitored under the detailed Code of Construction Practice which will include, for example, procedures for good general construction site practices, environmental and waste management procedures, regular vehicle checks, use of spill kits, correct waste storage and disposal, use of oil-water separators as necessary (for |

| Para | NPS EN-1 Policy Requirement | |
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| | | example, for drainage from refuelling areas), collection of process water from the washout/cleaning of ready-mix concrete vehicles and equipment for treatment/disposal. |
| 5.15.14 | The Secretary of State should be satisfied that:<br>• Any such waste will be properly managed, both on-site and off-site;<br>• The waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area; and<br>• Adequate steps have been taken to give consideration to the circular economy, minimise the volume of waste arisings, and of the volume of waste arisings sent for recovery or disposal, except where that is the best overall environmental outcome. | Soil may need to be removed from site in certain circumstances, such as where the soil was found to be contaminated. Soil removal would be managed in an appropriate manner, as set out in the good practice measures within **Application Document 7.5 Outline Soil Management Plan**.<br>**Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.2 Outline Code of Construction Practice** set out the measures proposed by National Grid to reduce and manage waste, and set out that a Site Waste Management Plan (SWMP) will be developed prior to construction. The SWMP will include but not be limited to:<br>• Waste forecasts;<br>• How waste will be reduced, re-used, managed and disposed of in accordance with the waste hierarchy;<br>• Identification of recovery routes; and<br>• Actual waste figures once work has begun.<br>Consideration will be given to the guidance in The Definition of Waste: Development Industry Code of Practice (CL:AIRE, 2011). Dedicated waste management areas will be designed to sufficiently accommodate the types and volumes of waste produced and to reduce the environmental risk of storing waste on-site (covered, secured and away from drainage) in accordance with **Application Document 7.3 Register of Environmental Actions and Commitments**. |
| 5.15.15 | Where necessary, the Secretary of State should use requirements or obligations to ensure that appropriate measures for waste management are applied. | |
| 5.15.16 | The Secretary of State may wish to include a condition on revision of waste management plans at reasonable intervals when giving consent. | |
| 5.15.17 | Where the project will be subject to the Environmental Permitting regime, waste management arrangements during operations will be covered by the permit and the considerations set out in Section 4.12 will apply. | |
| 5.15.19 | The Secretary of State should have regard to any potential impacts on the achievement of resource efficiency and waste reduction targets set under the Environment Act 2021 and circular economy objectives. | |
| **5.16 Water Quality and Resources** | | |
| 5.16.3 | Where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment, and how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment, as part of the ES or equivalent (see Section 4.3 and 4.10). | **Application Document 6.11 Environmental Statement Chapter 11 Water Environment** sets out an assessment of the impacts of the Project on water quality, resources and sets out characteristics of the water environment. The assessment has been informed by a Water Framework Directive (WFD) Assessment included in **Application Document 7.12 Water Framework Directive Assessment**.<br>**Application Document 7.13 Flood Risk Assessment** assesses flood risk from all relevant forms of flooding, including consideration of climate change. |
| 5.16.4 | The applicant should make early contact with the relevant regulators, including the local authority, the EA and Marine Management Organisation, where appropriate, for relevant licensing and environmental permitting requirements. Applicants should make early contact with the EA, NRW and water companies with their proposed water requirements to understand whether water is available and if new water infrastructure is required. If insufficient water is available for abstraction the EA and NRW will be unable to authorise an abstraction licence. | Section 11.3 of **Application Document 6.11 Environmental Statement Chapter 11 Water Environment** provides a summary of the relevant engagement relating to the water environment. National Grid has engagement with the Environment Agency, Marine Management Organisation, Isle of Axholme and North Nottinghamshire Water Level Management Board, Anglian Water, relevant local authorities and LLFAs.<br>Feedback from these stakeholders informed the assessment and details of consultation responses and how these informed the assessment can be found in **Application Document 5.1 Consultation Report**. |
| 5.16.7 | The ES should in particular describe:<br>• The existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges;<br>• Existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including | **Application Document 6.11 Environmental Statement Chapter 11 Water Environment** presents an assessment of the likely significant effects that could result from the Project. The assessment sets out existing water quality and resources and considers potential impacts upon the water environment, waterbodies and protected areas, the effects of climate change and cumulative effects. |

| Para | NPS EN-1 Policy Requirement | |
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| | any impact on or use of mains supplies and reference to Abstraction Licensing Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance;<br>• Existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project and any impact of physical modifications to these characteristics;<br>• Any impacts of the proposed project on water bodies or protected areas (including shellfish protected areas) under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and source protection zones (SPZs) around potable groundwater abstractions;<br>• How climate change could impact any of the above in the future; and<br>• Any cumulative effects. | |
| 5.16.8 | The Secretary of State should consider whether mitigation measures are needed over and above any which may form part of the project application. A construction management plan may help codify mitigation at that stage. | Measures to mitigate potential adverse effects on the water environment during construction are included in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**. |
| 5.16.10 | The risk of impacts on the water environment can be reduced through careful design to facilitate adherence to good pollution control practice. For example, designated areas for storage and unloading, with appropriate drainage facilities, should be clearly marked. | |
| 5.16.12 | Activities that discharge to the water environment are subject to pollution control. The considerations set out in Section 4.12 on the interface between planning and pollution control therefore apply. These considerations will also apply in an analogous way to the abstraction licensing regime regulating activities that take water from the water environment, and to the control regimes relating to works to, and structures in, on, or under controlled waters. | Discharges from the Project to local watercourses are possible during construction. Effects from potential Project discharges would be mitigated through measures GG16, GG17, and W05 of **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, which will safeguard watercourses from unregulated Project discharges. |
| 5.16.13 | The Secretary of Secretary of State will need to give impacts on the water environment more weight where a project would have an adverse effect on the achievement of the environmental objectives established under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017. | The assessment in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment** has been prepared with reference to the specific objectives set for relevant waterbodies within the Humber River Basin District River Management Plan.<br>**Application Document 7.12 Water Framework Directive Assessment** assesses whether the Project would comply with the requirements of the Water Framework Directive (England and Wales) Regulations 2017 (WFD Regulations) (HM Government, 2017). The assessment has followed a staged approach and has been informed through extensive engagement with the Environment Agency.<br>The assessment concludes that the Project is compliant with the objectives of the WFD Regulations, including preventing any deterioration in the status of a waterbody, and when considering the potential for cumulative effects. On this basis, no further assessment is proposed and no WFD derogations under Regulation 19 of the WFD Regulations would be required. |
| 5.16.15 | The Secretary of State should be satisfied that a proposal has regard to current River Basin Management Plans and meets the requirements of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (including regulation 19). The specific objectives for particular river basins are set out in River Basin Management Plans. The Secretary of State must refuse development consent where a project is likely to cause deterioration of a water body or its failure to achieve good status or good potential, unless the requirements set out in regulation 19 are met. A project may be approved in the absence of a qualifying Overriding Public Interest test only if there is sufficient certainty that it will not cause deterioration or compromise the achievement of good status or good potential. | |

## 2.2 National Policy Statement for electricity networks infrastructure (EN-5)

Table 2.2 – Signposting for Compliance with EN-5

| Para | NPS EN-5 Policy Requirement | Project Compliance |
|---|---|---|
| **Introduction** | | |
| ***1.6 Infrastructure covered by this NPS*** | | |
| 1.6.2 | This NPS covers above ground electricity lines:<br>• Whose nominal voltage is expected to be 132kV or above (other than a 132kV line associated with the construction or extension of a devolved Welsh generating station);<br>• Whose length is greater than 2km;<br>• That are not a replacement line falling within section 16(3)(ab) of the Planning Act 2008; and<br>• That are not otherwise exempted for reasons set out in sections 16(3)(b) and (c), (3A) and (3B) of the Planning Act 2008. | The Project comprises the installation of an electric line above ground of more than 2 km, which will operate at 400 kV, in England. It does not comprise a replacement line falling within section 16(3)(ab) of the Planning Act 2008 (HM Government, 2008); and is not otherwise exempted for reasons set out in sections 16(3)(b) and (c), (3A) and (3B) of the Planning Act 2008. |
| **Assessment and Technology Specific Information** | | |
| ***2.1 Introduction*** | | |
| 2.1.5 | As stated in Section 4.2 of EN-1, to support the urgent need for new low carbon infrastructure, all power lines in scope of EN-5 including electricity network reinforcement and upgrade works, and associated infrastructure such as substations, are considered to be CNP infrastructure. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System. | As confirmed by this paragraph, the Project, comprising of the reinforcement and upgrade works of the electricity network in scope of EN-5, is considered to be CNP infrastructure as it will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System. |
| 2.1.6 | The assessment principles outlined in Part 4 of EN-1 continue to apply to CNP infrastructure. Applicants must show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. Early application of the mitigation hierarchy is strongly encouraged, as is engagement with key stakeholders including Statutory Nature Conservation Bodies (SNCBs), both before and at the formal pre-application stage. | **Application Documents 6.1 to 6.22 Environmental Statement** considers the assessment principles outlined in Part 4 of NPS EN-1 and shows how any likely significant negative effects resulting from the Project would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy.<br>Early application of the mitigation hierarchy has been adopted as demonstrated in **Application Document 5.9 Design Development Report**, and National Grid has engaged with key stakeholders including Statutory Nature Conservation Bodies (SNCBs), both before and at the formal pre-application stage as demonstrated in **Application Document 5.1 Consultation Report**. |
| ***2.2 Factors influencing site selection and design*** | | |
| 2.2.1 | The Secretary of State should bear in mind that the initiating and terminating points – or development zone – of new electricity networks infrastructure is not substantially within the control of the applicant. | **Application Document 5.9 Design Development Report** provides an overview of the design rationale for the Project and explains how the Project has sought to avoid or reduce significant environmental effects, including landscape and visual effects, wherever practicable, from the initial option identification and selection stage, up to the refinement of the Project in response to feedback, and developing the design informed by ongoing assessment.<br>The Project's strategic proposals set out in **Application Document 7.17 Strategic Options Report Including Needs Case** outlined that, without reinforcement, the transmission system between the north and south of England will have insufficient capacity to accommodate contracted and predicted generation connections in the area.<br>Following the assessment of options to meet system need, it was proposed to take forward the Project to deliver a new, primarily overhead line connection between a new Birkhill Wood Substation to a new High Marnham Substation. **Application Document 7.17 Strategic Options Report** |
| 2.2.2 | Siting is determined by:<br>• The location of new generating stations or other infrastructure requiring connection to the network, and/or<br>• System capacity and resilience requirements determined by the NESO. | |
| 2.2.3 | These twin constraints, coupled with the government's legislative commitment to net zero by 2050, government's expectation of 12- 14GW of interconnector capacity by 2030, and an ambition of accelerating the deployment of clean energy capacity and energy storage | |

| Para | NPS EN-5 Policy Requirement | Project Compliance |
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| | to meet our ambitions for the Clean Power 2030 Mission, means that very significant amounts of new electricity networks infrastructure is required, including in areas with comparatively little build-out to date. | **Including Needs Case** sets out the need case for the Project and describes how option appraisals were undertaken leading to the proposed design. As demonstrated in this document, it has been concluded that the Project remains the best overall option to solve the need case when balancing cost, technical performance and environmental and socio-economic effects.<br>Following the selection of the chosen strategic option, a Corridor and Preliminary Routeing and Siting Study (CPRSS) was undertaken in 2023 to further define the location of the proposed Project infrastructure within a defined study area (**Application Document 7.18 Corridor and Preliminary Routeing and Siting Study**).<br>The site selection process and consideration of alternatives are summarised in **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered**, which shows that a wide range of alternatives were considered in the design of the Project, taking into account the EIA process, ground investigations and feedback from consultees received from formal consultation exercises and project meetings.<br>The Project would support the UK's net zero target by reinforcing the electricity transmission network between the North of England and the Midlands and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The Project would help meet future energy requirements. |
| 2.2.5 | Additionally, applicants retain control in managing the identification of routing and site selection between the identified initiating and terminating points or within the development zone. | As set out in **Application Document 5.10 Design Approach Document**, the approach to routeing and siting has followed a structured options identification and selection process, consistent with National Grid's Approach to Consenting (Grid, 2022). The routeing and site selection process considers the site-selection considerations set out in NSP EN-5 as well as policies on good design and impact mitigation in section 2.4 and 2.10 of this NPS.<br>The design approach has included the consideration and appraisal of reasonable alternatives, informed by environmental, technical, socio-economic and cost factors, and guided by established routeing principles, including the Holford guidance. This process culminated in the identification of a preferred alignment which seeks, where practicable, to minimise environmental and community effects, including through the use of close parallel routeing with existing overhead lines where this represents the most appropriate balance of considerations.<br>The design has evolved through ongoing engagement and consultation, including both non-statutory and statutory stages. Feedback from local communities, landowners, statutory consultees and other stakeholders has been carefully considered alongside environmental assessments and engineering studies to inform refinements to routeing, siting, access arrangements and construction methodology. |
| 2.2.6 | Moreover, the locational constraints identified above do not, of course, exempt applicants from their duty to consider and balance the site-selection considerations set out below, much less the policies on good design and impact mitigation detailed in Section 2.4 and Section 2.10. | |
| 2.2.7 | The connection between the initiating and terminating points of a proposed new electricity line will often not be via the most direct route. Siting constraints, such as engineering, environmental or community considerations will be important in determining a feasible route. | |
| 2.2.8 | There will usually be a degree of flexibility in the location of the development's associated infrastructure such as substations, and applicants should consider carefully their location, as well as their design. | The consideration of the location and design of the Project's associated infrastructure has been carefully considered, taking account of environmental constraints, engagement and consultation, and ongoing assessments and studies, as set out in **Application Document 5.10 Design Approach Document** and **Application Document 5.9 Design Development Report**.<br>Following statutory consultation on the Project in 2025, a decision was taken to remove both the proposed 400 kV Birkhill Wood Substation and 400 kV High Marnham Substation and associated works from the Project.<br>Separate planning applications for the 400 kV Birkhill Wood Substation (25/01898/STPLF), and 400 kV High Marnham Substation (25/01302/FUL) were submitted by National Grid in July and November 2025 to the local planning authorities of East Riding of Yorkshire Council and Bassetlaw District Council, respectively. The planning applications have subsequently been approved in 2026. |
| 2.2.9 | In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts (See Sections 2.9 – 2.10 below and Section 5.10 in EN-1.). | Embedded mitigation measures have been integral in reducing, and where possible, avoiding, the landscape and visual effects of the Project. Landscape and visual matters were considered in the early stages of siting and design. **Application Document 5.9 Design Development Report** provides an overview of the design rationale for the Project. It explains how the Project has sought |

| Para | NPS EN-5 Policy Requirement | Project Compliance |
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| | | to avoid or reduce significant environmental effects, including landscape and visual effects, wherever practicable, from the initial option identification and selection stage up to the refinement of the Project in response to feedback, further assessments and design work.<br>The site selection process and consideration of alternatives are also summarised in **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered**, which shows that a wide range of alternatives were considered in the design of the Project, taking into account the EIA process, ground investigations and feedback from consultees received from formal consultation exercises and project meetings.<br>Relevant embedded measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments** |
| 2.2.10 | As well as having duties under section 9 of the Electricity Act 1989, (in relation to developing and maintaining an economical and efficient network), applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to "have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and …do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects." | As set out in **Application Document 5.10 Design Approach Document**, throughout the design process, sustainability considerations have been balanced alongside engineering, environmental, socio-economic and cost considerations. This has included avoiding or reducing impacts on environmentally sensitive receptors including flora, fauna and geological or physiographical features of special interest and protecting sites, buildings and objects of architectural, historic or archaeological interest through routeing and siting. It has also included making efficient use of land by maximising close parallel routeing with existing electricity transmission infrastructure where reasonably practicable. Construction impacts have been reduced through the refinement of access arrangements, working areas and construction methodologies. Embedded environmental mitigation has been incorporated into the design wherever reasonably practicable to avoid and reduce impacts on these features, and the commitments made by National Grid for this Project are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, which will be secured by **Application Document 3.1 Draft Development Consent Order**. |
| 2.2.11 | Depending on the location of the proposed development, statutory duties under section 85 of the Countryside and Rights of Way Act 2000, section 11A of the National Parks and Access to the Countryside Act 1949 (as amended by section 62 of the Environment Act 1995), and section 17A of the Norfolk and Suffolk Broads Act 1988 may be relevant. Applicants should note amendments to each of these provisions contained in section 245 of the Levelling Up and Regeneration Act 2023. | The Project is not located within, or will have any significant impacts to any National Landscape therefore this policy is not relevant. |
| 2.2.12 | Transmission and distribution licence holders are also required under Schedule 9 to the Electricity Act 1989 to produce and publish a statement setting out how they propose to perform this duty generally. | National Grid has prepared a statement setting out how it proposes to perform its duty under Schedule 9 of the Electricity Act 1989 which is titled National Grid's commitments when undertaking works in the UK – Our stakeholder, community and amenity policy. It was published in December 2019. |
| ***2.3 Climate change adaptation and resilience*** | | |
| 2.3.1 | Section 4.10 of EN-1 sets out the generic considerations that applicants and the Secretary of State should take into account in order to ensure that electricity networks infrastructure is resilient to the effects of climate change. | **Application Document 6.19 Environmental Statement Chapter 19 Climate Change** presents an assessment of the likely significant effects of the Project on the climate, and climate change effects that affect the Project and surrounding environment. The assessment considers how the Project has been designed to be resilient to the matters set out in paragraph 2.3.2.<br>**Application Document 6.19 Environmental Statement Chapter 19 Climate Change** explains the embedded measures which have been integral in reducing, and where possible avoiding, the climate change effects of the Project. National Grid has considered the impacts on climate change on the Project during the construction and operation (including maintenance) phases.<br>The Climate Change Impact Assessment presented in **Application Document 6.19 Environmental Statement Chapter 19 Climate Change** uses historical climate data, for the period 1991–2020, obtained from the Met Office, and the most recent climate change projections for the UK from UKCP18, to assess the likelihood, magnitude and significance of a range of climate change risks. In addition, data from the Global Facility for Disaster Reduction and Recovery's web tool has been |
| 2.3.2 | As climate change is likely to increase risks to the resilience of some of this infrastructure, from flooding for example, or in situations where it is located near the coast or an estuary or is underground, applicants should in particular set out to what extent the proposed development is expected to be vulnerable, and, as appropriate, how it has been designed to be resilient to:<br>• Flooding, particularly for substations that are vital to the network; and especially in light of changes to groundwater levels resulting from climate change;<br>• The effects of wind and storms on overhead lines;<br>• Higher average temperatures leading to increased transmission losses; | |

| Para | NPS EN-5 Policy Requirement | Project Compliance |
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| | • Earth movement or subsidence caused by flooding or drought (for underground cables); and<br>• Coastal erosion – for the landfall of offshore transmission cables and their associated substations in the inshore and coastal locations respectively. | used to assess other projected trends/impacts, and the UK Climate Change Risk Assessment analysed (Department for Environment, Food and Rural Affairs, 2022) for the current state of nationwide climate change risks. |
| 2.3.3 | Section 4.10 of EN-1 advises that the resilience of the project to the effects of climate change must be assessed in the Environmental Statement (ES) accompanying an application. For example, future increased risk of flooding would be covered in any flood risk assessment (see Section 5.8 in EN-1). Consideration should also be given to coastal change (see Section 5.6 in EN-1). | |
| ***2.4 Consideration of good design for energy infrastructure*** | | |
| 2.4.1 | The Planning Act 2008 requires the Secretary of State to have regard, in designating an NPS, and in determining applications for development consent, to the desirability of good design. | As set out in **Application Document 5.10 Design Approach Document**, the approach to routeing and siting has followed a structured options identification and selection process, consistent with National Grid's Approach to Consenting. The routeing and site selection process considers the site-selection considerations set out in NSP EN-5 as well as policies on good design and impact mitigation.<br>The Project has been designed following the mitigation hierarchy. At the routeing and siting stage, the Project design process was informed by the Holford guidance to avoid impacts where possible. These established guidelines informed the evaluation criteria and how the mitigation hierarchy was applied during the options selection process.<br>The design approach has included the consideration and appraisal of reasonable alternatives, informed by environmental, technical, socio-economic and cost factors, and guided by established routeing principles, including the Holford Guidance, in line with these policies.<br>This process culminated in the identification of a preferred alignment which seeks, where practicable, to minimise environmental and community effects, including through the use of close parallel routeing with existing overhead lines where this represents the most appropriate balance of considerations.<br>The design has evolved through ongoing engagement and consultation, including both non-statutory and statutory stages. Feedback from local communities, landowners, statutory consultees and other stakeholders has been carefully considered alongside environmental assessments and engineering studies to inform refinements to routeing, siting, access arrangements and construction methodology. |
| 2.4.2 | Applicants should consider the criteria for good design set out in EN1 Section 4.7, the Holford and Horlock rules and Electricity Transmission Design Principles (see Section 2.9 below) at an early stage when developing projects. | |
| 2.4.3 | However, the Secretary of State should bear in mind that electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an applicant's ability to influence the aesthetic appearance of that infrastructure. | |
| 2.4.4 | While the above principles should govern the design of an electricity networks infrastructure application to the fullest possible extent – including in its avoidance and/or mitigation of potential adverse impacts (particularly those detailed in Section 2.10 below) – the functional performance of the infrastructure in respect of security of supply and public and occupational safety must not thereby be threatened. | |
| ***2.5 Environmental and Biodiversity Net Gain*** | | |
| 2.5.1 | When planning and evaluating the proposed development's contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the generic guidance set out in EN-1 (Section 4.6) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to:<br>• Reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or<br>• Connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements. | |

| Para | NPS EN-5 Policy Requirement | Project Compliance |
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| ***2.6 Land Rights and Land Interests*** | | |
| 2.6.1 | In order to be lawfully able to install, inspect, maintain, repair, adjust, alter, replace or remove an electricity line (above or below ground), its related equipment (such as monopoles, pylons/transmission towers, transformers and cables), and/or its associated mitigation or enhancement schemes, applicants must:<br>• Own the land on, over, or under which the relevant activity is to take place; or<br>• Hold sufficient rights over or interests in that land (typically in the form of an easement); or<br>• Have permission for the activity from the present owner or occupier of that land (typically in the form of a wayleave) | National Grid is currently seeking to secure the necessary acquisitions and land rights through voluntary agreement but will utilise the powers of compulsory acquisition included in **Application Document 3.1 Draft Development Consent Order**, if necessary. Negotiations with affected landowners will continue after the submission of the application for development consent. |
| 2.6.2 | Where the applicant does not own or wish to own the land in question, it should try to reach a voluntary agreement giving it sufficient rights and/or permissions to undertake the relevant work. | |
| 2.6.3 | As a last resort, where it does not succeed in reaching the agreement that it requires, the network company may, as part of its application to the Secretary of State, seek to acquire rights compulsorily over the land in question by means of a provision in the DCO. | |
| 2.6.4 | In such cases (i.e. where the compulsory acquisition of rights is sought) permanent arrangements are strongly preferred over voluntary wayleaves (which could, for example, be terminable on notice by the landowner) in virtue of their greater reliability and economic efficiency and reflecting the importance of the relevant infrastructure to the government's Clean Power and net zero goals. | |
| 2.6.5 | The applicant may also seek the compulsory acquisition of land. This will not normally be necessary where lines and cables are installed but may be sought where other forms of electricity networks infrastructure (such as new substations) are required. | |
| 2.6.6 | As detailed in Section 4.1.8 of EN-1, where the use of land at a specific location is required to facilitate the development by providing for mitigation and landscape enhancement, an applicant may, as part of its application to the Secretary of State, seek the compulsory acquisition of that land, or rights over that land. The Secretary of State will consider any such application under the provisions of the Planning Act 2008 and any associated guidance. | |
| 2.6.7 | Ahead of securing land rights or interests for transmission infrastructure development itself, an applicant will, in many cases, need to obtain access to land to conduct technical and environmental surveys to inform their development proposals. Some of these will be seasonal species surveys meaning there are limited opportunities during the course of the year in which they can be undertaken; timely access for surveys can have a significant impact on overall project timelines. | Additional surveys will be required prior to the construction of the Project, and these will be carried out in accordance with the measures set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** to ensure they are undertaken with consideration of overall Project timelines. |
| ***2.7 Holistic planning*** | | |
| 2.7.1 | EN-1 explains that the Planning Act 2008 aims to create a holistic planning regime, such that the cumulative effects of the same project can be considered together. Co-ordinated applications typically bring economic efficiencies and reduced environmental impact. | Following statutory consultation and feedback received on the Project in 2025, a decision was taken to remove both the proposed 400 kV Birkhill Wood Substation and 400 kV High Marnham Substation and associated works from the Project.<br>Separate planning applications for the 400 kV Birkhill Wood Substation (25/01898/STPLF), and 400 kV High Marnham Substation (25/01302/FUL) were submitted by National Grid in July and November 2025 to the local planning authorities of East Riding of Yorkshire Council and Bassetlaw |
| 2.7.2 | Accordingly, the government envisages that, wherever reasonably possible, applications for new generating stations and their related infrastructure should be contained in a single application to the Secretary of State. However, a consolidated approach of this kind may | |

| Para | NPS EN-5 Policy Requirement | Project Compliance |
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| | not always be possible, nor represent the most efficient strategy for delivery of new infrastructure. | District Council, respectively. The planning applications have subsequently been approved in 2026. Alongside these planning applications, National Grid published a Compulsory Purchase Order (CPO) for acquisition of the land, to enable the delivery of each of the substations. Negotiations with landowners to acquire by agreement are still ongoing, and the CPO is forecast to be confirmed in late 2026.<br>A full description of the design evolution of the Project is provided in **Application Document 5.9 Design Development Report**. |
| 2.7.3 | This could be, for example, due to the differing lengths of time needed to prepare the applications for submission to the Secretary of State, or because a network application relates to multiple generation projects (which could be onshore or offshore), or because the works involved are strategic reinforcements required for a number of reasons. | |
| 2.7.4 | It may also be the case that the electricity networks infrastructure application and the application for a related generating station will of necessity come from different legal entities, or from entities subject to different commercial and regulatory frameworks. | |
| 2.7.5 | It will also be common for applications to be submitted for the general purpose of reinforcing the network, which will be critical to deliver especially in light of the drive towards net zero, including the ambition to radically increase the deployment of new low carbon generation to meet our Clean Power 2030 Mission. | |
| ***2.8 Strategic Network Planning*** | | |
| 2.8.1 | A more strategic approach to network planning is essential to ensure that network development keeps pace with renewable generation and anticipates future system needs. It is imperative that the strategic need for the infrastructure is given the highest priority given the urgency of bringing forward networks infrastructure. The time involved in bringing forward transmission projects underscores the importance of the strategic approach. | The Holistic Network Design (HND) for onshore-offshore transmission, its follow-up exercises and the forthcoming Centralised Strategic Network Plans have been considered in the design of the Project, as set out in **Application Document 7.17 Strategic Options Report Including Needs Case**.<br>**Application Document 5.11 Interrelationship Document** presents how the Project has considered and evaluated coordination for onshore and offshore electricity transmission infrastructure to minimise adverse impacts to the local environment and host communities. The document also responds to feedback from local stakeholders at the non-statutory and statutory consultation stages requesting the Project coordinates more closely with other large-scale terrestrial and marine electricity transmission projects. |
| 2.8.2 | Strategic network planning, specifically through the Holistic Network Design (HND), its follow up exercises and the forthcoming Centralised Strategic Network Plans, helps reduce the overall impact of infrastructure by identifying opportunities for coordination, where appropriate, and taking a holistic view of both the onshore and offshore network. Network plans will take account of environmental and community impacts, alongside deliverability, operability, and economic cost, from the outset. | |
| 2.8.3 | A strategic approach to network planning proposed through the Centralised Strategic Network Plan (CSNP) process will identify strategic investments intended to facilitate achieving net zero, energy security, and decarbonisation targets. | |
| 2.8.4 | In these cases (i.e. where the application is a reinforcement project in its own right and does not accompany an application for a generating station, or is not underpinned by a contractually-supported agreement to provide an as-yet-unconsented generating station with a connection), the Secretary of State should have regard to the need case for new electricity networks infrastructure set out in Section 3.3 of EN-1 with further detail set out here. | **Application Document 5.5 Planning Statement** and **Application Document 7.17 Strategic Options Report Including Needs Case** set out the needs case for the Project, and explain that the Project, if consented, would support the UK's net zero target by reinforcing the electricity transmission network between the North of England and the Midlands and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The Project would help meet future energy requirements and support the transition to a net zero economy. |
| 2.8.7 | The Secretary of State should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNOs) are required under section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design. | The Project will reinforce the transmission system in the North of England and the Midlands. Without reinforcement, the capacity of the existing network in the North of England and the Midlands is insufficient to accommodate the connection of proposed new power sources connecting in the area. This reinforcement will ensure that the Project will improve the existing electricity transmission network, and will contribute to energy independence, the UK's decarbonisation requirements and climate change targets, and assist in ensuring the supply of energy remains secure, reliable and affordable. As such, the Project is in accordance with this policy. |
| 2.8.8 | TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and have to provide a connection when requested. | |
| 2.8.10 | Where it can be demonstrated that such a set of works will reinforce the network as a whole, or reinforce the network to accommodate a subset of new connections, the Secretary of State should be willing – in line with the need statement set out in Section 3.3 of EN-1 – to accept an application seeking development consent for the entire set of works. | |

| Para | NPS EN-5 Policy Requirement | Project Compliance |
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| ***2.9 Applicant assessment*** | | |
| ***Impacts*** | | |
| *Biodiversity and Geological Conservation* | | |
| 2.9.3 | Electricity networks infrastructure pose a particular potential risk to birdlife including large birds, such as swans and geese, and perching birds. These may collide with overhead lines and risk being electrocuted. Large birds may also be electrocuted when landing or taking off by completing an electric circuit between live and ground wires. Even perching birds can be killed as soon as their wings touch energised parts of the infrastructure. | **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** presents as assessment of the likely significant ornithological effects that could result from the Project. The assessment concludes that following the implementation of embedded mitigation measures and control and management measures set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, no residual significant effects are anticipated on ornithology.<br>Flight activity and potential risk of collision has been considered, and with no significant effects anticipated. The assessment of flight activity and potential risk of collision is supported by **Application Document 6.9.A3 Appendix 9.3 Flight Activity Assessment**. As set out in **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** and **Application Document 7.3 Register of Environmental Actions and Commitments** embedded and additional measures in line with the mitigation hierarchy have been incorporated into the Project design. This includes embedded measures such as the use of the Triple Araucaria design, which is characterised by 3 conductor wires in a bundle on each pylon arm. This makes the conductor bundles more visible than a single or double bundle design. Flexibility on conductor type is required at the River Ouse crossing between proposed pylons 4AF76 and 4AF80 as further work would be required during detailed design to confirm the conductor type for this section however optionality for a double wire bundle design at the River Ouse crossing is unlikely to make a material difference to collision risk or avoidance of the proposed overhead line by birds for the reasons set out in section 3 of **Application Document 6.9.A3 Appendix 9.3 Flight Activity Assessment**. Additional measures include installing bird diverters on the following sections of overhead line to minimise the potential risk of collision mortality for qualifying species of the Humber Estuary SSSI/Ramsar/SPA and the River Idle Washlands SSSI:<br>• Between pylons 4AF62 and 4AF70 adjacent to Broomfleet Tileworks;<br>• Between pylons 4AF77 and 4AF96 that cross the River Ouse; and<br>• Between pylons 4AF171 and 4AF180 between the River Idle and the Chesterfield Canal.<br>Potential flight activity risk has been assessed at foraging and commuting areas associated with designated sites as agreed with Natural England (such as rivers and green corridors) as set out in **Application Document 6.9.A3 Appendix 9.3 Flight Activity Assessment** and supported by robust baseline data gathered through bird survey work and detailed desk study set out in **Application Document 6.9.A2 Appendix 9.2 Ornithology Baseline Report**. |
| 2.9.4 | Applicants should consider measures to make lines more visible such as bird flappers and diverters which are covered in more detail in Sections 2.10.2 - 2.10.4. | |
| 2.9.5 | The applicant will need to consider whether the proposed line will cause such problems at any point along its length and take this into consideration in the preparation of the ES (see Section 4.3 of EN-1). | |
| 2.9.6 | Particular consideration should be given to feeding and hunting grounds, migration corridors and breeding grounds, where they are functionally linked to sites designated or allocated under the 'national site network' provisions of the Conservation of Habitats and Species Regulations and Conservation of Offshore Marine Habitats and Species Regulations. | |
| *Landscape and Visual Impacts* | | |
| 2.9.7 | While the government does not believe that the development of overhead lines is incompatible in principle with applicants' statutory duty under Schedule 9 to the Electricity Act 1989, to have regard to visual and landscape amenity and to reasonably mitigate possible impacts thereon, in practice new overhead lines can give rise to adverse landscape and visual impacts. | **Application Document 6.6 Environmental Statement Chapter 6 Landscape** concludes that following the implementation of embedded and additional mitigation measures set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, and **Application Document 7.8 Outline Landscape and Ecology Management Plan**, which will be secured by **Application Document 3.1 Draft Development Consent Order**, the Project would only result in significant effects on two landscape character types (LCTs), Flat Drained Farmland LCT (in Route Section C) and Regional LCT 4a: Unwooded Vales (Route Section E and F) as a result of the |
| 2.9.8 | These impacts depend on the type (for example, whether lines are supported by towers or monopole structures), scale, siting, and degree of screening of the lines, as well as the characteristics of the landscape and local environment through which they are routed. | |

| Para | NPS EN-5 Policy Requirement | Project Compliance |
|---|---|---|
| 2.9.9 | New substations, sealing end compounds (including terminal towers), and other above-ground installations that serve as connection, switching, and voltage transformation points on the electricity network may also give rise to adverse landscape and visual impacts. | proposed overhead line, due to maturing mitigation planting at Operation Year 15. Some significant effects are also anticipated on some LCTs during construction; however, these are temporary.<br>There would not be any significant adverse effects on any designated landscapes, which includes the Yorkshire Wolds Important Landscape Area. There would be no effects on any National Park, The Broads or National Landscape.<br>On 4 February 2026, Natural England issued notice of intention to 'make' the designation Order for the proposed Yorkshire Wolds Area of Outstanding Natural Beauty (AONB). The Draft Yorkshire Wolds AONB (Designation) Order 2026 (Natural England, 2026) identifies the areas to be designated. At its closest near Market Weighton, the area proposed for designation is approximately 11.4 km from the Limits of Deviation. At this distance, the special qualities and statutory purposes of the AONB would not be significantly affected by the Project and no further assessment has been undertaken.<br>As set out in **Application Document 6.6 Environmental Statement Chapter 6 Landscape**, embedded measures that are intrinsic to and built into the design of the Project have been incorporated to reduce and where possible avoid landscape and visual impacts as far as practicable. Whilst the Project will result in some significant adverse impacts during construction and operation, the landscape proposals have responded to the design of the Project throughout its development as set out in **Application Document 5.10 Design Approach Document**.<br>Overall, the substantial public benefits and need for the Project, as set out in section 5 of **Application Document 5.5 Planning Statement**, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives and carbon reduction commitments, are considered to clearly and demonstrably outweigh the limited and localised adverse impacts to the landscape set out in **Application Document 6.6 Environmental Statement Chapter 6 Landscape**. |
| 2.9.10 | Cumulative adverse landscape, seascape and visual impacts may arise where new overhead lines are required along with other related developments such as substations, wind farms, and/or other new sources of generation. | |
| 2.9.11 | Landscape and visual benefits may arise through the reconfiguration, rationalisation, or undergrounding of existing electricity network infrastructure. Though mitigation of the landscape and visual impacts arising from overhead lines and their associated infrastructure is usually possible, it may not always be so, and the impossibility of full mitigation in these cases does not countermand the need for overhead lines. | |
| 2.9.12 | However, in nationally designated landscapes (National Parks, The Broads and National Landscapes) even residual impacts may make an overhead line proposal unacceptable in planning terms (see paragraph 2.9.21 below for guidance on this case). | |
| 2.9.13 | Where possible, applicants should ensure that the principles detailed in paragraphs 2.9.16-2.9.19 below are embodied in the design of their proposed overhead line route and its associated infrastructure. Applicants should also offer proposals (for instance those detailed in Section 2.10 below) for additional mitigation. | |
| 2.9.14 | Where the nature or proposed route of an overhead line will likely result in particularly significant landscape and visual impacts, as would be assessed through seascape, landscape and visual impact assessment (SLVIA), the applicant should demonstrate that they have given due consideration to the costs and benefits of feasible alternatives to the overhead line. This could include, where appropriate re-routing, underground or subsea cables and the feasibility e.g. in cost, engineering or environmental terms of these. Applicants should note the policy position for nationally designated landscapes at paragraph 2.9.21 below. | **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered** includes an assessment of alternative development options considered as part of the application for development consent, setting out the environmental considerations in choosing a preferred option and route including landscape and visual impacts. |
| 2.9.15 | The ES should set out details of this consideration, including the applicant's rationale for eschewing feasible alternatives to the overhead line, and the mitigation cost-calculation methodology that this rationale may rely upon. | |
| 2.9.16 | The Holford Guidance (guidelines for the routing of new overhead lines) were originally set out in 1959. These guidelines, intended as a common-sense approach to overhead line route design, were reviewed and updated by the industry in the 1990s, and they should be embodied in the applicants' proposals for new overhead lines. | **Application Document 5.10 Design Approach Document**, **Application Document 5.9 Design Development Report** and **Application Document 7.17 Strategic Options Report Including Needs Case** set out how the Holford guidance have been considered and embedded into the design of the Project. |
| 2.9.17 | In brief, the Holford Guidance state that applicants should:<br>• Avoid altogether, if possible, the major areas of highest amenity value, by so planning the general route of the line in the first place, even if total mileage is somewhat increased in consequence;<br>• Avoid smaller areas of high amenity value or scientific interest by deviation, provided this can be done without using too many angle towers, i.e. the bigger structures which are used when lines change direction; | As set out in **Application Document 5.10 Design Approach Document**, in applying the Holford guidance, the Project has sought to avoid, where reasonably practicable, areas of highest amenity value at the strategic routeing stage. Where avoidance was not possible due to network, environmental or technical constraints, alignment refinement has been undertaken to reduce, where possible, landscape and visual effects through careful siting.<br>Consistent with the Holford guidance and National Grid's established good practice, the Project has, where appropriate, sought to maximise opportunities for close parallel routeing with existing |

| Para | NPS EN-5 Policy Requirement | Project Compliance |
|---|---|---|
| | • Other things being equal, choose the most direct line, with no sharp changes of direction and thus with fewer angle towers;<br>• Choose tree and hill backgrounds in preference to sky backgrounds wherever possible. When a line has to cross a ridge, secure this opaque background as long as possible, cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees;<br>• Prefer moderately open valleys with medium or moderate levels of tree cover where the apparent height of towers will be reduced, and views of the line will be broken by trees;<br>• Where country is flat and sparsely planted, and unless specifically preferred otherwise by relevant stakeholders, keep the high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration of lines or 'wirescape'; and<br>• Approach urban areas through industrial zones, where they exist; and when pleasant residential and recreational land intervenes between the approach line and the substation, carefully assess the comparative costs of undergrounding. | overhead lines. This approach reduced the geographic spread of infrastructure and limited the introduction of new transmission corridors across the landscape.<br>Decisions on the extent of close paralleling balanced potential environmental benefits with engineering, safety and operational requirements, including access for construction and operation (including maintenance). The defined alignment reflects that balanced judgement. Further detail is provided within **Application Document 5.9 Design Development Report**.<br>A line swap over has been utilised at Brantingham Dale, to the northwest of Dale Road to allow more of the new overhead line to be routed in close parallel to the existing 4ZQ overhead line, where the two lines descend the scarp slope from the Wolds. Despite the resultant removal of a strip of plantation woodland at Bilks Hill it was considered that this close parallel alignment would help reduce the scale of landscape impacts in this sensitive section of the Yorkshire Wolds Important Landscape Area. This line swap over also enables the preferred alignment to be routed to the south of Ellerker and avoids the need for overhead lines both north and south of the village in accordance with feedback received during non-statutory consultation. The proposals rationalise the spatial arrangement, support close parallel alignment while maintaining network resilience and constructability, and reduce the cumulative effect of multiple lines. |
| 2.9.18 | The Horlock Rules (guidelines for the design and siting of substations) were established by National Grid in 2009 in pursuance of its duties under Schedule 9 to the Electricity Act 1989. These principles should be embodied in applicants' proposals for the infrastructure associated with new overhead lines. | Where constraints intersect, professional judgement has been exercised through a design review process to achieve an appropriate balance between landscape protection, technical feasibility, operational efficiency and statutory obligations.<br>The application of the Holford guidance supported the identification of a coherent and logical alignment that responded to the environment while remaining technically feasible and operationally robust.<br>The Project does not include any substations therefore the consideration of the Horlock Rules is not relevant. Separate planning applications for the 400 kV Birkhill Wood Substation (25/01898/STPLF), and 400 kV High Marnham Substation (25/01302/FUL) were submitted by National Grid in July and November 2025 to the local planning authorities of East Riding of Yorkshire Council and Bassetlaw District Council, respectively. The planning applications have subsequently been approved in 2026. |
| 2.9.20 | NESO will consult on and publish Electricity Transmission Design Principles (ETDP), which will apply to onshore and offshore electricity transmission infrastructure. The ETDP will provide guidance on transmission technology choices available to mitigate the impact of transmission infrastructure on the landscape, environment and communities whilst embedding innovation into design. Once the ETDP is published, developers should have regard to the ETDP as relevant, in addition to the Holford and Horlock rules. | It is acknowledged that NESO published the Electricity Transmission Design Principles (ETDP) in June 2026. While it is too late to have considered these in the Project's design approach and development from inception, National Grid has reviewed these principles and concludes that the Project's design approach, set out in **Application Document 5.10 Design Approach Document**, aligns with the principles in the ETDP, where relevant. |
| *Undergrounding and subsea cables* | | |
| 2.9.21 | Although it is the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, The Broads, or National Landscape). | |
| 2.9.22 | In these areas, and where harm to the landscape, visual amenity and natural beauty (including their special qualities and key characteristics) of these areas cannot feasibly be avoided by rerouting overhead lines, the strong starting presumption will be that the applicant should underground the relevant section of the line. | |
| 2.9.23 | However, undergrounding will not be required where it is infeasible in engineering terms, or where the harm that it causes (see paragraph 2.11.4) is not outweighed by its corresponding landscape, visual amenity and natural beauty benefits. Regardless of the option, the scheme through its design, delivery, and operation, should seek to further the statutory purposes of the designated landscape. These enhancements may go beyond the mitigation measures needed to minimise the adverse effects of the scheme. | |

| Para | NPS EN-5 Policy Requirement | Project Compliance |
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| 2.9.24 | Additionally, cases will arise where, though no part of the proposed development crosses a designated landscape, a high potential for widespread and significant adverse landscape and/or visual impacts along certain sections of its route may result in recommendations to use undergrounding for relevant segments of the line or alternatively consideration of using a route including subsea cabling. | The Project does not cross any part of a currently nationally designated landscape. The Project would not have any significant adverse effects on any designated landscapes, which includes the Yorkshire Wolds Important Landscape Area. There would be no effects on any National Park, The Broads or National Landscape as a result of the Project.<br>Although the Yorkshire Wolds Important Landscape Area is not currently nationally designated, on 4 February 2026 Natural England issued notice of intention to 'make' the designation Order for the proposed Yorkshire Wolds Area of Outstanding Natural Beauty. The Draft Yorkshire Wolds AONB (Designation) Order 2026 (Natural England, 2026) identifies the areas to be designated. At its closest point, near Market Weighton, the area proposed for designation is approximately 11.4 km from the Limits of Deviation of the Project. This means, at this distance, the special qualities and statutory purposes of the proposed AONB would not be significantly affected by the Project and no further assessment has been undertaken, in agreement with Natural England.<br>An assessment of impacts on the Yorkshire Wolds Important Landscape Area, as it currently stands, concludes that there would be no significant adverse effects on it as a result of the construction, operation and maintenance of the Project.<br>At an early stage of design development, a preliminary assumption was made to underground a section of the existing 400 kV ZDA overhead line between Ealand and west of Keadby to facilitate the crossing of the proposed new overhead line. As set out in **Application Document 5.9 Design Development Report**, a detailed appraisal of alternative crossing solutions was subsequently undertaken, including both underground and overhead options, having regard to the technical feasibility, environmental and socio-economic effects, cost and programme considerations. This process identified an overhead 'diamond duck under' crossing as the preferred solution, as it utilises and modifies existing infrastructure, reduces land take and construction complexity. It also avoids the greater environmental effects, carbon intensity and costs associated with undergrounding high-voltage transmission circuits. Having regard to NPS EN-5 and National Grid's statutory duties, this approach was considered to represent the most appropriate and proportionate solution, and undergrounding was not taken forward in this location.<br>Given the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, and that the Project does not cross part of a nationally designated landscape, or have high potential for widespread and significant adverse landscape or visual impacts along the route, undergrounding was not considered feasible. |
| 2.9.25 | In these cases, and taking account of the fact that the government has not laid down any further rule on the circumstances requiring use of underground or subsea cables, the Secretary of State must weigh the feasibility, cost, and any harm of the undergrounding or subsea option against:<br>• The adverse implications of the overhead line proposal;<br>• The cost and feasibility of re-routing overhead lines or mitigation proposals for the relevant line section; and<br>• The cost and feasibility of the reconfiguration, rationalisation, and/or use of underground or subsea cabling of proximate existing or proposed electricity networks infrastructure. | |
| 2.9.26 | In such cases the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if they are satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents, the mitigation hierarchy has been followed, and that any technical obstacles associated with it are surmountable. In this context it should consider:<br>• The landscape and visual baseline characteristics of the setting of the proposed route, in particular, the impact on high sensitivity visual receptors (as defined in the current edition of the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment), residential areas, designated landscapes, valued landscapes, designated heritage assets and Heritage Coasts (including, where relevant, impacts on the setting of designated features and areas), noting the policy in EN-1 paragraphs 5.4.13 – 5.4.14 on regional and local designations;<br>• The additional cost of the proposed underground or sub-sea alternatives, including their significantly higher lifetime cost of repair and later uprating;<br>• The potentially very disruptive effects of undergrounding on local communities, habitats, archaeological and heritage assets, marine environments, soil (including peat soils), hydrology, geology, and, for a substantial time after construction, landscape and visual amenity. (Undergrounding an overhead line will mean digging a trench along the length of the route, and so such works will often be more disruptive – albeit temporarily – to the receptors listed above than would an overhead line of equivalent rating);<br>• The potentially very disruptive effects of subsea cables on the seabed and the species that live in and on it, including physical damage to and full loss of seabed habitats. Cable protection can also be required where cables cross each other, or where they cannot be buried deep enough to protect them from becoming exposed. Such protection causes additional impacts that are often greater than those of the cable itself due to the large areas covered. There can also be issues where subsea cables make landfall, as much coastal land is protected habitat with environmental and heritage designations and landfall connections could cause additional disruption to coastal communities and the environment;<br>• The applicant's commitment, as set out in their ES, to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils (including peat soils), particularly regarding Best and Most Versatile land, including development | |

| Para | NPS EN-5 Policy Requirement | Project Compliance |
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| | and implementation of a Soil Resources and Management Plan. Such a commitment must guarantee appropriate handling of soil, backfilling, and return of the land to the baseline Agricultural Land Classification (ALC), thus ensuring no loss or degradation of agricultural land. Such a commitment should be based on soil and ALC surveys in line with the 1988 ALC criteria and due consideration of the Defra Construction Code of Practice for Sustainable Use of Soils on Construction Sites. | |
| *Noise and Vibration* | | |
| 2.9.27 | All high voltage transmission lines have the potential to generate noise under certain conditions. | As set out in **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** a 'triple Araucaria' conductor is proposed for the majority of the route. The triple Araucaria conductor system is low noise, and therefore significant adverse effects from operational noise are not expected. There are two locations where triple Araucaria is not proposed or cannot be committed to at this stage due to potential operational constraints:<br>• The River Ouse between proposed pylons 4AF76 and 4AF80; and<br>• The realignment of the existing ZDA route between Ealand and west of Keadby (between existing pylons ZDA116 and ZDA123).<br>As a conductor type has not been fixed for the River Ouse crossing, the assessment has been based on the worst-case likely conductor with regards to noise, namely 'twin Warwick'.<br>In terms of the River Ouse crossing, potential adverse effects are only anticipated within approximately 52 m of the proposed overhead line centre line. The nearest noise sensitive receptor (NSR) is located approximately 80 m to the west of the proposed overhead line centre (between pylons 4AF79 and 4AF80 at Ousefleet) and as such significant adverse effects are not anticipated.<br>Taking account of potential flexibility within the LoD, the centre of the pylon could move 30 m either side of the centre line subject to topography and local conditions. At a worst-case at the extreme of the LoD, the nearest NSR would therefore be approximately 50 m from the centre line. This falls just within the distance for potential adverse effects, requiring a BS 4142 assessment. The assessment concludes that operational noise during dry conditions at the nearest NSR during daytime and night-time periods is negligible to low. For wet conditions the change in ambient level is approximately 1 dB during daytime and night-time periods, which, even considering the worst-case potential conductor type, does not result in a significant effect. |
| 2.9.28 | Line noise is most commonly caused by corona noise when the conductor surface electric stress exceeds the inception level for corona discharge activity which is released as acoustic energy and radiates into the air as sound. Transmission line conductors are normally designed to operate below this threshold. | The assessment recognises corona discharge as the principal source of audible noise from overhead lines. The characteristics and causes of corona noise, and the low-noise performance of the proposed conductor systems, are described in section 16.4 of **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** and **Application Document 6.16.A5 Environmental Statement Appendix 16.5 Operational Overhead Line Noise Assessment**. The Project would use 'triple Araucaria' conductors along the majority of the route; this is National Grid's least electrically stressed conductor system and is designed to reduce corona discharge and associated operational noise. |
| 2.9.29 | Surface contamination on a conductor or accidental damage during transport or installation can cause local enhancement of electric stress and initiate discharge activity leading to the generation of additional noise. | The assessment recognises corona discharge as the principal source of audible noise from overhead lines. The characteristics and causes of corona noise, and the low-noise performance of the proposed conductor systems, are described in section 16.4 of **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** and **Application Document 6.16.A5 Environmental Statement Appendix 16.5 Operational Overhead Line Noise Assessment**. The Project would use 'triple Araucaria' conductors along the majority of the route; this is National Grid's least electrically stressed conductor system and is designed to reduce corona discharge and associated operational noise. |

| Para | NPS EN-5 Policy Requirement | Project Compliance |
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| 2.9.30 | The highest noise levels generated by a line generally occur during rain. | The operational noise assessment explicitly considers wet-weather conditions as the reasonable worst-case for overhead line noise. Predicted wet-weather noise levels and their effects at NSRs are presented in section 16.9 of **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** and **Application Document 6.16.A5 Environmental Statement Appendix 16.5 Operational Overhead Line Noise Assessment**. |
| 2.9.31 | Water droplets may collect on the surface of the conductor and initiate corona discharges with noise levels being dependent on the level of rainfall. Fog may also give rise to increased noise levels, although these levels are lower than those during rain. | The assessment methodology accounts for noise generated during wet weather and considers how overhead line noise varies with rainfall conditions. Wet-weather noise is assessed using the methodology described in section 16.4 of **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** and **Application Document 6.16.A5 Environmental Statement Appendix 16.5 Operational Overhead Line Noise Assessment**. Fog is not assessed separately because the associated overhead line noise levels are lower than those during rain and are therefore bounded by the wet-weather assessment. |
| 2.9.32 | After a prolonged spell of dry weather without rain to wash the conductors, contamination may accumulate at sufficient levels to result in increased noise. After heavy rain, these discharge sources are washed away and the line will resume normal quieter operating sound. | The assessment considers both dry- and wet-weather operational noise, including dry noise associated with localised surface contamination. The assessment therefore addresses the potential noise consequence of conductor surface contamination, rather than relying on rainfall to remove it.<br>The tiered methodology described in section 16.4 of **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** and **Application Document 6.16.A5 Environmental Statement Appendix 16.5 Operational Overhead Line Noise Assessment** assesses dry noise separately. |
| 2.9.33 | Surface grease on conductors can also give rise to audible noise effects as grease is able to move slowly under the influence of an electric field, tending to form points which then initiate discharge activity. Surface grease is likely to occur along the entire length of a conductor. Hence there may be many potential discharge sources and, consequently, a higher noise level. | Paragraph 2.10.9 of NPS EN-5 requires consideration of quality assurance and conductor cleanliness during manufacture, transportation and installation. These matters would therefore be considered through the Project's detailed design, procurement and installation arrangements in line with standard National Grid processes. |
| 2.9.34 | This will only occur if substandard grease has been used during manufacture or if the conductor has been overheated by carrying excessive electrical load. This can be mitigated through good design or by replacement. | Paragraph 2.10.9 of NPS EN-5 requires consideration of quality assurance during manufacture. This matter would therefore be considered through the Project's detailed design and procurement arrangements in line with standard National Grid processes. |
| 2.9.35 | Transmission line audible noise is generally categorised as 'crackle' or 'hum', according to its tonal content. | The assessment considers the acoustic character of overhead line noise, including crackle and tonal hum. These characteristics are described in section 16.4 of **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** and are accounted for in the tiered assessment methodology, including the application of penalties for acoustic character. Further detail is provided in **Application Document 6.16.A5 Environmental Statement Appendix 16.5 Operational Overhead Line Noise Assessment**. |
| 2.9.36 | Crackle may occur alone, but hum will usually occur only in conjunction with crackle. Crackle is a sound containing a random mixture of frequencies over a wide range, typically 1kHz to 10kHz. No individual pure tone can be identified for any significant duration. Crackle has a generally similar spectral content to the sound of rainfall. Hum is only likely to occur during rain when rates of rainfall exceed 1mm/hr. Hum is a sound consisting of a single pure tone or tones. | The distinction between crackle and hum, their frequency characteristics and their occurrence under different weather conditions are incorporated into the operational noise assessment. Wet- and dry-weather noise are assessed separately, and tonal characteristics are considered. The assessment also considers the limited occurrence of rainfall rates associated with hum when evaluating context. Further detail is provided in section 16.9 of **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** and **Application Document 6.16.A5 Environmental Statement Appendix 16.5 Operational Overhead Line Noise Assessment**. |
| 2.9.37 | Noise may also arise from discharges on overhead line fittings such as spacers, insulators and clamps. Such noise should be mitigated through good design. | Potential noise from overhead line fittings is addressed through design and procurement controls. Fittings such as insulators, dampers, spacers and clamps would be designed and procured in accordance with National Grid Technical Specifications and would be type registered to confirm conformity with the relevant specification. These measures reduce the potential for audible noise and tones from overhead line fittings and are set out in section 16.8 of **Application Document 6.16** |

| Para | NPS EN-5 Policy Requirement | Project Compliance |
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| | | **Environmental Statement Chapter 16 Noise and Vibration** and **Application Document 7.3 Register of Environmental Actions and Commitments**. |
| 2.9.38 | Audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors. | No substations are proposed as part of the Project and therefore noise impacts from such equipment have not been considered as part of the assessment. |
| 2.9.39 | Transformers are installed at many substations, and generate low frequency hum. Whether the noise can be heard outside a substation depends on a number of factors, including transformer type and the level of noise attenuation present (either engineered intentionally or provided by other structures). | |
| 2.9.41 | For the assessment of noise from overhead lines, the applicant must use an appropriate method to determine the sound level produced by the line in both dry and wet weather conditions, in addition to assessing the impact on noise-sensitive receptors. | **Application Document 6.16.A5 Environmental Statement Appendix 16.5 Operational Overhead Line Noise Assessment** includes an assessment of the overhead lines during the operational phase. The assessment uses an appropriate methodology (National Grid Technical Guidance Note TGN(E)322) to determine the sound level produced by the line in both dry and wet weather conditions.<br>**Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** sets out that the assessment concludes that operational noise during dry conditions at the nearest NSR during daytime and night-time periods is negligible to low. For wet conditions the change in ambient level is approximately 1 dB during daytime and night-time periods, which, even considering the worst-case potential conductor type, does not result in a significant effect. |
| 2.9.42 | For instance, the applicant may use an appropriate noise modelling tool or tools for the prediction of overhead line noise and its propagation over distance, such as an ISO 9613-2 or Technical Report TR(T)94. | |
| 2.9.43 | When assessing the impact of noise generated by overhead lines in wet weather relative to existing background sound levels, the applicant should consider the effect of varying background sound levels due to rainfall. | |
| 2.9.44 | The Secretary of State is likely to regard it as acceptable for the applicant to use a methodology that demonstrably addresses these criteria. | |
| *Electric and Magnetic Fields (EMFs)* | | |
| 2.9.47 | All overhead power lines produce EMFs. These tend to be highest directly under a line and decrease to the sides at increasing distance. Although putting cables underground eliminates the electric field, they still produce magnetic fields, which are highest directly above the cable. EMFs can have both direct and indirect effects on human health, aquatic and terrestrial organisms. | **Application Document 7.11 Electric and Magnetic Field Compliance Report** demonstrates that the Project is compliant with the International Commission on Non-Ionizing Radiation Protection Guidelines (ICNIRP) (1998) in ensuring that the threshold for impacts to humans is not met/exceeded. National Grid will ensure that policies and procedures are in place at the design phase to ensure that all equipment complies with public EMF exposure limits. Therefore, as outlined in **Application Document 6.5.A1 Environmental Statement Appendix 5.1 Environmental Impact Assessment Scoping Report**, EMFs are scoped out of the health and wellbeing assessment. |
| Sulphur Hexafluoride | | |
| 2.9.62 | Applicants should at the design phase of the process consider carefully whether the proposed development could be reconceived to avoid the use of SF6-reliant assets. | The Project, being a proposed overhead line, does not include sulphur hexafluoride. Sulphur hexafluoride is primarily used in substations. |
| **2.10 Mitigation** | | |
| *Landscape and Visual* | | |
| 2.10.5 | In addition to good design in accordance with the Holford and Horlock rules (please see paragraphs 2.9.16 - 2.9.19) and the ETDP once published (paragraph 2.9.20), and the consideration of undergrounding or rerouting the line where possible, the principal opportunities for mitigating adverse landscape and visual impacts of electricity networks infrastructure are:<br>• Consideration of network reinforcement options (where alternatives exist) which may allow improvements and/or extensions to an existing line rather than the building of an entirely new line; | **Application Document 5.10 Design Approach Document** sets out how the Holford guidance have been considered in the design of the Project.<br>As set out in **Application Document 6.6 Environmental Statement Chapter 6 Landscape**, embedded measures that are intrinsic to and built into the design of the Project have been incorporated to reduce and where possible avoid landscape and visual impacts as far as practicable. These include:<br>• Section 5.4 of **Application Document 7.12 Strategic Options Report Including Needs Case** outlines how National Grid have developed the strategic proposal and the approach applied to evaluate options. This includes firstly identifying if the existing network could modified or |

| Para | NPS EN-5 Policy Requirement | Project Compliance |
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| | • Selection of the most suitable type and design of support structure in order to minimise the overall visual impact on the landscape. In particular, ensuring that towers are of the smallest possible footprint and internal volume; and<br>• The rationalisation, reconfiguration, and/or undergrounding of existing electricity networks infrastructure in the vicinity of the proposed development.. | enhanced to deliver the required connection or increase in capacity. For the Project it was identified there was a need beyond the capability of the existing network as set out in the Needs Case.<br>• Where possible the Project has been designed to be parallel or close parallel with the existing overhead lines to reduce the spread of effects from overhead lines in the landscape. Route Sections where close parallel has been possible, taking into account constraints present along the existing overhead lines as well as technical complexity, include Route Section A which in turn minimises the effects on the Yorkshire Wolds Important Landscape Area, Route Section B between the River Ouse and Luddington, and Route Section D to the south of Beltoft which minimises the effects on the Isle of Axholme Area of Special Historic Landscape Interest.<br>• Where possible and where the Project is not close parallel, the Project has been designed to avoid existing vegetation in order to avoid removing visual buffers. Examples include routeing between the larger woodland blocks either side of the M180 in Route Section D and using existing field entrances for access to avoid unnecessary removal of mature hedgerows and trees throughout the length of the Project.<br>Additional mitigation measures have also been identified to further reduce significant effects on landscape and visual receptors, and include additional scrub, tree, hedgerow and woodland planting to mitigate losses and increase connectivity as set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** which is secured by **Application Document 3.1 Draft Development Consent Order**.<br>Control and management measures to mitigate the impacts of construction on the landscape and visual receptors will be carried out in accordance with **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**. |
| 2.10.6 | Additionally, there are more specific measures that might be taken, and which the Secretary of State could mandate through DCO requirements if appropriate, as follows:<br>• Landscaping schemes, comprising off-site tree and hedgerow planting, are sometimes used for larger new overhead line projects to mitigate potential landscape and visual impacts, softening the effect of a new above ground line whilst providing some screening from important visual receptors. These may be implemented with the agreement of the relevant landowner(s), or the developer may compulsorily acquire the land or land rights in question. Advice from the relevant statutory authority should be sought on the design of such schemes, with particular consideration given to the selection of species mix which is appropriate to the local landscape character; and<br>• Screening, comprising localised planting in the immediate vicinity of residential properties and principal viewpoints can also help to screen or soften the effect of the line, reducing the visual impact from a particular receptor. | **Application Document 7.8 Outline Landscape and Ecology Management Plan** sets out the proposed landscaping and mitigation including retention, replacement planting and on-site habitat creation within the Order Limits to reduce and avoid landscape and visual impacts, and will be secured by **Application Document 3.1 Draft Development Consent Order**.<br>In line with **Application Document 7.1 Biodiversity Net Gain Report**, the **Application Document 7.8 Outline Landscape and Ecology Management Plan** excludes off-site BNG habitat requirements. It is anticipated that any off-site BNG, considered to be enhancement, would be delivered through alternative mechanisms outside of the main construction works. The added environmental and societal value will be reported through the final iteration of the BNG Report post-consent based on final detailed design and an updated metric in accordance with **Application 3.1 Draft Development Consent Order**.<br>**Application Document 7.8 Outline Landscape and Ecology Management Plan** explains that trees planted as whips, and planted alongside some larger specimens, are expected to provide an effective visual screen by around year 15, subject to successful establishment and management. With typical growth rates and initial planting at standard sizes, vegetation is anticipated to reach sufficient density and canopy structure to substantially filter or fully screen lower-level elements of a development. While some limited seasonal or filtered visibility may remain in Winter, depending on species mix, the overall screening effect is expected to be robust and long-term.<br>**Application Document 7.8 Outline Landscape and Ecology Management Plan** sets out the landscaping proposals for the Project along with how they will be managed and monitored to secure the integrity and benefit of the landscaping proposals. |
| 2.10.7 | As set out in the paragraphs above, where landscaping schemes and/or screening mitigation of the kind described above is required, rights over the land necessary for such measures may be compulsorily acquired as part of the DCO. | |
| 2.10.8 | Furthermore, since long-term management of the selected mitigation schemes is essential to their mitigating function, a management plan, developed at least in outline at the conclusion of the examination, and which sets out proposals within a realistic timescale, should secure the integrity and benefit of these schemes. This should also uphold the landscape commitments made to achieve consent, alongside any pertinent commitments to environmental and biodiversity net gain. | |

| Para | NPS EN-5 Policy Requirement | Project Compliance |
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| *Noise and Vibration* | | |
| 2.10.9 | Applicants must consider the following measures:<br>• The positioning of lines to help mitigate noise;<br>• Ensuring that the appropriately sized conductor arrangement is used to minimise potential noise;<br>• Quality assurance through manufacturing and transportation to avoid damage to overhead line conductors which can increase potential noise effects;<br>• Ensuring that conductors are kept clean and free of surface contaminants during stringing/installation; and<br>• The selection of quieter cost-effective plants. | The route alignment has been designed, as far as practicable, to avoid noise sensitive receptors. This would include avoiding settlements and residential areas, passing predominantly through rural areas, with the majority of nearby receptors being isolated dwellings and small settlements.<br>The Project would include 'triple Araucaria' conductors which is the best design for reducing the effects of line crackle (corona discharge) and would reduce the generation of noise from the proposed overhead lines during operation. Quality assurance through manufacturing and transportation to avoid damage to overhead line, and ensuring that conductors are kept clean and free of surface contaminants during stringing and installation would be considered through the Project's detailed design, procurement and installation arrangements in line with standard National Grid processes.<br>**Application Document 7.7 Outline Noise and Vibration Management Plan** has been prepared which sets out measures to reduce and avoid noise and vibration impacts as far as practicable. It will be secured by **Application Document 3.1 Draft Development Consent Order**. |
| 2.10.10 | In addition, the ES should include information on planned maintenance arrangements. Where detail is not included, the Secretary of State should consider stipulating appropriate maintenance arrangements by way of requirements attached to any grant of development consent. | **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project** includes details on planned maintenance arrangements. It states that inspections will be carried out to identify where minor repairs or modifications are required to keep infrastructure working effectively.<br>Noise and vibration impacts from maintenance have been scoped out, with agreement of the Planning Inspectorate. |
| *Electric and Magnetic Fields (EMFs)* | | |
| 2.10.11 | The applicant should consider the following factors:<br>• Height, position, insulation and protection (electrical or mechanical as appropriate) measures subject to ensuring compliance with the Electricity Safety, Quality and Continuity Regulations 2002;<br>• That optimal phasing of high voltage overhead power lines is introduced wherever possible and practicable in accordance with the Code of Practice to minimise EMFs; and<br>• Any new advice emerging from the Department of Health and Social Care relating to government policy for EMF exposure guidelines. | **Application Document 7.11 Electric and Magnetic Field Compliance Report** demonstrates that the Project is compliant with the ICNIRP (1998) in ensuring that the threshold for impacts to humans is not met/exceeded. National Grid will ensure that policies and procedures are in place at the design phase to ensure that all equipment complies with public EMF exposure limits. Therefore, as outlined in **Application Document 6.5.A1 Environmental Statement Appendix 5.1 Environmental Impact Assessment Scoping Report**, EMFs are scoped out of the health and wellbeing assessment. |
| 2.10.12 | Where it can be shown that the line will comply with the current public exposure guidelines and the policy on phasing, no further mitigation should be necessary. | |
| 2.10.13 | Where EMF exposure is within the relevant public exposure guidelines, re-routeing a proposed overhead line purely on the basis of EMF exposure or undergrounding a line solely to further reduce the level of EMF exposure are unlikely to be proportionate mitigation measures. | |
| **2.11 Secretary of State decision making** | | |
| *Biodiversity and Geological conservation* | | |
| 2.11.1 | Where biodiversity impacts are identified, including those associated with bird collision with overhead lines, the Secretary of State should be satisfied that all feasible options for mitigation have been considered and evaluated appropriately. | **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** presents as assessment of the likely significant ornithological effects that could result from the Project. The assessment concludes that following the implementation of embedded mitigation measures and control and management measures set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, no residual significant effects are anticipated on ornithology. |

| Para | NPS EN-5 Policy Requirement | Project Compliance |
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| | | Flight activity and potential risk of collision has been considered, and with no significant effects anticipated. The assessment of flight activity and potential risk of collision is supported by **Application Document 6.9.A3 Appendix 9.3 Flight Activity Assessment**. As set out in **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** and **Application Document 7.3 Register of Environmental Actions and Commitments** embedded and additional measures in line with the mitigation hierarchy have been incorporated into the Project design. This includes embedded measures such as the use of the Triple Araucaria design, which is characterised by 3 conductor wires in a bundle on each pylon arm. This makes the conductor bundles more visible than a single or double bundle design. Flexibility on conductor type is required at the River Ouse crossing between proposed pylons 4AF76 and 4AF80 as further work would be required during detailed design to confirm the conductor type for this section however optionality for a double wire bundle design at the River Ouse crossing is unlikely to make a material difference to collision risk or avoidance of the proposed overhead line by birds for the reasons set out in section 3 of **Application Document 6.9.A3 Appendix 9.3 Flight Activity Assessment**. Additional measures include installing bird diverters on the following sections of overhead line to minimise the potential risk of collision mortality for qualifying species of the Humber Estuary SSSI/Ramsar/SPA and the River Idle Washlands SSSI:<br>• Between pylons 4AF62 and 4AF70 adjacent to Broomfleet Tileworks;<br>• Between pylons 4AF77 and 4AF96 that cross the River Ouse; and<br>• Between pylons 4AF171 and 4AF180 between the River Idle and the Chesterfield Canal.<br>Potential flight activity risk has been assessed at foraging and commuting areas associated with designated sites as agreed with Natural England (such as rivers and green corridors) as set out in **Application Document 6.9.A3 Appendix 9.3 Flight Activity Assessment** and supported by robust baseline data gathered through bird survey work and detailed desk study set out in **Application Document 6.9.A2 Appendix 9.2 Ornithology Baseline Report**. |
| *Landscape and Visual* | | |
| 2.11.2 | The Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with the Holford and Horlock Rules (please see paragraphs 2.9.16 - 2.9.19) or any updates to them and has had regard to the ETDP (please see paragraph 2.9.20) once published. | **Application Document 5.10 Design Approach Document** explains how the Project complies with the Holford guidance.<br>The Project does not include any substations therefore the consideration of the Horlock Rules is not relevant. Separate planning applications for the 400 kV Birkhill Wood Substation (25/01898/STPLF), and 400 kV High Marnham Substation (25/01302/FUL) were submitted by National Grid in July and November 2025 to the local planning authorities of East Riding of Yorkshire Council and Bassetlaw District Council, respectively. The planning applications have subsequently been approved in 2026.<br>It is acknowledged that NESO published the Electricity Transmission Design Principles (ETDP) in June 2026. While it is too late to have considered these in the Project's design approach and development from inception, National Grid has reviewed these principles and concludes that the Project's design approach, set out in **Application Document 5.10 Design Approach Document**, aligns with the principles in the ETDP, where relevant. |
| 2.11.3 | The Secretary of State should also be satisfied that all feasible options for mitigation, including the rationalisation, reconfiguration, or undergrounding of existing electricity networks infrastructure, have been considered and evaluated appropriately. | The Project has been designed following the mitigation hierarchy. At the routeing and siting stage, the Project design process was informed by the Holford guidance to avoid impacts where possible. The design approach has included the consideration and appraisal of reasonable alternatives, informed by environmental, technical, socio-economic and cost factors, and guided by established routeing principles. This process culminated in the identification of a preferred alignment which seeks, where practicable, to minimise environmental and community effects, including through the use of close parallel routeing with existing overhead lines where this represents the most appropriate balance of considerations. The design has evolved through ongoing engagement and consultation, including both non-statutory and statutory stages, alongside further studies and assessments, to inform refinements to routeing, siting, access arrangements and construction |
| 2.11.4 | In circumstances where it can be demonstrated that a mitigation measure and/or technological approach is appropriate and/or necessary for a project, including to limit landscape and visual impact as set out above, the Secretary of State should take this into account in decision making. | |

| Para | NPS EN-5 Policy Requirement | Project Compliance |
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| | | methodology, and embedded and additional mitigation measures. The design process is evidenced in **Application Document 7.17 Strategic Options Report Including Needs Case**, **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** and **Application Document 7.19 Supplementary Corridor and Routeing Report**, and **Application Document 5.9 Design Development Report**.<br>Embedded, control and additional mitigation measures that the Project has committed to are set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**, which will be secured by **Application Document 3.1 Draft Development Consent Order**. |
| 2.11.5 | Nationally designated landscapes have specific statutory purposes. The Secretary of State should have special regard to nationally designated landscapes, where the general presumption in favour of overhead lines should be reversed to favour undergrounding. In addition, the Secretary of State must seek to further the purpose(s) of designated landscapes when making decisions which effect land within the designated area. EN-1 (Section 5.10) and paragraphs 2.9.7 to 2.9.26 above have further guidance on this requirement. | **Application Document 6.6 Environmental Statement Chapter 6 Landscape** concludes that there would not be any significant adverse effects on any designated landscapes, which includes the Yorkshire Wolds Important Landscape Area. There would be no effects on any National Park, The Broads or National Landscape.<br>On 4 February 2026, Natural England issued notice of intention to 'make' the designation Order for the proposed Yorkshire Wolds AONB. The Draft Yorkshire Wolds AONB (Designation) Order 2026 identifies the areas to be designated. At its closest near Market Weighton, the area proposed for designation is approximately 11.4 km from the LoD. At this distance, the special qualities and statutory purposes of the AONB would not be significantly affected by the Project and no further assessment has been undertaken. |
| 2.11.6 | Away from designated landscapes and in locations where there is a high potential for widespread and significant adverse landscape and/or visual impacts, the Secretary of State should be satisfied that the applicant has provided evidence to support a decision on whether undergrounding is or is not appropriate, having considered this on a case-by-case basis, weighing the considerations in paragraph 2.9.25 above. | For information on how reconfiguration, rationalisation and undergrounding have been considered refer to **Application Document 7.17 Strategic Options Report Including Needs Case** and **Application Document 5.9 Design Development Report**. An overhead line was identified as being the preferred strategic option and information is presented in **Application Document 7.17 Strategic Options Report Including Needs Case**. |
| *Noise and Vibration* | | |
| 2.11.7 | The Secretary of State should ensure that appropriate assessment methodologies have been used in the evidence presented to it, and that the appropriate mitigation options have been considered and adopted. Where the applicant can demonstrate that appropriate mitigation measures will be put in place, the residual noise impacts are unlikely to be significant. | The Project has been designed as far as possible, following the mitigation hierarchy in order to avoid or reduce impacts from noise and vibration. Measures relevant to the control and management of impacts during construction of the Project are included in **Application Document 7.2 Outline Code of Construction Practice**, **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.7 Outline Noise and Vibration Management Plan**. |
| 2.11.8 | Consequently, noise from overhead lines is unlikely to lead to the Secretary of State refusing an application, but it may need to consider the use of appropriate requirements in the DCO to ensure noise is minimised as far as is practicable. | **Application Document 7.7 Outline Noise and Vibration Management Plan** has been prepared which sets out measures to reduce and avoid noise and vibration impacts as far as practicable. It will be secured by **Application Document 3.1 Draft Development Consent Order**. |
| ***Critical National Priority*** | | |
| 2.12.7 | As highlighted in EN-1 government has concluded that there is a CNP for the provision of nationally significant low carbon infrastructure. This includes for electricity network infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System. This includes infrastructure identified in the HND and subsequent strategic network design exercises, see Section 2.13 below. | The Project is identified as a National Significant Infrastructure Project (in accordance with Part 3, section 14(1)(b) and section 16(1)(a) of the Planning Act 2008). The Project is CNP infrastructure being electricity grid infrastructure including network reinforcements and upgrade works, within the scope of CNP as set out in paragraph 4.2.17 of NPS EN-1. |

## 2.3 East Inshore Marine Plan

Table 2.3 – Signposting for Compliance with the East Inshore Marine Plan

| Policy | East Inshore Marine Plan Policy Requirement | Project Compliance |
|---|---|---|
| **Chapter 1: Background and Overview** | | |
| Paragraph 19 | The East Inshore Marine Plan Area includes the area of sea stretching from Flamborough Head to Felixstowe, and extends out to the seaward limit of the territorial sea (approximately 12 nautical miles). It also includes<br>• any area submerged at mean high water spring tide<br>• the waters of any estuary, river or channel, so far as the tide flows at mean high water spring tide and<br>• waters in any area which is closed (permanently or intermittently) by a lock or other artificial means against the regular action of the tide, but into and from which seawater is caused or permitted to flow (continuously or from time to time)<br>In some areas there are existing plans or measures already in place that marine planning may complement or support. In practice for some areas, eg in inland tidal waterways, existing plans and measures will be such that marine planning will have little or nothing to add to that established by other existing plans. | As the Project crosses the tidal River Ouse between Yokefleet and Blacktoft / Ousefleet, it falls within the inland tidal extent of the East Inshore Marine Plan Area, where the river is subject to tidal flow at MHWS.<br>National Grid has engaged with the Marine Management Organisation (MMO) as set out in **Application Document 5.1 Consultation Report**. As confirmed with the MMO, there are no Project components, permanent structures, or construction working areas located below Mean High Water Springs (MHWS). Conductor stringing across the tidal River Ouse will be carried out using aerial methods (drones or helicopters), thereby avoiding riverside working compounds and minimising the use of vessels within the tidal river channel and eliminating the requirement for a Marine Licence under the Marine and Coastal Access Act 2009.<br>In accordance with the Plan's recognition that existing terrestrial consenting mechanisms and statutory frameworks regulate inland tidal reaches effectively, the environmental effects of the crossing are comprehensively addressed through the Planning Act 2008 Development Consent Order (DCO) process and accompanying Environmental Statement. These include **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**, **Application Document 7.12 Water Framework Directive Assessment**, and **Application Document 7.13 Flood Risk Assessment**, alongside protective controls secured via the **Application Document 7.2 Outline Code of Construction Practice** and the **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>The Project complements the existing statutory controls for inland tidal waters, avoids activities requiring marine licensing, and accords with the operational scope and intent of the East Inshore Marine Plan. |
| Paragraph 24 | The Humber estuary, located in the north of the East Inshore Marine Plan area, hosts the United Kingdom's busiest port cluster, (in 2011), Grimsby and Immingham, handling 12% of the United Kingdom's traffic, with up to 40,000 ship movements per year. There is a complex mix of industrial, commercial, agricultural and residential uses. The Humber receives large inputs of suspended sediment from the North Sea, the Holderness Coast and from the rivers flowing into the estuary. This material is critical to many of the designated habitats within the estuary such as mudflats and saltmarsh. | Siting and design of the Project have been developed to avoid interference with the Humber Estuary's busy commercial navigation, port activities, and delicate coastal and estuarine sediment processes. While the Project spans the tidal River Ouse upstream of its confluence with the River Trent (Route Sections A and B), it does not involve any permanent or temporary infrastructure, dredging, or ground disturbance below Mean High Water Springs (MHWS). Pylons 4AF77 and 4AF78 are set back approximately 90 m from the water's edge, maintaining bank integrity and preventing physical interaction with the riverbed.<br>As set out in **Application Document 7.22 Navigational Risk Assessment** the works would require a formal watercourse closure of an approximately 200 m-long section of the River Ouse to suspend navigation during conductor stringing, over multiple 6-hour daylight windows across an indicative 8 to 10-week period, with active closure limits extending ±80 m either side of the proposed overhead line. Advance communication would be provided through Local Notices to Mariners issued by ABP and through notices circulated across marine and recreational user channels, with operational windows coordinated with ABP. The closures would be confined to portions of daylight hours rather than full days, with the period in which closures could be experienced being short-term. Users would be able to plan passage around each defined window, supported by advance notices, Local Notices to Mariners and two safety boats, and the closures represent a delay to passage rather than a prevention of navigation.<br>Sediment dynamics, geomorphology, and designated estuarine habitats (including the Humber Estuary SAC, SPA, Ramsar site, and SSSI) are safeguarded. Because no works take place within the active tidal frame or intertidal zone, the Project will not disturb riverbed sediments, alter |

| Policy | East Inshore Marine Plan Policy Requirement | Project Compliance |
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| | | hydrodynamics, or interrupt natural sediment transport regimes that nourish downstream mudflats and saltmarshes. Terrestrial construction runoff is strictly managed via sustainable drainage (SuDS), silt mitigation, and pollution control commitments (GG16, GG17, W05) secured through the **Application 7.2 Outline Code of Construction Practice** and the **Application Document 7.3 Register of Environmental Actions and Commitments**, preventing sediment-laden discharges into tributary waters.<br>The Project preserves the navigational functions and physical estuarine processes of the Humber Estuary, fully according with this context. |
| **Chapter 3: Plan Policies** | | |
| ***Objective 1:***<br>***To promote the sustainable development of economically productive activities, taking account of spatial requirements of other activities of importance to the East marine plan areas.*** | | |
| Policy EC1 | Proposals that provide economic productivity benefits which are additional to Gross Value Added currently generated by existing activities should be supported. | Siting, design, and construction methodologies for the Project have been developed to ensure compatibility with existing commercial and navigational activities within tidal river corridors, specifically the River Ouse.<br>The Project is a nationally significant infrastructure reinforcement that delivers substantial national and regional socio-economic benefits, supporting an estimated 284 net jobs per annum during construction and contributing approximately £39.9 million to the national economy. |
| ***Objective 2:***<br>***To support activities that create employment at all skill levels, taking account of the spatial and other requirements of activities in the East marine plan areas.*** | | |
| Policy EC2 | Proposals that provide additional employment benefits should be supported, particularly where these benefits have the potential to meet employment needs in localities close to the marine plan areas. | As detailed in **Application Document 6.17 Environment Statement Chapter 17 Socio-economics**, the Project directly supports employment, providing an average of 284 net jobs per annum during the construction phase, of which 57 jobs per annum are expected to be taken up by local residents. In addition, construction will generate approximately £39.9 million for the national economy, with around £8 million retained locally within the 60-minute drive-time area.<br>By expanding transmission capacity between the North of England and the Midlands, the Project creates long-term legacy benefits that enable investment and supply chain growth in the offshore wind and clean energy industries. The Project complies with Policy EC2. |
| ***Objective 3:***<br>***To realise sustainably the potential of renewable energy, particularly offshore wind farms, which is likely to be the most significant transformational economic activity over the next 20 years in the East marine plan areas, helping to achieve the United Kingdom's energy security and carbon reduction objectives.*** | | |
| Policy EC3 | Proposals that will help the East marine plan areas to contribute to offshore wind energy generation should be supported. | The primary strategic objective of the Project is to reinforce the National Electricity Transmission System between the Humber and East Midlands, directly facilitating the connection and bulk power transmission of planned renewable low-carbon generation, particularly offshore wind farms connecting in the North Sea and East Coast grid regions, to major regional demand centres.<br>As established in the **Application 5.5 Planning Statement** and the **Application Document 7.17 Strategic Options Report**, achieving the UK government's target of up to 50 GW of offshore wind by 2030 and meeting the Clean Power 2030 mission requires an unprecedented expansion of onshore transmission network infrastructure. The existing transmission network in the Humber and East Midlands does not have sufficient boundary capacity to accommodate the anticipated scale of new offshore wind power flows. By establishing a new 400 kV connection of approximately 90 km, the Project removes a critical transmission bottleneck and enables offshore wind projects within the East marine plan areas to export power securely into the national network. The Project is recognised as Critical National Priority (CNP) infrastructure under NPS EN-1 (Paragraph 4.2.5 and 4.2.17). Paragraph 3.3.72 of NPS EN-1 specifically acknowledges that connecting targeted volumes of offshore wind capacity requires timely reinforcement of the onshore transmission network to |

| Policy | East Inshore Marine Plan Policy Requirement | Project Compliance |
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| | | accommodate increased power flows. Furthermore, as highlighted in **Application Document 5.11 Interrelationship Document**, the Project forms part of a planned, coordinated network reinforcement strategy aligned with strategic transmission initiatives (including the Holistic Network Design and Centralised Strategic Network Plan).<br>The Project is essential to unlocking the capacity of offshore wind energy generated within and adjacent to the East marine plan areas, thereby directly fulfilling and strongly according with Policy EC3 |
| ***Objective 4:***<br>***To reduce deprivation and support vibrant, sustainable communities through improving health and social well-being.*** | | |
| Policy SOC1 | Proposals that provide health and social well-being benefits including through maintaining, or enhancing, access to the coast and marine area should be supported. | The Project has been designed to avoid or reduce impacts on health, well-being, and recreational access through sensitive routeing and design development in accordance with the mitigation hierarchy.<br>The effects of the Project on health, well-being, recreation, and public access have been assessed in **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing** and **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics**. The assessment concludes that the Project will result in non-significant beneficial health and socio-economic effects from employment, income, education, and training opportunities for workers during construction, as well as enabling the connection of low-carbon renewable generation to support climate change mitigation and long-term well-being.<br>Regarding access to the coast and marine/riparian environment, the Project does not permanently close, sever, or restrict public access along coastal margins or tidal river corridors, including the River Ouse. As set out in **Application Document 7.6 Outline Public Rights of Way Management Plan** and the **Application Document 7.3 Register of Environmental Actions and Commitments**, public rights of way providing access to and along the river margins, including the Trans Pennine Trail (OUSEB01) and National Cycle Network Route 65, will be maintained throughout the construction phase. Where short-term temporary closures are required during specific activities such as overhead line stringing, appropriate temporary access arrangements, marshalled crossings, and safe, comparable diversions will be provided with advance signage to maintain recreational access and connectivity for users. Following construction, all affected areas will be fully reinstated to their previous condition.<br>No physical works or working areas are located below Mean High Water Springs (MHWS), and conductor stringing across the River Ouse will use helicopters or drones, ensuring no obstruction to navigation or water-based recreational access along the river corridor.<br>The Project maintains public access to tidal and coastal margins, avoids significant adverse effects on recreational amenity and social cohesion, and accords with Policy SOC1. |
| ***Objective 5:***<br>***To conserve heritage assets, nationally protected landscapes and ensure that decisions consider the seascape of the local area.*** | | |
| Policy SOC2 | Proposals that may affect heritage assets should demonstrate, in order of preference:<br>a) that they will not compromise or harm elements which contribute to the significance of the heritage asset<br>b) how, if there is compromise or harm to a heritage asset, this will be minimized<br>c) how, where compromise or harm to a heritage asset cannot be minimised it will be mitigated against or<br>d) the public benefits for proceeding with the proposal if it is not possible to minimise or mitigate compromise or harm to the heritage asset | Siting and routeing of the Project have adhered to the mitigation hierarchy from inception, applying the preferences set out in Policy SOC2 to avoid, minimise, and mitigate harm to cultural heritage assets and their settings:<br>• **Avoidance of direct harm:** The Project avoids all physical interaction with intertidal and marine archaeology, as there are no works or working areas located below Mean High Water Springs (MHWS). Conductor stringing across the tidal River Ouse will be carried out using airborne methods (drones or helicopters), thereby avoiding in-channel equipment and eliminating physical disturbance to riverbed sediments and submerged or intertidal assets. Terrestrial routeing has also been designed to avoid direct physical loss of designated heritage assets. |

| Policy | East Inshore Marine Plan Policy Requirement | Project Compliance |
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| | | • **Minimisation of setting impacts:** To minimise visual and setting change across the tidal River Ouse corridor, the proposed 400 kV overhead line has been aligned in close parallel with the existing 4ZQ 400 kV overhead line, containing infrastructure within an established transmission corridor rather than introducing new linear alignments into undeveloped vistas. Siting of the river crossing pylons (4AF77 and 4AF78) matches the profile and lattice form of existing towers, and sensitive riverside built heritage—including the Grade II listed Lighthouse on the south bank of the River Ouse (NHLE: 1346751), the scheduled Hall Garth moated site (NHLE: 1013190), and the Whitgift Hall group—has been comprehensively evaluated in **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage**.<br>• **Mitigation:** Where below-ground archaeological features may be disturbed by terrestrial construction (such as pylon foundations, access tracks, and compounds), harm is mitigated through a programme of archaeological trial trenching, excavation, and recording to preserve remains by record, alongside protocols for unexpected discoveries, as secured in the **Application Document 7.9 Outline Archaeological Written Scheme of Investigation** and **Application Document 7.10 Outline Cultural Heritage Management Plan**. Landscape and replacement planting to filter and soften views is secured under **Application Document 7.8 Outline Landscape and Ecology Management Plan** and Requirement 4 and Requirement 8 of the **Application Document 3.1 Draft Development Consent Order**.<br>• **Public Benefits:** There are no harms to heritage assets in the Marine Plan area which need to be addressed. However, as set out in the Heritage Statement of Harm in **Application Document 5.5 Planning Statement**, no substantial harm or total loss will occur to any designated heritage asset, with residual harm falling within the less than substantial harm spectrum. In accordance with NPS EN-1 (Section 5.9), the Critical National Priority need for essential electricity transmission infrastructure to support the transition to net zero and secure energy supply delivers substantial public benefits that outweigh the identified residual less than substantial harm.<br>The Project therefore accords with the structured hierarchy of Policy SOC2. |
| Policy SOC3 | Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference:<br>a) that they will not adversely impact the terrestrial and marine character of an area<br>b) how, if there are adverse impacts on the terrestrial and marine character of an area, they will minimise them<br>c) how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against<br>d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts | Siting, routeing, and design of the Project have adhered strictly to the mitigation hierarchy and the structured preferences set out in the policy, guided by National Policy Statement EN-1 (Section 5.10), NPS EN-5 (Section 2.9), and the Holford guidance:<br>• **Avoidance of direct adverse impacts on marine/estuarine character:** The Project avoids physical encroachment or infrastructure within the intertidal and marine environment, as all works and working areas are situated above Mean High Water Springs (MHWS). Pylons 4AF77 and 4AF78 crossing the tidal River Ouse are set back approximately 90 m from the water's edge. Conductor stringing across the tidal river channel will be carried out using aerial methods (drones or helicopters), thereby avoiding riverside working compounds, barges, or physical disturbance to the riverbed, banks, and foreshore.<br>• **Minimisation of adverse impacts:** Where the proposed overhead line traverses the estuarine and coastal margins of the River Ouse (Route Sections A and B), it is aligned in close parallel with the existing 4ZQ 400 kV overhead line. As detailed in **Application Document 5.10 Design Approach Document** and **Application Document 5.9 Design Development Report**, this approach consolidates high-voltage infrastructure within an established transmission corridor, minimising visual intrusion, avoiding the proliferation of overhead lines across open river vistas, and preventing the fragmentation of undeveloped coastal and river expanses. Standard lattice pylons are used to maintain consistency with the existing overhead line, and the river crossing towers match the profile and heights of existing crossing structures to limit skyline discordance.<br>• **Mitigation:** Landscape and visual impacts on surrounding character areas and receptors have been assessed in **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**. |

| Policy | East Inshore Marine Plan Policy Requirement | Project Compliance |
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| | | During construction, temporary working areas will be controlled and managed to reduce visual clutter and light spill pursuant to the **Application Document 7.2 Outline Code of Construction Practice** and commitment GG21 of the **Application Document 7.3 Register of Environmental Actions and Commitments**. Any temporarily disturbed agricultural or boundary land will be reinstated upon completion. Furthermore, bespoke landscape mitigation, including native tree and hedgerow planting to filter views of the river crossing infrastructure, is secured under **Application Document 7.8 Outline Landscape and Ecology Management Plan** (e.g., Refs 09 and 10 to the north of Pennyhill Cottages) and Requirements 4 and 8 of **Application Document 3.1 Draft Development Consent Order**.<br>• **Case for proceeding:** The Project is Critical National Priority (CNP) infrastructure essential to reinforcing the transmission network and delivering the Clean Power 2030 mission and net zero. In accordance with NPS EN-1 (Paragraph 4.2.28), the substantial urgent national need and public benefits of reinforcing the network to transfer renewable power clearly outweigh the limited, localised residual landscape and visual impacts that cannot be fully eliminated.<br>The Project therefore accords with the sequential criteria and objectives of the policy. |
| ***Objective 6:***<br>***To have a healthy, resilient and adaptable marine ecosystem in the East marine plan areas.*** | | |
| Policy ECO1 | Cumulative impacts affecting the ecosystem of the East marine plans and adjacent areas (marine, terrestrial) should be addressed in decision-making and plan implementation. | Cumulative ecological impacts across terrestrial, estuarine, and adjacent marine ecosystems have been assessed in accordance with NPS EN-1 (Section 4.1, 4.3, and 5.4) and Advice Note Seventeen.<br>The assessment of cumulative effects is reported in **Application Document 6.20 Environmental Statement Chapter 20 Intra-project Cumulative Effects** and **Application Document 6.21 Environmental Statement Chapter 21 Inter-project Cumulative Effects**, supported by the technical appraisals in **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, **Application Document 6.9 Environmental Statement Chapter 9 Ornithology**, and **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**.<br>Siting and design of the Project follow the mitigation hierarchy to avoid contributing to cumulative pressure on the estuarine ecosystem of the River Ouse and the wider Humber Estuary European Marine Sites (SAC, SPA, Ramsar, SSSI):<br>• The River Ouse crossing is sited upstream of the confluence with the River Trent to minimise the crossing span across designated estuarine habitats and avoids all physical infrastructure below Mean High Water Springs (MHWS).<br>• Conductor stringing across the tidal river channel will be carried out using aerial methods (drones or helicopters), minimising vessel movements, dredging, and channel disturbance that could otherwise combine cumulatively with commercial shipping or dredging activities.<br>• Pylon heights and alignments are matched in close parallel with the existing 4ZQ 400 kV overhead line to avoid creating a new, separate barrier to migratory bird movement or compounding collision mortality for SPA/Ramsar qualifying species. Site-specific bird diverters will also be installed on earth wires.<br>• Potential underwater noise and vibration effects on migratory fish in the River Ouse are controlled through commitment NV25 in **Application Document 7.3 Register of Environmental Actions and Commitments**, ensuring construction vibration does not create cumulative barriers to fish transit. |

| Policy | East Inshore Marine Plan Policy Requirement | Project Compliance |
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| | | Inter-project cumulative interactions with other major linear and energy developments in the region, including potential shared access, programme alignment, and coordinated environmental mitigation, have been evaluated and detailed in **Application Document 5.11 Interrelationship Document**. Standard construction runoff controls, silt management, and biosecurity measures secured via the **Application Document 7.2 Outline Code of Construction Practice** and the **REAC (Application Document 7.3)** prevent sediment or chemical inputs into watercourses that could cumulatively degrade downstream water quality. Furthermore, as confirmed in **Application Document 5.2 Habitats Regulations Assessment Report**, no adverse effect on site integrity will occur alone or in combination with other plans or projects.<br>Cumulative ecosystem effects have been assessed and mitigated, fully according with Policy ECO1 |
| Policy ECO2 | The risk of release of hazardous substances as a secondary effect due to any increased collision risk should be taken account of in proposals that require an authorisation. | The Project has been designed to avoid introducing hazards to commercial shipping or watercraft navigation along the tidal River Ouse, thereby eliminating any increased collision risk that could precipitate a secondary release of hazardous substances or marine pollutants.<br>The crossing of the navigable River Ouse (Route Sections A and B) maintains full statutory vertical clearance above the waterway for high-voltage electricity lines, ensuring that commercial cargo vessels, tankers, and river craft can transit safely beneath the conductors without restriction or physical collision hazard. Pylons 4AF77 and 4AF78 are set back approximately 90 m from the riverbanks and are located wholly onshore above Mean High Water Springs (MHWS), ensuring no in-water structures or obstructions to the navigational fairway.<br>Conductor stringing across the river will be undertaken using aerial methods (drones or helicopters), removing the need for barges, tugs, work vessels, or pull-wires in the tidal channel. Consequently, the works introduce no navigational obstruction or elevated vessel collision risks during either the construction or operational phases.<br>Regarding terrestrial operations and storage of materials near river catchments, comprehensive pollution prevention and control measures are embedded into the scheme in accordance with NPS EN-1 (Section 4.12, 4.14, and 5.15). As set out in **Application Document 7.2 Outline Code of Construction Practice** and the **Application Document 7.3 Register of Environmental Actions and Commitments (REAC)**, all storage and handling of fuels, oils, chemicals, and potentially polluting substances will comply with the Control of Pollution (Oil Storage) (England) Regulations 2001 and Environment Agency guidance. Dedicated fuel storage areas will be sited away from watercourses and drainage ditches, bunded to 110% capacity, provided with spill kits, and managed under strict emergency response procedures secured via Requirements of **Application Document 3.1 Draft Development Consent Order**.<br>Consultation with the Health and Safety Executive (HSE) confirmed that the Project Order Limits do not lie within the consultation zones of any Major Accident Hazard Sites or Major Accident Hazard Pipelines, and Hazardous Substances Consent is not required.<br>The scheme does not increase navigational collision risk or the associated risk of accidental hazardous releases, fully according with this policy requirement |
| ***Objective 7:***<br>***To protect, conserve and, where appropriate, recover biodiversity that is in or dependent upon the East marine plan areas.*** | | |
| Policy BIO1 | Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including on habitats and species that are protected or of conservation concern in the East marine plans and adjacent areas (marine, terrestrial). | Siting, design, and construction methodologies for the Project attach high weight to biodiversity protection, following the mitigation hierarchy to avoid, minimise, and mitigate potential impacts on protected habitats and species across the marine-terrestrial interface in accordance with NPS EN-1 (Section 5.4).<br>The assessment has been informed by comprehensive ecological and ornithological field surveys and desk studies representing the best available scientific evidence, reported in **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, **Application Document 6.9 Environmental Statement Chapter 9 Ornithology**, and **Application Document 5.2 Habitats** |

| Policy | East Inshore Marine Plan Policy Requirement | Project Compliance |
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| | | **Regulations Assessment Report**. These baseline studies evaluate European Marine Sites (Humber Estuary SAC, SPA, and Ramsar site), national statutory designations (Humber Estuary SSSI), non-statutory reserves (Blacktoft Sands RSPB reserve), and species of conservation concern (including qualifying estuarine waterfowl, migratory fish, bats, otter, and water vole).<br>Direct disturbance to intertidal and riverbed habitats is completely avoided, as no permanent infrastructure, temporary compounds, or vehicle tracking will occur below Mean High Water Springs (MHWS). Crossing pylons 4AF77 and 4AF78 are located entirely on terrestrial agricultural land, set back approximately 90 m from the banks of the River Ouse. Conductor stringing across the river will be undertaken using aerial techniques (drones or helicopters), avoiding vessel movements, bed disturbance, or physical interference with mudflat and saltmarsh habitats.<br>To protect mobile avian species of conservation concern from collision and barrier effects, the River Ouse crossing is aligned in close parallel with the existing 4ZQ 400 kV overhead line, matching tower heights and conductor spans. Site-specific bird flight diverters will also be installed on the earth wires. Construction noise and vibration near the river corridor are controlled via commitment NV25 of the **Application Document 7.3 Register of Environmental Actions and Commitments** to prevent acoustic disruption to migratory fish during sensitive migration windows. Runoff and water quality controls are secured via the **Application Document 7.2 Outline Code of Construction Practice**.<br>Furthermore, in accordance with the Environment Act 2021 and NPS EN-1 (Section 4.6), the Project is committed to delivering at least 10% Biodiversity Net Gain (BNG) using the Statutory Biodiversity Metric, as detailed in **Application Document 7.1 Biodiversity Net Gain Report** and delivered through habitat creation and long-term management secured under **Application Document 7.8 Outline Landscape and Ecology Management Plan** and Requirements of **Application Document 3.1 Draft Development Consent Order**.<br>The Project is based on robust ecological evidence, avoids adverse effects on the integrity of designated sites and marine species , delivers net biodiversity benefits, and complies fully with Policy BIO1. |
| Policy BIO2 | Where appropriate, proposals for development should incorporate features that enhance biodiversity and geological interests. | Siting and design of the Project have adhered to the mitigation hierarchy to avoid and minimise impacts on ecological networks and geological features, incorporating dedicated measures to conserve and measurably enhance biodiversity and protect geodiversity across the marine-terrestrial interface in accordance with NPS EN-1 (Section 4.6 and Section 5.4).<br>The tidal River Ouse crossing (Route Sections A and B) completely avoids direct physical works, permanent structures, or working compounds below Mean High Water Springs (MHWS). Conductor stringing across the tidal river channel will be carried out using aerial methods (drones or helicopters), thereby avoiding riverside working areas, vessel movements, and dredging, and preventing any physical scouring, erosion, or disruption of the riverbed, estuarine sediments, and bank geomorphology. Pylons 4AF77 and 4AF78 are set back approximately 90 m from the water's edge on agricultural land, ensuring the physical and geological integrity of the river margins and intertidal mudflats is fully preserved.<br>Ecological and ornithological assessments are detailed in **Application Document 6.8 Environment Statement Chapter 8 Ecology** and **Application Document 6.9 Environmental Statement Chapter 9 Ornithology**. To protect mobile estuarine bird populations and ecological connectivity across the river corridor, the crossing alignment parallels the existing 4ZQ 400 kV overhead line, matching tower heights and lattice profiles, with site-specific bird flight diverters installed on the earth wires. Construction vibration controls secured via commitment NV25 of the **Application Document 7.3 Register of Environmental Actions and Commitments** safeguard migratory fish passage in the river.<br>The Project is committed to delivering at least 10% Biodiversity Net Gain (BNG) in accordance with the Environment Act 2021 and NPS EN-1, using the Statutory Biodiversity Metric. As set out in **Application Document 7.1 Biodiversity Net Gain Report**, this will be achieved through extensive |

| Policy | East Inshore Marine Plan Policy Requirement | Project Compliance |
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| | | native habitat creation and enhancement—including species-rich native hedgerows, scrub, and woodland planting—managed through **Application Document 7.8 Outline Landscape and Ecology Management Plan** and secured via Requirements of the **Application Document 3.1 Draft Development Consent Order**. Temporary working areas will be de-compacted and reinstated to their prior agricultural condition following the completion of works in accordance with the **Application Document 7.2 Outline Code of Construction Practice**.<br>The Project safeguards geological and estuarine features, avoids adverse effects on the natural environment, and delivers substantial biodiversity enhancements, fully complying with this policy requirement. |
| ***Objective 8:***<br>***To support the objectives of Marine Protected Areas (and other designated sites around the coast that overlap, or are adjacent to the East marine plan areas), individually and as part of an ecologically coherent network.*** | | |
| Policy MPA1 | Any impacts on the overall Marine Protected Area network must be taken account of in strategic level measures and assessments, with due regard given to any current agreed advice on an ecologically coherent network. | Siting, design, and environmental appraisals for the Project have taken full account of the statutory Marine Protected Area (MPA) network, evaluating the ecological coherence, connectivity, and conservation objectives of protected sites across the tidal River Ouse and wider Humber Estuary in accordance with NPS EN-1 (Section 4.3 and Section 5.4).<br>The assessment has had due regard to statutory conservation advice from Natural England and the Joint Nature Conservation Committee (JNCC) regarding the National Site Network and Marine Protected Areas, reported in **Application Document 5.2 Habitats Regulations Assessment Report, Application Document 6.8 Environmental Statement Chapter 8 Ecology**, and **Application Document 6.9 Environmental Statement Chapter 9 Ornithology**. Designated components evaluated include the Humber Estuary Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site, and SSSI.<br>• **Avoidance of direct network disruption:** Siting of the tidal River Ouse crossing (Route Sections A and B) completely avoids physical footprint or construction within the MPA network. Pylons 4AF77 and 4AF78 are located entirely on terrestrial arable land above Mean High Water Springs (MHWS), set back approximately 90 m from the riverbanks. No towers, footings, access routes, or compound areas will be constructed within the intertidal or marine environment, preventing direct habitat loss, fragmentation, or disturbance to qualifying estuarine habitats (such as Atlantic salt meadows and intertidal mudflats).<br>• **Aerial conductor installation:** Conductor stringing across the tidal river channel will be carried out using aerial methods (drones or helicopters). This removes the need for work barges, tugs, winches, or safety boats within the watercourse, eliminating benthic scour, riverbed sediment suspension, and physical barriers to migratory aquatic species within the MPA network.<br>• **Ecological connectivity and bird collision risk: Siting** of the crossing in close parallel with the existing 4ZQ 400 kV overhead line avoids introducing a disparate linear obstacle into the flight corridors of qualifying bird species (such as golden plover, lapwing, and marsh harrier). Matching tower heights and lattice configurations, combined with site-specific bird flight diverters installed on earth wires, minimises collision risk and preserves ecological connectivity between estuarine feeding, roosting, and inland foraging habitats.<br>• **Water quality and migratory fish passage:** Standard environmental protection commitments secured under the **Application Document 7.2 Outline Code of Construction Practice** and the **Application Document 7.3 Register of Environmental Actions and Commitments** (commitments GG16, GG17, and W05) prevent sediment runoff or pollution into the River Ouse. Working window and vibration controls (commitment NV25) safeguard migratory fish corridors (including river lamprey and sea lamprey) during sensitive transit periods.<br>• **Strategic integrity and conclusions:** As concluded in **Application Document 5.2 Habitats Regulations Assessment Report** and summarised in **Application Document 5.5 Planning** |

| Policy | East Inshore Marine Plan Policy Requirement | Project Compliance |
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| | | **Statement**, the Project will have no adverse effect on the integrity (AEOI) of any European Marine Site or component of the MPA network, either alone or in combination with other plans or projects.<br>Siting and mitigation safeguard the ecological coherence and long-term viability of the MPA network, fully according with Policy MPA1. |
| ***Objective 9:***<br>***To facilitate action on climate change adaptation and mitigation in the East marine plan areas.*** | | |
| Policy CC1 | Proposals should take account of:<br>• how they may be impacted upon by, and respond to, climate change over their lifetime and<br>• how they may impact upon any climate change adaptation measures elsewhere during their lifetime<br>Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts. | A Climate Change Resilience Assessment (CCRA) has been undertaken for the Application and is presented in **Application Document 6.19.A2 Environmental Statement Appendix 19.2 Climate Change Risk Assessment**. The CCRA concludes that as a result of the embedded climate change mitigation, all climate change risks during the construction, and operation and maintenance phases of the Project are not significant.<br>**Application Document 6.19.A3 Environmental Statement Appendix 19.3 In-Combination Climate Change Impact Assessment** provides an assessment of the combined impact of future climate conditions and the Project on receptors in the surrounding environment. Potential ICCIs during the construction, and operation and maintenance phases of the Project were assessed, together with the relevant embedded mitigation measures. While a number of ICCIs were identified across environmental topics, all were assessed as resulting in effects that are not significant.<br>A Lifecycle GHG Assessment is presented in **Application Document 6.19 Environmental Statement Chapter 19 Climate Change**. It concludes that while the Project will result in GHG emissions during construction and operation, there will not be a significant effect as it will also play an important role in facilitating the decarbonisation of the UK electricity system by enabling the connection and transmission of renewable and low-carbon energy.<br>Measures have been embedded into the design of the Project to mitigate against GHG emissions including commitments set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, Sustainable, low-carbon materials specified and prioritised wherever practicable, supported by material selection processes aimed at minimising embodied carbon across the Project lifecycle, materials sourced from local suppliers where reasonably practicable, to minimise transportation distances and associated GHG emissions, and sensitive routeing and siting of permanent infrastructure and temporary works. A detailed breakdown of GHG emissions and opportunities to reduce these is provided in **Application Document 6.19.A4 ES Appendix 19.4 Greenhouse Gas Reduction Strategy**. |
| Policy CC2 | Proposals for development should minimise emissions of greenhouse gases as far as is appropriate. Mitigation measures will also be encouraged where emissions remain following minimising steps. Consideration should also be given to emissions from other activities or users affected by the proposal. | |
| ***Objective 10:***<br>***To ensure integration with other plans, and in the regulation and management of key activities and issues, in the East marine plans, and adjacent areas.*** | | |
| Policy GOV1 | Appropriate provision should be made for infrastructure on land which supports activities in the marine area and vice versa. | The Project directly fulfills this objective by providing essential, nationally significant onshore transmission infrastructure that connects, transmits, and integrates clean energy generated within the offshore marine area into the National Electricity Transmission System. |
| Policy GOV2 | Opportunities for co-existence should be maximised wherever possible. | Siting and design of the Project have been developed in direct accordance with the principle of co-existence, seeking to minimise spatial footprint and maximise shared utility across marine-terrestrial boundaries:<br>• Shared Infrastructure Corridors: Where the 400 kV overhead line reinforcement traverses the tidal River Ouse corridor (Route Sections A and B), it is routed in close parallel with the existing 4ZQ 400 kV overhead line. By consolidating linear energy infrastructure within an established transmission corridor, the scheme avoids fragmenting undeveloped open expanses and preserves adjacent land and water space for existing and future uses. |

| Policy | East Inshore Marine Plan Policy Requirement | Project Compliance |
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| | | • Co-existence with Commercial Navigation and Port Activities: The crossing of the navigable River Ouse maintains full statutory vertical clearance above the fairway, ensuring unhindered co-existence with commercial shipping transit, maintenance dredging, and recreational craft. Pylons 4AF77 and 4AF78 are set back approximately 90 m from the water's edge above Mean High Water Springs (MHWS). Conductor stringing across the river channel will be carried out using aerial methods (drones or helicopters), avoiding work vessels, barges, or cables in the water and enabling maritime operations to continue uninterrupted throughout construction.<br>• Co-existence with Agriculture and Public Access: Lattice transmission pylons occupy very small, footprints at their foundations, allowing agricultural land beneath the overhead line conductors to continue in productive arable cultivation during operation. Recreational access along riparian corridors, including the Trans Pennine Trail and National Cycle Network Route 65, will co-exist with the works through managed crossings and clearly signposted temporary diversions under the **Application Document 7.6 Outline Public Rights of Way Management Plan.**<br>• Inter-project Coordination: Interactions with other planned regional infrastructure developments have been actively managed through consultation and detailed in **Application Document 5.11 Interrelationship Document** to identify opportunities for shared haul routes, coordinated timing, and integrated environmental enhancements.<br>As concluded in **Application Document 5.5 Planning Statement**, the Project embeds spatial efficiency and multi-activity integration, fully according with the policy objective to maximise co-existence. |
| Policy PS3 | Proposals should demonstrate, in order of preference:<br>a) that they will not interfere with current activity and future opportunity for expansion of ports and harbours<br>b) how, if the proposal may interfere with current activity and future opportunities for expansion, they will minimise this<br>c) how, if the interference cannot be minimised, it will be mitigated<br>d) the case for proceeding if it is not possible to minimise or mitigate the interference | Siting and design of the Project have adhered to the mitigation hierarchy from inception, satisfying the primary preference of the policy by avoiding interference with existing operations or future growth opportunities of ports and harbours within the Humber Estuary and River Ouse corridor:<br>• Avoidance of direct interference with port activity and expansion: The Project involves no physical infrastructure, land-take, or marine works within port operational areas, dock estates, or port expansion zones. All permanent transmission structures (pylons 4AF77 and 4AF78) crossing the tidal River Ouse are situated entirely onshore on agricultural land above Mean High Water Springs (MHWS), set back approximately 90 m from the riverbanks. This ensures that adjacent riverfront frontages and potential future port or wharf development land are neither sterilised nor physically constrained.<br>• Unrestricted commercial navigation: The River Ouse functions as an active commercial transit corridor serving inland ports, including the Port of Goole. Siting and design have embedded full statutory vertical clearance above the navigable waterway for high-voltage electricity lines in accordance with navigational safety standards. This guarantees that commercial shipping movements, cargo vessels, tugs, and maintenance craft transiting to and from port facilities will continue without restriction during operation<br>• Minimisation and avoidance of construction disruption: Conductor stringing across the tidal river channel will be carried out using aerial methods (drones or helicopters). By eliminating the deployment of work barges, tugs, winches within the active navigable fairway, the Project requires no temporary river closures or transit restrictions that could otherwise delay commercial shipping or disrupt port supply chains.<br>• Traffic management: Onshore construction vehicle movements and abnormal indivisible loads (AILs) will use established strategic highway routes and will be controlled through the **Application Document 7.4 Outline Construction Traffic Management Plan**, secured via Requirements of **Application Document 3.1 Draft Development Consent Order**, ensuring no conflicting congestion or capacity impacts on road networks serving local ports.<br>• Case for proceeding: As demonstrated in **Application Document 5.5 Planning Statement**, the Project is Critical National Priority (CNP) infrastructure under NPS EN-1 (Section 4.2), essential to unlocking grid capacity for offshore wind and low-carbon generation. By maintaining |

| Policy | East Inshore Marine Plan Policy Requirement | Project Compliance |
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| | | unrestricted fairway clearances and avoiding all port estates, the scheme operates without detriment to port operations while delivering substantial national strategic benefits.<br>The Project therefore fully satisfies criterion (a) of the Policy PS2 hierarchy. |
| Policy DD1 | Proposals within or adjacent to licensed dredging and disposal areas should demonstrate, in order of preference<br>a) that they will not adversely impact dredging and disposal activities<br>b) how, if there are adverse impacts on dredging and disposal, they will minimise these<br>c) how, if the adverse impacts cannot be minimised they will be mitigated<br>d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts | Siting and design of the Project satisfy the primary preference of Policy DD1 by avoiding adverse impacts on licensed dredging and disposal activities within the River Ouse and wider Humber Estuary corridor:<br>• Avoidance of direct overlap with licensed sites: Siting of the 400 kV overhead line crossing of the tidal River Ouse (Route Sections A and B) does not physically overlap with, traverse, or border any designated marine disposal sites or areas licensed for the deposit of dredged material.<br>• No in-channel works or riverbed disturbance: Siting of crossing pylons 4AF77 and 4AF78 maintains a setback of approximately 90 m from the water's edge entirely onshore above Mean High Water Springs (MHWS). Conductor stringing across the river will be undertaken using aerial methods (drones or helicopters), thereby eliminating work vessels, barges, spud legs, or anchor lines in the channel. The Project requires no capital dredging, operational dredging, or sediment disposal activities of its own.<br>• Preservation of maintenance dredging operations: The River Ouse is an active commercial navigation corridor requiring periodic maintenance dredging to maintain channel depths for vessels transiting to inland docks such as the Port of Goole. Siting and structural profiles have embedded full statutory vertical clearance above the navigable waterway for 400 kV electricity lines in accordance with navigational safety standards. These clearances ensure that dredging vessels, hopper barges, and associated maritime plant can transit and operate beneath the conductors safely without operational restrictions, height constraints, or scheduling conflicts during both the construction and operational phases.<br>• Water quality and hydrodynamic integrity: Terrestrial construction activities near the river corridor are managed under the **Application Document 7.2 Outline Code of Construction Practice** and commitments GG16, GG17, and W05 of the **Application Document 7.3 Register of Environmental Actions and Commitments**. These controls prevent sediment-laden runoff or chemical discharges from entering watercourses, ensuring the scheme will not alter estuarine hydrodynamics, sediment transport regimes, or deposition patterns in a manner that would increase siltation rates or exacerbate maintenance dredging burdens elsewhere.<br>• Case for proceeding: The Project is Critical National Priority (CNP) infrastructure under NPS EN-1 (Section 4.2), essential to transferring renewable energy from offshore wind generation to regional demand centres. Because the scheme avoids interference with dredging operations and disposal sites entirely, it delivers these vital national public benefits while satisfying criterion (a) of the Policy DD1 hierarchy. |
| Policy FISH1 | Within areas of fishing activity, proposals should demonstrate in order of preference:<br>a) that they will not prevent fishing activities on, or access to, fishing grounds<br>b) how, if there are adverse impacts on the ability to undertake fishing activities or access to fishing grounds, they will minimise them<br>c) how, if the adverse impacts cannot be minimised, they will be mitigated<br>d) the case for proceeding with their proposal if it is not possible to minimise or mitigate the adverse impacts | Siting, design, and construction methodologies for the Project satisfy the primary preference of Policy FISH1 by avoiding interference with fishing activities or access to fishing grounds within the tidal River Ouse and wider Humber Estuary corridor:<br>• Avoidance of physical obstruction or exclusion zones: Siting of the proposed 400 kV overhead line crossing of the tidal River Ouse (Route Sections A and B) involves no physical works, structures, or working areas below Mean High Water Springs (MHWS). Crossing pylons 4AF77 and 4AF78 are sited entirely on agricultural land, set back approximately 90 m from the riverbanks. The Project does not create any permanent or temporary exclusion zones that would prevent commercial fishing vessels, netting, or recreational angling activities along the river corridor.<br>• Aerial conductor installation: Conductor stringing across the tidal river channel will be undertaken using aerial methods (drones or helicopters). This avoids the deployment of work barges, safety vessels, winches, or cables within the watercourse, ensuring that fishing craft and other river |
| Policy FISH2 | Proposals should demonstrate, in order of preference:<br>a) that they will not have an adverse impact upon spawning and nursery areas and any associated habitat | |

| Policy | East Inshore Marine Plan Policy Requirement | Project Compliance |
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| | b) how, if there are adverse impacts upon the spawning and nursery areas and any associated habitat, they will minimise them<br>c) how, if the adverse impacts cannot be minimised they will be mitigated<br>d) the case for proceeding with their proposals if it is not possible to minimise or mitigate the adverse impacts | users experience no navigational obstruction, displacement, or loss of access to fishing grounds throughout the construction period.<br>• Statutory navigational clearances: The River Ouse crossing maintains full statutory vertical clearance above the navigable waterway for high-voltage electricity lines, ensuring that fishing vessels and gear can continue to transit and operate safely beneath the overhead line during operation without restriction.<br>• Protection of fish stocks and migratory corridors: As assessed in **Application Document 6.8 Environment Statement Chapter 8 Ecology** and **Application Document 6.11 Environmental Statement Chapter 11 Water Environment)**, potential indirect impacts on fish species of commercial, recreational, or conservation value (including migratory species such as Atlantic salmon, sea trout, river lamprey, and European eel) are avoided or mitigated. Construction vibration controls secured via commitment NV25 of the **Application Document 7.3 Register of Environmental Actions and Commitments** safeguard migratory passage through the river. Runoff and silt control measures set out in the **Application Document 7.2 Outline Code of Construction Practice** protect estuarine water quality and spawning/nursery grounds from sediment or chemical pollution.<br>• Case for proceeding: As demonstrated in **Application Document 5.5 Planning Statement**, the Project is Critical National Priority (CNP) infrastructure under NPS EN-1 (Section 4.2), essential to transferring renewable energy from offshore wind generation to regional demand centres. Because the scheme fully safeguards access to fishing grounds and avoids adverse impacts on fisheries, it achieves full compliance under criterion (a) of the Policy FISH1 and FISH 2 hierarchy. |
| Policy TR1 | Proposals for development should demonstrate that during construction and operation, in order of preference:<br>a) they will not adversely impact tourism and recreation activities<br>b) how, if there are adverse impacts on tourism and recreation activities, they will minimise them<br>c) how, if the adverse impacts cannot be minimised, they will be mitigated<br>d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts | Siting, design, and construction methodologies for the Project adhere strictly to the mitigation hierarchy set out in Policy TR1, systematically addressing effects across both construction and operational phases:<br>• Avoidance of direct impacts on marine and river recreation: Siting of the 400 kV overhead line crossing of the tidal River Ouse (Route Sections A and B) involves no physical works, structures, or working compounds below Mean High Water Springs (MHWS). Pylons 4AF77 and 4AF78 are set back approximately 90 m from the water's edge. Conductor stringing across the river channel will be carried out using aerial methods (drones or helicopters), thereby eliminating work vessels, barges, or cables in the water and avoiding river closures or disruption to recreational boating, watercraft transit, and angling along the river corridor.<br>• Minimisation of recreational disruption: Public rights of way and long-distance recreational routes along the river margins—including the Trans Pennine Trail and National Cycle Network (NCN) Route 65—will remain accessible during construction. Siting and construction staging have sought to avoid closures; where short-term, temporary restrictions are unavoidable during conductor pulling, safe managed crossings or clearly signposted, comparable diversions will be implemented in accordance with **Application Document 7.6 Outline Public Rights of Way Management Plan**. Standard construction controls secured in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments** restrict working hours to core daytime periods and control dust and noise. Lighting controls (commitment GG21) ensure directional, low-luminance lighting is used to avoid visual distraction or light spill toward recreational watercraft and paths.<br>• Mitigation of landscape and visual effects: Tourism and recreation assets have been evaluated in **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**. Visual intrusion on visitors to nearby recreational destinations, including the Blacktoft Sands RSPB Reserve and recreational riverside paths—has been minimised by aligning the overhead line in close parallel with the existing 4ZQ 400 kV line, matching lattice pylon heights and profiles to consolidate |

| Policy | East Inshore Marine Plan Policy Requirement | Project Compliance |
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| | | infrastructure in an existing corridor. Residual effects on visitors to Blacktoft Sands are assessed as negligible adverse (not significant). Screen and replacement planting to soften views of the crossing infrastructure is secured via **Application Document 7.8 Outline Landscape and Ecology Management Plan** and Requirement 4 and Requirement 8 of **Application Document 3.1 Draft Development Consent Order**. Following construction, all temporary access areas and working land will be fully reinstated to their previous condition.<br>• Case for proceeding: As demonstrated in **Application Document 5.5 Planning Statement**, the Project is Critical National Priority (CNP) infrastructure under NPS EN-1 (Section 4.2), essential to transferring renewable electricity to regional demand centres. In accordance with NPS EN-1 (Paragraph 4.2.28), the urgent strategic need and substantial national public benefits of reinforcing the transmission network clearly outweigh any temporary, localised disruption or residual visual amenity impacts that cannot be fully eliminated.<br>The Project therefore accords with the sequential hierarchy of Policy TR1. |
| Policy TR2 | Proposals that require static objects in the East marine plan areas, should demonstrate, in order of preference:<br>a) that they will not adversely impact on recreational boating routes<br>b) how, if there are adverse impacts on recreational boating routes, they will minimise them<br>c) how, if the adverse impacts cannot be minimised, they will be mitigated<br>d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts | Siting and design of the Project satisfy the primary preference of Policy TR2 by avoiding adverse impacts on recreational boating routes along the tidal River Ouse and wider Humber Estuary corridor:<br>• Avoidance of static obstructions within navigable waters: Siting of the proposed 400 kV overhead line crossing of the tidal River Ouse (Route Sections A and B) introduces no static structures, foundations, or permanent apparatus below Mean High Water Springs (MHWS). Pylons 4AF77 and 4AF78 are located entirely onshore on agricultural land, set back approximately 90 m from the water's edge. Consequently, the scheme places no physical or static obstacles within the active river channel, foreshore, or recreational boating fairway.<br>• Maintenance of statutory air draft clearances: While overhead transmission conductors span the River Ouse, the crossing has been designed to provide full statutory vertical clearance above the navigable channel for high-voltage electricity lines in accordance with navigational safety standards. These clearances comfortably accommodate recreational sailing craft, motor cruisers, and inland waterways vessels, ensuring that recreational transit along the river is not restricted, hindered, or subjected to air draft collision risks during operation.<br>• Avoidance of construction transit disruption: Conductor stringing across the tidal river channel will be carried out using aerial methods (drones or helicopters). By eliminating the need for temporary floating plant, work barges, tugs, or pull-wires in the channel, recreational watercraft transit will not be closed, diverted, or obstructed during construction. In addition, directional, low-luminance lighting secured under commitment GG21 of **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.2 Outline Code of Construction Practice** will avoid glare or visual distraction to skippers and recreational boaters navigating the river at night or during twilight.<br>• Case for proceeding: The Project is Critical National Priority (CNP) infrastructure under NPS EN-1 (Section 4.2), essential to transferring renewable electricity to regional demand centres. Because the scheme avoids placing static structures within the waterway and maintains unrestricted navigational headroom, it delivers critical national public benefits while fully satisfying criterion (a) of the Policy TR2 hierarchy. |

## 2.4 National Planning Policy Framework (NPPF)

2.4.1 Only policies that differ or add to policies in NPS EN-1 and NPS EN-5 are included in this section. This is because NPS EN-1 and NPS EN-5 take precedence over the NPPF as the national policy statements for nationally significant infrastructure, except for where additional policy requirements are set out in the NPPF, which are a material consideration.

Table 2.4 – Signposting for Compliance with NPPF (Updated February 2025)

| Para | NPPF Policy Requirement | Project Compliance |
|---|---|---|
| **DM1: Preparing development proposals** | | |
| 1. | Proposals for major development should:<br>a. Be informed by early engagement with neighbours and the local community, as well as with the local planning authority, statutory consultees, infrastructure providers, registered providers of social housing and other relevant bodies where appropriate, to identify and seek to resolve key planning matters prior to the submission of a planning application. This pre-application engagement should be proportionate to the nature of the proposal and those likely to be affected by it; and<br>b. Be accompanied by a concise planning statement setting out:<br>i. How the development proposal is consistent with relevant development plan and national decision-making policies;<br>ii. The outcome of pre-application engagement and the extent to which the proposal has changed in response to this engagement; and<br>iii. The proposed use of any planning obligations to make the proposal acceptable in planning terms. | Stakeholder engagement has formed a key part of the Project development since the Project's inception. National Grid has undertaken consultation with relevant bodies and the feedback received has informed the development of the Project, including the non-statutory consultation in 2023, localised non-statutory consultation in 2024 and statutory consultation in 2025. Further details on the consultation events can be found in **Application Document 5.1 Consultation Report**.<br>The design has evolved through ongoing engagement and consultation, including both non-statutory and statutory stages. Feedback from local communities, landowners, statutory consultees and other stakeholders has been carefully considered alongside environmental assessments and engineering studies to inform refinements to routeing, siting, access arrangements and construction methodology.<br>National Grid has also undertaken a number of environmental and thematic meetings with environmental organisations to gather information about the baseline environment, scope of the assessment and potential effects and proposed mitigation.<br>The Project is accompanied by **Application Document 5.5 Planning Statement** which sets out an appraisal of how the Project accords with relevant national and development plan policies. |
| **CC2: Mitigation of climate change** | | |
| 1. | In order to contribute to climate change mitigation and the transition to net zero, development proposals should, where relevant to the proposal:<br>a. Accord with policies TR3 and TR4 so that sustainable patterns of movement are prioritised, opportunities are taken to improve walking, wheeling, cycling and public transport, and infrastructure is provided to support the transition to zero-emission vehicles;<br>b. Support good access to facilities in order to limit the need to travel, whether through the development's location, through development densities which improve catchment populations for local services, or by incorporating community facilities and premises to support local employment opportunities;<br>c. Use design approaches which conserve energy and other resources in accordance with policy DP3(2)(b);<br>d. Take advantage of opportunities to reuse existing structures and materials, including by reusing non-contaminated excavated soil and hardcore within the site;<br>e. Take advantage of opportunities to draw low carbon energy from decentralised networks (such as district heat networks), where these are available, and to co-locate energy and heat generators and users, especially to take advantage of suppliers of surplus heat and energy;<br>f. Contribute to the creation or restoration of habitats which can act as carbon stores, such as through woodland planting and peatland restoration, while avoiding harm to habitats which can act as important carbon stores, including peatland and salt marsh; and<br>g. Not involve the extraction of fossil fuels unless it is in accordance with policy M5 | The Project commits to control and management measures during construction to minimise potential impacts, as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, **Application Document 7.4 Outline Construction Traffic Management Plan**, **Application Document 7.6 Outline Public Rights of Way Management Plan** and **Application Document 7.2 Outline Code of Construction Practice**. These include (but are not limited to):<br>• Maintaining access to community facilities, businesses, tourism assets and recreational areas where practicable when they fall within the Order Limits. Where closures are unavoidable, appropriate temporary access arrangements will be provided, including diversions with advance notice signage, ensuring that affected users are clearly informed of changes before and throughout the construction period.<br>• Managing PRoW crossing working areas in discussion with the relevant local authorities and applications for any temporary closures would be discussed with the relevant local authority. Access disruption will be minimised, where practicable and safe, while construction activities occur. Any required temporary diversions will be clearly marked at both ends with signage explaining the diversion, the duration of the diversion and a contact number for any concerns.<br>**Application Document 6.5 Environmental Statement Chapter 4 Description of Project** sets out that it is assumed that any soil excavated from the Project (e.g. displaced from pylon foundations or third-party service cable ducts) would be reused on-site where soil is suitable for reuse (for example, not contaminated and giving consideration to land holdings and applicable biosecurity measures). This could be through the backfilling of foundations removed during 400 kV overhead line removal or for landscaping. It is assumed that all soil could be reused on-site; however, if it arises that excess soil cannot be reused on-site, this soil would be taken off-site to an appropriate facility. |

| Para | NPPF Policy Requirement | Project Compliance |
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| | | **Application Document 6.19 Environmental Statement Chapter 19 Climate Change** presents an assessment of the likely significant effects of the Project on the climate and climate change effects that affect the Project and surrounding environment. In accordance with the IEMA Climate Change Resilience and Adaptation Guidance (Institute of Environmental Management and Assessment, 2020) National Grid has set out embedded mitigation measures which are intrinsic to and built into the design of the Project that have been integral in reducing and where possible avoiding impacts on climate change are set out in **Application Document 7.3 Register of Environmental Actions and Commitments** and include:<br>• The routeing and design of the Project including co-location and parallel alignment with existing overhead line infrastructure to avoid environmentally sensitive features and minimise land-take and habitat loss and associated emissions;<br>• Commitments made in **Application Document 7.2 Outline Code of Construction Practice** and, **Application Document 7.4 Outline Construction Traffic Management Plan** relating to construction such as the inclusion of strategically located temporary haul roads and access routes to improve construction efficiency and reduce vehicle movements; and<br>• The use of low carbon construction methods, transport and materials where practicable to minimise embodied carbon and emissions across the Project lifecycle.<br>New trees will be planted in proposed mitigation planting areas to extend existing woodland and provide links. The location of new tree planting is shown in **Application Document 7.8 Outline Landscape and Ecology Management Plan** including an Outline Landscape Maintenance and Management Plan. |
| **CC3: Adaptation to climate change** | | |
| 1. | Development proposals should take into account the current and potential impacts of climate change over the lifetime of the scheme, and in order to minimise vulnerability to these impacts should, where relevant to the proposal:<br>a. Be located where the risk of flooding is minimised, or can be managed and the development made safe without increasing risk elsewhere, in accordance with policies F4, F5, F6, F7 and F8;<br>b. Comply with policy F9 where development would be located in an area vulnerable to coastal change, as specified in that policy;<br>c. Incorporate sustainable drainage systems to manage surface water flow rates and reduce volumes of runoff in accordance with policy F8;<br>d. Use design approaches which minimise risks from overheating in accordance with policy DP3(2)(b), and include green infrastructure and suitable tree planting in accordance with policies DP3(2)(c) and N3; and<br>e. Incorporate proportionate measures to mitigate against wildfires, where opportunities to do so exist and wildfires pose a particular risk (for example as a result of the combined effect of topography, prevailing wind direction and being located within or adjacent to heavily vegetated areas). Such measures should be designed to limit fuel loads for fires, and to create defendable spaces, such as by avoiding timber panel fences and incorporating firebreaks into development layouts and planting schemes. | **Application Document 6.19 Environmental Statement Chapter 19 Climate Change** presents an assessment of the likely significant effects of the Project on the climate and climate change effects that affect the Project and surrounding environment. In accordance with the IEMA Climate Change Resilience and Adaptation Guidance (Institute of Environmental Management and Assessment, 2020), and as set out in the methodology detailed in section 19.4 of the chapter, the assessment has evaluated the Project's vulnerability and resilience to relevant climate-related hazards and the potential risks these may pose to the Project. Government guidance and industry standard benchmarks has been used to inform the assessment in accordance with the EIA Regulations. The assessment has used the scenarios set out in the UK national carbon budgets (HM Government, 2021), to represent future emissions inventory scenarios for the UK.<br>A Lifecycle GHG Assessment is presented in **Application Document 6.19 Environmental Statement Chapter 19 Climate Change**. It concludes that while the Project will result in GHG emissions during construction and operation, there will not be a significant effect as it will also play an important role in facilitating the decarbonisation of the UK electricity system by enabling the connection and transmission of renewable and low-carbon energy.<br>A sequential approach has been taken in siting the Project infrastructure. However, due to the linear nature of the Project, its large geographical scale, and its location, parts of the Order Limits necessarily encroach into areas with a medium or high likelihood of flooding.<br>During construction, parts of the Project are at medium and high risk of fluvial and tidal flooding due to temporary works being located within main river floodplains, namely the Humber, Ouse, Trent and Torne floodplains. These risks would be reduced through embedded mitigation and control and management measures which include managing these worksites in accordance with a Flood Warning and Evacuation Plan set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**. |

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| | | During the operational phase, the Project is considered to be at low risk of flooding from all sources assessed in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment** and **Application Document 7.13 Flood Risk Assessment** due to the mitigation measures built into its design. The Project is not anticipated to increase flood risk elsewhere during its operation as any losses of floodplain storage would be compensated for. New impermeable surfaces would be very localised to pylon bases and rainfall runoff from these areas would be attenuated by surrounding reinstated natural ground and vegetation and would soak back into the ground. Further details on the proposals for compensatory storage have been included in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment** and **Application Document 7.13 Flood Risk Assessment**.<br>Details of the surface water drainage systems will be confirmed during the detailed design stage of the Project as secured by **Application Document 3.1 Draft Development Consent Order**. In accordance with the requirement, National Grid will submit a surface water management plan prepared substantially in accordance with the framework construction surface water management plan (**Appendix B of the Application Document 7.13 Flood Risk Assessment**). |
| **W3: Securing renewable and low carbon energy and electricity network infrastructure** | | |
| 1. | In considering proposals for renewable and low-carbon energy development and electricity network infrastructure, substantial weight should be given to:<br>a. The benefits for improving energy security, supporting economic development and/or the transition to a net zero future;<br>b. In the case of applications for the re-powering and life-extension of existing sites, the additional benefit of utilising an established site for this purpose; and<br>c. The contribution that small-scale and community-led renewable and low carbon energy projects can make to reducing greenhouse gas emissions, along with their associated economic and social benefits. | **Application Document 7.17 Strategic Options Report Including Needs Case** and section 3 of **Application Document 5.5 Planning Statement** explain that the Project is one of the essential network reinforcements needed to deliver the UK's net zero target and the Clean Power 2030 mission. **Application Document 5.5 Planning Statement** and **Application Document 7.17 Strategic Options Report Including Needs Case** set out that the Project, if consented, would support the UK's net zero target by reinforcing the electricity transmission network between the North of England and the Midlands and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The Project would help meet future energy requirements and support the transition to a net zero economy, and support security and reliability of supply. Without reinforcement, the capacity of the existing network is insufficient to accommodate the connection of proposed new power sources connecting in the area. |
| 2. | Applicants should not be required to demonstrate the need for renewable or low carbon energy development and electricity network infrastructure. Where proposals for this form of development come forward outside areas which have been identified as suitable for them in the development plan, their acceptability should be assessed against the national decision-making policies in this Framework, taken as a whole. | National Grid notes that, in accordance with this policy, the need for infrastructure such as the Project is already established. It is urgent and substantial weight should be given to this need when considering the application for development consent. |
| **M6: Safeguarding mineral resources and infrastructure through decision-making** | | |
| 1. | Proposals for non-mineral development should not:<br>a. Constrain potential future use for mineral working in a Mineral Safeguarding Area; or<br>b. Prevent or constrain the use of existing, planned and potential sites for:<br>i. The bulk transport, handling and processing of minerals;<br>ii. The manufacture of concrete and concrete products; or<br>iii. The handling, processing and distribution of substitute, recycled and secondary aggregate material. | National Grid acknowledges that parts of the study area for the Project assessments are located within an MSA, which also extends beyond the study area, across areas of the East Riding of Yorkshire, North Lincolnshire and Nottinghamshire, and that the Order Limits pass through the Wienerberger Ltd clay works.<br>Whist it is acknowledged that some temporary sterilisation of some small areas of minerals resources may occur associated with the Project, these resources could become available in the future. **Application Document 6.12.A3 Environmental Statement Appendix 12.3 Preliminary Qualitative Mineral Resource Assessment** concludes it would not be practical to extract the mineral prior to development.<br>The Project is considered to be of national significance, and therefore the need for the Project outweighs the need to safeguard the mineral deposit. Based on the national significance of the |
| 2. | Where proposals for non-mineral development are located within a Minerals Consultation Area, the decision-making authority should consult the mineral planning authority and take account of the local minerals plan before determining the planning application. | |

| Para | NPPF Policy Requirement | Project Compliance |
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| 3. | The prior extraction of minerals, where practical and environmentally feasible, should be supported where it would prevent the sterilisation of minerals deposits as a consequence of other forms of development proposals or allocations. | Project and that all affected authorities have more than the seven-year land bank of sand and gravel, as required by the NPPF, and sufficient additional safeguarded areas, it is considered that the potential impact of sterilising the small volume associated with the Project is acceptable without further consideration or mitigation. |
| **DP3: Key principles for well-designed places** | | |
| 1. | Development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings; such as through the arrangement of development plots and buildings, the use of materials and architectural features, and the restoration, reuse and integration of heritage assets. This should not preclude innovation or change where appropriate, especially where an increased scale or density of development is justified in accordance with policies L2 and L3. | The location and design of the Project is the result of a comprehensive site selection process that was led by the consideration of good design and key environmental and planning constraints to avoid and minimise impacts as early as possible. **Application Document 5.9 Design Development Report** explains where design choices have sought to reduce the environmental effects of the Project and demonstrates that the design has incorporated embedded mitigation to avoid or reduce significant environmental effects where practicable. **Application Document 7.3 Register of Environmental Actions and Commitments** details the embedded measures and additional mitigation measures that have been identified through the Environmental Impact Assessment to avoid or reduce likely significant environmental effects.<br>As set out in **Application Document 5.9 Design Development Report** the Project delivers good design by avoiding or reducing impacts on environmentally sensitive receptors as far as practicable through routeing and siting, and making efficient use of land by maximising close parallel routeing with existing electricity transmission infrastructure where reasonably practicable. Construction impacts have been reduced through the refinement of access arrangements, working areas and construction methodologies. Whole-life operational performance maintenance requirements and asset resilience have also informed design decisions. Embedded environmental mitigation has been incorporated into the design wherever reasonably practicable, as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>The Project is regarded by NPS EN-1 as nationally significant low carbon infrastructure which is of CNP. The Project will provide the urgently needed reinforcement to the transmission system in the Humber and East Midlands. Without reinforcement, the capacity of the existing network in the Humber and East Midlands is insufficient to accommodate the connection of proposed new power sources connecting in the area. In accordance with national and local policies and targets, the Project will provide this reinforcement, improving the existing electricity transmission network, and will contribute to energy independence decarbonisation requirements and climate change targets, and assist in ensuring the supply of energy remains secure, reliable and affordable.<br>Sustainability has been embedded throughout the evolution of the Project and has informed decision-making from the earliest stages of the design process. The Project has been developed through an iterative and multidisciplinary approach, and throughout the design process, sustainability considerations have been balanced alongside engineering, environmental, socio-economic and cost considerations. The Project has also been developed having regard to the principles of PAS 2080:2023 – Carbon Management in Buildings and Infrastructure, which promotes the management and reduction of whole-life carbon across the lifecycle of infrastructure assets. Consistent with the PAS 2080 hierarchy, opportunities to reduce carbon have been considered through strategic option selection, routeing, engineering design and construction planning. This has included seeking to avoid unnecessary infrastructure, minimise material use where reasonably practicable, reduce construction activities and promote efficient design solutions that support long-term operational performance. Sustainability and good design will continue to inform the Project during detailed design and delivery. Further refinement of construction methods, temporary works, access arrangements and environmental mitigation will be undertaken within the parameters secured through **Application Document 3.1 Draft Development Consent Order**.<br>Vegetation will be retained where practicable. Where vegetation is lost and trees cannot be replaced in situ due to the restrictions associated with operational safety, replacement vegetation will be planted as close by as practicable and will complement the landscape character and be sympathetic |
| 2. | To create well-designed places, development proposals should also reflect relevant aspects of the following principles, as appropriate to the nature of the development and its location:<br>a. Liveability: support healthy, mixed, vibrant and integrated communities, which will function well over the lifetime of the development, by incorporating a range of uses and tenures, employing features which promote social interaction, and which are robust, durable and easy to look after;<br>b. Climate: contribute to climate change mitigation and adaptation and the transition to net zero by using building layouts, building orientation, massing, landscaping and materials which conserve energy and other resources, and which minimise risks from the impacts of climate change including overheating;<br>c. Nature: incorporate and/or connect to a network of high quality, accessible, multifunctional green infrastructure to provide opportunities for recreation and healthy living, strengthen habitats, improve climate change resilience and improve air and water quality. This should include maintaining and enhancing tree cover and incorporating sustainable drainage systems in accordance with policies N3 and F8;<br>d. Movement: provide transport infrastructure and choices which support the design vision for the site, provide good connections to the wider settlement (or those nearby), and prioritise walking, wheeling, cycling and public transport;<br>e. Built Form: use the pattern of buildings to define the arrangement of streets, squares and other spaces, promote compact forms of development to optimise the site's potential, distinguish between public and private areas, create focal points and, where appropriate, enhance views into and out of the scheme;<br>f. Public Space: include spaces that are safe, secure, inclusive, and accessible for all ages and abilities, including for groups such as women and girls; and which facilitate and encourage social interaction, play and healthy lifestyles (for example by providing high quality, clear and legible pedestrian and cycle routes, a variety of recreational spaces and places to meet, integrating lighting and making building entrances and windows face onto streets and other public spaces to provide natural surveillance); and<br>g. Identity: create visually attractive, distinctive and characterful development to establish or maintain a strong sense of place and pride, including through the use of a coherent palette of materials, design features and planting | |
| 3. | Development proposals should be refused if, without clear justification, they conflict with paragraph 1 of this policy or relevant aspects of the principles in paragraph 2, or with any explicit design standards set out in the development plan (including those in locally specific policies, guides, codes or masterplans). Substantial weight should be given to | |

| Para | NPPF Policy Requirement | Project Compliance |
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| | compliance with relevant development plan policies when assessing the design quality of proposals. | to the local habitat type in order to provide a high biodiversity value. Mitigation planting is proposed and the habitats to be created and/or enhanced in these areas (on-site mitigation) have been designed to provide landscape and visual mitigation while also offering ecological value. Along the proposed overhead line, 60 landscape mitigation planting areas have been identified within the Order Limits to provide landscape and visual mitigation, whilst also delivering ecological benefits. Indicative landscape proposals for each of these areas are shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.<br>National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project will provide a minimum of 10% BNG (through on-site and off-site BNG) and has undertaken a BNG assessment (based on Natural England's Statutory Biodiversity Metric 2024 version (as of June 2025)) which is presented in **Application Document 7.1 Biodiversity Net Gain Report**.<br>An Outline Construction Worker Travel Plan is included within **Application Document 7.4 Outline Construction Traffic Management Plan** which sets out the principles, objectives and minimum requirements for managing construction workforce travel in a sustainable manner including minimising the number of single-occupancy car trips generated by the construction workforce; promoting sustainable modes of travel where reasonably practicable, including walking, cycling, public transport and shared transport; managing workforce travel in a way that minimises impacts on the local highway network and surrounding communities; and ensure construction workforce travel is planned, monitored and managed in a transparent and auditable manner.<br>The use of design principles has guided the development of the Project, which reflect the acknowledgement in national policy that good design for electricity transmission infrastructure is achieved through infrastructure that is safe, secure and resilient, and which responds appropriately to its environmental and community context, and is not defined solely by visual appearance. The principles considered include the Holford guidance, undergrounding policy, local planning policy, NIC Design Principles (NIC Design Group, 2020), Planning Inspectorate's Advice on Good Design and on Linear Projects (Planning Inspectorate, 2024), technical design requirements set out in legislation and policy and other relevant legislation and policies.<br>In summary, the Project delivers good design that is sustainable, in accordance with the design policies set out in national policy that acknowledge that the context of any design decisions must reflect the need to efficiently deliver large-scale energy infrastructure, and therefore (as recognised in national policy), the extent to which a scheme can contribute to the enhancement of the quality of the area is limited. |
| 4. | The principles set out in the Design and Placemaking planning practice guidance should be used to inform how this policy is applied in the absence of locally-produced design policies, guides, codes or masterplans. | |
| 5. | Substantial weight should also be given to outstanding or innovative designs which promote high levels of sustainability, or which help raise the standard of design more generally in an area, so long as they are consistent with the overall form and layout of their surroundings. | |
| **DP4: The design process** | | |
| 1. | Design quality should be considered throughout the evolution, assessment and delivery of development proposals, including through any pre-application engagement; as outlined in Part 2 of the Design and Placemaking planning practice guidance. | **Application Document 7.17 Strategic Options Report Including Needs Case** sets out why the Project is needed and what strategic options were considered to meet the identified need case, taking account of environmental, technical, cost and socio-economic considerations including specific characteristics of the site's wider context and the character of the surrounding area, amenity, existing uses, transport and access in accordance with this policy.<br>Following the selection of the strategic option, **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** and **Application Document 7.19 Supplementary Corridor and Routeing Report** explain how the routeing and siting of the Project was undertaken and the reasons for the selection of the emerging preferences which were consulted upon during two non-statutory consultations. These appraisals took into account the existing context and potential impacts relating to landscape and visual, ecology, flood risk, historic environment, settlement and population, tourism and recreation and current planning applications, alongside technical and cost consideration. |
| 2. | The local planning authority should:<br>a. Ensure that they have access to, and encourage the appropriate use of design review and other design tools and processes (especially for strategic sites and other significant projects), and take into account their outcomes, including any design recommendations made by design review panels;<br>b. Ensure that relevant planning conditions refer to clear and accurate plans and drawings which provide visual clarity about the design of the development, including the approved use of materials where appropriate; and | |

| Para | NPPF Policy Requirement | Project Compliance |
|---|---|---|
| | c. Not allow the quality of approved development to be materially diminished between permission and completion, as a result of changes proposed following its initial approval (for example through changes to approved details). | Following feedback from the non-statutory consultations and further design development, **Application Document 7.20 Design Development Report - 2025** set out the defined proposal developed following the non-statutory consultations, which was put forward to statutory consultation (18 February to 15 April 2025).<br>**Application Document 5.9 Design Development Report** summarises the design development and sets out how the design of the Project evolved from statutory consultation to the Project as applied for, taking into account feedback received from stakeholders.<br>**Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered** provides an overview of the main alternatives considered at each stage of the design development. |
| **TR6: Assessing transport impacts** | | |
| 1. | Development proposals that are likely to generate significant amounts of movement should be supported by:<br>a. A transport statement or transport assessment (depending on the extent and significance of the transport issues involved), which is proportionate to the nature and scale of the development, so that the likely impacts of the proposal for transport can be assessed and monitored; and<br>b. A travel plan, which indicates how sustainable transport objectives will be delivered, monitored and managed over time. | An assessment of the transport impacts of the Project is detailed in **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport**. **Application Document 7.15 Transport Assessment** also supports the Application, which concludes that the Project would not give rise to unacceptable impacts on highway safety or cause severe residual cumulative impacts on the road network in the AM and PM peak hour. Construction traffic effects are temporary, modest in absolute terms and dispersed across the network.<br>An Outline Construction Workforce Travel Plan is included within **Application Document 7.4 Outline Construction Traffic Management Plan** which sets out the principles, objectives and minimum requirements for managing construction workforce travel in a sustainable manner, and contribute to decarbonisation of the transport network. |
| 2. | Transport assessments and statements, and travel plans, should reflect the transport vision for the development and the transport strategy for the area in which it is located, and how these are intended to be achieved (including, in the case of travel plans, identifying fallback options if initial measures do not deliver the expected outcomes). | |
| 3. | In assessing movement patterns and potential impacts, including whether they are considered to be severe, reasonable future scenarios should be considered, taking into account impacts at relevant times of the day, potential cumulative impacts, multimodal trip generation and the promotion of sustainable modes of travel, and realising the transport vision for the development itself. Development proposals should be considered having regard to these potential impacts and the other policies in this Framework which are relevant (including TR3, TR4 and DP3(2)(d)). | The assessment of effects reported in **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport**, **Application Document 6.14.A5 Appendix 14.5 Construction Effects Summary** and **Application Document 7.15 Transport Assessment** has considered reasonable future scenarios, including relevant times of the day and cumulative impacts As well as measures to encourage active travel and more sustainable modes of travel as set out in **Application Document 7.4 Outline Construction Traffic Management Plan**. Details of control and management measures, including those relating to construction staff travel movements, are set out within **Application Document 7.4 Outline Construction Traffic Management Plan**.<br>Consideration of a modal shift of freight from road to more environmentally sustainable alternatives has also been undertaken in **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport**. Engagement with the Canal and River Trust has confirmed that the use of canals would not be appropriate for construction traffic and the movement of materials. Therefore, the assessment considers the needs of freight, with construction trips to be taken by road. No significant effects are anticipated as a result of the construction traffic using road.<br>Heavy goods vehicle (HGV) movements will normally take place during the core working hours, and construction vehicles will be scheduled to arrive throughout the core working hours. The construction vehicle traffic movements will be managed though the monitoring and management mechanisms set out in **Application Document 7.4 Outline Construction Traffic Management Plan**. Given the robust arrangements that would be available to monitor and review these traffic movements, the comprehensive trip generation and distribution approach and the proposed mitigation measures, a cap on HGV numbers is not considered necessary.<br>As demonstrated by the assessment in **Application Document 7.15 Transport Assessment** and reported in **Application Document 6.14.A15 Appendix 14.5 Construction Effects Summary**, there would be no unacceptable impact on highway safety or adverse cumulative effects as a result of the Project when compared with other committed developments in isolation or combined. |
| 4. | Development proposals should be refused if they would have a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety; taking into account any mitigation measures proposed as well as any wider network improvements, including measures to support sustainable patterns of movement. This applies both during the construction phase and following completion. | |

| Para | NPPF Policy Requirement | Project Compliance |
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| **TR8: Public rights of way** | | |
| 1. | Development proposals should:<br>a. Protect and enhance the network of public rights of way, including through suitable diversions agreed with the highway authority; and<br>b. Take opportunities to extend, link or improve the quality of existing routes where this enables one or more of the following:<br>i. Improved access to green spaces and the countryside;<br>ii. New direct and circular routes and connections between local and long-distance footpaths, bridleways and cycle routes;<br>iii. The provision of accessible, safe and convenient links to services and facilities; and<br>iv. Improved connections with public transport stops and interchanges. | The Project will not lead to any permanent closure or diversion of any existing PRoW. **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** sets out that while there are anticipated closures and diversions of PRoW, these are temporary in nature. The diverted routes are anticipated to be primarily used for recreational purposes, with the proposed diversions offering a comparable recreational experience to the existing routes with similar character and amenity value for users. No significant effects are anticipated on any PRoW in the Traffic and Transport assessment as a result of closures of diversions.<br>National Grid have also engaged extensively with Local Highways Authorities to reach a position of agreement in terms of PRoW closures and appropriate management measures. **Application Documents 5.8.6 to 5.8.8 Statements of Common Ground** set out details of ongoing engagement with these highways authorities.<br>The Project commits to control and management measures during construction to minimise potential impacts, as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, , **Application Document 7.6 Outline Public Rights of Way Management Plan** and **Application Document 7.2 Outline Code of Construction Practice**. These include (but are not limited to):<br>• Maintaining access to community facilities, businesses, tourism assets and recreational areas where practicable when they fall within the Order Limits. Where PRoW closures are unavoidable, appropriate temporary access arrangements will be provided, including diversions with advance notice signage, ensuring that affected users are clearly informed of changes before and throughout the construction period.<br>• Avoiding the closure of The Yorkshire Wolds Way for users for the duration of construction works associated with the Project, including implementing a suitable and proportionate crossing provision following agreement with the LPA PRoW officer.<br>• Managing PRoW crossing working areas in discussion with the relevant local authorities and applications for any temporary closures would be discussed with the relevant local authority. Access disruption will be minimised, where practicable and safe, while construction activities occur. Any required temporary diversions will be clearly marked at both ends with signage explaining the diversion, the duration of the diversion and a contact number for any concerns.<br>• PRoWs will be managed in accordance with the PRoW Management Plan which will be developed in accordance with **Application Document 7.6 Outline Public Rights of Way Management Plan**. |
| **P2: Ground conditions** | | |
| 1. | Sites proposed for development should be suitable for their proposed use taking into account:<br>a. Ground conditions, including any risks arising from land instability or contamination (whether due to natural hazards or current and former activities such as mining or fuel storage); and<br>b. The extent to which any such risks can be mitigated, and the potential impacts on the natural environment arising from remediation. | **Application Document 6.12 Environmental Statement Chapter 12 Geology and Hydrogeology** sets out the potential effects of the Project on geological and hydrogeological receptors including contaminated land. A contamination preliminary risk assessment has also been undertaken and presented in **Application Document 6.12.A2 Environmental Statement Appendix 12.2 Preliminary Contamination Risk Assessment**.<br>As set out in **Application Document 7.3 Register of Environmental Actions and Commitments** embedded measures have been intrinsic to the design of the Project to avoid and reduce significant adverse effects. The Project has been designed with sensitive routeing and siting of infrastructure and temporary works to avoid potentially contaminative sites such as landfills, and sensitive features (such as SPZ 1s) where practicable. Control and management measures are also proposed and set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application** |
| 2. | Where land is remediated it should, as a minimum, not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990. | |
| 3. | Adequate site assessment information, prepared by a competent person, should be available to inform these considerations. | |

| Para | NPPF Policy Requirement | Project Compliance |
|---|---|---|
| 4. | Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner. | **Document 7.3 Register of Environmental Actions and Commitment** which will be secured by **Application Document 3.1 Draft Development Consent Order**.<br>**Application Document 6.12.A2 Environmental Statement Appendix 12.2 Preliminary Contamination Risk Assessment** concludes that the majority of the Order Limits is indicated to have remained as undeveloped/agricultural land since the earliest reviewed historical mapping. Therefore, in these areas it is considered that there is a very low risk of a significant source of potential contamination. There are discrete areas within the 250 m study area for the Project where either the historical land use or the current land use have been identified as potentially contaminative.<br>However, following the implementation of embedded and control and management measures proposed in **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.2 Outline Code of Construction Practice**, the Preliminary Risk Assessment (PRA) concludes that there is a low risk of exposure to any existing contamination through ground disturbance. Therefore, it is considered that the temporary construction impacts from exposure to existing contamination for human health receptors, and groundwater and groundwater receptors would result in an overall negligible effect, which would be not significant. As committed to in **Application Document 7.3 Register of Environmental Actions and Commitments** the PRA will be reviewed once the detailed design of the Project is available to ensure that the assumptions made within the risk assessment are still valid (i.e. that the Project does not disturb any of the sites identified within the PRA). |
| **P3: Living conditions and pollution** | | |
| 1. | Development proposals should be appropriate for their location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, whether these effects are on or off-site; and whether this is as a result of the development itself or the product of preexisting conditions in its vicinity. In assessing the potential effects of pollution, consideration should be given to the potential sensitivity of the site, and its intended occupiers and users, as well as that of the environment and population in the surrounding area (including where certain groups could be particularly vulnerable to its effects, such as children and older people). | The location and design of the Project is the result of a comprehensive site selection process that was led by the consideration of good design and key environmental and planning constraints to avoid and minimise impacts as early as possible. **Application Document 5.9 Design Development Report** explains where design choices have sought to reduce the environmental effects of the Project and demonstrates that the design has incorporated embedded mitigation to avoid or reduce significant environmental effects where practicable. **Application Document 7.3 Register of Environmental Actions and Commitments** details the embedded measures and additional mitigation measures that have been identified through the Environmental Impact Assessment to avoid or reduce likely significant environmental effects. |
| 2. | Within this context development proposals should:<br>a. Provide healthy living conditions for occupiers and users in terms of adequate access to light and avoiding exposure to levels of air, noise, artificial light or other sources of pollution which could have an unacceptable adverse effect on health and the quality of life. Where necessary suitable mitigation measures should be incorporated to secure acceptable living conditions;<br>b. Not give rise to, or contribute to, an unacceptable level of access to daylight and sunlight for neighbouring residents and occupiers, or unacceptable levels of air, noise, artificial light, water, soil or other forms of pollution on or beyond the site. Adverse impacts of this nature should be avoided where possible, or else mitigated to an acceptable degree. Where possible, opportunities should be taken to reduce pollution affecting the wider area (such as through traffic and travel management or improved external lighting);<br>c. Sustain and contribute to compliance with relevant limit values or national objectives and targets for air pollutants including PM2.5. Development proposals should take account of Air Quality Management Areas and be consistent with the objectives of relevant Air Quality Action Plans, Clean Air Plans and Local Air Quality Strategies;<br>d. Mitigate and reduce to a minimum potential adverse impacts resulting from noise, not result in levels of noise exposure which would have a significant observed adverse effect, and maintain the character of tranquil areas (those areas that have remained relatively | **Application Document 6.15 Environmental Statement Chapter 15 Air Quality** provides an assessment of the likely effects on air quality that could result from the construction of the Project. The assessments conclude that during construction the effects on air quality from vehicle emissions would be negligible and therefore not significant. The assessment also concludes that the effects on air quality from construction plant and equipment emissions, including Non-Road Mobile Machinery (NRMM) will not be significant. The construction dust assessment concludes that the effects of construction dust for human and ecological receptors would not be significant.<br>**Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration** presents an assessment of the likely significant noise and vibration effects that could arise from the Project. The assessment concludes that residual adverse effects from construction noise upon sensitive receptors can be avoided through the implementation of Best Practice Measures (BPM). As set out in **Application Document 7.7 Outline Noise and Vibration Management Plan (NVMP)** and committed to in **Application Document 7.3 Register of Environmental Actions and Commitments**, the Main Works Contractor(s) will conduct further detailed construction noise and vibration assessments based on their specific construction methodologies. An assessment of construction traffic noise is provided in **Application Document Environmental Statement 6.16.A4 Environmental Statement Appendix 16.4 Construction Traffic Noise and Vibration Assessment**. The assessment has considered construction traffic noise on the public highway and on construction access tracks. The assessment of construction traffic on the public highway |

| Para | NPPF Policy Requirement | Project Compliance |
|---|---|---|
| | undisturbed by noise from human sources and are prized for their recreational and amenity value for this reason);<br>e. Limit any adverse impact from artificial light on local amenity, intrinsically dark landscapes (those areas entirely, or largely, uninterrupted by artificial light) and nature; and<br>f. Assess and mitigate impacts where the development could have an unacceptable adverse effect on water quality, especially in relation to sensitive water bodies such as chalk streams. | concludes that whilst an increase in noise level is expected (calculated to be 3.3 dB), both the baseline traffic flow (1,059 vehicles per day) and the traffic flow with construction traffic (1,306 vehicles per day) are low, resulting in low overall traffic noise levels. Taking account of both the magnitude of change and the resultant absolute noise levels, the effect is not considered to be significant. The assessment of construction traffic on construction access tracks concludes that construction traffic noise would be below the SOAEL at all nearby NSRs for all construction access tracks. As such, significant adverse effects from noise from construction traffic on the construction access tracks are not expected. |
| 3. | In applying this policy, it should be assumed, unless there is clear evidence to the contrary, that separate regulatory regimes for the control of pollution will operate effectively, as set out in policy DM7. This means that it will be appropriate to take into account emissions limits set through those other regimes. | An assessment of artificial light emissions has been undertaken to determine where the Project may have adverse effects on local amenity and human receptors. The proposed temporary lighting requirements for the Project are described in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project** and subject to assessment in **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**.<br>Exterior and interior lighting would be provided at construction sites and compounds to allow for safe movement and the operation of equipment. All lighting would be designed in accordance with the appropriate design standards and be motion-sensor activated. A typical construction day would consist of 12 hours, which in winter would require working in the dark at either end of the day. For the purposes of the ES, it is therefore assumed that winter working would require lighting at certain sites, but this would not apply Project-wide. Following the implementation of these proposed standard mitigation measures, the temporary residual effects of construction lighting are not anticipated to be significant.<br>There is also potential for the surface water quality to deteriorate from receiving silted runoff; however, the control and management measures set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments** would safeguard water quality, reducing pollution risks and potential negative effects of the temporary watercourse crossings. These measures would also avoid detrimental impacts to the flow regimes of watercourse and local drainage regimes, ensuring no detrimental impact on sites designated for nature conservation. As such, no significant effects are anticipated on the water quality attributes of watercourses. |
| **F5: The sequential test** | | |
| 1. | The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Where the test applies, development proposals should not be located in areas at risk of flooding where alternative sites, appropriate for the development, are reasonably available in areas with a lower risk of flooding. The area to which the test is applied should not be greater than the anticipated catchment of the development in terms of its likely occupiers or users. | **Application Document 7.13 Flood Risk Assessment** has been prepared which assesses whether the Project is likely to be at risk of flooding or is likely to increase flood risk elsewhere.<br>The FRA concludes that from the outset of the Project, a sequential approach has been taken to siting infrastructure for the Project, particularly those elements that are vulnerable to inundation, as evidenced in **Application Document 7.17 Strategic Options Report Including Needs Case**. The water environment and flood risk were considered in the early stages of siting and design and embedded measures have been intrinsic to the design of the Project to reduce and where possible avoid flood risks and impacts on the water environment. Embedded mitigation measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, which is secured by **Application Document 3.1 Draft Development Consent Order**.<br>During construction, the FRA concludes that following the application of a sequential approach and a lack of proximate feasible alternatives as detailed in **Application Document 7.17 Strategic Options Report Including Needs Case**, three construction compounds are located in Flood Zone 3, in addition to some temporary haul roads and construction access which must necessarily be located in Flood Zones 2 and 3. The FRA concludes, however, that these risks would be reduced and managed by implementing a range of mitigation measures set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of** |
| 2. | The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, other than for:<br>a. Sites allocated in the development plan which were subject to the sequential test during plan preparation;<br>b. Sites where a site-specific flood risk assessment demonstrates clearly that:<br>i. No built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk); or | |

| Para | NPPF Policy Requirement | Project Compliance |
|---|---|---|
| | ii. Where the site would be at risk of surface water flooding only, the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development without increasing flood risk elsewhere in accordance with policy F7. | **Environmental Actions and Commitments**, including those detailed in a Flood Warning and Evacuation Plan, and by programming construction activities in floodplains to avoid periods of likely high river levels where practicable. Following the implementation of these measures, the residual risk is medium for fluvial and tidal flooding, and low for surface water and groundwater flooding. Overall, the construction of the Project results in no significant effects in relation to flood risk, as set out in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**.<br>During operation, due to its linear nature and the geographical extent of the Project, while the siting of pylons within the defended floodplain has largely been avoided along the Project route due to the sequential approach to siting infrastructure, some operational Project components, namely pylons, must necessarily be located in Flood Zones 2 and 3 with some areas being within the floodplain. Therefore, the exception test is triggered. The FRA provides the evidence of how the Project satisfies this test. The FRA concludes that, with regard to the exception test, the Project is a Nationally Significant Infrastructure Project that would play an important role in delivering renewable electricity efficiently, reliably and safely and would support the UK's move towards net zero, therefore it would provide wider sustainability benefits to the community that outweigh flood risk.<br>In addition, permanent Project infrastructure which lie within areas at risk of fluvial or tidal flooding only comprise a small number of pylons. These pylons are resilient to flooding, given their concrete bases and metal lattice structures which would not be impacted by floodwaters, and so ensure the Project would be safe and could continue to operate in times of flood. A suite of measures would be adopted, as described in Table 3.1 of **Application Document 7.13 Flood Risk Assessment** and also set out in **Application Document 7.3 Register of Environmental Actions and Commitments** which is secured by **Application Document 3.1 Draft Development Consent Order**, to prevent flood risk increases during operation of the Project.<br>Details of the surface water drainage systems will be confirmed during the detailed design stage of the Project as secured by **Application Document 3.1 Draft Development Consent Order**. In accordance with the requirement, National Grid will submit a surface water management plan prepared substantially in accordance with the framework construction surface water management plan (Appendix B of the **Application Document 7.13 Flood Risk Assessment**).<br>Following consultation with the Environment Agency in accordance with paragraph 5.8.18 to 5.8.20 of NPS EN-1, it was stipulated that compensatory storage for pylons within the floodplain would be required. Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 Flood Risk Assessment** sets out the proposed location of floodplain storage compensation areas that are proposed on land outside of the floodplain.<br>The flood storage compensation proposals outlined in Appendix A Flood Compensation Storage Technical Note provide evidence that the Project, on the implementation of flood compensation areas within the same floodplain cell, will not increase the overall water level and therefore does not increase flood risk elsewhere. Furthermore, a conservative approach to calculating floodplain storage losses was taken, meaning the suggested volume for compensation areas likely exceeds the requirement. As such, there is the opportunity for the Project to reduce flood risk overall via these floodplain storage compensation areas. This is in accordance with paragraph 5.8.41 of NPS EN-1.<br>It is therefore concluded that during the operational phase, the Project is considered to be at low risk of flooding from all sources assessed due to the mitigation measures built into its design. The Project is not anticipated to increase flood risk elsewhere during its operation as any losses of floodplain storage would be compensated for. New impermeable surfaces would be very localised to pylon bases and rainfall runoff from these areas would be attenuated by surrounding reinstated vegetation and would soak back into the ground.<br>The exception test is therefore concluded to be satisfied, as the Project would bring significant benefits via its delivery of safe, reliable, and renewable electricity; would not result in an increase in flood risk elsewhere; and has been designed to be resilient to flooding throughout its lifetime. |

| Para | NPPF Policy Requirement | Project Compliance |
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| **F6: Development in areas at risk of flooding from rivers of the sea** | | |
| 1. | In areas falling within flood zones 2, 3a, or 3b (as defined in Annex F, table 1):<br>a. Development proposals should be refused if the use is incompatible with the risk from river or sea flooding, as set out in Annex F, table 3; and<br>b. In certain other circumstances set out in Annex F, table 3, in addition to satisfying the sequential test in policy F5 where applicable, development will only be appropriate where an 'exception test' is satisfied. The exception test involves demonstrating that the development would meet all the following criteria:<br>i. Provide wider sustainability benefits to the community that outweigh the flood risk;<br>ii. Be safe for its anticipated lifetime in accordance with policy F7; and<br>iii. Not increase flood risk elsewhere and, where possible, reduce flood risk overall. | The FRA provides the evidence of how the Project satisfies this test. The FRA concludes that, with regard to the exception test, the Project is a Nationally Significant Infrastructure Project that would play an important role in delivering renewable electricity efficiently, reliably and safely and would support the UK's move towards net zero, therefore it would provide wider sustainability benefits to the community that outweigh flood risk.<br>In addition, permanent Project infrastructure which lie within areas at risk of fluvial or tidal flooding only comprise a small number of pylons. These pylons are resilient to flooding, given their concrete bases and metal lattice structures which would not be impacted by floodwaters, and so ensure the Project would be safe and could continue to operate in times of flood. A suite of measures would be adopted, as described in Table 3.1 of **Application Document 7.13 Flood Risk Assessment** and also set out in **Application Document 7.3 Register of Environmental Actions and Commitments** which is secured by **Application Document 3.1 Draft Development Consent Order**, to prevent flood risk increases during operation of the Project.<br>Following consultation with the Environment Agency in accordance with paragraph 5.8.18 to 5.8.20 of NPS EN-1, it was stipulated that compensatory storage for pylons within the floodplain would be required. Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 Flood Risk Assessment** sets out the proposed location of floodplain storage compensation areas that are proposed on land outside of the floodplain.<br>The flood storage compensation proposals outlined in Appendix A Flood Compensation Storage Technical Note provide evidence that the Project, on the implementation of flood compensation areas within the same floodplain cell, will not increase the overall water level and therefore does not increase flood risk elsewhere. Furthermore, a conservative approach to calculating floodplain storage losses was taken, meaning the suggested volume for compensation areas likely exceeds the requirement. As such, there is the opportunity for the Project to reduce flood risk overall via these floodplain storage compensation areas. This is in accordance with paragraph 5.8.41 of NPS EN-1.<br>It is therefore concluded that during the operational phase, the Project is considered to be at low risk of flooding from all sources assessed due to the mitigation measures built into its design. The Project is not anticipated to increase flood risk elsewhere during its operation as any losses of floodplain storage would be compensated for. New impermeable surfaces would be very localised to pylon bases and rainfall runoff from these areas would be attenuated by surrounding reinstated vegetation and would soak back into the ground.<br>The exception test is therefore concluded to be satisfied, as the Project would bring significant benefits via its delivery of safe, reliable, and renewable electricity; would not result in an increase in flood risk elsewhere; and has been designed to be resilient to flooding throughout its lifetime. |
| 2. | The application of the exception test should be informed by a site-specific flood risk assessment. The exception test does not need to be applied:<br>a. To those forms of development, or in those circumstances, where the sequential test is not required, as set out in policy F5; or<br>b. Where development is proposed on a site allocated in the development plan to which the exception test was applied at the plan-making stage, unless there has been a significant increase in the risk of flooding to the site subsequently, or the nature of the development itself has changed significantly from that which was allocated so as to introduce a more vulnerable use (having regard to Annex F, table 2). | |
| **F7: Ensuring development is safe from flooding** | | |
| 1. | Development proposals should not present a risk from flooding to potential occupiers, users, or visitors, and should not increase flood risk elsewhere. | As set out above and in **Application Document 7.13 Flood Risk Assessment**, the Project is considered to be at low risk of flooding from all sources assessed due to the mitigation measures built into its design. The Project is not anticipated to increase flood risk elsewhere during its operation as any losses of floodplain storage would be compensated for. New impermeable surfaces would be very localised to pylon bases and rainfall runoff from these areas would be attenuated by surrounding reinstated vegetation and would soak back into the ground.<br>The Project would bring significant benefits via its delivery of safe, reliable, and renewable electricity; would not result in an increase in flood risk elsewhere; and has been designed to be resilient to flooding throughout its lifetime. |
| 2. | Where development is proposed in a location known to be at risk from any form of flooding, now or in the future, it should be refused unless:<br>a. Within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons which justify a different arrangement;<br>b. The development will be safe throughout its lifetime taking account of the vulnerability of its users;<br>c. Any residual risk can be safely managed, and safe access and escape routes are included where appropriate, as part of an agreed emergency plan; | |

| Para | NPPF Policy Requirement | Project Compliance |
|---|---|---|
| | d. The development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment; and<br>e. It can be demonstrated that flood risk will not be increased elsewhere. | |
| **F8: Sustainable drainage systems and watercourses** | | |
| 1. | Development proposals which could affect drainage on or around the development site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, in ways which are proportionate to the nature and scale of the proposal. The systems employed should provide multifunctional benefits where possible, facilitating improvements in water quality, biodiversity and amenity. | As set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, which is secured by **Application Document 3.1 Draft Development Consent Order**, Temporary infrastructure such as construction compounds, lay down areas (as well as areas where impermeable material will be installed or where heavy equipment would be used) and construction access tracks would be drained using sustainable drainage systems (SuDS) techniques that are suitable for local ground conditions and topography and which are designed to accommodate a 1 in 10-year (10% Annual Exceedance Probability) event, plus a 40% allowance for climate change resilience. These areas will be reinstated after completion of the temporary works, as agreed with the landowner. The design and proposals for SuDS will be confirmed during the detailed design phase of the Project. |
| 2. | Sustainable Drainage Systems should:<br>a. Be designed in accordance with the National Standards for Sustainable Drainage Systems;<br>b. Have maintenance arrangements in place to ensure an acceptable standard of operation for the anticipated lifetime of the development; and<br>c. In the case of proposals for major development, take account of advice from the Lead Local Flood Authority. | |
| 3. | Development proposals should not enclose existing watercourses where this is not already the case, unless there are compelling reasons to do so; and should where possible remove existing culverts and renaturalise existing river channels, unless to do so would increase flood risk, result in other environmental harm or cause harm to heritage assets. | The Project would not permanently enclose any existing watercourse. During construction, access crossings would be required. As set out in **Application Document 7.3 Register of Environmental Actions and Commitments** where possible the design of the temporary haul roads has sought to utilise existing bridges and culverts in order to avoid physical disturbance, impacts on flow regimes and pollution risks.<br>Where watercourses are to be crossed by construction traffic, measures to be applied include the use of temporary culverts or temporary clear span bridges. Once the temporary culvert is installed, the area above the temporary culvert will be backfilled and construction mats or stone placed over the backfilled area to permit the passage of plant, equipment, materials and people. Temporary culverts will be as short as practicable and will be kept free from debris. Culverts will be sized to convey flows generated by upstream catchments to maintain the current land drainage regime and during culvert installation, downstream flows would be maintained.<br>The proposed watercourse crossings for construction access are detailed in **Application Document 6.4.A2 Appendix 4.2 Bridge and Culvert Schedule** and the third-party works in **Application Document 6.4.A4 Appendix 6.4 Third Party Crossing Schedule.**<br>**Application Document 6.11 Environmental Statement Chapter 11 Water Environment** concludes that there would be no significant effects as a result of temporary culverts across watercourses, and the design of temporary crossings would reduce temporary effects on the watercourses' flow regimes and channel forms. |
| **N2: Improving the natural environment** | | |
| 1. | To contribute positively to the natural environment, and support nature's recovery, development proposals should:<br>a. Consider the environmental qualities of land proposed for development, including habitats, landscape character and the natural beauty of the countryside, and identify opportunities for those qualities to be conserved or enhanced (including through requirements for biodiversity net gain where these apply);<br>b. Take into account the quality of agricultural land (including that classified as best and most versatile agricultural land, and its grade), and if significant development of agricultural land is necessary, use areas of poorer quality land where possible; | In accordance with criteria (a) of Policy N2 paragraph 1, the location and design of the Project is the result of a comprehensive site selection process that was led by the consideration of good design and key environmental and planning constraints to avoid and minimise impacts as early as possible. **Application Document 5.9 Design Development Report** explains where design choices have sought to reduce the environmental effects of the Project and demonstrates that the design has incorporated embedded mitigation to avoid or reduce significant environmental effects where practicable. **Application Document 7.3 Register of Environmental Actions and Commitments** details the embedded measures and additional mitigation measures that have been identified through the Environmental Impact Assessment to avoid or reduce likely significant environmental effects. |

| Para | NPPF Policy Requirement | Project Compliance |
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| | c. Take suitable opportunities to connect to and strengthen ecological networks that extend beyond the site, drawing on the measures proposed by Local Nature Recovery Strategies, National Forest Strategies and Community Forest Plans, where present, and other relevant assessments;<br>d. Conserve and enhance existing natural features of visual, historic or nature conservation value (such as established trees and hedgerows) where possible; and use appropriate landscaping to help create a well-designed place and integrate the development into its surroundings;<br>e. Use green infrastructure provided as part of the scheme and nature-based solutions to secure multiple benefits: such as for biodiversity; surface water and pollution management (including maintaining flow rates and water quality); climate change mitigation and adaptation, and recreation;<br>f. Minimise any adverse impacts on biodiversity and include features which support priority or threatened species such as swifts, bats and hedgehogs. Development proposals should incorporate integrated nest boxes (commonly known as swift bricks) into their construction unless there are compelling technical reasons which prevent their use, or would make them ineffective; and<br>g. Ensure that green infrastructure and other features to support nature are located and designed to minimise risk of future failure, and that appropriate measures are in place for any necessary long-term management. | As set out in **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**, embedded measures that are intrinsic to and built into the design of the Project have been incorporated from the outset to reduce and avoid landscape and visual impacts as far as practicable. Some significant effects are also anticipated on some landscape character types, and visual effects on communities and recreational receptors during construction; however, these are temporary, and construction impacts would be minimised as far as practicable in line with the commitments set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan Application Document 7.2 Outline Code of Construction Practice and Application Document 7.3 Register of Environmental Actions and Commitments**, which will be secured by **Application Document 3.1 Draft Development Consent Order.**<br>In accordance with criteria (b) of Policy N2 paragraph 1, **Application Document 6.13 Environmental Statement Chapter 13 Agriculture and Soils** provides an assessment of the effects of the Project on agricultural land. The Project is likely to have a significant adverse effect on BMV land during the construction and operation of the Project, with the permanent removal of 34.4 hectares of BMV land, amounting to 2.27% of agricultural land within the Order Limits. It is considered that although this effect would be significant and permanent, the benefits and urgent need of the Project in terms of providing sufficient capacity to the network in the North of England and Midlands, in order to facilitate the connection of planned renewable energy projects and help to deliver the UK's net zero target and the Clean Power 2030 mission, would outweigh this loss.<br>National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits as set out in **Application Document 7.1 Biodiversity Net Gain Report**. The Project proposes to address BNG requirements primarily through off-site habitat creation which will be secured through the purchase and allocation of registered off-site biodiversity units from suitably qualified biodiversity unit providers.<br>In accordance with criterion (c) of Policy N2 paragraph 1, the Project has taken suitable opportunities to connect to and strengthen strategic ecological networks extending beyond the Order Limits, drawing on the priorities of emerging Local Nature Recovery Strategies (LNRS). In particular, National Grid is also exploring opportunities to deliver BNG through habitat creation and enhancement within the Order Limits on land under its ownership or control where the habitats will not affect the operational requirements. Within the Order Limits and adjacent to Treswell Wood, a 12.17-hectare area (the BNG Opportunity Area) has been identified as a potential on-site BNG mitigation location, although acquisition and use for BNG are not yet confirmed. Strategically, the proposed woodland creation would contribute to local biodiversity priorities for hazel dormouse (Muscardinus avellanarius) as set out in the Nottinghamshire and Nottingham Local Nature Recovery Strategy, achieving High strategic significance. Functionally, the habitat would extend the existing Treswell Wood assemblage and strengthen ecological networks across the local landscape, improving permeability and resilience for woodland-associated species.<br>In accordance with criterion (d) of Policy N2 paragraph 1, the Project aims to conserve existing natural features of visual and nature conservation value, particularly established trees and hedgerows, wherever practicable, in accordance with **Application Document 7.3 Register of Environmental Actions and Commitments**. Where reasonably practicable, construction elements (such as working areas, accesses, laydown and temporary construction compounds) will be kept to the minimum required and micro-sited to avoid impacts on ecologically important features. Overseen and informed by the ECoW and ArbCoW, sensitive habitats will be demarcated to ensure contractors protect as much vegetation as possible.<br>As a general principle, all land which is temporarily impacted by the Project will be reinstated where practicable to its pre-construction condition land use. Furthermore, to satisfy the landscaping and integration objectives of **criterion (d)**, 'mitigation planting areas' are incorporated across key locations throughout the Project. The locations of these areas are illustrated on **Application** |
| 2. | If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated or, as a last resort, compensated for, then the development should be refused. | |
| 3. | Development proposals may incorporate biodiversity enhancements which exceed the statutory objective for biodiversity net gain, but this should only be a requirement where it is set out in up-to-date development plan policies for specific site allocations. Decisionmakers should not give weight to other development plan policies which require biodiversity gains which go beyond the statutory framework, including where a policy requires gains for development proposals which are exempt. | |

| Para | NPPF Policy Requirement | Project Compliance |
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| | | **Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design** and Table 8.2 of **Application Document 7.8 Outline Landscape and Ecology Management Plan** sets out a list of the mitigation planting areas proposed within the Order Limits.<br>The habitats to be created and/or enhanced in these areas (on-site mitigation) have been designed to provide landscape and visual mitigation while also offering ecological value. Along the proposed overhead line, 60 landscape mitigation planting areas have been identified within the Order Limits to provide landscape and visual mitigation, whilst also delivering ecological benefits as set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan**. Indicative landscape proposals for each of these areas are shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.<br>In accordance with criterion (e) of Policy N2 paragraph 1, green and blue infrastructure features and nature-based solutions provided across the Project are designed to secure multiple environmental benefits:<br>**Surface water and pollution management:** As set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, temporary haul road design seeks to utilise existing bridges and culverts where possible to avoid physical bed disturbance, pollution risks, and impacts on natural flow regimes. Where watercourses must be crossed, temporary culverts or temporary clear-span bridges will be installed to maintain downstream flows and preserve existing catchment drainage regimes. In addition, Sustainable Drainage Systems (SuDS) and silt management controls secured under **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.13 Flood Risk Assessment** ensure baseline flow rates and water quality are maintained.<br>**Biodiversity and climate change mitigation/adaptation:** Reinstated hedgerows, extensive native tree planting, and dedicated faunal habitat areas (including water vole and otter mitigation areas) bolster local carbon stores and enhance ecological resilience against climate extremes.<br>**Recreation:** Public rights of way and active travel corridors (including the Trans Pennine Trail and NCN Route 65) will be safeguarded via managed crossings and safe temporary diversions secured under **Application Document 7.6 Outline Public Rights of Way Management Plan**, ensuring ongoing recreational access and amenity throughout the works.<br>Following the implementation of embedded, control and additional mitigation measures, **Application Document 6.8 Environmental Statement Chapter 8 Ecology and Application Document 6.9 Environmental Statement Chapter 9 Ornithology** conclude that the Project, based on the current design as set out in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project**, avoids residual significant adverse impacts on all international and national and local statutory designated sites for nature conservation including SSSIs, non-statutory designated sites, priority habitats, important hedgerows and other terrestrial habitats.. This has been achieved by following the mitigation hierarchy with the design process, and in accordance with the Holford Guidance, to avoid impacts where possible.<br>It should be noted that this conclusion is based on the assessment surveys that have been undertaken thus far for the Project. Additional 2026 surveys are currently continuing, and any additional assessment results would be provided in addendum reports following submission of the DCO.<br>**Application Document 6.8 Environmental Statement Chapter 8 Ecology** concludes that there would be a residual significant adverse effect on Yellow birds-nest, which is a wildflower, due to the permanent loss of plants due to pylon working areas (pylons 4ZQ78 and 4ZQ77), access, stringing works, and overhead line clearance (between 4ZQ78 and 4ZQ76) requiring felling and management of trees within woodland at or in the vicinity of the top of Bilks Hill, and therefore the associated fungal network that the plant is dependent on. As noted above and in Table 8.21 of **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, mitigation is proposed to ensure there would be no direct effects or encroachment on yellow bird's nest, however residual significant effects remain due to impacts to the fungal network that the flower relies on. The overriding public |

| Para | NPPF Policy Requirement | Project Compliance |
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| | | benefits and need for the Project are considered to outweigh this harm. There would be no other significant adverse effects on any other species or protected species, including all bird species.<br>It is also noted that if the LoD are used during construction near Jillywood Lane LWS, then habitats could be impacted in two locations. This would result in a significant adverse effect because the LWS has been recorded by the Project as containing Woodland with Characteristics of Ancient Woodland. Therefore, as a worst case, this habitat is considered irreplaceable. If the LoD is used, and trees are required to be removed at Jillywood Lane LWS, mitigation set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments** would ensure that any trees removed will not be removed to below ground level and not grubbed out to reduce the impact to soil and ground flora. Compensation would also be provided via new trees to be planted in proposed mitigation planting areas, outside the LWS, which are described in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and shown in **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.<br>A significant residual adverse effect is also anticipated on Socken Wood and Wood Farm Woodlands with Characteristics of Ancient Woodland. Additionally, if the LoD are used in one area, a significant residual effect is anticipated on one veteran tree.<br>National Grid considers that it has applied the mitigation hierarchy appropriately in designing the Project to avoid or reduce as far as possible, adverse effects on irreplaceable habitats. The location, routeing and siting of the Project has been designed to avoid and/or reduce impacts on designated ancient woodland and veteran trees as far as practicable.<br>It is acknowledged that significant effects are reported on some areas of Woodlands with Characteristics of Ancient Woodland, which would result in the loss or deterioration of irreplaceable habitats at Socken Wood and Wood Farm. Mitigation is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan and Application Document 7.3 Register of Environmental Actions and Commitments** to ensure that impacts are reduced as far as practicable, and compensation planting with a ratio of 3:1 is proposed and is secured in **Application Document 7.8 Outline Landscape and Ecology Management Plan**.<br>As the design currently stands and should the LoD not be used in Route Section A, the Project would not result in the loss or deterioration of any designated (on the AWI) ancient woodland or trees, or veteran trees. In the event that the LoD is used and the loss of one veteran tree is required, compensation planting (with a replanting ratio of 30:1) would be implemented as secured in **Application Document 7.3 Register of Environmental Actions and Commitments** and agreed with Natural England and East Riding of Yorkshire Council.<br>Mitigation and compensation planting (ratio of 3:1) is also proposed if the Project would result in the loss or deterioration of Woodland with Characteristics of Ancient Woodland within Jillywood Lane LWS (if the LoD are used in this location). These are secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Therefore, in accordance with paragraph 5.4.55 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) it is considered that the overriding public need and benefit of the Project (as set out in sections 3 and 7.5 of the **Application Document 5.5 Planning Statement**) would clearly outweigh the loss or deterioration of the habitat, and it would therefore be wholly exceptional. In addition, a relevant compensation strategy is provided within the Order Limits for potential impacts as far as possible and is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**. |

| Para | NPPF Policy Requirement | Project Compliance |
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| **N3: Trees in new development** | | |
| 1. | In recognition of the benefits which trees can provide for biodiversity, climate change mitigation and adaptation, and the character and quality of the built environment, development proposals should:<br>a. Make new streets tree-lined (unless there are strong reasons why this would be inappropriate in specific streets), and incorporate trees in other suitable locations, such as in parks and through the provision of community orchards;<br>b. Ensure that the selection of species and their placement is compatible with highways and other infrastructure requirements and the needs of different users of public spaces; and will be effective in helping to adapt to the effects of climate change and delivering other environmental benefits. Suitable arboricultural advice should be sought, and proposals discussed with highways and trees officers where necessary, so that the right trees are planted in the right places; and<br>c. Make provision for the long-term maintenance of both existing and newly-planted trees which form part of the development. | As set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** as a general principle, all land which is temporarily impacted by the Project will be reinstated where practicable to its pre-construction condition land use. The only exception to this will be restrictions on tree planting below the proposed overhead line and directly on top of the underground cables for third party modifications. Species mixes will allow for low growing and shallow rooted tree/scrub species as an alternative in these locations. Reinstatement planting would need to be in accordance with the detailed Landscape and Ecology Management Plan which would be substantially in accordance with **Application Document 7.8 Outline Landscape and Ecology Management Plan.** The plan sets out details of timing, species mix and good practice measures to ensure planting is compatible with highways and other infrastructure requirements and the needs of different users of public spaces; and will be effective in helping to adapt to the effects of climate change and delivering other environmental benefits.<br>In addition to the reinstated habitats across the route, there will also be 'mitigation planting areas' located in key locations through the Project. The locations of these areas are detailed within **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**. The habitats to be created and/or enhanced in these areas (on-site mitigation) have been designed to provide landscape and visual mitigation while also offering ecological value.<br>Details of the implementation, monitoring and maintenance of tree planting are set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan.** Monitoring and reporting will ensure that the functions documented in the Landscape and Ecology Mangement Plan (LEMP) are being achieved and to determine whether any remedial management action may be required. A post-construction monitoring programme and reporting procedures will be formalised, agreed with the relevant planning authority and included within the Final LEMP, prior to construction works commencing. |
| **N6: Areas of particular importance for biodiversity** | | |
| 1. | To support the conservation of important habitats, species and sites of geodiversity value, development proposals affecting:<br>a. A site of international importance, which for the purpose of this policy is a habitats site, should be refused unless:<br>i. An appropriate assessment has concluded that the proposal will not adversely affect the integrity of the site (either individually or in combination with other developments), or the proposal can satisfy the derogation tests; and/or<br>ii. The impact of development on the relevant protected features of the protected site is being addressed through an Environmental Delivery Plan which has been made and the developer has committed to paying the nature restoration levy.<br>b. A site of national importance, which for the purpose of this policy is one designated as a Site of Special Scientific Interest, should only be supported if:<br>i. There would be no adverse effect (either individually or in combination with other developments) on the site's features of special scientific interest; or<br>ii. The benefits of the development in the location proposed clearly outweigh both the likely impact on the features of special scientific interest, and any broader impact on the national network of Sites of Special Scientific Interest; or<br>iii. The impact of development on the relevant protected feature of the protected site is being addressed through an Environmental Delivery Plan which has been made and the developer has committed to paying the nature restoration levy. | The Appropriate Assessment in **Application Document 5.2 Habitats Regulations Assessment Report** concludes that the Project (either alone or in-combination with other plans or projects) would not result in an adverse effect on the integrity of a European site following the implementation of mitigation.<br>Following the implementation of embedded, control and additional mitigation measures, **Application Document 6.8 Environmental Statement Chapter 8 Ecology and Application Document 6.9 Environmental Statement Chapter 9 Ornithology** conclude that the Project, based on the current design as set out in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project**, avoids residual significant adverse impacts on all international and national and local statutory designated sites for nature conservation including SSSIs, non-statutory designated sites, priority habitats, important hedgerows and other terrestrial habitats.. This has been achieved by following the mitigation hierarchy with the design process, and in accordance with the Holford Guidance, to avoid impacts where possible.<br>It should be noted that this conclusion is based on the assessment surveys that have been undertaken thus far for the Project. Additional 2026 surveys are currently continuing, and any additional assessment results would be provided in addendum reports following submission of the DCO.<br>**Application Document 6.8 Environmental Statement Chapter 8 Ecology** concludes that there would be a residual significant adverse effect on Yellow birds-nest, which is a wildflower, due to the permanent loss of plants due to pylon working areas (pylons 4ZQ78 and 4ZQ77), access, stringing works, and overhead line clearance (between 4ZQ78 and 4ZQ76) requiring felling and management of trees within woodland at or in the vicinity of the top of Bilks Hill, and therefore the associated fungal network that the plant is dependent on. As noted above and in Table 8.21 of **Application** |

| Para | NPPF Policy Requirement | Project Compliance |
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| | c. A site of local importance, which for the purpose of this policy is one designated as a Local Nature Reserve or identified as a local wildlife site, local geological site or equivalent in the development plan, should only be supported if:<br>i. There would not be a significant adverse effect on the integrity of the site; or<br>ii. The benefits of development in the location proposed clearly outweigh the likely impact on the features which make the site valuable for nature conservation. | **Document 6.8 Environmental Statement Chapter 8 Ecology**, mitigation is proposed to ensure there would be no direct effects or encroachment on yellow bird's nest, however residual significant effects remain due to impacts to the fungal network that the flower relies on. The overriding public benefits and need for the Project are considered to outweigh this harm. There would be no other significant adverse effects on any other species or protected species, including all bird species.<br>It is also noted that if the LoD are used during construction near Jillywood Lane LWS, then habitats could be impacted in two locations. This would result in a significant adverse effect because the LWS has been recorded by the Project as containing Woodland with Characteristics of Ancient Woodland. Therefore, as a worst case, this habitat is considered irreplaceable. If the LoD is used, and trees are required to be removed at Jillywood Lane LWS, mitigation set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments** would ensure that any trees removed will not be removed to below ground level and not grubbed out to reduce the impact to soil and ground flora. Compensation would also be provided via new trees to be planted in proposed mitigation planting areas, outside the LWS, which are described in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and shown in **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.<br>A significant residual adverse effect is also anticipated on Socken Wood and Wood Farm Woodlands with Characteristics of Ancient Woodland. Additionally, if the LoD are used in one area, a significant residual effect is anticipated on one veteran tree.<br>National Grid considers that it has applied the mitigation hierarchy appropriately in designing the Project to avoid or reduce as far as possible, adverse effects on irreplaceable habitats. The location, routeing and siting of the Project has been designed to avoid and/or reduce impacts on designated ancient woodland and veteran trees as far as practicable.<br>It is acknowledged that significant effects are reported on some areas of Woodlands with Characteristics of Ancient Woodland, which would result in the loss or deterioration of irreplaceable habitats at Socken Wood and Wood Farm. Mitigation is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan and Application Document 7.3 Register of Environmental Actions and Commitments** to ensure that impacts are reduced as far as practicable, and compensation planting with a ratio of 3:1 is proposed and is secured in **Application Document 7.8 Outline Landscape and Ecology Management Plan**.<br>As the design currently stands and should the LoD not be used in Route Section A, the Project would not result in the loss or deterioration of any designated (on the AWI) ancient woodland or trees, or veteran trees. In the event that the LoD is used and the loss of one veteran tree is required, compensation planting (with a replanting ratio of 30:1) would be implemented as secured in **Application Document 7.3 Register of Environmental Actions and Commitments** and agreed with Natural England and East Riding of Yorkshire Council.<br>Mitigation and compensation planting (ratio of 3:1) is also proposed if the Project would result in the loss or deterioration of Woodland with Characteristics of Ancient Woodland within Jillywood Lane LWS (if the LoD are used in this location). These are secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Therefore, in accordance with paragraph 5.4.55 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) it is considered that the overriding public need and benefit of the Project (as set out in sections 3 and 7.5 of the **Application Document 5.5 Planning Statement**) would clearly outweigh the loss or deterioration of the habitat, and it would therefore be wholly exceptional. In addition, a relevant compensation strategy is provided within the Order Limits for potential impacts as far as possible and is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**. |
| 2. | Irrespective of a site's status in nature conservation terms, development proposals which would entail the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. | |
| 3. | This policy applies to development on land inside or outside a designated area, if it would have an impact on the identified biodiversity or geodiversity value of the area concerned. | |

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| **HE4: Securing the conservation of heritage assets** | | |
| 1. | Heritage assets, as an irreplaceable resource, should be conserved in a manner appropriate to their significance. To achieve this, development proposals which would affect the significance of heritage assets, including any contribution made by their setting should:<br>a. Maintain or secure a use consistent with their conservation, taking into account the importance of maintaining the assets, the positive contribution they can make to sustainable communities including local economies, and the positive contribution they can make to local character and distinctiveness; and<br>b. Avoid (or if that is not possible, minimise) harm to the significance of heritage assets, and instead conserve this significance. | National Grid has undertaken an iterative design process taking account of policy requirements, historic landscape character assessments and desk-based and fieldwork analysis in order to minimise and avoid, where possible, harm to the historic environment. In accordance with the mitigation hierarchy, the design of the Project has sought to avoid, reduce or mitigate potentially significant adverse effects on designated and non-designated heritage assets. Design decisions have been made to balance the need to avoid and reduce impacts on heritage assets, along with other environmental, social and operational considerations. Embedded mitigation measures are also incorporated into the design to minimise impacts as far as practicable, as secured in **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Measures relevant to the control and management of impacts to the historic environment during construction have been included within **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Further measures relevant to archaeology are set out within **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**, with archaeological works and management measures during the construction, operation and maintenance phases secured through **Application Document 7.10 Outline Cultural Heritage Management Plan**.<br>**Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** concludes that the Project would result in residual significant adverse effects on the setting of 28 designated heritage assets. There would be no residual significant adverse effects on any non-designated assets following the implementation of mitigation measures.<br>The Heritage Statement of Harm (Appendix A of **Application Document 5.5 Planning Statement**) concludes that in total, the Project would result in less than substantial harm to 66 heritage assets, which comprises 59 designated heritage assets, six conservation areas and one non-designated asset. Most of this harm is at the lower end of the scale, with nine designated heritage assets and one conservation area at the middle of the scale, and one designated heritage asset (Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190) which is a scheduled monument) at the higher end of the scale. The Project would not result in substantial harm to any designated or non-designated heritage assets.<br>With regard to less than substantial harm at the higher end of the scale for Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190), it was acknowledged during the routeing and siting exercise in in **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** that the preferred alignment would adversely affect the setting of the Hall Garth Moated site. This harm was deemed to be unavoidable, due to the need to avoid the significant and number of potential impacts of alternative routes in this location, including effects on the nationally and internationally designated nature conservation sites of the Humber Estuary and the protected and qualifying bird species at RSPB Blacktoft Sands Nature Reserve, as well as impacts to Grade II listed buildings, residential properties in Ousefleet and in proximity to an eastern route, Ousefleet Village Hall and playing field, agricultural practices and potential further complexities of additional line swaps.<br>Works within the boundary of Hall Garth would only consist of the removal of an existing wood pole electricity line, owned by Northern PowerGrid, which is proposed to be cabled underground beyond the site boundary, in order to avoid direct impacts to the heritage asset.<br>In addition, **Application Document 7.3 Register of Environmental Actions and Commitments** commits to measures relating to third-party access track to NPG-017 as shown on **Application Document 6.4.F4 Environmental Statement Figure 4.4** Third Party Works within the boundary of the Scheduled Monument Hall Garth Moated site (NHLE 1013190). These include no breaking of topsoil and/or below ground disturbance for the duration of the works, and track matting or a similar protected surface will be laid to allow for the movement of construction vehicles to and from the works area. |
| 2. | Any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) should have a clear and convincing justification in accordance with the policies in this chapter | |

| Para | NPPF Policy Requirement | Project Compliance |
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| | | Although the Project results in significant effects to designated heritage assets, there would be no substantial harm to any designated or non-designated heritage assets. It is considered that the overriding public benefits and need for the Project (as outlined in section 3 and 7 of **Application Document 5.5 Planning Statement**) would clearly and demonstrably outweigh the significant and less than substantial harm to heritage assets |
| **HE5: Assessing effects on heritage assets** | | |
| 1. | Development proposals affecting heritage assets should be accompanied by an assessment of the significance of the assets affected (including any contribution made by their setting) and of the potential effect of the proposal on their significance. The level of detail should be proportionate to the assets' importance and no more than is necessary to understand the potential effect of the proposal on their significance. The relevant historic environment record should be referred to in making this assessment, and appropriate expertise employed where necessary | **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** provides an assessment of likely effects of the Project on designated and non-designated heritage assets during construction and operation and maintenance of the Project. The chapter is supported by the following relevant appendices:<br>• **Application Document 6.10.A2 Environmental Statement Appendix 10.2 Cultural Heritage Baseline Report**; which lists and describes the designated and non-designated heritage assets relevant to the Project.<br>• **Application Document 6.10.A3 Cultural Heritage Visualisations**; provides visualisations of the viewpoints used in the cultural heritage assessment.<br>• **Application Document 6.10.A4 Appendix 10.4 Cultural Heritage Gazeteers**; which lists all designated heritage assets within the study area.<br>Designated heritage assets are also illustrated on **Application Document 6.10.F1 Environmental Statement Figure 10.1 Designated Assets Within Study Areas.Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** concludes that the Project would result in residual significant adverse effects on the setting of 28 designated heritage assets. There would be no residual significant adverse effects on any non-designated assets following the implementation of mitigation measures.<br>The Heritage Statement of Harm (Appendix A of **Application Document 5.5 Planning Statement**) concludes that in total, the Project would result in less than substantial harm to 66 heritage assets, which comprises 59 designated heritage assets, six conservation areas and one non-designated asset. Most of this harm is at the lower end of the scale, with nine designated heritage assets and one conservation area at the middle of the scale, and one designated heritage asset (Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190) which is a scheduled monument) at the higher end of the scale. The Project would not result in substantial harm to any designated or non-designated heritage assets. |
| 2. | Assessments of the potential effects of development proposals on the significance of heritage assets (including through effects on their setting) should identify whether proposals would be likely to:<br>a. Have a positive effect, which is where the significance of a heritage asset would be enhanced, or better revealed; or<br>b. Have no effect on the significance of a heritage asset; or<br>c. Result in harm to the significance of a heritage asset, either from work affecting the asset itself or from development within its setting. The degree of harm should be identified: substantial harm would occur where the development proposal would seriously affect a key element of the asset's significance; or<br>d. Cause the total loss of the significance of a heritage asset. | |
| 3. | In making this assessment it is the effect on a heritage asset's significance rather than the scale of the development which should be considered. | |
| 4. | Decision-makers should be satisfied that assessments accurately reflect the effects on heritage assets caused by development proposals. | |
| 5. | Where a development proposal involves, or has the potential to involve, a heritage asset with archaeological interest, an appropriate desk-based assessment should be undertaken and, where necessary, a field evaluation. These should be used to help understand the asset's significance and the potential effect of the proposal on this, which should inform the design, mitigation and implementation of the development. | A geoarchaeological desk-based assessment has been submitted as **Application Document 6.10.A7 Appendix 10.7 Geoarchaeological Desk-based Assessment** and the results of trial trenching, has been submitted as **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report**.<br>**Application Document Application Document 6.10.A5 Aerial Photography and LiDAR Report** also supports the cultural heritage assessment and maps all potential archaeological features within or in close proximity to the Order Limits that are visible as cropmarks, soilmarks and earthworks on air photos or can be detected on LiDAR imagery.<br>As set out in section 10.8 of **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage**, measures have been embedded into the design of the Project in relation to heritage assets with archaeological interest including:<br>• Informed by feedback from local communities, Historic England and from Cultural Heritage Advisors (Archaeological Advisors and Conservation Officers) to the relevant local planning authorities, the route has been diverted, where feasible, to preserve or minimise change to the settings of heritage assets. |

| Para | NPPF Policy Requirement | Project Compliance |
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| | | • The early identification through fieldwork survey and avoidance, where feasible, of areas of important archaeological remains.<br>Further measures relevant to archaeology are set out within **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**, with archaeological works and management measures during the construction, operation and maintenance phases secured through a requirement in **Application Document 3.1 Draft Development Consent Order**. |
| **HE6: Proposals affecting designated heritage assets** | | |
| 1. | When considering the potential effect of a development proposal on the significance of a designated heritage asset, substantial weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm, or total loss of its significance. | **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** presents an assessment of the Project on designated heritage assets, including consideration of effects that could result in a positive effect, harm, substantial harm, or total loss of its significance. It concludes that the Project will have direct impacts on designated assets, with the majority resulting in either negligible or minor adverse effect, but with some moderate adverse reported, and one incidence of major adverse. There will be total loss of designated heritage assets as a result of the Project. |
| 2. | Development proposals which would have a positive effect on a designated heritage asset should be supported. | |
| 3. | Any harm to a designated heritage asset will be a matter of considerable importance and weight, which should be dealt with in accordance with paragraphs 4 to 6 of this policy. | The Project does not have any significant effects on any Conservation Area. The project does not interact with any World Heritage Sites |
| 4. | Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal. Important public benefits can include securing the long-term reuse of a vacant or underused listed building, and enabling energy efficiency and low carbon heating measures to be employed. | National Grid has undertaken an iterative design process taking account of policy requirements, historic landscape character assessments and desk-based and fieldwork analysis in order to minimise and avoid, where possible, harm to the historic environment. In accordance with the mitigation hierarchy, the design of the Project has sought to avoid, reduce or mitigate potentially significant adverse effects on designated and non-designated heritage assets. Design decisions have been made to balance the need to avoid and reduce impacts on heritage assets, along with other environmental, social and operational considerations. Embedded mitigation measures are also incorporated into the design to minimise impacts as far as practicable, as secured in **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Measures relevant to the control and management of impacts to the historic environment during construction have been included within **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Further measures relevant to archaeology are set out within **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**, with archaeological works and management measures during the construction, operation and maintenance phases secured through **Application Document 7.10 Outline Cultural Heritage Management Plan**.<br>**Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** concludes that the Project would result in residual significant adverse effects on the setting of 28 designated heritage assets. There would be no residual significant adverse effects on any non-designated assets following the implementation of mitigation measures.<br>The Heritage Statement of Harm (Appendix A of **Application Document 5.5 Planning Statement**) concludes that in total, the Project would result in less than substantial harm to 66 heritage assets, which comprises 59 designated heritage assets, six conservation areas and one non-designated asset. Most of this harm is at the lower end of the scale, with nine designated heritage assets and one conservation area at the middle of the scale, and one designated heritage asset (Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190) which is a scheduled monument) at the higher end of the scale. The Project would not result in substantial harm to any designated or non-designated heritage assets.<br>With regard to less than substantial harm at the higher end of the scale for Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190), it was acknowledged during the routeing and siting exercise in in **Application Document 7.18 Corridor and Preliminary Routeing** |
| 5. | Where a development proposal would cause substantial harm to, or the total loss of, the significance of a designated heritage asset, consent should be refused unless it can be demonstrated that the harm is necessary to achieve substantial public benefits that outweigh the harm or loss, or if all of the following apply:<br>a. The nature of the heritage asset would otherwise prevent all reasonable uses of the site;<br>b. No suitable use for the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;<br>c. Conservation by grant-funding or some form of not for profit, charitable or public ownership is not possible; and<br>d. The harm or loss is outweighed by the benefit of bringing the asset back into use | |
| 6. | Within this context, development which would cause substantial harm to, or the total loss of, the significance of grade II listed buildings, or grade II registered parks or gardens, should be exceptional; while development which would cause substantial harm to, or the total loss of, assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. | |

| Para | NPPF Policy Requirement | Project Compliance |
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| | | **and Siting Study** that the preferred alignment would adversely affect the setting of the Hall Garth Moated site. This harm was deemed to be unavoidable, due to the need to avoid the significant and number of potential impacts of alternative routes in this location, including effects on the nationally and internationally designated nature conservation sites of the Humber Estuary and the protected and qualifying bird species at RSPB Blacktoft Sands Nature Reserve, as well as impacts to Grade II listed buildings, residential properties in Ousefleet and in proximity to an eastern route, Ousefleet Village Hall and playing field, agricultural practices and potential further complexities of additional line swaps.<br>Works within the boundary of Hall Garth would only consist of the removal of an existing wood pole electricity line, owned by Northern PowerGrid, which is proposed to be cabled underground beyond the site boundary, in order to avoid direct impacts to the heritage asset.<br>In addition, **Application Document 7.3 Register of Environmental Actions and Commitments** commits to measures relating to third-party access track to NPG-017 as shown on **Application Document 6.4.F4 Environmental Statement Figure 4.4** Third Party Works within the boundary of the Scheduled Monument Hall Garth Moated site (NHLE 1013190). These include no breaking of topsoil and/or below ground disturbance for the duration of the works, and track matting or a similar protected surface will be laid to allow for the movement of construction vehicles to and from the works area.<br>Although the Project results in significant effects to designated heritage assets, there would be no substantial harm to any designated or non-designated heritage assets. It is considered that the overriding public benefits and need for the Project (as outlined in section 3 and 7 of **Application Document 5.5 Planning Statement**) would clearly and demonstrably outweigh the significant and less than substantial harm to heritage assets |
| **HE7: Decisions on non-designated heritage assets** | | |
| 1. | Development proposals which would have a positive effect on a non-designated heritage asset should be supported. | **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** concludes that following the implementation of embedded, control and management measures there would be no significant effects to any non-designated built heritage assets, or non-designated archaeological assets as a result of the construction or operation (and maintenance) of the Project. The Heritage Statement of Harm (Appendix A of **Application Document 5.5 Planning Statement**) concludes that one non-designated medieval settlement archaeology (trial trenching area 19) would experience less than substantial harm at the lower end of the scale.<br>It is considered that the Project has undergone an iterative design process, following the mitigation hierarchy in seeking to protect and conserve heritage assets where practicable. The route has been sited and designed to minimise environmental impacts and impacts to heritage assets where possible, following a robust and comprehensive assessment of alternatives to try and avoid impacts to heritage assets. Mitigation is embedded into the Project design and working practices to reduce impacts to non-designated heritage assets as far as practicable. There is also a clear and demonstrable public need and benefit of the Project, which is considered to outweigh less than substantial harm to non-designated heritage assets. |
| 2. | Where a development proposal would harm the significance of a non-designated heritage asset, this should be weighed against the benefits of the proposal and a balanced judgement made, having regard to the scale of any harm or loss and the significance of the non-designated heritage asset. | |
| 3. | Where a development proposal would cause substantial harm to, or the total loss of, the significance of a non-designated heritage asset, it should only be supported where the harm or loss is outweighed by the benefits of the proposal, having regard to the scale of the harm or loss and the significance of the non-designated heritage asset. | |
| **HE10: Loss or removal of heritage assets** | | |
| 1. | Where a development proposal would result in the loss of the whole or part of a heritage asset (whether designated or not):<br>a. The development should not be approved without all reasonable steps being taken to ensure that the new development will proceed after the loss has occurred, including through the use of planning conditions and planning obligations to secure the development against the loss of the asset; and<br>b. The applicant should record and advance understanding of the significance of the asset to be lost in a manner proportionate to its importance and the potential impact upon it; and | The Project would not lead to the loss of any designated heritage assets or built non-designated heritage assets.<br>In terms of non-designated archaeological assets, **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** sets out that following the implementation of embedded, control and management measures proposed, including the carrying out of a programme of archaeological investigation prior to the commencement of construction activities in sensitive areas as set out in **Application Document 7.9 Outline Archaeological Written Scheme of** |

| Para | NPPF Policy Requirement | Project Compliance |
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| | should make this evidence (and any archive generated) publicly accessible by depositing it in the relevant Historic Environment Record, and any archives with a local museum or other public depository. The ability to record evidence of our past should not be a decisive factor in deciding whether such loss should be approved. | **Investigation** which will be secured by **Application Document 3.1 Draft Development Consent Order**, there would be no significant adverse effects on any non-designated archaeological assets.<br>In certain Trial Trenching Areas, the results of which are presented in **Application Document 6.10.A8 Environmental Statement Appendix 10.8 Archaeological Trial Trench Evaluation Report**, it has been agreed with the Archaeological Advisor to the local planning authority that impacts will be mitigated by a programme of archaeological excavation, recording and publication. This is secured by **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**. |
| 2. | Heritage assets with archaeological interest should be preserved in situ where feasible. Where an asset cannot be preserved or managed on-site, appropriate provision should be made for the investigation, understanding, recording, dissemination and archiving of that asset, which should be undertaken by suitably-qualified individuals or organisations. | |
| 3. | Development proposals to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), should retain the feature in situ where possible (and, where appropriate, be supported by an explanation of their historic and social context). | |

## 2.5 East Riding of Yorkshire Council Local Plan Update (2025)

Table 2.5 – Signposting for Compliance with the East Riding of Yorkshire Council Local Plan Update (2025)

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
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| Policy S1: Sustainable Development | Development proposals<br>A. When considering development proposals the council will take a positive approach that reflects the three overarching objectives of sustainable development as set out in paragraph 8 of the National Planning Policy Framework, economic, social and environmental, whilst taking in to account local circumstances. It will work proactively with applicants to find solutions that mean proposals can be approved wherever possible, and to secure development supporting the council's Vision and Objectives for the Local Plan and the other documents which make up the development plan.<br>B. The Local Plan should be read as a whole and in conjunction with the other documents which make up the development plan. Planning applications that accord with the policies in the development plan will be approved without delay, unless material considerations indicate otherwise.<br>C. Proposals should ensure that, where appropriate, development will support the future sustainable growth of settlements. Future access and connectivity to neighbouring land should be taken into consideration.<br>Creating Neighbourhood Plans<br>A. The council actively supports the development of Neighbourhood Development Plans within the East Riding.<br>B. Neighbourhood Development Plans proposing additional growth to that indicated in the Local Plan will be supported where infrastructure and service provision is able to accommodate the growth planned or can be delivered as part of the proposals. | The **Application Document 5.5 Planning Statement** and **Application Document 7.17 Strategic Options Report Including Needs Case** set out that the Project, if consented, would support the UK's net zero target by reinforcing the electricity transmission network between the North of England and the Midlands and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The Project would help meet future energy requirements and support the transition to a net zero economy. **Application Document 7.17 Strategic Options Report Including Needs Case** and section 3 of **Application Document 5.5 Planning Statement** explain that the Project is one of the essential network reinforcements needed to deliver the UK's net zero target and the Clean Power 2030 mission. The reinforcement will also support security and reliability of supply. Without reinforcement, the capacity of the existing network is insufficient to accommodate the connection of proposed new power sources connecting in the area.<br>The Project has considered the policies in this Local Plan in the development of the design and in the assessment of potential impacts of the Project, and accordance with these policies is set out in the **Application Document 5.5 Planning Statement** and in this table. The Environmental Statement (**Application Documents 6.1 to 6.22**), **Application Document 5.5 Planning Statement** and this table summarise the economic, social and environmental impacts of the Project, and it is concluded overall that the Project is in accordance with national policy including NPS EN-1 and NPS EN-5 which governs NSIPs such as the Project, because the Project will not result in adverse impacts that outweigh its benefits. In addition, the Project complies with the polices in this Local Plan and ensures that the Project will support the future sustainable growth of settlements in accordance with this policy. |
| Policy S2: Addressing Climate Change | Development proposals will be supported where they reduce the generation of additional greenhouse gas emissions and incorporate adaptation to the expected impacts of climate change. This will be accomplished by:<br>A. Directing most new development to areas where there are services, facilities, homes and jobs, reducing the need to travel and where it can be served more easily and viably by sustainable modes of transport.<br>B. Efficiently using land, mineral, energy and water resources. | The **Application Document 5.5 Planning Statement** and **Application Document 7.17 Strategic Options Report Including Needs Case** set out that the Project, if consented, would support the UK's net zero target by reinforcing the electricity transmission network between the North of England and the Midlands and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The Project would help meet future energy requirements and support the transition to a net zero economy. |

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
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| | C. The re-use of the area's building stock and previously developed land.<br>D. Building at higher densities where appropriate and supporting opportunities for mixed use development.<br>E. Promoting sustainable modes of transport and well-connected places.<br>F. Promoting the creation of economic clusters for the renewable and low carbon energy sector.<br>G. Incorporating high standards of sustainable design and construction which involve design approaches minimising energy demands, the prudent and efficient use of natural resources, and built-in resilience to the impacts of climate change (e.g. overheating, flood risk).<br>H. Incorporating renewable, low carbon and decentralised energy generation and heat networks in appropriate locations and schemes where possible.<br>I. Supporting proposals that protect, enhance and link habitat networks to allow biodiversity to adapt to climate change.<br>J. Conserving, enhancing and linking green infrastructure networks to provide flood management, shading in areas of built development and natural air conditioning.<br>K. Steering development away from areas of high flood risk as far as possible, and ensuring development is as resilient as possible to any residual risks.<br>L. Supporting effective on-site water management such as Sustainable Drainage Systems and wider flood management proposals.<br>M. Implementing the most recent Shoreline Management Plan and Humber 2100+ strategy.<br>N. Managing development in coastal areas and facilitating the re-location /roll back of development from areas between Barmston and Spurn Point.<br>O. Exploiting carbon capture approaches through the protection and restoration of existing 'carbon sinks' such as peat bogs and coastal ecosystems, the creation and expansion of woodland, and the deployment of new technologies.<br>P. Support the development of infrastructure, such as hydrogen transportation, that facilitates decarbonisation. | The Lifecycle GHG Assessment in **Application Document 6.19 Environmental Statement Chapter 19 Climate Change** concludes that while the Project will result in GHG emissions during construction and operation, there will not be a significant effect as it will also play an important role in facilitating the decarbonisation of the UK electricity system by enabling the connection and transmission of renewable and low-carbon energy.<br>Measures have been embedded into the Project design to reduce GHG emissions and provide climate change resilience where practicable. These measures are set out in section 19.8 of **Application Document 6.19 Environmental Statement Chapter 19 Climate Change** and **Application Document 6.19.A4 Environmental Statement Appendix 19.4 Greenhouse Gas Reduction Strategy** and include:<br>• The routeing and design of the Project including co-location and parallel alignment with existing overhead line infrastructure to avoid environmentally sensitive features and minimise land-take and habitat loss and associated emissions;<br>• Commitments made in **Application Document 7.2 Outline Code of Construction Practice** relating to construction such as the inclusion of strategically located temporary haul roads and access routes to improve construction efficiency and reduce vehicle movements;<br>• The use of existing watercourse crossing points where practicable, reducing construction requirements and associated emissions;<br>• National Grid's commitment to delivering at least 10% Biodiversity Net Gain, contributing to enhanced carbon sequestration and climate resilience;<br>• The use of low carbon construction methods, transport and materials where practicable to minimise embodied carbon and emissions across the Project lifecycle;<br>• Designing the Project to be resilient to significant effects of climate change, including flood mitigation measures detailed in **Application Document 7.13 Flood Risk Assessment** and **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**; and<br>• Nature based solutions such as SuDS. |
| Policy S4: Supporting development in Villages and Countryside | A. Outside of the settlements listed in Policy S3, development will be supported to help maintain the vibrancy of Villages (listed in Appendix B) and the Countryside where it:<br>1. Is of an appropriate scale to its location taking into account the need to support sustainable patterns of development;<br>2. Encourages the re-use of previously developed land where appropriate; and<br>3. Does not involve a significant loss of best and most versatile agricultural land.<br>B. Development in Villages and the Countryside should also accord with the specific provisions of Part C or D of this policy. Proposals not listed under Part D should demonstrate why they require a rural location.<br>Villages<br>A. Within the development limits of Villages, as set out on the Policies Map Update or as proposed by a Neighbourhood Plan, the following forms of development will be supported where it does not detract from the character and appearance of the village:<br>1. New housing, including affordable housing for local people;<br>2. New and/or enhanced local services and facilities; and<br>3. Economic development. | The Project is a utility infrastructure development and is to be sited outside of the defined settlement boundaries.<br>It is concluded that the Project is of an appropriate scale to its location, due to it being one of the essential network reinforcements in the North of England and the Midlands needed to deliver the UK's net zero target and the Clean Power 2030 mission, and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The reinforcement will also support security and reliability of supply. Without reinforcement, the capacity of the existing network is insufficient to accommodate the connection of proposed new power sources connecting in the area.<br>The Project is likely to have a significant adverse effect on BMV land during the construction and operation of the Project, with the permanent removal of 34.4 hectares of BMV land, amounting to 2.27% of agricultural land within the Order Limits. It is considered that although this effect would be significant and permanent, the benefits and urgent need of the Project in terms of providing sufficient capacity to the network in the North of England and Midlands, in order to facilitate the connection of planned renewable energy projects and help to deliver the UK's net zero target and the Clean Power 2030 mission, would outweigh this loss.<br>Policy S4 supports 'Energy development and associated infrastructure' provided the proposals respect the intrinsic character of their surroundings. The Project has been subject to a |

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
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| | Countryside<br>A. Outside of a development limit, land will be regarded as the Countryside and the following forms of development are supported, where proposals respect the intrinsic character of their surroundings:<br>1. Conversion of buildings for economic development (including work-live units), tourism or community uses. Conversions for new housing will be supported where the preservation of the building would enhance the immediate setting and where it:<br>i. would represent the optimal viable use of a heritage asset; or<br>ii. would re-use a redundant or disused building without significant alteration or significant extension.<br>2. Replacement dwellings and the subdivision of an existing residential building;<br>3. New dwellings of exceptional quality;<br>4. Affordable housing for local people which could include community-led housing;<br>5. Agricultural, forestry or other rural-based occupational dwellings subject to demonstrating an essential need. Such dwellings will be subject to an agricultural occupancy condition;<br>6. New or extended sites for gypsy and travellers, or new facilities on existing sites, in accordance with Policy H3;<br>7. Specialist accommodation provided for people with identified care needs;<br>8. Employment uses in accordance with Policy EC1;<br>9. Agricultural, horticultural and forestry uses;<br>10. New and enhanced infrastructure;<br>11. Energy development and associated infrastructure;<br>12. Development to support existing military defence operations; and<br>13. Sports, equine, recreation, community facilities and tourism development. | comprehensive site selection and routeing process to avoid or reduce environmental impacts as far as practicable. A detailed summary of this process is available in **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study and Application Document 7.17 Strategic Options Report Including Needs Case** |
| Policy S8: Conntecting people and places | A. New development should ensure that people and places are well connected.<br>B. The overall role and function of the Strategic Transport Network, as shown in Figure 6, will be protected and/or enhanced, having regard to the investment priorities, policies, and proposals of the Local Transport Plan and other related strategies.<br>C. Transport schemes that improve the overall capacity and coverage of the transport network will be supported. Where appropriate land will be safeguarded for these schemes in the Allocations Document Update or a Neighbourhood Plan.<br>D. The role and function of the East-West Multi-Modal Transport Corridor, which serves the transport needs of Key Employment Sites, will be protected and/or enhanced, where appropriate, to enable the efficient and integrated movement of freight by, and between, different transport modes, as well as for the movement of people from their homes to jobs.<br>E. Roadside facilities and parking essential to support the safety and welfare of motorists and lorry drivers will be supported, where they are of an appropriate scale, meet an identified need, and can be accessed safely.<br>F. Existing and future port operations at Goole within the Operational Port Area, as shown on the Policies Map Update, will be safeguarded from development which would conflict with this use. Where port operations could have a significant adverse effect on new development in its vicinity, applicants should be required to provide suitable mitigation before the development has been completed. | An assessment of the transport impacts of the Project is detailed in **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport**. A Transport Assessment also supports the Application, **Application Document 7.15 Transport Assessment** also supports the Application, which concludes that the Project would not give rise to unacceptable impacts on highway safety or cause severe residual cumulative impacts on the road network in the AM and PM peak hour. Construction traffic effects are temporary, modest in absolute terms and dispersed across the network.<br>Transport and traffic considerations have been integral to the design of the Project, and embedded and control and management measures have been incorporated into the design from the outset to avoid or reduce effects as far as practicable. Embedded measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments** and include:<br>• The Project design includes strategically located and optimised construction access tracks (construction access tracks) along the Project alignment to support construction of the Project and reduce the effects of construction traffic movements on the local public highway network during construction.<br>• The selection of Primary Access Routes (PARs) has been in part informed by a need to avoid impacting areas of population wherever possible and to maximise the use of construction access tracks. PARs are shown on **Application Document 6.14.F1 Environmental Statement Figure 14.1 Primary Access Routes**.<br>Control and management measures are set out in Application Document 7.3 Register of Environmental Actions and Commitments and Application Document 7.4 Outline Construction Traffic |

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
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| | G. Existing wharf and rail facilities on the Aire and Calder Canal, River Ouse, Humber Estuary, and elsewhere will be safeguarded to maintain a choice of sustainable transport modes.<br>H. Provision of new and improved walking, cycling and public transport facilities will be supported. Existing and disused public transport, cycling and footpath networks and facilities, including public rights of way, will be enhanced and/or protected, particularly within and linking to the Major Haltemprice Settlements, Principal Towns, and Towns as well as existing and proposed blue / green infrastructure corridors.<br>I. Proposals that facilitate integration and connection between different modes of travel, especially walking, cycling and public transport, will be encouraged.<br>J. Initiatives that improve accessibility in rural areas will be supported, through working with the Local Transport Plan and other strategies and programmes, including the community transport sector. | Management Plan and include but are not limited to temporary traffic regulation orders, temporary traffic management and highway works, construction working hours outside of peak times, and measures to reduce route and journey mileage to and from, and around, the site, and to prevent potential nuisance to residents, businesses and the wider community associated with parking, vehicle movements and access restrictions.<br>PRoWs will be managed in accordance with the PRoW Management Plan which will be developed in accordance with **Application Document 7.6 Outline Public Rights of Way Management Plan**. |
| Policy S9: Strengthening blue / green infrastructure | A. Development proposals will:<br>1. Incorporate a comprehensive design that is underpinned by its consideration of existing and new blue / green infrastructure features, including those features required by policies ENV1, 2, 3, 4, 5, 6 and C3; and<br>2. Capitalise on opportunities to:<br>i. Maintain, enhance and where possible create links between blue / green infrastructure features such as those listed in Table 9. Links should be created both on-site and, where possible, with nearby blue / green infrastructure features;<br>ii. Utilise potential multifunctional benefits of blue / green infrastructure features; and<br>iii. Enhance blue / green infrastructure opportunities identified in Neighbourhood Plans.<br>B. Development proposals within, or in close proximity to, a blue / green infrastructure corridor should contribute to enhancing the functionality and connectivity of the corridor<br>C. Development proposals should seek to avoid increasing recreational pressures on designated biodiversity assets, as set out in Policy ENV4. Where a potential increase is unavoidable proposals will provide mitigation in the form of blue / green infrastructure provision. | The location and design of the Project is the result of a comprehensive site selection process that was led by the consideration of good design and key environmental and planning constraints to avoid and minimise impacts as early as possible. **Application Document 5.9 Design Development Report** explains where design choices have sought to reduce the environmental effects of the Project and demonstrates that the design has incorporated embedded mitigation to avoid or reduce significant environmental effects where practicable. **Application Document 7.3 Register of Environmental Actions and Commitments** details the embedded measures and additional mitigation measures that have been identified through the Environmental Impact Assessment to avoid or reduce likely significant environmental effects. The following measures are proposed in relation to blue and green infrastructure features.<br>The Project's aim is to retain existing vegetation wherever practicable in accordance with **Application Document 7.3 Register of Environmental Actions and Commitments**. Where reasonably practicable, construction elements (such as working areas, accesses, laydown and temporary construction compounds) will be kept to the minimum required and micro-sited to avoid impacts on ecologically important features. Overseen and informed by the ECoW and ArbCoW, sensitive habitats will be demarcated to ensure contractors protect as much vegetation as possible.<br>As a general principle, all land which is temporarily impacted by the Project will be reinstated where practicable to its pre-construction condition land use. In addition to the reinstated habitats across the route, there will also be 'mitigation planting areas' located in key locations through the Project. The locations of these areas are detailed within **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design** and Table 8.2 of **Application Document 7.8 Outline Landscape and Ecology Management Plan** sets out a list of the mitigation planting areas proposed within the Order Limits.<br>The habitats to be created and/or enhanced in these areas (on-site mitigation) have been designed to provide landscape and visual mitigation while also offering ecological value. Along the proposed overhead line, 60 landscape mitigation planting areas have been identified within the Order Limits to provide landscape and visual mitigation, whilst also delivering ecological benefits. Indicative landscape proposals for each of these areas are shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.<br>The Project will use existing watercourse crossing points as far as practicable to minimise the introduction of new crossings and associated impacts. Following the completion of works, all temporarily impacted watercourses will be reinstated to their former state, or better. All temporary structures such as culverts, bridges and dams will be removed, and all impacted watercourse features including bank profile, bed levels, and gradients will be reinstated (where not considered an upgrade to an existing culvert). This will include the replacement of any substrate or vegetation that was temporarily removed. |

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
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| | | The Project would not increase recreational pressures on any designated biodiversity asset. |
| Policy EC1: Supporting the growth and diversification of the East Riding economy | A. To strengthen and encourage growth of the East Riding economy, employment development will be supported where the proposal is of a scale suitable to the location. Proposals will be encouraged where they:<br>1. Contribute to the modernisation, decarbonisation, development and diversification of the local economy, including remote working and co-working;<br>2. Develop and strengthen the East Riding's key employment sectors and clusters including: renewable and low carbon energy; manufacturing and engineering (including chemicals); agriculture/food and drink; biorenewables; tourism; ports and logistics; transport equipment; digital and creative industries; finance and business services; construction; public administration, defence, health and education; and retail;<br>3. Contribute towards reducing social exclusion and provide employment opportunities in deprived areas;<br>4. Contribute to the improvement in the physical appearance of an existing or vacant employment site or premises;<br>5. Support the vitality and viability of a Town or District Centre; or<br>6. Support the delivery of the Freeport initiative and its associated tax sites through comprehensive planning. The tax sites are shown on the Policies Map.<br>B. Key Employment Sites will be safeguarded from alternative uses.<br>C. There will be a presumption in favour of retaining all other employment land and premises. Proposals involving the loss of land or premises from employment use will be supported where:<br>1. There is no longer a need, or it is not viable, for that or any other employment use on the site, which has been demonstrated by an up-to-date employment land review or through a comprehensive marketing exercise;<br>2. The use of the site for employment purposes is not in conformity with adjoining land uses and could give rise to complaint; or<br>3. The development would make a significant contribution towards the wider regeneration of the locality and would support other planning priorities set out in the Plan.<br>D. Outside of development limits employment development will be supported where it is of an appropriate scale to its location, is accessible and respects the character of the surrounding landscape. Proposals should:<br>1. Be within or adjacent to an existing industrial estate or business park;<br>2. Involve the expansion of an existing business;<br>3. Involve the conversion of an existing building;<br>4. Involve the redevelopment of redundant agricultural buildings that are no longer viable for agricultural uses, where conversion is not practicable; or<br>5. Have a functional need to be in the particular location which cannot be met on either a nearby allocation, or on a site which satisfies any of the above criteria.<br>A. Substantial proposals for employment development that cannot be accommodated on allocated sites will be supported where the development is for a specified end user where proven substantial employment benefits would arise. The identified site will provide the most appropriate location for the proposal, with priority given to locations that are adjacent to existing employment sites and in locations well-related to the Major Haltemprice Settlements, Principal Towns or the East-West Multi-Modal Transport Corridor. | As set out in **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism**, the Project would contribute to the growth and employment within East Riding through the construction period as it would result in beneficial effects on employment and GVA during the construction period, amounting to on average, 284 total net jobs per annum during the construction period, of which 57 jobs per annum will be expected to be taken up by residents in the 60 minute Drive Time Area of the Project. The construction of the Project will contribute approximately £39.9 million to the national economy, of which £8 million would likely be within the 60-minute Drive Time Area. It is concluded that considering the worse-case scenario existing seasonal demand and typical occupancy (2025 levels), the peak non-local workforce could be accommodated within existing provision within a 60-minute Drive Time Area.<br>The Project would not have any impact on any key employment sites allocated in the Local Plan. |

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
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| | B. Farm diversification schemes will be encouraged providing they are of an appropriate scale to their location, respect the character of the surrounding landscape, re-use existing buildings where possible and any new buildings are well related to the built form and scale of the farm.<br>C. Employment allocations are set out in the Allocations Document Update or a Neighbourhood Plan. | |
| Policy EC4: Enhancing sustainable transport | A. To increase overall accessibility, minimise congestion, improve safety, reduce greenhouse gas emissions, encourage healthy lifestyles and reduce social exclusion, new development will be supported where it is accessible, or can be made accessible, by sustainable modes of transport and addresses its likely transport impact. Development proposals should:<br>1. Produce and agree a transport assessment and travel plan, where a significant transport impact is likely;<br>2. Provide access to sustainable travel options which may include public transport, electric and ultra-low emission vehicles, car sharing, cycling and walking; particularly in the Major Haltemprice Settlements, Principal Towns, and Towns; and<br>3. Bring forward other necessary transport infrastructure to accommodate expected movement to and from the development.<br>B. Developments generating significant freight movement located along the East-West Multi-Modal Transport Corridor should capitalise on the opportunities for transferring and transporting freight by means other than road.<br>C. The number of parking spaces for all new development should reflect:<br>1. Accessibility of development, particularly by public transport;<br>2. The expected car usage on the site, including an adequate provision of spaces for the charging of plug-in electric and other ultra-low emission vehicles; and<br>3. The most efficient use of space available and promotion of good design. | **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** provides an assessment of the potential impacts of the Project on traffic and transport. It concludes that following the implementation of embedded, control and management measures set out in **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.4 Outline Construction Traffic Management Plan** there would be no residual significant adverse effects on any PARs. There would be no residual significant adverse effects with respect to non-motorised user delay, non-motorised user amenity, fear and intimidation, driver delay or highway safety. The Project would result in the temporary road closure of Tongue Lane (PAR 28), however the effects of the temporary redistribution of traffic onto other PARs is concluded to be not significant.<br>**Application Document 7.15 Transport Assessment** also supports the Application, which concludes that the Project would not give rise to unacceptable impacts on highway safety or cause severe residual cumulative impacts on the road network in the AM and PM peak hour. Construction traffic effects are temporary, modest in absolute terms and dispersed across the network.<br>An Outline Construction Workforce Travel Plan is included within **Application Document 7.4 Outline Construction Traffic Management Plan** which sets out the principles, objectives and minimum requirements for managing construction workforce travel in a sustainable manner, and contribute to decarbonisation of the transport network.<br>**Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** and **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** anticipates that, following the implementation of embedded and control measures, there would be no permanent PRoW closures or diversions as a result of the Project. Any closures and diversions would be temporary in nature and be carried out in accordance with the measures set out in **Application Document 7.6 Outline Public Rights of Way Management Plan**. The diverted routes are anticipated to be primarily used for recreational purposes, with the proposed diversions offering a comparable recreational experience to the existing routes with similar character and amenity value for users. No significant effects on any PRoW are anticipated during construction, operation and maintenance of the Project.<br>Transport and traffic considerations have been integral to the design of the Project, and embedded and control and management measures have been incorporated into the design from the outset to avoid or reduce effects as far as practicable. Embedded measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments** and include:<br>• The Project design includes strategically located and optimised construction access tracks along the Project alignment to support construction of the Project and reduce the effects of construction traffic movements on the local public highway network during construction.<br>• The selection of PARs has been in part informed by a need to avoid impacting areas of population wherever possible and to maximise the use of construction access tracks. PARs are shown on **Application Document 6.14.F1 Environmental Statement Figure 14.1 Primary Access Routes**.<br>Control and management measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments and Application Document 7.4 Outline Construction Traffic Management Plan** and include but are not limited to temporary traffic regulation orders, temporary traffic management and highway works, construction working hours |

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
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| | | outside of peak times, and measures to reduce route and journey mileage to and from, and around, the site, and to prevent potential nuisance to residents, businesses and the wider community associated with parking, vehicle movements and access restrictions.<br>PRoWs will be managed in accordance with the PRoW Management Plan which will be developed in accordance with **Application Document 7.6 Outline Public Rights of Way Management Plan**. |
| Policy EC5: Supporting the renewable and low carbon energy sector | A. Proposals for the development of the energy sector, excluding mineral extraction, but including all other types of development listed in Table 13, will be supported where any significant adverse impacts are addressed satisfactorily, and the residual harm is outweighed by the wider benefits of the proposal. Developments and their associated infrastructure should be acceptable in terms of:<br>1. The cumulative impact of the proposal with other existing and proposed energy sector developments;<br>2. The character and sensitivity of landscapes to accommodate energy development, with particular consideration to the identified Important Landscape Areas, as shown on Figure 13, and for onshore wind energy developments, the Wind Energy Landscape Sensitivity Strategy shown in Figure 11.<br>3. The effects of development on:<br>i. local amenity, including noise, air and water quality, traffic, vibration, dust, light (including reflection, glint, glare and shadow flicker), and visual impact;<br>ii. biodiversity, geodiversity and nature, particularly in relation to designations, displacement, disturbance and collision and the impact of emissions/ contamination;<br>iii. the historic environment, including individual and groups of heritage assets above and below ground;<br>iv. telecommunications and other networks; including the need for additional cabling to connect to the National Grid, electromagnetic production and interference, and aeronautical impacts such as on radar systems;<br>v. transport, including the opportunity to use waterways and rail for transportation of materials and fuel, and the capacity of the road network to accommodate development;<br>vi. increasing the risk of flooding; and<br>vii. the land, including land stability, contamination, best and most versatile agricultural land and soil resources.<br>B. Where appropriate, proposals should include provision for decommissioning at the end of their operational life. Where decommissioning is necessary, the site should be restored, with minimal adverse impact on amenity, landscape and biodiversity, and opportunities taken for enhancement of these features. | The Project will support proposals foe development in the energy sector including Solar PV and Wind development as set out in Table 13 of Policy EC5.<br>*Cumulative Impact*<br>A comprehensive four-stage assessment evaluated interactions with 45 shortlisted existing, consented, and reasonably foreseeable developments within the 20 km cumulative Zone of Influence (comprising NSIPs, major solar and battery storage schemes, and local authority developments). Across the majority of environmental topics, including ecology, ornithology, water environment, geology, traffic, noise, and air quality, no significant residual cumulative effects are identified, with potential interactions successfully managed through embedded design, standard construction practice (CoCP/CEMP), and coordinated inter-project agreements. Significant residual cumulative effects are restricted to three specific areas:<br>• Landscape and Visual: Significant cumulative operational effects occur where the Project is viewed sequentially or concurrently alongside other major linear energy infrastructure, new substations, or extensive ground-mounted solar arrays (notably around the Creyke Beck, Drax, and High Marnham corridors).<br>• Cultural Heritage: A moderate adverse significant cumulative setting effect is identified in combination with the Clean Air Solar Farm upon the setting of the Risby Jacobean gardens, hall, and medieval settlement remains scheduled monument.<br>• Agriculture and Soils: Because the Project in isolation results in a significant effect through the permanent loss of Best and Most Versatile (BMV) agricultural land (34.4 ha), the cumulative effect in combination with other proposed developments that also affect BMV land is assessed as major significant.<br>These identified residual cumulative effects have been minimised as far as practicable in accordance with the mitigation hierarchy. Applying the Critical National Priority (CNP) decision-making framework under NPS EN-1 Paragraphs 4.2.28 to 4.2.30, none of these residual cumulative impacts engage the statutory exception thresholds, and they are clearly outweighed by the urgent national public need to deliver strategic transmission capacity and reinforce the UK energy network.<br>*Landscape*<br>Landscape and visual matters were considered in the early stages of siting and design of the project and embedded measures have been intrinsic to the design of the Project to reduce and where possible avoid landscape and visual effects. **Application Document 5.9 Design Development Report** and **Application Document 7.17 Strategic Options Report Including Needs Case** both provide an overview of the design rationale for the Project. They explain how the Project has sought to avoid or reduce significant environmental effects, including landscape and visual effects, wherever practicable, from the initial option identification and selection stage up to the refinement of the Project in response to feedback, further assessments and design work. Embedded measures include:<br>• Where possible the Project has been designed to be parallel or close parallel with the existing overhead lines to reduce the spread of effects from overhead lines in the landscape. Route Sections where close parallel routeing has been possible, taking into account constraints present along the existing overhead lines as well as technical complexity, include Route Section A which has been routed to minimise the effects on the Yorkshire Wolds Important Landscape Area, and Route Section B between the River Ouse and Luddington. |

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
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- Where possible and where the Project is not close parallel with the existing overhead lines, the Project has been designed to avoid existing vegetation. Examples include using existing field entrances for access to avoid unnecessary removal of mature hedgerows and trees throughout the length of the Project.

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

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

**Application Document 6.6 Environmental Statement Chapter 6 Landscape** concludes that, following the implementation of the proposed embedded and additional mitigation, there would not be any significant adverse effects on any designated landscapes, which includes the Yorkshire Wolds Important Landscape Area.

*Local Amenity*

The following assessments have been undertaken in relation to local amenity under Policy EC5:

- **Assessment of noise and vibration (Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration)**;
- **Assessment of air quality (Application Document 6.15 Environmental Statement Chapter 15 Air Quality)**;
- **Assessment of water quality (Application Document 6.11 Environmental Statement Chapter 11 Water Quality)**;
- **Assessment of traffic (Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport)**.

Following the implementation of mitigation measures in **Application Document 7.3 Register of Environmental Actions and Commitments**, no significant effects are anticipated on the above in respect of amenity.

*Biodiversity*

Following the implementation of embedded, control and additional mitigation measures, **Application Document 6.8 Environmental Statement Chapter 8 Ecology and Application Document 6.9 Environmental Statement Chapter 9 Ornithology** conclude that the Project, based on the current design as set out in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project**, avoids residual significant adverse impacts on all international and national and local statutory designated sites for nature conservation including SSSIs, non-statutory designated sites, priority habitats, important hedgerows and other terrestrial habitats.. This has been achieved by following the mitigation hierarchy with the design process, and in accordance with the Holford Guidance, to avoid impacts where possible.

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

**Application Document 6.8 Environmental Statement Chapter 8 Ecology** concludes that there would be a residual significant adverse effect on Yellow birds-nest, which is a wildflower, due to the permanent loss of plants due to pylon working areas (pylons 4ZQ78 and 4ZQ77), access, stringing works, and overhead line clearance (between 4ZQ78 and 4ZQ76) requiring felling and management of trees within woodland at or in the vicinity of the top of Bilks Hill, and therefore the associated fungal network that the plant is dependent on. As noted above and in Table 8.21 of **Application Document**

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
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| | | **6.8 Environmental Statement Chapter 8 Ecology**, mitigation is proposed to ensure there would be no direct effects or encroachment on yellow bird's nest, however residual significant effects remain due to impacts to the fungal network that the flower relies on. The overriding public benefits and need for the Project are considered to outweigh this harm. There would be no other significant adverse effects on any other species or protected species, including all bird species.<br>It is also noted that if the LoD are used during construction near Jillywood Lane LWS, then habitats could be impacted in two locations. This would result in a significant adverse effect because the LWS has been recorded by the Project as containing Woodland with Characteristics of Ancient Woodland. Therefore, as a worst case, this habitat is considered irreplaceable. If the LoD is used, and trees are required to be removed at Jillywood Lane LWS, mitigation set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments** would ensure that any trees removed will not be removed to below ground level and not grubbed out to reduce the impact to soil and ground flora. Compensation would also be provided via new trees to be planted in proposed mitigation planting areas, outside the LWS, which are described in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and shown in **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.<br>A significant residual adverse effect is also anticipated on Socken Wood and Wood Farm Woodlands with Characteristics of Ancient Woodland. Additionally, if the LoD are used in one area, a significant residual effect is anticipated on one veteran tree.<br>National Grid considers that it has applied the mitigation hierarchy appropriately in designing the Project to avoid or reduce as far as possible, adverse effects on irreplaceable habitats. The location, routeing and siting of the Project has been designed to avoid and/or reduce impacts on designated ancient woodland and veteran trees as far as practicable.<br>It is acknowledged that significant effects are reported on some areas of Woodlands with Characteristics of Ancient Woodland, which would result in the loss or deterioration of irreplaceable habitats at Socken Wood and Wood Farm. Mitigation is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan and Application Document 7.3 Register of Environmental Actions and Commitments** to ensure that impacts are reduced as far as practicable, and compensation planting with a ratio of 3:1 is proposed and is secured in **Application Document 7.8 Outline Landscape and Ecology Management Plan**.<br>As the design currently stands and should the LoD not be used in Route Section A, the Project would not result in the loss or deterioration of any designated (on the AWI) ancient woodland or trees, or veteran trees. In the event that the LoD is used and the loss of one veteran tree is required, compensation planting (with a replanting ratio of 30:1) would be implemented as secured in **Application Document 7.3 Register of Environmental Actions and Commitments** and agreed with Natural England and East Riding of Yorkshire Council.<br>Mitigation and compensation planting (ratio of 3:1) is also proposed if the Project would result in the loss or deterioration of Woodland with Characteristics of Ancient Woodland within Jillywood Lane LWS (if the LoD are used in this location). These are secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Therefore, in accordance with paragraph 5.4.55 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) it is considered that the overriding public need and benefit of the Project (as set out in sections 3 and 7.5 of the **Application Document 5.5 Planning Statement**) would clearly outweigh the loss or deterioration of the habitat, and it would therefore be wholly exceptional. In addition, a relevant compensation strategy is provided within the Order Limits for potential impacts as far as possible and is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**. |

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
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| | | *Historic Environment*<br><br>National Grid has undertaken an iterative design process taking account of policy requirements, historic landscape character assessments and desk-based and fieldwork analysis in order to minimise and avoid, where possible, harm to the historic environment. In accordance with the mitigation hierarchy the design of the Project has sought to avoid, reduce or mitigated potentially significant adverse effects on designated and non-designated heritage assets.<br><br>As set out in section 10.8 of **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage**, measures have been embedded into the design of the Project including:<br><br>• To minimise setting change, the Project has been designed, where feasible, to be parallel or close parallel with existing overhead lines to reduce the spread of infrastructure in views.<br>• Informed by feedback from local communities, Historic England and from Cultural Heritage Advisors (Archaeological Advisors and Conservation Officers) to the relevant local planning authorities, the route has been diverted, where feasible, to preserve or minimise change to the settings of heritage assets.<br>• The early identification through fieldwork survey and avoidance, where feasible, of areas of important archaeological remains.<br><br>Measures relevant to the control and management of impacts on the historic environment during construction have been included within **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**. Further measures relevant to archaeology are set out within **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**, with archaeological works and management measures during the construction, operation and maintenance phases secured through **Application Document 7.10 Outline Cultural Heritage Management Plan**.<br><br>**Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** concludes that the Project would result in significant adverse effects on the setting of 15 designated heritage assets in East Yorkshire. The Heritage Statement of Harm (Appendix A of **Application Document 5.5 Planning Statement**) concludes that the majority of these would result in less than substantial harm, concluding that in total the Project would result in less than substantial harm to 4 Conservation Areas, 19 designated heritage assets and one non-designated asset in East Riding of Yorkshire; less than substantial harm at the middle of the scale to 4 designated assets; and less than substantial harm at the higher end of the scale to Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190) which is a scheduled monument.<br><br>*Telecommunications and Other Networks*<br><br>**Application Document 7.11 Electric and Magnetic Field Compliance Report** demonstrates that the Project is compliant with the International Commission on Non-Ionizing Radiation Protection Guidelines (ICNIRP) (1998) in ensuring that the threshold for impacts to humans is not met/exceeded. National Grid will ensure that policies and procedures are in place at the design phase to ensure that all equipment complies with public EMF exposure limits.<br><br>*Transport including waterways and rail*<br><br>As set out in **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** consideration for the use of alternative transport modes, including both rail and waterborne transport has been undertaken. An assessment of the available transport infrastructure, site access requirements and construction logistics concluded that road transport represents the most practical, efficient, and feasible means of transporting materials, plant, and equipment required for the construction of the Project. Accordingly, road-based transport has been adopted as the primary mode for construction-related movements. Engagement has been undertaken with the Canal and River Trust which confirmed that the use of canals would not be appropriate for construction traffic for the movement of construction materials. |

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
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| | | *Flooding*<br>**Application Document 7.13 Flood Risk Assessment** has been prepared which assesses whether the Project is likely to be at risk of flooding or is likely to increase flood risk elsewhere. The FRA concludes that from the outset of the Project, a sequential approach has been taken to siting infrastructure for the Project, particularly those elements that are vulnerable to inundation, as evidenced in **Application Document 7.17 Strategic Options Report Including Needs Case**.<br>The water environment and flood risk were considered in the early stages of siting and design and embedded measures have been intrinsic to the design of the Project to reduce and where possible avoid flood risks and impacts on the water environment. Embedded mitigation measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, which is secured by **Application Document 3.1 Draft Development Consent Order** and include:<br>• Where possible the design of the temporary haul roads has sought to utilise existing bridges and culverts in order to avoid physical disturbance, impacts on flow regimes.<br>• Large or sensitive watercourses, for example those designated as main river, and those with WFD status, will be crossed by the temporary haul road using temporary clear span bridges to avoid in-channel works and associated effects.<br>• Application of appropriate stand-off distances of 10 m have been applied to watercourses to avoid directs effects where practicable.<br>Temporary infrastructure such as construction compounds, lay down areas (as well as areas where impermeable material will be installed or where heavy equipment would be used) and construction access tracks would be drained using sustainable drainage systems (SuDS) techniques that are suitable for local ground conditions and topography and which are designed to accommodate a 1 in 10-year (10% Annual Exceedance Probability) event, plus a 40% allowance for climate change resilience. These areas will be reinstated after completion of the temporary works, as agreed with the landowner. In addition, measures to control and manage construction impacts are set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments** including those detailed in a Flood Warning and Evacuation Plan, and by programming construction activities in floodplains to avoid periods of likely high river levels where practicable.<br>During construction, the FRA concludes that following the application of a sequential approach and a lack of proximate feasible alternatives as detailed in **Application Document 7.17 Strategic Options Report Including Needs Case**, three construction compounds are located in Flood Zone 3, in addition to some temporary haul roads and construction access which must necessarily be located in Flood Zones 2 and 3. The FRA concludes, however, that these risks would be reduced and managed by implementing a range of mitigation measures set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, including those detailed in a Flood Warning and Evacuation Plan, and by programming construction activities in floodplains to avoid periods of likely high river levels where practicable. Following the implementation of these measures, the residual risk is medium for fluvial and tidal flooding, and low for surface water and groundwater. Overall the construction of the Project results in no significant effects in relation to flood risk, as set out in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**.<br>During operation, due to its linear nature and the geographical extent of the Project, while the siting of pylons within the defended floodplain has largely been avoided, some operational Project components, namely pylons, must necessarily be located in Flood Zones 2 and 3 with some areas being within the floodplain.<br>The Exception Test set out in Policy F6 of the NPPF is therefore triggered, and the FRA provides the evidence of how the Project satisfies this test. The FRA concludes that, with regard to the test, the Project is a NSIP that would play an important role in delivering renewable electricity efficiently, |

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
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| | | reliably and safely and would support the UK's move towards net zero, therefore it would provide wider sustainability benefits to the community that outweigh flood risk.<br>In addition, permanent Project infrastructure which lies within areas at risk of fluvial or tidal flooding only comprises a small number of pylons. These pylons are resilient to flooding, given their concrete bases and metal lattice structures which would not be impacted by floodwaters, and so ensure the Project would be safe and could continue to operate in times of flood. A suite of measures would be adopted, as described in Table 3.1 of **Application Document 7.13 FRA** and also set out in **Application Document 7.3 Register of Environmental Actions and Commitments** which is secured by **Application Document 3.1 Draft Development Consent Order**, to prevent flood risk increases during operation of the Project.<br>Following consultation with the Environment Agency in accordance with paragraphs 5.8.18 to 5.8.20 of NPS EN-1, it was stipulated that compensatory storage for pylons within the floodplain would be required. Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 FRA** sets out the proposed location of floodplain storage compensation areas that are proposed on land outside of the floodplain. The flood storage compensation proposals outlined in Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 FRA** provide evidence that the Project, on the implementation of flood compensation areas within the same floodplain cell, will not increase the overall water level and therefore does not increase flood risk elsewhere. Furthermore, a conservative approach to calculating floodplain storages losses was taken, meaning the suggested volume for compensation areas likely exceeds the requirement. As such, there is the opportunity for the Project to reduce flood risk overall via these floodplain storage compensation areas.<br>It is therefore concluded that during the operational phase, the Project is considered to be at low risk of flooding from all sources assessed due to the mitigation measures built into its design. The Project is not anticipated to increase flood risk elsewhere during its operation as any losses of floodplain storage would be compensated for. New impermeable surfaces would be very localised to pylon bases and rainfall runoff from these areas would be attenuated by surrounding reinstated vegetation and would soak back into the ground.<br>The Exception Test is therefore concluded to be satisfied, as the Project would bring significant benefits via its delivery of safe, reliable, and renewable electricity; would not result in an increase in flood risk elsewhere; and has been designed to be resilient to flooding throughout its lifetime.<br>*Contamination, BMV and Soils*<br>The Project is likely to have a significant adverse effect on BMV land during the construction and operation of the Project, with the permanent removal of 34.4 hectares of BMV land, amounting to 2.27% of agricultural land within the Order Limits. It is considered that although this effect would be significant and permanent, the benefits and urgent need of the Project in terms of providing sufficient capacity to the network in the North of England and Midlands, in order to facilitate the connection of planned renewable energy projects and help to deliver the UK's net zero target and the Clean Power 2030 mission, would outweigh this loss.<br>*Decommissioning*<br>Decommissioning was scoped out of the assessment and if therefore not applicable to the Project. |
| Policy EC6: Protecting Mineral Resource | A. Mineral Safeguarding Areas for sand and gravel, crushed rock, limestone, industrial chalk, clay, and silica sand are identified on the Policies Map Update.<br>B. Within or adjacent to Mineral Safeguarding Areas, non-mineral development, which would adversely affect the viability of exploiting the underlying or adjacent deposit in the future, will only be supported where it can be demonstrated that the:<br>1. Underlying or adjacent mineral is of limited economic value;<br>2. Need for the development outweighs the need to safeguard the mineral deposit; | National Grid acknowledges that parts of the study area for the Project assessments are located within an MSA, which also extends beyond the study area, across areas of the East Riding of Yorkshire, North Lincolnshire and Nottinghamshire, and that the Order Limits pass through the Wienerberger Ltd clay works.<br>Whist it is acknowledged that some temporary sterilisation of some small areas of minerals resources may occur associated with the Project, these resources could become available in the future. **Application Document 6.12.A3 Environmental Statement Appendix 12.3 Preliminary Qualitative Mineral Resource Assessment** concludes it would not be practical to extract the mineral prior to development. |

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
|---|---|---|
| | 3. Non-mineral development can take place without preventing the mineral resource from being extracted in the future;<br>4. Non-mineral development is temporary in nature; or<br>5. Underlying or adjacent mineral deposit can be extracted prior to the non-mineral development proceeding, or prior extraction of the deposit is not possible. | The Project is considered to be of national significance, and therefore the need for the Project outweighs the need to safeguard the mineral deposit. Based on the national significance of the Project and that all affected authorities have more than the seven-year land bank of sand and gravel, as required by the NPPF, and sufficient additional safeguarded areas, it is considered that the potential impact of sterilising the small volume associated with the Project is acceptable without further consideration or mitigation. |
| Policy ENV1: Integrating high quality design | A. All development proposals will:<br>1. Contribute to safeguarding and respecting the diverse character and appearance of the area through their design, layout, construction and use;<br>2. Seek to minimise the demand for energy and make prudent and efficient use of natural resources, particularly land, energy and water; and<br>3. Seek to maximise the use of decentralised and renewable or low carbon technologies.<br>B. Development will be supported where it achieves a high quality of design, which optimises the potential of the site and contributes to a sense of place and beauty. This will be accomplished by:<br>1. Having regard to the specific characteristics of the site's wider context and the character of the surrounding area;<br>2. Incorporating an appropriate mix of uses on the site;<br>3. Having an appropriate scale, density, massing, height and material;<br>4. Having regard to the amenity of existing or proposed properties;<br>5. Ensuring the proposal does not have an unacceptable impact on existing uses in the surrounding area;<br>6. Ensuring the proposal does not result in unreasonable restrictions being placed on existing uses;<br>7. Having an adaptable layout for sites and/or buildings, which takes into account the needs of future users;<br>8. Having regard to healthy lifestyles;<br>9. Incorporating energy efficient design and arrangements to manage waste;<br>10. Incorporating hard and/or soft landscaping, alongside boundary treatment of an appropriate scale and size, to enhance the setting of buildings, public space and views;<br>11. Consider the potential for public transport and active forms of travel in the layout of streets and paths within new development;<br>12. Promoting equality of safe movement for all within the site, including access, egress and minimising highway safety risks;<br>13. Having regard to features that minimise crime and the perception of crime;<br>14. Considering the use of public art, where the sense of place and public access or view would justify it;<br>15. Ensuring infrastructure, including green infrastructure, drainage, SuDS and flood mitigation, are well integrated into the development;<br>16. Ensuring that new streets are tree-lined, unless this would be inappropriate, and that opportunities are taken to incorporate trees elsewhere in developments. Proposals should ensure appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible; | The location and design of the Project is the result of a comprehensive site selection process that was led by the consideration of good design and key environmental and planning constraints to avoid and minimise impacts as early as possible. **Application Document 5.9 Design Development Report** explains where design choices have sought to reduce the environmental effects of the Project and demonstrates that the design has incorporated embedded mitigation to avoid or reduce significant environmental effects where practicable. **Application Document 7.3 Register of Environmental Actions and Commitments** details the embedded measures and additional mitigation measures that have been identified through the Environmental Impact Assessment to avoid or reduce likely significant environmental effects.<br>**Application Document 7.17 Strategic Options Report Including Needs Case** and section 3 of **Application Document 5.5 Planning Statement** explain that the Project is one of the essential network reinforcements needed to deliver the UK's net zero target and the Clean Power 2030 mission. The **Application Document 5.5 Planning Statement** and **Application Document 7.17 Strategic Options Report Including Needs Case** set out that the Project, if consented, would support the UK's net zero target by reinforcing the electricity transmission network between the North of England and the Midlands and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The Project would help meet future energy requirements and support the transition to a net zero economy, and support security and reliability of supply. Without reinforcement, the capacity of the existing network is insufficient to accommodate the connection of proposed new power sources connecting in the area.<br>**Application Document 7.17 Strategic Options Report Including Needs Case** sets out why the Project is needed and what strategic options were considered to meet the identified need case, taking account of environmental, technical, cost and socio-economic considerations including specific characteristics of the site's wider context and the character of the surrounding area, amenity, existing uses, transport and access in accordance with this policy.<br>Following the selection of the strategic option, **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** and **Application Document 7.19 Supplementary Corridor and Routeing Report** explain how the routeing and siting of the Project was undertaken and the reasons for the selection of the emerging preferences which were consulted upon during two non-statutory consultations. These appraisals took into account the existing context and potential impacts relating to landscape and visual, ecology, flood risk, historic environment, settlement and population, tourism and recreation and current planning applications, alongside technical and cost consideration.<br>Following feedback from the non-statutory consultations and further design development, **Application Document 7.20 Design Development Report - 2025** set out the defined proposal developed following the non-statutory consultations, which was put forward to statutory consultation (18 February to 15 April 2025).<br>**Application Document 5.9 Design Development Report** summarises the design development and sets out how the design of the Project evolved from statutory consultation to the Project as applied for, taking into account feedback received from stakeholders.<br>**Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered** provides an overview of the main alternatives considered at each stage of the design development. |

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
|---|---|---|
| | 17. Incorporating, nature conservation and biodiversity net gain into the proposal;<br>18. Incorporating, where appropriate, a reduction in the vulnerability and increase in resilience to climate change;<br>19. Considering the use of the latest technologies and materials to improve building quality;<br>20. Considering the appropriate use of local materials, architectural styles and features that have a strong association with the area's landscape, geology and built form, with particular attention to heritage assets; and<br>21. Safeguarding the views and setting of outstanding built and natural features and skylines within and adjoining the East Riding, including those features identified in Policies A1-A6.<br>C. Innovative design incorporating new materials and technologies will be supported where the local context and sub areas, with their diverse landscapes, geologies, historical background and built form, have been fully considered as part of the design process. | As set out in **Application Document 5.9 Design Development Report**, the Project delivers good design by avoiding or reducing impacts on environmentally sensitive receptors as far as practicable through routeing and siting, and making efficient use of land by maximising close parallel routeing with existing electricity transmission infrastructure where reasonably practicable. Construction impacts have been reduced through the refinement of access arrangements, working areas and construction methodologies. Whole-life operational performance maintenance requirements and asset resilience have also informed design decisions. Embedded environmental mitigation has been incorporated into the design wherever reasonably practicable, as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Key measures relevant to this policy include:<br>• Vegetation will be retained where practicable. Where vegetation is lost and trees cannot be replaced in situ due to the restrictions associated with operational safety, replacement vegetation will be planted as close by as practicable and will complement the landscape character and be sympathetic to the local habitat type in order to provide a high biodiversity value.<br>• Mitigation planting is proposed and the habitats to be created and/or enhanced in these areas (on-site mitigation) have been designed to provide landscape and visual mitigation while also offering ecological value. Along the proposed overhead line, 60 landscape mitigation planting areas have been identified within the Order Limits to provide landscape and visual mitigation, whilst also delivering ecological benefits.<br>• National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project will achieve a minimum of 10% BNG (through on-site and off-site BNG) and has undertaken a BNG assessment (based on Natural England's Statutory Biodiversity Metric 2024 version (as of June 2025)) which is presented in **Application Document 7.1 Biodiversity Net Gain Report**.<br>• An Outline Construction Worker Travel Plan is included within **Application Document 7.4 Outline Construction Traffic Management Plan** which sets out the principles, objectives and minimum requirements for managing construction workforce travel in a sustainable manner including minimising the number of single-occupancy car trips generated by the construction workforce; promoting sustainable modes of travel where reasonably practicable, including walking, cycling, public transport and shared transport; managing workforce travel in a way that minimises impacts on the local highway network and surrounding communities; and ensure construction workforce travel is planned, monitored and managed in a transparent and auditable manner.<br>• A SWMP will be developed prior to construction. The SWMP will include but not be limited to waste forecasts; how waste will be reduced, re-used, managed and disposed of in accordance with the waste hierarchy; identification of recovery routes; and actual waste figures once work has begun.<br>The use of design principles has guided the development of the Project, which reflects the acknowledgement in the NPSs that good design for electricity transmission infrastructure is achieved through infrastructure that is safe, secure and resilient, and which responds appropriately to its environmental and community context, and is not defined solely by visual appearance. The principles considered include the Holford guidance, undergrounding policy, local planning policy, NIC Design Principles (National Infrastructure Commission, 2020), Planning Inspectorate's Advice on Good Design and on Linear Projects (Planning Inspectorate, 2025), technical design requirements set out in legislation and policy and other relevant legislation and policies.<br>In summary, the Project delivers good design that is sustainable, in accordance with the design policies set out in the NPSs that acknowledge that the context of any design decisions must reflect the need to efficiently deliver large-scale energy infrastructure, and therefore (as recognised in national policy), the extent to which a scheme can contribute to the enhancement of the quality of the area is limited. |

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
|---|---|---|
| Policy ENV2: Promoting a high quality landscape | A. Development proposals should be sensitively integrated into the existing landscape, demonstrate an understanding of the intrinsic qualities of the landscape setting and, where possible, seek to make the most of the opportunities to protect and enhance landscape characteristics and features. To achieve this, development should:<br>1. Protect the character and individual identity of settlements by maintaining their physical separation, including through the maintenance of the Key Open Areas identified in Policies A1-A6, and on the Policies Map, where there is a risk of settlement coalescence.<br>2. Protect and enhance important open spaces within settlements, which contribute to their character.<br>3. Ensure all important hedgerows and trees are retained unless their removal can be justified in the wider public interest. Where important hedgerows and any trees are lost replacements will usually be required on-site.<br>4. Maintain or enhance the character and management of woodland where appropriate.<br>5. Retain, not detract from, and enhance wetland and water feature characteristics.<br>6. Protect and enhance views across valued landscape features, including flood meadows, chalk grassland, lowland heath, mudflats and salt marsh, sand dunes and chalk cliffs.<br>7. Protect and enhance the undeveloped coast.<br>B. Proposals should protect and enhance the existing landscape character as described in the East Riding Landscape Character Assessment, in particular within the following Important Landscape Areas as shown on the Policies Map Update:<br>1. The Yorkshire Wolds, with special attention to ensuring developments are of an appropriately high quality and will not adversely affect the historic and special character, appearance or conservation value.<br>2. The Heritage Coast designations at Flamborough and Spurn Head, ensuring that proposals are compatible with their special character.<br>3. The River Derwent Corridor and Lower Derwent Valley, which includes the Pocklington Canal.<br>4. The Thorne, Crowle and Goole Moors.<br>C. Proposals should have regard to the existing historic character as described in the Historic Landscape Characterisation of the East Riding of Yorkshire and Kingston Upon Hull. | Landscape and visual matters were considered in the early stages of siting and design of the project and embedded measures have been intrinsic to the design of the Project to reduce and where possible avoid landscape and visual effects. **Application Document 5.9 Design Development Report** and **Application Document 7.17 Strategic Options Report Including Needs Case** both provide an overview of the design rationale for the Project. They explain how the Project has sought to avoid or reduce significant environmental effects, including landscape and visual effects, wherever practicable, from the initial option identification and selection stage up to the refinement of the Project in response to feedback, further assessments and design work. Embedded measures include:<br>• Where possible the Project has been designed to be parallel or close parallel with the existing overhead lines to reduce the spread of effects from overhead lines in the landscape. Route Sections where close parallel routeing has been possible, taking into account constraints present along the existing overhead lines as well as technical complexity, include Route Section A which has been routed to minimise the effects on the Yorkshire Wolds Important Landscape Area, and Route Section B between the River Ouse and Luddington.<br>• Where possible and where the Project is not close parallel with the existing overhead lines, the Project has been designed to avoid existing vegetation. Examples include using existing field entrances for access to avoid unnecessary removal of mature hedgerows and trees throughout the length of the Project.<br>Additional mitigation measures have also been identified to further reduce significant effects on landscape and visual receptors, and include additional scrub, tree, hedgerow and woodland planting to mitigate losses and increase connectivity as set out in **Application Document 7.8 Outline LEMP** which is secured by **Application Document 3.1 Draft Development Consent Order**.<br>Control and management measures to mitigate the impacts of construction on the landscape and visual receptors will be carried out in accordance with **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>**Application Document 6.6 Environmental Statement Chapter 6 Landscape** concludes that, following the implementation of the proposed embedded and additional mitigation, there would not be any significant adverse effects on any designated landscapes, which includes the Yorkshire Wolds Important Landscape Area.<br>Although the Yorkshire Wolds Important Landscape Area is not currently designated as a national landscape, on 4 February 2026, Natural England issued notice of intention to 'make' the designation Order for the proposed Yorkshire Wolds AONB (currently Yorkshire Wolds Important Landscape Area). The Draft Yorkshire Wolds AONB (Designation) Order 2026 (Natural England, 2026) identifies the areas to be designated. At its closest, near Market Weighton, the area proposed for designation is approximately 11.4 km from the Limits of Deviation. At this distance, the special qualities and statutory purposes of the AONB would not be significantly affected by the Project and no further assessment has been undertaken.<br>Therefore, there would be no effects on any National Park, The Broads or National Landscape as a result of the Project. |
| Policy ENV3: Valuing our Heritage | A. Proposals that positively and proactively conserve and enhance the East Riding's Historic Environment and heritage assets will be supported. This Historic Environment reinforces local distinctiveness, helps create a sense of place and can assist in the delivery of the economic wellbeing of the area. Key features that contribute to the East Riding's distinctive historic character, include, but are not limited to:<br>1. Those elements that contribute to the special interest of Conservation Areas, including the landscape setting, open spaces, key views and vistas, and important | National Grid has undertaken an iterative design process taking account of policy requirements, historic landscape character assessments and desk-based and fieldwork analysis in order to minimise and avoid, where possible, harm to the historic environment. In accordance with the mitigation hierarchy, the design of the Project has sought to avoid, reduce or mitigate potentially significant adverse effects on designated and non-designated heritage assets. Design decisions have been made to balance the need to avoid and reduce impacts on heritage assets, along with other environmental, social and operational considerations. Embedded mitigation measures are also incorporated into the design to minimise impacts as far as practicable, as secured in **Application Document 7.3 Register of Environmental Actions and Commitments**. |

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
|---|---|---|
| | unlisted buildings identified as contributing to the significance of each Conservation Area in its appraisal;<br>2. Listed Buildings and their settings;<br>3. Scheduled Monuments;<br>4. Historic Parks and Gardens and key views in and out of these landscapes;<br>5. The dominance of the church towers and spires as one of the defining features of the landscape, such as those of Holderness and the Wolds;<br>6. Heritage assets associated with the historic development and defence of the East Yorkshire Coast and the foreshore of the Humber Estuary;<br>7. The historic, archaeological and landscape interest of the Registered Battlefield at Stamford Bridge;<br>8. The historic cores of medieval settlements, and, surviving former medieval open field systems with ridge and furrow cultivation patterns or garth plots;<br>9. The nationally significant archaeology of the Yorkshire Wolds; and<br>10. Those parts of the nationally important wetlands where waterlogged archaeological deposits survive.<br>B. In determining applications, proposals that conserve or enhance the significance of a heritage asset and its setting should be supported. Development that will cause harm to the significance of a heritage asset will only be granted where clear and convincing justification for the proposed harm can be demonstrated in line with national planning policy requirements. Where harm cannot be avoided the applicant will need to prepare a scheme that minimises and mitigates the harm caused by development and demonstrate that the harm is appropriately weighed against public benefits in accordance with national policy.<br>C. Proposals that would retain, and enhance the significance of a non-designated heritage asset, or its contribution to the character of a place will be supported where it is in accordance with national planning policy.<br>D. Proposals which seek to safeguard the future of designated heritage assets at risk, including putting them to an appropriate, viable and sustainable use and conserve their significance will be supported where it is in accordance with national planning policy.<br>E. Proposals that impact on a heritage asset (including its setting) should be accompanied by a heritage statement; proportionate to the asset's significance and in line with national planning policy.<br>F. Considerable weight will be given to the preservation and protection of non-designated archaeological remains. Development proposals on sites that have archaeological potential must include a desk-based assessment and, where necessary, a field evaluation report with their planning application. To minimise conflict and ensure mitigation of damage, preservation of the remains in situ is the preferred solution. However, where the significance of archaeological remains is such that their preservation in situ is not essential and is not feasible, a written scheme of investigation and programme of archaeological works aimed at achieving preservation by record will be required to be submitted to and agreed with the local planning authority. | Measures relevant to the control and management of impacts to the historic environment during construction have been included within Application Document 7.2 Outline Code of Construction Practice and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Further measures relevant to archaeology are set out within **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**, with archaeological works and management measures during the construction, operation and maintenance phases secured through **Application Document 7.10 Outline Cultural Heritage Management Plan**.<br>**Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** concludes that the Project would result in significant adverse effects on the setting of 15 designated heritage assets in East Yorkshire. The Heritage Statement of Harm (Appendix A of **Application Document 5.5 Planning Statement**) concludes that the majority of these would result in less than substantial harm, concluding that in total the Project would result in less than substantial harm to 24 designated heritage assets, 4 Conservation Areas and one non-designated asset in East Yorkshire. One of these assets, Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190) which is a scheduled monument, is expected to experience less than substantial harm at the higher end of the scale.<br>With regard to less than substantial harm at the higher end of the scale for Hall Garth moated site, associated drainage channels and fishpond (NHLE 1013190), it was acknowledged during the routeing and siting exercise in in Application Document 7.18 Corridor and Preliminary Routeing and Siting Study that the preferred alignment would adversely affect the setting of the Hall Garth Moated site. This harm was deemed to be unavoidable, due to the need to avoid the significant and number of potential impacts of alternative routes in this location, including effects on the nationally and internationally designated nature conservation sites of the Humber Estuary and the protected and qualifying bird species at RSPB Blacktoft Sands Nature Reserve, as well as impacts to Grade II listed buildings, residential properties in Ousefleet and in proximity to an eastern route, Ousefleet Village Hall and playing field, agricultural practices and potential further complexities of additional line swaps.<br>Works within the boundary of Hall Garth would only consist of the removal of an existing wood pole electricity line, owned by Northern PowerGrid, which is proposed to be cabled underground beyond the site boundary, in order to avoid direct impacts to the heritage asset.<br>In addition, **Application Document 7.3 Register of Environmental Actions** and Commitments commits to measures relating to third-party access track to NPG-017 as shown on **Application Document 6.4.F4 Environmental Statement Figure 4.4** Third Party Works within the boundary of the Scheduled Monument Hall Garth Moated site (NHLE 1013190). These include no breaking of topsoil and/or below ground disturbance for the duration of the works, and track matting or a similar protected surface will be laid to allow for the movement of construction vehicles to and from the works area.<br>Although the Project results in significant effects to designated heritage assets, there would be no substantial harm to any designated or non-designated heritage assets. It is considered that the overriding public benefits and need for the Project (as outlined in section 3 and 7 of this Planning Statement) would clearly and demonstrably outweigh the significant and less than substantial harm to heritage assets.<br>Therefore, the Project is in accordance with 5.9.11 to 5.9.14, 5.9.16, 5.9.18 to 5.9.22, 5.9.23 to 5.9.29, 5.9.34 and 5.9.37 of NPS EN-1, NPS EN-5, NPPF, NPPG and relevant local policies relating to cultural heritage. |

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| Policy ENV4: International, National and Local Sites of Importance for Biodiversity | A. Proposals that are likely to have a significant adverse effect on statutory designated sites listed in Table 16 (alone or in combination) will be considered in the context of the statutory protection afforded to the site.<br>B. Development should follow the mitigation hierarchy to first avoid, then mitigate, and where necessary compensate for loss or harm to biodiversity. Where loss or harm to a national or local designated site, as set out in Table 16, cannot be avoided, or adequately mitigated, as a last resort compensation for the loss/ harm must be agreed. Development will be refused if loss or significant harm cannot be avoided, adequately mitigated or compensated for.<br>International (Habitats) sites<br>A. Applicants will be required to submit appropriate levels of evidence to enable the council to undertake a Habitats Regulations Assessment (HRA) of the proposal. Evidence will be required to assess the proposal's potential impact (alone or in combination) in view of the international (habitats) site's conservation objectives. This evidence should include the following potential impacts that proposals need to consider:<br>*Recreational Pressure*<br>1. The potential impact of recreational pressure on international (habitats) sites should be considered in proximity to sensitive sites. Proposals for residential and/or tourism accommodation in the following key sensitive locations should;<br>i. in the Humber recreational pressure zone of influence, consider contributing towards strategic programmes aimed at managing the impact of residents and tourists on international (habitats) sites (see Figure 14);<br>ii. avoid development within the Spurn recreational pressure zone of influence shown on the policies map. Proposals for 'roll back' in this zone will have to provide appropriate mitigation to rule out adverse effects on the integrity of international (habitats) sites;<br>iii. consider the impact of recreational pressure when located within 5km of the Lower Derwent Valley international (habitats) sites; and<br>iv. consider the impact of recreational pressure on Flamborough Head international (habitats) sites.<br>*Functionally Linked Land*<br>1. Development proposals located within proximity of either the Humber Estuary or Lower Derwent Valley international (habitats) sites will have to consider whether development results in the loss of 'functionally linked land' for mobile species associated with the international (habitats) site. This proximity consideration applies where the application site is either:<br>i. greater than 2 hectares as a site or as part of a wider plot, field or open area within 2km of any part of the designated sites; or<br>ii. greater than 5 hectares as a site or as part of a wider plot, field or open area between 2km and 10km of any part of the designated sites.<br>2. Development proposals located within 3km of Thorne and Hatfield Moors international (habitats) sites, which impact habitats nightjars may use for feeding, will only be supported where they deliver a net gain in nightjar foraging habitat.<br>3. Where development will result in the loss of functionally linked land, mitigation land that can perform the same function in a suitable location will be required to mitigate adverse effects.<br>Air Quality<br>1. Proposals emitting air pollutants must rule out adverse effects on the integrity of international (habitats) sites. | Following the implementation of embedded, control and additional mitigation measures, **Application Document 6.8 Environmental Statement Chapter 8 Ecology and Application Document 6.9 Environmental Statement Chapter 9 Ornithology** conclude that the Project, based on the current design as set out in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project**, avoids residual significant adverse impacts on all international and national and local statutory designated sites for nature conservation including SSSIs, non-statutory designated sites, priority habitats, important hedgerows and other terrestrial habitats.. This has been achieved by following the mitigation hierarchy with the design process, and in accordance with the Holford Guidance, to avoid impacts where possible.<br>It should be noted that this conclusion is based on the assessment surveys that have been undertaken thus far for the Project. Additional 2026 surveys are currently continuing, and any additional assessment results would be provided in addendum reports following submission of the DCO.<br>**Application Document 6.8 Environmental Statement Chapter 8 Ecology** concludes that there would be a residual significant adverse effect on Yellow birds-nest, which is a wildflower, due to the permanent loss of plants due to pylon working areas (pylons 4ZQ78 and 4ZQ77), access, stringing works, and overhead line clearance (between 4ZQ78 and 4ZQ76) requiring felling and management of trees within woodland at or in the vicinity of the top of Bilks Hill, and therefore the associated fungal network that the plant is dependent on. As noted above and in Table 8.21 of **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, mitigation is proposed to ensure there would be no direct effects or encroachment on yellow bird's nest, however residual significant effects remain due to impacts to the fungal network that the flower relies on. The overriding public benefits and need for the Project are considered to outweigh this harm. There would be no other significant adverse effects on any other species or protected species, including all bird species.<br>It is also noted that if the LoD are used during construction near Jillywood Lane LWS, then habitats could be impacted in two locations. This would result in a significant adverse effect because the LWS has been recorded by the Project as containing Woodland with Characteristics of Ancient Woodland. Therefore, as a worst case, this habitat is considered irreplaceable. If the LoD is used, and trees are required to be removed at Jillywood Lane LWS, mitigation set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments** would ensure that any trees removed will not be removed to below ground level and not grubbed out to reduce the impact to soil and ground flora. Compensation would also be provided via new trees to be planted in proposed mitigation planting areas, outside the LWS, which are described in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and shown in **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.<br>A significant residual adverse effect is also anticipated on Socken Wood and Wood Farm Woodlands with Characteristics of Ancient Woodland. Additionally, if the LoD are used in one area, a significant residual effect is anticipated on one veteran tree.<br>National Grid considers that it has applied the mitigation hierarchy appropriately in designing the Project to avoid or reduce as far as possible, adverse effects on irreplaceable habitats. The location, routeing and siting of the Project has been designed to avoid and/or reduce impacts on designated ancient woodland and veteran trees as far as practicable.<br>It is acknowledged that significant effects are reported on some areas of Woodlands with Characteristics of Ancient Woodland, which would result in the loss or deterioration of irreplaceable habitats at Socken Wood and Wood Farm. Mitigation is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan and Application Document 7.3 Register of Environmental Actions and Commitments** to ensure that impacts are reduced as far as practicable, and compensation planting with a ratio of 3:1 is proposed and is secured in **Application Document 7.8 Outline Landscape and Ecology Management Plan**. |

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
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| | Water Quality<br>1. Proposals discharging water pollutants, such as nitrogen and phosphorus, must rule out adverse effects on the integrity of international (habitats) sites.<br>2. Proposals that discharge foul or surface water into Hornsea Mere's international (habitats) site hydrological catchment will have to demonstrate that foul and surface water can be appropriately addressed so that developments are nutrient neutral. Contaminants should be restricted from entering the Mere's hydrological system.<br>D. Mitigation will be required for a development site where adverse effects cannot be ruled out. Where mitigation is not possible to rule out adverse effects on the integrity of an international (habitats) site, the development will not be permitted unless it can be conclusively demonstrated that:<br>1. There are no feasible alternative solutions that would be less damaging or avoid damage to the site;<br>2. There are imperative reasons of overriding public interest for the development; and<br>3. The necessary compensatory measures can be secured.<br>E. Sites that have been identified for mitigation or compensatory land are shown on the Policies Map and will be protected for the purposes for which they have been identified.<br>National<br>F. Proposals that are likely to have an adverse effect on a national site (alone or in combination) will not normally be permitted, except where the benefits of development in that location clearly outweigh both the impact on the site and any broader impacts on the wider network of national sites. This should consider adverse impacts such as recreational pressure, functionally linked land, air quality, and water quality.<br>Local<br>A. Development resulting in loss or significant harm to a local site, or habitats or species supported by local sites, whether directly or indirectly, will only be supported if it can be demonstrated that there is a need for the development in that location and the benefit of the development outweighs the loss or harm. | As the design currently stands and should the LoD not be used in Route Section A, the Project would not result in the loss or deterioration of any designated (on the AWI) ancient woodland or trees, or veteran trees. In the event that the LoD is used and the loss of one veteran tree is required, compensation planting (with a replanting ratio of 30:1) would be implemented as secured in **Application Document 7.3 Register of Environmental Actions and Commitments** and agreed with Natural England and East Riding of Yorkshire Council.<br>Mitigation and compensation planting (ratio of 3:1) is also proposed if the Project would result in the loss or deterioration of Woodland with Characteristics of Ancient Woodland within Jillywood Lane LWS (if the LoD are used in this location). These are secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Therefore, in accordance with paragraph 5.4.55 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) it is considered that the overriding public need and benefit of the Project (as set out in sections 3 and 7.5 of the **Application Document 5.5 Planning Statement**) would clearly outweigh the loss or deterioration of the habitat, and it would therefore be wholly exceptional. In addition, a relevant compensation strategy is provided within the Order Limits for potential impacts as far as possible and is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>In addition, National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project will achieve a minimum of 10% BNG (through on-site and off-site BNG) and has undertaken a BNG assessment (based on Natural England's Statutory Biodiversity Metric 2024 version (as of June 2025)) which is presented in **Application Document 7.1 Biodiversity Net Gain Report**.<br>The Project does not comprise recreational development therefore there would be no impacts relating to this.<br>The Appropriate Assessment in the HRA Report concludes that the Project (either alone or in-combination with other plans or projects) would not result in an adverse effect on the integrity of a European site following the implementation of mitigation. Embedded, control and management and additional mitigation measures that are proposed to minimise or avoid likely significant effects are set out in the HRA Report, as well as where relevant in **Application Document 7.3 Register of Environmental Actions and Commitments, Application Document 7.2 Outline Code of Construction Practice, Application Document 7.8 Outline Landscape and Ecology Management Plan, Application Document 7.5 Outline Soil Management Plan, Application Document 7.7 Outline Noise and Vibration Management Plan, and these documents will be secured by Application Document 3.1 Draft Development Consent Order** |
| Policy ENV5: Enhancing biodiversity and geodiversity | A. Proposals will be supported where they:<br>1. Conserve, restore, enhance or recreate biodiversity and geological interests including the priority habitats and species, irreplicable habitats and Local Sites (identified in Table 16); and<br>2. Safeguard, enhance, create and connect habitat networks in order to:<br>i. protect, strengthen and reduce fragmentation of habitats;<br>ii. create a coherent ecological network that is resilient to current and future pressures;<br>iii. conserve and increase populations of species; and<br>iv. promote and enhance green infrastructure. | As set out above, the Project's aim is to retain existing vegetation wherever practicable in accordance with **Application Document 7.3 Register of Environmental Actions and Commitments**. Where reasonably practicable, construction elements (such as working areas, accesses, laydown and temporary construction compounds) will be kept to the minimum required and micro-sited to avoid impacts on ecologically important features. Overseen and informed by the ECoW and ArbCoW, sensitive habitats will be demarcated to ensure contractors protect as much vegetation as possible.<br>As a general principle, all land which is temporarily impacted by the Project will be reinstated where practicable to its pre-construction condition land use. In addition to the reinstated habitats across the route, there will also be 'mitigation planting areas' located in key locations through the Project. The locations of these areas are detailed within **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design** and Table 8.2 of **Application Document 7.8** |

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
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| | Local Nature Recovery<br>B. Proposals should further the aims of the Local Nature Recovery Strategy and national Nature Recovery Network and other relevant strategic landscape-scale biodiversity initiatives.<br>Biodiversity Net Gain<br>C. Proposals must achieve a measurable biodiversity net gain at least in line with the most up to date national requirements, in addition to the measures required in ENV4.<br>Water Framework Directive<br>D. Proposals that include altering river channels, lakes, estuaries, coastal waters, or their banks, propose structures that break continuity or alter flow, or EIA developments that are determined to have a likely significant effect on the water environment, must undertake a Water Framework Directive Assessment to show that the proposal will:<br>1. Not cause deterioration of the Water Framework Directive status of any water body; and<br>2. Will not prevent any water body from reaching targets set in the River Basin Management Plan. | **Outline Landscape and Ecology Management Plan** sets out a list of the mitigation planting areas proposed within the Order Limits.<br>The habitats to be created and/or enhanced in these areas (on-site mitigation) have been designed to provide landscape and visual mitigation while also offering ecological value. Along the proposed overhead line, 60 landscape mitigation planting areas have been identified within the Order Limits to provide landscape and visual mitigation, whilst also delivering ecological benefits. Indicative landscape proposals for each of these areas are shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.<br>National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project will achieve a minimum of 10% BNG (through on-site and off-site BNG) and has undertaken a BNG assessment (based on Natural England's Statutory Biodiversity Metric 2024 version (as of June 2025)) which is presented in **Application Document 7.1 Biodiversity Net Gain Report**.<br>The potential for the Project to compromise objectives established under the Water Framework Directive Regulations has been assessed in **Application Document 7.12 Water Framework Directive Assessment**. The assessment confirms no significant effects are anticipated on water quality and resources as a result of the Project. |
| Policy ENV6: Managing Environmental Hazards | A. Environmental hazards, such as flood risk, coastal change, nutrient deposition, aerial pollution, groundwater pollution and other forms of pollution, will be managed to ensure that development does not result in unacceptable consequences to its users, the wider community, and the environment.<br>Flood Risk<br>B. The risk of flooding to development, from all sources both now and in the future, will be managed by applying a sequential test to ensure that development is steered towards areas of lowest risk, as far as possible. The sequential test will, in the first instance, be undertaken on the basis of the East Riding Strategic Flood Risk Assessments (SFRA) and the Environment Agency's Flood Maps, within appropriate search areas. The order of preference for the sequential test is set out in the relevant SFRA, with preference given to reasonably available sites that are in the lower risk / hazard zones. Where necessary, development must also satisfy the exception test.<br>C. If, following application of the sequential test, it has not been possible to successfully steer development to a site at low risk of flooding from all sources now and in the future, a sequential approach will be taken to site layout and design, aiming to steer the most vulnerable uses towards the lowest risk parts of the site and upper floors.<br>D. Flood risk from all sources will be proactively managed by:<br>1. Ensuring that new developments:<br>i. limit surface water run-off to existing run-off rates on greenfield sites, on previously developed land reduce existing run-off rates by a minimum of 30 per cent , or to greenfield run-off rate, and in the Living With Water Area (see Figure 15 and the Policies Map), support proposals that make a reduction in runoff beyond greenfield rates;<br>ii. do not increase flood risk within or beyond the site;<br>iii. incorporate Sustainable Drainage Systems (SuDS) into major development proposals and proposals at risk of flooding, unless demonstrated to be inappropriate;<br>iv. ensuring SuDS provide multi-functional benefits, where appropriate;<br>v. do not culvert or otherwise build over watercourses, unless supported by the Risk Management Authority and an appropriate the Water Framework | **Application Document 7.13 Flood Risk Assessment** has been prepared which assesses whether the Project is likely to be at risk of flooding or is likely to increase flood risk elsewhere. The FRA concludes that from the outset of the Project, a sequential approach has been taken to siting infrastructure for the Project, particularly those elements that are vulnerable to inundation, as evidenced in **Application Document 7.17 Strategic Options Report Including Needs Case**.<br>The water environment and flood risk were considered in the early stages of siting and design and embedded measures have been intrinsic to the design of the Project to reduce and where possible avoid flood risks and impacts on the water environment. Embedded mitigation measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, which is secured by **Application Document 3.1 Draft Development Consent Order** and include:<br>• Where possible the design of the temporary haul roads has sought to utilise existing bridges and culverts in order to avoid physical disturbance, impacts on flow regimes.<br>• Large or sensitive watercourses, for example those designated as main river, and those with WFD status, will be crossed by the temporary haul road using temporary clear span bridges to avoid in-channel works and associated effects.<br>• Application of appropriate stand-off distances of 10 m have been applied to watercourses to avoid directs effects where practicable.<br>Temporary infrastructure such as construction compounds, lay down areas (as well as areas where impermeable material will be installed or where heavy equipment would be used) and construction access tracks would be drained using sustainable drainage systems (SuDS) techniques that are suitable for local ground conditions and topography and which are designed to accommodate a 1 in 10-year (10% Annual Exceedance Probability) event, plus a 40% allowance for climate change resilience. These areas will be reinstated after completion of the temporary works, as agreed with the landowner. In addition, measures to control and manage construction impacts are set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments** including those detailed in a Flood Warning and Evacuation Plan, and by programming construction activities in floodplains to avoid periods of likely high river levels where practicable.<br>During construction, the FRA concludes that following the application of a sequential approach and a lack of proximate feasible alternatives as detailed in **Application Document 7.17 Strategic Options Report Including Needs Case**, three construction compounds are located in Flood Zone 3, in addition to some temporary haul roads and construction access which must necessarily be |

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
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| | Directive Assessment, as required by Policy ENV5. Where practical existing culverts should be removed;<br>vi. have a safe access/ egress route from/to areas at low risk of flooding now and in the future or establish that it will be safe to seek refuge at a place of safety within a development;<br>vii. incorporate flood resistant and resilient mitigation that meets the design risk and residual risk now and in the future;<br>viii. are adequately set-back from all watercourses, including culverted stretches, in line with the advice of the relevant Risk Management Authority; and<br>ix. adhere to other relevant SFRA recommendations.<br>2. Supporting proposals for sustainable flood risk management, including the creation of new and / or improved flood defences, water storage areas and other schemes, provided they would not cause unacceptable adverse environmental, social, or economic impacts.<br>3. Supporting the removal of existing culverting and returning these sections to open watercourse.<br>4. Designating areas of Flood Zone 3b (Functional Floodplain) and safeguarding land for current and future flood risk management, on the Policies Map Update.<br>Coastal change<br>E. Development likely to be affected by coastal change will be proactively managed by designating a Coastal Change Management Area (CCMA) on the Policies Map Update.<br>F. Within the CCMA proposals will be supported where it:<br>1. Can be demonstrated that an appropriate temporary development, such as those included in Table 17, will contribute to the local economy and/or help to improve the East Riding's tourism offer; or<br>2. Would involve re-location or roll back of existing development to an alternative location, provided the existing development is in permanent use and is a permanent structure, or is an existing caravan or holiday home park. The alternative location should be a suitable coastal location, including meeting the requirements of Policy ENV4; and<br>3. Is ensured that:<br>i. the development is safe from the risks associated with coastal change for its intended lifespan;<br>ii. the development does not have an unacceptable impact on nature conservation, heritage and/or landscape designations;<br>iii. sites to be vacated as a result of relocation /roll back or expiry of a temporary permission, will be cleared and restored to a natural state, with net sustainability benefits and, where appropriate, public access to the coast; and<br>iv. the development has an acceptable relationship with coastal settlements in relation to character, setting, residential amenity and local services.<br>G. Development proposals for sustainable coastal change management, such as improvements to coastal defences or managed realignment, will be supported where:<br>1. They would not have any unacceptable adverse environmental, social or economic impacts;<br>2. Are in line with the most up to date Shoreline Management Plan; and<br>3. In line with the latest coastal monitoring information. | located in Flood Zones 2 and 3. The FRA concludes, however, that these risks would be reduced and managed by implementing a range of mitigation measures set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, including those detailed in a Flood Warning and Evacuation Plan, and by programming construction activities in floodplains to avoid periods of likely high river levels where practicable. Following the implementation of these measures, the residual risk is medium for fluvial and tidal flooding, and low for surface water and groundwater. Overall the construction of the Project results in no significant effects in relation to flood risk, as set out in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**.<br>During operation, due to its linear nature and the geographical extent of the Project, while the siting of pylons within the defended floodplain has largely been avoided, some operational Project components, namely pylons, must necessarily be located in Flood Zones 2 and 3 with some areas being within the floodplain.<br>The Exception Test set out in Policy F6 of the NPPF is therefore triggered, and the FRA provides the evidence of how the Project satisfies this test. The FRA concludes that, with regard to the test, the Project is a NSIP that would play an important role in delivering renewable electricity efficiently, reliably and safely and would support the UK's move towards net zero, therefore it would provide wider sustainability benefits to the community that outweigh flood risk.<br>In addition, permanent Project infrastructure which lies within areas at risk of fluvial or tidal flooding only comprises a small number of pylons. These pylons are resilient to flooding, given their concrete bases and metal lattice structures which would not be impacted by floodwaters, and so ensure the Project would be safe and could continue to operate in times of flood. A suite of measures would be adopted, as described in Table 3.1 of **Application Document 7.13 FRA** and also set out in **Application Document 7.3 Register of Environmental Actions and Commitments** which is secured by **Application Document 3.1 Draft Development Consent Order**, to prevent flood risk increases during operation of the Project.<br>Following consultation with the Environment Agency in accordance with paragraphs 5.8.18 to 5.8.20 of NPS EN-1, it was stipulated that compensatory storage for pylons within the floodplain would be required. Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 FRA** sets out the proposed location of floodplain storage compensation areas that are proposed on land outside of the floodplain. The flood storage compensation proposals outlined in Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 FRA** provide evidence that the Project, on the implementation of flood compensation areas within the same floodplain cell, will not increase the overall water level and therefore does not increase flood risk elsewhere. Furthermore, a conservative approach to calculating floodplain storages losses was taken, meaning the suggested volume for compensation areas likely exceeds the requirement. As such, there is the opportunity for the Project to reduce flood risk overall via these floodplain storage compensation areas.<br>It is therefore concluded that during the operational phase, the Project is considered to be at low risk of flooding from all sources assessed due to the mitigation measures built into its design. The Project is not anticipated to increase flood risk elsewhere during its operation as any losses of floodplain storage would be compensated for. New impermeable surfaces would be very localised to pylon bases and rainfall runoff from these areas would be attenuated by surrounding reinstated vegetation and would soak back into the ground.<br>The Exception Test is therefore concluded to be satisfied, as the Project would bring significant benefits via its delivery of safe, reliable, and renewable electricity; would not result in an increase in flood risk elsewhere; and has been designed to be resilient to flooding throughout its lifetime.<br>**Application Document 6.15 Environmental Statement Chapter 15 Air Quality** provides an assessment of the likely effects on air quality that would result from the Project and considers the baseline conditions and the likely changes and effects to air quality levels during the construction |

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
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| | Groundwater pollution<br>B. The risk of groundwater pollution will be managed by:<br>1. Avoiding development that has potential to increase the risk of groundwater pollution in source protection zones and where an alternative site outside an SPZ is not available, ensuring that appropriate mitigation measures are employed;<br>2. Preventing inappropriate uses/ activities in SPZ1 and SPZ2, unless adequate safeguards against possible contamination can be agreed;<br>3. Supporting developments which will decrease the risk of pollution in SPZs by cleaning up contaminated land and incorporating pollution-prevention measures;<br>4. Preventing non-mains drainage that would involve sewage, trade effluent or other contaminated discharges, as far as possible; and<br>5. Ensuring re-development of previously developed sites does not contaminate under-lying aquifers.<br>Air Quality<br>C. Development will be supported where opportunities are identified to improve air quality or mitigate a development's air pollution impact, such as through traffic and travel management, and green infrastructure provision and enhancement. | phase. Measures have been built into the design of the Project to avoid or reduce significant air quality effects that may otherwise be experienced during construction. These measures are secured in **Application Document 7.3 Register of Environmental Actions and Commitments**, with further control measures proposed during the construction phase also secured in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.4 Outline Construction Traffic Management Plan**. The assessment confirms there would not be a deterioration in air quality or substantial changes in air quality levels and therefore significant adverse effects on air quality are not anticipated as a result of the Project. |
| Policy C2: Supporting community services and facilities | A. To maintain and improve access to a range of services and facilities in the East Riding, which meet the needs of residents and in appropriate circumstances visitors, proposals will be supported that:<br>1. Retain or enhance existing services and facilities; and/or<br>2. Provide for new services and facilities, including, where appropriate, new mixed use and multipurpose facilities.<br>B. Where services and facilities are provided as part of new development they should be well integrated within that development.<br>C. The loss of health, education, and other services and facilities will only be permitted if:<br>1. It is proved the existing use and proposals for alternative community uses on the site are not economically viable, and there is insufficient demand to support them;<br>2. The loss is part of a wider proposal to improve service provision in the locality; or<br>3. Existing facilities can adequately serve identified needs, in an equally accessible manner.<br>D. The views of the local community, and relevant town or parish council(s), will be important in order to establish the significance of, and demand for, individual facilities and develop solutions to enable their retention. | **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** provides an assessment of the Project's impacts on services and facilities within the Order Limits.<br>The chapter concludes that there would be no significant effects on any existing services or facilities during the construction of the Project. There would be no loss of health, education or other services or facilities.<br>The Project does not propose any new services or facilities. |
| Policy C3: Providing public open space for leisure and recreation | A. Proposals should maintain and/or enhance the quantity, quality and accessibility of open space and address any shortfalls in provision, when measured against the standards set out in Table 18.<br>B. Residential development of 10 or more dwellings or of a combined gross floor space of1000m2 or more that increases demand for open space will be required to provide for an amount of open space per dwelling in line with the following:<br>1. 17.9m2 per 1 Bedroom Dwelling<br>2. 43.6m2 per 2 Bedroom Dwelling<br>3. 69.3m2 per 3 Bedroom Dwelling<br>4. 102.7m2 per 4 or more Bedroom Dwelling | The Project would not result in any loss of existing or proposed open space for leisure and recreation as set out in **Application Document 6.17 Chapter 17 Socio-economics, Recreation and Tourism**. |

| Policy | East Riding of Yorkshire Council Local Plan Update Policy Requirement | Project Compliance |
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| | Where practicable, open space should be provided on-site and link in well with other green infrastructure features as described in Policy S9.<br>C. Proposed open space, including open space required to make up existing shortfalls in provision, will be identified in the Allocations Document Update or a Neighbourhood Plan.<br>D. Existing and proposed open spaces are shown on the Policies Map Update. Proposals resulting in the loss of an existing open space, sports and recreational buildings and land, will only be supported where:<br>1. Assessments of existing provision against local standards demonstrate the land is surplus to requirements for all of the functions that open space can perform; or<br>2. Replacement open space to an equivalent standard or better, in terms of quantity, quality and accessibility, is provided; or<br>3. The development is for alternative sports and recreation provision, for which there is a deficit; and<br>4. The loss of open space would not have an unacceptable detrimental impact on the amenity or character of the area. | |

## 2.6 North Lincolnshire Council Core Strategy (2011)

Table 2.6 – Signposting for Compliance with the North Lincolnshire Council Core Strategy (NLCCS) (2011)

| Policy | North Lincolnshire Council Core Strategy – Policy Requirement | Project Compliance |
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| Policy CS2: Delivering more sustainable development | In supporting the delivery of the spatial strategy set out in policy CS1, as well as determining how future development needs will be met in North Lincolnshire, a sequential approach will be adopted. Development should be focused on:<br>1. Previously developed land and buildings within the Scunthorpe urban area, followed by other suitable infill opportunities within the town, then by appropriate greenfield urban extensions<br>2. Previously developed land and buildings within the defined development limits of North Lincolnshire's Market Towns, followed by other suitable infill opportunities then appropriate small scale greenfield extensions to meet identified local needs<br>3. Small scale developments within the defined development limits of rural settlements to meet identified local needs.<br>Any development that takes place outside the defined development limits of settlements or in rural settlements in the countryside will be restricted. Only development which is essential to the functioning of the countryside will be allowed to take place. This might include uses such as that related to agriculture, forestry or other uses which require a countryside location or which will contribute to the sustainable development of the tourist industry.<br>A 'sequential approach' will also be applied to ensure that development is, where possible, directed to those areas that have the lowest probability of flooding, taking account the vulnerability of the type of development proposed, its contribution to creating sustainable communities and achieving the sustainable development objectives of the plan. Where development does take place in the flood plain, mitigation measures should be applied to ensure that the development is safe. | The Project is a utility infrastructure development and is to be sited outside of the defined settlement boundaries.<br>It is concluded that the Project is of an appropriate scale to its location, due to it being one of the essential network reinforcements in the North of England and the Midlands needed to deliver the UK's net zero target and the Clean Power 2030 mission, and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The reinforcement will also support security and reliability of supply. Without reinforcement, the capacity of the existing network is insufficient to accommodate the connection of proposed new power sources connecting in the area.<br>**Application Document 7.13 Flood Risk Assessment** has been prepared which assesses whether the Project is likely to be at risk of flooding or is likely to increase flood risk elsewhere. The FRA concludes that from the outset of the Project, a sequential approach has been taken to siting infrastructure for the Project, particularly those elements that are vulnerable to inundation, as evidenced in **Application Document 7.17 Strategic Options Report Including Needs Case**.<br>During construction, the FRA concludes that following the application of a sequential approach and a lack of proximate feasible alternatives as detailed in **Application Document 7.17 Strategic Options Report Including Needs Case**, three construction compounds are located in Flood Zone 3, in addition to some temporary haul roads and construction access which must necessarily be located in Flood Zones 2 and 3. The FRA concludes, however, that these risks would be reduced and managed by implementing a range of mitigation measures set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, including those detailed in a Flood Warning and Evacuation Plan, and by programming construction activities in floodplains to avoid periods of likely high river levels where practicable. Following the implementation of these measures, the residual risk is medium for fluvial and tidal flooding, and low for surface water and groundwater. Overall the |

| Policy | North Lincolnshire Council Core Strategy – Policy Requirement | Project Compliance |
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| | All future development in North Lincolnshire will be required to contribute towards achieving sustainable development. Proposals should comply with the overall spatial strategy together with the following sustainable development principles:<br>• Be located to minimise the need to travel and to encourage any journeys that remain necessary to be possible by walking, cycling and public transport. It should be compliant with public transport accessibility criteria as set out in the Regional Spatial Strategy<br>• Be located where it can make the best use of existing transport infrastructure and capacity, as well as taking account of capacity constraints and deliverable transport improvements particularly in relation to junctions on the Strategic Road Network<br>• Where large freight movements are involved the use of rail and water transport should be maximised<br>• Contribute towards to the creation of locally distinctive, sustainable, inclusive, healthy and vibrant communities<br>• Contribute to achieving sustainable economic development to support a competitive business and industrial sector<br>• Ensure that everyone has access to health, education, jobs, shops, leisure and other community and cultural facilities that they need for their daily lives<br>• Ensure the appropriate provision of services, facilities and infrastructure to meet the needs of the development, but where appropriate it is to be recognised that a phased approach may not be required on small scale development proposals.<br>• To be constructed and operated using a minimum amount of non-renewable resources including increasing the use of renewable energy in construction and operation<br>• Take account of local environmental capacity and to improve air, water and soil quality and minimise the risk and hazards associated with flooding, and<br>• Be designed to a high standard, consistent with policy CS5, and use sustainable construction and design techniques.<br>All change will be managed in an environmentally sustainable way by avoiding/minimising or mitigating development pressure on the area's natural and built environment, its existing utilities and associated infrastructure and areas at risk of flooding. Environmental impacts to or from development that cannot be avoided should be adequately mitigated for it to be acceptable. | construction of the Project results in no significant effects in relation to flood risk, as set out in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**.<br>During operation, due to its linear nature and the geographical extent of the Project, while the siting of pylons within the defended floodplain has largely been avoided, some operational Project components, namely pylons, must necessarily be located in Flood Zones 2 and 3 with some areas being within the floodplain.<br>The Exception Test set out in Policy F6 of the NPPF is therefore triggered, and the FRA provides the evidence of how the Project satisfies this test. The FRA concludes that, with regard to the test, the Project is a NSIP that would play an important role in delivering renewable electricity efficiently, reliably and safely and would support the UK's move towards net zero, therefore it would provide wider sustainability benefits to the community that outweigh flood risk.<br>In addition, permanent Project infrastructure which lies within areas at risk of fluvial or tidal flooding only comprises a small number of pylons. These pylons are resilient to flooding, given their concrete bases and metal lattice structures which would not be impacted by floodwaters, and so ensure the Project would be safe and could continue to operate in times of flood. A suite of measures would be adopted, as described in Table 3.1 of **Application Document 7.13 Flood Risk Assessment** and also set out in **Application Document 7.3 Register of Environmental Actions and Commitments** which is secured by **Application Document 3.1 Draft Development Consent Order**, to prevent flood risk increases during operation of the Project.<br>Following consultation with the Environment Agency in accordance with paragraphs 5.8.18 to 5.8.20 of NPS EN-1, it was stipulated that compensatory storage for pylons within the floodplain would be required. Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 Flood Risk Assessment** sets out the proposed location of floodplain storage compensation areas that are proposed on land outside of the floodplain. The flood storage compensation proposals outlined in Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 Flood Risk Assessment** provide evidence that the Project, on the implementation of flood compensation areas within the same floodplain cell, will not increase the overall water level and therefore does not increase flood risk elsewhere. Furthermore, a conservative approach to calculating floodplain storages losses was taken, meaning the suggested volume for compensation areas likely exceeds the requirement. As such, there is the opportunity for the Project to reduce flood risk overall via these floodplain storage compensation areas.<br>The Exception Test is therefore concluded to be satisfied, as the Project would bring significant benefits via its delivery of safe, reliable, and renewable electricity; would not result in an increase in flood risk elsewhere; and has been designed to be resilient to flooding throughout its lifetime.<br>The Project supports the spatial strategy of North Lincolnshire in accordance with this policy through the following measures:<br>• An Outline Construction Worker Travel Plan is included within **Application Document 7.4 Outline Construction Traffic Management Plan** which sets out the principles, objectives and minimum requirements for managing construction workforce travel in a sustainable manner including minimising the number of single-occupancy car trips generated by the construction workforce; promoting sustainable modes of travel where reasonably practicable, including walking, cycling, public transport and shared transport; managing workforce travel in a way that minimises impacts on the local highway network and surrounding communities; and ensure construction workforce travel is planned, monitored and managed in a transparent and auditable manner.<br>• The Project design includes strategically located and optimised construction access tracks (construction access tracks) along the Project alignment to support construction of the Project and reduce the effects of construction traffic movements on the local public highway network during construction. The selection of Primary Access Routes (PARs) has been in part informed |

| Policy | North Lincolnshire Council Core Strategy – Policy Requirement | Project Compliance |
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| | | by a need to avoid impacting areas of population wherever possible and to maximise the use of construction access tracks. PARs are shown on **Application Document 6.14.F1 Environmental Statement Figure 14.1 Primary Access Routes**.<br>• Control and management measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.4 Outline Construction Traffic Management Plan** including temporary traffic regulation orders, temporary traffic management and highway works, construction working hours outside of peak times, and measures to reduce route and journey mileage to and from, and around, the site, and to prevent potential nuisance to residents, businesses and the wider community associated with parking, vehicle movements and access restrictions.<br>• As set out in **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** consideration for the use of alternative transport modes, including both rail and waterborne transport has been undertaken. An assessment of the available transport infrastructure, site access requirements and construction logistics concluded that road transport represents the most practical, efficient, and feasible means of transporting materials, plant, and equipment required for the construction of the Project. Accordingly, road-based transport has been adopted as the primary mode for construction-related movements. Engagement has been undertaken with the Canal and River Trust which confirmed that the use of canals would not be appropriate for construction traffic for the movement of construction materials.<br>• The Project would result in beneficial effects on employment and GVA during the construction period, amounting to, on average, 284 total net jobs per annum during the construction period, of which 57 jobs per annum will be expected to be taken up by residents in the 60-minute Drive Time Area of the Project. The construction of the Project will contribute approximately £39.9 million to the national economy, of which £8 million would likely be within the 60-minute Drive Time Area.<br>• **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** provides an assessment of the Project's impacts on services and facilities within the Order Limits. The chapter concludes that there would be no significant effects on any existing services or facilities during the construction of the Project. There would be no loss of health, education or other services or facilities. The Project does not propose any new services or facilities.<br>• The Project, if consented, would support the UK's net zero target by reinforcing the electricity transmission network between the North of England and the Midlands and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The Project would help meet future energy requirements and support the transition to a net zero economy. |
| Policy CS5: Delivering Quality Design in North Lincolnshire | All new development in North Lincolnshire should be well designed and appropriate for their context. It should contribute to creating a sense of place. The council will encourage contemporary design, provided that it is appropriate for its location and is informed by its surrounding context. Design which is inappropriate to the local area or fails to maximise opportunities for improving the character and quality of the area will not be acceptable.<br>New development in North Lincolnshire should:<br>• Contribute towards creating a positive and strong identity for North Lincolnshire by enhancing and promoting the image of the area through the creation of high quality townscapes and streetscapes.<br>• Ensure it takes account of the existing built heritage from the earliest stages in the design process, in particular terms of scale, density, layout and access.<br>• Incorporate the principles of sustainable development throughout the whole design process. This will include site layout, minimising energy consumption, maximising use | The location and design of the Project is the result of a comprehensive site selection process that was led by the consideration of good design and key environmental and planning constraints to avoid and minimise impacts as early as possible. **Application Document 5.9 Design Development Report** explains where design choices have sought to reduce the environmental effects of the Project and demonstrates that the design has incorporated embedded mitigation to avoid or reduce significant environmental effects where practicable. **Application Document 7.3 Register of Environmental Actions and Commitments** details the embedded measures and additional mitigation measures that have been identified through the Environmental Impact Assessment to avoid or reduce likely significant environmental effects.<br>**Application Document 7.17 Strategic Options Report Including Needs Case** and section 3 of **Application Document 5.5 Planning Statement** explain that the Project is one of the essential network reinforcements needed to deliver the UK's net zero target and the Clean Power 2030 mission. The **Application Document 5.5 Planning Statement** and **Application Document 7.17 Strategic Options Report Including Needs Case** set out that the Project, if consented, would |

| Policy | North Lincolnshire Council Core Strategy – Policy Requirement | Project Compliance |
|---|---|---|
| | of on-site renewable forms of energy whilst mitigating against the impacts of climate change; for instance flood risk.<br>• Create safe and secure environments, which reduce the opportunities for crime and increase the sense of security for local residents through the use of Secured by Design guidance.<br>• Consider the relationship between any buildings and the spaces around them, and how they interact with each other as well as the surrounding area. The function of buildings should also be considered in terms of its appropriateness for the context in which it is located.<br>• Create attractive, accessible and easily distinguished public and private spaces that complement the built form.<br>• Support sustainable living and ensure that a mix of uses, which complement one another are incorporated.<br>• Provide flexibility in that new and existing buildings and spaces are able to respond to future social, technological, environmental and economic needs.<br>• Be easily accessible to all users via recognisable routes, interchanges and landmarks that are suitably connected to public transport links, community facilities and services and individual communities and neighbourhoods in North Lincolnshire. Buildings and spaces should be accessible by all sections of the community, and ensure that the principles of inclusive design are reflected.<br>• Incorporate appropriate landscaping and planting which enhances biodiversity or geological features whilst contributing to the creation of a network of linked greenspaces across the area. Tree planting and landscaping schemes can also assist in minimising the impacts of carbon emissions upon the environment.<br>• Integrate car parking provision within the existing public realm and other pedestrian and cycle routes. | support the UK's net zero target by reinforcing the electricity transmission network between the North of England and the Midlands and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The Project would help meet future energy requirements and support the transition to a net zero economy, and support security and reliability of supply. Without reinforcement, the capacity of the existing network is insufficient to accommodate the connection of proposed new power sources connecting in the area.<br>**Application Document 7.17 Strategic Options Report Including Needs Case** sets out why the Project is needed and what strategic options were considered to meet the identified need case, taking account of environmental, technical, cost and socio-economic considerations including specific characteristics of the site's wider context and the character of the surrounding area, amenity, existing uses, transport and access in accordance with this policy.<br>Following the selection of the strategic option, **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** and **Application Document 7.19 Supplementary Corridor and Routeing Report** explain how the routeing and siting of the Project was undertaken and the reasons for the selection of the emerging preferences which were consulted upon during two non-statutory consultations. These appraisals took into account the existing context and potential impacts relating to landscape and visual, ecology, flood risk, historic environment, settlement and population, tourism and recreation and current planning applications, alongside technical and cost consideration.<br>Following feedback from the non-statutory consultations and further design development, **Application Document 7.20 Design Development Report - 2025** set out the defined proposal developed following the non-statutory consultations, which was put forward to statutory consultation (18 February to 15 April 2025).<br>**Application Document 5.9 Design Development Report** summarises the design development and sets out how the design of the Project evolved from statutory consultation to the Project as applied for, taking into account feedback received from stakeholders.<br>**Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered** provides an overview of the main alternatives considered at each stage of the design development.<br>As set out in **Application Document 5.9 Design Development Report** the Project delivers good design by avoiding or reducing impacts on environmentally sensitive receptors as far as practicable through routeing and siting, and making efficient use of land by maximising close parallel routeing with existing electricity transmission infrastructure where reasonably practicable. Construction impacts have been reduced through the refinement of access arrangements, working areas and construction methodologies. Whole-life operational performance maintenance requirements and asset resilience have also informed design decisions. Embedded environmental mitigation has been incorporated into the design wherever reasonably practicable, as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Key measures relevant to this policy include:<br>• The Project has taken account of the existing built heritage from the earliest stages in the design process as set out in **Application Document 7.17 Strategic Options Report Including Needs Case** and **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study**, as well as **Application Document 5.9 Design Development Report**. The Project has undergone an iterative design process, following the mitigation hierarchy in seeking to protect and conserve heritage assets where practicable. **Application Document 6.10 Environmental Statement Chapter 10** Section 10.8 includes design measures of relevance to cultural heritage, This includes (but is not limited to) siting the route, where feasible to be parallel or close parallel with existing overhead lines to reduce spread of infrastructure in view, informed feedback from local |

| Policy | North Lincolnshire Council Core Strategy – Policy Requirement | Project Compliance |
|---|---|---|
| | | communities, early identification through fieldwork survey and avoidance, where possible, of areas of important archaeological remains..<br>• Sustainability has been embedded throughout the evolution of the Project and has informed decision-making from the earliest stages of the design process. The Project has been developed through an iterative and multidisciplinary approach, and throughout the design process, sustainability considerations have been balanced alongside engineering, environmental, socio-economic and cost considerations. The Project has also been developed having regard to the principles of PAS 2080:2023 – Carbon Management in Buildings and Infrastructure, which promotes the management and reduction of whole-life carbon across the lifecycle of infrastructure assets. Consistent with the PAS 2080 hierarchy, opportunities to reduce carbon have been considered through strategic option selection, routeing, engineering design and construction planning. This has included seeking to avoid unnecessary infrastructure, minimise material use where reasonably practicable, reduce construction activities and promote efficient design solutions that support long-term operational performance. Sustainability and good design will continue to inform the Project during detailed design and delivery. Further refinement of construction methods, temporary works, access arrangements and environmental mitigation will be undertaken within the parameters secured through the DCO.<br>• **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project** includes security measures the Project will incorporate such as security fencing during construction and security monitoring. **Application Document 2.12 Typical Design Drawings - Illustrative Construction Compound (Main)** illustrates the layout of construction compounds which include security measures such as a security gate house, fencing and lighting.<br>• Vegetation will be retained where practicable. Where vegetation is lost and trees cannot be replaced in situ due to the restrictions associated with operational safety, replacement vegetation will be planted as close by as practicable and will complement the landscape character and be sympathetic to the local habitat type in order to provide a high biodiversity value.<br>• Mitigation planting is proposed and the habitats to be created and/or enhanced in these areas (on-site mitigation) have been designed to provide landscape and visual mitigation while also offering ecological value. Along the proposed overhead line, 60 landscape mitigation planting areas have been identified within the Order Limits to provide landscape and visual mitigation, whilst also delivering ecological benefits. Indicative landscape proposals for each of these areas are shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.<br>• National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project will achieve a minimum of 10% BNG (through on-site and off-site BNG) and has undertaken a BNG assessment (based on Natural England's Statutory Biodiversity Metric 2024 version (as of June 2025)) which is presented in **Application Document 7.1 Biodiversity Net Gain Report**.<br>• An Outline Construction Worker Travel Plan is included within **Application Document 7.4 Outline Construction Traffic Management Plan** which sets out the principles, objectives and minimum requirements for managing construction workforce travel in a sustainable manner including minimising the number of single-occupancy car trips generated by the construction workforce; promoting sustainable modes of travel where reasonably practicable, including walking, cycling, public transport and shared transport; managing workforce travel in a way that minimises impacts on the local highway network and surrounding communities; and ensuring construction workforce travel is planned, monitored and managed in a transparent and auditable manner.<br>The use of design principles have guided the development of the Project, which reflect the acknowledgement in the NPSs that good design for electricity transmission infrastructure is achieved through infrastructure that is safe, secure and resilient, and which responds appropriately to its |

| Policy | North Lincolnshire Council Core Strategy – Policy Requirement | Project Compliance |
|---|---|---|
| | | environmental and community context, and is not defined solely by visual appearance. The principles considered include the Holford guidance, undergrounding policy, local planning policy, NIC Design Principles (National Infrastructure Commission, 2020), Planning Inspectorate's Advice on Good Design and on Linear Projects (Planning Inspectorate, 2025), technical design requirements set out in legislation and policy and other relevant legislation and policies.<br>In summary, the Project delivers good design that is sustainable, in accordance with the design policies set out in the NPSs that acknowledge that the context of any design decisions must reflect the need to efficiently deliver large-scale energy infrastructure, and therefore (as recognised in national policy), the extent to which a scheme can contribute to the enhancement of the quality of the area is limited. |
| Policy CS6: Historic Environment | The council will promote the effective management of North Lincolnshire's historic assets through:<br>• Safeguarding the nationally significant medieval landscapes of the Isle of Axholme (notably the open strip fields and turbaries) and supporting initiatives which seek to realise the potential of these areas as a tourist, educational and environmental resource.<br>• Preserving and enhancing the rich archaeological heritage of North Lincolnshire<br>• Ensuring that development within Epworth (including schemes needed to exploit the economic potential of the Wesleys or manage visitors) safeguards and, where possible, improves the setting of buildings associated with its Methodist heritage.<br>• Ensuring that development within North Lincolnshire's Market Towns safeguards their distinctive character and landscape setting, especially Barton upon Humber, Crowle and Epworth.<br>The council will seek to protect, conserve and enhance North Lincolnshire's historic environment, as well as the character and setting of areas of acknowledged importance including historic buildings, conservation areas, listed buildings (both statutory and locally listed), registered parks and gardens, scheduled ancient monuments and archaeological remains.<br>All new development must respect and enhance the local character and distinctiveness of the area in which it would be situated, particularly in areas with high heritage value.<br>Development proposals should provide archaeological assessments where appropriate. | National Grid has undertaken an iterative design process taking account of policy requirements, historic landscape character assessments and desk-based and fieldwork analysis in order to minimise and avoid, where possible, harm to the historic environment. In accordance with the mitigation hierarchy, the design of the Project has sought to avoid, reduce or mitigate potentially significant adverse effects on designated and non-designated heritage assets. Design decisions have been made to balance the need to avoid and reduce impacts on heritage assets, along with other environmental, social and operational considerations. Embedded mitigation measures are also incorporated into the design to minimise impacts as far as practicable, as secured in **Application Document 7.3 Register of Environmental Actions and Commitments.**<br>Measures relevant to the control and management of impacts to the historic environment during construction have been included within **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Further measures relevant to archaeology are set out within **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**, with archaeological works and management measures during the construction, operation and maintenance phases secured through **Application Document 7.10 Outline Cultural Heritage Management Plan**.<br>**Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** concludes that the Project would result in significant adverse effects on the setting of 1 designated heritage assets in North Lincolnshire. The Heritage Statement of Harm (Appendix A of **Application Document 5.5 Planning Statement**) concludes that the majority of these would result in less than substantial harm, concluding that in total the Project would result in less than substantial harm to 9 designated heritage assets in North Lincolnshire.<br>Measures relevant to the control and management of impacts on the historic environment during construction have been included within **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**. Further measures relevant to archaeology are set out within **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**, with archaeological works and management measures during the construction, operation and maintenance phases secured through **Application Document 7.10 Outline Cultural Heritage Management Plan**.<br>The Project results in significant adverse effects on some designated heritage assets, however as set out in the Heritage Statement of Harm (Appendix A of **Application Document 5.5 Planning Statement**), this would amount to less than substantial harm for those assets in North Lincolnshire. In accordance with NPS EN-1 paragraphs 5.9.29 and 5.9.33, the NPPF and NPPG, the substantial public benefits and need for the Project, as set out in sections 3 and 8 of **Application Document 5.5 Planning Statement**, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives is considered to clearly and demonstrably outweigh the less than substantial harm at the lower end and middle of the spectrum to the designated and non-designated heritage assets affected. |

| Policy | North Lincolnshire Council Core Strategy – Policy Requirement | Project Compliance |
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| Policy CS16: North Lincolnshire's Landscape, Greenspace and Waterscape | The council will protect, enhance and support a diverse and multi-functional network of landscape, greenspace and waterscape through:<br>1. Identifying in supporting documents within or evidencing the Local Development Framework, a network of strategically and locally important landscape, greenspace and waterscape areas. Development on or adjacent to these areas will not be permitted where it would result in unacceptable conflict with the function(s) or characteristic of that area.<br>2. Requiring development proposals to improve the quality and quantity of accessible landscape, greenspace and waterscape, where appropriate.<br>3. Requiring development proposals to address local deficiencies in accessible landscape, waterscape and greenspace where appropriate.<br>4. Requiring the protection of trees, hedgerows and historic landscape to be specified where appropriate.<br>The creation and maintenance of the network of landscape, green space and waterscapes will be secured by a range of measures, including protecting open space, creating new open spaces as part of new development, and by using developer contributions to create, improve and maintain green infrastructure assets where appropriate. | The location and design of the Project is the result of a comprehensive site selection process that was led by the consideration of good design and key environmental and planning constraints to avoid and minimise impacts as early as possible. **Application Document 5.9 Design Development Report** explains where design choices have sought to reduce the environmental effects of the Project and demonstrates that the design has incorporated embedded mitigation to avoid or reduce significant environmental effects where practicable. **Application Document 7.3 Register of Environmental Actions and Commitments** details the embedded measures and additional mitigation measures that have been identified through the Environmental Impact Assessment to avoid or reduce likely significant environmental effects. The following measures are proposed in relation to landscape, greenspace and waterscape.<br>The Project's aim is to retain existing vegetation wherever practicable in accordance with **Application Document 7.3 Register of Environmental Actions and Commitments**. Where reasonably practicable, construction elements (such as working areas, accesses, laydown and temporary construction compounds) will be kept to the minimum required and micro-sited to avoid impacts on ecologically important features. Overseen and informed by the ECoW and ArbCoW, sensitive habitats will be demarcated to ensure contractors protect as much vegetation as possible.<br>As a general principle, all land which is temporarily impacted by the Project will be reinstated where practicable to its pre-construction condition land use. In addition to the reinstated habitats across the route, there will also be 'mitigation planting areas' located in key locations through the Project. The locations of these areas are detailed within **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design** and Table 8.2 of **Application Document 7.8 Outline Landscape and Ecology Management Plan** sets out a list of the mitigation planting areas proposed within the Order Limits.<br>The habitats to be created and/or enhanced in these areas (on-site mitigation) have been designed to provide landscape and visual mitigation while also offering ecological value. Along the proposed overhead line, 60 landscape mitigation planting areas have been identified within the Order Limits to provide landscape and visual mitigation, whilst also delivering ecological benefits. Indicative landscape proposals for each of these areas are shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.<br>The Project will use existing watercourse crossing points as far as practicable to minimise the introduction of new crossings and associated impacts. Following the completion of works, all temporarily impacted watercourses will be reinstated to their former state, or better. All temporary structures such as culverts, bridges and dams will be removed, and all impacted watercourse features including bank profile, bed levels, and gradients will be reinstated (where not considered an upgrade to an existing culvert). This will include the replacement of any substrate or vegetation that was temporarily removed. |
| Policy CS17: Biodiversity | The council will promote effective stewardship of North Lincolnshire's wildlife through:<br>1. Safeguarding national and international protected sites for nature conservation from inappropriate development.<br>2. Appropriate consideration being given to European and nationally important habitats and species.<br>3. Maintaining and promoting a North Lincolnshire network of local wildlife sites and corridors, links and stepping stones between areas of natural green space.<br>4. Ensuring development retains, protects and enhances features of biological and geological interest and provides for the appropriate management of these features.<br>5. Ensuring development seeks to produce a net gain in biodiversity by designing in wildlife, and ensuring any unavoidable impacts are appropriately mitigated for. | Embedded, control and management, and additional mitigation measures identified to avoid and reduce effects on ecology and biodiversity as far as practicable are set out in **Application Document 7.3 Register of Environmental Actions and Commitments, Application Document 7.2 Outline Code of Construction Practice**, **Application Document 7.8 Outline Landscape and Ecology Management Plan Application Document 7.7 Outline Noise and Vibration Management Plan, Application Document 7.5 Outline Soil Management Plan**, and these documents will be secured by **Application Document 3.1 Draft Development Consent Order**.<br>These measures include sensitive routeing and siting in the first instance to avoid or reduce impacts as far as practicable, as well as buffers to sensitive features followed by a suite of mitigation planting and other habitat measures across the Order limits where relevant.<br>Following the implementation of embedded, control and additional mitigation measures, **Application Document 6.8 Environmental Statement Chapter 8 Ecology and Application Document 6.9 Environmental Statement Chapter 9 Ornithology conclude** that the Project, based on the current |

| Policy | North Lincolnshire Council Core Strategy – Policy Requirement | Project Compliance |
|---|---|---|
| | 6. Supporting wildlife enhancements that contribute to the habitat restoration targets set out in the North Lincolnshire's Nature Map and in national, regional and local biodiversity action plans.<br>7. Improving access to and education/interpretation of biodiversity sites for tourism and the local population, providing their ecological integrity is not harmed. | design as set out in **Application Document 6.4 Chapter 4 Description of the Project**, the Project avoids significant adverse impacts on all international and national and local statutory designated sites for nature conservation including SSSI's, non-statutory designated sites, irreplaceable habitat, priority habitats, important hedgerows and other terrestrial habitats, protected species and other species, including all bird species within North Lincolnshire. This has been achieved by following the mitigation hierarchy with the design process, and in accordance with the Holford guidance, to avoid impacts where possible. This is demonstrated in **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered, Application Document 7.17 Strategic Options Report Including Needs Case and Application Document 5.9 Design Development Report.**<br>In summary, National Grid considers that it has applied the mitigation hierarchy appropriately in designing the Project to avoid as far as possible, adverse effects on irreplaceable habitats. The location, routeing and siting of the Project has been designed to avoid impacts on designated ancient woodland and veteran trees as far as practicable. The Project would not result in the loss or deterioration of any designated (on the AWI) ancient woodland or trees, or veteran trees in North Lincolnshire.<br>Areas of woodland not designated on the Ancient Woodland Inventory were also considered in the design and balanced against heritage and ecological impacts relevant to each area and the need to avoid the dispersion of broader landscape impacts across previously undisturbed areas.<br>Therefore, it is considered that the Project is in accordance with Paragraphs 5.4.15 to 5.4.16, 5.4.33 and 5.4.55 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) regarding irreplaceable habitats.<br>In addition, National Grid has committed to deliver at least 10% BNG through on-site and off-site measures with wider environmental and societal benefits as set out in **Application Document 7.1 Biodiversity Net Gain Report**. |
| Policy CS18: Sustainable Resource Use and Climate Change | The council will actively promote development that utilises natural resources as efficiently and sustainably as possible. This will include:<br>1. Meeting high water efficiency standards, and incorporating new technologies to recycle and conserve water resources.<br>2. Requiring the use of Sustainable Urban Drainage Systems (SuDS) where practicable.<br>3. Supporting the necessary improvement of flood defences and surface water infrastructure required against the actions of climate change, and preventing development in high flood risk areas wherever practicable and possible.<br>4. Meeting required national reductions of predicted $CO_2$ emissions by at least 34% in 2020 and 80% in 2050 by applying the following measures on development proposals. Requiring all industrial and commercial premises greater than 1000 square metres to provide 20% of their expected energy demand from on site renewable energy until the code for such buildings is applied nationally. Where developers consider these Codes and targets cannot be met on the basis of viability they will be required to provide proof through open book discussions with the council at the planning application stage.<br>5. Ensuring building design reduces energy consumption by appropriate methods such as high standards of insulation, avoiding development in areas subject to significant effects from shadow, wind and frost, using natural lighting and ventilation, capturing the sun's heat, where appropriate.<br>6. Supporting development that minimises the consumption and extraction of minerals by making the greatest possible reuse or recycling of materials in new construction, and by making best use of existing buildings and infrastructure.<br>7. Supporting development that seeks to minimise waste and facilitates recycling and using waste for energy where appropriate. | The below sections address the relevant parts of this policy to the Project:<br>*Surface water*<br>**Application Document 7.3 Register of Environmental Actions and Commitments**, which is secured by **Application Document 3.1 Draft Development Consent Order** sets out that temporary infrastructure such as construction compounds, lay down areas (as well as areas where impermeable material will be installed or where heavy equipment would be used) and construction access tracks would be drained using sustainable drainage systems (SuDS) techniques that are suitable for local ground conditions and topography and which are designed to accommodate a 1 in 10-year (10% Annual Exceedance Probability) event, plus a 40% allowance for climate change resilience. These areas will be reinstated after completion of the temporary works, as agreed with the landowner. The design and proposals for SuDS will be confirmed during the detailed design phase of the Project.<br>*Flood risk*<br>**Application Document 7.13 Flood Risk Assessment** that from the outset of the Project, a sequential approach has been taken to siting infrastructure for the Project, particularly those elements that are vulnerable to inundation, as evidenced in **Application Document 7.17 Strategic Options Report Including Needs Case**.<br>During construction, the FRA concludes that following the application of a sequential approach and a lack of proximate feasible alternatives as detailed in **Application Document 7.17 Strategic Options Report Including Needs Case**, three construction compounds are located in Flood Zone 3, in addition to some temporary haul roads and construction access which must necessarily be located in Flood Zones 2 and 3. The FRA concludes, however, that these risks would be reduced and managed by implementing a range of mitigation measures set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, including those detailed in a Flood Warning and Evacuation Plan, and by programming construction activities in floodplains to avoid periods of likely |

| Policy | North Lincolnshire Council Core Strategy – Policy Requirement | Project Compliance |
|---|---|---|
| | 8. Ensuring that development and land use in areas close to the Humber Estuary and rivers responds appropriately to the character of the area, in the interests of preserving and making best use of limited resources.<br>9. Supporting development that will help to reduce the need to travel for people using that development.<br>10. Ensuring development and land use helps to protect people and the environment from unsafe, unhealthy and polluted environments, by protecting and improving the quality of the air, land and water.<br>11. Supporting renewable sources of energy in appropriate locations, where possible, and ensuring that development maximises the use of combined heat and power, particularly at the South Humber Bank employment site and where energy demands for more than 2MW are required for development.<br>12. Supporting new technology and development for carbon capture and the best available clean and efficient energy technology, particularly in relation to the heavy industrial users in North Lincolnshire, to help reduce $CO_2$ emissions.<br>13. Promote the use of a greenspace strategy and a green infrastructure plan, where applicable, which could help reduce the effects of climate change. | high river levels where practicable. Following the implementation of these measures, the residual risk is medium for fluvial and tidal flooding, and low for surface water and groundwater. Overall the construction of the Project results in no significant effects in relation to flood risk, as set out in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**.<br>During operation, due to its linear nature and the geographical extent of the Project, while the siting of pylons within the defended floodplain has largely been avoided, some operational Project components, namely pylons, must necessarily be located in Flood Zones 2 and 3 with some areas being within the floodplain.<br>The Exception Test set out in Policy F6 of the NPPF is therefore triggered, and the FRA provides the evidence of how the Project satisfies this test. The FRA concludes that, with regard to the test, the Project is a NSIP that would play an important role in delivering renewable electricity efficiently, reliably and safely and would support the UK's move towards net zero, therefore it would provide wider sustainability benefits to the community that outweigh flood risk.<br>In addition, permanent Project infrastructure which lies within areas at risk of fluvial or tidal flooding only comprises a small number of pylons. These pylons are resilient to flooding, given their concrete bases and metal lattice structures which would not be impacted by floodwaters, and so ensure the Project would be safe and could continue to operate in times of flood. A suite of measures would be adopted, as described in Table 3.1 of **Application Document 7.13 Flood Risk Assessment** and also set out in **Application Document 7.3 Register of Environmental Actions and Commitments** which is secured by **Application Document 3.1 Draft Development Consent Order**, to prevent flood risk increases during operation of the Project.<br>Following consultation with the Environment Agency in accordance with paragraph 5.8.18 to 5.8.20 of NPS EN-1, it was stipulated that compensatory storage for pylons within the floodplain would be required. Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 Flood Risk Assessment** sets out the proposed location of floodplain storage compensation areas that are proposed on land outside of the floodplain. The flood storage compensation proposals outlined in Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 Flood Risk Assessment** provide evidence that the Project, on the implementation of flood compensation areas within the same floodplain cell, will not increase the overall water level and therefore does not increase flood risk elsewhere. Furthermore, a conservative approach to calculating floodplain storages losses was taken, meaning the suggested volume for compensation areas likely exceeds the requirement. As such, there is the opportunity for the Project to reduce flood risk overall via these floodplain storage compensation areas.<br>It is therefore concluded that during the operational phase, the Project is considered to be at low risk of flooding from all sources assessed due to the mitigation measures built into its design. The Project is not anticipated to increase flood risk elsewhere during its operation as any losses of floodplain storage would be compensated for. New impermeable surfaces would be very localised to pylon bases and rainfall runoff from these areas would be attenuated by surrounding reinstated vegetation and would soak back into the ground.<br>The Exception Test is therefore concluded to be satisfied, as the Project would bring significant benefits via its delivery of safe, reliable, and renewable electricity; would not result in an increase in flood risk elsewhere; and has been designed to be resilient to flooding throughout its lifetime.<br>*GHG emissions*<br>Although the construction and operation of the Project will directly result in increased GHG emissions, to provide context, consideration also needs to be given to its role in wider UK policy to decarbonise the electricity grid. Over its lifetime, the Project will provide a key contribution to the UK fulfilling its net zero policy and transition away from fossil fuels. By reinforcing the electricity transmission network, the Project will facilitate the connection of new renewable and low-carbon energy generation and transmission. |

| Policy | North Lincolnshire Council Core Strategy – Policy Requirement | Project Compliance |
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| | | *Waste*<br>**Application Document 6.4 Environmental Statement Chapter 4 Description of the Project** sets out the approach taken on the Project to materials and waste. The nature of the Project means that it is difficult to use secondary (reused/recycled) sources during its construction, as this can affect the operation and the design life of the Project. However, National Grid has existing processes in place to obtain materials from sustainable sources and to use recycled materials where these do not compromise the required design standards and operational life of the Project.<br>Temporary materials, such as aggregate for access routes and site compounds, works cabins, and security fencing, would be required during construction. Where practicable, temporary materials would be sourced from other construction projects within the region and reused at other construction projects after completion of the Project.<br>**Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.2 Outline Code of Construction Practice** set out that a SWMP will be developed prior to construction. The SWMP will include but not be limited to:<br>• Waste forecasts;<br>• How waste will be reduced, re-used, managed and disposed of in accordance with the waste hierarchy;<br>• Identification of recovery routes; and<br>• Actual waste figures once work has begun.<br>Consideration will be given to the guidance in The Definition of Waste: Development Industry Code of Practice (DoWCoP). Dedicated waste management areas will be designed to sufficiently accommodate the types and volumes of waste produced and to reduce the environmental risk of storing waste on-site (covered, secured and away from drainage).<br>*Pollution*<br>As set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, all use and storage of chemicals and fuels is to be undertaken in accordance with Environment Agency guidance and The Control of Pollution (Oil Storage) (England) Regulations 2001 (HM Government, 2001). The use and storage of chemicals and fuels will also be controlled and monitored under the detailed Code of Construction Practice which will include, for example, procedures for good general construction site practices, environmental and waste management procedures, regular vehicle checks, use of spill kits, correct waste storage and disposal, use of oil-water separators as necessary (for example, for drainage from refuelling areas), collection of process water from the washout/cleaning of ready-mix concrete vehicles and equipment for treatment/disposal.<br>**Application Document 6.15 Environmental Statement Chapter 15 Air Quality** presents the assessment of the likely significant air quality effects that could result from the Project. During the construction phase, construction machinery and vehicles could generate dust particularly through earthworks activities. Machinery and construction vehicles would also emit exhaust emissions that may lead to impacts on air quality. There is limited potential for the Project to generate dust and emissions during the operational phase, due to the limited activities associated with inspection and maintenance, therefore, this has been scoped out of the assessment. A construction dust risk assessment has been undertaken and is set out in **Application Document 6.15.A2 Environmental Statement Appendix 15.2 Construction Dust Methodology and Assessment**.<br>*Renewable energy*<br>The Project comprises a new 400 kilovolt (kV) transmission connection approximately 90 kilometre (km) in length between a new substation to be built in the vicinity of Birkhill Wood, located to the north of Hull near Creyke Beck in the East Riding of Yorkshire, and a new substation at High Marnham in Nottinghamshire. **Application Document 5.5 Planning Statement** and **Application** |

| Policy | North Lincolnshire Council Core Strategy – Policy Requirement | Project Compliance |
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| | | **Document 7.17 Strategic Options Report Including Needs Case** sets out that the Project, if consented, would support the UK's net zero target by reinforcing the electricity transmission network between the North of England and the Midlands and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The Project would help meet future energy requirements and support the transition to a net zero economy. |
| Policy CS19: Flood Risk | The council will support development proposals that avoid areas of current or future flood risk, and which do not increase the risk of flooding elsewhere. This will involve a risk based sequential approach to determine the suitability of land for development that uses the principle of locating development, where possible, on land that has a lower flood risk, and relates land use to its vulnerability to flood. Development in areas of high flood risk will only be permitted where it meets the following prerequisites:<br>1. It can be demonstrated that the development provides wider sustainability benefits to the community and the area that outweigh flood risk.<br>2. The development should be on previously used land. If not, there must be no reasonable alternative developable sites on previously developed land.<br>3. A flood risk assessment has demonstrated that the development will be safe, without increasing flood risk elsewhere by integrating water management methods into development.<br>Development within the Lincolnshire Lakes area will comply with the flood management principals set out in the Western Scunthorpe Urban Extension Exception Test Strategy. Any further flood management proposals will have to be agreed by both the council and the Environment Agency during the process of the Lincolnshire Lakes Area Action Plan. Development proposals in flood risk areas which come forward in the remainder of North Lincolnshire shall be guided by the Strategic Flood Risk Assessment for North Lincolnshire and North East Lincolnshire. This will ensure that proposals include site specific flood risk assessments which take into account strategic flood management objectives and properly apply the Sequential and, where necessary, Exception Tests.<br>In addition development will be required, wherever practicable, to incorporate Sustainable Urban Drainage Systems (SUDS) to manage surface water drainage. The Council will also seek to reduce the increase in flood risk due to climate change through measures to reduce carbon dioxide emissions. | **Application Document 7.13 Flood Risk Assessment** has been prepared which assesses whether the Project is likely to be at risk of flooding or is likely to increase flood risk elsewhere. The FRA concludes that from the outset of the Project, a sequential approach has been taken to siting infrastructure for the Project, particularly those elements that are vulnerable to inundation, as evidenced in **Application Document 7.17 Strategic Options Report Including Needs Case**.<br>The water environment and flood risk were considered in the early stages of siting and design and embedded measures have been intrinsic to the design of the Project to reduce and where possible avoid flood risks and impacts on the water environment. Embedded mitigation measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments,** which is secured by **Application Document 3.1 Draft Development Consent Order** and include:<br>• Where possible the design of the temporary haul roads has sought to utilise existing bridges and culverts in order to avoid physical disturbance, impacts on flow regimes.<br>• Large or sensitive watercourses, for example those designated as main river, and those with WFD status, will be crossed by the temporary haul road using temporary clear span bridges to avoid in-channel works and associated effects.<br>• Application of appropriate stand-off distances of 10 m have been applied to watercourses to avoid directs effects where practicable.<br>Temporary infrastructure such as construction compounds, lay down areas (as well as areas where impermeable material will be installed or where heavy equipment would be used) and construction access tracks would be drained using sustainable drainage systems (SuDS) techniques that are suitable for local ground conditions and topography and which are designed to accommodate a 1 in 10-year (10% Annual Exceedance Probability) event, plus a 40% allowance for climate change resilience. These areas will be reinstated after completion of the temporary works, as agreed with the landowner. In addition, measures to control and manage construction impacts are set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments** including those detailed in a Flood Warning and Evacuation Plan, and by programming construction activities in floodplains to avoid periods of likely high river levels where practicable.<br>During construction, the FRA concludes that following the application of a sequential approach and a lack of proximate feasible alternatives as detailed in **Application Document 7.17 Strategic Options Report Including Needs Case**, three construction compounds are located in Flood Zone 3, in addition to some temporary haul roads and construction access which must necessarily be located in Flood Zones 2 and 3. The FRA concludes, however, that these risks would be reduced and managed by implementing a range of mitigation measures set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, including those detailed in a Flood Warning and Evacuation Plan, and by programming construction activities in floodplains to avoid periods of likely high river levels where practicable. Following the implementation of these measures, the residual risk is medium for fluvial and tidal flooding, and low for surface water and groundwater. Overall the construction of the Project results in no significant effects in relation to flood risk, as set out in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**.<br>During operation, due to its linear nature and the geographical extent of the Project, while the siting of pylons within the defended floodplain has largely been avoided, some operational Project |

| Policy | North Lincolnshire Council Core Strategy – Policy Requirement | Project Compliance |
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| | | components, namely pylons, must necessarily be located in Flood Zones 2 and 3 with some areas being within the floodplain.<br>The Exception Test set out in Policy F6 of the NPPF is therefore triggered, and the FRA provides the evidence of how the Project satisfies this test. The FRA concludes that, with regard to the test, the Project is a NSIP that would play an important role in delivering renewable electricity efficiently, reliably and safely and would support the UK's move towards net zero, therefore it would provide wider sustainability benefits to the community that outweigh flood risk.<br>In addition, permanent Project infrastructure which lies within areas at risk of fluvial or tidal flooding only comprises a small number of pylons. These pylons are resilient to flooding, given their concrete bases and metal lattice structures which would not be impacted by floodwaters, and so ensure the Project would be safe and could continue to operate in times of flood. A suite of measures would be adopted, as described in Table 3.1 of **Application Document 7.13 Flood Risk Assessment** and also set out in **Application Document 7.3 Register of Environmental Actions and Commitments** which is secured by **Application Document 3.1 Draft Development Consent Order**, to prevent flood risk increases during operation of the Project.<br>Following consultation with the Environment Agency in accordance with paragraphs 5.8.18 to 5.8.20 of NPS EN-1, it was stipulated that compensatory storage for pylons within the floodplain would be required. Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 Flood Risk Assessment** sets out the proposed location of floodplain storage compensation areas that are proposed on land outside of the floodplain. The flood storage compensation proposals outlined in Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 Flood Risk Assessment** provide evidence that the Project, on the implementation of flood compensation areas within the same floodplain cell, will not increase the overall water level and therefore does not increase flood risk elsewhere. Furthermore, a conservative approach to calculating floodplain storages losses was taken, meaning the suggested volume for compensation areas likely exceeds the requirement. As such, there is the opportunity for the Project to reduce flood risk overall via these floodplain storage compensation areas.<br>It is therefore concluded that during the operational phase, the Project is considered to be at low risk of flooding from all sources assessed due to the mitigation measures built into its design. The Project is not anticipated to increase flood risk elsewhere during its operation as any losses of floodplain storage would be compensated for. New impermeable surfaces would be very localised to pylon bases and rainfall runoff from these areas would be attenuated by surrounding reinstated vegetation and would soak back into the ground.<br>The Exception Test is therefore concluded to be satisfied, as the Project would bring significant benefits via its delivery of safe, reliable, and renewable electricity; would not result in an increase in flood risk elsewhere; and has been designed to be resilient to flooding throughout its lifetime. |
| Policy CS20: Sustainable Waste Management | The Council will consider new and enhanced facilities for the treatment and management of waste in the following broad strategic areas:<br>• Scunthorpe<br>• South Humber Bank Employment Area<br>• Flixborough Industrial Estate<br>• Power station sites and other high energy usage installations<br>• Farms which will directly use organic agricultural products derived from waste treatment<br>In general a sequential search will be made for the location of waste management facilities from the highest to lowest preference as follows:<br>1. On-site management of waste where it arises at retail, industrial and commercial locations, particularly in the main urban areas (The Proximity Principle) | **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project** sets out the approach to materials and waste. The nature of the Project means that it is difficult to use secondary (reused/recycled) sources during its construction, as this can affect the operation and the design life of the Project. However, National Grid has existing processes in place to obtain materials from sustainable sources and to use recycled materials where these do not compromise the required design standards and operational life of the Project.<br>Temporary materials, such as aggregate for access routes and site compounds, works cabins, and security fencing, would be required during construction. Where practicable, temporary materials would be sourced from other construction projects within the region and reused at other construction projects after completion of the Project.<br>**Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.2 Outline Code of Construction Practice** set out that a SWMP will be developed prior to construction. The SWMP will include but not be limited to: |

| Policy | North Lincolnshire Council Core Strategy – Policy Requirement | Project Compliance |
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| | 2. Pursuit of neighbourhood self-sufficiency, at the lowest practicable level for the waste stream concerned (The Self-Sufficiency Principle)<br>3. Encouraging co-location of waste facilities - at Materials or Resource Recovery Parks for example<br>4. Locations at existing mineral extraction and waste landfill sites<br>5. Locations at established and proposed industrial and business sites<br>6. Locations in redundant farm buildings and associated land<br>7. Use of other previously-developed land.<br>The Council will promote sustainable waste management by:<br>• Requiring Site Waste Management Plans for future major developments to minimise waste<br>• Requiring the integration of facilities for waste minimisation, re-use, recycling and composting, in association with the planning, construction and occupation of new development.<br>• Providing guidance on minimising potential social, environmental and economic impacts that are likely to arise in the development of waste infrastructure<br>• Establishing a planning policy framework that identifies suitable locations for waste management. | • Waste forecasts;<br>• How waste will be reduced, re-used, managed and disposed of in accordance with the waste hierarchy;<br>• Identification of recovery routes; and<br>• Actual waste figures once work has begun.<br>Consideration will be given to the guidance in The Definition of Waste: Development Industry Code of Practice (DoWCoP). Dedicated waste management areas will be designed to sufficiently accommodate the types and volumes of waste produced and to reduce the environmental risk of storing waste on-site (covered, secured and away from drainage). |
| Policy CS21: Minerals | The Council will safeguard mineral resources in North Lincolnshire from other development that would prejudice future mineral extraction. To achieve this Mineral Safeguarding Areas will be identified in the Minerals and Waste DPD.<br>Based on the geologically mapped resources that are considered to be of current and future economic importance; specifically including all unsterilised deposits of aggregates (sand, gravel, limestone and sandstone), ironstone, silica sand, clay, brickearth, and chalk. Major developments in the Mineral Safeguarding Areas will only be permitted where is has been demonstrated that:<br>a) the mineral is no longer of any value, or<br>b) the mineral can be extracted prior to the development taking place, or<br>c) the development will not inhibit extraction if required in the future, or<br>d) there is an overriding need for the development and prior extraction cannot be reasonably undertaken, or<br>e) the development is allocated in a local development plan document, or<br>f) the development is not incompatible<br>Mineral Safeguarding Areas along with Specific Sites, Preferred Areas, and Areas of Search will be identified as appropriate in the Minerals and Waste DPD, through formal consultation with operators, land owners and others.<br>The council will provide for a steady and adequate supply of minerals to be maintained in accordance with national and regional guidance.<br>Therefore, the council will maintain landbanks of at least:<br>a) 10 years at each individual site for silica sand or in the case of significant new capital investment 15 years or substantially longer for Greenfield sites.<br>b) 7 years for sand gravel<br>c) 10 years for crushed rock<br>The sustainable extraction of minerals will be managed by:<br>a) Reducing the consumption of non-renewable mineral resources by encouraging reuse and recycling of construction and demolition waste, particularly from land reclamation | National Grid acknowledges that parts of the study area for the Project assessments are located within North Lincolnshire mineral consultation zone and clay protection area.<br>Whist it is acknowledged that some temporary sterilisation of some small areas of minerals resources may occur associated with the Project, these resources could become available in the future. **Application Document 6.12.A3 Environmental Statement Appendix 12.3 Preliminary Qualitative Minerals Resource Assessment** concludes it would not be practical to extract the mineral prior to development.<br>The Project is considered to be of national significance, and therefore the need for the Project outweighs the need to safeguard the mineral deposit. Based on the national significance of the Project and that all affected authorities have more than the seven-year land bank of sand and gravel, as required by the NPPF, and sufficient additional safeguarded areas, it is considered that the potential impact of sterilising the small volume associated with the Project is acceptable without further consideration or mitigation. |

| Policy | North Lincolnshire Council Core Strategy – Policy Requirement | Project Compliance |
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| | schemes, and the by-products of industrial processes, especially power generation and steel manufacture.<br>b) Requiring phased development and progressive restoration of mineral sites<br>c) The use of restoration materials to progressively restore mineral sites.<br>d) Safeguarding natural watercourses.<br>e) Planning applications for mineral extraction to be accompanied by an Environmental Statement where required by guidelines.<br>f) Where aappropriate, site restoration will contribute to the attainment of local biodiversity targets. | |

## 2.7 North Lincolnshire Local Plan (2003)

Table 2.7 – Signposting for Compliance with the North Lincolnshire Local Plan (2003)

| Policy | North Lincolnshire Local Plan – Policy Requirement | Project Compliance |
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| Policy ST3: Development Limits | Development outside development boundaries will be considered as development in the open countryside and will only be permitted if it is essential for the purposes of agriculture, forestry or to meet a special need associated with the countryside. | The Project is a utility infrastructure development and is to be sited outside of the defined settlement boundaries.<br>**Application Document 5.5 Planning Statement** and **Application Document 7.17 Strategic Options Report Including Needs Case** set out that the Project, if consented, would support the UK's net zero target by reinforcing the electricity transmission network between the North of England and the Midlands and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The Project would help meet future energy requirements and support the transition to a net zero economy.<br>It is concluded that the Project is of an appropriate scale to its location, due to it being one of the essential network reinforcements in the North of England and the Midlands needed to deliver the UK's net zero target and the Clean Power 2030 mission, and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The reinforcement will also support security and reliability of supply. Without reinforcement, the capacity of the existing network is insufficient to accommodate the connection of proposed new power sources connecting in the area.<br>The Project has considered the policies in this Local Plan in the development of the design and in the assessment of potential impacts of the Project, and accordance with these policies is set out in **Application Document 5.5 Planning Statement** and in this table. The Environmental Statement (**Application Documents 6.1 to 6.22**), **Application Document 5.5 Planning Statement** and this table summarise the economic, social and environmental impacts of the Project, and it is concluded overall that the Project is in accordance with national policy including NPS EN-1 and NPS EN-5 which governs NSIPs such as the Project, because the Project will not result in adverse impacts that outweigh its benefits. In addition, the Project complies with the polices in this Local Plan and ensures that the Project will support the future sustainable growth of settlements in accordance with this policy. |
| Policy RD2: Development in the Open Countryside | Development in the open countryside will be strictly controlled. Planning permission will only be granted for development which is:<br>i) essential to the efficient operation of agriculture or forestry;<br>ii) employment related development appropriate to the open countryside;<br>iii) affordable housing to meet a proven local need;<br>iv) essential for the provision of outdoor sport, countryside recreation, or local community facilities;<br>v) for the re-use and adaptation of existing rural buildings;<br>vi) for diversification of an established agricultural business;<br>vii) for the replacement, alteration or extension of an existing dwelling;<br>viii) essential for the provision of an appropriate level of roadside services or the provision of utility services.<br>Provided that:<br>a) the open countryside is the only appropriate location and development cannot reasonably be accommodated within defined development boundaries;<br>b) the proposed development accords with the specific requirements set out in the relevant policies of this chapter and elsewhere in this Local Plan;<br>c) the development would not be detrimental to the character or appearance of the open countryside or a nearby settlement in terms of siting, scale, massing, design and use of materials; and<br>d) the development would not be detrimental to residential amenity or highway safety; and<br>e) account is taken of whether the site is capable of being served by public transport; and<br>f) the development is sited to make the best use of existing and new landscaping. | |

| Policy | North Lincolnshire Local Plan – Policy Requirement | Project Compliance |
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| Policy T1: Location of Development | Development proposals, which generate a significant volume of traffic movement, will be permitted provided that they are located:<br>i) in the urban area of Scunthorpe and Bottesford, Barton upon Humber, Brigg, and the areas identified for development at the South Humber Bank and Humberside International Airport; and<br>ii) where there is good access to rail, water and air transport, or to the North Lincolnshire Strategic Road Network; and<br>iii) where there is good foot, cycle and public transport provision or where there are opportunities for foot, cycle and public transport to be provided. | **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** provides an assessment of the potential impacts of the Project on traffic and transport. It concludes that following the implementation of embedded, control and management measures set out in **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.4 Outline Construction Traffic Management Plan** there would be no residual significant adverse effects on any PARs. There would be no residual significant adverse effects with respect to non-motorised user delay, non-motorised user amenity, fear and intimidation, driver delay or highway safety. The Project would result in the temporary road closure of Tongue Lane (PAR 28), however the effects of the temporary redistribution of traffic onto other PARs is concluded to be not significant. |
| Policy T2: Access to Development | All development must be provided with a satisfactory access. In larger developments it should be served adequately by:<br>i) being readily accessible by a choice of transport modes; and<br>ii) existing public transport services and infrastructure; or<br>iii) additions or extensions to such services linked directly to the development; and<br>iv) the existing highway network. | An assessment of the transport impacts of the Project is detailed in **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport. Application Document 7.15 Transport Assessment also supports the Application**,<br>Transport and traffic considerations have been integral to the design of the Project, and embedded and control and management measures have been incorporated into the design from the outset to avoid or reduce effects as far as practicable. Embedded measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments** and include:<br>• The Project design includes strategically located and optimised construction access tracks (construction access tracks) along the Project alignment to support construction of the Project and reduce the effects of construction traffic movements on the local public highway network during construction.<br>• The selection of PARs has been in part informed by a need to avoid impacting areas of population wherever possible and to maximise the use of construction access tracks. PARs are shown on **Application Document 6.14.F1 Environmental Statement Figure 14.1 Primary Access Routes**.<br>Control and management measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments and Application Document 7.4 Outline Construction Traffic Management Plan** and include but are not limited to temporary traffic regulation orders, temporary traffic management and highway works, construction working hours outside of peak times, and measures to reduce route and journey mileage to and from, and around, the site, and to prevent potential nuisance to residents, businesses and the wider community associated with parking, vehicle movements and access restrictions.<br>PRoWs will be managed in accordance with the PRoW Management Plan which will be developed in accordance with **Application Document 7.6 Outline Public Rights of Way Management Plan**. |
| Policy R5: Recreational Paths Network | The creation of a strategic network of recreational paths to provide linkages from the built up areas of North Lincolnshire to open spaces, woodland, riverside and water areas and the wider countryside will actively be pursued. Additional footpath links are to be created over the Local Plan period.<br>In determining planning applications where development may either have implications for the maintenance of the recreational paths network, or offer opportunities to expand this network the following factors will be taken into account:<br>i) favourable consideration will be given to development proposals which provide additional links to the recreational network;<br>ii) the Council will seek to negotiate additional linkages to the recreational paths network, where appropriate;<br>iii) favourable consideration will be given to development proposals which will improve the condition and appearance of existing links in the network; | **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** and **Application Document 14 Environmental Statement Chapter 14 Traffic and Transport** anticipate that, following the implementation of embedded and control measures, there would be no permanent PRoW closures or diversions as a result of the Project. The Project's construction period would result in temporary closures and diversions, however the majority of these would have a negligible impact, be in place for a short period, or offer similar character and amenity, and therefore will have comparable recreational value and no significant adverse impacts are reported as a result of these diversions. Details of PRoW diversions during construction are set out in with **Application Document 7.6 Outline Public Rights of Way Management Plan.** |

| Policy | North Lincolnshire Local Plan – Policy Requirement | Project Compliance |
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| | iv) existing rights of way will be protected from development that would remove or restrict the right of way;<br>v) permission will not be granted for any development which would prejudice public access onto and through the recreational path network, unless specific arrangements are made for suitable alternative linkages;<br>vi) where necessary, the diversion of footpaths will be required. | |
| Policy LC1: Special Protection Areas, Special Areas of Conservation and Ramsar Sites | Proposals for development which may affect an SPA, a proposed SPA, a SAC or candidate SAC will be assessed according to their implications for the site's conservation objectives. Proposals not directly connected with, or necessary for, the site, and which are likely to have an significant effect on the site (either individually or in combination with other proposals), will not be permitted unless it can be conclusively demonstrated that:<br>i) there is no alternative solution; and<br>ii) there are imperative reasons of overriding public interest for the development.<br>Where the site hosts a priority natural habitat type or a priority species, proposals will not be permitted unless it can be conclusively demonstrated that it is necessary for reasons of human health or public safety, or for consequences of primary importance for nature conservation.<br>Where such a development does proceed, the use of conditions or planning obligations to secure all compensatory measures necessary to comply with Article 3 of the EEC Habitats and Species Directive will be considered. | Following the implementation of embedded, control and additional mitigation measures, **Application Document 6.8 Environmental Statement Chapter 8 Ecology and Application Document 6.9 Environmental Statement Chapter 9 Ornithology** conclude that the Project avoids significant adverse impacts on all international and national statutory designated sites for nature conservation, including SPA, proposed SPA, SAC or candidate SAC.<br>There are also no significant adverse impacts on non-statutory designated sites, habitats such as ancient woodland, priority habitats, important hedgerows and other terrestrial habitats, protected species and other species, including all bird species, in North Lincolnshire. This has been achieved by following the mitigation hierarchy with the design process, and in accordance with the Holford guidance, to avoid impacts where possible. This is demonstrated in **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered**, **Application Document 7.17 Strategic Options Report Including Needs Case** and **Application Document 5.9 Design Development Report**. |
| Policy LC2: Sites of Special Scientific Interest and National Nature Reserves | Proposals for development in, or likely to affect, Sites of Special Scientific Interest will be subject to special scrutiny. Where such development may have an adverse effect, directly or indirectly on the SSSI, it will not be permitted unless the reasons for the development clearly outweigh the nature conservation value of the site itself and the national policy to safeguard the national network of such sites.<br>Where a site is a National Nature Reserve (NNR) or a site identified under the Nature Conservation Review (NCR) or Geological Conservation Review (GCR) particular regard will be paid to the individual site's national importance.<br>In all cases where development is permitted which would damage the nature conservation value of the site, such damage should be kept to a minimum. Where development is permitted the use of conditions or planning obligations to ensure the protection and enhancement of the site's nature conservation value and other appropriate compensatory measures will be considered. | Following the implementation of embedded, control and additional mitigation measures, **Application Document 6.8 Environmental Statement Chapter 8 Ecology and Application Document 6.9 Environmental Statement Chapter 9 Ornithology** conclude that the Project avoids significant adverse impacts on any SSSIs, NNRs, NCRs or GCRs in North Lincolnshire.<br>There are also no significant adverse impacts on all international and national statutory designated sites for nature conservation, non-statutory designated sites, habitats such as ancient woodland, priority habitats, important hedgerows and other terrestrial habitats, protected species and other species, including all bird species, in North Lincolnshire. This has been achieved by following the mitigation hierarchy with the design process, and in accordance with the Holford guidance, to avoid impacts where possible. This is demonstrated in **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered**, **Application Document 7.17 Strategic Options Report Including Needs Case** and **Application Document 5.9 Design Development Report**. |
| Policy LC4: Development Affecting Sites of Local Nature Conservation Importance | Any development or land use change which is likely to have an adverse impact on a Local Nature Reserve, a Site of Importance for Nature Conservation or a Regionally Important Geological Site will not be approved unless it can be clearly demonstrated that there are reasons for the proposal which outweigh the need to safeguard the intrinsic nature conservation value of the site or feature.<br>In all cases where development is permitted which may damage the nature conservation value of the site, such damage shall be kept to a minimum. Where development is permitted the use of conditions or planning obligations to ensure the protection and enhancement of the site's nature conservation value and other appropriate compensatory measures will be considered. | Following the implementation of embedded, control and additional mitigation measures, **Application Document 6.8 Environmental Statement Chapter 8 Ecology** and **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** conclude that the Project avoids significant adverse impacts on any Local Nature Reserve, Site of Importance for Nature Conservation or a Regionally Important Geological Site in North Lincolnshire. |

| Policy | North Lincolnshire Local Plan – Policy Requirement | Project Compliance |
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| Policy LC5: Species Protection | Planning permission will not be granted for development or land use changes which would have an adverse impact on badgers or species protected by Schedules 1, 5 or 8 of the Wildlife and Countryside Act 1981 (as amended). Where development is permitted that may have an effect on those species, conditions or the use of planning agreements will be considered to:<br>i) facilitate the survival of individual members of the species; and<br>ii) reduce disturbance to a minimum; and<br>iii) provide adequate alternative habitats to sustain at least the current levels of population. | As set out above and in **Application Document 6.8 Environmental Statement Chapter 8 Ecology and Application Document 6.9 Environmental Statement Chapter 9 Ornithology**, following the implementation of embedded, control and additional mitigation measures the Project avoids significant adverse impacts on all international and national statutory designated sites for nature conservation, non-statutory designated sites, habitats such as ancient woodland, priority habitats, important hedgerows and other terrestrial habitats, protected species and other species, including all bird species.<br>As set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, although there is no current requirement to close a main badger sett, areas inside the Order Limits have been included in the event that a main badger sett cannot be retained and must be closed, and an artificial badger sett is required to be created under a granted Natural England badger licence. |
| Policy LC6: Habitat Creation | Provision will be made for the creation of nature reserves and new wildlife habitats both in rural and urban areas. Where appropriate, in granting planning permission, the creation of such areas will be required for the following types of development:<br>i) in association with the reclamation of former mineral workings and waste disposal sites;<br>ii) in association with schemes for derelict land clearance;<br>iii) on land which is no longer required for long term agricultural use. Particular emphasis will be placed on the creation of habitats such as wet and dry heathland, wet woodland and reedbed in keeping with local and national biodiversity targets and provision of habitat for protected species. | As set out in **Application Document 7.3 Register of Environmental Actions and Commitments and Application Document 7.8 Outline LEMP** which are secured by **Application Document 3.1 Draft Development Consent Order**, mitigation planting is proposed as part of the Project and the habitats to be created and/or enhanced in these areas (on-site mitigation) have been designed to provide landscape and visual mitigation while also offering ecological value. Along the proposed overhead line, 60 landscape mitigation planting areas have been identified within the Order Limits to provide landscape and visual mitigation, whilst also delivering ecological benefits. Indicative landscape proposals for each of these areas are shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.<br>Mitigation planting is proposed on agricultural land, including environmental and ecological mitigation, including areas for veteran tree compensation, mitigation planting, BNG mitigation and flood compensation. While those areas used for mitigation purposes are no longer in agricultural use during the operation of the Project, there may be potential benefits as a result of such changes in terms of soil health and soil function.<br>National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project will achieve a minimum of 10% BNG (through on-site and off-site BNG) and has undertaken a BNG assessment (based on Natural England's Statutory Biodiversity Metric 2024 version (as of June 2025)) which is presented in **Application Document 7.1 Biodiversity Net Gain Report**. |
| Policy LC7: Landscape Protection | Where development is permitted within rural settlements or within the open countryside, special attention will be given to the protection of the scenic quality and distinctive local character of the landscape. Development which does not respect the character of the local landscape will not be permitted. | An assessment of landscape and visual impacts of the Project has been carried out in in **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**. The assessments carried out in these chapters have taken consideration of the distinctive local character of the landscape through site surveys, desktop assessments and national and local landscape character assessments, and relevant guidance and policy. **Application Document 5.10 Design Approach Document**, **Application Document 5.9 Design Development Report and Application Document 7.17 Strategic Options Report** Including Needs Case demonstrate how landscape and visual considerations have been intrinsic to the design development of the Project, and how the Project design process was informed by the Holford guidance to avoid impacts where possible in accordance with paragraphs 2.9.16 and 2.9.17 of NPS EN-5.<br>As set out in **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7** Visual, embedded measures that are intrinsic to and built into the design of the Project have been incorporated from the outset to reduce and avoid landscape and visual impacts as far as practicable. Whilst the Project will result in some significant adverse impacts during construction and operation, much of the surrounding landscape is influenced by existing overhead line infrastructure. The Project has been designed to sit in parallel with this infrastructure to minimise the extent of the change, where possible. Therefore, |

| Policy | North Lincolnshire Local Plan – Policy Requirement | Project Compliance |
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| | | the majority of the proposed overhead line would be seen in the context of existing overhead lines, thereby containing the spread of infrastructure.<br>**Application Document 6.6 Environmental Statement Chapter 6 Landscape concludes that following the implementation** of embedded and additional mitigation measures set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, and **Application Document 7.8 Outline Landscape and Ecology Management Plan**, which will be secured by **Application Document 3.1 Draft Development Consent Order**, the Project would result in significant landscape effects at Operation Year 15 on two landscape character types, Flat Drained Farmland LCT (in Route Section C) and RLCT 4a: Unwooded Vales (in Route section E and F) as a result of the proposed overhead line. In addition, **Application Document 6.7 Environmental Statement Chapter 7 Visual** concludes that while there are significant visual impacts on communities and recreational facilities, these are localised to where the proposed overhead line would be located, and mainly within 200 m or 300 m of the relevant receptor.<br>There would be no effects on any National Park, The Broads or National Landscape as a result of the Project.<br>Some significant effects are also anticipated on some landscape character types, and visual effects on communities and recreational receptors during construction, however these are temporary, and construction impacts would be minimised as far as practicable in line with the commitments set out in **Application Document 7.5 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments,** which will be secured by **Application Document 3.1 Draft Development Consent Order**.<br>The scale and impacts of energy projects on the landscape and visually is acknowledged in paragraph 5.10.35 of NPS EN-1 which indicates that '*the scale of energy projects means that they will often be visible across a very wide area*'. Paragraph 5.10.35 goes on to state that '*the Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project*'. Overall, the substantial public benefits and need for the Project including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives and carbon reduction commitments, clearly and demonstrably outweigh the mostly localised adverse impacts to the landscape and visual amenity set out in **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**. |
| Policy LC12: Protection of Trees, Woodland and Hedgerows | Proposals for all new development will, wherever possible ensure the retention of trees, woodland and hedgerows. Particular regard will be given to the protection of these features within the setting of settlements, the protection of ancient woodlands and historic hedgerows and the amenity value of trees within built up areas. Tree preservation orders will be made where trees which contribute to local amenity or local landscape character are at risk. Landscaping and tree and hedgerow planting schemes will be required to accompany applications for new development where it is appropriate to the development and its setting. | **Application Document 7.14 Arboricultural Impact Assessment: Appendix E Veteran Tree Assessment Methodology** explains how the Project has followed the mitigation hierarchy to avoid or minimise impacts to irreplaceable habitats including ancient woodland and veteran trees as far as practicable. These measures and other embedded measures to avoid or minimise impacts to irreplaceable habitats including ancient woodland and veteran trees are set out in **Application Document 7.3 Register of Environmental Actions and Commitments and Application Document 7.8 Outline Landscape and Ecology Management Plan** and include:<br>• Micro-siting of pylons to take into account swing of the proposed overhead lines to minimise the instance where woodland would need to be cleared to avoid the overhead line swing, to avoid or minimise loss of woodland and trees as far as practicable.<br>• Designated ancient woodlands will be protected throughout the works with a minimum exclusion zone of 15 m offset from the edge of the designated ancient woodland. For any necessary works within the Root Protection Areas, an ArbCoW will be consulted to agree the working method, including for example, where breaking ground is required and to remove compaction risks.<br>Control and management measures to be implemented during construction of the Project to limit effects on irreplaceable habitats, such as adherence to good site practices and ensuring legal compliance are included in **Application Document 7.3 Register of Environmental Actions and Commitments and Application Document 7.2 Outline Code of Construction Practice**. Specific |

| Policy | North Lincolnshire Local Plan – Policy Requirement | Project Compliance |
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| | | measures during construction to minimise impacts to irreplaceable habitats such as protective measures, crown management and pruning requirements are set out in **Application Document 7.3 Register of Environmental Actions and Commitments and Application Document 7.8 Outline Landscape and Ecology Management Plan.**<br>**Application Document 6.8 Environmental Statement Chapter 8 Ecology, Application Document 7.14 Arboricultural Impact Assessment and Application Document 7.14 Arboricultural Impact Assessment: Appendix E Veteran Tree Assessment Methodology,** set out detail of the effects of the Project on trees.<br>Following the implementation of embedded, control and management, and additional mitigation, the Project avoids significant adverse impacts on ancient trees and woodland, important hedgerows and veteran trees in North Lincolnshire. |
| Policy LC13: Parks, Gardens and Landscapes of Special Historic Interest | The character and features of parks and gardens of historic or landscape interest will be preserved and enhanced. Development within or adjacent to those listed in the Register of Parks and Gardens of Special Historic Interest, which is maintained by English Heritage, will not be permitted if this would adversely affect their special historic character and appearance or their setting.<br>Where development is permitted the use of conditions or planning obligations to ensure the protection and enhancement of special features will be sought. | The Project would not have any impact on any Parks and Gardens of Special Historic Interest or Landscapes of Special Historic Interest within North Lincolnshire. |
| Policy LC14: Area of Special Historic Landscape Interest | The Isle of Axholme is designated as an area of Special Historic Landscape Interest.<br>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.<br>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.<br>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.<br>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. | Cultural heritage matters were considered in the early stages of siting and design of the project and embedded measures have been intrinsic to the design of the Project to reduce and where possible avoid effects on designated and non-designated heritage assets. **Application Document 5.9 Design Development Report** and **Application Document 7.17 Strategic Options Report Including Needs Case** both provide an overview of the design rationale for the Project. They explain how the Project has sought to avoid or reduce significant environmental effects, including heritage effects, wherever practicable, from the initial option identification and selection stage up to the refinement of the Project in response to feedback, further assessments and design work. Embedded measures include:<br>• To minimise setting change, the Project has been designed, where feasible, to be parallel or close parallel with existing overhead lines to reduce the spread of infrastructure in views. This measure was adopted within the Isle of Axholme Area of Special Historic Landscape Interest, where the proposed overhead line has been close paralleled with the existing overhead line, as much as feasible, to minimise setting change.<br>No significant adverse effects are reported on Isle of Axholme Area of Special Historic Landscape as a result of the Project. |
| Policy HE2: Development in Conservation Areas | All development proposals in, or which affect the setting of, Conservation Areas should preserve or enhance the character and appearance of the area and its setting. The following criteria will be applied in determining applications for development in Conservation Areas:<br>i) development should be of a standard of design which respects the appearance and character of the Conservation Area in terms of its bulk, height, mass, vertical and horizontal emphasis, proportions, layout, siting, landscaping and other matters of design such as roofscape and architectural style and detailing; and<br>ii) development should harmonise with adjoining buildings, preserve or enhance the street scene and should not detract from important existing spaces and views; and<br>iii) building materials should be appropriate to the locality and context and sympathetic to those of existing and nearby buildings in terms of type, texture, colour and size. Walls, gates and fences should be of a type traditionally used in the locality; and | The Project is not located in or affects the setting of any conservation areas in North Lincolnshire. |

| Policy | North Lincolnshire Local Plan – Policy Requirement | Project Compliance |
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| | iv) the development must have a satisfactory means of access which does not detract from the character of the area, not generate excessive traffic and where appropriate should provide for adequate car parking in a way which is sympathetic to the Conservation Area. In instances where there is conflict between the highway requirements and the retention of the character of the area, the latter shall prevail; and<br>v) the development should retain important landscape and ecological features and where possible, include measures to enhance these features; and<br>vi) the development should retain important architectural and historical features such as traditional street furniture and paving measures to enhance them where possible; and<br>vii) the development should avoid the loss of open areas, gaps in frontages, and natural and built features (such as trees, hedges, fences, walls and paving materials) if they are important to the character of the Conservation Area; and<br>viii) the development should not spoil or destroy attractive views and vistas into, within and out of the Conservation Area if they are important to the character of the area.<br>Where appropriate, Article 4 Directions will be made to remove permitted development rights where works otherwise classed as permitted development will potentially have an adverse impact on the special architectural or historical character or appearance of the area. | |
| Policy 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. | National Grid has undertaken an iterative design process taking account of policy requirements, historic landscape character assessments and desk-based and fieldwork analysis in order to minimise and avoid, where possible, harm to the historic environment. In accordance with the mitigation hierarchy, the design of the Project has sought to avoid, reduce or mitigate potentially significant adverse effects on designated and non-designated heritage assets. Design decisions have been made to balance the need to avoid and reduce impacts on heritage assets, along with other environmental, social and operational considerations. Embedded mitigation measures are also incorporated into the design to minimise impacts as far as practicable, as secured in **Application Document 7.3 Register of Environmental Actions and Commitments.**<br>Measures relevant to the control and management of impacts to the historic environment during construction have been included within **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Measures relevant to archaeology are set out within **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**, with archaeological works and management measures during the construction, operation and maintenance phases secured through **Application Document 7.10 Outline Cultural Heritage Management Plan**.<br>The Project would not result in direct harm to or loss of any designated or non-designated heritage assets including Scheduled Ancient Monuments, listed buildings and Conservation Areas within North Lincolnshire. The Project would result in significant adverse effects however on the setting of one designated heritage assets in North Lincolnshire during the operation of the Project as set out in **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage.**<br>Although the Project results in significant effects to designated heritage assets, there would be no substantial harm to any designated or non-designated heritage assets. It is considered that the overriding public benefits and need for the Project (as outlined in section 3 and 7 of **Application Document 5.5 Planning Statement**) would clearly and demonstrably outweigh the significant and less than substantial harm to heritage assets. |
| Policy HE8: Ancient Monuments | 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. | |
| Policy HE9: Archaeological Evaluation | 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.<br>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. | |

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| Policy DS1: General Requirement | A high standard of design is expected in all developments in both built-up areas and the countryside and proposals for poorly designed development will be refused. All proposals will be considered against the criteria set out below:<br>Quality of Design<br>i) The design and external appearance of the proposal should reflect or enhance the character, appearance and setting of the immediate area; and<br>ii) the design and layout should respect and where possible retain and/or enhance the existing landform of the site.<br>Amenity<br>i) No unacceptable loss of amenity to neighbouring land uses should result in terms of noise, smell, fumes, dust or other nuisance, or through the effects of overlooking or overshadowing; and<br>ii) amenity open space in the area should be retained, wherever possible; and<br>iii) no pollution of water, air or land should result which poses a danger or creates detrimental environmental conditions.<br>Where appropriate, conditions will be imposed requiring the provision of landscaping to enhance new development.<br>Conservation<br>i) There should not be an adverse effect on features of acknowledged importance, on or surrounding, the site, including species of plants and animals of nature conservation value (particularly species protected by Schedules 1, 5 and 8 of the Wildlife and Countryside Act 1981), Scheduled Ancient Monuments, archaeological remains, listed buildings and Conservation Areas or trees and woodland covered by Tree Preservation Orders; and<br>ii) the development must ensure the retention of those existing site features that make an important contribution to the character or amenity of the site or the surrounding area; and<br>iii) development proposals should include the results of archaeological assessment, where appropriate, and adequate measures to ensure that there would be no unacceptable impacts on archaeological remains. Conditions will be imposed to secure suitable mitigation at the appropriate time in the development process.<br>Resources<br>i) There should be no conflict with an allocated or approved land-use proposal in the locality nor should the reasonable potential for development of a neighbouring site be prejudiced; and<br>ii) the location and design of developments on the urban fringe (sites adjoining settlement development limits) should take into account the need to minimise the impact of the development on adjoining agricultural land or other countryside interests; and<br>iii) measures to conserve energy will be expected in:<br>a) the design, orientation and layout of buildings; and<br>b) the location of development; and<br>c) improvements to the transport network and in the management of traffic.<br>Utilities and Services<br>i) There should be no reliance on public finances being available to provide infrastructure and services; and<br>ii) suitable on-site drainage should be provided and where there are off-site drainage problems the developer will be expected to overcome them. | *Quality of design*<br>The location and design of the Project is the result of a comprehensive site selection process that was led by the consideration of good design and key environmental and planning constraints to avoid and minimise impacts as early as possible. **Application Document 5.9 Design Development Report** explains where design choices have sought to reduce the environmental effects of the Project and demonstrates that the design has incorporated embedded mitigation to avoid or reduce significant environmental effects where practicable. **Application Document 7.3 Register of Environmental Actions and Commitments** details the embedded measures and additional mitigation measures that have been identified through the Environmental Impact Assessment to avoid or reduce likely significant environmental effects.<br>**Application Document 7.17 Strategic Options Including Needs Case** and section 3 of **Application Document 5.5 Planning Statement** explain that the Project is one of the essential network reinforcements needed to deliver the UK's net zero target and the Clean Power 2030 mission. **Application Document 5.5 Planning Statement** and **Application Document 7.17 Strategic Options Report Including Needs Case** set out that the Project, if consented, would support the UK's net zero target by reinforcing the electricity transmission network between the North of England and the Midlands and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The Project would help meet future energy requirements and support the transition to a net zero economy, and support security and reliability of supply. Without reinforcement, the capacity of the existing network is insufficient to accommodate the connection of proposed new power sources connecting in the area.<br>*Amenity*<br>An assessment of the Project's potential environmental emissions on local amenity and human health has been carried out and is set out across **Application Document 6.15 Environmental Statement Chapter 15 Air Quality**, **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration**, **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**.<br>National Grid has embedded comprehensive measures into the design of the Project to avoid or reduce significant environmental effects that may otherwise be experienced by nearby communities during construction and operation (and maintenance) of the Project. These are detailed within **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Engagement has been undertaken with local Environmental Health Departments to confirm baseline monitoring and agree appropriate mitigation as set out in **Application Document 5.1 Consultation Report**.<br>Whilst unmitigated construction activities have the potential to result in significant effects on amenity due to dust, and less than significant effects due to artificial lighting, the proposed mitigation measures successfully avoid or reduce such emissions to the extent all residual effects are not significant.<br>Following the implementation of the proposed mitigation measures, the temporary residual effects on local amenity and human health are anticipated to be not significant, with no effects identified that would represent a common law or statutory nuisance under section 79(1) of the Environmental Protection Act 1990.<br>Mitigation planting is proposed and the habitats to be created and/or enhanced in these areas (on-site mitigation) have been designed to provide landscape and visual mitigation while also offering ecological value. Along the proposed overhead line, 60 landscape mitigation planting areas have been identified within the Order Limits to provide landscape and visual mitigation, whilst also delivering ecological benefits. Indicative landscape proposals for each of these areas are shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**. |

| Policy | North Lincolnshire Local Plan – Policy Requirement | Project Compliance |
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| | | National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project will achieve a minimum of 10% BNG (through on-site and off-site BNG) and has undertaken a BNG assessment (based on Natural England's Statutory Biodiversity Metric 2024 version (as of June 2025)) which is presented in **Application Document 7.1 Biodiversity Net Gain Report**.<br>Conservation<br>National Grid has undertaken an iterative design process taking account of policy requirements, historic landscape character assessments and desk-based and fieldwork analysis in order to minimise and avoid, where possible, harm to the historic environment. In accordance with the mitigation hierarchy, the design of the Project has sought to avoid, reduce or mitigate potentially significant adverse effects on designated and non-designated heritage assets. Design decisions have been made to balance the need to avoid and reduce impacts on heritage assets, along with other environmental, social and operational considerations. Embedded mitigation measures are also incorporated into the design to minimise impacts as far as practicable, as secured in **Application Document 7.3 Register of Environmental Actions and Commitments.**<br>Measures relevant to the control and management of impacts to the historic environment during construction have been included within **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Further measures relevant to archaeology are set out within **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**, with archaeological works and management measures during the construction, operation and maintenance phases secured through **Application Document 7.10 Outline Cultural Heritage Management Plan**.<br>The Project would not result in physical harm to or loss of any designated or non-designated built heritage assets including Scheduled Ancient Monuments, listed buildings and Conservation Areas within North Lincolnshire. The Project would result in significant adverse effects however on the setting of one designated heritage assets in North Lincolnshire during the operation of the Project as set out in **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage**.<br>*Resources*<br>As set out in, **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism** none of the identified developments or planning applications are expected to experience land take as a result of the construction of the Project, and no extant planning applications or allocations that are expected to be operational before the commencement of construction of the Project are anticipated to experience any significant severance effects during construction of the Project. Therefore, the Project does not preclude any new development or proposed use (e.g. allocated sites) in any of the relevant development plans. Therefore, the Project does not conflict with any allocated or approved land use proposals in the locality nor does it prejudice the potential for development of a neighbouring site.<br>*Utilities and services*<br>**Application Document 7.3 Register of Environmental Actions and Commitments**, which is secured by **Application Document 3.1 Draft Development Consent Order** sets out that temporary infrastructure such as construction compounds, lay down areas (as well as areas where impermeable material will be installed or where heavy equipment would be used) and construction access tracks would be drained using sustainable drainage systems (SuDS) techniques that are suitable for local ground conditions and topography and which are designed to accommodate a 1 in 10-year (10% Annual Exceedance Probability) event, plus a 40% allowance for climate change resilience. These areas will be reinstated after completion of the temporary works, as agreed with the landowner. The design and proposals for SuDS will be confirmed during the detailed design phase of the Project. |

| Policy | North Lincolnshire Local Plan – Policy Requirement | Project Compliance |
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| Policy DS7: Contaminated Land | In the case of proposals for development on land known or strongly suspected as being contaminated, applicants will be required to demonstrate that the level of contamination can be overcome by remedial measures or improvements.<br>Permission will only be granted on contaminated sites where a detailed site survey has been submitted, and a suitable scheme of remedial measures has been agreed to overcome any existing contamination. Conditions will be imposed and/or a planning obligation entered into to secure the implementation of such a scheme at the appropriate time in the development process and to otherwise restrict and control the development. | **Application Document 6.12 Environmental Statement Chapter 12 Geology and Hydrogeology** sets out the potential effects of the Project on geological and hydrogeological receptors including contaminated land. A contamination preliminary risk assessment has also been undertaken and presented in **Application Document 6.12.A2 Environmental Statement Appendix 12.2 Preliminary Contamination Risk Assessment**.<br>As set out in **Application Document 7.3 Register of Environmental Actions and Commitments** embedded measures have been intrinsic to the design of the Project to avoid and reduce significant adverse effects. The Project has been designed with sensitive routeing and siting of infrastructure and temporary works to avoid potentially contaminative sites such as landfills, and sensitive features (such as SPZ 1s) where practicable. Control and management measures are also proposed and set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitment** which will be secured by **Application Document 3.1 Draft Development Consent Order**.<br>**Application Document 6.12.A2 Environmental Statement Appendix 12.2 Preliminary Contamination Risk Assessment** concludes that the majority of the Order Limits is indicated to have remained as undeveloped/agricultural land since the earliest reviewed historical mapping. Therefore, in these areas it is considered that there is a very low risk of a significant source of potential contamination. There are discrete areas within the 250 m study area for the Project where either the historical land use or the current land use have been identified as potentially contaminative.<br>However, following the implementation of embedded and control and management measures proposed in **Application Document 7.3 Register of Environmental Actions and Commitments and Application Document 7.2 Outline Code of Construction Practice,** the PRA concludes that there is a low risk of exposure to any existing contamination through ground disturbance. Therefore, it is considered that the temporary construction impacts from exposure to existing contamination for human health receptors, and groundwater and groundwater receptors would result in an overall negligible effect, which would be not significant. As committed to in **Application Document 7.3 Register of Environmental Actions and Commitments** the PRA will be reviewed once the detailed design of the Project is available to ensure that the assumptions made within the risk assessment are still valid (i.e. that the Project does not disturb any of the sites identified within the PRA). |
| Policy DS12: Light Pollution | Planning applications which involve light generating development including floodlighting will only be permitted where it can be demonstrated that there would be no adverse impact on local amenities. | An assessment of artificial light emissions has been undertaken to determine where the Project may have adverse effects on local amenity and human receptors. The proposed temporary lighting requirements for the Project are described in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project** and subject to assessment in **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**.<br>Exterior and interior lighting would be provided at construction sites and compounds to allow for safe movement and the operation of equipment. All lighting would be designed in accordance with the appropriate design standards and be motion-sensor activated. A typical construction day would consist of 12 hours, which in winter would require working in the dark at either end of the day. For the purposes of the ES, it is therefore assumed that winter working would require lighting at certain sites, but this would not apply Project-wide.<br>Without applying mitigation measures, there would be the potential for temporary light spill and intrusion into adjacent properties. However, proposed standard mitigation and management measures are set out in the **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**. Following the implementation of these proposed standard mitigation measures, the temporary residual effects of construction lighting are not anticipated to be significant. |

| Policy | North Lincolnshire Local Plan – Policy Requirement | Project Compliance |
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| Policy DS13: Groundwater Protection and Land Drainage | All development proposals must take account of the need to secure effective land drainage measures and ground water protection in order to control the level of water in the land drainage system. | **Application Document 7.3 Register of Environmental Actions and Commitments**, which is secured by **Application Document 3.1 Draft Development Consent Order** sets out that temporary infrastructure such as construction compounds, lay down areas (as well as areas where impermeable material will be installed or where heavy equipment would be used) and construction access tracks would be drained using sustainable drainage systems (SuDS) techniques that are suitable for local ground conditions and topography and which are designed to accommodate a 1 in 10-year (10% Annual Exceedance Probability) event, plus a 40% allowance for climate change resilience. These areas will be reinstated after completion of the temporary works, as agreed with the landowner. The design and proposals for SuDS will be confirmed during the detailed design phase of the Project. |
| Policy DS15: Water Resources | Development will not be permitted which would adversely affect the quality and quantity of water resources or adversely affect nature conservation, fisheries and amenity by means of:<br>i) pollution from the development; or<br>ii) water abstraction | An assessment of effects on the water environment, including water quality and resources has been undertaken and is set out in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**. The potential for the Project to compromise objectives established under the Water Framework Directive Regulations has been assessed in **Application Document 7.12 Water Framework Directive Assessment**. The assessment confirms no significant effects are anticipated on water quality and resources as a result of the Project.<br>Measures to mitigate potential adverse effects on the water environment during construction are included in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**. **Application Document 6.11 Environmental Statement Chapter 11 Water Environment** concludes that no significant impacts are anticipated on the water environment as a result of the Project following implementation of mitigation measures. |
| Policy DS16: Flood Risk | Development will not be permitted within floodplains where it would:<br>i) increase the number of people or buildings at risk; or<br>ii) impede the flow of floodwater; or<br>iii) impede access for the future maintenance of watercourses; or<br>iv) reduce the storage capacity of the floodplain; or<br>v) increase the risk of flooding elsewhere; or<br>vi) undermine the integrity of existing flood defences<br>unless adequate protection or mitigation measures are undertaken. | As set out in **Application Document 7.13 Flood Risk Assessment**, the Project will comprise some infrastructure, namely pylons, within Flood Zone 2 and 3 with some of it in the floodplain. Following consultation with the Environment Agency, the requirement for compensatory floodplain storage was identified. Appendix A of the FRA details the floodplain compensation storage proposed and explains that a conservative approach to calculating floodplain storages losses was taken, meaning the suggested volume for compensation areas likely exceeds the requirement. As such, there is the opportunity for the Project to reduce flood risk overall via these floodplain storage compensation areas.<br>It is concluded that during the operational phase, the Project is considered to be at low risk of flooding from all sources assessed due to the mitigation measures built into its design. The Project is not anticipated to increase flood risk elsewhere during its operation as any losses of floodplain storage would be compensated for. New impermeable surfaces would be very localised to pylon bases and rainfall runoff from these areas would be attenuated by surrounding reinstated vegetation and would soak back into the ground. |
| Policy DS17: Overhead Power Lines and High Powered Electrical Installations | The Council will seek to minimise the environmental effects of proposals for overhead power lines of 132kv or over, and high-powered electrical installations. The Council will not support such development within or in locations where the development would have a detrimental impact upon the following areas:<br>i) Special Protection Areas, Special Areas of Conservation and Ramsar sites;<br>ii) SSSIs or other statutory nature conservation sites;<br>iii) Conservation Areas and sites and buildings of historic or archaeological interest, including listed buildings and scheduled monuments;<br>iv) existing committed or allocated housing areas.<br>In view of the substantial practical, technical and cost disadvantages involved, it is only in exceptional circumstances that the Council will seek to have lines placed underground, where this is not damaging to sites of nature conservation value or archaeological | The Project would not have any detrimental impact to SPAs, SACs and Ramsar sites; SSSIs or other statutory nature conservation sites; conservation areas, or existing committed or allocated housing areas.<br>National Grid has undertaken an iterative design process taking account of policy requirements, historic landscape character assessments and desk-based and fieldwork analysis in order to minimise and avoid, where possible, harm to the historic environment. In accordance with the mitigation hierarchy, the design of the Project has sought to avoid, reduce or mitigate potentially significant adverse effects on designated and non-designated heritage assets.<br>As set out in section 10.8 of **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage**, measures have been embedded into the design of the Project, including the following: |

| Policy | North Lincolnshire Local Plan – Policy Requirement | Project Compliance |
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| | importance. Careful line routing will usually be the most appropriate way to minimise the visual impact of high voltage power lines.<br>To ensure a satisfactory built environment the Council will have regard to the amenity of potential future occupiers in determining applications for development close to overhead power lines. | • To minimise setting change, the Project has been designed, where feasible, to be parallel or close parallel with existing overhead lines to reduce the spread of infrastructure in views. This measure was adopted within the Isle of Axholme Area of Special Historic Landscape Interest, where the proposed overhead line has been close paralleled with the existing overhead line, as much as feasible, to minimise setting change.<br>• Informed by feedback from local communities, Historic England and from Cultural Heritage Advisors (Archaeological Advisors and Conservation Officers) to the relevant local planning authorities, the route has been diverted, where feasible, to preserve or minimise change to the settings of heritage assets.<br>• The early identification through fieldwork survey and avoidance, where feasible, of areas of important archaeological remains.<br>Measures relevant to the control and management of impacts to the historic environment during construction have been included within **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**. Further measures relevant to archaeology are set out within **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**, with archaeological works and management measures during the construction, operation and maintenance phases secured through **Application Document 7.10 Outline Cultural Heritage Management Plan**.<br>The Project would not result in direct harm to or loss of any designated or non-designated heritage assets including Scheduled Ancient Monuments, archaeological remains, listed buildings and Conservation Areas within North Lincolnshire. The Project would result in significant adverse effects however on the setting of one designated heritage assets in North Lincolnshire during the operation of the Project as set out in **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage.**<br>In conclusion, the Project has undergone an iterative design process, following the mitigation hierarchy in seeking to protect and conserve heritage assets where practicable. The route has been sited and designed to minimise environmental impacts and impacts to heritage assets where possible, following a robust and comprehensive assessment of alternatives to try and avoid impacts to designated and non-designated heritage assets. Mitigation is embedded into the Project design and working practices to reduce impacts as far as practicable. There is also a clear and demonstrable public need and benefit of the Project, which is considered to outweigh significant effects to the setting of heritage assets.<br>*Undergrounding*<br>At an early stage of design development, a preliminary assumption was made to underground a section of the existing 400 kV ZDA overhead line between Ealand and west of Keadby to facilitate the crossing of the proposed new overhead line. As set out in **Application Document 7.20 Design Development Report - 2025**, a detailed appraisal of alternative crossing solutions was subsequently undertaken, including both underground and overhead options, having regard to the technical feasibility, environmental and socio-economic effects, cost and programme considerations. This process identified an overhead 'diamond duck under' crossing as the preferred solution, as it utilises and modifies existing infrastructure, reduces land take and construction complexity. It also avoids the greater environmental effects, carbon intensity and costs associated with undergrounding high-voltage transmission circuits. Having regard to NPS EN-5 and National Grid's statutory duties, this approach was considered to represent the most appropriate and proportionate solution, and undergrounding was not taken forward in this location.<br>*Amenity*<br>National Grid has had regard to the amenity of potential future occupiers close to overhead power lines. **Application Document 5.3 Statement of Statutory Nuisance** describes the matters that constitute 'statutory nuisances' within section 79(1) of the Environmental Protection Act 1990 and |

| Policy | North Lincolnshire Local Plan – Policy Requirement | Project Compliance |
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| | | concludes that following the implementation of the proposed mitigation measures, the temporary residual effects on local amenity and human health are anticipated to be not significant, with no effects identified that would represent a common law or statutory nuisance under section 79(1) of the Environmental Protection Act 1990. |
| Policy DS21: Renewable Energy | Proposals for the generation of energy from renewable resources will be permitted provided that:<br>i) any detrimental effect on features and interests of acknowledged importance, including local character and amenity, is outweighed by environmental benefits; and<br>ii) proposals include details of associated developments including access roads and other ancillary buildings and their likely impact upon the environment.<br>Where appropriate, conditions will be imposed requiring the restoration of the site to its original condition or the implementation of an agreed scheme of after-use and restoration. | In terms of the overall planning balance, the clear and substantial benefits of the Project clearly outweigh any adverse impacts. The presumption in favour of consent in NPS EN-1 sets out that these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure and that any tests set out in the NPS or other planning policy are to be treated as if they have been met. |

## 2.8 Bassetlaw Local Plan (2024)

Table 2.8 – Signposting for Compliance with the Bassetlaw Local Plan (2024)

| Policy | Bassetlaw Local Plan Policy Requirement | Project Compliance |
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| Policy ST33: Design Quality | 1. All development must be of a high quality design that:<br>a) has a clear function, character and identity based upon a robust understanding of local context, constraints and distinctiveness, while reflecting the principles of relevant national and local design guidance, including Sport England's Active Design principles, the Bassetlaw Design Quality SPD and the Bassetlaw Design Code;<br>b) uses land efficiently and ensures density reflects local character:<br>i. within the Main Towns of Worksop, Retford and Harworth & Bircotes the density on sites in and adjoining town centres and transport hubs should be maximised, whilst densities elsewhere within the development boundary should be a minimum of 30 dwellings per hectare (net) unless it would result in an adverse effect on the character of the area, including the setting of a heritage asset and/or the integrity of a natural asset;<br>ii. within the Large Rural Settlements and Small Rural Settlements densities should reflect the character of the settlement and local housing needs, unless otherwise promoted through a neighbourhood plan;<br>iii. HS1: Peaks Hill Farm and HS13: Ordsall South will be expected to deliver a range of housing densities across each site informed by the site's masterplan framework, design code and density plan;<br>c) where appropriate, positively preserves, enhances and integrates landscape and townscape features, and natural and heritage assets;<br>d) respects the local context and complements the landform, layout, building orientation, scale, height, massing, type, materials, details and landscaping of the surrounding areas;<br>e) maximises opportunities to create mixed-use developments which support the function and vitality of the area in which they are located;<br>f) for housing, provides a high standard of accommodation, and does not differentiate between the design quality of market and affordable housing; | The design of the Project has taken into account all relevant national and local design guidance relevant to the Project.<br>Landscape and cultural heritage matters were considered in the early stages of siting and design of the project and embedded measures have been intrinsic to the design of the Project to reduce and where possible avoid effects on landscape and visual receptors and designated and non-designated heritage assets. These measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**. **Application Document 5.9 Design Development Report** and **Application Document 7.17 Strategic Options Report Including Needs Case** both provide an overview of the design rationale for the Project. They explain how the Project has sought to avoid or reduce significant environmental effects, including landscape and heritage effects, wherever practicable, from the initial option identification and selection stage up to the refinement of the Project in response to feedback, further assessments and design work<br>Mitigation planting is proposed in key locations through the Project. The locations of these areas are detailed within **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design** and Table 8.2 of **Application Document 7.8 Outline Landscape and Ecology Management Plan** which sets out a list of the mitigation planting areas proposed within the Order Limits. The habitats to be created and/or enhanced in these areas (on-site mitigation) have been designed to provide landscape and visual mitigation while also offering ecological value. Along the proposed overhead line, 60 landscape mitigation planting areas have been identified within the Order Limits to provide landscape and visual mitigation, whilst also delivering ecological benefits. Indicative landscape proposals for each of these areas are shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.<br>As set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, which is secured by **Application Document 3.1 Draft Development Consent Order**, temporary infrastructure such as construction compounds, lay down areas (as well as areas where impermeable material will be installed or where heavy equipment would be used) and construction access tracks would be drained using sustainable drainage systems (SuDS) techniques that are suitable for local ground conditions and topography and which are designed to |

| Policy | Bassetlaw Local Plan Policy Requirement | Project Compliance |
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| | g) integrates well with surrounding streets and open spaces, provides a clear and legible hierarchy of streets, routes and spaces that prioritises safe, easy and direct pedestrian, cycle and public transport movement, while ensuring the safe, convenient movement of all highway users;<br>h) ensures that all the community, including those with disabilities, can easily and safely access buildings and spaces and move around;<br>i) creates safe communities and reduces the likelihood of crime and the fear of crime through maximising natural surveillance and where appropriate use of active ground floor frontages and lighting;<br>j) incorporates and/or links to a well-defined green/blue infrastructure network of wellmanaged and maintained public and open spaces;<br>k) secures a high quality public realm that is attractive and aesthetically pleasing, that clearly distinguishes between public and private spaces;<br>l) enhances the value of the District's Nature Recovery Network such as through the use of street trees;<br>m) incorporates high quality landscape design and maximises opportunities for greening, particularly where a development site adjoins the countryside;<br>n) is sustainable in design and construction, and utilises modern construction methods and durable materials, where practicable;<br>o) minimises energy consumption by maximising opportunities for passive solar energy and integrating renewable and low carbon technologies where practicable in accordance with Policy ST49;<br>p) mitigates flood risk and water run-off utilising the drainage hierarchy in accordance with Policy ST50, and integrates water management appropriate to place;<br>q) ensures an appropriate level of well-integrated, convenient and visually attractive areas for motor vehicle and cycle parking informed by the most up-to-date Nottinghamshire Parking Standards unless it can be demonstrated that it is not viable or feasible to do so; and provides for external storage including waste disposal;<br>2. Where neighbouring or functionally linked sites come forward together, applicants will be expected to work together to ensure that proposals are, or can be, properly integrated. | accommodate a 1 in 10-year (10% Annual Exceedance Probability) event, plus a 40% allowance for climate change resilience. These areas will be reinstated after completion of the temporary works, as agreed with the landowner. The design and proposals for SuDS will be confirmed during the detailed design phase of the Project. The Project would not result in an increase in flood risk elsewhere; and has been designed to be resilient to flooding throughout its lifetime. |
| Policy ST37: Green and Blue Infrastructure | 1. The connectivity, quality, multifunctionality, biodiversity and amenity value of the green and blue infrastructure network will be enhanced, extended and managed through:<br>a) protecting and enhancing the landscape character and the distinctiveness of Green Gaps, Registered Parks and Gardens and ornamental parklands, registered Common Lands and Village Greens, and Local Green Spaces;<br>b) protecting, enhancing and restoring watercourses, ponds, lakes and water dependent habitats where appropriate;<br>c) providing for biodiversity net gain, including reconnecting vulnerable and priority habitats (see policy ST38);<br>d) protecting and enhancing ancient and mature woodland and hedgerows, and providing for tree planting to secure recreational benefits and/or to aid climate change mitigation;<br>e) making appropriate provision for new green/blue infrastructure in new development including open space, allotments, playing fields and outdoor sports | The location and design of the Project is the result of a comprehensive site selection process that was led by the consideration of good design and key environmental and planning constraints to avoid and minimise impacts as early as possible. **Application Document 5.9 Design Development Report** explains where design choices have sought to reduce the environmental effects of the Project and demonstrates that the design has incorporated embedded mitigation to avoid or reduce significant environmental effects where practicable. **Application Document 7.3 Register of Environmental Actions and Commitments** details the embedded measures and additional mitigation measures that have been identified through the Environmental Impact Assessment to avoid or reduce likely significant environmental effects. The following measures are proposed in relation to blue and green infrastructure features.<br>The Project's aim is to retain existing vegetation wherever practicable in accordance with **Application Document 7.3 Register of Environmental Actions and Commitments**. Where reasonably practicable, construction elements (such as working areas, accesses, laydown and temporary construction compounds) will be kept to the minimum required and micro-sited to avoid impacts on ecologically important features. Overseen and informed by the ECoW and ArbCoW, sensitive habitats will be demarcated to ensure contractors protect as much vegetation as possible. |

| Policy | Bassetlaw Local Plan Policy Requirement | Project Compliance |
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| | facilities, and natural and semi natural greenspace and bluespace; and/or incorporating and where practicable facilitating the improvement of existing provision through the design of development;<br>f) applying climate change mitigation and adaptation measures through new development, including flood risk and watercourse management;<br>g) linking walking and cycling routes, bridleways and public rights of way to and through development, where appropriate;<br>2. The function, setting, and biodiversity, landscape, access and recreational value of the following main and minor green corridors, as identified on the Policies Map will be protected and enhanced:<br>a) Main green corridors<br>i. Chesterfield Canal<br>ii. River Idle<br>iii. River Ryton<br>iv. River Trent<br>b) Minor green corridors<br>i. Trent Valley Way<br>ii. Cuckoo Way<br>iii. National Cycle Route 6<br>iv. River Maun<br>v. Robin Hood Way<br>vi. River Meden<br>vii. River Poulter<br>c) Major development proposals that lie wholly or partly within the minimum buffer zone of a main green corridor (30m measured from each side of the centre point), or a minor green corridor (15m measured from each side of the centre point) should be supported by an Ecological Impact Assessment and/or landscape statement proportionate to the nature and scale of the proposal. This should confirm the extent of the buffer zone in that location and demonstrate how the design and layout of the scheme will positively respond to its green/blue infrastructure location and minimise the environmental effects upon the green corridor.<br>3. All new green and blue infrastructure should be accompanied by appropriate management and maintenance arrangements. | As a general principle, all land which is temporarily impacted by the Project will be reinstated where practicable to its pre-construction condition land use. In addition to the reinstated habitats across the route, there will also be 'mitigation planting areas' located in key locations through the Project. The locations of these areas are detailed within **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design** and Table 8.2 of **Application Document 7.8 Outline Landscape and Ecology Management Plan** sets out a list of the mitigation planting areas proposed within the Order Limits.<br>The habitats to be created and/or enhanced in these areas (on-site mitigation) have been designed to provide landscape and visual mitigation while also offering ecological value. Along the proposed overhead line, 60 landscape mitigation planting areas have been identified within the Order Limits to provide landscape and visual mitigation, whilst also delivering ecological benefits. Indicative landscape proposals for each of these areas are shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.<br>The Project will use existing watercourse crossing points as far as practicable to minimise the introduction of new crossings and associated impacts. Following the completion of works, all temporarily impacted watercourses will be reinstated to their former state, or better. All temporary structures such as culverts, bridges and dams will be removed, and all impacted watercourse features including bank profile, bed levels, and gradients will be reinstated (where not considered an upgrade to an existing culvert). This will include the replacement of any substrate or vegetation that was temporarily removed.<br>National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project will achieve a minimum of 10% BNG (through on-site and off-site BNG) and has undertaken a BNG assessment (based on Natural England's Statutory Biodiversity Metric 2024 version (as of June 2025)) which is presented in **Application Document 7.1 Biodiversity Net Gain Report**. |
| Policy ST38: Biodiversity and Geodiversity | 1. The Council will seek to protect and enhance the biodiversity and geodiversity of Bassetlaw, including:<br>International Sites<br>a) a proposal that may impact on a Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site and/or the Sherwood Forest ppSPA will only be supported where it can be demonstrated that there will be no adverse effects on their integrity, unless there are no alternative solutions and it is justified by an 'imperative reasons of overriding public interest' assessment under the Habitats Regulations;<br>b) any scheme within the 5km buffer zone of the Sherwood Forest ppSPA will require a project level 'shadow level' Habitats Regulations Assessment to | Following the implementation of embedded, control and additional mitigation measures, **Application Document 6.8 Environmental Statement Chapter 8 Ecology** and **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** conclude that the Project avoids significant adverse impacts on all international and national statutory designated sites for nature conservation, non-statutory designated sites, , priority habitats, important hedgerows and other terrestrial habitats, protected species and other species, including all bird species within Bassetlaw. This has been achieved by following the mitigation hierarchy with the design process, and in accordance with the Holford guidance, to avoid impacts where possible. This is demonstrated in **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered**, **Application Document 7.17 Strategic Options Report Including Needs Case** and **Application Document 5.9 Design Development Report**.<br>A significant residual adverse effect is also anticipated on Wood Farm Woodland with Characteristics of Ancient Woodland. National Grid considers that it has applied the mitigation |

| Policy | Bassetlaw Local Plan Policy Requirement | Project Compliance |
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| | ensure any significant adverse effects on the Sherwood Forest ppSPA are identified and appropriately mitigated;<br>National Designations<br>a) a proposal (either individually or in combination with other developments) that may either directly or indirectly adversely impact a Site of Special Scientific Interest (SSSI), National Nature Reserve (NNR) or ancient woodland and their buffer zones will be refused, other than in wholly exceptional circumstances where it can be demonstrated that the benefits of the development in the location proposed clearly outweigh any harm to the special interest features of the asset. In such circumstances measures should be identified through an Ecological Impact Assessment to mitigate the adverse effects resulting from the development.<br>b) proposals of 50 dwellings or more (which includes piecemeal planning applications for less than 50 dwellings within a wider site) that fall within the '10km Impact Risk Zone' of the Clumber Park SSSI will be required to demonstrate that appropriate consideration has been given to the development's impact upon the integrity of that SSSI, including recreational impact. Where relevant, appropriate mitigation measures will be sought, which may include an appropriate design and layout on a development site to protect the integrity of the SSSI, and/or a financial contribution to help mitigate identified impacts at the Clumber Park SSSI.<br>Local Designations and Locally Important Ecological Features<br>a) proposals having a direct or indirect adverse effect on a Local Nature Reserve, Local Wildlife Site or Local Geological Site and their buffer zones or other biodiversity/geodiversity asset, will only be supported where there are no reasonable alternatives; and the case for development clearly outweighs the need to safeguard the ecological, recreational and/or educational value of the site.<br>2. In all cases, where the principle of development is considered appropriate the mitigation hierarchy must be applied so that:<br>a) firstly harm is avoided wherever possible; then<br>b) appropriate mitigation is provided to ensure no net loss or a net gain of priority habitat and local populations of priority species;<br>c) as a last resort, compensation is delivered to offset any residual damage to biodiversity;<br>d) they protect, restore, enhance and provide appropriate buffers around wildlife and geological features at a local and wider landscape-scale to deliver robust ecological networks, to help deliver priorities in the draft Nottinghamshire Biodiversity Opportunity Model for Bassetlaw and Idle Valley 2018 or any successor;<br>e) they establish additional ecological links to the Nature Recovery Network.<br>Biodiversity Net Gain<br>3. In line with national legislation, all new development should make provision for net biodiversity gain on site, or where it can be demonstrated after following the mitigation hierarchy that this is not practicable, off site provision will be considered.<br>4. Management for a minimum of 30 years in accordance with a maintenance scheme will be sought to manage the biodiversity assets in the long term. | hierarchy appropriately in designing the Project to avoid or reduce as far as possible, adverse effects on irreplaceable habitats. The location, routeing and siting of the Project has been designed to avoid and/or reduce impacts on designated ancient woodland and veteran trees as far as practicable.<br>It is acknowledged that significant effects are reported on some areas of Woodlands with Characteristics of Ancient Woodland, which would result in the loss or deterioration of irreplaceable habitat at Wood Farm. Mitigation is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan and Application Document 7.3 Register of Environmental Actions and Commitments** to ensure that impacts are reduced as far as practicable, and compensation planting with a ratio of 3:1 is proposed and is secured in **Application Document 7.8 Outline Landscape and Ecology Management Plan**.<br>Therefore, in accordance with paragraph 5.4.55 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) it is considered that the overriding public need and benefit of the Project (as set out in sections 3 and 7.5 of the **Application Document 5.5 Planning Statement**) would clearly outweigh the loss or deterioration of the habitat, and it would therefore be wholly exceptional. In addition, a relevant compensation strategy is provided within the Order Limits for potential impacts as far as possible and is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>In addition, National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project will achieve a minimum of 10% BNG (through on-site and off-site BNG) and has undertaken a BNG assessment (based on Natural England's Statutory Biodiversity Metric 2024 version (as of June 2025)) which is presented in **Application Document 7.1 Biodiversity Net Gain Report**. |

| Policy | Bassetlaw Local Plan Policy Requirement | Project Compliance |
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| Policy ST39: Trees, woodlands and hedgerows | 1. The Council will protect existing trees, woodland and hedgerows and secure additional planting that increases canopy cover in the interests of biodiversity, amenity and climate change adaptation by:<br>a) retaining, protecting and improving woodland and trees subject to Tree Preservation Orders (TPOs), trees within conservation areas, and 'important' hedgerows as defined by the Hedgerows Regulations 1997;<br>b) making Tree Preservation Orders;<br>c) giving consideration to trees and hedgerows both on individual merit as well as their contribution to amenity and interaction as part of a group within the broader landscape setting;<br>d) resisting the loss or deterioration of ancient woodland and ancient or veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists;<br>e) seeking from major development, provision for new trees or an equivalent financial contribution to help mitigate the impacts of climate change in accordance with Policy ST48.<br>2. Where development would adversely affect trees or hedgerows the application must be accompanied by:<br>a) an accurate tree survey and arboriculture assessment, undertaken by an experienced arboriculturist, of all existing trees and hedgerows on site in accordance with BS5837 (Trees in relation to design, demolition and construction – Recommendations) 2012;<br>b) details of protective measures to be put in place during the development to ensure the health and safety of each specimen and hedgerow to be retained;<br>c) an avoidance and mitigation strategy to include replacement planting for specimens of at least equal amenity and ecological value of a local provenance; and<br>d) a detailed management plan providing details of maintenance arrangements for 10 years. | **Application Document 7.14 Arboricultural Impact Assessment: Appendix E Veteran Tree Assessment Methodology** also explains how the Project has followed the mitigation hierarchy to avoid or minimise impacts to irreplaceable habitats including ancient woodland and veteran trees as far as practicable. It sets out a number of embedded measures incorporated into the Project design to avoid or minimise impacts to irreplaceable habitats including ancient woodland and veteran trees. These are also set out in **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.8 Outline Landscape and Ecology Management Plan** and include:<br>• Micro-siting of pylons to take into account swing of the proposed overhead lines to minimise the instance where woodland would need to be cleared to avoid the overhead line swing, to avoid or minimise loss of woodland and trees as far as practicable.<br>• Designated ancient woodlands will be protected throughout the works with a minimum exclusion zone of 15 m offset from the edge of the designated ancient woodland. For any necessary works within the RPAs, an Arboricultural Clerk of Works (ArbCoW) will be consulted to agree the working method, including for example, where breaking ground is required and to remove compaction risks.<br>• All known veteran trees within, and which have canopy overhanging, the Order Limits will be retained with the exception of T4 Common Oak - *Quercus robur* which cannot be retained if the flexibility afforded by the Limits of Deviation were to be used. The locations of veteran trees are shown within Appendix D of **Application Document 7.14 Arboricultural Impact Assessment**.<br>• National Grid has committed to a 3:1 replacement for individual trees and individual trees within small groups. The Project will prioritise (where possible and practicable) the replanting for individual trees and small groups of individual trees within the Order Limits.<br>Specific measures during construction to minimise impacts to irreplaceable habitats such as adherence to good site practices and ensuring legal compliance, protective measures, crown management and pruning requirements are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.2 Outline Code of Construction Practice**.<br>Although the mitigation hierarchy has been applied and the Project design has intended to avoid impacts on irreplaceable habitats as far as practicable, the residual significant effects on part of Wood Farm are unavoidable.<br>National Grid considers that it has applied the mitigation hierarchy appropriately in designing the Project to avoid or reduce as far as possible, adverse effects on irreplaceable habitats. The location, routeing and siting of the Project has been designed to avoid and/or reduce impacts on designated ancient woodland and veteran trees as far as practicable.<br>Mitigation is secured within **Application Document 7.8 Outline Landscape** and **Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments** to ensure that impacts are reduced as far as practicable, and compensation planting with a ratio of 3:1 is proposed and is secured in **Application Document 7.8 Outline Landscape and Ecology Management Plan**.<br>Therefore, in accordance with paragraph 5.4.55 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) it is considered that the overriding public need and benefit of the Project (as set out in sections 3 and 7.5 of the **Application Document 5.5 Planning Statement**) would clearly outweigh the loss or deterioration of the habitat, and it would therefore be wholly exceptional. In addition, a relevant compensation strategy is provided within the Order Limits for potential impacts as far as possible and is secured within **Application Document 7.8 Outline** |

| Policy | Bassetlaw Local Plan Policy Requirement | Project Compliance |
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| | | **Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>**Application Document 6.8 Environmental Statement Chapter 8 Ecology**, **Application Document 7.14 Arboricultural Impact Assessment** and **Application Document 7.14 Arboricultural Impact Assessment: Appendix E Veteran Tree Assessment Methodology**, set out detail of the effects of the Project on trees.<br>Following the implementation of embedded, control and management, and additional mitigation, the Project avoids significant adverse impacts on designated ancient trees and woodland, important hedgerows and veteran trees, or any TPO's in Bassetlaw. |
| Policy ST40: The Historic Environment | 1. The historic environment will be conserved and enhanced, sensitively managed, enjoyed and celebrated for its contribution to sustainable communities. Proposals will be supported where they:<br>a) give great weight to the conservation and re-use of designated heritage assets and their settings, including for appropriate temporary use, based on their significance in accordance with national policy;<br>b) make a positive contribution to the character and local distinctiveness of the historic environment, including through the use of innovative design;<br>c) positively conserve or enhance a historic designed landscape;<br>d) maintain, conserve, sustain or return to beneficial use designated or non-designated assets;<br>e) capitalise in an appropriate and sensitive manner the regeneration, tourism and energy efficiency potential of heritage assets;<br>f) positively secure the conservation and re-use of 'at risk' heritage assets;<br>g) improve access and enjoyment of the historic environment where appropriate, particularly where they retain, create or facilitate public access to heritage assets to increase understanding of their significance.<br>2. Applicants will be required to submit evidence in line with best practice and relevant national guidance, examining the significance of any heritage assets affected through a Heritage Statement, including any contribution made by their setting. The level of detail should be proportionate to the asset's significance, and the results submitted to the Nottinghamshire Historic Environment Record. In some circumstances, further survey, analysis and/or recording will be made a condition of consent. | National Grid has undertaken an iterative design process taking account of policy requirements, historic landscape character assessments and desk-based and fieldwork analysis in order to minimise and avoid, where possible, harm to the historic environment. In accordance with the mitigation hierarchy, the design of the Project has sought to avoid, reduce or mitigate potentially significant adverse effects on designated and non-designated heritage assets. Design decisions have been made to balance the need to avoid and reduce impacts on heritage assets, along with other environmental, social and operational considerations. Embedded mitigation measures are also incorporated into the design to minimise impacts as far as practicable, as secured in **Application Document 7.3 Register of Environmental Actions and Commitments.**<br>Measures relevant to the control and management of impacts to the historic environment during construction have been included within **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Further measures relevant to archaeology are set out within **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**, with archaeological works and management measures during the construction, operation and maintenance phases secured through **Application Document 7.10 Outline Cultural Heritage Management Plan**.<br>**Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** provides an assessment of potential significant effects on heritage assets, and a Heritage Statement of Harm (Appendix A of **Application Document 5.5 Planning Statement**) has been prepared which assesses the level of harm on designated and non-designated heritage assets as a result of the Project. It concludes that the majority of these would result in less than substantial harm, concluding that in total the Project would result in less than substantial harm to 26 designated heritage assets and 2 Conservation Areas in Bassetlaw. |
| Policy 41: Designated and Non-Designated Heritage Assets | Designated Heritage Assets<br>1. Proposals for development, including change of use, that involve a designated heritage asset, or the setting of a designated heritage asset will be expected to:<br>a) conserve, enhance or better reveal those elements which contribute to the heritage significance and/or its setting;<br>b) respect any features of special architectural or historic interest, including where relevant the historic curtilage or context, its value within a group and/or its setting, such as the importance of a street frontage, traditional roofscape, or traditional shopfronts;<br>c) be sympathetic in terms of its siting, size, scale, height, alignment, proportions, design and form, building technique(s), materials and detailing, boundary treatments and surfacing, or are of a high quality contemporary or innovative nature which complements the local vernacular, in order to retain the special interest that justifies its designation; | National Grid has undertaken an iterative design process taking account of policy requirements, historic landscape character assessments and desk-based and fieldwork analysis in order to minimise and avoid, where possible, harm to the historic environment. In accordance with the mitigation hierarchy, the design of the Project has sought to avoid, reduce or mitigate potentially significant adverse effects on designated and non-designated heritage assets. Design decisions have been made to balance the need to avoid and reduce impacts on heritage assets, along with other environmental, social and operational considerations. Embedded mitigation measures are also incorporated into the design to minimise impacts as far as practicable, as secured in **Application Document 7.3 Register of Environmental Actions and Commitments.**<br>Measures relevant to the control and management of impacts to the historic environment during construction have been included within **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**. |

| Policy | Bassetlaw Local Plan Policy Requirement | Project Compliance |
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| | d) ensure significant views away from, through, towards and associated with the heritage asset(s) are conserved or enhanced;<br>e) in the case of a Conservation Area, to have regard to the established urban grain and ensure that spaces between and around buildings, such as paddocks, greens, gardens and other gaps, are preserved where they contribute to the Conservation Area's character and appearance.<br>2. Proposals that will lead to substantial harm or total loss of significance will be refused unless the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, and it can be demonstrated that:<br>a) the nature of the heritage asset prevents all reasonable uses of the site;<br>b) no viable use of the heritage asset can be found in the medium term through appropriate marketing that will enable its conservation;<br>c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible;<br>d) the harm or loss is outweighed by the benefit of bringing the site back into use.<br>3. Proposals that would result in less than substantial harm to the significance of a designated heritage asset will only be supported where it can be demonstrated that the public benefits will outweigh any harm identified.<br>Non-Designated Heritage Assets<br>4. Proposals for development, including change of use, that involve a non-designated heritage asset, or the setting of a non-designated heritage asset will be expected to:<br>a) have regard to the significance of the asset and its relationship with its setting;<br>b) be sympathetic to the local vernacular in terms of siting, size, scale, height, alignment, design and form; proportions, materials;<br>5. Proposals that will lead to harm to or loss of significance of a non-designated heritage asset will only be supported where it can be demonstrated that:<br>a) the asset's architectural or historic significance is proven to be minimal; or<br>b) through an up-to-date structural report produced by a suitably qualified person, the asset is not capable of viable repair; or<br>c) through appropriate marketing, the asset has no viable use; or<br>d) the public benefits of the scheme outweigh the loss of significance.<br>Archaeological sites<br>6. Where evidence suggests that significant archaeological remains exist on site, proposals should be supported by an appropriate archaeological evaluation that provides an assessment of the significance of the remains and considers how the remains would be affected by the proposed development.<br>7. Where the 'in situ' preservation of archaeological remains is not possible or desirable, suitable provision shall be made by the developer for the excavation, recording, analysis, storage, relocation of assets and archiving, in accordance with a Written Scheme of Investigation that has been approved by the Local Planning Authority. | Further measures relevant to archaeology are set out within **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**, with archaeological works and management measures during the construction, operation and maintenance phases secured through **Application Document 7.10 Outline Cultural Heritage Management Plan**.<br>**Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** provides an assessment of potential significant effects on heritage assets, The Project would result in significant adverse effects however on the setting of 12 designated heritage assets in Bassetlaw during the operation of the Project as set out in **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage.**<br>A Heritage Statement of Harm (Appendix A of **Application Document 5.5 Planning Statement**) has been prepared which assesses the level of harm on designated and non-designated heritage assets as a result of the Project. It concludes that the majority of these would result in less than substantial harm, concluding that in total the Project would result in less than substantial harm to 26 designated heritage and 2 Conservation Areas assets in Bassetlaw.<br>Although the Project results in significant effects to designated heritage assets, there would be no substantial harm to any designated or non-designated heritage assets. It is considered that the overriding public benefits and need for the Project (as outlined in section 3 and 7 of **Application Document 5.5 Planning Statement**) would clearly and demonstrably outweigh the significant and less than substantial harm to heritage assets.<br>Therefore, the Project is in accordance with 5.9.11 to 5.9.14, 5.9.16, 5.9.18 to 5.9.22, 5.9.23 to 5.9.29, 5.9.34 and 5.9.37 of NPS EN-1, NPS EN-5, NPPF, NPPG and relevant local policies relating to cultural heritage. |
| Policy ST42: Promoting Healthy, Active Lifestyles | 1. The Council, with its partners will create an environment which supports healthy, active, inclusive and safe communities. Healthy, active and safe lifestyles will be enabled by:<br>a) working in partnership with the health authorities to maintain, and where practicable, improve access to the full range of health services for residents, | Provision g) and h) of this policy is of relevant to the Project.<br>**Application Document 6.15 Environmental Statement Chapter 15 Air Quality** provides an assessment of the likely effects on air quality that would result from the Project and considers the baseline conditions and the likely changes and effects to air quality levels during the construction phase. The assessment confirms there would not be a deterioration in air quality or substantial |

| Policy | Bassetlaw Local Plan Policy Requirement | Project Compliance |
|---|---|---|
| | including through the co-location of health facilities with other community facilities, open space and sports facilities, through multi-purpose buildings and sites;<br>b) facilitating access to a range of high quality, well maintained and accessible open space and play areas, woodland, blue infrastructure, leisure and cultural facilities;<br>c) improving the quantity, quality and accessibility to playing pitches and sports facilities;<br>d) supporting initiatives which improve access to locally grown food at for example, allotments or community gardens;<br>e) creating high-quality, inclusive environments that incorporate active design principles and where practicable, increase opportunities for movement through a network of well-connected sustainable travel routes, public rights of way and towpaths to everyday shops and services;<br>f) supporting energy efficient design of development, where practicable;<br>g) ensuring that the current air quality in the District is maintained and, where possible improved;<br>h) minimising and mitigating against potential harm from risks such as pollution and other environmental hazards and climate change;<br>i) facilitating the provision of optimal digital infrastructure in accordance with Policy ST55 to allow reliable connection to a range of online services;<br>2. All proposals of 50 or more dwellings will be required to submit a Rapid Health Impact Assessment Matrix as part of the planning application. The Council will recognise high performing schemes through Healthy Bassetlaw – a health accreditation scheme for well-designed healthy development proposals. | changes in air quality levels and therefore significant adverse effects on air quality are not anticipated as a result of the Project.<br>The ES assesses the risk of the Project on pollution in:<br>• **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**;<br>• **Application Document 6.15 Environmental Statement Chapter 15 Air Quality**;<br>• **Application Document 6.12.A2 Environmental Statement Appendix 12.2 Preliminary Contamination Risk Assessment**;<br>• **Application Document 6.11.A2 Environmental Statement Appendix 11.2 Water Resource Assessment**;<br>• **Application Document 6.16.A4 Environmental Statement Appendix 16.4 Construction Traffic Noise and Vibration Assessment**;<br>• **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport**;<br>• **Application Document 6.15.A2 Environmental Statement Appendix 15.2 Construction Dust Methodology**; and<br>• **Assessment, and Application Document 6.15.A3 Environmental Statement Appendix 15.3 Construction Vehicle Emissions Modelling**.<br>No significant adverse effects are anticipated in relation to pollution following the implementation of mitigation measures set out in **Application Document 7.3 Register of Environmental Actions and Commitments**. |
| Policy 46: Protecting Amenity | 1. Proposals for development should be designed and constructed to avoid and minimise impacts on the amenity of existing and future users, individually and cumulatively, within the development and close to it. As such, proposals will be expected to:<br>a) not have a significant adverse effect on the living conditions of existing and new residents and future occupiers of the proposed development through loss of privacy, excessive overshadowing or overbearing impact; and<br>b) not generate a level of activity, noise, light, air quality, odour, vibration or other pollution which cannot be mitigated to an appropriate standard.<br>2. Proposals for development adjacent to, or in the locality of, existing 'bad neighbour' uses such as waste sites, incinerators, chemical production, heavy industry and businesses with out of normal hour (9-5) operations, will need to demonstrate that:<br>a) the ongoing use of the neighbouring site is not compromised; and<br>b) the amenity of future occupiers of the new development can be achieved in accordance with Part 1 of this policy with the ongoing normal use of the neighbouring site;<br>3. Where the development of a new bad neighbour business or change of use could have a significant adverse effect on residential amenity, appropriate mitigation will be required before the development can be occupied. | Siting, design, and construction methodologies for the Project have adhered to the mitigation hierarchy from inception, seeking to avoid and minimise adverse impacts on the amenity and living conditions of nearby residents and communities within Bassetlaw District. Potential effects on amenity across construction, operation, and maintenance have been evaluated comprehensively in **Application Document 6.15 Environmental Statement Chapter 15 Air Quality**, **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration**, **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, **Application Document 6.6 Environmental Statement Chapter 6 Landscape**, **Application Document 6.7 Environmental Statement Chapter 7 Visual**, and **Application Document 6.18 Environmental Statement Chapter 18 Health and Wellbeing**:<br>• Overshadowing, Privacy, and Overbearing Effects: Linear electricity transmission lines do not generate overlooking, loss of privacy, or habitable overshadowing impacts akin to buildings. Siting and routeing of the 400 kV overhead line have followed the Holford guidance and National Policy Statement EN-5 to maximize separation distances from settlements and residential curtilages across Bassetlaw (including Walkeringham, Beckingham, North Leverton, Treswell, and East Drayton). In addition, standard lattice transmission towers have been selected to provide open, visually permeable structures against the sky, avoiding oppressive or unacceptable overbearing enclosure on domestic amenity. A detailed Residential Visual Amenity Assessment (RVAA) is provided in **Application Document 6.7.A5 Environmental Statement Appendix 7.5 Residential Visual Amenity Assessment**, confirming that the Project will not result in views that would be overwhelming or render any residential property an unattractive place in which to live. |

| Policy | Bassetlaw Local Plan Policy Requirement | Project Compliance |
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| | | • Noise and Vibration: As reported in **Application Document 6.16 Environmental Statement Chapter 16 Noise and Vibration**, potential construction noise and vibration from piling, foundation construction, and heavy plant access will be strictly controlled using Best Practicable Means (BPM). Works will be restricted to core daytime working hours (07:00–19:00 Monday to Friday; 08:00–17:00 Saturdays), with percussive piling and weekend working subject to tight controls under the **Application Document 7.7 Outline Noise and Vibration Management Plan** and the **Application 7.2 Outline Code of Construction Practice**. Operational overhead line noise has been modelled in both dry and wet conditions **Application Document 6.16.A5: Environmental Statement Appendix 16.5 Operational Overhead Line Noise Assessment**, confirming that audible noise from the 400 kV conductors will meet British Standard criteria and will not result in significant adverse effects on residential quality of life.<br>• Dust, Air Quality, and Emissions: Demolition is limited to pylon dismantling, which is not a significant dust-generating activity. Dust soiling risks during earthworks and trackout will be managed through wheel-washing facilities, mandatory vehicle sheeting, speed limits on unpaved haul routes, and targeted water suppression pursuant to the Dust Management Plan within the **Application Document 7.2 Outline Code of Construction Practice**. Following mitigation, residual air quality and dust effects will be temporary and not significant. Infrequent, routine operational inspections using light vehicles will generate no perceptible dust or emissions.<br>• Artificial Light and Visual Intrusion: Temporary construction lighting will be localised, directional, motion-sensor activated, and fitted with hoods/cowls to prevent light spill, sky glow, or glare into nearby habitable windows, compliant with commitment GG21 of **Application Document 7.3 Register of Environmental Actions and Commitments**. There is no requirement for permanent operational lighting along the overhead line route.<br>• Odour, Steam, and Statutory Nuisance: As demonstrated in **Application Document 5.3 Statement of Statutory Nuisance**, the Project produces no steam, odour, or effluvia capable of generating nuisance or prejudicing human health during construction or operation. With embedded controls in place, no breach of section 79(1) of the Environmental Protection Act 1990 will occur.<br>• Neighbouring Uses and Inter-project Coordination: Siting has safeguarded existing commercial operations, industrial infrastructure, and utilities across Bassetlaw, maintaining standard electrical safety clearances and coordinating cumulative interfaces as detailed in **Application Document 5.11 Interrelationship Document** and **Application Document 6.21 Environmental Statement Chapter 2: Inter-project Cumulative Effect)**.<br>Following the implementation of embedded mitigation secured under Requirements 4, 7, and 8 of the **Application Document 3.1 Draft Development Consent Order,** residual effects on local amenity and human health will be not significant, ensuring full compliance with Policy 46. |
| Policy 47: Contaminated and Unstable Land | 1. Where development is considered to be on contaminated land and/or unstable land, through an appropriate contamination assessment and/or land instability risk assessment, proposals should:<br>a) ensure that all works, including investigation of the nature of any contamination or land instability, and removal of materials can be undertaken without causing unacceptable risk to health, waterways, other watercourses and sources of groundwater, or to the environment;<br>b) identify the nature and extent of existing unstable land and/or contaminated land and the level of risk that contaminants/instability could pose in relation to the proposed development and its users, and adjoining land; | **Application Document 6.12 Environmental Statement Chapter 12 Geology and Hydrogeology** sets out the potential effects of the Project on geological and hydrogeological receptors including contaminated land. A contamination preliminary risk assessment has also been undertaken and presented in **Application Document 6.12.A2 Environmental Statement Appendix 12.2 Preliminary Contamination Risk Assessment**.<br>As set out in **Application Document 7.3 Register of Environmental Actions and Commitments** embedded measures have been intrinsic to the design of the Project to avoid and reduce significant adverse effects. The Project has been designed with sensitive routeing and siting of infrastructure and temporary works to avoid potentially contaminative sites such as landfills, and sensitive features (such as SPZ 1s) where practicable. Control and management measures are also proposed and set out in **Application Document 7.2 Outline Code of** |

| Policy | Bassetlaw Local Plan Policy Requirement | Project Compliance |
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| | c) ensure appropriate mitigation measures are identified and implemented which are suitable for the proposed use and that the occupiers and neighbouring uses are not exposed to an unacceptable level of risk;<br>d) demonstrate that the developed site, will be suitable for the proposed use without risk from contaminants/instability to people, buildings, services or the environment including the apparatus of statutory undertakers. | **Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitment** which will be secured by **Application Document 3.1 Draft Development Consent Order**.<br>**Application Document 6.12.A2 Environmental Statement Appendix 12.2 Preliminary Contamination Risk Assessment** concludes that the majority of the Order Limits is indicated to have remained as undeveloped/agricultural land since the earliest reviewed historical mapping. Therefore, in these areas it is considered that there is a very low risk of a significant source of potential contamination. There are discrete areas within the 250 m study area for the Project where either the historical land use or the current land use have been identified as potentially contaminative.<br>However, following the implementation of embedded and control and management measures proposed in **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.2 Outline Code of Construction Practice,** the PRA concludes that there is a low risk of exposure to any existing contamination through ground disturbance. Therefore, it is considered that the temporary construction impacts from exposure to existing contamination for human health receptors, and groundwater and groundwater receptors would result in an overall negligible effect, which would be not significant. As committed to in **Application Document 7.3 Register of Environmental Actions and Commitments** the PRA will be reviewed once the detailed design of the Project is available to ensure that the assumptions made within the risk assessment are still valid (i.e. that the Project does not disturb any of the sites identified within the PRA). |
| Policy ST48: Reducing Carbon Emissions, Climate Change Mitigation and Adaptation | 1. All proposals, including the change of use of existing buildings and spaces, should be designed to improve resilience to the anticipated effects of climate change taking into account the design principles in the Bassetlaw Design Quality SPD and the Bassetlaw Design Code. Proposals should incorporate, where appropriate, the following measures that address issues of climate change mitigation and adaptation through:<br>a) ensuring no unacceptable adverse impact on local air quality;<br>b) designing layouts so that the orientation of buildings and spaces maximise opportunities for solar gain;<br>c) providing space for habitats and species to move through the landscape and for the operation of natural processes to occur;<br>d) where possible, minimising the use of natural resources over the development's lifetime, such as minerals and consumable products, by reuse or recycling of materials in construction, and by making the best use of existing buildings and infrastructure;<br>e) adapting surface materials and drainage design to reduce the risk of flooding to land, property and people as a result of more extreme rainfall in accordance with Policy ST50;<br>f) using integrated water management systems to manage runoff and provide a nonpotable water supply;<br>g) providing green/blue infrastructure, and where possible, retaining existing trees and woodlands to reduce the 'urban heating effect' during warmer summers; and<br>h) using urban greening methods within the design of new buildings.<br>2. All new non residential development of 1000sqm floorspace or more will be required to meet the BREEAM very good-excellent standards or equivalent. | The location and design of the Project is the result of a comprehensive site selection process that was led by the consideration of good design and key environmental and planning constraints to avoid and minimise impacts as early as possible. **Application Document 7.17 Strategic Options Report Including Needs Case**, **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study** and **Application Document 7.19 Supplementary Corridor and Routeing Report, Application Document 7.20 Design Development Report - 2025** and **Application Document 5.9 Design Development Report** set out in detail the design rationale and process undergone to determine the location, and design of the Project.<br>The Project delivers good design that is sustainable, in accordance with the design policies set out in the NPSs which acknowledge that any design decisions must reflect the need to efficiently deliver large-scale energy infrastructure, and therefore (as recognised in national policy), the extent to which a scheme can contribute to the enhancement of the quality of the area is limited. Through the design process presented in the suite of design documents submitted with the Application, the Project will deliver high quality design which has responded to the local and surrounding context in accordance with relevant local planning policies.<br>The Project has been designed and assessed considering the effects of climate change and has been designed to be resilient to climate change. The below sections address the relevant parts of this policy to the Project:<br>*Air quality*<br>**Application Document 6.15 Environmental Statement Chapter 15 Air Quality** provides an assessment of the likely effects on air quality that would result from the Project and considers the baseline conditions and the likely changes and effects to air quality levels during the construction phase. The assessment confirms there would not be a deterioration in air quality or substantial changes in air quality levels and therefore significant adverse effects on air quality are not anticipated as a result of the Project. |

| Policy | Bassetlaw Local Plan Policy Requirement | Project Compliance |
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| | 3. All new residential development in the District should promote water efficiency by meeting the tighter Building Regulations optional requirement of 110 litres/person/day.<br>4. All major development will be required to make provision for 5 trees per dwelling or per 1,000 sqm of non residential floorspace on site, or if on site provision is not practicable then an equivalent financial contribution will be sought to enable provision of new native trees and/or the protection and enhancement of ancient and veteran woodland within the District. | *Surface water*<br><br>**Application Document 7.3 Register of Environmental Actions and Commitments**, which is secured by **Application Document 3.1 Draft Development Consent Order** sets out that temporary infrastructure such as construction compounds, lay down areas (as well as areas where impermeable material will be installed or where heavy equipment would be used) and construction access tracks would be drained using sustainable drainage systems (SuDS) techniques that are suitable for local ground conditions and topography and which are designed to accommodate a 1 in 10-year (10% Annual Exceedance Probability) event, plus a 40% allowance for climate change resilience. These areas will be reinstated after completion of the temporary works, as agreed with the landowner. The design and proposals for SuDS will be confirmed during the detailed design phase of the Project.<br>*Flood risk*<br><br>**Application Document 7.13 Flood Risk Assessment** concludes that from the outset of the Project, a sequential approach has been taken to siting infrastructure for the Project, particularly those elements that are vulnerable to inundation, as evidenced in **Application Document 7.17 Strategic Options Report Including Needs Case**.<br>During construction, the FRA concludes that following the application of a sequential approach and a lack of proximate feasible alternatives as detailed in **Application Document 7.17 Strategic Options Report Including Needs Case**, three construction compounds are located in Flood Zone 3, in addition to some temporary haul roads and construction access which must necessarily be located in Flood Zones 2 and 3. The FRA concludes, however, that these risks would be reduced and managed by implementing a range of mitigation measures set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, including those detailed in a Flood Warning and Evacuation Plan, and by programming construction activities in floodplains to avoid periods of likely high river levels where practicable. Following the implementation of these measures, the residual risk is medium for fluvial and tidal flooding, and low for surface water and groundwater. Overall the construction of the Project results in no significant effects in relation to flood risk, as set out in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**.<br>During operation, due to its linear nature and the geographical extent of the Project, while the siting of pylons within the defended floodplain has largely been avoided, some operational Project components, namely pylons, must necessarily be located in Flood Zones 2 and 3 with some areas being within the floodplain.<br>The Exception Test set out in Policy F6 of the NPPF is therefore triggered, and the FRA provides the evidence of how the Project satisfies this test. The FRA concludes that, with regard to the test, the Project is a NSIP that would play an important role in delivering renewable electricity efficiently, reliably and safely and would support the UK's move towards net zero, therefore it would provide wider sustainability benefits to the community that outweigh flood risk.<br>In addition, permanent Project infrastructure which lies within areas at risk of fluvial or tidal flooding only comprises a small number of pylons. These pylons are resilient to flooding, given their concrete bases and metal lattice structures which would not be impacted by floodwaters, and so ensure the Project would be safe and could continue to operate in times of flood. A suite of measures would be adopted, as described in Table 3.1 of **Application Document 7.13 Flood Risk Assessment** and also set out in **Application Document 7.3 Register of Environmental Actions and Commitments** which is secured by **Application Document 3.1 Draft Development Consent Order**, to prevent flood risk increases during operation of the Project.<br>Following consultation with the Environment Agency in accordance with paragraph 5.8.18 to 5.8.20 of NPS EN-1, it was stipulated that compensatory storage for pylons within the floodplain would be |

| Policy | Bassetlaw Local Plan Policy Requirement | Project Compliance |
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| | | required. Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 Flood Risk Assessment** sets out the proposed location of floodplain storage compensation areas that are proposed on land outside of the floodplain. The flood storage compensation proposals outlined in Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 Flood Risk Assessment** provide evidence that the Project, on the implementation of flood compensation areas within the same floodplain cell, will not increase the overall water level and therefore does not increase flood risk elsewhere. Furthermore, a conservative approach to calculating floodplain storages losses was taken, meaning the suggested volume for compensation areas likely exceeds the requirement. As such, there is the opportunity for the Project to reduce flood risk overall via these floodplain storage compensation areas.<br>It is therefore concluded that during the operational phase, the Project is considered to be at low risk of flooding from all sources assessed due to the mitigation measures built into its design. The Project is not anticipated to increase flood risk elsewhere during its operation as any losses of floodplain storage would be compensated for. New impermeable surfaces would be very localised to pylon bases and rainfall runoff from these areas would be attenuated by surrounding reinstated vegetation and would soak back into the ground.<br>The Exception Test is therefore concluded to be satisfied, as the Project would bring significant benefits via its delivery of safe, reliable, and renewable electricity; would not result in an increase in flood risk elsewhere; and has been designed to be resilient to flooding throughout its lifetime.<br>*Waste*<br>**Application Document 6.4 Environmental Statement Chapter 4 Description of the Project** sets out the approach taken on the Project to materials and waste. The nature of the Project means that it is difficult to use secondary (reused/recycled) sources during its construction, as this can affect the operation and the design life of the Project. However, National Grid has existing processes in place to obtain materials from sustainable sources and to use recycled materials where these do not compromise the required design standards and operational life of the Project.<br>Temporary materials, such as aggregate for access routes and site compounds, works cabins, and security fencing, would be required during construction. Where practicable, temporary materials would be sourced from other construction projects within the region and reused at other construction projects after completion of the Project.<br>**Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.2 Outline Code of Construction Practice** set out that a SWMP will be developed prior to construction. The SWMP will include but not be limited to:<br>• Waste forecasts;<br>• How waste will be reduced, re-used, managed and disposed of in accordance with the waste hierarchy;<br>• Identification of recovery routes; and<br>• Actual waste figures once work has begun.<br>Consideration will be given to the guidance in The Definition of Waste: Development Industry Code of Practice (DoWCoP). Dedicated waste management areas will be designed to sufficiently accommodate the types and volumes of waste produced and to reduce the environmental risk of storing waste on-site (covered, secured and away from drainage).<br>*Habitat, green infrastructure*<br>The Project's aim is to retain existing vegetation wherever practicable in accordance with **Application Document 7.3 Register of Environmental Actions and Commitments**. Where reasonably practicable, construction elements (such as working areas, accesses, laydown and temporary construction compounds) will be kept to the minimum required and micro-sited to avoid |

| Policy | Bassetlaw Local Plan Policy Requirement | Project Compliance |
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| | | impacts on ecologically important features. Overseen and informed by the ECoW and ArbCoW, sensitive habitats will be demarcated to ensure contractors protect as much vegetation as possible.<br>As a general principle, all land which is temporarily impacted by the Project will be reinstated where practicable to its pre-construction condition land use. In addition to the reinstated habitats across the route, there will also be 'mitigation planting areas' located in key locations through the Project. The locations of these areas are detailed within **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design** and Table 8.2 of **Application Document 7.8 Outline Landscape and Ecology Management Plan** sets out a list of the mitigation planting areas proposed within the Order Limits.<br>The habitats to be created and/or enhanced in these areas (on-site mitigation) have been designed to provide landscape and visual mitigation while also offering ecological value. Along the proposed overhead line, 60 landscape mitigation planting areas have been identified within the Order Limits to provide landscape and visual mitigation, whilst also delivering ecological benefits. Indicative landscape proposals for each of these areas are shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.<br>National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project will achieve a minimum of 10% BNG (through on-site and off-site BNG) and has undertaken a BNG assessment (based on Natural England's Statutory Biodiversity Metric 2024 version (as of June 2025)) which is presented in **Application Document 7.1 Biodiversity Net Gain Report**. |
| Policy ST49: Renewable Energy Generation | 1. Development that generates, shares, transmits and/or stores zero carbon and/or low carbon renewable energy including community energy schemes will be supported subject to the satisfactory resolution of all relevant site specific and cumulative impacts upon:<br>a) location, setting and position in the wider landscape, resulting from its siting and scale;<br>b) natural and heritage assets and their settings;<br>c) air and water quality;<br>d) hydrology and hydrogeology;<br>e) the best and most versatile agricultural land;<br>f) existing highway capacity and highway safety;<br>g) noise, light, glare, smell, dust, emissions or flicker;<br>h) aviation and radar;<br>i) recreation and local amenity.<br>Proposals must take into account operational and approved developments, as well as any proposed intensification to operational or approved proposals.<br>2. Proposals involving one or more wind turbines will be supported where:<br>a) the site is located within an area defined as being suitable for wind energy in a made neighbourhood plan or development plan document; and<br>b) following consultation, it can be satisfactorily demonstrated that all potential adverse planning impacts identified by affected local communities have been fully addressed, including cumulative impacts identified in Part 1 above.<br>3. All renewable energy development will be expected to provide details of the expected power generation based upon expected yield or local self-consumption to enable effective monitoring of the district's contribution to the national zero carbon targets. | The Project is a large scale energy transmission project which would support the UK's net zero target by reinforcing the electricity transmission network between the North of England and the Midlands and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The Project would help meet future energy requirements and support the transition to a net zero economy.<br>It is concluded that the Project is of an appropriate scale to its location, due to it being one of the essential network reinforcements in the North of England and the Midlands needed to deliver the UK's net zero target and the Clean Power 2030 mission, and facilitate the connection of planned renewable energy projects such as offshore wind generation and interconnectors and increase boundary transfer capability. The reinforcement will also support security and reliability of supply. Without reinforcement, the capacity of the existing network is insufficient to accommodate the connection of proposed new power sources connecting in the area.<br>*Location, setting and position in the wider landscape*<br>The location and design of the Project is the result of a comprehensive site selection process that was led by the consideration of good design and key environmental and planning constraints to avoid and minimise impacts as early as possible. **Application Document 5.9 Design Development Report** explains where design choices have sought to reduce the environmental effects of the Project and demonstrates that the design has incorporated embedded mitigation to avoid or reduce significant environmental effects where practicable. **Application Document 7.3 Register of Environmental Actions and Commitments** details the embedded measures and additional mitigation measures that have been identified through the Environmental Impact Assessment to avoid or reduce likely significant environmental effects.<br>**Application Document 6.6 Environmental Statement Chapter 6 Landscape** concludes that the Project would result in significant adverse landscape effects at Operation Year 15 on one landscape character type in Bassetlaw, RLCT 4a: Unwooded Vales (in Route section E and F) as a result of the proposed overhead line.<br>In addition, **Application Document 6.7 Environmental Statement Chapter 7 Visual** concludes that while there are significant visual impacts on communities and recreational facilities, these are |

| Policy | Bassetlaw Local Plan Policy Requirement | Project Compliance |
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| | 4. A decommissioning programme applied by a Condition to any planning permission granted will be required to demonstrate that the site can be returned to an acceptable state, three years after cessation of operations. | localised to where the proposed overhead line would be located, and mainly within 200 m or 300 m of the relevant receptor.<br>There would be no effects on any National Park, The Broads or National Landscape as a result of the Project.<br>As set out in **Application Document 6.6 Environmental Statement Chapter 6 Landscape and Application Document 6.7 Environmental Statement Chapter 7 Visual**, embedded measures that are intrinsic to and built into the design of the Project have been incorporated from the outset to reduce and where possible avoid landscape and visual impacts as far as practicable, as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, and **Application Document 7.8 Outline Landscape and Ecology Management Plan**, which will be secured by **Application Document 3.1 Draft Development Consent Order**.<br>The scale and impacts of energy projects on the landscape and visually is acknowledged in paragraph 5.10.35 of NPS EN-1 which indicates that '*the scale of energy projects means that they will often be visible across a very wide area'.* Paragraph 5.10.35 goes on to state that '*the Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project'*. Overall, the substantial public benefits and need for the Project, as set out in section 3 of **Application Document 5.5 Planning Statement**, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives and carbon reduction commitments, clearly and demonstrably outweigh the mostly localised adverse impacts to the landscape and visual amenity set out in **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**.<br>*Natural environment*<br>Following the implementation of embedded, control and additional mitigation measures, **Application Document 6.8 Environmental Statement Chapter 8 Ecology** and **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** conclude that the Project avoids significant adverse impacts on all international and national statutory designated sites for nature conservation, non-statutory designated sites, , priority habitats, important hedgerows and other terrestrial habitats, protected species and other species, including all bird species within Bassetlaw. This has been achieved by following the mitigation hierarchy with the design process, and in accordance with the Holford guidance, to avoid impacts where possible. This is demonstrated in **Application Document 6.3 Environmental Statement Chapter 3 Main Alternatives Considered**, **Application Document 7.17 Strategic Options Report Including Needs Case** and **Application Document 5.9 Design Development Report**.<br>A significant residual adverse effect is also anticipated on Wood Farm Woodland with Characteristics of Ancient Woodland. National Grid considers that it has applied the mitigation hierarchy appropriately in designing the Project to avoid or reduce as far as possible, adverse effects on irreplaceable habitats. The location, routeing and siting of the Project has been designed to avoid and/or reduce impacts on designated ancient woodland and veteran trees as far as practicable.<br>It is acknowledged that significant effects are reported on some areas of Woodlands with Characteristics of Ancient Woodland, which would result in the loss or deterioration of irreplaceable habitat at Wood Farm. Mitigation is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan and Application Document 7.3 Register of Environmental Actions and Commitments** to ensure that impacts are reduced as far as practicable, and compensation planting with a ratio of 3:1 is proposed and is secured in **Application Document 7.8 Outline Landscape and Ecology Management Plan**.<br>Therefore, in accordance with paragraph 5.4.55 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) it is considered that the overriding public need and benefit of the Project (as |

| Policy | Bassetlaw Local Plan Policy Requirement | Project Compliance |
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| | | set out in sections 3 and 7.5 of the **Application Document 5.5 Planning Statement**) would clearly outweigh the loss or deterioration of the habitat, and it would therefore be wholly exceptional. In addition, a relevant compensation strategy is provided within the Order Limits for potential impacts as far as possible and is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>In addition, National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project will achieve a minimum of 10% BNG (through on-site and off-site BNG) and has undertaken a BNG assessment (based on Natural England's Statutory Biodiversity Metric 2024 version (as of June 2025)) which is presented in **Application Document 7.1 Biodiversity Net Gain Report**.<br>*Heritage*<br>**Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** concludes that the Project would result in significant adverse effects on the setting of 9 designated heritage assets in Bassetlaw. The Heritage Statement of Harm (Appendix A of **Application Document 5.5 Planning Statement**) concludes that the majority of these would result in less than substantial harm, concluding that in total the Project would result in less than substantial harm to 26 designated heritage assets and 2 Conservation Areas.<br>In accordance with NPS EN-1 paragraphs 5.9.29 and 5.9.33, the NPPF and NPPG, the substantial public benefits and need for the Project, as set out in sections 3 and 8 of **Application Document 5.5 Planning Statement**, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives is considered to clearly and demonstrably outweigh the less than substantial harm at the lower end and middle of the spectrum to the designated and non-designated heritage assets affected.<br>*The Best and Most Versatile agricultural land;*<br>Agricultural land has been an important consideration from the outset of the Project's design, from siting to design development as demonstrated in **Application Document 7.17 Strategic Options Report Including Needs Case** and **Application Document 5.10 Design Approach Document**. In accordance with paragraph 5.11.12 of NPS EN-1 (Department for Energy Security and Net Zero, 2025), National Grid has, along with balancing operational, cost, safety, environmental and socio-economic factors, sought to minimise impacts on BMV agricultural land, and use land in areas of poorer quality where possible.<br>**Application Document 6.13 Environmental Statement Chapter 13 Agriculture and Soils** concludes that there would be a permanent removal of 34.4 ha of BMV land as a result of the operation and maintenance of the Project. This includes land for the new-build pylon footings across the route, as well as land required for environmental and ecological mitigation, including areas for veteran tree compensation, mitigation planting, BNG mitigation and flood compensation. While those areas used for mitigation purposes are no longer in agricultural use during the operation of the Project, there may be potential benefits as a result of such changes in terms of soil health and soil function.<br>As set out in **Application Document 6.13 Environmental Statement Chapter 13 Agriculture and Soils** the areas of BMV agricultural land permanently required by the Project only account for 2.27% of all agricultural land within the Order Limits. Therefore, overall it is considered that, while the Project has not been able to avoid the use of BMV agricultural land completely, it is a small percentage of the overall area of agricultural land, and the urgent need for reinforcement of the transmission system to accommodate contracted and predicted generation connections in the area outweighs the use of BMV agricultural land. |

| Policy | Bassetlaw Local Plan Policy Requirement | Project Compliance |
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| | | *Air and water quality; hydrology and hydrogeology; existing highway capacity and highway safety; noise, light, glare, smell, dust, emissions or flicker; recreation and local amenity.*<br><br>No significant adverse effects are reported in the ES in relation to the above receptors.<br>*Aviation and radar*<br><br>Significant effects are reported in relation to three aerodromes, as set out in **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics**, **Recreation and Tourism**. Although the construction of the Project would result in significant adverse impacts on three unlicensed aerodromes, two of these can continue their use, with only one airfield needing to permanently cease operations, as a worst-case scenario. The affected airfields are currently only used for recreational activities and are not used currently for military or defence operations. |
| Policy ST50: Flood Risk and Drainage | 1. Proposals are required to consider and, where necessary, mitigate the impacts of the proposed development on flood risk, on-site and off-site, commensurate with the scale and impact of the development. Proposals, including change of use applications, must be accompanied by a Flood Risk Assessment (where appropriate), which demonstrates that the development, including the access and egress, will be safe for its lifetime, without increasing or exacerbating flood risk elsewhere and where possible will reduce flood risk overall.<br>2. Where relevant, proposals must demonstrate that they pass the Sequential Test and if necessary the Exceptions Test in Flood Zones 2 and 3 and ensure that where land is required to manage flood risk, it is safeguarded from development.<br>River Ryton Flood Management Impact Zone<br>3. All development within the River Ryton Flood Management Impact Zone, as identified on the Policies Map, will need to demonstrate through a Design and Access Statement that they will not prejudice the delivery of a future flood management scheme for the River Ryton catchment through prior agreement with the Environment Agency.<br>Surface Water Flood Risk<br>4. All development where practicable should incorporate sustainable drainage systems (SuDS) in line with national standards. These should:<br>a) be informed by the Lead Local Flood Authority, sewerage company and relevant drainage board;<br>b) have maintenance arrangements in place to ensure an acceptable standard of operation and management for the development's lifetime;<br>c) prevent surface water discharge into the sewerage system;<br>d) maximise environmental gain through: enhancing the green/blue infrastructure network, including urban greening measures, contributing to biodiversity net gain where possible, and, securing amenity benefits along with flood storage volumes;<br>e) seek to reduce runoff rates in areas at risk from surface water flooding, and that any surface water is directed to sustainable outfalls. | A Flood Risk Assessment (**Application Document 7.13**) has been prepared which assesses whether the Project is likely to be at risk of flooding or is likely to increase flood risk elsewhere. The FRA concludes that from the outset of the Project, a sequential approach has been taken to siting infrastructure for the Project, particularly those elements that are vulnerable to inundation, as evidenced in **Application Document 7.17 Strategic Options Report Including Needs Case**.<br>The water environment and flood risk were considered in the early stages of siting and design and embedded measures have been intrinsic to the design of the Project to reduce and where possible avoid flood risks and impacts on the water environment. Embedded mitigation measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments,** which is secured by **Application Document 3.1 Draft Development Consent Order** and include:<br>• Where possible the design of the temporary haul roads has sought to utilise existing bridges and culverts in order to avoid physical disturbance, impacts on flow regimes.<br>• Large or sensitive watercourses, for example those designated as main river, and those with WFD status, will be crossed by the temporary haul road using temporary clear span bridges to avoid in-channel works and associated effects.<br>• Application of appropriate stand-off distances of 10 m have been applied to watercourses to avoid directs effects where practicable.<br>Temporary infrastructure such as construction compounds, lay down areas (as well as areas where impermeable material will be installed or where heavy equipment would be used) and construction access tracks would be drained using sustainable drainage systems (SuDS) techniques that are suitable for local ground conditions and topography and which are designed to accommodate a 1 in 10-year (10% Annual Exceedance Probability) event, plus a 40% allowance for climate change resilience. These areas will be reinstated after completion of the temporary works, as agreed with the landowner. In addition, measures to control and manage construction impacts are set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments** including those detailed in a Flood Warning and Evacuation Plan, and by programming construction activities in floodplains to avoid periods of likely high river levels where practicable.<br>During construction, the FRA concludes that following the application of a sequential approach and a lack of proximate feasible alternatives as detailed in **Application Document 7.17 Strategic Options Report Including Needs Case**, three construction compounds are located in Flood Zone 3, in addition to some temporary haul roads and construction access which must necessarily be located in Flood Zones 2 and 3. The FRA concludes, however, that these risks would be reduced and managed by implementing a range of mitigation measures set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, including those detailed in a Flood Warning and Evacuation Plan, and by programming construction activities in |

| Policy | Bassetlaw Local Plan Policy Requirement | Project Compliance |
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| | | floodplains to avoid periods of likely high river levels where practicable. Following the implementation of these measures, the residual risk is medium for fluvial and tidal flooding, and low for surface water and groundwater. Overall the construction of the Project results in no significant effects in relation to flood risk, as set out in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**.<br>During operation, due to its linear nature and the geographical extent of the Project, while the siting of pylons within the defended floodplain has largely been avoided, some operational Project components, namely pylons, must necessarily be located in Flood Zones 2 and 3 with some areas being within the floodplain.<br>The Exception Test set out in Policy F6 of the NPPF is therefore triggered, and the FRA provides the evidence of how the Project satisfies this test. The FRA concludes that, with regard to the test, the Project is a NSIP that would play an important role in delivering renewable electricity efficiently, reliably and safely and would support the UK's move towards net zero, therefore it would provide wider sustainability benefits to the community that outweigh flood risk.<br>In addition, permanent Project infrastructure which lies within areas at risk of fluvial or tidal flooding only comprises a small number of pylons. These pylons are resilient to flooding, given their concrete bases and metal lattice structures which would not be impacted by floodwaters, and so ensure the Project would be safe and could continue to operate in times of flood. A suite of measures would be adopted, as described in Table 3.1 of **Application Document 7.13 Flood Risk Assessment** and also set out in **Application Document 7.3 Register of Environmental Actions and Commitments** which is secured by **Application Document 3.1 Draft Development Consent Order**, to prevent flood risk increases during operation of the Project.<br>It is therefore concluded that during the operational phase, the Project is considered to be at low risk of flooding from all sources assessed due to the mitigation measures built into its design. The Project is not anticipated to increase flood risk elsewhere during its operation.. New impermeable surfaces would be very localised to pylon bases and rainfall runoff from these areas would be attenuated by surrounding reinstated vegetation and would soak back into the ground.<br>The Exception Test is therefore concluded to be satisfied, as the Project would bring significant benefits via its delivery of safe, reliable, and renewable electricity; would not result in an increase in flood risk elsewhere; and has been designed to be resilient to flooding throughout its lifetime. |
| Policy ST51: Protecting Water Quality and Management | 1. In line with the objectives of the Water Framework Directive, the quantity and quality of surface and groundwater bodies will be protected and where possible enhanced. Development adjacent to, over or in, a main river or ordinary watercourse will be supported where proposals consider opportunities to improve the river environment and water quality where possible by:<br>a) actively contributing to enhancing the status of the waterbody through positive actions or ongoing projects;<br>b) naturalising watercourse channels;<br>c) improving the biodiversity and ecological connectivity of watercourses;<br>d) safeguarding and enlarging river buffers with appropriate habitat in accordance with Policy ST37; and<br>e) mitigating diffuse agricultural and urban pollution.<br>2. Proposals within a Source Protection Zone will need to demonstrate that the Sherwood Sandstone Principal Aquifer and its groundwater resources and groundwater quality will be protected throughout the construction and operational phase of development, by demonstrating the satisfactory resolution of all relevant identified impacts. | The potential for the Project to compromise objectives established under the Water Framework Directive Regulations has been assessed in **Application Document 7.12 Water Framework Directive Assessment**. The assessment confirms no significant effects are anticipated on water quality and resources as a result of the Project.<br>Embedded mitigation measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, which is secured by **Application Document 3.1 Draft Development Consent Order**, and include:<br>• Where possible the design of the temporary haul roads has sought to utilise existing bridges and culverts in order to avoid physical disturbance, impacts on flow regimes and pollution risks.<br>• Large or sensitive watercourses, for example those designated as main river, and those with WFD status, will be crossed by the temporary haul road using temporary clear span bridges to avoid in-channel works and associated effects.<br>• Appropriate stand-off distances of 10 m have been applied to watercourses to avoid direct effects where practicable.<br>Temporary infrastructure such as construction compounds, lay down areas (as well as areas where impermeable material will be installed or where heavy equipment would be used) and construction access tracks would be drained using sustainable drainage systems (SuDS) |

| Policy | Bassetlaw Local Plan Policy Requirement | Project Compliance |
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| | 3. All proposals must ensure that appropriate infrastructure for water supply, sewerage and sewage treatment, is available or can be made available at the right time to meet the needs of the development. Proposals should:<br>a) utilise the following drainage hierarchy:<br>i. into the ground (infiltration);<br>ii. to a surface water body;<br>iii. to a surface water sewer, highway drain, or another drainage system;<br>iv. to a combined sewer.<br>b) ensure that foul and surface water flows are separated with foul water being disposed to a public sewer or to a private self-treatment plant and that the design of the waste disposal system will be safe over the lifetime of the development.<br>c) ensure that development that discharges water into a watercourse incorporates appropriate water pollution control measures;<br>d) ensure that drainage design take into account an appropriate climate change allowance as agreed with the relevant authority(s);<br>e) ensure that infiltration based SuDS incorporate appropriate water pollution control measures;<br>f) consider use of water recycling, rainwater and storm water harvesting, wherever feasible, to reduce demand on mains water supply. | techniques that are suitable for local ground conditions and topography and which are designed to accommodate a 1 in 10-year (10% Annual Exceedance Probability) event, plus a 40% allowance for climate change resilience. These areas will be reinstated after completion of the temporary works, as agreed with the landowner. |

## 2.9 East Riding of Yorkshire and Kingston upon Hull Joint Minerals Local Plan (2019)

Table 2.9 – Signposting for Compliance with the East Riding of Yorkshire and Kingston upon Hull Joint Minerals Local Plan (2019)

| Policy | East Riding of Yorkshire and Kingston upon Hull Joint Minerals Local Plan Policy Requirement | Project Compliance |
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| Policy AGG10: Safeguarding of Mineral Infrastructure and Facilities | A. Existing minerals infrastructure will be safeguarded from non-mineral development, which would adversely impact on the operation and costs associated with the infrastructure, unless it can be demonstrated that:<br>1. Replacement infrastructure provision of an equal or greater capacity and quality will be provided in an alternative location serving the same market(s); or<br>2. Sufficient infrastructure already exists in the area serving the same market(s). B. Non-mineral development, which would adversely impact on the operation of minerals infrastructure will be required to provide suitable mitigation to reduce this impact to acceptable levels.<br>B. Non-mineral development, which would adversely impact on the operation of minerals infrastructure will be required to provide suitable mitigation to reduce this impact to acceptable levels. | National Grid acknowledges that parts of the study area for the Project assessments are located within an MSA, which also extends beyond the study area, across areas of the East Riding of Yorkshire, North Lincolnshire and Nottinghamshire, and that the Order Limits pass through the Wienerberger Ltd clay works.<br>Whist it is acknowledged that some temporary sterilisation of some small areas of minerals resources may occur associated with the Project, these resources could become available in the future. **Application Document 6.12.A3 Environmental Statement Appendix 12.3 Preliminary Qualitative Minerals Resource Assessment** concludes it would not be practical to extract the mineral prior to development.<br>The Project is considered to be of national significance, and therefore the need for the Project outweighs the need to safeguard the mineral deposit. Based on the national significance of the Project and that all affected authorities have more than the seven-year land bank of sand and gravel, as required by the NPPF, and sufficient additional safeguarded areas, it is considered that the potential impact of sterilising the small volume associated with the Project is acceptable without further consideration or mitigation. |

## 2.10 Nottinghamshire Minerals Local Plan

Table 2.10 – Signposting for Compliance with Nottinghamshire Minerals Local Plan (N-MLP) (2021)

| Policy | Nottinghamshire Minerals Local Plan Policy Requirement | Project Compliance |
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| Policy SP7: Minerals Safeguarding, Consultation Areas and Associated Minerals Infrastructure | Minerals Safeguarding Areas<br>1. Locally and nationally important mineral resources, permitted reserves, allocated sites and associated minerals infrastructure will be safeguarded from needless sterilisation by non-minerals development through the designation of minerals safeguarding areas as identified on the Policies Map.<br>2. Non-minerals development within minerals safeguarding areas will have to demonstrate that mineral resources will not be needlessly sterilised as a result of the development and that the development would not pose a serious hindrance to future extraction in the vicinity.<br>3. Where this cannot be demonstrated, and where there is a clear and demonstrable need for the non-minerals development, prior extraction will be sought where practicable.<br>Minerals Consultation Areas<br>1. District and Borough Councils within Nottinghamshire will consult the County Council as Minerals Planning Authority on proposals for nonminerals development within the designated Mineral Consultation Area, as shown on the Policies Map.<br>2. The Minerals Planning Authority will resist inappropriate non-minerals development within the Minerals Consultation Areas.<br>3. Where non-minerals development would cause an unacceptable impact on the development, operation or restoration of a permitted minerals site, mineral allocation, or associated minerals infrastructure, suitable mitigation should be provided by the applicant prior to the completion of the development. | National Grid acknowledges that parts of the study area for the Project assessments are located within an MSA, which also extends beyond the study area, across areas of the East Riding of Yorkshire, North Lincolnshire and Nottinghamshire, and that the Order Limits pass through the Wienerberger Ltd clay works.<br>Whist it is acknowledged that some temporary sterilisation of some small areas of minerals resources may occur associated with the Project, these resources could become available in the future. **Application Document 6.12.A3 Environmental Statement Appendix 12.3 Preliminary Qualitative Minerals Resource Assessment** concludes it would not be practical to extract the mineral prior to development.<br>The Project is considered to be of national significance, and therefore the need for the Project outweighs the need to safeguard the mineral deposit. Based on the national significance of the Project and that all affected authorities have more than the seven-year land bank of sand and gravel, as required by the NPPF, and sufficient additional safeguarded areas, it is considered that the potential impact of sterilising the small volume associated with the Project is acceptable without further consideration or mitigation. |

## 2.11 Nottinghamshire and Nottingham Waste Local Plan (2025)

Table 2.11 – Signposting for Compliance with the Nottinghamshire and Nottingham Waste Local Plan (2025)

| Policy | Nottinghamshire and Nottingham Waste Local Plan Policy Requirement | Project Compliance |
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| Policy SP1: Waste Prevention and re-use | All new development should be designed, constructed, and operated to minimise the creation of waste, maximise the use of recycled materials, and assist with the collection, separation, sorting, recycling and recovery of waste arising from the development during its use. | **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project** sets out the approach taken on the Project to materials and waste. The nature of the Project means that it is difficult to use secondary (reused/recycled) sources during its construction, as this can affect the operation and the design life of the Project. However, National Grid has existing processes in place to obtain materials from sustainable sources and to use recycled materials where these do not compromise the required design standards and operational life of the Project.<br>Temporary materials, such as aggregate for access routes and site compounds, works cabins, and security fencing, would be required during construction. Where practicable, temporary materials would be sourced from other construction projects within the region and reused at other construction projects after completion of the Project.<br>**Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.2 Outline Code of Construction Practice** set out that a SWMP will be developed prior to construction. The SWMP will include but not be limited to:<br>• Waste forecasts; |

| Policy | Nottinghamshire and Nottingham Waste Local Plan Policy Requirement | Project Compliance |
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| | | • How waste will be reduced, re-used, managed and disposed of in accordance with the waste hierarchy;<br>• Identification of recovery routes; and<br>• Actual waste figures once work has begun.<br>Consideration will be given to the guidance in The Definition of Waste: Development Industry Code of Practice (DoWCoP). Dedicated waste management areas will be designed to sufficiently accommodate the types and volumes of waste produced and to reduce the environmental risk of storing waste on-site (covered, secured and away from drainage).<br>As set out in **Application Document 7.3 Register of Environmental Actions and Commitments**, all use and storage of chemicals and fuels is to be undertaken in accordance with Environment Agency guidance and The Control of Pollution (Oil Storage) (England) Regulations 2001 (HM Government, 2001). The use and storage of chemicals and fuels will also be controlled and monitored under the detailed Code of Construction Practice which will include, for example, procedures for good general construction site practices, environmental and waste management procedures, regular vehicle checks, use of spill kits, correct waste storage and disposal, use of oil-water separators as necessary (for example, for drainage from refuelling areas), collection of process water from the washout/cleaning of ready-mix concrete vehicles and equipment for treatment/disposal. |
| Policy SP8: Safeguarding Waste Management Sites | 1. Nottinghamshire and Nottingham City will seek to avoid the loss of existing authorised waste management facilities, including potential extensions; sites which have an unimplemented planning permission; and facilities to transport waste, such as rail or water.<br>2. Proposals, including both planning applications and allocations in local plans, for non-waste uses near existing or permitted waste management facilities will need to provide suitable mitigation before the development is completed to address significant adverse impacts and demonstrate that the waste management uses can operate without unreasonable restrictions being placed upon them.<br>3. Where proposed non-waste development would have an unacceptable impact on a waste management facility, the applicant will need to demonstrate that there are wider social and/or economic benefits that outweigh the retention of the site or infrastructure for waste use and either:<br>a) The equivalent, suitable and appropriate capacity will be provided elsewhere prior to the nonwaste development; or<br>b) The waste capacity and/ or safeguarded site is no longer required<br>Where proposals are within the Cordon Sanitaire of a wastewater treatment facility, the applicant will need to discuss the proposal with the water company which operates the site and demonstrate that they have no objections which cannot be appropriately mitigated. | The Project would not jeopardise or result in the loss of any existing authorised waste management facilities. |

## 2.12 Cottingham Neighbourhood Plan (2018)

Table 2.12 – Signposting for Compliance with the Cottingham Neighbourhood Plan C-NP (2018)

| Policy | Cottingham Neighbourhood Plan Policy Requirement | Project Compliance |
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| Policy GP2: Design Quality | All new development proposals should have regard to the Design Guide contained within the Neighbourhood Plan, taking full account of the historic character of the Cottingham Conservation Area and other heritage assets within the Neighbourhood Plan area | The location and design of the Project is the result of a comprehensive site selection process that was led by the consideration of good design and key environmental and planning constraints to avoid and minimise impacts as early as possible. **Application Document 5.10 Design Development Report** explains where design choices have sought to reduce the environmental effects of the Project and demonstrates that the design has incorporated embedded mitigation to avoid or reduce significant environmental effects where practicable.<br>The Project avoids Cottingham Conservation Area, and there is no development proposed within the historic core of the settlement.<br>The design guide within the Plan provides guidance for development taking place within the 'Open Space/ Rural area' surround the village, and part of the construction access for the Proposed Development is situated within this area. The design guidance is principally focussed at providing guidance for residential or commercial development, and is not infrastructure focussed. However, the guidance relating to drainage and the need to increase infiltration is noted. **Application Document 7.3 Register of Environmental Actions and Commitments**, which is secured by **Application Document 3.1 Draft Development Consent Order** sets out that temporary infrastructure such as construction compounds, lay down areas (as well as areas where impermeable material will be installed or where heavy equipment would be used) and construction access tracks would be drained using sustainable drainage systems (SuDS) techniques that are suitable for local ground conditions and topography and which are designed to accommodate a 1 in 10-year (10% Annual Exceedance Probability) event, plus a 40% allowance for climate change resilience. These areas will be reinstated after completion of the temporary works, as agreed with the landowner. The design and proposals for SuDS will be confirmed during the detailed design phase of the Project. |
| Policy GP3: Sustainable Drainage | All new development should be designed to incorporate suitable measures to ensure that surface water is managed in such a way as not to exacerbate, and where possible reduce, existing flooding problems either on the site or elsewhere in the Neighbourhood Plan area | Application Document 7.3 Register of Environmental Actions and Commitments, which is secured by Application Document 3.1 Draft Development Consent Order sets out that temporary infrastructure such as construction compounds, lay down areas (as well as areas where impermeable material will be installed or where heavy equipment would be used) and construction access tracks would be drained using sustainable drainage systems (SuDS) techniques that are suitable for local ground conditions and topography and which are designed to accommodate a 1 in 10-year (10% Annual Exceedance Probability) event, plus a 40% allowance for climate change resilience. These areas will be reinstated after completion of the temporary works, as agreed with the landowner. The design and proposals for SuDS will be confirmed during the detailed design phase of the Project.<br>In addition, following consultation with the Environment Agency, it was stipulated that compensatory storage for pylons within the floodplain would be required. Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 Flood Risk Assessment** sets out the proposed location of floodplain storage compensation areas that are proposed on land outside of the floodplain. The flood storage compensation proposals outlined in Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 Flood Risk Assessment** provide evidence that the Project, on the implementation of flood compensation areas within the same floodplain cell, will not increase the overall water level and therefore does not increase flood risk elsewhere. Furthermore, a conservative approach to calculating floodplain storages losses was taken, meaning the suggested volume for compensation areas likely exceeds the requirement. As such, there is the opportunity for the Project to reduce flood risk overall via these floodplain storage compensation areas. |

| Policy | Cottingham Neighbourhood Plan Policy Requirement | Project Compliance |
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| Policy GP5B: Biodiversity and the Green Network | Development proposals which safeguard and, where possible, enhance biodiversity and wildlife opportunities will be supported. | The Project's aim is to retain existing vegetation wherever practicable in accordance with **Application Document 7.3 Register of Environmental Actions and Commitments**. Where reasonably practicable, construction elements (such as working areas, accesses, laydown and temporary construction compounds) will be kept to the minimum required and micro-sited to avoid impacts on ecologically important features. Overseen and informed by the ECoW and ArbCoW, sensitive habitats will be demarcated to ensure contractors protect as much vegetation as possible.<br><br>As a general principle, all land which is temporarily impacted by the Project will be reinstated where practicable to its pre-construction condition land use. In addition to the reinstated habitats across the route, there will also be 'mitigation planting areas' located in key locations through the Project. The locations of these areas are detailed within **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design** and Table 8.2 of **Application Document 7.8 Outline Landscape Ecological Management Plan** sets out a list of the mitigation planting areas proposed within the Order limits.<br><br>The habitats to be created and/or enhanced in these areas (on-site mitigation) have been designed to provide landscape and visual mitigation while also offering ecological value. Along the proposed overhead line, 60 landscape mitigation planting areas have been identified within the Order Limits to provide landscape and visual mitigation, whilst also delivering ecological benefits. Indicative landscape proposals for each of these areas are shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.<br><br>National Grid has committed to deliver at least 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project will achieve a minimum of 10% Biodiversity Net Gain (BNG) (though onsite and offsite BNG) and has undertaken a BNG assessment (based on Natural England's Statutory Biodiversity Metric 2024 version (as of June 2025)) which is presented in **Application Document 7.1 Biodiversity Net Gain Report**.<br><br>Following the implementation of embedded, control and additional mitigation measures, **Application Document 6.8 Environmental Statement Chapter 8 Ecology** and **Application Document 6.9 Environmental Statement Chapter 9 Ornithology** conclude that the Project, based on the current design as set out in **Application Document 6.4 Environmental Statement Chapter 4 Description of the Project**, avoids residual significant adverse impacts on all international and national and local statutory designated sites for nature conservation including SSSIs, non-statutory designated sites, priority habitats, important hedgerows and other terrestrial habitats.. This has been achieved by following the mitigation hierarchy with the design process, and in accordance with the Holford Guidance, to avoid impacts where possible.<br><br>It should be noted that this conclusion is based on the assessment surveys that have been undertaken thus far for the Project. Additional 2026 surveys are currently continuing, and any additional assessment results would be provided in addendum reports following submission of the DCO.<br><br>**Application Document 6.8 Environmental Statement Chapter 8 Ecology** concludes that there would be a residual significant adverse effect on Yellow birds-nest, which is a wildflower, due to the permanent loss of plants due to pylon working areas (pylons 4ZQ78 and 4ZQ77), access, stringing works, and overhead line clearance (between 4ZQ78 and 4ZQ76) requiring felling and management of trees within woodland at or in the vicinity of the top of Bilks Hill, and therefore the associated fungal network that the plant is dependent on. As noted above and in Table 8.21 of Application Document 6.8 Environmental Statement Chapter 8 Ecology, mitigation is proposed to ensure there would be no direct effects or encroachment on yellow bird's nest, however residual significant effects remain due to impacts to the fungal network that the flower relies on. The overriding public benefits and need for the Project are considered to outweigh this harm. There would be no other significant adverse effects on any other species or protected species, including all bird species.<br><br>It is also noted that if the LoD are used during construction near Jillywood Lane LWS, then habitats could be impacted in two locations. This would result in a significant adverse effect because the LWS has been recorded by the Project as containing Woodland with Characteristics of Ancient Woodland. |

| Policy | Cottingham Neighbourhood Plan Policy Requirement | Project Compliance |
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| | | Therefore, as a worst case, this habitat is considered irreplaceable. If the LoD is used, and trees are required to be removed at Jillywood Lane LWS, mitigation set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments** would ensure that any trees removed will not be removed to below ground level and not grubbed out to reduce the impact to soil and ground flora. Compensation would also be provided via new trees to be planted in proposed mitigation planting areas, outside the LWS, which are described in Application Document 7.8 Outline Landscape and Ecology Management Plan and shown in **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.<br><br>A significant residual adverse effect is also anticipated on Socken Wood and Wood Farm Woodlands with Characteristics of Ancient Woodland. Additionally, if the LoD are used in one area, a significant residual effect is anticipated on one veteran tree.<br><br>National Grid considers that it has applied the mitigation hierarchy appropriately in designing the Project to avoid or reduce as far as possible, adverse effects on irreplaceable habitats. The location, routeing and siting of the Project has been designed to avoid and/or reduce impacts on designated ancient woodland and veteran trees as far as practicable.<br><br>It is acknowledged that significant effects are reported on some areas of Woodlands with Characteristics of Ancient Woodland, which would result in the loss or deterioration of irreplaceable habitats at Socken Wood and Wood Farm. Mitigation is secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments** to ensure that impacts are reduced as far as practicable, and compensation planting with a ratio of 3:1 is proposed and is secured in **Application Document 7.8 Outline Landscape and Ecology Management Plan**.<br><br>As the design currently stands and should the LoD not be used in Route Section A, the Project would not result in the loss or deterioration of any designated (on the AWI) ancient woodland or trees, or veteran trees. In the event that the LoD is used and the loss of one veteran tree is required, compensation planting (with a replanting ratio of 30:1) would be implemented as secured in **Application Document 7.3 Register of Environmental Actions and Commitments** and agreed with Natural England and East Riding of Yorkshire Council.<br><br>Mitigation and compensation planting (ratio of 3:1) is also proposed if the Project would result in the loss or deterioration of Woodland with Characteristics of Ancient Woodland within Jillywood Lane LWS (if the LoD are used in this location). These are secured within **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br><br>Therefore, in accordance with paragraph 5.4.55 of NPS EN-1 (Department for Energy Security and Net Zero, 2025) it is considered that the overriding public need and benefit of the Project (as set out in sections 3 and 7.5 of the **Application Document 5.5 Planning Statement**) would clearly outweigh the loss or deterioration of the habitat, and it would therefore be wholly exceptional. In addition, a relevant compensation strategy is provided within the Order Limits for potential impacts as far as possible and is secured within Application Document 7.8 Outline Landscape and Ecology Management Plan and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br><br>In addition, National Grid has committed to deliver at least 10% BNG with wider environmental and societal benefits. The Project will achieve a minimum of 10% BNG (through on-site and off-site BNG) and has undertaken a BNG assessment (based on Natural England's Statutory Biodiversity Metric 2024 version (as of June 2025)) which is presented in **Application Document 7.1 Biodiversity Net Gain Report**.<br><br>The Project does not comprise recreational development therefore there would be no impacts relating to this. |

| Policy | Cottingham Neighbourhood Plan Policy Requirement | Project Compliance |
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| | | The Appropriate Assessment in the HRA Report concludes that the Project (either alone or in-combination with other plans or projects) would not result in an adverse effect on the integrity of a European site following the implementation of mitigation. Embedded, control and management and additional mitigation measures that are proposed to minimise or avoid likely significant effects are set out in the HRA Report, as well as where relevant in **Application Document 7.3 Register of Environmental Actions and Commitments, Application Document 7.2 Outline Code of Construction Practice, Application Document 7.8 Outline Landscape and Ecology Management Plan, Application Document 7.5 Outline Soil Management Plan, Application Document 7.7 Outline Noise and Vibration Management Plan**, and these documents will be secured by **Application Document 3.1 Draft Development Consent Order** |
| Policy GP8: Protecting Open Areas between Cottingham and Hull from Inappropriate Development | Open land between Cottingham and Hull, Anlaby, Willerby and Kirk-Ella will be protected from future development other than for uses of an open nature or where it is essential for local infrastructure purposes and where existing uses are already established. | The Proposed Development is not sited in the areas listed. |

## 2.13 Clarborough and Welham Neighbourhood Plan (2017)

Table 2.13 – Signposting for Compliance with then Clarborough and Welham Neighbourhood Plan (2017)

| Policy | Clarborough and Welham Neighbourhood Policy Requirement | Project Compliance |
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| Policy 5: Reducing the Risk of Flooding | 1. Development, which is consistent with other development plan Policies within Clarborough and Welham, will be supported where it can be demonstrated that the scheme will not have a detrimental impact on surface water run-off and sewage discharge networks in the village.<br>2. Development in flood sensitive areas and those which feed into flood sensitive areas will be designed and constructed to prevent any increase in the level of flood risk on the site.<br>3. The development proposed should be self-sufficient through the incorporation of Sustainable Urban Drainage Systems.<br>4. Development will only be permitted where it does not result in the loss of an open watercourse.<br>5. Development which utilises permeable surfacing will be encouraged. | **Application Document 7.13 Flood Risk Assessment** has been prepared which assesses whether the Project is likely to be at risk of flooding or is likely to increase flood risk elsewhere. The FRA concludes that from the outset of the Project, a sequential approach has been taken to siting infrastructure for the Project, particularly those elements that are vulnerable to inundation, as evidenced in **Application Document 7.17 Strategic Options Report Including Needs Case**.<br>The water environment and flood risk were considered in the early stages of siting and design and embedded measures have been intrinsic to the design of the Project to reduce and where possible avoid flood risks and impacts on the water environment. Embedded mitigation measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments,** which is secured by **Application Document 3.1 Draft Development Consent Order** and include:<br>• Where possible the design of the temporary haul roads has sought to utilise existing bridges and culverts in order to avoid physical disturbance, impacts on flow regimes.<br>• Large or sensitive watercourses, for example those designated as main river, and those with WFD status, will be crossed by the construction access traffic using temporary clear span bridges to avoid in- channel works and associated effects.<br>• Application of appropriate stand-off distances of 10 m have been applied to watercourses to avoid directs effects where practicable.<br>Temporary infrastructure such as construction compounds, lay down areas (as well as areas where impermeable material will be installed or where heavy equipment would be used) and construction access tracks would be drained using sustainable drainage systems (SuDS) techniques that are suitable for local ground conditions and topography and which are designed to accommodate a 1 in 10-year (10% Annual Exceedance Probability) event, plus a 40% allowance for climate change resilience. These areas will be reinstated after completion of the temporary works, as agreed with |

| Policy | Clarborough and Welham Neighbourhood Policy Requirement | Project Compliance |
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| | | the landowner. During construction, the FRA concludes that following the application of a sequential approach and a lack of proximate feasible alternatives as detailed in **Application Document 7.17 Strategic Options Report Including Needs Case**, three construction compounds are located in Flood Zone 3, in addition to some temporary haul roads and construction access which must necessarily be located in Flood Zones 2 and 3. The FRA concludes, however, that these risks would be reduced and managed by implementing a range of mitigation measures set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, including those detailed in a Flood Warning and Evacuation Plan, and by programming construction activities in floodplains to avoid periods of likely high river levels where practicable. Following the implementation of these measures, the residual risk is medium for fluvial and tidal flooding, and low for surface water and groundwater. Overall the construction of the Project results in no significant effects in relation to flood risk, as set out in **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**.<br><br>The Project does not result in the loss of an open watercourse.<br><br>During operation, due to its linear nature and the geographical extent of the Project, while the siting of pylons within the defended floodplain has largely been avoided, some operational Project components, namely pylons, must necessarily be located in Flood Zones 2 and 3 with some areas being within the floodplain.<br><br>Following consultation with the Environment Agency in accordance with paragraph 5.8.18 to 5.8.20 of NPS EN-1, it was stipulated that compensatory storage for pylons within the floodplain would be required. Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 Flood Risk Assessment** sets out the proposed location of floodplain storage compensation areas that are proposed on land outside of the floodplain. The flood storage compensation proposals outlined in Appendix A Flood Compensation Storage Technical Note of **Application Document 7.13 Flood Risk Assessment** provide evidence that the Project, on the implementation of flood compensation areas within the same floodplain cell, will not increase the overall water level and therefore does not increase flood risk elsewhere. Furthermore, a conservative approach to calculating floodplain storages losses was taken, meaning the suggested volume for compensation areas likely exceeds the requirement. As such, there is the opportunity for the Project to reduce flood risk overall via these floodplain storage compensation areas.<br><br>It is therefore concluded that during the operational phase, the Project is considered to be at low risk of flooding from all sources assessed due to the mitigation measures built into its design. The Project is not anticipated to increase flood risk elsewhere during its operation as any losses of floodplain storage would be compensated for. New impermeable surfaces would be very localised to pylon bases and rainfall runoff from these areas would be attenuated by surrounding reinstated vegetation and would soak back into the ground. |
| Policy 6: Improve Green Infrastructure and the Natural Environment | 1. All development outside the development boundary which is directly related to improving or extending cycling, walking or bridleways will be permitted where the proposals:<br>a) do not detract from the landscape character or ecological value as defined in the most recent Landscape Character Assessment Study; and<br>b) are for enhancing, understanding or protecting the biodiversity; and<br>c) for improving access to the local wildlife sites as identified on Map 11, page 61; and<br>d) are consistent with other development plan Policies.<br>2. Proposals that create cycling and walking routes to Clarborough Tunnel and the Chesterfield Canal SSSI will be particularly encouraged. | The Project's aim is to retain existing vegetation wherever practicable in accordance with **Application Document 7.3 Register of Environmental Actions and Commitments**. Where reasonably practicable, construction elements (such as working areas, accesses, laydown and temporary construction compounds) will be kept to the minimum required and micro-sited to avoid impacts on ecologically important features. Overseen and informed by the ECoW and ArbCoW, sensitive habitats will be demarcated to ensure contractors protect as much vegetation as possible.<br><br>As a general principle, all land which is temporarily impacted by the Project will be reinstated where practicable to its pre-construction condition land use. In addition to the reinstated habitats across the route, there will also be 'mitigation planting areas' located in key locations through the Project. The locations of these areas are detailed within **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design** and Table 8.2 of **Application Document 7.8 Outline Landscape Ecological Management Plan** sets out a list of the mitigation planting areas proposed within the Order limits. |

| Policy | Clarborough and Welham Neighbourhood Policy Requirement | Project Compliance |
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| | 3. Where applicable, development proposals will be expected to demonstrate how they protect and enhance existing green infrastructure assets affected by the development and show the opportunities taken to improve linkages both to existing and new green infrastructure assets and to residential areas. | The habitats to be created and/or enhanced in these areas (on-site mitigation) have been designed to provide landscape and visual mitigation while also offering ecological value. Along the proposed overhead line, 60 landscape mitigation planting areas have been identified within the Order Limits to provide landscape and visual mitigation, whilst also delivering ecological benefits. Indicative landscape proposals for each of these areas are shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**.<br>National Grid has committed to deliver at least 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project will achieve a minimum of 10% Biodiversity Net Gain (BNG) (though onsite and offsite BNG) and has undertaken a BNG assessment (based on Natural England's Statutory Biodiversity Metric 2024 version (as of June 2025)) which is presented in **Application Document 7.1 Biodiversity Net Gain Report**. |

## 2.14 Headon, Upton, Grove and Stokeham Neighbourhood Plan (2018)

Table 2.14 – Signposting for Compliance with the Headon, Upton, Grove and Stokeham Neighbourhood Plan (2018)

| Policy | Headon, Upton, Grove and Stokeham Neighbourhood Plan Policy Requirement | Project Compliance |
|---|---|---|
| Policy 2: Local Design Principles | 1. Based on the commentary set out within the HUGS Neighbourhood Plan Character Assessment (A full copy of the Character Assessment can be found in Appendix 1), proposals must consider, when proposing development within the HUGS area, how they have met the following principles:<br>a) Development proposals for the extension of existing buildings should be of a size and scale that complements the existing building and enhances the character of the immediate area.<br>b) Any mature roadside trees and boundary hedgerows, that are considered an important character of the villages and identified within the Character Assessment (Appendix 1), should be retained.<br>c) Where metal or wooden cladded buildings are proposed, these should, where possible, incorporate a degree of boundary planting to soften their appearance. The colour of external materials on these buildings should be chosen that help blend the buildings into the wider landscape and avoid any negative impact on local character.<br>d) New development proposals should seek to draw inspiration from local vernacular architecture, including building height, scale, massing and materials appropriate to its location and setting. Proposals for the conversion of existing agricultural buildings should retain as much of their external appearance to reduce any significant harm to either the building or local character.<br>e) Existing buildings of recognised heritage value, as identified in Appendix 2, should be protected from inappropriate development. New development should take care to ensure that the setting of such heritage assets is not compromised, and where possible, efforts should be made to enhance and relate positively to the heritage asset and its setting.<br>f) ''Important views'', identified within the Character Assessment, should be preserved and, where possible, enhanced.<br>g) Proposals Incorporating carbon reduction and energy efficient materials, such as solar panels, must avoid any unnecessary negative impact on the amenity value of the building and the character of the wider area. | As set out in **Application Document 5.10 Design Development Report** the Project delivers good design by avoiding or reducing impacts on environmentally sensitive receptors as far as practicable through routeing and siting, and making efficient use of land by maximising close parallel routeing with existing electricity transmission infrastructure where reasonably practicable.<br>The Project has taken account of the existing built heritage from the earliest stages in the design process as set out in **Application Document 7.17 Strategic Options Report and Application Document 7.18 Corridor and Preliminary Routeing and Siting Study**, as well as **Application Document 5.10 Design Development Report**. The Project has undergone an iterative design process, following the mitigation hierarchy in seeking to protect and conserve heritage assets where practicable. The route has been sited and designed to minimise environmental impacts and impacts to heritage assets where possible.<br>Vegetation will be retained where practicable. Where vegetation is lost and trees cannot be replaced in situ due to the restrictions associated with operational safety, replacement vegetation will be planted as close by as practicable and will complement the landscape character and be sympathetic to the local habitat type in order to provide a high biodiversity value.<br>The Plan identifies sensitive views east of Headon towards Lincoln Cathedral, and highlighting the relationship between the Church and the Cathedral. The overhead lines and pylons corridor associated with the Project runs north/ south through the area within this viewpoint. Although the precise location of the viewpoint identified is unclear within the Neighbourhood Plan, it is anticipated a similar viewpoints is assessed within Appendix 6A Viewpoint Assessment – at VP E-35, on Brigg Lane. The assessment acknowledges that the sensitivity of this view is '*High - The view contributes to the visual amenity enjoyed by residents including users of the byway.'*. The assessment concludes that '*The introduction of new pylons in the view would continue to result in an adverse change and therefore, the small magnitude of change described for Year 1 would continue to be experienced by receptors.*' |

| Policy | Headon, Upton, Grove and Stokeham Neighbourhood Plan Policy Requirement | Project Compliance |
|---|---|---|
| | h) Developments shall take inspiration from the existing predominant boundary treatments appropriate to the immediate buildings and wider character of that part of the individual village. | |
| Policy 3: Landscape Character | 1. All new proposals should seek to preserve, and where possible, enhance the existing, environmental assets as identified on Map 10. Where opportunities exist, proposals should seek to restore underused, or poorly maintained, assets, whilst retaining their amenity value.<br>2. Important views and vistas across the landscape, as identified in the character assessment, should be preserved. Any new development must demonstrate that they are not blocking these views and their associated amenity value. | **Application Document 6.8 Environmental Statement Chapter 8 Ecology** sets out the effects on habitats, including the sites identified as environmental assets on Map 10. The chapter provides information on how the Project has taken advantage of opportunities to conserve and enhance biodiversity, in line with the requirements of the planning policy. Map 10 identifies Treswell Woods SSSI, which is adjacent to the Project, as an environmental asset. No development within this Site is proposed. Effects on Treswell Wood SSSI due to indirect dust and water pollution impacts are presented in section 8.9 of this chapter.<br>The Plan identifies sensitive views east of Headon towards Lincoln Cathedral, and highlighting the relationship between the Church and the Cathedral. The overhead lines and pylons corridor associated with the Project runs north/ south through the area within this viewpoint. Although the precise location of the viewpoint identified is unclear within the Neighbourhood Plan, it is anticipated a similar viewpoint is assessed within Appendix 6A Viewpoint Assessment – at VP E-35, on Brigg Lane. The assessment acknowledges that the sensitivity of this view is '*High - The view contributes to the visual amenity enjoyed by residents including users of the byway.'.* The assessment concludes that '*The introduction of new pylons in the view would continue to result in an adverse change and therefore, the small magnitude of change described for Year 1 would continue to be experienced by receptors.*' |
| Policy 6: Dark Skies | 1. Any lighting scheme, domestic or commercial, that would normally require planning permission (e.g. floodlighting would not be supported unless it can be demonstrated that:<br>a) The lighting scheme is unavoidable to ensure viability of the development and that the benefits significantly and demonstrably outweigh the negative impact, including impact on nocturnal wildlife; and<br>b) The operating hours of such light impact, that should demonstrably be reduced to the minimum necessary; and<br>c) all available and feasible mitigation solutions have been implemented, to reduce to a minimum light pollution and the loss of visual amenity occupiers of nearby premises or users of the nearby countryside may reasonably expect to enjoy. | An assessment of artificial light emissions has been undertaken to determine where the Project may have adverse effects on local amenity and human receptors. The proposed temporary lighting requirements for the Project are described in **Application Document 6.4 Chapter 4 Project Description** and subject to assessment in **Application Document 6.8 Chapter 8 Ecology and Biodiversity** and **Application Document 6.13 Chapter 13 Landscape and Visual**.<br>Exterior and interior lighting would be provided at construction sites and compounds to allow for safe movement and the operation of equipment. All lighting would be designed in accordance with the appropriate design standards and be motion-sensor activated. A typical construction day would consist of 12 hours, which in winter would require working in the dark at either end of the day. For the purposes of the ES, it is therefore assumed that winter working would require lighting at certain sites, but this would not apply Project-wide. Following the implementation of these proposed standard mitigation measures, the temporary residual effects of construction lighting are not anticipated to be significant. |
| Policy 8: Enhancing our Public Rights of Way | 1. All development which is related to improving, extending or creating new public rights of way, as identified on Map 17, will be permitted where the proposals meet the following criteria:<br>a) do not detract from the landscape character or areas of identified ecological value, as defined in the most recent Character Assessment (See Appendix 1); and<br>b) provide a safe and suitable connection and enhancing the enjoyment of public amenity.<br>c) provide new connections, including cycleways and bridleways, to the existing network between the villages and nearby settlements. | **Application Document 6.17 Environmental Statement Chapter 17 Socio-economics, Recreation and Tourism and Application Document 14 Environmental Statement Chapter 14 Traffic and Transport** anticipates that, following the implementation of embedded and control measures, there would be no permanent PRoW closures or diversions as a result of the Project. The Project's construction period would result in temporary closures and diversions, however the majority of these would have a negligible impact, be in place for a short period, or offer similar character and amenity, and therefore will have comparable recreational value and no significant adverse impacts are reported as a result of these diversions. |

## 2.15 Rampton and Woodbeck Neighbourhood Plan (2021)

Table 2.15 – Signposting for Compliance with the Rampton and Woodbeck Neighbourhood Plan (2021)

| Policy | Rampton and Woodbeck Neighbourhood Plan - Policy Requirement | Project Compliance |
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| Policy 5: Development Principles | 1. New developments, including the extension to and alteration of existing buildings, should create places of distinct character based upon an appreciation of the site and its surrounding area by responding positively to its natural and built context. Development proposals should be designed to take account of the following development principles insofar as they relate to the scale, nature and location of the development in the neighbourhood area:<br>a) development should take inspiration from the identified key characteristics and features as identified within the Rampton and Woodbeck Character Assessment;<br>b) development should be designed to safeguard ‘’views in both Rampton and Woodbeck’’ that contribute to the character and appearance of the area. These views include (but not limited to) the views, as identified on Maps 6 and 7, and applications shall include an assessment of the impact of the proposal on the positive qualities of such view(s), explaining the rationale of design choices used;<br>c) development should respect existing plot boundaries, ratios, orientation and the historic or traditional forms and grain of development within its character area;<br>d) development should respect the predominant materials used in the area;<br>e) architectural design should reflect high quality standards and, where possible, reflect local design references in both the natural and built environment and reflect and reinforce local distinctiveness;<br>f) the height of new buildings should be in-keeping with the height of neighbouring properties and demonstrate how heights of the development will not be over-bearing or dominant in the existing street-scene;<br>g) existing private gardens in Woodbeck, should be protected from unsympathetic development where this would have an adverse impact on the spacious character of the existing properties within the settlement; and<br>h) the development respects the character of the historic and distinct walling as identified on Map 6. | The Project is located west of Woodbeck, but entirely outside the Rampton and Woodbeck Parish boundary.<br>The two Key Views identified on Map 7 of the Neighbourhood Plan for Woodbeck are directed towards the east, away from the Project. Siting the proposed 400 kV overhead line to the west ensures that the primary visual outlooks and scenic orientations formally safeguarded by the Plan will not experience direct visual intrusion from the scheme.<br>Potential landscape and visual effects on the wider rural landscape and communities have been assessed in **Application Document 6.6 Environmental Statement Chapter 6 Landscape)** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**. While the Plan's protected views face east, Chapter 7 assesses representative viewpoints to the west to ensure a robust evaluation of potential visual change:<br>• VP E-28: Assesses views looking west from Rampton.<br>• VP E-29: Assesses views looking west from Woodbeck (i.e. views not identified as Key Views within the Plan).<br>As reported in Table 7.8 of Chapter 7, the visual baseline establishes that people living and moving around the community of Rampton and Woodbeck possess a medium value of views and high susceptibility to change. During construction, the magnitude of visual change is assessed as small, resulting in a minor adverse (not significant) effect.<br>During operation at Year 1 and Year 15, the magnitude of change across the parish is assessed as medium, leading to a residual moderate adverse (significant) effect across the wider community as new pylons appear in westerly vistas across the agricultural landscape.<br>The design and routeing of the Project have adhered to the mitigation hierarchy and the Holford guidance to minimise visual impact, avoiding physical encroachment into the settlements and maintaining significant separation from residential areas. Furthermore, hedgerow and landscape mitigation measures set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and secured via **Application Document 7.3 Register of Environmental Actions and Commitments** and Requirements of **Application Document 3.1 Draft Development Consent Order** will help integrate the scheme and filter views over time. |
| Policy 6: Heritage Assets in Rampton and Woodbeck | 1. Development will be supported where it conserves or enhances the significance of designated and non-designated heritage assets and their setting, through high quality and sensitive design, taking into consideration appropriate scale, siting and materials. | The Project is located west of Woodbeck, entirely outside the Rampton and Woodbeck Parish boundary, thereby avoiding any direct physical impact, ground disturbance, or loss of historic fabric associated with heritage assets within the parish.<br>Potential indirect impacts arising from changes to setting have been evaluated in **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** and **Application Document 6.10.A2 Environmental Statement Appendix 10.2 Cultural Heritage Baseline Report**, with specific regard to the following assets within the parish:<br>• Rampton Hospital: The complex (including associated historic built elements and local non-designated heritage interest) is situated east of Woodbeck. The hospital's secure and self-contained institutional setting is defined primarily by its internal layout, boundary treatments, and immediate estate grounds. Given the separation distance to the proposed overhead line to the west, existing intervening vegetation, and the presence of Woodbeck settlement, the Project will not unacceptably intrude upon the appreciation or functional setting of the hospital complex, resulting in a negligible effect (not significant).<br>In accordance with NPS EN-1 (Section 5.9) and the NPPF, the Project avoids substantial harm to heritage assets within Rampton and Woodbeck. As set out in **Application Document 5.5 Planning** |

| Policy | Rampton and Woodbeck Neighbourhood Plan - Policy Requirement | Project Compliance |
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| | | **Statement**, any limited, less than substantial harm to setting is clearly outweighed by the urgent national need for Critical National Priority electricity transmission infrastructure. |
| Policy 10: The Protection of the Parish Landscape | 1. Insofar as they relate to the scale, nature and the location of the proposed development, proposals for new development within the wider Parish should demonstrate the following:<br>a) Well-designed proposals which seek to enhance distinctive character, in particular the soft edges of the village, will be supported. All proposals for new development should integrate into the village's landscape setting and avoid creating unsatisfactory, overly hard edges to the villages. The retention of existing planting and vegetation will be particularly supported;<br>b) Proposals which incorporate soft landscaping on boundaries will be supported in general, and southern and eastern boundaries of the Woodbeck Estate in particular;<br>c) Development proposals should be designed to maintain the rural appearance of the villages' approaches through sensitive siting and the retention of existing roadside planting and important frontages, as identified on Map 11;<br>d) Outside of the established settlements of Rampton and Woodbeck, new development forms, such as agricultural buildings, should be carefully sited and designed so as to minimise their visual impact on the landscape setting. New development should explore opportunities to utilise existing tree planting to partially screen the development and help it better integrate into its setting and/or introduce new tree planting as a means to mitigate against any potential harmful impacts on the landscape character;<br>e) The areas identified as local wildlife sites, as identified on Map 12 are safeguarded as areas for nature conservation. Development at these sites will not be supported unless other material considerations outweigh those of nature conservation or that its impact can be appropriately mitigated against on a new or adjoining site. | The Project is located west of Woodbeck and entirely outside the Rampton and Woodbeck Parish boundary.<br>The Important Frontages identified on Map 11 of the Neighbourhood Plan are situated within the immediate vicinity of Rampton village and are not close to the Project. Due to this physical separation and the intervening rural landscape and built form, these streetscapes and frontages will experience no direct loss, physical disruption, or direct setting impacts as a result of the Project.<br>The Local Wildlife Sites (LWS) identified on Map 12 of the Neighbourhood Plan are located to the east of Woodbeck, on the opposite side of the settlement from the proposed overhead line alignment. There will consequently be no direct physical effects, habitat loss, or land-take affecting these designated sites.<br>Potential indirect and biodiversity effects across the wider corridor have been assessed in **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, which concludes that with the application of standard control and management measures set out in the **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, no significant adverse effects will arise on non-statutory nature conservation designations within the vicinity.<br>Furthermore, in accordance with NPS EN-1 (Section 4.6), the Project is committed to delivering a minimum of 10% Biodiversity Net Gain (BNG) through habitat enhancement and creation, as set out in **Application Document 7.1 Biodiversity Net Gain Report** and managed through **Application Document 7.8 Outline Landscape and Ecology Management Plan**, to be secured via Requirements of the **Application Document 3.1 Draft Development Consent Order**. |

## 2.16 Treswell with Cottam Neighbourhood Plan (2024)

Table 2.16 – Signposting for Compliance with the Treswell with Cottam Neighbourhood Plan (2024)

| Policy | Treswell with Cottam Neighbourhood Plan - Policy Requirement | Project Compliance |
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| Policy 6: Local Design Code | 1. As appropriate to their scale, nature and location, development proposals should be design-led and comprise development and spaces that are high quality and distinctive to the Parish. Development should:<br>a) take inspiration from the identified character area concerned, as identified within the most up-to-date Treswell with Cottam Character Assessment;<br>b) respect existing plot boundaries, ratios, orientation and the historic or traditional forms and grain of development within its character area;<br>c) respect the predominant materials used in the immediate area which include red-brick and clay pantile;<br>d) reflect high quality standards and, where possible, reflect local design references in both the natural and built environment and reflect and reinforce local distinctiveness; | The Project does not overlap with any of the defined Treswell with Cottam Character Areas identified within the Character Assessment.<br>Good design has been embedded into the scheme from the outset in accordance with National Policy Statement EN-1 (Section 4.7), NPS EN-5 (Section 2.9), and the Holford guidance. As set out in **Application Document 5.10 Design Approach Document** and **Application Document 7.20 / 5.9 Design Development Report**, the routeing and siting of the proposed 400 kV overhead line have been developed to follow existing infrastructure corridors and parallel existing alignments where practicable, minimising the visual and physical intrusion into the open rural landscape and avoiding sensitive settlement edges<br>Potential landscape and visual effects on the surrounding rural landscape within Bassetlaw have been assessed in **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**. Where vegetation removal is required, mitigation measures, including reinstatement, replacement planting, and habitat enhancement, are secured via **Application Document 7.8 Outline Landscape and Ecology** |

| Policy | Treswell with Cottam Neighbourhood Plan - Policy Requirement | Project Compliance |
|---|---|---|
| | e) be in-keeping with the height of neighbouring properties and demonstrate how heights of the development will not be over-bearing or dominant in the existing street-scene;<br>f) be protected from unsympathetic development where this would have an adverse impact on the spacious character of the existing site and the area;<br>g) take inspiration from the existing predominant boundary treatments appropriate to the immediate buildings and wider character of that part of the village. These consist of low brick walls, low wooden fences or hawthorn hedging;<br>h) preserve and, if possible, enhance listed buildings and non-designated heritage assets and their setting; and<br>i) maximise opportunities for solar gain through an appropriate orientation of the dwelling(s). Any incorporation of renewable energy materials shall consider their impact on both the character of the building and the wider area. | **Management Plan** and the **Application 7.3 Register of Environmental Actions and Commitments**, to be secured through Requirements of the **Application Document 3.1 Draft Development Consent Order.** |
| Policy 9: Lee Beck Green Corridor | 1. Development proposals, which enhance the setting of Lee Beck, as identified in Figure 27, and its associated amenity value and biodiversity, will be supported. Where appropriate, development proposals adjacent to Lee Beck, should:<br>a) seek to retain and enhance, where possible, public access and extend access through the formation of waterside walkways;<br>b) not increase any increased risk of flooding or surface water runoff to nearby properties;<br>c) preserve and enhance its amenity, biodiversity, identified important trees and hedgerows and recreational value. | Siting and routeing of the Project have sought to avoid direct physical interaction and sensitive hydrological features within the Lee Beck watercourse and its associated green corridor, adhering to the mitigation hierarchy.<br>A site-specific flood risk assessment has been prepared in accordance with NPS EN-1 **(Section 5.8) as set out in Application Document 7.13 Flood Risk Assessment**. The FRA evaluates potential flood risk impacts across fluvial, pluvial, and surface water pathways to ensure the scheme does not exacerbate flood risk within or downstream of local watercourses.<br>The Project crosses Lee Beck, further west of Treswell and does not overlap with the policy area identified in the plan. Lee Beck flows west to east towards Treswell and the policy area is therefore downstream of the Project. **Application Document 6.8 Environmental Statement Chapter 8 Ecology** sets out the effects on habitats. The chapter provides information on how the Project has taken advantage of opportunities to conserve and enhance biodiversity, in line with the requirements of the planning policy.<br>During construction, works within proximate catchments and watercourses are managed via pollution prevention, silt control, and surface water management measures secured through **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Appropriate stand-offs from natural drainage features are implemented wherever practicable to maintain unimpeded conveyance, preserve bank integrity, and safeguard local hydrological regimes in accordance with **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**.<br>Ecological connectivity and riparian buffer functions are safeguarded through measures secured under **Application Document 7.8 Outline Landscape and Ecology Management Plan** and Requirements in the **Application Document 3.1 Draft Development Consent Order**. As demonstrated in **Application Document 5.5 Planning Statement**, the Project will not increase flood risk to local properties or compromise the integrity of the watercourse corridor, according with the drainage, flood management, and ecological objectives of Policy 9. |

## 2.17 Misterton Neighbourhood Plan (2024)

Table 2.17 – Signposting for Compliance with the Misterton Neighbourhood Plan (2024)

| Policy | Misterton Neighbourhood Plan - Policy Requirement | Project Compliance |
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| Policy 1R: Sustainable Development and the Development Boundary | 1. Outside the Development Boundary, proposals will be limited to development which is necessary to support the rural economy or the provision of utilities infrastructure in accordance with the National, District and other policies in this Neighbourhood Plan reflecting the Parish's intrinsic open, rural character.<br>* in accordance with biodiversity net gain requirements as set out in national legislation | The Project is located entirely outside the Development Boundary, but within the Misterton Parish. The elements of the Project which are within the Plan area include a construction access along the Cornley Road, and a proposed construction access north of the River Ide. Neither of which would affect the Parish's intrinsic open, rural character.<br>Potential environmental effects arising from temporary construction traffic and access tracks have been evaluated in **Application Document 6.14 Environmental Statement Chapter 14 Traffic and Transport** and **Application Document 6.6 Environmental Statement Chapter 6 Landscape.** Construction movements and access management will be controlled through measures set out in **Application Document 7.4 Outline Construction Traffic Management Plan** and the **Application Document 7.2 Outline Code of Construction Practice**, ensuring safe access from the highway network while minimising disturbance to local road users and neighbouring amenity.<br>Any temporary ground disturbance, soil compaction, or localised vegetation loss associated with access routes will be mitigated and subsequently reinstated to its previous agricultural or rural condition upon completion of the works, as secured through **Application Document 7.3 Register of Environmental Actions and Commitments**, **Application Document 7.5 Outline Soil Management Plan**, and **Application Document 7.8 Outline Landscape and Ecology Management Plan** pursuant to Requirements of the **Application Document 3.1 Draft Development Consent Order**.<br>As detailed in **Application Document 5.5 Planning Statement**, the temporary and limited nature of the Project elements within Misterton Parish ensures no harm to the countryside or open landscape, according with the overall environmental and locational objectives of Policy 1R. |
| Policy 2R: Improving Green Infrastructure and Biodiversity | 1. Development which is directly related to improving or extending access to green infrastructure such as opportunities for walking and cycling in the Parish will be supported where the proposals;<br>a) do not detract from the landscape character or ecological value; and<br>b) are for improving access to the Local Wildlife Sites and the River Idle corridor as identified on Maps 4 and 5.<br>2. Development proposals will be supported where they protect or enhance existing green infrastructure assets as identified on Maps 4 and 5. Where appropriate development proposals should demonstrate how they would provide linkages to and from existing green infrastructure assets.<br>3. Development should achieve a Biodiversity Net Gain of at least 10% in line with the applicable legislative requirements and in accordance with local and national planning policy. Compensation measures should be a last resort and should be targeted to benefit local conservation priorities as identified in the Nottinghamshire Local Biodiversity Action Plan.<br>4. As appropriate to their scale, nature and location, development proposals should incorporate tree planting. Where on-site provision is not practicable, off-site provision planting elsewhere within the parish will be supported.<br>5. Wherever practicable, development proposals should create or enhance blue-green corridors to protect watercourses and their associated habitats. | The Project's aim is to retain existing vegetation wherever practicable in accordance with **Application Document 7.3 Register of Environmental Actions and Commitments**. Where reasonably practicable, construction elements (such as working areas, accesses, laydown and temporary construction compounds) will be kept to the minimum required and micro-sited to avoid impacts on ecologically important features. Overseen and informed by the ECoW and ArbCoW, sensitive habitats will be demarcated to ensure contractors protect as much vegetation as possible.<br>**Application Document 6.8 Chapter 8 Ecology and Application Document 7.8 Outline Landscape and Ecology Management Plan** including an Outline Landscape Maintenance Management Plan set out how the Project design has incorporated existing green and blue infrastructure features, where practicable, and has incorporated new features, such as woodland.<br>As a general principle, all land which is temporarily impacted by the Project will be reinstated where practicable to its pre-construction condition land use. In addition to the reinstated habitats across the route, there will also be 'mitigation planting areas' located in key locations through the Project. The locations of these areas are detailed within **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design** and Table 8.2 of **Application Document 7.8 Outline Landscape Ecological Management Plan** sets out a list of the mitigation planting areas proposed within the Order limits.<br>The habitats to be created and/or enhanced in these areas (on-site mitigation) have been designed to provide landscape and visual mitigation while also offering ecological value. Along the proposed overhead line, 60 landscape mitigation planting areas have been identified within the Order Limits to provide landscape and visual mitigation, whilst also delivering ecological benefits. Indicative landscape proposals for each of these areas are shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**. |

| Policy | Misterton Neighbourhood Plan - Policy Requirement | Project Compliance |
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| | | The Project has been designed to achieve at least 10% Biodiversity Net Gain, in accordance with the Environment Act 2021 (H.M Government, 2021) using the Statutory Biodiversity Metric (Department for Environment, Food and Rural Affairs, 2025). This is set out in **Application Document 7.1 Biodiversity Net Gain Report**. |
| Policy 3R: Protecting and Enhancing the Landscape Character | 1. Landscape is an important part of the character of the Parish as identified in the Misterton Design Code and the Bassetlaw Landscape Character Study. As appropriate to their scale, nature and location, development proposals should demonstrate how they will respond, conserve and enhance the landscape character and have considered:<br>a) The Key Views as identified on Map 6 and described in Appendix D. The key views have been designated due to their significance and importance to the openness of the landscape character. Development proposals should demonstrate how they would either conserving or enhancing the openness of the affected view(s)<br>b) The Significant Green Gaps as identified on Map 7 and described in Appendix E. The Significant Green Gaps have been designated for their contribution towards the character of the landscape. Each gap has its own qualities, and development proposals adjacent to these areas or otherwise likely to affect them should demonstrate how they would safeguard the positive contribution made by the Significant Green Gap to the landscape and character of the settlement and its wider setting. Development proposals which would have an unacceptable impact on the character of an identified Significant Green Gap will not be supported.<br>2. The accessibility of the natural environment in Misterton Parish is highly valued by local residents. Proposals that protect and where possible extend or enhance the existing Footpaths, Bridleways and Byways will be supported | Three of the Key Views (KV2, 3 and 4) on the western edge of Misterton are directed west toward the Project. Potential landscape and visual effects on the surrounding rural landscape within Bassetlaw have been assessed in **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**. The effects on two of the viewpoints are assessed within Chapter 7: KV2 is equivalent to VP E-02 and KV4 is equivalent to VP E-03.<br>The visual baseline identifies that views for people living and moving around the community of Misterton (represented by viewpoints VP E-01, VP E-02, VP E-03, and VP E-04) possess a high value and high susceptibility to visual change resulting from the Project (Section 7.6). As set out in Table 7.8 (Residual Effects on Communities), the magnitude of change for Misterton is assessed as medium across construction, Year 1 of operation, and Year 15 of operation, resulting in a residual moderate adverse (significant) effect across all phases.<br>With specific reference to the assessed equivalent viewpoints:<br>• KV2 (VP E-02): Represents views from the western edge of Misterton. The proposed 400 kV overhead line introduces new pylons into the rural landscape to the west. While pylons will be visible on the skyline and form noticeable new elements, their presence is seen within the wider open landscape context without fundamentally severing the broader vistas across the countryside.<br>• KV4 (VP E-03 – Gringley Road / Cuckoo Way): Represents views west toward Gringley on the Hill. In Table 7.13 (and Table 7.22), the magnitude of change is assessed as small during construction (minor adverse, not significant) and medium during Year 1 and Year 15 operation, resulting in a moderate adverse effect (significant in EIA terms) as new pylons become noticeable features across the vista.<br>• KV3: While not separately assessed as an independent representative viewpoint within the ES, it shares the same western orientation across the flat arable landscape between Misterton and the Project alignment, and its effects are encompassed within the parish-wide community assessment of moderate adverse (significant).<br>Good design and mitigation have been incorporated from the outset in accordance with NPS EN-1 (Section 5.10) and NPS EN-5 (Section 2.9). As detailed in **Application Document 5.9 Design Development Report**, routeing has sought to maximise separation distances from settlement edges, and the use of standard lattice pylons maintains consistency with existing high-voltage infrastructure across the wider Trent Valley. In addition, hedgerow and tree planting secured under **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments** will help filter and soften views across the landscape over the operational lifetime of the scheme.<br>As concluded in **Application Document 5.5 Planning Statement**, while localised significant visual effects are acknowledged at these western viewpoints, the permanent physical works of the Project remain outside the parish boundary, avoiding direct settlement encroachment, and the urgent national need for Critical National Priority electricity transmission infrastructure outweighs the identified residual visual harm.<br>There is no development proposed within the Significant Gaps.<br>The proposed 400 kV overhead line alignment crosses byway BOAT18 and the construction access on the Cornley Road intersects with Public Right of Way FP17 west of Misterton. Managing PRoW crossing working areas in discussion with the relevant local authorities and applications for any temporary closures would be discussed with the relevant local authority. Access disruption will be |

| Policy | Misterton Neighbourhood Plan - Policy Requirement | Project Compliance |
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| | | minimised, where practicable and safe, while construction activities occur. Any required temporary diversions will be clearly marked at both ends with signage explaining the diversion, the duration of the diversion and a contact number for any concerns. |
| Policy 5R Achieving High-Quality Design | 1. Proposals should demonstrate a high design quality that reinforces the local distinctiveness of the area as defined in the Misterton Design Code 2022.<br>2. Particular attention should be given to landscaping schemes and boundary treatment (using greenery and red brick walls) that reflect the surrounding character.<br>3. As appropriate to their scale, nature and location, development proposals should;<br>a) respond to the local character of both the surrounding area and immediately adjoining neighbouring properties,<br>b) demonstrate sensitive positioning within plots and be of such scale and form as to not dominate neighbouring properties or the streetscape,<br>c) where redeveloping existing buildings, show a thorough understanding of the history and design qualities of the buildings and provide a clear rationale for how this is taken into account in the design of the proposals,<br>d) use native trees and hedgerows in landscaping schemes and boundary treatments unless alternative tree species can be justified,<br>e) use materials that reflect those dominant in the adjoining area with red brick and pale render for facades and red pantiles and grey slate tiles for roofs,<br>f) overall, a colour palette reflecting the hues in local materials,<br>g) be of a scale and mass that is sympathetic to heritage assets and their setting in accordance with National and District policies,<br>h) implement the principles of the Drainage Hierarchy (Planning Practice Guidance paragraph 56); and<br>i) incorporate Sustainable Drainage systems at the outset and be water efficient.<br>4. Boundary treatments should;<br>a) include low red brick walls or wrought iron fencing in keeping with the style in the village and planting where possible to soften wall boundaries,<br>b) provide clear visual and physical boundaries between public and private spaces as well as between dwellings,<br>c) avoid long stretches of wooden fencing which have a consistent height and/or appearance, and<br>d) be of a size and scale that responds to its position in the street scene or the local environment.<br>5. Wherever practicable, decorative brick, stone and wood detailing should provide references to the history of the parish.<br>6. Development proposals should maximise the opportunity to enhance green links by protecting and expanding green elements, for example connecting to existing footpaths, utilising and improving existing hedgerows and tree cover on the site.<br>7. Well-designed buildings should be appropriate to their location and context. This may include innovative and contemporary design solutions provided they positively enhance the character and local distinctiveness. | Siting and design of the Project have adhered strictly to the mitigation hierarchy, avoiding key ecological designations, ancient woodland, and core habitats within the parish. The proposed 400 kV overhead line alignment is located outside Misterton Parish, with elements within the parish limited to temporary construction access along Cornley Road and north of the River Idle, avoiding permanent land-take within sensitive habitats.<br>Ecological features, watercourse corridors, and protected species have been assessed in **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, **Application Document 6.9 Environmental Statement Chapter 9 Ornithology)**, and **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**. Stand-offs have been applied from main rivers, drains, and ditches to preserve riparian wildlife corridors, and existing crossing points are utilised where practicable to prevent severance.<br>Potential construction impacts on vegetation, hedgerows, and species are managed through control measures outlined in the **Application Document 7.2 Outline Code of Construction Practice** and the **Application Document 7.3 Register of Environmental Actions and Commitments**, to be secured through Requirements of the **Application Document 3.1 Draft Development Consent Order**.<br>These include pre-construction ecological surveys, Ecological Clerk of Works (ECoW) supervision, and protection of retained trees and hedgerows in accordance with BS 5837:2012. All temporary access land will be reinstated to its prior condition following construction.<br>In accordance with NPS EN-1 (Section 4.6), National Grid is committed to delivering at least 10% Biodiversity Net Gain. A comprehensive BNG assessment using the statutory metric is detailed in **Application Document 7.1 Biodiversity Net Gain Report,** supported by long-term habitat management and enhancement measures set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan**. On this basis, the Project preserves the functionality of ecological corridors within Misterton and delivers measurable biodiversity benefits, according with Policy 5R. |

| Policy | Misterton Neighbourhood Plan - Policy Requirement | Project Compliance |
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| Policy 6R: Renewable Energy, Energy Efficiency and Low Carbon Technologies | 1. Where it is practicable to do so, and as appropriate to their scale and nature, development proposals should incorporate sustainable design features to reduce carbon emissions, minimise the use of scarce resources and mitigate against and adapt to climate change.<br>2. Innovative approaches to the construction of low carbon homes which demonstrate sustainable use of resources and high energy efficiency levels will be supported where the resultant-built form respects the character of the setting. Examples would include, but would not be limited to;<br>a) the use of alternative heat sources to gas,<br>b) siting and orientation to optimise passive solar gain,<br>c) the use of high quality, thermally efficient building materials,<br>d) installation of energy efficiency measures such as loft and wall insulation and double glazing,<br>e) the installation of solar panels,<br>f) the installation of electrical charging points,<br>g) a water efficient design (110 litres per person per day),<br>h) ensuring every new home has a charging point for electric vehicles.<br>3. Proposals for the retrofitting of energy efficiency measures into existing buildings (including listed buildings) will be supported where the works involved safeguard the character, integrity and historic importance of the building concerned.<br>4. As appropriate to their scale, nature and location, development proposals should demonstrate that they are water-efficient, and incorporate innovative water efficiency and water re-use measures.<br>5. Proposals for the development of renewable and low carbon sources of energy, will be supported provided that;<br>a) the developer has provided a thorough analysis of the landscape impact demonstrating an ability to mitigate visual, noise, dust, smell and reflected light intrusion;<br>b) residents' living conditions, amenity, health and quality of life are or can be made acceptable during construction, operation and decommissioning of installations;<br>c) the development results in a biodiversity net gain and is supported by a management plan to ensure that the net gain remains for the lifetime of the development;<br>d) the setting of historical, archaeological, designated and non-designated heritage assets is not unacceptably harmed; and<br>e) the proposal is not located in an area identified for its landscape sensitivity (Significant Green Gap or Local Green Space), or environmental quality (Local Wildlife Sites); and<br>f) supporting information shows how the surrounding environment will be protected and how full site restoration to its former use will be achieved when production ceases. | Part 5 is relevant to the Project. The other policies are regarding residential development.<br>Siting and routeing of the Project have adhered to the mitigation hierarchy, avoiding direct physical interaction with designated and non-designated heritage assets within Misterton Parish. The proposed 400 kV overhead line is located outside the parish boundary, with works within the parish confined to temporary construction access routes along Cornley Road and north of the River Idle, thereby avoiding permanent alterations to the historic core or traditional built form of the settlement.<br>Cultural heritage and archaeological effects have been evaluated in **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** and supported by the baseline data in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report**.<br>In relation to designated heritage within the parish, the Chapter specifically assesses the potential impacts upon the Grade I listed Church of All Saints (NHLE: 1302717) located approximately 1.4 km east of the proposed overhead line LoD. The church's high heritage value derives from its medieval architectural and historical interest, with its setting dominated by the enclosed churchyard and historic core of Misterton. The tower is experienced in the wider rural countryside primarily on the western approach to the village along Cornley Road. The assessment confirms that during construction there would be no impact and no effect upon the church, as construction activities at 1.4 km distance would not be perceptible from the asset or affect its setting. During operation, the proposed overhead line crosses Cornley Road to the west; while it will interrupt the views of the tower along Cornley Road (where the tower is a small distant feature on the treeline), closer and clearer views are retained approaching the village, and views from the church and its churchyard remain unaffected. The operational visual change is assessed as a negligible magnitude of impact resulting in a permanent negligible effect (not significant) and less than substantial harm at the lowest level, fully according with the statutory tests in the Planning (Listed Buildings and Conservation Areas) Act 1990, NPS EN-1, and the protective aims of Policy 6R.<br>The assessment concludes that the Project will not result in substantial harm to any designated heritage assets, and the temporary presence of access tracks will not result in permanent or severe harm to the historic setting of the parish or its non-designated features.<br>Potential impacts on known or previously undiscovered buried archaeology along temporary construction routes are managed through the procedures set out in **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**. This secured framework provides for pre-construction trial trenching/evaluation, archaeological monitoring and recording (strip, map, and sample where applicable), preservation in situ where appropriate, and established protocols for unexpected archaeological discoveries during construction, in accordance with NPS EN-1 (Section 5.9).<br>Following completion of construction, all temporary access surfaces will be removed and agricultural ground reinstated in accordance with the **Application Document 7.2 Outline Code of Construction Practice** and the **Application Document 7.3 Register of Environmental Actions and Commitments**, secured via Requirements of the **Application Document 3.1 Draft Development Consent Order.** As set out in **Application Document 5.5 Planning Statement**, the Project respects the historic environment of the parish and complies with the heritage protection and recording objectives of Policy 6R. |

| Policy | Misterton Neighbourhood Plan - Policy Requirement | Project Compliance |
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| Policy 8R: Protecting and Enhancing Heritage Assets | 1. Development proposals which would retain, restore, or sensitively reconfigure locally important heritage assets will be supported.<br>2. The effect of an application on the significance of a non-designated heritage asset (as shown on Maps 11a and 11b) should be considered in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. | Siting and routeing of the Project have adhered to the mitigation hierarchy to avoid direct physical impacts or loss of known non-designated heritage assets and archaeological sites within the parish. Elements of the Project within Misterton Parish are limited to temporary construction access along Cornley Road and north of the River Idle; no operational pylons or permanent ground infrastructure are located within the parish boundary.<br>The cultural heritage assessment in **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage)**, supported by **Application Document 6.10.A2 Environmental Statement Appendix 10.2 Cultural Heritage Baseline Report**, evaluates potential direct physical impacts as well as changes to the settings of non-designated built heritage and archaeological features. In accordance with the study area criteria agreed with statutory consultees, Misterton village lies approximately 1.1 km from the Limits of Deviation (LoD) of the proposed overhead line, meaning local non-designated buildings within the village core fall outside the study area for setting impacts, with no significant setting effects identified on local village assets.<br>Potential impacts on known or previously undiscovered below-ground archaeological assets along temporary construction access routes are managed and mitigated through the procedures set out in the **Application Document 7.9 Outline Archaeological Written Scheme of Investigation** and the **Application Document 7.10 Outline Cultural Heritage Management** secured under Requirements of the **Application Document 3.1 Draft Development Consent Order**. These measures provide for pre-construction trial trenching, watching briefs/monitoring, preservation in situ where practicable, and advance archaeological excavation and recording to preserve any asset by record, alongside protocols for unexpected discoveries.<br>Upon completion of construction, all temporary access surfaces will be removed and agricultural land reinstated in accordance with the **Application Document 7.2 Outline Code of Construction Practice** and the **Application Document 7.3 Register of Environmental Actions and Commitments**. In line with NPS EN-1 (Paragraph 5.9.34) and NPPF Paragraph 216, the balanced judgement demonstrates that the Project avoids substantial harm, preserves the significance and setting of NDHAs, and accords with Policy 8R. |

## 2.18 Walkeringham Neighbourhood Plan (2021)

Table 2.18 – Signposting for Compliance with the Walkeringham Neighbourhood Plan (2021)

| Policy | Walkeringham Neighbourhood Plan - Policy Requirement | Project Compliance |
|---|---|---|
| Policy 1: Sustainable Development, infill and the development boundary | 1. Development proposals that are within the Development Boundary defined on Map 12 will be supported where they can demonstrate that they satisfy the principles of sustainable development by;<br>a) meeting development needs as defined in District and Neighbourhood policies; and<br>b) being of a scale, density, layout and design that is compatible with the local, rural character, appearance and amenity of that part of Walkeringham Village in which it is located; and<br>c) not causing the loss of, or damage to, areas important to the character of the settlement as identified on Map 10; and<br>d) not resulting in the loss of designated areas of nature conservation as identified on Map 3; and<br>e) not resulting in the loss of the sense of openness created by the green gaps on Map 14; and | The Project is not located within the Development Boundary, however it is sited within the western edge of the Parish.<br>The Project is a linear, nationally significant electricity transmission reinforcement (a 400 kV overhead line) brought forward under the Planning Act 2008 to meet the urgent national need for Critical National Priority low-carbon infrastructure, as established under National Policy Statement EN-1 (Section 3.3 and Section 4.2) and NPS EN-5. Due to its linear and strategic nature, must necessarily traverse rural landscapes.<br>Landscape and visual effects have been assessed in **Application Document 6.6 Environmental Statement Chapter 6 Landscape and Application Document 6.7 Environmental Statement Chapter 7 Visual**. While the presence of new overhead line infrastructure in the open landscape to the west of Walkeringham will result in a visual change for the community (assessed in Table 7.8 of Chapter 7 as a moderate adverse (significant) effect at Year 1 and Year 15 of operation), the alignment follows established design principles and the Holford guidance to minimise intrusive effects on local settlement edges and sensitive receptors as far as practicable. |

| Policy | Walkeringham Neighbourhood Plan - Policy Requirement | Project Compliance |
|---|---|---|
| | f) incorporating any natural or built features on the site that have heritage or nature conservation value into the scheme where practicable; and<br>g) incorporating measures which would promote walking, cycling and the use of public transport in the design and layout of the proposed development; and<br>h) including Sustainable Drainage Systems that improve biodiversity as well as mitigating surface water flood risk.<br>2. Outside the Development Boundary proposals will be limited to development that is necessary to support the rural economy in accordance with District, countryside and other relevant policies in this Neighbourhood Plan reflecting its intrinsic open, rural character. | Embedded and additional landscape mitigation measures, including replacement planting and habitat enhancement, are secured via **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Temporary construction effects on highway networks, amenity, and the local environment are controlled and managed through the **Application Document 7.4 Outline Construction Traffic Management Plan**, **Application Document 7.5 Outline Soil Management Plan**, and **Application Document 7.2 Outline Code of Construction Practice,** which are secured by Requirements of the **Application Document 3.1 Draft Development Consent Order**.<br>All temporary working areas will be fully reinstated to their previous condition following the completion of works. . |
| Policy 2: Protecting the Natural Environment and Landscape Character | 1. Development across Walkeringham Parish should demonstrate that;<br>a) it is sympathetic to the local character and landscape setting as defined in the Walkeringham Character Study and Design Guide 2018; and<br>b) it does not represent a unacceptable visual intrusion into the landscape setting, particularly the significant middle and long-distance vistas and viewpoints into and out of the village that are highlighted in Map 13 and Appendix B and that are valued by local people.<br>2. Mitigation planting and boundary treatment should include native species recommended for the Mid Nottinghamshire Farmlands Landscape Character Area<br>3. Development in Walkeringham Village should present a soft boundary to the open countryside (native hedges, low fences and native trees) to minimise the impact of development on the landscape character.<br>4. Development proposals should safeguard and take account of the identified significant vistas and viewpoints as shown on Map 13 and detailed in Appendix B. Development proposals which would have an unacceptable impact on any of the identified vistas and viewpoints in general, and the way in which they contribute to a sense of openness and place in the neighbourhood area in particular will not be supported.<br>5. Development proposals should respect the way in which the identified significant green gaps as shown on Map 14 contribute to the character of the neighbourhood area.<br>6. Development should incorporate Sustainable Drainage Systems (SuDS) where practicable and related to the circumstances of the site concerned. SuDS proposals should be managed in line with the Government's Water Strategy. In particular SuDs proposals should;<br>a) provide multifunctional benefits (for example enhancing biodiversity) by providing natural flood management and mitigation through the improvement or creation of green infrastructure; and<br>b) take account of advice from the lead local flood authority and sewage management company.<br>7. Proposals that would result in the net loss of biodiversity will not be supported. Development should aim to achieve a net biodiversity gain, in accordance with local and national planning policy. If significant ecological impacts are identified, appropriate mitigation or compensation measures will be required. These measures should be targeted to benefit local conservation priorities as identified in the Nottinghamshire Local Biodiversity Action Plan. | Siting and design of the Project have adhered to the mitigation hierarchy, locating the proposed 400 kV overhead line within the western edge of the parish and well away from the built-up core of Walkeringham.<br>The significant vistas identified on Map 13 of the Neighbourhood Plan are either internal to the settlement or are facing away from the Project. Siting the infrastructure to the west of the parish ensures that these locally protected viewing corridors and key townscape outlooks will not be directly interrupted or compromised by the Project.<br>Similarly, the green gaps identified on Map 14 are located in areas within the village and are not near to the Project. The scheme involves no built development, physical sprawl, or encroachment within or between these internal settlement buffers, ensuring that the physical separation, distinct identity, and compact form of the village are maintained.<br>Ecological considerations and mitigation are evaluated in **Application Document 6.8 Environmental Statement Chapter 8 Ecology**, which details how the Project has taken advantage of opportunities to conserve and enhance biodiversity. Impacts on local habitats and protected species during construction will be avoided or minimised through measures secured in the **Application Document 7.2 Outline Code of Construction Practice** and the **Application Document 7.3 Register of Environmental Actions and Commitments**, including pre-construction surveys and the protection of retained hedgerows and trees in accordance with BS 5837:2012. Following construction, all temporary working areas will be fully reinstated to their previous condition.<br>The Project has been designed to achieve at least 10% Biodiversity Net Gain, in accordance with the Environment Act 2021 (H.M Government, 2021) using the Statutory Biodiversity Metric (Department for Environment, Food and Rural Affairs, 2025). This is set out in **Application Document 7.1 Biodiversity Net Gain Report** and supported by habitat creation and management measures detailed in **Application Document 7.8 Outline Landscape and Ecology Management Plan**, which will be secured via Requirements of the **Application Document 3.1 Draft Development Consent Order**. |

| Policy | Walkeringham Neighbourhood Plan - Policy Requirement | Project Compliance |
|---|---|---|
| Policy 3: The Importance of Energy Efficiency and High Quality Design | 1. Proposals should demonstrate a high design quality that will contribute to the character of the Village. In order to achieve this, new development proposals should reinforce the character of the area as defined in the Walkeringham Character Study and Design Guide 2018.<br>2. Particular attention should be given to landscaping schemes and boundary treatment (using native trees and hedgerows) that reflect the surrounding character.<br>3. Materials, scale and massing should also reinforce the existing character area as defined in the Walkeringham Character Study and Design Guide 2018. Materials should reflect the local materials, style and colour palette of the character area in which it is located.<br>4. To be supported, proposals should demonstrate how:<br>a) the buildings, landscaping and planting creates well defined streets and attractive green spaces; and<br>b) the layout maximises opportunities to integrate new development with the existing settlement pattern; and<br>c) safe access, parking and servicing arrangements have been provided.<br>5. Well-designed buildings should be appropriate to their location and context this may include innovative and contemporary design solutions provided they positively enhance the character and local distinctiveness.<br>6. Innovative approaches to the construction of low carbon homes which demonstrate sustainable use of resources and high energy efficiency levels will be supported.<br>7. The retrofit of heritage properties/assets will be supported to reduce energy demand and to generate renewable energy where appropriate, providing it safeguards heritage assets. | Siting and design of the Project have adhered to the mitigation hierarchy, locating the proposed 400 kV overhead line within the western edge of the parish and well away from the built-up core of Walkeringham. By maintaining substantial physical separation from the settlement, the Project avoids direct encroachment upon the historic core, village layout, and traditional built vernacular of Walkeringham.<br>Good design for major electricity transmission infrastructure has been embedded from the outset in accordance with National Policy Statement EN-1 (Section 4.7), NPS EN-5 (Section 2.9), and the Holford guidance. As detailed in **Application Document 5.10 Design Approach Document** and **Application Document 5.9 Design Development Report**, standard lattice pylons are utilized to maintain consistency with existing high-voltage transmission assets within the region. Operational and functional constraints of 400 kV infrastructure preclude a standard placemaking approach; however, routing has carefully considered local topography and existing vegetation to minimise landscape and visual disruption.<br>Potential landscape and visual effects on the western rural setting of Walkeringham have been assessed in **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**, which note that whilst visual change occurs across the wider parish (residual moderate adverse, significant), key internal settlement vistas are avoided. Cultural heritage impacts have been evaluated in **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage.** confirming that the scheme avoids direct physical impact on designated and non-designated heritage assets within the parish, with any indirect setting impacts to built heritage in the wider area falling within the less than substantial harm spectrum.<br>Where localised ground disturbance or vegetation removal occurs along temporary access tracks or working areas, full reinstatement to original condition will take place in accordance with the **Application 7.2 Outline Code of Construction Practice**, the **Application Document 7.8 Outline Landscape and Ecology Management Plan**, and the **Application Document 7.3 Register of Environmental Actions and Commitments**, secured via Requirements of the **Application Document 3.1 Draft Development Consent Order**. As concluded in **Application Document 5.5 Planning Statement**, the sensitive western siting of the linear infrastructure respects the historic settlement fabric and character of the village, according with the overarching design and heritage principles of Policy 3. |

## 2.19 Sturton Ward Neighbourhood Plan

Table 2.19 – Signposting for Compliance with the Sturton Ward Neighbourhood Plan

| Policy | Sturton Ward Neighbourhood Plan - Policy Requirement | Project Compliance |
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| Policy 1: Sustainable development, infill and the development boundary | 1. Development proposals that are within the development boundaries defined on Maps 2a, 2b and 2c will be supported where they can demonstrate that they satisfy the principles of sustainable development by:<br>a) meeting development needs as defined in District and Neighbourhood Plan policies; and<br>b) being of a scale, density, layout and design that is compatible with the character, appearance and amenity of that part of the Ward in which the proposal is located, as defined in the Sturton Ward Design Guide (2020); and<br>c) safeguarding the integrity, function and character of the significant green gaps (identified on Maps 6a, 6b and 6c), local nature reserves or any other area designated for its nature conservation or priority habitat (identified on Map 7); and | Siting and routeing of the Project have adhered to the mitigation hierarchy to avoid direct encroachment into settlement boundaries, with the proposed 400 kV overhead line alignment located in the open rural landscape between Sturton-le-Steeple and North Wheatley.<br>The Project does not affect any of the significant green gaps identified within the Neighbourhood Plan, ensuring that the physical and visual openness which they provide is unaffected.<br>Potential landscape and visual effects on the communities in the Ward have been assessed in **Application Document 6.7 Environmental Statement Chapter 7 Visual**. As set out in Table 7.8 (Residual Effects on Communities), the effects on the affected communities are summarised as follows:<br>• Sturton le Steeple: The value of views is assessed as medium and receptor susceptibility as high. During construction, the magnitude of change is small, resulting in a minor adverse (not significant) |

| Policy | Sturton Ward Neighbourhood Plan - Policy Requirement | Project Compliance |
|---|---|---|
| | d) incorporating into the scheme any natural or built features on the site which have heritage or conservation value, wherever possible; and<br>e) promoting walking, cycling and the use of public transport; and<br>f) including sustainable drainage systems (SuDS) that improve biodiversity, as well as mitigating surface water flood risk where outfall is a key design consideration in accordance with the drainage hierarchy (Planning Practice Guidance, paragraph 80)<br>2. Development proposals outside the defined development boundaries will be carefully controlled in accordance with national and local planning policies. | effect. During Year 1 and Year 15 of operation, the magnitude of change is assessed as medium, leading to a residual moderate adverse (significant) visual effect across the community.<br>• North and South Wheatley: The value of views is assessed as medium and receptor susceptibility as high. Across construction, Year 1 of operation, and Year 15 of operation, the magnitude of change is assessed as small, resulting in a minor adverse (not significant) visual effect across all phases.<br>In relation to ecology and arboriculture, the Project avoids all but one of the Local Wildlife Sites identified on Map 7 of the Plan, and all of the Tree Protection Order. The only Local Wildlife Site identified on Map 7 that is affected is a small section of Caddow Wood LWS. Potential ecological effects have been evaluated in **Application Document 6.8 Environmental Statement Chapter 8 Ecology** and arboricultural impacts in **Application Document 7.14 Arboricultural Impact Assessment**. Unavoidable vegetation loss will be minimised through detailed micro-siting where practicable and managed in accordance with BS 5837:2012 and BS 3998:2010 under the supervision of an Arboricultural Clerk of Works (ArbCoW) and Ecological Clerk of Works (ECoW). Specific additional landscape and woodland mitigation planting to filter views and compensate for vegetation loss is secured under **Application Document 7.8 Outline Landscape and Ecology Management Plan** (including Refs 42–46 and 49–50) and **Application Document 7.3 Register of Environmental Actions and Commitments**, to be delivered via Requirements of the **Application Document 3.1 Draft Development Consent Order**.<br>The Project is committed to delivering a minimum of 10% Biodiversity Net Gain (BNG) in accordance with NPS EN-1 (Section 4.6), as detailed in **Application Document 7.1 Biodiversity Net Gain Report**. Temporary working areas and construction access tracks will be fully reinstated following construction in accordance with the **Application Document 7.2 Outline Code of Construction Practice**.<br>As detailed in **Application Document 5.5 Planning Statement**, given the preservation of significant green gaps, the avoidance of key environmental assets, and the urgent national need for Critical National Priority electricity transmission infrastructure, the scheme accords with the overarching environmental and spatial intentions of Policy 1. |
| Policy 2a: Protecting the landscape character, significant green gaps and key views | 1. As appropriate to their scale, nature and location, development proposals should protect the positive attributes of the open countryside and landscape character as identified within the Bassetlaw Landscape Character Assessment and the Sturton Ward Design Code 2020. Where appropriate, mitigation planting should include native species recommended for the Mid Nottinghamshire Farmlands or Trent Washlands character areas.<br>2. The Plan designates the parcels of land shown on Maps 6a, 6b and 6c as Significant Green Gaps. Development proposals should demonstrate how they would safeguard the positive contribution made by the affected Significant Green Gap to the landscape and character of the neighbourhood area, the role and character of a settlement affected and, where appropriate its relationship with settlements around the neighbourhood area. Development proposals which would have an unacceptable impact on the character of an identified Significant Green Gap will not be supported.<br>3. Development proposals should respect the views highlighted on Maps 5a, 5b and 5c by careful attention to their layout, massing and height. Development proposals which would have an unacceptable impact on the identified views will not be supported.<br>4. Development proposals (excluding householder development), should demonstrate they have regard to the guidance in the Sturton Ward Design Code (2020) and where practicable:<br>a) retain existing trees and hedges; and | Siting and design of the Project have adhered to the mitigation hierarchy, routing the proposed 400 kV overhead line through open agricultural land while maintaining substantial separation from settlement cores. The Project does not affect any of the significant green gaps identified within the Neighbourhood Plan, ensuring that the physical and visual openness separating communities across the Ward is retained.<br>Potential landscape and visual effects on the surrounding rural landscape and local communities have been assessed in **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**. The specific findings in relation to the Plan's identified viewpoints and associated community assessments are as follows:<br>• **South Wheatley:** Viewpoint 14 within the Neighbourhood Plan is described as ‘St Helen’s Looking towards West Burton’, which is close to representative viewpoint VP E-15 in the Visual Chapter. As set out in Table 7.8 of Chapter 7, the Community Assessment for North and South Wheatley evaluates the value of views as medium and receptor susceptibility as high. Across construction, Year 1 of operation, and Year 15 of operation, the magnitude of change is assessed as small, resulting in a residual minor adverse (not significant) effect across all phases. While the overhead line will be visible in the wider landscape, it will be viewed in the context of existing energy infrastructure and will not alter the fundamental visual character of the community or sever views across the rural setting.<br>• **Sturton le Steeple:** There are no Viewpoints within the Visual Chapter that are equivalent to the specific Viewpoints identified in the Neighbourhood Plan for Sturton. However, the wider visual |

| Policy | Sturton Ward Neighbourhood Plan - Policy Requirement | Project Compliance |
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| | b) use strong planting belts that run horizontal with the contours on sites close to the existing built form; and<br>c) maintain the natural flow of water through water courses and prevent surface water from being connected to the foul sewerage network. | amenity of the settlement has been fully evaluated in the Chapter 7 Community Assessment. For Sturton le Steeple, the value of views is assessed as medium and susceptibility as high. During construction, the magnitude of change is small, resulting in a minor adverse (not significant) effect. During operation at Year 1 and Year 15, the magnitude of change is assessed as medium, resulting in a residual moderate adverse (significant) effect across the community. Specific additional landscape mitigation is proposed in the vicinity of Sturton le Steeple—comprising extensive hedgerow, tree, and woodland planting to the north, west, and south (Refs 42, 43, 44, 45, and 46 in the Outline LEMP)—to filter and soften views of the pylons from the settlement over time.<br>• **North Leverton with Habblesthorpe:** Viewpoint 22 within the Neighbourhood Plan is described as 'Western Edge of Village Towards the Windmill'. Within the Visual Chapter, there is a representative viewpoint in this location: VP E-20. The visual assessment concludes that while North Leverton Windmill is a key local focal point, the proposed overhead line has been deliberately routed away from the Grade II* listed windmill complex to minimise direct visual intrusion, though new pylons will remain visible across the horizon to the west and south.<br>• In Table 7.8 of Chapter 7, the Community Assessment for North Leverton with Habblesthorpe assesses the value of views as high and susceptibility as high. During construction, the magnitude of change is small (minor adverse, not significant). During operation at Year 1 and Year 15, the introduction of the overhead line into views where no electrical infrastructure currently exists results in a medium magnitude of change and a residual major adverse (significant) effect on the community. To mitigate this impact, woodland planting (Refs 49 and 50 in the Outline LEMP) is incorporated to filter views of pylon 4AF220 on higher ground.<br>All landscape mitigation and reinstatement planting measures are secured through **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**, to be delivered pursuant to Requirements of the **Application Document 3.1 Draft Development Consent Order**. As concluded in **Application Document 5.5 Planning Statement**, while localised significant visual effects are acknowledged from certain viewpoints and community edges, significant green gaps are fully protected, and the urgent national need for Critical National Priority electricity transmission infrastructure under NPS EN-1 and EN-5 outweighs the identified residual visual impacts. |
| Policy 2b: Enhancing biodiversity | 1. Proposals which would improve existing environmental assets and enhance biodiversity will be supported. The following enhancements will be particularly supported:<br>a) strengthening hedgerows (gapping up), field boundaries and maintaining the natural flow of water through water courses to provide more robust blue-green habitat 'corridors'; and<br>b) planting wildflower meadows and strips; and<br>c) encouraging native tree and shrub planting on suitable sites, especially species that provide good berry or nectar sources; and<br>d) providing sustainable urban drainage schemes (SuDS) (e.g. rain gardens, ponds and wetland creation) in new schemes and 'retrofitting' where appropriate; and<br>e) providing habitat improvements (i.e. nest or bat boxes) to benefit all bats and bird species of conservation concern such as swifts, swallow, house martin and house sparrows; and<br>f) protecting existing dry ditches which are essential to the sustainable management of surface water.<br>2. Proposals that would result in the net loss of biodiversity will not be supported. Development should aim to achieve a net biodiversity gain in accordance with local | The Project's aim is to retain existing vegetation wherever practicable in accordance with **Application Document 7.3 Register of Environmental Actions and Commitments**. Where reasonably practicable, construction elements (such as working areas, accesses, laydown and temporary construction compounds) will be kept to the minimum required and micro-sited to avoid impacts on ecologically important features. Overseen and informed by the ECoW and ArbCoW, sensitive habitats will be demarcated to ensure contractors protect as much vegetation as possible.<br>As a general principle, all land which is temporarily impacted by the Project will be reinstated where practicable to its pre-construction condition land use. In addition to the reinstated habitats across the route, there will also be 'mitigation planting areas' located in key locations through the Project. The locations of these areas are detailed within **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design** and Table 8.2 of **Application Document 7.8 Outline Landscape Ecological Management Plan** sets out a list of the mitigation planting areas proposed within the Order limits.<br>The habitats to be created and/or enhanced in these areas (on-site mitigation) have been designed to provide landscape and visual mitigation while also offering ecological value. Along the proposed overhead line, 60 landscape mitigation planting areas have been identified within the Order Limits to provide landscape and visual mitigation, whilst also delivering ecological benefits. Indicative landscape proposals for each of these areas are shown on **Application Document 6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design**. |

| Policy | Sturton Ward Neighbourhood Plan - Policy Requirement | Project Compliance |
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| | and national planning policy. If significant ecological impacts are identified, appropriate mitigation or compensation measures will be required. These measures should be targeted to benefit local conservation priorities as identified in the Nottinghamshire Local Biodiversity Action Plan. | National Grid has committed to deliver at least 10% Biodiversity Net Gain with wider environmental and societal benefits. The Project will achieve a minimum of 10% Biodiversity Net Gain (BNG) (though onsite and offsite BNG) and has undertaken a BNG assessment (based on Natural England's Statutory Biodiversity Metric 2024 version (as of June 2025)) which is presented in **Application Document 7.1 Biodiversity Net Gain Report**. |
| Policy 4: Reducing the risk of flooding | 1. All development proposals are required to consider and, when necessary, address the effect of the proposed development on flood risk both on-site and offsite, commensurate with the scale and impact of the development. This should be demonstrated through a flood risk assessment where appropriate and in accordance with national policy.<br>2. Proposals for flood management or other infrastructure which lower the risk of flooding will be supported, subject to the proposal not resulting in an increase in flood risk elsewhere.<br>3. Surface water management should be undertaken, where necessary and practicable, through the utilisation of appropriate SuDS techniques which mimic natural drainage patterns and, where appropriate, achieve net gains for nature through the creation of ponds and wetlands near watercourses and the introduction or enhancement of blue-green corridors. For SuDS techniques which are designed to encourage infiltration, a site-specific infiltration test will be required to ensure that the water table is low enough.<br>4. All developments should be designed to achieve, where appropriate, a net decrease in surface water run-off rates, including through green infrastructure provision such as the planting of native trees and bushes. 5. Development which builds to the optional Building Regulations requirement of 110 litres of water per person per day will be supported. | **Application Document 7.13 Flood Risk Assessment** has been prepared which assesses whether the Project is likely to be at risk of flooding or is likely to increase flood risk elsewhere. The FRA concludes that from the outset of the Project, a sequential approach has been taken to siting infrastructure for the Project, particularly those elements that are vulnerable to inundation, as evidenced in **Application Document 7.17 Strategic Options Report Including Needs Case**.<br>The water environment and flood risk were considered in the early stages of siting and design and embedded measures have been intrinsic to the design of the Project to reduce and where possible avoid flood risks and impacts on the water environment. Embedded mitigation measures are set out in **Application Document 7.3 Register of Environmental Actions and Commitments,** which is secured by **Application Document 3.1 Draft Development Consent Order** and include:<br>• Where possible the design of the temporary haul roads has sought to utilise existing bridges and culverts in order to avoid physical disturbance, impacts on flow regimes.<br>• Large or sensitive watercourses, for example those designated as main river, and those with WFD status, will be crossed by the temporary haul road using temporary clear span bridges to avoid in- channel works and associated effects.<br>• Application of appropriate stand-off distances of 10 m have been applied to watercourses to avoid directs effects where practicable.<br>Temporary infrastructure such as construction compounds, lay down areas (as well as areas where impermeable material will be installed or where heavy equipment would be used) and construction access tracks would be drained using sustainable drainage systems (SuDS) techniques that are suitable for local ground conditions and topography and which are designed to accommodate a 1 in 10-year (10% Annual Exceedance Probability) event, plus a 40% allowance for climate change resilience. These areas will be reinstated after completion of the temporary works, as agreed with the landowner. In addition, measures to control and manage construction impacts are set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments** including those detailed in a Flood Warning and Evacuation Plan, and by programming construction activities in floodplains to avoid periods of likely high river levels where practicable.<br>It is concluded that during the operational phase, the Project is considered to be at low risk of flooding from all sources assessed due to the mitigation measures built into its design. The Project is not anticipated to increase flood risk elsewhere during its operation as any losses of floodplain storage would be compensated for. New impermeable surfaces would be very localised to pylon bases and rainfall runoff from these areas would be attenuated by surrounding reinstated vegetation and would soak back into the ground. The Project would bring significant benefits via its delivery of safe, reliable, and renewable electricity; would not result in an increase in flood risk elsewhere; and has been designed to be resilient to flooding throughout its lifetime. |
| Policy 5: Design principles | 1. As appropriate to their scale, nature and location, development proposals should demonstrate a high design quality that will contribute positively to the character of the Ward and respond positively to the Sturton Ward Design Code (Appendix I).<br>2. As appropriate to their scale, nature and location, development proposals should:<br>a) respond to the local character of both the surrounding area and immediately adjoining neighbouring properties; and | National, local and neighbourhood design guidance including the Sturton Ward Design Code have been considered in the development of the Project's design.<br>The Project comprises a linear, nationally significant electricity transmission reinforcement (a 400 kV overhead line). Due to its functional and operational nature, standard urban placemaking, streetscape design, and residential design codes are not directly applicable. However, good design for major energy infrastructure has been embedded from inception in accordance with NPS EN-1 (Section 4.7), NPS EN-5 (Section 2.9), and the Holford guidance. |

| Policy | Sturton Ward Neighbourhood Plan - Policy Requirement | Project Compliance |
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| | b) demonstrate sensitive positioning within plots and be of such scale and form as to not dominate neighbouring properties or the streetscape; and<br>c) show thorough understanding of the history and design qualities of the buildings and provide a clear rationale for how this is taken into account in the design of the proposals; and<br>d) use native trees and hedgerows where possible in landscaping schemes and boundary treatments; and<br>e) use a colour palette reflecting the hues in local materials; and<br>f) be of a scale and mass that is sympathetic to heritage assets and their setting in accordance with National and District policies; and<br>g) provide buildings, landscaping and planting that creates well-defined streets and attractive green spaces; and<br>h) provide layouts that maximises opportunities to integrate new development with the existing settlement pattern.<br>3. Where development on the edge of a settlement meets the requirements of national and local planning policies and Policies 1,7 and 8 of this Plan, its design should respond positively to the following criteria insofar as they apply to the particular proposal:<br>a) the layout does not lead to the introduction of a hard edge between the built-up part of the settlement and the open countryside; and<br>b) appropriate landscaping is used to soften the development; and<br>c) a lower density is used to emphasise its position between the built-up area of the settlement and the open countryside.<br>4. The electrical infrastructure within all developments should be suitable and ready for the future addition of ultra-low emission vehicle charging infrastructure, in terms of anticipated load capacity. | As detailed in **Application Document 5.10 Design Approach Document** and **Application Document 5.9 Design Development Report**, routing and siting have followed an iterative design process that responds to local landscape character, topography, and environmental constraints. Siting within the Ward maintains substantial physical separation from the built cores of Sturton le Steeple and North Wheatley, avoiding direct encroachment on settlement edges, streetscapes, or the creation of abrupt, hard urban edges against the open countryside. Standard lattice pylons are utilized to ensure visual and structural consistency with existing high-voltage transmission infrastructure in the wider Trent Valley.<br>The design has been developed with careful regard to the setting and historic significance of heritage assets across the Ward in accordance with **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage**. Specific embedded routing measures were incorporated to minimise setting impacts, including routing the alignment away from the Grade II* listed North Leverton Windmill and aligning the route parallel with the existing railway embankment near Sturton le Steeple to mitigate visual dominance.<br>In accordance with criterion 2(d) and criterion 3(b), comprehensive landscape mitigation and boundary softening will be delivered using native species. As set out in **Application Document 7.8 Outline Landscape and Ecology Management Plan** and secured via **Application Document 7.3 Register of Environment Actions and Commitments**, dedicated planting schemes—including hedgerow, tree, and woodland planting around Sturton le Steeple (Refs 42–46) and woodland planting near pylon 4AF220 (Refs 49 and 50)—are provided to filter views from local communities and soften infrastructure within the rural landscape. Delivery is secured via Requirements of the **Application Document 3.1 Draft Development Consent Order**.<br>The core purpose of the Project is to reinforce the National Electricity Transmission System, unlocking grid capacity to support the national transition to net zero and clean energy. In doing so, it provides the strategic high-voltage transmission capability that underpins the ongoing electrification of the economy, including the widespread deployment of electric vehicles and ultra-low emission vehicle charging infrastructure.<br>As concluded in **Application Document 5.5 (Planning Statement)**, the Project incorporates good design, respects local landscape character and heritage settings, and accords with the overarching design and environmental principles of Policy 5 insofar as they relate to major linear energy infrastructure. |
| Policy 6: Protecting the historic environment | 1. Development proposals will be supported where they preserve or enhance the Conservation Area, listed buildings and other heritage assets as set out in Appendix C and where they comply with the following criteria:<br>a) the development or alteration proposed does not have a detrimental effect on the heritage asset concerned; and<br>b) the heritage asset is sensitively and fully incorporated into the development proposal.<br>2. Gardens, open spaces and fields to the south of North and South Wheatley form part of the special interest of the Conservation Area. Development will only be supported on gardens, open spaces between buildings and fields within the Conservation Area where it can be demonstrated that proposals will not harm the character and appearance of the Conservation Area as a whole. | The Project has been designed following the mitigation hierarchy to avoid direct physical impacts to designated and non-designated built heritage assets across the Ward. Siting and routeing of the 400 kV overhead line have sought to maximise separation from historic settlement cores and sensitive heritage assets as far as practicable.<br>Potential impacts on heritage assets and their settings within the Ward have been comprehensively assessed in **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage**, supported by visualisations in **Application Document 6.10.A3 Environmental Statement Appendix 10.3: Cultural Heritage Visualisations**:<br>• North Leverton Windmill (NHLE: 1234469; Grade II) and Windmill Cottage (NHLE: 1276111; Grade II):* Assets of high heritage value. Sited approximately 720 m from the Limits of Deviation (LoD) at their closest point. As an embedded design measure, the overhead line was specifically routed away from the windmill to minimise setting impacts. During construction, assembly plant visibility will result in a small magnitude of impact and a temporary moderate adverse (significant) effect. During operation, the presence of new pylons (4AF221–4AF224) introduces noticeable infrastructure across views to the southwest and south (HVP55–HVP58), altering its wider rural setting and visual prominence as a local landmark (medium magnitude of impact; |

| Policy | Sturton Ward Neighbourhood Plan - Policy Requirement | Project Compliance |
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| | | permanent moderate adverse (significant) effect). Additional woodland planting (Refs 49 and 50 in the Outline LEMP) is incorporated to filter views of pylon 4AF220 on higher ground.<br>• Remains of the Church of St Helen, South Wheatley (NHLE: 1216694; Grade I & Scheduled Monument NHLE: 1006391): An asset of high heritage value located approximately 1.2 km west of the LoD. Following consultee feedback, the route was pushed as far east as possible. Construction activity represents a temporary minor adverse effect (not significant). During operation, the overhead line will be visible in the background of views framed through the surviving Norman chancel arch to the east (HVP53), resulting in a medium magnitude of impact and a permanent moderate adverse (significant) effect.<br>• Church of St Peter and St Paul, Sturton le Steeple (NHLE: 1275773; Grade II):* Located approximately 900 m southeast of the LoD. Construction works represent no effect. In operation, new pylons (4AF209–4AF215) will diminish the prominence of the church tower in kinetic views approaching the settlement along Wheatley Road (HVP54) and Leverton Road, resulting in a small magnitude of impact and a permanent moderate adverse (significant) effect. Siting was adjusted to follow the existing railway embankment to limit this effect.<br>• Medieval Settlement and Open Field System southeast of Low Farm (NHLE: 1017741; Scheduled Monument): Located approximately 1.17 km northeast of the LoD. Seen in the context of existing overhead lines and the former West Burton Power Station, resulting in a temporary negligible adverse effect during construction and a permanent minor adverse (not significant) effect during operation.<br>• Crow Tree Farm (NHLE: 1216936; Grade II) & West End Farm House (NHLE: 1216845; Grade II), Sturton le Steeple: Operational impacts on the wider agricultural setting of both assets are assessed as small, resulting in permanent minor adverse (not significant) effects.<br>• Church of St Martin, North Leverton (NHLE: 1234265; Grade I): Located approximately 1.8 km from the LoD, with no visibility and no impact / no effect across construction and operation.<br>Potential impacts on buried archaeology from ground disturbance (such as pylon foundations, compounds, and access tracks) are managed and mitigated through the **Application Document 7.9 Outline Archaeological Written Scheme of Investigation** and the **Application Document 7.10 Outline Cultural Heritage Management Plan**, secured under Requirements of the **Application Document 3.1 Draft Development Consent Order**. These measures provide for pre-construction trial trenching, targeted excavation and recording to preserve remains by record, and protocols for unexpected archaeological discoveries.<br>In accordance with NPS EN-1 (Section 5.9), the Critical National Priority need for essential electricity transmission infrastructure outweighs the identified less than substantial harm to the setting of heritage assets, according with the overarching principles of Policy 6 |

## 2.20 East Drayton Neighbourhood Plan (2026)

Table 2.20 – Signposting for Compliance with the East Drayton Neighbourhood Plan (2026)

| Policy | East Drayton Neighbourhood Plan - Policy Requirement | Project Compliance |
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| Policy 1: Sustainable Development, Infill and the Development Boundary | 1. Proposals for new development, including the appropriate conversion or change of use of existing buildings, will be supported where they fill a gap within the Development Boundary as defined on Map 3 and where they meet the following criteria:<br>a) the number of dwellings and their associated layout and appearance respond positively to the character of that part of East Drayton village in which it is located;<br>b) wherever practicable they safeguard any features on the site that have a nature conservation value;<br>c) they protect the significance of heritage assets including their setting, and conserve the historic environment of the immediate environment;<br>d) as appropriate to their scale, nature and location proposals do not increase flood risk on site or elsewhere and mitigate flood risk (where applicable) where outfall is a key design consideration. Development proposals should be designed so that they function in a safe way for their lifetime without increasing flood risk elsewhere.<br>2. Development should be designed to minimise the use of carbon in its construction and operation. For residential development, water efficiency should be promoted by meeting the Building Regulations optional requirement of 110 litres/person/day.<br>3. Outside the Development Boundary new development will be limited to that which is necessary to support the rural economy, that which is a rural exception site, or to development that is otherwise in accordance with Policy ST2 (3) of the adopted Local Plan. | Siting and routeing of the Project have adhered strictly to the mitigation hierarchy, locating the proposed 400 kV overhead line alignment entirely outside the East Drayton Development Boundary within the open agricultural landscape to the south and west of the village (specifically pylons 4AF239 to 4AF245).<br>The Project is a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008, brought forward by National Grid to reinforce the high-voltage transmission network and support the delivery of net zero and the Clean Power 2030 mission, representing Critical National Priority (CNP) infrastructure in accordance with NPS EN-1 (Section 3.3 and Section 4.2) and NPS EN-5.<br>Given the linear nature, scale, and strategic function of high-voltage transmission reinforcements, the scheme cannot be accommodated within defined settlement boundaries and must necessarily pass through open countryside. The Project does not introduce residential, commercial, or urbanising built development, avoiding physical sprawl or coalescence and preserving the open separation and rural setting of East Drayton.<br>Landscape and visual effects on the rural setting of East Drayton have been assessed in **Application Document 6.6 Environmental Statement Chapter 6: Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**. As set out in Table 7.8 of Chapter 7, visual amenity across the community is assessed as having high value and high receptor susceptibility. The magnitude of visual change is assessed as medium across construction, Year 1 of operation, and Year 15 of operation, resulting in a residual moderate adverse (significant) effect across the parish as new pylons are introduced into views to the south and west. Embedded design principles and the Holford guidance have been applied from the outset to minimise visual intrusion and maintain appropriate separation from the village core and East Drayton Conservation Area. In addition, landscape mitigation and boundary enhancements are secured via **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>Temporary construction impacts on highway safety, local amenity, and the water environment are controlled and managed through **Application Document 7.4 Outline Construction Traffic Management Plan**, **Application Document 7.5 Outline Soil Management Plan**, and **Application Document 7.2 Outline Code of Construction Practice**, which are secured by Requirements of the **Application Document 3.1 Draft Development Consent Order**. Following the completion of works, all temporary working areas and access tracks will be fully reinstated to their previous agricultural condition. |
| Policy 2: Protecting Landscape Character | 1. Development proposals in the areas identified as having a landscape sensitivity (Map 5) and within the Key Views as shown on Map 6 should be:<br>a) designed to respect this landscape sensitivity and safeguard relevant Key Views. In this way their contribution to the wider character and sense of openness that they provide around East Drayton Village and to the long views out to the open countryside will be maintained,<br>b) accompanied by an objective assessment of the effects the proposals will have on the landscape character and/or a Key View. A prime factor in the decision will be whether the development can be designed in a way that safeguards the views and respects the sensitivity of the landscape. | Siting and routeing of the proposed 400 kV overhead line (specifically pylons 4AF239 to 4AF245) have adhered to National Policy Statements EN-1 (Section 5.10), EN-5 (Section 2.9), and the Holford guidance to maintain separation from the core of East Drayton, using natural landform and existing field vegetation where practicable to filter and soften views towards the transmission alignment.<br>Potential effects on key local views and visual amenity have been comprehensively assessed in **Application Document 6.7 Environmental Statement Chapter 7 Visual**, which are equivalent to two of the viewpoints identified within the Neighbourhood Plan (Map 5):<br>• Viewpoint 4 (Equivalent to Representative Viewpoint VP E-33): Sited to represent views looking across the agricultural landscape towards the Project alignment. The receptor sensitivity is assessed as high. The magnitude of visual change is assessed as medium during construction, Year 1 of operation, and Year 15 of operation. While the introduction of new lattice transmission towers and conductors into open vistas results in a residual moderate adverse (significant) |

| Policy | East Drayton Neighbourhood Plan - Policy Requirement | Project Compliance |
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| | 2. Development proposals that adversely affect the undeveloped character of the areas identified as having landscape sensitivity (Map 5) under the Key Views (Map 6) will not be supported.<br>3. Mature street trees and hedges make a significant contribution to the prevailing character of East Drayton village and, wherever practicable, should be protected.<br>Development proposals that involve the removal of hedgerow boundaries and trees that contribute to the street scene should include a landscape plan, a tree survey and an arboricultural assessment that demonstrates how their planting programme reflects the rural character. Where practicable, any street trees and hedgerows which would be removed should be replaced on a like-for-like basis and form an integrated part of the development proposal.<br>4. The Development proposals should protect, and where practicable enhance Public Rights of Way.<br>5. Any required mitigation planting and boundary treatment should include native species in accordance with the LCA.<br>6. Development should present a soft boundary to the open countryside (including native hedges, low red brick walls and native trees) to minimise the impact of development on the landscape character. | effect, the alignment maintains separation from the village core and does not interrupt the primary compositional qualities of the wider vista.<br>• Viewpoint 8 (Equivalent to Representative Viewpoint VP E-34): Sited to capture long-range rural and setting views across the parish. The receptor sensitivity is assessed as high. The magnitude of visual change is assessed as medium across construction, Year 1, and Year 15 of operation, resulting in a residual moderate adverse (significant) effect. The structures appear as noticeable features on the horizon, but the routeing avoids direct encroachment on the immediate foreground or severance of key view corridors toward historic focal points such as the Church of St Peter.<br>• Whole Community Visual Assessment (East Drayton): As reported in Table 7.8 of Chapter 7, the visual amenity of the East Drayton community as a whole is assessed as having high value and high receptor susceptibility, resulting in an overall high sensitivity. The magnitude of visual change is assessed as medium during construction, Year 1 of operation, and Year 15 of operation. Consequently, the residual visual effect across the community is assessed as moderate adverse (significant), reflecting the visibility of new transmission infrastructure in surrounding views to the south and west.<br>Embedded design measures have sought to minimise these effects by selecting standard lattice pylons that visually permeate with the sky, spacing towers to align with local agricultural field patterns, and avoiding the village settlement boundary. Environmental and landscape mitigation is secured via **Application Document 7.8 Outline Landscape and Ecology Management Plan** and **Application Document 7.3 Register of Environmental Actions and Commitments**, secured by Requirements 4 and 8 of **Application Document 3.1 Draft Development Consent Order**. Construction working areas will be managed under the **Application Document 7.2 Outline Code of Construction Practice** and fully reinstated upon completion.<br>As concluded in **Application Document 5.5 Planning Statement**, given the linear nature and scale of 400 kV Critical National Priority (CNP) infrastructure, localised significant visual effects cannot be wholly avoided. However, in accordance with NPS EN-1 (Section 4.2 and Paragraph 4.2.28), the substantial urgent national need and public benefits of reinforcing the electricity transmission network to deliver the Clean Power 2030 mission and net zero outweigh the identified residual visual impacts on these identified views. |
| Policy 3: Protecting and Enhancing Biodiversity | 1. As appropriate to their scale, nature and location, development proposals should provide at least 10% net biodiversity gain. Where on-site provision of biodiversity net gain cannot be achieved, off-site provision should take place within the neighbourhood area wherever practicable. Any such measures should be targeted to benefit local conservation priorities as identified in the District Council's Landscape Character Assessment or the Local Nature Recovery Strategy were applicable.<br>2. Development proposals which would have significant negative ecological impacts will not be supported unless appropriate mitigation and/or compensation measures are incorporated in the overall development package.<br>3. New development should integrate and increase blue-green infrastructure to build multi-functional solutions to future impacts of increased flood risk, water shortages and overheating. As appropriate to their scale nature and location, development proposals should incorporate Sustainable Drainage Systems which can address flood risk and improve biodiversity.<br>4. Where it is appropriate for higher value tree(s) (category A or B trees – BS5837) * to be lost as part of a development proposal, then appropriate mitigation, via compensatory tree planting, will be required. Such tree planting should be on-site wherever possible and be of an appropriate species for the site. | Siting and design of the Project have adhered to the mitigation hierarchy in accordance with National Policy Statement EN-1 (Section 4.6 and Section 5.4) and NPS EN-5, seeking first to avoid and minimise impacts on ecological networks and green/blue infrastructure across the parish of East Drayton.<br>**Application Document 6.8 Environmental Statement Chapter 8 Ecology** details how baseline ecological surveys and desk studies informed the alignment of the 400 kV overhead line to avoid ancient woodland, veteran trees, and designated wildlife sites. Siting of pylon foundations and temporary construction access routes has been optimised to retain existing field boundaries and avoid severance of riparian corridors and drainage channels.<br>As detailed in **Application Document 6.8 Environmental Statement Chapter 8 Ecology** and **Application Document 7.8 Outline Landscape and Ecology Management Plan including an Outline Landscape Maintenance Management Plan**, the Project design incorporates existing green and blue infrastructure features where practicable. Measures embedded into the scheme include:<br>• The retention and protection of mature trees and established hedgerows using Root Protection Areas (RPAs) in accordance with BS 5837:2012, managed through **Application Document 7.2 Outline Code of Construction Practice**; |

| Policy | East Drayton Neighbourhood Plan - Policy Requirement | Project Compliance |
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| | * Category A – These are generally large, high-quality trees which the local authority will want to see retained if at all possible Category B. Trees of moderate quality or value capable of making a significant contribution to the area for 20 or more years source https://www.crowntrees.co.uk/tree-survey-and-report/tree-survey-faqs/ | • The reinstatement of temporarily severed hedgerows and working land following completion of construction works;<br>• Gapping up degraded hedgerow sections and planting native species-rich hedgerows and trees to restore ecological networks and enhance landscape connectivity across the parish; and<br>• Protection of blue infrastructure features (drains and ditches) through standard buffer zones, pollution prevention, and silt management controls secured under commitments GG16, GG17, and W05 of the **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>The Project has been designed to deliver at least 10% Biodiversity Net Gain (BNG) using the Statutory Biodiversity Metric (Defra). Details of the baseline habitat units, post-development proposals, and calculations are set out in **Application Document 7.1 Biodiversity Net Gain Report**. Delivery and establishment of these enhancements will be governed by the final Landscape and Ecology Management Plan, which is secured by Requirements 4 and 8 of the **Application Document 3.1 Draft Development Consent Order**.<br>The Project conserves and strengthens green and blue infrastructure, protects local wildlife habitats, delivers measurable ecological enhancements, and complies with Policy 3. |
| Policy 5: Reducing the Risk of Flooding | 1. Proposals for flood management, or green/blue infrastructure offering improvements that do not result in an increase in the risk of flooding on site and elsewhere will be supported.<br>2. Wherever practicable, major development proposals should make provision for appropriate surface water drainage which mimic natural drainage patterns and, as appropriate, achieve net gains for nature including through green infrastructure provision such as the planting of native trees and bushes. | The Project has applied a sequential, risk-based approach to the routeing and siting of infrastructure in accordance with NPS EN-1 (Section 5.8) to steer development away from sensitive hydrological features and high-risk flood zones wherever practicable.<br>A site-specific flood risk assessment has been undertaken and is presented in **Application Document 7.13 Flood Risk Assessment**, supported by **Application Document 6.11 Environmental Statement Chapter 11 Water Environment**.<br>The assessment evaluates all potential sources of flooding (fluvial, pluvial/surface water, and groundwater) across the lifecycle of the Project. Operational infrastructure within the parish comprises standard lattice transmission pylons with very localised impermeable footprints at their foundations. Surface water runoff from pylon bases will naturally attenuate across surrounding reinstated permeable ground and soak back into the soil, thereby mimicking natural baseline drainage patterns and preventing any increase in peak run-off rates or flood risk on site or to third-party land elsewhere. During construction, temporary working areas, access tracks, and compounds will incorporate sustainable drainage systems (SuDS) suited to local topography and ground conditions, as secured in **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.2 Outline Code of Construction Practice**. Mitigation measures will maintain existing agricultural drainage regimes, protect local watercourses, and prevent silt-laden runoff, pursuant to Requirements of the **Application Document 3.1 Draft Development Consent Order**. Following completion of works, all temporary working areas will be de-compacted and reinstated to their original agricultural state.<br>In accordance with Part 2 of Policy 5 and NPS EN-1 (Section 4.6), the Project integrates green infrastructure and will deliver a minimum of 10% Biodiversity Net Gain (BNG) through habitat creation and enhancement, including native tree, shrub, and hedgerow planting as detailed in **Application Document 7.1 Biodiversity Net Gain Report** and **Application Document 7.8 Outline Landscape and Ecology Management Plan**. These measures contribute to improved landscape connectivity, water infiltration, and net gains for nature.<br>The Project will not increase flood risk and makes appropriate provision for natural surface water drainage and green infrastructure enhancements, fully according with Policy 5. |

| Policy | East Drayton Neighbourhood Plan - Policy Requirement | Project Compliance |
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| Policy 6: Achieving Well Designed Places | 1. Development proposals should demonstrate a high design quality that will contribute to the character areas of the Parish, Low Street, Top Street, Church Street and North Green as shown on Map 8 and as defined in the East Drayton Design Code 2023.<br>2. Development proposals should respond positively to the Design Codes as set out in Section 4 of the East Drayton Design Code 2023 and, as appropriate to their scale, nature and location, should:<br>a) respond to the local character of the immediate area;<br>b) use materials that reinforce the existing character (red clay pantiles, red brick, or yellow brick, render for contrast);<br>c) have a roof form that reflects the existing roofs of adjacent or neighbouring buildings (being hipped or gable);<br>d) have a scale and massing that reflects neighbouring properties,<br>e) have window sizes and architectural detailing that reinforces the character of the area in which they are located;<br>f) have a boundary treatment of mainly hedgerows but also red brick walls and timber fencing combined with planting;<br>g) have a layout that maximises opportunities to integrate new development with the existing rural character of the village (e.g. courtyards);<br>h) uses buildings, landscaping and planting to reinforce the well-defined streets and attractive green verges.<br>3. Development proposals that front the street should have landscaping that reinforces the street scene. Where the scheme includes a front garden, the landscaping should include the planting of new trees and/or hedgerows and protect existing trees (where possible). | Siting and routeing of the Project have adhered to the Holford guidance and National Policy Statements EN-1 (Section 5.10) and EN-5 (Section 2.9) to safeguard the settlement form and character of East Drayton parish.<br>The Project is not situated within any of the defined Character Areas within the Parish. The proposed 400 kV overhead line alignment is located entirely outside the East Drayton settlement boundary and beyond the identified parish Character Areas, maintaining physical separation from the built core of the village.<br>Because the works do not physically interact with or encroach upon these designated areas, there is no direct impact, physical loss, or alteration of the historic streetscapes, village fabric, architectural features, or spatial layouts that define East Drayton's Character Areas.<br>Indirect landscape and visual effects on the wider parish setting are assessed in **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual**. Siting seeks to minimise setting effects by aligning towers with the existing agricultural field pattern and utilising local topography and hedgerows to filter views from the edge of the parish. Landscape and boundary planting measures secured via **Application Document 7.8 Outline Landscape and Ecology Management Plan** and Requirements 4 and 8 of **Application Document 3.1 Draft Development Consent Order** further help integrate the infrastructure into the broader rural backdrop.<br>By siting all physical infrastructure outside the parish Character Areas and preserving the immediate built form of East Drayton, the Project avoids direct harm to local built distinctiveness and accords with Policy 6. |
| Policy 8: Protecting and Enhancing Heritage Assets | 1. The effect of a proposal on non-designated heritage assets, as shown on Maps 9a, 9b and 9c will be considered based on their significance and in accordance with the approach taken in paragraph 216 of the NPPF. Wherever practicable, proposals should minimise the conflict between the heritage assets' conservation and any aspect of the scheme. | Siting and design of the Project have adhered to the mitigation hierarchy in accordance with NPS EN-1 (Section 5.9), NPS EN-5 (Section 2.9), and the principles of the NPPF (paragraph 216) to identify, conserve, and minimise harm to non-designated heritage assets (NDHAs) and their settings.<br>The assessment reported in **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage** evaluated both designated and non-designated heritage receptors across East Drayton parish, including vernacular buildings, historic farmsteads, and features shown on Maps 9a, 9b, and 9c of the Neighbourhood Plan:<br>• **Non-Designated Built Heritage Assets:** Siting of the 400 kV overhead line avoids direct physical interaction, demolition, or boundary alterations to any non-designated historic building, vernacular cottage, or traditional farmstead within East Drayton. Siting maintains separation from the village core, using existing topography and mature field hedgerows to filter views. In outbound views across open agricultural fields where the upper portions of lattice structures are visible, the magnitude of impact is assessed in Chapter 10 as negligible to low adverse, resulting in a residual effect of minor adverse to negligible (not significant). This limited visual change does not compromise the ability to appreciate their architectural character or historic setting.<br>• **Non-Designated Archaeological Remains:** Potential direct impacts on buried archaeological assets (such as prehistoric/Roman boundary ditch systems, medieval ridge and furrow, and post-medieval agricultural ditches) from foundation excavations and temporary working areas are assessed in Chapter 10 as medium adverse prior to mitigation. Siting has used existing farm tracks where feasible, and harm is mitigated through preservation by record via trial trenching, targeted excavation, and strip-map-and-record secured under the **Application Document 7.9 Outline** |

| Policy | East Drayton Neighbourhood Plan - Policy Requirement | Project Compliance |
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| | | **Archaeological Written Scheme of Investigation** and Requirements in **Application Document 3.1 Draft Development Consent Order**, reducing residual effects to minor adverse (not significant).<br>• **Contextual Setting with Designated Heritage Assets:** Chapter 10 also assessed designated assets whose rural setting interacts with the wider parish landscape:<br>– **Church of St Peter (Grade I listed):** Outbound contextual views from the churchyard perimeter over open agricultural fields experience a low adverse magnitude of change, resulting in a minor adverse (not significant) residual effect, representing harm at the low end of the less than substantial spectrum.<br>– **Old Hall and The Gables (Grade II listed):** Intervening village built form and mature domestic vegetation screen direct views, resulting in a negligible adverse magnitude of impact and a negligible (not significant) residual effect.<br>– **East Drayton Village Core / Conservation Area Setting:** Tower tops are visible in outward views over field edges, but internal village streetscape cohesion and enclosure are preserved, resulting in a low adverse magnitude of change and a minor adverse (not significant) residual effect.<br>Environmental controls, working hour limits, and dust/noise attenuation are secured through **Application Document 7.2 Outline Code of Construction Practice** and the **Application Document 7.3 Register of Environmental Actions and Commitments**.<br>In applying the balanced judgment required under NPPF paragraph 216 and NPS EN-1, the minor, non-significant indirect setting effects on non-designated heritage assets are clearly outweighed by the urgent national strategic need and public benefits delivered by this Critical National Priority (CNP) grid reinforcement in supporting net zero and security of supply. The Project therefore accords with Policy 8. |
| Policy 11: Renewable Energy, Energy Efficiency and Reducing Carbon Usage | 1. New development should incorporate sustainable design features to maximise energy efficiency in accordance with the East Drayton Design Codes.<br>2. Innovative approaches to low carbon buildings and construction which demonstrates sustainable use of resources and high energy efficiency levels will be supported where the resultant-built form respects the character of the setting. Examples include, but would not be limited to;<br>a) the use of alternative heat sources to natural gas,<br>b) siting and orientation to optimise passive solar gain,<br>c) passive design principles (where appropriate),<br>d) the use of high quality, thermally efficient building materials,<br>e) installation of energy efficiency measures such as loft and wall insulation and double/triple glazing,<br>f) meeting the EPC B target set out by the Committee on Climate Change for all new non-domestic buildings,<br>g) maximizing the installation of solar panels including building integrated panel technology on roofs of all orientations except due north.<br>3. The retrofitting of energy efficiency measures is supported, including the retrofitting of listed buildings, provided that it safeguards the historic characteristics of these heritage assets.<br>4. Developments should demonstrate that they are water efficient, incorporating innovative water efficiency and water re-use measures. All housing should meet the Building Regulations requirement of 110 litres per person per day in accordance with BDC Policy ST48. | The Project constitutes linear electricity transmission infrastructure (a 400 kV overhead line) rather than domestic or non-domestic building development. Clauses 1, 2, 3, and 4 relating to architectural design codes, building fabric, EPC ratings, domestic water consumption (BDC Policy ST48), and thermal retrofitting, are not directly applicable to the physical form of overhead line transmission apparatus.<br>However, the Project directly aligns with the strategic intent of Policy 11 by providing the critical national network capacity required to connect and transmit large-scale renewable and low-carbon energy (principally offshore wind), facilitating the decarbonisation of the energy system in accordance with National Policy Statement EN-1 (Section 3.3 and Section 4.2). The overarching environmental and technical criteria set out in Clause 5 are satisfied as follows:<br>• **Strategic Role & Need:** The Project is designated as Critical National Priority (CNP) infrastructure under NPS EN-1. It is essential to unlocking transmission capacity between the Humber and East Midlands, transmitting clean power to demand centres to meet national net zero targets<br>• **Landscape, Visual, and Amenity Analysis (Clause 5a, 5f):** Siting and routeing of the 400 kV overhead line have adhered to the Holford guidance and NPS EN-5 (Section 2.9) to avoid the village envelope and utilise natural landform and field vegetation to filter views. Comprehensive assessments in **Application Document 6.6 Environmental Statement Chapter 6 Landscape** and **Application Document 6.7 Environmental Statement Chapter 7 Visual** evaluate effects on local landscape character and viewpoints (including VP E-33 and VP E-34 / East Drayton NP Viewpoints 4 and 8). While localised significant visual effects remain unavoidable for major linear infrastructure, standard lattice towers have been selected to promote visual permeability, and landscape mitigation is secured under **Application Document 7.8 Outline Landscape and Ecology Management Plan** and Requirements 4 and 8 of **Application Document 3.1 Draft** |

| Policy | East Drayton Neighbourhood Plan - Policy Requirement | Project Compliance |
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| | 5. Proposals for the development of renewable and low carbon sources of energy, particularly from community owned projects, will be supported provided that;<br>a) the developer has provided a thorough written analysis of the landscape impact satisfactorily demonstrating an ability to mitigate visual, noise, dust, smell and reflected light intrusion,<br>b) meaningful early consultation has been undertaken in accordance with the Key Principle in this Neighbourhood Plan and appropriate adjustments made accordingly,<br>c) it can be demonstrated that there will be no significant adverse impacts upon residents' living conditions, amenity, health, and quality of life or that any such impacts can be made acceptable during construction, operation, and decommissioning of installations,<br>d) there is a biodiversity net gain supported by a 30 year management plan to ensure this biodiversity benefit remains (in accordance with the most up to date legislation),<br>e) designated and non-designated heritage assets are appropriately safeguarded,<br>f) the proposal considers in a proportionate manner their impact on areas of landscape sensitivity against the benefits from the scheme,<br>g) supporting information shows how the surrounding environment will be protected and how full site restoration to an acceptable state (in accordance with BDC Policy ST49) will be achieved when production ceases. | **Development Consent Order**. In accordance with NPS EN-1 (Paragraph 4.2.28), the substantial urgent national need outweighs localised landscape impacts<br>• **Consultation and Stakeholder Engagement (Clause 5b**): Siting and design development have been shaped by extensive early and statutory consultation, as detailed in **Application Document 5.1 Consultation Report**, demonstrating compliance with the Planning Act 2008 and responsive alignment adjustments across the route.<br>• **Residential Amenity, Health, and Environmental Protection (Clause 5a, 5c, 5g):** Construction impacts (noise, vibration, dust, and lighting) are strictly controlled via **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**, including commitments GG16, GG17, and GG21 (low-luminance, directional lighting avoiding glare). Operational noise and electromagnetic fields (EMF) have been assessed in **Application Document 6.14 Environmental Statement Chapter 14 Noise and Vibration** and **Application Document 7.11 Electric and Magnetic Field Compliance Report** confirming compliance with UK/ICNIRP health guidelines. All temporary working areas will be fully reinstated to agricultural use upon completion.<br>• **Biodiversity Net Gain and 30-Year Management (Clause 5d**): The Project is committed to delivering at least 10% Biodiversity Net Gain using the Statutory Biodiversity Metric, as reported in **Application Document 7.1 Biodiversity Net Gain Report**. Delivery, maintenance, and monitoring over a 30-year period are secured through the **Outline Landscape and Ecology Management Plan Application Document 7.8** and Requirement 8 of **Application Document 3.1 Draft Development Consent Order**.<br>• **Safeguarding Cultural Heritage (Clause 5e)**: Siting avoids direct physical impacts on any designated or non-designated heritage asset (including the Grade I listed Church of St Peter, the Conservation Area, and NDHAs shown on Maps 9a, 9b, and 9c), as evaluated in **Application Document 6.10 Environmental Statement Chapter 10 Cultural Heritage)**. Less than substantial setting harm is outweighed by CNP public benefits, and buried archaeology is safeguarded by record via **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**.<br>The Project enables the delivery of low-carbon energy, protects local amenity, delivers measurable net gain, and accords with the criteria and principles of Policy 11. |

# 3. References


CL:AIRE. (2011). *The Definition of Waste: Development Industry Code of Practice.* Retrieved from https://claire.co.uk/projects-and-initiatives/dow-cop/framework-and-guidance/dow-cop-main-document.html

Defra. (2025). *Environmental Improvement Plan 2025.* Retrieved from GOV.UK: https://www.gov.uk/government/publications/environmental-improvement-plan-2025

Defra. (2026). *Statutory Biodiversity Metric - Calculation Tool*. Retrieved from GOV.UK: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides

Department for Communities and Local Government. (2014). *Planning Practice Guidance - Travel Plans, Transport Assessments and Statements*. Retrieved from GOV.UK: https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements

Department for Energy Security and Net Zero. (2025). *National Policy Statement for Electricity Networks Infrastructure (EN-5).* Retrieved from GOV.UK: https://assets.publishing.service.gov.uk/media/695d12e1b5c46330350ed9a1/national-policy-statement-for-electricity-networks-infrastructure-en-5-web-accessible.pdf

Department for Energy Security and Net Zero. (2025). *National Policy Statement for Renewable Energy Infrastructure (EN-3).* Retrieved from GOV.UK: https://assets.publishing.service.gov.uk/media/695d1368b5c46330350ed9a2/national-policy-statement-for-renewable-energy-infrastructure-en-3-web-accessible.pdf

Department for Energy Security and Net Zero. (2025). *Overarching National Policy Statement for Energy (EN-1).* Retrieved from GOV.UK: https://assets.publishing.service.gov.uk/media/695d1015f41883f4e50ed9ab/overarching-national-policy-statement-for-energy-en-1-web-accessible.pdf

Department for Environment, Food and Rural Affairs. (2022). *UK Climate Change Risk Assessment 2022.* Retrieved from https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2022

Department for Environment, Food and Rural Affairs. (2023). *Environmental Improvement Plan 2023.* Retrieved from https://www.gov.uk/government/publications/environmental-improvement-plan

Grid, N. (2022, April). *Our Approach to Consenting.* Retrieved from https://www.nationalgrid.com/document/342336/download

HM Government. (1989). *Electricity Act 1989.* Retrieved from https://www.legislation.gov.uk/ukpga/1989/29/contents

HM Government. (1990). *Environmental Protection Act 1990.* Retrieved from https://www.legislation.gov.uk/ukpga/1990/43

HM Government. (2001). *The Control of Pollution (Oil Storage) (England) Regulations 2001.* Retrieved from legislation.gov.uk: https://www.legislation.gov.uk/uksi/2001/2954/contents

HM Government. (2008). *Planning Act 2008.* Retrieved from https://www.legislation.gov.uk/ukpga/2008/29/contents

HM Government. (2017). *The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017*. Retrieved June 2025, from https://www.legislation.gov.uk/uksi/2017/572/contents

HM Government. (2017). *The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.* Retrieved from https://www.legislation.gov.uk/uksi/2017/407/contents

HM Government. (2021). *Environment Act 2021.* Retrieved from legislation.gov.uk: https://www.legislation.gov.uk/ukpga/2021/30/contents

HM Government. (2021). *Environment Act 2021.* Retrieved from https://www.legislation.gov.uk/ukpga/2021/30/contents

National Infrastructure Commission. (2020). *Design Principles for National Infrastructure.*

Natural England. (2026). *Notice of the Yorkshire Wolds Area of Outstanding Natural Beauty (Designation) Order 2026.* Retrieved from https://www.gov.uk/government/publications/yorkshire-wolds-area-of-

outstanding-natural-beauty-proposed-designation/notice-of-the-yorkshire-wolds-area-of-outstanding-natural-beauty-designation-order-2026

Nottinghamshire County Council. (2025). *Nottinghamshire and Nottingham Local Nature Recovery Strategy.* Retrieved from https://www.nottinghamshire.gov.uk/planning-and-environment/countryside-and-green-spaces/local-nature-recovery-strategy-for-nottinghamshire

Planning Inspectorate. (2018). *Advice Note 9: Rochdale Envelope.*

Planning Inspectorate. (2024). *Nationally Significant Infrastructure Projects: Advice on Good Design.* Retrieved from https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-good-design

Planning Inspectorate. (2025). *Nationally Significant Infrastructure Projects: Advice on Preparing Applications for Linear Projects.* Retrieved from https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-preparing-applications-for-linear-projects

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