The Great Grid Upgrade

North Humber to High Marnham

NHHM-AEC-CNS-REP-0026

North Humber to High Marnham

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Document 6.5.A3 Environmental Statement Appendix 5.3 - Scoping Response Tables

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1. Response to Scoping Opinion

1.1 Introduction

1.1.1 This appendix to **Application Document 6.5 Chapter 5 Environmental Impact Assessment Approach and Methodology** sets out the responses to comments provided by prescribed consultees at scoping.

1.1.2 A Scoping Report for the Project was issued to the Planning Inspectorate on 21 August 2023 (**Application Document 6.5.A1 Appendix 5.1 Environmental Impact Assessment (EIA) Scoping Report**) and a Scoping Opinion was received from the Planning Inspectorate on behalf of the Secretary of State (SoS) for the Department for Energy Security and Net Zero on 29 September 2023 (**Application Document 6.5.A2 Appendix 5.2 Scoping Opinion**). This appendix provides comment by comment responses to the feedback related to the scope of the assessment made by the prescribed consultees at scoping stage and how each comment has been considered in the application for Development Consent. The responses to the Planning Inspectorate's core scoping opinion comments are excluded from this appendix as they are presented within each relevant topic chapter in the Environmental Statement (ES).

1.1.3 The scope and extent of the study area considered in the Scoping Report was sufficiently broad to accommodate the DCO Order Limits. Where methodologies have been updated since the Scoping Opinion was sought, for example due to changes in guidance or legislation, the most recent methodology has been implemented. More information on how the Applicant has responded to the Scoping Opinion is set out in each chapter of the ES where relevant in **Application Documents 6.1** to **6.21**.

1.1.4 Table 1.1 to Table 1.31 provide the Applicant's responses to comments made by the prescribed consultees

1.1.5 Only comments relating to the scope of the ES have been included in Table 1.1 to Table 1.31. Where comments were received on matters unrelated to the scope, these are addressed in Appendix G of the Non-Statutory Consultation Feedback Report within **Application Document 5.1 Consultation Report**.

1.2 Blacktoft Parish Council

Table 1.1 – Blacktoft Parish Council

Blacktoft Parish Council Comment	How this comment has been addressed.
Blacktoft parish is a large mainly agricultural parish with a small population on the north bank of the river Ouse - at the point where the river Trent, The Humber and the river Ouse all meet. The neighbouring parish along the river bank towards the North Sea is Broomfleet. There are 250 electors on the electoral roll. A large flat area of land with a small population. Otherwise known as a flood plain.	National Grid notes this feedback.
In 2013 the tidal surge hit this riverbank and Blacktoft parish was flooded badly - at least 75% land flooded and a very high percentage of riverside and some inland properties were flooded - 60% approximately - with damage and loss of livestock. The engineered riverbank held but in some places did break. These identified places historically caused by manmade intervention - repairs, building work etc. The spectre of flooding is always with the residents of Blacktoft parish. Blacktoft Parish Council would like to know that if a pylon or perhaps pylons are to be placed on or as near to the riverbank to cause a problem - that everything will be done to put the land back to the highest engineered standard. The large pylon currently takes cable across the river at Yokefleet and Ousefleet (south bank). Placing a pylon - larger or smaller than the current one(s) - would impact on residents of the settlement of Yokefleet.	Construction exclusion zones have been applied in the design of the Project which have considered set back distances from main rivers and flood defences. These zones are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**. Potential effects on residential receptors are set out in the relevant topic chapters of the ES.
The line of pylons coming down off the Yorkshire Wolds onto the flood plain is visible from every household in the parish. The line of pylons going over the river and across the south side to the Lincolnshire Wolds will also be visible to residents. It has to be agreed that not everyone will be pleased to have such 'industrialised' items placed in full view. The parish council would like to see some consideration	Through routeing and siting, National Grid has sought to reduce, as far as practicable, potential impacts on visual receptors. A visual assessment has been carried out as part of the ES Impacts on visual receptors, including the communities between the escarpment of the Yorkshire Wolds and the River Ouse including Blacktoft, are considered within **Application Document 6.7 Chapter 7 Visual**. In

Blacktoft Parish Council Comment	How this comment has been addressed.
given to the visual impact of a second line of pylons. It is also understood that the capacity needed will not be met by the siting of a second line of pylons and that perhaps in a few years time a third line will be needed to be sited. Blacktoft Parish Council would like to know what the capacity will be with a second line of pylons for, say, 2040-2050.	this section, the proposed overhead line has been routed in parallel with the existing 4ZQ overhead line to reduce further spread of infrastructure and in particular on the escarpment which is visible from a wide area. In addition to being parallel, the siting of individual pylons has considered the locations and spans of the existing overhead line, with synchronising of pylon locations and types where possible to create a coherent appearance. The need for the Project is set out in **Application Document 7.17 Strategic Options Report Including Needs Case**.
The parish council would also like to see some consideration given to the design of the pylons and the placement of the pylons. With the pylons being sited away from residents and their homes. There are also some concerns regarding how the line will be crossed to change direction.	The design of the proposed overhead line has considered residential properties, how these have been taken into account at each stage of the Project's design is set out within the following: • **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.** In this section, the proposed overhead line has been routed in parallel with the existing 4ZQ overhead line to reduce further spread of infrastructure and in particular on the escarpment which is visible from a wide area. In addition to being parallel, the siting of individual pylons has considered the locations and spans of the existing overhead line, with synchronising of pylon locations and types where possible to create a coherent appearance.
Over the years there has also been some bird strike incidents. Some documented and some not. Perhaps there have been more but they have never been documented or reported to the parish council. The R	Potential effects from the Project on ornithological receptors is set out in **Application Document 6.9 Chapter 9 Ornithology**. This has considered the RSPB reserve and SSSI.

Blacktoft Parish Council Comment	How this comment has been addressed.
S P B Bird Sanctury on the south bank - Blacktoft Sands - is a very important site for wild birds, both resident and migratory. The whole of this riverbank area is part of a Site of Special Scientific Interest (S S S I) and others. Blacktoft Parish Council would like to see every effort be made to ensure there is no detrimental impact on the bird sanctury any the S S S I interests.	
There is also concern that farm land will be 'lost' to more pylons being placed in the parish. It will be very concerning should a third line of pylons be needed in the future. As this is a large agricultural parish the parish council would like to have all comments, questions and suggestions put to the NATIONAL GRID regarding this proposal taken seriously and with the best outcome for the parish, its farmers and residents. On the ground and financially. Everyone in Blacktoft parish (as in all parishes) will be affected by a second (or third) line of pylons and as such there should be some sort of local/community based compensation scheme for the benefit of the local communities.	Potential effects on agricultural land including best and most versatile (BMV) is set out in **Application Document 6.13 Chapter 13 Agriculture and Soils**. National Grid welcome the Government's Guidance on Community Funds for Transmission Infrastructure. This guidance offers a clear framework and will enable National Grid to work with communities and deliver meaningful, long-term, social and economic benefits through strategic investment. The community benefit fund on North Humber to High Marnham could be in the region of around £18 million. Any funding would be available after the Project is granted development consent and construction work has started. National Grid has carried out a community benefits survey to ask for views on how any future funding could be spent.
Then there is the question constantly being asked - 'Why can't the cable be channelled underground and under water?' Another question is and so far has not been answered by anyone representing NATIONAL GRID - 'Why is there such a divergence in the proposed line at Oxmardyke in Blacktoft parish?'	Undergrounding was considered as part of the evolution of Project. The reasons for the technology type selected are set out in: • **Application Document 7.18 Corridor and Preliminary Routeing and Siting Study;** • **Application Document 7.19 Supplementary Corridor and Routeing Report; and** • **Application Document 7.20 Design Development Report – 2025;** The proposed overhead line has been routed in close parallel with the excising 4ZQ overhead line through the parish of Blacktoft. In addition to being parallel, the siting of individual pylons has considered the locations and spans of the existing overhead line, with synchronising

Blacktoft Parish Council Comment	How this comment has been addressed.
	of pylon locations and types where possible to create a coherent appearance. The proposed overhead line deviates from close parallel as it crosses the River Ouse to avoid oversailing residential properties and Hall Garth Scheduled Monument.
The impact of construction of these pylons will be immense on this small population and on farming activities. It would no doubt impact on the local wildlife too. The parish is a quiet, peaceful and very beautiful area and is important to residents and visitors alike for its wellbeing properties. If this proposal for more pylons does go ahead it is hoped it will be with the interests of residents and farmers and businesses in mind.	The potential effects of the construction of the Project have been assessed within the ES and set out in **Application Documents 6.6 to 6.21**.

1.3 Broomfleet Parish Council

Table 1.2 – Broomfleet Parish Council

Comment	National Grid Response
Namely the concerns regarding the local wildlife, The Humber Estuary on the North bank trying to get the status as a UNESCO East Atlantic Highway site, also the proximity to the village which already has Pylons situated very closely.	**Application Document 6.9 Chapter 9 Ornithology** assesses the effects of the Project on ornithology (birds).
The landscape and habitat through which the possible transmission line will pass is highly regarded and contains several protected areas and other sites of historic interest.	The effects of the Project on landscape including designated landscapes and landscape character is presented in **Application Document 6.6 Chapter 6 Landscape**. The effects of the project on heritage assets designated and non-designated as well as buried archaeology is presented in **Application Document 6.10 Chapter 10 Cultural Heritage**.
The area is a key part of the Yorkshire Wolds and Natural England is intending to designate part of this as an area of AONB.	In relation to the Yorkshire Wolds AONB, it is noted that on 4 February 2026, Natural England issued notice of intention to 'make' the designation Order. The Draft Yorkshire Wolds AONB (Designation) Order 2026 (Natural England, 2026) proposes an area slightly larger than the Provisional Candidate Area originally published for consultation; the area expanded in response to consultation responses. This means that the distance between the proposed boundary to the nearest point of the Limits of Deviation (LoD) is 11.4 km. At this distance, the special qualities and statutory purposes of the AONB are unlikely to be significantly affected by the Project, and no further assessment has been undertaken.
The emerging preferred corridor also runs alongside a number of conservation areas whose character would be altered significantly by the addition of new pylons, in conflict with Holford rule number 6 which states in flat, sparsely planted areas like the Humberhead	Through routeing and siting, National Grid has sought to reduce, as far as practicable, potential impacts on visual receptors. In this section, the proposed overhead line has been routed in close parallel with the existing 4ZQ overhead line to reduce further spread of

Comment	National Grid Response
levels National Charter Area (NCA), there is a need to avoid a concentration of wires creating a 'WIRESCAPE'	infrastructure and in particular on the escarpment which is visible from a wide area. In addition to being parallel, the siting of individual pylons has considered the locations and spans of the existing overhead line, with synchronising of pylon locations and types where possible to create a coherent appearance. The effects of the Project on conservation areas are presented in **Application Document 6.10 Chapter 10 Cultural Heritage**
Dramatic negative impact on visual amenity of this area of the Yorkshire Wolds. The additional pylons would be a jarring intrusion marring the unspoiled charm of this beautiful green space, with an industrial corridor of steel.	Effects of the Project on visual amenity are presented in **Application Document 6.7 Chapter 7 Visual**.
The whole section of corridor, especially Broomfleet, should be underground, extreme North or better still off shore via an integrated grid.	National Grid has carefully considered the feedback received, the alternatives available, and other factors including our duties and obligations. These duties include balancing the need to be economic and efficient, which includes keeping costs down in the interests of bill-paying consumers, with a duty to have regard to preserving amenity, which includes the natural environment, cultural heritage, landscape and visual quality. National Policy Statement (NPS) EN-5 (Department for Energy Security & Net Zero, 2025) makes it clear that the Government expects overhead lines to be appropriate in most instances, although it recognises that there may be, at particularly sensitive locations such as National Landscape (previously known as Areas of Outstanding Natural Beauty (AONB)), potential adverse landscape and visual impacts of an overhead line which may make it unacceptable in planning terms, taking account of the specific local environment and context. In this context, it is considered there are insufficient policy justifications to use underground cabling in this location.
Migration of birds • The Humber region is also part of the UNESCO East Atlantic highway, a primary migration route for birds over Western Europe	Effects in relation to birds are provided in **Application Document 6.9 Chapter 9 Ornithology**. **Application Document 6.9.A3 Environmental Statement Appendix 9.3 Flight Activity**

Comment	National Grid Response
and there are concerns that the lines could become an ecological trap for migrating birds. • The East Coast Wetland, including the Humber Estuary is also one of the seven sites around the UK being backed by the Government to win World Heritage Status from UNESCO. • The UNESCO Flyway is a coastal network of wetlands from RSPB Blacktoft Sands on the Humber Estuary to RSPB Wallasea Island, Essex. It is visited by millions of birds annually. World Heritage are in the process of making the Humber a World Heritage Site - this has been put forward by the government • Farmers are given funds for feed and hedges to support the migration Bird casualties - due to cables in the flight path, at present geese & swans often fly into the cables. Doubling the number of cable plus the new cables would be thicker and the possible emitting a higher magnetic field - could impact the flight path casualties further	**Assessment** sets out information with regards to flights at risk in relation to collision which has informed the requirement for bird diverters on sections of the proposed overhead line.
Water Levels • Land searches show that the area around Broomfleet is a flood plain with links to Market Weighton Canal through watercourses and dykes • Fields are used as water soaks • Possible impacts of flooding in the village due to climate change if flood plains & water soaks are compromised	**Application Document 6.11 Chapter 11 Water Environment** sets out the effects of the Project on flood risk, this is supported by **Application Document 7.13 Flood Risk Assessment**.
Impact on nature • Local bird life, birds of prey, owls, geese, swans, deer etc could all be materially impacted • Natural England is intending to designate part of this as an area of AONB.	Effects of the Project on ecology are presented in **Application Document 6.8 Chapter 8 Ecology**. Effects of the Project on birds are presented in **Application Document 6.9 Chapter 9 Ornithology**. With regards to the AONB please see the response provided above.

Comment	National Grid Response
• Negative impact on wildlife - local bird life such as Marsh Harriers, Red Kites and the thousands of migrating geese to name but a few.	
Historic area of interest • Roman area of historical interest • Provence Farm was once a hamlet, and artefacts have been found around both it and Providence Farm, one of which dates back to Roman times and held the museum in Hull	The effects of the project on heritage assets designated and non-designated as well as buried archaeology is presented in **Application Document 6.10 Chapter 10 Cultural Heritage**.
Pennine Trail/visitors to the area • Impact to walkers & cyclists - both visually & the road/path infrastructure • Government green book states the impact on the environment needs to be minimised - alternate such as offshore routes should be evaluated	Impacts to the visual amenity of walkers and cyclists are presented in **Application Document 6.7 Chapter 7 Visual**. Impacts to walkers and cyclists with regards to recreation and amenity are presented in **Application Document 6.17 Chapter 17 Socio-economics, Recreation and Tourism**. Impacts to walkers and cyclists in terms of journey length and delay are presented in **Application Document 6.14 Chapter 14 Traffic and Transport**. Intra-project cumulative effects on walkers and cyclists are presented in **Application Document 6.20 Chapter 20 Intra-project Cumulative Effects**.
Possible Health Issues • If overhead pylons go ahead the cables will be thicker and possibly increasing the EMF • • Possible negative impact on health due to an increased EMF - there is growing evidence of adverse effects of EMF on health. • Surrounding the village or running further pylons in close parallel proximity would further increase the level of EMF on the village and therefore increase the risk of adverse health issues. • • No current/recent government studies on the effect on the community from EMF	**Application Document 7.11 Electric and Magnetic Field Compliance Report** has been provided with the application for Development Consent.

Comment	National Grid Response
• The last EMF study was completed in 2013, an up to date study is required of current EMF levels in village - the village needs to lobby MP David Davis to ensure this study is completed before any further changes are made • Independent studies have been conducted in Italy and other countries similar concerns around the impact of EMF and child leukaemia • Consider the Question: Do we believe we have disproportionate health issues in the village caused by EMF and would the increase put us under further risk?	
Disruption (both during construction and longer term) • Farms and businesses for the whole of the proposed line not just Broomfleet could cause a detrimental effect on quantities of crops grown during this time could feed into impact prices across the food chain	Effects from the Project on agricultural land are presented in **Application Document 6.13 Chapter 13 Agriculture and Soils**. Effects from the Project on business and the local economy are presented in **Application Document 6.17 Chapter 17 Socio-economics, Recreation and Tourism**.
Infrastructure impact during the construction phase • Level of traffic increase on roads which are single track • Traffic has already increased with National Grid assessing pylons - issue with limited passing places • Roads are used by farmers, walkers, cyclists, runners and the movement of sheep	Effects form the Project on the road network from construction traffic are presented in **Application Document 6.14 Chapter 14 Traffic and Transport**.
Underground Cables - the unanimous preference expressed was that if transmission lines had to come close to the village and surrounding settlements, there they should be underground to help safeguard the visual amenity of the surrounding countryside	A line swap is proposed at the top of Woodale and the proposed overhead line is routed in close parallel with the existing 4ZQ overhead line to the north of Broomfleet keeping the pylons together on one side of the settlement.

1.4 Canals and Rivers Trust

Table 1.3 – Canals and Rivers Trust

Canals and Rivers Trust Comment	National Grid Response
Thank you for your consultation on the Environmental Impact Assessment Scoping report, which relates to the proposed North Humber to High Marnham Project to re-enforce the Electricity Transmission Network, which includes works to install a new 400 kV OHL (overhead power line) route, approximately 90 km in length and works to reconfigure a section of the existing 400 kV OHL to the east of Crowle and west of Keadby Power Station.	Noted, no further response required.
The Canal & River Trust are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation.	Noted, no further response required.
The Trust are landowner and Navigation Authority for both the Stainforth & Keadby Canal and the Chesterfield Canal. The waterways are included within the development boundary of the project, and we understand are proposed to be crossed by the new cable route. The Stainforth & Keadby Canal is classified as a freight waterway, and can accommodate large craft.	Noted, no further response required.
Having reviewed the Scoping Document, we wish to raise the following comments.	Noted, no further response required.

Canals and Rivers Trust Comment	National Grid Response
The Stainforth & Keadby and Chesterfield Canals both run on an almost east-west alignment across the line of the proposed overhead power line. As landowner/operator of the canal the Trust wish to see any potential impacts on the canal and its users fully identified and addressed within the Environmental Statement.	**Application Document 6.17 Chapter 17 Socio-economics, Recreation and Tourism** includes an assessment of the likely effects on the Stainforth & Keadby and Chesterfield Canals, including effects on angling activities, nearby moorings, and motorised and non-motorised navigation. Visual amenity effects on the users of both canals have been assessed in **Application Document 6.7 Chapter 7 Visual**. Consideration of the extent of temporary stopping up of the rights of navigation and the safety of users is set out in **Application 7.22 Navigational Risk Assessment**. Measures to manage the stopping up of the rights of navigation are set out in **Application Document 7.6 Outline Public Rights of Way Management Plan**.
The Scoping Report provides information on the likely nature and form of the proposed development and identifies areas of potential impacts. The proposed methodologies identified in the report appear to be broadly appropriate.	Noted, no further response required.
Underground Works	
A unique attraction of our waterways are based on its visual amenity value, in addition to its significance as a heritage and wildlife corridor and as a sustainable transport route. It is essential that the amenity value of our canals are protected and that no development takes place that may adversely affect the experience of waterway users. The canal towpaths provides a popular route for leisure and recreation, and provide a public right of way and cycle route.	Through routeing and siting, National Grid has sought to reduce, as far as practicable, potential impacts on visual receptors including users of canals. Both canals are crossed perpendicularly to avoid running along the canal to reduce the opportunity for users to have close proximity views. The crossing of the Stainforth and Keadby Canal is located where views are already influenced by other energy infrastructure including wind turbines and Keadby Power Station. For the Chesterfield Canal, the proposed overhead line crosses in a location which benefits from some existing vegetation along the north bank of the canal which screens views north. This has been supplemented with mitigation planting on the south bank of the canal

Canals and Rivers Trust Comment	National Grid Response
	to filter views where users would pass beneath the proposed overhead line. Visual amenity effects on the users of both canals have been assessed in **Application Document 6.7 Chapter 7 Visual**. **Application Document 6.17 Chapter 17 Socio-economics, Recreation and Tourism** includes an assessment of the likely effects on the Stainforth & Keadby and Chesterfield Canals, including effects on angling activities, nearby moorings, and motorised and non-motorised navigation.
We understand from the Scoping report that the majority of works will take place above ground, which would include above-ground crossings of the canal network. The main exception would be in and around Keadby Power Station, where undergrounding is proposed to cross an existing cable.	At the scoping stage the design of the ZDA crossing was still under consideration. This included consideration of an option to underground a section of the existing ZDA overhead line. The crossing technology selected was to use a 'diamond duck under' which is explained in **Application Document 6.4 Chapter 4 Description of the Project.** As such no undergrounding works of the existing ZDA overhead line are proposed.
We would request that the nature of the works in relation to the canal should be provided as part of the submission so that any impact on the structure of the Stainforth & Keadby Canal, which could lie in close proximity, can be considered.	A description of the Project and how it would be constructed is provided in **Application Document 6.4 Chapter 4 Description of the Project**.
Paragraph 4.2.38 highlights that undergrounding works will be considered in some locations where necessary to mitigate an environmental effect that cannot be reduced to an appropriate level through other measures.	No areas of undergrounding of the proposed overhead line have been identified as being required.
We request that the Environmental Report should provide further clarity about where the line will be undergrounded elsewhere. Notably, we request that a full assessment should be provided with regards to the amenity impacts of an overhead crossing of both the Stainforth & Keadby and Chesterfield Canals and request that this should consider whether the benefits of undergrounding the particular section of the line across our waterways could outweigh the harm of providing the line above ground.	National Grid has carefully considered the feedback received, the alternatives available, and other factors including our duties and obligations. These duties include balancing the need to be economic and efficient, which includes keeping costs down in the interests of bill-paying consumers, with a duty to have regard to preserving amenity, which includes the natural environment, cultural heritage, landscape and visual quality. National Policy Statement (NPS) EN-5 (Department for Energy Security & Net Zero, 2025) makes it clear that

Canals and Rivers Trust Comment	National Grid Response
	the Government expects overhead lines to be appropriate in most instances, although it recognises that there may be, at particularly sensitive locations such as National Landscape (previously known as Areas of Outstanding Natural Beauty (AONB)), potential adverse landscape and visual impacts of an overhead line which may make it unacceptable in planning terms, taking account of the specific local environment and context. In this context, it is considered there are insufficient policy justifications to use underground cabling in this location. A visual assessment has been carried out as part of the ES. Impacts on users of the canals, including the Stainforth and Keadby Canal and Chesterfield Canal, are considered within **Application Document 6.7 Chapter 7 Visual**. Viewpoint locations on each canal have been considered and photomontages produced to illustrate **Application Document 7.16 Photomontages**. **Application Document 6.17 Chapter 17 Socio-economics, Recreation and Tourism** includes an assessment of the likely effects on the Stainforth & Keadby and Chesterfield Canals, including effects on angling activities, nearby moorings, and motorised and non-motorised navigation.
Due to the designation of a canal as a Site of Special Scientific Interest (SSSI), proximity to Heritage Assets, absence of tree coverage and absence of existing nearby cable or pipe crossings, we anticipate that the Chesterfield Canal would be especially sensitivity to the impact of a cable crossing for reasons discussed below	Noted no undergrounding is proposed at the Chesterfield Canal.
Landscape and Visual	
As above ground installation would cross our network in two locations, which will carry both long term landscape/visual impacts and disturbance implications to facilitate construction. Indeed, paragraph 7.8.2 identifies that there visual receptors accepted by the project would include recreational receptors on the waterways including rivers and canals.	Potential effects on the visual amenity of cabal users is set out in **Application Document 6.7 Chapter 7 Visual.**

Canals and Rivers Trust Comment	National Grid Response
Table 7.6 highlights that the Environmental Statement will include an assessment of the impact of construction and operation works on people using Public Rights of Way (PRoW) and waterways (within 3 km of the Project), which we understand will include an assessment of our network.	The ES has included an assessment of the impact of construction and operation on Public Rights of Way (PRoW) and waterways in **Application Document 6.7 Chapter 7 Visual** and **Application Document 6.17 Chapter 17 Socio-economics, Recreation and Tourism**. The study areas applied to each assessment is set out in section 4 of each chapter.
The Scoping Report highlights that the design of the new project will seek to accord with the aims of National Policy Statement EN-1 and EN-5 through the adoption of the Holford Rules and Horlock Rules.	**Application Document 5.5 Planning Statement** and **Application Document 5.6 Policy Accordance Tables** set out how the Project accords with policy.
We with to highlight that the nature of the landscape next to our waterways, which is flat, with limited tree cover, would limit the opportunity to adopt certain parts of the Holford Rules concerning cable routing. For example, rule 4 of the Holford Rules requires above ground cable routes to choose tree and hill backgrounds, whilst rule 5 seeks cable routes to prefer open valleys with woods to limit the apparent scale and height of new cable routes. The landscape next both canals would not allow for the adoption of either of these rules.	The Holford Rules are guidance for the routeing of overhead lines and are broad enough to guide routeing in any type of landscape. The Holford Rules do not 'require' but are guiding principles only. It is not always possible to follow all the rules, with the requirements of individual projects needing overhead lines that pass through a variety of landscapes containing a variety of existing features including existing overhead lines.
Consideration should be given with the Environmental Report specifically as to the visual impact of the new crossings of our network where the local landscape does not provide for easy visual mitigation of the works. Specific mitigation should be identified, especially next to the Chesterfield canal, to ensure that the visual impact on the landscape in this location is visually acceptable. The potential for undergrounding works should be considered as one option.	Mitigation for visual receptors on and adjacent to canal has been considered in the assessment and proposals outlined in **Application Document 6.7 Chapter 7 Visual** and **Application Document 7.8 Outline Landscape and Ecology Management Plan**. Mitigation planting has been proposed adjacent to the Chesterfield Canal to reduce the visual effects of views of the proposed overhead line, as shown in the photomontage for viewpoint E-06a presented in **Application Document 7.16 Photomontages**. Photomontages have been provided at Year 1 and Year 15 to show the effect planting would have on this location. It is acknowledged in **Application Document 6.7 Chapter 7 Visual** that a localised moderate adverse (significant) effect would remain, as the planting would not only screen the proposed overhead line, but would also enclose the longer distance views. Planting has been limited to a short section of the

Canals and Rivers Trust Comment	National Grid Response
	canal to retain open views elsewhere along its length, where the proposed overhead line would not be as prominent. The potential for localised undergrounding has been considered as part of the Project's design. National Policy Statement (NPS) EN-5 (Department for Energy Security & Net Zero, 2025) makes clear that "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 Parks, The Broads, or Areas of Outstanding Natural Beauty)". EN-5 also confirms that widespread and significant adverse landscape and/or visual impacts in other locations may also justify the use of undergrounding. National Grid has a statutory duty to develop proposals that are economic and efficient. No widespread and significant adverse landscape and/or visual impacts have been assessed in this location, significant effects are limited to a short stretch of the canal. This conclusion has helped inform the design progression to route overhead.
Canal users would pass the position of new crossings at a relatively low speed, and would be susceptible to changes to the local landscape. **We request that the Visual Impact Assessment proposed should include an assessment of the proposed changes to the landscape at both canal crossing locations**. Within Appendix 6, table 6.A.22 provides indicators of landscape receptor susceptibility. The list appears broadly appropriate. We wish to highlight that our canals have local heritage value (due to their age and association with historic industrial development in the areas they run), as well providing spaces of recreational and ecological/biodiversity value (including the SSSI designation for the Chesterfield Canal). These highlight that the canals have High to Very High landscape value, and should be considered accordingly.	A visual assessment has been carried out as part of the ES Impacts on users of the canals, including the Stainforth and Keadby Canal and Chesterfield Canal, are considered within **Application Document 6.7 Chapter 7 Visual**. Viewpoint locations on each canal have been considered and photomontages produced to illustrate the Project are presented in **Application Document 7.16 Photomontages**. The value associated with views from the canals vary by location. The value of the views from the Stainforth and Keadby Canal are considered to be of medium value as views are influenced by wind turbines at Tween Bridge Moor and Keady Wind Farms and the existing overhead lines in the Trent Valley. The value of views from the Chesterfield Canal are considered to be higher. Views along the waterway tend to be scenic with few detractors. The existing overhead line only begins to influence views once the canal passes

Canals and Rivers Trust Comment	National Grid Response
	Misterton and heads towards the River Trent, where it finishes under the two existing 4TM and ZDA 400 kV overhead lines at East Stockwith. The value of views is considered to be high. Potential effects on the SSSI designation are set out in **Application Document 6.8 Chapter 8 Ecology**. Potential effects on the Chesterfield Canal as a non-designated heritage asset are set out in **Application Document 6.10 Chapter 10 Cultural Heritage**.
With respect to the Visual Assessment described in Chapter 7, **we request that our canals (notably at the position of any proposed crossing) should be included as viewpoints within the associated assessment**. This would be necessary to ensure that the impact on our network and its associated users can be fully made. Identification of heritage assets, waymarked walks, and other attractions along the canal is also crucial in assessing the visual impact assessment on the canal's amenity value, significance and setting.	Viewpoint locations on each canal have been considered as part of **Application Document 6.7 Chapter 7 Visual** with baseline photos, wirelines and assessment presented in **Application Document 6.7.A2 Appendix 6.3 Viewpoint Assessment**. The following viewpoints are relevant to canals. Stainforth and Keadby Canal: • VP C-03a View north from Stainforth and Keadby Canal; and • VP C-03b View northeast from Stainforth and Keadby Canal. Chesterfield Canal: • VP E-06a View south from the Chesterfield Canal; and • VP E-06b View southwest from the Chesterfield Canal. Photomontages produced to illustrate the Project are presented in **Application Document 7.16 Photomontages**. Viewpoints C-03a, C-03b and E-06a listed above have been taken forward as photomontages.
The scoping report states that lighting impacts are will be assessed. There is a risk that lighting near the our network could distract boaters at dusk. We therefore request that more clarity should be provided with regards to the location of lighting and potential impact on our waterways as part of the assessment.	An assessment of night-time lighting is included in **Application Document 6.6.A3 Appendix 6.3 Landscape Baseline** and **Assessment and Application Document 6.7.A3 Viewpoint Assessment** (Part 3 for the Stainforth and Keadby Canal and Part 5 for the Chesterfield Canal), although given the temporary nature of the works which may require night-time lighting, this does not result in significant landscape or visual effects in its own right. Measures

Canals and Rivers Trust Comment	National Grid Response
	relevant to the control and management of impacts 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**. Commitment GG23 states that construction lighting will be directional and minimised where possible.
Ecology and Biodiversity	
Both the Chesterfield and Stainforth & Keadby Canals offer a potential habitat for waterborne species, potentially including amphibians, mammals (including otter), fish and waterborne plants. We understand that the Environmental Report will be supported with a study of biodiversity and habitats, and that the canals are is included in the study boundary.	Both the Chesterfield and Stainforth and Keadby Canals have been assessed in respect of biodiversity and habitat including for waterborne species, mammals (including otter), fish and waterborne plants. **Application Document 6.8 Chapter 8 Ecology** and **Application Document 6.9 Chapter 9 Ornithology** provides the assessment findings.
As identified within the submission a section of the Chesterfield Canal is a designated Site of Special Scientific Interest (SSSI) Although the canal is designated primarilty for aquatic wildlife, it is also important as a flight line for birds and bats. **Therefore, it must be ensured that any cable crossings have measures in place that reduce the chance of cable strikes by birds.** Additionally, any construction phase activities should be kept away from the canal corridor to minimise any disturbance to the corridor. Appropriate physical measures such as flight deflectors must be used to ensure that harm to birds as a result of colliding with the overhead line is minimised.	Potential effects on Chesterfield Canal SSSI have been assessed in section 8.9 of **Application Document 6.8 Chapter 8 Ecology**. The chapter provides details of any impacts to habitats in proximity to the Chesterfield Canal SSSI and mitigation measures that will be carried out to prevent residual significant effects on the SSSI. Effects in relation to birds using the canal as a flight line are provided in **Application Document 6.9 Chapter 9 Ornithology**. **Application Document 6.9.A3 Environmental Statement Appendix 9.3 Flight Activity Assessment** sets out information with regards to flights at risk in relation to collision which has informed the requirement for bird diverters on sections of the proposed overhead line. Measures that will be carried out to protect designated sites and habitats are detailed in **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.8 Outline Landscape and Ecology Management Plan**. The canal corridor will continue to be available to commuting and foraging bats during construction and operation of the Project,

Canals and Rivers Trust Comment	National Grid Response
	with measures put in place to restrict the potential for disturbance associated with lighting.
The Scoping Report highlights the key potential impacts from the works, which include habitat loss in proximity to the Chesterfield Canal SSSI. **We request that the report should include a full assessment of the extent of vegetation loss necessary, and any identified mitigation.**	Potential effects on Chesterfield Canal SSSI have been assessed in section 8.9 of **Application Document 6.8 Chapter 8 Ecology**. The chapter provides details of any impacts to habitats in proximity to the Chesterfield Canal SSSI and mitigation measures that will be carried out to prevent residual significant effects on the SSSI. Measures that will be carried out to protect designated sites and habitats are detailed in **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.8 Outline Landscape and Ecology Management Plan**
Should piling works be proposed for any pylons, we wish to highlight that such works can result in disturbance from vibration. As a result, we believe the impact should be included as part of the overall assessment.	Impacts of vibration from piling on aquatic receptors including fish are assessed in Application Document 6.8 Chapter 8 Ecology. The residual effect has been assessed as not significant with embedded mitigation secured through **Application Document 7.3 Register of Environmental Actions and Commitments** and **Application Document 7.2 Outline Code of Construction Practice**. Any piling activities would use non-percussive piling techniques where practical to limit disturbance, which would assist in allowing sounds to increase gradually, allowing fish in the immediate vicinity to swim away. **Application Document 7.3 Register of Environmental Actions and Commitments** contains specific measures relating to potential impacts from underwater noise from potential percussive piling activities and requires that noise from such activities will be controlled to be below the level at which the onset of behavioural disturbance in sensitive fish species would occur.
Cultural Heritage	
Due to their age and association with historic industrial development, our canal network does form a heritage asset, and impacts upon the	The canal network is considered a non-designated heritage asset and a feature of the historic landscape. There would be no permanent, physical impacts to the canals but potential impacts from temporary

Canals and Rivers Trust Comment	National Grid Response
value and setting of this asset should be considered as part of the Environmental Statement.	and permanent changes to their setting is considered in **Application Document 6.10 Chapter 10: Cultural Heritage**.
The proposed line also would lie in close proximity to several designated assets that lie in proximity to, or within to Chesterfield Canal. This includes Shaw Lane/Dunstan Farm to the north of Gringley Shaw Lock. Walkeringham Brickworks Chimney would also lie in close proximity to the indicative route, and forms a non-designate landmark feature whose setting could be impacted by the proposed power line.	Potential effects on designated heritage assets are set out in **Application Document 6.10 Chapter 10 Cultural Heritage**. This sets out the study area applied and which assets have been scoped into the assessment including the predicted residual effects on those assets.
The Vazon Sliding Railway Bridge is within the potential crossing area on the Stainforth & Keadby Canal. Although not a heritage asset, it is an unusual piece of innovative engineering that will likely be of interest to the journey of the canal, and could contribute presently to the local cultural heritage.	The Vazon Sliding Railway Bridge adjacent to Keadby Power Station is outside the study area for assessment of non-designated built heritage assets as defined in **Application Document 6.10 Chapter 10 Cultural Heritage**. The works associated with the Project in the vicinity of the bridge are reconductoring works on the existing overhead line. There will therefore be no change to the bridge's baseline visual character as a result of the Project.
Water Environment	
Works in proximity to our waterways have the potential to increase the risk of pollution to the River through the runoff of silt-laden deposits or the release of dust during construction. There is a significant risk of contamination through poor sediment management from exposed soils, with specific risks likely associated with excavation and piling works in proximity to our canals.	The potential for pollution of the water environment during construction of Project has been assessed within **Application Document 6.11 Environmental Statement Chapter 11 – Water Environment.** No likely significant effects have been assessed, given the range of management and control measures that would be implemented to control surface water runoff from exposed soils and other construction working areas. These are described in **Application Document 7.3 Register of Environmental Actions and Commitments** and are secured through Schedule 2 of **Application Document 3.1 Draft Development Consent Order**.
We understand that control measures will be incorporated as part of a Construction Environmental Management Plan, as opposed to being assessed within the Environmental Statement. In principle, the Trust	As noted above, control measures are secured and have been accounted for in the assessment presented within **Application**

Canals and Rivers Trust Comment	National Grid Response
has no objection to this approach, but requested that we are consulted upon the final details prior to their approval.	**Document 6.11 Environmental Statement Chapter 11 – Water Environment.**
We understand that no direct discharge of water is proposed to our network. Should any discharge be proposed, then we request that this is detailed alongside any future application, and that the Environmental Statement assesses the impact of this on potential flood risk associated with our network. Please note that the Trust is not a land drainage authority, and or explicit consent would be required for any such works.	The Applicant confirms that no direct discharge of water into the Canals and Rivers Trust network is proposed.
Traffic and Transport	
Chapter 13 focuses on the potential impact of the project on highways. However, as the proposed would cross our network in two locations, we request that the impact of the proposals upon navigable craft on our canals should be considered.	Ongoing discussions regarding the need for closures have taken place during the pre-application stage of the Project. A Statement of Common Ground is provided as **Application Document 5.8.** **Application Document 7.22 Navigational Risk Assessment** has been submitted and identifies the anticipated project impacts on the Stainforth and Keadby Canal and the Chesterfield Canal along with a number of risk controls. Measures to minimise impacts to canal users are set out in **Application Document 7.6 Outline Public Rights of Way Management Plan**.
Any closure of the canal to facilitate construction would need to be designated to ensure that impacts on boat traffic are appropriately managed.	**Application Document 7.22 Navigational Risk Assessment** has been submitted and identifies the anticipated project impacts on the Stainforth and Keadby Canal and the Chesterfield Canal along with a number of risk controls. Measures to minimise impacts to canal users are set out in **Application Document 7.6 Outline Public Rights of Way Management Plan**.
The Stainforth & Keadby Canal is a freight waterway, which allows for the passage of both commercial and leisure craft. The Chesterfield	**Application Document 7.22 Navigational Risk Assessment** has been submitted and identifies the anticipated project impacts on the

Canals and Rivers Trust Comment	National Grid Response
Canal is used by leisure craft. Closure of either canal to facilitate construction would sever their connection to the River Trent, which could have a significant impact on users.	Stainforth and Keadby Canal and the Chesterfield Canal along with a number of risk controls. Measures to minimise impacts to canal users are set out in **Application Document 7.6 Outline Public Rights of Way Management Plan**.
Boat users often plan routes several months in advance, and any unexpected closure could have significant economic impact upon our users, such as hire companies.	**Application Document 7.22 Navigational Risk Assessment** has been submitted and identifies the anticipated project impacts on the Stainforth and Keadby Canal and the Chesterfield Canal along with a number of risk controls. Measures to minimise impacts to canal users are set out in **Application Document 7.6 Outline Public Rights of Way Management Plan**.
Consideration would be needed to ensure that any closures are planned to limit disruption to users. Any closures would need to be co-ordinated with the Trust and applied for via the Trust's Code of Practice which stipulates specific winter stoppage dates and notice periods.	**Application Document 7.22 Navigational Risk Assessment** has been submitted and identifies the anticipated project impacts on the Stainforth and Keadby Canal and the Chesterfield Canal along with a number of risk controls. Measures to minimise impacts to canal users are set out in **Application Document 7.6 Outline Public Rights of Way Management Plan**.
Impact on traffic can be minimised if works can be co-ordinated to only occur during night time hours. Should it be demonstrated that this is not possible, then to minimise disruption to craft, work would need to occur during the winter stoppage season, for which a long notice period is required to allow for boat users to plan ahead in advance for any closure.	**Application Document 7.22 Navigational Risk Assessment** has been submitted and identifies the anticipated project impacts on the Stainforth and Keadby Canal and the Chesterfield Canal along with a number of risk controls. Measures to minimise impacts to canal users are set out in **Application Document 7.6 Outline Public Rights of Way Management Plan**.
We wish to highlight that the Stainforth & Keadby Canal and the River Trent (which lies in proximity to High Marnham) are freight waterways capable of handling freight traffic. Opportunities may exist for the carriage of construction associated traffic to the site via waterborne	The Project has considered sustainable transport modes. In terms of the Stainforth and Keadby Canal at the point of meeting the working areas (the line of route of the pylons) at Ealand, there are 4 pylons the canal could serve, 4AF122-125. The volumes needed for that would

Canals and Rivers Trust Comment	National Grid Response
craft, which could help reduce the need for carriage by road. This could help to reduce road miles and help improve the sustainability of the proposal, in line with the principles of section 2 of the National Planning Policy Framework. **We consider that options for alternative non-road based construction transport to and from the site, including use of the canal, should be considered in the Environmental Report**. We would be happy to provide further advice upon this, should the applicant with to explore use of canal for waterborne fright.	not be considerable, therefore, procuring the services for 4 80tonne barges is not commercially viable; largely as the source of the materials (in GB) would still require transportation by road to the Keadby wharf for loading. If the source was from farther afield, or abroad, it could come by sea and the River Trent, but would require being transhipped over the lock at Keadby/Trent to the wharf on the canal. Double handling in the former, triple handling in the latter. The wharf at Keadby is of a scale which can not accommodate more than two or three HGVs at a time (which would need to be reversed in and/or out of its junction with the B1392, in itself a risk). Depending on the vessel used to bring materials in, if by sea via the Trent, it may (or may not) be able to access the canal via the lock, but that would probably still mean it would need to be transhipped to a canal barge, which would require a landside crane (assuming the barge wouldn't have one). If it can't access the canal via the lock, it would need to be unloaded Trent-side and brought across the B1392 somehow to the canal wharf. This is unnecessarily complicated, with safety risks as well as detrimental commercial implications. Assuming the access at Keadby issues are overcome, the next challenge; the offloading point where the canal meets the areas of work at Ealand. Obstacles there include: • No wharf-like infrastructure – large cranes would be needed, ground investigations to ascertain if it could take a crane loading, impact on the environment (BNG specifically) • Drains either side of the canal (South Soak and North Soak) • Railway line to the north – difficult/unlikely to get permission from Network Rail to over sail their asset • Public Right Of Way to the south – would need to be diverted For these reasons it is not considered viable for the Project to utilise the canal for construction associated traffic.
Socio-Economics, Recreation and Tourism	

Canals and Rivers Trust Comment	National Grid Response
Impacts on the landscape and visual chapter of our waterway network, or impacts to boat movement could have impacts upon the attractiveness of our network in attracting visitors to the area, with potential economic consequences. We request that this is considered as part of the Environmental Statement.	**Application Document 6.17 Chapter 17 Socio-economics, Recreation and Tourism** includes an assessment of the likely impacts on the Stainforth and Keadby and Chesterfield Canals. The assessment concludes that given the short-term nature of the Stainforth and Keaby Canal closure, no significant socio-economic effects are anticipated on either waterway.
The Scoping Document identified that temporary impacts on Public Rights of way during construction are to be considered. **We request that permanent impacts from change to the visual character and attractiveness of these routes for users should also be considered to some degree. In addition, impacts on waterborne craft should also be considered.**	Visual amenity effects on users of PRoW during the operation of the Project are set out in **Application Document 6.7 Chapter 7 Visual**.
On the Chesterfield canal, the Wooden Beck visitor moorings lie within the red line boundary of the application area. Temporary or permanent closure of these during development could impact upon the local visitor economy. Should the cable cross over the moorings themselves, then is it unlikely that boaters will choose to moor below, which could significantly impact their value to the local economy.	**Application Document 6.17 Chapter 17 Socio-economics, Recreation and Tourism** includes an assessment of the likely impacts on nearby moorings along the Chesterfield Canal, namely Wooden Beck mooring and Misterton Bridge mooring. The assessment concludes that given the avoidance of closure of either mooring site, combined with the temporary nature of any impact, no significant socio-economic effect is anticipated on either mooring site.

1.5 Crowle and Ealand Town Council

Table 1.4 – Crowle and Ealand Town Council Comments

Crowle and Ealand Town Council Comment	National Grid Response
Crowle & Ealand Town Council wish to submit the following comment in regards to the above mentioned planning application.	National Grid notes this feedback.
This council strongly objects to this application on the basis of disturbance to a SSSI location; the major disruptive and negative impact to natural environment and wildlife and being an area currently striving for outstanding natural beauty we feel this application would have detrimental consequences for this status.	Potential effects from the Project on SSSIs are set out in **Application Document 6.8 Chapter 8 Ecology**.

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

Table 1.5 – Dunham-on-Trent, Ragnall, Fledborough and Darlton Parish Council

Dunham-on-Trent, Ragnall, Fledborough and Darlton Parish Council Comment	National Grid Response
Impact	
* A run of pylons will unquestionably have a long lasting negative impact on the local environment and landscape: this is very much at odds with the terms set out in the Electricity Act 1989, which states that when developing transmission network proposals, NGET must do so in a way which considers people, places and the environment - the desirability of preserving amenity duty. This proposal will degrade our environment.	Through routeing and siting, National Grid has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors. A landscape and visual assessment have been carried out as part of the ES. Impacts on landscape character are considered in **Application Document 6.6 Chapter 6 Landscape** and visual receptors considered within **Application Document 6.7 Chapter 7 Visual**.
* This proposal will have a significant impact not only on our landscape but also the well being of local residents.	**Application Document 6.18 Health and Wellbeing** undertakes a full assessment of the impact of the Project on both physical and mental health and wellbeing, considering impacts to local communities. The assessment assesses the following determinants of health and wellbeing: access to health and social care, employment and income, education and training, accessibility and safety of PRoW, active travel networks and road network, air quality, noise and vibration, open space, leisure and play, climate change, water quality, and community identity, culture, resilience and influence. This includes a consideration of how landscape and visual effects impact health and wellbeing within the community identity, culture, resilience, and influence health determinant.
* To put our area into context we have additional environmental impacts from the welcomed STEPS programme at the West	An assessment of inter-project cumulative effects with other existing and/ or approved development in set out in **Application Document 6.21 Chapter 21 Inter-project Cumulative Effects**.

Dunham-on-Trent, Ragnall, Fledborough and Darlton Parish Council Comment	National Grid Response
Burton Power Station site, the unwanted J G Pears development at the old High Marnham Power Station site with their own expansion and proposed 'new energy proposals'. (We already have the misfortune to have Pears and their negative impact on our landscape and residents), plus the potential site development at the old Cottam Power Station. In fairness most of these will impact on our local roads but put together with now National Grid landscape changes, our area feels under the cosh!!	An assessment of inter-project cumulative effects with other existing and/ or approved development in set out in **Application Document 6.21 Chapter 21 Inter-project Cumulative Effects**.

1.7 Ellerker Parish Council

Table 1.6 – Ellerker Parsh Council

Ellerker Parish Council Comment	National Grid Response
The view of the meeting was that it is appreciated that the additional capacity is required, but National Grid should lay the lines underground. This is not a case of NIMBYism, as residents understand clearly the need for additional infrastructure to support clean energy targets for the future. Rather they are voicing the concern that under-grounding is not being offered as an option because of the significant additional costs associated with routing them in this way.	The potential for localised undergrounding has been considered as part of the Project's design. National Policy Statement (NPS) EN-5 (Department for Energy Security & Net Zero, 2025) makes clear that "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 Parks, The Broads, or Areas of Outstanding Natural Beauty)". EN-5 also confirms that widespread and significant adverse landscape and/or visual impacts in other locations may also justify the use of undergrounding. National Grid has a statutory duty to develop proposals that are economic and efficient. No widespread and significant adverse landscape and/or visual impacts have been assessed to justify the use of undergrounding.
The residents have over the years, invested their time and money to ensure that this attractive and unspoiled village is protected from undue and unsuitable development. There is a conservation area order in place and a neighbourhood plan is well under way. Our village will be severely affected by the proposals of this project. If these proposals are accepted by the government Ellerker will be surrounded by pylons and cables.	**Application Document 6.10 Chapter 10 Cultural Heritage** assesses the effect on the Project on the conservation area. **Application Document 6.7 Chapter 7 Visual** assesses the visual amenity effect of the Project on the community of Ellerker.
Many European Countries have preserved the beauty and integrity of their countryside by the use of underground cables. Such an option should be available for Ellerker and the surrounding villages regardless of any increased costs. It is noted that National Grid have hinted at cheaper electricity if their proposals are accepted but our	The potential for localised undergrounding has been considered as part of the Project's design. National Policy Statement (NPS) EN-5 (Department for Energy Security & Net Zero, 2025) makes clear that "the Government's position that overhead lines should be the strong starting presumption for electricity networks developments in general,

Ellerker Parish Council Comment	National Grid Response
prime concern is the preservation of our village and the wider East Riding of Yorkshire. Other parts of the UK have underground electricity cables and although this is not widespread it should be an option for communities having infrastructure imposed on them.	this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Parks, The Broads, or Areas of Outstanding Natural Beauty)". EN-5 also confirms that widespread and significant adverse landscape and/or visual impacts in other locations may also justify the use of undergrounding. National Grid has a statutory duty to develop proposals that are economic and efficient. No widespread and significant adverse landscape and/or visual impacts have been assessed to justify the use of undergrounding.
A cross over of the lines could take place at the top of Woodale if the preferred route was to the South of Ellerker where the pylons could run in close proximity to the others. This would limit visual impact, avoid Ellerker village and also not damage the land alongside the footpath and up to Mount Airy. It also limits the need for a crossover near the A63.	A line swap is proposed at the top of Woodale and the proposed overhead line is routed in close parallel with the existing 4ZQ overhead line to the south of Ellerker.
In Woodale there seems to be a desire to use the land up to Mount Airy which would adversely affect the land, Wolds Way and views for miles. It also locks the properties at Woodale in between two pylon runs. The option of parallel pathing with the existing line needs to be the only way of using overhead - but as above underground should be the strong preference despite National Grid's protestations and the fact that the area is not strictly an Area of Natural Beauty. No settlement should be surrounded by overhead lines and pylons.	Through routeing and siting, National Grid has sought to reduce, as far as practicable, potential impacts on visual receptors. Impacts on visual receptors, including the communities between the escarpment of the Yorkshire Wolds and Ellerker, are considered within **Application Document 6.7 Chapter 7 Visual**. In this section, the proposed overhead line has been routed in close parallel with the existing 4ZQ overhead line to reduce further spread of infrastructure and in particular on the escarpment which is visible from a wide area. No settlements have pylons on all sides in this section of the Project. In addition to being parallel, the siting of individual pylons has considered the locations and spans of the existing overhead line, with synchronising of pylon locations and types where possible to create a coherent appearance, including in views from Ellerker to the east.

Ellerker Parish Council Comment	National Grid Response
Overhead lines are not fit and forget, requiring access by land and air, painting, and create significant noise and possible health risks.	The effects of Project have been assessed in this ES in **Application Documents 6.6 to 6.21** including the effects from noise and on health and wellbeing.
There will be a visual amenity impact on the Conservation Area if the lines are overhead. The importance of the landscape, natural habitat, property prices, views and footpath of the Wolds Way National Trail should be preserved along with the mature woodlands.	Through routeing and siting, National Grid has sought to reduce, as far as practicable, potential impacts on visual receptors. Impacts on visual receptors, including the community of Ellerker and effects on users of the Yorkshire Wolds Way, are considered within **Application Document 6.7 Chapter 7 Visual**. The cultural heritage assessment in **Application Document 6.10 Chapter 10 Cultural Heritage** considers the effects on setting of Conservation Areas.
Further information and reassurances are required with regards to electricity force fields particularly at the Cross Over point and the potential impact on health.	**Application Document 7.11 Electric and Magnetic Field Compliance Report** has been provided with the application for Development Consent.
Concern expressed that the lines could become an ecological trap, particularly with regards to migrating birds. The Humber is part of the UNESCO East Atlantic highway. We are the pathway that thousands of birds' cross. World Heritage are in the process of making the Humber a World Heritage Protected site. More pylons would obstruct their route and the thicker new lines that are proposed.	**Application Document 6.9 Chapter 9 Ornithology** assesses the effects of the Project on ornithology (birds).
Even now with increased traffic as we have had recently due to National Grid assessing the pylons, it has been an issue as there are limited passing places. This route is also heavily used by groups of cyclists, walkers, runners, and for sheep being moved to various fields as well as villagers. There are various weak areas with road bridges. The roads have areas of concern which are not on the council's priority list to repair.	**Application Document 6.14 Chapter 14 Traffic and Transport** assesses the effects of the Project on road users and users of PRoW and the national cycle network.
In the National Grid report they acknowledge the sensitivity of the area and state that avoiding impact will be 'difficult'. Extra pylons will add additional danger to pilots using Mount Airey airfield as well as the many microlight pilots who fly in the area.	An aviation assessment is provided as Appendix A to **Application Document 5.9 Design Development Report**.

1.8 Environment Agency

Table 1.7 – Environment Agency (EA)

EA National Infrastructure Team – Planning Advisor Comment	National Grid Response
Thank you for consulting us on the EIA Scoping Opinion for the above project. We have reviewed the Scoping Report, referenced CGNC-NG-CNS-REP-0002 and dated August 2023, and have the following advice:	National Grid notes this feedback.
We broadly agree with the topics to be scoped in and out of further assessment within the Environmental Statement (ES). We have provided our advice on the topics within our remit below. These are in the order prescribed by the Scoping Report for ease of reference.	National Grid notes this feedback.
Ecology and Biodiversity	
The Environment Agency agree with the topics scoped in within this section of the report and welcome the use of appropriate legislation listed.	National Grid notes this feedback.
Table 8.2: Relevant Local Planning Policies, Policy ENV5: Strengthening Green Infrastructure from the East riding Local Plan 2012-2029 Strategy Document (reference 2.7) states: 'Development proposals should: • Incorporate existing and/or new green infrastructure features within their design; and • Capitalise on opportunities to enhance and/or create links between green infrastructure features such as those listed in Table 10. Links should be created both on-site and, where possible, with nearby green infrastructure features. B. Development proposals within, or in close proximity to, a green infrastructure corridor should enhance the functionality and connectivity of the corridor.'	National Grid notes this feedback.

EA National Infrastructure Team – Planning Advisor Comment	National Grid Response
The Environment Agency are happy with the consideration taken by the applicant within the report but would suggest the applicant consider each Local Authorities Local Nature Recovery Strategy where the scoping boundary crosses into these areas.	The relevant Local Nature Recovery Strategies have been considered as part of the Biodiversity Net Gain Assessment (**Application Document 7.1 Biodiversity Net Gain Report**)
The mitigation measures noted within the report are satisfactory, the applicant should note that where watercourse crossings are proposed, seasonal restrictions may need to be considered, any works that may disrupt riverbanks and riverbeds may have an adverse effect on fish spawning depending on the season.	Potential effects to aquatic ecology including fish are presented in Application Document 6.8 Chapter 8 Ecology and controls including seasonal restrictions where required in **Application Document 7.3 Register of Environmental Actions and Commitments** which is secured through Schedule 2 of **Application Document 3.1 Draft Development Consent Order**.
Table 8.9 Proposed scope of the assessment, states that '*Impacts to common and widespread habitats of low sensitivity and/or conservation interest'* is to be scoped out, we would like to see a list of habitats the applicant has classified as low sensitivity and/or conservation interest to prevent and loss in vulnerable habitats.	Habitats and their importance are set out in section 8.6 of **Application Document 6.8 Chapter 8 Ecology**.
Biodiversity Net Gain	
We also support the applicant's intention to provide Biodiversity Net Gain as part of the proposals. New developments should not only protect watercourses and their riparian corridors but also provide overall net gain for biodiversity. Net gain for biodiversity is defined as delivering more or better habitats for biodiversity and demonstrating this through use of the Defra Biodiversity Metric. It encourages development that delivers biodiversity improvements through habitat creation or enhancement after avoiding or mitigating harm.	In recent years, the UK Government has introduced legislation and policy that puts biodiversity at the heart of the planning system. The Department for Environment, Food and Rural Affairs (Defra), describes Biodiversity Net Gain (BNG) as an approach to development that makes sure habitats for wildlife are left in a measurably better state than they were before development (Defra, 2026). The statutory requirement for Nationally Significant Infrastructure Projects (NSIPs) to achieve a specified biodiversity gain objective (as set out in a biodiversity gain statement) will be mandatory for applications
This approach is supported by section 4.5 of National Policy Statement EN-1 and also paragraphs 174 and 179 of the National Planning Policy Framework (NPPF).	

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The enhancement of biodiversity in and around development should be led by a local understanding of ecological networks, and should seek to include: • habitat restoration, re-creation and expansion. • improved links between existing sites. • buffering of existing important sites. • new biodiversity features within development; and • securing management for long term enhancement The Environment Act 2021 looks to ensure that the overall impact from development on the environment is positive. The Act includes measures to strengthen local government powers in relation to net gain and a minimum requirement of 10% biodiversity net gain. Although we recognise that provision of BNG is not yet mandatory for Nationally Significant Infrastructure Project, we encourage the applicant to consider an approach to development that results in measurable net gains in biodiversity, having taken positive and negative impacts into account. The Planning Practice Guidance (PPG) provides guidance on the application of net gain and Institute of Ecology and Environmental Management, together with CIRIA and the Institute of Environmental Management and Assessment have published guidance on how to deliver net gain in practice. These can be downloaded here.	made from 2 November 2026. The biodiversity gain objective for energy NSIPs, as set out in Nationally Significant Infrastructure Projects: Biodiversity Gain Statement for Energy (Defra, 2026), will require that the biodiversity value attributable to a development exceeds the pre-development biodiversity value of the on-site habitat by at least 10%. This is referred to as 10% BNG. The Project application for development consent is being submitted prior to 2 November 2026 and therefore the provision of 10% BNG is not mandatory. Notwithstanding, the Overarching National Policy Statement for Energy (EN-1) (Department for Energy Security and Net Zero, 2025) states that NSIPs should seek opportunities to provide BNG, including wider environmental gains and benefits to local communities and national policy priorities, where possible, and the Secretary of State should give appropriate weight to environmental net gain and BNG during decision making. However,10% BNG is not a legal requirement for this application for development consent. National Grid's environmental and social commitments in its Social and Environmental Action Plan (National Grid, 2026) include a commitment to deliver a minimum of 10% BNG with potential for wider environmental and societal benefits for all developments for which planning permission or development consent is required. Therefore, the Project proposes to deliver 10% BNG with potential for wider environmental and societal benefits on a voluntary basis, and substantively follows the guidance set out in Nationally Significant Infrastructure Projects: Biodiversity Gain Statement for Energy (Defra, 2026). Detail on the Project's approach to voluntary BNG is provided in **Application Document 7.20 Design Development**

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	Report - 2025 and **Application Document 7.1 Biodiversity Net Gain Report**.
Water Environment – Flood Risk	
Large parts of the proposed development is situated within Flood Zones 2 & 3 with some parts being located within Flood Zone 3b, it is essential that the Sequential Test and Exemption Test is required to ensure reduction in risk is mitigated as much as possible.	The Applicant has prepared **Application Document 7.13 Flood Risk Assessment**, which sets out how the Sequential and Exception Tests have been applied, and presents the evidence to satisfy the requirements of the Exception Test.
In accordance with National Planning Policy Framework (NPPF) and the sequential test (paragraph 161), 'development should apply a sequential, risk-based approach to the location of development, taking into account all sources of flood risk and the current and future impact of climate change, to avoid (where possible) flood risk to people and property'. The development should take a sequential approach where it can, if there are any opportunities for development to be located outside of Flood Zones 2 and 3 and into Flood Zone 1, this should be prioritised. If there is any above ground construction that is in an undefended area, any increases in the footprint of the buildings will require floodplain compensation; the Flood Risk Assessment (FRA) needs to consider floodplain compensation on a level-for-level, volume-for-volume basis. With regards to floodplain compensation, The Environment Agency would usually consider the 1-in-100-year plus 30% climate change flood height as the (fluvial) 'design flood'. The FRA also needs to ensure that there is no increase in flood risk to third parties because of this development, for example by altering flood flow routes.	The Applicant has prepared **Application Document 7.13 Flood Risk Assessment** which sets out how the Project has applied the Sequential Test. 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. A sequential approach has therefore been adopted. Works in higher risk areas would largely be temporary, associated with construction of the Project. During its operation, permanent project infrastructure would be limited to a small number of pylons, that are of low vulnerability to inundation. As also described in the Flood Risk Assessment compensation storage will be provided for permanent losses within the same floodplain cell for the design flood. The assessment demonstrates that there would be no increase the overall flood levels and no 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.

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The report discusses the use of temporary and permanent culverts. If these are in relation to culverting of main rivers, The Environment Agency's policy on culverts states "We are opposed to the culverting of any watercourse because of the adverse ecological, flood risk, geomorphological, human safety, and aesthetic impact… The applicant will be expected to demonstrate why culverting is both necessary and the only reasonable and practicable alternative. Alternatives could include open span bridges, revisions to site layout or diversion of the watercourse."	The Applicant confirms that culverting of main rivers is not proposed. This commitment is included in **Application Document 7.3 Register of Environmental Actions and Commitments** which is secured by Schedule 2 of **Application Document 3.1 Draft Development Consent Order**.
Paragraph 2.3.19 of the Scoping Report references paragraph 154 of the NPPF in acknowledgement that development should be planned in a way to avoid increased vulnerability to the range of impacts arising from climate change. Although we are pleased that this has been acknowledged, given the flood risk associated with certain areas within the scoping boundary, we would expect the Scoping Report to also make note of the NPPF policies specifically relating to development and flood risk (paragraphs 159-169)	Table 11.3 in **Application Document 6.11 Chapter 11 Water Environment** describes NPPF sections relevant to water environment and how/where in the Application these requirements have been addressed.
Chapter 4 discusses the Limits of Deviation (LoD), with paragraph 4.2.42 referring to LoD to allow for necessary and proportionate flexibility in terms of underground cables and trenchless crossings. Such activities could also have an adverse impact on flood risk and any flood defence assets, so we recommend that flood risk be taken into consideration when setting the LoD.	As a result of further assessment and appraisal, no sections of undergrounding on the overhead line are proposed. However, there is the requirement to divert existing utilities including low voltage wood pole and telecommunication overhead lines. This includes undergrounding of these assets. The potential for flood risk effects associated with these works are assessed in **Application Document 7.13 Flood Risk Assessment**. **Application Document 6.4 Description of the Project** provides further description of the proposed methods of underground cable installation and construction of trenchless crossings and crossings of watercourses. These works would be undertaken subject to the environmental controls (including flood risk and drainage controls) that are detailed in **Application Document 7.3 Register of Environmental Actions and Commitments**.

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Paragraph 10.4.1 lists the flood risk data sources used to inform the scoping report. In addition to the sources listed, we strongly recommend that the local Strategic Flood Risk Assessments be used in better understanding current and future flood risk.	**Application Document 7.13 Flood Risk Assessment**, in section 4.2, presents a summary of key information collected from a review of all relevant local Strategic Flood Risk Assessments.
In accordance with The Planning Practice Guidance (PPG) and the Flood risk vulnerability classification, this development would be considered 'essential infrastructure'. Further guidance can be found via the following link Flood risk assessments: climate change allowances - GOV.UK (www.gov.uk). For developments that fall under this classification and that are located within the Lower Trent and Erewash Management Catchment, it is required that they assess the risk of flooding using a 39% climate change allowance for fluvial flood risk. This is known as the Higher Central allowance. For tidal flood risk, this should be assessed using the 1-in-200-year event and the Upper End allowance. For developments that fall under this classification and that are located within the Don and Rother Catchment, it is required that they assess the risk of flooding using the Higher Central allowance for fluvial flood risk. For tidal flood risk, this should be assessed using the 1-in-200-year event and the Upper End allowance.	Table 2.5 of **Application Document 7.13 Flood Risk Assessment** describes the climate change allowances that have been adopted in the assessment, which are in line with Environment Agency guidelines.
Paragraph 10.7.9 discusses the limits of the scoping assessment undertaken. However, we have concerns over the assumptions that have been made in terms of the scoping assessment of flood risk (section 10.7.9): • *'It is assumed there is sufficient data from the Environment Agency, LLFA and IDBs to inform a site-specific FRA and that no new flood risk models will need to be developed.*' The agencies listed can provide the best available data, but these are often larger catchment-scale models, which may not be appropriate for a more thorough site-specific assessment. Furthermore, 'best available data' does not necessarily mean the data is fit for its intended use. A thorough assessment of the suitability of any flood models should be undertaken prior to deciding whether any new or updated modelling is necessary to undertake a site-specific flood risk assessment.	The Applicant has engaged with the Environment Agency to agree on the data that has been used to inform the **Application Document 7.13 Flood Risk Assessment**. A review of all received Environment Agency models was undertaken to ensure the suitability of the data for informing a site specific risk assessment. The Projects interactions with flood defences are very limited during operation but there would be some crossings of defences by temporary construction access routes. At the detailed design stage of the Project, where it is deemed that temporary works have any potential for an impact to the flood defences, then the flood defence would be monitored to establish a pre-construction baseline and for a period after completion of works to construct the crossings to enable

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• *'It is assumed there is sufficient data from the EA to define the current condition and standards of protection provided by existing flood defences, and that no baseline condition surveys will be required.'* It is up to the applicant to demonstrate that any data obtained is suitable for use. Some assets may be third-party owned so the Environment Agency may not have the necessary data on the condition and standard of protection provided. It is also up to the applicant to determine whether a more recent condition survey is required based on what data is currently available.	detection of any effects on the structural integrity/condition of the assets during construction of the Project. The requirement for any such monitoring will be discussed with the Environment Agency as part of the application for a Flood Risk Activity Permit. This is secured through a commitment within **Application Document 7.3 Register of Environmental Actions and Commitments**.
When discussing flood risk, most of the key areas we expect to be discussed are acknowledged within the report, showing recognition of the potential flood risk implications of the scheme. Based on the information provided within the EIA Scoping Report, we consider there to be ample justification for the flood risk themes (proximity to main rivers and flood defence assets; fluvial flood risk; tidal flood risk; flood flow routes; and future flood risk and climate change) to be scoped into the ES. However, the applicant has decided to scope all of these topics out of the assessment without sufficient justification.	All of the noted topics are addressed within **Application Document 7.13 Flood Risk Assessment** that has been prepared by the Applicant.
Regarding flood risk, parts of the site are located within the Isle of Axholme flood risk area. This is an area of land (the historic flood plain of the River Trent) which has been artificially drained, with water levels managed by a network of pumping stations. The Isle of Axholme has a critical flood level of 3.8 metres Above Ordinance Datum (AOD), this is an estimated flood level following a prolonged breakdown of the pumping station network and high-water levels on the River Trent. Further details relating to the critical flood levels and appropriate finished floor levels for development can be found within the North and Northeast Lincolnshire Strategic Flood Risk Assessment (November 2021) Strategic Flood Risk Assessment | NELC (nelincs.gov.uk)	This information is noted and has been used to inform **Application Document 7.13 Flood Risk Assessment**.
Proximity to main rivers and any flood defences assets would be expected to be scoped in, but the applicant has not considered this in the EIA Scoping Report. This is currently not considered as part of the scoping report but is an important consideration in terms of current and future flood risk and ensuring that flood risk is not increased elsewhere. Without early consideration of any	Works in proximity to or interfacing with main rivers and flood defences have been assessed within **the Application Document 7.13 Flood Risk Assessment** and **Application Document 6.11 Chapter 11 Water Environment**. A series of control and management measures to prevent likely

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interaction between the scheme and main rivers/flood defence assets there may be a risk to the structural integrity of any flood defences assets, engineered or natural, essential in ensuring that flood risk is not increased elsewhere. Generally, we seek for any works to take place more than 8m from a fluvial main river or flood defence (taking into consideration any possible underground structures/buried elements associated with a defence), or 16m from a tidal main river or flood defence (taking into consideration any possible buried elements associated with a defence). As the Scoping Report does not refer to any minimum setback, we have to assume that activities will be taking place in close proximity to main rivers and flood defences and so expect this to be scoped into the assessment to ensure consideration of suitable mitigation.	significant effects are secured through inclusion within **Application Document 7.3 Register of Environmental Actions and Commitments**, inclusive of a commitment to maintain a buffer between Project activities/infrastructure and watercourses where practicable.
Paragraph 4.6.1 states that the design life of the Project is to be at least 80 years, but that with regular maintenance it could be extended further. Therefore, as a minimum, the scheme should be considering the potential flood risk implications of the scheme for the next 80 years. Given that there are already areas within the scoping boundary at high risk of flooding from tidal / fluvial sources, this risk is expected to increase in the future with climate change, which is why we consider it essential that future flood risk and climate change is scoped into the ES.	Table 2.5 and its accompanying text in **Application Document 7.13 Flood Risk Assessment** describes the climate change allowances that have been adopted in the assessment, which are in line with Environment Agency guidelines.
We support the production of a Flood Risk Assessment & Water Framework Directive (WFD) Screening Assessment to inform the EIA process. We recommend that the Flood Risk Assessment should consider methods that have multiple benefits such as Natural Flood Management and SUDS where flood water management is required. The WFD Screening Assessment should include opportunities to enhance the watercourses effected as this would provide mitigation, WFD improvements and potential for Biodiversity Net Gain, particularly where watercourses have been degraded by land drainage activities.	The Applicant has committed in **Application Document 7.3 Register of Environmental Commitments** to implementing a range of SuDS to manage surface water runoff from the Project during its construction, with the operational Project have a negligible influence on the land drainage regime.

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Section 10.4.13 states '*Many of the watercourses in the study area have been subject to modifications for the purposes of land drainage and flood defence and have hydromorphological designations as 'Heavily Modified' waterbodies (HMWB). The ordinary watercourses in the study area, particularly those within IDB districts, also serve a land drainage function and have a relatively low hydromorphological diversity.'* Where the development is proposed in an Internal Drainage Board managed area the ES should also consider the long-term future of the proposal in terms of climate change. Much of this land is only 3m above sea level and rising sea level effected by climate change should be considered as part of the design process.	The Applicant has engaged with all relevant Internal Drainage Boards in shaping the Projects surface water drainage and ordinary watercourse crossing principles and has considered climate change over the operational lifetime of the Project when shaping these principles.
Geology and Hydrogeology	
Due to the very large scale of the proposed scheme the site is underlain by several geological formations. The following bedrock formations located beneath the proposed development are classified as Principal Aquifers - Burnham Chalk Formation, Welton Chalk Formation, Ferriby Chalk Formation, Hunstanton Formation, Brantingham Member, Upper Lincolnshire Limestone Member, Lower Lincolnshire Limestone Member.	The baseline conditions, including the identification of bedrock geology and aquifer designations within the study area, are described in **Application Document 6.12 Chapter 12 Geology and Hydrogeology**.
Secondary A aquifers associated with the Kellaways Sand Member, Thorncroft Sand Member, Frodingham Ironstone are present beneath the development site. A large proportion of the site is underlain by the Mercia Mudstone and Scunthorpe Mudstone Formation, both of which are classified as Secondary B Aquifers. Other bedrock formations include the Clarborough Member, Charmouth Mudstone Formation, Penarth Group, (Secondary Undifferentiated) and the Ancholme Group and Whitby Mudstone Formation (Unproductive Strata).	The baseline conditions, including the identification of bedrock geology and aquifer designations within the study area, are described in **Application Document 6.12 Chapter 12 Geology and Hydrogeology.**
Various superficial deposits overlie the bedrock, although in some locations the superficial deposits are absent. The superficial deposits include the Bielby Sand Member, Alluvium, Warp, Blown Sand, Sutton Sand Formation, Glaciofluvial deposits, Holme Pierrepont Sand and Gravel member which are	The baseline conditions, including the identification of bedrock geology and aquifer designations within the study area, are described in **Application Document 6.12 Chapter 12 Geology and Hydrogeology**.

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all classified as Secondary A aquifers. Till and Head deposits are also present and these are classified as Secondary (undifferentiated) aquifers. The Hemingbrough Glaciolacustrine Formation and Peat superficials are classified as Unproductive Strata.	
Part of the study area is within a Source Protection Zone (SPZ). These are associated with abstractions to the north of Cottingham. The study area crosses the shared SPZs (1, 2 & 3) for a collection of abstractions from the Chalk Principal Aquifer. Development in this area will have to be carefully managed to prevent pollution of this vulnerable groundwater.	The baseline conditions, including the identification of groundwater Source Protection Zones (SPZ) 1, 2 and 3 within the study area, are described in **Application Document 6.12 Chapter 12 Geology and Hydrogeology**. Where the Project interacts with SPZ 1, this has been discussed with the Environment Agency on 19 September 2025 and the potential risks are described in **Application Document 6.12.A4 Appendix 12.4 Groundwater baseline and Qualitative Groundwater Risk Assessment**
The construction and operation of the proposed development may require a number of environmental permits and early discussions with the Environment Agency about this is important.	Commitments in **Application Document 7.3 Register of Environmental Actions and Commitments** secure the need to obtain appropriate Environmental Permits in relation to geology and hydrogeology.
Having the appropriate pollution prevention measures in place to protect the water environment during the construction and operational phases is also an important factor that must be considered.	The control and management measures specific to geology and hydrogeology that will be implemented to limit effects related to the Project, are described in **Application Document 7.3 Register of Environmental Actions and Commitments.**
Dewatering for the trenchless crossings must in the assessment of risks to groundwater also include an assessment of whether the activity could induce saline intrusion as the Chalk is susceptible to this process in this area.	**Application Document 6.12.A4 Appendix 12.4 Groundwater baseline and Qualitative Groundwater Risk Assessment** provides an assessment of the potential trenchless crossings. The assessment has not identified any potential effects to groundwater and groundwater receptors, from dewatering associated with trenchless crossings.

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The remaining activities that have the potential to cause risk to groundwater will be included in the CEMP. These include, • Construction methods such as appropriate piling techniques (if required) to minimise the risk of mixing of aquifer bodies through the creation of new pathways. This includes the provision of a risk assessment, which would be • undertaken once the proposed foundation solutions are known, in accordance with EA guidance 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination'. • Where new or additional surfacing is required on any access tracks and compound areas, these will be permeable surfaces where ground conditions allow. The project will incorporate appropriate surface water drainage measures into its final design for the any access tracks so that they do not lead to a significant increase in flood risk. Temporary haul routes within Flood Zone 3 and areas of high and medium risk of flooding from surface water will be removed at the end of the construction phase and the ground surface will be reinstated to pre-project levels. • All use and storage of chemicals and fuels are to be undertaken in accordance with EA guidance and the Control of Pollution (Oil Storage) Regulations and also be controlled and monitored under the Construction and Environmental Management Plan (CEMP); • The control of earthworks or materials movement (including any re-use of materials) under appropriate Environmental Permits, exemptions or CL:AIRE The definition of Waste: The Development Industry Code of Practice (2011); • Any temporary dewatering activities during construction will be undertaken in accordance with appropriate EA guidance (including appropriate assessment undertaken as required by the guidance), and if required, an Abstraction License and Environmental Permit (for the discharge); • A protocol for dealing with any unexpected contamination will be included within the CEMP	The control and management measures specific to geology and hydrogeology that will be implemented to limit effects related to the Project, are described in **Application Document 7.3 Register of Environmental Actions and Commitments**

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The proposed methodology for assessing risks to groundwater receptors within the CEMP is largely acceptable although we have the following comments to make. • The applicant should ensure that all groundwater abstractions are included in the assessment, i.e. licensed and private supplies. • Regarding the surface water drainage, pollution prevention measures should be incorporated. This is particularly important in the areas that pass through the source protection zones. • Parts of the development boundary overlie the Chalk which is classified as a Principal Aquifer. Pollution prevention in these areas will be crucial, especially during the construction phase, to prevent issues with sediment fines. Some of the abstractions in this area are from adits, rather than boreholes, which are particularly vulnerable to pollution.	**Application Document 6.12.A4 Appendix 12.4 Groundwater baseline and Qualitative Groundwater Risk Assessment** includes licensed abstractions and private water supplies identified within the study area. Surface water drainage proposals incorporate measures to both attenuate and treat runoff from construction work sites, to mitigate the potential for pollution of the receiving water environment. The control and management measures that will be implemented to limit effects related to the Project, are described in **Application Document 7.3 Register of Environmental Actions and Commitments** – including those specific to geology and hydrogeology**.** These include a commitment that secures the requirement for appropriate selection of piling techniques and provision of a foundation works risk assessment following detailed design, and in accordance with CL:AIRE guidance Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention. (CL:AIRE, 2025).
Paragraph 4.3.47 details how horizontal directional drilling will be carried out if required. This activity has the potential to cause pollution if not completed in a controlled manner. This activity does not appear to be mentioned in the proposed CEMP. If horizontal directional drilling (HDD) is used for the installation of cables this work could involve the use of drilling muds and their use may require risk assessment to ensure they do not pose a risk to controlled waters. It is possible that a permit for their use may be required unless an exemption applies. Early discussion with the Environment Agency about the permitting requirements is therefore important. The potential to use HDD techniques should therefore be included in the CEMP if it is likely to be an option. This is particularly important if it will be used within a source protection zone.	The control and management measures specific to geology and hydrogeology that will be implemented to limit effects related to the Project, are described in **Application Document 7.3 Register of Environmental Actions and Commitments.** These include a commitment that secures the requirement for a drilling fluid breakout plan to be developed by the Contractor following detailed design, and where Horizontal Directional Drilling is proposed.

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Paragraph 11.5.4 states that *"Where specific sites have been identified in the study area with a moderate (or above) risk to sensitive receptors from potential contamination – these sites will initially be reviewed against the Order Limits. Where the Order Limits and proposed construction activities do not interact with these sites, no further assessment will be required. However, where there is potential for any interaction of the Order Limits or proposed construction activities with these sites, each site will be individually investigated and assessed (in accordance with guidance described in 11.2.7) to determine any mitigation measures or remediation requirements required. The nature and scope of any mitigation or remediation will be agreed with the EA and LA (as appropriate)."*	National Grid notes this feedback.
Whilst we are largely satisfied with this approach, we are likely to suggest that a requirement is included within the DCO for land contamination to be investigated as and when required. The report states that the land contamination risk assessments will be prepared in line with our Land Contamination Risk Management guidance Land contamination risk management (LCRM) - GOV.UK (www.gov.uk).	The control and management measures that will be implemented to limit effects related to the Project, are described in **Application Document 7.3 Register of Environmental Actions and Commitments** – including those specific to geology and hydrogeology**.** These include GH01 that secures the requirement for intrusive ground investigations and assessment to be undertaken prior to construction, including geoenvironmental sampling, testing and assessment. GH02, that secures the requirement for further assessment and investigation of sites that are identified as presenting a moderate and above risk of contamination being present, with the nature and scope of any mitigation or remediation to be agreed with the Environment Agency as appropriate.
We are satisfied with the proposed way forward and assessment methodology, provided the above comments and recommendations are incorporated.	National Grid notes this feedback.

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Permitted landfill	
There is an active inert landfill, Little Weighton Cutting Landfill (reference EA/EPR/DB3708CC) within the study area. This is mentioned in Appendix 11.A. As the site is active, with monitoring taking place from groundwater boreholes, these monitoring boreholes should not be disturbed during the works. Discussion with the operator of this permitted site is likely to be required to ensure any interactions with the landfill does not affect their monitoring or operation.	No pylons will be placed or significant (<600mm) ground disturbance/ excavations undertaken within this landfill, this is secured through GH13 in **Application Document 7.3 Register of Environmental Actins and Commitments.**
Air Quality	
Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/ or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority.	Whilst it is not practicable to commit to the exclusive use of Stage V None Road Mobile Machinery (NRMM) throughout construction, measure AQ11 of **Application Document 7.3 Register of Environmental Actions and Commitments** promotes the use of Stage V NRMM wherever reasonably practicable, alongside electric and low-carbon alternatives where feasible. AQ12 also requires generators to meet Stage V emissions standards. It is considered that these measures provide an appropriate and proportionate means of minimising emissions from construction plant and equipment.
This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NOx), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM10 and PM2.5). Use of low emission technology will improve or maintain air quality and support LPAs and developers in improving and maintaining local air quality standards and support their net zero objectives.	Measures to minimise emissions from construction plant and vehicles are included in **Application Document 7.3 Register of Environmental Actions and Commitments**. AQ11 and AQ12 promote the use of Stage V NRMM and generators, together with electric or other low-carbon alternatives where practicable. AQ13 further requires construction vehicles to meet the latest applicable Euro emissions standards, including Euro 6 for diesel light vehicles and Euro VI for HGVs. It is therefore considered that appropriate measures have been embedded within the Project to minimise air quality effects associated with construction activities.

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We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority.	The Applicant is not aware of a local NRMM registration scheme applicable to the Project area. However, the Project includes measures to promote the use of lower-emission plant and equipment and to ensure appropriate management of construction activities, as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**.
The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit.	National Grid notes this feedback.
Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application to which this then can be applied.	A list of machinery likely to be required during the construction of the Proposed Project is provided in **Table 16.1** of **Application Document 6.16A3 Appendix 16.3 Construction Noise and Vibration Data.**
Noise and Vibration	
Vibration from the installation of structures may adversely affect flood defences from vibration. By way of example, Section 4.2 discusses the installation of pylons and other above ground structures. Given there is no indication of where such structures will be installed in relation to main rivers or flood defences, we would like to see vibration monitoring scoped into the assessment to ensure that the associated vibrations will not adversely affect any flood defence structures. Vibration should be limited to a safe threshold using appropriate guidance. For example, the type of pylon foundation chosen (e.g., pad and column, mini pile or tube pile) and associated methodology should be assessed. Depending on proximity an assessment may also be required for vibration from HGV traffic/plant.	Potential effects of the Project from vibration on structures has been scoped into the assessment and is presented in Application Document 6.16 Chapter 16 Noise and Vibration. No specific locations have been identified where there is the potential for structural damage. This will be reviewed by the Main Works Contractor(s) as part of their detailed assessments, as per commitment NV01 of **Application Document 7.3 Register of Environmental Actions** and Commitments and specific mitigation measures will be identified to reduce any potential effects. If construction vibration levels are predicted to approach or exceed the

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	threshold for potential damage, even with mitigation (although this is considered unlikely), pre- and post-condition surveys would be undertaken of the building or structure, and any damage deemed to be caused by the works would be rectified, as per commitment NV04 of **Application Document 7.3 Register of Environmental Actions and Commitments**.
Climate Change	
Whatever final design or location is chosen the likely life span of the site will mean that it will need to operate within a changing climate. Therefore, a robust design and sensitive final location selection to accommodate future climate change impacts should be pursued. This will need to consider issues such as flood risk, increased heat, and drought, all of which could impact on the efficient running of the site. Climate change impact risk assessment and adaptation measures should include the potential impact of a changing climate for the expected duration of site operations.	**Application Document 6.19 Chapter 19 Climate Change**, assesses the potential impacts of climate change on the Project and incorporates consideration of climate resilience within the assessment operational life span. Receptor sensitivity has been evaluated with regard to the Project's physical characteristics, design life and operational requirements through to 2099. The assessment considers the potential effects of future climate change, including increased flood risk, higher temperatures, drought conditions, and other relevant climate hazards, and identifies appropriate embedded adaptation measures to ensure the Project remains resilient and operational throughout its anticipated lifetime.
Waste Management	
Waste on Site Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste. The applicant should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of	The Project would require the use of new materials during construction such as galvanised steel for the pylons, reinforced concrete for the foundations, insulator sets (typically glass, porcelain or polymeric) and aluminium conductors. The material sources are unlikely to be identified until the detailed design stage of the Project, which would happen post-consent. The nature of the Project means that it is

EA National Infrastructure Team – Planning Advisor Comment	National Grid Response
any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. • The Environment Agency recommends that the applicant should refer to our: Position statement on the Definition of Waste: Development Industry Code of Practice and; • website at https://www.gov.uk/government/organisations/environment-agency for further guidance	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. 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. Waste materials would be produced by the Project. The Main Works Contractor(s) would be required to produce a Site Waste Management Plan (SWMP) prior to construction (commitment GG24 in **Application Document 7.3 Register of Environmental Actions and Commitments**). This would set out the measures to reduce the generation of waste in the first place and appropriate measures to reuse and recycle materials where practicable. It would also identify appropriate waste facilities to dispose of materials.
Waste to be taken off site Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes: • Duty of Care Regulations 1991 • Hazardous Waste (England and Wales) Regulations 2005 • Environmental Permitting (England and Wales) Regulations 2010 • The Waste (England and Wales) Regulations 2011	
The applicant should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.	
If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period the developer will need to register with us as a hazardous waste producer. Refer to our website at www.gov.uk/government/organisations/environment-agency for more information.	

EA National Infrastructure Team – Planning Advisor Comment	National Grid Response
Environment Agency Land There are some areas of land, specifically around main rivers, which are land owned by the Environment Agency. Due to the large scoping area, it is unclear at this stage whether this land will be affected by the proposals, but we would welcome ongoing discussions with the applicant about this.	National Grid notes this feedback and has continued to engage with the Environment Agency throughout the development of the Project
Environmental Permitting Regulations ***Flood Risk Activity Permit*** There are a number of main rivers withing the scoping boundary. The Environmental Permitting (England and Wales) Regulations (EPR) 2016 require a permit to be obtained for any activities which will take place: • on or within 8 metres of a main river (16 metres if tidal) • on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal) • on or within 16 metres of a sea defence • involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or • culvert • in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission	National Grid notes this feedback and as set out in **Application Document 5.4 Consents and Licences Required Under Other Legislation** the necessary Flood Risk Activity Permit will be obtained prior to the relevant works commencing.
For further guidance please visit Flood risk activities: environmental permits - GOV.UK (www.gov.uk) or contact our National Customer Contact Centre on 03708 506 506. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.	National Grid notes this feedback.
The scoping report does not discuss the specific measures proposed to cross the watercourses identified, but we welcome the production of a watercourse crossing survey and would welcome early discussions on this.	A watercourse crossing schedule is provided at Application **Document 6.4.A2 Appendix 4.2 Bridge and Culvert Schedule**. Discussions on the Project approach to watercourse crossings have taken place with the Environment Agency throughout the pre-application stage.

EA National Infrastructure Team – Planning Advisor Comment	National Grid Response
If any fencing is to be erected on the site, we would request fences are not within 8m of the flood defence or main river edge to allow inspections of the assets and watercourse to be unimpeded. A buffer zone of 8m from any watercourse or asset would be desirable. We would again, encourage early engagement should this not be achievable.	The Applicant has committed to maintain Stand-off buffers to all watercourses and land drains of 10 m where practicable, with the exception of those to be crossed with a new or modified crossing point.
There is no mention at this stage regarding whether the applicant will seek to dis-apply the Environmental Permitting Regulations 2016. Whilst disapplication is common practice in DCO proceedings, we still require to be formally notified of this intention. If disapplication is formally notified to us, we still require discussions with the applicant around the proposals and will secure our interests by way of approval of plans through Protected Provisions. There is no guarantee that we will agree to dis-apply EPR.	National Grid notes this feedback. The Project approach to the Environmental Permitting Regulations 2016 is set out in **Application Document 5.4 Consents and Licences Required under other Legislation.** It is proposed to seek permits post-consent following detailed design work.
Dewatering / Abstraction If dewatering is required, it may require an environmental permit if it doesn't meet the exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works. Temporary dewatering from excavations to surface water: RPS 261 - GOV.UK (www.gov.uk)	National Grid notes this feedback and as set out in **Application Document 5.4 Consents and Licences Required Under Other Legislation** the necessary permit will be obtained prior to the relevant works commencing.
If they don't meet the exemption and require a full abstraction licence, they should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found here, Abstraction licensing strategies (CAMS process) - GOV.UK (www.gov.uk)	National Grid notes this feedback.
Please note that the typical timescale to process a licence application is 9-12 months. The applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning.	National Grid notes this feedback.

EA National Infrastructure Team – Planning Advisor Comment	National Grid Response
The applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found here, Discharges to surface water and groundwater: environmental permits - GOV.UK (www.gov.uk)	National Grid notes this feedback.
The use of drilling muds for the directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended.	National Grid notes this feedback.
If the applicant is intending to seek to disapply any of the Environment Agency's legislation, they should contact us as early as possible. Further information on this can be found here, https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/an11-annexd/	National Grid notes this feedback.

1.9 Historic England

Table 1.8 – Historic England

Historic England Comment	National Grid Response
Thank you for consulting us on EIA scoping for this scheme (as attached). Historic England is the Government's advisor on the Historic Environment, I am leading on this case across both our Midlands and Yorkshire regions as the majority of the route lies south of the Ouse.	National Grid notes this feedback.
Thank you for consulting historic England on NGET's proposals for a new 400kV line North Humber to High Marnham with associated substation / connection works	National Grid notes this feedback.
We welcome the iterative approach set out and the scoping in of heritage matters including both direct archaeological and setting effects, the advice and expertise of local authority archaeological curators and built environment specialist will be of great importance. It is likely that there will significant environmental effects in respect of the historic environment but with a robust and iterative approach to assessment and design refinement these can be minimised.	National Grid notes this feedback.
Methods	
We welcome 9.7.10 – that professional judgement and consultation can be applied to refine the banding of asset importance 'asset value' in Table 9.6 on an individual basis	Noted, no further response required
In Table 9.7 the band for 'Large' impact sets the bar too high in terms of direct impacts upon significance – we suggest …'Changes such that the heritage value of the asset is totally altered or destroyed or that heritage value central to its significance is lost'.	Noted, this amendment to the methodology for assessment has been made in **Application Document 6.10 Chapter 10 Cultural Heritage**

Historic England Comment	National Grid Response
Where an impact upon the significance of a designated heritage asset falls below the threshold for EIA reporting as a significant effect, but where it would still represent some harm to the significance of a designated asset this should be clearly signposted in the ES such that decision maker has before them sufficient information to apply NPS/NPPF requirements in respect of all harm to designated heritage assets.	The approach to establishing harm is described in **Application Document 6.10 Chapter 10 Cultural Heritage**, which acknowledges that there is no direct correlation between the significance of effect as reported in an ES chapter, and the level of harm caused to heritage value. A Heritage Statement of Harm is presented in **Application Document 5.5 Planning Statement**.
Routeing and construction	
The visual representation of the preferred corridor and the weighted desirability of routing within that corridor is very helpful as is the clear mapping of the existing line. We note from the meeting that at the crossing of the Ouse, NGET would need higher towers (~100m) to maintain shipping channel up the Ouse to Port of Goole. The impact of the pylon construction (and any underground elements) will also include access works, compounds for welfare, lay-down etc. It is important that all elements of the project including sub-contractor facilities remain in the scope of the Environmental Statement to avoid unplanned / unmanaged impacts. Landscape In the case of both the Yorkshire Wolds and the Isle of Axholme their landscape quality and potential for designation as AONB focuses attention of the need for particular consideration of landscape impacts in the context of NPS EN-5, the 1989 Electricity Act and the 'Holford Rules'. The below ground impacts of undergrounding and the visual and archaeological impacts of sealing compounds will also need to be considered alongside the cumulative impacts / opportunities in relation to existing overhead lines.	Noted, all elements of the Project with the potential to result in impacts to heritage assets are assed in in **Application Document 5.5 Planning Statement.**
Yorkshire Wolds	
The Yorkshire Wolds was one of a group of four new protected areas proposed by Natural England in 2021	National Grid notes this feedback.

Historic England Comment	National Grid Response
Isle of Axholme	
The Isle of Axholme is identified in North Lincolnshire Council's existing and emerging local plan policies as an area of special landscape interest. This is further reflected in a desire by the authority to see the area afforded AONB designation. See Isle of Axholme HLC Miller Report Countryside Commission 1997 (in particular maps at pp196-197) Landscape Character Assessment & Guidelines 1999 Review of Isle of Axholme Historic Landscape Character JBSA Consulting 2021. It will be important to minimise impact on the historic landscape of open strip fields, early enclosure, settlements and wetland management and exploitation (all in Miller 1997). Route comments by section	Within the Isle of Axholme Area of Special Historic Landscape Interest, the overhead line has been close paralleled with the existing overhead line, where practicable , to minimise setting change. As reported in section 10.8 of **Application Document 6.10 Chapter 6 Cultural Heritage**, post mitigation, minor adverse effects have been assessed for the Isle of Axholme Area of Historic Landscape.
Section 1: Creyke Beck - Skidby	
The Scheduled Monument of Risby Jacobean gardens, hall and medieval settlement and Risby Hall Registered Park and Garden (Grade II) lie immediately to the north of the proposed corridor. In view of their rarity, great variety of form, and importance for understanding high status houses and their occupants, all surviving examples of an early date will be identified to be of national importance. The 17th century garden earthworks at Risby are well preserved and a fine example of Jacobean garden design. The designed landscape that forms the Registered Park dates to the late 18th century and was planned by Eaton Mainwaring Ellerker in 1760. The setting of both the scheduled monument and the park is agricultural fields. The open rural setting surrounding the gardens and registered park makes a positive contribution to their significance. The proposals have the potential to affect the setting of these heritage assets and the applicant should fully assess the contribution setting makes to the significance of these assets in order to fully understand any harm that may result from the proposals.	Consideration was given during the pre-application consultations to impacts on the scheduled monument and Registered Park and Garden of Risby Jacobean gardens, hall and medieval settlement remains, but constraints on other alignments are such that likely significant effects are predicted. This aspect of the Project has been the subject of further consultation with Historic England since the Scoping Stage, who have acknowledged the efforts made to avoid and minimise impact on these assets, and also acknowledging the constraints on alternative alignments.

Historic England Comment	National Grid Response
Section 2: Skidby - A63 dual carriageway	
The proposals have the potential to affect the setting of GII* Church of St Peter in Rowley. The Church of St Peter dates from the 12th century, and the south aisle survives from that date amongst later 15th and 18th century additions. It is set within the ground of the GII listed Rowley Manor, in a parkland context with rural agricultural fields further afield. The open rural setting surrounding the church makes a positive contribution to their significance The GII* Church of All Saints at Brantingham should also be considered due to its prominent position below South Wold. The proposals have the potential to affect the setting of these heritage assets and the applicant should fully assess the contribution setting makes to the significance of these assets in order to fully understand any harm that may result from the proposals. Should undergrounding be required in this section due to other constraints, such as the designation of the Yorkshire Wolds AONB, then it will resolve any setting issues outlined above, although clearly further archaeological mitigation will be required.	The assessment of the significance of the assets referred to and the contribution made by setting to that significance is provided in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report**. In relation to the Church of St Peter in Rowley, this found that the Project has the potential to result in an impact to significance. The assessment provided in **6.10 Chapter 6 Cultural Heritage** identified likely residual negligible adverse effects during construction and operation of the Project, which are not significant. In relation to the Church of All Saints in Brantingham the assessment of the setting of that asset in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report** found that there was no capacity for the Project to result in impacts to that assets as a result of changes to its setting and it was scoped out of further assessment in **6.10 Chapter 6 Cultural Heritage**.
Section 3: A63 dual carriageway - River Ouse crossing	
The setting of GII listed buildings should be assessed by the applicant.	The assessment of the significance of Grade II listed buildings within the defined study area and the contribution made by setting to that significance is provided in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report**.
Section 4: River Ouse crossing	
The Hall Garth moated site (NHLE 1013190), associated drainage channels and fishpond scheduled monument lies within the corridor at Ousefleet on the south bank of the river Humber. Hall Garth moated site is well preserved and is slightly unusual in having two enclosed islands. The monument should be avoided, and the route targeted in another part of the corridor if possible, subject to other constraints. If undergrounding was being considered in this section of the route, and	Consideration was given during the pre-application consultations to impacts on the scheduled monument at Hall Garth, but constraints on alternative alignments are such that likely significant effects are predicted. This aspect of the Project has been the subject of further consultation with Historic England since the Scoping Stage, who have acknowledged the efforts made to avoid and minimise impact on the

Historic England Comment	National Grid Response
it is appreciated this is unlikely, then this would not be viable in the vicinity of the scheduled monument. Setting of GII listed buildings should also be assessed by the applicant	asset, and also acknowledging the constraints on alternative alignments.
Section 5: River Ouse crossing to Luddington	
If the new line is to lie to the east of the existing pylons attention should also be paid to the setting of Ardingfleet Church of All Saints Grade I NHLE 1083144 and the associated scheduled Medieval Rectory NHLE 1016933 and Conservation Area etc. If the western path is selected through this section as preferred in the consultation text then the following comment will be of greater relevance as would the comment above in respect of Hall Garth moat. The spire of the Grade II listed Church of St Oswald Luddington is an important landscape features and pylon positioning in juxtaposition should be conserved closely in particular on the kinetic views along the track from the Halenby Park House GII crossing the B1392 and on approach to the church.	Further consultation with Historic England has been undertaken since the Scoping stage to discuss the final route alignment. In this Historic England noted that the route taken appears on balance across heritage assets and other constraints to be the most reasonable. The assessment of the significance of the assets referred to and the contribution made by setting to that significance is provided in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report**. In relation to Adlingfleet Conservation Area, the Church of All Saints and associated scheduled rectory in Adlingfleet, this found that the Project has the potential to result in impacts to their significance. The assessment provided in **6.10 Chapter 6 Cultural Heritage** identified likely residual negligible adverse effects during construction and operation of the Project on the scheduled rectory, which are not significant, and negligible adverse effects during construction and minor adverse effects during operation of the conservation area and the Church of All Saints, which are also not significant. In relation to the Church of All Oswald in Luddington the assessment of its setting in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report** found that the Project has the potential to result in impacts to its significance. The assessment provided in **6.10 Chapter 6 Cultural Heritage** identified likely residual minor adverse effects during construction and operation of the Project, which are not significant.

Historic England Comment	National Grid Response
Section 6: Luddington to M180 motorway	
The section passing Crowle, Belton and Epworth has considerable scope for impact upon the landscape where it potentially draws the existing visual impact of infrastructure around Keadby closer to these settlements in their strip field landscape context. Broadly, the more the new line can be pressed eastwards away from Crowle, Belton and Epworth the better both in terms of the setting of designated assets and conservation areas and the wider strip field landscape as set in relation to the historic settlements. Visual landscape impacts would be reduced by undergrounding although other archaeological considerations would also require consideration.	Further consultation with Historic England has been undertaken since the Scoping stage to discuss the final route alignment. In this Historic England noted that the route taken appears on balance across heritage assets and other constraints to be the most reasonable. The assessment of the significance of assets in the settlements and landscape around Crowle, Belton and Epworth and the contribution made by setting to that significance is provided in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report**. Likely residual effects resulting form the Project are provided in **6.10 Chapter 6 Cultural Heritage**
Section 7: M180 motorway to Graizelound	
The section passing Crowle, Belton and Epworth has considerable scope for impact upon the landscape where it potentially draws the existing visual impact of infrastructure around Keadby closer to these settlements in their strip field landscape context. Broadly, the more the new line can be pressed eastwards away from Crowle, Belton and Epworth the better both in terms of the setting of designated assets and conservation areas and the wider strip field landscape as set in relation to the historic settlements. Visual landscape impacts would be reduced by undergrounding although other archaeological considerations would also require consideration. Views east for instance from the vicinity of the grade 1 Church of St Andrew Epworth NHLE 1068692 are of particular importance to the appreciation of the village in its strip field landscape context and underscore the importance of grouping the new overhead line as closely with the existing as possible (unless and underground solution can be pursued sustainably. The village of Beltoft with its grade I listed Hall and Blacksmiths Forge has the M180 to its north and the exiting overhead line immediately to its east, a new line immediately to the west would tend to a sense of visual enclosure. However, the significance of the	Further consultation with Historic England has been undertaken since the Scoping stage to discuss the final route alignment. In this Historic England noted that the route taken appears on balance across heritage assets and other constraints to be the most reasonable. The assessment of the significance of the assets referred to in this consultation response and the contribution made by setting to that significance is provided in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report**. Likely residual effects resulting form the Project are provided in **6.10 Chapter 6 Cultural Heritage**

Historic England Comment	National Grid Response
former designed landscape north-east of Belton at Temple Belwood / Belwood House (bisected by the M180) but including the GII listed Belwood Obelisk NHLE 1083288 argues for keeping the route a far east as possible. We note that the proposed corridor runs on the west side of the existing passing between High Melwood and Low Melwood on the western side of the existing overhead line. The existing line passes close to Axholme Carthusian Priory Scheduled Monument NHLE 1017487, this monument is most sensitive in views eastwards hence it is important that the new line stays on the west of the existing. Likewise, the tighter in the new line can come on the western side of the existing overhead line the better as it passes between Haxey / East Lound to the west and Ownston Ferry to the east. Note the proximity of the existing line to the scheduled Kinaird motte and bailey castle NHLE 1017556 and associate Grade I listed Church of St Martin NHLE 1083261.	
Section 8: Graizelound to Chesterfield Canal	
We note the arc required to avoid Misterton (the setting of the Grade I listed CHURCH OF ALL SAINTS NHLE 1302717. Section 9: Chesterfield Canal to A620 As the path come back to the east it will be important to closely assess and consider in route planning views out from and to Beacon Hill Camp - Gringley on the Hill scheduled monument NHLE 1003241 versus impacts of passing closer to Beckingham. Initial consideration the topography bounding character of the A631 would tend to favour the more eastern route. Section 10: A620 to Fledborough The Grade I listed ruined Church of St Helen South Wheatley NHLE 1216694 in particular its tower is a prominent landmark conserved with HE grant aid and cared for by the Parochial Church Council at North Wheatley. It appears that the new line would pass close and we are concerned at potential impacts upon the monument's significance - detailed analysis will be required to find the best line and pylon positions. Avoidance of Sturton le Steeple and setting impacts upon the GII* listed Church of St Peter and Paul is	Further consultation with Historic England has been undertaken since the Scoping stage to discuss the final route alignment. In this Historic England noted that the route taken appears on balance across heritage assets and other constraints to be the most reasonable. The assessment of the significance of the assets referred to in this consultation response and the contribution made by setting to that significance is provided in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report**. Likely residual effects resulting from the Project are provided in **6.10 Chapter 6 Cultural Heritage**

Historic England Comment	National Grid Response
important. The A57 crossing passes east of Darlton and its Grade II* listed Church of St Giles 1212465 (currently closed and awaiting a scheme of reuse) the proposed line runs between the Church and the scheduled earthwork remains of Whimpton Moor Medieval Village NHLE 1017567. This is a delicate setting location and views across the church looking from its west (Darlton) side and from Whimpton Moor should be considered with refence both to the detail of the new overhead route and the location of pylons. The hamlet of Fledborough set in an intimate relationship to the Trent is a site of both high archaeological interest and landscape importance. The setting of the Grade I listed CHURCH OF ST GREGORY NHLE 1045689 and the associated Grade II listed Manor House NHLE 1276572 requires close attendance in the planning both the overhead line and associated works. Note the undesignated but potentially nationally important medieval village remains at Woodcotes our ref HOB UID 322858	
Archaeological field work and detailed setting assessment	
An iterative approach is required including targeted geophysical survey and trench evaluation as components of archaeological assessment, but other work necessary would be likely to include (but not be limited to) cartographic and historic sources, aerial photo and lidar evaluation, deposit modelling, Historic Environment Record (HER) and Portable Antiquities Scheme (PAS) data, targeted archaeological metal detector survey and detailed site specific setting work. Key to the success of an archaeological strategy in managing both archaeological and project delivery risks is that from the earliest stage opportunities for best and earliest understanding of the resource are pursued. There will never be a point where all unexpected discoveries can be avoided on schemes of this scale but through the targeting of areas of greatest archaeological and engineering complexity as early as possible and the timetable of intrusive investigations as early as can be achieved many problems	As part of the iterative approach to consultation and design, Historic England has been consulted on the location and design of works and compounds, and micro siting and refinements have been made where achievable. Measures to protect the historic environment are set out in **Application Document 7.3 Register of Environmental Actions and Commitments, Application Document 7.9 Outline Archaeological Written Scheme of Investigation** and **Application Document 7.10 Cultural Heritage Management Plan**, secured by Requirement in **Application Document 3.1 Draft Development Consent Order**. A Statement of Common Ground between National Grid and Historic England is submitted as **Application Document 5.8.2 – Historic England**.

Historic England Comment	National Grid Response
can be avoided. In particular we find large schemes are vulnerable to timetable compression where insufficient time becomes available for late evaluation works to inform design or to adequately support sound and well costed schemes of mitigation due to the time required for initial results to be considered and reported.	

1.10 Lincolnshire County Council

Table 1.9 – Lincolnshire County Council

Lincolnshire County Council Comment	National Grid Response
Thank you for your letter dated 21 August 2023 consulting Lincolnshire County Council, as a neighbouring authority, on the Environmental Impact Assessment Scoping Report produced by National Grid dated August 2023.	National Grid notes this feedback.
The Council have reviewed the information and have the following comments to make.	National Grid notes this feedback.
Cumulative Impacts	
The applicants approach to the assessment of cumulative effects in chapter 5 of the Scoping Report is welcomed.	National Grid notes this feedback.
In respect of the assessment of inter project effects, the Stage 1 assessment zone of influence (ZOI) should be sufficient in extent to capture relevant projects within the Lincolnshire geographical boundary. This assessment should include a review of planning applications and the development plan in Lincolnshire and also include other projects that are currently proposed through the Development Consent Order (DCO) process.	The assessment of inter-project cumulative effects is set out in **Application Document 6.21 Chapter 21 Inter-project Cumulative Effects**. This sets out the approach to the application of the ZOI and includes relevant projects within Lincolnshire County Council and those listed on the Planning Inspectorates website.
Consideration should be given to the cumulative effects with other NSIP schemes such as Cottam, West Burton and Gate Burton solar schemes, which are currently at pre examination and examination stage.	**Application Document 6.21 Chapter 21 Inter-project Cumulative Effects** has considered all relevant developments within the ZOI.
In establishing the ZOI the applicant should be mindful of the geographical scale of some of the NSIP developments proposed and that a doubling of the maximum study area may not be sufficient to identify the full extent of the development or the potential	**Application Document 6.21 Chapter 21 Inter-project Cumulative Effects** sets out the approach to the application of the ZOI. It is considered that doubling the maximum study area is sufficient to identify the long list of 'other existing and, or approved developments'

Lincolnshire County Council Comment	National Grid Response
cumulative impacts which could occur over a much wider geographical area.	whose study areas may overlap with the area within which the Project could result in a potential effect for most topics.
Table 5.5 of the Scoping Report sets out the 'Largest study areas for environmental topics'. The Council notes that the study area for transport and traffic is set at ≤ 0.5 km, which would equate to a ZOI of 1 km. This distance is unlikely to be sufficient to identify any potential impacts within Lincolnshire.	The ZOI has been updated as part of this CEA to take account of any changes to the study areas of the environmental topic chapters from comments received from stakeholders. A bespoke approach has been applied to the ZoI for traffic and transport which has identified other existing and/ or approved developments likely to use the same Construction Traffic Routes or to interact with the same PRoW.
The Council would expect the ES to contain a separate chapter on the assessment of cumulative effects covering both intra project and inter projects effects which in addition to setting out the approach and methodology clearly identifies other relevant projects and the potential for cumulative effects, any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources. It should also provide an assessment of the significance of the potential cumulative impacts identified, likely duration of the impacts (including phasing details) and mitigation measures.	The assessment of intra-project cumulative effects is presented in **Application Document 6.20 Intra-project Cumulative Effects** and the assessment of inter-project cumulative effects is presented in **Application Document 6.21 Inter-project Cumulative Effects**. These provide and assessment of significance which includes likely duration, where in the case of inter-project cumulative effects sufficient information is available about the other existing and/ or approved developments to be able to make a judgement.
Landscape and Visual	
It is noted the both the landscape and visual study area extends into areas within the Lincolnshire boundary. Considering the proximity of the Lincolnshire boundary to the project scoping boundary (which in parts is less than 3km) there is potential for the development to indirectly impact on the wider landscape character and/or setting in Lincolnshire, particularly in respect of cumulative landscape impacts and impacts on visual amenity. The applicant is advised to consult with the County Council and West Lindsey District Council to ascertain whether there are any landscape areas, sensitive receptors or viewpoints from within the Lincolnshire boundary that should be included in the landscape and visual assessments.	Lincolnshire County Council and West Lindsey District Council were consulted as part of the Statutory Consultation under Section 42 of the Planning Act 2008. The effects on landscape character are presented in **Application Document 6.6 Chapter 6 Landscape** and includes consideration of effects on two Areas of Great Landscape Value (AGLV) located in close proximity to the Lincolnshire boundary (Laughton Woods and Scotton Common AGLV, and Northeast and East of Gainsborough AGLV).

Lincolnshire County Council Comment	National Grid Response
Paragraphs 6.2.11 and 7.2.8 of the Scoping Report sets out the planning policy context. Lincolnshire County Council should be included as it also lies within 10 kms of the project.	As set out in the methodologies set out in **Application Document 6.6.A2 Appendix 6.2 Landscape Methodology** and **Application Document 6.7.A2 Appendix 7.2 Visual Methodology**, the study area for the landscape and visual assessments is 5 km
The applicant is advised to review 'The Historic Landscape Characterisation Project for Lincolnshire' which should be included as a data source and can be found on the Council's website here: https://www.lincolnshire.gov.uk/historic-environment/historic-landscape-characterisation	The Historic Landscape Characterisation Project for Lincolnshire was used as a background study to inform the baseline and assessment of landscape, visual, and community area effects.
Heritage	
Consideration should be given to using a study area greater than 1km, the Council is concerned that this distance may not be sufficient to identify heritage assets, their settings and important views that maybe impacted upon in Lincolnshire. There are a number of listed buildings, a scheduled monument and conservation areas located directly on or close to the Lincolnshire / Nottinghamshire boundary that could potentially be impacted upon by the development.	A 1 km study area from the Order Limits has been used to collect data on non-designated archaeological assets, comprising buried and above-ground archaeological remains, plus information on archaeological investigations, including desk-based assessments and fieldwork surveys. These contextual data contributed to the understanding of archaeological baseline conditions reported in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report**. The data captured within the 1 km study area from the Order Limits is considered sufficient to identify known archaeological remains within, or in proximity to, the Order Limits and to inform the likelihood of encountering previously unknown archaeological remains. As such, it is appropriate for assessing likely significant effects to buried archaeological remains. A 1 km study area from the lateral Limits of Deviation (LoD) of the proposed overhead line has been used to assess likely significant effects to designated and non-designated heritage assets as a result of changes to their setting. This study area, which is measured from the LoD for the proposed overhead line rather than the Order Limits, recognises that potential significant effects from setting change are

Lincolnshire County Council Comment	National Grid Response
	more likely to arise from the operational presence of the Project's permanent infrastructure, comprising the proposed pylons and overhead line. Measuring from the LoD for the proposed overhead line ensures that a worst-case level of change to setting is assessed. Significant effects from setting change to heritage assets beyond the 1 km study area from the LoD of the proposed overhead line are less likely due to the distance involved. However, for heritage assets of the highest sensitivity and value (i.e., World Heritage Sites, Grade I and II* listed buildings, Registered Battlefields, Grade I and II* Registered Parks and Gardens (RPG), scheduled monuments, and conservation areas containing a notable concentration of highly designated assets), there is a greater potential for change owing to their greater sensitivity and as their setting can extend over a larger area. In recognition of this, a wider study area of 3 km from the lateral LoD of the proposed overhead line is used to assess likely significant effects to heritage assets of the highest value. The study areas are illustrated on **Application Document 6.10.F1 Figure 10.1 Designated Heritage Assets within Study Areas**; **Application Document 6.10.F2 Figure 10.2a Non-designated Heritage Archaeological Assets within 1 km Study Area**, and **Application Document 6.10.F2 Figure 10.2b Non-designated Built Heritage Assets within the 1 km study area**.
Considering the proximity of the Lincolnshire County boundary, the applicant is advised to review the Historic Environment Record (HER) held by Lincolnshire County Council and it should be included as a data source. Further information on the HER can be found on the Council's website here: https://www.lincolnshire.gov.uk/historic-environment/historic-environment-record	HER data maintained by the local planning authorities through which the proposed overhead line passes, plus a 1 km study area from the Order Limits has been consulted and has informed the desk-based assessment presented in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report**. The route of the proposed overhead line has changed since Scoping and the Lincolnshire County Council area no longer falls within the defined study area for the cultural heritage assessment of non-designated heritage assets.

Lincolnshire County Council Comment	National Grid Response
Traffic and Transport	
The Scoping Report in section 13.4 identifies key highway links of which a number route through Lincolnshire on predominantly single carriageway A-Roads. Consideration should therefore be given to traffic routing for construction traffic and how this is likely to impact on the Lincolnshire road network, amenity and the combined effects of construction traffic with other developments. The engagement with local authorities in respect of traffic and transport at paragraph 13.2.9 of the Scoping Report is noted. The Council would expect the Lincolnshire Highway Authority to be included in this consultation.	An assessment of transport users on all construction traffic routes presented in **Application Document 6.4.F2 Figure 4.2 Construction Traffic Routes** is set out in **Application Document 6.14 Chapter 14 Traffic and Transport**.
To date the applicant has had very little discussion with the County Council and it is expected that more dialogue will take place with the neighbouring authorities as the project proceeds through the pre-application stage.	National Grid notes this feedback.
Should you have any queries please do not hesitate to contact me.	National Grid notes this feedback.

1.11 Maritime and Coastguard Agency

Table 1.10 – Maritime and Coastguard Agency

Maritime and Coastguard Agency Comment	National Grid Response
Thank you for your letter dated 21 August 2023 inviting comments on the Scoping Report for the proposed North Humber to High Marnham project. The Scoping Report has been considered by representatives of UK Technical Services Navigation, and the Maritime and Coastguard Agency (MCA) would like to respond as follows:	National Grid notes this feedback.
The MCA has an interest in the works associated with the marine environment, and the potential impact on the safety of navigation, access to ports, harbours and marinas and any impact on our search and rescue obligations. The MCA would expect the impact of works in or over the marine environment to be subject to the appropriate consents under the Marine and Coastal Access Act 2009 before carrying out any marine licensable works.	National Grid notes this feedback.
We note that the project involves the creation of a transmission network between a new substation close to the existing Creyke Beck Substation, and a new substation close to the existing High Marham Substation in Nottinghamshire. This would be achieved by the installation of a new 400 kilovolt electricity transmission line over a distance of approximately 90 kilometres.	National Grid notes this feedback.
The study area crosses the catchment of numerous watercourses within the Humber River Basin, including the River Ouse, River Thorne, the North and South Soak Drains, and the River Idle. These waterways have several attributes that could be affected by the project, including navigation and impact on other marine users. The MCA would expect the impact of the project on other users of the rivers and waterways to be considered as the project progresses.	The application for development consent is supported by **Application Document 7.22 Navigational Risk Assessment** which has been use to inform the assessment of the users of navigable waterways presented in **Application Document 6.17 Chapter 17 Socio-economics, Recreation and Tourism**.

Maritime and Coastguard Agency Comment	National Grid Response
It is our understanding that the location of the crossing over the River Ouse falls within the jurisdiction of ABP Humber as Statutory Harbour Authority (SHA). They are therefore responsible for maintaining the safety of navigation during the construction and the operational phase of the project. The overhead cable will also cross other waterways such as the Market Weighton Canal where The Environment Agency has responsibilities. The MCA would therefore expect the relevant navigation authority to be consulted as the project progress, with regards to overhead clearances and any works proposed in the watercourse. We would point the developers in the direction of the Port Marine Safety Code (PMSC) and its Guide to Good Practice. They will need to liaise and consult with the SHA and develop a robust Marine Safety Management System for the project under this code.	**Application Document 7.22 Navigational Risk Assessment** documents the engagement with the relevant navigation authorities for the navigable waterways that will be affected by the Project during its construction.
It is likely on this occasion that the impact on other marine users can be addressed through suitably worded conditions at the formal marine licence application stage.	National Grid notes this feedback.
We hope you find this useful at scoping stage.	National Grid notes this feedback.

1.12 NATS Safeguarding

Table 1.11 – NATS Safeguarding

NATS Safeguarding Comment	National Grid Response
The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.	National Grid notes this feedback.
However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.	National Grid notes this feedback.
If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.	National Grid notes this feedback.

1.13 Natural England

Table 1.12 – Natural England

Natural England Comment	National Grid Response
Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 21 August 2023, received on 21 August 2023.	National Grid notes this feedback.
Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.	National Grid notes this feedback.
A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.	Assessments of effects on relevant important ecological features are presented in **Application Document 6.8 Chapter 8 Ecology** and **Application Document 6.9 Chapter 9 Ornithology**. The assessments were informed by relevant desk study and field survey data.
Natural England have been engaged by the applicant regarding this project via a Service Level Agreement. Natural England will continue to provide advice via this agreement throughout the development of the proposals.	National Grid notes this feedback.
Annex A – Natural England Advice on EIA Scoping	
1 – General Principles	
Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:	National Grid notes this feedback.

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

Natural England Comment	National Grid Response
particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment • A description of the measures envisaged to prevent, reduce and where possible • offset any significant adverse effects on the environment • An outline of the structure of the proposed ES	
Through our discussions with the applicant to date we are confident that the general principles are likely to be addressed within the Environmental Statement.	National Grid notes this feedback.
2 – Cumulative and in-combination effects	
It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications.	Potential cumulative effects are set out in **Application Document 6.20 Chapter 20 Intra-project Cumulative Effects** and **Application Document 6.21 Chapter 21 Inter-project Cumulative Effects**.
An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information): a. existing completed projects b. approved but uncompleted projects c. ongoing activities d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are	Potential cumulative inter-project effects are set out in **Application Document 6.21 Chapter 21 Inter-project Cumulative Effects** this explains the methodology which has been used and the types of other development that have been considered in the assessment.

Natural England Comment	National Grid Response
likely to progress before completion of the development and for which sufficient information is available to assess th likelihood of cumulative and in-combination effects.	
In particular, Natural England would like to refer to the high development pressure around the Humber Estuary. The impacts of this proposal in combination with other projects (NSIPS and TCPA projects) along the Humber must be considered within the ES. Especially, projects with the potential to impact functionally linked land should be considered.	Potential cumulative inter-project effects are set out in **Application Document 6.21 Chapter 21 Inter-project Cumulative Effects** this has considered other developments within the Zone of Influence (ZOI) which includes other development along the Humber Estuary and the potential for cumulative effects on functionally linked land.
3 – Biodiversity and Geodiversity	
The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.	**Application Document 6.8 Chapter 8 Ecology** presents an assessment of effects on relevant important ecological features that could result from the Project. The BNG assessment is presented in **Application Document 7.1 Biodiversity Net Gain Report**.
Ecological Impact Assessment (EcIA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).	**Application Document 6.8 Chapter 8 Ecology** presents an assessment of effects on relevant important ecological features that could result from the Project. The impact assessment has been carried out in accordance with best practice guidance for EcIA, issued by CIEEM (CIEEM, 2024).
Public authorities who operate in England must consider what they can do to conserve and enhance biodiversity in England. This is the strengthened 'biodiversity duty' that the Environment Act 2021 introduces.	National Grid notes this feedback.
This means that, as a public authority, National Grid must: 1. Consider what they can do to conserve and enhance biodiversity 2. Agree policies and specific objectives based on their consideration 3. Act to deliver their policies and achieve their objectives	National Grid notes this feedback.

Natural England Comment	National Grid Response
4 – International and European sites	
The development site is within or may impact of the following European/internationally designated nature conservation sites**:** • Humber Estuary SAC • Humber Estuary SPA • Humber Estuary Ramsar • Thorne and Hatfield Moors SPA • Thorne Moor SAC • Hatfield Moor SAC	**Application Document 6.8 Chapter 8 Ecology** and **Application Document 6.9 Ornithology** present assessments of effects on relevant important ecological features, which include the designated sites listed. The potential for adverse effect on the site integrity of the sites listed is presented in **Application Document 5.2 Habitat Regulations Assessment Report**.
The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA. Natural England have provided advice directly to the applicant regarding the possible impact pathways for each of the above sites.	**Application Document 6.8 Chapter 8 Ecology** and **Application Document 6.9 Ornithology** present assessments of effects on relevant important ecological features, which include the designated sites listed. The potential for adverse effect on the site integrity is presented in **Application Document 5.2 Habitat Regulations Assessment Report**. This includes consideration of potential pathways to Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA.
Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects. **Site name** Humber Estuary SAC, Humber Estuary SPA & Humber Estuary Ramsar **Potential impact pathways where further information/assessment is required** The cable route crosses the Humber Estuary. This introduces possible impacts via a number of pathways. Natural England consider	This is presented in **Application Document 5.2 Habitats Regulations Assessment Report**.

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

Natural England Comment	National Grid Response
Ornithology Interest (SPA) • Disturbance at, or Loss or damage to, functionally Linked Land Habitat Interest (SACs) • Water quality impacts during construction	
5 – Nationally designated sites	
Sites of Special Scientific Interest	
The development site is within or may impact on the following **Site of Special Scientific Interest:** • Humber Estuary SSSI • Hatfield Moors SSSI • Thorne, Crowle and Goole Moors SSSI • Brantingham Dale SSSI • River Idle Washlands SSSI • Sutton and Lound Gravel Pits SSSI • Treswell Wood SSSI • Misson Training Area SSSI • Misson Line Bank SSSI • Chesterfield Canal SSSI • Mother Drain, Misterton SSSI • Ashtons Meadow SSSI • Clarborough Tunnel SSSI • Hewson's Field SSSI • Rush Furlong SSSI • Eastoft Meadow SSSI • Haxey Grange Fen SSSI • Crowle Borrow Pits SSSI	Effects on relevant SSSIs are assessed in **Application Document 6.8 Chapter 8 Ecology** and **Application Document 6.9 Ornithology** and are summarised in **Application Document 6.8.A11 Appendix 8.11 Summary of Assessments for Sites of Special Scientific Interest**

Natural England Comment	National Grid Response
The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. Natural England have provided advice directly to the applicant regarding the possible impact pathways for each of the above SSSIs. A summary of Natural England's advice relating to each site can be found in Table 2 Below. **Site name** Humber Estuary SSSI **Potential impact pathways where further information /assessment is required** See Humber Estuary SAC/SPA/Ramsar in table 1. **Site name** Hatfield Moors SSSI & Thorne, Crowle and Goole Moors SSSI **Potential impact pathways where further information /assessment is required** See Thorne and Hatfield Moors SPA and Thorne Moor and Hatfield Moor SAC in table 1. **Site name** Brantingham Dale SSSI **Potential impact pathways where further information /assessment is required** The cable route passes close to, or may pass over the top of, this SSSI. There are thus possible impacts from: • Habitat loss, where pylons are sited within the SSSI, or during construction where cables are raised above the SSSI. • Impacts may also occur as a result of air pollution from construction traffic or dust mobilisation.	Effects on relevant SSSIs, due to both direct and indirect impacts are assessed in **Application Document 6.8 Chapter 8 Ecology** and **Application Document 6.9 Ornithology**. Appropriate mitigation is outlined in these documents and in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**. A summary of effects on SSSIs is presented in **Application Document 6.8.A11 Appendix 8.11 Summary of Assessments for Sites of Special Scientific Interest**.

Natural England Comment	National Grid Response
Site name River Idle Washlands SSSI & Sutton and Lound Gravel Pits SSSI **Potential impact pathways where further information /assessment is required** Despite the separation between these SSSI's and the cable route, due to the mobile nature for the species for which the SSSI's are notified, consideration should be given to: • Noise and visual disturbance • Collision risk **Site name** Treswell Wood SSSI **Potential impact pathways where further information /assessment is required** This site lies adjacent to the cable route, giving rise to possible impacts from: • Direct disturbance to habitats during construction • Air pollution impacts from construction traffic or dust mobilisation. • Noise and visual disturbance to breeding birds associated with the SSSI. • Collision risk to breeding birds associated with the SSSI. **Site name** Misson Training Area SSSI & Misson Line Bank SSSI **Potential impact pathways where further information /assessment is required** These sites lie within proximity to the cable route at sections 8 and Possible impacts include: • Air pollution impacts from construction traffic or dust mobilisation.	

Natural England Comment	National Grid Response
• Noise and visual disturbance to breeding birds associated with the SSSI. • Collision risk to breeding birds associated with the SSSI **Site name** Chesterfield Canal SSSI & Mother Drain, Misterton SSSI **Potential impact pathways where further information /assessment is required** Cable route section 8 passes over Chesterfield Canal, and passes adjacent to Mother Drain, Misterton. The notified interest of these SSSIs lies in their habitats and so possible impacts are limited to: • Habitat loss or damage during construction. • Pollution events and changes to water quality within the watercourses. • Air pollution impacts from construction traffic or dust mobilisation. **Site name** Crowle Borrow Pits SSSI **Potential impact pathways where further information /assessment is required** This SSSI lies adjacent to cable route section 6. Impacts pathways include: • Changes to site hydrology or water quality, due to open water features & wetland habitat interest. • Air pollution impacts from construction traffic or dust mobilisation **Site name** Ashtons Meadow SSSI, Clarborough Tunnel SSSI, Hewson's Field SSSI, Rush Furlong SSSI, Eastoft Meadow SSSI & Haxey Grange Fen SSSI **Potential impact pathways where further information /assessment is required**	

Natural England Comment	National Grid Response
These SSSIs are separated from the cable route, and are notified for their habitat interest. Possible impact pathways are limited to: • Air pollution impacts from construction traffic or dust mobilisation.	
Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on SSSIs and their special interest features can be found at www.magic.gov .	National Grid notes this feedback.
Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.	National Grid notes this feedback
6 – Regionally and Locally Important Sites	
The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 174 and 175). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.	**Application Document 6.8 Chapter 8 Ecology** presents an assessment of effects on relevant important ecological features, including local statutory and non-statutory designated sites. Appropriate mitigation is outlined in **Application Document 6.8 Chapter 8 Ecology** and in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.
7 – Protected Species	
The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.	**Application Document 6.8 Chapter 8 Ecology** presents an assessment of effects on relevant important ecological features, including protected and notable species. The assessment was informed by a desk study (including record centre data) and field surveys. Appropriate mitigation is outlined in **Application Document 6.8 Chapter 8 Ecology**, **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.

Natural England Comment	National Grid Response
The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.	**Application Document 6.8 Chapter 8 Ecology** presents an assessment of effects on relevant important ecological features, including protected and notable species. The assessment was informed by a desk study and field surveys, carried out by suitably experienced (and licenced where required) ecologists at the appropriate times of year. Appropriate mitigation is outlined in **Application Document 6.8 Chapter 8 Ecology**, **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.
Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.	Protected species licences will be obtained from Natural England as required, which will be informed by up-to-date pre construction surveys.
Applicants should check to see if a mitigation licence is required using NE guidance on licencing NE wildlife licences. Applicants can also make use of Natural England's charged service Pre Submission Screening Service for a review of a draft wildlife licence application. Natural England then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. Work relating to a LONI may be undertaken via the existing Service Level Agreement between the Applicant and Natural England. Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning contains details of the LONI process.	National Grid notes this feedback.
8 – District Level Licensing for Great Crested Newts	
The applicant has expressed an interest in entering into a District Level Licence agreement.	The Project has agreed with Natural England that a district level licence (DLL) can be issued to cover any potential impact on GCN

Natural England Comment	National Grid Response
Where strategic approaches such as district level licensing (DLL) for great crested newts (GCN) are used, a letter of no impediment (LONI) will not be required. Instead, the developer will need to provide evidence to the Examining Authority (ExA) on how and where this approach has been used in relation to the proposal, which must include a counter-signed Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England, or a similar approval from an alternative DLL provider.	and ensure legal compliance for the Project within the East Riding of Yorkshire and North Lincolnshire. The Project has started the DLL application process and is liaising closely with Natural England on this matter. As part of the application process all survey data have been, and will continue to be, shared with Natural England to allow Natural England to define appropriate mitigation measures such as the creation of new ponds and habitat improvements which will be implemented (by Natural England) through the DLL. Consequently, assessment of this species within the East Riding of Yorkshire and North Lincolnshire is not required to be included within the Environmental Statement (ES) as they would be fully mitigated for as part of the DLL and can therefore be scoped out of detailed assessment. However, Natural England cannot offer DLL for any projects in Nottinghamshire. Therefore, in an approach agreed by Natural England, the Project will seek a European Protected Species Licence (EPSL) for Nottinghamshire only. As such **Application Document 6.8 Chapter 8 Ecology** contains an assessment of the potential effects of the Project on GCN in Nottinghamshire only, supported by the baseline data and information relating to GCN and waterbodies located in Nottinghamshire presented **Application Document 6.8.A10 Appendix 8.10 Great Crested Newt Report for Nottinghamshire**.
The DLL approach is underpinned by a strategic area assessment which includes the identification of risk zones, strategic opportunity area maps and a mechanism to ensure adequate compensation is provided regardless of the level of impact. In addition, Natural England (or an alternative DLL provider) will undertake an impact assessment, the outcome of which will be documented in the IACPC (or equivalent).	
If no GCN surveys have been undertaken, Natural England's risk zone modelling may be relied upon. During the impact assessment, Natural England will inform the Applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN. The IACPC will also provide additional detail including information on the Proposed Development's impact on GCN and the appropriate compensation required.	
By demonstrating that the DLL scheme for GCN will be used, consideration of GCN in the ES can be restricted to cross-referring to the Natural England (or alternative provider) IACPC as a justification as to why significant effects on GCN populations as a result of the Proposed Development would be avoided.	
It should be noted that at present, there is only an active DLL scheme in the Yorkshire and North Lincolnshire areas of the project. No scheme is active in Nottinghamshire. A DLL scheme is planned to be	

Natural England Comment	National Grid Response
launched within Nottinghamshire, however the exact timescales of this are currently unknown. Natural England would encourage engagement from the applicant regarding DLL as soon as possible, to ensure entry into the scheme is feasible for the full length of the project.	
9 – Priority Habitats and Species	
Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.	**Application Document 6.8 Chapter 8 Ecology** presents an assessment of effects on relevant important ecological features, including protected and notable species and habitats. The assessment was informed by a desk study and field surveys, carried out by suitably experienced (and licenced where required) ecologists at the appropriate times of year.
Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available here.	**Application Document 6.8 Chapter 8 Ecology** presents an assessment of effects on relevant important ecological features, including protected and notable species and habitats. The assessment was informed by a desk study and field surveys, carried out by suitably experienced (and licenced where required) ecologists at the appropriate times of year.
An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.	**Application Document 6.8 Chapter 8 Ecology** presents an assessment of effects on relevant important ecological features, including protected and notable species and habitats. The assessment was informed by a desk study and field surveys, carried out by suitably experienced (and licenced where required) ecologists at the appropriate times of year. Terrestrial invertebrate surveys were not carried out following the desk study and extended Phase 1 habitat survey. The dominant habitat type within the Order Limits is arable, which is unlikely to support notable invertebrate assemblages. Observations of notable

Natural England Comment	National Grid Response
	invertebrate species have been recorded through the desk study and during other ecological surveys. Consideration for any mitigation required for terrestrial invertebrates is included in **Application Document 6.8 Chapter 8 Ecology**.
The Environmental Statement should include details of: • Any historical data for the site affected by the proposal (e.g. from previous surveys) • Additional surveys carried out as part of this proposal • The habitats and species present • The status of these habitats and species (e.g. whether priority species or habitat) • The direct and indirect effects of the development upon those habitats and species • Full details of any mitigation or compensation measures • Opportunities for biodiversity net gain or other environmental enhancement	**Application Document 6.8 Chapter 8 Ecology** presents an assessment of effects on relevant important ecological features, including protected and notable species and habitats. The assessment was informed by a desk study and field surveys, carried out by suitably experienced (and licenced where required) ecologists at the appropriate times of year. Appropriate mitigation is outlined in **Application Document 6.8 Chapter 8 Ecology**, **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**. A BNG assessment is presented in **Application Document 7.1 Biodiversity Net Gain Report**.
10 – Ancient Woodland, ancient and veteran trees	
Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 180 of the NPPF sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists. Paragraph 2.9.19 of NPS EN-5 states that *'…applicants should: …protect as far as reasonably practicable areas of local amenity value, important existing habitats and landscape features including ancient woodland, historic hedgerows, surface and ground water sources and nature conservation areas.'*	National Grid notes this feedback.

Natural England Comment	National Grid Response
Ancient Woodland has been identified within the scoping areas for the proposed development. We welcome the intention to avoid these areas as far as practicable as the route and Order Limits are defined. The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.	**Application document 7.14 Arboricultural Impact Assessment** sets out impacts of the Project on Ancient woodland. Ancient woodland within the study area was identified through a desk-based search of the Multi Agency Geographical Information for the Countryside (MAGIC) website and impacts assessed based on Project design information. It has been assessed there are no impacts to Ancient Woodland listed on the Ancient Woodland inventory from Project. **Application document 7.14 Arboricultural Impact Assessment**, including Appendix E Veteran Tree Assessment Methodology set out impacts to veteran trees. Veteran trees within the study area were verified through a desk-based search of the Woodland Trust's Ancient Tree Inventory (ATI) and through field-based surveys carried out by suitably qualified arboriculturists. A hierarchy of avoid, minimise, remediate, compensate is detailed and sets out the methods applied for avoidance, mitigation, and compensation of retained trees. Enhancement methods for retained trees includes but is not limited to; soil decompaction, mulching and creation of wildlife boxes.
Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.	National Grid notes this feedback.
11 – Biodiversity net gain	
The Environment Act 2021 includes NSIPs in the requirement for BNG, with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. It is the intention that BNG should apply to all terrestrial NSIPs accepted for examination from November 2025. Natural England welcome National Grid's commitment to deliver 10% biodiversity Net Gain across all of their construction projects in advance of this date, including this project.	In recent years, the UK Government has introduced legislation and policy that puts biodiversity at the heart of the planning system. The Department for Environment, Food and Rural Affairs (Defra), describes Biodiversity Net Gain (BNG) as an approach to development that makes sure habitats for wildlife are left in a measurably better state than they were before development (Defra, 2026). The statutory requirement for Nationally Significant Infrastructure Projects (NSIPs) to achieve a specified biodiversity gain

Natural England Comment	National Grid Response
Biodiversity Net Gain outcomes can be achieved on-site, off-site or through a combination of both, however, on-site provision should be considered first. Natural England advise that the latest version of the biodiversity metric should be used to calculate the biodiversity impact of the development. It should be noted that the same version of the BNG metric should be used pre- and post-development to ensure consistency, as each version of the metric may give altered biodiversity unit scores as the calculator is updated.	objective (as set out in a biodiversity gain statement) will be mandatory for applications made from 2 November 2026. The biodiversity gain objective for energy NSIPs, as set out in Nationally Significant Infrastructure Projects: Biodiversity Gain Statement for Energy (Defra, 2026), will require that the biodiversity value attributable to a development exceeds the pre-development biodiversity value of the on-site habitat by at least 10%. This is referred to as 10% BNG. The Project application for development consent is being submitted prior to 2 November 2026 and therefore the provision of 10% BNG is not mandatory. Notwithstanding, the Overarching National Policy Statement for Energy (EN-1) (Department for Energy Security and Net Zero, 2025) states that NSIPs should seek opportunities to provide BNG, including wider environmental gains and benefits to local communities and national policy priorities, where possible, and the Secretary of State should give appropriate weight to environmental net gain and BNG during decision making. However,10% BNG is not a legal requirement for this application for development consent. National Grid's environmental and social commitments in its Social and Environmental Action Plan (National Grid, 2026) include a commitment to deliver a minimum of 10% BNG with potential for wider environmental and societal benefits for all developments for which planning permission or development consent is required. Therefore, the Project proposes to deliver 10% BNG with potential for wider environmental and societal benefits on a voluntary basis, and substantively follows the guidance set out in Nationally Significant Infrastructure Projects: Biodiversity Gain Statement for Energy (Defra, 2026). Detail on the Project's approach to voluntary BNG is provided in **Application Document 7.20 Design Development Report - 2025** and **Application Document 7.1 Biodiversity Net Gain Report**.
Natural England recognises the high opportunity for the development to deliver BNG and it is recommended that the following guidance is applied in order to achieve this: • Biodiversity Net Gain: Good Practice Principals for Development • BS 8683: 2021 Process for designing and implementing Biodiversity Net Gain	
In addition, the applicant should be aware of forthcoming guidance and legislation in relation to the Environment Act 2021, which may be released in the interim prior to submission of the DCO application.	
In order to maximise nature recovery and target habitat enhancement where it will have the greatest local benefit it is recommended that locally identified opportunities should be acknowledged and incorporated into the design of BNG (both on and off-site). This should include any locally mapped ecological networks and priority habitats identified by City of Doncaster Council. In addition, Local Nature Recovery Strategies (LNRS) are a new mandatory system of spatial strategies for nature established by the Environment Act 2021 which will contribute to the national Nature Recovery Network (NRN). Work is currently underway to develop these strategies, which will identify strategic priorities for nature protection, recovery, and enhancement. Given the size, scale and opportunities afforded by the application is therefore recommended that engagement with relevant local planning authorities, responsible authorities and statutory	

Natural England Comment	National Grid Response
consultees (including Natural England) is undertaken to align habitat enhancement through the development with any emerging plans and policies in relation to LNRS.	
12 – Landscape	
Nationally Designated Landscapes	
In view of the distance of the current proposals from both the Howardian Hills AONB and the Lincolnshire Wolds AONB, it is considered that effects are unlikely. With regard to Natural England's future designation projects, we are currently considering the designation of the Yorkshire Wolds, in addition to three other projects. The final boundary of this new designation is yet to be confirmed. Natural England are fully resourced and committed to these four cases and is therefore not taking on any new designation projects at the current time.	Comment noted regarding the Howardian Hills AONB and Lincolnshire Wolds AONB. In relation to the Yorkshire Wolds AONB, it is noted that on 4 February 2026, Natural England issued notice of intention to 'make' the designation Order. The Draft Yorkshire Wolds AONB (Designation) Order 2026 (Natural England, 2026) proposes an area slightly larger than the Provisional Candidate Area originally published for consultation; the area expanded in response to consultation responses. This means that the distance between the proposed boundary to the nearest point of the Limits of Deviation (LoD) is 11.4 km. At this distance, the special qualities and statutory purposes of the AONB are unlikely to be significantly affected by the Project, and no further assessment has been undertaken.
The potential for impacts to the Yorkshire Wolds would need to be considered within the ES; Natural England will continue to engage with the applicant as both the designation and the development project progress.	
Landscape and visual impacts	
The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.	The National Character Areas are considered in **Application Document 6.6 Chapter 6 Landscape** with an assessment of effects presented in **Application Document 6.6.A3 Appendix 6.3 Landscape Baseline and Assessment**. As the proposed overhead line looks to parallel existing overhead lines for much of the route, no significant effects have been identified for any of the five NCA within the study area.

Natural England Comment	National Grid Response
The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.	Regional and local landscape character areas are considered in **Application Document 6.6 Chapter 6 Landscape** with an assessment of effects presented in **Application Document 6.6.A3 Appendix 6.3 Landscape Baseline and Assessment**. The assessment has used published landscape character areas for East Riding of Yorkshire, North Lincolnshire and East Midlands to consider the effects of the proposed overhead line.
A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.	The landscape assessment presented in **Application Document 6.6 Chapter 6 Landscape** and visual assessment presented in **Application Document 6.7 Chapter 7 Visual** have been undertaken in accordance with Guidelines for Landscape and Visual Impact Assessment (GLVIA) as set out in the methodologies provided in **Application Document 6.6.A2 Landscape Methodology** and **Application Document 6.7.A2 Visual Methodology**. No National Landscape or AONB fall within the study area for the landscape or visual assessment.
The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.	The assessment of inter-project cumulative effects is set out in **Application Document 6.21 Chapter 21 Inter-project Cumulative Effects**.
To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development	As the Project does not require the construction of any buildings, local design policies, design codes and guides do not tend to be as relevant, but landscape and visual matters have been a key consideration during the design process. The design approach and principles are set out in **Application Document 5.10 Design Approach Document** which discusses how routeing has sought to minimise effects on landscape and visual receptors. This has included

Natural England Comment	National Grid Response
will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.	routeing parallel with existing overhead lines and synchronising of pylon locations where possible to reduce the spread of effects and achieve a coherent appearance in line with the Holford Rules. Consideration of alternatives is discussed in **Application Document 6.3 Chapter 3 Main Alternatives Considered**.
The National Infrastructure Commission has also produced Design Principles Design Principles for National Infrastructure - NIC endorsed by Government in the National Infrastructure Strategy.	National Grid notes this feedback.
13 – Connecting People with nature	
The ES should consider the potential impacts on the Yorkshire Wolds Way National Trail. The proposed Overhead Line passes over this National Trail; thus, the impact of the construction and operation of the scheme should be considered. The applicant should have regard to NPPF Paragraph 100 which requires planning decisions to protect and enhance National Trails. The Yorkshire Wolds Way is represented by a partnership which includes the North York Moors National Park and East Riding Council. The National Trails website www.nationaltrail.co.uk provides further information.	Impacts on walkers, cyclists and horse riders are discussed in the Environmental Statement (ES) in **Application Document 6.14 Chapter 14 Traffic and Transport**, **Application Document 6.17 Chapter 17 Socio-economics, Recreation and Tourism** and **Application Document 6.7 Chapter 7 Visual**. As part of this assessment, we have worked closely with the local authority to understand and gain information on the local PRoW network. This information has been used to inform and **Application Document 7.6 Public Rights of Way Management Plan**. An assessment of the visual effects, including the sequential effects, during operation for people using the Yorkshire Wolds Way is provided in **Application Document 6.7.A4 Appendix 7.4 Visual Baseline and Assessment**. As the Yorkshire Wolds Way passes under the new overhead line in a location where it is parallel to the existing overhead line and views are filtered by large woodland blocks, the geographical extent of effects on users of the path has been minimised. Effects on users of the Yorkshire Wolds Way are not considered to be significant in operation, although effects during construction would be significant but for a localised section of the footpath at Woo Dale.
The ES should consider potential impacts on access land, common land, public rights of way (including National Trails) and, where appropriate, the England Coast Path and coastal access routes and	**Application Document 6.17 Chapter 17 Socio-economics** includes an assessment on the likely effects on common land and PRoWs (including National Trails and promoted routes). The England Coast

Natural England Comment	National Grid Response
coastal margin in the vicinity of the development, in line with NPPF paragraph 100. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.	Path does not fall within the socio-economics study area and is such is not expected to experience any significant effect. **Application Document 7.6 Public Rights of Way Management Plan** identifies all PRoWs within and adjacent to the DCO Order Limits and outlines approaches to managing interactions between the Project and each PRoW.
Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.	As part of the Project, National Grid have tried to maintain access to the countryside through avoiding any permenant closures, and minimising the use of temporary closures of PRoWs. Where temporary closures are required, National Grid will look to manage these to allow access, where appropriate and safe to do so, and suitable diversions are to be put in place or alternative routes promoted. This is set out in further detail within the **Application Document 7.6 Public Rights of Way Management Plan.** All PRoWs subject to temporary closure will be fully reinstated to their original condition, to ensure users can continue to access the countryside and nature, following completion of the Project.
14 – Soils and Agricultural Land Quality	
Due to the scale of the project, there is potential for significant impacts to Soils and Best and Most Versatile Agricultural Land.	The significance of effects is assessed as part of the Environmental Statement in **Application Document 6.13 Chapter 13 Agriculture and Soils**. The assessment accounts for the sensitivity of the agriculture and soil receptor as well as the scale of impact. The residual effects of the Project are detailed in section 13.9 of **Application Document 6.13 Chapter 13 Agriculture and Soils**.
Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line	The assessment presented in **Application Document 6.13 Chapter 13 Agriculture and Soils** considers all relevant sections of the updated NPPF as detailed in Table 13.3.

Natural England Comment	National Grid Response
paragraphs 5.168, 5.167 and 5.179 of the NPS for National Networks. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.	
The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES): • The degree to which soils would be disturbed or damaged as part of the development. This includes during construction (i.e. siting of construction compounds • and temporary access tracks) and operation (i.e. location of pylons, permanent access tracks and supporting infrastructure). • The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.	**Application Document 6.13 Chapter 13 Agriculture and Soils** sets out the baseline in relation to Agricultural Land Classification (ALC) grades and soil resources based on the detailed ALC surveys that have been undertaken. The assessment identifies the extent of each ALC grade and soil resource that would be affected by the Project, including land required temporarily. The assessment also quantifies the total areas of agricultural land, including BMV land, that would be affected temporarily or lost permanently because of the Project.
This is likely to require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk. • Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) • supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. This may be amended for linear areas to provide an accurate depiction of the land quality along the linear area. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space). • The ES should set out details of how any adverse impacts on BMV agricultural land • can be minimised through site design/masterplan.	An Agricultural Land Classification (ALC) survey has been undertaken to inform the assessment. The survey was completed in accordance with published guidance, using auger observations at a density of one per hectare, or one per 100m along linear sections of the Project, supported by soil puts within representative soil types. The survey methodology, results and ALC mapping are presented in **Application Document 6.13.A2 Appendix 13.2 Agricultural Land Classification Survey Report**. The potential effects of the Project on agricultural land, including best and most versatile (BMV) land, and on soil resources has been assessed as part of the Environmental Statement within **Application Document 6.13 Chapter 13 Agriculture and Soils**. Measures for the sustainable handling, storage, reuse and management of soil resources are set out in **Application Document 7.5 Outline Soil Management Plan**.

Natural England Comment	National Grid Response
• The ES should set out details of how any adverse impacts on soils can be avoided or • minimised and demonstrate how soils will be sustainably used and managed. This should include consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain, as well as sustainable soil management throughout all phases of the development. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.	
Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction.	**Application Document 7.5 Outline Soil Management Plan** has been developed and submitted alongside the application, and provides details of the approaches to soil handling, based on published good practice (specifically the Defra code), along with other relevant guidance.
15 – Air Quality	
Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) [1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NOx and SO2 against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have	National Grid notes this feedback.

Natural England Comment	National Grid Response
also been identified as a tool to reduce environmental damage from air pollution.	
The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).	An assessment has been undertaken to determine if the Project is likely to have adverse effects on air quality as detailed in **Application Document 6.15 Chapter 15 Air Quality**. Mitigation measures have been proposed where required, as outlined in **Application Document 7.3 Register of Environmental Actions and Commitments**.
There is potential for this development to cause adverse impacts to designated sites via dust and vehicle emissions during the construction phase of the development. We welcome Table 14.3 of the applicant's EIA scoping document, which indicates that both of these impact pathways will be assessed within the ES.	An assessment has been undertaken to determine if the Project is likely to have adverse effects on ecological receptors. This has included consideration of dust and vehicle emissions during the construction phase, as detailed in **Application Document 6.15 Chapter 15 Air Quality**.
Ammonia emissions from road traffic could make a significant difference to nitrogen deposition close to roads. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road) – catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions – therefore consideration of the potential for impacts is needed (see https://www.aqconsultants.co.uk/news/february-2020- (1)/ammonia-emissions-fromroads-for-assessing-impacts).	Cumulative construction traffic flows have been screened against the Design Manual for Roads and Bridges (DMRB) LA 105 criteria for ecological receptors (National Highways, 2024) above which assessment of construction vehicle emissions may be required. Exceedances of the screening criteria have been identified and the Affected Road Network (ARN)[1] defined. There are no Special Areas of Conservation (SACs), possible SACs, Special Protection Areas (SPAs), Potential SPAs, Ramsar Sites, or Sites of Special Scientific Interest (SSSIs), within 200 m of the ARN. Therefore in accordance with Natural England's Standard Advice for Air Quality Impacts in Nationally Significant Infrastructure Projects
For the sections of the cable route which will involve construction traffic movements within 200m of the designated site the potential air quality impacts due to road traffic during the construction phase will need to be considered. When undertaking the assessment there will need to be clarification provided on which roads will be used to access	

[1] The Affected Road Network (ARN) describes the construction traffic routes where the screening criteria for detailed assessment of construction vehicle emissions are exceeded. As the screening criteria for human and ecological receptors differ, the ARNs described for human and ecological receptors also differ.

Natural England Comment	National Grid Response
the development site, and the number of predicted vehicle movements. Designated sites within 200m of a road which will experience a significant increase in traffic movements should be assessed for impacts due to air pollution from traffic. Natural England has produced guidance for public bodies to help assess the impacts of road traffic emissions to air quality capable of affecting European Sites. Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001	(NSIPs) [2] further detailed assessment of vehicle emissions on statutorily designated ecological sites has not been undertaken.
There are currently two models which can be used to calculate the ammonia concentration and contribution to total N deposition from road sources. One of these models is publicly available and called CREAM, and there is another produced by National Highways.	
16 – Climate Change	
The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development will embed Nature Based Solutions, maintain ecological networks and build resilience to climate change. The ES should also incorporate the policies as set out in NPS EN-1 relating to climate change. The NPPF also requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 174), which should be demonstrated through the ES.	**Application Document 7.13 Flood Risk Assessment** and **Application Document 6.11 Chapter 11 Water Environment** assess flood risk from all relevant sources, including the effects of climate change over the operational lifetime of the Project. A range of embedded controls and mitigation measures to manage climate-related risks, including flood risk, are set out in **Application Document 7.2 Outline Code of Construction Practice**. The Project also incorporates measures that support nature-based solutions, biodiversity enhancement and climate resilience. These measures are described in **Application Document 6.8 Chapter 8 Ecology** and include habitat creation, enhancement and management measures that contribute to maintaining and strengthening ecological networks and improving resilience to future climate pressures.

[2] Natural England's standard advice is not publicly available. It is however similar to that outlined in Air Pollution and Development: Advice for Local Authorities (Natural England, 2025), noting however that this particular advice is not for NSIPs.

Natural England Comment	National Grid Response
	Biodiversity benefits and net gain outcomes are further detailed within **Application Document 7.1 Biodiversity Net Gain Report**. Table 19.1 of **Application Document 6.19 Chapter 19 Climate Change** identifies the relevant requirements of NPS EN-1 and demonstrates how these have been addressed within the assessment.

1.14 Network Rail

Table 1.13 – Network Rail

Network Rail Comment	National Grid Response
Network Rail is a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates, maintains and develops the main rail network. Network Rail aims to protect and enhance the railway infrastructure therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests, will need to be carefully considered.	National Grid notes this feedback.
With reference to the protection of the railway, the Environmental Statement should consider any impact of the scheme upon the railway infrastructure and upon operational railway safety. It should also include a Transport Assessment to identify any HGV traffic/haulage routes associated with the construction and operation of the site that may utilise railway assets such as bridges and level crossings during the construction and operation of the site.	A Transport Assessment is provided at **Application Document 7.15 Transport Assessment** this this has considered where construction traffic routes cross railway assets.
In addition, should any part of the scheme require the use of, or access across railway land including the operational railway itself, the developer will be required to obtain the necessary agreements and consents (easement agreements, licences etc) from Network Rail going forward. We would strongly recommend that they engage with us early in the development of their scheme to ensure such matters are resolved well in advance.	National Grid notes this feedback and has continued to engage with Network Rail throughout the development of the Project
Network Rail would be grateful if the comments above are considered by The Planning Inspectorate. Network Rail would welcome further discussion and negotiation with The Planning Inspectorate and National Grid in relation to the proposed development as required going forward. If you have any questions or require more information in relation to the above please let me know.	National Grid notes this feedback.

1.15 Newark and Sherwood District Council

Table 1.14 – Newark and Sherwood District Council

Comment	National Grid Response
We understand that the proposal consists of works to construct a new 400 kV overhead line (OHL) between the existing Creyke Beck substation in Yorkshire and a new substation close to the existing High Marnham substation, alterations to sections of existing OHLs and associated works.	National Grid notes this feedback.
We have reviewed the Environmental Impact Assessment Scoping Report and associated information made available on your website, including the information relating to the NSDC Local Authority area, and have no comments to make	National Grid notes this feedback.
If you require any further assistance, please do not hesitate to contact me.	National Grid notes this feedback.

1.16 North and South Wheatley Parish Council

Table 1.15 – North and South Wheatley Parish Council

North and South Wheatley Parish Council Comment	National Grid Response
The very strong preference, expressed here on behalf of the Parish Council which speaks for the residents of North & South Wheatley, is for the cabling to be underground or in the River Trent, due to the extremely negative impact on our landscape of more overground pylons.	The potential for localised undergrounding has been considered as part of the Project's design. National Policy Statement (NPS) EN-5 (Department for Energy Security & Net Zero, 2025) makes clear that "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 Parks, The Broads, or Areas of Outstanding Natural Beauty)". EN-5 also confirms that widespread and significant adverse landscape and/or visual impacts in other locations may also justify the use of undergrounding. National Grid has a statutory duty to develop proposals that are economic and efficient. No widespread and significant adverse landscape and/or visual impacts have been assessed to justify the use of undergrounding. The design of the proposed overhead line has considered residential properties, how these have been taken into account at each stage of the Project's design is set out within the following: • **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.**
Clearly cost is the driver for your plans for overhead lines, however they are without doubt unsightly and represent poor value to customers and those living within sight of them. We understand that the National Grid's own website suggests that pylons are being removed in some areas due to their visual intrusion, are routinely being installed underground now and that by 2030 no more will be installed overground. Knowing this it seems extremely unfair to the residents of parts of North Nottinghamshire, who already have had to accept large power stations and associated electricity pylons, to accept more pylons which will be there forever- just before the policy of overground cabling is abandoned– **easier and cheaper is not a good enough reason now**	
In addition, with all the forecasts on how our weather will change, with more storms predicted for the future this is another excellent reason to put all new power lines underground. We refer you to this article which states cables should be under ground, (or hopefully in the River Trent) https://www.preventionweb.net/news/how-extreme-weather-threatens-bring.-down-uks-power-lines-and-halt-supply-homes	
If it really is impossible to site the cables underground in this area or in the Trent (which we dispute on the basis that we have been presented with no evidence that it is in fact impossible) then we would	

suggest that the existing pylon infrastructure / siting is used – thereby minimising any disruption and objections. Failing that the pylons could be sited closer to Littleborough – removing the Parishes of Leverton, Sturton and Wheatley from the very negative effects of new pylons. Littleborough has circa 12 houses and so there would be fewer residents affected. I refer to the earlier comment about initial consultations with people who know the area, rather than drawing lines on a map with no 'on the ground' intelligence.	
The current proposed site will be very close to a Historic Windmill at Leverton and St Helen's Church in Wheatley which is a historic building. Wheately is also in a conservation area. Whilst not having SSI status – which we understand would ultimately block any pylons – we feel that to prioritise wildlife and flora over the well being and amenity rights and safety of people cannot be justified.	These assets have been considering in the routeing of the Project. How these have been considered is set out in: • **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 effects of the Project on these assets is presented in **Application Document 6.10 Chapter 10 Historic Environment**.

1.17 North Leverton Parish

Table 1.16 – North Leverton Parish

North Leverton Parish Comment	National Grid Response
The preference, for North Leverton with Habblesthorpe Parish Council would be for the installations to be underground, due to the extremely negative impact on the landscape particularly the unspoilt rural landscape of North Leverton with Habblesthorpe, which includes a historic working windmill. Overhead pylons would be unsightly to all those living within sight of the proposed corridor. Underground cables should be used to show that you prioritise natural beauty, wildlife, biodiversity, and visual impact over cost, this would be of benefit to everyone	The potential for localised undergrounding has been considered as part of the Project's design. National Policy Statement (NPS) EN-5 (Department for Energy Security & Net Zero, 2025) makes clear that "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 Parks, The Broads, or Areas of Outstanding Natural Beauty)". EN-5 also confirms that widespread and significant adverse landscape and/or visual impacts in other locations may also justify the use of undergrounding. National Grid has a statutory duty to develop proposals that are economic and efficient. No widespread and significant adverse landscape and/or visual impacts have been assessed to justify the use of undergrounding.
The Parish Council understand that in other areas of the country pylons have been removed due to their visual intrusion so the Parish Council ask that any infrastructure installed maintains the beauty of the landscape by being installed underground	
In addition, with all the forecasts on how our weather will change with more storms predicted for the future this is another reason to put all new power lines underground. We refer you to this article which states cables should be under ground https://www.preventionweb.net/news/how-extreme-weather-threatens-bring.-down-uks- power-lines-and-halt-supply-homes	

1.18 North Lincolnshire Council Scoping Response to North Humber to High Marnham – Historic Environment Record

Table 1.17 – North Lincolnshire Scoping Response to North Humber to High Marnham – Historic Environment Record

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
Thank you for giving North Lincolnshire Council the opportunity to comment on the submitted Scoping Report in respect of the North Humber to High Marnham project. Please find attached a copy of the councils scoping response as well as a copy of the detailed advice provided by the councils Historic Environment Officer, which is summarised in the response.	National Grid notes this feedback.
Do not hesitate to contact me should you wish to discuss this matter further.	National Grid notes this feedback.
Summary of Advice	
The proposed electricity lines have the potential for indirect impacts on designated and non- designated heritage assets and their settings within North Lincolnshire including the key heritage asset of the Isle of Axholme historic landscape	National Grid notes this feedback.
The proposed route south of the A18 falls within the Isle of Axholme Area of Special Historic Landscape Interest (ASHLI) protected from adverse development under saved Local Plan Policy LC14 (North Lincs Local Plan 2003)	National Grid notes this feedback.
There is potential for direct, physical impacts on known and currently unrecorded non- designated archaeological heritage assets throughout the route including potential for well- preserved palaeo environmental evidence	An assessment of likely effects on known and unrecorded heritage assets, including those with palaeoenvironmental potential, is presented in **Application Document 6.10 Chapter 10 Cultural Heritage**.

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
The proposed methodology in the Scoping Report is inadequate as it comprises desk-based assessment without archaeological field evaluation	**Application Document 6.10 Chapter 10 Cultural Heritage** is supported by a cultural heritage desk-based assessment, presented in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report**, and the results of archaeological field evaluation. The results of the field evaluation surveys are submitted as **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report** and **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report**.
Pre-application archaeological evaluation will be necessary in North Lincolnshire to inform the EIA baseline and should comprise a staged programme of non-intrusive and intrusive fieldwork (see below) This is to identify currently unknown archaeological remains and to adequately assess the heritage significance of all potentially affected archaeological assets	Non-intrusive and intrusive pre-application evaluation surveys have been undertaken to inform the baseline and the assessment of effects in **Application Document 6.10 Chapter 10 Cultural Heritage**. The results, which are submitted as **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report** and **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report**, have identified known and previously unknown archaeological remains that may be affected by the Project and have informed the scope of archaeological mitigation secured in **Application Document 7.9 Outline Archaeological Written Scheme of Investigation** and **Application Document 7.10 Outline Cultural Heritage Management Plan**
This will ensure there is sufficient information to assess the impacts of the proposals and design appropriate mitigation in accordance with the relevant national and local planning policies (NPS-EN-1; NPPF, para 194; North Lincolnshire Core Strategy CS6, and North Lincolnshire Local Plan HE5, HE8 and HE9, and LC14)	The archaeological evaluation results, which are submitted as **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report** and **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report**, have identified known and previously unknown archaeological remains that may be affected by the Project. The results have informed the assessment of effects in **Application Document 6.10 Chapter 10 Cultural Heritage** and the scope of archaeological mitigation secured in **Application Document 7.9 Outline Archaeological Written Scheme of Investigation** and **Application Document 7.10 Outline Cultural Heritage Management Plan**.

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
All final archaeological evaluation reports should be appended to the ES	The final evaluation reports are submitted as **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report** and **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report.**
A Heritage and Archaeological Management Plan should be submitted with the ES setting out appropriate measures to avoid harm, enhance and conserve the heritage assets and their settings.	An outline cultural heritage management plan setting out appropriate measures for cultural heritage assets, including preservation measures and a procedure for unexpected archaeological discoveries, is submitted as **Application Document 7.10 Outline Cultural Heritage Management Plan**.
Where harm to archaeological remains is unavoidable and justifiable, the Management Plan should outline the location, scope and extent of appropriate programmes of archaeological excavation and recording in advance of and/or during construction	An archaeological mitigation report, which sets out the location, scope and strategy for the recording of heritage assets that may be wholly or partially lost because of the Project, has been agreed with the Archaeological Advisors to the relevant local planning authority and is submitted as **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**
The Heritage and Archaeological Management Plan should be appended to the CEMP with other Management Plans.	An outline cultural heritage management plan setting out appropriate measures for cultural heritage assets, including preservation measures and a procedure for unexpected archaeological discoveries, is submitted as **Application Document 7.10 Outline Cultural Heritage Management Plan**.
HISTORIC ENVIRONMENT RECORD (HER) FUNCTION: To hold, maintain, interpret and manage heritage information, enhancing the understanding of the area's historical development as a distinctive and attractive place. HER information provides source material for interpretation by heritage professionals and for use by community groups and individuals. The HER database is updated as new information about the historic environment is discovered.	The HER is one of many data sources used to establish the cultural heritage baseline conditions and the assessment of effects. Data sources, including the HER, are listed in **Application Document 6.10 Chapter 10 Cultural Heritage**

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
The HER also provides advice on development proposals that affect, or may affect, the sites and settings of all heritage assets i.e. designated and non-designated historic buildings, archaeological sites and monuments, and historic places, areas and landscapes. This advice is provided against saved local plan policies and national historic environment policies. See https://www.northlincs.gov.uk/planning-and-environment/historic-environment-and-conservation/	
Detailed Advice	
Thank you for consulting the HER on this scoping report that includes the Cultural Heritage (Chapter 9). I have previously commented on the draft Cultural Heritage methodology, recommended a number of additional viewpoints for the historic landscape assessment and more recently advised on the route corridor to reduce adverse impacts on the nationally important Isle of Axholme historic landscape	Heritage viewpoints are provided in Application Document **6.10.A3 Appendix 10.3 Cultural Heritage Visualisations**. The location and rationale for heritage viewpoints were discussed and agreed with North Lincolnshire Council during consultation undertaken in February 2026. Within the Isle of Axholme Area of Special Historic Landscape Interest, the overhead line has been close paralleled with the existing overhead line, as much as feasible, to minimise setting change. As reported in section 10.8 of **Application Document 6.10 Chapter 6 Cultural Heritage**, post mitigation, minor adverse effects have been assessed for the Isle of Axholme Area of Historic Landscape during construction and operation of the Project
Given the known and currently unknown archaeological potential along the route of the proposed lines, I have advised that pre-application archaeological field evaluation would be expected to be undertaken to provide the necessary information for an adquate EIA. North Lincolnshire HER provided detailed comments on the draft Cultural Heritage Methodology document in May which remain relevant to the Scoping Report.	Non-intrusive and intrusive pre-application evaluation surveys have been undertaken to inform the baseline and the assessment of effects in **Application Document 6.10 Chapter 10 Cultural Heritage**. The results, which are submitted as **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report** and **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report**, have identified known and previously unknown archaeological remains that may be affected by the Project and have informed the scope of archaeological mitigation secured in **Application Document 7.9 Outline Archaeological Written**

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
	Scheme of Investigation and **Application Document 7.10 Outline Cultural Heritage Management Plan**.
Cultural Heritage Baseline	
Historic Landscape	
The historic landscape heritage asset is affected along the full route within North Lincolnshire. HER spatial data of Miller's character areas has been provided but this is not identified on Figures 9-1 and 9- 2, accompanying the Scoping Report, nor is it listed in the gazetteer of ND heritage assets Appendix 9A.	The assessment of historic landscape character and thematic assessments of characteristics within that are provided in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report**. Likely residual effects resulting from the Project are provided in **6.10 Chapter 6 Cultural Heritage.** Historic landscape character areas, based on spatial data from the HER, are illustrated in **Application Document 6.10.F4 Historic Landscape Character** and **Application Document 6.10.F5 Isle of Axholme Historic Landscape Character Zones**.
The historic landscape is recognised to be nationally significant because it retains the pattern of ancient open strip fields, early enclosures and areas of historic peat cutting or Turbaries. In North Lincolnshire, the area of this unique historic landscape lying to the south of the A18 is locally designated and protected from adverse development under saved Local Plan Policy LC14 'Area of Special Historic Landscape Interest of the Isle of Axholme' (see Appendix 1).	The Isle of Axholme is a non-designated heritage asset but is designated in local planning policy as Isle of Axholme Area of Special Historic Landscape Interest. **Application Document 6.10.F5 Figure 10.5 Isle of Axholme Historic Landscape Character Zones**, illustrates the different levels of heritage sensitivity and value within the Isle of Axholme landscape and this has been considered in the assessment of effects in **Application Document 6.10 Chapter 10 Cultural Heritage**
This current policy is not referenced in the Cultural Heritage chapter of the Scoping Report (Table 9.2).	The policy is referenced in **Application Document 6.10.A1 Appendix 10.1 Regional and Local Planning Policy**.
Policy LC14 is supported by the evidence of a detailed survey of the historic landscape character of the Isle of Axholme (Miller, K.1997 *The Isle of Axholme, Historic Landscape Characterisation Project* Countryside Commission, Leeds; see https://www.northlincs.gov.uk/planning-and-environment/historic-environment-and-conservation/historic-environment-record/historic-landscape-character/	The 1997 survey by Miller has informed the historic landscape baseline assessment submitted in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report**, and the assessment of effects in **6.10 Chapter 6 Cultural Heritage**.

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
The Scoping boundary runs through the most sensitive historic landscape characters types of the Ancient Open Strip Fields (AOSF) and Early Enclosed Land (EEL) for much of the route within the protected policy area. The height and scale of the pylons and overhead lines on the lower-lying land has the potential to affect the historic landscape setting within the best-preserved areas of the ancient open strip fields on the raised ridge of the Isle such as at Belton Fields and Church Field Epworth.	The Isle of Axholme is a non-designated heritage asset but is designated in local planning policy as Isle of Axholme Area of Special Historic Landscape Interest. As illustrated on **Application Document 6.10.F5 Figure 10.5 Isle of Axholme Historic Landscape Character Zones**, the route of the proposed overhead line has avoided the area categorised as Ancient Open Strip Fields, as far as practicable. The largest part of the proposed overhead line within the Isle of Axholme passes through a less sensitive area of Recently Enclosed Land and a small part of Early Enclosed Land, with the Project only passing through the area categorised as Ancient Open Strip Fields between proposed pylons 4AF134 and 4AF136 in the north, and at proposed pylon 4AF156 in the south. **Application Document 6.10 Chapter 10 Cultural Heritage** assesses there would be a temporary minor adverse effect to the Isle of Axholme during construction, and a permanent minor adverse effect during operation
The council has recently advised that routing the proposed electricity lines through the Recent Enclosed Land character area, of less sensitivity that the AOSF and EEL character, would reduce the harm, or to underground the cables through the area.	As illustrated on **Application Document 6.10.F5 Figure 10.5 Isle of Axholme Historic Landscape Character Zones**, the route of the proposed overhead line has avoided the area categorised as Ancient Open Strip Fields, as far as practicable. The largest part of the proposed overhead line within the Isle of Axholme passes through a less sensitive area of Recently Enclosed Land and a small part of Early Enclosed Land, with the Project only passing through the area categorised as Ancient Open Strip Fields between proposed pylons 4AF134 and 4AF136 in the north, and at proposed pylon 4AF156 in the south
The historic landscape of the Isle of Axholme is a heritage asset of national importance and should be included with higher graded assets and a study area applied of 3km from the Scoping Boundary (9.3.2)	The Isle of Axholme is a non-designated heritage asset but is designated in local planning policy as Isle of Axholme Area of Special Historic Landscape Interest. **Application Document 6.10.F5 Figure**

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
	10.5 Isle of Axholme Historic Landscape Character Zones, illustrates the different levels of heritage sensitivity and value within the Isle of Axholme landscape and this has been considered in the assessment of effects in **Application Document 6.10 Chapter 10 Cultural Heritage** which assesses there would be a temporary minor adverse effect to the Isle of Axholme during construction, and a permanent minor adverse effect during operation
EIA should therefore assess the impacts on the character, appearance and setting of the historic landscape heritage asset as described in the Miller report, including the effects of any proposed mitigation for other EIA topics such as landscaping proposals which may not be appropriate in the historic landscape. For example, in the relatively open landscape of the Isle of Axholme, trees planting can dramatically alter the landscape character.	**Application Document 6.10 Chapter 10 Cultural Heritage** which assesses there would be a temporary minor adverse effect to the Isle of Axholme during construction, and a permanent minor adverse effect during operation. Landscape planting is not proposed within the Isle of Axholme landscape
The methodology for the historic landscape impact assessment should be based on Historic England's Historic Environment Good Practice Advice Note 3 ('*The Setting of Heritage Assets*' 2nd Edition, 2017) https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/.	Historic England's Historic Environment Good Practice Advice Note 3 has informed the methodology of the impact assessment and is listed as guidance in **Application Document 6.10 Chapter 10 Cultural Heritage**
The effects on the character and setting of the historic landscape should be assessed in the Cultural Heritage Chapter of the ES from viewpoints previously advised to include but not necessarily limited to the following: • South of West Butterwick across the Riverside AOSF historic landscape character at public footpath; NGR SE 48330 40525 or SE 48358 40416 • Within Melwood Priory Scheduled Monument NGR SE 48066 40185	The alignment of the proposed overhead line has changed since Scoping. Heritage viewpoints have been agreed with the heritage officers to the relevant local planning authority and with Historic England. Viewpoints are submitted as **Application Document 6.10.A3 Appendix 10.3 Cultural Heritage Visualisations**.

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
• From public footpaths looking SE across Epworth AOSF historic landscape character NGR SE 47916 40415 • From high point along public footpath overlooking Epworth AOSF historic landscape character NGR SE 47786 40702 • From public footpath network at high point on Belton Field AOSF historic landscape character NGR SE 47786 40702 • Proposed Viewpoint 50 Beltoft, consider moving a short distance to the west to encompass the AOSF historic landscape character either side of road travelling toward Beltoft village, or an additional viewpoint for the cultural heritage assessment NGR SE 48035 40686 • Proposed Viewpoint 63 Burton upon Stather, consider moving to public footpath adjacent to St Andrews Church Tower (Listed Grade I) NGR SE 48699 41787	
Archaeology	
The archaeological baseline included in the Scoping report (9.4.15-9.4.28) for heritage assets in North Lincolnshire is based on the known resource recorded on the HER and indicates the potential for the development areas to contain further unrecorded archaeological remains the significance of which is currently unknown, but could be high.	National Grid notes this feedback
The majority of archaeological heritage assets recorded in North Lincolnshire are below-ground archaeological remains on agricultural land rather than upstanding earthworks and as such do not lend themselves to easy identification by field observation or walkover survey. They are generally identified from the air or through archaeological prospection techniques such as systematic fieldwalking, metal detecting, geoarchaeological and geophysical surveys and archaeological excavation. There are also areas along	National Grid notes this feedback. The results of fieldwork surveys carried out for the Project have allowed for previously unknown heritage assets to be identified, informing the heritage assessment and the design process. The results of the archaeological surveys are presented in **Application Document 6.10.A5 Appendix 10.5 Aerial Photography and LiDAR Report; Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report; Application Document 6.10.A7**

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
the route of former wetland areas with potential for archaeological and palaeo environmental preservation in peat and waterlogged deposits that may masked and not easy to detect by these techniques. The area around Keadby has been previously investigated for wind farm and power station developments but there are considerable areas of the route that have not been subject to any previous archaeological investigation.	**Appendix 10.7 Geoarchaeological Desk-based Assessment,** and **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report**.
Accordingly, it is considered that there is high potential for unrecorded archaeological heritage assets to be present throughout the route of the proposed electric lines through North Lincolnshire and that archaeological field evaluations will be required to identify currently unknown archaeological heritage assets in accordance with relevant national and local planning policy including NPS EN-1, section 5.8.8- 10, paragraph 194 of the NPPF, North Lincolnshire Core Strategy CS6 and saved Local Plan policies HE8 and HE9 (see Appendix 1 below).	National Grid notes this feedback. The results of fieldwork surveys carried out for the Project have allowed for previously unknown heritage assets to be identified, informing the heritage assessment and the design process. The results of the archaeological surveys are presented in **Application Document 6.10.A5 Appendix 10.5 Aerial Photography and LiDAR Report; Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report; Application Document 6.10.A7 Appendix 10.7 Geoarchaeological Desk-based Assessment,** and **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report**
Scoping Report	
Scoping Report Table 9.2: Relevant Local Planning Policies should include current North Lincolnshire Local Plan policies relevant to cultural heritage issues as well as the draft New Local Plan policies (cf. Bassetlaw). The current saved Local Plan policies include LC14 Area of Special Historic Landscape Interest of the Isle of Axholme (ASHLI) HE5 Development and Listed Buildings HE8 Ancient Monuments HE9 Archaeological Evaluation	Relevant policies are referenced in **Application Document 6.10.A1 Appendix 10.1 Regional and Local Planning Policy**.

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
Table 9.3 Engagement with local authorities The response to our advice on additional viewpoints for assessment of effects on the Isle of Axholme historic landscape does not confirm that the Cultural Heritage assessment will consider these views. The response to our advice that desk-based assessment without the results of archaeological field evaluation would be inadequate is not sufficiently clear that the applicant intends to undertake a staged and systematic field evaluation along the route to inform the ES. We reiterate our advice that archaeological field evaluation is necessary in North Lincolnshire to inform the ES and application. A staged programme of fieldwork along the route needs to be undertaken at the earliest stage. We note that we do not consider evaluation to be mitigation. Evaluation is necessary to identify and assess significance to be taken into account in the ES and decision making process.	Viewpoints are submitted as **Application Document 6.10.A3 Appendix 10.3 Cultural Heritage Visualisations**. **Application Document 6.10 Chapter 10 Cultural Heritage** is supported by a cultural heritage desk-based assessment, presented in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report**, and the results of archaeological field evaluation. The results of the field evaluation surveys are submitted as **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report** and **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report**.
As noted above, the historic landscape heritage asset is affected along the full route within North Lincolnshire. HER spatial data of Miller's character areas has been provided but this is not identified on Figures 9-1 and 9-2, accompanying the Scoping Report, nor is it listed in the gazetteer of ND heritage assets Appendix 9A.	Historic landscape character areas, based on spatial data from the HER, are illustrated in **Application Document 6.10.F4 Historic Landscape Character** and **Application Document 6.10.F5 Isle of Axholme Historic Landscape Character Zones**.
With regard to future access for archaeological investigations beneath OHL being dependent on access rights under a DCO, we would reiterate our preliminary advice that where such considerations would prevent future archaeological investigation, such investigations must be conducted for this development,	The Applicant confirms that the installation and presence of the proposed overhead line will not preclude access to the ground beneath the proposed overhead line during the Project's operational phase, should this be required, for future archaeological investigation.
Study Area 9.3.2 The Isle of Axholme Historic Landscape heritage asset is of national importance and should be included with the higher graded assets and the study area of 3km from the Scoping boundary.	The Isle of Axholme is a non-designated heritage asset but is designated in local planning policy as Isle of Axholme Area of Special Historic Landscape Interest. **Application Document 6.10.F5 Figure 10.5 Isle of Axholme Historic Landscape Character Zones**, illustrates the different levels of heritage sensitivity and value within the Isle of Axholme landscape.

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
Baseline Conditions 9.4.2 Consistent with our previous advice that desk based Data Sources are inadequate to establish the baseline for the EIA, the results of archaeological field evaluation are required in North Lincolnshire to inform the baseline and future baseline environment, to identify heritage assets that may be affected and assess their significance.	Non-intrusive and intrusive pre-application evaluation surveys have been undertaken to inform the baseline and the assessment of effects in **Application Document 6.10 Chapter 10 Cultural Heritage**. The results are submitted as **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report** and **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report.**
9.4.3 The Isle of Axholme Historic Landscape heritage asset is not included on the figures. The individual character areas (Miller, 1997) should to be shown on the figure 9-1; HER spatial data has been provided.	Historic landscape character areas, based on spatial data from the HER, are illustrated in **Application Document 6.10.F4 Historic Landscape Character** and **Application Document 6.10.F5 Isle of Axholme Historic Landscape Character Zones**.
9.4.28 Policies for the Isle of Axholme Historic Landscape heritage asset should refer to the current saved Local Plan Policy LC14 from 2003 onwards, this is a long-established policy of North Lincolnshire council.	Relevant policy is included in **Application Document 6.10.A1 Appendix 10.1 Regional and Local Planning Policy**.
9.5.1 Embedded Measures. This will require field evaluation to identify and assess known and currently unknown archaeological heritage assets.	Field evaluation surveys have been carried out for the Project. Results are submitted as **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report** and **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report.**
9.5.2 North Lincolnshire council has provided detailed advice on the route corridors and graduated swathe to minimise adverse harm to the ASHLI.	Within the Isle of Axholme Area of Special Historic Landscape Interest, the overhead line has been close paralleled with the existing overhead line, as far as practicable, to reduce the spread of infrastructure in views and minimise setting change.
9.5.4 Control Measures: GG03 The suite of Management Plans should include a Cultural Heritage and Archaeology Management Plan setting out the proposed mitigation measures	Field evaluation surveys have been carried out for the Project. Results are submitted as **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report** and **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report.**

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
H02 We consider that the discovery of a previously unknown heritage asset after effective evaluation should only ever be a residual risk on a construction project of this scale. Archaeological field evaluation undertaken to inform the EIA should have identified the extent of known sites and any currently unknown archaeological heritage assets to allow the preparation and undertaking of the appropriate mitigation techniques in a timely fashion prior to/during construction works to avoid any unnecessary delay to the project timetable.	A procedure for managing unexpected archaeological discoveries is included in **Application Document 7.10 Outline Cultural Heritage Management Plan**.
9.6.5 Sources of operational impacts. We consider that the viability of heritage assets, ie the preservation of their significance, includes the ability of future generations (within the next few decades) to study the archaeological interest.	National Grid notes this feedback.
9.6.7 As noted, the ASHLI heritage asset and historic landscape character areas are not included on these figures or the appendix.	Historic landscape character areas, based on spatial data from the HER, are illustrated in **Application Document 6.10.F4 Historic Landscape Character** and **Application Document 6.10.F5 Isle of Axholme Historic Landscape Character Zones**.
Table 9.4 Impacts and the potential for significant effect. Impacts to the access of heritage assets during Operation could result in significant effects where archaeological techniques such as geophysical suveys are affected by increased magnetic fields and use of machines for archaeological investigation beneath and adjacent to the lines is prevented. Where the new line runs in parallel with the existing this may effectively sterilize a considerable swathe for future archaeological investigation.	Geophysical survey has been undertaken for the Project. The results are submitted as **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report**. The Applicant confirms that the installation and presence of the proposed overhead line will not preclude access to the ground beneath the proposed overhead line during the Project's operational phase, should this be required, for future archaeological investigation.
Maintenance of the existing overhead lines has shown that there can be additional physical impacts on archaeological heritage assets, for example the requirement for new access tracks and working platforms. This could be potentially be a significant effect requiring mitigation for maintenance to be considered in the Archaeological Management Plan.	**Application Document 7.10 Outline Cultural Heritage Management Plan** includes management measures for cultural heritage matters during maintenance activities.

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
Impact Pathways with Receptors (Step 2) sic 9.6.10 We note that to identify any significant impacts on archaeological heritage assets, known and currently unknown, will require the results of archaeological field evaluation.	Field evaluation has been undertaken for the Project. Results are submitted as **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report** and **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report.**
Table 9.5 Impact pathways with receptors Construction Temporary impacts to a heritage assets as a result of changes to their setting. The historic landscape is a heritage asset to be considered as other designated and non-designated heritage assets and should be Scoped In.	Temporary changes to heritage assets through setting change and impacts to the historic landscape are included in the assessment in **Application Document 6.10 Chapter 10 Cultural Heritage**.
Operation Impacts to heritage assets as a result of changes to their setting, should also include loss of access for future investigation of archaeological heritage assets.	Operational effects to heritage assets considers the loss of access where relevant.
Proposed Assessment Methodology	
Study Area 9.7.2 – 9.73 As previously advised, 1km is considered acceptable for non-designated heritage assets and archaeology, but the ASHLI should be considered as a higher graded asset due to its national importance and a 3km distance employed for the assessment. 9.7.4 It would have been useful for a ZTV to be included in the Scoping Report so that the study areas could be confirmed at Scoping, given that it is unclear who will decide the extended areas for heritage assets. In particular the ASHLI heritage asset has a greater influence over the wider landscape. Clearly, any further scoping will need to be agreed with the local authority.	The study areas for cultural heritage are presented in **Application Document 6.10.F1 Designated Heritage Assets within Study Areas**; and **Application Document 6.10.F2 Non-designated Heritage Assets within 1 km Study Area**. The cultural heritage assessment in **Application Document 6.10 Chapter 10 Cultural Heritage** sets out and provides justification for the three different study areas that, together, ensure that the assessment identifies and assesses all likely significant cultural heritage effects. A summary is provided below. A 1 km study area from the Order Limits has been used to collect data on non-designated archaeological assets, comprising buried and above-ground archaeological remains, plus information on archaeological investigations, including desk-based assessments and fieldwork surveys. These contextual data contributed to the understanding of archaeological baseline conditions reported in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage**

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
	Baseline Report. The data captured within the 1 km study area from the Order Limits is considered sufficient to identify known archaeological remains within, or in proximity to, the Order Limits and to inform the likelihood of encountering previously unknown archaeological remains. As such, it is appropriate for assessing likely significant effects to buried archaeological remains. A 1 km study area from the lateral Limits of Deviation (LoD) of the proposed overhead line has been used to assess likely significant effects to designated and non-designated heritage assets as a result of changes to their setting. This study area, which is measured from the LoD for the proposed overhead line rather than the Order Limits, recognises that potential significant effects from setting change are more likely to arise from the operational presence of the Project's permanent infrastructure, comprising the proposed pylons and overhead line. Measuring from the LoD for the proposed overhead line ensures that a worst-case level of change to setting is assessed. Significant effects from setting change to heritage assets beyond the 1 km study area from the LoD of the proposed overhead line are less likely due to the distance involved. However, for heritage assets of the highest sensitivity and value (i.e., World Heritage Sites, Grade I and II* listed buildings, Registered Battlefields, Grade I and II* Registered Parks and Gardens (RPG), scheduled monuments, and conservation areas containing a notable concentration of highly designated assets), there is a greater potential for change owing to their greater sensitivity and as their setting can extend over a larger area. In recognition of this, a wider study area of 3 km from the lateral LoD of the proposed overhead line is used to assess likely significant effects to heritage assets of the highest value.
Proposed Data Sources 9.7.5 – 9.7.6 In North Lincolnshire the proposed data sources will need to include the results of archaeological field evaluation.	The results of archaeological field evaluation surveys have been included in **Application Document 6.10 Chapter 10 Cultural Heritage**

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
Technical Guidance 9.7.7 This list should include the CIfA Standard and Guidance for Evaluation, the EAC geophysical survey guidelines and relevant Historic England professional guidelines for archaeological fieldwork.	Archaeological evaluation and geophysical survey was undertaken in line with a specification agreed with the Archaeological Advisors to the relevant local planning authority, and guidance published by the Chartered Institute for Archaeologists.
EIA ASSESSMENT– SCOPING ADVICE	
The Scoping Report (Table 9.3) states that 'desk-based assessment will be carried out and the results of this will be included in the ES. The scope of any archaeological evaluation fieldwork will be discussed with the Council as the Project progresses and, if required, the results will be included in the ES.'	**Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report** has been informed by the results of archaeological field evaluation. The results of the field evaluation surveys have been included in **Application Document 6.10 Chapter 10 Cultural Heritage** and are submitted as **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report** and **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report**
For clarity, we consider that the EIA heritage baseline and assessment must be informed by the results of pre-application archaeological field evaluation This is to identify and assess the significance of the known and currently unknown archaeological remains across the development area and to ensure there is sufficient information to assess the impacts of construction and operation, and to design and prepare the Archaeological Management Plan for mitigation strategies that may include avoidance measures and/or the development of outline programmes of work for archaeological excavations and recording. This will inform the decision-making process in accordance with all the relevant and current national and local planning policies.	
The heritage assessment should consider the interrelationships and impacts between heritage/archaeology/historic landscape and the other topics covered in the EIA such as Ground Conditions, Hydrology, LVIA and Landscaping Plan	The assessment of effects to heritage assets includes inter-relationships with other environmental disciplines, where appropriate and relevant to assessment. These aspects are considered in the impact assessment presented in **Application Document 6.10 Chapter 10 Cultural Heritage**

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
The archaeological heritage assessment should comprise ALL the following iterative stages:	This comment is noted and individual responses are provided against each stage below
Desk Based Research	
• Collation and synthesis of existing historic environment data sources relating to **all** heritage assets that the proposed development may affect directly or indirectly. The spatial scope for the proposed development should be a minimum 3km for designated heritage assets and the Isle of Axholme historic landscape, and 1km for non-designated heritage assets and should provide the context for the subsequent archaeological fieldwork, including appropriate research objectives.	Detailed in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report**.
• Data gathering should include but not be limited to the following available sources: the North Lincolnshire Historic Environment Record and other relevant national and local heritage databases; Portable Antiquities Scheme database; local archives; historic maps and plans; aerial photographs, drone survey and LIDAR data including transcription of all identified features; geo-technical and geo-archaeological data to produce a preliminary deposit model; and other published and unpublished documents	Detailed in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report**.
• Walkover to identify the presence of any above or below ground archaeological remains or historic landscape features within the application area and/or any constraints on the following stages of archaeological fieldwork	Detailed in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report**.
Pre-Application Archaeological Field Evaluation	
• Systematic fieldwalking and metal detection for surface collection of archaeological artefacts, to identify the range and distribution of all materials and plot potential archaeological features	Not applicable to assessment. Fieldwork scope has been agreed with the Archaeological Advisor to the local planning authority.

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
• Measured survey of upstanding earthwork remains to assess survival, condition and potential for reinstatement following construction	Not applicable to assessment. Fieldwork scope has been agreed with the Archaeological Advisor to the local planning authority.
• Geophysical survey of the proposed site to identify and plot anomalies of potential archaeological origin using magnetometry, resistivity or other appropriate techniques;	Results are submitted as **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report.**
• Excavation of sample trial trenches to determine the nature, extent, state of preservation and importance of any archaeological remains within the proposed development area informed by the results of preceding stages of research and survey	Results are submitted as **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report.**
• Archaeological monitoring and recording opportunities during geo-technical investigations.	Geoarchaeological monitoring of geotechnical investigations is being carried out for the Project. The results will be submitted during Examination.
• Specifications for each stage should be agreed with the HER prior to commencement, to accord with the HER brief for evaluation, and with the relevant Chartered Institute for Archaeologists published Standards and Guidance (http://www.archaeologists.net/) and Historic England professional guidelines (https://www.historicengland.org.uk/images-books/publications)	All fieldwork was undertaken in line with a written scheme of investigation agreed with the Archaeological Advisor to the local planning authority.
• All stages of archaeological field evaluation should be carried out by a suitably experienced archaeological contractor, such as a Registered Organisation accredited by the Chartered Institute for Archaeology (see http://www.archaeologists.net/) or an organisation that can demonstrate that they have equivalent experience, capability and quality management systems in place. The appointed contractor must have access to appropriate geo-archaeological expertise.	All fieldwork was undertaken by a Registered Organisation and in line with a written scheme of investigation agreed with the Archaeological Advisor to the local planning authority.

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
• All fieldwork should be undertaken in accordance with CIFA's published Standards and Guidance for evaluation, and Historic England professional guidelines https://www.historicengland.org.uk/images-books/publications) to written specifications that have been agreed with the HER prior to commencement.	All fieldwork was undertaken by a Registered Organisation and in line with guidance published by the Chartered Institute for Archaeologists. This was detailed in the written scheme of investigation for the fieldwork, agreed with the Archaeological Advisor to the local planning authority.
Assessment of Significance	
• Assessment of the significance of those heritage assets and their settings likely to be directly or indirectly impacted by the development; the assessment of the significance of heritage assets will take account of the combined results of all the preceding stages of desk based assessment and archaeological field evaluation, and be based on the heritage values set out in *Conservation Principles, Policies and Guidance for the sustainable management of the historic environment*, Historic England, 2008 https://www.historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/.	The assessment of significance and the contribution of setting to significance is presented in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report** which takes account of the results of field evaluation. This assessment uses Historic England Advice Note 12 Statements of Heritage Significance: Analysing Significance in Heritage Assets (2019) rather than the older Historic England guidance on Conservation Principles, Policies and Guidance for the sustainable management of the historic environment (2008) as this updated guidance is better aligned to the terminology used in the NPS and NPPF for assessing heritage significance.
• The methodology of assessing the contribution of setting to signicance should be undertaken as set out in Historic England's Historic Environment Good Practice Advice Note 3 ('The Setting of Heritage Assets' 2nd Edition, 2017) https://historicengland.org.uk/images- books/publications/gpa3-setting-of-heritage-assets/.	The assessment of significance and the contribution of setting to significance is presented in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report.** The methodology used follows Historic England's Historic Environment Good Practice Advice Note 3 ('The Setting of Heritage Assets' 2nd Edition, 2017)
• The use of photographic visualisations from appropriate viewpoints along the pipeline corridors would be of particular use to demonstrate indirect effects of the proposals on settings, including evidence of no effects. Impacts other than visual, such as noise, dust and odour, should also be considered. Viewpoints should be agreed with the HER and planning case officers.	Heritage viewpoints have been agreed with the heritage officers to the relevant local planning authority and with Historic England. Viewpoints are submitted as **Application Document 6.10.A3 Appendix 10.3 Cultural Heritage Visualisations**.

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
4. Assessment of Impact	
• Assessment of impacts of the proposed development on the significance of the heritage assets and their settings based on the findings of the preceding stages, with reference to details of proposed construction ground works in relation to archaeological assets, and justification of impacts explaining why the works would be necessary or desirable, including any benefits or heritage enhancements which justify any resulting harm. In the case of substantial harm or loss of significance, the relevant tests in the NPPF should be applied.	Detailed in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report** and **Application Document 6.10 Chapter 10 Cultural Heritage**. A Heritage Statement of Harm is presented in **Application Document 5.5 Planning Statement** where the tests of the NPPF and NPS are applied.
• Consideration must also be given for future accessibility to conduct archaeological investigations to ensure the archaeological interest is maintained and available for future generations to investigate.	As stated in **Application Document 6.10 Chapter 10 Cultural Heritage**, the Applicant confirms that the installation and presence of the proposed overhead line will not preclude access to the ground beneath the proposed overhead line during the Project's operational phase, should this be required, for future archaeological investigation.
5. Mitigation	
• An explanation of any measures taken to avoid, minimise or mitigate any harm to the significance of the heritage asset/s, including within their settings.	Detailed in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report** and **Application Document 6.10 Chapter 10 Cultural Heritage**.
• Where harm is unavoidable, measures to offset the harm to significance should be included	Where feasible and as reported in **Application Document 6.10 Chapter 10 Cultural Heritage**, changes have been made to the alignment of the overhead line to minimise setting change and impacts to heritage assets. Unavoidable impacts will be mitigated by a programme of archaeological investigation, detailed in **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**.

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
• Measures to enhance heritage assets and engender community participation and appreciation	**Application Document 7.9 Outline Archaeological Written Scheme of Investigation** includes a strategy for community outreach and engagement.
Assessing the value of heritage asset and the magnitude of change (see 9.7, Scoping Report) should take place on completion of **ALL** stages of the field evaluation set out above. The Cultural Heritage chapter of the EIA should be completed and the Environmental Statement should include the results of all historic environment and archaeological fieldwork reports.	**Application Document 6.10 Chapter 10 Cultural Heritage** includes an impact assessment of heritage assets identified from the results of field evaluations carried out for the Project.
The Environmental Statement should consider what the impact of the development on the significance of the heritage assets will be together with a statement of justification of why the works would be desirable or necessary, including any benefits which justify any resulting harm. In the case of substantial harm or loss of significance, the tests in the NPPF should be applied.	Detailed in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report** and **Application Document 6.10 Chapter 10 Cultural Heritage**. A Heritage Statement of Harm is presented in **Application Document 5.5 Planning Statement** where the tests of the NPPF and NPS are applied.
If the assessment demonstrates that the significance of heritage assets will be adversely affected by the proposals, then appropriate mitigation measures should be drawn up to conserve them. This may include avoiding or minimizing effects to areas of significance, if necessary by modifying the layout and/or design of the proposals i.e.. In situ preservation.	Embedded measures to minimise effects on heritage assets are presented in **Application Document 7.3 Register of Environmental Actions and Commitments** and described in **Application Document 6.10 Chapter 10 Cultural Heritage**. Measures to secure preservation in situ of archaeological remains are detailed in **Application Document 7.10 Outline Cultural Heritage Management Plan**.
Alternatively, where harm is unavoidable and loss of heritage assets as a result of development is considered justified, provision should be made to record the evidence before it is lost either in advance of, or during, development.	Where impacts are unavoidable, a programme of archaeological recording, detailed in **Application Document 7.9 Outline Archaeological Written Scheme of Investigation.**
Mitigation measures should be included in the ES and set out in a Heritage and Archaeological Management Plan. The Plan should describe any archaeological exclusion zones with details of how these	Mitigation measures relating to archaeological investigation in advance of construction activities are detailed in **Application**

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
would be implemented and maintained, and any other construction methods to avoid harm to heritage assets. The strategy should outline the scope and extent of appropriate programmes of further archaeological excavation and recording where harm to archaeological remains is unavoidable. These programmes would be detailed in subsequent Written Schemes of Investigation to be prepared by archaeological contractors implementing the works.	**Document 7.9 Outline Archaeological Written Scheme of Investigation.** Measures to secure preservation in situ of archaeological remains are detailed in **Application Document 7.10 Outline Cultural Heritage Management Plan**.
Where a DCO may subsequently be granted, the implementation of an agreed Management Plan can be secured by an appropriately worded Requirement.	National Grid notes this feedback.
Recommendation	
A DCO application submitted for this pipeline proposal would need to be accompanied by an adequate Cultural Heritage assessment as set out above to inform the EIA and accord with paragraph 194 of the NPPF, Core Strategy CS6 and saved Local Plan policies HE5, HE8 and HE9.	Detailed in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report** and **Application Document 6.10 Chapter 10 Cultural Heritage**.
Where the heritage assessment in the EIA is considered to be incomplete or inadequate, the HER will advise the local planning authority for the Local Impact Report.	National Grid notes this feedback.
Appendix 1	
Relevant Policy	
The information required in the Applicant's Assessment is set out in Sections 5.8.8-10 of the National Policy Statement for Energy (EN-1, 2011) as follows:	National Grid notes this feedback.
5.8.8 As part of the ES (see Section 4.2) the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that	National Grid notes this feedback.

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
significance. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset. As a minimum the applicant should have consulted the relevant Historic Environment Record120 (or, where the development is in English or Welsh waters, English Heritage or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact.	
5.8.9 Where a development site includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk- based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, representative visualisations may be necessary to explain the impact.	National Grid notes this feedback.
5.8.10 The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents.	National Grid notes this feedback.
The National Planning Policy Framework (NPPF, 2021) provides guidance to local authorities for conserving and enhancing heritage assets and their settings, which includes archaeological sites and remains. Paragraph 8 refers to the role of the planning system to contribute to achieving sustainable development under three overarching objectives; economic, social and environmental. The environmental objective includes contributing to protecting and enhancing the historic environment.	National Grid notes this feedback.
Section 16 (paragraphs 189-208) of the NPPF details the government's approach to conserving and enhancing the historic environment. Paragraph 189 describes heritage assets as '**an**	National Grid notes this feedback.

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
irreplaceable resource' to be '**conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations**'.	
Paragraph 194 requires an applicant to submit information that identifies any heritage asset that their proposals may affect, and that assesses the significance of the assets including the contribution of their settings. Consultation of the local HER is the minimum requirement in this process. Paragraph 194 states that 'Where a site on which development is proposed includes, or has the potential to include, heritage assets of archaeological interest, local planning authorities should require developers to submit an appropriate desk based assessment and, where necessary, a field evaluation.'	Detailed in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report** and **Application Document 6.10 Chapter 10 Cultural Heritage**.
This information should be sufficient to understand the potential impact of the proposal on the significance of any affected heritage assets. It should also allow the local planning authority to assess the degree of impact on the heritage assets and their settings, and how this impact may be mitigated, by avoiding or minimising any conflict between conserving the asset and any aspect of the proposal (NPPF 195).	Detailed in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report** and **Application Document 6.10 Chapter 10 Cultural Heritage**.
Such assessment allows the planning authority to make an informed and reasonable decision in line with the sustainable development principles of the NPPF, as well as local planning Plan policies HE8 Ancient Monuments and HE9 Archaeological Evaluation.	**Application Document 6.10.A1 Appendix 10.1 Regional and Local Planning Policy** sets out where this is covered in the application.
Core Strategy policy CS6 states that 'The council will seek to protect, conserve and enhance North Lincolnshire's historic environment as well as the character and setting of area of acknowledged importance including historic buildings, conservation areas, listed buildings (both statutory and locally listed), registered parks and gardens, scheduled ancient monuments and archaeological remains…Development proposals should provide archaeological assessments where appropriate.'.	National Grid notes this feedback

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
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.'	**Application Document 6.10.A1 Appendix 10.1 Regional and Local Planning Policy** sets out where this is covered in the application.
Where Scheduled Monuments, or sites of equivalent significance, are affected directly or indirectly, Local Plan policy HE8 directs 'Development proposals which would result in an adverse effect on Scheduled [Ancient] Monuments and other nationally important monuments, or their settings, will not be permitted.'	**Application Document 6.10.A1 Appendix 10.1 Regional and Local Planning Policy** sets out where this is covered in the application.
HE9 Archaeological Evaluation states that 'Where development proposals affect sites of known or suspected archaeological importance, an archaeological assessment to be submitted prior to the determination of a planning application will be required. Planning permission will not be granted without adequate assessment of the nature, extent and significance of the remains present and the degree to which the proposed development is likely to affect them.	**Application Document 6.10.A1 Appendix 10.1 Regional and Local Planning Policy** sets out where this is covered in the application.

North Lincolnshire Council Scoping Response to North Humber to High Marnham Comment	National Grid Response
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.'	**Application Document 6.10.A1 Appendix 10.1 Regional and Local Planning Policy** sets out where this is covered in the application.
Local Plan Policy LC14 will apply which states: 'The Isle of Axholme is designated as an area of Special Historic Landscape Interest. Within this area, development will not be permitted which would destroy, damage or adversely affect the character, appearance or setting of the historic landscape, or any of its features. Development required to meet the social and economic needs of rural communities and small scale tourist and outdoor sport and recreational development will be permitted provided such development is related to the historic landscape and its features. A high standard of design and siting in new development will be required reflecting the traditional character of buildings in the area and the character of the historic landscape, and using materials sympathetic to the locality. Schemes to improve, restore or manage the historic landscape will be sought in connection with, and commensurate with the scale of, any new development affecting the area of Special Historic Landscape Interest.'	**Application Document 6.10.A1 Appendix 10.1 Regional and Local Planning Policy** sets out where this is covered in the application.

1.19 North Lincolnshire Council Scoping Response to Planning Inspectorate

Table 1.18 – North Lincolnshire Council Scoping Response to Planning Inspectorate

North Lincolnshire Council to Planning Inspectorate Comment	National Grid Response
Thank you for your letter dated 21 August 2023 seeking a view from North Lincolnshire Council in respect of the information to be provided in an Environmental Statement to be produced in support of a Development Consent Order application by National Grid Electricity Transmission for the North Humber to High Marnham project	National Grid notes this feedback.
Having considered the submitted scoping report North Lincolnshire Council would like to make the following comments regarding the information that should be included within the Environmental Statement:	National Grid notes this feedback.
Air Quality	
The Scoping Report confirms that an air quality assessment will be submitted with the future application which includes: • Construction fugitive dust emissions • Construction vehicle emissions (should screening of construction traffic flows show vehicle trips exceed EPUK/IAQM Guidance)	National Grid notes this feedback.
Operational phase air quality impacts have been screened out of further assessment.	National Grid notes this feedback.
The Local Planning Authority is content with this conclusion.	National Grid notes this feedback.
Contaminated Land	
The proposed route, at some locations, is in close proximity to former landfill sites and other potentially contaminative land uses as identified in Figure 11-4.	National Grid notes this feedback.

North Lincolnshire Council to Planning Inspectorate Comment	National Grid Response
The councils contaminated land planning guidance document detailed below and produced in collaboration with other local authority Yorkshire and Lincolnshire Pollution Advisory Group (YALPAG) members is available on the councils web site at the following link: http://www.northlincs.gov.uk/planning-and-environment/environmental- health/pollution-air-land-and-water/contaminated-land/	National Grid notes this feedback.
It recommends that where a proposed development introduces a vulnerable end use and/or the development site could be affected by a former potentially contaminative land use, the possibility of land contamination should always be considered. In these circumstances a **Phase 1** assessment should be submitted as a minimum, which includes a desk top study, a site walkover and a conceptual site model.	**Application Document 6.12 Environmental Statement Chapter 12 Geology and Hydrogeology** is supported by **Application Document 6.12.A2 Appendix 12.2 Preliminary Contamination Risk Assessment** undertaken following a staged approach as recommended by the guidance provided in Land Contamination Risk Management (LCRM) (Environment Agency, 2025).
Only a site specific investigation can establish whether there is contamination at a particular site, however a desk study and site walkover may be sufficient to identify how pollutant linkages might be broken. Unless this initial assessment clearly demonstrates that the risk from contamination can be satisfactorily reduced to an acceptable level, further site investigations and risk assessment will be needed before the application can be determined. After remediation, as a minimum land should not be capable of being determined as contaminated land under Part 2Aof the Environmental Protection Act 1990.	**Application Document 6.12 Environmental Statement Chapter 12 Geology and Hydrogeology** is supported by **Application Document 6.12.A2 Appendix 12.2 Preliminary Contamination Risk Assessment** undertaken following a staged approach as recommended by the guidance provided in Land Contamination Risk Management (LCRM) (Environment Agency, 2025). The control and management measures that will be implemented to limit effects related to the Project, are described in **Application Document 7.3 Register of Environmental Actions and Commitments** – including those specific to geology and hydrogeology**.** These include GH01 that secures the requirement for intrusive ground investigations and assessment to be undertaken prior to construction, including geoenvironmental sampling, testing and assessment. GH02, that secures the requirement for further assessment and investigation of sites that are identified as presenting a moderate and above risk of contamination being present, with the nature and scope of any mitigation or remediation to be agreed with the Environment Agency and Local Planning Authority as appropriate.

North Lincolnshire Council to Planning Inspectorate Comment	National Grid Response
The LPA therefore request the submission of a Phase 1 report in support of the application. This will demonstrate whether further assessment of the site is required.	**Application Document 6.12 Environmental Statement Chapter 12 Geology and Hydrogeology** is supported by **Application Document 6.12.A2 Appendix 12.2 Preliminary Contamination Risk Assessment** undertaken following a staged approach as recommended by the guidance provided in Land Contamination Risk Management (LCRM) (Environment Agency, 2025).
Cultural Heritage	
Having reviewed Chapter 9 of the Scoping Report the local planning authority has concerns with the proposed approach to the assessment of cultural heritage. A summary of these concerns is provided below and they are outlined fully in the appended response from the councils Historic Environment Record dated 15/09/2023:	National Grid notes this feedback.
The proposed electricity lines have the potential for indirect impacts on designated and non-designated heritage assets and their settings within North Lincolnshire including the key heritage asset of the Isle of Axholme historic landscape.	National Grid notes this feedback
The proposed route south of the A18 falls within the Isle of Axholme Area of Special Historic Landscape Interest (ASHLI) protected from adverse development under saved Local Plan Policy LC14 (North Lincs Local Plan 2003).	National Grid notes this feedback
There is also potential for direct, physical impacts on known and currently unrecorded non-designated archaeological heritage assets throughout the route including potential for well-preserved palaeoenvironmental evidence. The proposed methodology in the Scoping Report is considered to be inadequate as it comprises desk-based assessment without archaeological field evaluation.	**Application Document 6.10 Chapter 10 Cultural Heritage** is supported by a cultural heritage desk-based assessment, presented in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report**, and the results of archaeological field evaluation. The results of the field evaluation surveys are submitted as **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report** and **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report**.

North Lincolnshire Council to Planning Inspectorate Comment	National Grid Response
Pre-application archaeological evaluation will be necessary in North Lincolnshire to inform the EIA baseline and should comprise a staged programme of non-intrusive and intrusive fieldwork. This is to identify currently unknown archaeological remains and to adequately assess the heritage significance of all potentially affected archaeological assets.	Non-intrusive and intrusive pre-application evaluation surveys have been undertaken to inform the baseline and the assessment of effects in **Application Document 6.10 Chapter 10 Cultural Heritage**. The results, which are submitted as **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report** and **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report**, have identified known and previously unknown archaeological remains that may be affected by the Project and have informed the scope of archaeological mitigation secured in **Application Document 7.9 Outline Archaeological Written Scheme of Investigation** and **Application Document 7.10 Outline Cultural Heritage Management Plan**.
This will ensure there is sufficient information to assess the impacts of the proposals and design appropriate mitigation in accordance with the relevant national and local planning policies (NPS-EN-1; NPPF, para 194; North Lincolnshire Core Strategy CS6, and North Lincolnshire Local Plan HE5, HE8 and HE9, and LC14.	The archaeological evaluation results, which are submitted as **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report** and **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report**, have identified known and previously unknown archaeological remains that may be affected by the Project. The results have informed the assessment of effects in **Application Document 6.10 Chapter 10 Cultural Heritage** and the scope of archaeological mitigation secured in **Application Document 7.9 Outline Archaeological Written Scheme of Investigation** and **Application Document 7.10 Outline Cultural Heritage Management Plan**.
All final archaeological evaluation reports should be appended to the ES.	The final evaluation reports are submitted as **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report** and **Application Document 6.10.A8 Appendix 10.8 Archaeological Trial Trench Evaluation Report.**
A Heritage and Archaeological Management Plan should be submitted with the ES setting out appropriate measures to avoid harm, enhance and conserve the heritage assets and their settings.	A cultural heritage management plan setting out appropriate measures for cultural heritage assets, including preservation measures and a procedure for unexpected archaeological

North Lincolnshire Council to Planning Inspectorate Comment	National Grid Response
	discoveries, is submitted as **Application Document 7.10 Outline Cultural Heritage Management Plan**.
Where harm to archaeological remains is unavoidable and justifiable, the Management Plan should outline the location, scope and extent of appropriate programmes of archaeological excavation and recording in advance of and/or during construction.	An archaeological mitigation strategy, which sets out the location, scope and strategy for the recording of heritage assets that may be wholly or partially lost because of the Project, has been agreed with the Archaeological Advisors to the relevant local planning authority. The works will be carried out in advance of and/ or during construction and are detailed in **Application Document 7.9 Outline Archaeological Written Scheme of Investigation**.
The Heritage and Archaeological Management Plan should be appended to the CEMP with other Management Plans.	A cultural heritage management plan setting out appropriate measures for cultural heritage assets, including preservation measures and a procedure for unexpected archaeological discoveries, is submitted as **Application Document 7.10 Outline Cultural Heritage Management Plan**
Ecology/Ornithology	
The surveys proposed in section 8.7 of the submitted EIA Scoping Report Chapter 8 appear sensible. The proposed approach has taken into account our pre-scoping advice, issued in May of this year.	National Grid notes this feedback.
Flood Risk and Drainage	
The Lead Local Flood Authority has no objection to the proposed approach to the assessment of the potential impacts in respect of flood risk and drainage.	National Grid notes this feedback.
However, it is noted that the site lies within the Internal Drainage Board area of jurisdiction, so they need to be consulted on discharge rates/connections/alterations to the watercourse network.	National Grid notes this feedback.
This consultation should form part of the development of the surface water drainage strategy required to support the application.	National Grid notes this feedback.

North Lincolnshire Council to Planning Inspectorate Comment	National Grid Response
Landscape and Visual Amenity	
The proposed approach to landscape impacts, as set out in the submitted EIA Scoping Report Chapter 6, has taken into account our pre-scoping advice, issued in May of this year and appears to be appropriate.	National Grid notes this feedback.
Similarly, the proposed approach to visual impacts, as set out in the submitted EIA Scoping Report Chapter 7, closely matches our pre-scoping advice, issued in May of this year and is considered to be acceptable.	National Grid notes this feedback.
Local Planning Policy	
The Scoping Report at Chapter 2 identifies the relevant development plan documents for North Lincolnshire and also recognises that the new North Lincolnshire Local Plan is currently at an early stage of examination. It is considered that the correct policy documents have been identified to allow a robust assessment of the planning policy context relevant to North Lincolnshire.	National Grid notes this feedback.
Noise	
The Scoping Report confirms that a noise assessment will be submitted with any future application which includes: • Construction phase noise and vibration impact • Construction phase traffic noise	As set out in **Application Document 6.4 Chapter 4 Description of the Project** flexibility is required on conductor type in two locations. **Application Document 6.16 Chapter 16 Noise and Vibration** also makes an assessment of operational noise in these locations.
Operational phase noise impacts have been screened out of any future assessment with the following justification: *"Operational noise from the OHL is not likely to be significant at nearby NSRs under any weather conditions owing to the proposed 'triple Araucaria' conductor bundle (section 15.5) and is therefore proposed to be scoped out of the noise and vibration assessment. Should the iterative design process result in alternative conductor*	

North Lincolnshire Council to Planning Inspectorate Comment	National Grid Response
types being used, consideration for this would be assessed within the noise and vibration assessment. *Technical information would be submitted as part of the application for development"*	
The LPA support the need for technical information to be submitted within any future application to fully justify this matter.	
Traffic and Transport	
Having reviewed Chapter 13 of the Scoping Report, the local highway authority are content with the proposed approach to assessing the Traffic and Transport impacts of the proposed development.	National Grid notes this feedback.
Socio Economic	
Chapter 16 of the Scoping Report addresses the potential socio economic impacts of the proposed scheme.	National Grid notes this feedback.
The local planning authority has no objection to the proposed approach to the assessment of socio-economic impacts, including the potential impacts on recreation and tourism.	National Grid notes this feedback.
Cumulative Effects	
The LPA is satisfied with the approach to the assessment of cumulative effects, but would expect to be consulted with regards to agreeing the short list of other existing development and/or approved development.	The proposed list of other developments to be considered in the inter-project cumulative effects assessment was provided as part of the statutory consultation within the Preliminary Environmental Information Report.
This scoping response has been prepared in line with my knowledge and understanding of the site and environment, the nature of existing operations on adjacent sites and the nature of development at the time of writing.	National Grid notes this feedback.
Please do not hesitate to contact me should you wish to discuss the contents of this letter.	National Grid notes this feedback.

1.20 Before You Dig

Table 1.19 – Before You Dig

Before You Dig Comment	National Grid Response
NGN has a number of gas assets in the vicinity of some of the identified “site development” locations. It is a possibility that some of these sites could be recorded as Major Accident Hazard Pipelines(MAHP), whilst other sites could contain High Pressure gas and as such there are Industry recognised restrictions associated to these installations which would effectively preclude close and certain types of development. The regulations now include “Population Density Restrictions” or limits within certain distances of some of our “HP” assets.	National Grid has conducted desk based utilities surveys and identified any high pressure gas pipelines within proximity to the project. National Grid has continued to engage with these utility operators through development of the Project. Consideration of underground utilities will continue as the project progresses through detailed design and construction.
The gas assets mentioned above form part of the Northern Gas Networks “bulk supply” High Pressure Gas Transmission” system and are registered with the HSE as Major Accident Hazard Pipelines.	
Any damage or disruption to these assets is likely to give rise to grave safety, environmental and security of supply issues.	
NGN would expect you or anyone involved with the site (or any future developer) to take these restrictions into account and apply them as necessary in consultation with ourselves. We would be happy to discuss specific sites further or provide more details at your locations as necessary.	
If you give specific detailed site locations, we would be happy to provide gas maps of the area which include the locations of our assets.	
(In terms of High Pressure gas pipelines, the routes of our MAHP’s have already been lodged with members of the local Council’s Planning Department)	

1.21 Nottinghamshire County Council

Table 1.20 – Nottinghamshire County Council

Nottinghamshire County Council Comment	National Grid Response
Thank you for your email dated 21st August 2023 requesting strategic planning observations on the above document. I have consulted with my colleagues across relevant divisions of the County Council and have the following comments to make.	National Grid notes this feedback.
In terms of the County Council's responsibilities there are a number of elements of national planning policy and guidance that are of particular relevance in the assessment of such applications, these include Transport and Public Health.	National Grid notes this feedback.
Rights of Way	
NCC are happy to see that the potential impacts on the network, such as mitigation/effect on views, management of the network during construction and impacts on public use will be considered in the application and are addressed in the visual study (Ch 7), recreation (Ch 13) and traffic/transportation (Ch 16).	National Grid notes this feedback.
NCC will provide further details, if necessary, in the next stage of the application.	National Grid notes this feedback.
Archaeology	
The Environmental Scoping Report for the North Humber to High Marnham Great Grid Upgrade sets out the proposed approach regarding Heritage in Chapter 9.	National Grid notes this feedback.
The details of the scheme such as route are currently not defined but archaeological assessment and evaluation will help to meet the stated aims of avoiding designated assets and non-designated assets	Archaeological evaluation results, which are submitted as **Application Document 6.10.A6 Appendix 10.6 Geophysical Survey Report** and **Application Document 6.10.A8 Appendix 10.8**

Nottinghamshire County Council Comment	National Grid Response
of equivalent value and minimizing impacts on other heritage assets and considerations such as setting. Sufficient evaluation is essential to inform the scheme and ensure that the subsequent design and work programme is devised with an understanding of the level of archaeological work that may be required before and during the construction phase, and whether any work would be required to mitigate impacts from future maintenance and decommissioning.	**Archaeological Trial Trench Evaluation Report**, have identified known and previously unknown archaeological remains that may be affected by the Project. The results have allowed heritage assets to be avoided by the design and have informed the assessment of effects in **Application Document 6.10 Chapter 10 Cultural Heritage.**
The Environmental Impact Assessment (EIA) will require a desk-based assessment as stated in Chapter 9 which will identify areas for follow-up evaluation including non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact. Non-intrusive techniques and intrusive evaluation are affective for management of archaeological risk. The results of this work should be used to minimise the impact on the historic environment, provide input to project scheduling and to inform the design. This in turn will inform the production of an appropriate archaeological mitigation strategy.	Detailed in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report** and **Application Document 6.10 Chapter 10 Cultural Heritage**.
The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), and the National Planning Policy Framework. Failing to adequately assess the archaeological potential could lead to unnecessary destruction of heritage assets, potential programme delays and cost increases that could otherwise be avoided.	Detailed in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report** and **Application Document 6.10 Chapter 10 Cultural Heritage**. A staged programme of archaeological evaluation has informed the assessment of archaeological potential in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report.** The scope of each evaluation survey was agreed with the Archaeological Advisor to the relevant local planning authority.
The details of any surveys and evaluation will need to be agreed as early as possible and each stage of investigation will inform the nature, location and extent of the next.	

Nottinghamshire County Council Comment	National Grid Response
Highways	
NCC have no comments at this stage. A Transport Assessment will be submitted at a later stage of the application and NCC will be happy to agree the scope with the relevant highway authorities.	A transport assessment has been provided at **Application Document 7.15 Transport Assessment** and the assessment of effects on transport users is provided in **Application Document 6.14 Chapter 14 Traffic and Transport**, the scope of these documents has been discussed with the local highways authority.
It should be noted that consideration should be given to the redevelopment of West Burton with the STEP fusion plant, from a highways perspective.	**Application Document 6.14 Chapter 14 Traffic and Transport** sets out which developments have been considered as future baseline and **Application Document 6.21 Chapter 21 Inter-project Cumulative Effects** assesses the potential inter-project cumulative effects with other developments**.**
Ecology	
NCC have reviewed the EIA Scoping Report documents for the North Humber to High Marnham grid upgrade project, specifically Volume 1, chapter 8 (Ecology and Biodiversity) and associated figures in Volume 3, but only in relation to that part of the project lying within Nottinghamshire.	National Grid notes this feedback.
NCC are in agreement with the proposed scope of the EIA, which looks to be comprehensive and accords with recognised guidelines for such assessments. NCC however, have the following comments: • Para. 8.4.5 refers to Nottinghamshire's Notified Road Verges, and the need to request this information - NCC can supply this data when required. • Regarding proposed VP surveys for birds, it is stated that work is ongoing to determine a short-list of VPs that will be taken forward to the final survey design. It would be useful to better understand what criteria are being used for this exercise, noting that in Nottinghamshire the route lies between the River Trent to the east and a number of important wetland sites to the west, such as the Idle Washlands and Idle Valley Nature Reserve (as identified in the pre-scoping engagement).	The assessment of the Project on birds is set out in **Application Document 6.9 Chapter 9 Ornithology** which presents the data that has been used to inform the baseline conditions and the selection of VPs.

Nottinghamshire County Council Comment	National Grid Response
Flood Risk	
NCC have reviewed the EIA scoping report, this appears to suitably note all relevant policy and consents and as such the LLFA have no comments to make at this stage.	National Grid notes this feedback.
Economic Development	
This is a comprehensive scoping report. The main socio-economic impacts appear to be identified and scoped in.	National Grid notes this feedback.
The report needs to consider the impact on these other major renewable energy projects. Notably the East Coast Hydrogen Strategy roadmap and the STEP Fusion project.	Cumulative socio-economic effects of the Project and other nearby schemes have been assessed within Application **Document 6.21 Chapter 21 Inter Project Cumulative Effects.**
There is an odd reference to there being no socio-economic legislative framework, whilst also citing the equalities act and separately potential crime impacts. There is plenty of employment legislation for disabilities and NEET provision which could also want a specific mention. As an anchor institution the report could better identify how the hardest to engage employment groups are to be impacted, particularly bearing in mind the potential for the project to support the Government mission statements on levelling up.	**Application Document 7.21 Equality Impact Assessment** has been provided with the application for development consent.
Public Health	
Please refer to Appendix 1 which sets out further information in relation to Public Health.	National Grid notes this feedback.
Conclusion	
It should be noted that all comments contained above could be subject to change, as a result of ongoing negotiations between the County Council, the Local Planning Authority and the applicants. These comments are based on the information supplied and are	National Grid notes this feedback.

Nottinghamshire County Council Comment	National Grid Response
without prejudice to any comments the County Council may make on any future planning applications submitted for this site.	
Should you require any further assistance in relation to any of these matters please do not hesitate to contact me.	National Grid notes this feedback.
Appendix 1 - Public Health	
The Public Health response is outlined below however if any further information is required, the Public Health team will be able to provide further advice via email planning.publichealth@nottscc.gov.uk	National Grid notes this feedback.
The Nottinghamshire Health and Wellbeing Strategy sets out the ambitions and priorities for the Health and Wellbeing Board with the overall vision to improve the health and wellbeing of people in Nottinghamshire: • To give everyone a good start in Life • To have healthy and Sustainable places • To enable healthier decision making • To work together to improve healthcare services	National Grid notes this feedback.
The Nottinghamshire Joint Strategic Needs Assessment (JSNA) provides a picture of the current and future health needs of the population of the county. This is a useful source of information when considering the health and wellbeing of residents in planning process.	National Grid notes this feedback.
The use of local health profile report pulls together existing information in one place about localities affected by a development proposal, highlights issues that can affect health and wellbeing of residents covered within the planning process. Promoting health and wellbeing enhances resilience, employment and social outcomes. For example, consider limiting long term illness or disability as part of the development needs of a localities to ensure that it is age friendly providing good access to health and social care facilities.	National Grid notes this feedback.

Nottinghamshire County Council Comment	National Grid Response
The Nottinghamshire Spatial Planning and Health Framework identifies that local planning policies play a vital role in ensuring the health and wellbeing of the population and how planning matters impact on health and wellbeing locally. In addition, a health checklist is included to be used when developing local plans and assessing planning applications:	National Grid notes this feedback.
It is recommended that this checklist is completed to enable the potential positive and negative impacts of the EIA on health and wellbeing to be considered in a consistent, systematic and objective way, identifying opportunities for maximising potential health gains and minimizing harm and addressing inequalities taking account of the wider determinants of health.	The Nottinghamshire Rapid Health Impact Assessment Checklist has been considered as part of the assessment of health and wellbeing effects presented in **Application Document 6.18 Chapter 18: Health and Wellbeing**. In line with IEMA's (now ISEP's) (2022) Guide to Effective Scoping of Human Health in Environmental Impact Assessment, the assessment considered the following health determinants, which are also reflected within the Checklist: access to health and social care services; employment and income; education and training; transport modes, access and connectivity; air quality; noise and vibration; open space, leisure and play; climate change mitigation and adaptation; water quality; and community identity, culture, resilience and influence. Chapter 17 of the Scoping Report provided details of the potential health effects identified and the rationale for scoping out certain health determinants. The assessment methodology, set out in **Application Document 6.18 Chapter 18 Health and Wellbeing**, follows relevant guidance and best practice, including IEMA's (ISEP's) (2022) Guide to Determining Significance for Human Health in Environmental Impact Assessment. Effects are assessed using defined sensitivity and magnitude criteria and evaluated through a significance matrix. The assessment takes account of embedded mitigation measures and concludes that all residual health and wellbeing effects are not significant; therefore, no additional mitigation is required.

Nottinghamshire County Council Comment	National Grid Response
Obesity is a major public health challenge for Nottinghamshire. Obesity is a complex problem with many drivers, including our behaviour, environment, genetics and culture. Nearly a quarter of children in England are obese or overweight by the time they start primary school aged five, and this rises to one third by the time they leave aged 11.	National Grid notes this feedback.
To address Childhood Obesity in 10-11-year olds. It is recommended that the six themes by the TCPA document Planning Healthy Weight Environments' are considered to promote a healthy lifestyle as part of this application.	National Grid notes this feedback.
In addition to Active Design Sport England 10 principles that promote activity, health and stronger communities through the way our towns and cities are built and designed to encourage activity in our everyday lives.	National Grid notes this feedback.
The six TCPA themes are 1. Movement and access: Walking environment; cycling environment; local transport services 2. Open spaces, recreation and play: Open spaces; natural environment; leisure and recreational spaces; play spaces. 3. Food: Food retail (including production, supply and diversity); food growing; access. 4. Neighbourhood spaces: Community and social infrastructure; public spaces. 5. Building design: Homes; other buildings. 6. Local economy: Town centres and high streets; job opportunities and access	National Grid notes this feedback.

Nottinghamshire County Council Comment	National Grid Response
The Ten Principles of Active Design 1. Activity for all 2. Walkable communities 3. Connected walking & cycling routes 4. Co-location of community facilities 5. Network of multifunctional open space 6. High quality streets & spaces 7. Appropriate infrastructure 8. Active buildings 9. Management, maintenance, monitoring & evaluation 10. Activity promotion & local champions	National Grid notes this feedback.
Please note for major developments (over 25 dwellings) the Clinical Commissioning Groups (CCG) should be consulted for impact on primary care which may lead to a request for infrastructure support through S106/CIL.	The Project is a proposed overhead line and does not include residential development.
Bassetlaw developments contact Bassetlaw Strategic Estates Group. Nottinghamshire developments email the Nottingham and Nottinghamshire Estates team Noweccg.estates@nhs.net	National Grid notes this feedback.

1.22 Rotherham Council

Table 1.21 – Rotherham Council

Rotherham Council Comment	National Grid Response
I can confirm that Rotherham Council have no comments to make on the EIA scoping notification.	National Grid notes this feedback.

1.23 Royal Mail

Table 1.22 – Royal Mail

Royal Main Comment	National Grid Response
Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.	National Grid notes this feedback.
Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.	National Grid notes this feedback.
Royal Mail's advisor BNP Paribas Real Estate has reviewed the ES Scoping Report for this scheme dated August 2023. There are numerous operational Royal Mail properties within 10 miles of the scoping area, the nearest operational facilities being at Brough, Hessle, Scunthorpe and Gainsborough.	National Grid notes this feedback.
The construction of this infrastructure proposal has been identified as having potential to impact on Royal Mail operational interests. However, at this time Royal Mail is not able to provide a consultation response due to insufficient information being available to adequately assess the level of risk to its operation and the available mitigations for any risk. Consequently, at this point Royal Mail wishes to reserve its position to submit a consultation response/s at a later stage in the	National Grid notes this feedback.

consenting process and to give evidence at any future Public Examination, if required.	
In the meantime, any further consultation information on this infrastructure proposal and any questions of Royal Mail should be sent to:	National Grid notes this feedback.

1.24 South Cave Parish Council

Table 1.23 – South Cave Parish Council

South Cave Parish Council Comment	National Grid Response
The Parish Council's original recommendation which was submitted, for the proposed route from Woodale to past Broomfleet, would be to run cables underground. This would ensure no settlement would be enclosed within two rows of surface pylons.	National Grid notes this feedback.
The Parish Council raised the following concerns relating to the proposals, which include the impact on the economy, environment, wildlife & visual amenity of the area:	National Grid notes this feedback.
1. Overhead high voltage power lines are not a 'fit and forget' piece of infrastructure, they will require access by both land and air, for maintenance purposes including component replacement, painting etc. and create significant noise especially when the air is damp, and also the possible health risks.	National Grid
2. Visual Amenity impact on the Conservation Area if the lines are overhead.	The presence of the Conservation Area was used to inform the value of the baseline views as reported in **Application Document 6.7.A4 Appendix 7.4 Visual Baseline and Assessment**. The heritage significance of South Cave Conservation Area is assessed in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report** where it is considered to be of medium heritage value containing one Grade II* listed building and 17 Grade II listed buildings. The asset is over 1 km from the LoD for the proposed overhead line and as an asset of medium value it does not meet the criteria for assessment of assets between 1km and 3km from

	the LoD for the proposed overhead line which is reserved for assets of the highest value. The rationale for the study areas used in the assessment is provided in **Application Document 6.10.A2 Appendix 10.2 Cultural Heritage Baseline Report**. No impacts are predicted to South Cave Conservation Area
3. The importance of the views and footpath of the Wolds Way should be preserved along with the mature woodlands	Impacts on walkers, cyclists and horse riders are discussed in the Environmental Statement (ES) in **Application Document 6.14 Chapter 14 Traffic and Transport**, **Application Document 6.17 Chapter 17 Socio-economics, Recreation and Tourism** and **Application Document 6.7 Chapter 7 Visual**. An assessment of the visual effects, including the sequential effects, during operation for people using the Yorkshire Wolds Way is provided in **Application Document 6.7.A4 Appendix 7.4 Visual Baseline and Assessment**. As the Yorkshire Wolds Way passes under the new overhead line where it is parallel to the existing overhead line and views are filtered by large woodland blocks, the geographical extent of effects on users of the path has been minimised. Effects on users of the Yorkshire Wolds Way are not considered to be significant in operation.
4. From the interactive maps supplied, they have a very narrow corridor across Woodale and Mount Airy which would grossly impact the landscape, natural habitat and the Wolds Way National Trail.	During the development of the design which is discussed in **Application Document 5.10 Design Approach Document**, the decision was made for the proposed overhead line to parallel the existing overhead line to reduce the spread of landscape and visual effects of infrastructure. The effects on views from the Yorkshire Wolds Way are presented in **Application Document 6.7 Chapter 7 Visual.** As the Yorkshire Wolds Way passes under the new overhead line where it is parallel to the existing overhead line and views are filtered by large woodland blocks, the geographical extent of effects on users of the path has been minimised.

	Effects on users of the Yorkshire Wolds Way are not considered to be significant in operation. Ecology
5. Further information and reassurance are required with regards to the electricity force fields, particularly at the Cross Over point, and the potential impact on the health of humans and livestock.	**Application Document 7.11 Electric and Magnetic Field Compliance Report** has been provided with the application for development consent.
6. Concerns expressed that the lines could become an ecological trap, particularly with regards to migrating birds. The Humber is part of the UNESCO-associated flyway. We are the pathway that thousands of birds cross, and World Heritage are in the process of making the Humber a World Heritage Protected Site. More overhead pylons would obstruct their route, especially with the thicker new lines that are proposed. The area is home to a number of wetlands, where various species of birds flock—into the hundreds/thousands.	**Application Document 6.9 Chapter 9 Ornithology** assesses the effects of the Project on ornithology (birds).

1.25 House of Commons

Table 1.24 – House of Commons

House of Commons Comment	National Grid Response
I fully recognise the vital importance of expanding our energy infrastructure and of strengthening the national grid to support economic growth. But that task need not be carried out over the destruction of natural habitats and over local communities.	The effects of the Project on habitats and species are presented in **Application Document 6.8 Chapter 8 Ecology** and on birds in **Application Document 6.9 Chapter 9 Ornithology**. The effects of the Project on communities are set out in Application **Document 6.17 Chapter 17 Socio-economics, Recreation and Tourism**.
My constituents are quite rightly concerned with the amenity and environmental impact of their surroundings and have over a number of years put time and effort into protecting that end. If these proposals are implemented as they are then the landscape and environment could be completely blighted by pylons and electrical lines.	The effects of the Project on landscape are presented in **Application Document 6.6 Chapter 6 Landscape**. The effects of the Project on visual amenity are presented in **Application Document 6.7 Chapter 7 Visual Amenity**.
My view, and the view shared by many of my constituents and by the Parish Councils, is that the planned new lines should not pass through the area around South Cave, Elloughton-cum-Brough, and Welton—and that anywhere else an underground cable is viable, the transmission should run underground. This would avoid a major loss of amenity and the destruction of the landscape by large pylons.	National Grid has carefully considered the feedback received during, the alternatives available, and other factors including our duties and obligations. These duties include balancing the need to be economic and efficient, which includes keeping costs down in the interests of bill-paying consumers, with a duty to have regard to preserving amenity, which includes the natural environment, cultural heritage, landscape and visual quality. National Policy Statement (NPS) EN-5 (Department for Energy Security & Net Zero, 2025) makes it clear that the Government expects overhead lines to be appropriate in most instances, although it recognises that there may be, at particularly sensitive locations such as National Landscape (previously known as Areas of Outstanding Natural Beauty (AONB)), potential adverse landscape and visual impacts of an overhead line which may make it unacceptable in planning terms, taking account of the specific local environment and context. In this context, it is considered there are
I understand that underground lines are associated with higher installation costs, but the importance of maintaining visual amenity and local support is surely worth some additional financial cost. It should also be noted that overhead lines themselves come with financial and social costs, including noise, maintenance and associated traffic, decreased reliability, the need for access routes, and energy losses.	
The National Grid operates around 1,450 kilometres of underground cabling, approximately 20 percent of its transmission lines. In	

comparison, only a short section of the North Humber to High Marnham line would need to run underground to avoid a dramatic impact on the villages in question.	insufficient policy justifications to use underground cabling in this location.
Residents have also expressed to me that their priority is not for cheaper electivity if the proposals are accepted, but to maintain the visual amenity of their area. Their strong preference is for the cables to be routed underground, and any discussion of compensation through lower electricity bills, while it would be welcome if the project goes ahead, must not distract from the strong preference to avoid overhead lines altogether.	
Where overhead lines are unavoidable, the priority should be ensuring that no settlement is surrounded by two sets of overhead lines and pylons.	
The landscape and habitat though which the transmission line will pass is highly regarded and contains several protected areas and other sites of interest. The area is a key part of the Yorkshire Wolds and Natural England is intending to designate a part of the Yorkshire Wolds as an Area of Outstanding Natural Beauty, subject to further consultation later this year. The Yorkshire Wolds is also designated as an Important Landscape Area in East Riding of Yorkshires Council's Local Plan. The emerging preferred corridor also runs alongside a number of conservation areas whose character would be altered by the addition of new pylons, as well as well as close to the site of Sites of Special Scientific Interest.	Regarding the designation of parts of the Yorkshire Wolds as an Area of Outstanding Natural Beauty (AONB), on 4 February 2026, Natural England issued notice of intention to 'make' the designation Order. The Draft Yorkshire Wolds AONB (Designation) Order 2026 proposes an area slightly larger than the Provisional Candidate Area originally published for consultation; the area expanded as a result of consultation responses. This means that the distance between the proposed boundary to the nearest point of the Limits of Deviation (LoD) is 11.4 km. At this distance, the special qualities and statutory purposes of the AONB are unlikely to be significantly affected by the Project, and no further assessment has been undertaken. **Application Document 6.8 Chapter 8 Ecology** presents an assessment of effects on relevant important ecological features, including protected and notable species and habitats. The assessment was informed by a desk study and field surveys, carried out by suitably experienced (and licenced where required) ecologists at the appropriate times of year.

The wider Humber region is also part of the UNESCO Easy Atlantic highway, a migratory route for birds over Western Europe, and there are concerns that the lines could become an ecological trap for migrating birds. The East Coast Wetlands, including the Humber estuary, is also one of seven sites around the UK being backed by the Government to win World Heritage Status from USECO.	**Application Document 6.9 Chapter 9 Ornithology** assesses the effects of the Project on ornithology (birds).
Moreover, the Wolds Way National Trail, which passes through some of the most tranquil and idyllic section of English countryside, would have yet another electrical transmission line and row of pylons pass over it, with significant impacts on the visual character of the 80-mile walking route. It is important to take account of the abiding importance of maintaining such a highly regarded landscape and habitat in its present form.	Impacts on walkers, cyclists and horse riders are discussed in the Environmental Statement (ES) in **Application Document 6.14 Chapter 14 Traffic and Transport**, **Application Document 6.17 Chapter 17 Socio-economics, Recreation and Tourism** and **Application Document 6.7 Chapter 7 Visual**. National Grid, as part of our iterative design process, has undertaken an assessment to gain an understanding of the existing local road network, the existing Public Rights of Way (PRoW) network and wider connectivity, which the Project may need to utilise during both the construction and operation phases. As part of this assessment, we have worked closely with the local authority to understand and gain information on the local PRoW network. This information has been used to inform and **Application Document 7.6 Public Rights of Way Management Plan**. An assessment of the visual effects, including the sequential effects, during operation for people using the Yorkshire Wolds Way is provided in **Application Document 6.7.A4 Appendix 7.4 Visual Baseline and Assessment**. As the Yorkshire Wolds Way passes under the new overhead line where it is parallel to the existing overhead line and views are filtered by large woodland blocks, the geographical extent of effects on users of the path has been minimised.

1.26 Yorkshire Wildlife Trust

Table 1.25 – Yorkshire Wildlife Trust

Yorkshire Wildlife Trust Comment	National Grid Response
We are aware that the North Humber to High Marnham project is just one part of the National Grid's wider ambition to upgrade and reinforce the high-voltage power network across the UK, with multiple projects currently being rolled out for consultation across the country as part of the Great Grid Upgrade.	National Grid notes this feedback.
We note that we have not received any formal consultation from National Grid about this project despite a significant portion lying within Yorkshire, and request that we are included in any future consultation. We are discussion with Lincolnshire Wildlife Truest, Nottinghamshire Wildlife Trust and the RSPB regarding potential impacts and are supportive of their positions on the project.	Yorkshire Wildlife Trust were consulted during non-statutory and statutory consultation. Responses received during statutory consultation relating to the scope of assessments are included in section 3 of the relevant topic chapters (**Application Documents 6.6 to 6.19**).
Cumulative Impacts	
The Royal Society of Wildlife Trusts (RSWT – the Wildlife trusts umbrella organisation) have previously held conversations with National Grid, and we support their request for all of the work related to upgrading the power network to be considered as a single project and cumulative impact upon ecologically sensitive and biodiverse sites to be fully taken into account, as would be expected as standard practice for any Nationally Significant Infrastructure Projects (NSIP). Our comments therefore relate to local considerations. Whilst the information available at the current time is high level, we would like to make the following comments.	National Grid notes this feedback.

Yorkshire Wildlife Trust Comment	National Grid Response
Statutory and Non-Statutory Designated Sites	
The mitigation hierarchy must be applied in any route design, and the key consideration is the presence of statutory and non-statutory designated sites, and the avoidance of impacts on these sites. Whilst Yorkshire Wildlife Trust Reserves do not appear to be directly affected by the route (which runs to the south of our North Cave Reserve), we are supportive of other Wildlife Trusts in highlighting potential damaging impacts on their reserves.	National Grid notes this feedback.
We draw particular attention to Local Wildlife Sites (LWS), due to their non-statutory protection, which can leave them particularly vulnerable to impacts.	**Application Document 6.8 Chapter 8 Ecology** presents an assessment of effects on relevant important ecological features, including local non-statutory sites.
LWS (formerly known as Sites of Importance for Nature Conservation) are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature's recovery. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites – improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.	**Application Document 6.8 Chapter 8 Ecology** presents an assessment of effects on relevant important ecological features, including non-statutory designated sites. The assessment was informed by a desk study and field surveys, carried out by suitably experienced (and licenced where required) ecologists at the appropriate times of year. Appropriate mitigation is outlined in **Application Document 6.8 Chapter 8 Ecology**, **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.
For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature's recovery.	**Application Document 6.8 Chapter 8 Ecology** presents an assessment of effects on relevant important ecological features, including non-statutory designated sites. The assessment was informed by a desk study and field surveys, carried out by suitably experienced (and licenced where required) ecologists at the appropriate times of year. Appropriate mitigation is outlined in **Application Document 6.8 Chapter 8 Ecology**, **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.

Yorkshire Wildlife Trust Comment	National Grid Response
In circumstances where applications which impact upon LWS are approved because of 'over-riding need', then robust mitigation and compensation **must** be incorporated. National Grid must provide a detailed inventory of Local Wildlife Sites potentially impacted by the project, and a detailed description of the potential impacts. Please also provide the layers for the proposed route corridor in GIS Shape file format to allow us to scrutinise the route further.	**Application Document 6.8 Chapter 8 Ecology** presents an assessment of effects on relevant important ecological features, including non-statutory designated sites. The assessment was informed by a desk study and field surveys, carried out by suitably experienced (and licenced where required) ecologists at the appropriate times of year. Appropriate mitigation is outlined in **Application Document 6.8 Chapter 8 Ecology**, **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.
It is essential that National Grid indicate how the project will avoid impacts on Wildlife Trust Reserves, statutory and non-statutory sires through micro-siting. Mitigation and compensation will need to be provided for any impacts which have not been avoided through the iterative design process.	Through careful routing and siting National Grid have aimed to avoid designated ecological sites as far as practicable. **Application Document 6.8 Chapter 8 Ecology** presents an assessment of effects on relevant important ecological features, including statutory and non-statutory designated sites. Appropriate mitigation is outlined in **Application Document 6.8 Chapter 8 Ecology**, **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.
Lowland Peat	
The project cuts through the Humberhead Levels peatlands, the most concentrated area of lowland peat in the country. The Humberhead Levels spans the key areas of the inner section of the River Humber and the mosaic of sites that cluster around the Humberhead Levels National Nature Reserve (NNR), and straddles the boundaries of Yorkshire, Lincolnshire and Nottinghamshire.	National Grid notes this feedback.
The Humberhead Levels Partnership (of which Yorkshire Wildlife Trust plays an active part) is a collaboration of organisations working together to enhance habitat and increase connectivity across this region. A Nature for Climate Peatland Restoration Grant is being used undertake survey and monitoring work of lowland peat in Thorne and Hatfield Moors National Nature Reserve to guide future restoration work.	National Grid notes this feedback.

Yorkshire Wildlife Trust Comment	National Grid Response
Impacts to peat will need to be fully assessed as part of the project and when seeking to deliver Biodiversity Net Gain (BNG – see below), the Humberhead Levels would be the most appropriate area to direct funding.	There are areas of the Willingham association (extremely calcareous silty and clayey soils, in places humose, and often over peat) mapped near Gringley on the Hill. The ALC surveys have assessed soil characteristics from which the presence or absence of peat has been assessed. The ALC surveys have identified locations where subsurface peaty/organic horizons are present (**Application Document 6.13.A2 Appendix 13.2 Agricultural Land Classification Survey report**). In most cases these horizons occur beneath mineral upper horizons and are of limited thickness. In line with accepted definitions, peat is generally distinguished from mineral soil by organic matter (OM) content and depth (Hodgson, 2022). Soils with OM content greater than 12% being a peaty loamy, and over 50% being peat, and with deposits greater than 40 cm often treated as deep peat; on this basis, only a small number of recorded horizons would qualify as deeper peat deposits, while most represent thinner peat, peaty pockets or peaty subsoil horizons. In areas where these surveys identify that peat or organic-rich soils are present and will interact with excavations deep enough to disturb the peat(y) horizon, a further survey will be undertaken to record peat depth and stratigraphy. This survey information will be used to develop further the mitigation measures as part of the Soil Management Plan (which will include reference to peat where applicable).
Grassland and Pollinators	
Grassland and Pollinators was a project based on the B-lines initiative mapping project (Buglife) and project sites may lie within the scheme area. Any impacts on these grasslands must be identified and avoided, and if unavoidable then mitigated and compensation. Trough BNG, there is the potential to further enhance grasslands for pollinators in the project area.	**Application Document 6.8 Chapter 8 Ecology** presents an assessment of effects on relevant important ecological features, including protected and notable species and habitats, including grasslands. The assessment was informed by a desk study and field surveys, carried out by suitably experienced (and licenced where required) ecologists at the appropriate times of year. The dominant habitat type within the Order Limits is arable. Most habitats will be reinstated post construction, except for trees which could impact operation of the overhead line. Appropriate mitigation is outlined in

Yorkshire Wildlife Trust Comment	National Grid Response
	Application Document 6.8 Chapter 8 Ecology, **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**. A BNG assessment is presented in **Application Document 7.1 Biodiversity Net Gain Report**.
Potential Bird Strike Risk	
Whilst we understand that there are existing overhead lines along much of the routes, we may wish to comment further on the potential risk of bird strike with the overhead lines. The area of most concern is the crossing of the Ouse (just west of Blacktoft) – the importance of this location as a migratory route, particularly for wildfowl and waders should be fully established. The importance of this area is highlighted not only by the numerous designations but also by the consideration of the East Atlantic Flyway migratory route as a UNESCO world heritage site.	**Application Document 6.9 Chapter 9 Ornithology** assesses the impact of the Project on birds which includes the consideration of collision risk (bird strike) in areas where this collision risk is higher bird diverters have been proposed as part of the Project as set out in **Application Document 7.3 Register of Environmental Actions and Commitments**.
The potential for bird strike should be fully explored as part of the Environmental Impact Assessment and Habitats Regulations Assessment. We would advise that the applicant seeks out date on the number of strikes, particularly on waterfowl, and waders which are the species most likely to be impacted. Any impact of land functionally linked to the Humber Estuary Special Protection Area (SPA) will need to be fully explored.	
Please ensure that the RSPB are fully consulted on the proposals.	**Application Document 6.9 Chapter 9 Ornithology** sets out the engagement with the RSPB that has informed the assessment of effects.
Biodiversity Net Gain	
A completed Defra V4.0 metric should be submitted for scrutiny, along with the required supplementary documentation to illustrate that the ten good practice principles for Biodiversity Net Gain have been	In recent years, the UK Government has introduced legislation and policy that puts biodiversity at the heart of the planning system. The Department for Environment, Food and Rural Affairs (Defra),

Yorkshire Wildlife Trust Comment	National Grid Response
applied. Template documents are available at https://cieem.net/resource/biodiversity-net-gain-report-and-audit-templates/.	describes Biodiversity Net Gain (BNG) as an approach to development that makes sure habitats for wildlife are left in a measurably better state than they were before development (Defra, 2026). The statutory requirement for Nationally Significant Infrastructure Projects (NSIPs) to achieve a specified biodiversity gain objective (as set out in a biodiversity gain statement) will be mandatory for applications made from 2 November 2026. The biodiversity gain objective for energy NSIPs, as set out in Nationally Significant Infrastructure Projects: Biodiversity Gain Statement for Energy (Defra, 2026), will require that the biodiversity value attributable to a development exceeds the pre-development biodiversity value of the on-site habitat by at least 10%. This is referred to as 10% BNG. The Project application for development consent is being submitted prior to 2 November 2026 and therefore the provision of 10% BNG is not mandatory. Notwithstanding, the Overarching National Policy Statement for Energy (EN-1) (Department for Energy Security and Net Zero, 2025) states that NSIPs should seek opportunities to provide BNG, including wider environmental gains and benefits to local communities and national policy priorities, where possible, and the Secretary of State should give appropriate weight to environmental net gain and BNG during decision making. However,10% BNG is not a legal requirement for this application for development consent. National Grid's environmental and social commitments in its Social and Environmental Action Plan (National Grid, 2026) include a commitment to deliver a minimum of 10% BNG with potential for wider environmental and societal benefits for all developments for which planning permission or development consent is required. Therefore, the Project proposes to deliver 10% BNG with potential for wider environmental and societal benefits on a voluntary basis, and substantively follows the guidance set out in Nationally Significant
The metric calculations should include all construction compounds and working areas where appropriate. The loss of habitats within Local Wildlife Sites should be assigned the appropriate 'Strategic significance' category, and it should be noted that it is not possible to account of losses or irreplaceable habitat within the metric.	
One of The Wildlife Trusts' strategic aims is to make it normal practice for all residential, commercial and infrastructure development to contribute positively to nature's recovery on land and at sea. Biodiversity Net Gain, implemented in the right way, is therefore an important mechanism to help achieve The Wildlife Trusts' ambition.	
National Grid should be seeking to achieve a minimum of 10% Biodiversity Net Gain through this project. As detailed above, the peat restoration projects associated with the Humberhead Levels would be the most appropriate mechanism to delivery BNG.	

Yorkshire Wildlife Trust Comment	National Grid Response
	Infrastructure Projects: Biodiversity Gain Statement for Energy (Defra, 2026). Detail on the Project's approach to voluntary BNG is provided in **Application Document 7.20 Design Development Report - 2025** and **Application Document 7.1 Biodiversity Net Gain Report**.
Working Methods	
Please note that where trenchless technology is proposed, this is not without ecological impacts and working areas such as thrusting and receiving pits must be located well outside any sensitive areas.	National Grid notes this feedback.
If 24 hour working is proposed, the potential impacts on nocturnal wildlife must be fully accounted for in the Ecological Impact Assessment.	**Application Document 6.8 Chapter 8 Ecology** presents an assessment of effects on relevant important ecological features, including protected and notable species. This assessment considers disturbance impacts on relevant species due to lighting and other factors. Appropriate mitigation is outlined in **Application Document 6.8 Chapter 8 Ecology**, **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.
We have expectations about minimum standards required during the works, which would include (but is not restricted to) the following:	
• A full time Ecological Clerk of Works (ECoW)	An EcOW will be available during the construction phase of the Project to provide ecological support and guidance where needed as set out in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**
• Rigorous ecological assessment of any yards, lay down areas, compounds and access routes which are determined after consent has been granted	Pre-construction ecological surveys will be carried out as required to provide up-to-date information.

Yorkshire Wildlife Trust Comment	National Grid Response
• Updating ecological surveys to be undertaken in accordance with best practice guidelines, and appropriate walkthrough surveys undertaken prior to works in particular areas, where required e.g. badger sett walkover surveys.	Pre-construction ecological surveys will be carried out as required to provide up-to-date information and to inform any mitigation and licensing requirements. Surveys will be carried out in line with best practice guidelines.
• All environmental issues including protected species risks, watercourses etc. to be appropriately fenced and signposted	Measures that will be employed are presented in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.
• The use of trackway/bog matting to protect sensitive habitats	Measures that will be employed are presented in **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**.
• A detailed Construction Environmental Method Statement	Detailed construction method statements will be developed in line with the commitments set out in **Application Document 7.2 Outline Code of Construction Practice, Application Document 7.3 Register of Environmental Actions and Commitments** and **7.8 Outline Landscape and Ecology Management Plan**
I trust these comments are helpful. Please get in touch if you require any clarification.	National Grid notes this feedback.

1.27 South Leverton Parish Council

Table 1.26 – South Leverton Parish Council

South Leverton Parish Council Comment	National Grid Response
We are aware residents of South Leverton are concerned about the project. The main issues raised are:	National Grid notes this feedback.
• Proximity to the village	The effects on views from the parish of South Leverton is considered in **Application Document 6.7.A4 Appendix 7.4 Visual Baseline and Assessment**. This has identified a moderate adverse (significant) effect as the Project introduces new pylons into the views to the west of the community area, which is currently unaffected by existing pylons. Whilst acknowledging that there will be significant adverse effects in the area of South Leverton, National Grid considers that the proposed design represents an appropriate balance between the identified need for the infrastructure and the environmental effects associated with delivery.
• Visual impact, the proposed swathe going on top of windmill - local landmark	During design development, comments received on the windmill and its importance as a local landmark were considered. This resulted in routeing the overhead line further west to increase distance from the windmill and reduce impacts to the windmill and its visitors. It is acknowledged in the visual assessment presented in **Application Document 6.7 Chapter 7 Visual** that the introduction of a new overhead line into views where there is no existing electrical infrastructure would have a significant effect and will detract from scenic views but would not be of a scale to dominate the windmill in the landscape.

South Leverton Parish Council Comment	National Grid Response
• Disturbance of the construction, maintenance and upkeep of pylons	A description of construction and maintenance is provided in **Application Document 6.4 Chapter 4 Description of the Project** and are assessed as appropriate within each of the topic chapters **Application Document 6.6 to 6.19**.
• Access roads unsuitable for heavy vehicles, many weak bridges above tributaries leading to the Trent	Construction traffic routes have been developed in discussion with the relevant local highways authorities which has considered the location of weak bridges and road that are unsuitable for heavy goods vehicles.
• The local wildlife and environment with multiple areas of conservation around the proposed swath	**Application Document 6.8 Chapter 8 Ecology** presents an assessment of effects on relevant important ecological features, including protected and notable species and habitats. The assessment was informed by a desk study and field surveys, carried out by suitably experienced (and licenced where required) ecologists at the appropriate times of year. Appropriate mitigation is outlined in **Application Document 6.8 Chapter 8 Ecology**, **Application Document 7.2 Outline Code of Construction Practice** and **Application Document 7.3 Register of Environmental Actions and Commitments**. A BNG assessment is presented in **Application Document 7.1 Biodiversity Net Gain Report**.
• The existing pylon corridors / routes East of the village not being looked at Health concerns	Potential effects on health and wellbeing have been assessed in **Application Document 6.18 Chapter 18: Health and Wellbeing**. The assessment follows relevant guidance and best practice and considered a range of health determinants. The assessment concludes that, with embedded mitigation in place, all residual health and wellbeing effects are not significant.
• Reason for new grid lines with ongoing project of West Bruton Nuclear fusion and solar projects nearby.”	The potential for cumulative effects with other developments is presented in **Application Document 6.21 Chapter 21 Inter-project Cumulative Effects**.

1.28 South Yorkshire Mayoral Combined Authority Executive

Table 1.27 – South Yorkshire Mayoral Combined Authority Executive

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

1.29 The Coal Authority

Table 1.28 – The Coal Authority

The Coal Authority Comment	National Grid Response
Thank you for your notification of 23 August 2023 seeking the views of the Coal Authority on the above.	National Grid notes this feedback.
I have checked the site location plan against our coal mining information and can confirm that, whilst the proposed development site falls within the coalfield, it is located outside the Development High Risk Area as defined by the Coal Authority.	National Grid notes this feedback.
On this basis, the Planning team at the Coal Authority have no comments to make.	National Grid notes this feedback.
Please do not hesitate to contact us if you would like to discuss this matter further.	National Grid notes this feedback.

1.30 UK Health Security Agency

Table 1.29 – UK Health Security Agency

UK Health Security Agency Comment	National Grid Response
Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID. The response is impartial and independent.	National Grid notes this feedback.
The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.	National Grid notes this feedback.
Having considered the submitted scoping report we wish to make the following specific comments and recommendations:	National Grid notes this feedback.
Environmental Public Health	
We recognise the promoter's proposal to include a health section. We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures,	**Application Document 6.18 Chapter 18: Health and Wellbeing** presents the assessment of likely significant effects on health and wellbeing arising from the Project. The chapter outlines the relevant legislation and planning policy at the national (including National Policy Statements), regional, and local scale, guidance, existing and

UK Health Security Agency Comment	National Grid Response
conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.	future baseline conditions, assessment methodology, potential effects, mitigation measures and residual effects. The assessment has been undertaken in accordance with relevant policy, guidance and best practice.
In terms of the level of detail to be included in an Environmental Statement (ES), we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*', setting out aspects to be addressed within the Environmental Statement[1]. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.	Public Health England's (2021) Advice on the Content of Environmental Statements Accompanying an Application under the NSIP Regime was considered in the preparation of **Application Document 6.18 Chapter 18: Health and Wellbeing**. The chapter has been prepared having regard to the advice and recommendations set out within the guidance. Where health determinants or impact pathways have been scoped out of the assessment, the rationale for doing so is clearly explained and justified in Chapter 17 of **Application Document 6.5.A1 Appendix 5.1 Environmental Impact Assessment (EIA) Scoping Report**. Further details are also provided within the Preliminary Environmental Information Report (PEIR).
Air Quality	
We note that at this point, an air quality assessment has not yet been undertaken. Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold, i.e., an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.	The assessment has considered the potential effects of construction dust, construction traffic emissions and emissions from construction plant and equipment as set out in **Application Document 6.15 Chapter 15 Air Quality**. Measures to minimise emissions and public exposure to air pollutants have been incorporated into the Project and are set out in **Application Document 7.3 Register of Environmental Actions and Commitments**.

UK Health Security Agency Comment	National Grid Response
EMF sources	
UKHSA requests that the ES includes an assessment of the possible EMF public health impact, to be carried out in line with the following code of practice – Demonstrating compliance with EMF public exposure guideline[1]. The proposer should confirm either that the proposed development does not impact any receptors from potential sources of EMF; or ensure that an adequate assessment of the possible impacts is undertaken and included in the ES.	**Application Document 7.11 Electric and Magnetic Field Compliance Report** accompanies the application for Development Consent.
Human Health and Wellbeing	
This section of OHIDs response, identifies the wider determinants of health and wellbeing we expect the ES to address, to demonstrate whether they are likely to give rise to significant effects. OHID has focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are: • Access • Traffic and Transport • Socioeconomic • Land Use	National Grid notes this feedback.
Having considered the submitted Scoping Report OHID wish to make the following specific comments and recommendations.	National Grid notes this feedback.
Physical activity and active travel / access to open space	
The report identifies significant potential impact through the temporary loss or change in formal Public Rights of Way (PRoW), the existing road network and national cycle networks. Physical activity forms an important part in helping to promote healthy weight environments and	**Application Document 6.17 Chapter 17 Socio-economics** includes an assessment on the likely effects on PRoWs, NCN Routes, and severance caused by road closures. **Application Document 6.18 Chapter 18: Health and Wellbeing** considers the potential health and wellbeing effects associated with changes to PRoWs, the road

UK Health Security Agency Comment	National Grid Response
as such it is important that any changes have a positive long-term impact where possible.	network, recreational routes, and open space, leisure and play opportunities. This includes consideration of potential impacts on both physical and mental health, including opportunities for physical activity. The assessment concludes no significant effects on human health and wellbeing.
The report does not identify how the frequency of use for these routes will be determined. The determination of sensitivity and magnitude must include reference to the usage of each PRoW, bridleway or cycle route. In addition to public authority consultation, usage insights can also be gained through community consultation and site surveys.	Frequency of use is a determinant of sensitivity of PRoWs, access routes, and recreational routes within **Application Document 6.17 Chapter 17 Socio-economics.** Frequency of use of these routes has been determined by desk-based research, including satellite imagery, as well as local authority and national websites. Any National Trails, regional and promoted routes, and National Cycle Network (NCN) routes have been assessed as high sensitivity given that they are likely to be used highly frequently for recreational purposes.
Recommendations	
Local consultation with the community and a site survey of the routes directly affect should indicate likely usage levels. This data should be used to review the allocation of sensitivity, magnitude and final assessment of significance to each of the affected PRoW or cycle networks.	Frequency of use is a determinant of sensitivity of PRoWs, access routes, and recreational routes within **Application Document 6.17 Chapter 17 Socio-economics.** Frequency of use of these routes has been determined by desk-based research, including satellite imagery, as well as local authority and national websites. Any National Trails, regional and promoted routes, and NCN routes have been assessed as high sensitivity given that they are likely to be used highly frequently for recreational purposes.
Traffic and Transport	
The Traffic and Transport Study Area will primarily be based upon ‘Rule 1’ and ‘Rule 2’ of the IEMA Guidelines which can be used to determine the effect of increased traffic volumes on links within the Study Area. The latest version of the IEMA guidelines should be used to form the basis of the assessment.	The latest version of the guidelines has been used to inform the assessment presented in **Application Document 6.14 Chapter 14 Traffic and Transport**.

UK Health Security Agency Comment	National Grid Response
Recommendations	
The traffic and transport assessment should be completed in accordance with the latest IEMA Guidance - Environmental Assessment of Road Traffic and Movement.	The latest version of the guidelines has been used to inform the assessment presented in **Application Document 6.14 Chapter 14 Traffic and Transport**.

1.31 Yorkshire Water

Table 1.30 – Yorkshire Water

Yorkshire Water Comment	National Grid Response
Water Environment Matters relating to the water environment are scoped into the Environmental statement. YW support this. However, Table 10.1 of the EIA Scoping Report, Volume 1, ref: CGNC-NG-CNS-REP-0002 advises sewerage undertakers will not be consulted to agree the scope of the FRA. YW believe this to be an oversight and would request that pre-application discussions are held to ensure that YW critical assets are not adversely affected. Damage to YW assets as part of the construction process can result in pollution and/or flooding to end users. Consequently, proper consideration of the sewer and clean water network as part of the FRA is important. Any pre-application discussions should be supported by detailed route maps of the electricity transmission line.	The Applicant has engaged with Yorkshire Water to collect data about their sewer and clean water networks in order to inform the Projects design and avoid or mitigate any potential for impacts on critical assets. Flood risk from sewers and water mains is also addressed within **Application Document 7.13 Flood Risk Assessment.**
The proposal is not expected to generate any discharge to YW assets. During construction, rainwater and water encountered during excavation, would be addressed by construction of sustainable drainage systems (SuDS). This is acceptable to Yorkshire Water.	National Grid notes this feedback.
Noise and Vibration Noise and Vibration is scoped into the ES. However, vibration impacts to structures has been scoped out of this chapter. YW assets are considered to be vibration sensitive structures. Notably, a steel 1000mm treated live water main crosses the scoping boundary between the settlements of Ellerker and Elloughton. The impact of construction activities on this asset must be taken into consideration. Clean water assets including: 14-inch cast iron water main and a 355mm HPPE water main follow the route of the A164 and must also be taken into consideration.	Potential effects of vibration from the construction of the Project has been assessed and is set out in **Applicating Document 6.16 Chapter 16 Noise and Vibration**.

Yorkshire Water Comment	National Grid Response
Geology and Hydrogeology A small part of the identified scoping boundary passes through the separate SPZ1 areas of both Keldgate and Dunswell Source Protection Zones and the associated SPZ2 and SPZ3 zones for these protection areas. The EIA Scoping report Volume 1, ref: CGNC-NG-CNS-REP-0002 advises that majority of the geology and hydrogeology topic will be scoped out advising significant effects are unlikely with the proposed mitigation and control measures.	No undergrounding is proposed on the proposed overhead line however there would be some undergrounding of third party assets that are crossed by the proposed overhead line. The effects of the trenchless crossings have been assessed and are presented in **Application Document 6.12 Chapter 12 Geology and Hydrogeology** which is supported by **Application Document 6.12.A4 Appendix 12.4 Groundwater Risk Assessment**.
However, some elements of the geology and hydrogeology topic will be scoped in, including trenchless crossings. Trenchless crossing are not currently proposed although any significant effects on the SPZ zones as a result of intrusive ground works will be considered. The ES will also be supported by a CEMP detailing the use and storage of chemical and fuels. The scope of this chapter is acceptable to YW.	
Conclusion Overall, YW agrees with the scope of the EA but requires extension to Chapter 10. Water Environment and Chapter 15. Noise and Vibration as detailed above.	National Grid notes this feedback.

1.32 West Lindsey

Table 1.31 – West Lindsey

The Coal Authority Comment	National Grid Response
Thank you for your letter dated 21st August 2023. This letter forms the response from West Lindsey District Council in its role as the Local Planning Authority. This letter will set out the response of the Local Planning Authority to the EIA Scoping Report which has been submitted. The proposal constitutes both EIA development for the purposes of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and a Nationally Significant Infrastructure Project (NSIP) and is regulated by The Planning Act 2008. This letter will set out the response from the Local Planning Authority based on the chapters in the Scoping Report. The project is entirely outside of the geographic boundary of West Lindsey by up to 3.5 kilometres. Therefore, where the Local Planning Authority has no comments to make, this will be indicated.	National Grid notes this feedback.
Chapter 1 – Introduction There are no comments to make on this section. The introduction sets out the background context and the legislative framework which the proposed development would sit within..	National Grid notes this feedback.
Chapter 2 – Regulatory and Planning Policy Context The national legislative and policy context is generally agreed upon. It is noted that the EIA Scoping Opinion does not reference the most recent iteration of the National Planning Policy Framework (NPPF) (September 2023). This is mostly an administrative requirement as the new NPPF only makes minor alterations to the requirements for renewable energy development (most notably wind) but given the nature of this proposal in supporting the transition to a net zero economy, consideration of the most up to date legislation, policy and guidance is critical especially given the scale of the NSIP. The	The ES has considered the relevant parts of the NPPF, this is set out in **Application Document 6.2 Chapter 2 Legislation and Policy Context** and the relevant sections of the topic chapters, **Application Documents 6.6 to 6.19**. **Application Document 5.5 Planning Statement** and **Application Document 5.6 Policy Compliance Tables** deals with policy compliance.

The Coal Authority Comment	National Grid Response
Scoping Report also completely fails to reference the Energy Security Strategy published in April 2022. Although again, the relevance is limited, a full understanding of the legislative, policy and guidance is critical.	
It is considered that the local policy context is severely lacking in detail. No consideration has been provided to the Central Lincolnshire Local Plan (adopted April 2023) at the outset and is only referenced sporadically throughout the Scoping Report and where it is mentioned, detail is lacking. Although not within the geographic area of West Lindsey, the nature and scale of the proposed development has the potential to have significant environmental effects of a transboundary nature. This is especially the case for impacts from a landscape, visual and heritage perspective. The flat topography and scale of the project means that it has the potential to be visible for several miles and therefore into jurisdiction of the West Lindsey	A regional and local planning policy appendix supports each of the topic chapters **Application Documents 6.6 to 6.19**. **Application Document 5.5 Planning Statement** and **Application Document 5.6 Policy Compliance Tables** deals with policy compliance.
The whole Scoping Report makes two references to Neighbourhood Plans and no specific reference is made to any Neighbourhood Plan in any District/County, let alone specific policy within them. Neighbourhood Plans form part of the statutory development plan within their relevant geographic boundaries and therefore an appropriate level of weight should be afforded to them in the determining of this proposal. A lack of reference to specific policies is consistent throughout the Scoping Report.	Neighbourhood plans have been included where appropriate within the regional and local planning policy appendices that support each of the topic chapters **Application Documents 6.6 to 6.19**. **Application Document 5.5 Planning Statement** and **Application Document 5.6 Policy Compliance Tables** deals with policy compliance.
Chapter 3 – Main Alternatives Considered The approach here is agreed, it is positive to see that an outline of the alternatives considered has been provided at an early stage which is not always the case. It would be expected that a full justification is also set out within the final Environmental Statement (ES).	National Grid notes this feedback.

The Coal Authority Comment	National Grid Response
Chapter 4 & 5 – Description of the Project / EIA Approach & Methodology The general approach to the overall project is considered to generally be acceptable. More clarity on the nature (if any) public consultation will take place would have been preferred. This project and the NSIP process in general are highly technical and interdisciplinary but the scale of the project and the rural context will likely raise questions and/or concerns within many communities who would want to be involved at an early stage. A lot of reference is made to cumulative impacts but it would have been preferable to see this in a standalone chapter.	The cumulative assessments have been provide as stand alone chapters in **Application Document 6.20 Chapter 20 Intra-project Cumulative Effects** and **Application Document 6.21 Chapter 21 Inter-project Cumulative Effects**
Chapters 6 & 7 – Landscape & Visual The scale of this project is very substantial and visual/landscape impacts given the flat topography could potentially impact the landscape character for miles around. Consideration should be given to Policy S53 which relates to design and amenity. It is positive to see that reference has been made to Policy S62. The lack of reference to any National Character Areas within West Lindsey is also of concern. For instance, National Character Area 22 around East Stockswith and Wildsworth comes within 1.5 kilometres of the Scoping Boundary and has been afforded no consideration. No reference appears to have been made to Section 12 of the NPPF relating to design.	National Grid notes this feedback. Significant landscape effects have been identified for a number of landscape character areas and the direct and indirect effects of the Project on character is presented in **Application Document 6.6 Chapter 6 Landscape**. Policy S53: Design and Amenity has been reviewed. This policy is related more to developments within settlements, new buildings in terms of densities, form and materials, and movement including accessibility, connected travel networks, parking and servicing. Although there are some elements on the policy relating to nature which are perhaps more relevant in terms of retention of existing natural features and biodiversity net gain, overall the policy does not appear to be relevant for the type of development proposed in terms of visual amenity. National Character Areas (NCA) were not considered at scoping or PEIR stages, but have been assessed as part of the ES, the assessment presented in **Application Document 6.6.A3 Appendix 6.3 Landscape Baseline and Assessment**. All NCA within the 5 km study area for the landscape assessment have been considered, noting that the study area is smaller than the Scoping Boundary.

The Coal Authority Comment	National Grid Response
	References to the NPPF which was updated in August 2026 is included within **Application Document 6.6 Chapter 6 Landscape** and **Application Document 6.7 Chapter 7 Visual**.
More details should be provided with regard to the potential impact of the proposal on West Lindsey. At present, only one reference is made to scoping Areas of Great Landscape Value around Gainsborough. Whilst this is understood as these are predominantly on the eastern side of Gainsborough, more justification should be provided.	**Application Document 6.6 Chapter 6 Landscape** and **Application Document 6.7 Chapter 7 Visual** report on receptors within the 5 km study area which includes areas within West Lindsey. However, as West Lindsey is to the east of the River Trent and multiple existing overhead lines, the effects of the Project are limited as the landscape and character of views would not fundamentally change.
The approach to the LVIA not referencing National Character Areas (NCAs) and favouring Local Character Areas (LCA) is understood but the purpose of National Character Areas is to provide an overall picture of the character and appearance of an area at a larger scale. Given the nature and scale of the project, the lack of specific consideration to NCAs is concerning and it is the view of the Local Planning Authority that these should be scoped in to the final ES. The LVIA should also scope in the potential impacts (if any) on LCAs within West Lindsey. It is agreed that the Lincolnshire Wolds can be scoped out.	National Character Areas (NCA) were not considered at scoping or PEIR stages, but have been assessed as part of the ES, the assessment presented in **Application Document 6.6.A3 Appendix 6.3 Landscape Baseline and Assessment**. All NCA within the 5 km study area for the landscape assessment have been considered. For the assessment of LCAs, the character assessments for East Riding of Yorkshire, North Lincolnshire and East Midlands have been considered. It is noted that as West Lindsey is to the east of the River Trent and multiple existing overhead lines, the effects of the Project are limited as the landscape and character of views would not fundamentally change.
It is understood that the main focus would be on local/nationally protected landscapes but this should not be at the expense of the overall landscape character. The fact that Chapter 7 makes almost no reference to West Lindsey and no detailed consideration is surprising. The closest extent of the Scoping Boundary is just over 1 kilometre and goes up to being 3 kilometres from the western border of West Lindsey. The introduction to Chapter 7 outlines the following: ‘Based on the type of OHL infrastructure and experience of assessments of 400 kV OHL (the tallest element of the Project), the visibility of individual pylons approximately 50 m tall is assumed to be	All landscape and visual receptors within the 5 km study area for the assessment have been considered, noting that the study area is smaller than the Scoping Boundary which was purposefully large to ensure the baseline of the area was fully understood whilst the alignment of the Project was not finalised.

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a maximum distance of 10 km. Beyond this distance the perceptibility of pylons approximately 50 m tall diminishes considerably in most instances, and in all but the clearest of viewing conditions. At distances greater than 5 km, effects on landscape character and visual amenity are unlikely to be significant. This is because at 5 km distance, when viewed at arm's length, a 50 m tall pylon will appear to be approximately 0.61 cm high in the landscape. If a pylon is seen on the skyline in very clear conditions, or a pair of pylons are seen close together at this distance, perceptibility may increase slightly but this is still unlikely to trigger significant effects. Initial field survey for the Project has also determined that, where visible at distances between 1 km and 3 km, existing pylons are typically noticeable but not prominent. This is because in the rolling well-treed landscapes found north of the Humber Estuary, pylons are often obscured by trees, landform and vegetation, whilst in the flat open landscapes south of the Humber Estuary, the visually permeable nature of the pylon's lattice structure means that they rapidly recede and visually assimilate into the wider landscape.'	
The text is taken from 7.3.2 to 7.3.4. Whilst the impacts are less likely to be significant on West Lindsey than other LPAs directly within the Scoping Boundary, the lack of any consideration is concerning. The first paragraph makes it clear that the study area is up to 10 kilometres and it is only at a distance of greater than 5 kilometres where the impacts are considered to be 'unlikely to be significant'.	At scoping stage, the Scoping Boundary was purposefully large to ensure the baseline of the area was fully understood whilst the alignment of the Project was not finalised. The study area for the landscape and visual assessments presented in **Application Document 6.6 Chapter 6 Landscape** and **Application Document 6.7 Chapter 7 Visual** is 5 km from the alignment of the proposed overhead line which includes limited areas within West Lindsey.
All relevant NCAs/LCAs within West Lindsey should be scoped in to the ES alongside consideration of all relevant development plan policies, including Neighbourhood Plans. This alongside Chapter 9 are the most important considerations to the Local Planning Authority and should be given an appropriate level of consideration.	The assessment of NCA and LCAs is presented in **Application Document 6.6.A3 Appendix 6.3 Landscape Baseline and Assessment**. All NCA within the 5 km study area for the landscape assessment have been considered. For the assessment of LCAs, the

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	character assessments for East Riding of Yorkshire, North Lincolnshire and East Midlands have been considered. Neighbourhood Plans have been considered where these have been adopted and are listed within **Application Document 6.6 Chapter 6 Landscape** and **Application Document 6.7 Chapter 7 Visual**.
Chapter 8 – Ecology & Biodiversity There are no specific comments in this regard. There may important considerations during the construction period but beyond this, given the physical separation distance between the project and West Lindsey, significant environmental effects seem unlikely at a distance of beyond 1 kilometre.	National Grid notes this feedback.
Chapter 9 – Heritage No reference has been made to Policy S57 of the Central Lincolnshire Local Plan. Although the impact on the setting of any designated/non-designated heritage assets within the District is less likely, the Local Planning Authority would at a minimum expect a proportionate assessment of the impact on their setting and significance to be undertaken. there are a number of Grade II Listed Buildings in Torksey, Gainsborough, Wildsworth and East Stockswith, all of which are near the River Trent and should be considered as part of the EIA. Again, a proportionate assessment on their setting and significance would be expected given the significant scale of the project and the potential to introduce a prominent feature on the landscape for at least 80 years. The scale of the project would be the equivalent to a building 10-20 storeys in height.	The route of the proposed overhead line has changed since Scoping. Planning policy relevant to the cultural heritage assessment is presented in **Application Document 6.10.A1 Appendix 10.1 Regional and Local Planning Policy**.
Chapters 10, 11 & 12 – Water Environment / Geology and Hydrogeology / Agriculture and Soils Given the separation distance of the project from West Lindsey, there are no comments to make in this regard.	National Grid notes this feedback.

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Chapter 13 – Traffic and Transport The general approach to measuring risk is generally agreed with. The approach to selecting which development plans/policies to assess is again somewhat confusing. No reference has been made to the Central Lincolnshire Local Plan. The idea that a decline in highway safety has been scoped out given the scale of the project is concerning. The ES should also include details of construction traffic intensity and routing as this could have the potential to cause serious localised issues. The relevant development plan policy in the Central Lincolnshire Local Plan is Policy S47. Although this would only be applicable if construction traffic is to be routed through Central Lincolnshire.	**Application Document 6.14 Chapter 14 Traffic and Transport** presents the predicted construction traffic flows for each of the proposed construction traffic routes and an assesses the effects on the users of those routes. A short section of Primary Access Route PAR 121 A57 - Between A57/Main Street Junction East falls within the West Lindsey district is the only section of construction traffic route within West Lindsey. This PAR was screened out of the assessment in line with the IEMA guidelines (IEMA, 2023).
Chapter 14 – Air Quality It is anticipated that the main impacts would be during the construction period. Full consideration should be given in the ES to any transboundary impacts that result from transport emissions, ground works/disturbance or anything that causes the release of dust and particulate matter into the air. No reference is made to the potential impact (should one exist) on West Lindsey and no policies have been referenced. Transboundary effects should be scoped in to the final ES.	An assessment of the Project on air quality is provided in **Application Document 6.15 Chapter 15 Air Quality**. This includes an assessment of road traffic emissions of those construction traffic routes scoped into the assessment which met the assessment criteria. None of the construction traffic routes which met the criteria are within West Lindsey district.
Chapters 15, 16 & 17 – Noise and Vibration / Socio-economics, Recreation and Tourism / Health and Wellbeing There are generally no comments in this regard. Tourism is a significant element of the economy within West Lindsey contributing over £143 million in 2019. However, apart from the potential exception of the construction period, significant impacts in this regard seem unlikely.	National Grid notes this feedback.
Chapters 18 &19 – Climate Change / Major Accidents & Hazards	National Grid notes this feedback.

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The approach in these chapters is generally agreed. The fact that more consideration has not been given to potential hazards and accidents during the construction period at this stage is somewhat concerning.	Major accidents and hazards have been scoped out of the ES as set out in **Application Document 6.5.A2 Environmental Statement Appendix 5.2 - Scoping Opinion.**
Conclusion This letter forms the basis of the response of the West Lindsey District Council in its role as the Local Planning Authority to the Scoping Report to the aforementioned NSIP proposal for the development of a 400 kilovolt electricity transmission cable from North Humber to High Marnham.	National Grid notes this feedback.

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