

National Grid Electricity Transmission's and National Grid Ventures' commitments when undertaking high-voltage electricity infrastructure works in the UK

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About National Grid

National Grid Group's operations in the UK include: National Grid Electricity Transmission (NGET), which owns the high voltage transmission system in England and Wales; National Grid Electricity Distribution (NGED) (formerly Western Power Distribution), which owns and operates electricity distribution networks in the Midlands, the South West and Wales, and National Grid Ventures (NGV), which owns and operates energy businesses in competitive markets, including sub-sea electricity interconnectors. This Stakeholder, Community and Amenity Policy has been prepared by NGET and NGV and sets out how we will meet certain of our statutory duties. NGED has prepared its own separate statement.

This document describes the ten commitments we have made to the way we carry out electricity transmission and interconnection works in the UK. This includes setting out how we will meet our amenity responsibilities and how we will involve our stakeholders and communities in our work

Introduction

In this document we will explain how we will meet our obligations under Section 38 and Schedule 9 of the Electricity Act 1989. These obligations relate to the preservation of amenity and requires us to regularly review how we manage those duties, including our consultation process.

Preserving amenity forms only part of our wider environmental responsibilities. You can find out more about the environmental considerations not formally covered by Schedule 9 in other National Grid publications¹. These cover topics ranging from our role in countering climate change, information on electric and magnetic fields, pollution control and connecting new and renewable sources of electricity generation alongside demand customers (e.g. Distribution Network Operators).

About National Grid Electricity Transmission

National Grid Electricity Transmission (NGET) is the largest electricity transmission business in the UK, delivering electricity safely, reliably and efficiently to the customers and communities we serve, while working towards a cleaner, greener energy future. NGET has a critical role to play in the acceleration towards a cleaner future and our commitment to decarbonisation of energy networks to reach net zero. Our transmission network in England and Wales covers some 4,500 miles of overhead line, 900 miles of underground cable and over 300 substations and a subsea link between Scotland and England, the Western Link.

About National Grid Ventures

As part of the competitive division of National Grid plc, National Grid Ventures (NGV) operates in the UK and US where it develops and operates energy projects, technologies, and partnerships to make energy cleaner, more secure and more affordable for consumers. NGV operates separately from National Grid's transmission and distribution businesses.

NGV's electricity interconnector assets give the UK access to secure and affordable energy and will play a critical role in tomorrow's cleaner and smarter energy systems building resilience in our energy supply.

NGV currently has six Interconnectors in operation connecting to France (IFA and IFA2), Belgium (Nemo Link), Netherlands (BritNed), Norway (North Sea Link), and Denmark (Viking Link). Each year they provide power to millions of homes.

¹ Responsible Business Charter, 'Our Communities' webpage, our Environmental Action Plan, National Grid's guidance on electric and magnetic fields. **www.nationalgrid.com**.

NGET and NGV's under the Electricity Act

Under the Electricity Act 1989 NGET holds a transmission licence. Under this licence, NGET is required to develop and maintain an efficient, coordinated and economical electricity transmission system and to facilitate competition in the supply and generation of electricity. Under Schedule 9 of the Act NGET is required to consider ways to preserve amenity in England and Wales, and to do what it reasonably can to mitigate the effects of its proposals on amenity.

Under the Electricity Act 1989, NGV's electricity interconnector businesses are required to hold interconnector licences. Under Schedule 9 of the Act, each electricity interconnector licence is required to consider ways to preserve amenity in England and Wales and to do what it reasonably can to mitigate the effects of its proposals on amenity.

Extracts from Schedule 9

Preservation of amenity: England and Wales

Paragraph 1(1)

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

- (a) shall have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and
- (b) shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.

Paragraph 2(1) states a licence holder shall within twelve months from the grant of his licence prepare, and from time to time modify, a statement setting out the manner in which he proposes to perform his duty under paragraph. 1(1) above, including in particular the consultation procedures.



Where this document applies

As highlighted previously this document applies to NGET's electricity transmission activities and NGV's electricity interconnector activities in England and Wales.

Here, we explain our interpretation of some of the terms we use throughout this document.

Amenity: The natural environment including biodiversity and nature (terrestrial and marine) and the loss of or interruption to access to the natural environment, cultural heritage², geographical or physiographical features of special interest, and landscape and visual quality. Our interpretation also includes the impact of our works on communities, such as the effects of noise and disturbance from construction.

Works³: Constructing new transmission and interconnection infrastructure on land and in the sea. This may include overhead lines, underground cables, marine interconnectors, sealing end compounds, substations, converter stations, subsea cables and platforms. It also includes the major refurbishment and dismantling and removal of any of these parts of the system.

Stakeholders: Organisations and individuals who can affect or are affected by our works. We also refer to communities which includes those stakeholders (organisations and individuals, including residents) who have a particular interest in the local area affected by our works.



² Cultural heritage encompasses the full range of the historic environment, including built and archaeological environments.

³ In line with Schedule 9 of the Electricity Act 1989, these works are covered by the statutory scope relevant to electricity transmission which is defined as follows: Relevant proposals" means any proposals (b) for the installation (whether above or below ground) of an electric line; or (c) for the execution of any other works for or in connection with the transmission or supply of electricity."

Engaging stakeholders and communities

Developing, refurbishing and maintaining electricity networks and marine interconnectors can affect the communities through which they pass. The way we manage our relationships and work with these communities and other affected stakeholders is very important to us.

We strive to engage positively with stakeholders and communities. We are committed to involving them in the work we do and recognise the benefits of doing this. We will carefully listen to people, to take their views and opinions into account and respond to them as part of the way we work.

The principles contained in our second commitment (involving stakeholders and communities) provide the framework that will help us to develop and promote a culture of genuine and meaningful stakeholder and community engagement.



Our commitments

Here, we describe the ten commitments we have made to the way we carry out electricity transmission and interconnection works in the UK to provide safe, reliable and affordable electricity transmission networks and interconnector. This includes setting out how we will meet our preservation of amenity responsibilities and how we will involve our stakeholders and communities in our works.

1. Establishing need

1.1 For Electricity Transmission Infrastructure

We will only seek to build electricity lines along new routes both onshore and offshore and associated installations in new locations where:

- a) our existing infrastructure cannot be upgraded (technically or economically) to meet system security standards and regulatory obligations;
- forecasted increases in demand for electricity will not be satisfied by other means;
- c) customer connections are required; or
- d) where an existing electricity transmission line has been identified for replacement.

1.2 For Interconnectors

We will only seek to build new interconnector assets where there is a benefit to the Great Britain (GB) consumer in regard to delivering security of supply, enabling decarbonisation as well as consumer affordability. Existing assets will be refurbished and upgraded where needed to extend their operational life to continue to benefit GB consumers.

2. Involving stakeholders and communities

We will promote genuine and meaningful stakeholder engagement. We will meet and, where appropriate, exceed the statutory requirements for consultation or engagement.

The following principles will help us meet this commitment. We will:

- 2.1 Seek to identify and understand the views and opinions of all the stakeholders and communities affected by our works.
- 2.2 Provide opportunities for engagement early in the process, on consideration of options and alternatives and where there is the greatest scope to influence the design of the works endeavour to enable constructive debate to take place, creating open and two-way communication processes ensure that the benefits, constraints and adverse impacts of proposed works are communicated openly for meaningful stakeholder and community comment and discussion.
- 2.3 Seek to clarify those aspects of the works that cannot be changed, and the reasons why this is the case.
- 2.4 Seek opportunities to minimise the impact of the works where these present themselves.
- 2.5 Utilise best practice methods and efforts in engaging diverse stakeholders and communities, in an inclusive and equitable way proportionate to the scale and impact of the works.
- 2.6 Provide feedback on how views expressed have been considered and the outcomes of any engagement process or activity.

3. Routeing networks and selecting sites

If we need to build new infrastructure, we will seek to avoid the following areas which are nationally or internationally designated, or defined for their landscape, wildlife or cultural significance:

- 3.1 Landscape: National Parks; National Landscapes (formerly Areas of Outstanding Natural Beauty) and National Scenic Areas.
- 3.2 **Cultural Significance:** Heritage Coasts; World Heritage Sites; Listed Buildings, Conservation Areas; Archaeological Sites, Protected Wreck Sites; Sites designated under the protection of Military Remains Act 1986; Registered Battlefields; Scheduled Monuments and Registered Parks and Gardens.
- 3.3 **Wildlife:** Sites of Special Scientific Interest; Irreplaceable habitats (e.g. Ancient Woodland, Peatbogs); Marine Conservation Zones; Highly Protected Marine Areas; Special Protection Areas and Special Areas of Conservation (and candidate sites); Ramsar sites; National Nature Reserves.

4. Minimising the effects of new infrastructure

When we are developing new infrastructure, we will seek to reduce the effect of our work on communities and the environment.

- 4.1 We will also seek to minimise the impacts through developing new infrastructure, during construction, through operation and decommissioning, in areas that are of international or national significance in terms of landscape, cultural or wildlife as well as other sites valued for their amenity, such as listed buildings, conservation areas, areas of archaeological interest, geological or physiographical features of special interest, local wildlife sites, historic parks or gardens and historic battlefields⁴.
- 4.2 We will take into account the significance of these, their settings and other areas through consultation with local planning authorities, marine licensing authorities, statutory consultees and other key stakeholders who have particular interests in these sites.

4.3 We will apply the Holford Rules for routeing of new overhead lines and the Horlock Rules when designing and siting substations.

5. Mitigating adverse effects of works

- 5.1 We will carefully scope and carry out relevant environmental assessments and surveys and report on these when we apply for consent for new works. We will use best practice environmental impact assessment and survey techniques to assess possible effects of our works and identify opportunities for mitigation measures.
- 5.2 In the course of this, we will consult with relevant stakeholders and affected landowners and users of the sea, where works are likely to have an adverse effect on amenity.

6. Applying the mitigation hierarchy

- 6.1 NGET and NGV projects may follow different consenting processes depending on the nature, scale and geography of the works, such as the Nationally Significant Infrastructure Projects (NSIP) regime, Town and Country Planning Act (TCPA) regime, Section 37 Electricity Act regime and Marine Licensing regime.
- The Energy National Policy Statements 6.2 (January 2024) apply to NSIPs but are also a material consideration under the TCPA regime. National Policy Statement EN-1 (Overarching National Policy Statement of Energy) sets out the general principle that new energy development is expected, in line with the mitigation hierarchy, to avoid significant harm to biodiversity and the natural and historic environment, and where significant harm cannot be avoided to consider mitigation of impacts and as a last resort where possible, compensation measures. In Wales, we will consider similar relevant policies in Planning Policy Wales, including the stepwise approach to assessing impacts on habitats and species and the Wales National Marine Plan.

⁴ Historic Parks, Gardens and Battlefields are identified via Historic Environment Records.

- 6.3 For our projects, we will set out clearly how the mitigation hierarchy (avoid, minimise, mitigate) has been applied and followed to reduce the effects of our works. Where significant residual effects are likely, we will carefully document the design process, stating whether reasonable alternatives with fewer impacts were available and, if so, the reasons why they were not taken forward.
- 6.4 Sometimes the measures we take cannot adequately mitigate against loss of amenity and we may take measures to offset the impact of our work in practical and sustainable ways for example providing biodiversity benefits or gains to compensate for losses which we will develop by engaging with relevant stakeholders. Each case will be considered on its own merits.
- 6.5 Examples may include landscaping and planting works, contributing to enhancing biodiversity, heritage or community programmes, adaptation of heritage assets to new uses or improving physical access, highlighting how cultural and heritage assets can deliver wider environmental benefits or other benefits that deliver lasting value to the people and communities affected.

7. Enhancing the environment around our works

7.1 The decline of biodiversity in the UK is well documented and it is important that we manage the land we own in ways that create the most value for us and our stakeholders, and for the wider environment⁵ in which we operate. As we work to maintain and expand our energy networks and interconnector projects, we are making sure that we minimise the impact of our construction projects.

- The biodiversity crisis we find ourselves in makes this even more important. Government has set out goals for improving the environment within a generation and leaving it in a better state than we found it⁶.
- 7.2 In line with the duty on National Grid in the Levelling Up and Regeneration Act 2023, we will work with relevant authorities to as far as possible, further the purpose of nationally designated landscapes including National Parks and National Landscapes (also referred to as Areas of Outstanding Natural Beauty)⁷.
- 7.3 We will comply with our duty under the Environment Act 2021 to conserve and enhance biodiversity we will apply Government requirements for at least 10% Biodiversity Net Gain in England and any future requirement for Marine Net Gain. In Wales, we will accord with requirements on net benefit for biodiversity in line with Planning Policy Wales.
- 7.4 When undertaking works, we will deliver practical measures that can be taken to enhance areas in the vicinity of the works, seeking to engage with local communities for the benefit of the natural and historic environment, in accordance with local strategies and planning policies⁸.

8. Monitoring and learning for the future

8.1 We will monitor, evaluate and review our engagement processes so that we can learn from our experiences and continue to improve in the future. We will carry out periodic reviews of the environmental impact of our works. We will seek the views of our stakeholders and communities so we can gauge the effectiveness of our assessment and any mitigation and enhancement measures.

⁵ Comprising the natural and historical environment, including areas and sites listed under the third commitment of this policy.

⁶ This was set out in the 25 Year Environment Plan (2018) with a first revision named the Environment Improvement Plan published in 2023. The Government have committed to refresh the plan every five years; set into law in the Environment Act 2021.

⁷ For this, we will refer to guidance for relevant authorities on seeking to further the purposes of Protected Landscapes (December 2024) published by the Department for Environment and Rural Affairs.

⁸ NGET will adhere to any future requirements in its RIIO-T3 business plan, once final determination has been made by the regulator.

8.2 We will use the results of these reviews to help us improve our environmental assessments and the way we manage our work. We will utilise digital tools as far as possible to improve how we engage with stakeholders and communities to improve outreach.

9. Reviewing our commitments

- 9.1 We intend to review these commitments at least every five years. As part of this, we will monitor our progress against these commitments. As a company, we are committed to being a responsible business and leaving a positive legacy in the communities we serve.
- 9.2 We will review the relevance of these commitments alongside our Responsible Business Charter (and our Responsible Business Report which details our progress against these commitments and ambitions), and our Environmental Action Plan.

10. Working with others

10.1 We require other organisations working on our behalf to demonstrate these same commitments. We will continue to create an environment where we can share and deliver best practice.



Appendix

Background

The first significant revision to our Schedule 9 Statement was prepared in 2001. The statement and our performance in meeting the commitments were reviewed and modified in 2006.

With the advent of the Planning Act 2008 in February 2010 we incorporated our Schedule 9 statement duty into this policy. In 2016, we provided a revision of the document. This statement is a revision of the 2016 iteration.

Preparing the 2025 revision

This latest version removes references to our former gas transmission business which was sold by National Grid in 2023. In preparing this revised version we consulted statutory bodies, non-government organisations and representatives of other stakeholder groups (see list below).

The list includes bodies that have statutory responsibilities for amenity as referred to in Schedule 9 of the Electricity Act, other non-government organisations concerned with amenity and representatives of other stakeholder groups. We have also drawn on our own experiences of delivering electricity projects through the provisions of the Planning Act 2008, Town and Country Planning Act 1990 and Marine and Coastal Access Act 2009.

Bodies consulted

Cadw, Campaign for National Parks, Campaign for the Protection of Rural England (CPRE), Campaign for the Protection of Rural Wales (CPRW), Energy Networks Association, Environment Agency, Historic England, The Landscapes Institute, Marine Management Organisation, National Parks England, National Parks Wales, National Landscapes Association, Natural England, National Resources Wales (NRW), The Royal Society for the Protection of Birds (RSPB), The Joint Nature Conservation Committee and The Wildlife Trusts.

For more information on National Grid policies and projects please refer to our website https://www.nationalgrid.com

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