

The Great Grid Upgrade

Eastern Green Link 5 (EGL 5)

Preliminary Environmental Information Report

Volume 2

Part 2

Appendix 6.A Biodiversity Scoping Opinion Responses

Document Reference: EGL5-NGET-CONS-XX-RP-YL-025

May 2026

nationalgrid

Contents

6.A. Biodiversity EIA Scoping Responses 1

Table 6.A-1 Summary of Environmental Impact Assessment (EIA) Scoping Opinion Responses for Biodiversity	1
---	---

6.A. Biodiversity EIA Scoping Responses

Table 6.A-1 Summary of Environmental Impact Assessment (EIA) Scoping Opinion Responses for Biodiversity

Consultee	Consideration	How addressed in this PEIR
Planning Inspectorate and Natural England (PINS ID 2.1.23).	<p>The Planning Inspectorate raised that Natural England request the Applicant consider the tentative East Coast Flyway World Heritage Site (WHS) in the ES due to the location of the Proposed Development.</p> <p>The ES should set out the status of this potential receptor at the point of DCO application. Where significant effects are likely to occur to the receptor beyond those assessed for the individual international and national nature conservation site designations, the ES should provide an assessment and identify mitigation as needed.</p>	<p>The Applicant's biodiversity specialists will review the status of East Coast Flyway WHS at the point of DCO application.</p> <p>If WHS status has been granted by the point of application, an assessment of impacts will be included in the ES.</p> <p>If WHS status has not been granted by the point of application, it will be excluded from the assessment. It is however expected that potential impacts to habitats and species that would be associated with the East Coast Flyway WHS would be captured by the assessment of impacts to established designated conservation sites. This is because the extents of established designated conservation sites cover the majority of the tentative WHS.</p>
Planning Inspectorate and Lincolnshire County Council (PINS ID 3.1.1).	<p>The Scoping Report proposed to scope out impacts to natterjack toad at all stages because the nearest records for natterjack toad are approximately 8.3 km from the proposed development site and that there is no suitable breeding habitat within the proposed development site.</p> <p>The Planning Inspectorate raised that Lincolnshire County Council considers the species to be expanding its distribution into more inland areas and that further information on the species' current distribution is obtained from local Natural</p>	<p>The Applicant's biodiversity specialists have discussed the distribution of Natterjack toad with the local Natural England and Lincolnshire Wildlife Trust officers who manage the Saltfleetby Theddlethorpe Dunes NNR (see Table 6-3 in Volume 2, Part 2, Chapter 6: Biodiversity). These discussions concluded that habitat severance between the species' current distribution and a lack of suitable habitat within the draft Order Limits means there will be no impacts on natterjack toad (for further details see Table 6-5 in Volume 2, Part 2, Chapter 6: Biodiversity of the PEIR). The ES will include a summary of the discussions between the</p>

Consultee	Consideration	How addressed in this PEIR
	<p>England and Lincolnshire Wildlife Trust officers who manage the Saltfleetby Theddlethorpe Dunes NNR. The Planning Inspectorate is not in a position to agree to scope out impacts to Natterjack toad from the assessment unless there is evidence demonstrating clear agreement with Natural England and Lincolnshire County Council that impacts to this species from the proposed development are unlikely. The ES should include an assessment of these matters or the information referred to as a means of demonstrating agreement with the relevant consultation bodies and the absence of a LSE.</p>	<p>Applicant, Natural England and Lincolnshire County Council and the conclusion that there will be an absence of a LSE because impacts are unlikely to occur for natterjack toad or their supporting habitats.</p>
<p>Planning Inspectorate (PINS ID 3.1.2).</p>	<p>The Scoping Report proposed that air quality effects on Greater Wash Special Protection Area (SPA) should be scoped out at all stages. This is because although the SPA overlaps with the study area, it does not contain sensitive habitats and tidal flushing removes deposited pollutants and dilutes them, and as such no impacts are anticipated.</p> <p>The Planning Inspectorate agrees that air quality effects on the Greater Wash SPA is unlikely to lead to significant effects and therefore may be scoped out of further assessment.</p>	<p>The Applicant acknowledges the agreement of this element of the assessment, which has been scoped out of this PEIR.</p>
<p>Planning Inspectorate (PINS ID 3.1.3).</p>	<p>The Scoping Report proposed that maintenance activity impacts during operation (from lighting, noise, dust, pollutants, and vehicle collisions) can be scoped out.</p> <p>The Planning Inspectorate agrees that the proposed maintenance activities are likely to be temporary,</p>	<p>The Applicant acknowledges the agreement of this element of the assessment, which has been scoped out of this PEIR.</p>

Consultee	Consideration	How addressed in this PEIR
Planning Inspectorate (PINS ID 3.1.4).	<p>short-term, and localised and are therefore not likely to lead to significant effects and may be scoped out of further assessment.</p> <p>The Scoping Report proposed that impacts from increased nitrogen deposition / ammonia from operational / maintenance traffic can be scoped out. The Planning Inspectorate agrees that the vehicle trips during operation / maintenance are below screening criteria and therefore significant effects are not likely. Provided that the impacts from increased nitrogen deposition / ammonia from operational / maintenance traffic are confirmed in the ES, this matter may be scoped out of further assessment.</p>	The Applicant acknowledges the agreement of this element of the assessment, which has been scoped out of this PEIR.
Planning Inspectorate (PINS ID 3.1.5).	<p>The Planning Inspectorate raised that public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Planning Inspectorate and may be made available subject to request.</p>	The Applicant agrees that confidential annexes to the ES should be produced and referenced where appropriate in the ES biodiversity chapter for badgers, rare birds and rare plants.

Consultee	Consideration	How addressed in this PEIR
<p>Planning Inspectorate and Natural England (PINS ID 3.1.6).</p>	<p>The Planning Inspectorate raised that the ES should assess potential impacts from specific construction methods such as damage to terrestrial habitats from bentonite breakout when trenchless methods are used for cable installation.</p> <p>Natural England recognised that at the scoping stage there was limited information on specific project design and construction methods.</p> <p>Nonetheless, the list of potential impacts on biodiversity during construction needs to be expanded to consider the construction methods that will be used. The ES should identify a list of receptors assessed for each potential impact and justify any receptors that are scoped out for specific effects.</p>	<p>Potential impacts from trenchless cable installation and the risks of bentonite breakout have been included within Section 6.7 and Table 6-8 of Volume 2, Part 2, Chapter 6: Biodiversity of this PEIR.</p>
<p>Planning Inspectorate and Environment Agency (PINS ID 3.1.7).</p>	<p>Both consultees raised that the Humber Estuary Special Area of Conservation (SAC) was not included within the Scoping Report despite sharing similar boundaries as the Humber Estuary SPA and Ramsar and being located within 10 km of the proposed development. The ES should assess potential impacts to the Humber Estuary SAC where significant effects are likely to occur.</p>	<p>The Humber Estuary SAC boundary does not extend as far south as that of the Humber Estuary SPA and Ramsar site boundary and as such is more than 10 km from the draft Order Limits. There is hydrological connectivity between the draft Order Limits and the Humber Estuary SAC meaning that potential impacts to the site will need to be considered in the screening for the Habitat Regulations Assessment, which considers a wider study area. Due to the designating species and habitats being linked to the marine and coastal environment the impact assessment for this site will be considered as part of in the English Offshore Scheme within Volume 1, Part 3, Chapters 17 to 20 of this PEIR.</p>

Consultee	Consideration	How addressed in this PEIR
Planning Inspectorate (PINS ID 3.3.4).	The Planning Inspectorate raised that impacts from nighttime lighting throughout the cable route corridor during construction on biodiversity and landscape receptors should be scoped in.	The Scoping Report's list of relevant potential biodiversity impact pathways included impacts from artificial lighting during site clearance and construction. This PEIR continues to consider the potential impacts to biodiversity from nighttime lighting during construction and operation.
Planning Inspectorate (PINS ID 3.9.8).	The Planning Inspectorate raised that the Air Pollution Information Source (APIS) could be used as a data source to identify the sensitivity of habitats and features of designated sites.	The Applicant's biodiversity and air quality specialists will ensure that relevant data from APIS has been used when scoping potential impacts from changes in air quality on habitats and features of designated sites.
Natural England and Lincolnshire County Council.	<p>Both consultees have raised that 24 months of bird survey data is considered standard practice and that the Scoping Report stated a single year of data collection would be completed.</p> <p>Lincolnshire County Council raised that more than one year of data collection would be required to ensure that results are not skewed by any particularly harsh weather patterns.</p> <p>Natural England suggest that additional surveys beyond one year may be needed if the route, once defined, is close enough to potentially impact designated sites which support notable bird populations. These potential impacts should consider populations at the Humber Estuary SPA, SSSI populations in the eastern end of the project, and SPA / Ramsar functionally linked land (FLL).</p>	<p>The Applicant's proposed intertidal bird surveys will ensure that 24 months of bird survey data will be collected at Anderby Creek, using a combination of existing data from EGL 3 and EGL 4 Projects, and additional surveys as part of the English Onshore Scheme.</p> <p>The Applicant's proposed terrestrial bird surveys will cover a minimum of 12 months and be supplemented by data collected for the Grimsby to Walpole Project. The Applicant acknowledges that additional terrestrial bird surveys may be required to assess impacts on notable bird population potentially associated with designated sites, including SPA / Ramsar FLL.</p>

Consultee	Consideration	How addressed in this PEIR
Natural England	<p>Potential impacts to designated site populations should be considerate of the species they support and importance of the timing, duration and distance over which disturbance can occur for those species (e.g., golden plover, red-throated diver and curlew).</p>	<p>The Applicant acknowledges that Natural England consider a commitment to trenchless installation such as HDD at the Anderby Creek Landfall to be central to ensuring biodiversity impacts are assessed appropriately. The scheme description provided in Volume 1, Part 1, Chapter 4: Description of the Project details that trenchless installation such as HDD will be used at the Anderby Creek Landfall and as such this construction method has been included as part of the worst-case scenario.</p>
Natural England	<p>Natural England raised that the duration of impact should also consider typical lifespans of species affected, e.g., golden plover typically live for four years, where five years of ‘temporary’ impact could represent a permanent impact for a proportion of those populations.</p>	<p>The assessment of impacts in the ES will consider the typical lifespans of species affected. A five-year construction schedule is included within this PEIR as a reasonable worst-case scenario however it is anticipated that the construction will be phased over that five-year period and each individual section of construction will be far less than five years.</p>
Natural England	<p>Natural England notes that HDD is to be considered where the onshore cable route would need to cross environmentally sensitive features. Natural England acknowledges the potential benefits over the open trenched approach for avoiding potential impacts to environmentally sensitive features. However, trenchless techniques carry their own risks such as bentonite breakout and sink holes. If environmentally</p>	<p>Potential impacts from trenchless installation such as HDD and the risks of bentonite breakout and sink holes have been included within Section 6.7 and Table 6-8 in Volume 2, Part 2, Chapter 6: Biodiversity of the PEIR</p>

Consultee	Consideration	How addressed in this PEIR
Natural England	sensitive features cannot be avoided by route design, Natural England advise that only trenchless options which have been rigorously demonstrated to be technically feasible should be progressed.	The Applicant acknowledges that the severance of habitat networks arising from the project and the potential impact on species populations should be assessed. This potential impact pathway has been included within Section 6.7 and Table 6-8 Volume 2, Part 2, Chapter 6: Biodiversity of the PEIR.
Natural England and Lincolnshire County Council	Both consultees raised that potential impacts to internationally, nationally, regionally and locally important ecological sites will need to be identified and analysed in the PEIR with associated avoidance and mitigation measures presented.	The PEIR provides an assessment of potential impacts to internationally, nationally and locally important ecological sites in Section 6.7 in Volume 2, Part 2, Chapter 6: Biodiversity of the PEIR. For international sites this is based on the Habitats Regulations Assessment (HRA) screening. For national and local sites, potential impact pathways have been identified in Table 6-8 and analysis of any potential effects provided in Section 6.10 in Volume 2, Part 2, Chapter 6: Biodiversity of the PEIR.
Natural England	Natural England raised that the Scoping Report only identified the international designated sites within 10 km of the English Onshore Scheme Scoping Boundary. Natural England advises the Applicant should consider whether this is sufficient to understand the effects of landfall construction / operation on the structure, function and supporting processes of each designated site. Natural England advises the Applicant should continue to consider international designated sites (particularly Gibraltar Point Dunes and potentially The Wash and North Norfolk Coast SAC)	The Applicant acknowledges that the potential impacts from landfall construction and operations on coastal processes which support the function of internationally designated sites should be considered. The draft Order Limits for the English Onshore Scheme extends to the MLWS. Beyond the risk of bentonite breakout on terrestrial and intertidal habitats, there are no impacts anticipated between the trenchless installation HDD starting location inland of the Mean High Water Springs (MHWS) and the trenchless installation HDD exit point below the MLWS. Potential impacts to coastal and marine internationally designated sites which are seaward of the MLWS will therefore be considered as part

Consultee	Consideration	How addressed in this PEIR
	<p>and possible changes to coastal processes as the project design is finalised and the cable installation / construction methods are confirmed. This should be informed by available baseline data.</p>	<p>of the English Offshore Scheme within Volume 1, Part 3, Chapters 17 to 20 in the English Offshore Scheme PEIR. The English Onshore Scheme PEIR does however consider internationally designated sites which are hydrologically connected to the draft Order Limits via watercourses as well as terrestrial habitats within internationally designated sites within 10 km of the draft Order Limits and / or terrestrial habitats which could be part of their FLL. This PEIR continues to use this study area as it is sufficient for identifying those internationally designated sites which need to be considered given the potential magnitude, extent and type of impacts that could arise given the development proposed for the English Onshore Scheme.</p>
Natural England	<p>Natural England raised that potential impacts to designated sites from temporary and permanent habitat loss, noise and visual disturbance, and air and water quality / hydrological changes arising from the proposals should be considered in the ES and HRA screening. The HRA screening should include impacts to habitats within international sites important for ecology (e.g., Greater Wash SPA and the nearby The Wash SPA / Ramsar site, Gibraltar Point SPA / Ramsar site and Humber Estuary SPA / Ramsar site) as well as FLL outside the designated site boundaries which may be used and relied on by SPA / Ramsar birds for foraging habitat and roosts. The same analysis of potential impact pathways should be applied to SSSI's, NNR, regional and local ecological sites and reported in the ES.</p>	<p>The Applicant acknowledges that the impact of temporary and permanent habitat loss, noise and visual disturbance, and air and water quality / hydrological changes on habitats within designated sites but also on FLL needs considering. These potential impacts have been included within Table 6-8 in Volume 2, Part 2, Chapter 6: Biodiversity of the PEIR and within the HRA screening (where appropriate).</p>

Consultee	Consideration	How addressed in this PEIR
Natural England	Natural England raised that construction traffic within 200 m of designated sites need to be assessed for air quality impacts during construction phase. This is because ammonia emissions from road traffic could make a significant difference to nitrogen deposition close to roads.	The Applicant acknowledges this consideration and will include the recommended Zone of Influence (Zoi) within the potential impact pathways within Section 6.7 and Table 6-8 of in Volume 2, Part 2, Chapter 6: Biodiversity of the PEIR and within the HRA screening (where appropriate).
Natural England	Natural England raised that hydrological connectivity between landfall, cable route and designated sites should be considered as it could present a potential pathway for impacts on biodiversity to arise during construction and operation.	The Applicant acknowledges this consideration and will include it within the potential impact pathways within Section 6.7 and Table 6-8 in Volume 2, Part 2, Chapter 6: Biodiversity of the PEIR and within the HRA screening (where appropriate).
Natural England	Natural England raised that the use of the EIA matrix is proposed to align with the EIA process on other projects, but flagged that if a range is used, the higher ranged should be assessed to ensure that impacts are not screened out in order to align with the principles of the Rochdale Envelope.	The assessment methodology proposed for the Biodiversity chapter deviates from the standardised EIA process of matrices, however, aligns with the standard industry guidance as outline in CIEEM EclA guidelines (Ref 6.1) to ensure a robust assessment.
Environment Agency	The Environment Agency agreed that the use of temporary bridges is preferential to culverts. Furthermore, they raised that that in the event that culverts are required, box culverts are preferred over pipe culverts.	The Applicant acknowledges that temporary bridges will be preferred over culverts and that if culverts are required that these should be box culverts. This PEIR has assessed that temporary bridges and box culverts will be used in locations where their methods have been defined in the draft crossing schedule. This assessment focuses on Environment Agency maintained main rivers and not ordinary watercourses. In locations where a construction method for watercourse crossings has not been defined this PEIR assumes a worst-case scenario of a pipe culvert being used. The crossing schedule will be updated as the design progresses and finalised for use in assessment of impacts on ecological features within the ES.

Consultee	Consideration	How addressed in this PEIR
Environment Agency	The Environment Agency raised that non-native aquatic species are not mentioned in the Scoping Report despite non-native plant species being mentioned. The detailed ecological surveys should include methods for identifying non-native aquatic species and biosecurity action plans should consider these species.	The Applicant acknowledges that surveys methods to detect non-native aquatic species will be included in the ecological surveys that inform the ES (see Table 6-11 in Volume 2, Part 2, Chapter 6: Biodiversity of the PEIR). The survey methods will implement biosecurity measures to limit the spread of these species. The need for biosecurity action plans which are relevant to construction and operational activities will be reviewed based on the findings of the surveys.
Environment Agency	The Environment Agency raised that the Scoping Report states that they regulate Main Rivers when they are the regulatory body for Water Framework Directive (WFD) for all inland watercourses including Main Rivers and ordinary watercourses as well as coastal waters within 1 nautical mile of the coast. All inland watercourses and coastal waters within 1 nautical mile of the coast should be considered otherwise the proposed development may breach the WFD. Furthermore, ecology surveys should not be limited to Main Rivers because this could miss impacts on some ordinary watercourses that have a high biodiversity value.	The Applicant acknowledges the Environment Agency's concern and will ensure surveys reflect their regulatory role under the WFD for all inland watercourses and coastal waters within 1 nautical mile. Our The assessment methodology will ensure that all watercourses are considered before exclusion, and aquatic ecology surveys will include ordinary watercourses in addition to Main Rivers to avoid missing potential biodiversity impacts.
Environment Agency	The Environment Agency requests to be included in the consultation process on cumulative effects as it links to the WFD and catchment wide cumulative impacts on watercourses and biodiversity. They also raised that the impact to all inland watercourses needs to be looked at cumulatively and in-combination with other projects.	The Applicant acknowledges the Environment Agency's request to be included in the consultation process on cumulative effects and will ensure that the Environment Agency is engaged throughout the assessment stages, particularly where cumulative and in-combination impacts on inland watercourses and biodiversity are considered. Our methodology will incorporate other relevant projects within the catchment to ensure compliance with the WFD objectives.

Consultee	Consideration	How addressed in this PEIR
Forestry Commission	The Forestry Commission raised that Ancient / veteran trees are irreplaceable habitats. The minimum root protection zone for these trees should be selected as the larger of one of the following numbers: 1) 5 m or 2) 15 times the diameter of the tree in metres.	The Applicant acknowledges and confirms the minimum root protection area in line with standard advice from Natural England and the Forestry Commission (Ref 6.2) as outlined in the Scoping Report.
Forestry Commission	The Forestry commission raised that the proposed development should not result in net deforestation. Furthermore, any woodland mitigation in response to the loss of trees or woodland should have net increase tree canopy cover across the site and occur as either areas which are at least 5 ha in size or which connect up retained woodland to create areas which are at least 5 ha.	The Applicant acknowledges in the event that impacts to trees and woodland cannot be avoided the landscape design produced for the DCO application will seek to apply these recommendations for woodland creation, noting the request that any woodland planting should be a minimum of 5 ha in size, or that connective planting should result in overall woodland blocks being of at least 5 ha. An assessment of this will be provided in the ES when the landscape design has been produced.
Alford Town Council	Alford Town Council raised that there is a conservation woodland and orchard east of Alford which would require detailed ecological survey to inform the ES. This detailed ecological survey would allow impacts to protected species and habitats from the proposed development to be assessed and reported in the ES.	The Applicant acknowledges that detailed ecological surveys for the conservation woodland and orchard east of Alford will be completed and reported in the ES provided the location is within 250 m of the DCO application boundary.
Alford Town Council	Alford Town Council raised that cumulative effects of other nearby National Grid projects should be considered when assessing impacts of habitat fragmentation on protected species populations and wildlife corridors. This assessment should include impacts from lighting, noise and air pollution as well as habitat loss.	The Applicant acknowledges that the cumulative effects of projects on habitat fragmentation should be considered in the ES when more detailed ecological survey data is available.

Bibliography

Ref 6.1 CIEEM (2018, updated 2022). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Second Edition Version 1.2. Chartered Institute of Ecological and Environmental Management, Winchester. Available online at: <https://cieem.net/wp-content/uploads/2018/08/EclA-Guidelines-v1.3-Sept-2024.pdf> [Accessed 14 January 2026]

Ref 6.2 Natural England/Forestry Commission (2022). Ancient woodland, ancient trees and veteran trees: advice for making planning decisions. Available online at: <https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions> [Accessed 24 April 2026]

National Grid plc
National Grid House,
Warwick Technology Park,
Gallows Hill, Warwick.
CV34 6DA United

Registered in England and Wales
No. 4031152
nationalgrid.com