

The Great Grid Upgrade

Weston Marsh S37 4ZM Overhead Line Works

Section 37 Statement

June 2026

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Executive summary

This 4ZM Section 37 Statement provides context to the proposed Section 37 application and responds to the observations raised by the relevant Local Planning Authorities (LPAs) during the Form B consultation process. It explains the need for the Section 37 application, the rationale for the chosen consenting approach, and addresses in detail the matters raised by consultees.

This Statement supports an application made under Section 37 of the Electricity Act 1989 for the installation of 0.9 km of new overhead lines (OHLs), and the removal of sections of existing overhead lines on the 4ZM line ('S37 4ZM Overhead Line Works'). This S37 4ZM Overhead Line Works application also applies for a direction pursuant to section 90(2) of the Town and Country Planning Act 1990 ('Section 90 Direction') for deemed planning permission for these works and for ancillary development, being haul roads, SuDs basins, laydown areas, crossing protection and maintenance access.

Consent is also sought under a separate Section 37 application for installing 0.9km of overhead lines and the removal of existing sections of overhead lines on the 2WS line ('S37 2WS Overhead Line Works'). In this document, 'S37 Overhead Line Works' refers to both the S37 4ZM Overhead Line Works and the S37 2WS Overhead Line Works collectively, unless stated otherwise.

Collectively the S37 Overhead Line Works, and works to deliver the proposed new 400kV Air Insulated Substation (AIS) known as Weston Marsh Substation A ('Substation Works') and modifications to the existing lines that fall under the Overhead Lines (Exemption) (England and Wales) Regulations 2009 ('Exempt Overhead Line Works') are referred to as 'the Scheme'. This upholds the naming convention set out in **Table 1.3** of this Statement.

The Scheme is a standalone project required to connect the Outer Dowsing Offshore Wind DCO ('ODOW'), consented in February 2026, to the National Electricity Transmission System ('the transmissions system') at Weston Marsh Substation A. The S37 4ZM Overhead Line Works are therefore critical to enabling up to 1.5 GW of renewable energy to be delivered by 2030, directly supporting the Government's Clean Power 2030 Action Plan: A new era of clean electricity (April 2025) objectives and legally binding net zero commitments.

Importantly, ODOW DCO's documents establish that its consented Order Limits (see Figure 2 of the accompanying Environmental Assessment Report (EAR)) have been defined to include all land necessary to facilitate a connection to the transmission system in the vicinity of the Spalding Tee-Point. As such, the principle of a connection in this area has been considered and accepted through the DCO process, and the presence of the Order Limits for ODOW should therefore be understood as confirming that a connection at or near the Spalding Tee-Point is approved in principle.

The Scheme is required independently of the Grimsby to Walpole DCO, which is subject to a separate consenting regime, longer delivery programme and cannot meet the 2030 connection requirement.

A robust pre-application process has been undertaken, including targeted statutory consultation with the relevant LPAs via the Form B process. The Form B submission to the LPAs provided a comprehensive and appropriate baseline for that stage of the process and was supported by an Environmental Summary Report. Since that submission, further detailed assessments have

been completed, including a full EAR and supporting technical studies. These address the matters raised during consultation and significantly strengthen this application to the Secretary of State (SoS). In light of this additional information, it is requested that the SoS exercises discretion to re-consult with statutory bodies and the relevant stakeholders to confirm the updated material resolves the concerns previously raised.

SHDC have not objected to the S37 Overhead Line Works via the Form B process. Its accompanying letter addressed to National Grid advises that the SoS should carefully consider the impacts of the development on six listed issues. This Statement has responded to each of these considerations in **Section 2**. Significantly, however, SHDC have not requested a Public Inquiry.

Lincolnshire County Council (LCC) have objected to the S37 Overhead Line Works and have requested a Public Inquiry be held, based on observations regarding the delivery programme and the adequacy of information available at the Form B stage. However, careful review of these objections indicates that they are not substantiated when considered against the full and updated evidence base.

LCC also asserts that the Scheme and the future Grimsby to Walpole DCO must be treated as a single project for the purpose of Environmental Impact Assessment (EIA). NGET does not accept this. The S37 4ZM Overhead Line Works form part of a standalone Scheme that has a distinct and time-critical purpose, i.e. the connection of ODOW by 2030. National Grid submits that it is clear from the relevant case law that the Scheme and the Grimsby to Walpole DCO should not be considered to be part of a single “project” for EIA purposes.

Therefore, the necessity to hold a Public Inquiry should be carefully considered given the observations raised are associated with the programme and the timing of information rather than planning matters. The environmental effects assessment has been comprehensively assessed in this application through the submission of the supporting documentation.

It is concluded that this application for the S37 4ZM Overhead Line Works, to support the urgent need for connecting offshore wind projects to deliver a secure, low-carbon transmission system by 2030, is being sought via the correct consenting regimes and has robustly assessed the potential environmental effects and cumulative impacts in accordance with the relevant legislation and planning policy frameworks.

1. Introduction

1.1 Context and overview

- 1.1.1 This application is made on behalf of National Grid Electricity Transmission plc ('National Grid') to the Secretary of State ('SoS') for the Department of Energy Security and Net Zero (DESNZ) for consent under Section 37 of the Electricity Act 1989 (Ref 1) ('Section 37 application') and a Section 90 Direction for works to install and keep installed up to 0.9 km of 400kV Overhead electricity Lines ('OHLs') and the removal of Overhead Line Works along the existing 4ZM Overhead Line Works ('S37 4ZM Overhead Line Works') in the vicinity of the Spalding Tee-Point, Surfleet Seas End and Moulton Seas End.
- 1.1.2 This application also applies for a direction pursuant to Section 90(2) of the Town and Country Planning Act 1990 ('Section 90 Direction') for deemed planning permission for these works and ancillary development being haul roads and SuDs drainage laydown areas, crossing protection and maintenance access associated with the S37 4ZM Overhead Line Works.
- 1.1.3 The S37 4ZM Overhead Line Works are intended to connect to a proposed new 400kV Air Insulated Substation (AIS), with capacity for 12 bays and associated access and landscaping known as Weston Marsh Substation A. Consent for the substation works are sought from South Holland District Council (SHDC) under the Town and Country Planning Act (TCPA) 1990 (Ref 2).
- 1.1.4 Under a separate Section 37 application consent is also sought for the installation and removal of overhead lines along the adjoining 2WS overhead line route ('S37 2WS Overhead Line Works'). Throughout this Statement reference to the 'S37 Overhead Line Works' should be understood as referring collectively to both the Section 4ZM Overhead Line Works and the S37 2WS Overhead Line Works, unless otherwise stated.
- 1.1.5 The development of the Weston Marsh Substation A (the 'Substation Works'), associated S37 Overhead Line Works and modifications subject to exemptions along the 4ZM line (collectively referred to as 'the Scheme') are required solely to facilitate the connection of Outer Dowsing Offshore Wind DCO ('ODOW') wind farm to the National Electricity Transmission System (NETS) ('the transmission system') by 2030 and which should be noted has been granted development consent from the SoS. An agreement has been made between the National Energy System Operator (NESO) (Ref 3) and ODOW, (and therefore a reciprocal contractual agreement between NESO and National Grid) to secure a grid connection for ODOW in the vicinity of Weston Marsh.
- 1.1.6 The connection of ODOW would support the delivery of the Government's Clean Power 2030 Action Plan: A new era of clean electricity (April 2025) ('Clean Power 2030') (Ref 4) objectives by providing up to 1.5 GW of offshore wind capacity, contributing to the urgent national need to expand generation and secure transmission system connection in time to meet the 2030 clean electricity target.

- 1.1.7 The Grimsby to Walpole DCO also includes the provision of new substation infrastructure at Weston Marsh. However, the works comprising the Scheme are freestanding as they facilitate, and are necessary for the ODOW connection independently of the outcome of the Grimsby to Walpole DCO, and can be delivered and brought into operation entirely separately.
- 1.1.8 This Statement supports the Section 37 application for the S37 4ZM Overhead Line Works and explains how the various elements of the wider scheme are to be brought forward through different but interrelated consenting regimes. It also responds to the observations made by the Local Planning Authorities (LPAs) during the Form B consultation and provides a policy appraisal.

Structure of this statement

- 1.1.9 The remainder of this Statement is structured as follows:
- **Section 2** - Pre-Submission Consultation: summarises the consultation undertaken to date, including engagement led by the relevant LPAs, which has informed their observations and recommendations to the SoS, alongside a response to key objections and an explanation of where such matters can be appropriately addressed through planning conditions.
 - **Section 3** - Need for the Overhead Line Works: outlines the legislative and policy context, explains that the S37 4ZM Overhead Line Works are required to facilitate the construction and operation of the Weston Marsh Substation A and the importance of enabling the ODOW connection by 2030.
 - **Section 4** - Description of the Overhead Line Works: provides a detailed description of the proposed works.
 - **Section 5** - Planning policy appraisal: presents an assessment of the overall planning balance, taking into account the potential environmental effects identified in the accompanying Environmental Assessment Report.
 - **Section 6** - Conclusion: Summarises the conclusions.

Submission documents

- 1.1.10 This document should be read in conjunction with the accompanying documents:

Table 1.1 Supporting Documents

Document Title	Document Reference
Completed Application Form	-
Covering Letter	-
Completed Form B Response from SHDC	-
Completed Form B Response from LCC	-
Environmental Assessment Report	GWNC-ARU-SS50-XXXXXX-RPT-ES-000022
Report to Inform the Screening Decision	GWNC-ARU-SS50-XXXXXX-RPT-ES-000024.

Document Title	Document Reference
Electric and Magnetic Field Assessment	GWNC-NGD-ZZZZ-XXXXXX-RPT-PM-000004
Arboricultural Impact Assessment	GWNC-WSP-SS50-XXXXXX-RPT-ES-000005
Agricultural Land Classification Report	GWNC-ARC-SS50-XXXXXX-RPT-ES-000002
Air Quality Assessment and Screening Assessment	GWNC-WSP-SS50-XXXXXX-RPT-ES-000004
Habitats Regulations Assessment Stage 1 Screening Report	GWNC-ARU-SS50-XXXXXX-RPT-ES-000014
Phase 1 Geo-environmental Desk Study	GWNC-WAA-SS50-XXXXXX-RPT-ES-000001
Historic Environment Desk Based Assessment	GWNC-ARU-SS50-XXXXXX-RPT-ES-000017
Landscape and Visual Appraisal	GWNC-GIL-SS50-XXXXXX-RPT-ES-000001
Landscape and Visual Photomontages	GWNC-GIL-SS50-XXXXXX-VIS-ES-000001
Indicative Landscape and Ecological Mitigation Proposals	GWNC-GIL-SS50-XXXXXX-PLN-ES-000001
Noise and Vibration Assessment	GWNC-ATG-SS50-XXXXXX-RPT-ES-000001
Transport Statement	GWNC-ARU-SS50-XXXXXX-RPT-ES-000018
Flood Risk Assessment	GWNC-WSP-SS50-XXXXXX-RPT-ES-000002
Water Framework Directive (WFD) Assessment	GWNC-WSP-SS50-XXXXXX-RPT-ES-000003
Bat Survey Report	GWNC-ARU-SS50-XXXXXX-RPT-ES-000008
Badger Survey Report (Confidential)	GWNC-ARU-SS50-XXXXXX-RPT-ES-000007
Aquatic Survey Report	GWNC-ARU-SS50-XXXXXX-RPT-ES-000006
Breeding Bird Survey Report	GWNC-ARU-SS50-XXXXXX-RPT-ES-000009
Non-breeding Bird Survey Report	GWNC-ARU-SS50-XXXXXX-RPT-ES-000010
Otter and Water Vole Survey Report	GWNC-ARU-SS50-XXXXXX-RPT-ES-000012
Great Crested Newt Survey Report	GWNC-ARU-SS50-XXXXXX-RPT-ES-000011
Habitat Classification Survey Report	GWNC-ARU-SS50-XXXXXX-RPT-ES-000013
Outline Construction Environmental Management Plan	GWNC-ARU-SS50-XXXXXX-RPT-ES-000019
Outline Construction Traffic Management Plan	GWNC-WSP-ZZZZ-ZZZZZZ-PLN-PM-000002
Cumulative Effects Assessment Report	GWNC-ARU-SS50-XXXXXX-RPT-ES-000020

Table 1.2 Supporting Plans and Figures

Plan Title	Plan Reference
s37 4ZM Application Location Plan	GWNC-LST-4ZM-ZZZZZZ-PLN-EN-000001
s37 4ZM Application Site Plan	GWNC-LST-4ZM-ZZZZZZ-PLN-EN-000002
s37 4ZM Application CDM Plan	GWNC-LST-4ZM-ZZZZZZ-PLN-EN-000003
s37 4ZM Application Overhead Line Works Plan	GWNC-LST- 4ZM-ZZZZZZ-PLN-EN-000004
s37 4ZM Application Pylon Schedule	GWNC-LST- 4ZM-ZZZZZZ-DRW-EN-000001
s37 4ZM Application Illustrative L12 Series Type Pylon Wireframe Drawing Zone of Influence.	GWNC-LST-4ZM-ZZZZZZ-DRW-EN-000002
s37 4ZM Application Illustrative Pylon Foundations Details (Pads & Column and Pile Cap Designs) to Suit L12 Type Pylons.	GWNC-LST-4ZM-ZZZZZZ-DRW-EN-000003
s37 4ZM Application Illustrative Labelled Angles Lattice Pylon	GWNC-LST-4ZM-ZZZZZZ-DRW-EN-000004
s37 4ZM Illustrative Culvert Details for Watercourse Crossings	GWNC-LST- 4ZM-ZZZZZZ-DRW-EN-000005
s37 4ZM Application Illustrative Watercourse Outfall Basin	GWNC-LST-4ZM-ZZZZZZ-DRW-EN-000007
s37 4ZM Application Illustrative Overhead Line Works LoD	GWNC-LST-4ZM-ZZZZZZ-DRW-EN-000008
s37 4ZM Application Illustrative Pylon Working Area	GWNC-LST-4ZM-ZZZZZZ-DRW-EN-000009
s37 4ZM Application Illustrative Conductor Pulling Positions	GWNC-LST-4ZM-ZZZZZZ-DRW-EN-000010
s37 4ZM Application Illustrative Interlocking Trackway Panels	GWNC-LST-4ZM-ZZZZZZ-DRW-EN-000011
s37 4ZM Application Illustrative Scaffold Protection for OHL Conductor Stringing.	GWNC-LST-4ZM-ZZZZZZ-DRW-EN-000013

1.2 Consenting approach

1.2.1 The consenting regimes for the various components of the Scheme are set out in **Table 1.3**. As set out above the totality of these works are required solely for the connection of the already consented ODO. The S37 4ZM Overhead Line Works pursuant to this application for Section 37 Consent are numbered 2, and 4 in the table and shown in the 4ZM CDM Plan (Ref: GWNC-LST-4ZM-ZZZZZZ-PLN-EN-000003).

Table 1.3 Overall Consenting Approach for the Scheme's elements

Ref:	Description of Works	Proposed Consenting Route
1	Construction of the new Air Insulated Substation (AIS) – 400kV Weston Marsh Substation A, associated landscaping and environmental mitigation works, drainage, highways, temporary Public Right of Way (PRoW) diversions and other associated works	Planning permission (pursuant to TCPA) Component referred to as 'the Substation Works'
2	Construction of new sections of overhead line to connect Weston Marsh Substation A into the existing 4ZM overhead line Removal of a section of the existing 4ZM overhead line Other associated works	Section 37 of the Electricity Act 1989 and deemed consent pursuant to section 90(2) of the TCPA Component referred to as 'S37 4ZM Overhead Line Works' *
3	Construction of a new section of overhead line to connect the Weston Marsh Substation A into the existing 2WS overhead line. Removal of a section of the existing 2WS overhead line. Other associated works.	Section 37 of the Electricity Act 1989 and deemed consent pursuant to section 90(2) of the TCPA Component referred to as 'S37 2WS OHL Works' *
4	Sections of haul road, SuDs basins, laydown areas, crossing protection and maintenance access	Section 37 of the Electricity Act 1989, with a direction under Section 90(2) of the Town and country Planning Act 1990 deeming permission to be granted.
5	Modification of overhead lines between 4ZM414 to 4ZM414-N, 4ZM407-N to 4ZM405. Installation and removal of temporary overhead lines between 4ZM410 to 4ZM409-T to 4ZM408; 4ZM408 to 4ZM407-T to 4ZM406. Installation of temporary masts 4ZM409-T and 4ZM407-T. Replace insulators and fittings 4ZM405, 4ZM406, 4ZM410, 4ZM411, 4ZM412, 4ZM413, 4ZM414.	Town and Country Planning (General Permitted Development) (England) Order 2015 (Ref 5) The Overhead Lines (Exemption) (England and Wales) Regulations 2009 (Ref 6) Component referred to as 'Exempt Overhead Line Works'

*S37 Overhead Line Works refers to both the 4ZM OHL Works and the 2WS OHL Works combined

Extent of the Section 37 overhead lines

1.2.2 Section 16 of the Planning Act 2008 Ref 7) provides when an overhead line should be considered a Nationally Significant Infrastructure Project (NSIP) and therefore be applied for under a DCO. There are various scenarios in which Overhead Line Works

are not required to be consented pursuant to a DCO including where the length of the line will be less than 2km. Lines that do not exceed this 2km threshold can be consented via Section 37 of the Electricity Act 1989.

- 1.2.3 This Statement supports the submission of the S37 4ZM Overhead Line Works to install 0.9km of 4ZM line. A separate Section 37 application is being made for the installation of 0.9km of 2WS line (S37 2WS Overhead Line Works). Although two separate Section 37 applications are being made, the overall lengths have been counted together for the purposes of determining the required consenting route and remain below the 2km statutory threshold. Therefore, an application under Section 37 of the Electricity Act 1989 is the appropriate consenting route.
- 1.2.4 The length of line crossing over the 5m buffer of land from the substation's boundary fence is not included in the works sought to be consented by the Section 37. National Grid intend to acquire this land prior to the commencement of works, at which point it will be in the "occupation or control of the person responsible for the installation", in accordance with Section 37(2)(b) of the Electricity Act 1989, and therefore benefit from Permitted Development Rights under Class 15 Part B of the Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO).
- 1.2.5 As part of the works sought to be consented under the Section 37, four new pylons (4ZM414-N, 4ZM413-N, 4ZM408-N and 4ZM407-N) will be erected along the 4ZM line (see 4ZM Site Plan Ref: (Ref: GWNC-LST-4ZM-ZZZZZZ-PLN-EN-000002). The application also includes the dismantling and removal of approximately 730m of overhead line along the 4ZM route between pylons 4ZM414-N and 4ZM407-N, along with the removal of pylons 4ZM408 and 4ZM409. Resulting in a net of two pylons along the 4ZM line.
- 1.2.6 The total length of the S37 Overhead Line Works will not exceed 1.8km. The net increase along both lines is only approximately 240m, with a total net increase of three pylons. Although the new alignment introduces a change in direction, this is a functional requirement of diverting the line into the new Weston Marsh Substation A.
- 1.2.7 Further details of the scope of works are provided in **Section 4 - Description of works** in this Statement.

Deemed approval works

- 1.2.8 Section 90(2) of the TCPA permits that the SoS can direct 'deemed planning permission' for the works which are specified in the application to the extent they constitute development and ancillary works to the Overhead Lines under Section 37 of the Electricity Act 1989 that would otherwise require TCPA planning approval. This allows the automatic deemed planning permission rather than a full application being submitted to the relevant LPA.
- 1.2.9 The deemed approval also applies to the Overhead Line infrastructure itself, including towers, conductors and associated foundations, which form the primary development for which Section 37 consent is sought.
- 1.2.10 Ancillary works are minor or associated works that support or facilitate the main development but are not the primary purpose of the development. They are often included alongside planning permission or sometimes benefit from Permitted Development Rights. Common examples include ancillary roads, drainage works, fencing and boundary treatment and site compounds.

- 1.2.11 In this instance ancillary works for which deemed approval is sought includes three SuDs basins, 1260.75m of haul road, restringing and laydown areas and crossing protections (safety systems (e.g. net guards and support structures) installed at overhead line crossings to catch or contain falling cables and protect traffic, workers, and the public), and maintenance access (See s37 4ZM Application CDM Plan drawing reference GWNC-LST-4ZM-ZZZZZZ-PLN-EN-000003).

Dependence on the delivery of Weston Marsh Substation A

- 1.2.12 An application under the TCPA for full planning permission for the development of a 400kV Air Insulated Substation (AIS) (Weston Marsh Substation A) was submitted to SHDC on 11 May 2026 (application reference number H22-0466-26).
- 1.2.13 The S37 4ZM Overhead Line Works are intrinsically linked to, and contingent upon, the approval of the Substation Works being progressed under the TCPA. The TCPA application incorporates a number of key ancillary elements which are fundamental to the construction, operation and ongoing maintenance of both the substation and the overhead lines' infrastructure.
- 1.2.14 In particular, the TCPA application includes shared infrastructure such as the principal haul road accessed from Stone Gate and the construction compounds (shown greyed out in the 4ZM Site Plan GWNC-LST-4ZM-ZZZZZZ-PLN-EN-000002). These elements are intended to serve all components of the Scheme. Accordingly, these shared works have been assessed and applied for as part of the TCPA application.
- 1.2.15 Three sections of haul road (totalling 1260.75m) branching from the main haul road are required solely for the construction of the 4ZM Overhead Line Works. As these elements do not serve the Substation Works, and they have not been included within consent boundary of the TCPA application. Instead, these sections will be sought under deemed approval as part of this Section 37 application, as illustrated hatched in blue drawing GWNC-LST-4ZM-ZZZZZZ-PLN-EN-000003.

1.3 Relationship with the Grimsby to Walpole DCO

- 1.3.1 The Grimsby to Walpole DCO Project involves over 140 km of new overhead lines and is classed as an NSIP under the Planning Act 2008. A DCO application is currently being prepared with an anticipated submission date of summer 2027.
- 1.3.2 The Weston Marsh Substation A is being included within the Grimsby to Walpole DCO application as associated development. The Grimsby to Walpole DCO will seek to expand Weston Marsh Substation A from that being sought by TCPA approval for the ODO connection, to 20 bays to facilitate the connection of further renewable energy projects.
- 1.3.3 This Section 37 application, together with the other consents identified in **Table 1.3** seeks consent for the necessary infrastructure to facilitate the connection of ODO only to the electricity transmission system by 2030.
- 1.3.4 As set out above, the Grimsby to Walpole DCO application also includes the provision of new substation infrastructure at Weston Marsh Substation A. Whilst the Scheme can form part of the facilities required for the Grimsby to Walpole DCO and is complementary to that project, consents for the Scheme need to be progressed on a standalone basis and are not dependent on the delivery of the Grimsby to

Walpole DCO. The works at Weston Marsh Substation A are freestanding as they facilitate and are necessary for the ODOW DCO connection. Were they to be delivered via the Grimsby to Walpole DCO regime they would not meet the agreement with ODOW to provide connection by 2030. The delivery of the Scheme to connect ODOW would progress, regardless of whether the Grimsby to Walpole DCO is granted or materially delayed.

1.4 Environmental Impact Assessment

EIA Screening Background

- 1.4.1 An Environmental Impact Assessment (EIA) screening request was submitted to SHDC in April 2025 as required for the Substation Works under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (Ref 8). SHDC determined that the relevant works do not constitute EIA development and, therefore, an Environmental Statement was not required. A full planning application for the Substation Works was subsequently submitted to SHDC on 11 May 2026.
- 1.4.2 A separate EIA screening process is required in relation to the S37 4ZM Overhead Line Works given that the Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2017 (EIA Regulations) (Ref 9) are also applicable to the Scheme. The Scheme does not constitute Schedule 1 development but falls within the scope of Schedule 2 and therefore requires a screening decision from the SoS.
- 1.4.3 A Report to Inform the Screening Decision accompanies this application and supports the request for a screening opinion from the SoS for the OHL Works. This considers the likely effects of the Scheme in its entirety, including those specifically associated with the S37 OHL Works components of the Scheme.
- 1.4.4 As set out within the Report to Inform the Screening Decision, National Grid has concluded, with reference to the selection criteria for screening Schedule 2 development (set out within Schedule 3 of the EIA Regulations), that the Scheme does not constitute EIA development and that an EIA Report is not required in support of the S37 4ZM Overhead Line Works applications
- 1.4.5 Whilst a full EIA of the S37 4ZM Overhead Line Works has not been undertaken, an EAR has been prepared in support of this application submission. This is supported by a number of stand-alone technical environmental assessments as set out within the EAR. Together, this information is provided to inform the decision-making process and demonstrate how, in developing the proposals, regard has been had to environmental considerations and mitigation. The EAR relates specifically to the S37 4ZM Overhead Line Works and includes those temporary and permanent works required for their construction and operation.

2. Pre-Submission Consultation

2.1 Introduction

2.1.1 Prior to making this S37 4ZM Overhead Line Works application, consultation has been undertaken with the public, SHDC and LCC LPAs, Statutory Bodies and landowners, while informal discussions around the application process have been undertaken with DESNZ as the determining authority.

2.2 Targeted Consultation

2.2.1 A targeted public consultation was undertaken for the Scheme between 18 November and 19 December 2025.

2.2.2 The targeted consultation was designed to seek focused feedback specific to the infrastructure required for the Scheme in the Weston Marsh area. This sought views on the refining of the alignment and design of the Scheme and identifying any local constraints or sensitivities to inform the final design.

2.2.3 The consultation approach defined the standalone requirement of the Scheme and clearly distinguished it from the Grimsby to Walpole DCO. This included webinars for the Scheme only, story boarding and separate sections within the feedback form questions specifically for the Scheme.

2.2.4 At the in-person events this included a separate table of plans, as well as a 3D visualisation tool that allowed attendees to toggle between the Scheme and Grimsby to Walpole DCO. Similarly, on the website, the Scheme had its own section with its own fly-through video.

2.2.5 The targeted consultation process is described in more detail in **Appendix C - Stakeholder Consultation Record**.

2.3 Pre-Submission Consultation with Statutory Bodies

2.3.1 A high level, early-stage opinion was sought from the following statutory bodies in November 2025:

- Environment Agency (EA).
- Natural England (NE).
- Marine Management Organisation (MMO).
- Historic England (HE).

2.3.2 The information provided to the statutory bodies at this time included a Draft Report to Inform a Screening Decision. The purpose of this early consultation was to obtain initial feedback and act as a preliminary exercise to inform the EIA screening process. It also sought to identify whether these bodies considered if the S37 Overhead Line Works were likely to give rise to significant environmental effects based upon the draft Report to Inform the Screening Decision. This feedback has been collated to further inform the accompanying Report to Inform the Screening Decision for this Section 37 application.

2.3.3 A response was received from all consultees; none of whom raised any significant objection to the proposed Section 37 Overhead Line Works or any likely significant environmental effects at that time.

2.3.4 LPAs were not included in this exercise as it sought to target those consultees with specific responsibilities for environmental matters relevant to EIA screening, rather than constituting a broader consultation involving planning authorities.

2.4 Form B Local Authority Consultation

2.4.1 The Form B consultation is the mechanism by which the local authorities can make a recommendation on Section 37 applications to the SoS. A comprehensive Form B submission was prepared and issued to both authorities on 12 March 2026. This included:

- An Environmental Summary Report presenting an initial environmental assessment of the S37 4ZM Overhead Line Works during construction and operation across a range of environmental topics. The assessment indicated that the construction and operation of the S37 4ZM Overhead Line Works would not give rise to any likely significant environmental effects.
- Covering Letter, outlining the background and need for the S37 4ZM Overhead Line Works and a summary of environmental findings.
- Scheme Site Boundary Plan.
- 4ZM Overhead Line Works Boundary Plan.
- Environmental Constraints Plan.

2.4.2 Both SHDC and LCC referred the Form B submissions to their respective planning committees. Completed Form B responses were received from SHDC on 11 May 2026 and from LCC on 15 May 2026.

2.4.3 SHDC have not stated that they raise an objection, instead noting 'very strong and major concerns'. These relate to the link between the Overhead Line Works and the Substation Works and that the former should not be consented before the latter; and the impacts of the development. The issues raised have been fully assessed in the EAR and accompanying technical documents and considered in Section 5 - Planning policy appraisal of this Statement. As such, SHDC has confirmed that they consider that the points raised can be dealt with by the imposition of conditions to secure appropriate mitigation and confirm that they do not require that a Public Inquiry is held.

2.4.4 LCC has raised an objection, have requested that a Public Inquiry be held and that an EIA is required.

2.4.5 The matters raised by both SHDC and LCC in reaching their respective positions are set out and responded to below.

South Holland District Council Consultation

South Holland District Council's Position

- 2.4.6 SHDC consulted with surrounding residents, Weston Parish Council, Moulton Parish Council, Surfleet Parish Council and their internal departments in relation to Environmental Protection, Ecology and Heritage matters.
- 2.4.7 SHDC has not raised an objection but noted concerns in relation to the timing and scope of the Form B submission. This being that it had been submitted in advance of both the submission and determination of the associated TCPA application for the Substation Works. On this basis, SHDC considered the Form B to be, 'premature and requests that the SoS does not determine the Section 37 Consents until (a) the submission of the Weston Marsh Substation A application to the District Council and (b) the determination of the Application'.
- 2.4.8 National Grid recognises the connection between the consents and would accept a conditional approval of the Section 37 application on the basis that the TCPA application be approved first.
- 2.4.9 SHDC's accompanying letter also raised six matters that it considers should be given careful consideration by the SoS as part of the determination process. These matters are set out below. A response has been provided.

- **Loss of best and most versatile agricultural land.**

Response: SHDC has previously considered the loss of Best and Most Versatile (BMV) agricultural land associated with an 8 hectare footprint for the Substation Works through the EIA Screening Opinion process. In doing so, they acknowledged that the Substation Works would give rise to an adverse effect, stating that "*an adverse impact is the loss of approximately 8 hectares of Grade 1 Agricultural Land (BMV Agricultural Land)*". However, their Opinion went on to conclude, having regard to the Schedule 3 criteria of the EIA Regulations, that such effects are "*unlikely to be significant in terms of the criteria outlined*". This position reflects a proportionate assessment of the scale of land affected in the context of a much wider agricultural landscape and confirms that the effect does not meet the threshold for EIA development.

- 2.4.10 The pre-application advice issued by SHDC for the TCPA Application is consistent with this approach. While it identifies the permanent loss of BMV land as a "key issue" and an adverse impact requiring robust justification, it also makes clear that this is a matter to be weighed in the overall planning balance rather than one that would preclude the development altogether.
- 2.4.11 SHDC's pre-application advice was provided in the context of the substation and based on an area 8 hectares. The consideration for this Section 37 Application through the Form B consultation relates to the S37 4ZM Overhead Line Works areas only, i.e. the pylons' footings and limited length of the temporary haul road which are sought in this application, and for which the area is a fraction of that area. The concern raised in the Form B is therefore disproportionate and materially overstates the effect of the works comprised in the Section 37 application (and the related Section 90 direction).

- **Construction impacts upon the local community including the impact of construction traffic and the suitability of Stonegate for construction traffic (noting that the Highway Authority may provide further comments in their response).**

- 2.4.12 **Response:** Approximately 2.6km of temporary haul road accessing the site from Stone Gate is required to support all works associated with the construction of the Scheme (i.e. the Substation Works, Overhead Line Works and the Overhead Line Works modifications that fall under the exemption Regulations). Consent for this is sought under the TCPA application for the Substation Works.
- 2.4.13 Three sub-sections of haul road, totalling 1260.75m in length within the vicinity of the pylons, will be used exclusively for the 4ZM works. (See accompanying plan s37 4ZM Application Site Plan - GWNC-LST-4ZM-ZZZZZZ-PLN-EN-000002. Deemed approval is therefore sought for their inclusion within the scope of the S37 4ZM Overhead Line Works, and should be considered accordingly for the purpose of the Form B.
- 2.4.14 Regardless of this, the haul road route from Stone Gate has been developed in direct response to concerns raised during the targeted consultation regarding construction traffic utilising Marsh Road. After collating these comments, the construction routing strategy sought to divert heavy construction traffic away from more sensitive Marsh Road residential receptors.
- 2.4.15 As part of the TCPA application, highway improvement and localised road widening works are proposed along Stone Gate to facilitate the safe operation of construction traffic. These works are designed to minimise disruption during the construction period and ensure the route functions effectively.
- 2.4.16 While there are residential properties in the vicinity, Stone Gate also serves as access for Flamingo Flowers; a large flower processing/packing centre, and is therefore already characterised by regular use by heavy good vehicles (HGVs). This existing use indicates that the route is of an appropriate standard and character to accommodate construction traffic.
- 2.4.17 The Transport Statement assesses the anticipated increase in traffic during the construction phase and concludes that, with the implementation of mitigation measures secured through the Outline CEMP and CTMP (including routing strategies, traffic management, and control of construction activity), impacts on the local highway network and nearby receptors would not be significant.
- 2.4.18 During the operational phase, the assessment confirms that there would be no unacceptable impacts on identified receptors as a result of traffic movements.
- 2.4.19 The policy compliance of the Section 37 is demonstrated in **Section 5** of this Statement.
- **The cumulative impacts of the Weston Marsh Substation.**
- 2.4.20 **Response:** A comprehensive Cumulative Effects Assessment Report is submitted as part of this application. This has been prepared notwithstanding that a full EIA was not required, following the Screening Opinion issued by SHDC.
- 2.4.21 The assessment considers the potential cumulative effects of the Scheme alongside other relevant committed and planned schemes within the study area, including the Grimsby to Walpole DCO, Meridian and ODOW. Whilst these developments may give rise to individual significant effects, the assessment robustly concludes that the

Scheme does not give rise to any new or materially different significant cumulative effects when considered in combination.

2.4.22 National Grid will seek to engage closely with projects in the wider vicinity, particularly those which interface with the Scheme, to manage appropriate phasing of construction activities and the mitigation measures identified within the CEMP.

2.4.23 Accordingly, the cumulative effects identified do not materially alter the overall planning balance or the conclusions of the assessment.

2.4.24 The Cumulative Effects Assessment Report was not available at the time of the Form B submission to SHDC; however, it has now been completed and forms part of the submitted documentation. It is therefore requested that the SoS affords this assessment appropriate weight in determining the application.

- **The siting of the infrastructure particularly the pylons in relation to residential properties and local businesses.**

2.4.25 **Response:** Overall, there will be a net gain of three new pylons along the 4ZM and 2WS lines. The siting of the proposed pylons and Overhead Line Works has been informed by a routing and siting study, which has taken account of nearby residential properties and businesses, drawing on established good practice including the Holford (Ref 10) and Horlock Rules (Ref 11).

2.4.26 The alignment has been designed, wherever practicable, to remain alongside existing Overhead Line Works routes, thereby limiting effects on previously unaffected areas. The proposed pylons are located, where feasible, in proximity to existing infrastructure that is to be removed, representing a reorganisation rather than the introduction of a new overhead line infrastructure corridor.

2.4.27 While connection points are influenced by the proposed substations, which is as close as possible to the Spalding tee-point, the design has been refined to minimise effects on nearby receptors through careful alignment and micro-siting.

2.4.28 It is acknowledged that some receptors are located nearby; however, these are already located near to existing overhead lines.

2.4.29 The policy compliance of the Section 37 is demonstrated in Section 5 of this Statement.

- **Socio economics both positive and negative in relation to local employment, jobs and investment in the local area.**

2.4.30 **Response:** A Socio-Economic Impact Report has been submitted as part of the TCPA application in relation to the substation works, which considers the wider Scheme and identifies both effects on employment, investment and the local economy.

2.4.31 In respect of this Section 37 application, the proposed works comprise modifications to existing overhead line infrastructure, including the removal and replacement of existing assets, with a limited net increase in pylons. Having regard to the nature and scale of these works, socio-economic effects specific to the Overhead Line Works component have been appropriately scoped out of detailed assessment.

2.4.32 The assessment undertaken for the TCPA application captures the principal socio-economic effects of the Scheme as a whole, including those arising during construction and operation. It is not considered that the S37 4ZM Overhead Line

Works, when assessed in isolation, would give rise to additional or materially different socio-economic effects beyond those already identified.

2.4.33 It is noted that SHDC's comments appear to consider socio-economic effects at the level of the overall Scheme rather than the specific scope of the S37 4ZM Overhead Line Works application. In this regard, the relevant effects have already been assessed through the TCPA submission, and no additional socio-economic impacts are expected to arise in connection with the S37 4ZM Overhead Line Works alone.

2.4.34 Accordingly, it is considered that the socio-economic effects of the S37 4ZM Overhead Line Works have been appropriately assessed, and that no further assessment is required in relation to the Section 37 works.

- **Landowner compensation**

Response: National Grid seeks to secure Voluntary Land Rights ahead of any Compulsory Purchase, payments for the rights associated with any new assets are covered by the published Land Rights Strategy. In addition, Landowners impacted would be entitled to appropriate disturbance compensation as a result of the construction of the works. Compensation is assessed and paid in accordance with the relevant legal framework (Compensation Code), ensuring that affected parties are fairly and properly recompensed for any losses incurred as a result of the Scheme.

- **Mitigation to be secured by planning conditions**

2.4.35 **Response:** SHDC has further recommended that appropriate mitigation measures, such as a SMP, OCEMP, and Landscape and Ecological Management Plan, should be secured through planning conditions. Outline versions of these documents have been prepared to agree in principle with the LPA, and final versions to be secured by way of condition to allow the appointed contractor to incorporate details closer to the point of construction. It is anticipated that each document will address both the Scheme and S37 4ZM Overhead Line Works, thereby ensuring a cohesive approach to mitigation.

2.4.36 SHDC has confirmed in Appendix A of the Form B response that the S37 4ZM Overhead Line Works fall within the scope of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. However, having regard to the criteria set out in Schedule 3 of these Regulations, SHDC considers that the works are not likely to give rise to significant adverse environmental effects and therefore do not constitute EIA Development.

Lincolnshire County Council Consultation

Lincolnshire County Council's Position

2.4.37 Through the Form B consultation process, LCC received consultation responses from Historic England, the Environment Agency (EA), Natural England (NE), Weston Parish Council, Lincolnshire Wildlife Trust (LWT), Reading Agricultural Consultants, Lincolnshire Police and Lincolnshire County Council's ecology, highway, historic places and minerals leads.

2.4.38 LCC's Form B response has considered these consultation responses and sets out their views on the proposed Overhead Line Works. These are summarised in Part 3 of the Form B.

- 2.4.39 A summary of the representations together with National Grid’s response including where additional information has been updated since the Form B submission is provided in **Appendix A** of this Statement.
- 2.4.40 LCC have objected to the Section 37 on two principal grounds relating to delivery programme and the adequacy of the information submitted in support of the Form B.
- 2.4.41 LCC further put forward reasons why they believe the scheme is EIA development based on the assertion that the current EIA approach represents an inappropriate separation of what should be treated as a single project and use of different consenting regimes. LCC have taken the view that the S37 Overhead Line Works should be assessed on a cumulative, project-wide basis as part of the Grimsby to Walpole DCO which constitutes EIA development. Their position is that it is not lawful under EIA Regulations to separate the elements of the Scheme from the Grimsby to Walpole DCO as a whole.
- 2.4.42 In the sections below the sentiments raised by LCC in their Form B response have been addressed two-fold.
- 2.4.43 Firstly, the objections to the development raised in Part Two of the Form B, being the:
- Delivery programme of works.
 - Insufficient information submitted with the Form B.
- 2.4.44 Secondly, their reasons set out in Part 3 as to why an EIA is required, being:
- a) That the works within this Section 37 application together with the associated components of the Scheme should be seen as part of a wider project, which LCC believes is the Grimsby to Walpole DCO;
 - b) To advance the elements of the Scheme to deliver the connection for ODOW ahead of the Grimsby to Walpole DCO compromises the EIA Regulations;
 - c) The individual components of the Scheme (i.e. Section 37 Overhead Line Works, Substation Works and Exempt Overhead Line Works) should not be considered separately;
 - d) The Scheme should be subject to an EIA as it would be if it was assessed as part of the wider Grimsby to Walpole DCO project; and
 - e) When considered with all the other proposed infrastructure in the locality (ODOW, Meridian Solar, Eastern Green 3 and 4 and Western Marsh to East Leicestershire) the cumulative impact of these other projects make the Scheme an EIA development due to the significant cumulative impact on the environment of all of these projects.
- 2.4.45 These matters have been addressed in detail below.

2.5 Response to LCC’s Form B objections

Delivery Programme of Works

- 2.5.1 LCC have raised objection to the delivery of the Scheme ahead of the Grimsby to Walpole DCO on the basis it would cause an unnecessary, prolonged construction period and disruption to the local community. It is considered that commencing the Scheme in line with the programme to achieve connection for ODOW by 2030

extends the overall construction period which could be avoided if the works were delivered within the Grimsby to Walpole DCO's construction period of 2029 to 2033. The reasoning being that ODOW could be connected by 2031 following the Grimsby to Walpole DCO timeframes resulting in a delay of one year. Consequently, LCC's position is that this would reduce the period of disturbance to local communities that would be caused should the Scheme be 'brought forward on an accelerated basis.'

National Grid's response to the objection

- 2.5.2 To reiterate, the Scheme is not being 'brought forward' but is needed as a standalone project for the purpose of the connection of ODOW to the transmission system by 2030. This requirement is not discretionary; it is driven by National Grid's connection agreement with NESO (which also supports national policy) rather than by National Grid's scheduling. Clean Power 2030 mandates rapid decarbonisation, including targets for clean electricity generation to meet national demand and reduce carbon intensity. Within this context, ODOW's 1.5GW output is a significant (3%) contribution toward offshore wind targets, and National Grid has a statutory duty to facilitate and deliver this connection.
- 2.5.3 Any delays to the Scheme would have a material and detrimental impact on the delivery of ODOW. Since 2023, ODOW has structured its engagement with the supply chain and planned construction activities based on the contracted 2030 connection date. Any delay would seriously undermine the wind farm delivery plans and result in increased costs to the consumer.
- 2.5.4 The suggestion that the delivery programme should be delayed by a year (by adopting a construction window within that of the Grimsby to Walpole DCO's construction timeframe of 2029-2033 to achieve connection in 2031) is therefore misconceived. It would represent an unjustified delay to ODOW and would fall outside the national policy and requirements of the Government's Clean Power 2030 Action Plan.
- 2.5.5 The Clean Power 2030 deadline, combined with limited seasonal outage windows requires the Scheme to be delivered within a defined and constrained timeframe to enable the timely connection of ODOW to the transmission system. If the connection is not achieved by 2030, ODOW would be unable to export power as required, resulting in a delay to renewable energy generation and a corresponding shortfall in its contribution to national decarbonisation and energy security objectives.
- 2.5.6 Such a delay would risk non-compliance with national policy objectives set out in the Clean Power 2030 framework, which prioritises the timely delivery of low-carbon infrastructure, as well as broader legislative obligations relating to carbon reduction and net zero targets.
- 2.5.7 LCC's suggestion to delay the programme by a year also fails to recognise the practical constraints and sequencing of works that are required to deliver the Scheme safely and effectively. It misses the key point that the Scheme would be delivered without any reliance on the Grimsby to Walpole DCO, and regardless of whether the Grimsby to Walpole DCO is consented or delayed.
- 2.5.8 The absolute latest construction start date which would still allow for ODOW to be connected to the transmission system by 2030 is early 2028. It is anticipated that the first site access (FSA) will be February 2028. From that point, there is an approximate 25-month window to undertake the Substation Works to the stage at

which it is necessary for outages to be taken on the existing 4ZM and 2WS circuits in order to progress the works.

- 2.5.9 An outage would be required, temporarily shutting down and isolating part of the electricity transmission system to allow safe construction, maintenance, or connection works, essential to enable tie-ins to the existing transmission system. However, due to seasonal electricity demand, these outages need to be planned and can only be undertaken during the lower-demand period between the British Summer Time clock changes, typically April to October. This significantly constrains the available working windows each year.
- 2.5.10 Outages required to facilitate the works must be secured well in advance, often several years ahead, due to the need to plan and coordinate these across the wider electricity transmission network. As a result, the delivery of the Scheme is not only dependent on its own programme but must also align with, and be balanced against, outage requirements across the whole transmission network.
- 2.5.11 The Grimsby to Walpole DCO construction period of 2029-2033 covers delivery of the full 140 km route. This does not mean there will be continuous high-intensity works in the Weston Marsh area throughout this time. The construction of Weston Marsh Substation A, required for the ODOW connection, is expected to be completed ahead of the installation of the additional eight bays included within the wider Grimsby to Walpole DCO scope. As a result, some site construction works will already have been undertaken, helping to reduce the overall construction impact.
- 2.5.12 The anticipated construction programme, based on a late FSA date of February 2028, indicates that the haul road construction and associated earthworks would be undertaken predominantly throughout 2028. This period would represent the peak phase of construction activity, during which the local community would be exposed to the highest levels of traffic movements and associated disruption.
- 2.5.13 Deferring the Scheme's construction programme would introduce a greater degree of temporary overlap with the Grimsby to Walpole DCO works, thereby intensifying cumulative effects. Both developments are expected to utilise Stone Gate for construction access, with the haul road of Weston Marsh Substation B - located at Marsh House Farm - reliant on the existing Stone Gate Road to the south. Generating HGV movements along the same local road network, while groundworks for the haul road associated with Weston Marsh Substation A are ongoing. This coincidence of peak construction phases would effectively increase the construction traffic load on constrained local routes, leading to a material worsening of cumulative impacts on highway capacity, safety, and community amenity.
- 2.5.14 Progressing the Scheme in advance of the Grimsby to Walpole DCO enables a more staggered construction profile, thereby reducing peak traffic generation and minimising cumulative disruption to the local community.
- 2.5.15 In any case, the potential construction impacts on the local residents have been assessed in the accompanying EAR, concluding that construction impacts would not result in significant environmental effects. The construction activities for the Scheme will be controlled through measures set out in the Outline CEMP to minimise disruption and pollution impacts. In addition, construction traffic was originally proposed to access the site via Marsh Road. However, consultation responses highlighted concerns about the potential impacts on adjacent residential properties and local businesses. Consequently, a haul road is proposed from Stone Gate to reroute construction traffic away from these sensitive receptors.

- 2.5.16 In summary, any delay to the programme would not only affect the deliverability of the Scheme itself but would also compromise the ability of ODOW to meet policy and legislative requirements, with wider implications for achieving legally binding climate targets and maintaining security of energy supply.

Lack of sufficient information submitted with the Form B

- 2.5.17 LCC raised an objection that insufficient information has been submitted to allow them to undertake a full and proper assessment; noting they were unable to fully assess the impacts of the development on highways, archaeology, ecology and flood risk. LCC stated that without this information it is not possible to understand the likely environmental impacts of the Section 37 or to determine whether those impacts would be acceptable or could be made acceptable through the use of suitable planning conditions.

National Grid's response to the objection

- 2.5.18 Work to progress the Scheme has been undertaken at a pace to deliver the required 2030 ODOW connection (the need for which is set out in Section 3 and the response to objection i), above), whilst ensuring that the works have been robustly assessed.
- 2.5.19 It is acknowledged that at the time of the Form B submission to LCC on 12 March, not all technical assessments had not been finalised. However, the purpose of the Form B consultation is not for the LPA to determine the application in full, but to inform the SoS's consideration and provide a recommendation. Sufficient information was supplied for this to take place, on the basis greater detail would then be submitted with the full application.
- 2.5.20 National Grid considers that the submission made to LCC constituted a sufficient Form B package, containing all information necessary for LCC to discharge its responsibilities under Parts Two and Three of the Form B. The materials provided, including the Environmental Summary Report, detailed descriptions of the proposed S37 4ZM Overhead Line Works, and supporting information aligned with the Form B checklist, comprising a robust and proportionate evidence base for the consultation stage in the Section 37 process.
- 2.5.21 In line with the published Form B guidance, the role of the LPA is to confirm receipt of the application information, provide planning observations, identify relevant policy and environmental considerations, and, where applicable, offer views on EIA screening.
- 2.5.22 National Grid considers that the information provided with the Form B exceeded what would be required to inform a screening decision and demonstrate that they:
- a) had 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) propose to do what they reasonably can to mitigate any effect which the Scheme would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects, (as required by schedule 9 of the Electricity Act 1989).

- 2.5.23 A comprehensive EAR accompanies this Section 37 application and provides the SoS with an appraisal of the environmental effects of the S37 4ZM Overhead Line Works. This submission is the subsequent stage of the process beyond the Form B consultations. The provision of a full EAR does not negate the adequacy of the information previously provided at the Form B stage, which included an overview of the proposed mitigation measures and initial assessment of the environmental effects to support an informed consultation.
- 2.5.24 Some of the consultation responses from the statutory bodies and stakeholders flagged where the scope of information limited their response. **Appendix A** of this Statement has tabulated the information gaps identified by the consultees and demonstrates how these have been fully addressed within this submission to DESNZ. This includes a review of the original consultees' responses, identifying where gaps were recognised or had not been available at the time and ensuring that additional evidence or information is provided in an appropriate level of detail before the application is submitted.
- 2.5.25 Follow-up calls have also been held with LWT, NE and the EA to review the identified information gaps these bodies identified in their consultation responses to the Form B and confirm that the additional material to be submitted with the application met their expectations and would address their concerns. **Appendix B** of this Statement includes copies of their confirmation.
- 2.5.26 It is therefore considered that the submission to the SoS has been supplemented accordingly, and it is requested that the SoS reconsults with the statutory bodies and stakeholders to request confirmation the supporting documents resolve LCC's objection regarding the submission of insufficient information.
- 2.5.27 On this basis, National Grid consider that this objection arises primarily from the timing of the Form B submission and a misunderstanding of the standalone nature of these works, rather than the potential environmental effects.

2.6 Reasons why LCC consider an EIA is required

The screening approach

- 2.6.1 LCC have raised an objection to the approach taken to EIA screening, and consider the Scheme to form part of Grimsby to Walpole DCO project. LCC state 'For Environmental Impact Assessment (EIA) purposes it is necessary to consider the whole 'project' [project being the Grimsby to Walpole DCO project] not just to separate it into different parts to avoid the need to undertake an EIA by only assessing each component of the 'project' in isolation. It is accepted and expected that the forthcoming Grimsby to Walpole DCO application is EIA development and will be accompanied by an Environmental Statement'. National Grid therefore understands LCC's points to be:
- c) That the works within this Section 37 application (and the Scheme as a whole) should be treated as part of a wider project; it is understood that LCC believe the project is the Grimsby to Walpole DCO.
 - d) To advance the elements of the Scheme to deliver the connection for ODOW ahead of the Grimsby to Walpole DCO compromises the EIA Regulations.

- e) The individual components of the Scheme (i.e. Section 37 Overhead Line Works, Substation Works and Exempt Overhead Line Works) should not be considered separately,
- f) The Scheme should be subject to an EIA as it would be if it was assessed as part of the wider Grimsby to Walpole DCO project,
- g) When considered with all the other proposed infrastructure in the locality (ODOW, Meridian Solar, Eastern Green 3 and 4 and Western Marsh to East Leicestershire) the cumulative impact of these other projects make the Scheme an EIA development due to the significant cumulative impact on the environment of all of these projects.

LCC allege that the works within this Section 37 application (and the Scheme as a whole) should be treated as part of a wider project; it is understood that LCC believe the project is the Grimsby to Walpole DCO;

- 2.6.2 The EIA Regulations implement Directive 2011/92/EU (as amended by Directive 2014/52/EU). Central to the EIA regime is the identification of a "project" which is broadly defined in Article 1 as "the execution of construction works or of other installations or schemes" and "other interventions in the natural surroundings and landscape".
- 2.6.3 Under Regulation 11 of the EIA Regulations it is required that the SoS, with regard to the criteria set out in Schedule 3 of the EIA Regulations, make a screening decision in respect of the development before determining the application. It is important to establish what the project is in order to undertake this screening exercise.
- 2.6.4 The Scheme is a standalone project for the purpose of connecting ODOW. Accordingly, only the components associated with this objective (i.e. the components of the Scheme) are included within the screening boundary.
- 2.6.5 It is clear from the case law that there is still an element of judgment as to what constitutes a "project" and how it properly falls to be assessed. The following authorities are considered by National Grid to be of particular assistance in the present case, providing guidance on how a project should be defined under the EIA Regulations. The relevant facts are summarised below:
 - a) *R (Wingfield) v Canterbury City Council* [2020] JPL 154 ("*Wingfield*")– the case involved a challenge to the grant of planning permission for a mixed-use development on a brownfield site adjacent to a separate residential development. The claimant argued that the two sites should have been treated as a single project for EIA purposes. The sites were in separate ownership, had been promoted separately, and had been the subject of separate planning applications and environmental statements. Lang J dismissed the challenge being satisfied that the two developments were separate and did not constitute a single project. In doing so, she identified a non-exhaustive list of factors relevant to the determination of the scope of a project for EIA purposes – these are considered further below.
 - b) *R (Ashchurch Rural Parish Council) v Tewkesbury Borough Council* [2023] EWCA Civ 101 ("*Ashchurch*")– the Court of Appeal considered a challenge to planning permission for the construction of a bridge over a railway, the purpose of which was to facilitate the delivery of a future residential development. The appeal was held as the court found that the local authority had not properly considered

whether the bridge formed an integral part of a larger project (i.e. the residential development) and so had failed to properly assess the project as required by the EIA Regulations. In finding this, the court endorsed the need to understand what constitutes a project for EIA with reference to the factors set out in Wingfield.

- c) R (Together Against Sizewell C Ltd) v Secretary of State for Energy Security and Net Zero [2024] Env. L.R. 22 ("Sizewell").— the Court of Appeal upheld the Secretary of State's decision to treat the permanent supply of potable water to the proposed Sizewell C nuclear power station as a separate project from the power station itself. Whilst the station could not be licensed to operate without such a supply, the court was satisfied that the Secretary of State had had due regard to the relevant factors leading to its conclusion that the water supply and power station were separate projects.
- d) Raeshaw Farms Ltd v Scottish Ministers (2026) SLT 183 ("Raeshaw")— planning permission was sought for a wind farm for which the grid connection required to export the electricity produced had not been included within the EIA. In contrast to Sizewell, the court was critical of the lack of evaluation by the reporter on whether the wind farm and grid connection constituted a single project. Whilst Raeshaw is a decision of the Scottish courts and is not binding in England and Wales, it is persuasive authority on the application of the same Directive, and the endorsement of the Wingfield factors.

2.6.6 Drawing these authorities together, the scope of an EIA project has been repeatedly held to be an evaluative matter for the judgment of the decision maker. As stated in Wingfield at paragraph 63, "the question as to what constitutes the 'project' for the purposes of the EIA Regulations is a matter of judgment for the competent authority." It is not as simple as the fact that two developments are linked or have cumulative effects automatically requiring that they are assessed as a single project for EIA purposes. A more considered approach is required, one which is best guided by the factors laid out by Lang J in Wingfield as relevant to determining whether two developments (in this instance the Scheme and the Grimsby to Walpole DCO) form a single EIA project.

2.6.7 As noted, the Wingfield factors (as expressly approved in Ashchurch and Raeshaw) include:

- a) common ownership: where the sites of two developments are owned or promoted by the same person, this may indicate that they constitute a single project;
- b) simultaneous determinations: where two applications are considered and determined by the same committee, at the same time, with interdependent reports, this may indicate that they constitute a single project;
- c) functional interdependence: "where one part of a development could not function without another, this may indicate a single project". This test is derived from R(Burridge) v Breckland DC and Greenshoots Energy Ltd [2013] EWCA Civ 228 and is a high one: the most relevant test being whether in the absence of one part, the other could not function at all;
- d) standalone projects: where one development would be pursued independently of another, this may indicate that they are separate projects; and
- e) cumulative effects: that the two developments have cumulative effects is not determinative of them being a single project, the correct response may instead be cumulative assessment

Application of the Wingfield factors to the Scheme

- 2.6.8 Commonality: There is some commonality between the two Scheme and the Grimsby to Walpole DCO as they are to be promoted by NGET, but given that they are both applications relating to electricity infrastructure this is of no real assistance in the context of assessing whether they are part of the same project for EIA purposes:
- 2.6.9 Simultaneous determinations: the Scheme will not be determined simultaneously with the Grimsby to Walpole DCO; they will be submitted separately and considered at a separate point in time - indeed since the Scheme is standalone the DCO does not need to be considered in respect of any determination of it.
- 2.6.10 Functional interdependence: the Scheme will be capable of being an independent, fully functioning standalone development delivered for the sole purpose of connecting ODOW to the transmission system by 2030. This can all be achieved and the Scheme will be capable of being operational irrespective of the subsequent outcome of the proposed Grimsby to Walpole DCO.
- 2.6.11 This functional independence makes the Scheme distinguishable from much of the case law, for example Raeshaw, where a wind farm could not export electricity without a grid connection. It is clear that the Scheme is able to be delivered and operated independently and there is nothing in it which is reliant on any element of the Grimsby to Walpole DCO.
- 2.6.12 Standalone projects: the Scheme is standalone. It is required, and can be justified, on its own merits as a fully functioning substation and grid connection for ODOW.
- 2.6.13 Cumulative effects: *Wingfield* establishes that overlapping environmental effects are relevant but not determinative, because such effects may exist in various circumstances. In such situations once the projects have been determined to be distinct:
- "Under both the EIA Directive and the EIA Regulations 2011, once the scope of the project or development has been identified, an assessment of cumulative effects is all that the law requires." [*Wingfield*, paragraph 72]
- 2.6.14 The cumulative impacts of the Scheme and the Grimsby to Walpole DCO have been assessed in the accompanying Cumulative Impacts Assessment. This is considered to give sufficient information to consider any potential effects on the environment in combination with the Grimsby to Walpole DCO.
- 2.6.15 It is therefore clear that following case law, in particular *Wingfield*, as endorsed by other cases including *Raeshaw*, leads to the conclusion that since the Scheme will deliver a standalone fully functioning substation and connection for ODOW, without reliance upon the Grimsby to Walpole DCO it is not necessary to undertake a EIA of the Grimsby to Walpole DCO and the Scheme in order to determine the applications for the Scheme.

LCC allege that to advance the elements of the Scheme to deliver the connection for ODOW ahead of the Grimsby to Walpole DCO compromises the EIA Regulations

- 2.6.16 As explained, the Scheme is necessary to deliver the ODOW connection ahead of the Grimsby to Walpole DCO. This does not compromise the EIA Regulations which are being applied to the Scheme in its own right through screening.

2.6.17 LCC's position appears to assume that the Scheme and the Grimsby to Walpole DCO comprise a single project for the purposes of the EIA Regulations. However, NGET submits that this reflects a fundamental misunderstanding of how a project should be defined in EIA terms. The Section 37 Overhead Line Works and Substation Works are being promoted as a standalone Scheme under separate statutory consenting regimes and are not intrinsically part of the DCO application. While there may be a functional and geographical parallels between the two, this does not automatically group them into a single project for EIA purposes, as explained above. The EIA Regulations are not compromised.

LCC allege that the individual components of the Scheme (i.e. S37 Overhead Line Works, Substation Works and Exempt Overhead Line Works) should not be considered separately

2.6.18 The individual components of the Scheme are all required to be subject to different consenting approaches (the use of the Town and Country Planning Act 1990 is appropriate in respect of the substation element and section 37 of the Electricity Act 1989 in respect of the Overhead Line Works is required, and indeed provides circumstances for the use of this consent for such works, outside the regime provided by the Planning Act 2008). It is acknowledged by both National Grid as the applicant and the consenting authorities (SHDC as local planning authority and DESNZ as consenting authority in terms of the Section 37 Application) that the elements are linked and dependent on each other; it is anticipated that the consents will be conditional on each other.

2.6.19 The EIA Regulations do not restrict the submission of applications under different regimes but require a project's likely significant effects on the environment are assessed. In terms of EIA screening, this is being undertaken for each consent by considering the whole Scheme in its entirety rather than considering each element in isolation. The EIA screening which was undertaken for the Substation Works considered the context of the Section 37 Overhead Line Works and Exempt Overhead Line Works; the individual components were not carved out of that screening, and the same approach has been used for the information submitted in respect of the Request for a Screening Decision in respect of the Section 37 Works which also looks at the Scheme as a whole. This approach ensured that potential environmental effects were assessed in the context of all associated works proposed to be delivered by the Scheme. This provides for a robust and realistic evaluation of potential significant effects.

2.6.20 It should be noted that SHDC's screening opinion in respect of the TCPA application for the Substation Works was negative.

2.6.21 Therefore, LCC's assertion is rejected as it is not supported by the relevant legislation. It is considered that the National Grid have sought to use the most appropriate consenting regimes for each element of the Scheme and its requirement to be standalone, with the sole purpose of delivering a customer connection need that sits outside of the DCO project timeframes, as set out in detail in the earlier response to objection i) and Section 3 of this Statement

LCC say that the Scheme should be subject to an EIA as it would be if it was assessed as part of the wider Grimsby to Walpole DCO project

- 2.6.22 As established above, the Scheme is a standalone development. The fact of the Grimsby to Walpole DCO is irrelevant to this process. Therefore, the Scheme must be consented with reference to the relevant EIA Regulations.
- 2.6.23 The approach taken to EIA screening for the S37 Overhead Line Works is consistent with the procedural requirements of the EIA Regulations. The S37 4ZM OHL Works do not constitute Schedule 1 development and have therefore been appropriately considered as Schedule 2 development requiring screening. The screening assessment has been undertaken with explicit reference to the criteria set out in Schedule 3 of the Regulations, including the characteristics, location and potential effects of the development.
- 2.6.24 To support the screening process, the accompanying Report to Inform the Screening Decision has been prepared in accordance with Regulation 12 of the EIA Regulations and is supported by a suite of standalone technical environmental assessments. This ensures that the SoS is provided with sufficient, robust information to adopt a reasoned screening direction. The process has also been informed by engagement with statutory environmental bodies, including the Environment Agency, Natural England and Historic England, ensuring that environmental considerations have been appropriately captured at an early stage.

LCC state that when considered with all the other proposed infrastructure in the locality (ODOW, Meridian Solar, Eastern Green 3 and 4 and Western Marsh to East Leicestershire) the cumulative impact of these other projects make the Scheme EIA development due to the significant cumulative impact on the environment of all of these projects

- 2.6.25 The accompanying Report to Inform Screening Decision includes consideration of potential cumulative effects which could result from the Scheme in combination with other existing and/or approved development. This includes Outer Dowsing, Meridian Solar Farm, Eastern Green Link 3 and Eastern Green Link 4, Grimsby to Walpole and Weston Marsh to East Leicestershire Project.
- 2.6.26 Further to the information contained within the Report to Inform the Screening Decision and based upon pre-application advice from SHDC in relation to the Substation Works application, a Cumulative Effects Assessment has also been prepared. This comprehensive assessment has been summarised in the EAR and forms part of the overall submission for each Section 37 application.
- 2.6.27 The Cumulative Effects Assessment has assessed the potential for significant cumulative effects from the Scheme alongside 19 other developments (including those listed above).
- 2.6.28 It is acknowledged that a number of the other developments considered, including Meridian Solar Farm and ODOW, would themselves result in significant environmental effects. However, these effects have previously been fully assessed within the relevant Environmental Statement documentation and considered by the Planning Inspectorate and other consenting authorities.
- 2.6.29 For the purposes of determining whether the Scheme constitutes EIA development, the consideration of the cumulative effects should consider the characteristics of the proposed development and its potential impacts, taking into account cumulation with other existing, and or approved development. As set out within the Cumulative

Effects Assessment, significant cumulative environmental effects as a result of the S37 4ZM Overhead Lines in combination with other committed developments are not expected.

- 2.6.30 Accordingly, the objection that an Environmental Impact Assessment is necessary on the basis of cumulative effects is not supported.

2.7 Pre-submission discussions with DESNZ

- 2.7.1 The Applicant has engaged in regular, informal pre-submission consultation with DESNZ. This engagement has primarily focused on procedural matters, including the application of relevant consenting regimes and the interface between Section 37 application and statutory requirements, rather than the substantive merits of the scheme.

2.8 Landowner Agreements

- 2.8.1 National Grid's preference will always be to secure land rights on a voluntary basis. This will be through a commitment to securing the land and rights required for the Project through voluntary agreement wherever that can reasonably be achieved, and continues to progress discussions with landowners and occupiers as quickly as circumstances allow.
- 2.8.2 To ensure that the land and rights needed for the Project can be assembled within a suitable and predictable timeframe, it is necessary for National Grid to advance a compulsory purchase process alongside the private treaty negotiations. The approach of running the CPO process in parallel with continued engagement is expressly anticipated by paragraph 17 of the CPO Guidance. National Grid will therefore continue to pursue negotiated agreements throughout the CPO process wherever possible.
- 2.8.3 Heads of Terms will be issued to affected Landowners to secure permanent easements for the new overhead line works and extinguish any old agreements. Along the route to be dismantled there are a variation of circumstances and agreements ranging from implied wayleaves to easements. By offering new agreements it ensures the network can be managed efficiently and effectively and protects the long term security of the system as described in National Policy Statement (EN-5).
- 2.8.4 As a whole, the project is estimated to require approximately 20 sets of Heads of Terms. This includes updating existing agreements and new agreements with Landowners. As part of ongoing engagement with Landowners, a copy of the draft project heads of terms were issued to Landowners in April 2026. Landowner specific heads of terms will be issued during summer 2026.

3. Need for the Overhead Line Works

3.1 Moving towards Net-Zero

- 3.1.1 Tackling climate change is the defining challenge of our generation, requiring urgent and sustained action to reduce greenhouse gas emissions. The UK Government has committed, through the Climate Change Act 2008 (as amended) (Ref 12), to achieving net zero emissions by 2050 - a legally binding target that necessitates a rapid and fundamental transition away from fossil fuels towards low-carbon energy sources.
- 3.1.2 Renewable energy, and in particular offshore wind, is central to delivering this transition. Clean Power 2030 identifies offshore wind as central to delivering a secure, low-carbon transmission system by 2030, and sets a capacity target of up to 50 GW. With a generating capacity of 1.5 GW, ODOW would make a material contribution (3%) to this delivery. However, the delivery of this is only possible if it is supported by a modern and resilient electricity transmission system.
- 3.1.3 The electricity transmission system in Great Britain is undergoing unprecedented transformation. The closure of coal-power generators and aging nuclear power stations is fundamentally reshaping the way electricity is produced. At the same time, new renewable generation, particularly offshore wind, is being developed at scale, often in locations geographically distant from traditional centres of demand.
- 3.1.4 This shift has created a growing mismatch between where electricity is generated and where it is consumed. The historic transmission system was designed around large, centralised power stations, whereas the emerging system is characterised by more dispersed, and often remote, sources of generation. As a result, the existing network is no longer sufficient to accommodate the scale and geography of new energy supply.
- 3.1.5 Significant reinforcement and expansion of the transmission system is therefore required. This includes upgrading existing infrastructure, as well as the construction of new substations and connections into the transmission system, to enable the efficient transport of electricity from areas of generation, particularly along the East Coast and in Scotland, to centres of demand across the Midlands, East Anglia, where there are increased power flows from wind farms. Without these upgrades, the connection of new renewable energy projects would be constrained, limiting the UK's ability to decarbonise its transmission system.
- 3.1.6 National Grid is investing significantly in reconfiguring and strengthening the network, particularly in the East of England, to facilitate the energy transition. Where more capacity is required beyond that which the upgrades to existing infrastructure can provide, National Grid needs to construct completely new parts of the network such as new substations.
- 3.1.7 The need for such infrastructure is clearly recognised in UK Government policy and the National Policy Statements (NPSs) for Renewable Energy, which highlight the critical importance of expanding electricity infrastructure to deliver the Government's clean energy objectives. These policies recognise that there are several different types of electricity infrastructure that are needed to deliver the Government's energy

objectives, which includes electricity networks which are needed to connect the output of other types of electricity infrastructure with consumers and each other.

- 3.1.8 In summary, the reinforcement and expansion of the transmission system is not simply supportive of the transition to net zero; it is fundamental to it. Without timely and substantial investment in new and upgraded infrastructure, the UK will be unable to connect the volume of renewable generation required, undermining progress towards its legally binding climate commitments.

3.2 Outer Dowsing Offshore Windfarm (ODOW)

- 3.2.1 The Weston Marsh Substation A is the proposed connection point for ODOW. ODOW is a 1.5GW wind farm comprising 100 turbines and located approximately 54 km from the Lincolnshire Coast. The electricity generated by the wind farm is transmitted to shore via offshore export cables, with a landfall point at Wolla Bank, where it is then carried inland by underground onshore cables to the transmission system's connection point. ODOW is a joint venture developed by Corio (and its affiliates), TotalEnergies and Gulf Energy Development.
- 3.2.2 Upon completion, ODOW is anticipated to generate renewable electricity for over 1.6 million households, significantly contributing to the UK's target of up to 50 GW of renewable energy generation from offshore wind by 2030 to net zero carbon by 2050). The urgent national need for offshore wind generation is established in the Clean Power 2030 Action Plan. Development consent for the ODOW DCO was granted by the SoS on 10 February 2026, making it well-placed, deliverable scheme to contribute to this need.
- 3.2.3 ODOW's DCO includes the above ground connection with a National Grid substation. The ODOW DCO's order limits clearly define the area within which authorised works, including infrastructure connections to the transmission system, may be undertaken. Any connection located within these limits falls within the scope of the approved ODOW scheme and is therefore consented in principle, subject only to compliance with detailed design requirements. In the case of a connection to Weston Marsh Substation A this would fall within the defined ODOW DCO limits and aligns with the approved works, so no separate or additional consent is required for ODOW's connection beyond requirements and implementation controls.
- 3.2.4 Delays to the Scheme would materially affect ODOW's delivery. Since 2023, supply chain engagement and construction planning have been aligned to the 2030 transmissions system, any delay would disrupt delivery and increase consumer costs.
- 3.2.5 Under Section 9(2) of the Electricity Act 1989, National Grid has a duty to develop and maintain an efficient, coordinated, and economical system of electricity transmission; and to facilitate competition in the supply and generation of electricity. This includes a statutory obligation to offer to connect any new generating stations or interconnectors applying to connect to the transmission system.
- 3.2.6 An evaluation of two possible transmission system connection options (the 'Lincolnshire Node' and Weston Marsh) was considered in the ODOW Preliminary Environmental Information (PEI) Report (June 2023) (Ref 13). Following the publication of the PEI Report, ODOW received confirmation from NESO in August 2023 that the confirmed connection for ODOW would be Weston Marsh. As part of

the connection agreement between NESO and ODOW, a connection point onto the transmission network must be made available by 2030.

- 3.2.7 The Substation and S37 Overhead Line Works provide the means by which the connection for ODOW can be achieved by 2030. Delivery of these works is dependent on an adherence to a constrained and fixed programme, including specified outage windows and a targeted first site access in early 2028. Given that the Grimsby to Walpole DCO application is not expected to be submitted until Summer 2027, with construction anticipated between 2029 and 2033, it would not deliver the required infrastructure in time to meet ODOW's connection deadline.
- 3.2.8 National Grid is therefore seeking the standalone delivery of these elements, via separate consents comprising the Scheme as set out in **Section 1** and **Table 1.3**. This would facilitate the installation and commissioning of the electrical infrastructure required to connect ODOW to the electricity transmission system by the agreed connection date of by 2030.
- 3.2.9 Successful consenting outcomes for the Scheme would therefore secure the timely delivery of the ODOW connection regardless of whether the Grimsby to Walpole DCO progresses.
- 3.2.10 The timely delivery of the ODOW connection by 2030 is therefore both critical and crucial. ODOW is an already consented nationally significant renewable energy project, capable of generating up to 1.5 GW of clean energy sufficient to supply over 1.6 million homes and forms an integral part of the UK's pathway to achieving Clean Power 2030's delivery of 50 GW of offshore wind capacity by 2030 and meeting its legally binding 2050 net zero commitments. The works which are the subject of this S37 4ZM Overhead Line Works application are essential to the ability of ODOW to connect its electricity to the transmission system.

3.3 Benefits of the scheme

- 3.3.1 The benefits the overhead line works and other elements of the Scheme are set out below.
- **Net Zero and Clean Energy Benefits:**-ODOW forms part of the key delivery pipeline for achieving both the 2030 Clean Power objective. By delivering low-carbon power at scale, the Scheme will reduce reliance on fossil fuels, enhance energy security and contribute to price stability for consumers. The agreement between ODOW and National Grid is legally binding.
 - **Clean Energy Integration:** The Scheme will assist in ensuring that the supply of energy remains secure, reliable and affordable by providing a connection to the grid for a renewable energy generation project which would provide 1.5 GW of power to the UK energy supply.
 - **Energy Security and Independence:** By providing a connection to the grid for the ODOW project, the Scheme supports the supply of clean, renewable energy from a domestic source, to help reduce the UK's dependence on volatile imported fuels, stabilising energy costs.
 - **Meeting Increased Demand:** By providing a connection to the grid for the ODOW project, the Scheme supports the upgrading of the electricity transmission system to handle a predicted doubling of electricity demand by 2050.

- **Improved Reliability and Modernization:** The Scheme will provide infrastructure with new, more efficient power lines, that will strengthen the overall network and enable a more automated, efficient, and flexible system.
- **Lowering Long-Term Costs:** By providing a connection to the grid for the ODOW project, the Scheme supports the increased use of the sustainable domestic wind energy source and is intended to lead to lower utility bills for consumers and businesses.
- **Economic Growth and Employment:** The Scheme is expected to create 76 (fulltime equivalent) jobs per year on average during the construction phase (2028-2030). Whilst a temporary benefit, the increase in economic activity will result in increased spending in the local economy such as in shops, hotels and amenity facilities, and will support related industries in the supply chain.

3.3.2 This clearly demonstrates a robust and evidenced need for the delivery of the Scheme and supports the justification for consenting the application as a standalone development, enabling timely delivery and facilitating the 2030 ODOW connection.

4. Description of works

4.1 Introduction

- 4.1.1 This section provides a detailed description of the proposed S37 4ZM OHL Works, including deemed approval works. It outlines the nature and extent of the permanent and temporary works, together with those elements seeking deemed planning permission as part of the Section 37 application.

4.2 Site Location

- 4.2.1 The Scheme comprises a standalone set of works capable of being delivered independently of other projects, including the Grimsby to Walpole DCO.

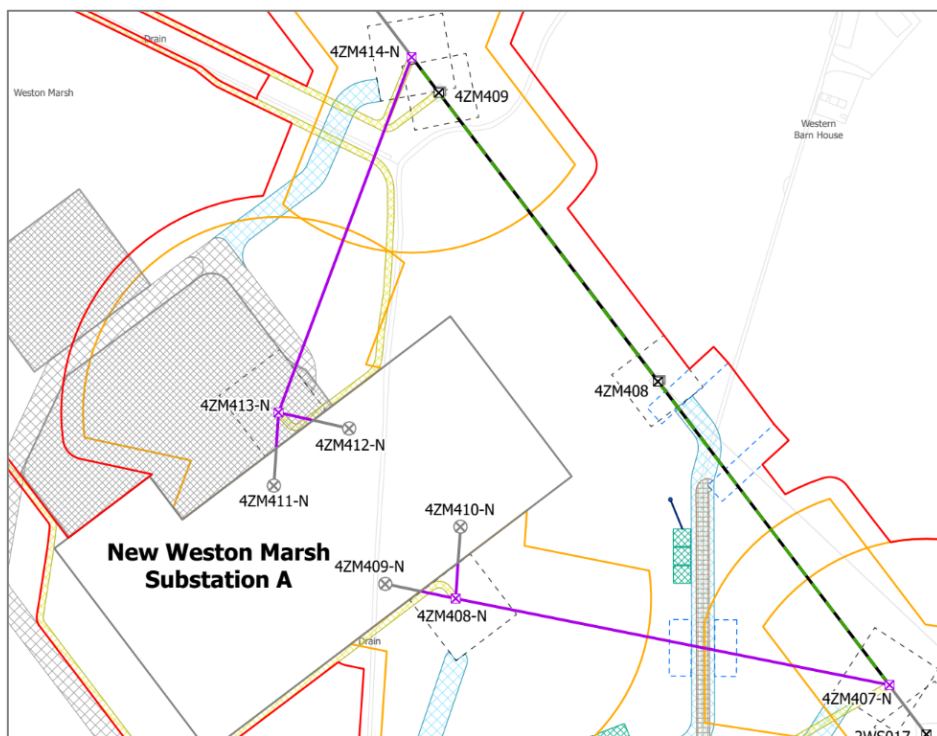
The location of the Scheme has been developed (building on the consideration in the PEI and subsequent confirmation of the location of the transmission system connection as explained in section 3.2) through a multi-phase process undertaken alongside the Grimsby to Walpole DCO project, building upon the Grimsby to Walpole DCO's Corridor Preliminary Routeing and Siting Study (CPRSS) (Ref 14), which identified a preferred siting zone for the area and a general preference for the vicinity of the Spalding tee-point. The Scheme has been developed collaboratively with the wider Grimsby to Walpole DCO to ensure consistency with other infrastructure in Lincolnshire. This led to the appraisal presented in the Weston Marsh Siting Study Report (Ref 15) published as part of the November to December 2025 Weston Marsh targeted consultation, which confirmed the preference for the siting of the new Weston Marsh Substation A in this location.

4.3 Proposed Section 37 overhead line works

4ZM Overhead Line Works

- 4.3.1 The reconfiguration to the existing 4ZM OHL route would turn in to and out of the new Weston Marsh Substation A. This length of new overhead line would not exceed 0.9 km in total, split into two sections of up to 0.5 km and 0.4 km respectively. The first portion would originate from new pylon 4ZM414-N and extend in a broadly southern direction to connect into gantries at the northern façade of the new Weston Marsh Substation A. The second portion would originate from the new Weston Marsh Substation A in a broadly east direction and would tie into the new pylon 4ZM407-N.
- 4.3.2 In addition, a 0.7 km length of the existing 4ZM overhead line route, that currently runs in parallel with the new Weston Marsh Substation A (between 4ZM414-N and 4ZM407-N), would be removed (as shown dashed black and green in the CDM Plan Excerpt below).
- 4.3.3 A portion of the existing 4ZM overhead line would also be reconducted as part of the Scheme (these works do not require consent pursuant to Section. 3 of the Overhead Lines (Exemption) (England and Wales) Regulations 2009).

Image 4.1 Excerpt from s37 4ZM Application CDM Plan (Ref-GWNC-LST-4ZM-ZZZZZZ-PLN-EN-000003)



New pylons

- 4.3.4 The proposed pylons for the Scheme would comprise of steel lattice with three crossarms on either side of a central body.
- 4.3.5 The S37 4ZM Overhead Line Works includes a total of four new pylons and the removal of two pylons, resulting in a net increase of two pylons on the 4ZM overhead line. The maximum pylon height on this line is 64.3m (including 6m LoD).
- 4.3.6 The individual structures are identified in **Table 4.1** below.

Table 4.1 Proposed structures – added, removed, and temporary

Structure number	Structure type	Structure status
4ZM414-N	Pylon - tension	New
4ZM413-N	Pylon - terminal	New
4ZM408-N	Pylon - terminal	New
4ZM407-N	Pylon - tension	New
4ZM408	Pylon - suspension	Existing - Removed
4ZM409	Pylon - suspension	Existing - Removed

Image 4.2 Typical suspension pylon (left) and typical tension pylon (right)

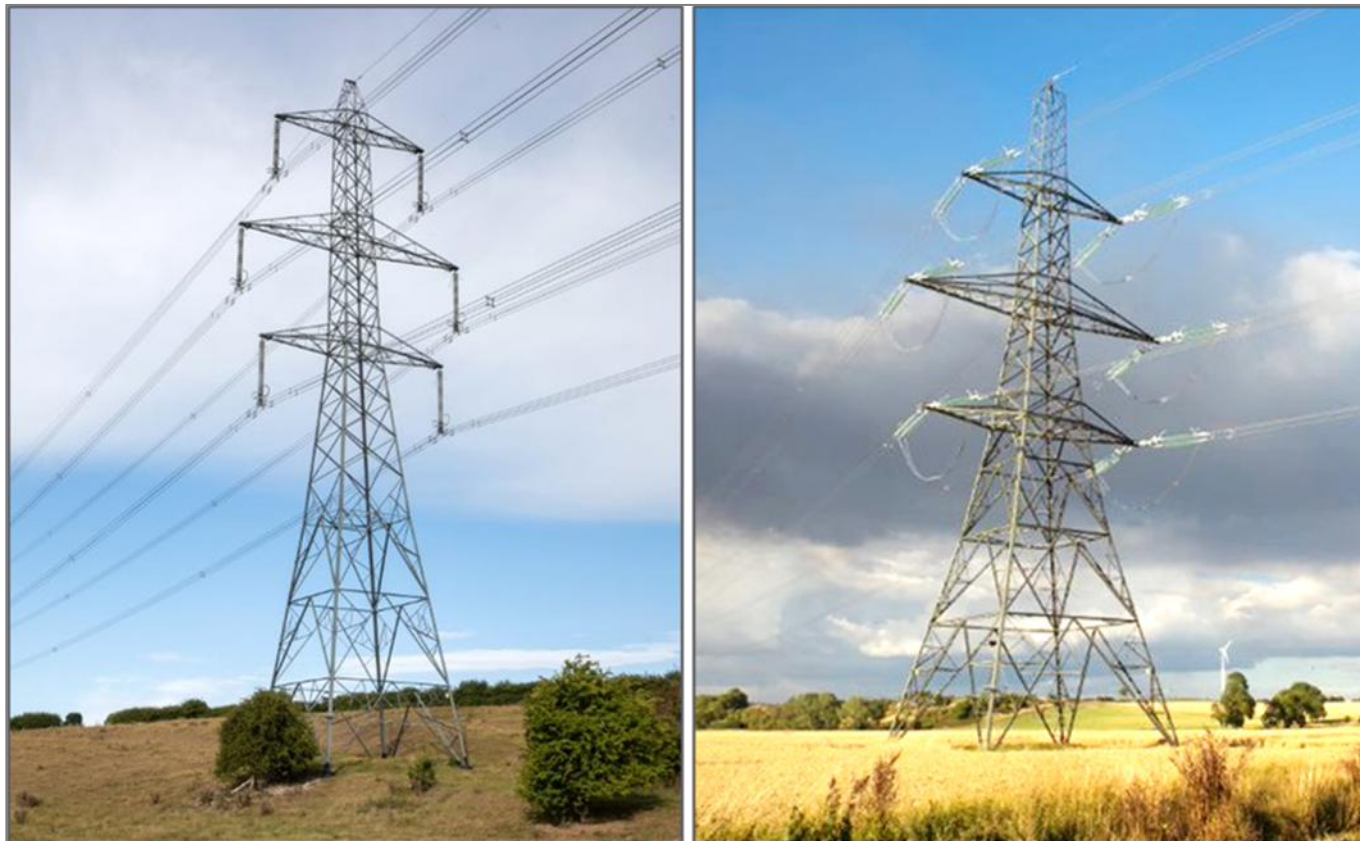


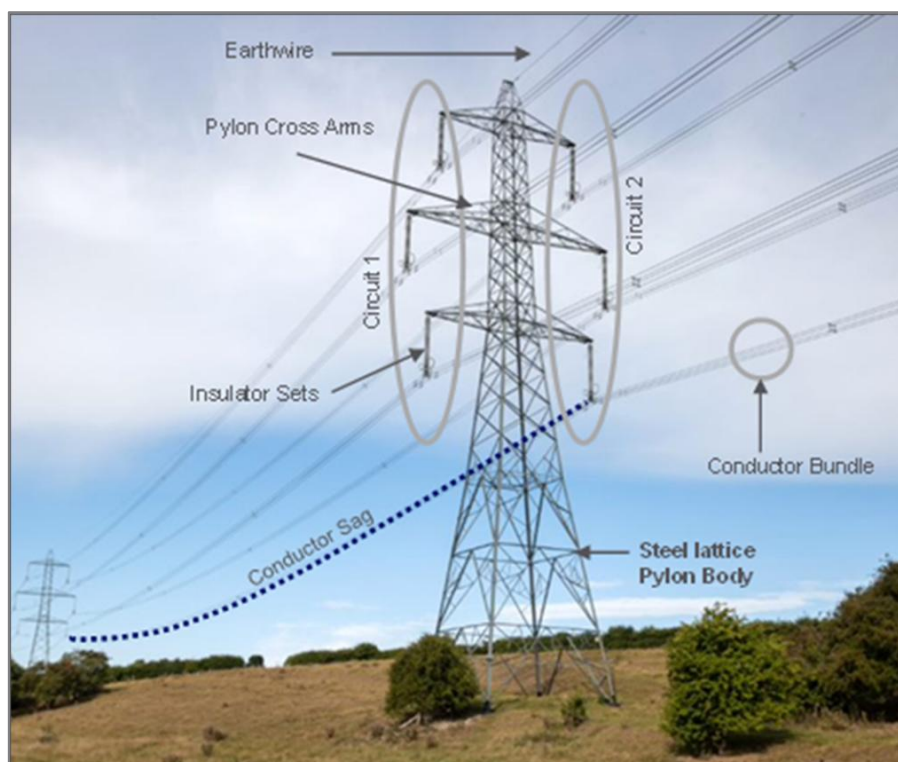
Image 4.3 Typical terminal lattice pylon



4.3.7 The new pylons would be steel lattice, the foundations of which would either be a standard foundation (concrete pad and column) or non-standard foundation (either concrete pad and column of increased dimension or depth, or piled foundations). The selection of foundation type would depend upon the ground conditions encountered and would be determined during detailed design following ground investigations.

- 4.3.8 The conductors are connected to the pylon by an insulator assembly consisting of a set of insulators (components made from a material with a high resistance to the flow of electric current such as porcelain, glass or polymer) and steel fittings and conductor clamps. Additional fittings, such as spacers and vibration dampers, would be fitted to the conductors. Spacer dampers prevent the conductors from touching each other and vibration dampers prevent oscillations from the conductors from reaching the insulator fittings and minimise effects of fatigue loading. Arcing horns would also be required, to protect insulators from over-voltages due to electrical faults or lightning strikes.
- 4.3.9 The main components of an overhead line are shown in **Image 4.3**, which shows a typical steel lattice suspension pylon.

Image 4.4 Components of a Typical Transmission Connection

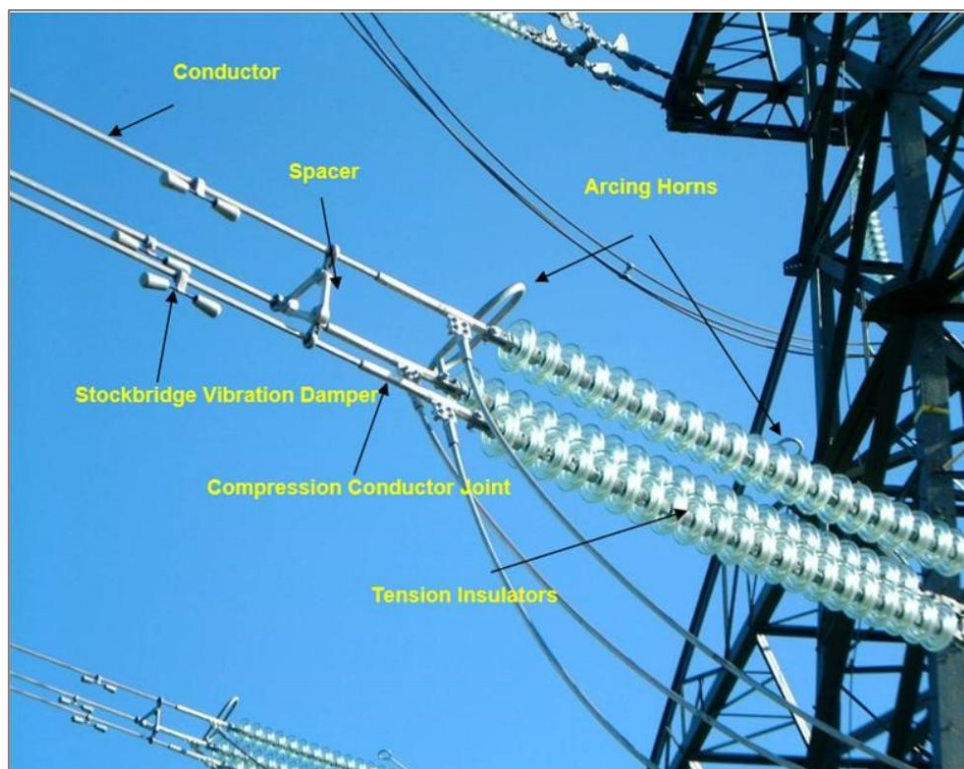


Proposed Conductors and Insulators

- 4.3.10 The conductor type would be triple Araucaria or alternative technology that performs to the same or a better standard in relation to reducing operational noise. The triple Araucaria conductor comprises of three sub-conductors per bundle, and a total of 6 phases made up of 18 sub-conductors per pylon which carry the electrical current along the overhead line route.
- 4.3.11 The overhead line would also be installed with an earthwire, typically consisting of a smaller single conductor which runs along the peaks of the pylons. The earthwire provides an electrical earth connection between the pylons to provide protection against lightning and distribution of fault currents. The earthwire may also contain a fibre optic cable which allows for telecommunication signals to be communicated along the overhead line route.

- 4.3.12 A tension pylon would typically have one insulator string in a horizontal position per conductor in each conductor bundle attached to the end of each cross arm (i.e. three insulator strings for a conductor bundle consisting of three conductors).
- 4.3.13 Tension insulators are oriented roughly horizontally outwards from the crossarm ends and accommodate the longitudinal force of the tension of the conductors. Conductor fittings are shown in **Image 4.5**.

Image 4.5 Conductor Fittings



Limit of Deviation

- 4.3.14 Within the design of the S37 4MZ Overhead Line Works, there is a need for some flexibility, which has been accounted for in the assessments for this application. The horizontal LoD applied either side of the full length of the overhead line centreline is 50m, for a total width of 100 m. Where the width of the LoD is 100m, the extent of movement of any pylon is limited by the span length and conductor swing. At a maximum span length, the centre of the pylon could move approximately 20m either side of the centreline subject to topography and local conditions.
- 4.3.15 There would be no fixed limit on the movement of a pylon along the centreline of the proposed route i.e. pylons can move up and down the centreline (longitudinal LoD). While there is no fixed limit, in practical terms the movement of pylons along the centreline is constrained by a combination of the span distance between adjacent pylons and maintaining the necessary ground clearances without exceeding the vertical LoD.
- 4.3.16 The vertical LoD applied along the length of the overhead line is 6 m to allow for the pylon height to be increased in order to increase ground clearances.

Construction

- 4.3.17 The construction of the new 400 kV overhead line would typically follow the sequence outlined below:
- 1) surveys including archaeological investigation;
 - 2) ground investigation;
 - 3) Site preparation activities, including any vegetation clearance;
 - 4) installation of fencing (stock or demarcation) depending on land use and gates or equivalent as required;
 - 5) topsoil stripping, temporary drainage installation where required;
 - 6) installation of haul roads (including culverts and bridges) and demarcated pylon working areas;
 - 7) installation of pylon foundations (pad and column, mini pile, tube pile or bespoke);
 - 8) steelwork lay out and assembly and erection of steelwork;
 - 9) installation of pylon signage including safety notice plate and anti-climbing devices;
 - 10) installation of crossing protection prior to stringing of conductors, including scaffolding and road/lane closures;
 - 11) installation of insulator assemblies on suspension pylons;
 - 12) establishment of machine sites for conductor stringing;
 - 13) conductor and earthwire stringing;
 - 14) temporary earthing;
 - 15) installation of tension insulator assemblies on tension and terminal pylons;
 - 16) setting conduction tensions (sagging) and clearances, and installing spacers and jumpers;
 - 17) removal of construction equipment and reinstatement of ground and restoration of soils;
 - 18) removal of haul roads, bellmouths, temporary culverts and access bridges; and
 - 19) removal of construction compounds and ground reinstatement.
- 4.3.18 There would be a temporary construction corridor established along the route which comprises temporary sections of haul road totally 1260.75 to be used exclusively for the for the 4ZM works (see sectioned hatched in blue on the s37 4ZM Application Site Plan - GWNC-LST-4ZM-ZZZZZZ-PLN-EN-000002). These sections will branch off of a longer stretch of haul road established from Stone Gate, and for which consent is sought as part of the TCPA application for the Substation Works. These are included with the Section 37 application as ancillary works under Section 90(2) of the TCPA.
- 4.3.19 Access for maintenance and inspection will typically be via field gates with landowners.

- 4.3.20 Both heavy goods vehicles (HGVs) and Light goods vehicles (LGVs) associated with construction of the substation and overhead line would access the site via the proposed haul road from Stone Gate. Light goods vehicles (LGVs), including staff accessing the compound north of the substation, would also use Marsh Road.

Pylon Working Areas

- 4.3.21 Pylon working areas would typically be 60 m by 60 m for a suspension pylon and 80 m by 80 m for a tension pylon. They would either be stone laid on a geotextile, or formed of interlocking panels, depending on ground conditions and the duration and type of use. Soil stabilisation techniques could be considered subject to local conditions.

Installation of pylon foundations (pad and column, mini pile or tube pile)

- 4.3.22 The foundations for the pylons would either be pad and column, mini pile or tube pile (or bespoke if required). The selection of foundation type would depend upon the ground conditions encountered, this will be determined during detailed design.

Assembly and erection of steelwork

- 4.3.23 The steelwork components would be brought to each pylon working area. The steelwork components would be bolted together on the ground. The pylon would be assembled in sections beginning from ground upwards, using a telehandler for the lower sections and a mobile crane for the upper sections. Assembly of horizontal steel would be undertaken at ground level.

Installation of Insulators

- 4.3.24 The insulators would be fastened to the cross arms of the pylons, with running out wheels hung from the end of the insulators to carry the pilot wires in preparation for installing the conductors.

Establishment of Machine Sites for Conductor Stringing

- 4.3.25 The conductors would usually be installed from tension pylon to tension pylon along intermediate suspension pylons, often termed a 'section', with machine sites required at either end of the section.
- 4.3.26 The machine sites for conductor stringing would normally be located within the pylon conductor pulling positions, typically sited on earthed aluminium interlocking panels laid directly onto the ground surface reducing disturbance to the underlying soils.
- 4.3.27 A conductor pulling position would be established at each end of the section with a pulling machine ('puller') and empty steel reels to accept pilot wires. At the other end of the section the full conductor drums would be arranged in close proximity to the tensioning machine ('tensioner').

Conductor stringing

- 4.3.28 The conductors would be delivered to pulling positions on large cable drums. The drums containing the conductors would typically be delivered to the shared construction compound or satellite compound, first, and would be distributed from there. All four of the compound sites are included in the TCPA application for consent for Substation Works sought under the TCPA, and are not included as ancillary works seeking consent under this Section 37 application.
- 4.3.29 Light pilot wires (sometimes referred to as pilot bonds) would be laid at ground level (along the length of the section between the pulling positions).
- 4.3.30 The pilot wires would be lifted and fed through running out wheels on the cross arms of all the pylons in the section and then fed around the winch at the pulling position. The light pilot wires are used to pull heavier, stronger pilot wires which are in turn used to pull conductors through from their drums. The tensioning machine would keep the wires off the ground and prevent the conductors running freely when the winch pulls the pilot wire. When the conductor is fully 'run out', it would be fastened at its final tension and height above ground by lines persons working from platforms on the tension pylons which are suspended beneath the crossarms. Jumpers and additional fittings, such as spacers, vibration dampers and arcing horns would be fitted.

Dismantling the Overhead Line to be removed.

- 4.3.31 There are a number of methods that can be used to remove the pylons depending on available space and surrounding features. Typically, a tractor or a mobile crane may be used to fell or dismantle the pylon either whole or in parts. A suitable sized pylon working area would be set up at the pylon base. This would be sized according to plant size/site constraints and typically may be constructed on a temporary stone pad / temporary mats / soil stabilisation.
- 4.3.32 Once the pylon is felled it would typically be cut into sections for removal off site. If there was a compelling need for removal of all the foundations, these would be removed to approximately 1.5 m deep, sufficient for safe agricultural use of the land and subsoil and topsoil reinstated. All waste would be removed from site and, where feasible, recycled in line with waste disposal regulations at the time and best practice measures outlined in the Outline Construction Environmental Management Plan (OCEMP).

Removal of Construction Equipment and Site Reinstatement

- 4.3.33 Once the S37 4ZM OHL Works have been constructed, the haul roads and working areas at the pylon sites would be removed and the ground reinstated to the previous condition. Other surfaces would be reinstated.

Operation

- 4.3.34 The new Weston Marsh Substation A would enable ODOW to connect to the electricity transmission system. Once operational, on-site activity at the new Weston Marsh Substation A would generally be limited to regular inspection and maintenance.

Deemed Approval Works

- 4.3.35 The scope of deemed approval comprises temporary and minor permanent works directly associated with the S37 4ZM Overhead Line Works. These are detailed in the accompanying s37 4ZM Application CDM Plan -GWNC-LST-4ZM-ZZZZZZ-PLN-EN-000003 and include:
- OHL infrastructure, including pylons, conductors and all associated foundations. The deemed approval under section 90(2) of the TCPA also extends to these elements.
 - A 1260.75m of new haul road over three sections accessing Pylon 4ZM408, 4ZM408-N and 4ZM407-N.
 - Three SuDs basins located along the haul road.
 - Crossing protections (safety systems (e.g. net guards and support structures) installed at overhead line crossings to catch or contain falling cables and protect traffic, workers, and the public) Restrung areas in proximity of 4ZM407-N., 4ZM408-N and 4ZM414-N.
 - Crossing protections along the haul road.

Landscaping/mitigation

- 4.3.36 The Scheme has been designed to avoid and reduce impacts on the existing habitats and landscape during construction and operation. Best practice and management measures during construction will be controlled in accordance with the OCEMP.
- 4.3.37 Tree planting and the creation of replacement habitat is proposed as shown on the Indicative Landscape and Ecological Mitigation Proposals Plan submitted with the Whilst mitigation proposals are secured through the TCPA application, it is important to note that the S37 4ZM Overhead Line Works are intrinsically linked to the TCPA consent and would not proceed in its absence. As such, any habitat impacts arising from the Section 37 Overhead Line Works would be appropriately mitigated and reinstated as part of the approved TCPA scheme. Accordingly, the Section 37 would not result in the loss of habitats that would not otherwise be replaced, and would deliver ecology enhancements and screening benefits in proximity to the Substation Works.

Agreed overhead line exemption works

- 4.3.38 SHDC have confirmed that associated Overhead Line Works fall within the scope of the Overhead Lines (Exemption) (England and Wales) Regulations 2009 (as amended). SHDC formally approved this by signing Annex B of Form B on 11 May 2026.
- 4.3.39 The agreed exempt works comprise both permanent and temporary works to the existing 4ZM Overhead Line Works. Permanent works include the restringing and modification of the overhead line, together with the replacement of insulators and fittings on pylons 4ZM405, 4ZM406, 4ZM410, 4ZM411, 4ZM412, 4ZM413 and 4ZM414, which fall under Regulation 3(1)(e).
- 4.3.40 Temporary works include the installation and subsequent removal of temporary overhead line diversions between 4ZM410 to 4ZM409-T to 4ZM408 and 4ZM408 to 4ZM407-T to 4ZM406, as well as the installation of temporary masts at 4ZM409-T and 4ZM407-T. These elements therefore fall under Regulation 3(1)(c).

5. Planning Policy Appraisal

5.1 Introduction

5.1.1 If consent is granted for the S37 4ZM Overhead Line Works, the consent would result in a deemed grant of planning permission. As such, the section below considers the predicted effects of the proposed overhead line works against relevant planning policy.

5.2 Local Planning Policy

South East Lincolnshire Local Plan 2011-2036

5.2.1 The current adopted Development Plan for SHDC is made up of the following policy documents:

- The South East Lincolnshire Local Plan 2011-2036 (SELLP) (Ref 16); and
- The Lincolnshire Minerals and Waste Local Plan; Core Strategy and Development Management Policies (2016) (LMWLP) (Ref 17)

5.2.2 At the time of writing this Statement, there is no published draft or made neighbourhood plan in the vicinity.

5.2.3 The relevant policies within the SELLP for the Scheme are:

- 1) Policy 1 Spatial Strategy.
- 2) Policy 2 Development Management.
- 3) Policy 3 Design of New Development.
- 4) Policy 4 Approach to Flood Risk.
- 5) Policy 28 The Natural Environment.
- 6) Policy 29 The Historic Environment.
- 7) Policy 30 Pollution.
- 8) Policy 31 Climate Change and Renewable and Low Carbon Energy.
- 9) Policy 32 Community, Health and Wellbeing.
- 10) Policy 33 Delivering a More Sustainable Transport.

5.3 National Policy

National Planning Policy Framework (NPPF)

5.3.1 As with an application for TCPA planning permission, National Planning Policy, which is set out in the National Planning Policy Framework (NPPF) (December 2024) (Ref 18), is a material consideration. The NPPF sets out the Government's economic,

environmental, and social planning policies for England. Central to national planning policy as a 'presumption in favour of sustainable development, and the NPPF is clear that consent should be granted for development proposals that accord with the development plan, without delay.

- 5.3.2 The NPPF covers a range of policy areas that should be taken into consideration when assessing the acceptability of a proposed development the aim of delivering sustainable development.
- 5.3.3 The policy areas relevant to this Scheme include:
- 1) Chapter 2: Achieving sustainable development
 - 2) Chapter 8: Promoting healthy and safe communities
 - 3) Chapter 9: Promoting sustainable transport
 - 4) Chapter 12 Achieving well-designed places
 - 5) Chapter 14: Meeting the challenge of climate change, flooding and coastal change; and
 - 6) Chapter 15: Conserving and enhancing the natural environment
 - 7) Chapter 16: Conserving and enhancing the historic environment
- 5.3.4 In December 2025, the government consulted on a draft revised NPPF. The consultation closed on 10 March 2026.
- 5.3.5 The proposed changes to the NPPF include changes to the overall document structure in addition to a number of reforms that seek to boost the delivery of new homes and further support commercial development in order to drive growth. These reforms remain consistent in terms of the national policy position for this Scheme in relation to suitably located development outside settlements including the development of energy infrastructure.

National Policy Statements

- 5.3.6 National Policy Statements (NPS) provide the primary basis for decision making on DCO applications for NSIPs under the Planning Act 2008. In addition, the NPPF paragraph 5 recognises that NPSs form part of the framework of national planning policies and can be a material consideration for planning applications.
- 5.3.7 The NPSs relevant to this Scheme include:
- 1) Overarching National Policy Statement for Energy (EN-1), 2025 (Ref 19)
 - 2) National Policy Statement for Electricity Networks Infrastructure (EN-5), 2025 (Ref 20)
- 5.3.8 These NPS's were prepared to address the balance of impacts and benefits resulting from energy projects of national significance. As such, these are considered to be important and relevant to this Scheme.

5.4 Planning Appraisal

Principle of Development

- 5.4.1 Section 3 of this Statement sets out the need case for this S37 4ZM Overhead Line Works application, alongside the other elements of the Scheme. The need for this Scheme has been clearly demonstrated as urgent, in order to ensure a sufficient network capacity required for ODOW to connect to transmission system by 2030.
- 5.4.2 The S37 4ZM Overhead Line Works fall outside of a defined settlement boundary and, therefore, are considered to fall within the countryside in accordance with South East Lincolnshire’s spatial strategy defined by Policy 1 of the SELLP.
- 5.4.3 Central to the NPPF is a presumption in favour of sustainable development, with paragraph 8 of the NPPF recognising that:
- “Achieving sustainable development means that the planning system has three overarching objectives which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).”
- 5.4.4 These cover an economic objective, social objective and environmental objective that should be delivered through the application of policies in the NPPF.
- 5.4.5 Paragraph 11 of the NPPF clarifies that for decision-taking this means:
- “Approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.”*
- 5.4.6 In regard to supporting the transition to net zero by 2050, paragraph 161 of the NPPF states that the planning system should take full account of all climate impacts and should help to support renewable and low carbon energy and associated infrastructure.
- 5.4.7 When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, paragraph 168 of the NPPF states that local planning authorities should:
- “Not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal’s contribution to a net zero future.”*

- 5.4.8 NPS EN-1 establishes a significant and urgent need to deliver new energy infrastructure in order to: support economic growth; boost productivity; enhance competitiveness; support social well-being; and decarbonise the energy system to meet the Government's net zero targets.
- 5.4.9 In particular, paragraph 2.1.2 of the NPS EN-1 recognises that a significant amount of infrastructure is needed at both a local and national scale in order to produce the energy required for the UK and ensure that it can be transported to where it is needed.
- 5.4.10 Paragraph 1.1.2 of the NPS EN-5 notes that a significant amount of new network infrastructure is required to directly support the Clean Power 2030 Mission.
- 5.4.11 Clean Power 2030 sets out how the Government will deliver on the Prime Minister's Plan for Change to build an energy system that can bring down bills for households and businesses for good.
- 5.4.12 Paragraph 4.2.16 of the NPS EN-1 establishes that certain types of development for low carbon infrastructure required to the Clean Power 2030 Action Plan, are Critical National Priority (CNP) Infrastructure.
- 5.4.13 Policy 1 (Spatial Strategy) of the SELLP details that within countryside locations:
“development will be permitted that is necessary to such a location and/or where it can be demonstrated that it meets the sustainable development needs of the area in terms of economic, community or environmental benefits.”
- 5.4.14 The S37 4ZM Overhead Line Works are an essential part of the Scheme, as described in **Table 1.3** of this Statement, with the purpose of delivering the required connection for ODOV by 2030. This connection is critical for providing an urgent supply of renewable energy to transmission network, in line with an identified need supported by NPS EN-1.
- 5.4.15 Whilst not meeting the test to be considered a NSIP as a standalone development, the S37 4ZM Overhead Line Works will enable the connection and distribution of renewable energy infrastructure, contributing to the UK's transition away from fossil fuels and the delivery of Clean Power 2030. Therefore, significant weight in support of the principle of development should be afforded to the compliance with the NPS's in the consideration of this application.
- 5.4.16 Economically and socially, this Section 37 Application underpins a need for essential electricity infrastructure, enabling greater integration of renewable energy into the network and supporting the reliable supply of renewable electricity to homes and businesses, in line with the net zero objectives.
- 5.4.17 Environmentally, this Section 37 Application has been subject to robust assessment in the context of the wider Scheme, concluding that there would be no significant adverse effects on the environment that would outweigh the strong presumption in favour of sustainable development or the identified need for the type of development in national policy.
- 5.4.18 This Section 37 Application is therefore compliant with the NPPF paragraphs 8, 11, 161, and 168, NSP EN-1, NSP EN-5, and Policy 1 of the SELLP, and should be approved without delay.

Design and Function

- 5.4.19 In preparing this application for consent pursuant to Section 37, National Grid must have regard to Schedule 9 of the Electricity Act 1989 to preserve amenity by:
- Schedule 9 paragraph 1(1)(a) “...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
- Schedule 9 paragraph 1(1)(b) “...do what [it] reasonably can 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”
- 5.4.20 Paragraph 131 of the NPPF states that “good design is a key aspect of sustainable development”
- 5.4.21 Paragraph 135 of the NPPF sets out that planning decisions should ensure that a development function well over its lifetime, is visually attractive as a result of good design, layout and appropriate and effective landscaping, and is sympathetic to local character, history and landscape setting, whilst not preventing or discouraging appropriate innovation or change.
- 5.4.22 On decision making, paragraph 4.7.11 of the NPS EN-1 states that:
- “The Secretary of State should be satisfied the applicant has considered both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located, any potential amenity benefits, and visual impacts on the landscape or seascape) as far as possible.”*
- 5.4.23 Policy 2 (Development management) of the SELLP states that a proposal requiring planning permission will be permitted provided that sustainable development considerations are met. These include size, scale, layout, density and impact on the amenity, character and appearance of the areas, as well as the quality of its design and orientation.
- 5.4.24 The layout of the new overhead lines proposed by this Section 37 Application was informed by a siting study exercise that considered the Scheme in its entirety, developed in accordance with the Holford Rules and Horlock Rules.
- 5.4.25 Relevant to Section 37 4ZM Overhead Line Works, the Holford Rules provide a set of design criteria representing industry best practice in overhead line routeing. These guidelines form an important part of the development of electricity networks as set out in NPS EN-5.
- 5.4.26 The siting of the proposed Substation Works in close proximity to the existing overhead line junction at Spalding Tee-Point sought to limit the overhead line deviations from the existing 4ZM and 2WS overhead lines. In doing so, this has reduced the amount of new overhead line required to connect the new substation to these existing lines and thus reduced the spread of new infrastructure within the landscape and views.
- 5.4.27 Careful consideration has been given to the location of access tracks and bell mouths to minimise the loss of vegetation and help to maintain a natural screening, filtering views of the S37 4ZM Overhead Line Works.

- 5.4.28 The shortest and most direct routes have been adopted for the turn-ins to the new substation. Appropriate stand-off distances of 50 m or 100 m have been applied to sensitive receptors including designated sites, priority habitats, heritage assets, residential properties and watercourse.
- 5.4.29 The design of pylons has been led by the functional need and the safety requirements that derive from the role of this type of infrastructure and the technical requirements of National Grid to construct and maintain it. A series of drawings have been submitted with this S37 Application detailing the proposed tower specification and ancillary infrastructure required to deliver and maintain the new and existing pylons and overhead lines. A full description of works is set out in Section 5 of this Statement.
- 5.4.30 Overall, this Section 37 Application has been designed to balance functional requirements with environmental and visual impacts. Through carefully considered design, the application has minimised land take, reduced visual impact and preserved amenity, demonstrating adherence to the Holford Rules, representing a high-quality and sustainable design consistent with policy requirements.
- 5.4.31 This Section 37 Application is therefore compliant with the requirements of Schedule 9 of the Electricity Act 1989 and represent high quality and function design in accordance with the NPPF paragraphs 131 and 135, NPS EN-1 and Policy 2 of the SELLP.

Landscape and Visual Impact

- 5.4.32 Schedule 9 paragraph 1(1)(a) of the Electricity Act 1989 is relevant in its requirement to have regard to preserving natural beauty, geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest'. This is also underlined by paragraph 2.2.10 of the NPS EN-5.
- 5.4.33 Paragraph 187 of the NPPF states that development should contribute to and enhance the natural and local environment, including by protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside.
- 5.4.34 Paragraph 5.10.1 of NPS EN-1 acknowledges that:
“The landscape and visual effects of energy projects will vary on a case-by-case basis according to the type of development, its location and the landscape setting”
- 5.4.35 At a local level, Policy 3 of the SELLP (Design of New Development) requires that the landscape character of the location of a development should be considered in the appropriate design of a development.
- 5.4.36 Paragraph 3.4.4 of the SELLP states that:
“The character of the landscape in rural locations can influence the size, shape and orientation of buildings as a result of its ability to absorb development, indicated by the description and the sensitivities of the landscape in the landscape character assessments.”
- 5.4.37 Policy 31 Part B (Renewable Energy) expects renewable energy proposals and associated infrastructure to ensure there is no significant harm to the visual amenity, landscape character or quality, or the skyline of the area.

- 5.4.38 As set out above, the design of the S37 4ZM Overhead Line Works has been developed in accordance with the Holford Rules and has sought to reduce the length of new overhead line required. The dismantling and removal of pylons over approximately 730m of overhead line along the existing 4ZM route is proposed, resulting in a net increase of only 170m of overhead line and a net increase of two new pylons.
- 5.4.39 While the new alignment would introduce a change in direction to divert the line into the proposed substation, this deviation is modest in extent and will remain read as part of the existing overhead line corridor, which already establishes a strong linear character in the landscape.
- 5.4.40 A Landscape and Visual Appraisal (LVA) was undertaken for the Scheme, which considered the Scheme in its entirety including assessment of impacts attributable to the S37 4ZM Overhead Line Works.
- 5.4.41 The accompanying EAR summarises the assessment baseline for the LVA, providing a detailed assessment of impacts and effects during the construction and operation phases of development.
- 5.4.42 The EAR concludes that, given the presence of existing overhead lines and localised area, any potential impact on the surrounding landscape during construction and operation would be minor adverse or negligible.
- 5.4.43 Permanent planting is proposed to filter views of the Scheme once operational, integrating it into the landscape. This planting will be secured by the accompanying TCPA application for the Substation Works. Therefore, no long-term significant effects are anticipated.
- 5.4.44 Overall, when considered in the round with the other elements of the Scheme, the design and mitigation measures, including those set out in the Outline CEMP, and the permanent planting proposals to be secured via the TCPA Application, there would be no unacceptable impact in terms of landscape and visual effects.
- 5.4.45 This Section 37 Application is therefore compliant with the NPPF paragraph 187, NPS EN-1 and Policies 3 and 31 of the SELLP.

Ecology and Biodiversity

- 5.4.46 The NPPF seeks to ensure planning decisions contribute to and enhance the natural and local environment. Paragraph 187 of the NPPF states that such enhancement should be achieved by protecting and enhancing sites of biodiversity or geological value and soils and minimising impacts on and providing net gains for biodiversity.
- 5.4.47 Paragraph 193 of the NPPF sets out that where significant harm cannot be avoided through alternative siting, adequately mitigated, or as a last resort compensated for, planning permission should be refused. Moreover, that development resulting in the loss or deterioration of irreplaceable habitats should be refused unless there are wholly exceptional reasons.
- 5.4.48 In particular, Paragraphs 193(b), 194 and 195 of the NPPF afford strong protection to SSSIs and habitats sites, with the presumption against development where a project is likely to have a significant effect on such a site.

- 5.4.49 Paragraph 5.4.20 of the NPS EN-1 states the expectation that applicants show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.
- 5.4.50 Paragraph 5.4.23 of the NPS EN-1 recognises the impact that energy projects can have on migratory species stating that the design of proposals must consider movement of mobile/migratory species and their potential to interact with infrastructure.
- 5.4.51 Paragraph 5.4.36 sets out the need for mitigation and requires that application include appropriate avoidance, mitigation, compensation and enhancement measures, including during construction activities.
- 5.4.52 More specifically, paragraphs 2.10.2 to 2.10.4 of the NPS EN-5 refer to the impacts of overhead lines on birds, stating that lines should be made visible where possible to avoid birds colliding with the lines, and avoiding perching areas.
- 5.4.53 Policy 28 (The Natural Environment) of the SELLP reiterates the importance of protecting, enhancing and managing natural assets, stating that proposals that harm internationally designated sites would only be allowed in exceptional circumstances and must be fully compensated. Moreover, proposals affecting national or local sites and protected species would only be permitted where no less harmful alternatives exist, the benefits clearly outweigh harm, and effective mitigation and compensation are secured.
- 5.4.54 To support this Section 37 Application, a full suite of ecology surveys have been undertaken and the results presented in reports covering bats, badgers, aquatics, breeding birds, non-breeding birds, otter and water voles, great crested newts and more habitat classification. In addition, a report to inform Habitats Regulations Assessment Stage 1 Screening has been prepared for all components of the Scheme.
- 5.4.55 The accompanying EAR summarises the assessment baseline for designated sites, habitats and protected or notable species, providing a detailed assessment of impacts and effects during the construction and operation phases of development.
- 5.4.56 The EAR concludes that impact during construction to identified designated sites, habitats, protected species, and impacts to the spread of Invasive Non-native Species will be managed through measures set out in the Outline CEMP. Therefore, no significant effects on ecology and biodiversity are anticipated during construction.
- 5.4.57 Due to the nature of works proposed, it is considered there would be a negligible change to collision risk. The EAR concludes that there would be no significant effects on ecology and biodiversity predicted during operation.
- 5.4.58 This Section 37 Application is therefore compliant with the NPPF paragraph 187 and 193, NPS EN-1, NPS EN-5, and Policy 28 of the SELLP.

Historic Environment

- 5.4.59 Paragraph 207 of the NPPF states that when determining applications, local planning authorities should require applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and sufficient to understand the potential impact of the proposal on their significance.

- 5.4.60 Paragraph 212 states that:
- “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*
- 5.4.61 Paragraph 213 require any harm to, or loss of the significance of a heritage asset should be clearly justified.
- 5.4.62 Paragraph 215 outlines that:
- “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*
- 5.4.63 Section 5.9 of NPS EN-1 sets out how applicants should approach heritage assets when assessing energy infrastructure. Specifically, paragraph 5.9.29 of the NPS EN-1 states that:
- “Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.”*
- 5.4.64 Paragraph 2.2.10 of the NPS EN-5 makes reference to the Schedule 9 of the Electricity Act 1989 stating that transmission proposals should *‘have regard to the desirability of ... protecting sites, buildings and objects of architectural, historic or archaeological interest’*.
- 5.4.65 Policy 29 of the SELLP (The Historic Environment) requires development to conserve and, where appropriate, enhance the historic environment, including giving consideration to the significance of the context of both designated and non-designated heritage assets.
- 5.4.66 A Historic Environment Desk Based Assessment (DBA) for the Scheme in its entirety that included an assessment of impacts attributable to the S37 4ZM Overhead Line Works. This included an aerial photographic and LiDAR assessment and was informed by a geophysical survey of accessible areas.
- 5.4.67 The accompanying EAR summarises the assessment baseline for DBA, providing a detailed assessment of impacts and effects during the construction and operation phases of development.
- 5.4.68 The EAR concludes that there are no expected physical impacts to designated or non-designated historic buildings during construction of the S37 4ZM Overhead Line Works. However, there is the potential for permanent and temporary setting changes as a result of temporary impacts during the construction phase of development including from an increase in noise, light and construction equipment. The harm is assessed in the EAR as being less than substantial to the significance of these heritage assets.
- 5.4.69 The EAR also concludes the potential for permanent impacts arising from construction of the S37 4ZM Overhead Line Works to non-designated archaeological assets. The harm is assessed in the EAR as being less than substantial harm to the significance of these heritage assets.

- 5.4.70 In applying the policy test set out in paragraphs 212 to 215 of the NPPF and Section 5.9 of NPS EN-1, it is considered that the potential for less than substantial harm to heritage assets is outweighed by the benefits of the Scheme, in particular with regard to the urgent strategic need to deliver low carbon infrastructure linked to the Clean Power 2030 Action Plan and directly contributing to central Government's commitment to transition away from fossil fuels and the delivery of clean power by 2030.
- 5.4.71 The EAR concluded that there would be no significant effects to these heritage assets during the operation of the S37 4ZM OHL Works.
- 5.4.72 This Section 37 Application is therefore compliant with the NPPF 207, 212, 213, and 215, NPS EN-1, NPS EN-5, and Policy 29 of the SELLP.

Water Environment

- 5.4.73 Paragraphs 170 to 182 of the NPPF set out the expected considerations for planning and flood risk, stating in paragraph 170 that:

“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”
- 5.4.74 Paragraph 182 of the NPPF requires proposals affecting drainage on or around the site to incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, proportionate to the nature and scale of the proposal.
- 5.4.75 NPS EN-1 reiterates the importance of ensuring flood risk from all sources of flooding in order to prevent inappropriate development in areas at risk of flooding.
- 5.4.76 Paragraph 5.8.36 of NPS EN-1 states that the Secretary of State will consider how *‘In flood risk areas the project is designed and constructed to remain safe and operational during its lifetime, without increasing flood risk elsewhere’*.
- 5.4.77 Paragraph 5.8.41 of NPS EN-1 states that whilst energy projects should not typically be located within Flood Zone 3b *‘where essential energy infrastructure has to be located in such areas, for operational reasons, they should only be consented if the development will not result in a net loss of floodplain storage, and will not impede water flows’*.
- 5.4.78 Paragraph 5.8.41 of NPS EN-1 requires that development helps to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.
- 5.4.79 Paragraph 5.8.41 of NPS EN-1 recognises that infrastructure development can have adverse effects on the water environment.
- 5.4.80 Paragraph 5.16.10 of NPS EN-1 sets out that the risk of impacts on the water environment should be reduced through careful design *“to facilitate adherence to good pollution control practice.”*
- 5.4.81 Paragraph 5.16.13 of NPS EN-1 notes that the Secretary of State must give impacts on the water environment more weight where a project would have an adverse effect on the achievement of the environmental objectives established under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.

- 5.4.82 Policy 2 (Development Management) of the SELLP states that planning permission for development will be permitted where sustainable development considerations are met, including amongst other things, sustainable drainage and flood risk.
- 5.4.83 Policy 3 (Design of Development) of the SELLP requires development proposals to demonstrate how flood risk has been mitigated through design and the use of sustainable drainage systems (SuDS).
- 5.4.84 Policy 30 (Pollution) states that development will not be permitted where it would lead to an unacceptable adverse impact on amongst other things, surface and ground water quality, taking account of any proposed mitigation measures.
- 5.4.85 Policy 31 (Climate Change and Renewable and Low Carbon Energy) states that development proposals will be required to demonstrate that the consequences of current climate change have been addressed, minimised and mitigated. This should include through the incorporation of flood-mitigation measures in design and construction to reduce the effects of flooding, and the protection of the quality, quantity and availability of water resources.
- 5.4.86 The accompanying EAR summarises the assessment baseline for flood risk, drainage and water quality, providing a detailed assessment of impacts and effects during the construction and operation phases of development.
- 5.4.87 The EAR concludes that, given the S37 4ZM Overhead Line Works would result in a net increase of only two pylons within a defended floodplain. There would be no new pylons introduced within the functional floodplain. Therefore, the works are not considered to introduce any additional risks to flooding or drainage.
- 5.4.88 Therefore, no mitigation was provided in the Flood Risk Assessment or Surface Water Drainage Strategy for this S37 Application. Temporary SuDS basins are proposed as ancillary works during the construction phase, as detailed on the supporting figures submitted with this Section 37 Application.
- 5.4.89 The EAR also notes that a Water Framework Directive Assessment (WFD) was undertaken for the Scheme to assess the potential for impacts to the Moulton River. This included an assessment of the potential impacts at the construction and operational phases of the S37 4ZM Overhead Line Works on hydromorphological, biological, and physio-chemical quality elements.
- 5.4.90 The EAR concludes that the S37 4ZM Overhead Line Works along with the other Scheme elements are compliant with the objectives of the WFD in terms of design and mitigation measures and will avoid adverse impacts on the water environment as well as contribute positively to the long-term ecological resilience and hydromorphological integrity of the affected water bodies.
- 5.4.91 This Section 37 Application is therefore compliant with the NPPF 170 to 182, NPS EN-1, and the relevant parts of Policies 2, 3, 30 and 31 of the SELLP.

Land Contamination

- 5.4.92 Paragraph 198 of the NPPF states that:

“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well

as the potential sensitivity of the site or the wider area to impacts that could arise from the development.”

5.4.93 Paragraph 201 goes on to recognise that:

“The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities”

5.4.94 Policy 30 (Pollution) states that development will not be permitted where it would lead to an unacceptable adverse impact on amongst other things, land quality and condition, taking account of any proposed mitigation measures.

5.4.95 A Phase 1 Geoenvironmental Desk Study was undertaken for the Scheme, which considered the Scheme in its entirety, including assessment of impacts attributable to the S37 4ZM Overhead Line Works.

5.4.96 The accompanying EAR summarises the assessment baseline for geology and hydrogeology providing a detailed assessment of impacts and effects during the construction and operation phases of development.

5.4.97 The EAR concludes that during the construction phase of works control measures would be in place to prevent new contamination as well as identify and manage any pre-existing sources of contamination, in accordance with control measures set out by the Outline CEMP.

5.4.98 During operation, the S37 4ZM Overhead Line Works would not result in environmental effects to geology and hydrogeology receptors (including human health from ground contamination and Controlled Waters).

5.4.99 This Section 37 Application is therefore compliant with the NPPF paragraphs 198 and 201, and Policy 30 of the SELLP.

Agricultural Land and Soils

5.4.100 The S37 4ZM Overhead Line Works are located on Grade 1 Best and Most Versatile (BMV) land agricultural. Paragraph 187 (b) of the NPPF seeks to prevent the loss of BMV land and this is reiterated in NPPF footnote 65 which states that:

‘Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of higher quality.’

5.4.101 Paragraph 5.11.4 of NPS EN-1 notes that:

“Development of land will affect soil resources, including physical loss of and damage to soil resources, through land contamination and structural damage. Indirect impacts may also arise from changes in the local water regime, organic matter content, soil biodiversity and soil process.”

5.4.102 NPS EN-1 highlights at paragraph 5.11.34 that should BMV land be required, an acceptable justification would be required from the applicant and that *‘The Secretary of State should take into account the economic and other benefits of that land.’*

- 5.4.103 Policy 3 (Design of New Development) of the SELLP requires proposals to, amongst other criteria, minimising land take in order to protect best and most versatile soils.
- 5.4.104 Policy 31 (Climate Change and Renewable and Low Carbon Energy) of the SELLP sets out that development for renewable energy facilities and associated infrastructure will be permitted, individually or cumulatively, where there would be no significant harm to amongst other things, agricultural land take.
- 5.4.105 Whilst policy is clear that the effects on BMV should be minimised, there is no presumption against the use of BMV where it is justified to be necessary, and the impacts are considered.
- 5.4.106 Justification for the proposed location of the Scheme is set out in Section 3 of this Statement, to meet Clean Power 2030 and renewable energy customer connection requirements. Moreover, as set out above, the design of the S37 4ZM Overhead Line Works has been developed in accordance with the Holford Rules to reduce its environmental and amenity impact.
- 5.4.107 An Agricultural Land Classification Report (ALC) was undertaken for the Scheme, which considered the Scheme in its entirety, including assessment of impacts attributable to the S37 4ZM OHL Works.
- 5.4.108 In its totality, the Scheme would result in Grade 1 land take of 19.69 ha, which represents only 0.03 % of the land classified as Provisional Grade 1 land, and only 0.004 % of land classified as Best and Most Versatile (defined as land mapped as Provisional ALC Grades 1, 2 and 3), in Lincolnshire.
- 5.4.109 The accompanying EAR summarises the assessment baseline for agricultural lands and soils, providing a detailed assessment of impacts and effects during the construction and operation phases of development.
- 5.4.110 During construction, there will be temporary disturbance to agricultural land and soils through planned construction activities. An Outline Soil Management Plan has been produced setting out measures that will be implemented Scheme-wide to protect soil resources during the construction and to ensure that soils remain suitable for successful reinstatement
- 5.4.111 The EAR notes that the land take from the S37 4ZM Overhead Line Works once operational, is relatively small and the land used temporarily during construction would be returned to agricultural use, in accordance with the Soil Management Plan within the Outline CEMP. Therefore, the S37 4ZM Overhead Line Works do not negatively impact on agriculture and soils during operation.
- 5.4.112 This Section 37 Application is therefore compliant with the NPPF paragraph 187, NPS EN-1 and Policies 3 and 31 of the SELLP.

Transport and Movement

- 5.4.113 Paragraph 115 of the NPPF requires proposals to consider appropriate opportunities to promote sustainable transport modes. Moreover, Paragraph 116 states that:
- “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

- 5.4.114 Paragraph 105 of the NPPF sets out that planning decisions should:
“Protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users”.
- 5.4.115 Paragraph 5.14.19 of the NPS EN-1 recognises that projects may give rise to substantial impacts on the surrounding transport infrastructure and refers to the need for applicants to mitigate these impacts, including during the construction phase of the development as well as by enhancing active, public and shared transport provision and accessibility.
- 5.4.116 Paragraph 5.14.22 of the NPS EN-1 states that development should only be refused where there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision.
- 5.4.117 Policy 31 of the SELLP (Climate Change and Renewable and Low Carbon Energy), requires proposals for renewable energy facilities and associated infrastructure to not cause harm to highway safety and PRoW.
- 5.4.118 Policy 33 (Delivering a More Sustainable Transport Network) of the SELLP set out the requirements for assessing and managing construction traffic noting that this should not undermine the functioning of the existing highway network and should support a sustainable transport approach.
- 5.4.119 A Transport Statement has been undertaken for the Scheme in its entirety to assess the impacts as a result of an increase in traffic during construction.
- 5.4.120 The accompanying EAR summarises the assessment baseline for traffic movement, providing a detailed assessment of impacts and effects during the construction and operation phases of development.
- 5.4.121 Mitigation measures are set out within the Outline CEMP and Outline CTMP to manage transport impacts during the construction phase of development.
- 5.4.122 There were no likely significant effects to identified receptors resulting from traffic movements during the operational phase.
- 5.4.123 This Section 37 Application is therefore compliant with the NPPF paragraphs 115 and 105, NPS EN-1, and Policy 31 and Policy 33 of the SELLP.

Amenity

- 5.4.124 The NPPF is supportive of development that protects health and the quality of life of local communities, as well as development that is safe, inclusive and promotes health and wellbeing. Paragraph 96 of the NPPF sets out that planning decisions should aim to create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.
- 5.4.125 Policy 2 (Development Management) and Policy 3 (Design of New Development) of the SELLP require that development does not significantly impact on neighbouring land uses from noise, odour, disturbance or visual intrusion. Criteria 2 of Policy 31B in the SELLP refers specially to residential amenity in this regard.
- 5.4.126 Policy 30 (Pollution) of the SELLP requires development proposals will not be permitted where, taking account of any proposed mitigation measures, they would

lead to unacceptable adverse impacts upon the health and safety of the public, the amenities of the area, or the natural, historic and built environment. Unacceptable adverse impacts include those caused by amongst other things, noise including vibration.

- 5.4.127 Policy 32 of the SELLP (Community, Health and Well-being) requires that development contributes reducing health inequalities and improving the health and well-being of communities. The policy states that development will be permitted where it protects and enhanced existing public rights of way and creates new links to the rights of way network.
- 5.4.128 Policy 30 requires planning applications to include an assessment of the impact on amenity of existing uses detailing mitigation measures to be provided where necessary
- 5.4.129 A Noise and Vibration Assessment was undertaken for the Scheme, which considered the Scheme in its entirety, identifying aspects that were specific to the Section 37 4ZM Overhead Line Works
- 5.4.130 The accompanying EAR summarises the assessment baseline for noise and vibration, providing a detailed assessment of impacts and effects during the construction and operation phases of development.
- 5.4.131 Noise and vibration impacts during construction will be controlled through measures identified in the Outline CEMP.
- 5.4.132 There are no operational noise and vibration impacts expected.
- 5.4.133 This Section 37 Application is therefore compliant with the NPPF paragraph 96, and Policies 2, 30 and 32 of the SELLP.

Air Quality

- 5.4.134 Paragraph 198 of the NPPF states that *“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.”*
- 5.4.135 Paragraph 201 of the NPPF states that *“The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities”*
- 5.4.136 Paragraph 5.8.41 of NPS EN-1 requires that development helps to improve local environmental conditions such as air quality.
- 5.4.137 Policy 30 (Pollution) of the SELLP states that development will be refused if, even with mitigation, they would cause unacceptable harm to public health and safety, local amenity, or the natural, historic, or built environment. This includes adverse impacts arising from air quality such as fumes and odour.
- 5.4.138 An Air Quality Assessment was undertaken which considered the Scheme in its entirety.

- 5.4.139 The accompanying EAR summarises the assessment baseline for air quality, providing a detailed assessment of impacts and effects during the construction and operation phases of development.
- 5.4.140 There is no significant effects on air quality during the construction or operational phases of development. Measures to control air quality during construction are included within the Outline CEMP.
- 5.4.141 This Section 37 Application is therefore compliant with the NPPF paragraphs 198 and 201, NPS EN-1, and Policy 30 of the SELLP.

Arboriculture

- 5.4.142 Paragraph 187 of the NPPF states that *“Planning policies and decisions should contribute to and enhance the natural and local environment by: [...] b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.”*
- 5.4.143 Policy 2 (Development Management) of the SELLP states that a proposal requiring planning permission will be permitted provided that sustainable development considerations are met, including amongst other things, and impact on trees.
- 5.4.144 Policy 3 (Design of New Development) of the SELLP states that proposals should demonstrate the incorporation of existing hedgerows and trees, and the provision of appropriate new landscaping.
- 5.4.145 An Arboricultural Impact Assessment was undertaken for the Scheme, which considered the Scheme in its entirety. Specifically, within the S37 4ZM Overhead Line Works boundary, there are six individual trees, nine tree groups, and two hedgerows.
- 5.4.146 The accompanying EAR summarises the assessment baseline for trees, providing a detailed assessment of impacts and effects during the construction and operation phases of development, concluding that there would be no significant effects to arboriculture.
- 5.4.147 No high-quality trees or hedgerow features are to be removal or partial removal to facilitate the S37 4ZM Overhead Line Works. There is the potential for impacts to one moderate quality tree group and one low quality tree group that might require full or partial removal during construction of the S37 4ZM OHL Works. Measures are included within the Outline CEMP to retain where practicable or replace vegetation and trees. Replacement planting will be planted as close by as practicable and sympathetic to local habitat types to ensure high quality biodiverse character.
- 5.4.148 During operation no significant effects are expected.
- 5.4.149 This Section 37 Application is therefore compliant with the NPPF paragraph 187, and Policies 2 and 3 of the SELLP.

Cumulative Impact of Construction and Operation of the Scheme

- 5.4.150 Paragraph 198 of the NPPF states that planning decisions should:
- “Ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.”
- 5.4.151 Paragraph 4.1.5 of NPS EN-1 states that when considering any proposed development, the following should be taken into account, in particular when weighing its adverse impacts against its benefits:
- “- Its potential benefits including its contribution to meeting the need for the Clean Power 2030 Mission and net zero, energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits;
- Its potential adverse impacts, including on the environment, and including any long term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy.”
- 5.4.152 This need to assess cumulative effects is mirrored in NPS EN-5.
- 5.4.153 Policy 31 (Climate Change and Renewable and Low Carbon Energy) of the SELLP sets out the need for relevant development to include an assessment of cumulative effects.
- 5.4.154 A Cumulative Effects Assessment was undertaken for the Scheme, which included the S37 4ZM OHL Works where relevant. This considered the potential for the Scheme to result in significant inter and intra project effects.
- 5.4.155 The accompanying EAR summarises the assessment baseline for assessing cumulative impacts and provides an assessment of the potential impacts and effects during the construction and operation phases of development.
- 5.4.156 Two NSIPs have been assessed which interface directly with the Scheme, including ODOV for which this S37 Application is seeking to deliver a connection to the network, and the Meridian Solar Farm. The closest planning application to the S37 4ZM Overhead Line Works is Land to the East of Surfleet Bank and West of Woad Farm, Spalding (PL/0065/24 and H17-1097-23).
- 5.4.157 The EAR concludes that significant intra project environmental effects, or cumulative environmental effects as a result of the S37 4ZM OHL Works in combination with other committed developments, are not expected.
- 5.4.158 Mitigation measures would be secured through the Outline Soil Management Plan and Outline CEMP to reduce any environmental impacts and avoid significant environmental effects, during the construction phase of development. In addition, construction traffic would be managed through the CTMP that would introduce control measures for traffic control and works.
- 5.4.159 This Section 37 Application is therefore compliant with the NPPF paragraph 198, NPS EN-1, NPS EN-5, and Policy 31 of the SELLP.

6. Conclusion

This Statement has been prepared in support of an application for consent under Section 37 of the Electricity Act 1989 for the S37 4ZM Overhead Line Works, together with a direction for deemed planning permission under Section 90(2) of the Town and Country Planning Act 1990.

The application forms part of the wider Scheme, as defined in Table 1.3 of this Statement, required to facilitate the timely connection of the consented ODOW project to the transmission system by 2030.

6.1 Overall Conclusion

- 6.1.1 The evidence presented throughout this Statement, alongside the accompanying EAR and supporting technical documentation, demonstrates that the S37 4ZM Overhead Line Works is both a necessary and appropriate development, and meets the relevant national and local planning policy tests.
- 6.1.2 The S37 4ZM Overhead Line Works are required to enable the delivery of up to 1.5 GW of renewable energy, making a substantial and time-critical contribution to national decarbonisation objectives and the delivery of the UK Government's Clean Power 2030 of 50 GW by 2030. The ODOW would account for 3% of this target.

6.2 Form B Responses from the LPAs

- 6.2.1 It is considered that some of concerns raised through the Form B consultation process, particularly by LCC, are misconceived. In particular, they arise from a misunderstanding of the S37 4ZM Overhead Line Works and wider Scheme, and do not take into account the status of the Scheme as a standalone and functionally independent project.
- 6.2.2 LCC's Form B response proceeds from the incorrect premise that the S37 4ZM Overhead Line Works are part of the same "project" as the Grimsby to Walpole DCO for EIA purposes. However, as demonstrated throughout this Statement, the S37 Overhead Line Works and associated TCPA application comprise a standalone Scheme, which are required to meet a distinct and time-critical connection requirement. The delivery and operation of the S37 4ZM Overhead Line Works or any other element of this Scheme, does not rely on the Grimsby to Walpole DCO. Case law indicates, therefore, that since the Scheme will deliver a standalone fully functioning substation and connection for ODOW, without reliance upon the Grimsby to Walpole DCO, the Scheme and the Grimsby to Walpole DCO should not be considered to be a single "project" for EIA purposes.
- 6.2.3 Proceeding from this incorrect premise has also led to an overstatement of potential environmental effects in LCC's Form B response, particularly in relation to cumulative impacts. It is considered that when assessed on the correct basis, the evidence confirms that only limited significant environmental effects arise. Accordingly, limited weight should be afforded to those concerns insofar as they rely on an incorrect understanding of the nature and scope of the Scheme.

- 6.2.4 It is further demonstrated that sufficient information is available for determination. Should further clarification be required, a re-consultation could be undertaken by the SoS.

6.3 Compliance with Planning Policy

- 6.3.1 The S37 4ZM Overhead Line Works have been assessed against the relevant planning policy criteria, in accordance with the relevant NPSs, NPPF, and local Development Plan documents, as set out in Section 5 of the Statement. This assessment of planning policy compliance has been considered in the context of the other elements of the Scheme.
- 6.3.2 The national policy requirements weigh significantly in favour of the S37 4ZM Overhead Line Works including the significant national need for new transmission system infrastructure to support offshore wind generation and wider decarbonisation, as established in national policy including the NPPF and NPS's EN-1 and EN-5. The S37 4ZM Overhead Line Works directly responds to this need by enabling the connection of the consented ODOW DCO.
- 6.3.3 The delivery of the ODOW connection by 2030 is critical. The S37 4ZM Overhead Line Works are essential to facilitate the connection within a fixed and constrained programme. Any delay would defer the delivery of substantial volumes of renewable electricity and undermine national policy objectives relating to climate change and energy security.
- 6.3.4 The ODOW DCO documents confirm that the Order Limits include land in the vicinity of the Spalding Tee-Point as part of the assessed connection corridor, and therefore the principle of a connection in this location is considered to be approved in principle through its development consent.
- 6.3.5 The S37 4ZM Overhead Line Works meet the spatial strategy and sustainable development objectives of the Development Plan, particularly in relation to supporting critical infrastructure provision necessary to meet national and regional energy demand and facilitating the transition to a low-carbon economy.
- 6.3.6 The S37 4ZM Overhead Line Works would not give rise to any unacceptable impacts. Any potential impacts have been identified, and measures are proposed to ensure that these are appropriately mitigated during both the construction and operational phases of development. This includes in relation to landscape and visual effects, temporary construction impacts and the loss of agricultural land. Any potential impacts would be localised, temporary or minor in nature and do not conflict with the overarching objectives of the NSP's, NPPF and adopted Development Plan.
- 6.3.7 This is demonstrated in the supporting environmental appraisals, which conclude that the S37 4ZM Overhead Line Works would not give rise to likely significant environmental effects, either alone or cumulatively, and that any identified effects are capable of being effectively mitigated through measures embedded into the design and secured by condition.
- 6.3.8 Overall, the approach to consenting and environmental assessment is lawful and proportionate and does not represent any inappropriate segmentation of development. It is concluded that the S37 4ZM Overhead Line Works are compliant with the relevant national and local planning policies tests.

6.4 Planning Balance

- 6.4.1 The S37 4ZM Overhead Line Works would have very limited, localised temporary effects, including construction disturbance and some visual change, all of which can be effectively mitigated, with no significant residual effects identified.
- 6.4.2 In considering the planning balance, these limited impacts are outweighed by the clear benefits of the S37 4ZM Overhead Line Works, including connecting the consented ODOW to the transmission system, supporting net zero and Clean Power 2030 objectives, and strengthening energy security.

6.5 Summary

- 6.5.1 In considering the above it is concluded that the S37 4ZM Overhead Line Works meet the required planning policy tests and material considerations, and that any potential harm is outweighed by the benefits of the Scheme.
- 6.5.2 Accordingly, it is respectfully requested that the SoS grants consent under Section 37 of the Electricity Act 1989 for the S37 4ZM Overhead Line Works together with a direction under Section 90(2) of the Town and Country Planning Act 1990 that planning permission is deemed to be granted, subject to appropriate conditions.

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- Ref 17 Lincolnshire County Council (2016). Lincolnshire Minerals and Waste Local Plan, Core Strategy and Development Management Policies [online]. Available at: <https://www.lincolnshire.gov.uk/downloads/file/2361/core-strategy-and-development-management-policies> [Access 19 June 2026]
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Appendices

Appendix A

National Grid's Response to LCC's Consultation Responses

Consultee	Summary of Main issues Raised	Identified unavailable information	National Grid Response, including Proposed Resolution via Conditions
Statutory Bodies			
Historic England	No likely significant effects expected in respect of the historic environment; assuming that the SoS determines the S37 Application does not require an EIA.	Welcome that a Non-statutory Environmental Assessment Report (EAR) including heritage matters is expected with the S37 Application.	This response is noted. A request for a Screening Decision from the Secretary of State forms part of this submission. This is supported by a Report to Inform the Screening Decision and Environmental Appraisal Reports set out the further rationale as to why each respective component of S37 works would not result in likely significant effects upon the historic environment. The EAR is supported by a Historic Environment Desk Based Appraisal /DBA.
Natural England	Reviewed ESR. Full assessments not provided limiting NE's ability for a detailed response.	Some ecological baseline surveys.	<p>Detailed information is submitted in support of this S37 application, including habitat and protected species survey reports and the HRA Stage 1 Screening Assessment.</p> <p>Comprehensive ecological surveys have been undertaken to inform design development of the Scheme and the associated management and mitigation measures.</p> <p>The ecological impacts of the S37 works are assessed in the Environmental Assessment Report (EAR), while habitat and protected species survey reports include:</p> <ul style="list-style-type: none"> • Habitat Classification Survey Report; • Great Crested Newt Survey Report; • Breeding Bird Survey Report; • Non-breeding Birds Survey Report; • Badger Survey Report; • Bat Survey Report,

Consultee	Summary of Main issues Raised	Identified unavailable information	National Grid Response, including Proposed Resolution via Conditions
			<ul style="list-style-type: none"> • Otter and Water Vole Survey Report; and • Aquatic Survey Results Report. <p>A BNG Assessment is being produced specifically for those elements of the Scheme which require consent under the Town and Country Planning Act 1990 /Substation Works.</p> <p>A Habitat Regulations Assessment Stage 1 Screening Assessment has been undertaken which considers the Scheme in its entirety, inclusive of two specific components of S37 works. The HRA Stage 1 Screening Assessment is submitted alongside the EAR in support of the S37 consent application. The potential impact pathways considered in the HRA Stage 1 Screening Assessment include loss of functionally linked habitat, disturbance displacement, injury/mortality, changes in water quality and quantity, barriers to movement and emissions. Following an appraisal of the Habitats Sites regarding the relevant impact pathways, it has been concluded that Likely Significant Effects (LSE) of the Scheme can be excluded in relation to all pathways. Therefore, all elements of the Scheme were screened out from a more detailed Appropriate Assessment.</p> <p>An Environmental Statement is not intended to be produced as the S37 works /and the wider Scheme are not considered EIA development.</p>
	<p>Design, Control and Mitigation Measures - No discussion of monitoring to ensure the efficacy of the management plans in mitigation of impacts in the ESR.</p>	<p>This should be considered as discussed in the targeted consultation carried out between 18 November and 19 December 2025 Response.</p>	<p>Initial proposals for monitoring measures during construction are included within the Outline Construction Management Plan (OCEMP) which will be submitted in support of the S37 consent applications. It is expected that the final detail of the CEMP can be subject to condition.</p> <p>A Landscape and Ecology Management Plan (LEMP) is also intended to be developed alongside the detailed design, inclusive of measures to ensure successful establishment of habitats</p>

Consultee	Summary of Main issues Raised	Identified unavailable information	National Grid Response, including Proposed Resolution via Conditions
			<p>impacted by the construction of the S37 works to be reinstated. The approval of the LEMP and compliance with the measures it includes can/will be secured by condition.</p>
	<p>Cumulative Assessment Provisional assessments of cumulative impacts from other projects noted. Note: NE will make detailed comments once the full assessments have been submitted.</p>	<p>NE say it would be useful to see the provisional assessments mapped spatially and temporally to aid a review of the impacts from construction and operation to enable a clear depiction of impacts for a review of the assessment.</p>	<p>A stand alone Cumulative Effects Assessment considers the Scheme in its entirety, inclusive of the specific components of S37 works.</p> <p>It is also noted that the HRA Stage 1 Screening Assessment also considers in-combination effects. These assessments will be submitted in support of the S37 consent applications.</p>
	<p>Internationally Designated Sites Noted that Habitats Regulations Assessment (HRA) remains outstanding; therefore, detailed comments from NE to follow.</p>	<p>Impacts from lighting to be assessed. NE suggest using nocturnal bird survey data to inform the assessment within the HRA.</p> <p>They suggest figures depicting bird survey data and lighting thresholds are useful in reviewing the impact assessment.</p> <p>NE also note that noise sensitive receptors will be assessed, such as from any percussive piling during construction. They recommend using the bird survey data to inform the assessment of impacts to mobile features of</p>	<p>The supporting information to this S37 application includes a habitat and protected species survey reports and the HRA Stage 1 Screening Assessment. The latter includes assessment of potential disturbance due to lighting impacts and has also been informed by a robust suite of bird survey data.</p> <p>There are no operational lighting requirements for the S37 works. Lighting associated with these components will be limited to temporary construction task/security lighting.</p> <p>In addition to the HRA Stage 1 Screening Assessment, the ecological impacts of the S37 works are considered further within the EAR and includes potential disturbance due to lighting, noise and other potential indirect impacts.</p> <p>The OCEMP includes measures to minimise obtrusive light spillage and Best Practicable Means (BPM) to reduce noise and vibration. It is envisaged that the final detail of the OCEMP can be subject to condition.</p>

Consultee	Summary of Main issues Raised	Identified unavailable information	National Grid Response, including Proposed Resolution via Conditions
		designated sites from noise in the HRA.	
	Soils and Agricultural Land	No outright commitment to return any temporarily impacted soils to their original Agricultural Land Classification (ALC) grade, should be stated in the documents and Soil Management Plan (SMP).	The accompanying Outline Soil Management considers the Scheme in its entirety, inclusive of the specific components of S37 works. The details of the final Soil Management Plan can/will be subject to condition.
	Air Quality Standing Advice: NE's statutory advice and is a material consideration	Natural England advises that the potential for air quality impacts needs to be assessed.	An Air Quality Assessment accompanies this application. It considers the Scheme in its entirety, inclusive of the two specific components of S37 works. It is noted that vehicular tail-pipe emissions released by construction vehicles associated with the Scheme using the local road network are screened out of the assessment. This is based upon a review of the construction traffic data supplied by the Contractor. Specifically, the predicted change in traffic flows during the construction phase will not exceed the screening thresholds outlined in the relevant assessment guidance. Therefore, a detailed air quality assessment is not required.
Environment Agency	The submitted Flood Risk Assessment (FRA) does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-	Assessment of suitable mitigation measures against the residual risk of a breach in the design flood event and an overtopping event in the 1 in 1000-year event.	The S37 works result in a net increase of three open lattice pylons within the defended floodplain. These are considered to have a negligible impact upon flood risk within the defended floodplain. As a result, the Form B Environmental Summary Report submitted as part of the Form B process did not set out a detailed FRA for those elements. A detailed FRA accompanies this submission, and has been submitted as part of the TCPA application to South Holland District Council for the Substation Works. This detailed FRA acknowledges the S37 works but focuses on the Substation

Consultee	Summary of Main issues Raised	Identified unavailable information	National Grid Response, including Proposed Resolution via Conditions
	specific flood risk assessment checklist.		<p>Works component of the Scheme. It has been informed by prior engagement with the Environment Agency.</p> <p>The detailed FRA complies with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist. Hydraulic modelling of the River Welland has been undertaken to support the detailed FRA. This includes the 1 in 1000 year plus climate change (design flood event) overtopping scenario and 1 in 1000 year plus climate change breach scenario.</p>
	The proposed development may require an Environmental Permit from the Environment Agency for works within 8 metres of the River Welland or within the floodplain of a main river, which is separate from and in addition to planning permission.	<p>A Flood Risk Assessment satisfactory to the Environment Agency.</p> <p>Details confirming whether the works fall within areas requiring an Environmental Permit, and if so, whether an application has been made.</p>	<p>As outlined above, a detailed FRA has been prepared in respect of the wider Scheme, which has been informed by prior engagement with the Environment Agency. This is submitted as part of the S37 applications.</p> <p>It is noted that certain works associated with the Exempt Overhead Line works component of the Scheme are in close proximity to the River Welland. However, these are distinct from the S37 works and Substation Works. As such, they do not form part of the S37 consent applications or the application for planning permission.</p> <p>If required, an Environmental Permit application would be submitted to the Environment Agency at the appropriate time.</p>
	Water voles are a legally protected species under the Wildlife and Countryside Act 1981. Records indicate water voles are likely to be present in nearby ditches and watercourses, meaning the Environment	Pre-construction water vole surveys.	No evidence of Water voles has been found in the surveys undertaken to date. National Grid will ensure full compliance with the necessary Natural England licensing requirements in respect of water vole. Surveys will conclude in summer 2026, a supplementary report will be submitted later in the season.

Consultee	Summary of Main issues Raised	Identified unavailable information	National Grid Response, including Proposed Resolution via Conditions
	<p>Agency would object to the development unless a planning condition is imposed requiring appropriate protection and mitigation. The development is only considered acceptable if impacts on water voles are avoided or adequately mitigated through a legally compliant protection strategy, supported by national policy (NPPF), the NERC Act, and relevant local plan policies.</p>		
	<p>A sufficient buffer should be maintained between development, fencing, and any watercourse or ditch, with a minimum distance of 10 metres from the bank-top. Networks of undeveloped buffer zones can also assist wildlife in adapting to climate change and help restore watercourses to a more natural condition in line with the Anglian River Basin Management Plan.</p>		<p>The Outline CEMP includes measures to control potential impacts upon watercourses, including potential pollution. These measures include provision of suitable buffers as far as reasonably practicable. Appropriate buffers will be applied to protect watercourses and water quality - particularly against construction run-off and to support local biodiversity as described in the Anglian River Basin Management Plan. 10 m buffers will be applied where reasonably practicable. However, buffers may not be viable in all instances given that direct interaction with a number of existing watercourses is required to implement the Scheme.</p>

Consultee	Summary of Main issues Raised	Identified unavailable information	National Grid Response, including Proposed Resolution via Conditions
	<p>On this basis, the proposed development would be acceptable provided a planning condition is imposed requiring an agreed scheme to protect a 10-metre-wide ecological buffer zone, measured from the bank-top, along the River Welland and associated IDB-maintained drains.</p>		
Lincolnshire Wildlife Trust	<p>Comprehensive ecological baseline for all impacted areas assumed; noting that the site is in proximity to several protected sites, including The Wash SPA, SAC, Ramsar, and SSSI. Additionally, it should be ensured that the biodiversity metric includes details of how at least 10% biodiversity net gain (BNG) can be achieved with the creation of habitats at a realistic condition.</p>	<p>The Habitat Regulations Assessment (HRA) should include a detailed analysis of how the development will impact the protected sites, particularly the impact of the overhead lines on bird populations associated with the Wash and areas of functionally linked land.</p>	<p>Comprehensive ecological surveys have been undertaken to inform design development of the Scheme and the associated management and mitigation measures. The ecological impacts of the S37 works are assessed in the Environmental Assessment Report (EAR), while habitat and protected species survey reports include:</p> <ul style="list-style-type: none"> • Habitat Classification Survey Report; • Great Crested Newt Survey Report; • Breeding Bird Survey Report; • Non-breeding Birds Survey Report; • Badger Survey Report; • Bat Survey Report, • Otter and Water Vole Survey Report; and • Aquatic Survey Results Report. • A BNG Assessment is being produced specifically for those elements of the Scheme which require consent under the Town and Country Planning Act 1990 / Substation Works.

Consultee	Summary of Main issues Raised	Identified unavailable information	National Grid Response, including Proposed Resolution via Conditions
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Please see the previous response above in relation to the completion of a HRA Stage 1 Screening Assessment. This report specifically considers the Wash SPA, SAC and Ramsar.

Consultees

Peter Danks - Reading Agricultural Consultants	Lack of consideration of the likely impacts on the affected farms. Land holdings (as a receptor) are considered to have a low sensitivity. There is no justification given for this low rating.	<i>Given the sensitivity of the affected farms to the works associated with the Scheme, a commitment needs to be made for close liaison with the affected farming landowners and tenants to minimise the adverse impacts on cropping, irrigation and field drainage. In particular, they should be consulted on the location of pylons within fields to minimise impacts on cultivations and irrigation.</i>	<p>As a whole, land impacted by the Scheme is predominantly arable, with small sections of woodland and grassland. Given this predominant land use, land holdings, as a receptor, are considered to have a low sensitivity. This is based upon the Design Manual for Roads and Bridges (DMRB) LA112 - Population and Human Health, which is the relevant guidance for the assessment of impacts upon land holdings, as receptors, draws upon. The details within the OSMP can be carried out by condition.</p> <p>As was stated in the Environmental Summary Report, land required temporarily would be reinstated to its pre-construction condition and impacts on individual agricultural businesses would be dealt with through financial compensation in accordance with the compensation code (which would include consideration of any active agri-environment and/or forestry/woodland schemes). An Agricultural Land Classification (ALC) Report accompanies this application.</p> <p>Mitigation and management measures for all soil handling operations are set out in the OSMP, using soil data from the ALC surveys which have been completed to inform the report.</p> <p>The OCEMP sets out general requirements relating to communications and engagement with affected parties and management of potential amenity impacts. National Grid are in dialogue with affected landowners and will continue to liaise with these parties with the objective of minimising adverse impacts on operations as far as practicable.</p>
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Consultee	Summary of Main issues Raised	Identified unavailable information	National Grid Response, including Proposed Resolution via Conditions
Lincolnshire Police	No objections	N/A	This response is noted.
Parish Council			
Weston Parish Council	Concern around predetermination. Suggests determination of the OHL works risk prejudicing the outcome of the associated application.		<p>The S37 Overhead Line Works are components of the wider Scheme, which includes the Substation Works. Delivery of the Scheme in its entirety is contingent upon all necessary consents being secured.</p> <p>There is no material risk of stranded assets. The substation will be consented and taken forward regardless of the DCO, which will again be consented on its own merits.</p>
	Concern around segmented approach /salami-slicing).		<p>The S37 Overhead Line Works are components of the wider Scheme, which includes the Substation Works. The Scheme in its totality is a standalone development to enable connection of the Outer Dowsing Offshore Wind Farm to the national electricity transmission system.</p> <p>The Grimsby to Walpole Development Consent Order /DCO) is a related but separate development, for which the DCO application will be submitted separately in 2027. This will be supported by an Environmental Statement which considers all aspects of the Grimsby to Walpole Project and includes robust assessment of potential cumulative effects with other developments.</p>
	Concern around failure to require EIA.		<p>In accordance with regulation 10 and 11 of The Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2017, a request for a Screening Decision from the Secretary of State for the Energy Security and Net Zero is made alongside this application and is supported by the Report to Inform Screening Decision.</p> <p>An EIA screening request was made to SHDC under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in relation to the Substation Works, which are</p>

Consultee	Summary of Main issues Raised	Identified unavailable information	National Grid Response, including Proposed Resolution via Conditions
			<p>subject a separate application for consent to the S37 works. SHDC determined that these works do not constitute EIA development.</p>
	<p>Conflict with NPPF provisions including Para 180 /Conserving and Enhancing the Natural environment), Para 187 /BMV Agric Land), Para 174 /Recognising Intrinsic Character of the Countryside) and Para 185 /Cumulative Impacts).</p>		<p>The NPPF has been a key consideration in the preparation of the Environmental Assessment Report and supporting documentation accompanying this S37 Application. Please refer to the Environmental Assessment Report, Agricultural Land Classification Report, Landscape and Visual Appraisal and the Cumulative Effects Assessment Report for further information.</p>
	<p>Failure of Landscape and Visual assessment - concern that the assessment does not meet the standard of a robust LVIA required by GLVIA3.</p>		<p>A Landscape and Visual Appraisal accompanies this application and considers the Scheme in its entirety, inclusive of the specific components of S37 works. The Landscape and Visual Appraisal has been undertaken in line with relevant guidance including the Landscape Institute and Institute for Environmental Management and Assessment /Institute of Environmental Management and Assessment (IEMA)(2013) Guidelines for Landscape and Visual Impact Assessment - 3rd Edition (GLVIA3)</p>
	<p>Concerns around use of S37 and deemed planning permission and suggests that this ‘circumvents the full application of local planning control’, limits community engagement and risk approval of ancillary works without proper scrutiny.</p>		<p>Section 37 is a statutory consenting process and does not circumvent scrutiny or public engagement. The application is subject to statutory consultation, full environmental assessment, and determination by the Secretary of State, who may impose conditions. Any deemed planning permission for ancillary works forms part of the same assessed and consulted-upon scheme and is subject to appropriate controls. As set out throughout this Statement this response reflects a misunderstanding of how the Scheme should be defined in EIA terms.</p>

Consultee	Summary of Main issues Raised	Identified unavailable information	National Grid Response, including Proposed Resolution via Conditions
	<p>Concern that the application may rely on compulsory purchase which raises concerns around certainty and delivery of the scheme and appropriateness of granting consent.</p>		<p>The use of compulsory purchase powers would be subject to a separate statutory process and approval; compulsory purchase is subject to the test of being a compelling case in the public interest: there will also need to be sufficient certainty that consent for the scheme will be granted. The Section 37 application is assessed on its own merits, including deliverability and need, and, similarly, the Secretary of State would only grant consent where there is sufficient certainty that the scheme can be implemented appropriately. The issuing of any planning consents will be withheld until such time as the Compulsory Purchase Order (CPO) is formally confirmed.</p>

LCC's Internal Bodies

LCC Ecology	<p>Presence of sites designated for highly mobile species such as birds.</p>	<p>Identify potential impact pathways for these sites and their interest features and present an analysis of potential impacts, along with associated avoidance and mitigation measures in the Environmental Statement.</p>	<p>A Habitat Regulations Assessment Stage 1 Screening Assessment has been undertaken which considers the Scheme in its entirety, inclusive of two specific components of S37 works. The HRA Stage 1 Screening Assessment is submitted alongside the EAR in support of the S37 consent application. The potential impact pathways considered in the HRA Stage 1 Screening Assessment includes loss of functionally linked habitat, disturbance displacement, injury/mortality, changes in water quality and quantity, barriers to movement and emissions. Following an appraisal of the Habitats Sites regarding the relevant impact pathways, it has been concluded that Likely Significant Effects (LSE) of the Scheme can be excluded in relation to all pathways. Therefore, all elements of the Scheme were screened out from a more detailed Appropriate Assessment.</p>
	<p>Cumulative: There are several development proposals of varying scales in the vicinity of the</p>	<p>The combined implications of impacts such as habitat loss, habitat fragmentation and disturbance of species will</p>	<p>A stand-alone Cumulative Effects Assessment supports this application and considers the Scheme in its entirety, inclusive of the components of the S37 works. This assessment considers potential inter-project cumulative effects, which could occur</p>

Consultee	Summary of Main issues Raised	Identified unavailable information	National Grid Response, including Proposed Resolution via Conditions
	proposal. These range from small scale housing developments to NSIP scale energy developments.	need careful consideration in the Environmental Statement.	where a single receptor experiences effects from a number of separate developments, including the Scheme and other committed developments in the Weston Marsh area. It is also noted that the HRA Stage 1 Screening Assessment also consider in-combination effects. These assessments are submitted in support of this S37 application. An Environmental Statement has not been prepared as the works are not considered EIA development.
	Habitats Regulations Assessment (HRA) may be required. An HRA Screening Report is being prepared.	HRA, if required	See above response in relation to the completion of a HRA Stage 1 Screening Assessment.
	BNG Assessment. No details of how any gains will be achieved are presented at this stage.	The proposals will require a measurable biodiversity net gain (BNG) of at least 10%. A MoRPH assessment will be required to calculate baseline river units where watercourses (with the exception of ditches) are present in or adjacent to the proposed application boundary.	S37 works are not subject to mandatory requirements to deliver a 10% gain in net biodiversity value. A BNG Assessment is being produced specifically for those elements of the Scheme which require consent under the Town and Country Planning Act 1990. This includes River Condition Assessment data. The S37 works have however been designed and planned to minimise impacts upon existing habitats. Habitats which are directly impacted by the temporary construction works specifically associated with the S37 works, and which are outside of the land required permanently (e.g. that within new pylon footprints), would be reinstated following the completion of construction.
LCC Highway Authority and Lead Local Flood Authority	Not expected to have an unacceptable impact on highway safety or a severe residual cumulative impact on the	Highways impact, <u>there is no technical information on which to make an assessment.</u> Would expect a TA including outline of construction	The Transport Statement is submitted in support of the S37 application. The Outline Construction Traffic Management Plan will also be submitted in support of the two S37 consent applications. It is envisaged that the agreement of the final CTMP can/will be

Consultee	Summary of Main issues Raised	Identified unavailable information	National Grid Response, including Proposed Resolution via Conditions
	<p>local highway network or increase surface water flood risk. Assumptions: The detail of the transport impact and flood risk impact will be covered in Transport Assessment(s) (TA) and Flood Risk Assessments (with the / this TCPA to SHDC).</p>	<p>activities, traffic, traffic routing, likely impacts etc. and mitigation required.</p>	<p>subject to condition requiring discharge prior to commencement of works.</p>
<p>LCC Historic Places</p>	<p>Insufficient specific information on the archaeological potential for the site and the extent of impact to buried archaeological remains from the proposed development. Recommendation: Heritage Impact Assessment (HIA).</p>	<p>HIA to be informed by Geophysics Survey, Geoarchaeological Assessment and Trial Trench Archaeological Evaluation in order to properly assess the site's significance.</p>	<p>A Historic Environment Desk Based Appraisal (DBA) is provided in support of the necessary consent applications, which considers the Scheme in its entirety, inclusive of the specific components of S37 works. The results of the desk-based research, aerial photographic, geoarchaeological and geophysical surveys evidence collated to inform the Historic Environment DBA were discussed with Lincolnshire County Council's Archaeological Advisor on 16th and 20th April. A number of surveys remain ongoing, including trial trenching and geophysical surveys. It is envisaged that the details of required surveys can/will be secured by condition.</p>
<p>Minerals & Waste</p>	<p>No minerals safeguarding objections to the proposals or concerns about suggested Waste Management protocol.</p>	<p>N/A</p>	<p>This response is noted.</p>

Appendix B

Confirmation from Consultees on the Scope of this S37 Submission's supporting documentation

From: [REDACTED]@naturalengland.org.uk>
Sent: 08 May 2026 14:18
To: [REDACTED]
Subject: RE: Weston Marsh Section 37 Form B: NE's Response to LCC's Consultation

Hi [REDACTED]

Following our call on 06/05/26 and as listed below, I can confirm based on the supporting information intending to be submitted we are satisfied at this stage in the application process, the scope of documents proposed for submission to DESNZ is appropriate for the project.

Kind regards

[REDACTED]

From: [REDACTED]@atkinsrealis.com>
Sent: 08 May 2026 08:22
To: [REDACTED]@naturalengland.org.uk>
Subject: Weston Marsh Section 37 Form B: NE's Response to LCC's Consultation

Dear [REDACTED],

Thank you again for taking the time on Wednesday to discuss the comments Natural England provided to Lincolnshire County Council on 13 April in response to the Form B consultation as part of the Section 37 process.

The purpose of the call was to talk through the points raised and to explain how those matters are to be addressed within the technical assessments and supporting documents that will form part of the forthcoming Section 37 submission. The tabulated response previously submitted to LCC provided the basis for that discussion.

It was helpful to understand NE's position in more detail, and to discuss how a standard and proportionate approach to the application's assessments has been followed, with the relevant matters to be considered by the Secretary of State through the formal submission and examination process.

As explained during the call, the detailed suite of supporting information to be submitted with the applications would address many of your comments, including, but not limited to the following:

- S37 Environmental Appraisal Reports – inclusive of assessment of ecological impacts
- Supporting suite of survey reports, including:
 - Breeding Birds Survey Report
 - Non-Breeding Birds Survey Report
 - Bat Survey Report
 - Otter and Water Vole Survey Report
 - Badger Survey Report (Confidential)
 - Aquatic Ecology Survey Report
 - Great Crested Newt Survey Report
- Habitat Regulations Assessment – Stage 1 Screening
- Outline Construction Environment Management Plan

- Cumulative Effects Assessment

We also noted that whilst Biodiversity Net Gain is not a requirement for the S37 works, we have undertaken a BNG Assessment for the Substation Works, which will be subject to a separate planning application.

I would be grateful if you could confirm by **midday 08/05**, if based on our discussion the issues in the comments raised have been alleviated and whether you are content that the scope of documents proposed for submission to DESNZ is appropriate for the project, or if there are outstanding concerns that you consider remain unresolved at this stage.

I appreciate this is a short timeframe to reply.

Many thanks for your reply.

Kind regards

[Redacted]
Associate Town Planner
[Redacted]

Tel: [Redacted]

AtkinsRéalis



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From: [REDACTED]@environment-agency.gov.uk>
Sent: 18 June 2026 15:34
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Weston Marsh Section 37 Form B: The EA's Response to LCC's Consultation

Dear [REDACTED],

Thank you for your email.

Further to the meeting yesterday, regarding the objection to the S37 application. We confirm that we accept in principle the way forward you have proposed to resolve the issues we highlighted in our consultation response. However, we will be unable to remove our objection until we have had an opportunity to review all the submitted information in detail.

Kind regards

[REDACTED]
Planning Advisor
National Infrastructure team
Growth, Permitting & Monitoring
[REDACTED]
[REDACTED]



For homes and habitats



From: [REDACTED]@atkinsrealis.com>
Sent: 18 June 2026 11:09
To: [REDACTED]@environment-agency.gov.uk>; [REDACTED]@environment-agency.gov.uk>
Cc: [REDACTED]@arup.com>; [REDACTED]@arup.com>
Subject: Weston Marsh Section 37 Form B: The EA's Response to LCC's Consultation

Dear [REDACTED],

Thank you again for taking the time on Wednesday to discuss the comments the Environment Agency provided to Lincolnshire County Council on 21 April in response to the Form B consultation as part of the Section 37 process.

The purpose of the call was to talk through the points raised and to explain how those matters are to be addressed within the technical assessments and supporting documents that will form part of the forthcoming Section 37 submission. A tabulated response previously submitted to LCC provided the basis for that discussion.

It was helpful to understand the EA's position in more detail, and to discuss how a standard and proportionate approach to the application's assessments has been followed, with the relevant matters to be considered by the Secretary of State through the formal submission and examination process.

As explained during the call, the detailed suite of supporting information to be submitted with the applications should address many of your comments, including, but not limited to the following:

Flood Risk

- Submission of a detailed Flood Risk Assessment (FRA) to support the Scheme.
- Inclusion of hydraulic modelling of the River Welland within the FRA, covering:
 - o 1 in 1000-year + climate change overtopping scenario
 - o 1 in 1000-year + climate change breach scenario.

This will demonstrate compliance with site-specific flood risk assessment checklist.

Environmental Permitting

- Provision of details confirming whether an Environmental Permit is required
- Submission of an Environmental Permit application (if required)

Biodiversity

- Submission of water vole survey data.
- Water vole mitigation measures will be submitted if there is evidence of water voles surveyed.
- Confirmation of compliance with Natural England licensing requirements, as applicable.
- Submission of an Outline Construction Environmental Management Plan (OCEMP) including measures to:
 - o control impacts on watercourses
 - o prevent pollution
 - o protect water quality
 - o support biodiversity

Buffer Zones

- Provision of ecological buffer zones to protect watercourses and drains
- Implementation of 10m buffer zones where reasonably practicable.

I would be grateful if you could confirm by **CoP 18/06**, if based on our discussion you are content that the scope of documents proposed for submission to DESNZ is appropriate for the project, or if there are outstanding concerns that you consider remain unresolved at this stage.

I appreciate this is a short timeframe to reply. Please let me know if you have any queries.

Many thanks

██████████
 Associate Town Planner
 ██████████

Tel: ██████████

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From: [REDACTED]@lincstrust.co.uk>
Sent: 08 May 2026 14:46
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Weston Marsh Section 37 Form B: LWT's Response to LCC's Consultation

Dear [REDACTED],

Thank you for the email below, capturing the meeting earlier this week, as requested by yourselves.

I confirm that the list of documentation, and the approach to BNG set out below are appropriate, although not exhaustive.

I was undertaking recruitment interviews today, so was unable to meet a noon deadline.

Kind regards,

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



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From: [REDACTED]@atkinsrealis.com>
Sent: 08 May 2026 08:33
To: [REDACTED]@lincstrust.co.uk>
Cc: [REDACTED]@lincstrust.co.uk>
Subject: Weston Marsh Section 37 Form B: LWT's Response to LCC's Consultation

Dear [REDACTED],

Thank you again for taking the time on Wednesday to discuss the comments Lincolnshire Wildlife Trust provided to Lincolnshire County Council on 15 April in response to the Form B consultation as part of the Section 37 process.

The purpose of the call was to talk through the points raised and to explain how those matters are to be addressed within the technical assessments and supporting documents that will form part of the forthcoming Section 37 submission. The tabulated response previously submitted to LCC provided the basis for that discussion.

It was helpful to understand LWT's position in more detail, and to discuss how a standard and proportionate approach to the application's assessments has been followed, with the relevant matters to be considered by the Secretary of State through the formal submission and examination process.

As explained during the call, the detailed suite of supporting information to be submitted with the applications should address many of your comments, including, but not limited to the following:

- S37 Environmental Appraisal Reports – inclusive of assessment of ecological impacts
- Supporting suite of survey reports, including:
 - Breeding Birds Survey Report
 - Non-Breeding Birds Survey Report
 - Bat Survey Report
 - Otter and Water Vole Survey Report
 - Badger Survey Report (Confidential)
 - Aquatic Ecology Survey Report
 - Great Crested Newt Survey Report
- Habitat Regulations Assessment – Stage 1 Screening
- Outline Construction Environment Management Plan
- Cumulative Effects Assessment


We also noted that whilst Biodiversity Net Gain is not a requirement for the S37 works, we have undertaken a BNG Assessment for the Substation Works, which will be subject to a separate planning application.

I would be grateful if you could confirm by **midday 08/05**, if based on our discussion the issues in the comments raised have been alleviated and whether you are content that the scope of documents proposed for submission to DESNZ is appropriate for the project, or if there are outstanding concerns that you consider remain unresolved at this stage.

I appreciate this is a short timeframe to reply.

Many thanks for your reply.

Kind regards


Associate Town Planner

Tel: 

AtkinsRéalis

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Appendix C

Section 37 Overhead Line Works

Executive summary

This Stakeholder Consultation Record has been produced for the purpose of detailing National Grid Electricity Transmission's (National Grid) pre-application consultation for works to the existing 4ZM and 2WS overhead lines in the vicinity of the Spalding Tee-Point, Surfleet Seas End and Moulton Seas End.

Two separate applications under Section 37 of the Electricity Act 1989 (Section 37) are being made for the Overhead Line Works, while modification works to the existing lines will be delivered under Town and Country Planning (General Permitted Development) (England) Order 2015 / The Overhead Lines (Exemption) (England and Wales) Regulations 2009.

The Overhead Line Works are required for the construction of the new Air Insulated Substation (AIS) – 400kV Weston Marsh Substation A, associated landscaping and environmental mitigation works, drainage, highways and other associated works. The substation, and associated infrastructure, falls within the administrative boundary of South Holland District Council and is subject to consent via the Town and Country Planning Act. They are located to the northeast of the town of Spalding, between the River Welland and the existing 400 kV 4ZM overhead electricity line, east of Surfleet Seas End and north of Weston. The relevant application was submitted on 11 May 2026.

Weston Marsh Substation A, and associated Overhead Line Works, is a standalone development to enable connection of the Outer Dowsing Offshore Wind Farm to the national electricity transmission system by 2030. It will fully function as part of the transmission system independent of the outcome of the Grimsby to Walpole Development Consent Order (DCO) application.

A programme of engagement, including a public consultation, on the Section 37 proposals took place in autumn 2025. This included:

- Pre-consultation stakeholder briefings, held virtually with local authority planning officers and offered to elected representatives and parish councils in October and November 2025.
- An eight-page invitation newsletter distributed to 971 households and businesses within 1km of the proposals in the week commencing 17 November 2025.
- Three consultation events, comprising two in-person public information events held in Weston (28 November 2025) and Moulton Seas End (29 November 2025), and one online webinar held on 3 December 2025.
- A dedicated project website, supported by social media advertising and print and digital newspaper advertising, which recorded 17,150 homepage views across 7,298 sessions during the consultation period.
- Multiple feedback channels, including an online feedback form, email, and Freepost address.

This engagement also formed part of National Grid's statutory consultation for the Grimsby to Walpole DCO application, setting out detailed proposals for Route Section 5 of the DCO project.

Feedback was therefore invited as part of both the consultation for the delivery of Weston Marsh Substation A and associated Overhead Line Works to meet the Outer Dowsing Offshore Wind Farm of 2030, and the Grimsby to Walpole DCO.

Following the close of consultation, National Grid also undertook further engagement to ensure that interested parties were kept up to date with the plans for Weston Marsh Substation A and associated Overhead Line Works, as well as the Grimsby to Walpole DCO. This included a short-form social media update video, and a poster shared with Parish Councils and underrepresented groups in April 2026.

C.1 Policy Guidance

C.1.1 Legislation, national and local planning policy relevant to the proposed overhead line works are described in detail in the Section 37 Statement. Key planning policy relevant to this report is summarised in the following sections.

National policy guidance

C.1.2 The National Planning Policy Framework (NPPF) published December 2024 and amended February 2025, sets out the Government’s planning policies for England and how these should be applied and considered for any planning decisions. The NPPF was last updated in February 2025.

C.1.3 National Grid has complied with the Government’s National Planning Policy Framework (NPPF) which states that “early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties.” The NPPF also highlights that “Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.” (Section 4, paragraph 40).

Local policy guidance

C.1.4 South East Lincolnshire Joint Strategic Planning Committee’s SCI (2012), which applies to SHDC as part of the South East Lincolnshire Council Partnership (SELCP), makes the following recommendation with regard to pre-application community engagement:

- “The three partner LPAs actively encourage developers to seek involvement of the community at this [pre-application] stage. Applicants should submit details of any preliminary consultation that they have undertaken within the community as part of their application.” (Section 3, p.17).
- “The partner LPAs believe that potential applicants should pay particular attention to engaging with the wider community before submitting applications which in the opinion of officers are likely to give rise to issues of significant economic, environmental or social impact. Public involvement at this stage should ensure that such schemes are well understood by the local community and other interested parties, and allow early consideration of the fundamental issues relating to whether a particular proposal would be acceptable in principle. The scale and scope of consultation exercises should be agreed with Council officers on a case by case basis.” (Section 3, pp.17-18).

National Grid Policy Guidance

C.1.5 National Grid’s ‘Stakeholder and community amenity policy’ outlines National Grid Electricity Transmission’s commitments when undertaking high-voltage electricity infrastructure works in the UK.

C.1.6 In this document, National Grid outlines a commitment to promote “genuine and meaningful stakeholder engagement”, which will “meet and, where appropriate, exceed the statutory requirements for consultation and engagement” (Section 8, p.8).

C.1.7 This includes commitments to:

- “Seek to identify and understand the views and opinions of all the stakeholders and communities affected by [National Grid’s] works.
- Provide opportunities for engagement early in the process, on consideration of options and alternatives and where there is the greatest scope of 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 the proposed works are communicated openly for meaningful stakeholder and community comment and discussion.
- Seek to clarify those aspects of the works that cannot be changed, and the reasons why this is the case.
- Seek opportunities to minimise the impact of the works where these present themselves.
- 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.
- Provide feedback on how views expressed have been considered and the outcomes of any engagement process or activity.” (Section 8, p. 8)

C.1.8 National Grid has sought to incorporate these points into its engagement programme, in line with its Stakeholder and Community Amenity Policy. This approach is consistent with the national and local policy guidance, both of which encourage pre-application discussions and community involvement at an early stage in the design process.

C.1.9 National Grid has also adhered to guidance provided by the South East Lincolnshire Council Partnership and has applied its own policy commitments to genuine and meaningful engagement. This has resulted in a comprehensive engagement programme which sought views from a variety of statutory and non-statutory stakeholders, landowners, and members of the community.

C.2 Programme of Engagement

Pre-application engagement activities

C.2.1 National Grid has conducted a comprehensive programme of engagement, providing information and inviting feedback on two separate but related proposals:

- Proposals for Route section 5 of Grimsby to Walpole, comprising proposals for Weston Marsh Substations A and B, as well as new and modified Overhead Line Works and associated infrastructure. These proposals form part of a separate DCO application for the wider Grimsby to Walpole project.
- Proposals for Weston Marsh Substation A, as well as new and modified overhead line and associated infrastructure, to facilitate a connection for Outer Dowsing Offshore Wind Farm by 2030. Some of the associated Overhead Line Works consulted on constitute the proposals applied for as part of the Section 37 application.

- C.2.2 This combined approach was taken to enable stakeholders and communities to provide views on both the plans for Weston Marsh Substation A and associated Overhead Line Works, as well as the separate Grimsby to Walpole DCO application.
- C.2.3 Feedback could be provided via an online feedback form, email, post, or by filling out a hardcopy form at in-person information events. Three events were held; two in-person events in Weston and Moulton Seas End, and an online webinar event. An email address and Freepost address were made available throughout the consultation, to allow interested parties to provide feedback.
- C.2.4 To raise awareness of the consultation within the local community, National Grid undertook a range of activities, including:
- Distributing an invitation newsletter to 971 homes and businesses within 1km of the proposals.
 - Distributing an invitation newsletter, and cover letter, to identified stakeholders by post and email. This including local authorities, third-party and community interest groups, hard-to-reach organisations and local representatives.
 - Advertising the consultation via social media. Throughout the consultation, National Grid ran three advertisements in total, promoting the consultation and inviting feedback.
 - Advertising in print and online via local news publications, including:
 - The Spalding and South Holland Voice
 - Lincs Online/Spalding Today
 - Lincolnshire Live/Echo
 - Spalding Guardian
 - Lincolnshire Free Press
 - Holding a press briefing on 17 November 2025, to the following news outlets:
 - BBC Look North
 - Lincolnshire Free Press
 - Issuing a press release to the following news outlets:
 - Boston Standard
 - Cambridge News
 - Eastern Daily Press
 - Lincolnshire Echo
 - Louth Leader
 - Lynn News
 - Wisbech Standard
 - BBC One Look North (East Yorkshire and Lincolnshire)
 - The Spalding and South Holland Voice
 - ITV News Calendar

- Grimsby Telegraph
- BBC Radio Lincolnshire
- ITV News Anglia
- BBC News
- Lincolnshire Free Press and Spalding Guardian
- Lincolnshire Live
- Lincolnshire World
- The Midlands Gazette
- Issuing a digital and physical poster to host and neighbouring Parish Councils to put up at local venues, or to share via their online channels.

C.2.5 Briefing sessions were offered to relevant local authority planning officers, local authority elected representatives, local parish councils, local Members of Parliament, and the public.

C.2.6 Throughout the duration of the 30-day targeted consultation, 70 pieces of correspondence were received through the dedicated communication channels, inclusive of 63 emails, 6 phone calls, and 1 letter.

C.2.7 As described in section C.2.53 below, a total of 284 feedback responses were received from members of the public and interested parties. From the number of feedback forms received, 26 were submitted via the online feedback form on the project website, 244 were received via email, and 14 were received as paper copies in the post.

Consultation process

C.2.8 National Grid presented the approach to the targeted consultation to Planning Officers for the host local authorities, who raised no concerns. These meetings were held with South Holland District Council on 30 October 2025 and with Lincolnshire County Council on 31 October 2025.

Stakeholder briefings

C.2.9 Ahead of the launch of public consultation and during the consultation period, National Grid engaged with key stakeholders to introduce the proposals and outline the approach to consultation. The project team also offered stakeholders an opportunity to ask questions regarding the proposals.

C.2.10 Briefings took place with local planning authorities prior to consultation launch, in October and November 2025. These meetings were held virtually:

- Planning officers from the SELCP attended a briefing on Thursday 30 October 2025.
- Planning officers from Lincolnshire County Council attended a briefing on Friday 31 October 2025.
- Planning officers from Kings Lynn and West Norfolk Borough Council attended a briefing on Monday 3 November 2025.

- Planning officers from Cambridgeshire County Council attended a briefing on Wednesday 5 November 2025.
- Planning officers from Norfolk County Council attended a briefing on Thursday 6 November 2025.
- Planning officers from North East Lincolnshire Council attended a briefing on Friday 7 November 2025.
- Planning officers from Fenland District Council attended a briefing on Tuesday 11 November 2025.

C.2.11 In the days immediately following the launch of the consultation on Tuesday 18 November 2025, councillors from the relevant local authorities were provided with a briefing on the project. These briefings included the opportunity to ask questions about the project. These were held both in-person and via Teams:

- Councillors from South Holland District Council were briefed online on Tuesday 18 November 2025.
- Councillors from Lincolnshire County Council were briefed online on Friday 21 November 2025.
- Cabinet members from Lincolnshire County Council were briefed in-person on Friday 21 November 2025.

C.2.12 Invitations for a parish council briefing were sent to 13 parish councils identified as 'host' or 'neighbours' to either the Weston Marsh Substation A and associated Overhead Line Works, or the Grimsby to Walpole DCO proposals. The briefing was held via Microsoft Teams on Tuesday 25 November 2025.

C.2.13 National Grid also briefed the host Member of Parliament for South Holland and the Deepings, Sir John Hayes, on Thursday 13 November 2025.

Stakeholder notification

C.2.14 On Tuesday 18 November 2025, the start of the consultation period, National Grid sought to notify stakeholders and interested members of the public about the consultation, providing detail on the proposals and inviting feedback.

C.2.15 Letters and emails were sent to community stakeholders, including:

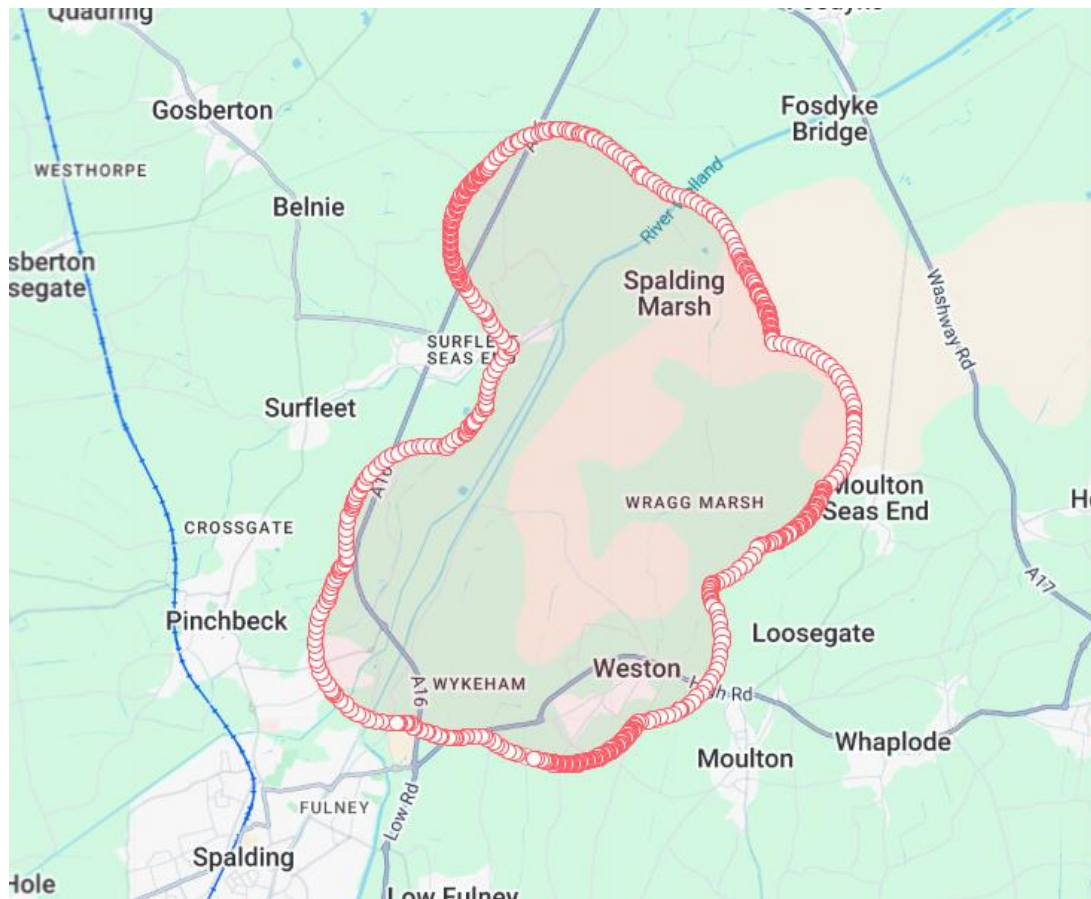
- Local authorities
- Elected representatives
- Environmental NGOs and partnerships
- Parish councils
- Heritage and civic groups
- Sports and recreation organisations
- Education and faith organisations
- Agriculture, land and countryside interest groups
- Potentially interested landowners and persons with an interest in land

- C.2.16 In accordance with the requirements for the wider Grimsby to Walpole DCO application, technical and environmental statutory consultees were also notified of the consultation and invited to provide feedback.
- C.2.17 National Grid also sought to engage underrepresented groups, seeking to engage and encourage feedback from:
- Older people
 - People with visual impairments
 - People with limited mobility/disability
 - Youth groups
 - Carers and families with young children
 - Economically inactive individuals
 - Geographically isolated individuals and communities
 - Local underrepresented minority groups (such as black, Asian, and minority ethnicity)
 - English as an Additional Language (EAL)
 - Travellers
 - Digitally isolated
- C.2.18 A full list of the stakeholders identified during the consultation who were invited to participate can be found in **Appendix C-a**. Those listed received a letter on the launch day outlining the proposals and explaining how feedback could be submitted.
- C.2.19 Members of the public signed up to a ‘Keep Informed’ list were also directly invited to participate via a notification letter, sent by email only. The Keep Informed list includes individuals who have voluntarily registered their contact details through previous engagement or the project website in order to receive updates and information about the proposals and consultation activity.

Community newsletter

- C.2.20 The consultation was promoted via an 8-page ‘Community newsletter’, outlining the proposals for Route section 5 of Grimsby to Walpole and the proposals for Weston Marsh Substation A and associated Overhead Line Works. The newsletter provided details of how members of the public could get involved in the targeted consultation.
- C.2.21 The newsletter was posted to 971 households and businesses within 1 km of either proposal in the week commencing Monday 17 November 2025. The following map illustrates the distribution area:

Image C.1 Mailing distribution zone



C.2.22 The eight-page Community newsletter contained the following information:

- summary of proposals for 'Route section 5: New Weston Marsh Substations A and B', including proposals to deliver Weston Marsh Substation A to enable connection of the Outer Dowsing Offshore Wind Farm to the national electricity transmission system by 2030.;
- information regarding the wider Grimsby to Walpole proposals;
- an overview of the need
- indicative site location plans;
- consultation information;
- details of the project website and ways to get involved online (including a QR code linking to an online feedback form);
- information on how to attend public information events, the webinar, and the location of local information points with paper copies and memory sticks containing the consultation documents;
- email, freephone, and freepost information, and;
- details of how to respond to the consultation.

Newspaper advertisements

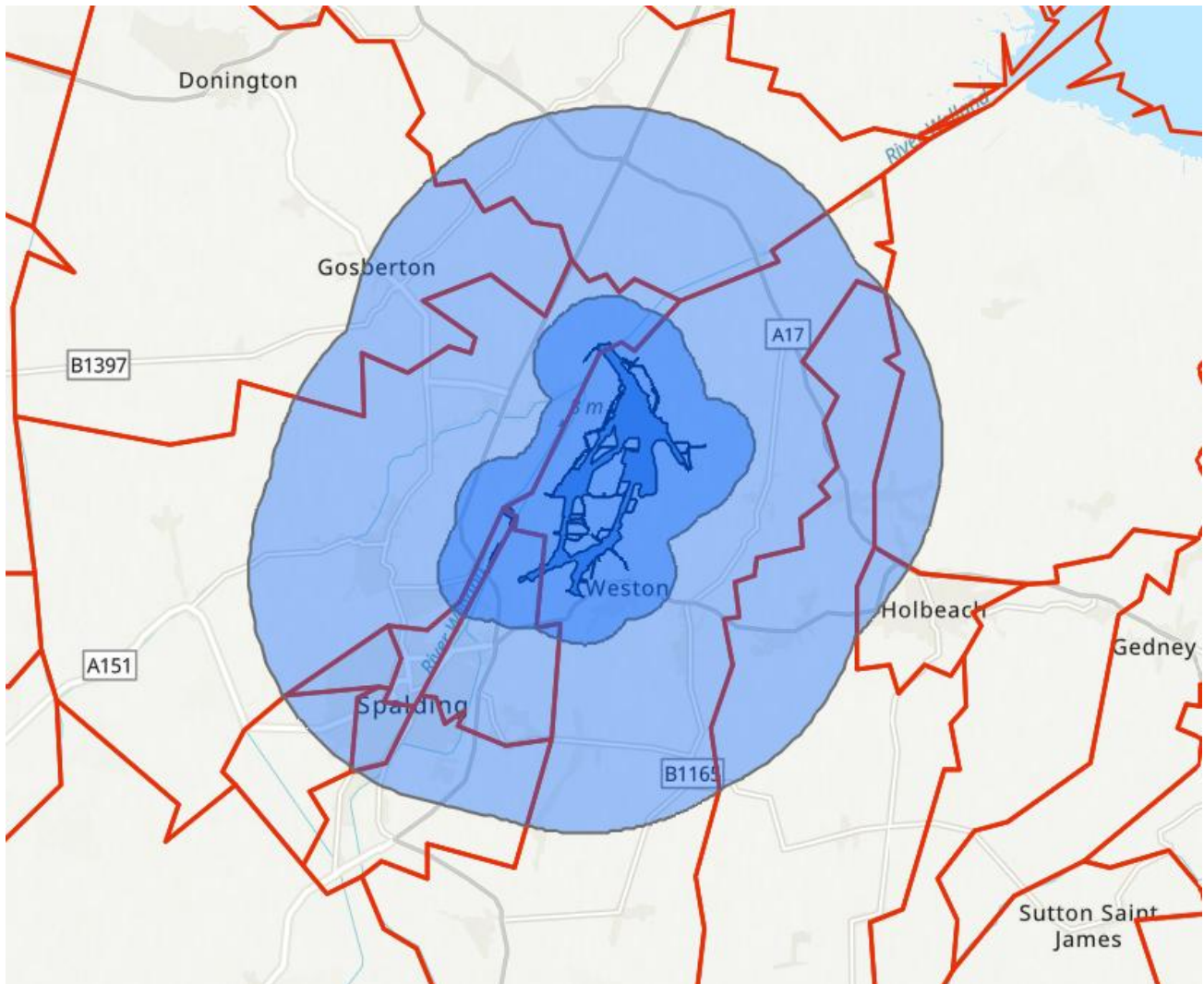
C.2.23 Throughout the consultation period, National Grid advertised the consultation in locally circulated newspapers and online.

- C.2.24 Print advertisements were published in two locally circulating newspapers:
- Spalding Guardian on Thursday 27 November 2025.
 - Spalding and South Holland Voice on Thursday 20 November and Thursday 4 December 2025.
- C.2.25 Digital advertisements were placed on the websites of three locally circulating newspapers:
- Lincolnshire Live from Monday 24 November – Sunday 30 November 2025.
 - Spalding and South Holland Voice from Monday 24 November – Sunday 30 November 2025.
 - Spalding Today from Monday 24 November – Sunday 30 November 2025.
- C.2.26 Additionally, a further digital advertisement was placed on 11 December 2025, reminding viewers of the consultation deadline. This was circulated in local news publication, Spalding Guardian.

Social media

- C.2.27 To promote the consultation, two social media assets were publicised. This consisted of one static carousel and one video.
- C.2.28 The carousel advertisement provided details of the upcoming public information events and was advertised on Meta (Facebook and Instagram) between Tuesday 18 November and Tuesday 25 November 2025. During this time, the ad generated 74,658 impressions (times the content appeared on users' screens) and drove 1,139 clicks to the project website.
- C.2.29 A consultation video promoted the consultation, explaining the rationale for the proposals, providing context of the broader project, and encouraged viewers to participate in the consultation. This video was posted on Meta and TikTok for the entire duration of the consultation. Across both platforms, the consultation video received a total of 666,900 impressions, generating 4,445 clicks to the project website.
- C.2.30 The social media assets were geographically targeted to be displayed to those present in the light blue zone below, set at within 5 km of the proposals for Route Section 5 of the Grimsby to Walpole DCO, as shown in Figure 2 below.

Image C.2 5km radius of proposals in Route section 5



Local information points

- C.2.31 Paper copies of key consultation documents were available to take away from local information points throughout the consultation period. Reference copies of technical documents were also available to view during this period.
- C.2.32 Materials were held at two local libraries close to the proposals:
- Spalding Library, Victoria Street, Spalding, PE11 1EA
 - Long Sutton Library, Trafalgar Square, Long Sutton, Spalding, PE12 9HB

Public information events

- C.2.33 Two public information events were held to present the proposals and provide people with an opportunity to speak to the project team.
- C.2.34 The proposals were presented at the events using multi-media formats, including:
- A0 site location maps, including site boundaries, permanent and temporary structures, access routes, and environmental mitigation;
 - technical documents, including the Supplementary Design Development Report, Weston Marsh Siting Study Report, and Updated Strategic Options Report;

- consultation documents, including the Weston Marsh targeted consultation document; Community newsletter; feedback form, and Weston Marsh targeted consultation approach document;
- Supplementary Preliminary Environmental Information Report (as part of the DCO application);
- banners;
- 3D Visualisation tools, presenting illustrative ‘street-view’ perspectives of the proposals;
- interactive map, and;
- ‘fly-through’ videos, presenting illustrative birds-eye perspectives of the proposals.

C.2.35 The first event was held in Weston on Friday 28 November 2025, at Weston Village Hall from 2pm to 7pm. 69 people attended this session.

C.2.36 The second event was held in Moulton Seas End on Saturday 29 November 2025, at Moulton Seas End Village Hall from 11am to 4pm. 31 people attended this session.

Webinar event

C.2.37 An online webinar was held to present the proposals to the public and offer an opportunity to ask questions of the project team virtually.

C.2.38 The webinar was held on Wednesday 3 December via Microsoft Teams from 6:30pm to 7:30pm. Five people attended this session.

C.2.39 A recording of the webinar was also uploaded to The Project website and was made available to view for the remainder of the consultation.

Press release

C.2.40 To ensure the wider community was aware of the consultation, a detailed press release was issued to several local media publications.

The Project website

C.2.41 A pre-existing project website (nationalgrid.com/g-w) was updated upon the launch of consultation, providing information on the proposals for Weston Marsh Substation A and associated Overhead Line Works, as well as information regarding Route Section 5 of the Grimsby to Walpole DCO.

C.2.42 Information regarding the proposals, featured on the website, included:

- detailed descriptions, maps and drawings regarding the proposals;
- illustrative ‘fly-through’ videos;
- a document library containing all relevant consultation documents;
- a ‘Frequently Asked Questions’ section;
- an interactive map
- details of ongoing survey work and information for landowners;

- details of consultation activities, including in-person events, deposit points, and the webinar; and
- a link to an online feedback form.

C.2.43 The Project website recorded 17,150 homepage views across 7,298 sessions during the consultation period, with users spending an average of just over 11 minutes on the site.

Feedback form

C.2.44 A feedback form was made available throughout the 30-day consultation period, supporting residents and stakeholders to share their views on the proposals. This feedback form was made available in paper copy at public information events and local-information points, and as an online form on the project website. Interested parties could also request a paper copy of the feedback form to be sent to their home address, free of charge.

C.2.45 The form asked three open questions covering aspects of the Grimsby to Walpole DCO application, and proposals for Weston Marsh Substation A and associated Overhead Line Works to enable connection of the Outer Dowsing Offshore Wind Farm to the national electricity transmission system by 2030.

C.2.46 Both the online and print feedback form were identical in content.

Pre-paid post, email address and freephone number

C.2.47 During the consultation, community relation lines were made available to those who wished to find out more about the proposals, request hard copies of materials, or to provide feedback.

C.2.48 An email address (contact@g-w.nationalgrid.com) was made available for interested parties to contact the project team to ask questions or provide feedback.

C.2.49 The freephone number (0808 258 4395) was in operation Monday-Friday between the hours of 9am and 5:30pm. Outside of these hours a voicemail facility was available for messages to be left, and one of the project team would call back at the next opportunity.

C.2.50 Freepost envelopes were made available at public information events and local information points. Members of the public could also write the Freepost name, "Freepost G TO W", on an envelope to send correspondence, with no stamp required.

Outbound communications

C.2.51 Throughout the consultation period, two mass communications were sent to stakeholders and interested parties, via the project email.

C.2.52 On Tuesday 9 December 2025, a reminder about the Weston Marsh targeted consultation deadline was sent to stakeholders and individuals subscribed to the project's 'Keep Informed' list. The email reiterated the deadline and signposted documents, as well as how to submit comments.

C.2.53 On Monday 22 December 2025, a close of consultation email was sent to stakeholders and individuals subscribed to the project's 'Keep Informed' list. The

email thanked those who participated in the Weston Marsh targeted consultation and outlined next steps for the project.

Analysis of feedback

- C.2.54 This Stakeholder Consultation Record covers feedback received in relation to the S37 applications for works to the 4ZM and 2WS overhead lines. This is because the Stakeholder Consultation Record supports the S37 applications at Weston Marsh Substation A and therefore focuses on feedback relevant to those applications only.
- C.2.55 As the need for Overhead Line Works is closely linked to the proposed Weston Marsh Substation A, feedback received is in many cases directed towards the Scheme as a whole. To ensure all relevant feedback is considered as part of the development of the Overhead Line Works specifically, an over-inclusive approach has been taken to identifying, and responding to, relevant feedback within this Stakeholder Consultation Record.
- C.2.56 Comments concerning the Substation Works, specifically, are included in the Statement of Community Involvement submitted with its Town and Country Planning Act application. Comments concerning the Grimsby to Walpole DCO application will be included within the Consultation Report submitted as part of the DCO application for Grimsby to Walpole.
- C.2.57 A total of 284 responses were received. These were received through the following channels:
- 26 feedback forms via online feedback form;
 - 244 emails containing comments on the proposals and consultation; and
 - 14 pieces of feedback were also received via freepost. In this case, feedback forms were accepted up until Tuesday 6 January 2025, to allow for delays in posting over the Christmas period following the closure of consultation.

Approach to analysis

- C.2.58 All open (qualitative) responses received as part of the consultation have undergone a process of coding and analysis. The steps behind this process are explained below.
- C.2.59 Sources of open responses included:
- responses to open questions in the feedback form (hardcopy and online);
 - email responses (which clearly constituted a consultation response); and
 - letter responses (which clearly constituted a consultation response).
- C.2.60 Each feedback response was assigned a unique reference number to create an audit trail throughout the analysis process. Quality assurance checks were undertaken to ensure that each response was assigned.
- C.2.61 To code open responses, an initial coding framework was produced, which was informed by the content of the feedback form. The coding framework enabled a breakdown and assigning of responses to corresponding themes, as appropriate. If multiple themes were covered in feedback, each was coded appropriately to ensure all matters raised within the feedback were captured. Where appropriate, themes were grouped.

- C.2.62 As coding progressed, the coding framework was further informed and developed (based on the consultation feedback) to identify ‘themes’ that were more detailed in nature, which were referred to as topics.
- C.2.63 The coding exercise described above allowed the most frequently mentioned themes, in respect of the proposed Overhead Line Works, to be identified. These are the focus of this Stakeholder Consultation Record. The themes are detailed and addressed in **Table C.1**, below.
- C.2.64 The most frequently mentioned themes referred to in **Table C.1** are:
- Consultation
 - Ecology and biodiversity
 - Planning
 - Landscape and visual impact
 - Agricultural land and soils
 - General comments
 - Noise and vibration
 - Historic environment
 - Traffic
 - Water environment and flood risk

Response to comments

Table C.1 Themes raised in feedback and National Grid's response

Theme	Consultation: Respondents raised concerns that their feedback would not meaningfully influence proposals, with some feeling the consultation was a box-ticking exercise. Others felt the materials were misleading, overly technical, or provided too much detailed information. Comments also suggested that the consultation was not sufficient, being too short, poorly advertised, or inaccessible to members of the public.
National Grid's Response	<p>National Grid is committed to ensuring that consultations on electricity transmission proposals are fair, accessible, and present accurate information to the public. For this consultation, a multi-channel approach was used to ensure residents and stakeholders could get involved, stay informed, and provide their feedback.</p> <p>Information was shared through direct mailings, press and media campaigns, and public information events held at accessible venues along the route. A webinar was also provided for those unable to attend in person. National Grid also offered a dedicated phone line and email inbox, as well as a Freepost address for written responses, ensuring that anyone could take part regardless of digital access or mobility. Paper copies of key consultation materials were deposited in two local libraries and also made available upon request. Accessible versions of key consultation materials were also offered, though no requests were received.</p>

Where residents felt the content presented was overly technical or unclear, they were able to contact the project team for clarification through the community relations channels outlined above, as well as at events and at the webinar. This ensured that anyone who needed further information or explanation to provide feedback could receive it promptly and directly. Feedback has informed post-consultation design development and refinement. These refinements have shaped the proposals now submitted as part of the two S37 applications.

In relation to the consultation period, National Grid contacted the relevant local authorities to outline the proposed strategy and specifically invited comments or suggested amendments to the consultation approach. As no requests for changes were received, the consultation proceeded as planned and as described in the published Weston Marsh targeted consultation approach document. Holding a 30-day consultation ensured sufficient time for the community to engage meaningfully through events, online channels, and written responses.

Theme	<p>Ecology and biodiversity: Respondents expressed concern over the potential impact, during both construction and operation, of the proposed works on existing habitats and wildlife in the area. Feedback highlighted the wellbeing of protected or notable species, including bats, breeding birds, invertebrates, and migratory birds.</p> <p>Respondents also noted that the proposals should achieve biodiversity net gain and felt that key surveys still needed to take place (including bats, breeding birds, invertebrates) and that many were incomplete or deferred.</p>
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National Grid's response	<p>National Grid understands the importance of protecting local habitats and the wildlife that depends on them. A comprehensive programme of ecological surveys has taken place to establish an accurate picture of the Weston Marsh area, as well as the potential impacts of the Overhead Line Works. This is inclusive of protected or notable species, including terrestrial invertebrates, great crested newt, reptiles, wintering birds, breeding birds, badger, bats, otter, water vole, fish, aquatic macroinvertebrates and macrophytes, and other notable species.</p> <p>These surveys have helped us to identify where potential effects can be avoided, reduced, or mitigated during construction and operation.</p>
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Theme	<p>Planning: Comments on planning largely focused on the cumulative impact of the proposals, in relation to other energy and infrastructure projects within the area. Respondents also expressed concern that the assessments to date had not fully considered alternative options, cumulative effects, or enforceable mitigation. Comments cited guidance within the NPPF, arguing that agricultural land should not be used.</p> <p>Additional feedback with regard to planning highlighted concerns with how the proposals might interact with existing and future development in the area. Respondents emphasised the importance of engaging with developers and local authorities early.</p>
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National Grid's response	<p>The National Planning Policy Framework (Section 15, paragraph 187) confirms that planning policies and decisions should contribute to and enhance the natural and local environment, including through recognition of the value of Best and Most Versatile (BMV) agricultural land. Within the Weston Marsh</p>
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area, land is provisionally classified as Grade 1 BMV throughout, and this characteristic is common across the identified siting area. The proposals for Weston Marsh Substation A, which guide the need for the proposed Overhead Line Works, have been brought forward within a location identified through a structured site selection process that responds to technical, operational and network requirements. There are no brownfield sites within the required network location capable of accommodating the Substation Works, and no lower grade agricultural land is available in this area.

The proposed location for the new Weston Marsh Substation A has also been selected in part to avoid proximity to residential properties. The siting of the substation has been chosen to minimise the number of affected land parcels reduce impact on landowners as far as practicable, and with consideration of the length of new build access roads required to reach the nearest existing highway.

Environmental and technical assessments undertaken to date have played an important role in influencing the proposals for the Overhead Line Works and are detailed as part of this application. The assessments consider environmental, technical, and socio-economic factors that have helped to inform the routing of the Overhead Line Works.

The Section 37 and Form B application processes ensure robust local scrutiny, public consultation, and careful consideration of environmental and community impacts before permission is granted. As part of this application, a draft Construction Traffic Management Plan and Outline Construction Management Plan has been submitted. The final versions of these plans will be secured through planning condition.

National Grid recognises that a number of energy projects are being planned in this area, including those promoted by Downing Renewables, Outer Dowsing, and others. National Grid’s proposals are being developed independently, but with recognition of the importance of working together to manage the combined impact of multiple projects. To help coordinate and minimise disruption, National Grid takes part in a developer forum with other project promoters, local planning authorities, and key stakeholders. This forum is designed to share information, align construction plans where possible, and ensure that community feedback is heard and considered across all projects. National Grid is committed to ongoing collaboration with local authorities, developers, and the community to make sure that the cumulative effects of all projects are properly managed.

National Grid remains committed to ongoing engagement with local authorities and other developers in the area, to ensure that any potential interactions are appropriately managed.

Theme	Landscape and visual impact: Respondents highlighted issues around the visual impact of the Overhead Line Works, during both construction and operational periods.
National Grid’s response	Temporary compounds, haul roads, construction equipment, and the erection of the Substation Works and Overhead Line Works will alter the landscape, particularly due to the flat, open nature of the Fenland. Siting the substation close to the two existing 400 kV overhead lines helps to reduce the spread of infrastructure across the landscape.

During operation, the Overhead Line Works may be perceptible, with additional pylons visible, but would be seen in the context of the existing 400 kV overhead lines. Therefore, the new pylons would not fundamentally alter the composition or character of the views currently experienced and overall the magnitude of change during operation is expected to be very small.

With regard to concerns about cumulative impact, National Grid is committed to ongoing collaboration with local authorities, developers, and the community to make sure that the cumulative effects of all projects are properly managed.

As part of this application, a Landscape and Visual Impact Appraisal (LVIA) and Landscape and Visual Photomontages details the potential effects of the Overhead Line Works and how these can be avoided, reduced, or mitigated during construction and operation.

Theme: **Agricultural land and soils:** Relating to this theme, comments primarily expressed a preference for the proposals, including both the Overhead Line Works and Weston Marsh Substation A, to avoid high-quality productive agricultural land. This was largely linked to food security, with respondents noting that the proposals would make it more difficult for farmers to work their land and would disrupt agricultural operations.

Some comments stressed that National Grid should support affected farmers, including by restoring land back to its original conditions after works are completed and ensuring soil quality is not diminished.

National Grid's response: National Grid is committed to minimising the impact on farmland and working collaboratively with landowners throughout the process.

Whilst previously developed ('brownfield') land may ordinarily be preferred for the siting of works, no suitable brownfield sites were identified for the Substation Works. National Grid recognises that the proposals will have an impact on agricultural land, both temporarily and permanently. However, land that is temporarily used during construction will be carefully restored to its original condition and ALC grade, so that farming can resume.

The area in which a need for the substation was identified is all defined as Provisional ALC Grade 1 Land. Therefore, it is not possible to locate the works on a lower grade of land. ALC surveys will be used to inform soil handling protocols and mitigation measures, to minimise impact on these sensitive soils.

During construction of the Overhead Line Works, there will be some soil handling and disturbance. National Grid will follow good practice to protect soil quality and support important ecosystem services, including water flow and carbon storage. Where possible, surplus soil will be reused within the project area.

During operation, National Grid will continue to work closely with landowners to ensure that farming operations can continue as smoothly as possible. A landowner request to amend maintenance access, reflecting recent changes to the farm layout, has already been agreed. Working closely with landowners helps ensure that long term maintenance requirements for the substation remain aligned with ongoing farming practices.

National Grid is also committed to reinstating land required temporarily, to the pre-construction ALC grade, to enable agriculture to resume after the works are completed.

Theme: **General comments:** More general comments relating to the proposed Overhead Line Works were regarding their association with the delivery of Weston Marsh Substation A and Grimsby to Walpole. Respondents expressed concern that Lincolnshire, or their area, is disproportionately accommodating energy and infrastructure developments, and disagreed with the prospect of hosting further infrastructure.

A number of respondents also reported confusion about the relationship between the proposed overhead line and Substation Works and other ongoing and planned projects in the area, requesting clearer information on timing and how the projects fit together.

National Grid's response: The proposed overhead line and Substation Works form part of a wider effort to strengthen the transmission network, which is required to move electricity efficiently across the country and maintain a secure and reliable supply. In Lincolnshire, additional transmission infrastructure is needed to address capacity constraints and support the connection of new electricity generation. The overhead line and Substation Works will provide a connection point for Outer Dowsing Offshore Wind Farm, allowing renewable electricity to be supplied to homes and businesses by 2030.

Further work to Substation A, the construction of Substation B, additional network connections, Overhead Line Works, and underground cabling between the substations will be delivered separately as part of the DCO application for Grimsby to Walpole.

With regard to the duration of construction, delivering the overhead line and Substation Works earlier than Grimsby to Walpole will result in a longer overall construction period at Weston Marsh. However, the approach is necessary to meet the connection date for Outer Dowsing Offshore Wind, while later works complete the Grimsby to Walpole project. National Grid is committed to ongoing engagement with local authorities, landowners, and communities, to ensure that construction is carried out responsibly.

Theme: **Noise and vibration:** Comments relating to noise and vibration focused on the potential level of disruption during both construction and operational phases of the proposed Substation Works and Overhead Line Works. This included comments regarding construction-related vibration affecting nearby properties, as well as the potential for ongoing noise disturbance from the operational substation.

Respondents also expressed concern over whether the assessments undertaken to date were sufficient. Some comments called for further surveys that investigated noise and vibration disruption in the worst-affected areas, in a broader range of weather conditions, and considering seasonal variation. A number of respondents also outlined that effective mitigation of these factors should be a priority.

National Grid's response: Assessments to date have considered construction noise, construction-related vibration, construction traffic noise, operational noise, and noise and vibration arising from maintenance activities. These assessments have covered those living within one kilometre of the proposed Substation Works and Overhead Line Works, as well as nearby sensitive receptors. These preliminary assessments conclude that, with mitigation in place, no likely significant noise or vibration effects are predicted during either construction or operation.

Should the planning application for Overhead Line Works be approved, a Construction Environmental Management Plan (CEMP) will be introduced to ensure that construction work is carried out safely, effectively, and with as little disruption as possible. An outline CEMP has been submitted as part of the S37 applications, and a final version of the CEMP will be prepared by the main works contractor prior to construction in accordance with the Outline CEMP.

Theme: **Historic environment:** Feedback expressed concerns surrounding the impacts of the proposals on the historic environment during construction and operation, particularly noting the cumulative impact of multiple projects within the area.

Some felt that the indirect impact of the proposals on heritage settings had been minimised during the consultation, with limited visualisation or assessment of cumulative change.

National Grid's response: National Grid understands the importance of the historic environment and recognise concerns about how the proposals, alongside other projects in the area, may affect heritage assets and their setting. Protecting the character of the Fenland has been a key consideration throughout the design and siting process.

The proposed location for the Overhead Line Works and the Weston Marsh Substation A was carefully considered to avoid negatively impacting the surrounding historic environment. There are no designated heritage assets located within 1km of the proposed Overhead Line Works, and the site offers opportunity for mitigation planting to help integrate the substation into the landscape.

Theme: **Traffic:** Comments stressed that construction traffic should avoid local roads, noting that the current routes were not suitable for HGVs, and construction traffic would do further damage. Other comments requested clearer information on traffic mitigation measures, with some suggesting that the current traffic plan needed revising.

National Grid's response: Construction will involve transporting materials, equipment, and personnel to and from the site. Many local roads are not suitable for heavy goods vehicles (HGVs), so new access points, haul roads, and temporary highway improvements, such as passing places or road widening, are planned. These measures are designed to reduce the use of unsuitable roads and minimise traffic through settlements and sensitive areas. Where road closures are needed, they will be kept to a minimum, with diversions and property access maintained.

Feedback from residents along Marsh Road included concerns about increased construction traffic passing their houses. Further review identified that an alternative access from Stone Gate, using a dedicated haul road, allowed construction traffic to be routed away from Marsh Road where practicable.

A Construction Traffic Management Plan has been submitted as part of the S37 applications to demonstrate construction traffic is managed effectively. The strategy and measures contained within will be finalised and adopted by National Grid and the appointed main works contractor prior to the undertaking of the Overhead Line Works. National Grid will continue to work closely with

local authorities and landowners to ensure that road disruption due to construction is minimised.

Theme: **Water environment and flood risk:** Comments received highlighted concerns regarding flooding, noting that the area is prone to flooding and suggesting further assessments might be needed. Respondents also noted concerns regarding drainage, and the impact on local water courses.

National Grid's response: The proposed Overhead Line Works are not expected to increase flood risk in the area. The site is low-lying and flat, with several surface water features. The ground is made up of tidal flat deposits, which do not play a large role in water supply or river flows.

While construction will add new surfaces and drainage systems, National Grid is committed to following all flood risk requirements and using sustainable drainage systems (SuDS), as well as following best practice to manage water runoff and protect water quality.

With all planned mitigation and controls in place, the Substation Works should not increase flood risk.

Appendix C-a Stakeholder list

- Active Lincolnshire
- Advanced Electricity Networks Ltd
- Affinity Water
- Age UK Cambridgeshire
- Aidien Ltd
- Algarkirk Parish Council
- Alzheimer's Society - North East Lincolnshire
- Anglian Water
- Anthony Curton Church of England Voluntary Aided Primary School
- Ashby Community Hub
- Associated British Ports (ABP)
- Aurora Utilities Ltd
- Bedford Borough Council
- Bedfordshire Fire and Rescue Authority
- Bedfordshire Police and Crime Commissioner
- Black Sluice IDB
- Boston and District Athletic Club
- Boston Borough Council
- Boston College
- Boston Community Runners
- Boston Ramblers
- Boston Wheelers Cycling Club
- Breckland District Council
- British Horse Society
- British Railway Boards Limited
- British Telecommunications PLC
- Broads Authority
- Business Lincolnshire
- Cadent Gas Limited

- Cambridge University Hospitals NHS Foundation Trust
- Cambridge Water (Part of South Staffs Water)
- Cambridgeshire & Peterborough NHS Foundation Trust
- Cambridgeshire and Peterborough Combined Authority
- Cambridgeshire Community Services NHS Trust
- Cambridgeshire County Council
- Cambridgeshire Fire and Rescue Authority
- Cambridgeshire Police and Crime Commissioner
- Cambridgeshire Traveller Health
- Cambs Citizen Advice Bureau
- Canal and River Trust
- Carbon Free 2030
- Carers First Lincolnshire
- Cellnex UK Limited
- Central Bedfordshire Council
- Centrica PLC
- Christian Action & Resource Enterprise (CARE)
- Christians Against Poverty
- Chrysaor Production (UK) Limited
- Churches Together in All Lincolnshire
- Civil Aviation Authority
- Climate Hope Action in Norfolk
- Coal Authority
- Cllr Aaron Spencer (South Holland District Council)
- Cllr Adam Grist (East Lindsey District Council)
- Cllr Alex McGonigle (Lincolnshire County Council)
- Cllr Alistair Beales (Borough Council of King's Lynn and West Norfolk)
- Cllr Allan Beal (South Holland District Council)
- Cllr Amjad Iqbal (Peterborough City Council)
- Cllr Andrew Woolf (South Holland District Council)
- Cllr Angie Harrison (South Holland District Council)
- Cllr Angus Ellis (Peterborough City Council)

- Cllr Anthony Casson (South Holland District Council)
- Cllr Ashley Baxter (Lincolnshire County Council)
- Cllr Ashley Baxter (South Kesteven District Council)
- Cllr Cllr Bryan Alcock (South Holland District Council)
- Cllr Callum Butler (Boston Borough Council)
- Cllr Charles Nicholas Worth (South Holland District Council)
- Cllr Charmine Morgan (South Kesteven District Council)
- Cllr Chris Boden (Fenland District Council)
- Cllr Chris Morley (Borough Council of King's Lynn and West Norfolk)
- Cllr Christian Hogg (Peterborough City Council)
- Cllr Christopher Seaton (Fenland District Council)
- Cllr Craig Leyland (East Lindsey District Council)
- Cllr Dale Broughton (Boston Borough Council)
- Cllr Danny Brookes (Lincolnshire County Council)
- Cllr David Ashby (South Holland District Council)
- Cllr David Brown (Boston Borough Council)
- Cllr David Connor (Fenland District Council)
- Cllr David East (Lincolnshire County Council)
- Cllr Dee Laws (Fenland District Council)
- Cllr Elizabeth Sneathe (South Holland District Council)
- Cllr Francis Bone (Borough Council of King's Lynn and West Norfolk)
- Cllr Gary Christy (Fenland District Council)
- Cllr Gary Taylor (Lincolnshire County Council)
- Cllr Gary Taylor (South Holland District Council)
- Cllr Glynis Scalese (South Holland District Council)
- Cllr Graham Marsh (East Lindsey District Council)
- Cllr Helen Staples (Boston Borough Council)
- Cllr Henry Bingham (South Holland District Council)
- Cllr Ian Benney (Fenland District Council)
- Cllr Ian Carrington (North Kesteven District Council)
- Cllr Ingrid Sheard (South Holland District Council)
- Cllr James Avery (South Holland District Council)

- Cllr James Cantwell (Boston Borough Council)
- Cllr James Le Sage (South Holland District Council)
- Cllr Jan French (Fenland District Council)
- Cllr Jan Whitbourn (South Holland District Council)
- Cllr Jane King (South Holland District Council)
- Cllr Jim Astill (South Holland District Council)
- Cllr Jim Moriarty (Borough Council of King's Lynn and West Norfolk)
- Cllr Jo Rust (Borough Council of King's Lynn and West Norfolk)
- Cllr John Baxter (Boston Borough Council)
- Cllr Katy Cole (Peterborough City Council)
- Cllr Kenneth Redfern (Lincolnshire County Council)
- Cllr Lance Pennell (North Kesteven District Council)
- Cllr Lesley King (South Holland District Council)
- Cllr Liam Kelly (Lincolnshire County Council)
- Cllr Manzur Hasan (Lincolnshire County Council)
- Cllr Manzur Hasan (South Holland District Council)
- Cllr Margaret Geaney (South Holland District Council)
- Cllr Mark Le Safe (South Holland District Council)
- Cllr Mark Smith (North Kesteven District Council)
- Cllr Martin Foster (East Lindsey District Council)
- Cllr Martin Hill OBE (Lincolnshire County Council)
- Cllr Mary Green (North Kesteven District Council)
- Cllr Michael Cheyne (Lincolnshire County Council)
- Cllr Michael de Whalley (Borough Council of King's Lynn and West Norfolk)
- Cllr Mike Gilbert (Boston Borough Council)
- Cllr Mohammed Farooq (Peterborough City Council)
- Cllr Mohammed Jamil (Peterborough City Council)
- Cllr Nanette Chapman (South Holland District Council)
- Cllr Natalie Oliver (Lincolnshire County Council)
- Cllr Neil Boyce (Peterborough City Council)
- Cllr Neil Carey (Lincolnshire County Council)
- Cllr Nick Worth (South Holland District Council)

- Cllr Paul Lock (Lincolnshire County Council)
- Cllr Paul Redgate (South Holland District Council)
- Cllr Paul Stokes (South Kesteven District Council)
- Cllr Peter Bedford (Boston Borough Council)
- Cllr Phil Dilks (South Kesteven District Council)
- Cllr Philip Knowles (South Kesteven District Council)
- Cllr Raymond Condell (Lincolnshire County Council)
- Cllr Rhys Baker (South Kesteven District Council)
- Cllr Richard Cleaver (South Kesteven District Council)
- Cllr Richard Dixon-Warren (South Kesteven District Council)
- Cllr Richard Wright (North Kesteven District Council)
- Cllr Robert Gibson (Lincolnshire County Council)
- Cllr Robert Gibson (South Holland District Council)
- Cllr Sally Tarry (North Kesteven District Council)
- Cllr Sally-Ann Slade (South Holland District Council)
- Cllr Sam Chauhan (South Holland District Council)
- Cllr Samantha Hoy (Fenland District Council)
- Cllr Sandeep Ghosh (Boston Borough Council)
- Cllr Sandra Squire (Borough Council of King's Lynn and West Norfolk)
- Cllr Sarah Devereux (East Lindsey District Council)
- Cllr Sarah Sharpe (Boston Borough Council)
- Cllr Sean Matthews (Lincolnshire County Council)
- Cllr Shabina Qayyum (Peterborough City Council)
- Cllr Sidney Imafidon (Fenland District Council)
- Cllr Simon Ring (Borough Council of King's Lynn and West Norfolk)
- Cllr Sophie Hutchinson (South Holland District Council)
- Cllr Steve Clegg ((Lincolnshire County Council)
- Cllr Steve Kirk (East Lindsey District Council)
- Cllr Steve Tierney (Fenland District Council)
- Cllr Sue Wooley (South Kesteven District Council)
- Cllr Susan Wallwork (Fenland District Council)
- Cllr Susan Wooley (Lincolnshire County Council)

- Cllr Susanne Lintern (Borough Council of King's Lynn and West Norfolk)
- Cllr Thomas Kemp (East Lindsey District Council)
- Cllr Thomas Sneath (Lincolnshire County Council)
- Cllr Thomas Sneath (South Holland District Council)
- Cllr Tom Ashton (East Lindsey District Council)
- Cllr Tracey Carter (South Holland District Council)
- Cllr Virginia Moran (South Kesteven District Council)
- Cllr William Gray (East Lindsey District Council)
- Cllr Zameer Ali (Peterborough City Council)
- Cllr Zoe Lane (South Kesteven District Council)
- CNG Services Ltd
- Confederation of British Industry
- Council for the Protection of Rural England
- County Water Ltd
- Cowbit Parish Council
- Crowland Parish Council
- Cycling UK Lincolnshire
- Cycling UK Louth
- Dame Andrea Jenkyns (Mayor of Greater Lincolnshire Combined County Authority)
- Deeping St. Nicholas Parish Council
- Diamond Transmission Partners
- Diamond Transmission Partners Hornsea One Limited
- Diamond Transmission Partners Hornsea Two Limited
- Diocese of Lincoln
- Disability Lincs
- Dunham Bridge (A57)
- Dwr Cymru
- E.ON UK PLC
- East Cambridgeshire District Council
- East Lincolnshire Solar
- East Lindsey District Council
- East Mercia Rivers Trust

- East Midlands Ambulance Trust
- East Midlands Combined Authority
- East Midlands HPT
- East Midlands Synod
- East of England Ambulance Services NHS Trust
- East of England HPT
- East of England HPT (Norfolk)
- Eastern Power Networks Plc
- Eclipse Power Network Limited
- EcoGrimsbyWest
- EcoMablethorpe
- EDF Energy Limited
- Energy Asset Group Holdings Limited
- Energy Assets Networks Limited
- Energy Assets Pipelines Limited
- Environment Agency
- Environment Agency – Anglian
- Ep Shb Ltd
- Equans UK
- ES Pipelines Ltd
- ESP Connections LTD
- ESP Electricity Limited
- ESP Networks LTD
- ESP Pipelines Limited (part of ESP Utilities Group)
- ESP Pipelines Ltd
- ESP Utilities Group Limited
- ESP Water
- Essex County Council
- Essex Fire and Rescue Authority
- Essex Police and Crime Commissioner
- Essex Suffolk Norfolk Pylons
- Ethnic minority and Traveller education team

- Federation of Small Businesses
- Fendale IDB c/o Witham Fourth District IDB
- Fenland District Council
- Fenland District Council (Port of Wisbech Authority)
- Fenland Diverse Community Forum
- Fenland Youth Worker Network
- Forestry Commission – East
- Forestry Commission – East Midlands
- Fosdyke Parish Council
- Fosdyke Yacht Haven Ltd
- Fulcrum Electricity Assets Limited
- Fulcrum Infrastructure Services Limited
- Fulcrum Pipelines Limited
- Gold Star Metal Traders Limited
- Goole Port
- Gosberton Parish Council
- Great Coates BESS
- Great Northern and East Lincolnshire Railway Limited
- Greater Lincolnshire Local Enterprise Partnership
- Greater Lincolnshire Nature Partnership
- Green Investment in Greater Lincolnshire
- Grimsby BESS-SBL Dec 22
- Grimsby West Housing Developer
- GSII Laceby 1 C.I.C
- GT R4 Limited (Outer Dowsing Offshore Wind)
- GTC Infrastructure Limited
- GTC Pipelines Limited
- Hafren Dyfedwy
- Harbour Energy PLC
- Harlaxton Energy Networks Limited
- Harlaxton Gas Networks Limited
- Health and Safety Executive

- Healthwatch Lincolnshire
- Hertfordshire County Council
- Hertfordshire Fire and Rescue Authority
- Hertfordshire Police and Crime Commissioner
- Historic England
- Holbeach Marsh Energy Park
- Holbeach Parish Council
- Holbeach Primary School
- Holbeach St Mark's C of E Primary School
- Holbeach United Community Sports Academy
- Home Improvement Team
- Homes England
- Hornsea 1 Limited
- Humber Bridge (A15)
- Humber Sea Terminal
- Humber Teaching NHS Foundation Trust
- Humberside Fire and Rescue Authority
- Humberside Police and Crime Commissioner
- Humbly Grove Energy Services Ltd
- Huntingdonshire District Council
- Icosa Water Services
- Independent Distribution Connection Specialists Ltd
- Independent Pipelines Limited
- Independent Power Networks Limited
- Independent Water Networks
- Indigo Pipelines Limited
- Indigo Power Limited
- Inovyn Enterprises Ltd
- InterGen UK Ltd
- James Paget University Hospitals NHS Foundation Trust
- John Harrox Primary School
- Joint Nature Conservation Committee

- Just Lincolnshire
- Kinderley Primary School
- King's Lynn and West Norfolk District Council
- Kings Lynn IDB
- Kirton Holme Golf Club
- Last Mile Electricity Ltd
- Last Mile Gas Limited
- Leep Electricity Networks Limited
- Leep Gas Networks Limited (part of Leep Utilities)
- Leep Networks
- Leicestershire County Council
- Leicestershire Fire and Rescue Authority
- Leicestershire Police and Crime Commissioner
- Let's Move Lincolnshire
- Lincoln & District Angling Association (LDAA)
- Lincoln and Lindsey Blind Society
- Lincoln Business Improvement Group
- Lincolnshire Adult Skills and Family Learning Service
- Lincolnshire Against Needless Destruction (LAND)
- Lincolnshire Autistic Society
- Lincolnshire Bat Group
- Lincolnshire Chamber of Commerce
- Lincolnshire Community Health Services NHS Trust
- Lincolnshire County Council
- Lincolnshire Dormouse Group
- Lincolnshire Energy Centre
- Lincolnshire Fire and Rescue Authority
- Lincolnshire Housing Partnership
- Lincolnshire Jewish Community
- Lincolnshire Partnership NHS Foundation Trust
- Lincolnshire Police and Crime Commissioner
- Lincolnshire Ramblers

- Lincolnshire Rural Support Network
- Lincolnshire Traveller Initiative
- Lincolnshire Walking Group
- Lincolnshire Wildlife Trust
- Lincolnshire Wolds
- Lincolnshire Youth and Community Development
- Lincs Inspire
- Lincs Rural
- Lindsey Roads Cycling Club
- London Ambulance Service NHS Trust
- Louth Town Council
- Love of Wisbech
- Lumen Technologies UK Limited
- Mablethorpe Green Energy Centre
- Mablethorpe Storage
- Marine Management Organisation
- Maritime and Coastguard Agency
- Marshland High school
- Masjid-Al-Noor
- Meridian Solar Farm Ltd
- Met Office
- Middle Level Commissioners
- Ministry of Defence
- Mua Electricity Limited
- Mua Gas Limited
- National Electricity System Operation Limited
- National Farmers Union
- National Gas
- National Gas Transmission PLC
- National Grid Electricity Distribution (East Midlands) PLC
- National Grid Electricity Distribution PLC
- National Grid Electricity Transmission Plc

- National Grid Ventures Limited
- National Grid Viking Link Limited
- National Highways
- National Highways Historical Railways Estate
- National Trust
- NATS En-route Safeguarding
- Natural England
- Natural England Norfolk (and Suffolk)
- Network Rail Infrastructure Ltd
- NHS Blood and Transplant
- NHS Cambridgeshire and Peterborough Integrated Care Board
- NHS England
- NHS Humber and North Yorkshire Integrated Care Board
- NHS Leicester, Leicestershire & Rutland Integrated Care Board
- NHS Lincolnshire Integrated Care Board
- NHS Norfolk and Waveney Integrated Care Board
- NHS Northamptonshire Integrated Care Board
- NHS Nottingham and Nottinghamshire Integrated Care Board
- NHS South Yorkshire Integrated Care Board
- No Pylons Lincolnshire
- Norfolk & Suffolk Gypsy, Roma and Traveller Service
- Norfolk and Norwich University Hospitals NHS Foundation Trust
- Norfolk and Suffolk NHS Foundation Trust
- Norfolk Biodiversity Partnership
- Norfolk Chambers of Commerce
- Norfolk Community Health & Care NHS Trust
- Norfolk County Council
- Norfolk Fire and Rescue Authority
- Norfolk Police and Crime Commissioner
- Norfolk Wildlife Trust
- North East Ambulance Service NHS Trust
- North East Lincolnshire Council

- North Kesteven District Council
- North Levels IDB
- North Lincolnshire Council
- North Lincolnshire Dementia Action Alliance
- North Lincolnshire Youth Council
- North Norfolk District Council
- North Northamptonshire Council
- North West Ambulance Service NHS Trust
- North West Anglia NHS Foundation Trust
- North Yorkshire Fire and Rescue Authority
- North Yorkshire Police and Crime Commissioner
- Northamptonshire Fire and Rescue Authority
- Northamptonshire Police and Crime Commissioner
- Northern Gas Networks Limited
- Northern Lincolnshire and Goole NHS Foundation Trust
- Northern Powergrid (Yorkshire) PLC
- Northern Powergrid Holdings Company
- Northumbrian Water (including Essex and Suffolk)
- Norwich Environmental Weekenders
- Norwich FWAG (Farming & Wildlife Advisory Group)
- Nottinghamshire and City of Nottingham Fire and Rescue Authority
- Nottinghamshire County Council
- Nottinghamshire Police and Crime Commissioner
- Octopus Energy Limited
- Optimal Power Networks Limited
- Optimus Wind Limited
- Orsted Energy Solutions
- Ossian
- Ossian Offshore Windfarm Ltd
- Outer Dowsing Offshore Wind
- Paul Bristow (Mayor of Cambridgeshire and Peterborough Combined Authority)
- Peterborough City Council

- Phillips 66 Limited
- Pinchbeck Parish Council
- Port of Boston
- Port of Grimsby
- Port of Hull
- Port of Immingham
- Port of Kings Lynn
- Port of Sutton Bridge
- Port of Sutton Bridge
- Port of Wisbech
- Quadrant Pipelines Limited
- Queen Elizabeth Hospital Kings Lynn NHS Foundation Trust
- Regulator of Social Housing
- Richard Tice (Member of Parliament for Boston and Skegness)
- Rosmini Centre Wisbech
- Rotherham, Doncaster and South Humber NHS Foundation Trust
- Royal Mail Group
- Royal Papworth Hospital NHS Foundation Trust
- Royal Society for the Protection of Birds
- RSPB
- Rutland County Council
- Saltfleetby Energy Limited
- Scotland Gas Networks PLC
- SENECA (Nu-Link)
- SENSE Lincolnshire
- Severn Gas Transportation Ltd
- Severn Trent Water
- Sir John Hayes (Member of Parliament for South Holland and the Deepings)
- Skegness Chamber of Commerce
- Skegness Mosque
- Sleaford Islamic Centre
- Society for Lincolnshire History & Archaeology

- South Central Ambulance
- South East Coast Ambulance
- South East Lincolnshire Council Partnership
- South Holland District Council
- South Holland IDB
- South Kesteven District Council
- South Killingholme Port
- South Lincs Riding Club
- South Staffordshire Water
- South Yorkshire Fire and Rescue
- South Yorkshire Mayoral Combined Authority
- South Yorkshire Police and Crime
- Southern Gas Networks Limited
- Southern Gas Networks plc
- Spalding Civic Society
- Spalding Cycling Club
- Spalding Energy Company Limited
- Spalding Energy Expansion Limited
- Spalding Energy Park Ltd
- Spalding Golf Club
- Spalding Golf Club
- Spalding PV and BESS Station
- Spalding St Paul's Primary School and Nursery
- Sport England
- SSAFA Lincolnshire
- SSE Hornsea Limited
- STALLINGBOROUGH CARBON CAPTURE CCGT
- Stallingborough PV & BESS Station
- Stark Infra-Electricity Ltd
- Stark Infra-Gas Ltd
- Stark Works
- Suffolk County Council

- Suffolk County Council
- Suffolk Fire and Rescue Authority
- Suffolk Police and Crime Commissioner
- Supporting Older People
- Surfleet Parish Council
- Sustrans (East Midlands)
- Sutterton Parish Council
- Sutton Bridge Power Generation
- Sutton St James Community Primary School
- Team Lincolnshire
- Thames Water
- The Crown Estate
- The Electricity Network Company Limited
- The Moultons Parish Council
- The Ramblers Association
- The Secretary of State for Transport
- The Victorian Society
- Thurrock Borough Council
- Transport for London
- Trinity House (General Lighthouse Authority)
- Triton Knoll OFTO Ltd
- Tudor Lodge Therapeutic School
- Tulip Academy Spalding
- UK Alternative Energy
- UK Health Security Agency
- UK Power Distribution Limited
- UK Power Networks Limited
- Uniper UK Gas Limited
- Uniper UK Limited
- United Lincolnshire Hospitals NHS Trust
- United Utilities
- University Academy Holbeach

- University Academy Long Sutton
- University of Lincoln
- Utility Assets Limited
- Vattenfall Networks Limited
- Virgin Media Limited
- Visit Lincs Coast
- Vodaphone Limited
- Wales and West Utilities Ltd
- Walking in England
- Walpole Flexible Generation
- Welland and Deeping IDB
- Wellbeing Walks Lincolnshire with COOP
- West Lindsey District Council
- West Midlands Ambulance Service University NHS Foundation Trust
- West Suffolk District Council
- West Walton Community Primary School
- Weston Hills C of E Primary School
- Weston Parish Council
- Weston St Mary's C of E Primary School
- Whaplode C of E Primary School
- Whaplode Parish Council
- White Eagle Cultural and Development Centre
- Whittlesy and District IDB
- Wisbech College and Rural
- Woodland Trust
- Yorkshire and the Humber HPT
- Yorkshire NHS Ambulance Trust
- Yorkshire NHS Ambulance Trust
- Yorkshire Water

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