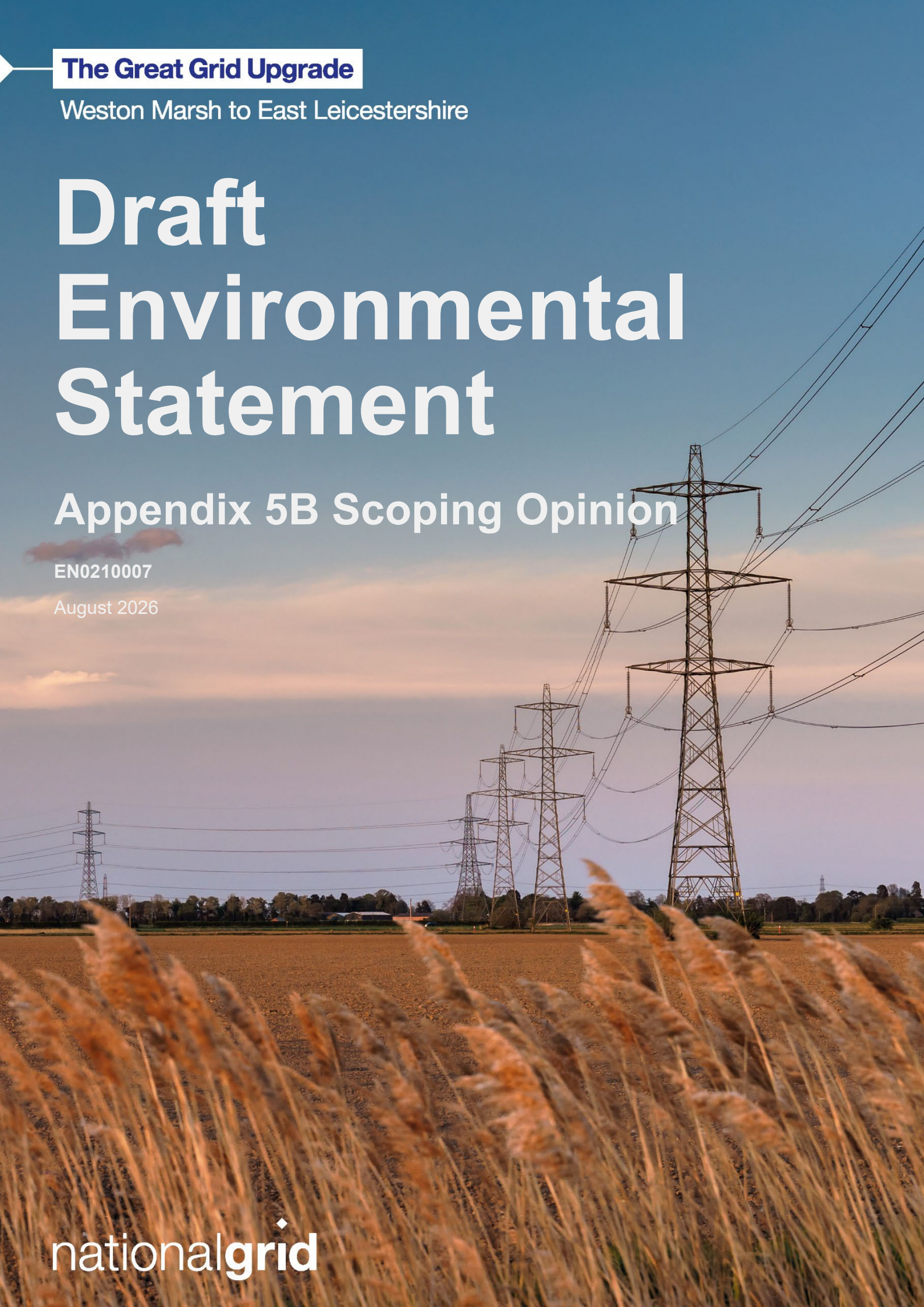




The Great Grid Upgrade

Weston Marsh to East Leicestershire

Draft Environmental Statement

Appendix 5B Scoping Opinion

EN0210007

August 2026

nationalgrid

5B. Scoping Opinion



Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Weston Marsh to East Leicestershire

Case Reference: EN0210007

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) to
Regulation 10 of The Infrastructure Planning (Environmental Impact
Assessment) Regulations 2017

17 December 2025

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1. INTRODUCTION

- 1.0.1 On 06 November 2025, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from National Grid Electricity Transmission plc (NGET) (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed Weston Marsh to East Leicestershire (the proposed development). The applicant notified the Secretary of State (SoS) under regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the proposed development and by virtue of regulation 6(2)(a), the proposed development is 'EIA development'.
- 1.0.2 The applicant provided the necessary information to inform a request under EIA regulation 10(3) in the form of a Scoping Report, available from:
- <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0210007/documents>
- 1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the proposed development as currently described by the applicant. This Opinion should be read in conjunction with the applicant's Scoping Report.
- 1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in appendix 1 in accordance with EIA regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 1.0.6 The Inspectorate has published a series of advice pages, including '[Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#)'. AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.
- 1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

['Nationally Significant Infrastructure Projects: Advice pages'](#)

- 1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Sections 3 and 4)

ID	Ref	Description	Inspectorate's comments
21.1	N/A	Flexibility	The Inspectorate notes the applicant's intention to apply a 'Rochdale Envelope' approach to maintain flexibility within the design of the proposed development. The Inspectorate expects that at the point an application is made, the description of the proposed development will be sufficiently detailed to include the design, size, capacity, technology, and locations of the different elements of the proposed development. This should include the footprint and heights of the structures (relevant to existing and proposed ground levels), as well as land-use requirements for all elements and phases of the proposed development. The description should be supported (as necessary) by figures, cross sections, and drawings which should be clearly and appropriately referenced. Where flexibility is sought, the ES should clearly set out the maximum design parameters that would apply for each option assessed and how these have been used to inform an adequate assessment in the EIA and the worst case for each aspect. The description of the proposed development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations. The need and justification to support the level of flexibility sought must be explained in the ES, including how it has been considered in the assessments through relevant parameters (temporal and spatial) and a defined worst-case for resulting environmental effects. It will be essential to ensure consistency throughout the ES and any other relevant assessments supporting the application from which the ES draws.
212	Figures	Legibility	The Inspectorate notes that there are a number of figures, which due to scale are difficult to interpret and it is not possible to read place names (for example figure 1.2 and 3.1). The ES should ensure that all figures are clear and legible in order for the information provided in them to be easily interpreted.

ID	Ref	Description	Inspectorate's comments
213	Paragraph 4.8.8	Construction compounds	The Scoping Report states that smaller satellite compounds may be needed during construction. The ES should include details such as location and how any necessary reinstatement works will be secured.
214	Paragraphs 4.8.40 to 4.8.44	Underground cabling	The Scoping Report acknowledges the potential of underground cabling. The ES should identify the number of underground cables to be laid within each trench and confirm the number of trenches required within the corridor. This should be assessed within the relevant aspect chapters of the ES.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
221	Section 4.10	Decommissioning	The Scoping Report anticipates that the transmission of electricity would continue for as long as there is a business case for doing so and decommissioning activity would occur decades into the future. The Scoping Report predicts that the environmental effects associated with decommissioning are likely to be similar to those associated with construction. The Scoping Report proposes to scope this matter out on the basis that it is not possible to assess the probable future effects as the present time due to the regulatory framework, good working practices, and the future baseline are all likely to have altered at the time of decommissioning. The Inspectorate agrees that decommissioning can be scoped out of the ES on that basis that a high-level summary of potential effects for each environmental topic would be included in an appendix to the Project Description chapter with the ES. The Inspectorate expects this to include a description of likely methods for decommissioning.

ID	Ref	Description	Inspectorate's comments
222	Table 5.5	Zone of influence (Zol)	Table 5.5 presents the Zol used for cumulative assessment of each environmental aspect. The Scoping Report states that "The rationales for the distances chosen are explained in the relevant topic chapters." Rationales of Zol for cumulative assessment have not been presented in each environmental aspect chapter. The assessment of cumulative effects should be based on a robust Zol for environmental receptors. The ES should provide further justification for selection of the geographical zone for environmental impacts and identify the receptors to be included within the assessment. It is considered that the Zol should be further informed by an understanding of receptors

ID	Ref	Description	Inspectorate's comments
			and potential impact pathways, rather than application of a distanced based zone, and this should be explained within the ES.
223	N/A	Transboundary	Any likely significant transboundary effects should be assessed within the ES. Following the adoption of this Scoping Opinion, the Inspectorate will undertake a transboundary screening, on behalf of the Secretary of State, under Regulation 32 of the 2017 EIA Regulations. The Secretary of State's duty under Regulation 32 continues throughout the application process.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Waste and materials

(Scoping Report paragraphs 4.6.8 to 4.6.15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Paragraphs 4.6.8 to 4.6.15	Waste and materials	The Scoping Report proposes to scope this matter out on the basis that a description of the nature and quantity of the materials used together with the information regarding the anticipated quantities and types of waste generated during construction would be included within the ES. These details would inform relevant assessments that consider waste generation and material consumption in their methodology. Furthermore, the Scoping Report states that a Site Waste management Plan (SWMP) is to be implemented. The Scoping Report also predicts that the operational waste and materials would be negligible due to the nature of proposed development. On the basis of the information presented in the Scoping Report, the Inspectorate agrees that a standalone ES chapter covering material assets and waste is not required. The ES should include information regarding the anticipated quantities and types of waste that will be produced during construction and operation. The EIA Approach and Methodology ES chapter should provide clear cross-referencing to where the relevant impacts are considered.

3.2 Landscape

(Scoping Report Section 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
321	Paragraph 6.7.8	Landscape designations and Landscape Character Areas (LCA) beyond the Zone of Theoretical Visibility (ZTV) and/or study area	The Scoping Report seeks to scope out effects on all landscape designations and LCAs which fall outside of the final study area (3km) and/or the extent of the ZTV. This is on the basis that there will be a lack of pathway for effect due to distance from the proposed development and/or lack of visibility. It is noted that the final study area and ZTV are to be finalised once ground-truthed field work has been completed and therefore the final ZTV may extend beyond 3km. The Applicant should make effort to agree the methodology for the ZTV and the study area with relevant consultation bodies including local authorities. Once the ZTV has been finalised, Inspectorate agrees that any impacts on landscape receptors located outside of the final ZTV are unlikely to result in significant effects. This matter can be scoped out of the ES.
322	Table 6.2	Impacts on the North Norfolk Coast National Landscape – construction and operation	The Scoping Report seeks to scope out impacts on the North Norfolk Coast National Landscape from temporary alterations to key characteristics and/or the impression of the landscape resulting from direct and/or indirect change. The Scoping Report explains that the North Norfolk Coast National Landscape is located over 30km from the scoping boundary and therefore states there will be no discernible impacts. The Inspectorate agrees that due to the distance between the proposed development and the North Norfolk Coast National Landscape, this matter may be scoped out of the ES.
323	Table 6.2	Impacts on Registered Parks and Gardens (RPG) - construction	The Scoping Report seeks to scope out impacts on all RPGs from the introduction of temporary structures, access tracks, activity and lighting associated with the construction of the new overhead line and substations.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Due to the temporary nature of construction works, the Inspectorate agrees this may be scoped out of the ES.
324	Table 6.2	Impacts on RPGs associated with reconductoring of the existing ZA overhead line – construction and operation	The Scoping Report seeks to scope out impacts on all RPGs resulting from the introduction of temporary structures, access tracks, activity and lights associated with reconductoring of the existing ZA (ZA is the NG code for the existing Cottam – Grendon – Staythorpe overhead line) during construction, and from the reconductoring of the existing ZA OHL during operation. Due to the temporary nature of construction works, and limited impacts during operation, the Inspectorate agrees this may be scoped out of the ES.
325	Table 6.2	Impacts on Grimsthorpe Castle RPG associated with substations - operation	The Scoping Report seeks to scope out impacts on the Grimsthorpe Castle RPG during operation on the basis that the nearest proposed substation is located approximately 4.5km from Grimsthorpe RPG. The Inspectorate agrees this matter may be scoped out of the ES.
326	Table 6.2	Impacts on Stapleford Hall RPG during operation	The Scoping Report seeks to scope out impacts on the Stapleford Hall RPG during operation on the basis that the RPG is located approximately 2km from the scoping boundary. The Scoping Report states that although there is potential for indirect change, it is limited by distance, local topography and vegetation. On this basis, the Inspectorate agrees this matter may be scoped out of the ES.
327	Table 6.2	Impacts on locally designated landscapes (SLAs) – during construction and operation of the new OHL and substations and from	The Scoping Report states that there are no SLAs located within the study area. During operation, the reducted OHL will have a similar appearance to the existing OHL. On this basis, the Inspectorate considers these matters may be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		reconductoring of the existing ZA OHL	
328	Table 6.2	Impacts on National Landscape Character Areas (NLCA) - of the new OHL and substations and from reconductoring of the existing ZA OHL - construction and operation	The Scoping Report seeks to scope out impacts on all NCLAs (with the exception of NLCA 46: The Fens, NLCA 75: Kesteven Uplands, and NLCA 74: Leicestershire and Nottinghamshire Wolds) during construction as these are located further than 3km from the new OHL and reconductoring works. As discussed in 3.2.1 above, the ZTV has not been finalised and therefore it is uncertain at this stage whether there may be significant effects on certain receptors beyond 3km. The Inspectorate agrees that any impacts on NLCA receptors located outside of the final ZTV, once ground truthed by field work, are unlikely to result in significant effects. The ES should assess effects on NLCA beyond 3km where likely significant effects could occur.
329	Table 6.2	Impacts on Landscape Character Areas: • Vale of Catmose LCA • Cottesmore Plateau LCA • Clay Woodlands LCA. • Vale of Belvoir LCA. • Melton LCA - construction and operation	The Scoping Report seeks to scope out impacts from alteration to key characteristics and/or the impression of the landscape resulting from indirect/direct change, on these LCAs during construction and operation. The Scoping Report explains that these LCAs are outside of the scoping boundary and only small parts are located in the study area. Furthermore, the Scoping Report states that there would be no effects from the introduction of temporary structures, access tracks, activity and lighting associated with construction of the new OHL on the basis that they are located outside of the scoping boundary and will not be affected directly. On the basis of the information provided in the Scoping Report, the Inspectorate agrees that this can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
32.10	Table 6.2	Impacts on the Melton LCA – construction and operation	The Scoping Report seeks to scope out impacts on the Melton LCA during construction and operation from the introduction of temporary structures, access tracks, activity and lighting associated with construction of the new OHL. This is because the LCA is located in the urban area of Melton Mowbray and construction will not take place in this LCA. On this basis the Inspectorate agrees this can be scoped out of the ES.
32.11	Table 6.2	Impacts on all local landscape units Landscape Character Types (LCT) and LCAs from reconducted existing ZA OHL - construction	The Scoping Report seeks to scope out impacts on LCTs and LCAs during construction from the introduction of temporary structures, access tracks, activity and lights associated with the reconductoring of the existing ZA OHL. The Scoping Report states that any changes will be temporary, of short duration and localised with a limited influence on landscape character. On this basis, the Inspectorate agrees this matter may be scoped out.
32.12	Table 6.2	Impacts on all local landscape units (LCT's and LCA's) as a result of the reconducted existing ZA OHL - operation	The Scoping Report seeks to scope impacts from alterations to key characteristics and/or the impression of the landscape, resulting from direct and/or indirect change, on local LCTs and LCAs. This is on the basis that the reconducted OHL will appear largely the same as the existing. On this basis, the Inspectorate agrees this may be scoped out of the ES.
32.13	Table 6.2	Impacts on all identified landscape designations and landscape character units beyond 3km from the order limits and/or outside the ZTV/ extent of potential visibility	The Scoping Report seeks to scope out impacts on all identified landscape designations and landscape character units outside the final study area (3 km from order limits) and/or outside the ZTV/ extent of potential visibility. This is on the basis that there is no potential for change on receptors outside of the ZTV and a small amount of potential for impacts on receptors beyond 3km from the order limits. The Inspectorate notes that the final ZTV has not yet been defined and the final ZTV may identify impacts wider than 3km. The Inspectorate agrees that any impacts on landscape receptors located outside of the final ZTV, once ground truthed by field work, are unlikely to result in significant effects. This matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		- all phases	
32.14	Table 6.2	Impacts on all identified landscape receptors from maintenance activities associated with the new OHL and reconductored existing ZA OHL - operation	The Scoping Report explains that any change would be limited and localised, would be temporary and short term in nature and localised. On this basis the Inspectorate agrees this may be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
32.15	Paragraph 4.8.40	Cable installation and reinstatement	The Scoping Report explains that it is currently assumed that the new transmission line will be an overhead line. However, the Scoping Report also explains the process involved in the event that underground cables are required. The ES should include details on any underground works required for the proposed development and assess impacts from the excavation and reinstatement of trenched areas or from trenchless techniques. The Inspectorate considers that the ES should address the potential for permanent landscape effects due to any planting restrictions introduced for any easement required.
32.16	N/A	Lighting	The Scoping Report explains that construction lighting will be directional and minimised where possible. The ES should provide details of lighting to be used for construction during hours of darkness, including for any works undertaken out of normal working hours such as night time working associated with trenchless crossings. The ES should provide information of lighting to be used during operation, such as security lighting and include an assessment of operational lighting on sensitive landscape receptors, where likely significant effects could occur.

3.3 Visual

(Scoping Report Section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
331	Table 7.2	Impacts on road and rail users – construction and operation	The Scoping Report seeks to scope out impacts on road and rail users from construction works including the introduction of temporary structures, access tracks, activity and lights associated with construction of the new overhead line and substations; and during the operational phase. The Scoping Report explains that road and rail users generally travel at speeds and would have limited visibility of construction works and of the proposed development during operation. On this basis the Inspectorate agrees this matter may be scoped out.
332	Table 7.2	Impacts on all potential visual receptors outside the assessment study area and/or with no potential visibility of construction	The Scoping Report seeks to scope out impacts on potential visual receptors from construction works including the introduction of temporary structures, access tracks, activity and lights associated with construction of the new overhead line and substations. The Scoping Report explains that there is potential for localised views of aspects of construction but due to the distance separation, effects would not be significant. On this basis the Inspectorate agrees this matter may be scoped out.
333	Table 7.2	Impacts on all potential visual receptors – construction and operation	The Scoping Report seeks to scope out impacts on all potential visual receptors from the reconductoring of the existing ZA overhead line during construction and operation. The Scoping Report explains that the works will be temporary, of short duration and with a localised influence on views and visual amenity. During operation, the ZA OHL will appear largely the same as the existing. On this basis the Inspectorate agrees this matter may be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
334	Table 7.2	Residents in individual properties outside 150m Residential Visual Amenity Assessment (RVAA) Study Area	The Scoping Report seeks to scope this matter out in relation to the introduction of the new overhead line, substations and associated lighting, on the basis that significant effects will not occur beyond 150m. The Inspectorate notes that the 150m study area proposed accords with the Landscape Institute published Residential Visual Amenity Assessment guidance methodology. However, at this stage, siting and design has not been finalised and it may be possible for views to occur beyond 150m. At this stage, the Inspectorate is unable to scope this matter out of the ES. Accordingly, the ES should include an assessment of effects visual receptors beyond 150m, where likely significant effects could occur. The applicant's attention is drawn to comments from the Lincolnshire County Council and South Holland District Council in appendix 2 of this Opinion in this regard.
335	Table 7.2	Impacts on all potential visual receptors – maintenance	The Scoping Report seeks to scope out impacts on all potential visual receptors during maintenance activities, stating that any change would be of short duration, temporary, localised and occur in the context of overhead lines and substations. On this basis the Inspectorate agrees this matter may be scoped out.

ID	Ref	Description	Inspectorate's comments
336	N/A	Lighting	The Scoping Report explains that construction lighting will be directional and minimised where possible. The ES should provide details of lighting to be used for construction during hours of darkness, including for any works undertaken out of normal working hours such as night time working associated with trenchless crossings. The ES should provide information of lighting to be used during operation, such as security lighting and include an assessment of operational lighting on sensitive visual receptors, where likely significant effects could occur.

ID	Ref	Description	Inspectorate's comments
33.7	Paragraph 4.8.40	Cable installation and reinstatement	The Scoping Report explains that it is currently assumed that the new transmission line will be an overhead line, though explains that underground cables may be required and this would be via excavated trenches. The ES should include details on any underground works required for the proposed development and assess impacts from the excavation and reinstatement of trenched areas, or from trenchless techniques. The Inspectorate considers that the ES should address the potential for permanent effects on visual amenity due to any planting restrictions introduced for any easement required.

3.4 Ecology and Biodiversity

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
34.1	Table 8.5	Impacts on statutory and non-statutory designated sites (without mobile qualifying criteria) further than 2km from the scoping boundary during maintenance of the overhead line and substations	The Scoping Report seeks to scope out impacts from maintenance activities on the basis that any impacts would be temporary, localised and of short duration. The Scoping Report confirms that no permanent habitat loss or fragmentation is anticipated during maintenance works. On the basis of the information provided in the Scoping Report, the Inspectorate agrees this may be scoped out of the ES. The term 'mobile qualifying criteria' with regards to this aspect has not been specifically defined, though it is assumed these are birds, fish and marine and terrestrial mammals as set out in appendix 8A of the Scoping Report. The Inspectorate advises that the ES should clearly define this term.
34.2	Table 8.5	Impacts on protected or otherwise notable habitats or designated sites within 200m of the affected road network as a result of changes to air quality during maintenance activities	The Scoping Report seeks to scope out impacts on ecological features during maintenance, stating that any impacts would be limited, localised, temporary and of a short duration. Furthermore, the Scoping Report states that due to separation distance, there would not be a risk of significant effects. No permanent habitat loss or fragmentation is anticipated during maintenance works. On this basis of the justification provided in the Scoping Report, the Inspectorate agrees this may be scoped out of the ES.
34.3	Table 8.5	Impacts on designated sites up to 10km and protected and notable habitats and species up to 2km from scoping boundary as a result of	The Scoping Report seeks to scope out impacts during maintenance of the new overhead line and substations from pollution (dust deposition, water) on the basis that changes in water quality and dust are not anticipated to result in significant effects upon significant effects on ecological reasons. These are presented in Chapter 10: Water environment and Chapter 14: Air Quality.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		changes in water quality and dust - maintenance	Chapter 10: Water environment states that no significant effects are anticipated due to the nature and scale of the maintenance activities and which would not cause pollution of the water environment and any physical disturbance would be highly localised. It also states that good practice methods and mitigation measures would be implemented during maintenance works. Chapter 14: air quality states that no significant effects are anticipated as a result of dust from maintenance activities on the basis that maintenance works would be temporary and infrequent. On this basis of the justification provided in the Scoping Report, the Inspectorate agrees this may be scoped out of the ES.
344	Table 8.5	Habitat gains for nesting birds such as hobby, kestrel and peregrine from the creation of permanent infrastructure	The Scoping Report seeks to scope out potential beneficial effects on kestrel, hobby and peregrine on the basis that any beneficial effects would be localised and not significant. The Inspectorate agrees with this reasoning and agrees that this matter may be scoped out of the ES.
345	Table 8.5	Impacts on all identified features from reconductoring - operation	The Scoping Report seeks to scope out impacts from reconductoring on the basis that the reconductoring section will be the same as the current baseline and no significant effects are anticipated. On this basis, the Inspectorate agrees this matter may be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
346	N/A	Sensitive environmental information	Under Regulation 12(5)(g) of the Environmental Information Regulations 2004 (EIR), public bodies have a responsibility to avoid releasing sensitive environmental information that could bring about harm to sensitive or vulnerable ecological features.

ID	Ref	Description	Inspectorate's comments
			Sections of the ES containing specific survey and assessment data relating to the location of sensitive species (for example, badgers, rare birds, and plants) or other vulnerable environmental features should be provided in separate annexes by the applicant. This approach reduces the sensitive ecological feature's risk of disturbance, damage, persecution, or commercial exploitation arising from publication. The applicant's approach should be proportionate and only use these separate annexes for species where there is a genuine risk of harm. All other assessment information should be included in an ES chapter, as normal, with a placeholder providing a justification as to why annexes have been withheld and that a full version of the ES has been submitted to the Inspectorate.
34.7	Paragraphs 8.6.46 and 8.9.3	Fish	Paragraph 8.6.46 of the Scoping Report identifies fish as likely to be found in the study area due the presence of suitable habitat. It is not clear from reading paragraph 8.9.3 of the Scoping Report of appendix 8A whether surveys for fish will be undertaken. The ES should explain any fish surveys undertaken and any necessary mitigation measures and how they would be secured.
34.8	Paragraph 8.6.38	Hazel dormice	The Scoping Report states that contact will be made with the Protected Trust for Endangered Species (PTES) to establish whether dormice are present within the scoping boundary. Appendix 8A of the Scoping Report states that a desk based assessment will be undertaken which will inform the need for survey work. The ES should explain any necessary survey work to establish locations of dormice in the study area, and to explain mitigation and how the mitigation would be secured.
34.9	Paragraph 8.6.50	Bird surveys	The Scoping Report explains that 16 vantage point locations have been identified for bird surveys and that these will be surveyed for a minimum of six hours per month. The ES should include full details of surveys undertaken and ensure that surveys are undertaken at varying times to ensure a maximum number of species are accounted for.

ID	Ref	Description	Inspectorate's comments
34.10	Paragraph 8.7.8	Habitat reinstatement	The Scoping Report states that areas of habitat loss will be reinstated and where possible, this would be reinstated to the type of habitat affected. The ES should explain if any areas will not be possible to be reinstated as per its original use, for example, for areas of easement above cable installations if underground cabling is required or from trenchless techniques.
34.11	Table 8.5	Electromagnetic fields (EMF)	The Scoping Report states that impacts on breeding and non-breeding birds from EMF will be scoped in, on the basis that EMF may result in negative impacts on wildlife, particularly birds, bats and insets. The Inspectorate considers that the ES should also assess effects on EMF and heat impacts on fish species. The applicant's attention is drawn to comments from the Environment Agency (EA) in appendix 2 of this Opinion in this regard.
34.12	Paragraph 8.7.11	Seasonal restrictions	The Scoping Report highlights that seasonal restrictions may apply in some areas. The ES should provide full details regarding the reasons for any seasonal restrictions which may be required, including relevant species, location and how any seasonal restrictions would be secured.
34.13	Appendix 8A	Receptors - great crested newts (GCN)	Appendix 8A of the Scoping Report explains that surveys for GCN will be undertaken to inform whether a Natural England District Level Licence (DLL) will be required for the proposed development. The Inspectorate understands that the DLL approach includes strategic area assessment and the identification of risk zones and strategic opportunity area maps. If a DLL is required, the ES should include information to demonstrate whether the proposed development is located within a risk zone for GCN. If the applicant enters into the DLL scheme, NE will undertake an impact assessment and inform the applicant whether their scheme is within one of the amber risk zones and therefore whether the proposed development is likely to have a significant effect on GCN. The outcome of this assessment will be documented on an Impact Assessment and Conservation Payment Certificate (IACPC). The IACPC can be used to provide additional detail to inform the

ID	Ref	Description	Inspectorate's comments
			findings in the ES, including information on the proposed development's impact on GCN and the appropriate compensation required.

3.5 Cultural Heritage

(Scoping Report Section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
35.1	Table 9.2	Physical impacts on designated heritage assets - construction	The Scoping Report proposes to scope this matter out on the basis that there will be no physical impacts on designated assets within the scoping boundary as they will be avoided by the construction works. Paragraph 9.6.1 states that embedded measures “will endeavour to” include design intervention to avoid physical and indirect impacts on both designated and non-designated heritage assets. The Inspectorate notes that impacts to heritage assets as a result of changes to their setting have been scoped in for assessment. The Inspectorate does not consider that sufficient detail has been provided at this time to justify scoping this matter out. The Inspectorate would expect the ES to provide a suitable baseline which has been agreed with the relevant consultation bodies for designated cultural heritage assets to be included in the assessment. Further detail regarding the mitigation measures to avoid physical impacts on designated assets should be provided within the ES, noting the phrase “will endeavour to” suggests there is a lack of certainty around this. The applicant should seek to agree the suitability of mitigation measures with the relevant consultation bodies and provide evidence of this within the application documents.
352	Table 9.2 and paragraph 4.7.22	Impacts to heritage assets as a result of changes to their setting for the reconductoring of existing overhead line - operation	The Scoping Report states that the change in the appearance of the existing overhead line would be minimal and as such LSE are unlikely. Paragraph 4.7.22 explains that there is no horizontal, and limited vertical realignment proposed. On this basis, the Inspectorate agrees this matter can be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
353	Table 9.2	Impacts to the access of heritage assets - operation	Considering the number of heritage assets present within, and in proximity to, the Scoping Boundary and given the lack of detail regarding the confirmed siting of the operational infrastructure, the Inspectorate considers it premature to scope out this matter. The ES should assess impacts to heritage assets during operation from all permanent infrastructure, including pylons and substations, where significant effects are likely, or information demonstrating agreement with the relevant consultation bodies that there would not be a likely significant effect.
354	Table 9.2	Physical impacts to heritage assets or impacts to heritage assets as a result of changes to their setting due to vehicular traffic and maintenance activities - operation	The Inspectorate agrees that physical impacts to, or changes to settings of heritage assets as a result of maintenance activities and traffic are not likely to result in significant effects and can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
355	Paragraphs 9.8.1 to 9.8.6	Study area	The flexible study area approach should be taken forward for both designated and non-designated assets. The applicant's attention is drawn to the response from Historic England (HE) in appendix 2 of this Opinion.
356	Paragraphs 9.8.7 to 9.8.9	Data sources	The Scoping Report lists the data sources that have been used to inform a desk study, the ES should also refer to the additional data sources identified in the responses from HE, Leicestershire County Council, Lincolnshire County Council provided in appendix 2 of this Opinion.

ID	Ref	Description	Inspectorate's comments
357	Section 9.8	Consideration of assets as a collective	The interrelationships and group value of assets located across the open fenland and the limestone uplands should be considered within the ES. The applicant's attention is drawn to the response from Lincolnshire County Council in appendix 2 of this Opinion.
358	Table 9B.1 of appendix 9.B	Survey programming	The Scoping Report sets out the timings of the Heritage Survey Strategy. These timeframes should be agreed with consultees. The applicant's attention is drawn to responses from Historic England, and Leicestershire County Council and Lincolnshire County Council which are provided in appendix 2 of this Opinion.

3.6 Water Environment

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
36.1	Table 10.7	Impact on flood conveyance arising from scaffolding structures on river banks - construction	On the basis that scaffolding installations would be temporary and managed through regulatory permitting processes, the Inspectorate agrees that effects on flood conveyance would be localised and unlikely to be significant. This matter can be scoped out of the ES. However, should the applicant choose to disapply Flood Risk Activity Permits under the Environmental Permitting Regulations (or any other relevant consents) through the DCO, this potential impact should be assessed within the ES.
36.2	Table 10.7	Impact to groundwater – surface water interactions from any dewatering for substation - construction	The Scoping Report proposes to scope the matter out on the basis that the levels of permeability and baseflow index (BFI) values for most gauged water courses are low and the construction works would be temporary. The Inspectorate notes control and management measures have been identified for temporary dewatering activities during construction and provided in appendix 4A: Initial Outline Code of Construction Practice. The Inspectorate agrees that this matter may be scoped out of the ES.
36.3	Table 10.7	Increased water pollution risk associated with operational runoff from impermeable surfaces	The Scoping Report proposes to scope this matter out on the basis that there would be no significant sources of potential pollution associated with the overhead line infrastructure once construction is complete. The Inspectorate agrees with this reasoning and agrees that this matter can be scoped out of the ES.
36.4	Table 10.7	Pollution of watercourses and physical disturbance associated with the use of machinery and vehicles for non-intrusive inspections and localised repairs - maintenance	The Scoping Report proposes to scope this matter out on the basis that the nature and scale of the maintenance activities would not cause pollution of the water environment and any physical disturbance would be highly localised. The Scoping Report states that good practice methods and mitigation measures would be applied to all maintenance works. The Inspectorate agrees with this reasoning and agrees that this matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
365	Paragraphs 4.8.40 to 4.8.44	Impacts to ground water associated with heat emissions from underground cables	The Inspectorate notes that installation of underground cables could be involved in the proposed development. If underground cables are required, the ES should assess the potential thermal impacts from these cables on sensitive groundwaters receptor during operational phase or provide evidence to demonstrate there would not be any LSE. The applicant's attention is drawn to the response from the EA provided in appendix 2 of this Opinion in this regard.
366	Paragraphs 4.8.40 to 4.8.44	Impacts to water environment associated with water quality from underground cables	The ES should assess any likely significant effects on the water environment in regard to this matter. For example, from the use of drilling fluid, should underground cables form part of the proposed development.
367	Paragraph 10.5.23	Agricultural drainage	The Scoping Report states that there are 10 Nitrate Vulnerable Zones (NVZ) which cover large spatial areas within the scoping boundary. The ES should include an assessment of any likely significant effects on retained existing agricultural drainage or the removal of this from the construction and operation of the proposed development.
368	Paragraph 10.9.1	Permanent foul drainage	Whilst it is acknowledged that the need for a permanent foul drainage solution from the proposed new substations is yet to be confirmed. The ES should confirm the overall drainage strategy with details of wastewater management for the proposed development at all stages.
369	N/A	Water resources	The proposed development is located within an area of 'serious water stress' designated by the EA. The ES should assess the potential impact of the proposed development on water resources where there is potential for significant effects to occur and include details relating to the water supply and demand requirements during all phases of the proposed development. The assessment should also consider how the water supply will be impacted by future climate conditions and the proposed development. The applicant's attention is

ID	Ref	Description	Inspectorate's comments
			drawn to the responses from Anglian Water and the EA in appendix 2 of this Opinion in this regard.
36.10	N/A	Firewater run-off	The Scoping Report does not refer to any potential impacts from firewater run-off, particularly from the operation of substations. The ES should include consideration of the potential for escape of firewater/foam and contaminants as they may contain as an impact pathway to surface and groundwater receptors. Suitable protection measures should be identified for any LSE identified. The applicant's attention is drawn to the response from the EA in appendix 2 of this Opinion in this regard.
36.11	N/A	Ordinary watercourses	The applicant should make efforts to identify flood risk for ordinary watercourses which do not have associated flood zones on the EA's Flood Map for Planning and to include this information within the assessment of flood risk. In particular, attention should be drawn to small ordinary watercourses that are located within close proximity to WMEL-B and potential fluvial flood risk flow paths in the vicinity of WMEL-A. The applicant's attention is drawn to the response from the EA in appendix 2 of this Opinion in this regard.

3.7 Geology and Hydrogeology

(Scoping Report Section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
37.1	Table 11.2	Explosion or asphyxiation as a result of ingress and accumulation of ground gas within structures - construction	The Scoping Report proposes to scope this matter out on the basis that embedded engineering measures would be implemented to mitigate the potential effect to the structures from localised areas of gas generating soils. The Inspectorate agrees this matter can be scoped out of the ES on the basis that it will be considered as part of the standard engineering design process.
37.2	Table 11.2	Damage to designated geological conservation sites associated with construction activity involving ground disturbance	The Scoping Report proposed to scope this matter out on the basis that there is no designated geological conservation sites identified within the study area at present. Subject to confirmation that there are no designated geological conservation sites within the study area as part of further baseline characterisation to support the ES, the Inspectorate agrees that this matter can be scoped out of the ES.
37.3	Table 11.2	Harm to human health and aquifers from disturbance of historical mining associated with potential emergency of sink holes - construction	The Scoping Report proposes to scope this matter out on the basis that the potential impact would be addressed by the engineering/geotechnical study and design. The Inspectorate notes that the Holwell Nature Reserve and surrounding area is affected by old ironstone mining and quarrying works. Furthermore, no aquifer mapping is present within the Scoping Report which reduces clarity on groundwater sensitivity. The applicant's attention is drawn to the respective responses on these matters from Ab Kettleby Parish Council and EA which are provided in appendix 2 of this Opinion. For these reasons, the Inspectorate does not agree this matter can be scoped out of the ES at this stage. The ES should assess the potential impacts on the human health and

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			aquifers from disturbance of historical mining associated with potential emergency of sink holes during construction.
374	Table 11.2	Harm to human health through exposure to contamination associated with presence of residual soil contamination from construction activities – operation	Whilst some ground disturbance may be necessary during maintenance, the Inspectorate assumes that this would be to land previously disturbed during construction. The Inspectorate notes that the potential release of contamination and sediment by construction activities would be assessed in the ES. Environmental and site management controls were proposed to minimise these effects as far as possible. On the basis that earthworks or materials movement during operation is suitably controlled, the Inspectorate agrees this matter can be scoped out of the ES.
375	Table 11.2	Physical effects on aquifers, such as depletion of the aquifer and increased solids/turbidity associated with groundwater control measures – operation	The Scoping Report proposes to scope this matter out on the basis that permanent dewatering requirements are not expected during the operational and maintenance phases. The Inspectorate agrees that this matter can be scoped out of the ES subject to no excavations and dewatering being required during operation.
376	Table 11.2	Structural damage associated with unstable or chemically aggressive ground conditions – operation	The Scoping Report proposes to scope this matter out on the basis that embedded engineering measures would be implemented to mitigate the potential effect to the structures from unstable or chemically aggressive ground conditions. The Inspectorate agrees this matter can be scoped out of the ES on the basis that it will be considered as part of the standard engineering design process.
377	Table 11.2	Harm to human health via exposure to contamination associated with	Whilst some ground disturbance may be necessary during maintenance, the Inspectorate assumes that this would be to land previously disturbed during construction. The Inspectorate notes that the risk of pre-existing contamination associated with disturbance of ground during construction would be assessed in the ES. Environmental and site

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		disturbance of ground that is affected by pre-existing contamination for maintenance purposes – operation	management controls were proposed to minimise these effects as far as possible. On the basis that earthworks or materials movement during operation is suitably controlled, the Inspectorate agrees this matter can be scoped out of the ES.
3.7.8	Paragraph 11.7.4	Minerals safeguarding	Paragraph 4.6.13 of the Scoping Report states that likely significant effects regarding minerals and waste was unlikely as there is limited presence of minerals and nature of the proposed development. However, this matter would be addressed through a stand-alone Minerals Sterilisation Report to be submitted as part of the DCO application if the proposed development crosses through mineral safeguarding areas for compliance with relevant policy. Whilst this approach may be familiar to relevant consultees, the applicant is reminded that all likely significant effects should be assessed within the ES. For the avoidance of doubt, any likely significant effects on mineral safeguarding should be assessed within the ES.
3.7.9	Paragraph 11.7.4	Risk of damage to structures from vibrations caused by piling	The Scoping Report proposes to scope this matter out of the geology and hydrogeology assessment on the basis that this is a matter of consideration for a structural engineer. The Inspectorate agrees that this matter is outside the scope of the geology and hydrogeology assessment, however any likely significant effects should be assessed as appropriate within the Noise and Vibration chapter.

ID	Ref	Description	Inspectorate's comments
3.7.10	N/A	Aquifers status	The ES should include figures to show the location and classification of aquifer identified within the study area to support the assessment of groundwater sensitivity. The applicant's attention is drawn to the response from EA in appendix 2 of this Opinion in this regard.

3.8 Agriculture and Soils

(Scoping Report Section 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
38.1	Table 12.12	Impacts on agricultural land quality - operation	The Scoping Report states that periodic vehicle access for routine maintenance and emergency repairs may require temporary access tracks and small compound areas but these are likely to be limited in extent. It states that all soil handling would be undertaken in line with published good practice. At present, the location and extent of temporary access tracks and compounds are not determined. On this basis, the Inspectorate does not agree this matter can be scoped out. The ES should assess any likely significant effects on agricultural land quality during the operation and maintenance phase based on the expected maximum extent of any routine maintenance activities.
382	Table 12.12	Impacts on soil ecosystem services - operation	The Scoping Report notes that maintenance works would impact soils at a smaller scale than construction and that disturbance to soils during maintenance would be undertaken in accordance with good practice soil handling methods. At present, the location and extent of temporary access tracks and compounds are not determined. On this basis, the Inspectorate does not agree this matter can be scoped out. The ES should assess any likely significant effects on soil ecosystem services during the operation and maintenance phase based on the expected maximum extent of any routine maintenance activities.
38.3	Table 12.12	Impacts on agricultural land holdings - operation	The Inspectorate acknowledges that temporary access tracks and small compound areas required for maintenance activities and emergency repairs are likely to be smaller in extent than during construction. At present, the location and extent of temporary access tracks and compounds are not determined. On this basis, the Inspectorate does not agree this matter can be scoped out. The ES should assess any likely significant effects on agricultural holdings during the operation

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			and maintenance phase based on the expected maximum extent of any routine maintenance activities.

ID	Ref	Description	Inspectorate's comments
384	Paragraph 12.4.1	Study area	The Scoping Report states that the study area for the agricultural land and soils assessment covers the scoping boundary only, and there is no buffer as it describes the impacts regarding loss of agricultural land relate only to those soils directly affected. The ES should consider any adjoining agricultural land if that might be affected (for example from changes to drainage patterns and land holdings) and should provide a clear justification for the extent of the study area chosen and how this relates to the extent of the likely impacts. The study area should be clearly depicted on figures to aid understanding.
385	Paragraphs 12.5.22 to 12.5.24	Future baseline	The Inspectorate notes the future baseline considers the longer-term effects in relation to climate change, including greater rainfall intensity and droughts which may affect the soil conditions, land grade and farming practices. The applicant should also take into account the effects from any short-term changes when consider the future baseline as such trends may affect farming practices such as increased irrigation.
386	N/A	Agricultural land classification (ALC) and best and most versatile (BMV) agricultural land	The ES should quantify the areas of land according to Grades 1 to 5 of the ALC, including differentiating between Grades 3a and 3b. The ES should contain a clear tabulation of the areas of land in each ALC to be temporarily or permanently lost as a result of the proposed development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided. Consideration should be given to the use of BMV land in the applicant's discussion of alternatives.
387	N/A	Impact on agricultural operation –	The ES should include an assessment of any likely significant effects on agriculture routine activities, such as irrigation from the construction and operation of the proposed development.

ID	Ref	Description	Inspectorate's comments
		construction and operation	
388	N/A	Impact on agricultural production – construction and operation	The ES should identify the agricultural land uses that will be displaced by the proposed development. Potential effects on farm businesses, loss of agricultural production and implications for food security should be considered where there is potential for significant effects to occur. Effects such as severance to farm access or changes to the scale and long-term viability of farm holdings affected by the proposed development should also be considered. This should consider both effects alone and cumulatively with other projects.

3.9 Traffic and Transport

(Scoping Report Section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
39.1	Table 13.2	Impacts of hazardous loads on general public - construction	Table 13.2 states that there is low potential for significant effects on the general public as a result of a road traffic accident leading to a Hazardous Load spill. The Scoping Report proposes to scope this matter out on the basis that low numbers of fuel for construction plant would be expected to be delivered during construction. However, there is no information of the locations, routes and frequency of the hazardous loads provided in the Scoping Report to demonstrate that no likely significant effect is anticipated. The Inspectorate is not in position to scope this matter out at this stage. The ES should therefore assess the likely significant effects of the transportation of hazardous loads during the construction phase.
39.2	Table 13.2	Impacts of closure of railway line on railway users - construction	The Scoping Report states that blockades/temporary closures to install protection/temporary works would occur overnight and tower locations would be designed to avoid the rail line to avoid/minimise impact. Given the stage of the proposed development and the location of tower are not confirmed yet. The Inspectorate considers that there is insufficient evidence at this stage to scope this matter out of the assessment. The ES should include an assessment of the potential impacts to the railway network and operational rail safety, where there is potential for likely significant effects to occur. The applicant should make effort to agree the approach to assessment with relevant consultation bodies including Network Rail.
39.3	Table 13.2	Impacts of closure of navigable waterways to navigable waterway users - construction	The Scoping Report states that temporary culverts or temporary spanned bridges would be used for construction traffic to cross navigable waterways. Given the stage of the proposed development and the lack of information on the requisite construction methods, the Inspectorate considers that there is insufficient evidence at this stage to scope this matter out. The ES should assess any likely significant effects on

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			navigable waterway users from the construction and use of temporary culverts or temporary spanned bridges across navigable waterways.
394	Table 13.2	Impacts of increased traffic volumes associated with operational staff trips on road users, public transport users (bus), pedestrians and cyclists	The Scoping Report states that the number of operational and maintenance trips are anticipated to be lower than 10% of existing traffic and movements. The ES should provide a description of the likely number and type of vehicles required during all phases of development to demonstrate that the number of trips would not trigger the screening thresholds specified in the Institute of Environmental Management and Assessment (IEMA) Guidelines – Environmental Assessment of Traffic and Movement (2023), the Inspectorate agrees this matter can be scoped out from further assessment. Should the number of movements exceed this threshold, the Inspectorate expects the ES to assess the likely significant effects of increased operational traffic on these receptors.
395	Table 13.2	Impacts of vehicle crossing points on railway users - operation	The Scoping Report proposes to scope this matter out on the basis that there are no impacts anticipated as maintenance vehicles would only cross railway lines using existing highway crossing point. The Inspectorate agrees to scope this matter out on the basis that there is no new vehicle crossing points on railway required during operation.

ID	Ref	Description	Inspectorate's comments
396	Paragraph 13.4.2	Study area	Whilst it is acknowledged that the study area is yet to be confirmed, this should be informed by the extent of the affected road network and agreed with relevant statutory consultees. The ES should include a figure to illustrate the extent of the study area used as the basis for the assessment.
397	N/A	Emergency services	The ES should consider the potential for significant effects on emergency services associated with any temporary road closures and/or temporary roadworks.

3.10 Air Quality

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Table 14.5	Increase in traffic from construction activity and the increase of vehicle movement in the area at ecological and human receptors	The Scoping Report states that there potential for significant effects associated with the deterioration in local air quality (NO₂, NO_x, PM₁₀ and PM_{2.5}) at local human and ecological receptors. However this will be scoped out if the EPUK/IAQM indicative criteria thresholds are not met. Provided the ES can demonstrate that this is the case, the Inspectorate agrees the matter can be scoped out of from further assessment. Should this threshold be exceeded, the Inspectorate expects the ES to assess the likely significant effects of increased operational and maintenance traffic on these receptors. The Inspectorate also agrees that vehicle emissions associated with diverted traffic can be scoped out of the ES, provided it can be demonstrated that the predicted volumes of diverted traffic would not exceed the relevant indicative criteria for air quality assessment set out in the IAQM guidance.
3.10.2	Table 14.5	Pollutant emissions from traffic and activities associated with operation and maintenance at ecological and human receptors	The Scoping Report states that the number of operational and maintenance trips are not anticipated to exceed the Institute of the Environmental Protection UK and Air Quality Management (IAQM) (2017) Land-Use Planning & Development Control: Planning for Air Quality screening criteria. Provided the ES can demonstrate that this is the case, the Inspectorate agrees the matter can be scoped out of from further assessment. Should the number of movements exceed this threshold, the Inspectorate expects the ES to assess the likely significant effects of increased operational and maintenance traffic on these receptors. The Inspectorate also agrees that significant effects from dust sources are unlikely due to the infrequent, temporary and transient nature of operational and maintenance phase activities. This matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.103	Paragraph 14.4.3	Study areas	The Scoping Report states that the study areas will be refined. These areas should be agreed with relevant consultees.
3.104	N/A	Guidance	The applicant's attention is drawn to the Defra advice 'PM2.5 Targets: Interim Planning Guidance'. The ES should explain how key sources of air pollution within the proposed development have been identified and how action has been taken to minimise emissions of PM2.5 or its precursors.

3.11 Noise and Vibration

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Table 15.2 and section 4.6 and table 4A.2 of appendix 4A	Vibration impact from construction traffic at NSRs within the study area – construction	The Scoping Report proposes to scope out this matter for the phase identified on the basis that vibration from traffic on the public highway is caused by irregularities in the road surface. Where the road surface is free from irregularities, such as potholes, significant vibration effects would not be expected, even at relatively short distances. The Control and Management Measures provided in section 4A.6 of appendix 4A Initial Outline Code of Construction Practice states that the Construction Traffic Management Plan (CTMP), an Environmental Control Plan, will be secured as a Requirement of the DCO. Table 4A.2 Environmental Control Plans (ref TT01) states will specify measures to prevent nuisance from vehicle movements and ensure the maintenance of the public highway. These Control and Management measures should also consider the presence of underground utility infrastructure. On this basis, the Inspectorate agrees this matter can be scoped out. However in the event that substations includes piled foundations, this should be subject to further assessment.
3.11.2	Table 15.2	Noise impact from overhead lines at NSRs within the study area – operation	The Scoping Report proposes to scope out this matter for the phase identified on the basis that operational noise from the overhead line is not likely to be significant at nearby NSRs under any weather conditions owing to the proposed 'triple Araucaria' conductor bundle (section 15.6 of the Scoping Report). The applicant also proposes that, should the iterative design process result in alternative conductor types being used, consideration for LSE will be considered within the ES. The Inspectorate is content with this approach, however, should alternative conductor types be proposed, the applicant should submit further technical information as part of the development consent to support scoping out this matter from the noise and vibration assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.113	Table 15.2	Noise from substation switchgear and auxiliary plant at NSRs within the study area – operation	Given the nature and anticipated frequency of noise from substation switchgear and auxiliary plant, the Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of the ES.
3.114	Table 15.2	Vibration impact at NSRs within the study area – operation	The Scoping Report proposes to scope out this matter on the basis that there will be vibration isolation measures incorporated into the design of the substation plant and as with these measures, no vibration impact at NSRs is anticipated. Other than these, the Scoping Report states that there are no sources of operational vibration proposed as part of the proposed development. The Inspectorate is content with this approach subject to no sources of operational vibration proposed for the phase identified.
3.115	Table 15.2	Noise or vibration impact from maintenance activities – operation	The Inspectorate agrees that noise and vibration from short term maintenance activities can be scoped out of the ES. However, the ES should consider the potential for more substantial activity to be required as part of maintenance, eg replacement of components of the proposed development, which would be more akin to the impacts described during the construction stage. The ES should include an assessment of any likely significant effects from such activities.

ID	Ref	Description	Inspectorate's comments
3.116	Paragraphs 15.8.4 and 15.8.5	PRoW and public open spaces and outdoor sports/recreation community facilities	The Scoping Report states that an LSE on these receptors will be unlikely due to transient nature of their use, but it does not confirm whether these receptors will be scoped in or out. The ES should be clear in what is scoped in or out of the assessment.

3.12 Socio-economics, Recreation and Tourism

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.121	Table 16.15	Potential employment and training benefits across the supply chain on the local labour market receptors - construction	The Inspectorate agrees that this matter can be scoped out of the ES on the basis that operation of the proposed development would generate a limited number of additional jobs and is therefore unlikely to give rise to any significant effects with respect to this matter.
3.122	Table 16.15	Potential disruption to local users of promoted recreational routes and PRow of significance from temporary closure or diversions - operation	The Scoping Report states that significant effects on promoted recreational routes and PRow of significance in the local area are not anticipated during operation. It states that disruption to these receptors during maintenance would be avoided as far as possible and managed with a PRow Management Plan. On this basis, and due to the infrequent, temporary and transient nature of operational and maintenance phase activities, the Inspectorate agrees that significant effects would be unlikely. The Inspectorate agrees that this matter can be scoped out of the ES.
3.123	Table 16.15	Potential temporary or permanent loss of development land, utilities and renewables infrastructure - operation	The Scoping Report states that no significant effects on development land and utilities and renewable infrastructure are anticipated during operation, and that disruption to development land during maintenance would be avoided as far as possible. The Inspectorate agrees that significant effects are unlikely due to the infrequent, temporary and transient nature of operational and maintenance phase activities. This matter can be scoped out of the ES.
3.124	Table 16.15	Potential temporary or permanent loss of open space - operation	The Scoping Report states that no significant effects on open space are anticipated during operation, and disruption to open space during operation would be avoided as far as possible. Given the limited amount of open space within the Scoping Boundary (as depicted on Figure 16.2), and taking into account the infrequent, temporary and transient

			nature of operational and maintenance phase activities, the Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of the ES.
3.125	Table 16.15	Potential disruption during operational activities (amenity & severance) affecting communities, community facilities, visitor attractions and businesses (indirect) - operation	On the basis that access to these receptors would be reinstated post construction, and that their ongoing use would be unaffected during operation, the Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of the ES. The ES should demonstrate that such reinstatement (including amenity levels) is achievable and should uncertainty remain, an assessment of likely significant effects should be provided. The applicant's attention is drawn to Ab Kettleby Parish Council's consultation response provided in appendix 2 of this Opinion.
3.126	Table 16.15	Potential temporary or permanent loss of or impact on receptors (land take) affecting communities, community facilities, visitor attractions and businesses (direct) - operation	The Scoping Report states that the proposed development has been designed to avoid direct effects on these receptors as far as possible and that should this change, and these receptors are likely to be directly impacted, these would be included in the assessment as appropriate for the ES. Subject to this caveat, the Inspectorate agrees that this matter can be scoped out of the ES.
3.127	Table 16.15	Potential for impacts on the availability of tourism accommodation on tourism accommodation - operation	The Inspectorate agrees that the scale of operational employment generated is unlikely to result in significant effects on tourism accommodation availability and that this matter can be scoped out of the ES.
3.128	Table 16.15	Potential temporary or permanent loss of residential property, access, and impact on	The Scoping Report states that the emerging preferred corridor for the proposed development and substation siting areas would avoid acquisition or over-sail of residential properties. Indirect effects such as access and noise would be managed through the proposed Construction Transport Management Plan (CTMP) and Construction

		amenity – construction, operation	Environment Management Plan (CEMP) to reduce the potential for significant effects. The Inspectorate agrees that this matter can be scoped out of the ES on this basis. However, should acquisition or over-sail of residential properties be required, the potential loss of property, access and impact on amenity should be assessed, where significant effects are likely.
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3.13 Health and Wellbeing

(Scoping Report Section 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Table 17.8	Potential temporary and permanent land take affecting residential properties, community facilities and businesses on local residents, users of community facilities and owners/operators of businesses – construction	The Scoping Report states that during the construction phase, the proposed development will be undertaken so as to avoid temporary or permanent land take affecting residential properties, community facilities and businesses. The Inspectorate agrees that this matter can be scoped out of the ES on this basis. However, should acquisition or over-sail of residential properties be required, the potential loss of property should be assessed, where significant effects are likely.
3.13.2	Tables 13.2 and 17.8	Construction traffic increasing journey times affecting access to community facilities on local residents – construction	The Scoping Report states that disruption due to construction traffic will be localised and temporary and not likely to affect access at population level. Table 13.2 of the Scoping Report identifies LSE on road users, public transport users (bus), pedestrians and cyclists as a result from short term and temporary construction traffic volumes and routes. For these reasons, the Inspectorate cannot scope this matter out at this time. The ES should assess LSE of construction traffic increasing journey times affecting access to community facilities on local residents
3.13.3	Table 17.8	Potential for soil and water contamination due to the emission of harmful substances on local residents and owners/operators of	The Scoping Report states that the proposed development will comply with legally required standards to minimise the risk of exposure of the population to harmful substances. Together with the pollution the control measures set out in appendix 4A Initial Outline CoCP, the Inspectorate agrees that this matter can be scoped out.

		businesses – construction	
3.134	Table 17.8	Increased employment for the operational and maintenance workforce on the wider study area population – operation	The Scoping Report proposes to scope out this matter on the basis that there is limited potential for new employment generation and associated income opportunities during operation. The Inspectorate agrees that significant effects are not likely and that this matter can be scoped out of the ES.
3.135	Table 17.8	Potential reduced opportunities for access for physical activity, and increased severance on local residents and users of PRow – operation	The Scoping Report states that there will no permanent closures or diversions of promoted recreational routes and PRow during operation. On this basis, the Inspectorate agrees that this matter can be scoped out of the ES.
3.136	Table 17.8	Potential permanent land take leading to changes in access to open space on local residents and users of open spaces – operation	The Scoping Report states that it is unlikely that there will be permanent changes to access to open space during operation. On this basis, the Inspectorate agrees that this matter can be scoped out of the ES.
3.137	Table 17.8	Potential for permanent land take affecting residential properties, community facilities and businesses on local residents and owners/operators of businesses – operation	The Scoping Report states that the proposed development will avoid land take affecting residential properties, community facilities and businesses. On this basis, the Inspectorate agrees that this matter can be scoped out of the ES.

3.138	Table 17.8	Potential permanent impacts associated with the generation of EMFs on local residents – operation	The Scoping Report states that the proposed development would be designed to comply with existing National Grid standards and the guidelines and policies detailed in NPS-EN5, including the International Commission on Non-Ionizing Radiation Protection guidelines to ensure that all equipment will comply with public EMF exposure limits. It confirms that an EMF report will be prepared as part of the proposed development but separate to the EIA process. The Inspectorate agrees that an assessment of the actual effects from EMFs during operation can be scoped out provided that the ES contains a summary of the compliance report and confirms that there is no potential for significant environmental effects. The applicant's attention is also drawn to the UK Health Security Agency response provided in appendix 2 of this Opinion.
3.139	Table 17.8	Potential for soil and water contamination due to the emission of harmful substances on local residents and owners/operators of businesses – operation	The Scoping Report states that during the operation of the project will comply with legally required standards to minimise the risk of exposure of the population to harmful substances. On this basis, the Inspectorate agrees that this matter can be scoped out of the ES.

3.14 Climate Change

(Scoping Report Section 18)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Table 18.3	Maintenance of the built asset components and systems - operation	The Scoping Report states that the proposed development would not be designed with the expectation of any significant plant maintenance and repair activities being required. The Inspectorate agrees that this matter can be scoped out from the ES on this basis.
3.14.2	Table 18.3	Refurbishment	Table 18.3 states that the proposed development would not be designed with the expectation of refurbishment being required. The Inspectorate notes this contradicts the potential refurbishment activities detailed in paragraphs 4.9.7 – 4.9.11. Nevertheless, given the nature of these activities, the Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out from the ES.
3.14.3	Table 18.3	Operational energy use and operational water use	The Inspectorate considers that this matter can be scoped out of the ES on the basis that minimal operational energy use or water use is expected. The Inspectorate notes that water use during construction is not explicitly scoped in and the applicant's attention is drawn to ID 3.6.9 of this Opinion. For the avoidance of doubt, the Inspectorate expects any likely significant effects from water use for concrete batching, dust suppression and welfare to be assessed.
3.14.4	Table 18.3	Users' utilisation of infrastructure	The Scoping Report states that the proposed development is not expected to have any direct and quantifiable impact on greenhouse gas (GHG) emissions from electricity use that is distinct from wider national trends on grid decarbonisation. The Inspectorate agrees that this matter can be scoped out from the ES on this basis.
3.14.5	Table 18.3	Deconstruction, Transport, Waste processing for recovery and disposal	As noted in ID 2.2.1 of this Opinion, the Inspectorate agrees that decommissioning impacts can be scoped out of the ES.

3.15 Major Accidents and Disasters

(Scoping Report Section 19)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.151	Paragraph 19.7.1 and Table 19A.1	Potential vulnerability of the proposed development to a major accident or disaster as set out in appendix 19.A of the Scoping Report - all phases	Table 19A.1 lists the potential natural hazards which the applicant does not consider the proposed development to be vulnerable to or be a potential cause of. The Inspectorate agrees that significant effects on/from natural hazards are not likely and that these matters can be scoped out of the ES based on the reasoning set out in appendix 19A, apart from flood risk. The Inspectorate notes that flood risk is scoped out of the Major Accidents and Disaster ES chapter on the basis that a proposed FRA will be submitted with the ES. The Inspectorate is content with this approach on the basis that the FRA assesses the vulnerability of the proposed development to flood risk and the potential for the proposed development to increase flood risk elsewhere.
3.152	Paragraph 19.7.1 and Table 19A.	Potential for the proposed development to exacerbate existing hazard as set out in appendix 19.A of the Scoping Report – all phases	The applicant proposes to scope out this matter on the basis that the proposed development is unlikely to generate any potential significant effects on the environment if a major accident or disaster were to occur. The Inspectorate is content with this approach. The ES however should identify existing utility infrastructure, the applicant's attention is drawn to responses from Anglian Water and the Health and Safety Executive provided in Appendix 2 of this Opinion.

ID	Ref	Description	Inspectorate's comments
3.153	Table 19A.1	Standards, measures and processes	Notwithstanding the Inspectorate's agreement to scope out an assessment of effects for Major Accidents and Disasters from the ES, the description of the proposed development in the ES should describe any standards/ measures and processes which would be relied on to exclude likely significant effects and explain how they would be secured and implemented as part of the DCO.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Secretary of State for Defence	Ministry of Defence
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Ab Kettleby Parish Council
	Algarkirk Parish Council
	Arthingworth Parish Council
	Asfordby Parish Council
	Ashley Parish Council
	Aslackby and Laughton Parish Council
	Barkby and Barkby Thorpe Parish Council
	Barton Seagrave Parish Council
	Belton-in-Rutland Parish Council
	Billesdon Parish Council
	Billingborough Parish Council
	Bourne Town Council
	Bozeat Parish Council
	Brafield on the Green Parish Council
	Brampton Ash Parish Council
	Braybrooke Parish Council
	Brixworth Parish Council
	Broughton & Old Dalby Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Broughton Parish Council
	Buckminster Parish Council
	Burton & Dalby Parish Council
	Burton Latimer Town Council
	Burton on the Wolds, Cotes & Prestwold Parish Council
	Castle Ashby Parish Council
	Castle Bytham Parish Council
	Clarborough and Welham Parish Council
	Clawson, Hose & Harby Parish Council
	Clipston Parish Council
	Cogenhoe & Whiston Parish Council
	Colsterworth and District Parish Council
	Corby Glen Parish Council
	Cowbit Parish Council
	Crowland Parish Council
	Croxton Kerrial & Branston Parish Council
	Deeping St. Nicholas Parish Council
	Denton Parish Council
	Desborough Town Council
	Dingley Parish Council
	Dowsby Parish Council
	Draughton Parish Council
	Earls Barton Parish Council
	East Farndon Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	East Langton Parish Council
	Eaton Parish Council
	Ecton Parish Council
	Edenham Parish Council
	Finedon Town Council
	Fosdyke Parish Council
	Foxton Parish Council
	Freeby Parish Council
	Frisby on the Wreake Parish Council
	Gaddesby Parish Council
	Garthorpe & Coston Parish Council
	Gosberton Parish Council
	Great Bowden Parish Council
	Great Cransley Parish Council
	Great Doddington Parish Council
	Great Harrowden Parish Council
	Great Oxendon Parish Council
	Grendon Parish Council
	Grimston, Saxelbye and Shoby Parish Council
	Haconby & Stainfield Parish Council
	Hallaton Parish Council
	Hannington Parish Council
	Hardwick Parish Council
	Harrington Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Hickling Parish Council
	Hoby with Rotherby Parish Council
	Holbeach Parish Council
	Holcot Parish Council
	Houghton on the Hill Parish Council
	Hungarton Parish Council
	Illston on the Hill Parish Council
	Irchester Parish Council
	Irnham Parish Council
	Irthlingborough Town Council
	Isham Parish Council
	Kettering Town Council
	Kibworth Harcourt Parish Council
	Kirby Bellars Parish Council
	Kirkby Underwood Parish Council
	Knossington & Cold Overton Parish Council
	Lamport & Hanging Houghton Parish Council
	Little Bytham Parish Council
	Little Harrowden Parish Council
	Loddington Parish Council
	Lubenham Parish Council
	Maidwell Parish Council
	Market Overton Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Mawsley Parish Council
	Mears Ashby Parish Council
	Medbourne Parish Council
	Morton & Hanthorpe Parish Council
	Northampton Town Council
	Old Parish Council
	Orlingbury Parish Council
	Pinchbeck Parish Council
	Podington Parish Council
	Pointon and Sempringham Parish Council
	Pytchley Parish Council
	Quadring Parish Council
	Queniborough Parish Council
	Rearsby Parish Council
	Rippingale Parish Council
	Rolleston Parish Council
	Rothwell Town Council
	Rushden Parish Council
	Rushton Parish Council
	Scaldwell Parish Council
	Scalford Parish Council
	Skillington Parish Council
	Somerby Parish Council
	South Croxton Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	South Witham Parish Council
	Sproxtton Parish Council
	Stoke Albany Parish Council
	Stoke Rochford & Easton Parish Council
	Stoke Rochford and Easton Parish Council
	Stretton Parish Council
	Surfleet Parish Council
	Sutterton Parish Council
	Swayfield Parish Council
	Swinstead Parish Council
	Sywell Parish Council
	The Moultons Parish Council
	Thorpe Malsor Parish Council
	Thrussington Parish Council
	Tilton on the Hill & Halstead Parish Council
	Toft with Lound and Manthorpe Parish Council
	Tugby and Keythorpe Parish Council
	Tur Langton Parish Council
	Twyford and Thorpe Satchville Parish Council
	Upper Broughton Parish Council
	Walgrave Parish Council
	Waltham on the Wolds and Thorpe Arnold Parish Council
	Wellingborough Town Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Weston By Welland Parish Council
	Weston Parish Council
	Whaplode Parish Council
	Whissendine Parish Council
	Wigtoft Parish Council
	Wilbarston Parish Council
	Wilby Parish Council
	Witham on the Hill Parish Council
	Wollaston Parish Council
	Wymeswold Parish Council
	Wymondham & Edmondthorpe Parish Council
	Yardley Hastings Parish Council
The Environment Agency	Environment Agency
Natural England	Natural England
The Forestry Commission	The Forestry Commission
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The relevant internal drainage board	Black Sluice Internal Drainage Board
	Upper Witham Internal Drainage Board
	Trent Valley Internal Drainage Board
	South Holland Internal Drainage Board
	Welland and Deepings Internal Drainage Board
The Canal and River Trust	The Canal and River Trust

SCHEDULE 1 DESCRIPTION	ORGANISATION
Trinity House	Trinity House
The relevant Highways Authority	Leicestershire County Council Highways Department
	Lincolnshire County Council Highways Department
	North Northamptonshire Council Highways Department
	West Northamptonshire Council Highways Department
	National Highways
The Civil Aviation Authority	Civil Aviation Authority
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England
The Coal Authority	Mining Remediation Authority
The Crown Estate Commissioners	The Crown Estate
The relevant police authority	Police and Crime Commissioner for Lincolnshire
	Police and Crime Commissioner for Leicestershire
	Northamptonshire Police, Fire and Crime Commissioner
The relevant ambulance service	East Midlands Ambulance Service NHS Trust
The relevant fire and rescue authority	Leicestershire Fire and Rescue Service
	Lincolnshire Fire and Rescue Service
	Northamptonshire Fire and Rescue Service

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

‘Statutory undertaker’ is defined in The APFP Regulations (as amended) as having the same meaning as in section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Northamptonshire Integrated Care Board
	NHS Lincolnshire Integrated Care Board
	NHS Leicester, Leicestershire and Rutland Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	East Midlands Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Limited
	National Highways Historical Railways Estate
	Network Rail
Canal Or Inland Navigation Authorities	The Canal and River Trust
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	Environment Agency
The relevant water and sewage undertaker	Anglian Water
	Severn Trent
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc

STATUTORY UNDERTAKER	ORGANISATION
	Southern Gas Networks Plc
	CNG Services Limited
	Energy Assets Pipelines Limited
	ES Pipelines Limited
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Limited
	Last Mile Gas Limited
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Infra-Gas Limited
	National Gas
The relevant electricity generator with CPO Powers	Corby Power Limited
	Green Hill Solar Farm Limited
	Meridian Solar Farm Limited
	Spalding Energy Company Limited
	Spalding Energy Expansion Limited
	Spalding Energy Park Limited
	GT R4 Limited
	Kilinside Energy Park Limited

STATUTORY UNDERTAKER	ORGANISATION
	<i>On 5 December 2025 the Inspectorate become aware that Kilinside Energy Park Limited should have been identified as a prescribed consultation body; however, this consultee was not identified due to a technical error. Kilinside Energy Park Limited provided a response to the consultation within the 28 day period and this response is included in appendix 2 of this Opinion. The consultee has been made aware of this on 17 December 2025.</i>
The relevant electricity distributor with CPO Powers	National Grid Electricity Distribution (East Midlands) Limited
	Advanced Electricity Networks Limited
	AGR Networks Limited
	Aidien Limited
	Aurora Utilities Limited
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Limited
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Limited
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Limited
	Leep Electricity Networks Limited
	Mua Electricity Limited

STATUTORY UNDERTAKER	ORGANISATION
	Optimal Power Networks Limited
	Stark Infra-Electricity Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Energy System Operator (NESO)

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
Bedford Borough Council
Blaby District Council
Boston Borough Council
Buckinghamshire Council
Cambridgeshire County Council
Charnwood Borough Council
Cherwell District Council
Leicester City Council
Peterborough City Council
Derbyshire County Council
Fenland District Council
Harborough District Council
Hinckley and Bosworth Borough Council

LOCAL AUTHORITY
Huntingdonshire District Council
Kings Lynn and West Norfolk Borough Council
Leicestershire County Council
Lincolnshire County Council
Melton Borough Council
Milton Keynes City Council
Newark and Sherwood District Council
Norfolk County Council
North East Lincolnshire Council
North Kesteven District Council
North Lincolnshire Council
North Northamptonshire Council
North West Leicestershire District Council
Nottinghamshire County Council
Oadby and Wigston Borough Council
Oxfordshire County Council
Rugby Borough Council
Rushcliffe Borough Council
Rutland County Council
South Holland District Council
South Kesteven District Council
Staffordshire County Council
Stratford on Avon District Council
Warwickshire County Council

LOCAL AUTHORITY
West Northamptonshire Council

TABLE A4: THE MARINE MANAGEMENT ORGANISATION

Section 42(1)(a) of the PA2008 requires consultation with the Marine Management Organisation in any case where the proposed development would affect, or would be likely to affect, any of the areas specified in subsection 42(2).

ORGANISATION
The Marine Management Organisation <i>On 16 December 2025 the Inspectorate become aware that the Marine Management Organisation should have been identified as a prescribed consultation body; however due to a technical error, this consultee was not identified. The consultee was informed of this omission on 16 December 2025.</i>

TABLE A5: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
Greater Lincolnshire Combined County Authority

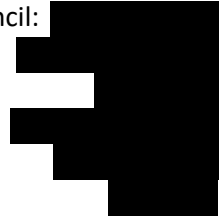
APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Ab Kettleby Parish Council
Anglian Water
Blaby District Council
Charnwood Borough Council
Croton Kerrial & Branston Parish Council
Environment Agency
Grimston, Saxelbye and Shoby Parish Council
Health and Safety Executive
Hickling Parish Council
Historic England
Houghton on the Hill Parish Council
Huntingdonshire District Council
Kilnside Energy Park Limited
Kings Lynn and West Norfolk Borough Council
Leicestershire County Council
Leicestershire Fire and Rescue Service
Lincolnshire County Council
Milton Keynes City Council
Mining Remediation Authority
Ministry of Defence
National Gas
National Highways

NATS En-Route Safeguarding
Natural England
Norfolk County Council
North Kesteven District Council
North Lincolnshire Council
North West Leicestershire District Council
Podington Parish Council
Rippingale Parish Council
Royal Mail Group
Rugby Borough Council
Rushcliffe Borough Council
Scalford Parish Council
South Holland District Council
South Holland Internal Drainage Board
South Kesteven District Council
Sutton Parish Council
The Forestry Commission
The Moultons Parish Council
Trinity House
United Kingdom Health Security Agency
Waltham on the Wolds and Thorpe Arnold Parish Council
Weston Parish Council
Wigtoft Parish Council

AB KETTLEBY PARISH COUNCIL

Clerk to the Council:



Your Ref: EN0210007

3rd December 2025

FOR THE ATTENTION OF MS KATIE NORRIS

Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Ms Norris

Weston Marsh to East Leicestershire Proposed overhead line and 2 new substations Environmental Impact Assessment Scoping Report – EN0210007

Thank you for consulting with Ab Kettleby Parish Council on the proposed Weston Marsh to East Leicestershire Overhead Line and Two New 400KV Substations, in relation to the Environmental Impact Assessment Scoping Report, to determine which environmental topics should be included in the Environmental Statement (ES).

As a Parish Council, representing our community, we are astonished and appalled that the Corridor Preliminary Routing and Siting Study (CPRSS) and Strategic Options Report have come to the conclusion that Wartnaby is a suitable location for substation WMEL-B.

Wartnaby is an ancient, unspoilt hamlet with very little new development that has special character and multiple designated and undesignated heritage assets. It is an entirely unsuitable location for a development of this type and scale.

Response to Scoping Report

We have attached our response to the scoping report with this letter (Ab Kettleby Parish Council Response to Weston Marsh to East Leicestershire Proposed overhead line and 2 new substations Environmental Impact Assessment Scoping Report – EN0210007 3rd December 2025). In summary, we request that the scoping in/out procedure in Chapter 20 is reviewed. We also feel that as our Parish is earmarked for the Sub-Station a separate site specific report for the site and its affect on local residents' landscape and flora and fauna should be carried out rather than being incorporated in a general report as is currently the case

We also attach our general comments on the Report itself.

We would also like to raise the following issues:

- As a small Parish Council with limited resources we have been disappointed by the lack of time given to us (just 4 weeks) to digest and respond to the 657 page Scoping Report plus associated Appendices.
- It is not possible to refer to specific assessments that will be scoped in or out as they do not have individual reference numbers within the Scoping Report. This has made drafting our response far more difficult than it should be.
- Maps included in Figure 1.2 within the Environmental Impact Assessment Scoping Report are illegible due to scale and poor definition making it impossible for us and other parties to identify the areas that are included within the EIA with any certainty.
- We feel that other route options have too easily been rejected for spurious reasons; an example of this being a site being rejected due to power lines having to cross the Birmingham to Peterborough rail track being regarded as too difficult, yet the scheme has a need to cross the East Coast mainline which is in the report perceived to be fine
- Not all Statutory bodies appear to have been consulted, Severn Trent Water being one example

We hope that you will give our proposed changes careful and full consideration. Please do come back to us if you require any additional information.

Kind regards

[Redacted Signature]

[Redacted Name]

Clerk to Ab Kettleby Parish Council

GENERAL POINTS AND COMMENTS

Ab Kettleby , Holwell and Wartnaby Parish Council (the "Parish") submits this formal objection and detailed comments on the Environmental Impact Assessment (EIA) Scoping Report dated November 2025 (the "Scoping Report") submitted by National Grid Electricity Transmission plc (the "Applicant") for the Weston Marsh to East Leicestershire Project (the "Project"). As the representative body for The Parish — small, rural villages in the Melton Borough of Leicestershire, located approximately 0.35 km northeast of the proposed WMEL-B substation site (as noted in Paragraphs 1.1.3, 4.7.19, and Figure 3.9)—the Council is profoundly concerned about the Project's potential severe and irreversible adverse effects on our community's heritage, environment, economy, and quality of life.

The Council is aware of the formal objection submitted by local landowner John King during the May 2025 statutory consultation on the Strategic Options Report (SOR), which identified critical procedural flaws such as the geographical mislabeling of the WMEL-B substation as "new Market Harborough" (now partially corrected in this Scoping Report) and demanded comprehensive Parish-specific assessments. The Council fully supports and echoes those concerns in this separate submission on behalf of the parish. While the Scoping Report acknowledges Wartnaby's location (e.g., Paragraphs 4.7.19, 7.5.21, 9.5.17, 16.5.25) and some features like the Conservation Area (Table 9.1, Appendix 9A), Grade II* listed Church of St Michael (NHLE 1075141), and other listed assets (e.g., NHLE 1178267, 1075142), it remains fundamentally inadequate. It underestimates site-specific impacts, proposes to scope out critical matters (e.g., certain noise/vibration effects in Table 20.10, operational EMF in Table 20.16), fails to explore viable alternatives adequately (Chapter 3), and overlooks cumulative effects with projects like Grimsby to Walpole.

This contravenes National Policy Statements (NPS) EN-1 (e.g., Parts 4.1.19, 5.4, 5.9.5-5.9.7 on accurate assessments, biodiversity, heritage) and EN-5 (e.g., Parts 2.2.8, 2.2.10 on heritage settings; 2.9.5 on birdlife; 2.9.23 on undergrounding in sensitive areas; 2.9.14 on alternatives), the National Planning Policy Framework (NPPF) (e.g., Paragraph 203 on non-designated assets), Schedule 9 of the Electricity Act 1989 (minimizing impacts on natural beauty, flora, fauna, heritage), and the Holford/Horlock Rules (avoiding sensitivities like Wartnaby's undulating landscape).

The Council demands that the Secretary of State (SoS) require a robust, Parish-focused Environmental Statement (ES) relating specifically to the Sub- Station proposed that scopes in all possible additional matters, including those we highlight below. We urge halting the Development Consent Order (DCO) process until flaws are rectified, per Part 5 of the Planning Act 2008. We reserve all rights to further representations, including judicial review, if these concerns are not addressed.

Our comments are structured by the Scoping Report's chapters (1–20), drawing on a thorough review of the document, including baseline data (e.g., Figures 1.1-1.2, 9.1), proposed methodologies (Chapter 5), and scoped-in/out elements (Tables 20.1-20.16). We object to insufficient scoping and demand additional inclusions to ensure comprehensive assessment.

1. Introduction

This chapter overviews the Project (Paragraph 1.1.3: ~60 km 400 kV overhead line, WMEL-A/B substations, 66 km reconductoring), need (Paragraph 1.2: offshore wind integration), EIA requirement (Schedule 1), and Scoping Boundary (Figure 1.2). It notes Wartnaby's proximity (Paragraphs 1.4.2, 4.7.19) but omits cumulative burdens from existing pylons and Wartnaby's sensitivities (e.g., Conservation Area, medieval fishponds with scheduling potential under Ancient Monuments Act 1979). The baseline ignores economic impacts on BMV farmland, pheasant/partridge shoots, and rentals (13 homes, 13 offices, holiday lets within 2 km). We object to the vague Scoping Boundary, which risks underestimating indirect effects (e.g., visual/noise intrusion).

2. Regulatory and Planning Policy Context

This chapter references NPS EN-1/EN-5, NPPF, Electricity Act 1989 (Schedule 9), but provides superficial compliance analysis. It ignores EN-5's allowance for undergrounding in non-designated sensitive areas (2.9.23) like the Parish's medieval landscape. No discussion of Holford/Horlock Rules adherence for the Parish (avoiding heritage clusters, undulating terrain). We object to overlooking local policies (Melton Local Plan) on rural character. Scope in: Detailed compliance assessment with Schedule 9 (minimizing flora/fauna/heritage impacts); Holford/Horlock Rules evaluation for The Parish/Property; alternatives per EN-5 (2.9.14); vibration/noise policies for heritage (NPPF 203); EMF precautionary policy summary (Paragraph 4.6.4).

3. Main Alternatives Considered

This chapter summarizes options appraisal (e.g., Figures 3.7-3.9, Graduated Swathes; WMEL-B Siting Zone BZ1.B preferred) but dismisses undergrounding/subsea without justification (Paragraph 3.5.3: no national designations), ignoring EN-5 (2.9.23) precedents (Dorset AONB, Snowdonia). Alternatives bypassing the Parish (e.g., offshore to Sizewell/Bradwell, southwest to Lutterworth) are unexplored, despite demands in

John King's SOR objection. We object to cost-driven dismissal (Paragraph 3.5.4) without full cost-benefit analysis including heritage/ecology.

4. Description of the Project

This describes WMEL-B (575m x 225-300m, 12m gantries; Paragraph 4.7.19) but lacks detail on footprint, access routes, construction phases (2-3 years), operational noise/EMF, or reconductoring (66 km ZA line). Ignores Wartnaby bridleway G67 crossing (Paragraph 13.5.72). We object to vague mitigation (Paragraph 4.6: Holford Rules compliance). .

5. EIA Approach and Methodology

This outlines general methods (e.g., Study Areas in Table 5.5: 3 km landscape/visual) but uncertainties in Scoping Boundary risk underestimation (Paragraph 5.3.4). No Parish -specific data collection. We object to scoping out matters prematurely (Tables 5.4, 20.1-20.16).

6. Landscape

This identifies LCAs (e.g., High Leicestershire Hills near Wartnaby; Paragraph 6.5.17) but underestimates intrusion from pylons/substation on undulating rural landscape (no ZTV modeling). Proposes scoping out certain indirect effects. We object to inadequate baseline (Figure 6.1).

7. Visual

Visual receptors noted (e.g., Parish residents, bridleway users; Paragraph 7.5.21) but overlooks key viewpoints (St Michael's Church, fishponds). Proposes scoping out transitory effects (Table 20.2). We object to limited Study Area (3 km).

8. Ecology and Biodiversity

EMF risks to birds/pollinators scoped in (Table 20.3, Paragraph 8.7.10) but ignores Wartnaby's/Parish schemes (winter bird food, nectar plantings) and species (skylarks, raptors, badgers, hedgehogs, pheasants/partridges). Proposes scoping out some disturbances (e.g., operational on non-breeding birds). We object to 10 km Study Area insufficiency for migratory paths.

9. Cultural Heritage

Acknowledges Parish assets (Conservation Area, 81 Grade II listings; Paragraph 9.5.17, Table 9.1, Appendix 9A) but undervalues group value/settings (e.g., fishponds' evidential value, Leicestershire HER). Proposes scoping out direct impacts on designated assets (Table 20.4). We object to 1 km Study Area for non-designated (Paragraph 9.8.10). Scope in: Full Heritage Impact Assessment (geophysical surveys, scheduling for fishponds);

vibration/noise/dust on settings (EN-1 5.9.5-7.9.7); cumulative with existing pylons; alternatives per EN-5 (2.9.14); Outline Heritage Mitigation Strategy (Paragraph 9.6.3).

10. Water Environment

Notes surface water flood risks at WMEL-B (narrow flow path, field drains; Paragraph 10.5.41) but ignores drainage changes affecting Wartnaby fishponds/brooks. Proposes scoping out pollution risks (Table 20.5). We object to Flood Zone 1 assumption without modeling.

11. Geology and Hydrogeology

Identifies Made Ground/superficial deposits within and adjacent to the Parish (Till Oadby Member; Paragraphs 11.5.31-11.5.32), elevated radon (30%+; Paragraph 11.5.50), but understates BMV soil compaction risks. Proposes scoping out some residual contaminations (Table 20.6). We object to absent geotechnical surveys.

12. Agriculture and Soils

BMV farmland loss scoped in (Paragraph 12.5.7), reflecting the Parish sustainable estates, but overlooks shoot disruptions/soil degradation. We object to provisional ALC mapping (no 3a/3b differentiation). .

13. Traffic and Transport

Notes Parish roads (e.g., Wartnaby Road, Saxelby Road; Paragraph 13.5.69) and bridleway G67 (Paragraph 13.5.72), but minimizes PRow disruptions. Proposes scoping out some access effects (Table 20.8). We object to vague CTMP (Paragraph 13.6.2). .

14. Air Quality

Dust/emissions scoped in (250m Study Area; Table 20.9), but effects on Parish receptors (residents, wildlife) undermodeled. We object to scoping out operational emissions (Table 20.9).

15. Noise and Vibration

Noise from construction/substations scoped in (300m Study Area; Tables 15.3-15.9, 20.10), but scopes out vibration on non-residential (e.g., heritage; Paragraph 15.8.20) and operational overhead lines (assuming no significant effects). Baseline uses Defra mapping (Figure 15.2), noting the Parish's quiet setting. We object to assumptions (e.g., no significant substation vibration with isolation; Paragraph 15.6.2).

16. Socio-economics, Recreation and Tourism

Notes the Parish's playing fields/church greenspace (Table 16.6), bridleways (Paragraph 16.5.25), but underrepresents losses to shoots/rentals/tourism. Proposes scoping out some indirect effects (Table 20.11). We object to 500m Study Area insufficiency.

17. Health and Wellbeing

Scopes in perceived EMF risks/stress (Table 20.12, Paragraph 17.7.8), but undervalues the Parish's vulnerabilities (rural, elderly residents). We object to scoping out permanent neighborhood amenity changes (Table 20.12).

18. Climate Change

Notes GHG emissions (Paragraph 18.5.2) but no quantification or alternatives exploration (e.g., undergrounding for lower lifecycle). We object to scoping out adaptation measures (Table 20.13). .

AB KETTLEBY PARISH COUNCIL
Response to Weston Marsh to East
Leicestershire Proposed overhead line
and 2 new substations Environmental
Impact Assessment Scoping Report –
EN0210007

3rd DECEMBER 2025

7. VISUAL Point 1

Page 7-15

Extract from Table 7.2 Impacts, receptors and the potential for significant effect

Project phase	Source	Impact	Receptor	Potential for significant effect	Proposed to be scoped in/out
Operation	The introduction of a new 400 kV overhead line and/or new substations and associated lighting into the view.	Alteration to the composition of views through introduction of overhead line towers and/or substation structures or through changes to existing elements such as topography or vegetation.	Users travelling on roads and railway lines.	No – road and rail users generally travelling at speed, largely limiting visibility to glimpsed views of temporary activity, with significant effects unlikely.	~~Scoped Out~~

We request this EIA to be Scoped In.

Our Reasons: The proposed WMEL-B substation site will be highly visible from the small lanes to the East (Lane between Wartnaby and Saxelby known locally as Saxelby Road or The Gated Road) and West (Ostler Lane) and also from the Saltway to the North of the site. The lanes to the East and West are single track with wide grass verges and are both used regularly by walkers, runners, cyclists and horse riders not just faster moving vehicular traffic. Views, topography and vegetation are all likely to be significantly impacted by the introduction of the substation and these views will not limited to glimpses as suggested in table 7.2 above. The Saltway to the north of the site is a faster road and traffic will be travelling at speed, but the introduction of the substation and associated lighting will alter the composition of the views to the South from this elevated section of road.

7. VISUAL Point 2

Page 7-16

Extract from Table 7.2 Impacts, receptors and the potential for significant effect

Project phase	Source	Impact	Receptor	Potential for significant effect	Proposed to be scoped in/out
Operation	The introduction of a new 400 kV overhead line and/or new substations and associated lighting into close range views,	Alteration to residential visual amenity through introduction of overhead line towers and/or substation structures	Residents in individual properties outside 150m RVAA Study Area.	No – no potential for alteration to residential visual amenity due to offset distance. Visual effects from residential receptors covered above under settlement areas.	~~Scoped Out~~

We request this EIA to be Scoped In.

Our Reasons: we were unable to find a definition within the report of the 150m RVAA Study Area, so request this is scoped in as we are concerned that there may be homes outside the 150m RVAA Study Area that may have their residential visual amenity severely impacted by the proposed WMEL-B substation and associated lighting. We are particularly concerned about the potential impact on residential amenity at Ashlands on Saxelby Road and from the new residential property at Glebe Farm, Saxelby.

9. CULTURAL HERITAGE Point 1

Page 9-15

Extract from Table 9.2 Impacts, receptors and the potential for significant effect

Project phase	Source	Impact	Receptor	Potential for significant effect	Proposed to be scoped in/out
Operation and maintenance	New infrastructure altering access and viable use	Impacts to the access of heritage assets	Designated heritage assets Non-designated heritage assets Historic landscapes	No – given the scale and size of the footprint of individual towers, significant effects arising from changes to/limitation of access and use of heritage assets are unlikely to occur.	Scoped Out

We request this EIA to be Scoped In.

Our Reasons: The precise location of substation WMEL-B is unknown, but we are concerned that it may impact the public footpath at the southern end of the proposed location and the bridleway to the northern end and these are important access routes to the conservation village of Wartnaby and provide important links between the conservation villages of Wartnaby, Saxelby and Grimston and their Grade II* listed churches. We are also concerned about severance of traditional routes between Wartnaby village (in particular Wartnaby Hall, Grade II Church Farm and Grade II* St Michael and All Angels Church) and the associated monastic fishpond that is located on the Southern boundary of the proposed WMEL-B substation.

9. CULTURAL HERITAGE Point 2

Page 9-16

Extract from Table 9.2 Impacts, receptors and the potential for significant effect

Project phase	Source	Impact	Receptor	Potential for significant effect	Proposed to be scoped in/out
Operation and maintenance	Vehicular traffic and maintenance activities	Physical impacts to heritage assets or impacts to heritage assets as a result of changes to their setting	Designated heritage assets Non-designated heritage assets Historic landscapes	No – maintenance visits required for the Project would not constitute an impact of sufficient magnitude to cause significant effects to either designated or non-designated heritage assets, or historic landscapes.	Scoped Out

We request this EIA to be Scoped In.

Our Reasons: There has been no clear decision on access routes to the proposed WMEL-B substation, any vehicular access to the site through the villages of Wartnaby or Saxelby could cause damage to designated and non-designated heritage assets within these villages and impact the nature of these low traffic Conservation Villages.

10. WATER ENVIRONMENT

Page 10-32

Extract from Table 10.7 Impacts, receptors and the potential for significant effect

Project phase	Source	Impact	Receptor	Potential for significant effect	Proposed to be scoped in/out
Construction	Temporary works impacting groundwater – surface water interactions.	Impact from any dewatering for substation construction	Watercourses, standing water bodies and any surface water abstractions	No – relatively low levels of permeability and low BFI values for most gauged watercourses suggest the risk is low. Construction works would also be temporary. Significant effects are not likely to occur.	Scoped Out

We request this EIA to be Scoped In.

Our Reasons: The proposed site for substation WMEL-B is extremely close to the spring that feeds the trout ponds (on the Eastern boundary of the proposed site) and monastic fishpond at Wartnaby (on the Southern boundary of the proposed site). There are also streams and ditches and land drains that run throughout the proposed WMEL-B site that will be adversely affected.

11. GEOLOGY AND HYDROGEOLOGY Point 1

Page 11-19

Extract from Table 11.2 Impacts, receptors and the potential for significant effect

Project phase	Source	Impact	Receptor	Potential for significant effect	Proposed to be scoped in/out
Construction	Disturbance of unstable ground from historical mining, leading to potential emergency of sink holes	Harm to human health and aquifers from disturbance of historical mining	Adjacent land users, construction workers Groundwater aquifers, Surface water bodies	No – this will be addressed by the engineering/geotechnical study and design, following applicable standards to ensure no likely significant environmental effects.	~~Scoped Out~~

We request this EIA to be Scoped In.

Our Reasons: The Holwell Nature Reserve and surrounding area is affected by old ironstone mining and quarrying works that make the land unstable and prone to collapse. Ironstone was also mined at Wartnaby.

11. GEOLOGY AND HYDROGEOLOGY Point 2

Page 11-20 & 11-21

Extract from Table 11.2 Impacts, receptors and the potential for significant effect

Project phase	Source	Impact	Receptor	Potential for significant effect	Proposed to be scoped in/out
Operation and Maintenance	Groundwater control measures during the operational phase	Physical effects on aquifers, such as depletion of the aquifer and increased solids/turbidity	Aquifers Groundwater abstractions Springs GWDTEs	No – there are not expected to be any permanent dewatering requirements during the operational and maintenance phase of the Project. On this basis, significant effects are not likely to occur.	Scoped-Out

We request this EIA to be Scoped In.

Our Reasons: There is a spring and also ditches, streams and ponds all within or adjoining the proposed site for substation WMEL-B and we are concerned that these may be impacted during the Operation and Maintenance phase.

13. TRAFFIC & TRANSPORT

Page 13-23 & 13-24

Extract from Table 13.2 Impacts, receptors and the potential for significant effect

Project phase	Source	Impact	Receptor	Potential for significant effect	Proposed to be scoped in/out
Operation and Maintenance	Operational/ maintenance vehicles	Increased traffic volumes due to operational staff trips.	Road users, public transport users (Bus), pedestrians and cyclists,	No - during operation (inc. maintenance) of the Project, traffic generated would be associated with routine maintenance and occasional repair, inspection activities, and a small number of operational staff. The impact of operational traffic from OHL projects would be expected to be substantially lower than 10% of existing traffic and movements are not anticipated to have a material effect on the transport network and receptors. This approach has been successfully undertaken by National Grid on similar OHL projects, and is also suitable for this Project. Traffic and transport effects during operation (inc. maintenance) are therefore proposed to be scoped out.	~~Scoped Out~~

We request this EIA to be Scoped In.

Our Reasons: We do not know details of the access to the proposed WMEL-B substation and are concerned that even small increases in traffic volumes will have an impact because current levels of traffic are low particularly on Ostler Lane to the West of the site and through the Conservation Villages of Wartonaby (which has no through road and hence unusually low traffic levels) and Saxelby.

15. NOISE & VIBRATION Point 1

Page 15-10

Extract from Table 15.2 Impacts, receptors and the potential for significant effect

Project phase	Source	Impact	Receptor	Potential for significant effect	Proposed to be scoped in/out
Construction	Construction Traffic	Vibration impact from construction traffic	NSRs within the Study Area	No – vibration from traffic on public highway is caused by irregularities in the road surface. Where the road surface is well maintained, as per TT01 of Appendix 4A Initial Outline Code of Construction Practice , and free from irregularities, such as potholes, significant vibration effects would not be expected, even at relatively short distances.	Scoped Out

We request this EIA to be Scoped In.

Our Reasons: The proposed WMEL-B substation is potentially located extremely close to houses at Saxelby Pastures (~60m) and very close (~250m) to buildings within the Wartnaby Conservation Area, Wartnaby House being the closest. Due to the relatively steep topography of the proposed WMEL-B site we anticipate that there will be extensive and long lasting groundworks during the construction phase with large ground moving equipment, this combined with the proximity of homes and businesses to the West of the site at Saxelby Pastures and East of the site at Wartnaby increase the potential for impact from vibration on NSRs within these closest areas. The proximity of a heritage building and the other heritage assets within Wartnaby village and their construction from crumbling ironstone, often built without foundations raises a concern with regards building fabric itself as well as people within those buildings.

15. NOISE & VIBRATION – Point 2

Page 15-10 & 15-11

Extract from Table 15.2 Impacts, receptors and the potential for significant effect

Project phase	Source	Impact	Receptor	Potential for significant effect	Proposed to be scoped in/out
Operation	Overhead lines	Noise impact from overhead lines	NSRs within the Study Area	No – the proposed overhead line system is a ‘triple Araucaria’ conductor bundle, which is regarded as practically quiet during both typical dry and wet weather conditions and would not lead to significant adverse effects at nearby Noise and/or Vibration Sensitive Receptors. In addition, tower fittings, such as insulators, dampers, spaces, and clamps, shall be designed and procured in accordance with a series of National Grid Technical Specifications and must be type registered (rigorously tested) to ensure the fitting conforms to the specification. These processes reduce the potential for audible noise and tones to occur from all types of fittings, including insulators. Therefore, operational noise from the overhead lines and towers is not likely to be significant at nearby Noise Sensitive Receptors under any weather conditions. If an alternative type of conductor is considered later in developing the design the potential for significant noise effects will be considered appropriately in the ES.	~~Scoped Out~~

We request this EIA to be Scoped In.

Our Reasons: We do not yet know the exact location of the overhead lines but are concerned that they could potentially come very close to homes within our Parish and that noise from overhead lines could damage residential amenity. We are also concerned that any noise from overhead lines could impact the quiet and tranquil setting of the numerous heritage assets within our Parish. This is particularly important close to our Grade II* listed churches where the peace and tranquility is demonstrably enjoyed by many residents and visitors and forms an integral part of their setting.

15. NOISE & VIBRATION – Point 3

Page 15-11

Extract from Table 15.2 Impacts, receptors and the potential for significant effect

Project phase	Source	Impact	Receptor	Potential for significant effect	Proposed to be scoped in/out
Operation	Substation switchgear and auxiliary plant	Noise from substation switchgear and auxiliary plant	NSRs within the Study Area	No – Switchgear noise is generated, in the main, by the operation of circuit breakers, for which the noise emissions are ‘impulsive’ in character (i.e. of short duration.) Modern switchgear operates with a dull ‘thud’. Switchgear would operate infrequently and is therefore proposed to be scoped out. Auxiliary plant may comprise standby diesel generators and air compressors to provide emergency back-up power to cooling plant. When present and operating, these would generate noise. However, they do not run continuously and would be housed in a building or outdoor acoustic enclosure. Noise from such assets is therefore not considered significant, given its emergency function and as such is proposed to be scoped out.	~~Scoped Out~~

We request this EIA to be Scoped In.

Our Reasons: The proposed WMEL-B substation is potentially located extremely close to houses and businesses at Saxelby Pastures (~60m) and very close (~250m) to Wartnaby Village. Background noise levels in the area are currently low and the introduction of switchgear and auxiliary plant noise will be alien and obtrusive. We are concerned that introduction of new noise from substation switchgear and auxiliary plant will harm the unusually quiet and tranquil setting of Grade II* St Michael and All Angels church at Wartnaby. We have many visitors to Wartnaby Church some of whom sign and comment in the visitors book. The peace and tranquility of the church’s location is regularly commented on in the book and is savoured by residents and visitors alike; it forms an integral part of the setting of this important heritage asset.

15. NOISE & VIBRATION – Point 4

Page 15-12

Extract from Table 15.2 Impacts, receptors and the potential for significant effect

Project phase	Source	Impact	Receptor	Potential for significant effect	Proposed to be scoped in/out
Operation	Operational vibration	Vibration impact at Vibration Sensitive Receptors	NSRs within the Study Area	No – Substation plant would include vibration isolation measures within the design (see Section 15.6). With these measures in place, operational vibration due to substation plant is not expected to result in any vibration impact at NSRs. There are no other sources of operational vibration proposed as part of the Project and as such, this matter is proposed to be scoped out.	~~Scoped Out~~

We request this EIA to be Scoped In.

Our Reasons: The proposed WMEL-B substation is potentially located extremely close to houses and businesses at Saxelby Pastures (~60m) and very close (~250m) to Wartnaby Village. There is also a great deal of wildlife within the area where the substation is proposed to be located that may be affected by low level vibration.

16. SOCIO-ECONOMICS, RECREATION & TOURISM Point 1

Page 16-28

Extract from Table 16.2 Impacts, receptors and the potential for significant effect

Project phase	Source	Impact	Receptor	Potential for significant effect	Proposed to be scoped in/out
Operation and Maintenance	Potential disruption during operational activities (amenity & severance)		Affected communities, community facilities, visitor attractions and businesses (indirect)	No – access to these receptors will be reinstated post construction and their ongoing use will be unaffected during operation and maintenance activities. Therefore, significant effects are not likely to occur.	Scoped-Out

We request this EIA to be Scoped In.

Our Reasons: The bridleway on the northern boundary of the proposed WMEL-B substation site forms an important part of a circular route for horses, walkers and cyclists as it links Ostler Lane (to the West of the site) with Saxelby Road/The Gated Road to the East of the site and the bridleway that runs to the East of the site between Wartnaby and Saxelby. It is also an important link between the ancient villages of Holwell, Ab Kettleby, Wartnaby, Saxelby and Grimston and their Grade II* listed churches. It is popular and well used by residents and visitors to the area. People's enjoyment of this route is largely due to its quiet rural location in unspoilt countryside. The introduction of the substation and associated pylons and overhead wires will greatly detract from peoples enjoyment of this route. The footpath to the Southern end of the proposed substation site will be similarly affected. There are several local businesses providing rural holiday accommodation (Woodland View Glamping at Saxelby Pastures on the Western boundary of the substation site and also an AirBnB property within Wartnaby village). These small businesses attract people that come to the countryside to enjoy walking, cycling and riding in the lovely local countryside. Part of their attraction to vistors is being in a quiet rural location and this may be harmed by operational noise from the substation hence reducing their appeal to customers. There is a wedding business at Church Farm in Wartnaby that offers country weddings during the summer months in their ancient barns and courtyard. The quiet rural setting of the venue next to the village church are what attract couples to get married there. The introduction of pylons, overhead lines and the substation with the associated visual and noise impacts may harm this business.

16. SOCIO-ECONOMICS, RECREATION & TOURISM Point 2

Page 16-28 & 16-29

Extract from Table 16.2 Impacts, receptors and the potential for significant effect

Project phase	Source	Impact	Receptor	Potential for significant effect	Proposed to be scoped in/out
Constriction, Operation and Maintenance	Potential temporary or permanent loss of or impact on receptors (land take).		Affected communities, community facilities, visitor attractions and businesses (direct)	No – the Project has been designed to avoid direct impacts on these receptors and therefore, significant effects are not likely to occur. Should this position change between Scoping and PEIR or ES stage, any communities, community facilities, visitor attractions and businesses likely to be directly impacted, would be included in further assessment as appropriate. Indirect effects which may occur during construction such as disruption to access and noise will be managed through the Construction Traffic Management Plan (CTMP) and CEMP.	~~Scoped Out~~

We request this EIA to be Scoped In.

Our Reasons: We are concerned that there will be considerable economic impact on the business activities of Friars Well Estate who own the land on which the substation WMEL-B is proposed to be located.

16. SOCIO-ECONOMICS, RECREATION & TOURISM Point 2

Page 16-30

Extract from Table 16.2 Impacts, receptors and the potential for significant effect

Project phase	Source	Impact	Receptor	Potential for significant effect	Proposed to be scoped in/out
Constriction, Operation and Maintenance	Potential temporary or permanent loss of residential property, access, and impact on amenity.		Residential properties	No – the emerging preferred corridor for the Project and substation siting areas avoids acquisition or over-sail of residential properties. Indirect effects which may occur during construction such as disruption to access and noise will be managed through the CTMP and CEMP. Significant effects are not likely to occur.	~~Scoped Out~~

We request this EIA to be Scoped In.

Our Reasons: The proposed WMEL-B substation site is extremely close to the homes at Saxelby Pastures to the West of the site and homes in Wartnaby village (particularly Wartnaby House). We feel it is highly likely that significant effects will occur at these residential properties and that residential amenity will be harmed.

17. HEALTH & WELLBEING Point 1

Page 17-19

Extract from Table 17.2 Impacts, receptors and the potential for significant effect

Project phase	Source	Impact	Receptor	Potential for significant effect	Proposed to be scoped in/out
Construction	Use of land for construction of the Project	Potential temporary and permanent land take affecting residential properties, community facilities and businesses.	Local residents, users of community facilities and owners/operators of businesses	No - the construction of the Project will be undertaken so as to avoid temporary or permanent land take affecting residential properties, community facilities and businesses. On this basis, significant effects are not likely to occur.	~~Scoped Out~~

We request this EIA to be Scoped In.

Our Reasons: We are concerned that there will be considerable impact on the business activities of Friars Well Estate who own the land on which the substation WMEL-B is proposed to be located.

17. HEALTH & WELLBEING Point 2

Page 17-21

Extract from Table 17.2 Impacts, receptors and the potential for significant effect

Project phase	Source	Impact	Receptor	Potential for significant effect	Proposed to be scoped in/out
Operation and Maintenance	Use of land for construction of the Project	Potential permanent closure or diversions of promoted recreational routes and PRow	Local residents and users of PRow	No - for this Project, there will be no permanent closures or diversions of promoted recreational routes and PRow during operation and maintenance that would lead to a reduction in mental and physical health benefits gained from use of these, at a population level. Significant effects are not likely to occur.	~~Scoped Out~~

We request this EIA to be Scoped In.

Our Reasons: Enjoyment of use of the PRowS on the Northern and Southern boundaries of the site will be severely depleted due to the introduction of the proposed WMEL-B substation site and as a result they will get used less. The impact on the busy bridleway on the Northern boundary of the substation site will be particularly great. This will lead to a reduction in mental and physical health of residents and users of the PRowS.

17. HEALTH & WELLBEING Point 3

Page 17-22

Extract from Table 17.2 Impacts, receptors and the potential for significant effect

Project phase	Source	Impact	Receptor	Potential for significant effect	Proposed to be scoped in/out
Operation and Maintenance	Use of land for the operation of the Project.	Potential for permanent land take affecting residential properties, community facilities and businesses.	Local residents and owners/operators of businesses	No - the operation and maintenance of the Project will avoid land take affecting residential properties, community facilities and businesses. On this basis, significant effects are not likely to occur.	~~Scoped Out~~

We request this EIA to be Scoped In.

Our Reasons: We are concerned that there will be considerable impact on the owner of Friars Well Estate on whom's land the substation WMEL-B is proposed to be located.

17. HEALTH & WELLBEING Point 4

We would like to note that there is no proposed assessment within the scoping report of the impact on local residents' mental and physical health due to the worry and stress caused by the proposals and the pressure put on people who live within small rural communities to try and make their genuine and rational concerns heard in process that is complex, lengthy and is clearly weighted against them.

18. CLIMATE CHANGE

Page 18-13

Extract from Table 18.2 Impacts, receptors and the potential for significant effect

Project phase	PAS 2080 Module	Module Description	Justification	Proposed to be scoped in/out
End of life	C1-4	Deconstruction, Transport, Waste processing for recovery and disposal	End of life (C1-C4) impacts will not be considered due to the long design life of the Project. It is unusual for elements of National Grid's transmission system to be decommissioned and the site reinstated. As such, significant effects are not likely and this matter is proposed to be scoped out of the assessment.	~~Scoped Out~~

We request this EIA to be Scoped In.

Our Reasons: Just because the end of life is along way off doesn't mean it shouldn't be included within the assessment.

Ms. Katie Norris
Senior Environmental Advisor
The Planning Inspectorate

Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
Cambridgeshire. PE29 6XU

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By email:
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Our ref: WMEL/ Scoping/CM

5th December 2025

Dear Ms. Norris,

**WESTON MARSH TO EAST LEICESTERSHIRE - EIA SCOPING NOTIFICATION AND CONSULTATION –
ANGLIAN WATER RESPONSE**

Thank you for the opportunity to comment on the scoping report for the above project, referred to below as WMEL.

The following response is submitted on behalf of Anglian Water in our statutory capacity regarding water resources, the water supply network, water recycling centres (WRCs), water recycling assets and the sewer network, as well as the related role of surface drainage.

The scoping boundary runs through several local authority areas of South Holland; South Kesteven; Melton; Harborough; and both North and West Northamptonshire. For context, Anglian Water is the appointed sewerage and water undertaker for the majority of this route, other than the sections west of Buckminster where this is outside boundary, although we do cover sewerage services at Market Harborough and surrounding settlements to the north. We cover both water and sewerage services to the south of Market Harborough within North Northamptonshire.

Anglian Water supports the UK's Great Grid Upgrade in principle, recognising the imperative to swiftly increase transmission capacity to enable the decarbonisation of the grid in the move to a more sustainable future and to address climate change. The upgrade of the network through the Anglian Water region will support our delivery of net zero by 2030 through our renewable energy projects. Improved capacity across the region will also provide additional resilience for energy supply including to Anglian Water sites in the face of more extreme weather events.

Anglian Water works to support the construction and operation of nationally significant infrastructure projects (NSIPs) that are conducted in accordance with the Water Industry Act 1991. In view of the guidance in the National Policy Statements e.g. Overarching National Policy Statement for Energy (EN-1) (January 2024) and 2024 IAQM guidance¹⁵, Anglian Water requests that the following points are assessed in the Environmental Impact Assessment (EIA) to set out how the project will be supplied with water and its wastewater managed; how water recycling and supply assets serving residents and business in the area will be protected; and how design has been altered

to reduce the need for new infrastructure or the diversion of existing assets. This is relevant for the construction, operation and de-commissioning stages (as applicable).

Anglian Water has also responded to consultations and/ or is engaged with the project teams relating to National Grid's other projects in these areas, namely Eastern Green Link 3 and 4; Eastern Green Link 5; and Grimsby to Walpole.

The Scheme – Anglian Water Infrastructure

We would expect the next stages of the project (including the EIA) to include reference to any existing infrastructure managed and owned by Anglian Water, and any provision of replacement infrastructure or requirements for new infrastructure.

Anglian Water's own programme of projects for AMP8 (2025-30) should be included with the list of cumulative projects to be assessed in the EIA (Chapter 5 'EIA Approach and Methodology' (Section 5.5.23 – 5.5.29). Our previous response to the non-statutory consultation in August 2025 also highlighted aspects which interrelate with Anglian Water's major projects including (1) the Lincolnshire Reservoir with associated infrastructure; and (2) the SPA pipeline project also in Lincolnshire. Further details are set out below.

Our Business Plan [Our Plan 2025 to 2030 - PR24](#) references record investment and obligation during this next AMP period (2025-30) and through an ambitious WINEP programme as agreed with the Environment Agency as the environmental regulator. The statement in the scoping report (Section 10.5.53) regarding "*a lack of recent investment in foul sewage treatment and sewer capacity*" should be revisited and updated to reflect a more accurate situation regarding this matter.

Lincolnshire Reservoir comments

Anglian Water is proposing to develop a new reservoir in Lincolnshire in the East of England, recognising the need to plan long term for our region's future in line with our adopted Water Resources Management Plan 2024 (WRMP24) [Water resources management plan](#). Our new raw water reservoir is at the heart of a whole new water supply project. Together with the associated water infrastructure we need to transfer water to the reservoir, and from the reservoir to homes and businesses, it will secure a reliable water supply for generations to come. The project is being progressed through the Development Consent Order application process. The new reservoir would be located to the south-east of Sleaford, to the southwest of Heckington between Swaton, Screddington and Helpringham.

The Lincolnshire Reservoir DCO application is currently due for submission in winter 2028/2029. The size and scale of the project means a longer period of pre-application development is needed. Anglian Water has been actively developing this proposal since 2022, with the reservoir site and potential sources identified in our WRMP24.

As well as a new reservoir, the Lincolnshire Reservoir project includes associated water infrastructure which is required to abstract and transfer water to the reservoir and then onward into Anglian Water's supply network once it has been treated to drinking water standards. Following an options appraisal process we identified routes for the associated water infrastructure, which we presented at our second non statutory phase of consultation that took place between May- August 2024. A map of the project as presented during our phase two consultation in 2024 may be found here: [Anglian Water Lincs Reservoir](#)

The WMEL project crosses the identified route of our piped drinking water transfer from the reservoir to Wilsthorpe and Chesterton. The Lincolnshire Reservoir project is at an early stage of design development and as our understanding of our project develops it may be that there could be refinement of this route from that identified in our Summer 2024 consultation, however, an interaction between the projects and therefore an overlap between the Order limits of the projects is likely.

Anglian Water is keen to engage with National Grid as it moves forward with its WMEL project in order that the interactions between the two projects can be understood and managed including through appropriate additional Protective Provisions or other legal Agreement as may be relevant such that there would be no impediment to the development and implementation of either project.

SPA project comments

Anglian Water is currently undertaking construction of a strategic pipeline project [Our strategic pipelines](#) which includes an area between Grantham and Peterborough section comprising 39 kilometres of water pipeline and upgrading pumping stations at West Pinchbeck and Sutterton [Grantham to Peterborough pipeline](#). The WM2EL project will need to take account of these works as the pipeline will include crossing in a north-south direction between Rospley, Ingoldsby, Irnham and Grimsthorpe. Engagement on project design and any future interactions between the projects will need to be managed.

General comments

There are existing Anglian Water assets both above and below ground, which serve the surrounding businesses and communities. These include water recycling centres, water treatment works and sewer pumping stations. There are several water mains and sewers within the project area within the highway or its verges which link to these various settlements.

We would want to confirm the locations and nature of our assets serving local communities are identified and protected. To reduce the need for diversions and the associated carbon impacts of those works, ground investigations could enable the Applicant to design out these potential impacts and so also reduce the potential impact on services if construction works cause a pipe burst or damage to supporting infrastructure.

We recommend that the locations of our assets are initially identified from a desktop study of <http://www.digdat.co.uk/> to establish the extent of our assets within the scheme's application boundary. These should be mapped to establish interfaces with assets and the scheme designed to avoid impacts upon those assets.

For land investigation questionnaires relating to Anglian Water's above ground assets and formal easements, you should contact our estates team on: awsestates@savills.com. Although, it is understood that a completed land interest questionnaire has already been undertaken by Savills and this has identified several affected assets.

In addition, we strongly recommend that clash detection and asset assessment be undertaken by ourselves as early as possible and before the design fix. This ensures clarity, reduces risk, and supports the timely and efficient delivery of the project. We would not agree that a review of utilities plans is used to inform plans for proposed works prior to construction. Given the large number of NSIPs and other Anglian Water projects being delivered in AMP8, there is a strong advantage to having upfront discussions with Anglian Water in relation to our asset interfaces with the project.

Our National Infrastructure team is responsible for identifying Anglian Water assets in relation to the Development Consent Order (DCO) process. Early engagement is critical to ensure accurate assets data is captured and to avoid potential delays later in the project's lifecycle. Sharing data at an early stage enables timely clash detection and coordination. To support efficient assessment and integration into our systems, it would be helpful if the revised boundary/mapping is provided in Shapefile format so that we are able to update our records.

Engagement with us on the asset interfaces of the project can include:

- Clash detection and resolution.
- Early design and technical assurance.
- Asset protection and diversion planning.
- Coordination with Anglian Water investment schemes (current and planned).
- Review of red line boundary implications.

You will be assigned a single point of contact (myself) who will coordinate engagement across relevant teams, including the National Infrastructure Team. Discussions with Anglian Water around project scope, timescales, and other key details will ensure that tailored, project-specific advice can be provided to help de-risk the delivery programme as the Project comes forward.

Whilst, costs would be incurred to support project development and internal planning, this can be discussed further with the Applicant. This would provide a high-level desktop assessment of each interface between the project and Anglian Water assets or projects, and will be dependent on project size, complexity and requirement from the project. Typically, this includes input from both Anglian Water Services and our delivery teams.

This process will also help to inform mitigation measures in the Construction Best Practice (Appendix 4A) for underground cable installation and overhead line installation, as well as any other environmental and traffic management plans. Anglian Water will need to be a consultee set out in the Requirements of the DCO for the approval of these detailed management plans.

Where there are interfaces with our assets, we will require specific Protective Provisions for Anglian Water to be included in the draft DCO. As a starting point, Anglian Water would ask that the following stand-off distances are applied (as indicated in our template Protective Provisions - copy attached) for working each side of the medial line of pipes where construction works are undertaken - including where cabling is undergrounded, CSE compounds, and where pylons are constructed.

- (a) 4 metres where the diameter of the pipe is less than 250 millimetres;
- (b) 5 metres where the diameter of the pipe is between 250 and 400 millimetres, and
- (c) a distance to be agreed on a case-by-case basis and before the submission of the Plan under sub-paragraph (1) is submitted where the diameter of the pipe exceeds 400 millimetres.

Under Chapter 19 'Major Accidents and Disasters', Anglian Water would welcome specific reference on how the interfaces with utility assets such as sewers and water supply within the Order Limits will be managed through the construction of haul roads, bellmouths etc. Whilst Protective Provisions should address those interfaces with our assets, we would welcome further discussion with the applicant regarding such matters and their inclusion in the final versions of the DCO documents.

These documents should include steps to remove the risk of damage to our assets from plant and machinery (compaction and vibration during the construction phase) including any haul and access roads and crossings.

Anglian Water would seek to safeguard 24 hours /7-day access to our assets and this is not compromised. We would, therefore, welcome further discussion with the applicant regarding such matters and their inclusion in the finalised documents.

We consider that until the clash assessment has been undertaken by Anglian Water then likelihood and magnitude impacts cannot be assessed and so it is not possible to scope out these impacts from the EIA.

Noise and Vibration

Chapter 15 'Noise and Vibration' - The impact of traffic vibration on underground water/sewer mains is not identified sufficiently and has been Scoped out (Table 20.11). This is mainly a risk where the depth of soil covering our assets has been reduced due to the construction of temporary construction compounds, bellmouths and haul roads used by construction traffic. We would seek appropriate mitigation measures to be addressed in the various construction, traffic and noise/ vibration management plans to avoid any adverse impacts arising from construction traffic vibration on the operation of our assets.

Groundwater abstraction points and source protection zones (1 and 2)

Chapter 11 'Geology and Hydrogeology' - There are Anglian Water groundwater abstraction points and their corresponding source protection zones (both 1 and 2) within the project area along route sections 1 and 2. Please refer to Pinchbeck Jockey and Haconby Fen groundwater sources.

We would therefore have concerns on any construction works or operation of the scheme that would adversely impact on these zones and water quality and would welcome further discussion on these matters.

We would expect that appropriate measures are considered and implemented to ensure these assets are not adversely affected in terms of quality or quantity or structural integrity by the proposed development.

We request further information regarding proposed GI works, foundation design for structures, deep excavations within the construction area for our review and that a meeting take place to discuss.

Subsequently, Anglian Water may need to be a consultee set out in the Requirements of the DCO for the approval of detailed management plans covering these aspects.

Scheme assessment, design, mitigation and connections

Anglian Water seeks clarification on the following matters:

- If water recycling/ sewerage services are required from Anglian Water (all stages).
- If a water supply is required (all stages).
- Whether the management of surface water will require a public sewer connection.

Anglian Water requests that these points are fully assessed and confirmed in the EIA. Further advice is provided below.

Water recycling/ sewerage services

Chapter 10 Water Environment (Section 10.9.1)

As part of the overall drainage strategy for the project, details of how wastewater is intended to be disposed of and how this will be managed, such as a connection to an available public sewer will need to be confirmed all project stages within the EIA. The Scoping Report states it is not known if there would be a need for a permanent foul drainage solution for any of the proposed new substations. If required, options may include connecting to the nearest available public sewer or a self-contained independent non-mains domestic storage and/or treatment system.

The situation should be confirmed for all stages (construction, operation and de-commissioning) within the EIA.

Water Resources and Water Supply

The project is located within the three Water Resource Zones (WRZ) of Lincolnshire Central; Lincolnshire Bourne and Ruthamford North and designated as being within a 'seriously water stressed' region by the Environment Agency.

Anglian Water advises that the WRMP24 should be referred to in the Bibliography/ References EIA as a data source listed. In view of the potential impacts on water resources, the Applicant is advised to also consider the published Water Resources East [Regional Plan](#) which sets out the collective water companies position.

As water will be used in the project, we agree water resources should be assessed in the EIA. Impacts of climate change in terms of water availability for the construction, operation and decommissioning stages are also of relevance.

At this scoping stage Chapter 11. Geology and Hydrogeology refers to the source of construction water supply being unknown at this stage and this could be from mains water, surface water or groundwater (section 11.9.1).

There is a need to ensure that any development proposals do not have an adverse effect on any existing boreholes which are used to supply the public with drinking water. The EIA will need to consider water resources and water efficiency through the preparation of a Water Resources Assessment (WRA). Anglian Water recommends that the WRA is an integral part of the chapter on Water Environment.

For applications under the 2008 Act, the WRA (or its summary) should form part of the EIA sufficient to enable regulators including the Environment Agency to advise the Examining Authority and the Secretary of State that the supply of water to the project is deliverable and sustainable. A WRA would include setting out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses. Anglian Water recommends that the WRA is an integral part of the EIA.

The project should not assume that water will be available for construction and operation. If that water supply is not available from Anglian Water, then alternative supplies through local abstraction may cause environmental harm and so not be consented by the Environment Agency. The construction of alternative water supplies may themselves generate Green House Gases (GHG).

Anglian Water has a statutory duty to supply water for domestic purposes. This means we are legally obliged to supply water to all household properties as well as any domestic requirements (e.g., drinking water, hand-basins, toilets and showers) of non-household properties. In many cases, domestic demand will be the only requirement for non-household properties (e.g., schools, hospitals, offices, shops and hairdressers). Non-domestic demand refers to water use for industrial processes,

(e.g., agri-food production or car washes), and there is no legal requirement for us to supply for this type of water usage where it might put at risk our ability to supply water for domestic purposes.

Although Anglian Water does not have a statutory obligation to supply for non-domestic purposes in these circumstances, we factor this into our WRMP and we do everything we can to support businesses in the region, with the help of the water retail market.

Anglian Water has adopted a '[Non-Domestic Water Requests Policy](#) - December 2024' (copy attached) which states that requests over 20m³/day will be declined. However, for NSIPs that are requesting over 20m³/day of non-domestic water (as defined above) for a scheme, a Water Resources Assessment (WRA) form must be completed. This is so we can better understand water demands, water efficiency measures and more effectively forecast water supply requirements. This will help enable us to support projects that help achieve national ambitions such as achieving net zero carbon and unlocking sustainable growth.

Our new position on non-household supply is due to our joint aim with the Environment Agency of reducing abstraction to protect sensitive environments. Anglian Water now advise that new non-household water supply requests (construction and operational phases) may be declined as these could compromise our regulatory priority of supplying existing and planned domestic growth.

The flows needed to fill water storage tanks for example (if rainwater harvesting on site is not used to meet non-potable demand) will need to be assessed by Anglian Water to advise whether a supply is feasible, when assessed in terms of the potential to jeopardise domestic supply or at a significant financial or environmental cost.

Anglian Water recommends that new water supply connections are not sought during construction and that potable water supply for welfare facilities, for example, are served by tanker to reduce the embedded (capital) carbon from providing new connections. The Applicant should confirm that there will be no temporary concrete batching facilities with consequent water demands and would be offsite and so not require an on-site supply. Water requirements for firefighting measures and construction traffic (dust suppression/ wheel washing areas) should also be explained.

We would advise you to contact planningliaison@anglianwater.co.uk to discuss the need for water and wastewater connections. The team can take you through the Inflow registration process [InFlow | Development Services](#), the need to submit a pre-planning enquiry request and the requirement to complete a WRA form which will also need to be included in the EIA. This should set out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses. A copy of our WRA template is attached.

Flood Risk, Drainage and Surface Drainage

Chapter 10. Water Environment – Surface Water Drainage Strategy (10.8.16 – 10.8.20)

The Flood Risk Assessment (FRA) as part of the EIA for the project will need to assess all applicable sources of flooding to and identify any mitigation measures required for flood resilience, taking climate change into account, and to prevent any off-site impacts.

Anglian Water is responsible for management of the risks of flooding from surface water which are directed to foul water or combined water sewer systems. Our advice on surface water management is available here: [aws-surface-water-guide-sm.pdf](#) Potential embedded design measures should include Sustainable Drainage Systems (SuDS) to be utilised at permanent above ground installations

to manage rainfall run-off and achieve sufficient attenuation to avoid increases in flood risk, and compensation flood storage at temporary site compounds to manage flood risk at these locations.

Anglian Water will not accommodate any surface water run-off into a foul sewer, and only to a combined sewer in exceptional circumstances. Our preference would be for surface water run-off from above ground permanent buildings and impermeable surfacing to be managed by SuDS with any outfall to a watercourse, in accordance with the drainage hierarchy.

The FRA should consider any increased risk of surface water and groundwater flood risks arising from the scheme that could exacerbate sewer flooding risks due to infiltration/ingress to our networks. The likelihood of more extreme weather events leading to higher-than-average rainfall and cumulative impacts of storm events, as recently experienced during Winter 2023/24, mean that infrastructure becomes increasingly vulnerable to flood risk. The project should aim to minimise any flood risks as far as possible by designing in measures to limit increased flood risks to utilities infrastructure.

Flooding from other sources should include reference to Anglian Water infrastructure and further detail provided regarding potential temporary effects on flood risk from third party infrastructure works during construction of the project should be provided in the FRA, given the interfaces between the project and Anglian Water assets. These interfaces will also be managed through the Protective Provisions and agreed construction practices.

Subject to confirmation that all surface water will be managed following the drainage hierarchy, including Sustainable Drainage Systems (SuDS), Anglian Water would want to clarify that the DCO as proposed will have no connection to the public sewer network for construction or for operations. This would then negate the need for the draft DCO Order to provide for any connection and so require consequent Protective Provisions and Requirements to ensure any connections did not compromise the wastewater services of existing customers.

We consider that SuDS and the potential for rainwater harvesting to serve any non-potable water requirements, should be used. Notwithstanding the lead roles of the Lead Local Flood Authority, the Environment Agency and the Internal Drainage Boards, Anglian Water would welcome clarification on how consequent impacts on the local drainage/ sewerage network will be designed as part of the scheme. Anglian Water will be a consultee set out in Requirements for the approval of drainage strategies and surface water management plans.

We would encourage any pre-planning enquiries are made through our InFlow platform to ascertain the most appropriate solution is taken forward.

Engagement and next steps

Anglian Water would welcome continued engagement with the Applicant throughout the remaining stages of the project to address and resolve issues prior to the submission of the DCO including Protective Provisions. The preparation of a Statement of Common Ground should document key issues and the status of whether issues have been resolved or remain under discussion, which helps to reduce the Examining Authority questions for statutory undertakers and removes the possible need for changes to the project during Examination.

We respectfully request an invitation to attend the Technical Working Groups relating to water, drainage, flood risk etc. (Section 1.9.11 - Further engagement and consultation) if this is extended to include statutory consultees.

We welcome further discussion as the project is refined towards submission of the draft DCO to discuss the matters raised in this consultation response.

Anglian Water will seek to engage further with the Applicant through the pre-application phase to discuss, amongst other matters:

- Impact of construction/operation of the project on Anglian Water's water and water recycling assets and sites.
- The design of the project to minimise interfaces with Anglian Water's existing and proposed assets/ critical infrastructure and specifically to avoid the need for diversions which have carbon costs.
- Requirement for potable and raw water supplies (if any) and the inclusion of the WRA in the draft EIA.
- Requirement for water recycling connections (if any).
- Confirmation of the project cumulative impacts with Anglian Water projects, including the Lincolnshire Reservoir project, and the need for further engagement on these matters.
- Confirmation on the appropriate design/ mitigation of proposed works in the vicinity of groundwater abstraction points and corresponding source protection zones (1 and 2).
- Draft Protective Provisions and Requirements.
- The preparation of a draft Statement of Common Ground prior to submission.

Please do not hesitate to contact me on these aspects so they can be progressed during the pre-application to decision stages of the project, or if you require clarification on the above response.

Yours sincerely,

██████████ (signed)

██████████

Chartered Town Planner – MRTPI

Spatial and Strategic Planning Lead – Sustainable Growth

XXXXXX DCO PROTECTIVE PROVISIONS – SCHEDULE XXXXX: FOR THE PROTECTION OF ANGLIAN WATER SERVICES LIMITED

Application

79. For the protection of Anglian Water the following provisions have effect, unless otherwise agreed in writing between the undertaker and Anglian Water.

Interpretation

80. In this Part of this Schedule—

“1991 Act” means the New Roads and Street Works Act 1991;

“alternative apparatus” means alternative apparatus adequate to enable Anglian Water to fulfil its statutory functions in a manner no less efficient than previously;

“Anglian Water” means Anglian Water Services Limited;

“apparatus” means:

(a) works, mains, pipes or other apparatus belonging to or maintained by Anglian Water for the purposes of water supply and sewerage;

(b) any drain or works vested in Anglian Water under the Water Industry Act 1991;

(c) any sewer which is so vested or is the subject of a notice of intention to adopt given under section 102(4) of that Act or an agreement to adopt made under section 104 of that Act,

(d) any drainage system constructed for the purpose of reducing the volume of surface water entering any public sewer belonging to Anglian Water,

and

(e) includes a sludge main, disposal main or sewer outfall and any manholes, ventilating shafts, pumps or other accessories forming part of any such sewer, drain or works, and includes any structure in which apparatus is or is to be lodged or which gives or will give access to apparatus;

and for the purpose of this definition, where words are defined by section 219 of that Act, they shall be taken to have the same meaning

“functions” includes powers and duties;

“in”, in a context referring to apparatus or alternative apparatus in land, includes a reference to apparatus or alternative apparatus under, over or upon land;

“plan” includes all designs, drawings, specifications, method statements, soil reports, programmes, calculations, risk assessments and other documents that are reasonably necessary properly and sufficiently to describe the works to be executed;

~~On-street apparatus~~

~~81. This Part of this Schedule does not apply to apparatus in respect of which the relations between the undertaker and Anglian Water are regulated by the provisions of Part 3 of the 1991 Act. [only for use where the undertaker has powers under part 3 of the New Roads and Street Works Act 1991]~~

Apparatus in stopped up streets

82.—(1) Where any street is stopped up under article 18 (permanent stopping up and restriction of use of streets and private means of access), where Anglian Water has apparatus in the street or accessed by virtue of that street, it has the same powers and rights in respect of that apparatus as it enjoyed immediately before the stopping up and the undertaker must grant to Anglian Water legal easements reasonably satisfactory to Anglian Water in respect of such apparatus and access to it, but nothing in this paragraph affects any right of the undertaker or of Anglian Water to require the removal of that apparatus under paragraph 85 or the power of the undertaker to carry out works under paragraph 87.

(2) Regardless of the temporary stopping up or diversion of any highway under the powers conferred by article 17 (temporary alteration, diversion, prohibition and restriction of the use of streets), Anglian Water is at liberty at all times to take all necessary access across any such stopped up highway and to execute and do all such works and things in, upon or under any such highway as may be reasonably necessary or desirable to enable it to maintain any apparatus which at the time of the stopping up or diversion was in that highway.

Protective works to buildings

83. The undertaker, in the case of the powers conferred by article 22 (protective work to buildings), must exercise those powers so as not to obstruct or render less convenient the access to any apparatus.

Acquisition of land

84. Regardless of any provision in this Order or anything shown on the land plans, the undertaker must not acquire any apparatus otherwise than by agreement.

Removal of apparatus

85.—(1) If, in the exercise of the powers conferred by this Order, the undertaker acquires any interest in any land in which any apparatus is placed or requires that Anglian Water's apparatus is relocated or diverted, that apparatus must not be removed under this Part of this Schedule, and any right of Anglian Water to maintain that apparatus in that land must not be extinguished, until

(a) alternative apparatus has been constructed and is in operation to the reasonable satisfaction of Anglian Water in accordance with sub-paragraphs (2) to (8); and

(b) facilities and rights have been secured for that alternative apparatus in accordance with paragraph 86.

(2) If, for the purpose of executing any works in, on or under any land purchased, held, appropriated or used under this Order, the undertaker requires the removal of any apparatus placed in that land, the undertaker must give to Anglian Water 28 days' written notice of that requirement, together with a plan of the work proposed, and of the proposed position of the alternative apparatus to be provided or constructed and in that case (or if in consequence of the exercise of any of the powers conferred by this Order an undertaker reasonably needs to remove any of its apparatus) the undertaker must, subject to sub-paragraph (3), afford to Anglian Water the necessary facilities and rights for the construction of alternative apparatus in other land of the undertaker and subsequently for the maintenance of that apparatus.

(3) If alternative apparatus or any part of such apparatus is to be constructed elsewhere than in other land of the undertaker, or the undertaker is unable to afford such facilities and rights as are mentioned in sub-paragraph (2) in the land in which the alternative apparatus or part of such

apparatus is to be constructed Anglian Water must, on receipt of a written notice to that effect from the undertaker, as soon as reasonably possible use its best endeavours to obtain the necessary facilities and rights in the land in which the alternative apparatus is to be constructed.

(4) Any alternative apparatus to be constructed in land of the undertaker under this Part of this Schedule must be constructed in such manner and in such line or situation as may be agreed between Anglian Water and the undertaker or in default of agreement settled by arbitration in accordance with article 54 (arbitration).

(5) Anglian Water must, after the alternative apparatus to be provided or constructed has been agreed or settled by arbitration in accordance with article 54, and after the grant to Anglian Water of any such facilities and rights as are referred to in sub-paragraphs (2) or (3), proceed without unnecessary delay to construct and bring into operation the alternative apparatus and subsequently to remove any apparatus required by the undertaker to be removed under the provisions of this Part of this Schedule.

(6) Regardless of anything in sub-paragraph (5), if Anglian Water gives notice in writing to the undertaker that it desires the undertaker to execute any work, or part of any work in connection with the construction or removal of apparatus in any land of the undertaker or to the extent that Anglian Water fails to proceed with that work in accordance with sub-paragraph (5) or the undertaker and Anglian Water otherwise agree, that work, instead of being executed by Anglian Water, must be executed by the undertaker without unnecessary delay under the superintendence, if given, and to the reasonable satisfaction of Anglian Water.

(7) If Anglian Water fails either reasonably to approve, or to provide reasons for its failure to approve along with an indication of what would be required to make acceptable, any proposed details relating to required removal works under sub-paragraph (2) within 28 days of receiving a notice of the required works from the undertaker, then such details are deemed to have been approved. For the avoidance of doubt, any such “deemed consent” does not extend to the actual undertaking of the removal works, which shall remain the sole responsibility of Anglian Water or its contractors.

(8) Whenever alternative apparatus is to be or is being substituted for existing apparatus, the undertaker shall, before taking or requiring any further step in such substitution works, use best endeavours to comply with Anglian Water’s reasonable requests for a reasonable period of time to enable Anglian Water to:

(a) make network contingency arrangements; or

(b) bring such matters as it may consider reasonably necessary to the attention of end users of the utility in question.

Facilities and rights for alternative apparatus

86.—(1) Where, in accordance with the provisions of this Part of this Schedule, the undertaker affords to a utility undertaker facilities and rights for the construction and maintenance in land of the undertaker of alternative apparatus in substitution for apparatus to be removed, those facilities and rights are to be granted upon such terms and conditions as may be agreed between the undertaker and Anglian Water or in default of agreement settled by arbitration in accordance with article 54 (arbitration).

(2) If the facilities and rights to be afforded by the undertaker in respect of any alternative apparatus, and the terms and conditions subject to which those facilities and rights are to be granted, are in the opinion of the arbitrator less favourable on the whole to Anglian Water than the facilities and rights enjoyed by it in respect of the apparatus to be removed and the terms and conditions to which those facilities and rights are subject, the arbitrator must make such provision for the payment of compensation by the undertaker to Anglian Water as appears to the arbitrator to be reasonable having regard to all the circumstances of the particular case.

(3) Such facilities and rights as are set out in this paragraph are deemed to include any statutory permits granted to the undertaker in respect of the apparatus in question, whether under the Environmental Permitting Regulations 2016 or other legislation.

Retained apparatus

87.—(1) Not less than 28 days before starting the execution of any works in, on or under any land purchased, held, appropriated or used under this Order that are near to, or will or may affect, any apparatus (or any means of access to it) the removal of which has not been required by the undertaker under paragraph 85(2), the undertaker must submit to Anglian Water a plan of the works to be executed.

(2) Those works must be executed only in accordance with the plan submitted under sub-paragraph (1) and in accordance with such reasonable requirements as may be made in accordance with sub-paragraph (3) by Anglian Water for the alteration or otherwise for the protection of the apparatus, or for securing access to it, and Anglian Water is entitled to watch and inspect the execution of those works.

(3) Any requirements made by Anglian Water under sub-paragraph (2) must be made within a period of 21 days beginning with the date on which a plan under sub-paragraph (1) is submitted to it.

(4) If Anglian Water in accordance with sub-paragraph (3) and in consequence of the works proposed by the undertaker, reasonably requires the removal of any apparatus and gives written notice to the undertaker of that requirement, paragraphs 1 to 3 and 6 to 8 apply as if the removal of the apparatus had been required by the undertaker under paragraph 85(2).

(5) Nothing in this paragraph precludes the undertaker from submitting at any time or from time to time, but in no case less than 28 days before commencing the execution of any works, a new plan instead of the plan previously submitted, and having done so the provisions of this paragraph apply to and in respect of the new plan.

(6) The undertaker is not required to comply with sub-paragraph (1) in a case of emergency but in that case must give to Anglian Water notice as soon as is reasonably practicable and a plan of those works as soon as reasonably practicable subsequently and must comply with sub-paragraph (3) in so far as is reasonably practicable in the circumstances, using its best endeavours to keep the impact of those emergency works on Anglian Water's apparatus, on the operation of its water and sewerage network and on end-users of the services Anglian Water provides to a minimum.

(7) For the purposes of sub-paragraph (1) and without prejudice to the generality of the principles set out in that sub-paragraph, works are deemed to be in land near Anglian Water's apparatus (where it is a pipe) if those works fall within the following distances measured from the medial line of such apparatus:

(a) 4 metres where the diameter of the pipe is less than 250 millimetres;

(b) 5 metres where the diameter of the pipe is between 250 and 400 millimetres, and

(c) a distance to be agreed on a case by case basis and before the submission of the Plan under subparagraph (1) is submitted where the diameter of the pipe exceeds 400 millimetres.

Expenses and costs

88.—(1) Subject to the following provisions of this paragraph, the undertaker must repay to Anglian Water all expenses reasonably incurred by Anglian Water in, or in connection with, the inspection, removal, alteration or protection of any apparatus or the construction of any new apparatus which may be required in consequence of the execution of any such works as are referred to in this Part of this Schedule.

(2) There must be deducted from any sum payable under subparagraph (1) the value of any apparatus removed under the provisions of this Part of this Schedule that value being calculated after removal.

(3) If in accordance with the provisions of this Part of this Schedule—

(a) apparatus of better type, of greater capacity or of greater dimensions is placed in substitution for existing apparatus of worse type, of smaller capacity or of smaller dimensions; or

(b) apparatus (whether existing apparatus or apparatus substituted for existing apparatus) is placed at a depth greater than the depth at which the existing apparatus was situated, and the placing of apparatus of that type or capacity or of those dimensions or the placing of apparatus at that depth, as the case may be, is not agreed by the undertaker or, in default of agreement, is not determined by arbitration in accordance with article 54 (arbitration) to be necessary, then, if such placing involves cost in the construction of works under this Part of this Schedule exceeding that which would have been involved if the apparatus placed had been of the existing type, capacity or dimensions, or at the existing depth, as the case may be, the amount which apart from this subparagraph would be payable to Anglian Water by virtue of subparagraph (1) must be reduced by the amount of that excess.

(4) For the purposes of sub-paragraph (3)—

(a) an extension of apparatus to a length greater than the length of existing apparatus is not to be treated as a placing of apparatus of greater dimensions than those of the existing apparatus; and

(b) where the provision of a joint in a pipe or cable is agreed, or is determined to be necessary, the consequential provision of a jointing chamber or of a manhole is to be treated as if it also had been agreed or had been so determined.

89.—(1) Subject to sub-paragraphs (2) and (3), if by reason or in consequence of the construction of any such works referred to in paragraphs 83 or 85(2), or by reason of any subsidence resulting from such development or works, any damage is caused to any apparatus or alternative apparatus (other than apparatus the repair of which is not reasonably necessary in view of its intended removal for the purposes of those works) or property of Anglian Water, or there is any interruption in any service provided, or in the supply of any goods, by Anglian Water, the undertaker must—

(a) bear and pay the cost reasonably incurred by Anglian Water in making good such damage or restoring the supply; and

(b) make reasonable compensation to Anglian Water for any other expenses, loss, damages, penalty or costs incurred by the undertaker,

by reason or in consequence of any such damage or interruption.

(2) The fact that any act or thing may have been done by Anglian Water on behalf of the undertaker or in accordance with a plan approved by Anglian Water or in accordance with any requirement of Anglian Water or under its supervision does not, subject to sub-paragraph (3), excuse the undertaker from liability under the provisions of sub-paragraph (1) unless Anglian Water fails to carry out and execute the works properly with due care and attention and in a skilful and professional like manner or in a manner that does not accord with the approved plan.

(3) Nothing in sub-paragraph (1) imposes any liability on the undertaker with respect to any damage or interruption to the extent that it is attributable to the unlawful or unreasonable act, neglect or default of Anglian Water, its officers, servants, contractors or agents.

(4) Anglian Water must give the undertaker reasonable notice of any such claim or demand and no settlement or compromise is to be made, without the consent of the undertaker (such consent not to be unreasonably withheld or delayed) who, if withholding such consent, has the sole conduct of any settlement or compromise or of any proceedings necessary to resist the claim or demand.

Cooperation

90. Where in consequence of the proposed construction of any of the authorised development, the undertaker or Anglian Water requires the removal of apparatus under paragraph 85(2) or Anglian Water makes requirements for the protection or alteration of apparatus under paragraph 9, the undertaker must use all reasonable endeavours to co-ordinate the execution of the works in the interests of safety and the efficient and economic execution of the authorised development and taking into account the need to ensure the safe and efficient operation of Anglian Water's undertaking, using existing processes where requested by Anglian Water, provided it is appropriate to do so, and Anglian Water must use all reasonable endeavours to co-operate with the undertaker for that purpose.

91. Where the undertaker identifies any apparatus which may belong to or be maintainable by Anglian Water but which does not appear on any statutory map kept for the purpose by Anglian Water, it shall inform Anglian Water of the existence and location of the apparatus as soon as reasonably practicable.

92. Nothing in this Part of this Schedule affects the provisions of any enactment or agreement regulating the relations between the undertaker and Anglian Water in respect of any apparatus laid or erected in land belonging to the undertaker on the date on which this Order is made.

93. The undertaker and Anglian Water may by written agreement substitute any period of time for those periods set out in this Part of this Schedule.

[Note: the main provisions of the DCO may provide the undertaker with a right to connect to a public sewer. If so, although the connection may only be made with the consent of Anglian Water, such consent may not be unreasonably withheld. Disputes as to reasonableness are dealt with as disputes under section 106 of the Water Industry Act 1991 which preclude the issue of capacity being raised. Therefore, Anglian Water should be named as a consultee in respect of the drainage strategy that the development must follow, which will usually be found in the Schedule concerning "Requirements". This will put Anglian Water in the same position as it would be in connection with a non-DCO development seeking connection under section 106 above.]



Anglian Water's Non-Domestic Water Requests Policy

December 2024

1.0 Executive Summary

The East of England is the driest part of the country and climate change is making summers hotter and drier. To help protect the environment, the Environment Agency (EA) is reviewing abstraction licences and reducing the amount of water that businesses including Anglian Water can abstract from the environment. As a result, **the gap between the demand for water and our supply (aka headroom) has shrunk.**

This situation is reducing our ability to be flexible with new requests to supply non-domestic connections which were not planned for in the Water Resources Management Plan (WRMP).

To respond to both this challenge, and a growing population, Anglian Water is building a new strategic pipeline to move water around our region. We have also developed plans to build two new reservoirs to increase water supply. These solutions will take time to deliver, and so it is more crucial than ever that all homes and businesses are water efficient, to reduce the overall demand for water, to meet government targets and to ensure there is enough water to go around.

2.0 Background

2.1 Anglian Water

Anglian Water serves 20% of the total landmass of England and Wales and covers the largest geographical area of any water company. The Anglian Water region is the driest area in the country, receiving around two thirds of the average national rainfall. The population in the East of England has increased by 8.3% between 2011-2021, according to census data, which is the highest rate of growth in the UK. At Anglian Water we are committed to catering for this population growth and subsequently enabling growth in the economy. Agriculture and agri-food processing are vital industries in the East of England and require high volumes of water.

2.2 The EA's Abstraction Reduction Strategy

Water abstraction from the environment provides essential water for public water supply, agriculture and industry. However, unsustainable levels of abstraction impact the ecology and resilience of our rivers, wetlands and aquifers. Having the right flow in our rivers and protecting groundwater levels is essential to supporting healthy ecology, enhancing natural resilience to drought, and ensuring that rivers continue to support recreation and wellbeing. The Environment Agency (EA)'s abstraction reduction strategy is therefore essential for the health of our environment, but it does present some challenges for both ourselves and other businesses, especially as changes have been made to the EA's approach since we developed our last long term water resources management plan.

We also had three public water supply groundwater licences which required closure by June 2024. A further two public water supply groundwater sources have been identified at potential risk of closure by 2030. This, as well as the other pressures on our water supply, adds even greater pressure to the gap between demand for water and our ability to supply.

2.3 Water Resource Management Plans (WRMPs)

Every 5 years water companies create a WRMP which sets out how water companies intend to achieve a secure supply of water for customers and a protected and enhanced environment. This includes consideration of which abstraction licences are being reduced or removed and predictions for requirements from new homes and businesses. There have always been requests for new or increased water connections after the WRMP has been drafted and we build in an element of flexibility into the plan for unforeseen changes. However, due to the changes in the EA's abstraction reduction strategy the number of requests received by Anglian Water for non-domestic connections has increased in the last year as business are also having their licences reduced or revoked, or simply cannot access any other source of water. At the same time we have seen new requests related to the 'onshoring' of production following Brexit and other supply chain issues, as well as new demands relating to net zero ambitions.

3.0 How can Anglian Water Help?

Anglian Water has a statutory duty to supply water for domestic purposes. This means we are legally obliged to supply water to all household properties as well as any domestic requirements (e.g., drinking water, hand-basins, toilets and showers) of non-household properties. In many cases, domestic demand will be the only requirement for non-household properties (e.g., schools, hospitals, offices, shops and hairdressers). Non-domestic demand refers to water use for industrial processes, (e.g., agri-food production or car washes), and there is no legal requirement for us to supply for this type of water usage where it might put at risk our ability to supply water for domestic purposes.

Although Anglian Water do not have a statutory obligation to supply water for non-domestic purposes, we factor this into our WRMP and we do everything we can to support businesses in the region, with the help of the water retail market. However, as described above, the situation is now changing, due to water supply being squeezed by abstraction reduction, climate change and a fast-growing population. Therefore, where new and unplanned non-domestic requests are received, which exceed 20,000 litres per day (0.020 Ml/d) (this may be less, dependent on the availability of water in that area) AW will need to decline the request for more water, in order to protect existing supplies and the environment.

4.0 What can your water retailer do to help?

The water retailer is the main point of contact for any water related issues or advice a business might need. We would always advise businesses contact them first and foremost to discuss water supply. Water retailers can provide information, including on how to become more water efficient and make the water you already have go further.

5.0 What can businesses do to help?

The cheapest and most sustainable solution to the region's water resource problem is to collectively reduce our water consumption. Water efficiency measures can be an extremely effective way to free up water resources for business expansion or new connections. Anglian Water have an ambitious smart metering roll out programme across the region for all homes

and businesses which help customers change their behaviour and become more water efficient. For our largest business customers, we offer smart meter data down to 15-minute intervals.

Water efficiency audits should be undertaken before new water supplies are requested. This could include installing water efficient devices (e.g., aerated taps and shower heads, low flush or air flush toilets) and efficient white goods (e.g., dishwashers and washing machines). Water demand can also be reduced through fitting smart meters, which measure water usage and provide regular readings, helping to identify leaks and tracking water consumption. Meters can also help support and encourage behavioural change.

In many cases, water reuse can also be a good option for reducing demand for water. Water reuse generally refers to the capture, treatment (if required) and use of alternative water supplies for non-potable purposes. It includes rainwater and surface water harvesting, greywater recycling and wastewater recycling. Water reuse technologies have the potential to save significant amounts of water, especially in situations where non potable water could be used in production.

6.0 What we need from government?

There are several things Anglian Water is calling on the government to do to help address this challenge and protect water resources:

1. Include every sector in a national campaign to reach the 20% water demand reduction target published in the Environment Act 2021.
2. Introduce a mandatory water efficiency labelling system for water using products, similar to the scheme already in place for energy using products.
3. Tighten building regulations and enforcement so that new homes are built to ambitious water efficient standards, as set out in the government's EIP (Environment Improvement Plan) 2023.
4. Make a commitment to link water efficiency with existing and new energy efficiency policies and retrofitting programmes.
5. Recognise the need to create new headroom to enable non-domestic growth.
6. Support us in delivering large scale strategic water resources options (for example, Anglian Water's two new reservoirs and new pipelines).

Water Resource Assessment

The need for a Water Resource Assessment

Anglian Water is committed to supporting sustainable economic growth across the East of England. However, due to the impacts of climate change and to help protect the environment, the amount of water that businesses, including Anglian Water, can abstract is reducing. This situation is reducing our ability to be flexible with new requests to supply non-domestic connections which were not planned for in the Water Resources Management Plan 2025-2050 (WRMP24).

Whilst Anglian Water are taking steps to respond to this challenge with the construction of two new reservoirs and strategic pipeline transfers, these will take time to deliver. As such it is more crucial than ever that we work together with businesses, to ensure we are aware of their water demands for growth, and that demand management and water efficiency solutions are implemented to maximise what water is available.

Whilst Anglian Water has a statutory duty to supply water for domestic purposes (e.g., drinking water, hand-basins, toilets and showers) for non-household properties (e.g., schools, hospitals, offices, shops and hairdressers), there is no legal duty to provide water for non-domestic usage (e.g., agri-food production or car washes) where it might put at risk our ability to supply water for domestic purposes. When a site is designated as an NSIP or SDO, we will do our utmost to provide the water required for your project. However, this is subject to a director level review within Anglian Water and can take some time to approve. In some instances, even NSIPS and SDOs may ultimately be refused their requested non-domestic water request.

Anglian Water has adopted a [‘Non-Domestic Water Requests Policy’](#) which states that requests over 20m³/day will be declined. However, for Nationally Significant Infrastructure Projects that are requesting over 20m³/day of non-domestic water (as defined above) for a scheme, a Water Resource Assessment must be completed. This is so we can better understand water demands, water efficiency measures and more effectively forecast water supply requirements. This will help enable us to support projects that help achieve national ambitions such as achieving net zero carbon and unlocking sustainable growth.

Water Resource Assessment (WRA)

We advise that the WRA is used to inform the Preliminary Environmental Impact Report at the Statutory Consultation stage of the Development Consent Order (DCO) process and the Environmental Statement at submission. This will include engagement with environmental regulators. The WRA will also need to be submitted to Anglian Water’s pre-planning team also, so that the request for non-domestic water can be considered further. To guide this, we have set out below the information we expect to be included.

1. Contact and project details

Applicant name	
Applicant address	
Applicant contact name	

Applicant contact email	
Applicant contact phone number	

Agent name (if applicable)	
Agent address	
Agent contact name	
Agent contact email	
Agent contact phone number	

Retailer name (if applicable)	
Retailer address	
Retailer contact name	
Retailer contact email	
Retailer contact phone number	
Water SPID	
Sewerage SPID	
Trade Effluent DPID	

Site address/location details	
Site contact name	
Site contact role	
Site contact email	
Site contact phone number	

Site type / usage	
Hours of production	
Days of production	
Peak production period	
When will your connection be required	
Number of full-time employees on site	
Number of jobs supported by new/additional supply and discharge request	
Financial investment linked to request	
Project planning route and status - please provide details and timeframe	

2. Existing site supply and discharge (if applicable)

Non-domestic water demand	
Mains (potable) water consumption	
Annual water consumption (m ³ /year)	
Average daily water demand (m ³ /day)	
Peak daily water demand (m ³ /day)	
Peak hourly water demand (m ³ /hour)	
Borehole water consumption	
Annual water consumption (m ³ /year)	
Average daily water demand (m ³ /day)	
Peak daily water demand (m ³ /day)	
Borehole licence reference (please attach)	
Other water consumption (specify source)	
Annual water consumption (m ³ /year)	
Average daily water demand (m ³ /day)	
Peak daily water demand (m ³ /day)	
Anglian Water/site water connection location (Grid ref)	
Meter Serial Number and size	
Site water supply internal and external pipe diameters	
Site water supply pipe length to first point of use	
On-site water storage volume	
Effective water storage volume (m ³)	
Height above ground level of inlet to storage	
Storage inlet control device (ball-valve, motorised valve, etc)	
Percentage of process supplied by on-site water storage	

Trade effluent	
Total trade effluent volume (m ³ /year)	
Average daily trade effluent discharge (m ³ /day)	
Peak daily trade effluent discharge (m ³ /day)	
Trade effluent consent reference (if applicable)	
Trade effluent connection location (Grid ref)	
Trade effluent treatment plant description	
Trade effluent composition	

3. New (or additional needs) site supply and discharge requirements

This should include any temporary non-domestic water uses for construction.

Water demand

Quantity of water requested for domestic purposes (m ³ /day)	
Quantity of water requested for non-domestic (process) purposes (m ³ /day)	
Any water required for the purposes of firefighting	
Quality of water required i.e. potable or non-potable	
Average daily demand (m ³ /day)	
Peak daily demand (i.e. the highest volume we might have to supply in a day in m ³ /day)	
Diurnal and annual profile (m ³)	
Timescales to require the water, including any 'ramping up' to the full volumes e.g. construction needs and timescales	
Trade effluent	
Total trade effluent volume (including existing if appropriate) (m ³ /year)	
Average trade effluent volume (including existing if appropriate) (m ³ /day)	
Peak trade effluent volume (including existing if appropriate) (m ³ /day)	
Project planning route and status – please provide details and timeframe	

4. Water efficiency measures

As set out above, and in Anglian Water's Non-Domestic Water Requests Policy, there is a need to make best use of what water is available across the region, through implementation of water efficiency measures. We expect evidence of high levels of water efficiencies that you are considering implementing as part of your development and processes.

Potential ideas and solutions that we would want evidence on include:

- Maximisation of existing onsite resources (e.g. own borehole)
- Consideration of non-water based or close-loop cooling systems
- Capture and reuse of water from water-based cooling systems e.g. blowdown
- Sharing of resources with neighbouring facilities, considering all water-based resources such as steam, water/effluent reuse, rainwater harvesting
- Specification of highly rated white goods
- Sub-metering on site
- Evidence of water audit systems
- Infrastructure or systems that could manage the timing of water take e.g. onsite storage and control system, production flexibility
- Onsite measures to improve the water environment e.g. wetland

Please set out below what steps you have undertaken or will implement to ensure your processes (including during construction phases), and development are as water efficient as possible:

From: [REDACTED]@blaby.gov.uk>

Sent: 04 December 2025 15:45

To: Weston Marsh to East Leicestershire

<westonmarshtoeastleics@planninginspectorate.gov.uk>

Subject: EN0210007 - EIA Scoping consultation Weston Marsh to East Leicestershire - Blaby District Council

You don't often get email from [REDACTED]@blaby.gov.uk. [Learn why this is important](#)

Dear Sir/Madam

EN0210007 - EIA Scoping consultation Weston Marsh to East Leicestershire

Thank you for contacting Blaby District Council in respect of the above EIA Scoping Opinion request.

The proposed development will have a negligible impact on Blaby District Council's area during the operational phase, however, due to the presence of parts of the strategic network within the Authority's area, there is potential for effects during the construction phase due to transport impacts. It is noted from the scoping report that Leicestershire County Council, as the relevant Highway Authority, has been consulted as a stakeholder in the process. We would therefore request that full consideration is given to any comments that they may make in respect of the scope of the Environmental Statement, in so far as this relates to Blaby District Council's area.

Regards

[REDACTED]

Senior Planning Officer – Blaby District Council

Telephone [REDACTED]

Email: planning@blaby.gov.uk

VISIT OUR WEBSITE: www.blaby.gov.uk

Please save paper and only print out what is necessary

To find out about how we use your personal information, please review our [privacy notice](#).

Raise No Objection



Planning Inspectorate
Arolygiaeth Gynllunio
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Planning and Growth Services
Charnwood Borough Council
Development Management,
Southfield Road, Loughborough,
Leicestershire,
LE11 2TN

Details of Application

APPLICATION NO: P/25/2362/2

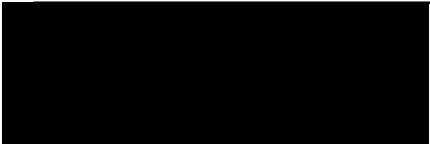
PROPOSAL: Consultation from Planning Inspectorate - Scoping opinion for approximately 60km of 400 kV overhead power line, reconductoring 66km of existing power line and associated infrastructure

LOCATION: Weston March to East Leicestershire,

APPLICANT National Grid Electricity Transmission plc

I refer to your request for observations about the above proposal and would advise you that the Borough Council has no comment in relation to the scoping opinion.

If you have any questions or require further information, please Email development.control@charnwood.gov.uk


Head of Planning and Growth

25 November 2025

From: [REDACTED] <ckparishclerk2019@gmail.com>
Sent: 14 November 2025 09:20
To: Weston Marsh to East Leicestershire
<westonmarsh toeastleics@planninginspectorate.gov.uk>
Subject: Croxton Kerrial and Branston Parish Council feedback

Hi

I hope that you are well.

I can confirm that the above Parish Council do not have any feedback regarding this matter.

Kind Regards,

[REDACTED]

Parish Clerk

Croxton Kerrial and Branston Parish Council

Katie Norris – Senior EIA Advisor
Planning Inspectorate

Our ref: XA/2025/100483/01-L01
Your ref: EN0210008

Sent via email:
westonmarsh toeastleics@planninginspectorate.gov.uk

Date: 05 December 2025

Dear Ms Norris,

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) –
Regulations 10 and 11**

**Environment Agency Scoping Consultation Response – Weston Marsh to East
Leicestershire electricity lines Nationally Significant Infrastructure Project**

Thank you for your consultation on the Scoping Report, submitted under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, in support of the Application by National Grid Electricity Transmission plc (NGET) (the applicant) for an Order granting Development Consent for the Weston Marsh to East Leicestershire (the proposed development). This consultation was received on 7 November 2025.

We have reviewed the submitted Scoping Report by National Grid (dated November 2025) and can provide the following advice in relation to matters within our remit.

In summary, we general agree with the proposed scope for the EIA, however there are certain matters which disagree should be scoped out, or lack clarity on whether they will be scoped in:

- We do not agree that construction phase water demands should be scoped out.
- It is not clear if firewater run-off, if there is a substation fire, is to be scoped in.
- It is not clear if construction impacts on fish are to be scoped in.
- If underground cables are to be used, operational impacts on fish from electro-magnetic fields, and heat impacts on groundwater, are to be scoped in.

Further detail is provided within:

- Appendix A – Comments on the scope of the EIA

- Appendix B – General advice on the proposals and EIA content
- Appendix C – Additional advice for the Applicant

Please note this response does not represent our final view in relation to any future Development Consent Order (DCO) application, or any environmental permit/licence applications made to us. Our final views will be based on all relevant information including applications and guidance available at the time of submission.

We trust this advice is useful.

Yours sincerely,



Planning Specialist, National Infrastructure Team

Email: Nlteam@environment-agency.gov.uk

Appendix A – Comments on the scope of the EIA

Document Reference(s): EIA Scoping Report (Main Report) – Chapter 8 Ecology and Biodiversity, Table 8.5 (page 8-32)	
Issue (ref. EA01)	It is not clear if impacts on fish are scoped in for construction activities, as they are not explicitly mentioned in Table 8.5.
Impact	If impacts on fish are not suitably assessed in the EIA, then the proposal may lead to harm to this receptor and loss or damage to habitat. This may also lead to a deterioration in Water Framework Directive (WFD) status.
Solution	Fish must be scoped into the EIA. Baseline data should be obtained through a desk study (including EA fish population data) and field surveys. Impact-pathways should be identified and assessed in the EIA, which should include (but not limited to): • impacts on fish from electro-magnetic fields (EMFs) where high voltage cables pass below watercourses. • impacts from noise and vibration associated with construction • impacts from pollution and increased sedimentation • impacts from open cut crossing of watercourses and potential loss or damage to habitat • impacts from light pollution on watercourses and aquatic ecology
Additional narrative/explanation	
Freely available Environment Agency fish survey data should form part of the desk-based study for the baseline. This can be found here Ecology & Fish Data Explorer . Furthermore, where there are likely to be impacts on watercourses, then fish surveys should be completed to understand the fish baseline data.	

Document Reference(s): EIA Scoping Report (Main Report) – Chapter 4 Description of the Project, Cable Installation: paragraphs 4.8.40 to 4.8.44 (page 4-29)	
Issue (ref. EA02)	While it is assumed that the new transmission line would be overhead line, it is noted that underground cables could be considered. High voltage cables generate electro-magnetic fields (EMFs) which can impact fish. This will need to be assessed if this option is taken forward.
Impact	If impacts on fish are not suitably assessed in the EIA, then the proposal may lead to harm to this receptor and loss or damage to habitat. This may also lead to a deterioration in Water Framework Directive (WFD) status.
Solution	Fish must be scoped into the EIA. Baseline data should be obtained through a desk study (including EA fish population data) and field surveys. Impact-pathways should be identified and assessed in the EIA, which should include (but not limited to): • impacts on fish from EMFs where high voltage cables pass below watercourses. • impacts from noise and vibration associated with construction • impacts from pollution and increased sedimentation

	• impacts from open cut crossing of watercourses and potential loss or damage to habitat • impacts from light pollution on watercourses and aquatic ecology
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Additional narrative/explanation

Freely available Environment Agency fish survey data should form part of the desk-based study for the baseline. This can be found here [Ecology & Fish Data Explorer](#). Furthermore, where there are likely to be impacts on watercourses, then fish surveys should be completed to understand the fish baseline data.

Document Reference(s):

EIA Scoping Report (Main Report) – Chapter 4 Description of the Project, Cable Installation: paragraphs 4.8.40 to 4.8.44 (page 4-29)

Issue (ref. EA03)	While it is assumed that the new transmission line would be overhead line, it is noted that underground cables could be considered. High voltage cables can generate heat, which will need to be assessed if this option is taken forward.
Impact	Heat dissipated from underground cables can raise subsurface temperatures which could affect groundwater quality. Under the Environmental Permitting (England and Wales) (Amendment) Regulations 2023 , heat is classified as a groundwater (and surface water) pollutant. Discharges that may lead to an input of heat into groundwater are groundwater activities.
Solution	If underground cables are required, heat emissions from these cables should be scoped into the EIA for the operational phase to ensure potential thermal impacts on sensitive groundwaters receptors are assessed. If scoping out this matter, adequate justification must be provided in the reporting.

Additional narrative/explanation

The Environment Agency is currently developing guidance about heat as a pollutant to groundwater and to date has published a regulatory position statement, exemptions and permitting regime for open and closed loop ground source heating and cooling systems (GSHCs). Further information is available on GOV.UK: [Closed loop ground source heating and cooling systems: exemption conditions - GOV.UK](#)

Desk based assessments at the planning stage should consider heat from electricity cables. The GSHC exemption criteria in the document above could help assess the risk.

Document Reference(s):

EIA Scoping Report (Main Report) – Chapter 10 Water Environment, paragraphs 10.7.19 and 10.7.20 (page 10-30)

Issue (ref. EA04)	While operational impacts from the substations have been scoped in for further assessment, the Scoping Report does not explicitly state that potential firewater run-off will be considered.
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Impact	Firefighting waters can contain high concentrations of pollutants that if unmanaged could lead to pollution of controlled waters.
Solution	Firewater drainage should be scoped into future assessments along with mitigation measures to prevent the release of pollutants into the water environment.
Additional narrative/explanation Information should be provided explaining how the drainage systems, particularly at substations, should be set up in such a way that allows for them to be closed off from the water environment in the case of fire. Sufficient storage for firewater should also be provided, as should a plan detailing what will happen to that water and what maintenance will be carried out to the drainage system before normal drainage resumes. It should be considered whether substation fires should be scoped into the Major Accidents and Hazards chapter for assessment.	

Document Reference(s): EIA Scoping Report (Main Report) – Chapter 10 Water Environment	
Issue (ref. EA05)	Water supply to meet various construction demands has not been considered. As such, insufficient justification has been provided for scoping this matter out of the EIA.
Impact	The location of this development is in an area of serious water stress, as identified in our Water Stressed Areas – 2021 Classification report (https://www.gov.uk/government/publications/water-stressed-areas-2021-classification). Inadequately assessing water demands could overlook potential impacts on local water resources, supply infrastructure, and cumulative effects on water availability. There is a risk that impacts around water supply are not fully understood at an early enough stage.
Solution	A basic water supply strategy should be included as part of the EIA to evaluate all consumptive uses of water anticipated during construction. These may include, but are not limited to, dust suppression, wheel wash, potable supply to welfare stations, concrete batching and bentonite drilling fluids where horizontal directional drilling is employed.
Additional narrative/explanation In accordance with paragraph 5.16.7 of the Overarching National Policy Statement for Energy (EN-1) the Environmental Statement should assess the potential impacts of the proposed development on water resources, including availability and sustainable use, and demonstrate how demand for water will be managed without adversely affecting existing supplies or the environment. As identified in paragraph 10.5.25 (page 10-16), Chapter 10 Water Environment, of the Scoping Report, the project passes through many catchments,	

predominantly the Welland, Witham, Nene and Soar, for which licensing policy varies. If water availability is underestimated, this can pose problems pre-commencement which can be anticipated during planning.

Anglian Water Services has adopted a “Non-Domestic Water Requests Policy” for which it asks of applicants who require non-domestic water supply to complete a Water Resource Assessment (WRA) to understand water demands, water efficiency measures and to effectively forecast water supply requirements.

The WRA will fulfil the strategy described above and should also include a basic options appraisal of alternative sources of supply, should Anglian water supply not be available at some or all of the locations required by the project. This may include third party tankering (the impact of which adds HGVs to local roads); rainwater harvesting (issues of low volumes and limited opportunity); and/or abstraction from surface water or groundwater which is subject to the licensing strategies identified in 10.5.25.

Please also refer to our advice on dewatering in Appendix C.

It should be taken into account that consumptive abstraction from groundwater is not available, more details can be found in the [Abstraction Licensing Strategy](#) for the catchment.

Appendix B – General advice on the proposals and EIA content

Document Reference(s): EIA Scoping Report (Main Report) – Chapter 10 Water Environment	
Issue (ref. EA06)	Temporary works and possible deterioration in Water Framework Directive (WFD) status.
Impact	Temporary structures may have a detrimental effect if the structure is either in place for greater than six months, or effects of structure last longer than 6 months, potentially leading to a deterioration in WFD status.
Solution	Under WFD, structures that effect the water environment and are either in place for longer than 6 months, or where effects last longer than 6 months, cannot be considered as temporary. Appropriate assessment should be undertaken with reference to WFD guidance and take into account actions to be delivered under the River Basin Management Plan (RBMP) for the area.
Additional narrative/explanation Timescales should be considered where temporary structures are involved. For engineering and access, temporary usually means non-permanent, something that can be removed easily and is not left in place. Under this definition, it is possible for a “temporary structure” to be left in place for several years, depending on the length of time of construction and requirements for access. However, for WFD, temporary structures can only be considered temporary if in place for less than 6 months and where effects do not last longer than 6 months. If the intention is for the “temporary structure” to be in use for greater than 6 months, it should be assessed as if it were a permanent piece of infrastructure. Removal of said infrastructure, after need for access is over, should also be assessed.	

Document Reference(s): EIA Scoping Report (Main Report) – Chapter 8 Ecology and Biodiversity; Chapter 10 Water Environment; EIA Scoping Report (Appendices) – Appendix 10A. Water Framework Directive Screening and Scoping Assessment, Table 10A.2 Screening of Activities	
Issue (ref. EA07)	Use of temporary access culverts
Impact	Culverts, even those in use temporarily (definition of temporary - see above), have the potential to lead to a deterioration in WFD status of a waterbody, through interference in passage of water, fish, mammals and sediments, if poorly designed or managed.
Solution	Our preference is for clear span bridges. However, based on paragraph 8.7.4 of the Scoping Report (see below), it is assumed that culverts will only be used as a last resort. It is recommended that, if box culverts are to be used in these circumstances, the invert be positioned at least 300mm below the hard bed of the watercourse.
Additional narrative/explanation	

For main rivers, the Environment Agency has a general policy against the use of culverts (please refer to Appendix C for further information).

We note the following is stated in paragraph 8.7.4 (Chapter 8 of the Main Report), which is welcomed: “At sensitive crossing locations (e.g. watercourses), existing access routes would be used as far as possible and the width of any required working area reduced as far as practicable. If access upgrades are required, temporary bridges will be used in preference to culverts. Where culverts are unavoidable, these will either be arch culverts, leaving the natural bed undisturbed, or they would be installed with the invert set below the natural bed level for a semi-natural bed to establish within the culvert”. It is also reassuring that “Once the works are complete the temporary structures will be removed and the bed and banks of the watercourse reinstated, potentially with some enhancement over baseline” (Table 10A.2 of Appendix 10A).

For ordinary (non-main river) watercourses advice should be sought from the Lead Local Flood Authority (LLFA) / Internal Drainage Board (IDB), where applicable, regarding use of culverts and appropriate crossing methodologies, taking into account the waterbody WFD status, sensitivity and actions outlined in the local RBMP.

Document Reference(s):

EIA Scoping Report (Main Report) – Chapter 20 Summary, Table 20.5; EIA Scoping Report (Appendices) – Appendix 4A. Initial Outline Code of Construction Practice

Issue (ref. EA08)	Insufficient information regarding buffer zones around watercourses.
Impact	Insufficient buffer zones between development and watercourses can disrupt the integrity of the natural river corridor and impact riparian ecology. The free movement of riparian mammals can be restricted, there is a potential for habitat fragmentation, and potential impacts on water quality and aquatic ecology from any increases in sediment and pollutant run-off into rivers.
Solution	The development should maintain a riparian buffer around all watercourses. As a minimum we would expect this to be 10 metres from the top of the bank. It should be clearly demonstrated that there is a sufficient buffer between the development, any fences and any watercourse or ditch. This will allow for the natural river corridor to be maintained and free movement of riparian mammals up and down the system. During the construction phase, temporary construction compounds within 15 metres of watercourses could be screened with fencing on sides adjacent to the watercourse, and working lighting could be positioned to avoid light-spill onto sections of the watercourse. Both measures would lower the risk of disturbance to riparian mammals occupying the watercourse.

Additional narrative/explanation

We are pleased to see the intention to apply a buffer around watercourses, for example, as referenced in Table 20.5 of the Scoping Report (Main Report): “watercourses should be buffered from the location of new towers”. We also welcome that “runoff across the site will be controlled through a variety of methods including buffer zones around watercourses”, as stated in Table 4A.3 Control and management measures of the Initial Outline Code of Construction Practice. However, no details of buffer zone distances are given.

Document Reference(s):

EIA Scoping Report (Appendices) – Appendix 2A: Key Legislation

Issue (ref. EA09)	The following legislation is missing from Table 2A.1 Key Legislation in Appendix 2A: Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024
Impact	Risk of not considering new environmental definitions in legislation in respect of Biodiversity Net Gain (BNG), such as ‘irreplaceable habitat’, along with related offences to said habitats
Solution	The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024, should be included for completeness.

Document Reference(s):

EIA Scoping Report (Appendices) – Appendix 4A. Initial Outline Code of Construction Practice

Issue (ref. EA10)	No details of the buffer distances for protected wetland areas within the project boundary are given.
Impact	Insufficient buffer zones can lead to the potential for habitat and wildlife disturbance, potential for spread of invasive species and potential run-off of silt and pollutants.
Solution	We advise that a buffer of at least 10 metres is provided around any wetland habitats on site.

Additional narrative/explanation

We welcome the intention to retain and ensure appropriate protective areas are established around sensitive features, such as protected habitats like reed beds and lowland fens, as referred to in paragraph 8.6.13 as being on land within the Scoping Boundary.

Document Reference(s):

EIA Scoping Report (Main Report), Chapter 8 Ecology and Biodiversity, paragraph 8.6.47 (page 8-27); EIA Scoping Report (Appendices) – Appendix 4A. Initial Outline Code of Construction Practice, Table 4A.2

Issue (ref. EA11)	The preparation of an Invasive Species Management Plan (ISMP) to support the Outline Code of Construction Practice is not listed under the Environmental Control Plans in Table 4A.2 of the Initial Outline Code of Construction Practice
Impact	The absence of an ISMP could result in the uncontrolled spread of invasive and non-native species (INNS) listed in Schedule 9 of the

	Wildlife and Countryside Act 1981 (as amended). There is also an increased risk of legal non-compliance. The accidental spread of invasive species is an offence under the Wildlife and Countryside Act 1981.
Solution	An ISMP should be added to the list of documents under Table 4A.2 being prepared to support the Outline Code of Construction Practice.
Additional narrative/explanation INNS are expected to be present throughout the Scoping Boundary, as referenced in paragraph 8.6.47 of the Scoping Report. An ISMP should include a pathway specific risk assessment identifying any pathways for spread during construction, operation and decommissioning. Strict and robust biosecurity measures should also be incorporated within the ISMP.	

Document Reference(s): EIA Scoping Report (Appendices) – Appendix 4A. Initial Outline Code of Construction Practice, Table 4A.3 Control and management measures	
Issue (ref. EA12)	Control measures GG28, W08 and W09 state that alternative supplies will be provided if a private water supply is impacted by pollution, but remediation is not mentioned.
Impact	There is a lack of clarity about whether the pollution would be remediated, both at source and at the receptor. This presents a risk of contamination to controlled waters if appropriate remediation is not implemented.
Solution	Add information to the control measures to confirm that pollution will be remediated.

Document Reference(s): EIA Scoping Report (Main Report) – Chapter 10 Water Environment & Chapter 11 Geology and Hydrogeology, and associated Figures.	
Issue (ref. EA13)	None of the figures associated with these chapters, that discuss groundwater, show the aquifer status of the study area.
Impact	The lack of aquifer mapping reduces clarity on groundwater sensitivity and could indicate that the aquifers are not being considered as receptors. This may lead to inadequate mitigation to protect groundwater.
Solution	Include aquifer classification figures in the subsequent reporting, i.e. Preliminary Environmental Information Report (PEIR) and Environmental Statement submitted with the DCO application.

Document Reference(s): EIA Scoping Report (Main Report) – Chapter 4 Description of the Project, paragraphs 4.8.43 to 4.8.44 (page 4-29)	
Issue (ref. EA14)	The use of horizontal directional drilling (HDD) may be required in some parts of the scheme. The Initial Outline Code of Construction

	Practice (CoCP) does not include control measures relating to this activity.
Impact	This activity could lead to the pollution of controlled waters, via bentonite breakout, use of drilling muds, for example, if not managed correctly.
Solution	Include control measures in the Outline CoCP to provide reassurance that risks to controlled waters from this activity will be managed. This may include a bentonite breakout plan, water features survey and hydrogeological risk assessment

Document Reference(s):

EIA Scoping Report (Main Report) – Chapter 10 Water Environment, paragraph 10.6.3 (page 10-25)

Issue (ref. EA15)	The proposed Weston Marsh substation is located within Flood Zone 3. It has been noted that the substation will need to be designed to remain operational in a flood, but the requirement to avoid increasing flood risk elsewhere has not been addressed.
Impact	In the absence of appropriate mitigation measures, development located within the fluvial design flood extent may result in increased flooding elsewhere, through displacement of floodwater and/or altered flood flows.
Solution	Where above ground construction is located in an area of flood risk, any increases in the footprint of the buildings will require floodplain compensation; the FRA needs to consider floodplain compensation on a level for level, volume for volume basis. Floodplain compensation should consider the 1 in 100 year plus climate change flood event as the 'design flood'. The FRA also needs to ensure that there is no increase in flood risk to third parties as a result of the development, for example by altering flood flow routes.

Document Reference(s):

EIA Scoping Report (Main Report) – Chapter 10 Water Environment, paragraph 10.7.17 Substations (page 10-29)

Issue (ref. EA16)	Unmapped fluvial flood risk associated with ordinary watercourses which bisect or are located near to the proposed substation siting zones.
Impact	In the absence of this information, there is a risk of underestimating flood risk associated with the proposal. This may result in mitigation measures being inadequately designed and potential increases to flood risk elsewhere through displacement and/or altered flood flows.
Solution	The fluvial flood risk from ordinary watercourses which run near to WMEL-B in particular, and any potential fluvial flood risk flow paths in the vicinity of WMEL-A, should be considered. Suitable mitigation should be included, where appropriate, to demonstrate that the substations will be resilient to flooding without increasing risk elsewhere.

Additional narrative/explanation

The Scoping Report notes that the proposed WMEL-A and WMEL-B substations are located within Flood Zone 1, so are not at risk of fluvial flooding and should not

require any associated compensatory storage. However, there are some small ordinary watercourses which are located close to or bisect the WMEL-B site.

The Flood Map for Planning only considers flood risk from watercourses which have a catchment area of greater than 3km². Whilst the fluvial risk associated with smaller ordinary watercourses is likely to be small it is important to note that there is an evidence gap in fluvial flood risk for small catchments. As such, the applicant should fully investigate the potential for fluvial flood risk to the proposed substation siting area WMEL-A and WMEL-B before confirming that compensatory storage is not required.

The Risk of Flooding from Surface Water (RoFSW) dataset is a useful starting point for establishing the flood risk associated with smaller ordinary watercourses. Please note however, where a reliance is being placed on existing flood risk products such as the RoFSW mapping, then clear justification should be provided as to why this is a suitable proxy for representing fluvial flood risk. In some cases, more detailed hydraulic modelling may be required to understand the impacts of flood risk to the development and because of the development

Appendix C – Additional advice for the Applicant

1.0 Navigation

The project intersects with three main river waterways for which the Environment Agency are the Navigation Authority:

- River Nene
- River Welland
- River Glen

As such, these waterways may be affected by the project and there are regulatory implications for the navigations. The following matters will need to be addressed as the project progresses:

1.1 Temporary crossings

The Scoping Report states that temporary access crossings will be required for construction where the route intersect the rivers. The Environment Agency need to understand what the impact is on navigation, more details on where they will be positioned and the crossing locations, and if a navigation closure be required.

All three rivers listed above are statutory navigations, and the Environment Agency has a legal responsibility to keep them open for our licensed vessel owners. It would be useful to understand the duration of these works, certainly in relation to our navigations and what time of the year these works are to be proposed. If it is during the spring and summer period, these are our busiest periods for boat owners and other waterway users. If a closure is needed further discussion will be required to understand the impact and the mitigation measures needed.

1.2 Overhead electricity lines

Another consideration are the high voltage lines and how this may impact sailing boats especially on the River Welland. This is where Welland Yacht Club are based and we would need to understand the height and the position of the cables over the rivers and are there any dangers or issues concerning electric arc possibilities occurring. This will also need to be considered across all the rivers for VHF aerials and any concerns with electric arcing.

1.3 White Mills Marina

Specifically for the River Nene, the project is situated close to a sizable marina called White Mills. Consultation with them and their customers would also be recommended.

2.0 Environment Agency land interests

The Environment Agency has numerous land interests which fall within the site boundary. It is unclear at this stage whether this land will be affected by the proposals and to what extent.

We have land interests associated with:

- weirs/locks, where we will need to maintain rights of access for navigation purposes (see Navigation comments).
- flood storage areas / defences.
- access route(s) and a leased borehole site
- land assets. There will be rights of access required for tenants and for our maintenance purposes.

From a landowner perspective, we will need further detail before we are able to advise on ownership matters and any compensation as a result of the proposed development.

Our Estates Team have been notified of the proposals. Please contact them to discuss our land interest matters via our National Customer Contact Centre (enquiries@environment-agency.gov.uk).

3.0 Flood risk

3.1 Flood model data

Table 10.2 Water environment – sources of information (page 10-4), in Chapter 10 of the Scoping Report, notes that data requests will be made to the Environment Agency for modelled flood data. We hold hydraulic models for the River Welland, East and West Glen, South Forty Foot drain, River Witham, and River Wreake. Checks should be undertaken to ensure that any existing modelling which is used to inform the flood risk assessment (FRA) represents current and future baseline conditions and uses the most appropriate and up to date boundary conditions. Some of the modelling held by the Environment Agency for the Main Rivers crossed by the order limits for the development uses climate change allowances which have now been superseded. Please check any modelling data you use in line with guidance on using modelling for FRAs available online at: [Using modelling for flood risk assessments - GOV.UK](#).

3.2 Climate change allowances

Paragraph 10.5.52 (page 10-24) notes that climate change is likely to lead to significant changes in hydrological conditions within the study area over the lifetime of the project. The FRA will consider the impact of climate change on flood risk in line with current Environment Agency guidance. This is welcomed. The reference provided for the associated climate change guidance is the Flood Map for Planning service which is incorrect. The appropriate guidance to follow can be found here: [Flood risk assessments: climate change allowances - GOV.UK](#).

For clarity as the development would be classed as “Essential Infrastructure” and nationally significant the Higher Central Allowance should be used. A credible maximum scenario should also be used to assess the resilience of the development to more significant climate change effects.

3.3 Watercourse crossings

Watercourse crossings are identified (Appendix 4A. Table 4A.3 Control and management measures, ref. W04), including the potential need for culverts and bridges. Any works to watercourses have the potential to impact flood risk and should be designed appropriately to ensure there are no negative impacts.

Culverting existing watercourses and drainage ditches should be avoided in favour of clear span bridges. Where culverting for access is unavoidable, applicants should demonstrate that no reasonable alternatives exist and where necessary it will only be in place temporarily for the construction period.

Please also note:

- the requirement for a flood risk activity permit (FRAP) in relation to main river watercourse crossings (please see advice on FRAPs and disapplication)
- the Environment Agency is the Navigation Authority on certain main rivers within the Scoping Boundary (please refer to our ‘Navigation’ comments)
- the Environment Agency has land interests alongside certain main rivers, which should also be taken into account (please refer to our ‘Environment Agency land interests’ comments).
- our advice on culverts/deculverting

4.0 Flood risk activity permits (FRAPs) and associated disapplication of legislation

4.1 Requirement for environmental permit (flood risk activities)

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:

- erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge
- altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
- building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river
- dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- diverting or impounding the flow of water or changing the level of water in a main river

- quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
- any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
- any activity within 16 metres of a sea defence structure
- activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549.

It is noted that the developer may be a protected undertaker, for which exemptions could apply. Please refer to the following guidance:

<https://www.gov.uk/government/publications/environmental-permitting-regulations-exempt-flood-risk-activities/exempt-flood-risk-activities-environmental-permits>.

The applicant should not assume that a permit will automatically be forthcoming once a Development Consent Order (DCO) has been approved, and we advise the to consult us at the earliest opportunity.

4.2 Disapplication of flood risk activity permits

If any of the works are likely to require a FRAP, we recommend that you inform the Environment Agency at the earliest opportunity as to whether you are seeking to disapply the Environmental Permitting Regulations (England and Wales) 2016 for flood risk activities as part of the DCO. Please note that the DCO will need to include protective provisions for our benefit if the disapplication of FRAPs is sought.

5.0 Culverting and removal of culverts

Culverting works against the natural processes of watercourses. It can exacerbate the risk of flooding and increase maintenance cost and complexity. It can also destroy wildlife habitats, hinder fish passage, reduce amenity value, interrupt the continuity of the linear corridor of a watercourse and can affect channel stability. It can also significantly reduce resilience to the effects of drought, floods and pollution. We will therefore take this into account in our decision making.

Detrimental effects of culverting watercourses can include:

- Increased likelihood of flooding due to their limited capacity and propensity for blockage, both of which can result in obstructions to flow, and loss of floodwater storage
- Exacerbating the nature of flooding by increasing flow velocities and speed of onset

- Loss of and adverse effects on morphology, fisheries and wildlife habitat including substrate
- If present, adverse effects on protected species
- The creation of barriers to fish passage through increased water velocities, behavioural deterrent, shallow depths, darkness, oxygen depletion and eroded culvert entrances
- Increased geomorphological risk including changes to channel stability, river bank and bed erosion and increased deposition around the culverted sections
- Greater difficulties in providing for drainage connections
- Increased liabilities and costs due to the need to maintain, repair and replace culverts or to manage upstream and downstream risks
- Increased health and safety hazards, notably for workers clearing blockages and for children in urban areas
- Locally reduced groundwater recharge
- Increased difficulty in detecting the origins of pollution and in monitoring water quality
- Reduced resilience for communities and wildlife to the effects of extreme weather events, climate change and acute pollution

In addition to avoiding the detrimental effects of new culverting listed above, the restoration of river corridors by removing or opening sections of existing culverting and restoring natural river beds and banks can have wider benefits, including:

- Providing habitat for wildlife and improving its connectivity
- Providing additional flood storage capacity and slowing flows
- Ameliorating the urban heat island effect
- Providing areas for recreational use
- Improving amenity, health and educational opportunities
- Increasing property prices and their desirability
- Reducing maintenance costs and improving safety

6.0 Groundwater protection

6.1 Avoidance of sensitive groundwater receptors

In relation to paragraph 4.1.3 of the Scoping Report, the alignment of the project and associated infrastructure should avoid sensitive groundwater receptors, particularly Source Protection Zone 1 (SPZ1).

6.2 Updated piling guidance

Control measure GH02 in Table 4A.2 Environmental Control Plans (page 4A-17 of Appendix 4A, Initial Outline Code of Construction Practice) references out of date Environment Agency guidance: “Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination’ (EA, 2001)”

The following guidance should now be used and appropriate referenced in any subsequent documents: Piling and Penetrative Ground Improvement Methods on

Land Affected by Contamination: Guidance on Pollution Prevention (CL:AIRE, March 2025).

6.3 Decommissioning of buried cables

In relation to section 4.10 Decommissioning, paragraphs 4.10.1 to 4.10.3 of the Scoping Report, it is noted that decommissioning effects have been scoped out of the EIA based on the expected longevity of the scheme. It is stated that best practice at the time of any decommissioning will be followed.

We request that the applicant expands on this to confirm that if decommissioning is required and any infrastructure will be left in situ, they will commit to completing an environmental risk assessment in relation to leaving buried cables in situ.

7.0 Dewatering

If dewatering is required, it will require an abstraction licence if it does not meet the criteria for exemption in [The Water Abstraction and Impounding \(Exemptions\) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works](#). It may also require a discharge permit if it falls outside of the [regulatory position statement for de-watering discharges](#).

If the dewatering activity can be demonstrated to be discharged to the same source of supply without intervening use (i.e. non-consumptive), this will increase the likelihood of a licence being granted.

8.0 Water discharges – environmental permits

Paragraph 10.2.6 of the Scoping Report mentions Regulatory Position Statement (RPS) 261 for temporary dewatering from excavations to surface water, which maybe relevant. However, there is no acknowledgment that some of discharges during the construction phase could require a water discharge permit under The Environmental Permitting (England and Wales) Regulations 2010. Both construction site run-off and sewage discharges from welfare compounds could require a permit if there is a discharge to the environment.

Please refer to the following guidance: [Water discharge and groundwater activity environmental permits - GOV.UK](#)

9.0 Regulated waste sites

The proposed project is located close to several permitted sites in the in the Melton Mowbray area. These are shown in the following table:

Permit Number	Operator	Site Name	Site Postcode	Site Type
GP3548QT	Samworth Brothers Ltd	Melton Foods	LE13 1GA	Food Manufacturing
JP3434RS	SAINT-GOBAIN CONSTRUCTION PRODUCTS UK LIMITED	Welby Tip	LE14 3RE	Landfill
HP3834JP	ES FACILITIES MANAGEMENT LIMITED	Unit E Asfordby Business Park	LE14 3JL	Waste Treatment
SP3790CP	Melton Borough Council	Lake Terrace Depot	LE13 0BZ	Waste Treatment
CP3939GM	Mars Petcare UK Ltd	Mars Petcare	LE13 1BB	Food Manufacturing

It is not anticipated that the development would have an impact on these sites unless the proposed works traverse the site or are directly adjacent, however, from the maps provided the proposed development is in the vicinity of a landfill site named Welby Tip that is potentially producing landfill gas.

Landfill gas consists of methane and carbon dioxide. It is produced as the waste in the landfill site degrades. Methane can present a risk of fire and explosion. Carbon dioxide can present a risk of asphyxiation or suffocation. The trace constituents of landfill gas can be toxic and can give rise to long- and short-term health risks as well as odour nuisance.

The risks associated with landfill gas will depend on the controls the operator has in place to prevent its uncontrolled release from the landfill site. Older landfill sites may have poorer controls in place and the level of risk may be higher or uncertain due to a lack of historical records of waste inputs or control measures.

Landfill operators are required by their environmental permits to use appropriate measures to manage odour emissions. Developments near to landfills may be impacted by odour even when the landfill operator is compliant with their permit. The potential impact on residents or occupiers should be taken into account for developments near to landfills.

10.0 Waste management

If excavated materials are to be used on the development site, the applicant will need to comply with the exclusion from the Waste Framework Directive (WFD) article 2(1) (c) for the use of, 'uncontaminated soil and other naturally occurring

material excavated in the course of construction activities, etc...') for waste controls to not apply to their use. Meeting these criteria will mean environmental permitting requirements do not apply.

Where the developer cannot meet the criteria, they will need an appropriate environmental permit from us or to register an exemption.

A deposit of waste to land must either be a disposal or a recovery activity. The legal test for recovery is set out in Environmental Permitting (England and Wales) Regulations 2016, and is defined in schedule 9 and/ or schedule 1A (Article 3(15) of WFD) as any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy.

We have produced guidance on the recovery test which can be viewed at [Waste recovery plans and deposit for recovery permits - GOV.UK](#).

You can find more information on the WFD here: [Environmental permitting guidance: The waste framework directive - GOV.UK](#)

More information on the definition of waste can be found here: [Legal definition of waste guidance - GOV.UK](#)

More information on the use of waste in exempt activities can be found here: [Waste exemption guides - GOV.UK](#)

The Environment Agency does not regulate non-waste operations. The person producing the material will need to decide if it is waste or a by-product. If it is waste they can consider if it meets End of Waste criteria. You can [check if your material is waste](#) or [get an opinion from the definition of waste service](#) on if a material is a by-product or meets 'end of waste' status. There is a cost for this service.

The developer must apply the waste hierarchy as a priority order of prevention, re-use and recycling before considering other recovery or disposal options. Government guidance on the waste hierarchy in England can be found here: [Waste hierarchy guidance](#).

Site Waste Management Plans (SWMP) are no longer a legal requirement in England, however, in terms of meeting the objectives of the waste hierarchy and your duty of care, they are a useful tool and considered to be best practice. Other best practice approaches are found in the [Waste Prevention Programme for England](#).

10.1 Waste on-site

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the environmental permitting

status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

We recommend that developers should refer to the [waste management](#) page on GOV.UK.

We will consider any queries in relation to the use of [Definition of Waste: Development Industry Code of Practice \(DoWCoP\)](#) (which is to be updated) through our environmental permitting enhanced pre-application advice service, considering site conditions, the materials that are proposed to be used, and the potential for harm to the environment and to human health. We can also provide advice as to whether an environmental permit is required.

10.2 Waste to be taken off-site

Contaminated soil that is (or must be) disposed of, is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with [British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan'](#) and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of hazardous waste material produced or taken off site is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to the [hazardous waste](#) pages on GOV.UK for more information.

11.0 Control of emissions from non-road going mobile machinery (NRMM)

Where development involves the use of any NRMM with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in [Regulation \(EU\) 2016/1628 \(as amended\)](#). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority (LPA).

This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NO_x), and or particulate matter that has an aerodynamic diameter of 10

or 2.5 microns (PM10 and PM2.5). Use of low emission technology will improve or maintain air quality and support LPAs and developers in improving and maintaining local air quality standards and support their net zero objectives.

We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority. The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document.

The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit.

NRMM includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application to which this then can be applied.

END

From: clerk@grimstonparishcouncil.gov.uk <clerk@grimstonparishcouncil.gov.uk>

Sent: 27 November 2025 17:35

To: Weston Marsh to East Leicestershire

<westonmarshtoeastleics@planninginspectorate.gov.uk>

Subject: Grimston, Saxelbye & Shoby Parish Council REF EN0210007

You don't often get email from clerk@grimstonparishcouncil.gov.uk. [Learn why this is important](#)

Your letter reference: EN0210007

Weston Marsh to East Leicestershire (WMEL) - EIA Scoping and Consultation and Regulation 11 Notification

Good afternoon,

Thank you for the opportunity to comment upon the WMEL Environmental Impact Assessment scoping.

The Parish Council wish all sections already within scope to remain in scope. They also wish the 32 sections on the attached excel spreadsheet to be included in scope.

As there is no specific reference for each topic, the page reference within the report EN021007 part 3 (dated November 2025) has been used.

This relates to pages 597 to 656 on the full document and section 20.

If you require any further information please contact me, and I would appreciate confirmation of receipt of this email.

Regards

Clerk to Grimston, Saxelbye & Shoby Parish Council

Page ref	Assessment Section	Project phase	Receptor	further detail	Request	Notes
20_2	Landscape	Construction	All RPGs	In relation to overhead lines, second point on page	To be scoped in	
20_8	Landscape	Construction, Operation & Maintenance	all identified landscape designations....	in relation to all project components, second point on page	To be scoped in	
20_9	Visual	Construction	Users travelling on roads and railway lines	third point on page	To be scoped in	
20_9	Visual	Construction	All potential visual receptors...	fourth point on page	To be scoped in	
20_10	Visual	Operation	Users travelling on roads and railway lines	fourth point on page	To be scoped in	
20_10	Visual	Operation	All potential visual receptors...	fifth point on page and overpage to 20_11	To be scoped in	
20_11	Visual	Operation	Residents in individual properties outside...	second point on page	To be scoped in	
20_11	Visual	Operation	All potential visual receptors...	third point on page	To be scoped in	
20_21	Historic Environment	Construction	Designated heritage assets	second point on page	To be scoped in	
20_25	Water Environment	Construction	Watercourses	fourth point on page	To be scoped in	local flooding does occur
20_26	Water Environment	Construction	Watercourses, standing water bodies....	first point on page	To be scoped in	
20_30	Geology & hydrogeology	Construction	Adjacent land users....	fourth point on page	To be scoped in	mining area
20_35	Agriculture and soils	Operation and maintenance	Agricultural land / BMV land..	first point on page and overpage to 20_36	To be scoped in	
20_36	Agriculture and soils	Operation and maintenance	Soil	first point on page and overpage to 20_37	To be scoped in	
20_37	Agriculture and soils	Operation and maintenance	Agricultural land holdings	first point on page	To be scoped in	
20_39	Traffic & transport	Construction	General public	first point on page	To be scoped in	narrow roads
20_40	Traffic & transport	Operation	Road users, public transport users...	second point on page	To be scoped in	size of vehicles versus size of roads
20_44	Noise & Vibration	Construction traffic vibration	Vibration Sensitive receptors...	fifth point on page	To be scoped in	potholes & poor road conditions
20_45	Noise & Vibration	Operational noise from overhead lines	Noise Sensitive receptors..	first point on page	To be scoped in	
20_45	Noise & Vibration	Operational noise from substation switchgear & auxiliary plant	Noise Sensitive receptors..	third point on page and overpage to 20_46	To be scoped in	States "these would generate noise"
20_46	Noise & Vibration	Operational vibration	Vibration Sensitive receptors...	first point on page	To be scoped in	
20_46	Noise & Vibration	Maintenance noise and vibration	Noise and / or Vibration	second point on page	To be scoped in	
20_47	Socio, Recreation and tourism	Operation and maintenance	Users of recreational routes.....	fourth point on page and overpage to 20_48	To be scoped in	
20_50	Socio, Recreation and tourism	Construction, Operation & Maintenance	Affected communities....	third point on page and overpage to 20_51	To be scoped in	
20_52	Socio, Recreation and tourism	Construction, Operation & Maintenance	Residential properties	first point on page	To be scoped in	
20_53	Health & Wellbeing	Construction	Local residents....	fifth point on page and overpage to 20_54	To be scoped in	
20_54	Health & Wellbeing	Construction	Local residents....	first point on page	To be scoped in	
20_54	Health & Wellbeing	Construction	Local residents and owners / operators...	third point on page	To be scoped in	
20_56	Health & Wellbeing	Operation and maintenance	Local residents and owners / operators...	first point on page	To be scoped in	
20_56	Health & Wellbeing	Operation and maintenance	Local residents	third point on page	To be scoped in	
20_57	Health & Wellbeing	Operation and maintenance	Local residents and owners / operators...	second point on page	To be scoped in	
20_59	Climate change	End of life	Global atmosphere...	second point on page	To be scoped in	

FAO: Wing Sum To
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CEMHD - Land Use Planning,
NSIP Consultations,
Building 1.2, Redgrave Court
Merton Road, Bootle,
Merseyside L20 7HS.
NSIP.applications@hse.gov.uk

Date: 25/11/2025

Dear Madam,

**PROPOSED WESTON MARSH TO EAST LEICESTERSHIRE PROJECT
PROPOSAL BY NATIONAL GRID ELECTRICITY TRANSMISSION PLC (NGET)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2017 (AS AMENDED) REGULATIONS 10 AND 11**

Thank you for your e-mail of dated 7/11/2025 regarding the information to be provided in an environmental statement relating to the above project.

HSE's land use planning advice:

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records, the proposed Weston Marsh to East Leicestershire project components as specified in the ***Weston Marsh to East Leicestershire EIA Scoping Report*** (dated November 2025), ***Figure 3.10***, Drawing Number ***WMEL-AAJ-ENVS-ZZZZZZ-DRW-ES-000018***, Rev ***P01***, Drawing Title ***'End to end solution'***, does appear to cross the Consultation Zones of Major Accident Hazard (MAH) sites and MAH pipelines. Please see the lists attached in Appendix 1.

The Applicant should make contact with the operators of MAH sites (see Appendix 1), to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident.

The Applicant should also make the necessary approaches to the relevant MAH pipeline operators (see Appendix 1). There are three particular reasons for this:

- i) the pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.
- ii) the standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation if the development proceeds.
- iii) to establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

HSE's Land Use Planning advice [[HSE: Land use planning - HSE's land use planning methodology](#)] is dependent on the location of areas where people may be present within HSE's land-use planning zones. Based on the information in **Weston Marsh to East Leicestershire EIA Scoping Report (dated November 2025)** it is unlikely that HSE would advise against the development. Please note that the advice is based on HSE's existing policy for providing land-use planning advice and the information which has been provided. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.

Would Hazardous Substances Consent be needed?

Unlikely to be required for this upgrade to the electricity transmission network.

Consideration of Risk Assessments:

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the following Advice Note 11 Annex on the Planning Inspectorate's website - [Annex G – The Health and Safety Executive](#). This document includes consideration of risk assessments on page 3.

Appendix 1

Major Accident Hazard sites:

	HSE Reference	MAH site Operator	MAH site Address
1	H3541	Turners Turkeys Ltd	Cowards Lane, Spalding, Lincolnshire, PE11 3SP

Major Accident Hazard pipelines:

	HSE Reference	Transco Reference	Pipeline Operator	Pipeline
1	11622	N/A	InterGen (UK) Ltd	NTS to Spalding Energy PS Pipeline
2	6906	1181	National Gas	9 Feeder Hatton / A16(T) Road
3	6907	1182	National Gas	22 Feeder Silk Willoughby / A16(T) Road
4	6923	1197	Cadent Gas Ltd	Potter Hill / Balderton
5	6924	1198	Cadent Gas Ltd	Potter Hill / Melton Spinney
6	6925	1199	Cadent Gas Ltd	Melton Spinney / North Witham
7	6926	1200	Cadent Gas Ltd	North Witham / Pinchbeck
8	6927	1201	Cadent Gas Ltd	Pinchbeck / Midville
9	6931	1205	Cadent Gas Ltd	Stretton Lane / Potter Hill

Explosives Sites:

Explosives Inspectorates response is no comment to make as there is no HSE Licensed explosive sites in the vicinity of the proposed development.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk. We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely

CEMHD NSIP Consultation Team

-----Original Message-----

From: Clerk @hickling Parish Council <clerk@hickling-pc.gov.uk>

Sent: 02 December 2025 12:57

To: Weston Marsh to East Leicestershire

<westonmarshtoeastleics@planninginspectorate.gov.uk>

Subject: Response to Western Marsh scoping consultation ref EN0210007

[You don't often get email from clerk@hickling-pc.gov.uk. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Good afternoon.

I write in response to the request for consultation for the Weston Marsh to East Leicestershire development by National Grid Electricity Ref

EN0210007

This matter was discussed at a recent parish council meeting and members of the public raised concerns about the impact of the proposed route on the local environment, being in a countryside area and running very close to farms. The parish council queries why in a world of underground cables this above ground application is being proposed with large pylons that will spoil the countryside views.

Many thanks for taking these points into consideration.

Best wishes



Clerk to Hickling Parish Council



Historic England

Direct Dial: [REDACTED]

Our Ref: PL00799107

Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

4 December 2025

Dear Sir or Madam,

HISTORIC ENGLAND ADVICE

Your Ref: EN0210007

Our Ref: PL00799107

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) - Regulations 10 and 11

Application by National Grid Electricity Transmission plc (the applicant) for an Order granting Development Consent for the Weston Marsh to East Leicestershire Project (the proposed development) Scoping Consultation

Thank you for contacting us on 7th November 2025 regarding the PINS Scoping Request for Weston Marsh to East Leicestershire Project. We have reviewed the documents supplied to us, as referenced below, and have the following comments to make.

- Environmental Impact Assessment Scoping Report (dated November 2025)

We understand the Proposed Development is to reinforce the transmission network with a new 400 kV overhead transmission line over approximately 60 km. The new line starts from new 400 kV substation infrastructure (up to new two substations) at Weston Marsh to the north east of Spalding and continues west to a new 400kV substation proposed to the west of the village of Ab Kettleby and north west of Melton Mowbray, Leicestershire (referred to as 'WMEL-B'), via a new 400kV substation proposed to the west of Coby Glen (referred to as 'WMEL-A'). The Project also includes approximately 66 km of reconductoring of the existing overhead transmission



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line from WMEL-B substation to the existing Grendon substation, east of Northampton.

Historic England Advice

Having reviewed the EIA Scoping Report, we note the principal infrastructure, as set out in Chapter 4, has the potential to have direct and indirect impacts on heritage assets. In particular, the installation of new substations, new overhead cable lines, the reconductoring of the existing overhead cables, and associated temporary works including construction compounds and haul roads. These would include built heritage and buried archaeology of both designated and undesignated status.

Approach to Assessment

We note the proposed study areas presented within Chapter 9 'Cultural Heritage' are a good starting point for identifying potential impacts to heritage assets. This is demonstrated through the identified heritage assets that could be impacted by the proposed development. The further desk-based assessment and investigation proposed in Section 9.8 'Proposed Assessment Methodology' will build on this initial assessment, and we have provided the following comments below to assist with this.

We recommend that a full desk-based assessment is conducted using available datasets to feed into the EIA and inform future surveys and evaluation that may be required. The use of multiple datasets is crucial to an effective process of heritage assessment and management of potential impacts. As such, the detail within Section 9.8 is helpful.

We recommend this approach aligns with current sector good practice, as outlined in the following guidance:

- Geoarchaeology: Using Earth Sciences to Understand the Archaeological Record: <https://historicengland.org.uk/images-books/publications/geoarchaeology-earth-sciences-to-understand-archaeological-record/>
- Deposit Modelling and Archaeology: Guidance for Mapping Buried Deposits: <https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/>
- EAC Guidelines for the Use of Geophysics in Archaeology: Questions to Ask and Points to Consider: <https://doi.org/10.5281/zenodo.10671298>

Additionally, we wish to highlight that within the Environmental Impact Assessment, where likely impacts to designated heritage assets fall below the threshold for a significant effect in EIA terms, they would still need to be reported alongside the Environmental Impact Assessment through a statement of harm as the Examining Authority will need to weigh all harm to designated heritage assets.

Proposed study areas

The proposed 1km and 3km assessment radii from the Scoping Order Limits, are useful starting points. However, we recommend that a flexible approach is taken



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regarding this, and professional judgment should still be applied to include particularly sensitive/important assets beyond the fixed radius. As such, we are encouraged to see the inclusion of further detail within subsection 9.8 regarding the development and refinement of study areas for the Environmental Statement.

This should take into consideration long views from designed landscapes, including designed views from the Registered Parks and Gardens identified on the scoping report.

The search radius for the non-designated assets is best commented upon by the local planning authority's archaeological advisors in this instance.

Heritage Survey Strategy and geoarchaeology

The Heritage Survey Strategy outlined in Appendix 9B provides a clear structure for survey approaches. We welcome the inclusion of LiDAR and modern aerial photograph assessments within this strategy.

However, we note that Table 9B.1 does not appear to include geological sources, such as pre-existing borehole data available from the BGS (although we note this is included in paragraph 9.8.7 of the Cultural Heritage chapter).

We strongly recommend incorporating geoarchaeology into the desk-based baseline. This - along with further geoarchaeological ground investigations-will support the development of an initial deposit model, which can be refined as further data becomes available during the works.

Geoarchaeology and Geotechnical investigations

Where the desk-based assessment identifies gaps in the geoarchaeological baseline, opportunities should be sought to align with intrusive ground investigations undertaken for geotechnical design.

Involving an experienced geoarchaeologist in designing the geotechnical programme ensures that investigations also enable effective archaeological assessment. Failing to integrate archaeological considerations now may mean that GI data cannot sufficiently support geoarchaeological analysis.

Early collaboration between geotechnical engineers and archaeologists ensures that data collection is both relevant and robust for geoarchaeological purposes. It also facilitates the identification of synergies and can reduce the risk of redundant or repeated investigations later in the project lifecycle.

Historic England's guidance on Geoarchaeology (2015) supports this approach:

<https://historicengland.org.uk/images-books/publications/geoarchaeology-earth-sciences-to-understand-archaeological-record/>

Geoarchaeology and Geophysical investigations

Currently, paragraph 9.8.9 of the cultural heritage strategy can be interpreted as





indicating that geoarchaeological fieldwork may not start until archaeological evaluation (in the form of trial trenching) begins.

If there are substantial gaps in the desk-based geoarchaeological work filling these in at this late stage may be problematic. This would mean the window to develop a fuller model that could inform the selection of appropriate geophysical survey techniques could be missed.

Being fully informed when selecting geophysical survey techniques is crucial because of the variation in landscapes and environments the scheme will traverse. This helps avoid the selection of unsuitable methods (e.g., magnetometry in areas with deep alluvial deposits that may obscure archaeological features) that may fail to provide useful information. A proactive geoarchaeological approach reduces the risk of collecting inadequate data and helps prevent delays.

Regardless of the geophysical survey technique selected, it is essential to ensure that provision is made for the deposition of an appropriate range of geophysical data-not just the processed results-with a trusted digital repository that holds CoreTrustSeal certification. This is particularly important in areas where future geophysical survey work may be restricted or rendered impossible due to construction, post-construction, or decommissioning activities.

The geophysical archiving approach should align with best practice for digital data management in archaeology, as outlined in:

- Toolkit for Managing Digital Data (Dig Digital):
<https://www.archaeologists.net/work/toolkits/dig-digital/introduction>

Proposed Data Sources

In paragraph 9.8.7 of the Cultural Heritage chapter a list of published regional studies and character assessments is listed. Alongside these we would recommend seeking out ongoing schemes and projects that traverse or investigate the same landscapes as WMEL.

Schemes may not be able to provide data yet due to confidentiality issues, but where data can be shared the opportunity should be sought to reduce duplication and ensure greater efficiency.

We would particularly recommended seeking opportunities to engage with Cambridge University's FENSCAPES research project:

<https://www.arch.cam.ac.uk/research/projects/current-projects/fenscapes-archaeology-natural-heritage-and-environmental-change>

Early prehistory

The strategy laid out for the Heritage Survey Strategy in table 9B.1 in Appendix 9B



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sets out a standard archaeological process for investigating sites to understand their potential and significance. This includes walkover survey, geophysical survey and trial trenching.

It is important to ensure that where the Desk-Based Assessment (DBA) has indicated potential for earlier prehistoric activity to be present that provision is made for investigation techniques appropriate to the identification and evaluation of earlier prehistoric activity. This may include targeted surveys focussed on understanding ploughzone assemblages such as lithic scatters, which are not well served by traditional survey approaches.

As highlighted in Historic England's guidance Managing Lithic Sites (2024, p. 16), standard evaluation techniques-such as geophysical survey and trial trenching-are generally unsuitable for identifying or accurately assessing lithic scatters. In trial trenching the removal of the deposits containing the lithic resource is integral to the approach. Unsuitable techniques can result in the underestimation of the resource or even its inadvertent destruction.

Historic England's guidance on lithic scatters can help in the development of appropriate evaluation approaches:

[<https://historicengland.org.uk/images-books/publications/managing-lithic-sites/>](https://historicengland.org.uk/images-books/publications/managing-lithic-sites/)

Water Environment

Chapter's 10 and 11 set out how the water environment and hydrogeology assessments will consider the potential likely significant effects on receptors. We were pleased to see in paragraph 11.7.4 the recognition that alterations to the water environment can have an impact on the preservation of archaeological remains which rely on water for preservation.

Concluding remarks

Further to the guidance set out in paragraph 9.2.2 and included above, we would also take the opportunity to highlight the relevance of our other published specialist guidance:

- Preserving Archaeological Remains: Decision-taking for Sites under Development: [<https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>](https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/)
- Curating the Palaeolithic: [<https://historicengland.org.uk/images-books/publications/curating-the-palaeolithic/>](https://historicengland.org.uk/images-books/publications/curating-the-palaeolithic/)
- Commercial Renewable Energy Development and the Historic Environment: Historic England Advice Note 15: [<https://historicengland.org.uk/images-books/publications/commercial-renewable-energy-development-historic-environment-advice-note-15/>](https://historicengland.org.uk/images-books/publications/commercial-renewable-energy-development-historic-environment-advice-note-15/)



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Historic England

We also refer you to the expertise of your local government Archaeological and Heritage Advisors and District Conservation Officers.

Please copy future correspondence to e-midlands@HistoricEngland.org.uk.

Yours Sincerely

[REDACTED]

Inspector of Ancient Monuments

E-mail: [REDACTED]@HistoricEngland.org.uk



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Telephone 0121 625 6888
HistoricEngland.org.uk

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From: clerk@houghtononthehillpc.org.uk <clerk@houghtononthehillpc.org.uk>

Sent: 14 November 2025 16:29

To: Weston Marsh to East Leicestershire

<westonmarshtoeastleics@planninginspectorate.gov.uk>

Subject: RE: EN0210007 - Weston Marsh to East Leicestershire - EIA Scoping and Consultation and Regulation 11 Notification

You don't often get email from clerk@houghtononthehillpc.org.uk. [Learn why this is important](#)

Dear Officer,

This is to notify you that the Parish Council does not have any comments.

Regards

A black rectangular box used to redact the signature of the Parish Council Clerk.

Clerk to the Parish Council

Pathfinder House, St Mary's Street
Huntingdon. PE29 3TN
Developmentcontrol@huntingdonshire.gov.uk

01480 388424

www.huntingdonshire.gov.uk

Katie Norris
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Sent by email: westonmarshtoeastleics@planninginspectorate.gov.uk

11th November 2025

Dear Sir/Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by National Grid Electricity Transmission plc (NGET) (the applicant) for an Order granting Development Consent for the Weston Marsh to East Leicestershire (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

PINS reference: EN0210007
HDC reference: 25/02155/COA

Thank you for your letter dated 7 November 2025 regarding the Weston Marsh to East Leicestershire project.

Having reviewed the details of the proposed Development Consent Order, Huntingdonshire District Council confirms that the development lies well outside the Council's administrative boundaries and will have no effect on the District.

Accordingly, the Council has no comments to make on the Environmental Statement scoping process and can confirm that HDC does not intend to participate in the DCO process for this scheme. We respectfully request that the Planning Inspectorate does not consult us on any further stages of this application.

Should you have any further queries, please contact [REDACTED] [REDACTED] via email at [REDACTED] [\[REDACTED\]@huntingdonshire.gov.uk](mailto:[REDACTED]@huntingdonshire.gov.uk).

Yours Sincerely,

[REDACTED]

██████████ – Chief Planning Officer
Development Services
Corporate Delivery
Huntingdonshire District Council

By e-mail
5th December 2025

The Planning Inspectorate
Environmental Services
Operational Group 3
Temple Quay
2 The Square
Bristol
BS1 6PN

Your ref: EN0210007

Kilinside Energy Park Limited

Response to Scoping Consultation for Weston Marsh to East Leicestershire

Dear Sir / Madam,

I am writing on behalf of Kilinside Energy Park Limited (KEPL), which is progressing a solar generating station through the Development Consent Order (DCO) process under the Nationally Significant Infrastructure Project (NSIP) regime. The Kilinside Energy Park project is currently in the preparation process for statutory consultation, which is envisaged to take place in the early part of 2026. Our site is located approximately 7 km south of the proposed Weston Marsh to East Leicestershire (WMEL) project.

KEPL seek confirmation that the project will facilitate customer connections for renewable energy developments such as Kilinside Energy Park. This is central to achieving the government's clean power system target by 2030 and aligns with WMEL's stated purpose of enabling greater connectivity for renewable energy generation sources. We are concerned that this is not clearly addressed in the Scoping Report (as set out in this letter) and believe early collaboration between our projects is critical to ensure integrated planning and good design.

We note the recent Environmental Impact Assessment (EIA) Scoping Report submitted by National Grid Electricity Transmission plc (National Grid) for WMEL (November 2025). Although our exact Point of Connection (PoC) has not been confirmed by National Grid, we are currently assuming that our connection could be to the WMEL transmission line via the proposed 'WMEL-A' substation. On this basis, Kilinside Energy Park may be physically interacting NSIP for the WMEL project.

KEPL is writing this response to the consultation on the WMEL Scoping Report, as due to it holding an electricity generation licence under section 6 of the Electricity Act 1989, it is a statutory undertaker that could be affected by the WMEL scheme and is therefore a 'consultation body' for the purposes of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

KEPL note that paragraphs 5.5.2 - 5.5.3 of the WMEL Scoping Report highlight the importance of assessing cumulative effects and collaborating with customers, other developers, and statutory consultees. They state (our emphasis added):

*“The assessment of cumulative effects will form a key element of the EIA for this Project (...) In addition, other proposed infrastructure projects are currently being developed within the region including various solar developments, housing, and the Lincolnshire Reservoir and pipeline project. **The Applicant is currently working closely with a number of these projects to provide a co-ordinated approach to project development, where possible**” and*

*“...As far as possible, the Project team will collaborate with **customers, other developers** and relevant statutory consultees, to identify information which may be pertinent to the assessment of cumulative effects”*

Since May 2025, KEPL has proactively sought engagement with the WMEL project team to discuss potential interactions, cumulative effects, and opportunities for collaborative design. Despite multiple approaches, including an initial request for a confidential meeting, no meaningful response has been received. As a potential ‘customer’ and ‘other developer’, we would encourage this collaboration and believe early engagement between our projects is essential.

Moreover, as a potentially interacting NSIP project ahead of WMEL in the planning process (and a project already registered with PINS), we are concerned that the Kilnside Energy Park is not identified in the WMEL Scoping Report in relation to potential cumulative effects and would request that the Kilnside Energy Park is considered by National Grid in its future environmental assessment and design work for WMEL.

From an alternatives perspective, we note that the location and design of the WMEL-A substation should be being brought forward through National Grid working collaboratively with KEPL and other projects seeking to connect into that substation. This approach would avoid KEPL or others having to make later arguments that other locations/designs would be a reasonable alternative, particularly given a stated aim of the WMEL project to facilitate greater connectivity with renewable energy production. The Stage 1 Consultation Report¹ confirms this intent, stating (our emphasis):

*“We are proposing to locate the new WMEL-A substation to the north of the A151, west of the East Coast Mainline and alongside the existing overhead line near Corby Glen in Lincolnshire. **The new substation will allow connection to new renewable energy generation sources and help transport power along the new overhead line**”*

This aligns with the broader objectives of National Grid’s Great Grid Upgrade, of which WMEL is a key component. National Grid describe the Great Grid Upgrade on their website as:

*“The largest overhaul of the electricity grid in generations. Our infrastructure projects across England and Wales are **helping to connect more affordable sources of home-grown and renewable energy** to your homes and businesses”²*

¹ <https://www.nationalgrid.com/document/561351/download>

² <https://www.nationalgrid.com/the-great-grid-upgrade>

Whilst we acknowledge that WMEL is not a customer-driven project and that its primary purpose is to accelerate network reinforcement and create an east-west corridor, we consider that the opportunity to connect renewable energy developments along the alignment should be explicitly addressed.

In our view, the WMEL Scoping Report should be explicit as to how it will facilitate customer connections such as solar generating stations like Kilnside Energy Park, which form an essential part of achieving the government's goal for a clean power system by

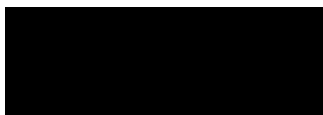
2030³. A number of solar generating station developments are/will be hoping to connect into these substations and so WMEL should be progressing and designing the project to facilitate that.

Furthermore, in light of the increased focus on 'Good Design' in both the National Policy Statement and the PINS Advice Page on the topic, KEPL consider that engaging on a substation that can minimise the impacts of multiple projects connecting into it will be an important part of the WMEL project being able to demonstrate that it has undertaken a good design process.

We would therefore welcome engagement with National Grid in order to discuss our collective projects, seek confirmation from the National Grid team that Kilnside Energy Park will be considered within any future cumulative assessment work, and explore collaborative design solutions.

Given the statutory and practical importance of integrated planning between NSIPs, we consider this engagement essential to ensure compliance with EIA requirements, to avoid any design conflicts and to develop appropriate mitigation measures where required.

Yours sincerely,



Head of Development (UK)

Aukera Energy

cc. westonmarshtoeastleics@planninginspectorate.gov.uk
ContactWMEL@nationalgrid.com

³ [Clean Power 2030 Action Plan - GOV.UK](#)

From: [REDACTED]@West-Norfolk.gov.uk>

Sent: 26 November 2025 11:35

To: Weston Marsh to East Leicestershire

<westonmarshtoeastleics@planninginspectorate.gov.uk>

Subject: EN0210007 - Weston Marsh to East Leicestershire - EIA Scoping and Consultation and Regulation 11 Notification

You don't often get email from julie.barrow@west-norfolk.gov.uk. [Learn why this is important](#)

Dear Sirs,

We are in receipt of your letter dated 7 November 2025 in respect of the Applicant's request for a Scoping Opinion for the above-mentioned project.

The Borough Council of King's Lynn & West Norfolk work closely with Norfolk County Council in respect of all NSIPs located within or in close proximity to Norfolk. We are in receipt of NCC's response on this matter and would concur that there is a need to consider the cumulative impacts of the various National Grid Projects that are proposed in and around the area. It is agreed that there is a need to consider both the potential cumulative impacts and the wider potential opportunities for coordination between Projects.

Regards,

[REDACTED]

Principal Planner - (Major/NSIPs) Team Leader

Environment & Planning

Direct Dial: [REDACTED]

Mobile: [REDACTED]

[REDACTED]@west-norfolk.gov.uk



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Environment Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Date: 5th December 2025
My Ref: NGETEIASO
Your ref: EN0210007
Contact: [REDACTED]
Phone: [REDACTED]
Email: [REDACTED]@leics.gov.uk

Dear Sir/Madam

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) –
Regulations 10 and 11**

**Application by National Grid Electricity Transmission plc (NGET) (the
applicant) for an Order granting Development Consent for the Western Marsh
to East Leicestershire (the proposed development)**

Thank you for your letter dated 7th November 2025 requesting any comments on the EIA Scoping Report dated November 2025 prepared by National Grid in support of the above proposal. Please find comments on behalf of Leicestershire County Council attached.

Should you require any further information, please do not hesitate to contact me.

Yours faithfully



Interim Head of Planning, Historic and Natural Environment

Chief Executive's Department
Leicestershire County Council, County Hall, Glenfield, Leicestershire LE3 8RA

[REDACTED] [REDACTED] [REDACTED]

[REDACTED], CBE, MA, Dipl. PA, Chief Executive
[REDACTED], MSc, Dipl. PLM, Assistant Chief Executive

www.leicestershire.gov.uk

<u>Introduction</u>	Section 1.4.1.	Note, the local authority Melton Borough Council is in Leicestershire, not Lincolnshire.
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<u>Description of the Project</u>	4.6.8 – 4.6.15 Pages 71 - 73	<i>Materials (minerals)</i> With regards to minerals only, the extensive application site straddles Mineral Safeguarding Areas as identified on the supporting documents for the Leicestershire Minerals and Waste Local Plan (2019-31) (LMWLP). Policy M11 of the LMWLP outlines that minerals will be protected from permanent sterilisation by other development, in addition to its supporting text. Planning applications for non-mineral development within a Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. The County Council welcomes that this is recognised in paragraph 4.6.13 of the N0210007-000012-EN0210007 Scoping Report Main Report and that an appraisal of the effects of the Project against relevant minerals policy will be submitted. This should include a qualitative assessment (quantitative where possible) of impacts upon potential underlying, adjoining or adjacent mineral resources and any affected infrastructure. This assessment should be framed in the context of the extensive occurrence of sand and gravel within all counties and the national need/significance of sand and gravel resources. If it is found, after full and robust assessment, that the potential impact of sterilising minerals underlying and adjoining the scheme may be of a small volume, the consideration of this volume and its significance of impact should be weighed against the current 3.15 year landbank for sand and gravel within Leicestershire as set out within the latest 2025 Local Aggregates Assessment (LAA - reporting on 2024 minerals sales data). Whilst this LAA is yet to be ratified by the East Midlands Aggregate Working Party, these figures are not set to change as part of this upcoming ratification process. On the above basis, the topic of minerals safeguarding should be scoped in as there may be likely significant impacts upon mineral resources within Leicestershire, if not, likely significant impacts on the wider spatial scale across the East Midlands (on a cumulative basis). Such assessment of likely significant impacts should be quantitative where possible. The assessment should contain: • the likelihood of effects from the actual requirements for minerals; • the source and quantities of minerals required and any impacts upon Leicestershire's landbank for sand and gravel and crushed rock (in addition to wider cross-boundary impacts with adjacent administrative areas and impacts upon regional flows of minerals and supply and demand);
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		consideration of the above, against the backdrop of a number of large infrastructure projects in the region. A full assessment of the cumulative impacts of projects should be included. <i>Waste</i> It is noted that the Scoping Report states that likely significant effects on water resources, air quality, noise or traffic resulting from the generation, handling, on-site temporary storage or off-site transport of materials and waste would be assessed in other relevant chapters within the ES. The ES should identify likely waste streams, and should ensure an assessment of effects during construction, operation and decommissioning. It is considered that impacts associated with management of waste do not need to be addressed in detail in the standalone Materials and Waste ES Chapter provided that adequate cross referencing is made to where it is addressed elsewhere in the ES, to ensure a full and robust assessment is undertaken. With respect to waste safeguarding, it is not considered that the proposal would have significant implications for the safeguarding of existing waste facilities given the proposed location of the built development within the project. As such, this aspect can be scoped out. However, impacts upon existing waste facilities within Leicestershire and the potential for significant arisings of waste generated within the county as a result of the construction phase of the scheme must be scoped in. It is agreed that operational waste and materials for an infrastructure project of this nature will be negligible and not quantifiable and can be scoped out. The ES must be supported by a review of local waste disposal sites in line with the requirements of the Overarching National Policy Statement for Energy (EN-1) (Department for Energy Security and Net Zero, 2024) and the LWMLP. The application must be supported by a robust assessment of the existing waste management capacity in Leicestershire, to determine whether sufficient capacity exists to accommodate the forecast resultant waste arisings from the project over the Plan period and the likelihood for any significant impacts. As part of the assessment of effects, the ES should consider: • an approximate estimate of materials used in the construction of the Proposed Development, based on worst-case parameters; • the type, volume and sources of materials required; the volumes and nature of wastes generated; and • the likely impacts upon waste capacity in Leicestershire and adjoining administrative areas and the potential for cumulative impacts; • the likely generation of traffic as a result of any movements of materials or waste;
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		the impacts of waste generated upon climate change. Overall, notwithstanding the basis of the information provided within the request, it is considered that the above aspects of the topics waste and materials (minerals) must be scoped in for further assessment as part of the application for development consent. With respect to the above, it is noted that paragraph 4.6.14 of the Scoping Report concludes that it is unlikely that any assessment of waste generation during the construction phase would identify a likely significant effect, this is not agreed with on the basis that at this stage and without the full assessment being completed, there is insufficient evidence to draw conclusions at this stage.
<u>Ecology and Biodiversity</u>	Section 8 Pages 188 - 249	The following have been reviewed: - Environment Impact Assessment Scoping Report - EN0210007 (National Grid, Nov 2025) - Environmental Impact Assessment Scoping Report Figures 1.1 to 6.4 (National Grid, Nov 2025) - Environmental Impact Assessment Scoping Report Figures 6.5 to 9.1 (National Grid, Nov 2025) - Environmental Impact Assessment Scoping Report Figures 10.1 to 10.3 (National Grid, Nov 2025) - Environmental Impact Assessment Scoping Report Figures 10.4 to 12.2 (National Grid, Nov 2025) - Environmental Impact Assessment Scoping Report Figures 13.1 to 16.2 (National Grid, Nov 2025) - Environmental Impact Assessment Scoping Report Appendices (National Grid, Nov 2025) The scoping report is acceptable detailing ecological constraints as well as providing information on ongoing surveys. The methodologies from Section 8A Ecology Survey Strategy in the Appendices is also acceptable. However, it should be noted that the Local Nature Recovery Scheme (LNRS) has been published on the 1st August 2025 for Leicestershire and should be duly considered within the Environmental Impact Assessment regarding maintaining/establishing wildlife corridors as well as assessing the impacts on priority species and providing the correct strategic significance for Biodiversity Net Gain. Overall, in regard to evaluation and impact assessment, the Ecological Assessment (when completed and submitted as part of the application) should: - include an analysis of the importance of the recorded habitats and species in a local and national context.

		• set out the impact of the proposals on significant habitats, statutory and non-statutory sites, wildlife corridors, habitat connectivity and the wider ecological network, including impacts on habitats off-site – for example on nearby watercourses and adjacent habitats. • Identify the potential impacts of a development on linkages between habitats, both current and potential, such as ecological connectivity between individual woodlands within the landscape. • Identify and mitigate for indirect accumulative impacts, such as through increased road traffic, disturbance or lighting. <u>Biodiversity Net Gain (BNG) specific advice:</u> In the event that the application is submitted in May 2026 or later, the following will apply: • When providing information on BNG, please use the Statutory BNG Metric only to record all on-site habitats – The person who completed the metric should fill in the front page and date of completion. • Ancient or veteran trees should be recorded individually. • Completed condition assessment sheets should be provided of all habitats with explanations filled in. • A BNG report should also be provided, confirming the BNG Metric values and baseline habitats. • Irreplaceable habitat should also be recorded if present. • Due to the large nature of the site, it would be appreciated if parcels of land are labelled accordingly and referenced within the BNG metric using the user comments section. • Strategic significance should follow in line with areas and habitats identified in the Local Nature Recovery Strategy (LNRS) and should follow the rules set out by the Statutory Metric User Guide.
<u>Cultural Heritage</u>	Section 9 Pages 250 - 276	The following documents submitted by National Grid Electricity Transmission plc (NGET) in support of the Project have been reviewed: • Scoping Report Main Report, Chapter 9: Cultural Heritage • EIA Scoping Report Figures 1.1–6.4 • EIA Scoping Report Figures 6.5–9.1 • EIA Scoping Report Appendices 9A (Designated Heritage Assets) and 9B (Cultural Heritage Survey Strategy) Early consultation and consideration of potential impacts on both designated and non-designated heritage assets

		are appreciated. The assessment is required to meet the developer's obligations under Section 39, Schedules 9 9i(a) and (b) of the Electricity Act 1989. The Scoping Report Main Report (the Report) and accompanying figures and appendices, provide an adequate overview of the main project, with cultural heritage and the historic environment given specific focus in Chapter 9. The data principally comprises designated heritage assets (scheduled monuments, listed buildings, conservation areas and registered parks & gardens), representing those of the highest significance, but in quantity a minority of the known assets likely to be affected by the scheme. The Report and Cultural Heritage Survey Strategy (Appendix 9B) make clear that further stages of assessment and consultation, will include identification and consideration of the much larger non-designated component of the resource. The latter are largely held within the respective County Historic Environment Records (HERs). It should however be recognised that as a large proportion of the Study Area has not been previously subject to systematic archaeological survey, a significant number of previously unidentified heritage assets, including remains potential of national significance, may be identified during the up-coming survey stages. It is noted that Design Measures (9.6.1-2) are intended to avoid physical impact to designated heritage assets, and that the scheme will endeavour to extend this approach to non-designated assets. Appendix 9B Cultural Heritage Survey Strategy defines the process by which the scale and scope of development impact will be identified. Information gained as part of this process should be used to feed into the design process and to inform strategies such as micro-siting, etc.. Where impact to non-designated assets is unavoidable the Project proposes Control and Management Measures (HO1-3) to mitigate the impact of development. The latter include a suite of standard archaeological responses as outlined in 9.6.3, it is recommended that in order to implement HO1-3, the scheme should make provision for the appointment of Archaeological Clerks of Works, and ensure the provision of toolbox talks, clear and defined communications, programmes of works, plans and timetabling, etc. (9.6.4). Section 9.7 scopes out of the further assessment a series of potential development impacts, based upon the anticipation that the impacts will be slight or can be avoided. Given the sensitivity and significance of designated assets, whilst it is accepted that the Project seeks to avoid all direct impacts the project should continue to actively integrate their consideration into the evolving design methodology.
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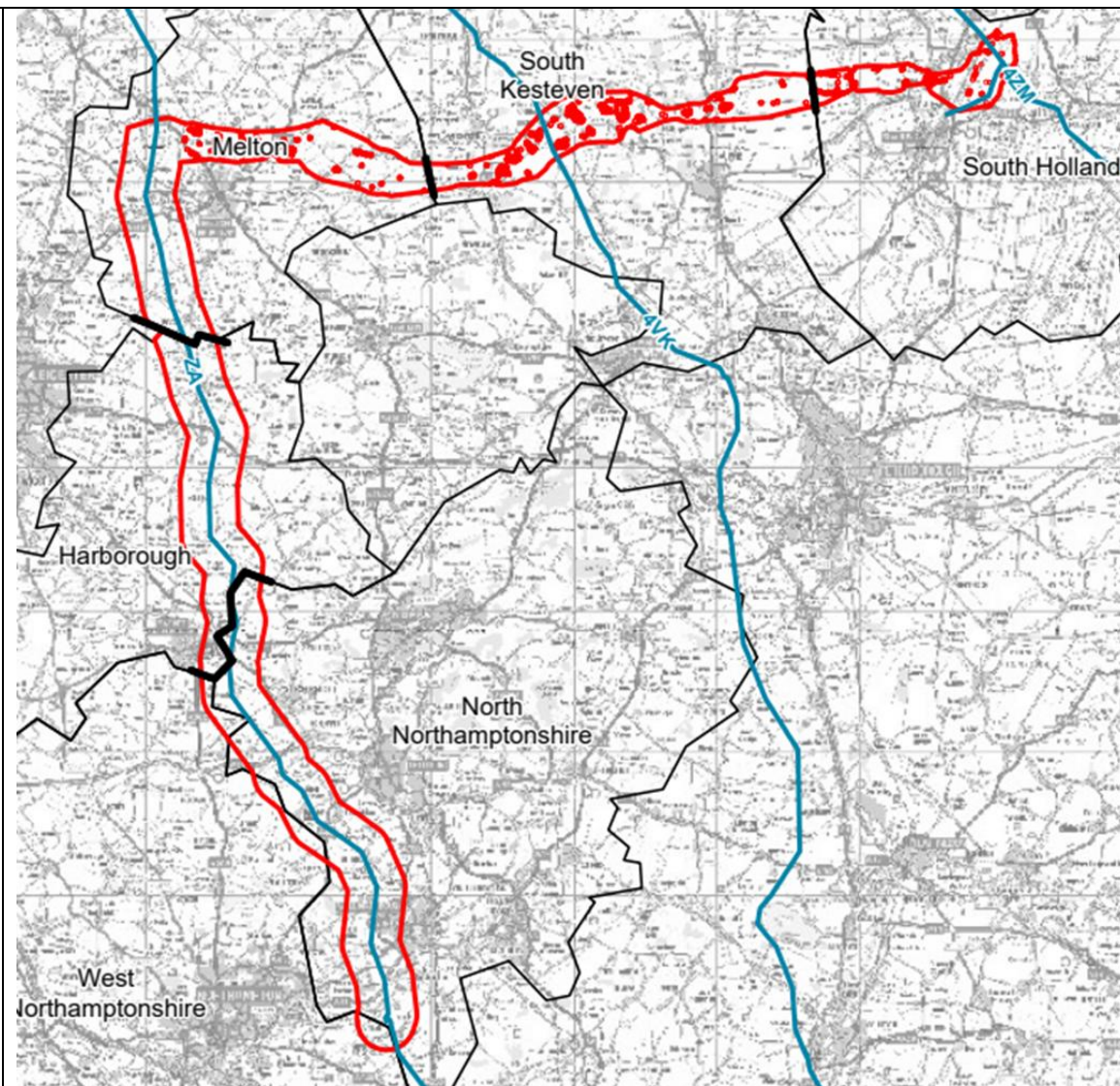
		Section 9.8 outlines the Proposed Assessment Methodology, the latter is also outlined in Appendix 9B. An adequate Study Area is defined in 9.8.2-9.8.6, and suitable data sources outlined in 9.8.7. It is also essential that the project consider the Regional Research Framework and Agenda document to inform the project programme and objectives (https://researchframeworks.org/emherf/). Paragraph 9.8.9 references the application of a range of techniques including geoarchaeological deposit modelling. It is recommended this is prepared as part of the desk-based study, as soon as possible, in order to inform and guide the application of subsequent non-intrusive and intrusive survey techniques, such as geophysical survey and trial trenching. In addition, the developer should consider the use of fieldwalking and or metal detecting as complementary or alternative (where appropriate) survey techniques. Reviewing the proposed timetable suggested in Appendix 9B.1, it is also recommended that the developer consider bringing the geophysical survey forward, at least in respect of available pasture fields. This would also facilitate an earlier start to the trial trenching, a stage that will not benefit from being undertaken over the late autumn and winter of Year 2/3. The Appendix suggests that trenching 2% of the targeted development area is sufficient. However, trenching should be based on achieving a clear understanding of the archaeological resource rather than a fixed percentage. Research (Hay and Lacey 2001) shows that sampling as little as 2% does not adequately assess the archaeological impact of narrow corridor or linear schemes.
<u>Water Environment</u>	Section 10 Pages 277 - 330	Leicestershire County Council, in their role as Lead Local Flood Authority (LLFA) has been requested to provide input to the Environmental Statement (ES) scope for this future application site. The Council advises that the LLFA is not a statutory consultee in relation to Environmental Statements and as such we recommend advice is sought from the Environment Agency in this respect. However, any application for this site will require a Flood Risk Assessment due to the scale of the proposals and existing flood risk within the proposed route, regardless of the need for a flooding/hydrology related chapter within the ES. While the proposals fall over a large area, any introduction of hard standing areas is likely to be limited to specific locations. Access for construction and maintenance may also impact on existing watercourses. The Council therefore offer the following advice.

		Any hard standing introduced as part of the proposals must therefore be suitably placed with respect to flood risk and drain in line with the National Standard for SuDS. These areas are mostly likely to relate to proposed substations and accesses. The LLFA would expect any surface water drainage proposal to seek to infiltrate unless demonstrated to be unfeasible. Such demonstration should include infiltration testing in accordance with BRE Digest 365 Soakaway Design. Should this not be appropriate, the LLFA would expect runoff from site to be discharged to the next most appropriate receptor at the greenfield rate in line with the National Standards for SuDS. Note that the NPPF gives weight to emerging policy with much of Leicestershire's local Boroughs and Districts seeking to implement policy requiring a 20% reduction over greenfield QBar discharge rates. The applicant should ensure that all relevant surface water policy is being considered and that the more onerous elements of relevant policies are used. Any flood risk considerations and surface water proposals should be compliant with the Planning Practice Guidance (which supports the NPPF) and the National Standards for SuDS. The proposals may have the potential to negatively impact on existing sub-surface field drainage associated with existing farming. It is imperative that this is considered within any application, and any severed drainage is re-connected to maintain surface water flows in line with the existing drainage regime. Due to the long distance covered by the proposals, the LLFA expect a large number of instances where ordinary watercourse crossings will be required, either for temporary access during construction, or for permanent access for the lifetime of the development. If you propose to do any works on, or near to, an ordinary watercourse (including ditches) you may need consent from Leicestershire County Council, in their role as Lead Local Flood Authority (LLFA), under the Land Drainage Act 1991 (or with the relevant IDB where appropriate). The LLFA would expect any submission to include identification of any watercourses which may be impacted by the proposals and how risk will be mitigated. Leicestershire County Council opposes the culverting of watercourses; however, we recognise there are situations where culverting may be necessary. In these cases, open span bridges should be considered first as alternatives to culverts. Any application will be required to justify why a culvert is the only practicable option and provide information to show that it will not have a detrimental effect on flood risk, water quality or wildlife. Please refer to our culverting policy on our website. To safeguard access to watercourses for future maintenance, inspection, and improvement works in the future, clear margins should be provided from the top of banks. A minimum clear margin of 3m should be provided from each top of bank for watercourses less than 2 metres in width, a minimum clear margin of 4.5m should be provided
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		for watercourses 2 metres or greater in width. While the LLFA note that any approval of an NSIP application may grant the applicant the ability to forgo formal application for ordinary watercourse consent, the LLFA expect sufficient detail to be provided at application stage and for informal consultation be undertaken with it prior to construction of each element where an ordinary watercourse may be impacted, at the appropriate time. The National Planning Policy Framework (NPPF) is a key part of reforms to make the planning system less complex and more accessible, and to promote sustainable growth. The Environment Agency continue to play a key role working alongside other flood management bodies in preventing inappropriate development in flood risk areas and reducing the causes and impacts of flooding, as a statutory consultee in the planning process. For works upon or near to watercourses, under the terms of the Water Resources Act 1991 and the Land Drainage Byelaws, the prior written consent of the Environment Agency is required for any proposed works or structures in, under, over or within 8 metres of the top of the bank of a watercourse, designated a 'Main River'. Further information can be found on the Environment Agency's Website.
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<u>Traffic and Transport</u>	Section 13 Pages 401 – 437	The Leicestershire County Highway Authority (Leics CHA) is in receipt of an Environmental Impact Assessment (EIA) scoping opinion request from the Planning Inspectorate (PINS) in respect of the National Grid's Weston Marsh to East Leicestershire proposals. National Grid (NG) intends to submit a National Strategic Infrastructure Project (NSIP) Development Consent Order (DCO) application for the Weston Marsh to East Leicestershire NG Upgrade. In preparing this response, the Leics CHA has reviewed the following documents at a high level: • Planning Inspectorate EIA scoping consultation letter dated 07 November 2025; and • Chapters 1 (Introduction), 4 (Description of the Project) and 13 (Traffic and Transport) of NG Report, 'Weston Marsh to East Leicestershire Environmental Impact Assessment Scoping Report' (SR), dated November 2025. Paragraph 1.1.3 of the SR describes the scheme as follows: <i>'The proposal by National Grid (the "Applicant") is to reinforce the transmission network with a new 400 kV</i>
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		<i>overhead transmission line over a distance of approximately 60 km. The new line starts from new 400 kV substation infrastructure (up to new two substations) at Weston Marsh to the north east of Spalding and continues west to a new 400kV substation proposed to the west of the village of Ab Kettleby and north west of Melton Mowbray, Leicestershire (referred to as 'WMELB'), via a new 400kV substation proposed to the west of Coby Glen (referred to as 'WMEL-A'). The Project also includes approximately 66 km of reconductoring of the existing overhead transmission line from WMEL-B substation to the existing Grendon substation, east of Northampton.'</i> For clarity, the Leics CHA has included an extract from Figure 1.1 of the SR, the site location plan, overleaf.
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		It can be seen from the above that the scheme passes through the Leicestershire districts of Melton and Harborough. The Leics CHA would welcome the opportunity to work with the Applicant in respect of the preparation of transport evidence for the forthcoming DCO application. Given the scale of the development, a full Transport Assessment (TA) would be required in support of the Application. Whilst the Leics CHA notes that it is proposed to assess a number of likely significant effects related to transport and access in the EIA, for the avoidance of doubt, the Leics CHA is likely to base its responses to the DCO pre-application and application stages on the TA, rather than the EIA. Accordingly, the Leics CHA welcomes the Applicant's intention to agree the scope of the TA with relevant highway authorities. The Applicant should therefore engage in pre-application transport and highway discussions with the Highway Development Management (HDM) Team at Leicestershire County Council, who can be contacted at hdc@leics.gov.uk in the first instance. The Leics CHA notes the following indication of the scope of a TA which is included in the SR: <i>'13.8.46 The ability of the highway network to accommodate the construction traffic will be assessed and reported in a TA, which will form a separate assessment document to support the application for development consent. The findings from the TA will be used to inform the ES assessment. The TA will include information on:</i> <i>• relevant national, regional and local policies;</i> <i>• the existing baseline conditions including a description of the roads, bus routes, railway lines, footpaths, bridleways, cycle paths and navigable waterways crossed by the route and/or impacted by the works;</i> <i>• personal injury collision data for the most recent five-year period within the proposed Study Area;</i> <i>• details of the Project including a description of the proposed works, the construction programme, compound locations, access routes to compounds, potential road or PRow closures/diversions and construction methods for individual railway, road and navigable waterway crossings (where appropriate);</i> <i>• future baseline including committed developments and transport schemes;</i> <i>• trip generation during construction including worker trips and HGV traffic to/from compounds. Trip generation associated with the operation of the substations and overhead lines;</i> <i>• the distribution and assignment of construction trips on the road network;</i> <i>• the impact of the construction works and operation of the Project (where applicable) on the transport network;</i> <i>• mitigation measures; and</i>
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		• <i>summary and conclusions.</i> The Leics CHA looks forward to detailed discussion with the Applicant on the above. The Leics CHA also advises that the TA, along with any highway designs etc., should be provided in line with the Leicestershire Highway Design Guide (LHDG), which can be found at: https://www.leicestershirehighwaydesignguide.uk/
<u>Air Quality</u>	Section 14 Pages 438 - 460	We recommend a comprehensive evaluation of air quality impacts during both the construction and post-construction phases. This should address cumulative environmental exposures, including air pollution, noise, light, and traffic-related emissions, and assess their potential health impacts on vulnerable groups such as children, older adults, pregnant women, and individuals with pre-existing health conditions. National guidance and international evidence confirm that poor air quality is a leading public health threat, contributing to cardiovascular disease, respiratory illness, and premature mortality, and causing more harm than passive smoking. There is no safe level of exposure to particulate matter, and health effects occur even below legal limits, meaning any increase in pollution—even within acceptable thresholds—can adversely affect health, particularly for vulnerable populations. While the standard 250m buffer for air quality assessment is consistent with current IAQM and EIA guidance, we recommend consideration of a wider study area to 500m from the site boundary. From a public health perspective, there is evidence that construction dust and particulate matter can travel beyond 250m, potentially affecting residents, schools, or ecological sites located further away. The Chief Medical Officer's (CMO) Annual Report on Air Pollution highlights that air pollution affects everyone but disproportionately impacts certain groups. Specifically, it identifies: • Children and young people (especially due to impacts on lung development). • Older adults. • Pregnant women. • Individuals with pre-existing cardiovascular or respiratory diseases. • People living in densely populated or deprived areas. Adopting a precautionary approach and extending the air quality assessment to 500m would ensure that all potentially affected receptors, including these vulnerable groups, are identified and that appropriate mitigation can

		be put in place if required. This is especially relevant in areas with existing air quality concerns, cumulative impacts from other projects, or where vulnerable populations may be present. We therefore recommend that the air quality study area be reviewed and extended beyond the standard 250m buffer to provide a robust and comprehensive assessment.
<u>Noise and Vibration</u>	Section 15 Pages 461 - 485	While a 300m study area is widely accepted as standard practice for assessing construction noise and vibration impacts, we recommend that a larger buffer—up to 500m from the substation boundary—be considered for operational noise assessment. This approach is supported by best practice and industry guidance, which recognise that operational noise sources such as substations can have a more persistent and potentially wider-ranging impact on sensitive receptors, particularly in rural or low-background-noise environments. From a public health perspective, it is well established that chronic exposure to environmental noise can have adverse effects on both physical and mental health, including increased risks of sleep disturbance, cardiovascular disease, stress, and reduced wellbeing. By adopting a 500m buffer for operational noise, we can ensure that all potentially affected receptors are appropriately identified and assessed, providing a robust evidence base for mitigation and community reassurance. This is especially important where substations operate continuously and may generate low-frequency or tonal noise that can propagate further than typical construction activities. We therefore advocate for the operational noise study area to extend up to 500m from the substation boundary, in line with good practice and to ensure a precautionary and comprehensive assessment. We would welcome the opportunity to comment further on noise and vibration once the proposed substation are designed in more detail noting 15.6.3
<u>Socio-economics, Recreation and Tourism</u>	Section 16	The Applicants are made aware that approximately 240 different PROWs fall within the red line scoping area in Leicestershire. At this early stage with so little specific detail, it is not possible to make detailed comments on the potential effect any new construction of power lines will have on all or any of these public paths. The Applicants are advised that when they prepare their EIA and TA they should be aware of all these public rights of way and consider the potential impact the proposed development may have on them, particularly in terms of the

		public's use and enjoyment, which is a material consideration. Particular note should be taken of any potential requirements for permanent diversions that are considered necessary to implement the scheme and any temporary diversions necessary to enable engineering works to be carried out safely. In particular there are several long-distance recreation routes of regional and national significance to be considered, which include The Viking Way, The Jubilee Way, The Midshires Way, The Leicestershire Round and Rutland Round. Digitised data of all the Leicestershire Public rights of Way and these long-distance routes can be made available on request from the PROW Team at footpaths@leics.gov.uk.
<u>Health and Wellbeing</u>	Section 17 Pages 525 - 557	Leicestershire County Council's Public Health team welcomes the opportunity to comment on this consultation. We have reviewed the evidence and documentation and wish to highlight the following points in relation to health and wellbeing. Overarching Health and Wellbeing Considerations We recommend that the assessment gives further consideration to cumulative environmental exposures, including air quality, noise, light, and traffic-related pollution. These factors can have significant health impacts, particularly on vulnerable groups such as children, older adults, pregnant women, and individuals with pre-existing health conditions. A comprehensive examination of these exposures should form part of the assessment. We draw attention to the following key local strategies and assessments: • Leicestershire Joint Health and Wellbeing Strategy (2022–2032) – This sets out the vision and priorities for improving health and wellbeing across the county. While overall health outcomes are generally good compared with England, the strategy identifies widening inequalities, particularly in life expectancy, with faster improvements in the least deprived areas compared to the most deprived. • Leicestershire Health Inequalities Joint Strategic Needs Assessment (2023) – This provides up-to-date local datasets and highlights communities and population groups at greatest risk of poor health outcomes. Although Leicestershire is relatively affluent, pockets of significant deprivation exist, with some neighbourhoods

		falling within the 10% most deprived nationally. These disparities must be considered when assessing potential health impacts. Health Inequalities We recommend that particular consideration is given to the findings of the Leicestershire Health Inequalities JSNA. The JSNA highlights specific neighbourhoods (middle layer super output areas) at high risk of health inequalities, including: • Charnwood: Loughborough Lemyngton & Hastings, Storer and Queens Park, University, Shelthorpe & Woodthorpe, Syston West, Shepshed East • Harborough: Market Harborough Central • Hinckley and Bosworth: Barwell, Hinckley Central, Hinckley Clarendon Park • Melton: Melton Mowbray West • North West Leicestershire: Agar Nook, Coalville • Oadby and Wigston: Wigston Town, South Wigston The JSNA also identifies populations at higher risk from air pollution and associated health impacts, including: • People who identify as LGBT • People with a disability, including learning disabilities • People who are homeless • Victims of modern slavery • Sex workers • Vulnerable migrants • Carers • People with severe mental illness • Prisoners • People who have experienced trauma • Looked after children and care experienced adults • People living in poverty or deprivation • People from certain ethnic backgrounds, particularly Bangladeshi, Pakistani, or Gypsy or Irish Traveller communities
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		We would recommend that groups identified above are included within the vulnerable groups listed in table 17.6. Consideration should be given to how proposed lines and substations may affect these communities. We are willing to collaborate on mapping relevant data, including traveller site locations, to ensure these factors are fully integrated into the assessment. We strongly recommend that a separate, comprehensive Health Impact Assessment (HIA) is undertaken. This should: Consider cumulative impacts of all environmental exposures (air quality, noise, light, traffic, and electromagnetic fields) in greater detail. Incorporate local health data and evidence from the JSNA and Health and Wellbeing Strategy. As well as assess disproportionate impacts on vulnerable groups and deprived communities and provide a clear framework for mitigation and monitoring to protect health and wellbeing throughout construction and operation phases. Summary of Recommendations: • Extend operational noise assessment buffer to 500m (see Noise and Vibration Chapter recommendations above). • Extend air quality assessment buffer to 500m (see Air Quality recommendations above). • Incorporate cumulative impacts of air, noise, light, and traffic pollution. • Fully consider vulnerable groups and areas identified in local JSNA. • Undertake a full Health Impact Assessment to provide a robust, precautionary approach. • Engage with Public Health for mapping and data support to minimise disproportionate impacts. We welcome continued engagement on this proposal and look forward to working collaboratively to ensure a precautionary, evidence-based approach that promotes health equity and wellbeing for all communities in Leicestershire.
<u>Climate Change</u>	Section 18 Table 18.2	The Climate Change chapter of the Scoping Report provides a thorough overview of the assessment that will take place as a part of the EIA's Environment Statement. Climate Resilience officers at Leicestershire County Council are broadly satisfied that the proposed scope will identify impacts and outline suitable mitigations to be implemented.

		Observations of where changes in scope should be considered within the modular structure are as follows: • A0 Pre-construction stage – This module has not been mentioned at all and therefore presumably has not been scoped. Given the significance of the works involved, it is suggested that emissions from exercises such as ground investigations, surveys and the wider design process could be significant and therefore should be scoped. • A5 Construction – The report states that possible emissions from vegetation clearance and land use change will be assessed in module D but this would be better assessed within A5 as it is a part of the asset's life cycle. • B1 Use – Similarly, emissions that arise from ongoing land use emissions or carbon sequestration would be better assessed within B1 as these are emissions or removals that take place during the asset's life cycle. • B2 Maintenance – This module has been scoped out but activities which would normally be expected to be assessed here are listed under B3 and B4 (e.g. routine inspection site visits). In addition, it is unclear whether the pylons and overhead lines would require some level of planned maintenance such as thermographic surveys to check for faults. • B8 User emissions – The categorisation of T&D losses under B8 is fine but why can these not be quantified? Is there an assumption that could be made regarding network losses per kW transmitted? • C1-C4 End-of-life – The reason for scoping out the end of life modules is noted but, given the report's circular economy aspirations (para 18.6.2), quantifying impacts under modules C3 and C4 in particular could be useful in incentivising greater design circularity. This is especially the case for materials/elements that need to be replaced within the 80 year life cycle of the asset (e.g. insulators). • D Benefits and loads beyond asset life cycle – Care should be taken in allocating the carbon benefit of transmitting renewable energy to the asset in this assessment unless there is a direct causal link between the existence of this proposed asset and the construction of additional renewable energy capacity. The proposed asset in itself does not generate renewable energy. • D (continued) – It is strongly encouraged that the benefits and loads of the asset's materials being reused, recycled or energy recovered be included in module D. This has not been mentioned in the chapter but would, as above, further incentivise the embedding or circularity proposals into the design which is one of the methods through which the design process is proposed to mitigate impacts. • Finally, the application of an uncertainty factor should be considered using a methodology such as the one described in the RICS's 'Whole Life Carbon Assessment for the Built Environment' (second edition). The uncertainty factor chosen should reflect the level of uncertainty at the point the EIA is completed in relation to the design, materials quantities and data quality. This would prevent potential underestimation of impacts resulting from a lack of detail in the design at the point the assessment is carried out.
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	Appendix 18A	<u>Appendix 18A – Climate Change Resilience Screening Assessment</u> The Climate Change Resilience Screening Assessment considers and addresses a wide range of risks posed to the asset by climate change. Climate Resilience officers at Leicestershire County Council note the conclusion that a standalone CCR assessment can be scoped out from the EIA based on the proposed measures to mitigate and adapt to impacts. However, further detail in the following areas would be appreciated: • The CCR assessment states that the asset’s life span will be 40 years, however this could be longer with the proper maintenance and component replacements. The assessment also notes that it is unusual for an asset such as this to be decommissioned, therefore pointing to a significantly longer period of time over which overhead transmission lines will be present in this location. Despite this, the UKCP18 data used to inform the assessment does not go beyond 2079. It is not made clear what year other data used such as probabilistic projections and UKCP18 factsheets extend to. Therefore, can we be certain that the risks identified and their severity will be applicable beyond a 40 year time horizon? • It would be helpful to understand if the compound and cascading nature of risks posed by climate change have been considered as there is limited mention of such risks in the assessment.
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From: Service Information Team <info@leics-fire.gov.uk>

Sent: 11 November 2025 15:00

To: Weston Marsh to East Leicestershire
<westonmarshtoeastleics@planninginspectorate.gov.uk>

Cc: Service Information Team <info@leics-fire.gov.uk>

Subject: RE: EN0210007 - Weston Marsh to East Leicestershire - EIA Scoping and Consultation and Regulation 11 Notification

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Good afternoon

Thank you for the consultation in relation to the proposed EN0210007 - Weston Marsh to East Leicestershire development. Leicestershire Fire and Rescue Service do not have any comments in relation to the proposed development at this time.

Kind regards

Service Information Team

Leicestershire Fire and Rescue Service

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Our Purpose: safer people, safer places

Our Behaviours: Professional, Positive, Honest

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Date: 5th December 2025

Dear Sir/Madam,

Ref: EN0210007

Proposal: Scoping Consultation under The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by National Grid Electricity Transmission (the Applicant) for an Order granting Development Consent for the Weston Marsh to East Leicestershire (the Development)

Thank you for your letter dated 7th November 2025 consulting Lincolnshire County Council (LCC) on the Environmental Impact Assessment Scoping Report produced by National Grid dated November 2025.

LCC has reviewed the information in the Scoping Report and accompanying appendices and have the following comments to make in respect of the scheme elements falling within Lincolnshire and scoping boundary shown in figures 1.1 and 1.2 (Sections 1 and 2) [please note there are 5 plans with reference 1.2 and our response relates solely to the area falling within Lincolnshire] in the Environmental Impact Assessment Scoping Report Figures 1.1 to 6.4.

The Council maintain its objection (as set out in response to the Applicant's non-statutory consultation) to a route option that does not fully evaluate an alternative sea bed option (i.e. Option 5 Walpole B to Tilbury) and sufficiently balance the national need for safe, secure, affordable and low carbon energy with adverse significant effects to the local environment and the health and wellbeing of residents and communities across the County.

This objection relates not just to the proposed development in isolation, but combined cumulatively with the increasing cluster of nationally significant infrastructure projects in Lincolnshire from the 13 nationally significant sized solar parks in the county to the cluster of energy infrastructure in the east which will provide the connection points from the off-shore wind farms to transfer the generated energy into the national transmission system. The

Council have particular concern about the impact of the combination of impacts of these schemes on the Council's highway network. Should all of these schemes be consented (to date 6 schemes have consent), the construction periods of many of the schemes will overlap. The Council is very concerned that projects are emerging in an uncoordinated way which is resulting in some communities being overwhelmed with multiple projects. Also, the associated layers upon layers of consultation combine with the fear and anxiety that they will miss an opportunity to make representations. It is not always clear what consultation is being undertaken for which project and the sheer volume of documents associated with NSIPs of this nature make it increasingly difficult for communities to engage to the extent that that would wish too.

For the Scoping Report (SR) the Applicant has not made amendments to their Strategic Options Report (SOR) since the publication of the SOR that accompanied the non-statutory consultation earlier this year. The reasoning for discarding the offshore, underground cabling and upgrading existing infrastructure options is very limited in detail.

The Council remains of the view the information in the SOR is outdated.

Comments on the Scoping Document

Alternatives

Schedule 4 (2) of The Infrastructure Planning (Environmental impact Assessment) Regulations 2017 states that an ES must include a description of the reasonable alternatives (e.g. in terms of development design, technology, location, size and scale) studied by the developer which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option including a comparison of the environmental effects. The Council accepts the intention of the Applicant to consider alternatives within the ES, and notes the assessment of strategic, route corridor and alignment options that have already been undertaken to date.

The Council expects to see a discrete section in the ES that provides details of the reasonable alternatives studied and justification for the selection of the chosen options including a comparison of the environmental effects. This should consider the decision not to pursue a seabed option and why the whole development is for overhead lines and why sections of the project have not been identified for underground cables. It is acknowledged the SR does make reference to "*Should underground cables be required...*" (paragraph 4.8.40), however this section of the report (Cable Installation) and throughout, underground appears to have been dismissed.

While para 3.2.2 claims the process is "robust and transparent," the report does not substantiate this. It lacks a clear articulation of the underlying need and provides no comparative assessment of alternative options. Instead, it adopts the conclusions of the Strategic Options Report (SOR) without scrutiny, focusing solely on progressing NGET's preferred solution.

The SOR outlines two key drivers:

1. A shortfall in transfer capability across the B9 boundary
2. Insufficient transmission capacity south of Walpole

As noted in the Council's previous response, there are concerns about the use of Electricity Ten Year Statement (ETYS) boundary analysis as a sole justification for reinforcement. The ETYS framework lacks the granularity and scenario transparency needed to support major infrastructure decisions and does not reflect major power flow restrictions north of the boundary. If the B9 constraint is discounted, the more logical reinforcement would be from Walpole southward, directly addressing the transmission bottleneck. This alternative would likely be shorter, more efficient, and less environmentally intrusive.

Additionally, the SOR now appears outdated. It should be revised to reflect the forthcoming 2025 ETYS (due later this month), as well as the evolving outcomes of Allocation Round 7 (AR7) and NESO's connection reform programme. These developments could significantly reshape the landscape for future network requirements, particularly in terms of generation siting, connection strategy, and regional reinforcement priorities.

In summary:

- Chapter 3 lacks justification of need and fails to assess alternatives
- The SOR presumes conclusions without transparent modelling
- The B9 transfer methodology is flawed
- ETYS boundary analysis should not be used in isolation to justify reinforcements
- The SOR should be updated to reflect the 2025 ETYS, AR7 outcomes, and NESO reforms (all still ongoing)

In considering alternatives the Council requests that this includes further justification for the need for this proposed development as the capacity requirements currently put forward by the Applicant (based on the most recent Electricity Statement) are assessed to be excessive and could actually be met by alternatives to this scheme.

There does appear to be merit in relation to the concerns with regard to the lack of capacity south of Walpole. If B9 is discounted, then a more logic reinforcement would be from Walpole rather than Weston Marsh, with Option 5 Walpole B to Tilbury (subsea) meeting NGET's objective and that of the Council.

Project Description

The Council notes that as with the non-statutory consultation the final alignment of the proposed development, location of construction compounds, haul roads and substations are still to be confirmed and consequently a scoping route corridor is provided as the basis of this scoping request as set out at paragraph 4.1.3 of the main document (Description of the

Project). This limits the ability of the Council to comment in detail on the scope and relevant information that should be included in the ES for the parts of the development that are proposed within Lincolnshire. To assist all involved the Applicant should fix the alignment and design of the proposed development including all permanent and temporary infrastructure required for construction and operation to reduce uncertainties and to enable the Council to consider how it can contribute to the information which is relevant to the preparation of the ES. Where this is not possible the Applicant should be clear about which elements of the proposed development have yet to be confirmed and assess a worst-case scenario and then undertake a further scoping exercise once the final position of the route is determined.

The ES should clearly describe any changes that have been made to the final order limits boundary from the scoping report corridor including reduction or increase in extent or variation of extent and the reasons for such changes.

Cumulative Impacts

Chapter 5, section 5.5 of the SR sets out the Applicant's approach to the proposed assessment of cumulative effects. In relation to inter-project effects the SR explains that the first step has been to identify Zones of Influence (Zoi) for different environmental topics based on distance initially from the Scoping Boundary and then latterly on distances from the proposed Order Limits. However, the Council has concerns how this is set out in Table 5.5 as not all environmental topics have a Zoi and so will not inform the initial review of other projects which may have cumulative effects. For some of the environmental topics listed the Council does not agree with the selected distance of the Zoi and submits that it should be considerably more extensive than the Applicant proposes.

A significant omission is traffic and transport. This is currently based on the Scoping Boundary. The Applicant notes that *"...likely to include areas of the transport network that are beyond the Scoping Boundary. The Study Area will take account of likely access/delivery routes and will consider the extent of likely significant effects on the transport network."* However, this will be too late for the Council to influence the Zoi and is unclear as to how the Applicant proposes to identify other projects which are likely to have cumulative traffic and transport impacts with this project. It is apparent that for this to be based on the Zoi in table 5.5 is not acceptable. Given the location of the SR corridor and proximity to other approved, known and emerging NSIPs in this part of the County, the Council expects to see an extensive geographical scope identified to capture inter-project effects, a point that is being made in relation to other projects and has been made in respect of the Outer Dowsing NSIP application which is currently awaiting a decision by the Secretary of State.

In relation to agriculture and soils, the suggested Zoi is the Scoping Boundary which is simply far too narrow and this needs to be extended significantly as has been suggested on other recent NSIPs in Lincolnshire. The Council considers this needs to be a county-wide assessment. With 24 NSIPs within the County at different stages of progression through the NSIP process all taking a proportion of BMV from relatively modest amounts to significant

areas it is necessary to consider this important topic in a holistic way. Indeed, the Written Ministerial Statement of 15th May 2024 makes reference to clustering of NSIPs in certain geographical locations and gives Lincolnshire as an example. Consequently, it is requested that the ZoI is extended significantly to cover the whole of Lincolnshire so that the potential loss of BMV land in the County can be looked at holistically rather than in a limited way for each individual project.

There is growing evidence that multiple NSIPs located in a relatively small geographical area has impacts on the health and well-being of local communities from the constant round of consultations and engagement fatigue that comes with the promotion of an NSIP and when this is multiplied to a number of projects in a short time period within the same geographical area the impacts on communities health and well-being can be significant. For this reason, the ZoI for health and well-being should be extended to a greater geographical scope than the 500m that is currently proposed and be extended to at least 5km either side of the scoping boundary.

The Council expects to see a more rigorous evidence approach to the selection of the study area(s) used for the assessment of cumulative effects and the proposed approach of using ZoIs for only selected environmental topics is not considered to be adequate as currently presented.

EIA Approach and Methodology

LCC wishes to raise concern about the temporal scope over which the impacts of the development are proposed to be assessed. It is stated in chapter 5.3.12 that the EIA will predict the changes (impacts) to the current and future baseline during the construction and operation phases of the Project. The Council would expect to see decommissioning effects also assessed at this stage.

For the ES to be an open and robust assessment of the likely significant effects, it should provide an assessment over the anticipated life of the development, as far as reasonably possible, so that the full impact of the development can be understood. LCC are of the opinion that the impacts of the decommissioning phase should therefore be included in the assessment.

The timeframe over which impacts could occur during the operational phase are not clear. Consideration should be given to any likely significant effects that may occur as a result of not decommissioning the site. Would a longer operational phase (timeframe unknown) and later decommissioning period or the development becoming a permanent feature change any of the assessed effects or introduce any other or different effects not considered?

LCC would wish to see a clearly defined timescale over which the impacts of the development are being assessed, rather than it being open ended.

Key Technical Issues

Landscape and Visual

As the project is at an early stage, the Order Limits have yet to be defined, with the information presented within the Applicants SR based on a Scoping Boundary. Paragraph 3.7.1 clarifies that to *“retain flexibility, a Scoping Boundary has been defined based on the new overhead line emerging preferred corridor, the new Weston Marsh substation infrastructure Siting Zone, the new WMEL-A and WMEL-B substation preferred Siting Areas, and an assumed area around the existing ZA overhead line to allow for reconductoring works.”*. The Scoping boundary has subsequently been used to consider the potential effects to define the scope of the EIA, as clarified in paragraph 3.7.2.

The Council understands this has been defined to represent the maximum extent of potential development, and we understand that the Scoping Boundary will also undergo refinement and subsequently be replaced by the Order Limits as the scheme progresses.

Therefore, due to this iterative process of refinement, there will need to be further consultation with the Applicant in regards to agreeing the final content and detail of the landscape and visual elements of the submission, particularly if the alignment of the scheme differs greatly from that identified within the Scoping Boundary Area.

The scheme is broken down into five sections in the SR, which provides a useful structure to navigating the scheme descriptions etc. From experience on similar linear infrastructure projects in the County, we anticipate the ES is also proposed to be written to consider each separate stage as a standalone report. This does assist in any future reviews and consultation allowing for the particular interests to be focussed upon, and if this is the case, the Council requests that repetition in the reports created for each stage is kept to a minimum, and common sections are referenced, such as methodology, scheme description etc. This aids the process when reviewing several sections at one time. Also, due to the volume of likely consultation information and extent of potential site visits to cover an extensive study area, the Council also request that we are afforded the maximum time available for this to aid us in providing suitable feedback.

Lincolnshire County Council expects the production of Landscape and Visual chapters to be included within the Environmental Statement (ES), which would be in the form of separate Landscape and Visual Impact Assessments (LVIA), which should, along with any supporting information (such as plans, photographs, visualisations or figures), reflect current best practice and guidance from, as a minimum, the following sources:

- ‘Guidelines for Landscape and Visual Impact Assessment’, (GLVIA3), April 2013 by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA);
- ‘An Approach to Landscape Character Assessment’, Natural England (2014);

- 'Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals', 17th September 2019 by the Landscape Institute (LI);
- 'Technical Guidance Note (TGN) 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)', 10th January 2020 by the Landscape Institute (LI);
- 'Technical Guidance Note (TGN) 04/20 Infrastructure', April 2020 by the Landscape Institute (LI);
- 'Technical Guidance Note (TGN) 2/21 Assessing landscape value outside national designations', May 2021 by the Landscape Institute (LI); and
- 'Technical Guidance Note (LITGN) 2024-01 Notes and Clarifications on Guidelines for the Landscape and Visual Impact Assessment Third Addition (GLVIA3)', August 2024 by the Landscape Institute (LI).

Overall, LCC would expect that the assessment of potential Landscape and Visual effects and evolving proposals relating to the scheme, as a NSIP to follow an iterative process of engagement and consultation to ensure the following are not fixed at this stage and are discussed, developed and agreed at subsequent technical meetings with LCC and other appropriate stakeholders:

- LVIA Methodology;
- Development, and subsequent ZTV, parameters;
- Study Area extents (distance);
- Viewpoint quantity and locations;
- Photomontage/Accurate Visual Representations (AVRs):
- Quantity and location;
- Phase depiction;
- AVR Type and Level.
- Mitigation Measures/Landscape Scheme/Site Layout;
- Cumulative effects, including surrounding developments to be considered; and
- The extent as to which a Residential Visual Amenity Assessment (RVAA) or initial Survey should be considered (based on the Landscape Institute TGN 2/19) if there are residential properties with receptors likely to experience significant effects to their visual amenity.

It is noted that in the SR, Landscape and Visual are proposed as separate chapters, and we anticipate this will be carried forward into the ES. This is acceptable, and while interrelated, the landscape and visual effects should be assessed separately.

The Council has reviewed the SR and the following should be considered in the evolving assessment and layouts:

Methodology

As stated previously, the LVIA should be carried out in accordance with GLVIA3 and associated guidance, and undertaken by suitably qualified personnel. The overview of the proposed methodology provided at paragraphs 6.8.2 to 6.8.25 (Landscape Methodology) and 7.8.2 to 7.8.25 (Visual Methodology) are typical of those used for ES Chapters where potential significant effects can be considered and reflects the guidance in GLVIA3. The Council request that the most up to date technical guidance be used and the full methodology for both Landscape and Visual assessments is provided to allow further interrogation and comment at the next phases of the project.

Table 6.5 Significance of landscape effect and Table 7.5 Significance of visual effects presents criteria for the levels of landscape and visual effect and paragraphs 6.8.22 and 7.8.18 clarify that *“effects rated as being of moderate or major will be considered to be significant, and negligible and minor effects will be considered not significant.”* This is aligned with the approach of similar schemes in the region, and therefore acceptable.

Professional judgement is promoted throughout the Methodology, which is aligned with GLVIA 3; however, it is important that the application of professional judgement be explained and transparent throughout. This is particularly important where the significance of Moderate effects is assessed, particularly where these Moderate effects are judged to be Not-Significant by the author.

One point of note, regarding construction impacts made at paragraph 7.7.3; there is a statement in regard to temporary clearance of vegetation and alteration of landform. These are not temporary actions – vegetation removal is permanent unless the intention is to translocate. It is accepted that new planting may be proposed to mitigate or replace planting lost, but LCC would deem any removal permanent.

Scope of the Study Area

It is acknowledged in Sections 6.4 and 7.4 that an initial study area of 3km has been allowed for due to the potential extensive views possible of the 400 kV overhead line, associated temporary works, and new substations; the Weston Marsh substation and the proposed substations at Corby Glen and west of Ab Kettleby. An initial 3km Study Area has been used for both the Landscape and Visual assessments, measured from the edge of the Scoping Boundary. This study area and Scoping Boundary is illustrated on Figures 6.1 and 7.1.

It is further acknowledged in both chapters that visibility may occur beyond the 3km Study Area; however, the SR indicates that at greater distances, separation and intervening landform/vegetation are likely to limit the potential for significant Landscape or Visual effects.

At this early stage, we recommend that these extents are discussed and reviewed further, as the full extent of potential visibility remains subject to design refinement and detailed Zone of Theoretical Visibility (ZTV) modelling. The Scoping Report confirms that the Study Area will be reviewed and refined at the assessment stage based on the Order Limits, updated ZTV modelling, and targeted field survey, to ensure it remains proportionate and focused on potential for significant effects.

Once the study area has been defined, the LVIA should also provide a justification for the full extent/distance, which would be further refined as part of the iterative process.

Landscape

The landscape baseline and a range of published landscape character assessments have been identified in Section 6.5. Further detail on these character areas is provided in paragraphs 6.5.6 to 6.5.29, which describe the relevant Designations, National Character Areas, Regional Landscape Character Types and Local Landscape Character Assessments applicable across the five Sections of the Scoping Boundary.

However, as the scheme progresses and designs are refined, the Council recommend these are reviewed. To align with GLVIA3, the LVIA should include an assessment of landscape effects at a range of scales and needs to include both relevant published landscape character assessments and the LVIA author's own judgements of the landscape character of the site and study area should this vary from published assessments.

The future Baseline is covered in paragraphs 6.5.30 and 6.5.31. LCC would note this is a landscape under increasing pressure from development, in particular renewable energy schemes at an NSIP scale, as well as associated energy infrastructure upgrades including pylons and overhead lines, substations and converter stations. These other energy projects should also be taken into account.

Visual

The visual amenity baseline is considered from paragraph 7.5.3, which identifies a range of initial visual range of receptors covering residents, users of Public Rights of Way (PRoW), users of promoted recreational routes, users of local recreational facilities, road and rail users and visitors to publicly accessible land across the five Sections of the Scoping Boundary.

However, at this early stage of the project the Council requests these be reviewed, refined and consulted upon further once proposals have been developed: LCC is not in a position to confirm their inclusion or omission at this stage.

LCC would expect that the visual assessment would clearly identify the visual receptors, which would subsequently be the focus of the visual assessment. The LVIA should not just contain an assessment of any agreed viewpoints, it must focus on receptors. The viewpoints are to illustrate the visual effects, and the visual assessment should clearly reference receptors to representative viewpoints to aid this.

The visual assessment should take account of the 'worst case scenario' in terms of maximum parameters and winter views, including effects at construction, Operational Phase (year 1), Residual Phase with mitigation planting having established (10 to 15 years), and at the Decommissioning Phase.

This scheme will likely have extensive adverse visual effects through introducing overhead lines and pylons, as well as introduction of substations and associated infrastructure. This is a very open and flat landscape well served by PROW and local roads. The proposed development is of a large scale, covering an extensive and visible area. Therefore, appropriate and successful visual mitigation through planting is both difficult to achieve in this context, but also could in itself cause adverse effects through foreshortening views or appearing out of character. The alignment and appearance of the scheme is therefore a key consideration in reducing adverse effects.

Viewpoints and Photomontages

At this early stage, no viewpoints to represent views from visual receptors have been identified. Therefore, due to the evolving design, the final locations of viewpoints are to be reviewed and subsequently agreed with LCC and other relevant stakeholders. The final viewpoint selection should consider views of taller and more conspicuous elements, once the scheme layout is more developed, as well as consider potential key, or sensitive, viewpoints and visual receptors. LCC would welcome an initial discussion and subsequent workshop (on site if appropriate) with the Applicant team in regards to proposed viewpoints.

To gain an understanding of the visibility of the scheme and how the development would appear in the surrounding landscape, Photomontages/AVRs should be produced. The number and location of the agreed viewpoints to be developed as Photomontages/AVRs should be agreed with LCC and other relevant stakeholders and produced in accordance with TGN 06/19 Visual Representation of Development Proposals. At this stage, it is deemed appropriate that these should be produced to illustrate the proposals at different phases: Existing Situation (baseline), Operational (year 1) and Residual with planting established (10 to 15 years). The Photomontage/AVR Level and Type, as well as which viewpoints would be developed as photomontages, is to be discussed and agreed.

Cumulative impacts

Paragraphs 6.8.23 and 7.8.19 cover cumulative landscape and visual effects. Cumulative Landscape and Visual effects should be assessed in regards to other major developments, and in particular similar energy infrastructure or renewable energy developments, as appropriate in regards to proximity and scale. This should consider both Combined (in same view) or Sequential (when the observer has to move to another viewpoint to see the same or different developments) effects. Cumulative effects of multiple energy infrastructure schemes across the region, and particularly in this area, are of particular concern, and we would expect a wider consideration of these schemes be considered in any cumulative assessment, as well as an assessment as to how the future baseline will likely be changed

through introduction of these schemes. This is especially the case in the Weston Marsh section of the project.

Due to the scale and extent of the scheme, as well as ongoing development in the region, including other National Grid projects, large NSIP scale solar and BESS, other renewable energy schemes, as well as other energy infrastructure, The Council have a concern in regards to the cumulative effect across the wider region. The East Midlands region is undergoing an unprecedented change from energy infrastructure and generation, in a short timescale. The region shares several key landscape characteristics that span district, regional and national character area, such as being predominantly flat to gently undulating agricultural/rural area, with big skies and sense of openness and tranquillity. This is a concern in both landscape terms through a change in land use, and also visually through the introduction of more industrial scale elements in open views. This should be considered within any LVIA.

Residential Visual Amenity

Paragraph 7.8.22 to 7.8.25 consider Residential Visual Amenity and potential for any Residential Visual Amenity Assessment (RVAA). This section proposes that only residents within a 150m Study Area be considered in regards to any RVAA. At this stage it is currently unclear if there are residential properties with receptors likely to experience significant effects to their visual amenity. Whilst the Council agrees that any RVAA study area should be appropriate, if there are potential significant effects, due to the scale of some of the above ground elements of the scheme, these may ultimately meet the visual amenity threshold and an RVAA, based on the Landscape Institute TGN 2/19, and properties beyond a 150m study area may be required. The scale of the scheme has the potential to give rise to significant effects to local residents, including effects on resident's private visual amenity. The layout should also respond to potential views and proximity to any properties to mitigate any potential adverse effects.

Mitigation and Layout

As this is an iterative process, at this stage it is not relevant to comment on any potential mitigation or layout of the development. However, best practice guidance, relevant published landscape character assessment's and Local and County Council Policy and Guidance shall be referred to and implemented as appropriate.

LCC would also expect any landscape and planting scheme to be co-ordinated with other relevant disciplines, such as ecology, heritage or civils (e.g. SuDS features), to improve the value of the landscape and reflect appropriate local and regional aims and objectives. Planting should be well considered and not just placed to screen proposals, as this may have an adverse effect such as appearing out of character or foreshortening open or panoramic views in this open landscape. A Landscape Scheme and associated Outline Landscape and Ecological Management Plan should accompany the ES which should cover as a minimum

the establishment period, which is anticipated would be up to 15 years to cover the period up to the residual assessment.

The management plan should provide for both new planting and existing retained vegetation and how it will be managed and protected through all phases of the development. Any vegetation loss to facilitate development, including access and wider highways works or abnormal vehicular routes for construction, must be clearly identified in the submission.

Ecology and Biodiversity

Having reviewed section 8 and other sections of the scoping report, LCC supports the approach to the assessment of ecological impacts.

Study Area

The Council agrees that the study area is appropriate and considers that appropriate extensions have been made to the study area to account for the presence of sites designated for highly mobile species such as birds and bats.

Current Baseline

There are a number of internationally important designated sites within 10km of the proposed development identified in Table 8.3 and Figure 8.1. Natural England should be consulted in relation to the requirement for Habitats Regulations Assessments for internationally important designated sites. There are also a series of nationally designated statutory sites (SSSI) identified within 5km in Table 8.4 and Figures 8.2.

The Council notes that non-statutory sites such as Local Wildlife Sites have not been identified in the Scoping Report and advises that a data search with the Lincolnshire Environmental Records Centre based with the Greater Lincolnshire Nature Partnership will be required to identify these sites within Lincolnshire. The Applicant will need to identify potential impact pathways for both statutory and non-statutory sites and their interest features and present an analysis of potential impacts, along with associated avoidance and mitigation measures in the Environmental Statement.

No field surveys have been conducted at this stage of the project and information presented in the report results solely from desk-based studies. Desk based studies have indicated the likely presence of a range of habitats and species within the study area. Surveys to establish the precise locations of these habitats and presence / absence of species will be required to identify any impacts and to inform mitigation and enhancement opportunities.

Scope of the assessment

A summary of potential impacts on ecological features scoped in or out of the assessment is presented in Table 8.5 and in Appendix 8A. Subject to the comments below in relation to the scope of ecological surveys, The Council agrees with the scope of the assessment.

Assessment methodology

Subject to the comments below, The Council considers that the list of surveys set out at 8.9.3 is broadly appropriate.

Specific comments in relation to the proposed surveys are as follows:

- All ecological surveys should follow industry standard guidance.
- The Council will expect to see a plan identifying where any TPO, veteran and ancient trees/woodlands are located within the site and showing that consideration has been given to suitable working distances within proximity to trees. The Applicant should ensure that the most up to date information is being used to assess impacts including from field surveys commissioned in support of the application.
- In addition to this, the AWI generally omits woodlands smaller than 2ha. Therefore, the Applicant should ensure that all woodlands in the ZoI have been suitably assessed during field surveys to clarify the presence / absence of potential ancient woodland.
- Botanical surveys should be appropriately timed and targeted to detect the presence of populations of scarce arable flora within the survey area.
- Breeding bird surveys should be designed to ensure that species whose breeding activity may not necessarily be encompassed within the scope of a standard breeding bird survey (e.g. due to the timing of their breeding activity) are accurately recorded. Relevant species will include but may not be limited to barn owl and quail.
- Given the presence of a number of sites important for their populations of both breeding and wintering birds in the wider area, the Applicant will need to ensure they have access to sufficient data to determine potential impacts on these populations. Consideration should be given to appropriate timing of surveys during the year to detect areas outside the designated site boundaries used by birds i.e. Functionally Linked Land. Ornithological surveys should also cover more than a single year to help ensure that results are not skewed by any particularly harsh weather patterns.

Cumulative Assessment

The proposed approach to the assessment of cumulative effects is covered in Chapter 5.5. There are several development proposals of varying scales in the vicinity of this proposal. These range from small scale housing developments to NSIP scale energy developments. The combined implications of impacts such as habitat loss, habitat fragmentation and disturbance of species will need careful consideration in the final DCO application. The Council agrees with the proposed methodology for the assessment of cumulative effects as set out in Chapter 5.5.

Habitats Regulations Assessment

If the potential for impacts on statutorily designated sites is identified, the Applicant will need to provide the information reasonably required for a Habitats Regulations Assessment. The Planning Inspectorate will need to undertake a Habitats Regulations Assessment and satisfy itself that sufficient information has been submitted by the Applicant to enable this to be completed.

Approach to Biodiversity Net Gain

LCC notes and welcomes commitments in made in 8.2.3 relating to the delivery of “*10% Net Gain in Environmental value including as a minimum 10% Biodiversity Net Gain (BNG)...*”.

No details of how any gains will be achieved are presented at this stage and the Applicant will need to ensure that habitat surveys are carried out to appropriate standards to allow the population of the Statutory Biodiversity Metric and calculation of the level of gains achieved. Details and locations of proposed enhancements and associated management should ideally be provided at PEIR stage.

The Council encourages the Applicant to work both with other National Grid projects in Lincolnshire and with other developers and stakeholders in the county to identify opportunities to deliver BNG strategically. This includes by keeping up to date with emerging local strategies such as the Greater Lincolnshire Local Nature Recovery Strategy.

Commitments to deliver BNG will need to be secured in the DCO and the Applicant will need to demonstrate that the commitments made to delivering BNG are achievable. The Council welcomes the Applicant’s intention at 1.9.11 to establish Technical Working Groups and confirms LCC’s Infrastructure Ecologist will be happy to engage in this process.

Cultural Heritage (Chapter 9)

Archaeology

LCC welcomes the inclusion of historic environment within the scoped in topics but has concerns over the extent, purpose and timing of the archaeological surveys. These should be completed and their results inform the design process and tower location, rather than to facilitate the limited potential for micro-siting within already proposed tower and compound locations.

Regarding the requirements and timing of archaeological work, which will need to be completed before the DCO submission, LCC would expect the desk-based assessment and the air photograph and LiDAR assessments to be complete and the field evaluation to be well underway by the time the PEIR is produced.

The full standard suite of archaeological evaluation is required. It is vital that a competent full desk-based assessment (DBA) be completed at the earliest opportunity as desk-based work provides the basis for initial understanding of the historic environment within the project area. This is informed by and built upon by a full air photographic and LiDAR

assessment and geophysical survey which in turn assists in the development of the trial trenching programme.

Sufficient field evaluation is an essential aspect of effective project management, particularly as unevaluated areas of unknown archaeological potential leave a high degree of risk to the development given the potential for archaeology to have significant impacts on work programmes and budgets. Failure to adequately evaluate the Site at the application stage could lead to unnecessary destruction of heritage assets, potential programme delays and excessive cost increases that could otherwise be avoided. There is no public benefit in the destruction of unknown unrecorded heritage assets.

Sufficient baseline information on the archaeology to be impacted across the site is required by NPPF, EIA Regulations and National Policy Statement EN-1, the latter which states "*The Applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents (5.8.10).*"

LCC note throughout the scoping report that there is no mention of the Lincolnshire Archaeology Handbook (2024)¹, which sets out the requirements for undertaking archaeological work within the County. This needs to be corrected as this represents an invaluable source of guidance and it lays out the requirements for undertaking archaeological work in the County. The Council would specifically refer you to section 5.16: Guidance for large schemes including NSIPs and EIAs, General Scoping Opinion for the Historic Environment. This Archaeology Handbook represents the Brief for archaeological work and needs to be adhered to in all archaeological works, as per Chartered Institute for Archaeologists standards and guidance².

In terms of specific aspects of the Scoping Report:

With regard to the figures provided, the Council considers that there should be greater differentiation between the scoping boundary and scheduled monuments. Both are the same red and it is difficult to discern between the two in some instances. For example, it is particularly difficult to make out the Corby Moated Mound (List Entry Number: 1005001)³ given the scoping boundary overlies it.

Consultation on archaeological matters has yet to commence and LCC await contact from the Applicant's archaeological consultant (Sections 1.9 and 9.3.1) and we note that there is a list of stakeholder engagement in Table 9.1 including our comments at non-statutory consultation stage. Early consultation would have been beneficial in correcting the errors and limitations set out within the SR. Statutory consultation is due in 2026 alongside the PEIR (Section 1.9.10) and technical working groups set up as part of this (Section 1.9.11).

¹ Lincolnshire County Council, Archaeology Handbook, Revised 2024, [Archaeology handbook 2024 - Lincolnshire County Council](#)

² Chartered Institute for Archaeologists, Standards and Guidance, [CifA Codes, regulations and Standards, and guidance | CifA](#)

³ Corby Moated Mound, Historic England, [Corby moated mound, Corby Glen - 1005001 | Historic England](#)

This is too late to have any meaningful input into the process and should have already been initiated inform the Project. LCC await consultation on the Written Scheme of Investigation for the desk-based assessment, aerial photographic and LiDAR assessment and geophysical survey, as per Chartered Institute for Archaeologist requirements and will comment on those once received.

Walkover surveys should be conducted of the full route and not only from Public Rights of Way (Section 1.9.5 and Table 9B.1 Heritage Survey Strategy Appendix). Limiting the survey to PRoWs only will directly impact the quality and effectiveness of the assessment and resulting ES chapter.

The Council notes that the Scoping Report (Section 3.4.9) puts forward the conclusion that overhead lines provide greater opportunity to avoid archaeology. The Council would point out that this is only the case where effective and fit for purpose archaeological surveys have been undertaken early to inform design, not where the surveys have been left to such a stage that there is no capacity to use the results to make meaningful contributions to scheme layout and work locations.

It is recognised that the project design is an iterative process and that the locations of many of the site infrastructure, compounds and access tracks are not yet known (Sections 4.1.3 and 4.3.1) and that the Rochdale Envelope approach is being used, with archaeological remains being used as an example of why the Rochdale Envelope approach is needed (Section 5.2.5). With reference to the comments above on the implementation of an effective programme of archaeological works and that where the developer proposes the Rochdale Envelope in dealing with their application, it is essential that an understanding of the archaeological resource is achieved to allow for informed and appropriate mitigation. This can only be achieved through adequate assessment of the full impact zone and the timely provision of the results of both non-intrusive and intrusive surveys to inform the baseline evidence and subsequent informed fit for purpose mitigation strategy.

This is in accordance with NSIPs Advice Note Nine which states that *“Implementation of the Rochdale Envelope assessment approach should only be used where it is necessary and should not be treated as a blanket opportunity to allow for insufficient detail in the assessment. Applicants should make every effort to finalise details applicable to the Proposed Development prior to submission of their DCO application. Indeed, as explained earlier in this Advice Note, it will be in all parties’ interests for the Applicant to provide as much information as possible to inform the Pre-application consultation process.”*⁴

Section 4.6.12 covers soils and their remediation. Any works for soil remediation may have archaeological implications and therefore need to be included within the surveys and final

⁴ Paragraph 5.2, Planning Inspectorate, Nationally Significant Infrastructure Projects – Advice Note Nine: Rochdale Envelope, updated 25 March 2025, [Nationally Significant Infrastructure Projects - Advice Note Nine: Rochdale Envelope - GOV.UK](#)

Archaeological Mitigation Strategy and Management Plans. Where groundworks encounter contaminated ground unexpectedly, the Archaeological Clerk of Works should be informed

The Council would like clarity on the statement in Section 4.8.11, which states “*Activities such as surveys, archaeological investigation, ground investigation, construction of bellmouths and access tracks could commence without the full construction compounds in place*”. Archaeological interventions undertaken during the construction phase will only be possible following the production of an Archaeological Mitigation Strategy and Archaeological Management Plan. Please be advised that ‘archaeological monitoring and recording during construction’ would cause considerable open-ended pauses to the work programme while work stops and the archaeology is dealt with in a manner proportionate to its extent and significance at each point that archaeologically sensitive areas are hit throughout the work programme.

It is essential that assessments and project components are not made in isolation. Many elements required to ensure the scheme runs smoothly, such as the drainage (Section 4.8.16) culverts (Section 4.8.19) or foundations for the temporary crane bridges (Section 4.8.20) may have archaeological implications and therefore need to be assessed. Where archaeological mitigation in the form of a watching brief during construction is proposed, this is highly risky and can have considerable impacts on budget and timetables if significant archaeology is encountered.

Removal of construction equipment, reinstatement and restoration (Section 4.8.39) may also have archaeological impact and these should be scoped into the ES.

Where interlocking mats and/or other types of ground protection structures are proposed (Section 4.9.6), a decision on potential archaeological intervention would be based on impact, any topsoil strip and potential for compaction of underlying deposits, the latter potentially necessitating soil remediation. Encouragement is given to the use of no-dig solutions to avoid harm to archaeological deposits, where identified by prior surveys.

Archaeology should not be scoped out of the decommissioning phase. As stated within the Scoping Report, the regulatory framework, working practices and baseline are likely to have altered by the time of decommissioning (Section 4.10.3) and consequently the type and scale of impact will be unknown and therefore archaeology should be included in any decommissioning plan or there should be a commitment to appropriately consider archaeological harm during this end stage.

Where the Scoping Report discusses types of mitigation, the bulk of archaeological mitigation requirements should have been identified and included within the design stage/embedded mitigation measures (Section 5.3.18). This is stipulated in EIA Regulations which state that ‘*The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed*

development on the following factors...(d)material assets, cultural heritage and the landscape.’⁵

Historic England Advice Note 17: Planning and Archaeology states that ‘*Appropriate evaluation can support the smooth and speedy progression of the development and help to manage the developer’s risk early in the planning process*’ (section 131)⁶. It also states that ‘*Data gathered can also help to inform a costed mitigation strategy, the benefits of which include a reduction in the chances of unexpected risks and associated costs, and potentially the scope to allocate the cost of archaeology appropriately into financial forecasts*’ (ibid, Section 132).

The Chartered Institute for Archaeologists Standard and guidance for archaeological advice by historic environment services stipulates that ‘*Advisors should only make a recommendation in response to a development proposal where the significance of assets affected by the development proposal and the scale of any loss of significance is adequately understood. Where there is insufficient evidence, advisors should recommend that further information be gathered prior to determination of the proposal. Requirements for the gathering of further information should always be focused on informing decision making.*’. Limited survey data can impact the appropriate formulation of an effective mitigation strategy, project timescales and lead to unnecessary and avoidable costs.

Further mitigation measures, including control and management measures (Section 5.3.20) and additional mitigation measures (Section 5.3.23) will be covered by the Archaeological Mitigation and Archaeological Management Plans, overseen by an Archaeological Clerk of Works, and a Public Archaeology and Community Engagement Strategy. LCC will look to secure these through an appropriately worded DCO Requirement, agreed in advance with the Applicant.

Where the SR sets out the methodology for assessing significance and impact within the ES (Section 5.4), this needs to be evidence-based from the results of the archaeological fieldwork, not generic assessments of significance and impact.

The initial pre-screening assessment of interaction between topics should include cultural heritage and the local communities (Section 5.5.18 and Table 5.4). Heritage and archaeology are important assets to local communities and opportunities to enhance heritage assets, improve local understanding and perception of both the historic environment and the project are key considerations.

Whilst not part of an ES, the project should include a Public Archaeology and Community Engagement Strategy to set out how the scheme will benefit the historic environment and engage with the local communities to enhance their heritage.

⁵ The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, SI 2017 No. 572 [The Infrastructure Planning \(Environmental Impact Assessment\) Regulations 2017](#)

⁶ Historic England, Planning and Archaeology, Historic England Advice note 17. [HEAN 17 Planning and Archaeology](#)

Where BNG and other ecological enhancement is proposed, their impacts on archaeological remains needs to be considered (Sections 8.7.7 and 8.7.8, oCoCP Table 4A.3 LV05 and B03). Ecological works should be reviewed by the Archaeological Clerk of Works. Landscaping and ecological mitigation work may have an archaeological impact, for example wildlife ponds and scrapes and tree planting, as well as ground preparation for various types of habitat creation. Trenching will need to take place across the impact zone as development impacts from all groundworks and plant movement whether for infrastructure, construction, BNG or mitigation areas may damage or destroy surviving archaeology.

LCC note that design measures will avoid physical impacts to designated assets (Section 9.6.1). Buried archaeological remains of national significance need to be scoped into this list. These assets are of significance equivalent to Scheduled Monuments and any harm should be designed out.

Furthermore, physical impacts to non-designated heritage assets should also be avoided through mitigation by design, rather than relegated to archaeological excavation and recording or monitoring (Section 9.6.4) as per EN-3 which stipulates that *'The results of pre-determination archaeological evaluation inform the design of the scheme and related archaeological planning conditions.'*⁷

Within the Control and Management Measures, the Council expect to see an Archaeological Mitigation Strategy, of which the outline Written Scheme of Investigation will form a part, an Archaeological Management Plan and an Archaeological Clerk of Works. These should be included under GG07 within the Control and Management Measures and be secured under the DCO Requirement.

The Council would point out that much of the Lincolnshire portion of the route has no strong evidence base (Section 9.7.4). There has been little systematic archaeological survey or investigations for much of the land here and therefore any conclusions drawn from desk-based sources should bare this in mind.

The sources of construction impacts are limited and likely do not reflect the whole range of activities which may have an impact on archaeological remains. It is essential that for management plans in general, consideration of impacts to archaeology should be included within the other topic-specific management plans. LCC has seen in other NSIP submissions a lack of interoperability in the assessment and understanding of the impacts, for example the heritage or archaeology chapter does not include reference to the impacts of proposed ecological mitigation measures or drainage strategies which would have extensive ground impacts to the archaeological horizon. The Council would therefore strongly encourage an integrated approach to undertaking assessments informed by an understanding of the range of impacts which would result from the Western Marsh to East Leicestershire project, and that documents such as the topic-specific management plans inform the assessment

⁷ Department for Energy Security & Net Zero, National Policy Statement for Renewable Energy Infrastructure (EN-3), November 2023, [National Policy Statement for renewable energy infrastructure \(EN-3\)](#)

chapters including cultural heritage. Furthermore, mitigation actions listed within the control and management measures in the oCoCP, such as on-site ditches and silt traps (Table 4A.3 GG17), sediment traps (GG18) or stripping of topsoil for temporary work pads (GG25) have potential to impact buried archaeology.

As covered previously in this response and the Council's earlier non-statutory consultation response, a full list of required data sources is contained within the Lincolnshire Archaeology Handbook. These should be added to the list set out in Section 9.8.7.

Trial trenching is required in advance of the completion of the ES and to inform design. This is best practice and is required for all major infrastructure projects in Lincolnshire (Section 9.8.9).

There is no mention within the Archaeology and Heritage chapter regarding public engagement and enhancement. For a scheme this size, LCC would anticipate considerable opportunities to be available for enhancement of the historic environment, in addition to public engagement. The Council would expect an outline Public Archaeology and Community Engagement Strategy (PACES) to be produced in advance of the DCO submission and for the final PACES to be agreed as part of the consent, if granted. Consideration of enhancement of the historic environment is invaluable in balancing the impacts of any development proposal and interest in archaeology, particularly any remains which have been found locally, can be massive and, if done well, can have the potential to foster high amounts of positive publicity. It can increase both physical and mental well-being and offset elements of a development which may be poorly perceived or have a visibly negative impact on surrounding communities and its value has recently been reported on for Lincolnshire.⁸

The outline Code of Construction Practice (oCoCP) states that it will be updated to include new measures identified during the EIA process, design and stakeholders (Appendix Section 4A.2.2). This should be updated to include the results of the archaeological surveys, including geophysical survey, aerial photography and LiDAR assessment and trial trenching.

It would be useful to understand how the various stages of archaeological works fit into the stages of the CoCP (Section 4A.3).

LCC would advise that archaeological contractors and geophysical survey contractors are involved in the key project deliverables (Section 4A.5.1). It will prevent unrealistic or unachievable deadlines being set and better facilitate the inclusion of heritage surveys into the programme.

It is noted that the key roles and responsibilities has omitted the Archaeological Clerk of Works role (Table 4A.1). This should be rectified. The technical specialist archaeological advisor would sit alongside this Clerk of Works role.

⁸ Lincolnshire County Council, The Value of Heritage and the Historic Environment in Lincolnshire, February 2025, [valuesofheritagereport2025.pdf](#)

The oWSI would sit under the Archaeological Mitigation Strategy and Archaeological Management Plan (Table 4A.2). Table 4A.3 GG07 should be updated to reflect this as well. Table 4A.3 GG12 should include avoidance of sensitive archaeological remains.

Table 4A.3 H01 should be updated to include the Archaeological Mitigation Strategy, Archaeological Management Plan and Archaeological Clerk of Works. These should also be added to the CEMP.

Archaeological considerations should be built into the Soil Management Plan to ensure no activities will occur that have the potential for harm to archaeological remains without appropriate consideration.

Where bones are found during construction (Table 4A.3 AS06), the Archaeological Clerk of Works should be notified and the remains protected until an assessment of their potential archaeological significance has been made.

The Heritage Survey Strategy (Appendix 9B) should be updated to include the embedded mitigation through design (Section 9B.2) and the requirement for Archaeological Mitigation Strategy, Archaeological Management Plan and Archaeological Clerk of Works (Section 9B.2.3). The Year 1 walkover survey should be of the whole route, not just areas accessible from Public Right of Ways (Section 9B.3.1 and Table 9B.1 Heritage Survey Strategy).

Trial trenching should be avoided during the winter months in Lincolnshire (Table 9B.1 Heritage Survey Strategy). Site conditions are such that archaeological remains will be missed, trenches will flood, soils will be damaged, leading to a substandard set of results which cannot be relied on for assessing potential or significance or for producing a fit for purpose Archaeological Mitigation Strategy. Trenching should always be undertaken between April and October. Trial trenching is also required to inform the design.

The Council welcomes that trial trenching will target 'blank' areas from the geophysical survey and areas of known archaeological potential. This is standard good practice.

The Historic Environment team of the Council remain keen to work with the Applicant going forwards in establishing an effective approach to understanding, managing and mitigating the archaeological risk that will occur and maximising the public benefit that will be gained from the archaeological work.

Historic buildings and landscape

The preliminary alignment passes through landscapes where the contribution of setting and long-distance views is central to significance—particularly across the open fenland and the limestone uplands. In these locations, even small additions to the skyline, including further overhead lines, have the potential to alter how assets are experienced. The ES will therefore need to define visibility-led study areas using ZTV and ZoI outputs and assess the combined effects of the proposed line with the existing 400 kV corridor, rather than treating these elements in isolation. Early engagement on this approach would help avoid delays or further requests later in the process.

The SR does not identify the group value or interrelationships of certain heritage asset types, yet this has been a recurring issue in other NSIP schemes in Lincolnshire. In those cases, the Council has emphasised the need to consider how related assets—such as farmsteads or moated sites—derive significance from their collective form, function and spatial relationships. Several heritage receptors along the WMEL route derive significance in this way and LCC would ask the ES to consider this explicitly, particularly for dispersed and nucleated farmsteads in the fenland and upland landscapes, the moated-site network and the fenland drainage landscape system. Early engagement on the methodology for these assessments would be helpful to avoid unnecessary delays or further requests at the Examination stage.

Converter / Substation Siting (WMEL-A)

The emerging location west of Corby Glen sits within a transitional landscape with limited natural screening. The ES should demonstrate how siting has responded to topography and woodland structure and assess effects on Corby Glen Conservation Area and nearby listed buildings, as identified in Appendix 9A. Asset-specific ZTVs and representative viewpoints will be required to establish how the substation may be perceived from elevated limestone areas and from within the village. Early agreement with LCC on the location of viewpoints would be advantageous to avoid unnecessary requests for additional viewpoints later in the process.

Heritage Sensitivities Along the Lincolnshire Route Sections

Section 1 – Weston Marsh to South Forty Foot Drain

Key issues include:

- extensive visibility across the open fen landscape
- proximity to scheduled monastic granges and moated sites, including Newhall Grange, Rigbolt House and Wykeham Chapel, all within 1 km (some 100 m) of the Scoping Boundary
- Pinchbeck Conservation Area and its associated cluster of listed buildings
- the legibility of dispersed historic farmsteads and drainage-related heritage forming the fenland landscape.

Section 2 – South Forty Foot Drain to Irnham

This is one of the most heritage-sensitive parts of the route. Matters for the ES include:

- Grimsthorpe Castle (Grade I) and the Registered Park and Garden, which lie within 100m of the Scoping Boundary in places
- several scheduled medieval settlements, moated sites and the Knights Templar preceptory
- conservation areas at Corby Glen, Dunsby, Irnham and Burton-le-Coggles;

- limestone villages and historic farmsteads characteristic of the Kesteven Uplands.

Section 3 – Irnham towards the Leicestershire boundary

The ES will need to consider effects on Lincolnshire assets where setting extends across the boundary, including South Witham CA, the preceptory remains and associated medieval landscape features.

ES Methodology

For Lincolnshire, the DBA and ES should include:

- a full HER search and systematic identification of non-designated above-ground assets, including farmsteads, ridge-and-furrow and enclosure boundaries;
- use of the *Greater Lincolnshire Historic Farmsteads Character Statement* and the *Lincolnshire Historic Landscape Characterisation* to inform baseline characterisation;
- clear mapping of historic landscape character areas relevant to significance and setting.

Visibility and Setting

- Asset-specific ZTV and ZOI outputs should define the final study area for each heritage asset.
- In both fenland and upland landscapes, setting effects may extend well beyond 3 km and should not be constrained by fixed distance.

Group Value Assessment (methodological requirement)

The ES should include a structured assessment of group value, recognising that many assets along the route derive significance from their collective historic relationships and their contribution to wider landscape character. This is consistent with approaches adopted in recent regional NSIPs where the coherence of historic farmsteads formed part of the assessment.

Relevant groups along the WMEL route include:

- the chain of monastic granges and moated sites (e.g. Rigbolt House, Newhall Grange, Wykeham Chapel, The Hermitage);
- dispersed and nucleated farmsteads characteristic of the fen-edge and Kesteven Uplands;
- Grimsthorpe Castle, its Registered Park and associated estate villages;
- fenland drainage landscapes, including pumping engines, drains and enclosure forms.

Group value assessment will help establish where setting effects operate across multiple interrelated assets, rather than being confined to individual designations.

Holford Rules and Design Evolution

The ES should demonstrate how the alignment has responded to the Holford Rules, particularly in:

- avoiding skylining on prominent ground;
- reducing wirescape and linear clutter in open fenland;
- using landform and woodland cover to reduce setting effects.

Cumulative Effects

A transparent cumulative methodology will be required to assess combined change with:

- the existing 400 kV OHL corridor;
- other major infrastructure schemes;
- Grimsthorpe RPG and its wider estate landscape;
- fenland drainage landscapes and long-distance views.

Cumulative wirescape should be considered as a specific impact pathway given the existing infrastructure baseline.

In summary, in relation to historic building and landscape, for the ES, the Council would expect clear visibility-led assessment areas, comprehensive identification of non-designated heritage assets, explicit consideration of group value, and a transparent explanation of how design evolution has sought to reduce harm to sensitive heritage sites and historic landscapes. The Council would welcome early engagement on the methodology and assessment approach so that key matters are agreed in advance of the Examination stage.

Water Environment

LCC in its role as Local Lead Flood Authority (LLFA) has reviewed the SR and associated figures. Water Environment, Chapter 10 sets out the standard methodology for assessment. LCC is satisfied that this Chapter and specifically paragraphs 10.8.16 – 10.8.22 adequately address surface water flood risk and the preparation of a Flood Risk Assessment.

The Applicant identifies and acknowledges the requirements for appropriate drainage design within Paragraph 5.8.3 which states *“The FRA will consider flood risk both to and from the Project. It will demonstrate how this risk is intended to be managed in the future, including with the influence of climate change”*. Paragraph 2.2.23 also states *“The FRA will assess the flood risk both to and from the Project and demonstrate how that flood risk will be managed over the Project’s lifetime, including with due regard to climate change”*. LCC agrees with this approach and would expect Flood Risk Assessment to be submitted as part of the DCO supporting documentation.

As the Applicant continues to develop their Flood Risk Assessment and Drainage Strategy, LCC would welcome continuing engagement to ensure the scope of these technical documents address any concerns of the LLFA.

Agriculture and Soils

As a starting point 100% of the land affected by Section 1 (South Holland) of the route, and 29.4% of Section 2 (South Kesteven) of the Route comprise agricultural land in Agricultural Land Classification (ALC_ Grades 1 and 2, and 69.8% of land in Section 2 is in ALC Grade 3. This strongly suggests that the majority of the land affected by the route in Lincolnshire is classified as Best and Most Versatile.

The soils identified along the route are of 12 different soil associations, suggesting that the potential mechanisms for adverse impacts on soils during construction will be several and varied. The potential for damage to and loss of soils during construction and ongoing access for maintenance should be taken into account in the preparation of soil and land management plans informed by detailed soil surveys of all disturbed areas.

The SR rightly considers a future baseline in the context of soils and ALC although it discounts changes in relation to climate change as only being visible over periods of time equivalent to or longer than the 40-year operational life of the Project. Impacts of changing weather patterns which are being experienced in recent years are already impacting on land management practices and business approaches and the proposed development is very likely to add a further variable to the already complex management of highly productive land for food production.

The Report fails to consider activities routinely carried out along the line of the proposed development, such as irrigation. National Grid sets out safety clearances that must be maintained when development is proposed close to its lines. It is recommended that a clearance of 30m is maintained between irrigators and 400kV overhead lines, that is a 60m wide corridor in which irrigation should not be carried out. Given the importance of irrigation in the production of high value crops, such as those produced across South Lincolnshire, it is important that adverse impacts upon agriculture should be considered and, where necessary, mitigated.

Specific comments in relation to the chapters and paragraphs is provided below:

Paragraph 1.9.5 - No consideration is given to the potential for adverse operational impacts on land use that might be associated with the proposed development.

Chapter 3 - Given that the project inevitably crosses Best and Most Versatile (BMV) land, no consideration appears to have been given to limitations in the selection process that may be imposed on the use of that land or their mitigation.

Table 4.1 - Acknowledgement of the very likely presence of BMV land in Sections 1 and 2 would be a useful addition to the Principal Features column and demonstrate an understanding that land use is a principal feature of those Sections.

Paragraph 4.8.46 - The sites of substations (and also the foundations of towers) will be stripped of topsoil. Detailed soil surveys should be used to inform methodologies for

how this resource will be handled and protocols for reuse are required and a commitment given that soil will not be treated as waste (unless contaminated).

Paragraph 4.10 – This paragraph states *“As the regulatory framework, good working practices, and the future baseline are all likely to have altered at the time of decommissioning, it is not possible to assess the probable future effects at the present time. Therefore, decommissioning is scoped out and will not be assessed in the ES.”* LCC considers that some attempt should be made to assess the effects of removals of lines, towers and other infrastructure i.e. the decommissioning should be scoped in.

Table 5.4 provides a useful checklist. However, for agricultural holdings and soils, the Socio-economic chapter simply refers back to the Agriculture and Soils chapter.

5.5.19 – 5.5.29 - Inter-project cumulative effects should also include loss of BMV land which is extensive within the route corridor and in Lincolnshire as a whole.

Table 5.5 and Paragraph 12.4.1- ZoI for environmental topics. Given the large size of farms and short-term tenancy arrangements for land in Lincolnshire, the study area for land holdings affected by the proposed development is likely to extend well beyond the Scoping Boundary and this should therefore be considered.

Table 12.1 – The response to National Farmers Union summary should also confirm appointment of an Agricultural Liaison Officer (ALO).

Paragraphs 12.5.1 – 12.5.2 - Data sources are complete, with the exception of Soils of the Boston and Spalding district and accompanying 1:50,000 scale soil map.⁹ This map is to series level and the accompanying book contains soil profile descriptions and sections on soil management and productivity.

Paragraphs 12.5.22 – 12.5.24 - The future baseline considers climate trends, including greater rainfall intensity and more frequent droughts. The report largely discounts the effects of such changes on soil conditions, land grade and farming practices because it is considered they would only be visible over periods of time equivalent to or longer than the operational life of the project. This fails to take into account shorter term changes in weather patterns and the need to sustainably intensify the use of land for food production. Such trends may require changes in farming practices, such as increased irrigation, to provide resilience in food production.

Paragraph 12.6.3 – the Design and Control Measures need two additional components:

- 1) Appointment of an Agricultural Liaison Officer (ALO), separate from the Environmental CoW; and
- 2) Respecting farms' biosecurity requirements which should be identified by the ALO

⁹ Robson, J. D. (1990). Soils of the Boston and Spalding district. Memoir of the Soil Survey and Land Research Centre. (obtainable from LandIS Publications).

in advance of entry by personnel and machinery.

Paragraph 12.8.1 - It is not simply BMV land that should influence siting of towers (along with archaeology, visual impacts etc.). The landowner should be consulted to identify whether it is possible to site a tower within a field in order to reduce the impact on farming operations.

Table 12.12 - The footnote to this table refers to impacts on farming operations, but is dismissive of their possible effects, indicating this topic is likely to be scoped out, although Table 20.7 shows it as scoped in. This pre-judges the outcome of the farm impact assessments, which seem to be associated with soil /ALC surveys, which are not comprehensive under the proposed methodology.

A methodology should be presented in the Scoping Report for conducting farm impact assessments, given that agricultural land is the main receptor. Some farms, such as those with large scale (e.g. centre-pivot and linear move) irrigation systems, may have to undergo significant reorganisation of fields and water supply. It is also noted that the emphasis in this table is on loss of BMV land as the receptor. However, Subgrade 3b land can be more productive for winter-cereal- based rotations than BMV land and so loss of any land can be important to an individual farm.

National Grid guidance¹⁰ on the operation of irrigation equipment near 400kV power lines, such as is proposed here, sets out at Table 1 overhead line conductor clearances. The minimum clearance required to irrigators of any description is 30m, that is a 60m wide corridor. Over the 11km run of Section 1, the exclusion of irrigation would be likely to have an impact on the use of in the region of 66ha of agricultural land, all of which is likely to benefit from irrigation.

Over the 28km run of Section 2, and assuming that 30% of the land traversed benefits from irrigation, the operation of the overhead line would be likely to have an impact on the use of in the region of 50ha of agricultural land.

Over much of the affected agricultural land, groundwater control is achieved by deep ditches and in-field pipe drainage systems. This drainage maintains the workability of the land and manages water levels to safeguard agricultural productivity. Land along the line of the proposed development is generally highly productive but cannot be productively farmed without the benefit of good drainage. Therefore, the impact on agricultural drainage should be scoped into the assessment.

Table 12.15 - The description of 'Very High' receptor sensitivity should be amended to read 'Access between land and key agricultural infrastructure is required on a frequent basis **during the growing and harvesting seasons** (daily).

¹⁰ Electricity transmission emergencies and safety advice, [Electricity transmission emergencies and safety advice | National Grid](#)

Table 12.17 - *Magnitude of impact on agricultural land holdings* is lifted from DMRB LA 112 Population and human health and contains unnecessary references to housing community land etc. It needs editing or perhaps replaced with a more focused table such as that in Chapter 6 of HS2's Scope and Methodology Report.¹¹

Paragraph 12.9.4 - The forthcoming ALC map is *Predictive*, not *Provisional*.

Table 20.7 - With the exception of lack of any assessment of the impacts on agricultural land drainage and of loss of irrigation on land affected by the proposed development, the Council considers this section is complete and generally provides a better description of impacts on farm holdings than within Chapter 12.

12A. - The strategy addresses soil surveys that will be required for the EIA. There is no similar protocol for the carrying out and interpretation of the findings of the farm impact assessments that are also required to support the EIA. This is a serious omission, given the likely impacts on farm holdings outlined in Table 20.7.

Paragraphs 4.8.1 - 4.8.44 - Sections on stripping of soil, access tracks etc. and commitments for reinstatement for compounds, overhead lines, reconductoring and cable installation are considered standard and satisfactory by the Council.

Paragraphs 4.9.1 - 4.9.11 - Inspection and maintenance during Operation would be along routes agreed with the landowner and may require temporary or permanent trackways. This is adequately covered in these paragraphs.

Paragraphs 12.5.3 – 12.5.21 - The Baseline material for Sections 1 to 5 is comprehensive and well presented.

Traffic and Transport

Whilst LCC is broadly in agreement with the scope of Chapter 13, the following comments below are made in relation to the cumulative assessment methodology proposed in paragraph 13.5.108.

LCC notes that cumulative effects are described within chapter 5 (EIA scope and methodology). However, the approach to Temporal Scope (paragraph 5.5.26) is not accepted as an appropriate means of defining the reasonable worst-case scenario. Other developments are not tied to fixed construction timetables within their own assessments and may experience delays or be brought forward. The reasonable worst case for traffic impacts would occur if other NSIP developments construction periods overlapped with the WMEL projects construction period. This scenario and appropriate means of mitigation will therefore need to be assessed as part of the cumulative impact work.

¹¹High Speed Rail (West Midlands – Crewe) Environmental Statement, Volume 5: Technical appendices, Environmental Impact Assessment Scope and Methodology Report (CT-001-001), [Electricity transmission emergencies and safety advice](#) | National Grid

LCC also notes that Table 5.5 suggests that the Scoping Boundary (Figure 1.2) is the limit for the assessment of Traffic and Transport. This is not considered acceptable, as the scoping boundary closely follows the alignment of the project, but traffic will be using roads outside of this boundary to access this corridor. Consequently, there may be junctions outside of the Scoping Boundary which are required to be assessed.

Finally, LCC acknowledges the standard requirements for a Transport Assessment (TA) set out in paragraph 13.8.46. The Council would welcome ongoing engagement with the Applicant during the preparation of the TA to ensure that all relevant matters affecting LCC's highway network are appropriately addressed.

Socioeconomics, Recreation and Tourism

Paragraph 16.3.1 of the Scoping Report is welcome in terms of the commitment to consult with a range of non-statutory consultees in the development of this work. The Council would recommend that this list includes local skills providers, both public and voluntary, and also Community Services. These may include Boston College, Grantham College and Stamford College all within Lincolnshire.

LCC would like to discuss with NGET the potential for local communities (incl. Lincolnshire) to benefit from this development in terms of local energy supply (paragraph 16.3). The Study Area (c.16.4) is evidenced to have a significant shortage of energy supply, restricting existing and potential businesses from achieving their potential growth, and limiting and impacting on the decarbonisation of these businesses. Whilst the Council understand that this development will not impact the local distribution electricity network, LCC expect the ES to detail how mitigation from the negative impacts felt by the business and residential community will include benefit in the power that these communities receive. This is a local and strategic priority. LCC are happy to have further conversations with NGET about Community Benefit Agreements that can support delivery of this mitigation. Alternatively, the Council would be willing to discuss the securing of local skills and employment plans via a S106 agreement, especially for skills improvements at local colleges by funded courses.

Employment Generation

LCC are concerned that Table 16.5 and Image 16.4 do not show the differences between the local authority areas that the project will be located in. It is likely that there will be notable differences in economic activity and qualification attainment levels between the different authority areas, more detailed data would identify those areas most likely to have skills gaps and where appropriate funding could be best placed.

Should the local workforce/supply chain be encouraged for construction of these sites, the ES should consider how employment be made accessible (in terms of travel) for local people to be able to access employment. LCC would consider mitigating factors to include:

- Funded travel to work schemes

- Engagement and partnership with local transport providers and support for local people to access private transport at reduced cost,

Where the above solutions are not possible (last resort).

The ES should consider an approach that prepares the local labour market for the forthcoming opportunities. This could include:

- Local provider engagement at an early opportunity.
- Sector development support, to allow local supply chain to prepare existing workforce, and build and encourage opportunities to grow the workforce.
- Bespoke activity that encourages our evidenced 'hard to reach' and opportunity potential workforce (over 50's, retired military etc) to access new skills and jobs.

Temporary Workforce

As the Council raised in our response to the Stage 1 consultation, the Applicant has not put forward an estimate of approximate construction employees either at the peak of construction or as an average across the construction stage in. The Applicant should be aware of the potential negative socio-economic effects that could arise from what we expect to be a high number of temporary employees (at least temporarily) residing in Lincolnshire:

- Demographic changes and potentially community cohesion, which could be significant depending on workforce age, gender and location of temporary accommodation.
- Impact on local housing markets, including availability and affordability, particularly if the workforce is located within nearby smaller settlements.
- Impact on Tourist Accommodation by use of tourist beds.
- Social services and infrastructure, an obvious area for consideration is healthcare but perhaps education and other services, again, depending on age, gender and location of temporary accommodation.
- Public health and safety, depending on age, gender and location of temporary accommodation, with potential for anti-social behaviour.

LCC would also like to draw attention to the high potential for cumulative impacts of temporary workforces for other NSIPs within Lincolnshire and neighbouring Norfolk and Cambridgeshire and would like to see these considered in relation to the above points. There is likely to be very high levels of temporary workers that will need accommodation at a similar time. While the Council welcome the fact that the impact of construction on tourist accommodation has been scoped in, it is strongly recommended that both direct and indirect impacts on 'affected communities, community facilities, visitor attractions and businesses' are also scoped in. This will ensure a precautionary approach is taken. Finally, LCC would recommend that the impacts on residential properties are either kept under

review or scoped in, as there are not the details currently available to confidently scope any such impacts out of the assessment.

Tourism

LCC do not dispute the fact that there are no strategic tourist attractions within 5km of the project boundary, however there are other attractions within this study area which include Grimsthorpe Castle and Estate, Easton Walled Gardens and Woolsthorpe Manor. These destinations, while not strategic, are of value to the local area.

Health and Wellbeing

The Council note this Chapter is to be based around the published guidance from the Institute of Sustainability and Environmental Professionals (ISEP), along with Public Health England and Highways England on assessing human health as part of ES. The Council suggests there is a requirement for a full health impact assessment, including a mental health impact assessment. Irrespective, LCC's Public Health team would like to be included in looking at human health impacts for both mitigation and positive health and wellbeing opportunities.

The Council agree with the interrelationship with other Chapters and the health impacts, positive and negative, from these Chapters should be drawn together into Chapter 17:

- Chapter 7 -Visual: which covers effects on residential properties and recreational, tourism and community visual receptors and their impact on human receptors including the ability to enjoy open space and recreational amenities.
- Chapter 11 Geology and Hydrology: which covers contamination sources and potential remediation effects following construction activities.
- Chapter 13 Traffic and Transport: which covers effects on accessibility, active travel, use of Public Rights of Way (PRoW) because of construction traffic.
- Chapter 14 Air Quality: which covers air quality effects following construction activities and traffic and their impact on human receptors.
- Chapter 15 Noise and Vibration: which covers noise and vibration effects following construction activities and traffic and their impact on human receptors.
- Chapter 16 Socio-economics, Recreation and Tourism: which covers impacts on community land and facilities, commercial property and land, and employment creation, as well as effects on recreational, tourism and community receptors including the ability to access open space and recreational amenities

The Study Area comprising the wards in which the Project is located and residential, community and healthcare facilities and open spaces within 500m. of the Scoping Boundary is considered appropriate. Demographic and health profiles within these wards should be looked at and the Chapter written with these in mind in the context of the Project.

Open spaces within the scoping boundary and within 500m of the scoping boundary should be maintained, enhanced, and connected if feasible through the cable corridor.

The Project will have the potential to support the emerging Greater Lincolnshire Nature Recovery Strategy if it goes ahead. Such enhancements could also improve public access to open spaces which is poor in Lincolnshire.

The impacts, receptors and potential for significant effect that are scoped in are appropriate. However, the Council disagree scoping out the effect of Electromagnetic Fields. It is important to assess these, together with the effect of the English Onshore Scheme (underground cabling), infrastructure associated with both that and this Project, and other electricity generating infrastructure that may be approved or proposed in the vicinity.

The mental health effect on residents could be considerable even if individually the exposure limits are below those set by the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines. The impacts in this table are negative ones and the potential for positive enhancements to benefit population health and wellbeing should also be scoped in.

Major accidents and Disasters

Lincolnshire Fire and Rescue (LFR) have reviewed the Scoping Report. It is noted, as the document outlines, that there is currently no published guidance nor national legislation to refer to as best practice guidance.

It is recognised that the proposed sub- station would have associated risks, the Scoping Report does not outline any specific response details or plans. LFR would expect plans to be considered and developed as the proposals develop. LFR would expect and encourage the developer to engage with local emergency services to develop response plans.

Minerals & Waste Safeguarding

The Council as Minerals and Waste Planning Authority for Lincolnshire have reviewed the Scoping Report and have the following comments to make.

The Council notes that as this scheme is linear, it is therefore likely to cross one or more Mineral Safeguarding Areas (MSA's) and based on the information set out in section 4.6.13, LCC welcomes the Applicants intention to produce a standalone Minerals Assessment Report.

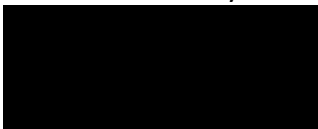
Waste and Materials

In reviewing the waste and materials section of the Scoping Report as the Waste Planning Authority for Lincolnshire, LCC welcome that, in referring to the preparation of a Site Waste Management Plan (SWMP), the Applicant acknowledges the need to comply with relevant elements of the waste hierarchy.

The Applicant proposes to scope out waste and materials from further assessment, stating that this topic “*will not be considered further in the ES*”, on the basis that this approach has been accepted for other similar projects. While waste impacts are unlikely to be significant for this scheme, LCC would have concerns about removing the topic entirely at this early stage unless there is clear precedent for this. The Council are of the view that waste and materials should be scoped as it is more appropriate to ensure an proportionate level of assessment and/or evidence is retained to identify the level of impacts and ensure they are adequately mitigated.

In conclusion whilst the Council maintain strong objection to the proposed development, the Council will continue to engage with the Applicant on the evolving preferred route corridor to ensure that the predicted impacts are mitigated as far as possible which could include significant amendments to the proposed scheme.

Yours faithfully

A solid black rectangular box used to redact the signature of the Head of Planning.

Head of Planning

westonmarshtoeastleics@planninginspectorate.gov.uk

Katie Norris
Planning Inspectorate

05 December 2025

Your Ref: EN0210007
Our Ref: PLN/2025/2431

Dear [REDACTED]

Address: Weston Marsh to East Leicestershire, Weston Marsh

Proposal: Consultation from Planning Inspectorate prior to adoption of Scoping Opinion relating to Environmental Statement (ES) for the Development Consent for the Weston Marsh to East Leicestershire (NSIP)

Thank you for consulting Milton Keynes City Council on the above application.

Milton Keynes City Council has no comments to make on this consultation.

Yours sincerely

[REDACTED]

Senior Planning Officer
Development Management
on behalf of the Head of Planning

Need to contact us?

planning.services@milton-keynes.gov.uk
01908 691691

Civic, 1 Saxon Gate East, Milton Keynes MK9 3EJ
www.milton-keynes.gov.uk



The Coal
Authority

200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

T: 01623 637 119 (Planning Enquiries)

E: planningconsultation@coal.gov.uk

W: www.gov.uk/coalauthority

For the attention of: Wing Sum To – Environmental Advisor

Planning Inspectorate

[By email: westonmarshtoeastleics@planninginspectorate.gov.uk]

Our ref: ENSIP-32

19th November 2025

Dear Madam

Re: Weston Marsh to East Leicestershire - EIA Scoping Consultation

Thank you for your notification of the 7th November 2025 seeking the views of the Coal Authority on the above.

The Coal Authority, now trading as the Mining Remediation Authority, is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

We have reviewed the coal mining data we hold against the areas proposed for the Weston Marsh to East Leicestershire project and can confirm that the route does not lie in areas where our records indicate that coal mining features at surface or shallow depth are present that may pose a risk to surface stability.

It is noted that the Scoping Report submitted states at paragraph 11.6.2 that it will be assumed that the design of the project will incorporate consideration of ground conditions, including instability. As there are no coal mining features recorded in the area defined for the project we have no specific detailed comments to make on the Scoping Report.

If you would like to discuss this matter further please do not hesitate to contact me.

Yours sincerely

[Redacted Signature]

[Redacted Name] BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI

Principal Planning & Development Manager

Disclaimer

The above consultation response is provided by the Coal Authority as a statutory consultee and is based upon the latest available data and the electronic consultation records held by the Coal Authority since 1 April 2013. The comments made are also based on the information provided to the Coal Authority or information that has been published for consultation purposes in relation to this specific project. The views and conclusions contained in this response may be subject to review and amendment by the Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the applicant/developer for consultation purposes.





Defence Infrastructure Organisation

Katie Norris
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Your reference: EN0210007
Our reference: DIO 10067989

Dear Katie,

MOD Safeguarding – RAF Cottesmore

Proposal: Weston Marsh to East Leicestershire

Location: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11.
Application by National Grid Electricity Transmission plc (NGET) (the applicant) for an Order granting Development Consent for the Weston Marsh to East Leicestershire (the proposed development).
Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested.

Grid Ref:	Point 1 Weston Marsh Substation	E 521767, N 327174
	WMEL-A (new substation)	E 497999, N 324663
	Point 4	E 485558, N 320291
	Point 5	E 477469, N 322514
	WMEL-B (new substation)	E 470399, N 322607
	Point 8	E 475863, N 290811
	Point 10	E 485951, N 265956
	Grendon Substation	E 486863, N 261300

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development.

Assistant Safeguarding Manager
Ministry of Defence
Safeguarding Department
St George's House
DIO Headquarters
DMS Whittington
Lichfield
Staffordshire
WS14 9PY

E-mail: DIO-safeguarding-statutory@mod.gov.uk

www.mod.uk/DIO

24 November 2025

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

This application is at the pre-application stage of the Nationally Significant Infrastructure Project (NSIP) process for the “Great Grid Upgrade”. This proposal is to reinforce the high voltage transmission network between Lincolnshire and the East Midlands. And the development includes the construction of a new 400KV line and two new substations as well as the reconductoring of approximately 55km of existing overhead line.

Sections of the proposed route corridors occupy the statutory safeguarding zones surrounding RAF Cottesmore. In particular, the aerodrome height and birdstrike safeguarding zones surrounding the aerodrome and could be between 1.5km and 10km approx. from the centre of the airfield. The illustrations of the preliminary routing corridor show that part of one of the route options could also occupy the statutorily safeguarded technical site known as the East Wide Area Multilateration (WAM) Network.

Birdstrike

Within this zone, the principal concern of the MOD is that the creation of new habitats may attract and support those large and/or flocking bird species that pose a hazard to aviation safety.

There are no safeguarding birdstrike concerns with this proposal.

Aerodromes

The airspace above and around aerodromes is safeguarded to maintain an assured, obstacle free environment for aircraft manoeuvre. This development site sits beneath a piece of protected airspace called the Obstacle Limitation Surface (OLS). The OLS needs to be kept free of obstruction from tall structures to ensure that aircraft transiting to and from or circuiting the aerodrome can do so safely.

At this outline consultation stage, where no details are available for the design or maximum height of the proposed development, MOD representations are limited to the principle of the development only.

To ensure that air safety is maintained at RAF Cottesmore, it will be necessary for the MOD to be consulted at all future stages of this development in order to perform any necessary safeguarding assessments.

Technical

Technical site safeguarding zones serve to protect the effective operation of transmitter/receiver installations used to deliver air traffic navigational service and communications. These safeguarding zones serve to manage the height of new structures, the materials used in their construction as well as potential sources of electromagnetic or electrical noise interference.

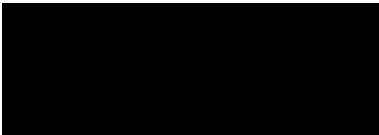
It is appreciated that the detailed route is yet to be determined as is appropriate to the nature of this pre-application submission, and that further work and detail will be completed before any full planning application is submitted.

To ensure that the effective operation of transmitter/receiver installations at RAF Cottesmore and the East WAM is maintained, it will be necessary for the MOD to be consulted at all future stages of this development in order to perform any necessary safeguarding assessments.

The MOD must emphasise that the advice provided within this letter is in response to the data and/or information detailed on the Planning Inspectorate website as of the date of this letter. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely

A large black rectangular redaction box covering the signature area.A small black rectangular redaction box covering the name of the Assistant Safeguarding Manager.

Assistant Safeguarding Manager
DIO Safeguarding

Our Ref: 39354589 National Gas-EN0210007

Friday, 07 November 2025


National Grid House Gallows Hill
Warwick
WAR
CV34 6DA

National Gas Emergency Number:
0800 111 999*

*Available 24 hours, 7 days/week.
Calls may be recorded and monitored.
www.nationalgas.com

Asset Protection
National Gas Transmission
National Grid House
Warwick
CV34 6DA
Email: box.assetprotection@nationalgas.com
Tel: 0800 970 7000

National Gas Transmission – High Risk Response Letter

Dear Sir/ Madam,

An assessment has been carried out with respect to National Gas Transmission plc's apparatus and the proposed work location. Based on the location entered into the system for assessment the area has been found to be within the High Risk zone from National Gas Transmission plc's apparatus and you **MUST NOT PROCEED** without further assessment from Asset Protection.

Before you go ahead with these works, you are required to send your plans and a description for us to review them at box.assetprotection@nationalgas.com. We will contact you within 28 days of receipt.

It is **YOUR** responsibility to take into account whether you are required to or would benefit from referring to the HSE Land Use Planning App (LUP), available from HSE's website. (Please note for some works this is a requirement for them to take place) More information on the LUP is available at <https://www.hse.gov.uk/landuseplanning/>

Please note this response and any attached map(s) are valid for 28 days.

Yours sincerely

Asset Protection Team

Your Responsibilities and Obligations

The "Assessment" Section below outlines the detailed requirements that must be followed when planning or undertaking your activities at this location.

It is your responsibility to ensure that the information you have submitted is accurate and that all relevant documents including links are provided to all persons (either direct labour or contractors) working for you near National Gas Transmission plc's apparatus, e.g. as contained within the Construction (Design and Management) Regulations.

This assessment solely relates to National Gas Transmission plc (NGT)

This assessment does **NOT** include:

- National Gas Transmission's legal interest (easements or wayleaves) in the land which restricts activity in proximity to National Gas Transmission's assets in private land. You must obtain details of any such restrictions from the landowner in the first instance and if in doubt contact Asset Protection.
- Recently installed apparatus.
- Apparatus owned by other organisations, e.g. Cadent, National Grid Electricity Transmission plc, other gas distribution operators, local electricity companies, other utilities, etc.

It is **YOUR** responsibility to take into account whether the items listed above may be present and if they could be affected by your proposed activities.

This communication does not constitute any formal agreement or consent for any proposed development work; either generally or with regard to National Gas Transmission plc easements or wayleaves nor any planning or building regulations applications.

National Gas Transmission plc or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law nor does it supersede the express terms of any related agreements.

If you require further assistance please contact the Asset Protection team via e-mail (box.assetprotection@nationalgas.com) or via the contact details at the top of this response.

Are My Works Affected?

Is your proposal an Information Only or Planned Works Application?

Information Only

As your works are at an "Information Only" stage, any maps and guidance provided are for information purposes only. This is not approval to commence work. You must submit a "Planned Works" enquiry at the earliest opportunity and failure to do this may lead to disruption to your plans and works. Asset Protection will endeavour to provide an initial assessment within 28 days of receipt of a Planned Works enquiry and, dependent on the outcome of this, further consultation may be required. In any event, for safety and legal reasons, works must not be carried out until a Planned Works enquiry has been completed and final response received.

Planned Works

Your proposal is in proximity of National Gas Transmission plc's apparatus, as shown on the attached map, which may impact, and possibly prevent, your proposed activities for safety and/or legal reasons.

You must not commence any work until you have sent details to us at box.assetprotection@nationalgas.com and have received a response back confirming that we have no objections to the work taking place. You must read and follow all the guidance provided when planning or undertaking any activities at this location.

We will contact you within 28 working days of you providing us with the details of your work at the email address above. Please email, or call us at 0800 970 7000, if you have not had a response within this time frame.

Assessment

Affected Apparatus

The apparatus that has been identified as being in the vicinity of your proposed works is:

- National Gas Transmission Pipelines and associated equipment

Requirements

National High Pressure Gas Pipelines

BEFORE carrying out any work you must:

- Ensure that no works are undertaken in the vicinity of our gas pipelines and that no heavy plant, machinery or vehicles cross the route of the pipeline until detailed consultation has taken place.
- Carefully read these requirements including the attached guidance documents and maps showing the location of apparatus.
- Contact the landowner and ensure any proposed works in private land do not infringe National Gas Transmission's legal rights (i.e. easements or wayleaves). If the works are in the road or footpath the relevant local authority should be contacted.
- Ensure that all persons, including direct labour and contractors, working for you on or near National Gas Transmission's apparatus follow the requirements of the HSE Guidance Notes HSG47 - 'Avoiding Danger from Underground Services' This guidance can be downloaded free of charge at <http://www.hse.gov.uk>
- In line with the above guidance, verify and establish the actual position of mains, pipes, cables, services and other apparatus on site before any activities are undertaken.

DURING any work you must:

- Ensure that the National Gas Transmission requirements are followed for work in the vicinity of High pressure pipelines including the supervision of the digging of trial holes.
- Comply with all guidance relating to general activities and any specific guidance for each asset type as specified in the Guidance Section below.
- Ensure that access to National Gas Transmission apparatus is maintained at all times.
- Prevent the placing of heavy construction plant, equipment, materials or the passage of heavy vehicles over National Gas Transmission apparatus unless specifically agreed with National Gas Transmission in advance.
- Exercise extreme caution if slab (mass) concrete is encountered during excavation works as this may be protecting or supporting National Gas Transmission apparatus.
- Maintain appropriate clearances between gas apparatus and the position of other buried plant.

GUIDANCE

National Gas Transmission Network data

The Network map for National Gas Transmission assets can be downloaded at the following link in GIS format.

www.nationalgas.com/land-and-assets/network-route-maps

High Pressure Gas Pipelines Guidance:

If working in the vicinity of a high pressure gas pipeline the following document must be followed: 'Specification for Safe Working in the Vicinity of National Gas Transmission High Pressure Gas Pipelines and Associated Installation – Requirements for Third Parties' (SSW22). This can be obtained from: <Link to SSW22 once it has been updated and signed off>

Essential Guidance document:

<https://www.nationalgas.com/sites/gas/files/documents/8589934982-Essential%20Guidance.pdf>

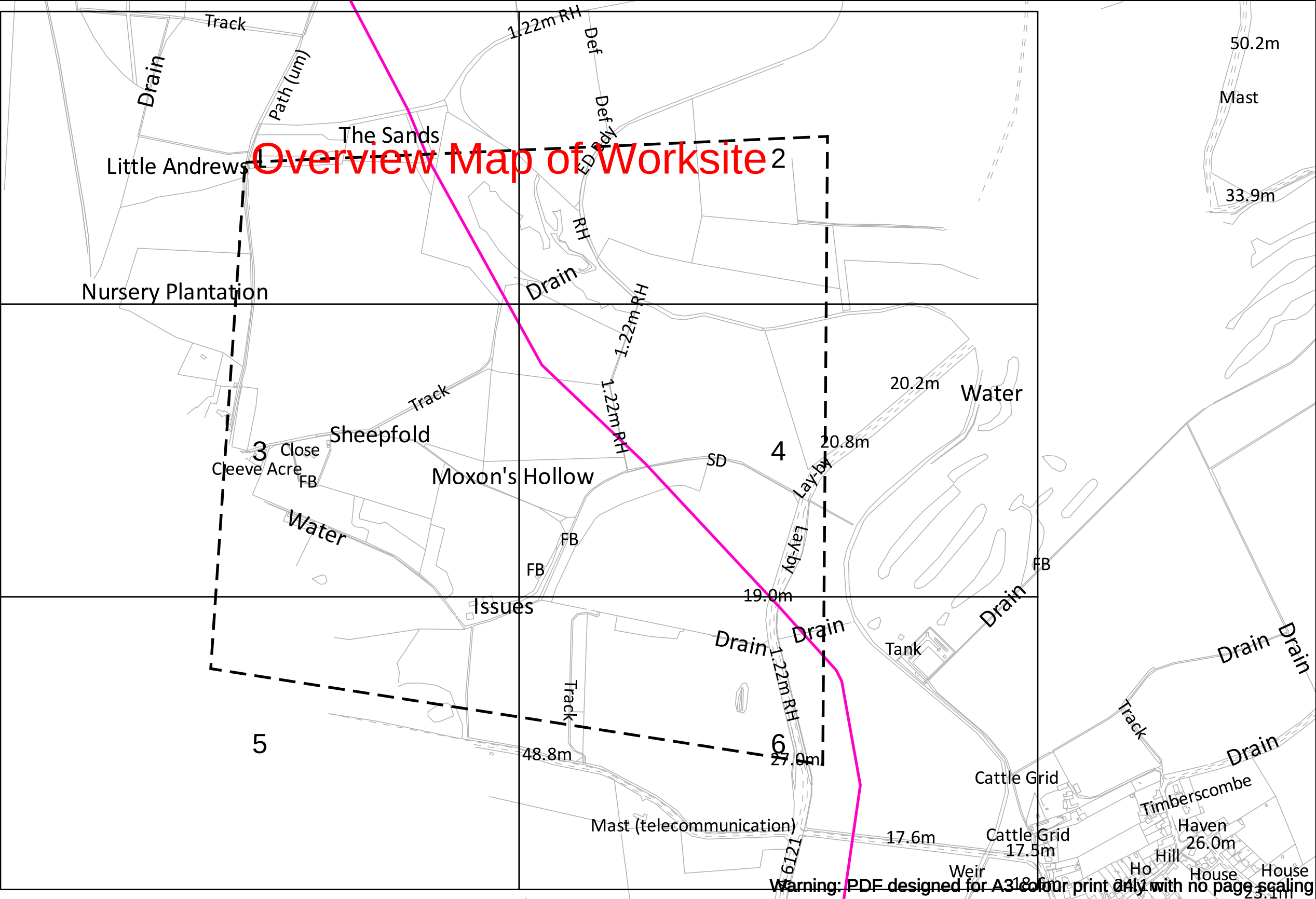
You should be aware of the following information regarding National Gas Transmission's high pressure underground pipelines and associated apparatus:

- Our underground pipelines are protected by permanent agreements with landowners or have been laid in the public highway under our licence. These grant us legal rights that enable us to achieve efficient and reliable operation, maintenance, repair and refurbishment of our gas transmission network. Hence we require that no permanent structures are built over or under pipelines or within the zone specified in the agreement, materials or soil are not stacked or stored on top of the pipeline route and that unrestricted and safe access to any of our pipeline(s) must be maintained at all times.
- The information supplied is given in good faith and only as a guide to the location of our underground pipelines. The accuracy of this information cannot be guaranteed. The physical presence of such pipelines may also be evident from pipeline marker posts. The person(s) responsible for planning, supervising and carrying out work in proximity to our pipeline(s) shall be liable to us, as pipeline(s) owner, as well as to any third party who may be affected in any way by any loss or damage resulting from their failure to locate and avoid any damage to such a pipeline(s).
- The relevant guidance in relation to working safely near to existing underground pipelines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance HS(G)47 "Avoiding Danger From Underground Services" and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Our pipelines are normally buried to a depth of 1.2 metres or more below ground and further information may be found on the plans provided. Ground cover above our pipelines should not be reduced or increased.
- Any proposed cable crossings are subject to approval from National Gas Transmission, completion of a Deed of Consent and must remain a minimum of 600mm above or below the pipeline. All works associated with cable installation must be supervised by National Gas Transmission. Cables cannot be pulled through until a Deed of Consent is in place.
- If it is planned to use mechanical excavators and any other powered mechanical plant, it shall not be sited or moved above the pipeline.
- If it is planned to carry out excavation to a depth greater than 0.3 metres, embankment or dredging works, the actual position and depth of the pipeline must be established on site with our representative

and a safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.

- The digging of trial holes to locate the pipeline must be carried out under the supervision of our on-site representative following approval of RAMS. Excavation works may take place unsupervised no closer than 3 metres from the pipeline once its actual location has been confirmed. Similarly, excavation with handheld power tools may take place no closer than 1.5 metres away.
- For operational and safety reasons National Gas Transmission requires unrestricted access to our Above Ground Installations and Compressor Stations. We would request that any proposed changes to roads/layouts in the vicinity of our site have regard to the need to maintain access.
- Any construction traffic should either cross the pipeline using existing roads or at agreed crossing locations using agreed protective measures.
- Ground anchors for scaffolding stay wires should only be sited in the vicinity of the pipeline after the pipeline position has been confirmed on site with our representative and the ground anchor position agreed.
- If your proposals include the installation of wind turbines then the minimum separation between the pipeline and the nearest turbine should be 1.5 times the mast height.
- If your proposals include the installation of a Solar Farm, all assets must remain outside of the National Gas Transmission easement, all cable crossings must be agreed during the design stage, a Deed of Consent undertaken and an Earthing report must be provided for review. National Gas Transmission must retain access to its assets at all times once works have been completed.

The relocation of existing underground pipelines is not normally feasible on grounds of cost, operation and maintenance and environmental impact. Further details can be found in our specification for: safe working in the vicinity of National Gas Transmission high pressure gas pipelines and associated installations – requirements for third parties: T/SP/SSW/22 (see link above or copy enclosed)



Date Requested: 07/11/2025
Job Reference: 39354589
Site Location: 506483 316199
Requested by: [REDACTED]
Your Scheme/Reference:
National Gas-EN0210007

Scale: 1:7687 (When plotted at A3)

IMPORTANT NOTICES
This plan shows those pipes owned by National Gas Transmission PLC in its role as a licensed Gas Transporter (GT). Gas pipes owned by other GTs, or otherwise privately owned, may be present in this area. Information with regards to such pipes should be obtained from the relevant owners. The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Service pipes, valves, syphons, stub connections, etc., are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by National Gas Transmission PLC or their agents, servants or contractors for any error or omission. Safe digging practices, in accordance with HS(G)47, must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus. The information included on this plan should not be referred to beyond a period of 28 days from the date of issue.

National Gas Transmission Emergency Number: 0800 111 999
Available 24 hours, 7 days/week. Calls may be recorded and monitored

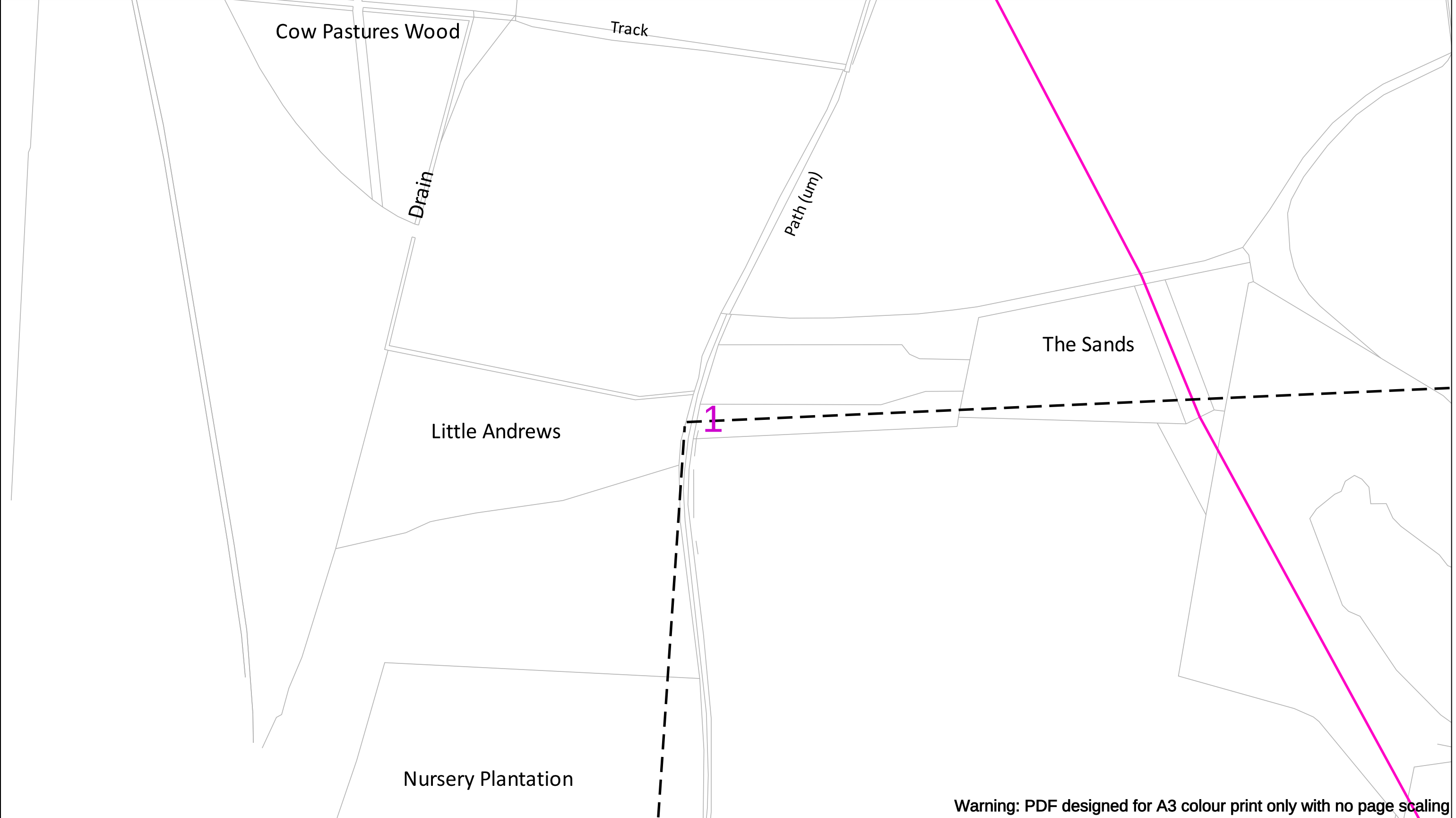
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Dig Sites Area: [---] Line: [---]

[Pink Line] NHP Mains

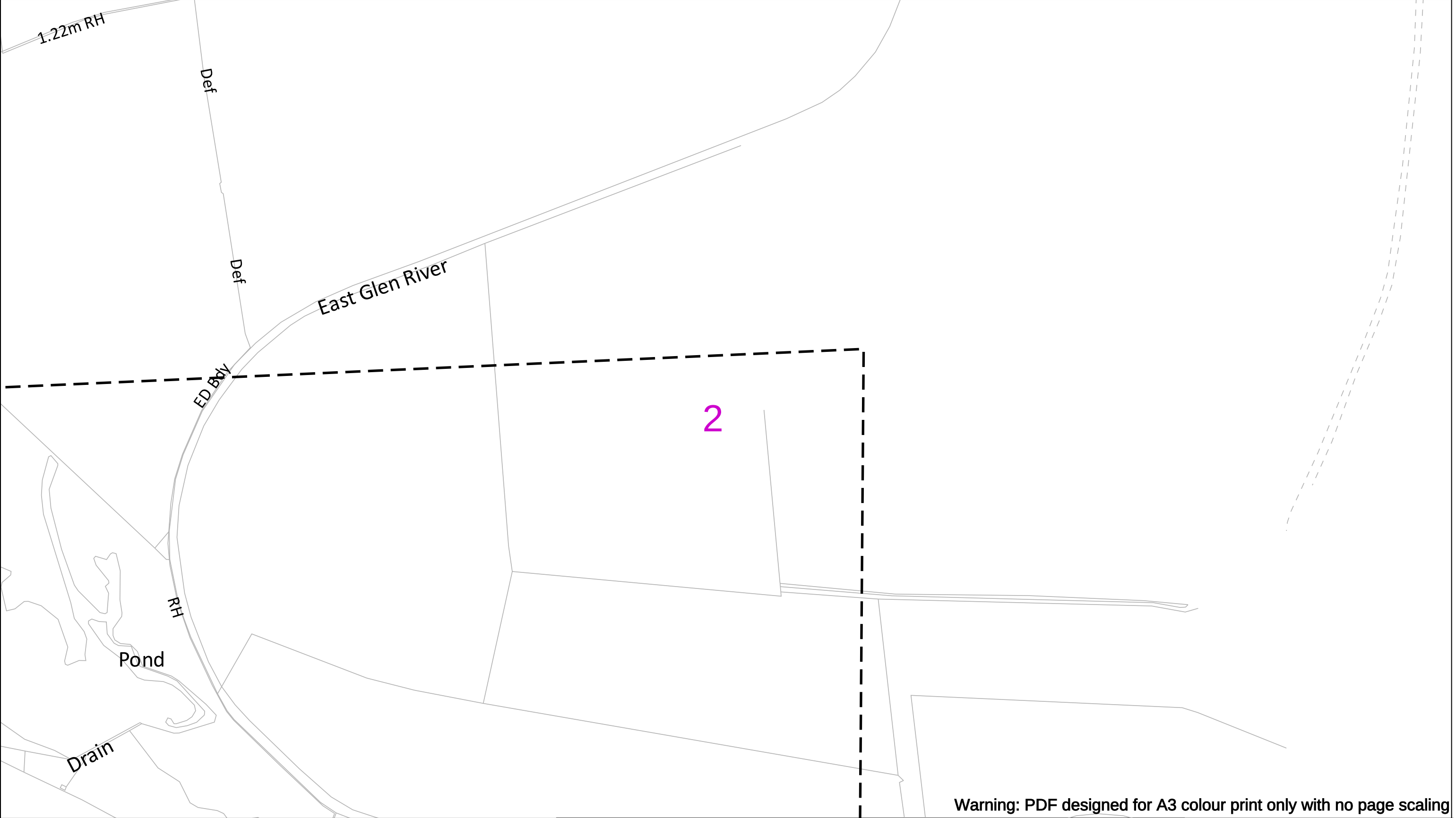


National Gas Transmission
National Grid House
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CV34 6DA
box.assetprotection@nationalgas.com

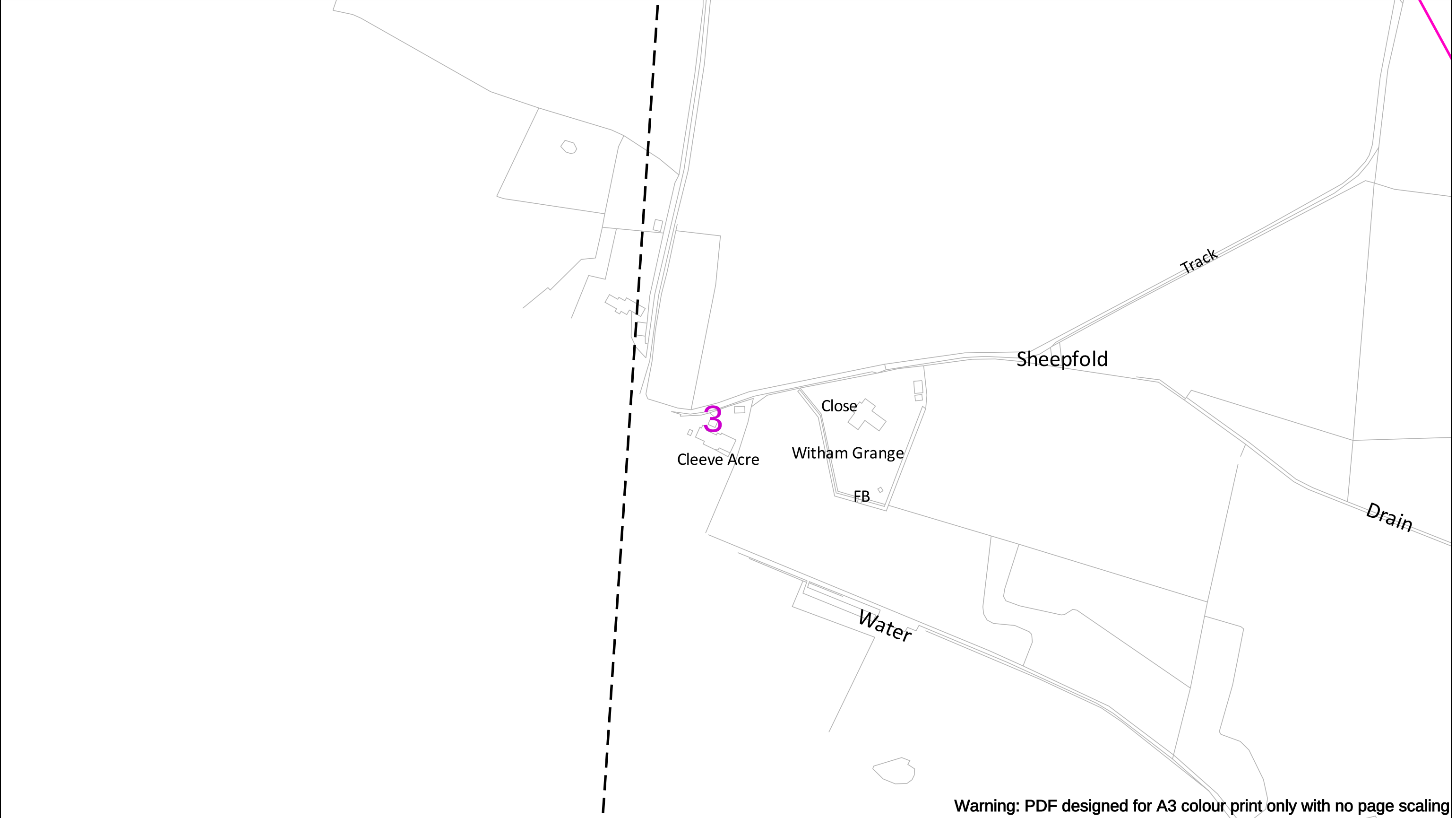


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Date Requested: 07/11/2025 Job Reference: 39354589 Site Location: 506483 316199 Requested by: XXXXXXXXXX Your Scheme/Reference: National Gas-EN0210007 Scale: 1:2500 (When plotted at A3)	IMPORTANT NOTICES This plan shows those pipes owned by National Gas Transmission PLC in its role as a licensed Gas Transporter (GT). Gas pipes owned by other GTs, or otherwise privately owned, may be present in this area. Information with regards to such pipes should be obtained from the relevant owners. The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Service pipes, valves, syphons, stub connections, etc., are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by National Gas Transmission PLC or their agents, servants or contractors for any error or omission. Safe digging practices, in accordance with HS(G)47, must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus. The information included on this plan should not be referred to beyond a period of 28 days from the date of issue.	National Gas Transmission Emergency Number: 0800 111 999 Available 24 hours, 7 days/week. Calls may be recorded and monitored Warning: PDF designed for colour print only with no page scaling 100m Dig Sites Area: Line: NHP Mains	national gas transmission National Gas Transmission National Grid House Warwick Technology Park Gallows Hill Warwick CV34 6DA box.assetprotection@nationalgas.com
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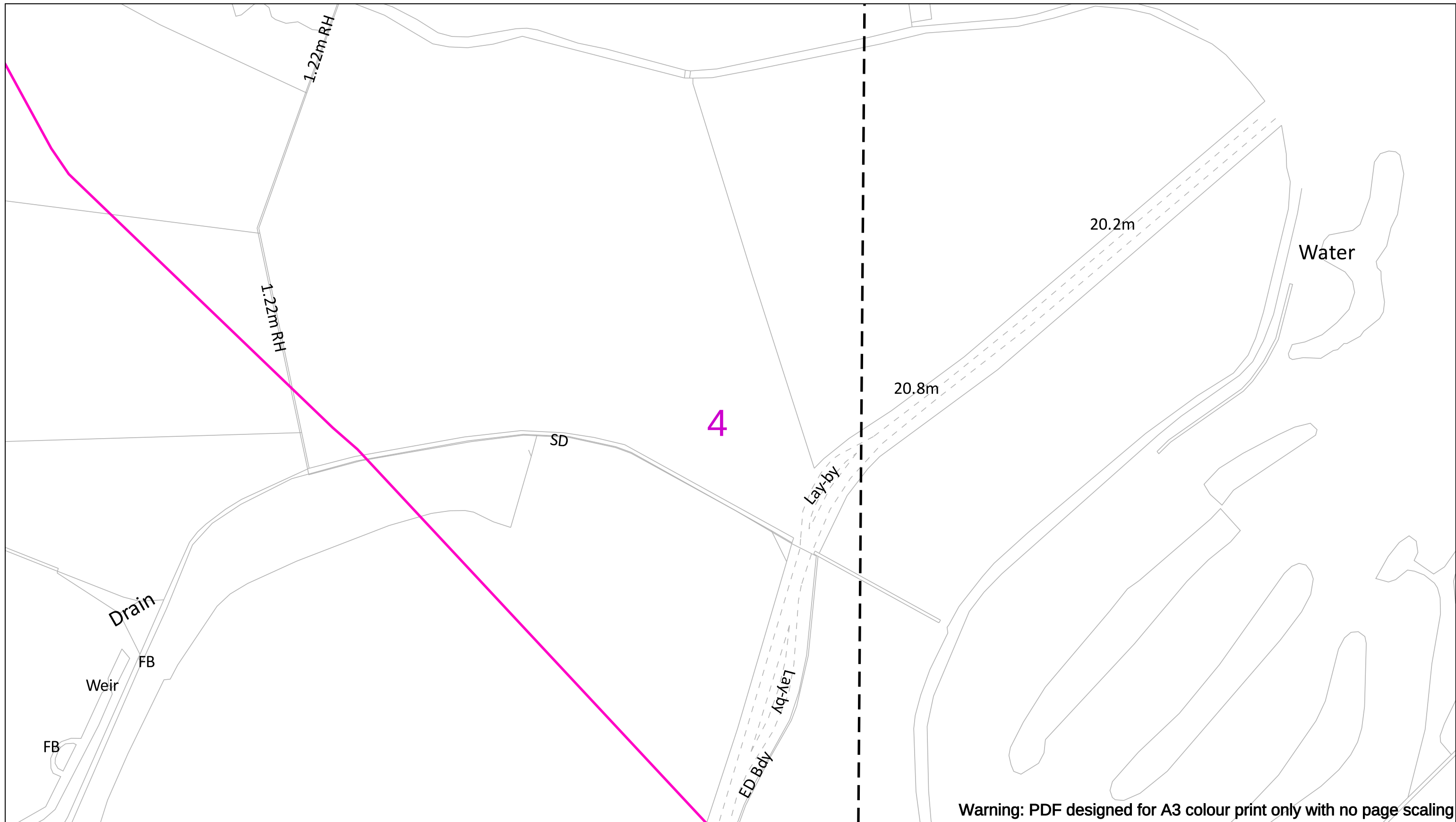
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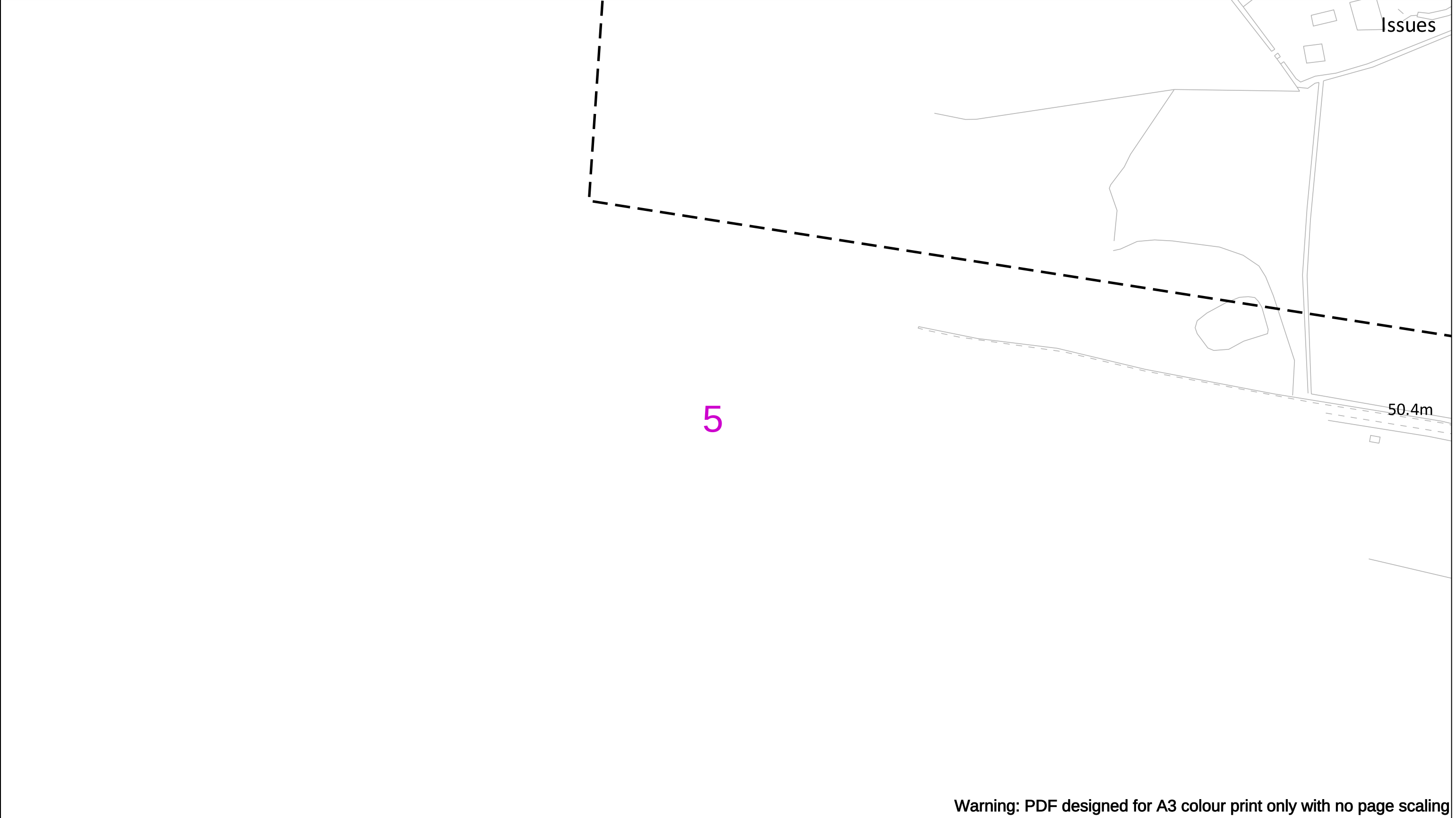
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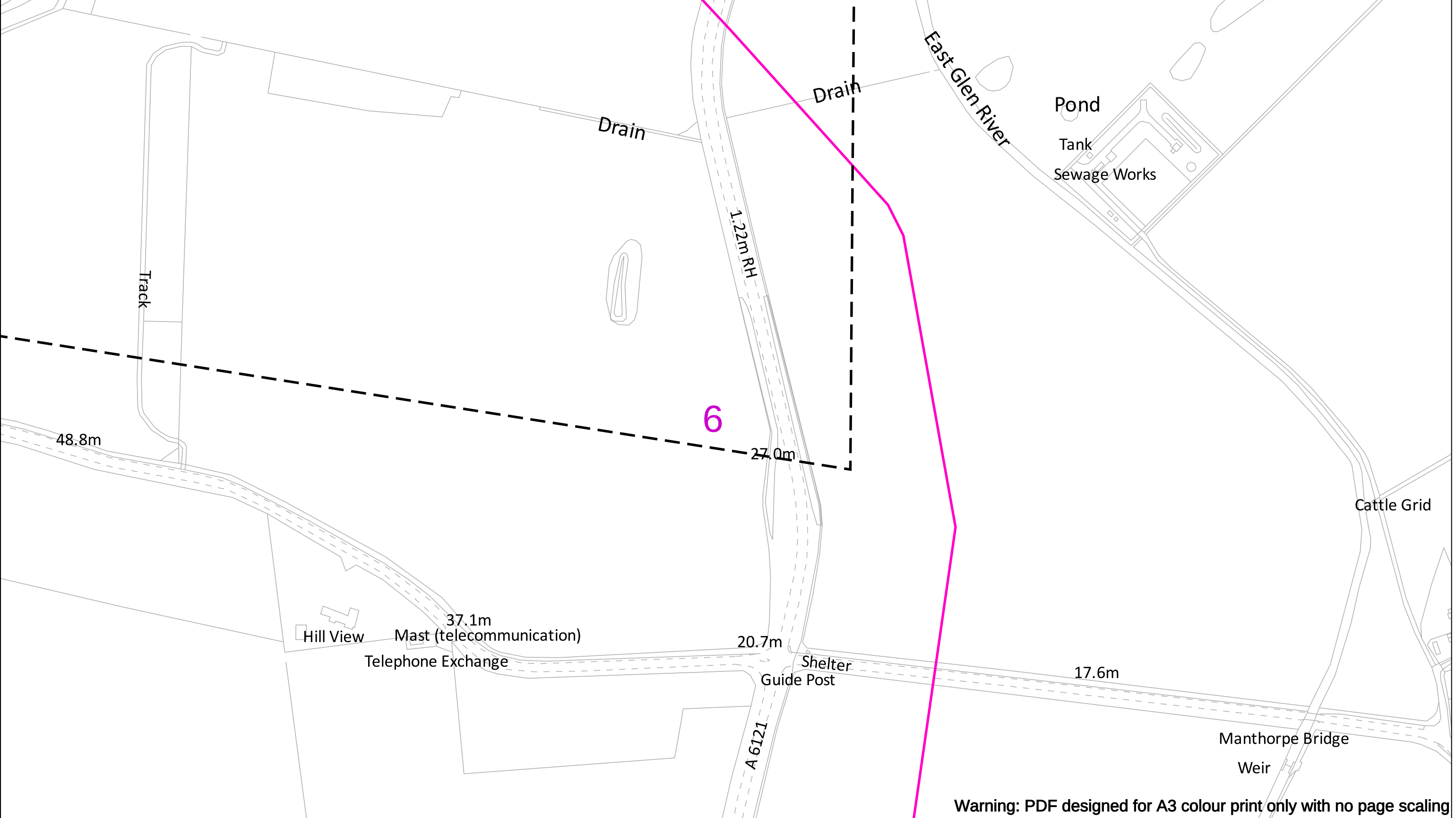
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ENQUIRY SUMMARY

Received Date

07/11/2025 14:50

Work Start Date

08/11/2025

Your Reference

National Gas-EN0210007

Location

Centre Point: 506483 316199

X Extent:

Y Extent:

Postcode: PE100JW

Map Options

Paper Size: A3

Orientation: LANDSCAPE

Scale: 1:2500

Real World Extents: 1208m x 1231m

Enquirer Details

Organisation Name: National Gas Transmission

Contact Name: [REDACTED]

Email Address: [REDACTED]@nationalgas.com

Telephone: [REDACTED] [REDACTED]

Address: National Grid House Gallows Hill, Warwick , WAR, CV34 6DA

Enquiry Type

Planned Works

Activity Type

Planning Applications

Work Types

Commercial/industrial

Notes/Works Description (if supplied)

Application by National Grid Electricity Transmission plc (NGET) (the applicant) for an Order granting Development Consent for the Weston Marsh to East Leicestershire (the proposed development)

Site Contact Name (if supplied)

Wing Sum To

Site Contact Number (if supplied)

[REDACTED]

Submitted via email to: westonmarshtoeastleics@planninginspectorate.gov.uk

Date: 4th December 2025

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by National Grid Electricity Transmission plc (NGET) (the Applicant) for an Order granting Development Consent for the Weston Marsh to East Leicestershire (the Proposed Development)

I refer to your email dated 07/11/2025 regarding the above proposed DCO. This is a response on behalf of National Gas Transmission PLC (NGT). Having reviewed the scoping consultation documents, NGT wishes to make the following comments regarding gas infrastructure which may be affected by proposals.

NGT has many feeder mains located within or in proximity to the Order limits. Details of this infrastructure is as follows:

- Feeder Main – FM09 – Hatton to Peterborough
- Feeder Main – FM22 – Silk Willoughby to Peterborough
- Feeder Main – FM02 – Duddington to Churchover
- Feeder Main – FM04 – Tixover to Blaby
- Cathodic Protection Groundbeds/TR
- Ancillary apparatus

Please note that NGT has existing easements for these pipelines which provides rights for ongoing access and prevents the erection of permanent / temporary buildings/structures, change to existing ground levels or storage of materials etc within the easement strip.

You should also be aware of NGT's guidance for working in proximity to its assets, further guidance and links are available as follows.

CATHODIC PROTECTION SYSTEM

To ensure a high level of safety and reliability in operation, National Gas Transmission's assets are protected by a cathodic protection system. It is essential that buried steel pipework associated with the transmission and distribution of natural gas is designed, installed, commissioned and maintained to withstand the potentially harmful effects of corrosion and that the corrosion control systems employed are monitored to ensure continued effectiveness. Installations in the vicinity of National Gas Transmission's assets which may potentially interfere

with the cathodic protection system must be assessed and approved by National Gas Transmission, and appropriate control measures must be put in place where required.

Installations which have the potential to interfere with National Gas Transmission's Cathodic protection system include (but are not limited to):

1. High voltage cable crossings and parallelism
2. High voltage ac pylon parallelism
3. Battery Energy Storage Systems
4. Third party pipelines with cathodic protection systems
5. PV Solar arrays

Further information on D.C interference can be found in UKOPA/GPG/031 Edition C Microsoft Word - UKOPA GPG 031 DC Interference Ed 1.docx

[Microsoft Word - UKOPA GPG 031 DC Interference Ed 1.docx](#) (hold ctrl and click to access) Further information on A.C. interference can be found in UKOPA/GPG/027 UKOPA Good Practice Guide [UKOPA Good Practice Guide](#) (hold ctrl and click to access)

The safe limits for transfer voltage and impressed current that a high-pressure gas pipeline can be exposed to are outlined in T/PL/ECP/1, T/PL/ECP/2 and BS EN 50122-1. These are the safe limits for non-electrically trained personnel.

Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGT's apparatus, NGT will require appropriate protection and further discussion on the impact to its apparatus and rights including adequate Protective Provisions. A Deed of Consent will also be required for any works proposed within the easement strip.

Key Considerations:

- NGT has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc.
- Please be aware that written permission is required before any works commence within the NGT easement strip. Furthermore a Deed of Consent will be required prior to commencement of works within NGT's easement strip subject to approval by NGT's plant protection team.
- Any large installations which may result in a large population increase in the vicinity of a high pressure gas pipeline must comply with the HSE's Land Use Planning methodology, and the HSE response should be submitted to National Gas Transmission for review.
- The below guidance is not exhaustive and all works in the vicinity of NGT's asset shall be subject to review and approval from NGT's plant protection team in advance of commencement of works on site.

General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and NGT's Dial Before You Dig Specification

for Safe Working in the Vicinity of NGT Assets. There will be additional requirements dictated by NGT's plant protection team.

- NGT will also need to ensure that its pipelines remain accessible during and after completion of the works.
- Our pipelines are normally buried to a depth cover of 1.1 metres, however actual depth and position must be confirmed on site by trial hole investigation under the supervision of a NGT representative. Ground cover above our pipelines should not be reduced or increased.
- If any excavations are planned within 3 metres of NGT High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a NGT representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.
- Below are some examples of work types that have specific restrictions when being undertaken in the vicinity of gas assets therefore consultation with NGT's Plant Protection team is essential:
 - Demolition
 - Blasting
 - Piling and boring
 - Deep mining
 - Surface mineral extraction
 - Landfilling
 - Trenchless Techniques (e.g. HDD, pipe splitting, tunnelling etc.)
 - Wind turbine installation - minimum separation distance of 1.5x the mast/hub height is required, and any auxiliary installations such as cable or track crossings will require a deed of consent.
 - Solar farm installation
 - Tree planting schemes

Traffic Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations.
- Permanent road crossings will require a surface load calculation, and will require a deed of consent.
- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.

- The type of raft shall be agreed with NGT prior to installation.
- No protective measures including the installation of concrete slab protection shall be installed over or near to the NGT pipeline without the prior permission of NGT
- NGT will need to agree the material, the dimensions and method of installation of the proposed protective measure.
- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to NGT.
- An NGT representative shall monitor any works within close proximity to the pipeline to comply with NGT specification T/SP/SSW22

New Asset Crossings:

- New assets (cables/pipelines etc) may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- The separation distance for a cable >33kV is 1000mm and pre and post energisation surveys may be required at National Gas Transmission's discretion. A risk assessment/method statement will need to be provided to, and accepted by National Gas Transmission prior to the deed of consent being agreed. Where a new asset is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.
- A new service should not be laid parallel within an easement strip
- Clearance must be at least 600mm above or below the pipeline
- An NGT representative shall approve and supervise any cable crossing of a pipeline.
- A Deed of Consent is required for any cable crossing the easement

Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGT apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO. NGT requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection.

Adequate access to NGT pipelines must be maintained at all times during construction and post construction to ensure the safe operation of our network.

Yours Faithfully

Asset Protection Team

Further Safety Guidance

To download a copy of the HSE Guidance HS(G)47, please use the following link:

<https://www.hse.gov.uk/pubns/books/hsg47.htm>

Working Near National Gas Assets

<https://www.nationalgas.com/land-and-assets/working-near-our-assets>

Specification for Safe Working in the Vicinity of National Gas High Pressure Pipelines and Associated Installations

<https://www.nationalgas.com/document/82951/download>

Tree Planting Guidance

<https://www.nationalgas.com/document/82976/download>

Excavating Safely

<https://www.nationalgas.com/document/82971/download>

Dial Before You Dig Guidance

<https://www.nationalgas.com/document/128751/download>

Essential Guidance:

<https://www.nationalgas.com/gas-transmission/document/82931/download>

Solar Farm Guidance

<https://www.nationalgas.com/document/82936/download>



Our ref: NH/25/11599
Your ref: EN0210007

██████████
Assistant Spatial Planner
Three Snowhill,
Queensway,
Birmingham,
B4 6GA

Tel: ██████████

02 December 2025

Via email: westonmarsh toeastleics@planninginspectorate.gov.uk

Dear Sir or Madam,

Consultation on EIA Scoping Report for the Great Grid Upgrade from Weston Marsh to East Leicestershire

Thank you for giving National Highways (formerly Highways England) the opportunity to comment on the above-mentioned EIA scoping opinion.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

In responding to sustainable development consultations, we have regard to DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). This sets out how interactions with the Strategic Road Network should be considered in the making of plans and development management considerations. In addition to the Circular, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

As part of this application, our principal interest is the operation of the A1, A14, A45, which all form part of the SRN, and bisects the proposed scoping boundary. There are several other parts of the SRN including the A46 and A52 within the development vicinity.

We have outlined both general and specific matters that we would wish to see considered as part of the EIA.

Development Proposal

The proposed development comprises of reinforcement of the transmission network with a new 400 kV overhead transmission line over a distance of approximately 60 km. The new line starts from new 400 kV substation infrastructure at Weston Marsh to the northeast of Spalding and continues west to a new 400 kV substation proposed to the west of the village of Abkettleby and north west of Melton Mowbray, Leicestershire, via a new 400kV substation proposed to the west of Coby Glen. The Project also includes approximately 66 km of reconductoring of the existing overhead transmission line from WMEL-B substation to the existing Grendon substation, east of Northampton.

National Highways Considerations

General aspects to be considered in all cases include:

- We acknowledge that a Transport Assessment (TA) and a Construction Traffic Management Plan (CTMP) will be prepared in support of the forthcoming planning application, and we look forward to receiving these documents for review.*
- An assessment of transport-related impacts of the proposal should be carried out and reported as described in the Department for Transport's 'Guidance on Transport Assessment (GTA)' and DfT Circular 01/2022. Although the GTA guidance has been archived, it still provides a good practice guide in preparing a TA. In addition, the Department for Levelling Up, Housing, Communities and Local Government also provides guidance on preparing TAs.*
- The environmental impact arising from any disruption during construction, traffic volume, composition or routing change and transport infrastructure modification should be fully assessed and reported.*
- Adverse changes to noise and air quality should be considered, in relation to compliance with the Air Quality Standard Regulations, EU Exit regulations, and/or in local authority designated Air Quality Management Areas (AQMAs).*

Legislation, Planning Policy Context and Guidance

- National Highways' approach to planning is stated in DfT's Circular 01/2022, "Strategic Road Network and the Delivery of Sustainable Development" (the Circular). The approach taken to progressing this development should align with and reference the Circular.*
- Further, the IEMA Guidelines for the Environmental Assessment of Traffic and Movement are used to examine the environmental impacts of the development in terms of traffic and movement.*

Project Specific considerations

Following a review of the EIA Scoping Report, we have set out our comments below.

- A strategic optioneering exercise has been undertaken considering six strategic options, of which the "Weston Marsh to new Market Harborough" option has been identified as the preferred route. The project comprises an overhead line supported on steel lattice towers, with indicative tower heights of approximately*

50 metres. The scheme proposes connections to up to four new 400 kV substations. The new Weston Marsh Substation is expected to accommodate up to two new substations, while the proposed WMEL-A and WMEL-B substations will facilitate connections between the new overhead lines and the existing network. We understand that the exact locations of these substations will be confirmed at subsequent project stages.

- We note from the EIA Scoping Report that the overhead line for Section 2 will cross the A1, and that the overhead line for Section 5 will cross both the A14 and A45. Additionally, the A46 and A52 lie within close proximity of the scoping boundary. The proposed WMEL-A substation is located near to the A1 (approximately 4km away), while the WMEL-B substation is located approximately 6km from the A46.
- Construction of the proposed development is anticipated to commence in 2030 and continue until 2034. The assessment year for the Transport Assessment is currently proposed as 2032, reflecting the assumed peak construction year. We look forward to reviewing the anticipated construction programme as part of the Construction Traffic Management Plan (CTMP).

Transport Considerations

Traffic Forecasting and Impact Analysis

We welcome that a Transport Assessment (TA) will be prepared to assess the transport impacts of the project. We are also satisfied with the proposed contents of the TA presented in the EIA scoping report. We acknowledge that the future baseline will incorporate committed developments and transport schemes alongside background traffic growth. We advise the applicant to engage with all relevant Local Planning Authorities to ensure that all relevant developments and highway schemes with the potential to contribute to cumulative impacts are fully considered.

Operational Phase Assessment

We agree that the operational phase will not result in significant traffic or transport impacts, and therefore the future baseline assessment should focus on construction-related activity.

Future Baseline

We are satisfied with the proposed approach of deriving the future baseline by applying TEMPro growth factors to existing traffic flows. We welcome that committed development trips will also be incorporated. For forecasting traffic on the SRN, we recommend applying the "Trunk Road" growth factors within TEMPro.

Subject to the points above, we are content with the proposed assessment scenarios including; the 2032 Future Baseline ('without development') and the 2032 Future Baseline plus Construction. We acknowledge that the peak construction year may be subject to change once more detailed construction programme information becomes available.

Construction Trip Assignment and CTMP

We note that construction HGV movements will be assigned to designated routes and that construction workforce trips will be distributed across the network using a simple gravity model. We look forward to reviewing the resulting impacts on key SRN junctions within the study area.

We acknowledge that an outline CTMP will be prepared in consultation with all relevant highway authorities, and we look forward to reviewing this in due course.

Mitigation

Subject to the extent of the impact of construction traffic on the SRN, mitigation may be required. National Highways will be able to advise on this matter once the results of scenario testing have been submitted for our review.

Air Quality Considerations

A review of the air quality matters has been undertaken including Figures 1.2 and 14.1, alongside Chapter 4 (Description of the Project) and Chapter 5 (EIA Approach and Methodology) and Appendix 4A (Initial Outline Code of Construction Practice (CoCP)). The scoping chapter includes the expected information for this type of development, including legislation, policy and guidance, consultation and engagement, study area information, baseline data, information on control measures, assessment details, anticipated effects and assumptions and limitations.

The legislation, policy and guidance section does not reference Design Manual for Roads and Bridges (DMRB) air quality guidance. However, appropriate guidance from the Institute of Air Quality Management (IAQM) is referred to for the construction and operational phases.

The consultation and engagement section identifies that only the Forestry Commission has been engaged with to date.

It is identified that no assessment will be undertaken for the operational phase as no significant effects are anticipated. This is reasonable given the nature of the proposed development, with the focus being on the construction phase for air quality.

Importantly the study area sub-section notes that 'Construction routes, site entrances and the location of source activities are not currently defined'. It is requested that all construction routes and site entrances are clearly identified on figures with strategic roads labelled at the next stage of the assessment process. Diversions should also be considered.

The approaches presented for the determination of construction dust and construction traffic are based on IAQM criteria rather than DMRB criteria. These study areas will likely be larger than those that would be determined using DMRB criteria. No change is proposed to incorporate the DMRB criteria.

The baseline sub-section identifies a range of air quality monitoring data sources but does not list National Highways as a potential source of data. Consultation with the NH SES air quality team should be undertaken by the Applicant to determine if any additional air quality monitoring data is available.

The baseline section lists a number of strategic roads as potential sources of air quality pollutants in the anticipated study area. Within the current scoping study area we do not believe there are no identified Air Quality Management Areas.

The Design and Control Measures sub-section identifies that an Initial Outline CoCP has been developed (Appendix 4A) and a selection of air quality specific controls are also presented. The measures in the Appendix are consistent with the types of anticipated pollutant sources for the construction phase. This should be reviewed again at the later stages of the assessment when further information is available on construction activities, locations and when the construction dust assessment has been undertaken. This should be carried out to check that the measures remain appropriate or if further measures and monitoring are needed.

The potential for significant effects sub-section reconfirms the rationale for scoping out the operational phase from the air quality assessment.

The proposed assessment sub-section provides further detail of the construction dust and construction traffic assessment. The text identifies that ADMS-Roads will be used for modelling any routes which exceed traffic screening criteria. The significance of air quality effects will be determined using IAQM criteria and guidance.

The following is recommended for the next stages of the air quality assessment:

- It is requested that all construction routes and site entrances are clearly identified on figures with strategic roads labelled. Diversions should also be considered and identified on figures.
- Consultation with the NH SES air quality team should be undertaken by the Applicant to determine if any additional air quality monitoring data is available.
- The CoCP should be reviewed again at the later stages of the assessment when further information on construction activities and locations is available, and when the construction dust assessment has been undertaken.

Noise Considerations

National Highways are content that the scoping report identifies that there is the potential for significant effects due to changes in road traffic noise due to construction traffic from the development, and that there is a clear methodology for identifying such effects. However, given that the report also identifies there is the potential for significant traffic effects due to road closures/diversions, the impact of these closures/diversions upon road traffic noise levels, including on the SRN, should also be considered as part of the noise scope. The methodology set out in the Design Manual for Roads and Bridges LA 111 Noise and Vibration (LA 111) is considered appropriate for this.

Defra carries out periodic strategic scale mapping of noise levels along major roads. As well as predicted noise levels, Noise Important Areas (NIA) are identified to highlight 'hotspot' locations where the highest 1% of noise levels at residential locations can be found. The most recent road noise mapping was Round 4, based on traffic conditions in 2022. Whilst the noise levels from Round 4 are available, the associated NIA have not yet been published, therefore the latest available road NIAs are from Round 3, based on traffic flows in 2017. A single NIA, ID 7888 located on the A1 close to North Witham, sits within the scoping boundary.

Table 15.2 of the scoping report identifies noise impacts from construction traffic as having the potential for significant effects at noise sensitive receptors close to constructions traffic routes. Paragraphs 15.8.14 to 15.8.19 define the methodology for assessing construction traffic noise impacts, based on the guidance in LA 111.

However, in section 13 of the report (Traffic and Transport), table 13.2 identifies that there is the potential for significant effects as a result of construction traffic and road

closures/diversions. As road closures/diversions can lead to significant traffic noise effects, this should also be included in the noise scope. LA 111 gives a methodology for identifying significant effects due to diversion routes, and notes that “For diversion routes used at night, a major magnitude of impact for construction noise impact shall be determined at any noise sensitive receptors within the diversion route study area [25 m from the kerbline of the diversion route]”.

Visual Considerations

The study area extends to around 3km which is reasonable for the lighting impact assessment. The main receptors considered in terms of lighting effects are residential or ecology receptors primarily impacted during operational stages. Lighting has been identified as a concern under consultation as part of the LVIA for PRow, residential and sensitive land uses, but there isn’t a specific link to the SRN.

Predicted impacts noted against road and rail receptors in the scoping report are set out as likely to have non-significant effects and the report recommends a scope out for them but scope in for ecology. We consider there should be some consideration of lighting impact from construction and operational phases on the SRN to ensure that lighting uses/proposals are adequately managed.

We recommend that this information is input into a Construction Environmental Management Plan (CEMP), or the provision of performance commentary for lighting uses/proposals in relation to non-ecology receptors.

Summary

Please note that these comments imply no pre-determined view of the acceptability of the proposed development in terms of traffic, environmental, or highway considerations. These comments relate specifically to matters arising from National Highways’ responsibilities to manage and maintain the Strategic Road Network (SRN) in England, in line with DfT’s Circular 01/2022 to support sustainable delivery of growth. For comments related to the local road network, please consult the appropriate local highway authority. The Local Planning Authority will determine the final scope of the Environmental Statement.

If I can be of any further assistance on this matter, please do not hesitate in contacting me.

Yours sincerely,



Midlands Operations Directorate

Email: [REDACTED]@nationalhighways.co.uk

From: [REDACTED]@nats.co.uk>

Sent: 11 November 2025 15:25

To: Weston Marsh to East Leicestershire

<westonmarshtoeastleics@planninginspectorate.gov.uk>

Cc: NATS Safeguarding <NATSSafeguarding@nats.co.uk>; Ian.wheaton@nationalgrid.com

Subject: RE: EN0210007 - Weston Marsh to East Leicestershire - EIA Scoping and Consultation and Regulation 11 Notification [SG39595]

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Dear Sirs, we acknowledge receipt of the EIA consultation.

From a preliminary assessment of the planned corridors, there is the potential for the line routing to come in close proximity to NATS's air-ground-air radio installation site at Grantham. NATS has raised this previously with the Applicant's agent and will be happy to liaise with the Applicant in order to identify any potential impact.

Accordingly, NATS has no comments to make on the EIA Scoping Opinion and will be happy to review further information from the Applicant once more details about the exact routing are provided.

Regards

[REDACTED]

NATS Safeguarding Office



NATS

██████████
ATC Systems Safeguarding Engineer

D: ██████████

E: ██████████ [nats.co.uk](mailto:██████████@nats.co.uk)

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL

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NATS Internal

Date: 04 December 2025
Our ref: 532754
Your ref: EN0210007



westonmarsh toeastleics@planninginspectorate.gov.uk

BY EMAIL ONLY

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Dear Sir/ Madam,

Regulations 10 and 11 for order granting Development Consent for the Weston Marsh to East Leicestershire for the National Grid Electricity Transmission Plc - Environmental Statement and the scoping process.

Proposal: Environmental Impact Assessment Scoping Report
Location: Weston Marsh to East Leicestershire

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 07 November 2025, received on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO). Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Detailed advice on scoping the Environmental Statement is available in the attached Annex.

For any further advice on this consultation please contact the case officer [REDACTED] and copy to consultations@naturalengland.org.uk.

Yours sincerely

[REDACTED]
Senior Advisor for Nationally Significant Infrastructure Projects

Annex A – Natural England’s Advice on EIA Scoping

General principles

- a. Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:
- b. A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- c. Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- d. An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- e. A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- f. A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- g. A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- h. A non-technical summary of the information
- i. An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information
- j.
- k. Further guidance is set out in Planning Practice Guidance on [environmental assessment and natural environment](#).

Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local Wildlife Trust, local geo-conservation group or other recording society.

Biodiversity and geodiversity

The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) and an [EclA checklist](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Many public authorities e.g. National Highways and National Grid have biodiversity duties including taking opportunities for habitat restoration or enhancement. They might have Key Performance Indicators (KPIs) to adhere to via Government policy, or have agreed approaches to BNG. Further information around general duties is available [here](#).

Remember to refer to the relevant sector specific information within National Policy Statements [here](#) and our own sector specific guidance on the SD Toolkit.

Designated nature conservation sites

International and European sites

The development site is within or may impact on the following **European/internationally designated nature conservation site(s)**: Upper Nene Valley Gravel Pits SPA and Ramsar, Grimsthorpe SAC, The Wash SPA and Ramsar, Baston Fen SAC, Rutland Water SPA and Ramsar, Nene Washes SPA and Ramsar.

The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA.

Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.

European site conservation objectives are available at <http://publications.naturalengland.org.uk/category/6490068894089216>.

Evidence Plans are a useful mechanism NSIP applicants can use to agree what information should be provided to the Planning Inspectorate and Natural England when undertaking Habitats Regulations Assessment (HRA). Agreeing the evidence-needs of the project early prior to applying for Development Consent will help reduce delays in the process. More information on Evidence Plans is available [here](#).

You should also consider where applicable our advice on the environmental considerations and use of data and evidence to support offshore wind and cable projects in English waters – see: [Environmental considerations for offshore wind and cable projects - Home \(sharepoint.com\)](#). This includes Natural England and Joint Nature Conservation Committee (JNCC)'s shared advice on 'Nature conservation considerations and environmental best practice for subsea cables in English inshore and UK offshore waters'. The outputs of Natural England's project 'Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards' are also provided.

Natural England's Impact Risk Zones incorporate internationally designated sites and features and can be used to help identify the potential for the development to impact on a European Site. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

You can access this information through [NE Maps](#).

Nationally designated sites

Sites of Special Scientific Interest

The development site is within or may impact on the following Site of Special Scientific Interest: Frisby Marsh, Great Bowden Borrowpit, Birch Spinney and Mawsley Marsh, Badsaddle, Withmale Park and Bush Walk Woods, Holwell Mouth, Leighfield Forest, Upper Nene Valley Gravel Pits, Tortoiseshell Wood, The Hermitage, Dunsby Wood, Swinstead Valley, Porter's Lodge Meadows, Hardwick Lodge Meadow, Cribbs Lodge Meadows, Surfleet Lows, Launde Big Wood, Bozeat Meadow, Stoke & Bowd Lane Woods specifically within 2km of the site.

The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI's and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSI and its special interest features can be found at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Regionally and Locally Important Sites

The Environmental Statement should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust,

geoconservation group or other local group. The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. They may also provide opportunities for delivering beneficial environmental outcomes.

Protected species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System](#).

Applicants should check to see if a mitigation licence is required using Natural England guidance on licensing [Natural England wildlife licences](#). Applicants can also make use of Natural England's charged service [Pre Submission Screening Service](#) for a review of a draft wildlife licence application. Natural England then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. See [Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning](#) for details of the LONI process.

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

District Level Licensing for great crested newts

Where strategic approaches such as DLL for GCN are used, a Letter of No Impediment (LONI) will not be required. Instead, the developer will need to provide evidence to the Examining Authority (ExA) on how and where this approach has been used in relation to the proposal, which must include a counter-signed Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England, or a similar approval from an alternative DLL provider.

The DLL approach is underpinned by a strategic area assessment which includes the identification of risk zones, strategic opportunity area maps and a mechanism to ensure adequate compensation is provided regardless of the level of impact. In addition, Natural England (or an alternative DLL provider) will undertake an impact assessment, the outcome of which will be documented in the IACPC (or equivalent).

If no GCN surveys have been undertaken, Natural England's risk zone modelling may be relied upon. During the impact assessment, Natural England will inform the applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN.

The IACPC will also provide additional detail including information on the Proposed Development's impact on GCN and the appropriate compensation required.

By demonstrating that the DLL scheme for GCN will be used, consideration of GCN in the ES can be restricted to cross-referring to the Natural England (or alternative provider) IACPC as a justification as to why significant effects on GCN populations as a result of the Proposed Development would be avoided.

Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The ES should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 180 of the NPPF sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

The Environmental Statement should include details of where impacts might occur from this development proposal on the local ancient woodland and how these can be mitigated.

Information that might require consideration to inform this work includes:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);

Additional surveys carried out as part of this proposal, likely to include detailed habitat and species surveys;

- The habitats and species present;
- The status of these habitats and species (eg whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species; and
- Full details of any mitigation or compensation that might be required.

Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. The wood pasture and parkland inventory sets out information on wood pasture and parkland. The ancient tree inventory provides information on the location of ancient and veteran trees. Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.

Biodiversity and geodiversity

The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG).

We advise this include the emerging Local Nature Recovery Strategy (LNRS) for Hampshire which will be the key mechanism for planning and mapping local delivery of the Nature Recovery Network (NRN). The NRN refers to a single, growing national network of improved joined-up, wildlife rich places which will benefit people and wildlife Local nature recovery strategies GOV.UK (www.gov.uk).

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Landscape and visual impacts

The National Policy Statement for Ports includes requirements for the consideration of landscape impacts.

The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory

management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status. The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage or beyond.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

The National Infrastructure Commission has also produced Design Principles Design Principles for National Infrastructure - NIC endorsed by Government in the National Infrastructure Strategy.

Connecting people with nature

The ES should consider the potential impacts on the Click here to enter text. National Trail. The National Trails website www.nationaltrail.co.uk provides further information.

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 104 and there will be reference in the relevant National Policy Statement. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Soils and agricultural land quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 180 and 181 of the NPPF. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

As set out in paragraph 217 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the

Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development

The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

Air quality

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development
<https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions
<https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

Water quality

NSIPs can occur in areas where strategic solutions are being determined for water pollution issues and they may not have been factored into the local planning system as they are delivered through National Policy Statements.

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels.

From: [REDACTED]@norfolk.gov.uk>

Sent: 11 November 2025 12:55

To: Weston Marsh to East Leicestershire

<westonmarshtoeastleics@planninginspectorate.gov.uk>

Cc: [REDACTED]@lincolnshire.gov.uk>; [REDACTED]

[REDACTED]@norfolk.gov.uk>; [REDACTED]@norfolk.gov.uk>; [REDACTED]

[REDACTED]@norfolk.gov.uk>

Subject: Weston Marsh to East Leicestershire - Scoping Report

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To the Planning Inspectorate

Thank you for consulting Norfolk County Council on the above Scoping Report.

While the project sits outside Norfolk, the County Council does have some cross-boundary observations to make on the applicant's EIA Scoping Report.

The Planning Inspectorate will be aware that there are two other National Grid Project coming forward in the area as part the Great Grid Upgrade comprising:

- (1) Grimsby to Walpole (G2W) Project - [G2W Project](#); and
- (2) East Green Links 3 and 4 (EGL 3 & 4)Project - [EGL 3 & 4 Project](#).

The above National Grid projects need to be considered as part of the cumulative impact assessment of the Weston Marsh – East Leicestershire Project. The EIA/ES will need to consider both the potential cumulative impacts and the wider potential opportunities for coordination between Projects.

The EIA/ES will need to consider whether there is likely to be any in combination impacts on the Norfolk components of the G2W and EGL 3 & 4 projects at Walpole, where currently these projects involve (a) a new 400 kV Substation; (b) two new converter stations; and (c) some other head wiring (400kV); and potential undergrounding works.

The EIA/ES will also need to consider the in combination impacts on:

- (a) The local labour markets across Lincolnshire; Norfolk; and Cambridgeshire taking account not just the planned transmission upgrades by National Grid but other major development in the areas including solar farms; and planned reservoir projects; and

(b) Local supply chains will also need to be considered across the wider area above.

The above matters will ultimately need to be addressed through (1) an Employment and Skills Strategy ; and (2) a Supply Chain Strategy prepared by the applicant as part of the DCO process.

Kind regards

[REDACTED]

[REDACTED] BA(Hons), MSc, DipTP, MRTPI

Principal Planner – National Infrastructure Co-lead

Transformation and Strategy

Tel: 01603 222752



Norfolk County Council



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Norfolk County Council

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From: [REDACTED]@N-KESTEVEN.GOV.UK>

Sent: 11 November 2025 11:57

To: Weston Marsh to East Leicestershire

<westonmarshtoeastleics@planninginspectorate.gov.uk>

Subject: EN0210007 (25/1403/NSIP) - Application by National Grid Electricity Transmission plc (NGET)

You don't often get email from [REDACTED]@n-kesteven.gov.uk. [Learn why this is important](#)

Dear Sir, Madam

Thank you for consulting North Kesteven District Council in relation to the above scoping opinion request.

I can confirm that at this stage we have no comments to make in relation to the applicant's Scoping Report.

Regards

[REDACTED]



[REDACTED]

Development Manager

Tel: [REDACTED]

Email: [REDACTED]@N-KESTEVEN.GOV.UK

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02/12/2025

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North Lincolnshire Council Reference: PA/SCO/2025/8

Planning Inspectorate Reference: EN0210007

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by National Grid Electricity Transmission plc (NGET) (the applicant) for an Order granting Development Consent for the Weston Marsh to East Leicestershire (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Location: A new circa 60 kilometre 400kV overhead electricity transmission line which connects into the Weston Marsh substation infrastructure (to be constructed under the Grimsby to Walpole Project), in the Spalding region of Lincolnshire, and runs west to a new 400kV transmission substation (WMEL-B) near Wartnaby in Leicestershire, via a new 400kV transmission substation (WMEL-A) near Corby Glen in Lincolnshire. The Project also includes reconductoring of approximately 55 kilometres of existing transmission infrastructure from the new WMEL-B substation, running south to the existing Grendon substation, east of Northampton.

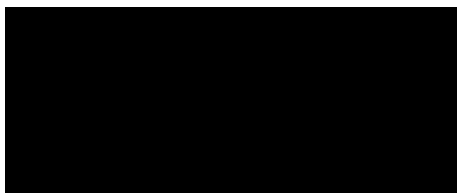
Officer: [REDACTED]

Thank you for your email dated 7th November 2025 giving North Lincolnshire Council (NLC) the opportunity to feedback on the Weston March to East Leicestershire Project Scoping Consultation.

I can confirm that after consultation with our internal technical consultees that North Lincolnshire Council has no comments or objections to raise in respect of this project

with the proposed development not likely to result in any significant impact upon North Lincolnshire.

Kind Regards



Senior Planning Officer
North Lincolnshire Council

From: [REDACTED]@NWLeicestershire.gov.uk>

Sent: 17 November 2025 15:24

To: Weston Marsh to East Leicestershire

<westonmarshtoeastleics@planninginspectorate.gov.uk>

Subject: Application by National Grid Electricity Transmission PLC (NGET) (the applicant) for an Order granting Development Consent for the Weston Marsh to East Leicestershire (the proposed development)

You don't often get email from [REDACTED]@nwleicestershire.gov.uk. [Learn why this is important](#)

Afternoon Katie,

I hope you are well.

First and foremost thank you for consulting North West Leicestershire District Council (NWLDC – the Council) on this proposal. I note that consent for this proposal will be sought through a Development Consent Order (DCO) process.

Predominantly the application relates to a proposal by National Grid (the applicant) to reinforce the transmission network with a new 400 kV overhead transmission line over a distance of approximately 60 km.

The proposed development is around 14.66 miles from the District boundary and consequently in reviewing the documents which are available at [Documents | Weston Marsh to East Leicestershire](#) officers would consider the only real impact to the District would be the potential for the very limited distance glimpsed view to be established from those settlements in the north-eastern part of the District (i.e. Kegworth and Long Whatton). The submitted Scoping Report acknowledges, within the Landscape (no. 6) and Visual (no. 7) chapters, that a Zone of Theoretical Visibility (ZTV) would be established but that significant effects are unlikely to occur at a distance of over 5 kilometres from the application site boundary (which is the case in this instance – 23.59 kilometres).

As Landscape and Visual impacts are to be scoped into the Environmental Statement (ES), the Council would have no comments to make on the scoping request.

Please note that this response has not been formally reported to the Council's Members. In these circumstances the comments made are those of an officer of the Council and would not prejudice any future response by the Council in respect of this proposed development.

I trust that this information is of assistance to you.

Yours faithfully



Principal Planning Officer (Major Projects) | Planning and Development

@nwleicestershire.gov.uk | www.nwleics.gov.uk

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I work for an agile organisation and often work outside of traditional office hours. I don't expect an immediate response to my email – please reply at a convenient time for you.

Any advice provided is offered without prejudice to future decisions made by the Authority.

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[REDACTED]
[REDACTED]
[REDACTED]

Friday 14th November 2025

To: Scoping consultation, Weston Marsh to East Leicestershire (Project Ref: EN0210007)

Email: westonmarshtoeastleics@planninginspectorate.gov.uk

Subject: Response from Podington, Hinwick & Farndish Parish Council – Scoping for ES

Dear Sir/Madam,

On behalf of the Podington, Hinwick & Farndish Parish Council I thank you for the opportunity to comment on the scope of the Environmental Statement (ES) for the proposed development by National Grid Electricity Transmission plc (NGET) for the “Weston Marsh to East Leicestershire” Nationally Significant Infrastructure Project (NSIP).

1. Parish Context

Our parish covers the villages/hamlets of Podington, Hinwick and Farndish, within Bedford Borough, and contains several heritage and environmental features of local and national importance. These include:

Heritage and Conservation Areas

- Podington Conservation Area (designated October 1970).
- Hinwick Conservation Area (Appraisal published 2016).
- Numerous listed buildings and traditional rural settlement patterns.

Key Listed Buildings of High Significance

- Hinwick House (Grade I) – major heritage asset within the parish.
- *Hinwick Hall (Grade II)** – including its historic gardens and outbuildings.
- Church of St Mary, Podington (Grade I) – 13th-century origin.
- Church of St Michael, Farndish (Grade I) – a significant 12th–13th-century medieval church, now in the care of the Churches Conservation Trust, and a prominent heritage landmark within Farndish.
- Numerous Grade II listed farmhouses, cottages, barns, walls and ancillary structures in Podington, Hinwick and Farndish.

Landscape & Ecology

- A predominantly rural landscape of farmland, paddocks, hedgerows, woodland edges, wildlife corridors and ponds.
 - Several public rights of way connecting the three villages.
 - Identified green infrastructure areas in local environmental frameworks.
-

Roads & Traffic Sensitivity

- Narrow rural lanes (notably through Farndish and Hinwick), limited passing areas, and known problems with HGV rat-running.
- Roads not designed for sustained heavy construction-vehicle flow.

Given this sensitive physical, historic and ecological environment, the parish council considers it imperative that the ES fully accounts for risks and impacts that may relate to the area.

2. Scoping Issues the Parish Council Requests Be Included in the ES

a) Heritage and the Historic Environment

We request that the ES includes a comprehensive assessment of the potential direct, indirect and setting impacts upon heritage assets in our parish, including but not limited to:

- Church of St Michael, Farndish (Grade I) — especially its setting within a tiny historic hamlet, its relationship to surrounding farmland and open views, and its importance as a nationally significant medieval church.
- Hinwick House (Grade I) and the wider estate setting.
- *Hinwick Hall (Grade II)** including its registered grounds.
- St Mary's Church, Podington (Grade I) and associated churchyard areas.
- All listed Grade II structures across the parish (cottages, farms, barns, bridges, walls, etc.).
- Conservation Area character in Podington and Hinwick, including important long-range and rural setting views.
- Archaeology, including Roman and medieval activity known in the area.

Assessment should include visual impact, setting, noise/vibration disturbance, construction traffic effects and cumulative effects with any existing infrastructure.

b) Landscape and Visual Amenity

We request that the ES evaluates:

- Visibility of any infrastructure or construction works from our ridgelines, conservation areas and key viewpoints.
 - Effects on open countryside character, hedgerow networks and historic fieldscapes.
 - Cumulative landscape effects alongside existing substations, pylons and other electrical infrastructure.
-

c) Ecology, Biodiversity & Green Infrastructure

The ES should consider:

- Farmland bird habitat (skylark, yellowhammer, barn owl).
 - Ponds, streams, bat corridors and hedgerow networks.
 - Any indirect disturbance (noise, lighting, transport) during construction.
-

- Impacts on the Green Infrastructure Network identified in Bedfordshire planning documents.
-

d) Traffic, Transport & Rural Road Impacts

A full transport assessment must consider:

- HGV routing, particularly avoiding narrow local lanes (Farndish, Hinwick, Podington).
 - Road safety risks for pedestrians, cyclists and equestrians.
 - Cumulative traffic impacts due to other local venues (including Santa Pod).
 - Temporary infrastructure (compounds, lay-bys, road widening, temporary traffic controls).
-

e) Community & Amenity

We request assessment of:

- Noise, vibration, lighting impacts on residents.
 - Effects on local open spaces, churchyards, heritage settings, and tranquillity.
 - Potential disruption of footpaths and bridleways connecting the villages.
-

f) Hydrology, Drainage & Flood Risk

Assessment should include:

- Surface water drainage impacts, especially in low-lying areas around Farndish.
 - Risks of construction-related run-off into ponds or watercourses.
-

g) Cumulative Impact Assessment

Given the parish's sensitive heritage and landscape character, we request a thorough cumulative assessment including:

- Existing grid infrastructure.
 - Santa Pod Raceway operations.
 - Recent or proposed developments affecting highways and tranquillity.
-

3. Requests for Clarification and Data

We request that National Grid:

1. Provides access to spatial study-area data so we can confirm any overlaps with or proximity to the parish.
 2. Engages directly with the Parish Council during subsequent design and consultation stages.
 3. Shares the Preliminary Environmental Information Report (PEIR) at the earliest possible stage.
-

4. Holds at least one locally accessible consultation event for our residents.
-

4. Conclusion

The Parish Council believes that the heritage and landscape assets in Podington, Hinwick and Farndish — especially the Church of St Michael, Farndish, Hinwick House, Hinwick Hall and the Podington/Hinwick Conservation Areas — require careful and detailed assessment within the Environmental Statement.

We appreciate the opportunity to comment at the scoping stage and request that all issues highlighted in this letter are fully reflected in the Scoping Opinion.

Yours faithfully,



Clerk, Podington, Hinwick and Farndish Parish Council

From: RPC Clerk <rippingalepc@gmail.com>

Sent: 02 December 2025 08:48

To: Weston Marsh to East Leicestershire

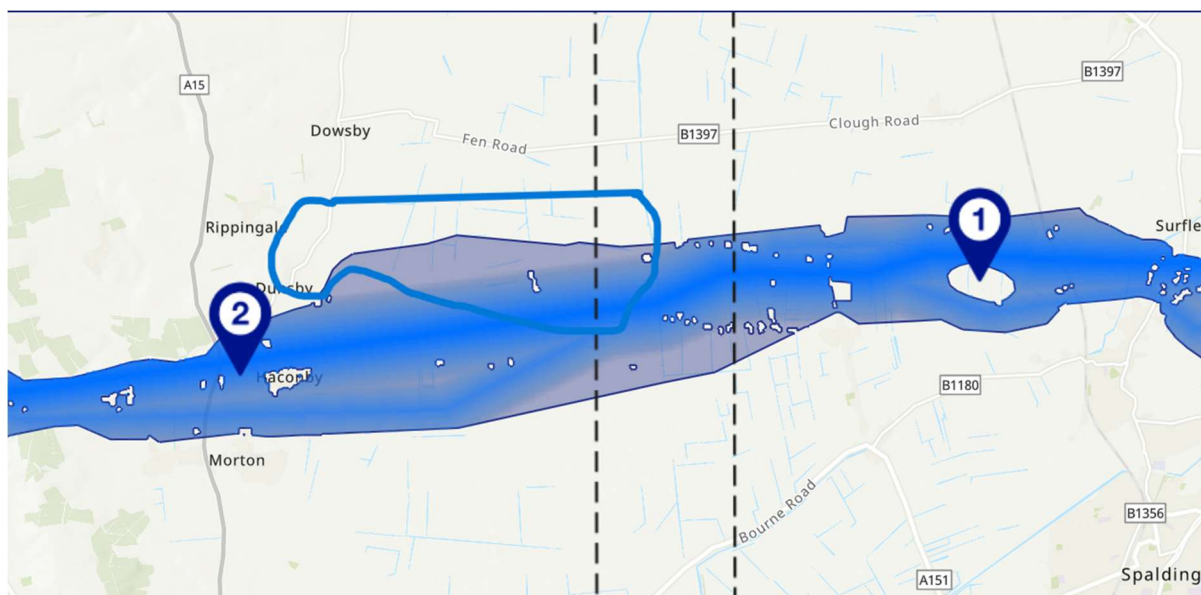
<westonmarshtoeastleics@planninginspectorate.gov.uk>

Subject: Fwd: National Grid Environmental Impact Assessment contribution

Dear Planning Inspectorate

As a neighbouring Parish Council to the proposed National Grid erection of pylons, we hereby submit our contribution towards the scoping opinion

Utilising National Grid's own suggested route plan, the image below has an area drawn to identify the areas of nature and wildlife of Rippingale Fen and into the village. Rippingale sits at a transition of Fens and rolling countryside, providing habitats for a diverse range of species. New pylons and transmission lines could negatively affect these environments and ecosystems, particularly in the Fenland areas.



Nature:

Our resident nature expert who is a nature journalist, advises that;

Our fens frequently host large flocks of plovers during the winter months; mostly Lapwings and Golden Plovers. As these birds often fly at night the possibility of collisions with cables is very likely. There are also flocks of Fieldfares, Redwings, Starlings and of course Woodpigeons during the autumn and winter months.

Attached is a photo of Whooper Swans taken a week or so ago feeding in maize stubble in Rippingale Fen. Swans flying into overhead cables is a frequent and well known phenomena.



Find below a list of wildlife of our local fens.

Mammals

Fox

Badger

Otter - visitor

Water Vole

Field Vole

Bank Vole

Wood Mouse

House Mouse

Brown Rat

Grey Squirrel

Mole

Common Shrew

Pygmy Shrew

Roe Deer

Fallow Deer

Muntjac

Rabbit

Brown Hare

Bats – various species

Butterflies

Red Admiral

Peacock

Comma

Small Tortoiseshell

Common Blue

Holly Blue

Orange Tip

Large White

Small White

Green-veined White

Orange Tip

Brimstone

Speckled Wood

Meadow Brown

Ringlet

Small Heath

Small Copper

Large Skipper

Small Skipper

Essex Skipper

Moths – too many to list

Dragonflies

Brown Hawker

Southern Hawker

Migrant Hawker

Emperor

Hairy Dragonfly

Four-spotted Chaser

Broad-bodied Chaser

Common darter

Ruddy Darter

Damselflies

Common Blue

Azure

Variable

large Red

Emerald

Willow Emerald

Red-eyed Damsel

Reptiles and Amphibians

Grass Snake

Slow-worm

Common Frog

Common Toad

Smooth Newt

Birds

Little Grebe

Cormorant
Grey Heron
Little Egret
Great White Egret
Mute Swan
Whooper Swan
Greylag Goose
Pink-footed Goose
White-fronted Goose – occasional winter visitor
Canada Goose
Mallard
Shoveler
Wigeon
Teal
Gadwall
Tufted Duck
Pochard
Moorhen
Coot
Oystercatcher
Redshank
Snipe
Woodcock
Curlew
Lapwing
Golden Plover
Herring Gull
Common Gull
Lesser Black-backed Gull
Greater Black-backed Gull
Black-headed Gull

Common Tern

Pheasant

Red legged Partridge

Grey Partridge

Woodpigeon

Stock Dove

Turtle Doves – very rare in Lincolnshire now

Collared Doves

Feral Pigeon

Raven – at least 2 breeding pairs

Carrion Crow

Rook

Jackdaw

Jay

Magpie

Starling

Great Tit

Blue Tit

Coal Tit

Long-tailed Tit

Nuthatch

Treecreeper

Great-spotted Woodpecker

Green Woodpecker

Kingfisher

Buzzard

Red Kite

Marsh Harrier - nests

Hen Harrier – occasional winter visitor

Sparrowhawk

Peregrine

Kestrel

Merlin

Hobby – occasional breeder

Tawny Owl

Little Owl

Barn Owl

Short-eared Owl

Long-eared Owl – some found in a copse a few years ago

Meadow Pipit

Grey Wagtail

Pied Wagtail

Yellow Wagtail

Barn Swallow

House martin

Sand Martin

Blackbird

Mistle Thrush

Song Thrush

Redwing

Fieldfare

Robin

Stonechat – winter visitor

Whinchat -occasional passage migrant

Wheatear – regular passage migrant

Dunnock

Wren

Whitethroat

Lesser Whitethroat

Blackcap

Reed Warbler

Sedge Warbler

Cetti's warbler

Chiffchaff

Willow Warbler

Goldcrest

Chaffinch

Brambling

Bullfinch

Greenfinch

Goldfinch

Linnet

Redpoll

Siskin

Twite – one record from Dunsby Fen

House Sparrow

Tree Sparrow

Reed Bunting

Yellowhammer

Cranes almost certainly pass over and possibly feed in our fens which is close (as the crane flies) to Willow Tree Fen where they nest.

Ecology and Biodiversity:

Key surveys (bats, breeding birds, invertebrates) are incomplete or deferred within the proposal. There is no clear biodiversity net gain calculation or commitment. What consideration is given to the migratory birds that gather in numbers in the area?

Flood Risk and Water Environment:

The drainage and runoff modelling in the proposal is generic, with no detailed design or cumulative flood risk assessment.

The East end of Rippingale, heading towards the Fen is well documented as a flood risk and in recent weeks has required a standby emergency team of willing villagers out in all weathers and at all hours, to clear drains, grilles and dykes to ensure villagers' properties were not put at risk

during recent heavy rainfall. The concern would be if the proposed route was to change to nearer to Rippingale the impact this would have or indeed even the disruption to the local area from construction traffic and the disruption of the landscape, forcing rainfall to find another course, changing the landscape forever.

Farmland:

The proposed route crosses productive farmland, which may affect soil health, drainage, and food security. Development guidelines including NPPF para 174(b) and DEFRA's Food Strategy 2022 promote the protection of soil and agricultural land. The long-term consequences of trenching and substation construction could introduce changes to the agricultural landscape.

73% of Lincolnshire is farming land. Weston marsh proposal would cut through prime farming land, farming barley, wheat and sugar beet, rendering it unusable. Anglian Water projects within Lincolnshire have already affected productivity. At this time of concern for food security, farming land within Lincolnshire must be protected.

Rippingale Parish Council supports the view of 'LAND' - 'Lincolnshire Against Needless Development' - regarding the WMEL route proposal:

"The Weston to East Leicestershire proposal is not a grid upgrade — it is a strategic misstep, a procedural failure, and a threat to the integrity of national planning. It presumes approval of unbuilt infrastructure, ignores cumulative harm, and bypasses the very strategic planning process designed to prevent this kind of fragmentation. We object not because we oppose clean energy — but because we demand clean governance, fair process, and respect for the landscapes and communities that will bear the cost.

This is not a corridor of progress — it is a corridor of presumption. And it must be paused, reassessed and re-presented with all recommendations considered."

LAND Formal Objection 2025

Kind regards,



Clerk of Rippingale Parish Council



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EIA Scoping Report – Weston Marsh to East Leicestershire Development Consent Order

Royal Mail response – 05/12/2025

Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.

Royal Mail and its advisor BNP Paribas Real Estate have reviewed the EIA Scoping Report dated 06 November 2025. This infrastructure proposal has been identified as having potential for impact on Royal Mail operational interests. However, at this time Royal Mail is not able to provide a formal consultation response due to insufficient information being available to fully assess the level of risk to its operation and the potential mitigations for any risk.

Therefore, Royal Mail wishes to reserve its position to submit a consultation response/s at a later stage in the application process, if required.

In the meantime, any further consultation information on this infrastructure proposal and any questions of Royal Mail should be sent to:

[REDACTED]@royalmail.com), Senior Planning Lawyer, Royal Mail Group Limited, 185 Farringdon Road, London, EC1A 1AA

[REDACTED]@struttandparker.com), Planner, Strutt & Parker/ BNP Paribas Real Estate, B1 Brooklands, Clarendon Road, Cambridge, CB2 8EE

[REDACTED]@realestate.bnpparibas), Director, BNP Paribas Real Estate

Please can you confirm receipt of this holding statement by Royal Mail.

End



Development Team
Rugby Borough Council
Town Hall
Evreux Way
Rugby
CV21 2RR

Reference: PR25/0778

Date:12-Nov-2025

Katie Norris
Environmental Services
Operations Group 3
Temple Quay House
2, The Square
Bristol
BS1 6PN

Dear Katie Norris

Proposal: Planning Inspectorate Consultation EN0210007 - A new circa 60 kilometre 400kV transmission connection between the following 400kV transmission substations, described east to west:

- **Connection into Weston Marsh substation infrastructure in Lincolnshire (to be constructed under the Grimsby to Walpole project);**
- **A new 400kV transmission substation (WMEL-A) near Corby Glen in Lincolnshire;**
- **A new 400kV transmission substation (WMEL-B) near Wartnaby in Leicestershire; and**

The Project also includes reconductoring of approximately 55 kilometres of existing transmission infrastructure from WMEL-B substation to the existing Grendon substation, east of Northampton

Site Address: Weston Marsh to East Leicestershire

I refer to your consultation of 07-Nov-2025 regarding the above.

Rugby Borough Council Local Planning Authority can confirm we do not have any comments.

I trust this is useful.

Yours sincerely


Rugby Borough Council

From: [REDACTED]@rushcliffe.gov.uk>

Sent: 28 November 2025 16:29

To: Weston Marsh to East Leicestershire

<westonmarshtoeastleics@planninginspectorate.gov.uk>

Subject: EN0210007 - Weston Marsh to East Leicestershire NSIP Consultation Response

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OFFICIAL

Dear Sir/Madame,

In response to your letter dated 7th November 2025, I can advise that Rushcliffe Borough Council has no comments to offer at this time.

We note that this is a consultation in respect of the Scoping Opinion only, and reserve the right to comment further in response to later consultations should we feel it necessary.

Kind regards,

[REDACTED]

Team Manager – Area Planning (Central)

Rushcliffe Borough Council

[REDACTED]

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Salford Parish Council.

Objection number 2 to WMEL-B Route Section 5 and 6.

The role of Salford Parish Council, as an independently elected body, is to represent the community, deliver local services and improve the quality of life for residents living in the parish. To that end we have been approached by residents regarding the proposed new overhead line route corridor. On behalf of the village and the outlying homes and businesses within the Parish of Salford, Salford Parish Council is objecting to the currently proposed routing of the pylons and cables located in **Route section 5 / 6 A607 - WMEL-B** between Melton Spinney Road and the Melton and Grantham A607 on the basis of the points listed below.

We believe there are alternative routes within National Grid's blue routing area which would have less impact on the village of Salford, outlying homes, businesses, the local environment, amenity use of our land and would be better aligned with the **Holford Rules** and the **Salford Neighbourhood Plan** and importantly, reduce the impact on residents.

The Parish Council has studied the proposed route which passes to the south side of Salford and threads between, and close to, a number of properties including; Salford Lodge Farm House (and bungalows), Glossoms Farm, The Hindles, Hill Top Farm, Goldsmith Grange, Bungalow at Goldsmith Grange, Cumberland Lodge and Debdale Farm. The proximity of the route to the properties means that it will be highly visible and overbearing to residents.

The Parish Council strongly believes there to be alternative routes which would not only have less impact on Salford village, the landscape, views, environment, amenities and businesses but that would also adhere to the Salford Neighbourhood Plan and the Holford Rules.

Salford Parish Council has consulted with and has heard representations from parishioners at council meetings and community group meetings.

In order that the Planning Inspectorate has a complete picture of our parishioners' views here is a concise summary from these sessions which we are including into our objections to National Grid's route South of Salford.

1. The Parishioners are supportive of the need for national energy security and understand the importance of it. However, they are rightly protective of the environment they live in, the wildlife habitats and the long term need to ensure our countryside is protected and remains unspoilt.
2. It is imperative that this unique countryside environment must not become an industrialised landscape, leaving a horrific legacy for future generations of countryside

dwellers. As we experience daily, once a structure is constructed it is not removed for generations to come and remains an unnatural 'blot on the landscape'.

- In 2012 planning application 11/00677/FUL (for a wind turbine 50m to the hub) was rejected by the Planning Inspectorate (thus creating a precedent) on the basis, it would create a more industrialised looking landscape and have visual impact on the Wolds and surrounding countryside.
- The proposed pylons would substantially build on this and create an industrial look to this unique countryside landscape. Construction of the pylons and commercial buildings must be limited.

3. The National Grid itself states that it is "passionate about playing our part in conserving and enhancing the natural beauty, wildlife and cultural heritage of the landscape." Yet to date, the National Grid's planning of the new overhead line route has offered limited consideration to Scaford's unique landscape and has not considered the Scaford Neighbourhood Plan. This neighbourhood plan sets out planning policies on issues like housing, environment, community facilities, and transport to ensure that future changes align with the community's preferences and priorities. It also clearly sets out vistas, viewpoints and protected land, including the land south of Scaford that is precious and unique in many ways. Such as:
 - It forms part of the Leicestershire Wolds with stunning rolling hills, paddocks lined by well-maintained hedgerows and woodland.
 - This land rises to over 400ft, creating a wonderful and unique backdrop to the market town of Melton Mowbray and an amenity area for villagers via footpaths and bridleways.
 - Much of this land has not been cultivated for centuries and remains as medieval ridge and furrow pastureland (part of the ancient site of Goldsmith Grange) as it would have been during the period of 1066 to 1485.
 - It is a natural haven for wildlife because much of it remains uncultivated, as pastureland with hedgerows, trees, woods and waterways.
 - National Grid has ignored the designated vista points which are important to the Parish and assigned in the Neighbourhood Plan.
 - These unspoilt vistas and medieval land must be worth protecting for future generations.
4. As mentioned above, the route runs extremely close to residents' homes, farms and businesses. This proposal is currently causing great anxiety amongst our parishioners due to the impact it will have on their lives, both short and long term. Parishioners' lives will be unreasonably affected by the unpredictability caused, such as likely devaluation of property, inability to move home as potential buyers would be discouraged for at least seven years, along with the significant disruption during construction and the ongoing impact on the farms and other rural businesses.
5. National Grid seems to show no regard for its own guidelines - The Holford Rules - and routing the cables and pylons along valleys and low land where the visual impact would be masked and minimised.

6. There are other potential routes in the area - such as south of Melton Mowbray where the land is not the Wolds and is simple flat arable and pastures land with less historic value.
7. If National Grid is determined to use this route, then the Planning Inspectorate should insist National Grid bury the cables through this section of the Leicestershire Wolds (as they are in the Cotswolds) to protect this unique and ancient landscape for future generations and current parishioners and home owners.
 - National Grid's response to burying cables to Alicia Kearns MP on the 16th October 2025 was a "no", based on a cost issue.
 - However please consider this; National Grid is a shareholder-owned corporation, and their primary interests are to these shareholders (providing a return on investment) and not to the UK residents or our countryside.
 - The major shareholders of National Grid are global investors such as Bank of New York Mellon Corp, Black Rock Fund Advisors, Abu Dhabi Investment Authority, to name a few. It goes without saying that these corporations have very little interest in the UK countryside.
 - Burying the cable would provide a significant benefit to our parishioners and other users of the countryside, not only reducing the stress and anxiety of having to live next to pylons for years to come, but also decreasing the potential adverse effect on home and land values and disruption to businesses. Additionally, it would keep our countryside free of industrial structures. Would this not be a sound investment and a good deed for the Scalford parishioners and other countryside users by National Grid and its shareholders to protect this countryside?

In summary, the residents of the Scalford Parish request the Planning Inspectorate supports the view that the electrical cables are buried through this section of the WMEL route which will protect the vistas, the wildlife habitats, the Wolds landscape (unique to this area), residents' homes and farm land for current and future generations.

The following pages set out our objections to the proposed route along with solutions for your consideration during this consultation process.

The reasons for our objections are as follows:

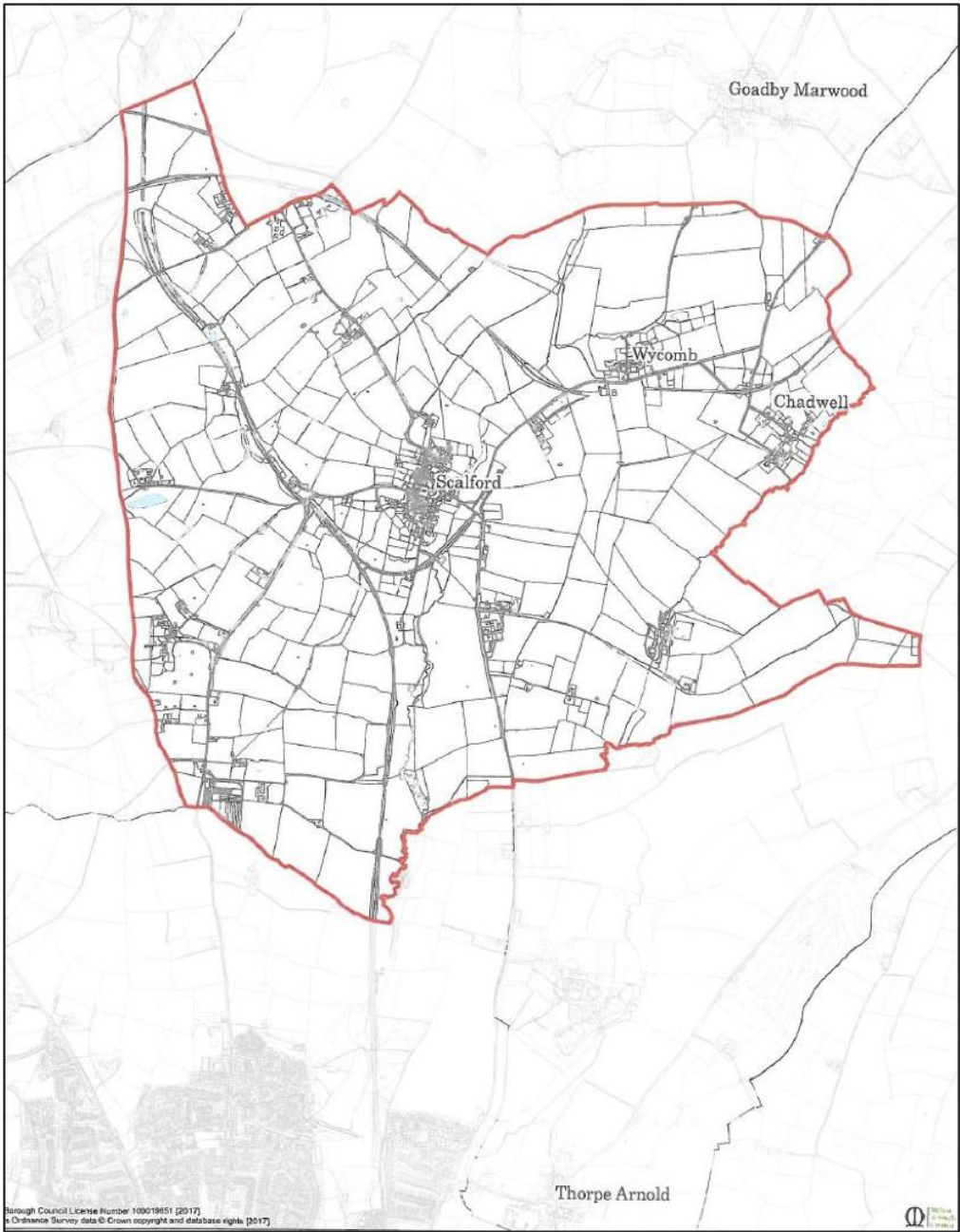
Scalford Neighbourhood Plan. (Extracts and maps from the plan).

It appears that the Scalford Neighbourhood Plan has not been considered whilst National Grid was planning this route - therefore as the Parish Council of Scalford it is our duty to raise this with National Grid and the Planning Inspectorate.

We have attached a copy of the Scalford Neighbourhood Plan, and we would like to draw your attention to a number of aspects, such as vistas, historic medieval land and environmental significance.

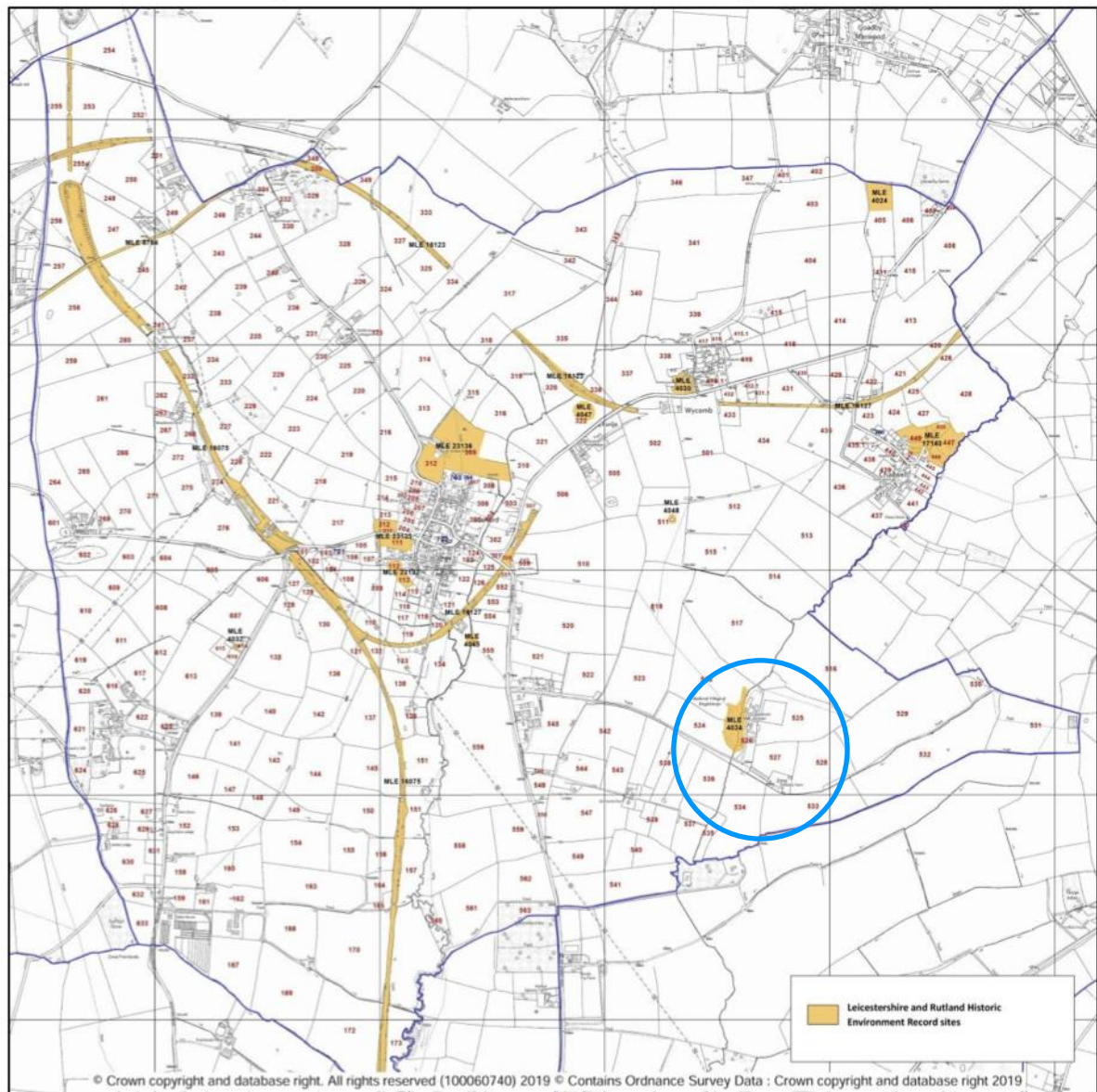
on the southwest, south and southeast boundaries of the Parish of Scalford.

Figure 1 – Parish of Scalford – Designated Area



Sites of environmental significance (see **page 32** of the SCALFORD NEIGHBOURHOOD PLAN) MLE3034 Medieval Village (located close to Goldsmith Grange / Debdale Farm) part of the medieval farmland and moat associated with the village known as Ringlethorpe.

Fig. 6.1: Sites of historical environment significance



Historic England Research - Ringlethorpe Village - location of Goldsmith Grange / Debdale Farm

Extract from Historic England Research report to support the SCALFORD NEIGHBOURHOOD PLAN.

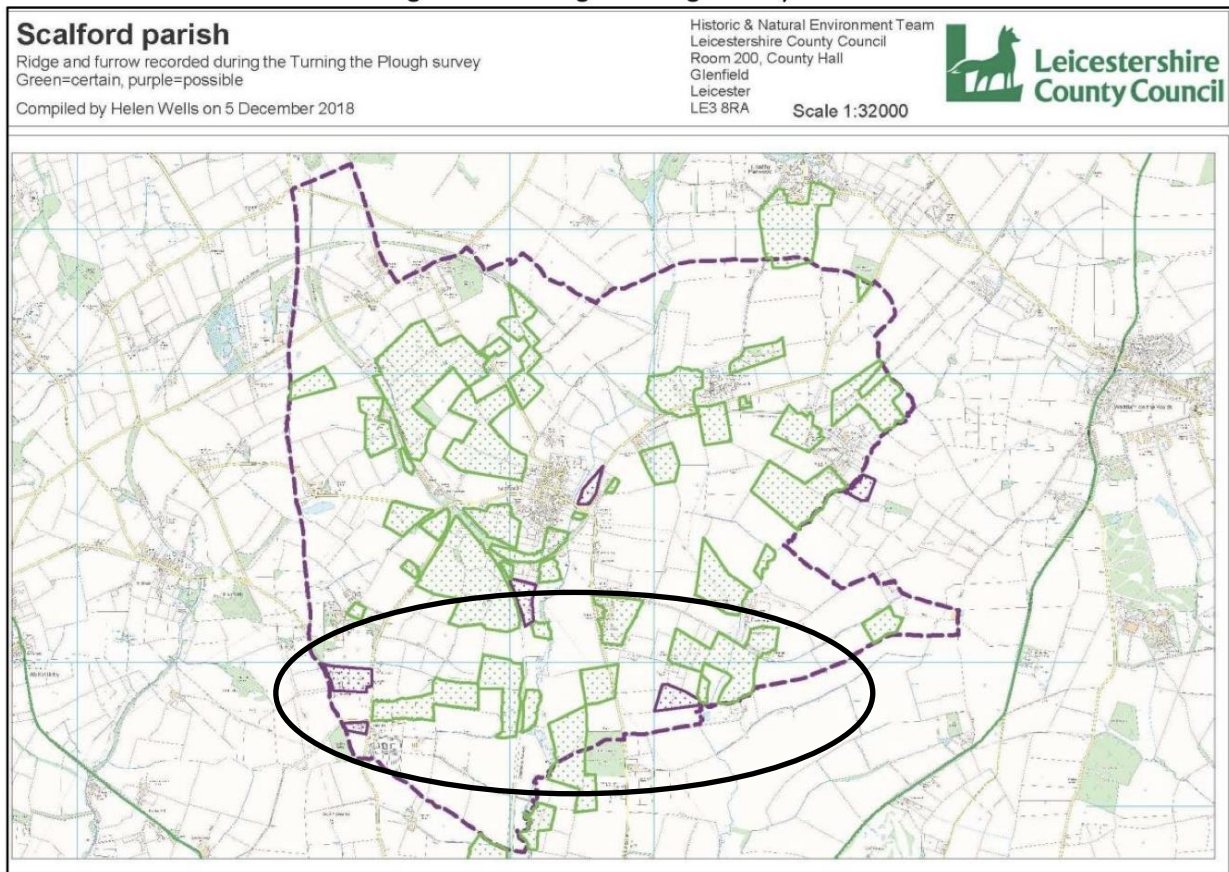
Earthworks of a small village and hamlet lie centred SK 776233.

A small irregular moat SW of the modern farm, possible remains of a rectangular one to the north, degenerate terracing, boundary headlands and a few steadings comprise the surviving features. In permanent pasture amid ridge and furrow.

Please see link.

https://www.heritagegateway.org.uk/Gateway/Results_Single.aspx?uid=321486&sourceID=19191

Figure 9.1 Turning the Plough survey 1999



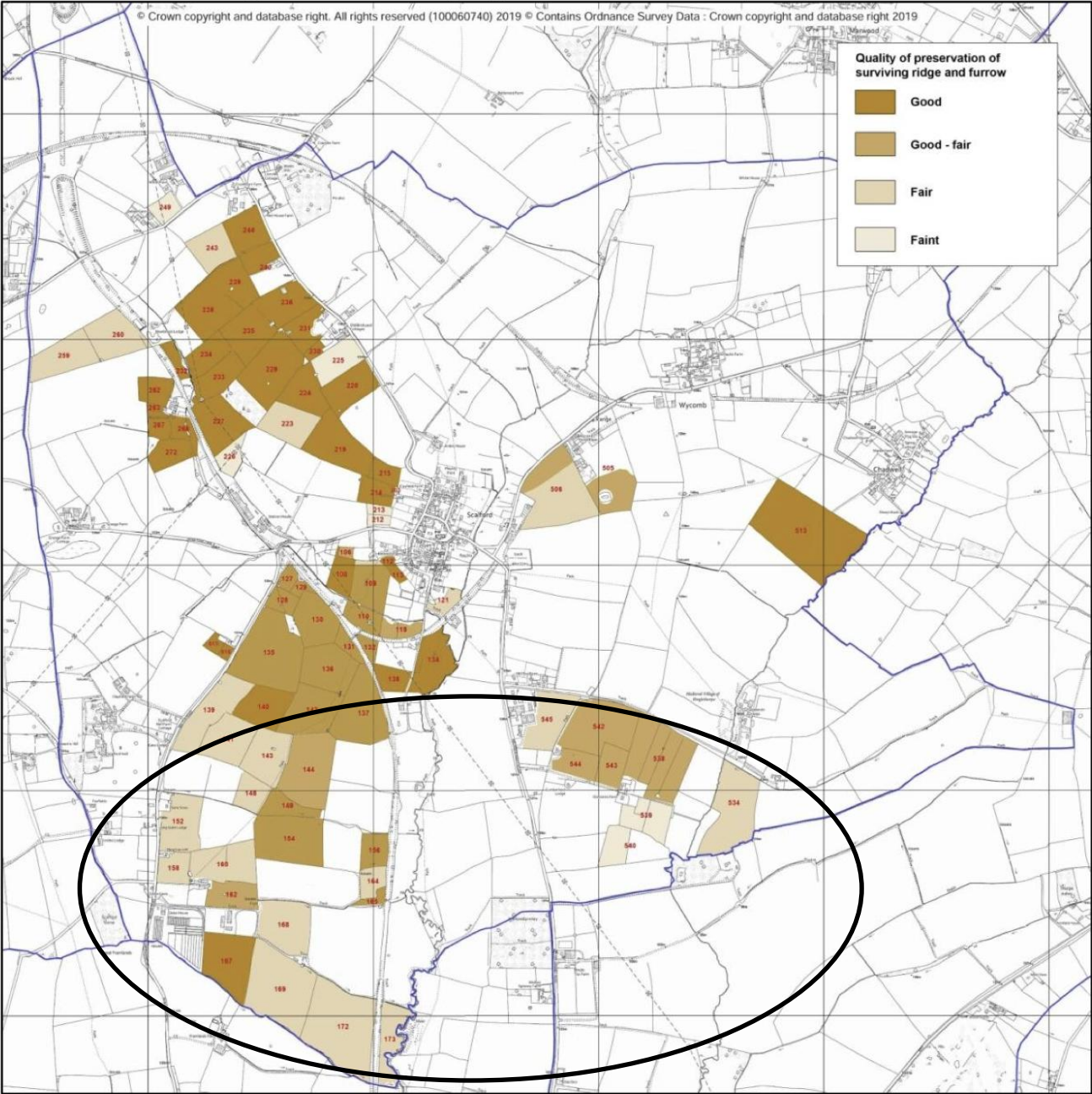
Ridge and Furrow. See pages 39/40/41 where the SCALFORD NEIGHBOURHOOD PLAN identifies the following.

The Plan Area is arguably regionally important for the survival of a significant area of archaeological remains (earthworks) showing the location and extent of the medieval settlement and layout of its open fields. (See page 40 field 534 figure 9.1 along with 9.2 of the SCALFORD NEIGHBOURHOOD PLAN).

Page 41 Policy ENV 5: Ridge and Furrow - The area of Ridge and Furrow earthworks mapped in Figure 9.2 are of regional importance for agricultural landscape history and are recorded here as non-designated heritage assets.

Any loss or damage arising from a development proposal (or a change of use requiring planning permission) is to be avoided: the benefits of such development must be balanced against the significance of the Ridge and Furrow as heritage assets.

Figure 9.2: All surviving ridge and furrow in Salford parish, 2019



Protection of important views.

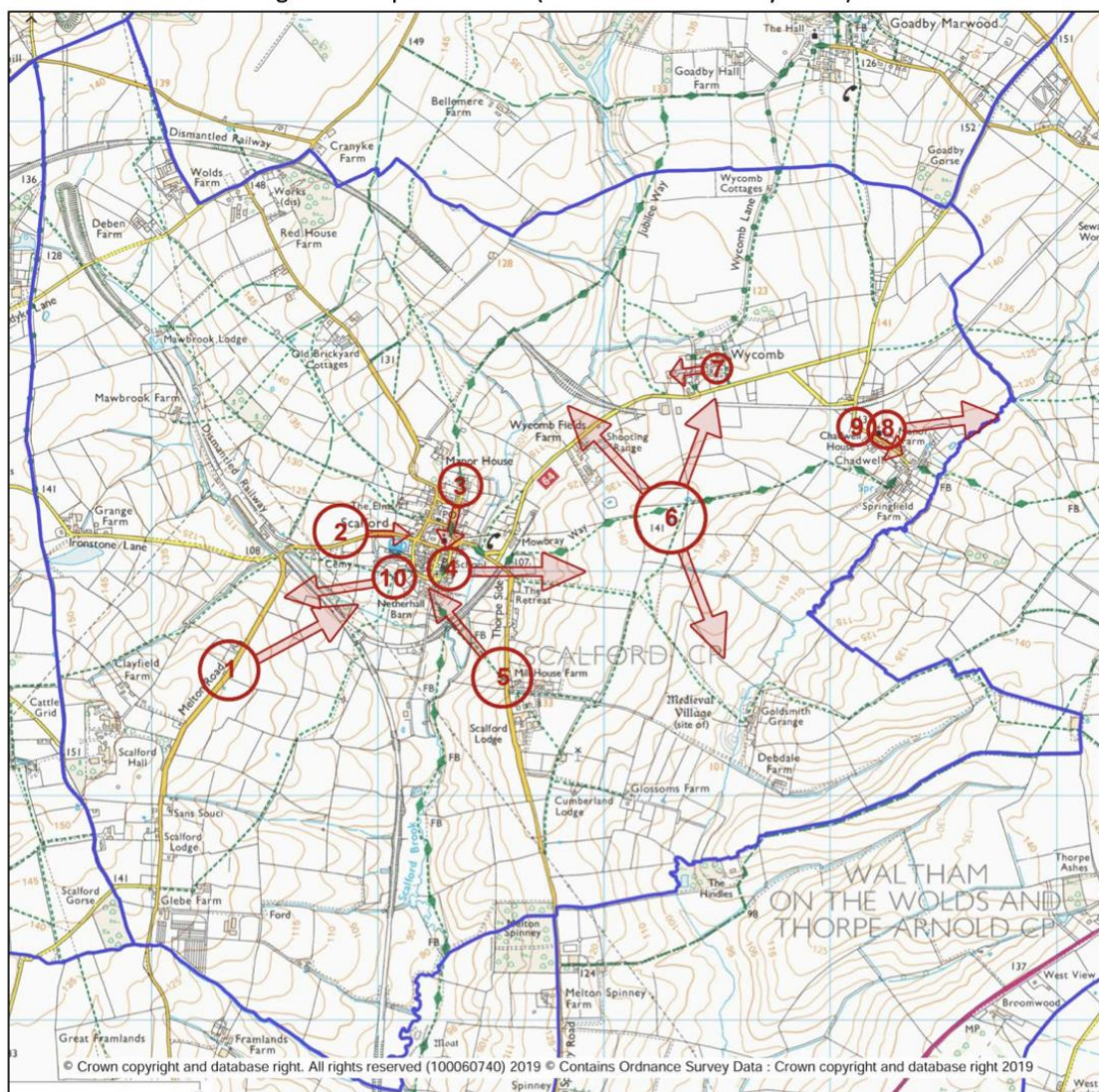
The following publicly accessible views (map figure 13 Scaford Neighbourhood Plan) are important to the setting and character of the three villages in Scaford parish and are highly valued by residents. To be supported, development proposals must not significantly harm their views, lines of sight, objectives or characters.

We would like to draw your attention to point 6) on the map – Scaford Neighbourhood Plan which states:

6. 360° panorama from the triangulation point on Mill Mound (141m), primarily a) northeast to Wycombe village, b) northwest across the upper Wycombe valley to the mineral railway hill ground in the north of the parish, and c) southeast across the long hillside toward the deserted medieval village.

[Scaford Neighbourhood Plan link](#)

Figure 13: Important views (numbers refer to Policy ENV 9)



Holford Rules not followed

National Grid's guidelines (The Holford Rules) regarding planning routes state six key points, ALL of which we believe have been ignored entirely whilst planning this route:

1) Avoiding Prominent Features - This includes avoiding high ridges, skylines, and areas of high amenity value:

- National Grid is proposing to run the cables to the South side of the village which are some of the highest points at circa 400ft. Therefore, the pylon towers will be visible from Scaford, Thorpe Arnold, Waltham and Melton. Bear in mind we are in the Leicestershire Wolds - the natural rolling landscape of this area.
- A 50m pylon would dominate the landscape and would tower over the Parish to a height of **214ft (65m)** if located at the high point.

2) Following Natural Features - Lines should ideally follow valleys, tree lines, and other landscape features to help conceal them:

- The route does not follow the natural landscape of the valley (just to the south, outside the Parish boundary which would hide many of the pylons towers. This is where the existing pylons are routed.
- The land height at the base of the valley is 320ft (97m) - this would hide the base of the pylon against by 60ft (18m) in all directions - hence less visual impact.

3) Minimising Settlements and Residential Areas - Locating lines away from populated areas helps reduce visual impact and potential disruption:

- The proposed route of the cable weaves its way close (in some cases within 100 metres) to many outlying homesteads and homes and will be 900 metres from the village of Scaford on a high elevation - a clear line of sight for the villagers.

4) Considering Public Rights of Way - The impact on recreational routes, tourist areas, and other well-used paths should be minimised:

- The cable routing passes directly overhead the bridleway and footpath to the South of the Scaford Parish boundary.

5) Using Tree and Hill Backgrounds - Choosing backgrounds that naturally screen the lines, like trees and hills, is preferred over open sky:

- The planners have not followed this rule by using the natural valley landscape on the Melton South side of the Scaford Parish boundary nor any wooded areas to the South of the village. See point 2 above.

6) Avoiding Sharp Changes in Direction - direct routes with fewer angle towers (which are larger and more noticeable) are preferred:

- The planners are proposing to erect a sharp turn Pylon directly South of Scalford village which will be seen by most residents approximately 900 metres from the edge of the village.
- Please bear in mind this pylon will be extra high as it must reach over the existing northwest / southeast Pylon route that goes around the West side of Scalford village. This will need to be an Angle Tower which is larger and more noticeable.

Planning permission rejected for wind turbines.

Planning permission was refused by the Planning Inspector (on appeal) for the erection of a 37m wind turbine on this valley ridge close to Thorpe Ashes / A607. The grounds for this refusal were concerns regarding industrialisation of the Wolds landscape by adding more structures alongside the Waltham Mast, the large agricultural barns and the other telecoms masts near Waltham on the Wolds.

Suggested alternative pylon routes.

National Grid's mapping suggests an alternative route which I have mentioned above, that would adhere to the Holford Rules.

Route option 1 (below) runs approximately 300m to the south of the current centre of blue route (but within your designated area) at a low point of 320ft (97m). Following this route would shield the base of the pylon against the hills / valley by 60ft (18m) in all directions. This could be significantly improved by using the alternative 37m high pylons - both these actions could reduce the visual impact from Scalford's vista point, medieval protected land, Thorpe Arnold and the outskirts of Melton Mowbray.

Route option 2 (see below), which follows lowland, provides shielding against the valley and has far less impact on the protected Medieval Ridge and Furrow located to the South and Southeast of Scalford village.

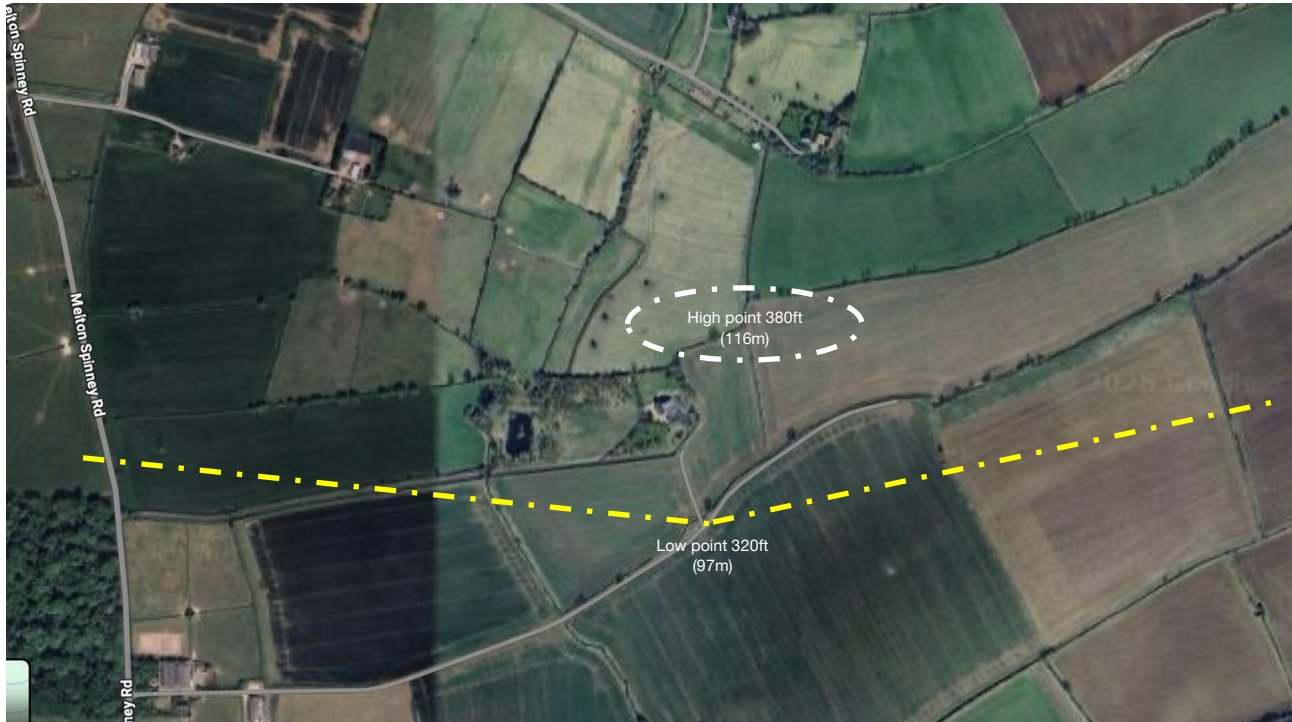
Route option 3. In order to avoid and fulfil the objectives of minimising visual and environmental impact and amenity use as stated in the Holford Rules, which make it clear that high value sites, avoiding skylines and ridges, and to minimise impacts on settlements and local communities. Thus it should be considered that it may be possible to bring the power via undersea cable from the wind turbine farms to the areas of maximum usage.

Working with National Grid during this consultation.

We have been informed by a representative of National Grid that all of the work to date has been carried out via desk research, mapping tools and only a few top-line road visits. We understand accurate surveying and impact reports on proximity to residential, businesses and land have not been carried out to the required level.

Scaford Parish Council would like to find a way of working with National Grid to ensure minimal impact is made on the Village and the Parish.

Route option 1. Follows the low valley base mitigating some scenic disruption and damage to the protected Medieval Ridge and Furrow.



Route option 2. Significantly less impact on Scaford Village residents, follows lowlands of valley mitigating scenic disruption and major damage to the protected Medieval Ridge and Furrow.



Devaluation of property.

Having pylons close to the Village of Scalford and outlying homes within the Parish would substantially affect property values, significantly reduce the attractiveness of the property to future buyers and turn others away from our Village. Properties would be 'Black Balled' to buyers and will significantly reduce appeal.

London School of Economics has conducted studies regarding house prices that are within 300 metres of power lines, where the value of their property collapses by at least 21% - this would be a significant devaluation of nearby properties and even more importantly buyers would not want to live so close to power cables, making a sale impossible.

Mental Health Assistance.

National Grid has sprung this proposed development on the residents and businesses in proximity to the preferred cable route. This has come as a complete surprise and there are concerns about how this construction plan will affect lives, property values, businesses and pensions. This proposal has 'Black Balled' residents, putting their lives on hold for at least 8 years from selling their properties, planning the future, investing in their business and living their lives.

National Grid has not considered how this proposal will (and now has) started to affect people's mental health through stress, anxiety and depression.

National Grid needs to set up counselling services for residents immediately to cover mental health, financial impacts, and future life planning.

Conclusion

Scalford Parish Council is objecting to the proposed routing of the pylons and cables located in Route section 5 / 6 A607 - WMEL-B between Melton Spinney Road and the Melton and Grantham A607 on the basis of the points listed in this document on behalf of the Village, the outlying homes and businesses within the Parish of Scalford. Secondly, if they insist pylons are erected, they route the pylons and cables along the lowest and less populated areas of the valley (route 2 above) which will mask them by hill sides / valley walls and vegetation. Along with this, please note route 2 runs the furthest from residents' homes.

We would request the Planning Inspectorate reviews the current route and recommends to National Grid that in the first instance they bury the cables or consider routing them via the UK coast instead of through this area of the countryside. Appendix 1 gives details.

Scalford PC has looked into undersea as an alternative and the costs are significantly better than burying underground and comparable to overground when taking into account compensation payments, construction time etc.

This is a true alternative which will benefit many hundreds of residents and businesses along this route and keep our countryside from becoming an industrial landscape - please look at our findings and raise this with NG as a serious alternative.

APPENDIX 1.

29th November 2025

A proposal with costs to run the proposed WMEL power undersea

Summary

The natural landscape of England is a vital and irreplaceable resource which needs to be preserved for future generations to benefit from. National Grid and their shareholders should invest in offshore routing to preserve our countryside, mitigate irreversible damage, destruction of wildlife habitats and the industrialisation of the landscape - once destroyed it can never be reclaimed.

The Parish Council accepts that there is a cost to preserving our countryside and this document illustrates the additional cost of running undersea cables instead of overland is circa £778m, or 0.03% of GDP, a price worth paying to say “No” to defacing the national landscape.

Proposal

The three main sources of information used in this proposal are given below.

The cost of building a new 400kV electricity transmission line varies significantly based on whether the line is constructed overhead or underground:

- Overhead (OHL) 400kV Line: The cost is typically around £1.2m to £2.5m per kilometre. Recent UK examples estimate overhead construction at approximately £2.5m/km for double circuit lines.
- Direct Buried Underground 400kV Cable: The capital cost is much higher, ranging from about £13.5m/km to £18m/km depending on ground conditions and installation method.
- Underground Cable in Tunnel: This can increase costs further to £15m–£18m per km, especially if concrete tunnels are required.

In summary, a new 400kV overhead transmission line in the UK currently costs about £2.5m per km, whereas underground solutions are 5–8 times more expensive depending on installation method and site specifics.

The three most important sources for the cost figures and comparative analysis of overhead versus underground 400kV electricity transmission lines in the UK are:

1. The IET Electricity Transmission Costing Study (2012) and summaries derived from it: This industry-standard report provides cost breakdowns for 400kV overhead lines and direct buried/tunnel cable solutions, with figures such as approximately £2.5m/km for double-circuit overhead lines and £13.5m–£18m/km for underground

cable options, widely cited in UK industry documents and government consultations.

2. Feasibility analysis and project reports for UK 400kV transmission line projects, which confirm and update cost ratios. For instance, the Hinkley–Seabank report and recent infrastructure overviews provide per km figures and compare lifecycle costs, consistently stating that underground solutions are about 5–8 times the cost of overhead lines, with key data from real UK projects in the last decade.
3. Independent evaluations and summary sites (such as Tratos Group and CPRE/Parliamentary briefings): These sources help synthesize and contextualize data from National Grid, Ofgem, and the IET by summarizing cost ranges cited in recent National Grid projects and industry-accepted averages—again confirming the range of around £2.2m–£4.2m/km for overhead and £10.2m–£18m/km for underground installation, plus commentary on why cost differentials exist.

These key sources are widely referenced in the electricity transmission industry, government consultations, and academic analysis for transmission infrastructure cost estimation in the UK.

The cost of installing undersea (subsea) electricity transmission cables to bring power to the coast from offshore wind farms—especially for 400kV HVDC (High Voltage Direct Current) or HVAC (High Voltage Alternating Current) systems—is significantly higher than equivalent land-based lines.

Typical Cost Ranges

- Subsea/HVDC Export Cable (Transmission):
 - The typical installation cost for large-capacity undersea transmission cables is £2 million to £3 million per kilometre for HVAC export cables (132–220kV, commonly used for nearer-shore wind farms).
 - For higher voltage and/or longer distance HVDC export cables (e.g., 320–400kV), costs can rise to £3 million to £4 million per km or higher.
 - Some recent global projects have reported costs in dollar terms of \$1 million to \$2 million per km (£800,000 to £1.6 million per km) for cable supply and installation, but UK/EU projects are typically at the higher end due to technical and regulatory requirements.
- Breakdown Example (Recent UK Projects):
 - In the Ofgem draft assessment for a recent Scottish offshore wind export transmission system, the *final transfer value* for transmission assets (including substations and around 60km of subsea cable) was £621.2 million, equating to roughly £3–£3.5 million per km for export cables alone.
 - Laying costs can vary depending on seabed conditions, route complexity, cable capacity, and whether cable burial/protection is required.
- *Cable installation, accessories, and protection* can add another 30–50% to the baseline cable price, and installation vessels alone can cost over \$200 million and operate for hundreds of thousands of dollars per day.

Key Considerations

- Offshore Wind Transmission almost always uses submarine cables. Projects farther from shore increasingly use HVDC for lower losses and higher capacity.
- Prices are trending upward due to raw material cost increases (e.g., copper), supply chain bottlenecks, and growing global demand for HVDC cable—production is reportedly booked out for years.
- Export cable costs are a major contributor, often 10–15% of an offshore wind farm’s total capital expenditure.

Summary Table: Typical Subsea Export Cable Costs (2024)

Transmission Type	Typical Voltage	Typical Cost per km
HVAC Export Cable	132–220kV	£2m–£3m
HVDC Export Cable	320–400kV	£3m–£4m

Costs can vary significantly by location, complexity, and market conditions.

In summary:

To connect sea-based wind farms to the grid, expect undersea (export) cable costs of £2 million to £4 million per kilometre—potentially more for challenging projects or where HVDC is used for higher capacity and longer distance.

National Grid literature states that the length of the overland line for the proposed WMEL would be approximately 60 km. The distance undersea would be somewhat longer, estimated at 232km, so to summarise the total cost for the proposed WMEL line.

Method	Cost per km, £m	Km	Cost, £m
Overland	2.5	60	150
Underground	16	60	960
Underground in tunnel	18	60	1080
Undersea	4	232	928

The above figures do not include the cost of the proposed new switching station at Wartnaby, plus the cost of the proposed up upgrading the North-South transmission line, nor the cost of running lines to the east coast; none of these would be required if the line was run undersea.

Data has now been provided by National Grid (letter to Alicia Kearns dated 16th October 2025) of their costs for providing an underground solution, £2,911.7million, and £597.8million for their overhead line proposals. Since the cost of the underground solution (in tunnel but not including extras) is £1080million, there are clearly other costs

included, such as the proposed new switching station at Wartonaby, and compensation to the affected landowners. It is suggested here that an undersea solution at £928million would cost less than the underground solution proposed by National Grid.

Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Your Ref:
Our Ref: H22-1091-25
Contact: [REDACTED]
E-mail: [REDACTED]@e-lindsey.gov.uk
Date: 5th December 2025

Dear Sir or Madam,

RE: EN0210007- Application by National Grid Electricity Transmission plc (the applicant) for an Order granting Development Consent for the Weston Marsh to East Leicestershire (WMEL) (proposed development).

EIA Scoping Consultation under the Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11.

Thank you for your consultation request under regulation 10(6) of the EIA Regulations. South Holland District Council (SHDC), as a consultation body and host authority, wishes to make the following comments in regard to the information provided within the Environmental Impact Assessment (EIA) Scoping Report.

Introduction

The Project involves the upgrading of the electricity transmission system between Weston Marsh and East Leicestershire by:

- building a new 400,000-volt (400 kV) overhead line,
- replacement of the wires (conductors) on approximately 55 km of existing overhead line and two new substations.

Not all of the Project falls within SHDC administrative boundary with the majority of Section 1 of the new 400 Kv Overhead Line between the Weston Marsh connection point and immediately to the West of South Forty Foot Drain situated within.

The OHL routes west crossing the River Welland and A16 continuing west between Pinchbeck and Surfleet with options north and south of residential properties at this location. The OHL then crosses railway line avoiding farms to the north and south passing north of the moated site of Newhall Grange a scheduled monument onward to South Forty Foot Drain passing between properties of Parsons Drove and Star Lode Drove.

The EIA Scoping Response does not reflect the views of the County Council and nor does it make comments upon matters that are the County Councils Statutory

Function such as acting as Local Highway and Transport Authority, Minerals & Waste Planning Authority and Lead Local Flood Authority. There is also agreement with the County Council, that they will act on the districts behalf in relation to Archaeology matters.

In producing this EIA Scoping Response, SHDC has not sought directly the views of the public or local interest groups as to any particular matters that should be reflected in the EIA Scoping Response.

This representation sets out in the first section the relevant local planning policy and comments upon the EIA Scoping Report submitted by the Applicant, the second part Appendix A includes the Landscape and Visual comments from AAH Landscape Consultants and Appendix B provides the comments in full of the Councils internal departments.

Local Planning Policy Context

The Local Plan for South Holland comprises the South East Lincolnshire Local Plan 2011-2036 (SELLP) was adopted jointly by South Holland and Boston Borough Council on the 8 March 2019. The relevant policies within the South East Lincolnshire Local Plan 2011-2036 are:

- Policy 2 'Development Management'
- Policy 3 'Design of New Development'
- Policy 4 'Approach to Flood Risk'
- Policy 28 'The Natural Environment'
- Policy 29 'The Historic Environment'
- Policy 30 'Pollution'
- Policy 31 'Climate Change and Renewable and Low Carbon Energy'
- Policy 33 'Delivering a More Sustainable Transport Network'

SHDC Comments on EIA Scoping Report

General Comments

Regulation 10 (3) of the EIA Regulations provides the list of information that a request for a scoping opinion must include and SHDC agree that this has been provided within the Applicants EIA Scoping Report.

SHDC wishes to reiterate the importance of the site selection process. SHDC wishes to see a clear presentation of how NGET have reached a chosen design to take forward to EIA and DCO application, and how stakeholder feedback and environmental constraints and opportunities have fed into this process. SHDC expect to see the footprint of the project minimised as much as possible to avoid environmental impacts to sensitive receptors within South Holland.

SHDC notes the Applicant's desire to incorporate flexibility into their draft DCO and its intention to apply a 'Rochdale Envelope' approach for this purpose. Where the details of the Proposed Development are not defined precisely, the Applicant will

apply a worst-case scenario, as set out at paragraphs 4.6.7 and 5.2.5 of the EIA Scoping Report. The Applicant should explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. The development parameters will need to be clearly defined in the draft DCO and in the accompanying ES.

SHDC also notes that there is further design refinement work of the OHL route, locations of Pylons, construction compounds to be carried out. If the design refinement results in the OHL route, location of Pylons and their construction compounds being altered or move significantly within the Scoping Boundary, then effects scoped in or out should be reviewed. This should be considered as the EIA process develops.

Agricultural Land

Within SHDC's area the Agricultural Land effected is likely to be Grade 1 and 2 (source ALC Maps). At this stage of the project, it is unclear as to the extent of the loss of BMVAL within SHDC until the number of Pylons within the District and their location are determined and the extent of wayleaves required for the OHL including extent of agricultural use allowable below OHL.

SHDC wishes to see the minimisation of impacts whether short, medium, or long term upon the agricultural resource within the District, as per National Policy Statement for Energy (EN-1), minimisation of impact to Best and Most Versatile agricultural land. SHDC wishes to see any permanent loss of agricultural land minimised through the site selection and design phases.

SHDC expect the extent and nature of loss to be considered carefully along with the Grade of the agricultural land to be confirmed via Soil Surveys and that the handling, storage and reinstatement of soil should be carried out in accordance with a Soil Management Plan (SMP) which sets out good practice mitigation to minimise temporary adverse effects on the soil resource.

There is also the potential for adverse impacts to farming practices through the temporary loss of land availability, restricted access and disruption caused by temporary working areas and construction traffic, as well as to the soil resource itself. This should also be considered within the ES.

Landscape and Visual

The District Council have commissioned AAH Landscape Consultants to provide landscape and visual support for the WMEL Project. AAH Landscape Consultants have provided feedback and advice to the Council upon the EIA Scoping Report. A full copy of the report prepared by AAH Landscape Consultants is attached at Appendix A which has reviewed the EIA Scoping Report. Appendix A should be read in conjunction with and taken as part of the District Councils EIA Scoping Response.

Air Quality, Noise and Vibration

We agree that air quality, noise and vibration should remain in scope. Depending on the exact proposals, artificial light impact should remain in scope for the development phase in terms of security lighting at compounds and access points where this has the potential to impact on residential receptors.

Where the route passes close to noise receptors, an assessment of the operational noise impact will be required.

Cultural Heritage

SHDC are pleased to see that direct impacts upon Designated Heritage Assets are to be avoided via the final design including the final alignment of the OHL.

There are however, a number of Designated Heritage Assets that are within close proximity such that the impact upon setting will need to be carefully considered particularly:

- Pinchbeck Engine and Pump
- 41 Church Street Pinchbeck
- Wykeham Chapel scheduled monument,
- Moated site of monastic grange with adjacent earthworks at Rigbolt House scheduled monument.
- Church Cross St Mary's Churchyard
- Moated site of Newhall Grange scheduled monument

SHDC welcomes that these Heritage Assets have been identified within the EIA Scoping Report.

Socio-Economic

Careful consideration should be given to the impacts upon socio economic receptors including PROW, Residential Properties and Local Businesses and the Council consider that the communities affected by the scheme should also be the ones who benefit from any community benefit funds.

Construction Activities

SHDC would welcome the submission of a detailed construction and environmental management plan and supporting documents in due course, to reduce impacts to vulnerable receptors from noise, dust, artificial light from temporary site lighting/vehicle driving & working lights and any other more permanent fittings for the duration of the project and emissions from all sources related to the project. This should include the steps to be taken to achieve the reduced impact and details of compliance monitoring to ensure those steps taken are effective.

Cumulative Impacts

SHDC welcomes confirmation at paragraph 5.5.2 that a CEA will be carried out. SHDC consider that such an assessment as well as considering the cumulative effects of the environmental topics also it will need to pay particular attention to:

- The potential for G to W Construction particularly the Weston Marsh Substations (but not limited too) construction activities to coincide with the construction of WMEL.
- Visual effect of the OHL/Pylons with other NSIPS particularly with the OHL and Substations at Weston Marsh of the G to W Scheme.

The ES should include all different types of development which may lead to a cumulative impact, not just those which are similar in nature to the Proposed Development. SHDC expect to be consulted upon the scope of projects to be included with the CEA as part of the ES.

Conclusion

This document provides comments by South Holland District Council on the Weston Marsh to East Leicestershire Environmental Impact Assessment Scoping Report (November 2025), requested by the Planning Inspectorate on the 7th November 2025 (Reference EN 0210007).

If you have any queries, please do not hesitate to contact the case officer [REDACTED]
[REDACTED] Many Thanks

Yours Faithfully

[REDACTED]

[REDACTED]

Nationally Significant Infrastructure Projects Manager

Enc. Appendix A & B

Technical Memorandum 1: AAH TM01

South & East Lincolnshire Councils Partnership; Weston Marsh to East Leicestershire Project; Landscape and Visual Scoping Opinion

This Review has been carried out by AAH Consultants (AAH) on behalf of South & East Lincolnshire Councils Partnership (SELCP) and relates to landscape and visual issues and elements only. It is based upon a review of the relevant sections of the following Weston Marsh to East Leicestershire scoping documents, downloaded from:

<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0210007/documents>

- *Weston Marsh to East Leicestershire*; Environmental Impact Assessment Scoping Report; November 2025

While the focus of this review is on Landscape and Visual matters within the authority boundary of SELCP, other information provided within the Scoping Report, and any associated Appendices, has also been considered, providing background and context to the site. As the project is at an early stage, the Order Limits have yet to be defined, with the information presented within the applicants Scoping Report based on a *Scoping Boundary*. Paragraph 3.7.1 clarifies that to “*retain flexibility, a Scoping Boundary has been defined based on the new overhead line emerging preferred corridor, the new Weston Marsh substation infrastructure Siting Zone, the new WMEL-A and WMEL-B substation preferred Siting Areas, and an assumed area around the existing ZA overhead line to allow for reconductoring works.*”. The Scoping boundary has subsequently been used to consider the potential effects to define the scope of the EIA, as clarified in paragraph 3.7.2

We have assumed this has been defined to represent the maximum extent of potential development, and we understand that the Scoping Boundary will also undergo refinement and subsequently be replaced by the Order Limits as the scheme progresses.

Therefore, due to this iterative process of refinement, there will need to be further consultation with the applicant in regards to agreeing the final content and detail of the landscape and visual elements of the submission, particularly if the alignment of the scheme differs greatly from that identified within the Scoping Boundary Area.

The scheme is broken down into five sections in the scoping report, which provides a useful structure to navigating the scheme descriptions etc. Due to the geographical scope of our review, our focus is likely to be primarily on section one, being located within South Holland as presented on Figure 1.1 of the Scoping Report. However, any wider visual effects from Section 2 experienced within the district will also be considered. From experience on similar linear infrastructure projects in the region, we assume the ES is also proposed to be written to consider each separate stage as a stand alone report. This does assist in any future reviews and consultation allowing for the particular interests in this region to be focussed upon, and if this is the case, we request that repetition in the reports created for each stage is kept to a minimum, and common sections are referenced, such as methodology, scheme description etc.

This aids the process when reviewing several sections at one time. Also, due to the volume of likely consultation information and extent of potential site visits to cover an extensive study area, we also request that we are afforded the maximum time available for this to aid us in providing suitable feedback.

We expect the production of Landscape and Visual chapters to be included within the Environmental Statement (**ES**), which would be in the form of separate Landscape and Visual Impact Assessments (**LVIA**), which should, along with any supporting information (such as plans, photographs, visualisations or figures), reflect current best practice and guidance from, as a minimum, the following sources:

- ‘*Guidelines for Landscape and Visual Impact Assessment*’, (**GLVIA3**), April 2013 by the Landscape Institute (**LI**) and Institute of Environmental Management and Assessment (**IEMA**);
- ‘*An Approach to Landscape Character Assessment*’, Natural England (2014);
- ‘*Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals*’, 17th September 2019 by the Landscape Institute (**LI**);
- ‘*Technical Guidance Note (TGN) 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)*’, 10th January 2020 by the Landscape Institute (**LI**);
- ‘*Technical Guidance Note (TGN) 04/20 Infrastructure*’, April 2020 by the Landscape Institute (**LI**);
- ‘*Technical Guidance Note (TGN) 2/21 Assessing landscape value outside national designations*’, May 2021 by the Landscape Institute (**LI**); and
- ‘*Technical Guidance Note (LITGN) 2024-01 Notes and Clarifications on Guidelines for the Landscape and Visual Impact Assessment Third Addition (GLVIA3)*’, August 2024 by the Landscape Institute (**LI**);

Overall, we would expect that the assessment of potential Landscape and Visual effects and evolving proposals relating to the scheme, as a Nationally Significant Infrastructure Project (**NSIP**), follow an iterative process of engagement and consultation to ensure the following are not fixed at this stage and are discussed, developed and agreed at subsequent technical meetings with SELCP and other appropriate stakeholders:

- LVIA Methodology;
- Development, and subsequent ZTV, parameters;
- Study Area extents (distance);
- Viewpoint quantity and locations;
- Photomontage/Accurate Visual Representations (**AVRs**):
 - Quantity and location;
 - Phase depiction;
 - AVR Type and Level.
- Mitigation Measures/Landscape Scheme/Site Layout;
- Cumulative effects, including surrounding developments to be considered; and
- The extent as to which a Residential Visual Amenity Assessment (**RVAA**) or initial Survey should be considered (based on the Landscape Institute TGN

2/19) if there are residential properties with receptors likely to experience significant effects to their visual amenity.

It is noted that in the Scoping Report, Landscape and Visual are proposed as separate chapters, and we have assumed this will be carried forward into the ES. This is fine, and while interrelated, the landscape and visual effects should be assessed separately.

We have reviewed the Scoping Report, and the following should be considered in the evolving assessment and layouts:

Methodology

As stated previously, the LVIA should be carried out in accordance with GLVIA3 and associated guidance, and undertaken by suitably qualified personnel. The overview of the proposed methodology provided at paragraphs 6.8.2 to 6.8.25 (Landscape Methodology) and 7.8.2 to 7.8.25 (Visual Methodology) are typical of those used for ES Chapters where potential significant effects can be considered and reflects the guidance in GLVIA3. We would request that the most up to date technical guidance be used and the full methodology for both Landscape and Visual assessments is provided to allow further interrogation and comment at the next phases of the project.

Table 6.5 Significance of landscape effect and Table 7.5 Significance of visual effects presents criteria for the levels of landscape and visual effect and paragraphs 6.8.22 and 7.8.18 clarify that “*effects rated as being of moderate or major will be considered to be significant, and negligible and minor effects will be considered not significant.*”. This is aligned with the approach of similar schemes in the region, and therefore acceptable.

Professional judgement is promoted throughout the Methodology, which is aligned with GLVIA 3; however, it is important that the application of professional judgement be explained and transparent throughout. This is particularly important where the significance of Moderate effects is assessed, particularly where these Moderate effects are judged to be Not-Significant by the author.

One point of note, regarding construction impacts made at paragraph 7.7.3; There is a statement in regards to temporary clearance of vegetation and alteration of landform. These are not temporary actions – vegetation removal is permanent unless the intention is to translocate. It is accepted that new planting may be proposed to mitigate or replace planting lost, but we would deem any removal permanent.

Scope of the Study Area

It is acknowledged in Sections 6.4 and 7.4 that an initial study area of has been allowed for due to the potential extensive views possible of the 400 kV overhead line, associated temporary works, and new substations; the Weston Marsh substation and the proposed substations at Corby Glen and west of Ab Kettleby. An initial 3km Study Area has been used for both the Landscape and Visual assessments,

measured from the edge of the Scoping Boundary. This study area and Scoping Boundary is illustrated on Figures 6.1 and 7.1.

It is further acknowledged in both chapters that visibility may occur beyond the 3 km Study Area; however, the Scoping Report indicates that at greater distances, separation and intervening landform/vegetation are likely to limit the potential for significant Landscape or Visual effects.

At this early stage, we recommend that these extents are discussed and reviewed further, as the full extent of potential visibility remains subject to design refinement and detailed ZTV modelling. The Scoping Report confirms that the Study Area will be reviewed and refined at the assessment stage based on the Order Limits, updated ZTV modelling, and targeted field survey, to ensure it remains proportionate and focused on potential for significant effects.

Once the study area has been defined, the LVIA should also provide a justification for the full extent/distance, which would be further refined as part of the iterative process.

Landscape

The landscape baseline and a range of published landscape character assessments have been identified in *Section 6.5*. Further detail on these character areas is provided in paragraphs 6.5.6 to 6.5.29, which describe the relevant Designations, National Character Areas, Regional Landscape Character Types and Local Landscape Character Assessments applicable across the five Sections of the Scoping Boundary.

However, as the scheme progresses and designs are refined, we recommend these are reviewed. To align with GLVIA3 the LVIA should include an assessment of landscape effects at a range of scales and needs to include both relevant published landscape character assessments and the LVIA authors own judgements of the landscape character of the site and study area should this vary from published assessments.

The future Baseline is covered in paragraphs 6.5.30 and 6.5.31. We would note this is a landscape under increasing pressure from development, in particular renewable energy schemes at an NSIP scale, as well as associated energy infrastructure upgrades including pylons and overhead lines, substations and converter stations.

Visual

The visual amenity baseline is considered from paragraph 7.5.3, which identifies a range of initial visual range of receptors covering residents, users of Public Rights of Way (PRoW), users of promoted recreational routes, users of local recreational facilities, road and rail users and visitors to publicly accessible land across the five Sections of the Scoping Boundary.

However, at this early stage of the project we request these be reviewed, refined and consulted upon further once proposals have been developed: we are not in a position to confirm their inclusion or omission at this stage.

We would expect that the visual assessment would clearly identify the visual receptors, which would subsequently be the focus of the visual assessment. The LVIA should not just contain an assessment of any agreed viewpoints, it must focus on receptors. The viewpoints are to illustrate the visual effects, and the visual assessment should clearly reference receptors to representative viewpoints to aid this.

The visual assessment should take account of the 'worst case scenario' in terms of maximum parameters and winter views, including effects at construction, Operational Phase (year 1), Residual Phase with mitigation planting having established (10 to 15 years), and at the Decommissioning Phase.

This scheme will likely have extensive adverse visual effects through introducing overhead lines and pylons, as well as any associated infrastructure. This is a very open and flat landscape well served by PROW and local roads. The proposed development is of a large scale, covering an extensive and visible area; therefore appropriate and successful visual mitigation through planting is both difficult to achieve in this context, but also could in itself cause adverse effects through foreshortening views or appearing out of character. The alignment and appearance of the scheme is therefore a key consideration in reducing adverse effects.

Viewpoints and Photomontages

At this early stage, no viewpoints to represent views from visual receptors have been identified. Therefore, due to the evolving design, the final locations of viewpoints are to be reviewed and subsequently agreed with SELCP and other relevant stakeholders. The final viewpoint selection should consider views of taller and more conspicuous elements, once the scheme layout is more developed, as well as consider potential key, or sensitive, viewpoints and visual receptors. We would welcome an initial discussion and subsequent workshop (on site if appropriate) with the applicant team in regards to proposed viewpoints.

To gain an understanding of the visibility of the scheme and how the development would appear in the surrounding landscape, Photomontages/AVRs should be produced. The number and location of the agreed viewpoints to be developed as Photomontages/AVRs should be agreed with SELCP and other relevant stakeholders and produced in accordance with *TGN 06/19 Visual Representation of Development Proposals*. At this stage, it is deemed appropriate that these should be produced to illustrate the proposals at different phases: Existing Situation (baseline), Operational (year 1) and Residual with planting established (10 to 15 years). The Photomontage/AVR Level and Type, as well as which viewpoints would be developed as photomontages, is to be discussed and agreed.

Cumulative impacts

Paragraphs 6.8.23 and 7.8.19 cover Cumulative landscape and visual effects. Cumulative Landscape and Visual effects should be assessed in regards to other major developments, and in particular similar energy infrastructure or renewable energy developments, as appropriate in regards to proximity and scale. This should consider both Combined (in same view) or Sequential (when the observer has to move to another viewpoint to see the same or different developments) effects. Cumulative effects of multiple energy infrastructure schemes across the region, and particularly in this area, are of particular concern, and we would expect a wider consideration of these schemes be considered in any cumulative assessment, as well as an assessment as to how the future baseline will likely be changed through introduction of these schemes.

Due to the scale and extent of the scheme, as well as ongoing development in the region, including other National Grid projects, large NSIP scale solar and BESS, other renewable energy schemes, as well as other energy infrastructure, we have a concern in regards to the cumulative effect across both the district and wider region. The East Midlands region is undergoing an unprecedented change from energy infrastructure and generation, in a short timescale. The region shares several key landscape characteristics that span district, regional and national character area, such as being predominantly flat to gently undulating agricultural/rural area, with big skies and sense of openness and tranquillity. This is a concern in both landscape terms through a change in land use, and also visually through the introduction of more industrial scale elements in open views. This should be considered within any LVIA.

Residential Visual Amenity

Paragraph 7.8.22 to 7.8.25 consider Residential Visual Amenity and potential for any Residential Visual Amenity Assessment (**RVAA**). This section proposes that only residents within a 150m Study Area be considered in regards to any RVAA. At this stage as it is currently unclear if there are residential properties with receptors likely to experience significant effects to their visual amenity. While we agree that any RVAA study area should be appropriate, if there are potential significant effects, due to the scale of some of the above ground elements of the scheme, these may ultimately meet the visual amenity threshold and an RVAA, based on the Landscape Institute TGN 2/19, and properties beyond a 150m study area may be required. The scale of the scheme has the potential to give rise to significant effects to local residents, including effects on resident's private visual amenity. The layout should also respond to potential views and proximity to any properties to mitigate any potential adverse effects.

Mitigation and Layout

As this is an iterative process, at this stage it is not relevant to comment on any potential mitigation or layout of the development. However, best practice guidance,

relevant published landscape character assessment's and Local and County Council Policy and Guidance shall be referred to and implemented as appropriate.

We would also expect any landscape and planting scheme is coordinated with other relevant disciplines, such as ecology, heritage or civils (e.g. SuDS features), to improve the value of the landscape and reflect appropriate local and regional aims and objectives. Planting should be well considered and not just placed to screen proposals, as this may have an adverse effect such as appearing out of character or foreshortening open or panoramic views in this open landscape. A Landscape Scheme and associated Outline Landscape and Ecological Management Plan should accompany the ES which should cover as a minimum the establishment period, which is assumed would be up to 15 years to cover the period up to the residual assessment.

The management plan should provide for both new planting and existing retained vegetation and how it will be managed and protected through all phases of the development. Any vegetation loss to facilitate development, including access and wider highways works or abnormal vehicular routes for construction, must be clearly identified in the submission.

██████████ CMLI
AAH Landscape

██████████ [@aahconsultants.co.uk](mailto:██████████@aahconsultants.co.uk)
www.aahconsultants.co.uk

02 December 2025

Appendix B – Comments

Weston Marsh to East Leicestershire (WMEL) – EIA Scoping Consultation under the Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11.

SHDC has gathered comments from internal departments in response to the WMEL EIA Scoping Report.

The full list of comments is as follows:

- Planning Policy - A relatively small part of this project is within SHDC. The proposed substations are outside SHDC and the Weston Marsh substations are being delivered via a different project. Therefore the impact of this project on SHDC is the approximately 12 km of overhead pylon route. The most impactful is the section between Pinchbeck and Surfleet where the route appears to be close to the built up area of Surfleet and the scattered dwellings between Surfleet and Pinchbeck.

The SA Scoping includes the following chapters: Chapter 6 Landscape, Chapter 7 Visual, Chapter 8 Ecology and Biodiversity, Chapter 9 Cultural Heritage Chapter, 10 Water Environment, Chapter 11 Geology and Hydrogeology, Chapter 12 Agriculture and Soils, Chapter 13 Traffic and Transport, Chapter 14 Air Quality, Chapter 15 Noise and Vibration, Chapter 16 Socio-economics, Recreation and Tourism, Chapter 17 Health and Wellbeing, Chapter 18 Climate Change Chapter, 19 Major Accidents and Disasters.

In addition the maps submitted with the SA Scoping appear to include relevant constraints and other information covered in the chapters listed above. These are the usual subject areas and cover the likely impacts the proposal will have.

The Visual chapter refers to Surfleet. It might be worth mentioning that a housing estate for 48 units has recently been completed on Land off Sunnydale Close, Surfleet close to the route. Also in this location is a listed building that is shown on the maps. The impact will need checking once pylon positions are chosen.

It therefore appears that the relevant issues will be covered in the SA and the relevant technical specialists can add to that and critique the output once it is published in the SA.

- Environmental Health - Please note that these comments only apply to the route 'Weston Marsh-South Forty Foot Drain'. Information relating to other sections has not been reviewed or considered.

We agree that air quality, noise and vibration should remain in scope. Depending on the exact proposals, artificial light impact should remain in scope for the development phase in terms of security lighting at compounds and access points where this has the potential to impact on residential receptors.

We would welcome the submission of a detailed construction and environmental management plan in due course, designed to reduce impacts to vulnerable receptors from noise, dust, light and emissions. This should include the steps to be taken to achieve the reduced impact and details of compliance monitoring to ensure those steps taken are effective. When work is ongoing close to residential receptors, it may

be necessary to consider breaks in the proposed working hours (currently 7 days per week) to allow for some impact free days.

Where the route passes close to noise receptors, an assessment of the operational noise impact will be required.

- Ecology – No comments received
- Heritage – No comments received
- Trees – No comments received.

The County Council will comment upon Archaeological matters, Flood Risk and Drainage as the Lead Local Flood Authority and Highways as the Highway Authority.

Our ref: 25_33734_P2nd December 2025**Your ref:** EN0210007

Dear Weston Marsh to East Leicestershire team,

Weston Marsh to East Leicestershire – EIA Scoping Consultation

Thank you for your consultation on the above application.

A small part of the proposed development is within the Internal Drainage District (IDD) of the South Holland Internal Drainage Board (IDB). Our comments relate only to the part of the development within this geographical area, which will include the Weston Marsh substation and works between this substation and the River Welland. The Board's Byelaws apply in this area.

Whilst the Board's regulatory process (as set out under the Land Drainage Act 1991 and the Board's Byelaws) is separate from planning, the ability to implement a planning permission may be dependent on the granting of any required Land Drainage Consents.

The Board will work with the applicant to discuss the requirement for land drainage consents.

Scope of the Environmental Impact Assessment (EIA)

The Board supports the applicant's proposal to undertake a flood risk assessment, as a part of the EIA.

We note that (within Section 10 – Water Environment of the Scoping Report) the applicant has identified watercourses as receptors for several potential impacts from construction and operation, including physical disturbance and change to flow regime. We agree that it is appropriate that most of these potential impacts are scoped into the EIA, as proposed.

We highlight that the Board will consider impacts of proposed construction and operational activities on drainage infrastructure (including watercourses and pumping stations) as part of the process of consenting any such activities that require Land Drainage Consent (e.g. discharge of water to a watercourse, alteration of a watercourse, and works within 9m of a watercourse).

Further, the Board supports the applicant's commitment to develop a Surface Water Drainage Strategy for the substations (within the Flood Risk Assessment) to ensure surface water flooding is not increased

Constituted by The Anglian Water Authority (South Holland Internal Drainage District) Order 1974,
Statutory Instrument 1974 No.1209. Reconstituted in 1993. Statutory Instrument 1993 No.453.

www.wlma.org.uk

as a result of the project. The Strategy should be supported by infiltration test results as required. The Board welcomes liaison with the applicant to ensure surface water drainage design adequately attenuates and treats runoff from the project.

Cumulative impacts with other developments

The Board notes that the proposed WEML project is one of several national infrastructure projects planned for the South Holland area within the next few years. We consider it is imperative that the applicant undertakes a thorough assessment of the potential cumulative impacts of this project on land drainage receptors with the other planned projects, namely Outer Dowsing Offshore Wind, Meridian Solar and Grimsby to Walpole – all of which converge at Weston Marsh.

Yours sincerely,

A solid black rectangular box used to redact the signature of the National Infrastructure Officer.

National Infrastructure Officer
Water Management Alliance

Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol.
BS1 6PN

Our Ref: S25/2212
Your Ref: EN0210007

5 December 2025

Scoping Opinion consultation in relation to an application by National Grid Electricity Transmission plc (NGET) (the applicant) for an Order granting Development Consent for the Weston Marsh to East Leicestershire (the proposed development)

Dear Katie,

Thank you for your letter dated 7 November 2025 seeking South Kesteven District Council's (SKDC) views and comments on the Scoping Report produced by National Grid and the content of the Environmental Statement for the above proposal.

The Council has reviewed the information contained within the Scoping Report and offers the following comments which we request the Inspectorate considers in preparation of its final Opinion.

Alternative options	• This section of the ES must clearly demonstrate how alternative options have been considered to minimise the visual and environmental impact of the proposed scheme. • This should include the routing and design of the proposed scheme, as well as consideration of undergrounding in sensitive areas.
Landscape	• Agree with the summary of concerns raised by SKDC through the phase 1 consultation in table 6.1 • Viewpoints must be agreed with the Council as part of any LVIA process • The Council will work with the developer to provide a list of relevant developments that need to be considered as part of any cumulative impact assessment. This will be a working document that will be subject to change over time. • Recommend the potential impacts on Grimsthorpe Castle RPG during the construction phase are scoped in • Query whether 3km from the order limits is sufficient to fully assess landscape effects



SOUTH
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Visual	• Agree with visual effects on PrOW users within study area being scoped in during both construction and operation phases • Agree with scope of residential receptors to be assessed for visual effects
Ecology and Biodiversity	• It is not completely clear why the impacts on nesting birds would be scoped out of the operational phase, which could have significant effects
Historic Environment	• As above, recommend the potential impacts on Grimsthorpe Castle RPG during the construction phase are scoped in • The effects of the proposal on the setting of designated heritage assets and historic landscapes should be scoped into the assessment
Water environment	• No comments regarding suggested scope of assessment would defer to Lincolnshire County Council (as lead local flood authority) in this respect
Geology and Hydrogeology	• No comments regarding suggested scope of assessment
Agriculture and Soil assessment	• Land and Soils in EIA Guide published by IEMA on 17th February 2022 should be considered in the assessment. • Impact of the proposal on BMV should include potential cumulative impacts through associated renewable schemes that the proposal could facilitate
Traffic and transport assessment	• No comments regarding suggested scope of assessment would defer to Lincolnshire County Council (as local highway authority) in this respect
Air quality assessment	• No comments regarding suggested scope of assessment
Noise and vibration assessment	• Noise monitoring of construction traffic routes should be carried out. • Scope of study area for operational noise assessment should be agreed with SKDC environmental protection
Socioeconomics, Recreation and Tourism assessment	• Second Edition of the IEMA GHG in EIA Guide to be issued week commencing 28th February and should be used in the assessment. • While there are no proposed closures, the indirect effects on PrOW users within study area should be scoped in during both construction and operation phases
Climate change	No comments regarding suggested scope of assessment



I trust the above comments are of assistance and should you need clarification on any of the matters please do not hesitate to contact me.

Yours sincerely

[REDACTED]

Development Management & Enforcement Manager



SOUTH
KESTEVEN
DISTRICT
COUNCIL

From: clerk@suttertonparishcouncil.gov.uk <clerk@suttertonparishcouncil.gov.uk>
Sent: 04 December 2025 15:50
To: Weston Marsh to East Leicestershire
<westonmarshtoeastleics@planninginspectorate.gov.uk>
Subject: Re: EN0210007 - Weston Marsh to East Leicestershire - EIA Scoping and Consultation and Regulation 11 Notification

You don't often get email from clerk@suttertonparishcouncil.gov.uk. [Learn why this is important](#)

Good afternoon,

Re: EN0210007 - Weston Marsh to East Leicestershire - EIA Scoping and Consultation and Regulation 11 Notification

The above was discussed at the meeting of Sutterton Parish Council on the 3rd December 2025.

The Cllr's have no comments at this time.

Kind regards,

[REDACTED]

[REDACTED], Sutterton Parish Clerk & RFO

E-Mail: clerk@suttertonparishcouncil.gov.uk - please note e-mails will be checked after 2pm Tuesday to Friday

Tel: [REDACTED] please note telephone calls received before 2pm Monday to Friday will be left to go to answerphone. Please leave a message and I will get back to you.

From: [REDACTED]@forestrycommission.gov.uk>

Sent: 02 December 2025 17:17

To: Weston Marsh to East Leicestershire

<westonmarshtoeastleics@planninginspectorate.gov.uk>

Subject: Weston Marsh to East Leicestershire - EIA Scoping Consultation - EN0210007

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Thank you for consulting the Forestry Commission on this proposal.

As a Non-Ministerial Government Department, the Forestry Commission provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland.

We note from the documents that there are 31 Ancient Woodlands within the scoping boundary, 16 veteran trees and 1 ancient tree, although more may be discovered during site surveys. We also note the commitment to buffer zones of at least 15m for Ancient Woodland and that there will be no infrastructure within ancient woodlands or oversailing of cables.

We also note that some of the substation siting areas are adjacent to Ancient Woodland. Area WMEL-A21.B also contains some woodland that was either established or managed with the aid of grant funding. There are also numerous fragmented areas of mixed deciduous woodland within and adjacent to the scoping area.

Ancient Woodland:

Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed.

Section 5.4.32 of EN-1 – The Overarching National Policy Statement for Energy states:

“Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both the construction and operational phases”

We would particularly refer you to further technical information set out in Natural England and Forestry Commission’s [Standing Advice on Ancient Woodland](#) – plus supporting [Assessment Guide](#) and [“Keepers of Time” – Ancient and Native Woodland and Trees Policy in England](#).

The Standing Advice states that proposals should have a buffer zone of **at least** 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. For example, the effect of air pollution from development that can result from a significant increase in traffic or dust from construction.

For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be **at least** 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area.

The Standing Advice and the recommended buffer zones are currently under review and are likely to be updated recommending that the minimum buffer requirement will be increased.

Where possible, buffer zones should contribute to wider ecological networks and be part of the green infrastructure of the area. They should consist of semi-natural habitats such as including woodland, scrub, heathland and wetland.

There is a need to consider both the direct and indirect impacts resulting from construction. Direct impacts can include, but are not limited to, damaging or compacting soil, damaging functional habitat connections and changing the woodland ecosystem by removing the woodland edge or thinning trees. Indirect impacts can also include reducing the amount of semi-natural habitats next to ancient woodland, increasing the amount of dust, light, air or soil pollution or changing the hydrology of a site.

Due to the irreplaceable nature of ancient woodland and ancient and veteran trees, most temporary effects will result in irreplaceable damage.

We would expect to see a detailed assessment of any impacts to the ancient woodlands, including details of measures to be taken to reduce and mitigate any effect.

Mixed deciduous woodland – Priority Habitat:

Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England).

They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 “Duty to conserve and enhance biodiversity” and Sect 41 – “List of habitats and species of principle importance in England”.

Section 5.11.27 of EN-1 of the Overarching National Policy Statement for Energy states:

“Existing trees and woodlands should be retained wherever possible.....The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long term management and maintenance of newly planted trees should be secured”

Fragmentation is one of the greatest threats to mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through loss of connectivity, damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic or dust, particularly during the construction phase of a development.

For any woodland within the development boundary, land required for temporary use or land where rights are required for the diversion of utilities, the Root Protection Zone must be taken into consideration. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy.

Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals) and fencing off these areas to prevent unintended incursions into the root protection zone as well as dust prevention measures to reduce any potential impact of dust pollution.

Grant Funded Woodland:

There is one small area within one of the proposed substation sites that shows on our map system that it was established or managed with the support of public money in the form of the Farm Woodland Premium Scheme (FWPS). These will need to be assessed to check the status of these grants.

They appear to still be in 'obligation'. The obligation period can last for up to thirty years from the date the first instalment of grant was paid. The landowner is expected to meet all of the Terms and Conditions of the agreement contract. Failure to do so is likely to require the Forestry Commission to seek to recover all of the relevant grant that has been paid to avoid public money being wasted.

Any further sites that were in receipt of grant funding can be checked using the Forestry Commission mapping tool.

Net Deforestation and Tree Planting:

It is expected that there will be thorough assessment of all trees within the project boundary to identify any ancient or veteran trees in line with good arboricultural practice (BS 5837), also to assess any net loss of trees and the development of mitigation measures to minimise any risk of net deforestation because of the scheme. A scheme that bisects any woodland, will not only result in a significant loss of woodland cover, but will also reduce the ecological value and natural heritage impacts due to habitat fragmentation which will have a negative impact on its ability to respond to the impacts of climate change.

Hedgerows, individual trees and woodlands within a development site should also be considered in terms of their overall connectivity between woodlands affected by the development.

Where woodland loss is unavoidable, we would expect to see significant compensation and the use of buffer zones to enhance the resilience of neighbouring woodlands. These zones should include further tree planting or a mosaic of semi-natural habitats.

Perhaps with the creation of some larger woodland blocks and hedgerow/hedgerow trees between existing woodland blocks, to link them and ensure maximum gains to increase habitat connectivity, making woodlands more resilient and to benefit biodiversity across the whole site. Ideally we would like to see woodland creation to be carried out in 5ha blocks or that connecting planting with existing woodlands, should create blocks of at least 5ha.

With the Government aspiration to increase tree and canopy cover to 16.5% of land area in England by 2050, The Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss. However, there are a number of issues that need to be considered when proposing significant planting schemes:

The species and provenance of new trees and woodland needs to be considered to ensure a resilient treescape which can cope with the full implications of a changing climate. The biosecurity of all planting stock also needs to be considered to avoid the introduction of pests and diseases, particularly in areas near ancient woodlands.

Use of the Forestry Commission Ecological Site Classification Tool (ESC) can assist with selection of tree species that are ecologically suited to particular sites and includes climate change predictions to allow for future suitability and woodland resilience.

Plans should also be in place to ensure the long term management and maintenance of new and existing woodland. We would recommend the creation of a UK Forestry Standard compliant management plan for all new and existing woodland on site, including deer and squirrel control. Access also needs to be considered for future management.

If you require any further information, please do not hesitate to contact me.

Best wishes

[Redacted]

[Redacted]

Local Partnership Advisor

East & East Midlands

Tel: [Redacted]

[Redacted] [@forestrycommission.gov.uk](mailto:[Redacted]@forestrycommission.gov.uk)



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This email has been scanned for viruses and malware.

From: Moulton Parish Council <clerk.moulton@gmail.com>

Sent: 07 November 2025 13:34

To: Weston Marsh to East Leicestershire

<westonmarshtoeastleics@planninginspectorate.gov.uk>

Subject: The Moultons

Dear Planning Inspectorate,

I have a very worried parish currently. We are a community of farmers mainly in a conservation area. The roads in and around the villages are already not fit for the volume of traffic as can be seen with the large amount of potholes and lack of funding for our county.

We are not far from Fosdyke where the Wash comes in and many sea birds and wildlife come in land into our parish at various times of the year. We have a vast array of in land wildlife including many swans, geese and deer and the public are worried how it would affect all these.

The roads are clearly not fit for the extra traffic that would be caused during the construction phase.

The land is prime agricultural land (I know this as my husband personally farms many hundreds of acres), it is difficult for us to purchase more as it is in such short supply in the area. Taking up more valuable land would mean more farmers would be fighting over it.

We have many residents concerned about property prices and how much they would devalue, the worry of noise/vibration pollution has also been voiced by residents on numerous occasions.

We know more electricity is needed in the country but you can clearly see this is not the answer and it all needs to be rethought.

Kind Regards

[REDACTED]

Parish Clerk.

Moulton's Parish Council

Tel: mob [REDACTED]

E-mail: clerk.moulton@gmail.com

<http://parishes.lincolnshire.gov.uk/moulton>

From: [REDACTED]@trinityhouse.co.uk>

Sent: 04 December 2025 09:56

To: Weston Marsh to East Leicestershire

<westonmarshtoeastleics@planninginspectorate.gov.uk>

Cc: [REDACTED]@trinityhouse.co.uk>

Subject: RE: EN0210007 - Weston Marsh to East Leicestershire - EIA Scoping and Consultation and Regulation 11 Notification

You don't often get email from [REDACTED]@trinityhouse.co.uk. [Learn why this is important](#)

Good morning Wing,

I can confirm that Trinity House has no comments to make concerning this matter.

Kind regards,

[REDACTED]

Navigation Services Manager | Navigation Directorate | Trinity House

[REDACTED]@trinityhouse.co.uk | [REDACTED]

www.trinityhouse.co.uk



TRINITY HOUSE



UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN0210007
Our Ref: 93975

Ms Katie Norris
Senior Environmental Advisor
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol BS1 6PN

1st December 2025

Dear Ms Norris,

Nationally Significant Infrastructure Project Weston Marsh to East Leicestershire EN0210007 Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we make the following comments:

Environmental Public Health

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be

covered elsewhere in the Environmental Statement (ES). We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*¹, setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES and the EMF report. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e., an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

Electric and Magnetic Fields (EMF)

It is noted that an EMF report will be prepared as part of the Project but separate from the EIA process. UKHSA expects the report to include an assessment of the possible health impacts of electric and magnetic fields associated with the development and further advice is available in the reference document - *Advice on the content of Environmental Statements accompanying an application under the Nationally Significant Infrastructure Planning Regime*¹.

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

¹

<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>

From: clerk@wotwatapc.org.uk <clerk@wotwatapc.org.uk>

Sent: 24 November 2025 16:07

To: Weston Marsh to East Leicestershire

<westonmarshtoeastleics@planninginspectorate.gov.uk>

Subject: RE: EN0210007 - Weston Marsh to East Leicestershire - EIA Scoping and Consultation and Regulation 11 Notification

You don't often get email from clerk@wotwatapc.org.uk. [Learn why this is important](#)

Dear Wing

Thank you for the opportunity to respond. The Parish Council discussed this application at their meeting held on Thursday November 20th and resolved that no further action was necessary.

Kind regards



Clerk to WOTWATA Parish Council



The views expressed by the author may not necessarily reflect the views or policies of Waltham on the Wolds and Thorpe Arnold Parish Council.

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EN0210007

To Whom It May Concern,

RE: Formal Objection to the Weston Marsh to East Leicestershire – Weston Parish, Lincolnshire.

We are writing to register our formal objection to the proposed **Weston Marsh to East Leicestershire**, including its associated infrastructure and cable corridors proposed to pass through Weston Parish and surrounding areas of South Lincolnshire. While Weston Parish Council recognise the national need for renewable energy, this particular proposal is deeply flawed and fails to comply with several statutory obligations set out in UK environmental, planning, and human rights law.

We have outlined below our main **planning, environmental, social, and legal objections** to this scheme.

1. Loss of Productive Agricultural Land

The proposal involves the development of energy infrastructure across high-grade, productive farmland that currently supports local and national food supply chains. This irreversible land use change contradicts national food security objectives and undermines the long-term sustainability of rural Lincolnshire's economy.

2. Visual, Environmental and Heritage Impact

Weston and the surrounding landscape include open rural vistas, historic villages, and designated heritage sites such as the Grade I listed Church of St Mary. The scale and industrial nature of the scheme—including substations, converter stations, and overhead/underground cabling—will severely degrade this landscape, harming local character and the setting of protected heritage assets.

3. Non-Compliance with Statutory Environmental and Planning Duties

A. Environmental Impact Assessment Regulations 2017

The Environmental Statement submitted for the scheme is fundamentally inadequate. It:

- Fails to properly assess the **cumulative environmental impacts** from this and similar regional infrastructure projects.

- Lacks robust analysis of impacts on **biodiversity, agricultural land, and landscape character**.
- Provides insufficient detail regarding mitigation measures for noise, visual disruption, and habitat loss.

This non-compliance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 renders the application legally deficient and should result in a refusal or requirement for resubmission with a comprehensive EIA.

B. Environment Act 2021 – Biodiversity Net Gain

There is no convincing evidence that the scheme will deliver the **legally required 10% biodiversity net gain**. In fact, the proposal involves habitat destruction, hedgerow removal, and significant disruption to local ecosystems. No credible or enforceable Biodiversity Gain Plan has been submitted, contravening the Environment Act 2021.

C. Planning Act 2008 – Duty to Consider Local Impact

Section 60 of the Planning Act 2008 mandates the decision-maker to meaningfully consider **Local Impact Reports** and representations from parish councils and local authorities. If the views of Weston Parish Council and local residents are not fully addressed in the decision-making process, this will amount to a breach of statutory duty.

D. Human Rights Act 1998

This proposal risks violating the rights of residents under:

- **Article 8** (right to respect for private and family life) – due to visual intrusion, construction disruption, and ongoing noise/disturbance.
- **Protocol 1, Article 1** (right to peaceful enjoyment of possessions) – particularly if land access or compulsory acquisition is sought.

Approval of this scheme without adequate mitigation or engagement constitutes a potential breach of the Human Rights Act 1998.

E. Climate Change Act 2008 (as amended 2019)

The scheme's **net environmental benefit is unproven**. The embedded carbon emissions from manufacturing, transport, land conversion, and long-term maintenance may outweigh the carbon savings claimed. This undermines the UK's statutory obligations under the Climate Change Act 2008 to meet legally binding carbon budgets and achieve net zero emissions by 2050.

4. Procedural Fairness and Community Engagement

The public consultation process has lacked transparency and meaningful engagement. A development of this scale demands early, accessible, and inclusive involvement with all affected communities. At present, the scheme appears driven more by developer convenience than genuine public interest.

For the reasons outlined above, Weston Parish Council objects to the current **Weston Marsh to East Leicestershire** on the grounds of:

- Non-compliance with statutory environmental, planning, and human rights duties,
- Irreversible harm to agricultural land and local heritage,
- Inadequate consultation and failure to address local community concerns.

The drive for renewable energy must not override legal duties, environmental protection, or the rights of rural communities. Weston Parish Council asks that you act to protect Weston Parish from this unjustified and harmful proposal.

Yours faithfully,



Clerk / RFO

For and on behalf of Weston Parish Council

-----Original Message-----

From: [REDACTED] Clerk and Responsible Financial Officer <clerk@wigtoft-pc.gov.uk>

Sent: 02 December 2025 09:06

To: Weston Marsh to East Leicestershire

<westonmarshtoeastleics@planninginspectorate.gov.uk>

Subject: EN02 1007

[You don't often get email from clerk@wigtoft-pc.gov.uk. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Good morning,

Your letter about the above proposals was discussed at the Parish Council meeting last night.

There were no comments to send you other than "it won't make any difference what we say, it will go ahead anyway therefore we have no comments".

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Kind regards,

[REDACTED]

Clerk to Wigtoft Parish Council

[REDACTED]

email: clerk@wigtoft-pc.gov.uk

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