

**THE NATIONAL GRID ELECTRICITY TRANSMISSION PLC (WESTON MARSH SUBSTATION
A) COMPULSORY PURCHASE ORDER 2026**

THE ELECTRICITY ACT 1989 AND THE ACQUISITION OF LAND ACT 1981

**STATEMENT OF REASONS OF THE ACQUIRING AUTHORITY FOR THE MAKING OF A
COMPULSORY PURCHASE ORDER FOR THE ACQUISITION OF LAND AND NEW RIGHTS TO
FACILITATE THE DELIVERY OF (WESTON MARSH SUBSTATION A) AND RELATED
CONNECTIONS**

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THE ELECTRICITY ACT 1989 AND THE ACQUISITION OF LAND ACT 1981

THE NATIONAL GRID ELECTRICITY TRANSMISSION PLC (WESTON MARSH SUBSTATION A) COMPULSORY PURCHASE ORDER 2026

STATEMENT OF REASONS OF THE ACQUIRING AUTHORITY FOR THE MAKING OF THE ORDER

1. INTRODUCTION

- 1.1 National Grid Electricity Transmission Plc (company registration number 02366977) ("**National Grid**") has made The National Grid Electricity Transmission Plc (Weston Marsh Substation A) Compulsory Purchase Order 2026, (the "**Order**") under Section 10 and Schedule 3 of the Electricity Act 1989 (the "**1989 Act**") and the Acquisition of Land Act 1981 (the "**1981 Act**").¹
- 1.2 This Statement of Reasons (the "**Statement**") is a non-statutory statement and is not intended to constitute the Statement of Case which National Grid will be required to prepare in accordance with the Compulsory Purchase (Inquiries Procedure) Rules 2007 in the event of an inquiry into the Order.
- 1.3 The delivery of Weston Marsh Substation A together with associated connections (the "**Scheme**") is one which seeks to reinforce the network and to deploy additional boundary capability through new projects, and to facilitate the connection of the Outer Dowsing Offshore Wind Farm ("**ODOW**") onto the electricity transmission network. As part of the connection agreement between the National Energy System Operator ("**NESO**") and ODOW (and therefore the reciprocal contractual agreement between NESO and National Grid), a connection point onto the National Electricity Transmission System ("**Transmission System**") must be made available by 2030.
- 1.4 National Grid considers that the best way to achieve the intended aim of the Scheme is to construct the new substation at the chosen location.
- 1.5 The Scheme will facilitate the connection of ODOW to the transmission network and will reinforce the network.
- 1.5.1 As part of the Scheme, it will be necessary to:
- (a) Construct a new Air Insulated Switchgear ("**AIS**") – 400kV Weston Marsh Substation A, associated landscaping and environmental mitigation works, drainage, highways and other associated works ("**Substation Works**")
 - (b) Construct new sections of overhead line to connect the existing 4ZM overhead lines into the new substation and removal of a section of existing overhead line ("**4ZM Overhead Line Works**")

¹ On 1 April 2019, the Electricity System Operator became a legally separate company within the National Grid Group. National Grid remains the transmission owner and operator and is responsible for the delivery of the Weston Marsh Substation Scheme.

- (c) Construct new sections of overhead line to connect the existing 2WS overhead lines into the new substation and removal of a section of existing overhead line ("**2WS Overhead Line Works**")
- (d) Undertake reconductoring works on the existing 4ZM overhead line and provide two spans of temporary overhead lines ("**Exempt Overhead Line Works**")

- 1.6 For the avoidance of doubt, this Statement and the justification for the Order, relates to the delivery of Weston Marsh Substation A and associated connections (including the 4ZM Overhead Line Works, 2WS Overhead Line Works and Exempt Overhead Line works and any necessary ancillary works) only.
- 1.7 This Statement sets out National Grid's justification for promoting the Order and explains why, in National Grid's opinion, there is a compelling case in the public interest for compulsory purchase powers to be confirmed.
- 1.8 If confirmed by the Secretary of State for Energy Security and Net Zero (the "**Secretary of State**"), the Order will enable National Grid to acquire compulsorily the land and rights included in the Order (the "**Order Rights**"). The Order Rights are required in order to deliver land rights to construct a new 400 kV Air Insulated Substation and new sections of overhead line to connect the existing overhead lines into the new substation.
- 1.9 This Statement is made having regard to all applicable non-statutory guidance relating to the promotion of compulsory purchase orders in England where the Order is to be confirmed by the Secretary of State.

2. THE WESTON MARSH SUBSTATION A

2.1 Location of the Scheme

- 2.1.1 The location of the Scheme was established through the multi-phased approach which informed the design of the overall Grimsby to Walpole DCO Project and the siting of the Weston Marsh Substation A and associated overhead line reconfigurations. The Grimsby to Walpole DCO Project is a 140km overhead line between North East Lincolnshire and North Norfolk, which includes the erection of six new substations which would include two located at Weston Marsh. The Grimsby to Walpole DCO Project is needed to reinforce the network and connect new sources of electricity planned in the area, including offshore wind, solar, gas-fired generation, interconnectors, battery storage and subsea links from Scotland.
- 2.1.2 The recent approval of the ODOW DCO confirms that the Weston Marsh area is essential in relation to grid connection and substation infrastructure. ODOW received confirmation from NESO in August 2023 that the confirmed grid connection for ODOW would be at Weston Marsh. The Order Limits for the ODOW DCO included land extending to and surrounding the Spalding Tee-Point at Weston Marsh to facilitate a connection to the transmission system, meaning that the suitability of this location for transmission connection infrastructure has already been assessed and accepted through the ODOW DCO examination and consenting process. Forthcoming projects such as the Weston Marsh to East Leicestershire and Ossian Wind Farm DCO proposals reinforce the need for the Scheme.
- 2.1.3 The Scheme is located within South Holland District in Lincolnshire, predominantly east of Marsh Road, approximately 3.5 km to the north of the village of Weston, 3 km north-west

of Moulton Seas End, and approximately 1 km east of the eastern bank of the River Welland ("**Order Land**").

- 2.1.4 The Order Land extends to 167.12 ha (including land to be permanently acquired and part which is subject of acquisition of permanent rights) and comprises predominantly flat, open agricultural land, punctuated by the existing 400kV 2WS and 42M overhead lines that form the Spalding Tee-Point. It is surrounded by a mixture of farmland and other power and energy related infrastructure, including the Spalding Tee Point. The Order Land is classified as Best and Most Versatile ("**BMV**") Agricultural Land (Grade 1).
- 2.1.5 The Order Land currently accommodates a number of agricultural enterprises operating across different land parcels. There are existing agricultural enterprises within the Order Land. The proposed haul road and associated infrastructure required for delivery of the Scheme will pass through parts of the existing operational farm holdings comprised in those agricultural enterprises.
- 2.1.6 The proposed location of the substation element of the Scheme is to the east of Marsh Road, east of Crowtree Farm on a site of approximately 8.4 ha. The dimensions for the main compound would be approximately 420 m by 185 m (approximately 8.4 ha including a 5 m buffer around the fenceline). An area of approximately 34.6 ha would be used for ecological mitigation at the west of the Order Land. The remainder of the land within the Order Land would be used temporarily during the construction period to facilitate the construction works.
- 2.1.7 The Order Land is located adjacent and to the east of the River Welland.
- 2.1.8 Public rights of Way ("**PRoW**") cross the Order Land. Surf/3/2 and Surf/3/3 are located to the north of the River Welland, running along the northern boundary of the River, providing public access between the River Glen and Fosdyke. Wstn/6/2 is located along the southern bank of the River Welland, providing equestrian access along the River Welland between Spalding and Fosdyke. Wstn/8/1 is a footpath which provides foot access from Wstn/6/2 across Crowtree Farm onto Marsh Road. This footpath links with Wstn/7/1 and Moul/2/1, enabling users to access through farmland between Marsh Road and Carrington Road
- 2.1.9 There are no statutorily designated ecological sites within the Order Land itself. However, several statutory designations are located within the area, which have been identified to understand the possible impacts from the proposed Scheme. The Wash Special Protection Area ("**SPA**"), Ramsar site and Site of Special Scientific Interest ("**SSSI**"), together with The Wash and North Norfolk Coast Special Area of Conservation ("**SAC**"), are located within 10 km of the Order Land. In addition, the Nene Washes SPA, Ramsar site and SSSI, designated in part for bird species with large foraging ranges, is located within 30 km of the Order Land.
- 2.1.10 The Order Land overlaps with the Surfleet Lows SSSI Risk Impact Zone and The Wash SSSI Risk Impact Zone. There are also several non-designated sites, including twelve Local Wildlife Sites ("**LWS**"), within 2 km of the Scheme, which are non-statutorily designated for their nature conservation value.
- 2.1.11 Twelve LWS are located within 2 km of the Scheme. Three are located within 0.2 km and were scoped in for further ecological impact assessment due to their close proximity to the Scheme and potential for impacts on them, as follows:
- (a) Surfleet Seas End Saltmarsh, located approximately 0.1 km to the west;
 - (b) Vernatt's Drain, located approximately 0.1 km to the west; and,

- (c) Surfleet Bank, located approximately 0.2 km to the west.
- 2.1.12 There are no Country Parks, areas of open access land, or Registered Parks and Gardens within 10 km of the Scheme.
- 2.1.13 There are 40 designated heritage assets within 2 km of the Scheme, comprising two scheduled monuments, four grade I listed buildings, 33 grade II listed buildings, and one conservation area. There are no World Heritage Sites, Registered Parks and Gardens or Registered Battlefields within 2 km. The nearest designated heritage assets, both located approximately 760 m to the south-west, are the Wykeham Chapel scheduled monument and the Grade I listed Wykeham Chapel of St Nicholas. The ruins of the Chapel of St Nicholas is also a designated Ancient Monument in the South East Lincolnshire Local Plan.

2.2 Description of the Scheme

- 2.2.1 The Scheme consists of a new 400 kV AIS substation ("**new Weston Marsh Substation A**"), and the removal of existing overhead lines and towers and creation of new, and modifications and reconductoring to, the existing 400kV overhead lines in the vicinity of the Spalding Tee-Point, Surfleet Seas End and Moulton Seas End.
- 2.2.2 In totality, the Scheme consists of various components of works in the Weston Marsh area, planned to be progressed via separate consenting routes, but which will benefit from the powers promoted in the Order.
- 2.2.3 The Scheme is a key component of the wider network reinforcement required to facilitate the connection of ODOW to the Transmission System. Located to the south-west of the Spalding Tee-Point the Scheme described below will provide connection points accommodated in 12 substation bays with associated buildings, lighting, security measures, landscaping, access and ancillary infrastructure, all contained within a secure compound.
- 2.2.4 The new Weston Marsh Substation A would be an Air Insulated Switchgear substation. AIS substations use air as the insulation medium for electrical equipment, meaning that equipment is predominantly located outdoors. The total footprint of the new Weston Marsh Substation A is approximately 8.4 hectares, inclusive of a five-metre buffer around the perimeter fence. The substation itself is approximately 420 metres by 185 metres (circa 8.4 hectares).
- 2.2.5 Associated elements within the compound include:
 - (a) Entrance area for buildings, parking and ancillary equipment: approximately 110 metres by 50 metres (around 0.6 hectares) near the site entrance;
 - (b) Overhead line gantries up to 15m above finished site level and high-voltage plant area: approximately 50 metres by 55 metres (around 0.3 hectares); and
 - (c) Control and amenities building.

2.3 Above Ground Works

- 2.3.1 As part of the Scheme, it will be necessary to construct a single storey control and amenities building that will accommodate: essential operational and monitoring systems, including relays and protection control systems; telecommunication equipment; low voltage alternating current supply equipment; and battery rooms.

- 2.3.2 Additional accommodation within the control building will include offices, meeting rooms, a mess room, toilets, changing rooms, and archive storage.
- 2.3.3 The Scheme also requires a range of specialist electrical plant and operational structures. These components facilitate the connection between the substation and the incoming overhead transmission lines.
- 2.3.4 A permanent new access road approximately 390m in length would be constructed as part of the Scheme to provide operational access to the new Weston Marsh Substation A. This would be situated from Marsh Road to the north west of the new Weston Marsh Substation A. During operation, workers would access the new permanent access road via the A151, Stone Gate and Marsh Road.
- 2.3.5 Lighting will be required for safe movement around the compound, inspection and operation of equipment and security purposes.

2.4 Overhead Line Modifications

- 2.4.1 Two separate applications for Section 37 consent ("**Section 37 Applications**") have been submitted, with attendant requests for deemed planning permission pursuant to section 90(2) of the Town and Country Planning Act 1990 (refer to Section 7), for the 4ZM Overhead Line Works and 2WS Overhead Line Works (collectively these are referred to as the "**Proposed Overhead Line Works**").
- 2.4.2 The Proposed Overhead Line Works are required to facilitate the Scheme. The Proposed Overhead Line Works include the diversion and partial removal of both the existing 400kV 4ZM and 2WS overhead lines into the new substation; the 4ZM and 2WS overhead lines currently pass adjacent to the new Weston Marsh Substation A.
- 2.4.3 Reconfiguration of the existing 4ZM overhead line is required to connect into the new Weston Marsh Substation A.
- 2.4.4 The reconfiguration of the existing 2WS requires new overhead lines to turn into the new Weston Marsh Substation A.
- 2.4.5 The Exempt Overhead Line Works are those which fall into exemptions from the requirement to gain consent pursuant to section 37 Electricity Act 1989 pursuant to the Overhead Lines (Exemption) (England and Wales) Regulations 2009 ("**Exemption Regulations**"). They are required to facilitate the Scheme and include the following works:
 - (a) Replacement of insulators and fittings and reconductoring of approximately 2.4 km of the existing 4ZM line between:
 - (a) 4ZM414 N and 4ZM414; and
 - (b) 4ZM407 N and 4ZM405.

(pursuant to Regulation 3(e) Exemption Regulations)
 - (b) Installation of temporary overhead lines on temporary pylons between pylons 4ZM410 to 4ZM409-T to 4ZM408 and 4ZM408 to 4ZM407-T to 4ZM406 for a period not exceeding six months.

(pursuant to Regulation 3(c) Exemption Regulations)

- (c) Placement of two temporary masts (4ZM407-T and 4ZM409-T) to facilitate reconductoring operations along the 4ZM line for a period not exceeding six months.

(pursuant to Regulation 3(c) Exemption Regulations)

2.5 Temporary Construction Works

- 2.5.1 Construction of the Scheme requires the construction of temporary infrastructure to facilitate the construction activities.
- 2.5.2 A total of four temporary construction compounds would be required to facilitate the Scheme. These construction compounds are required for the entirety of the construction period and would be used for the construction of the Scheme. All compounds would be removed and the land reinstated once construction works have been completed.

2.6 Electrification

- 2.6.1 In order to electrify the compounds and Substation, a connection will be created from the distribution network controlled by a Distribution Network Operator, National Grid Electricity Distribution ("**NGED**"). The works will involve the running of an underground line from the existing overhead line to and under Marsh Road and into the construction compound and Substation.

3. JUSTIFICATION

3.1 Preliminary

Introduction

- 3.1.1 National Grid owns and maintains the high-voltage electricity transmission network in England and Wales. The network carries electricity from the generators to substations where the voltage is lowered ready for distribution to homes and businesses. It is National Grid's statutory duty under section 9 of the 1989 Act to develop and maintain an efficient, co-ordinated and economical system of electricity distribution in England and Wales.
- 3.1.2 The following sub-paragraphs in this Section 3 (*Justification*) set out the justification for the Scheme and the legal and policy framework within which the Scheme is proposed to be undertaken. First, the benefits of the Scheme and the assessments carried out in respect of the Scheme that demonstrate these benefits is at paragraph 3.2 (*Benefits*). Then, the text goes on to address the regulatory position of National Grid as an economically regulated utility and National Grid's statutory licence.

3.2 Benefits

Introduction

- 3.2.1 There is an urgent need for renewable energy infrastructure and an improved electricity transmission network to address the causes of climate change. This is acknowledged at both the local and national levels. In particular, NPS EN-1 and other recent Government energy and climate change policy highlight the significant urgency of bringing forward energy infrastructure and that actions to address this urgency need to be accelerated.

- 3.2.2 NESO's Electricity Ten Year Statement 2024 ("**ETYS 2024**") and the Government's Clean Power 2030 Action Plan ("**Clean Power 2030**") both identify that there is a need to rapidly reinforce the network and to deploy additional boundary capability through new projects. ETYS 2024 also identifies a requirement to accelerate network reinforcement in order to reduce network constraint costs as Great Britain transitions towards clean power.
- 3.2.3 Demand for electricity is expected to increase by 50% by 2035 and double by 2050, as the UK decarbonises the sources of energy supplies. Significant new infrastructure is needed to connect this clean energy from where it is generated to where it is needed.
- 3.2.4 To transmit the clean energy from where it is generated, for example from offshore windfarms in the North Sea, to homes and businesses, National Grid needs to build new electricity transmission infrastructure, as well as upgrading existing infrastructure.
- 3.2.5 The UK Government has committed to connect 40GW of electricity generated from offshore windfarms to the electricity grid by 2030, making 50GW in total to meet government targets.
- 3.2.6** The Scheme is a standalone project required to connect the Outer Dowsing Offshore Wind DCO ('**ODOW**'), consented in February 2026, to the Transmission System at Weston Marsh Substation A. The Scheme is therefore critical to enabling up to 1.5 GW of renewable energy to be delivered by 2030, directly supporting the Government's Clean Power 2030 Action Plan: A new era of clean electricity (April 2025) objectives and legally binding net zero commitments. ODOW's 1.5 GW contribution is significant: 3% contribution toward offshore wind targets. National Grid has a statutory duty to facilitate and deliver this connection; ODOW has a connection agreement with NESO, and there is a related contractual agreement between NESO and National Grid. These require a connection point into the Transmission System by 2030. The prospective Grimsby to Walpole DCO also proposes to include the provision of new substation infrastructure at Weston Marsh. However, the works comprising the Scheme are freestanding as they facilitate, and are necessary for, the ODOW connection independently of the progression or outcome of the Grimsby to Walpole DCO and can be delivered and brought into operation entirely separately. **The Scheme is necessary in order to meet the agreement with ODOW to provide connection by 2030.**
- 3.2.7 The Scheme has the potential to provide the following benefits:
- (a) **Net Zero and Clean Energy Benefits:** The Scheme will make a significant contribution to the UK's decarbonisation requirements and climate change targets by enabling the connection of a low carbon generating station. The Scheme supports the reduction of reliance on fossil fuels and helps towards achieving the target of a fully decarbonised electricity system by 2035.
 - (b) **Clean Energy Integration:** The Scheme will assist in ensuring that the supply of energy remains secure, reliable and affordable by providing a connection to the grid for a renewable energy generation project which would provide 1.5 GW of power to the UK energy supply.
 - (c) **Energy Security and Independence:** By providing a connection to the grid for the ODOW project, the Scheme supports the supply of clean, renewable energy from a domestic source, to help reduce the UK's dependence on volatile imported fuels, stabilising energy costs.

- (d) **Meeting Increased Demand:** By providing a connection to the grid for the ODOV project, the Scheme supports the upgrading of the electricity transmission network to handle a predicted doubling of electricity demand by 2050.
 - (e) **Improved Reliability and Modernisation:** The Scheme will provide infrastructure with new, more efficient power lines, that will strengthen the overall network and enable a more automated, efficient, and flexible system.
 - (f) **Lowering Long-Term Costs:** By providing a connection to the grid for the ODOV project, the Scheme supports the increased use of the sustainable domestic wind energy source and is intended to lead to lower utility bills for consumers and businesses.
 - (g) **Habitat creation and enhancement:** The Substation Works will deliver biodiversity benefits through a combination of on-site and off-site habitat creation and enhancement.
 - (h) **Economic Growth and Employment:** The Scheme is expected to create 76 (full time equivalent) jobs per year on average during the construction phase. Whilst a temporary benefit, the increase in economic activity will result in increased spending in the local economy such as in shops, hotels and amenity facilities and will support related industries in the supply chain. National Grid's strategy, particularly with National Grid's business plan for RIIO-T3 (Ofgem's third regulatory framework period running from 1 April 2026 for five years), is to foster long-term collaborations with domestic suppliers to secure the necessary resources for net-zero goals by 2050.
- 3.2.8 The Scheme does result in the loss of a limited amount of Grade 1 (best and most versatile) agricultural land (19.69Ha). While being limited in scale, such loss is unavoidable as a consequence of the Scheme.
- 3.2.9 The Scheme builds on extensive siting work conducted by National Grid for the Grimsby to Walpole Project. Initially this consisted of a Strategic Options Report prepared in 2023 which was subsequently updated in 2025. This document established the needs case for reinforcement to the transmission system in the East Coast region. This was followed by a Corridor Preliminary Routeing and Siting Study for the Grimsby to Walpole DCO ("**CPRSS**") prepared in support of Stage 1 consultation to provide the public and stakeholders with technical information on the project, needs case, options considered, routeing and siting options assessed and a preferred route corridor. A supplementary Weston Marsh targeted consultation took place in November 2025 and was supported by the Weston Marsh Siting Study Report. This detailed the options considered for two substations at Weston Marsh and an appraisal of these options against environmental, social and economic factors, with an emerging preference reported.
- 3.2.10 As set out within the CPRSS and Weston Marsh Siting Study Report, the siting of a new Weston Marsh A substation north-west of and in close proximity to the existing Spalding Tee-Point overhead line junction, represents the greatest opportunity to limit the spread of environmental effects (including impacts upon agricultural land), overhead line deviations of the two existing overhead lines (4ZM and 2WS) and reduce technical complexity during construction and operation and was therefore taken forward as the preferred option.
- 3.2.11 In addition, National Grid acknowledges comments from South Holland District Council's ("**District Council**") Planning Policy Officer in relation to the planning application, which acknowledges that this type of development must go in the countryside as it can't fit into an urban location. He confirmed that there are no large brownfield sites in South Holland District so agricultural land should be used for the Scheme.
- 3.2.12 There were no alternative sites with a lower BMV rating or flood risk available.

3.2.13 The location does have existing electricity transmission infrastructure (OHLs and pylons at Spalding Tee Point). ODOW's DCO consent provides in principle consent for grid connection infrastructure to facilitate a connection to the transmission system within land extending to and surrounding the Spalding Tee-Point at Weston Marsh and including the Order Land.

3.2.14 The Scheme is integral to the operation and decarbonisation of the electricity transmission network. There is an overriding need for the Scheme to be located in this location, not least since it is intended to provide the connection of the ODOW project to the Transmission System.

3.3 Regulatory position

3.3.1 The Order will be submitted by the Acquiring Authority to the Secretary of State for Energy Security and Net Zero for confirmation pursuant to the Acquisition of Land Act 1981. If confirmed by the Secretary of State, the Order will enable National Grid to acquire the Order Land compulsorily.

3.3.2 It is recognised that the Order can only be made where there is a compelling case in the public interest pursuant to paragraphs 2 and 12 of the Government Guidance on Compulsory Purchase Process dated June 2026 ("**the CPO Guidance**") which justifies the overriding of private rights in the Order Land.

3.3.3 There is a clear and compelling case in the public interest for making the Order.

3.4 Consultation

Community Consultations

3.4.1 Consultation and stakeholder input has been integral to the development of the proposals for the Scheme.

3.4.2 Under Section 38 and Schedule 9 of the Electricity Act 1989, National Grid has a duty to have regard to the desirability of the preservation of amenity, particularly including the effect of National Grid's work on communities. National Grid's Stakeholder, Community and Amenity Policy sets out a commitment to meet this duty, making the following consultation commitments:

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

3.4.3 National Grid held a consultation from 18 November 2025 to 19 December 2025 on the Scheme generally. In summary, the consultation and engagement process included:

- (a) Pre-consultation stakeholder briefings, held virtually with local authority planning officers and offered to elected representatives and parish councils in October and November 2025.
- (b) An eight-page invitation newsletter distributed to 971 households and businesses within 1km of the proposals in the week commencing 17 November 2025.
- (c) Three consultation events, comprising two in-person public information events held in Weston (28 November 2025) and Moulton Seas End (29 November 2025), and one online webinar held on 3 December 2025.

- (d) A dedicated project website, supported by social media advertising and print and digital newspaper advertising, which recorded 17,150 homepage views across 7,298 sessions during the consultation period.
 - (e) Multiple feedback channels, including an online feedback form, email, and Freepost address.
- 3.4.4 This engagement also formed part of National Grid's statutory consultation for the Grimsby to Walpole DCO application, setting out detailed proposals for Route Section 5 of the DCO project (within which the Scheme sits). This provided an opportunity for persons of interest, including landowners, to receive information of the project, consider draft designs provide feedback and ask any questions on the project, the process and compensation matters. Feedback was therefore invited as part of the consultation for both the Scheme and the DCO.
- 3.4.5 Respondents raised concerns about the scale of environmental, landscape, construction, agricultural and visual impacts. Some respondents questioned the adequacy of consultation, expressing doubt over their ability to influence the final proposals, and highlighting issues surrounding the duration of consultation, accessibility, clarity, and cumulative impact of the Scheme alongside other projects in the region. All responses were assigned topic-based codes according to the content of the issues raised. Requests and suggestions to change the design of the Scheme were carefully reviewed, and where appropriate this feedback has informed post-consultation design development and refinement.

3.5 Direct engagement related to land assembly process.

- 3.5.1 National Grid has appointed Dalcour Maclaren as Land and Property Consultants to deliver the land negotiation process, this includes working with landowners to secure voluntary agreements for acquisition of Rights as well as freehold acquisitions, where necessary. Following the community consultations carried out, landowners who were potentially affected by the Scheme were contacted individually and invited to face-to-face meetings with the Scheme team during October 2025. This provided an opportunity for landowners to receive detailed explanations of the updated proposals, discuss site-specific considerations, provide feedback and ask any questions on the project, CPO process and compensation matters.
- 3.5.2 Both the face-to-face meetings with landowners and the consultation enabled landowners to submit design change requests based on the proposed design. All feedback has been considered as part of a design refinement process for the Scheme.
- 3.5.3 In April 2026 all affected landowners and their agents were issued with the Scheme's draft Heads of Terms ("**Draft Heads of Terms**"), setting out the proposed approach to the acquisition of land rights and any required freehold interests for the Scheme.
- 3.5.4 Following the issue of these draft Heads of Terms, meetings have taken place with landowners who have requested further discussion and all landowners and their agents have been updated on the Schemes progress and anticipated timescales.
- 3.5.5 Following finalisation of the Scheme design, all landowners and their agents will be provided with detailed Heads of Terms during mid-August 2026, commencing the process of voluntary negotiation for the acquisition of rights and land required to deliver the Scheme. The detailed heads of terms ("**Detailed Heads of terms**") contain the specific rights which National Grid are seeking over the land within the Order, the agreement mechanism proposed to secure these rights, proposed detailed clauses for the required

agreement to secure these rights and a schedule of the commercials being offered. An Option Plan accompanies each of the heads of terms. These provide a visual illustration to landowners, showing the option area and the rights being sought. All rights being sought under voluntary negotiations are no greater than those proposed within the Order and are therefore considered reasonable, proportionate and necessary for the purposes for which they are required. Whilst no agreements have yet been negotiated, no landowners have refused to enter into negotiations, and engagement continues with all landowners. National Grid recognises that landowners whose interests are subject to freehold acquisition under the Scheme are likely to experience a greater degree of impact. These landowners are represented by agents, who continue to engage directly with National Grids agents on their behalf. Following the Draft Heads of Terms issue in April 2026 ongoing face-to-face meetings and correspondence have progressed with these landowners and their agents, evolving negotiations in advance of the Detailed Heads of Terms. This has provided opportunities to avoid, reduce and mitigate impacts with these landowners on a site-specific basis where reasonably practical in a timely manner.

- 3.5.6 In parallel with the above, engagement in the relation to survey access requirements has been maintained. This engagement has included providing clear information regarding surveys, but also the Scheme as a whole. It has provided landowners with the opportunity to discuss or raise concerns on a site-specific level.

3.5.7 Approach to landowner and occupier engagement

- 3.5.8 National Grid has undertaken steps to ensure engagement with landowners is undertaken in a manner which enables and supports them to participate fully in the process.
- 3.5.9 Through the consultation and engagement outlined in this report, National Grid have sought to minimise uncertainty and maintain open and transparent communication with affected landowners throughout the development of the Scheme. Dalcour Maclaren has, as appointed agent, been providing a dedicated point of contact for all landowner matters, from survey requests to Scheme design, updates and process, and voluntary negotiations, ensuring that affected parties have direct access to professional support throughout the process.
- 3.5.10 Throughout the Scheme's programme, Landowners and occupiers are encouraged to appoint a professional representative, normally an RICS qualified land agent, to advise them during the inquiry and in negotiations of the voluntary agreements, the costs of which are met by National Grid in line with the Compensation Code.
- 3.5.11 All correspondence takes place through a variety of platforms so that all landowners can access and receive information through their preferred communication channel. In most instances, landowners have specified their preferred communication method, including through their agents only, by email or by letter.
- 3.5.12 Face-to-face meetings are organised with landowners and their agents at their preferred location, be it their homes, their farm, or their agent's offices. Where appropriate, videocalls are also utilised.
- 3.5.13 All landowners are provided with an opportunity to inform National Grid if they require any additional measures for correspondence or face-to-face meetings. Where specific requests or preferences are made, National Grid consider these and accommodate their needs in line with their requirements and requests.
- 3.5.14 Through consultation events, face-to-face meetings, survey access meetings and heads of terms provided, landowners have been provided with the opportunity to:

- (a) be kept informed of the Schemes design and programme and to raise any questions or concerns;
- (b) receive updates on the infrastructure proposed on their land and the rights National Grid would seek to acquire in relation to the infrastructure;
- (c) receive information around the considerations provided for rights being sought, the compensation available and the recovery of reasonable professional fees; and
- (d) receive information on the compulsory purchase process, compensation principles and relevant guidance.

3.6 Other landowner and occupier engagement

- 3.6.1 Whilst not part of the land assembly or CPO process, ongoing engagement has been undertaken where required to progress the required licences to enable the undertaking of environmental, technical and geotechnical surveys required to inform the final design and assessment of the Weston Marsh Scheme.
- 3.6.2 As part of this engagement landowners and their agents have been contacted in advance of survey activities, with clear information provided on the nature, timing and duration of the works, as well as the measures proposed to minimise disturbance and reinstate land following completion. Survey access is being progressed through voluntary licence agreements, with associated payments, forming an early stage of engagement that allows landowners to raise site-specific concerns and ensures that survey work is undertaken transparently and with appropriate safeguards in place.

4. ENABLING POWER

- 4.1 By Section 9(2) of the 1989 Act, the holder of a licence authorising him to participate in the transmission of electricity is charged with the duty *"to develop and maintain an efficient, co-ordinated and economical system of electricity transmission"*.
- 4.2 National Grid is a holder of an electricity transmission licence granted or treated as granted under Section 6(1)(b) of the 1989 Act which authorises it to participate in the transmission of electricity for the purpose of giving a supply to any premises or enabling a supply to be so given ("**Licensed Activities**"). The Scheme is a "purpose connected with the carrying on" of the Licensed Activities. National Grid owns the high voltage electricity transmission network in England and Wales and operates the Transmission System across Great Britain.
- 4.3 Section 10 and Schedule 3 of the 1989 Act empower National Grid *"to purchase compulsorily any land [including rights in land] required for any purpose connected with the carrying on of the activities which [National Grid] is authorised by [its] licence to carry on."* Therefore, the powers of compulsory acquisition under the 1989 Act can be used by National Grid to assemble the relevant land required for the purpose of the Scheme.

5. LAND AND RIGHTS REQUIRED

5.1 Land Referencing

- 5.1.1 Land Referencing for the Grimsby to Walpole Project began in August 2023 which incorporated areas within the Scheme boundary. Land Referencing for the Scheme started in September 2025. Land Referencing commenced with desktop-based research to compile Land Registry title information alongside existing knowledge of landowners and occupiers

within the area. This work included a detailed review of all Land Registry titles falling within the Order Land to identify any additional rights that could be affected. Updates to ownership have been captured through periodic refreshes.

- 5.1.2 An introductory letter about the Project was circulated as part of the Grimsby to Walpole project in February 2024. In October 2024, this was followed by the distribution of Land Interest Questionnaires (LIQ) to all parties with a relevant land interest, seeking confirmation of their interest and additional detail regarding ownership and occupation. Subsequent LIQs were issued in September 2025 ahead of the Grimsby to Walpole Weston Marsh Section 5 statutory consultation in November 2025. This process supported the verification of information already held and informed preparation of the Maps and Schedule to the Order. Further LIQs have been sent since the first issue in to establish interests following a Land Registry refresh of the data held on the Scheme.
- 5.1.3 Where land was unregistered or where interests required further investigation National Grid has undertaken site-based contact, on-site observations and the posting of notices during November 2025 & March 2026. This also included notices under the Town and Country Planning Act (TCPA) during May 2026 and S.37 application notices during June 2026. On this basis, National Grid considers that the requirement for diligent inquiry has been satisfied.
- 5.1.4 The Order Maps identify the Scheme boundary outlined in red. Land parcels shown in pink denote areas proposed for freehold acquisition. Areas shaded blue indicate land where new rights are sought.
- 5.1.5 In the light of this comprehensive and thorough approach, National Grid has met the test of diligent inquiry in establishing the persons with an interest in the land. This then enables such landowners who have been identified to be notified of the proposed compulsory purchase order.

5.2 Permanent Land Acquisition

- 5.2.1 National Grid is adopting a proportionate land-take strategy and is seeking freehold acquisition of the Order Land only where required for permanent above-ground infrastructure, where the nature and use of the land is being permanently changed, specifically the Weston Marsh Substation A, associated works, access roads and associated landscaping, and environmental mitigation. National Grid's approach is only to acquire the interests that it requires over the various plots within the Order. Therefore, should National Grid only require new rights over this land or any part of it rather than its permanent acquisition, it will seek to create these rather than acquiring a freehold estate. The areas of Order Land proposed for freehold acquisition are shown in coloured pink on the Order Maps and comprise a limited number of plots namely, Plots 01-009, 01-018, 01-028, 01-029, 01-030, 01-032, 01-033, 01-034, 01-035, 01-036, 01-037, 01-038, 01-039, 01-041, 01-042, 02-001, 02-005, 02-006, 02-007, 02-008, 03-024, 03-025, 03-026, 03-028, 03-031, 03-032, 04-001, 04-002, 04-003, 04-004, 04-005.
- 5.2.2 National Grid has completed on the freehold purchase of plots 01-018, 01-028, 01-033, 01-035, 01-037, 01-041, 02-005, 02-006, 02-007, 02-008. These are also shown on the Order Maps as pink. These plots remain in the within the Order so that other rights, estates and other interests can be acquired and/or over-reached.
- 5.2.3 Section 2 of this Statement sets out the works to be undertaken at the substation site as part of the Scheme. Securing the freehold interest is necessary to provide National Grid with exclusive possession and control of the land needed to safely construct, operate and maintain these installations. National Grid currently own land which forms over half of the

proposed substation footprint, associated access, some landscaping works and environmental mitigation proposals.

5.3 Acquisition of New Rights

- 5.3.1 Except for the areas where freehold acquisition is required, National Grid's intention is to secure only the specific interests necessary to deliver the Scheme across the relevant plots. For a number of locations, this means that National Grid proposes to obtain new rights rather than take full ownership of the land.
- 5.3.2 To manage this effectively, the new rights have been organised into defined 'packages', each reflecting the purpose for which the rights are needed and applied to the appropriate plots. Certain rights will apply only for the duration of construction activities, for example those required to establish temporary compounds. Others will be permanent, including rights associated with the installation, operation, maintenance and eventual removal of the realigned overhead line sections.
- 5.3.3 This packaging approach ensures that compulsory acquisition is proportionate and that the level of interference with landowners and occupiers is kept as limited as reasonably achievable. Where a plot is needed only to support a narrow or short-term activity, the corresponding rights package is applied rather than seeking a broader interest.
- 5.3.4 The Order sets out clearly, for each numbered parcel of Order Land, whether land is to be acquired outright or whether new rights are to be taken. Where new rights are proposed, the relevant rights package is identified in the description.
- 5.3.5 The new rights to be purchased compulsorily over the land under this Order are described in Table 1 of the Order Schedule in accordance with the following definitions and the various rights shall be referred to by the Right Reference number indicated in the left hand column of the table below:

"electric lines" means the electric lines and conductors (including wires, earth wires, fibre optic cables and other communication cables, pipes, coatings and ducts and connections) for transmitting and/or distributing electricity at such voltage as National Grid or other licenced operators may from time to time require for the purposes of its or their operations together with the tower(s) (if any) for supporting the same and any ancillary equipment and apparatus associated with or ancillary to such electric lines and conductors

Right Reference Number	Rights	Description of Rights
2	Access Rights	All rights necessary to access the Order Land and adjoining land with or without vehicles, plant, machinery, apparatus, equipment, materials and personnel for the purposes of constructing, installing, commissioning, inspecting, surveying, maintaining, repairing, altering, renewing, replacing and removing or decommissioning the electric lines, substation and associated infrastructure including landscaping and including: a) to carry out de-watering and drainage works and installing, diverting, altering or reinstating land drainage systems; b) to carry out works to facilitate such access including to construct, lay down, use and remove access roads including any necessary bridging, culverting or

		diversion of water courses and drains, modifying road verges and junctions, addition of passing places, and installing, using, altering, diverting, and removing services and utilities; c) to access the Order Land and adjoining land to use horizontal directional drilling, where appropriate, for the installation of the cables; d) to fell, trim or lop trees, shrubs, hedges and bushes and to clear and remove any and all vegetation which may damage, obstruct or interfere with the exercise of these Access Rights; e) to make good any damage caused in connection with the exercise of these Access Rights; and f) to carry out any activities ancillary or incidental thereto, and rights to prevent and remove any works or use of the land which may interfere with or obstruct such access or the exercise of these Access Rights.
3	Not used	Not used
4	Construction Compound Rights	All rights necessary for the purposes of or incidental to the establishment, use and removal of works compounds associated with the construction and commissioning of the substation and associated infrastructure and/or the construction, commissioning and decommissioning of the electric lines, including rights to: a) erect, create, use and remove a works compound which may include portable cabins and offices, noise enclosure, substation and welfare facilities including portable toilets and electricity generators; b) store, stockpile and where necessary use, manage and process plant, machinery, apparatus, materials (including excavated material) and/or equipment; c) remove topsoil, adjust the height of the land, lay geotextile membrane and/or stone surface (or similar surface) on the compound and to store the soil; d) access the land and adjoining land with or without vehicles, personnel, plant, machinery, apparatus, equipment and materials for such purposes; e) carry out works to facilitate such areas including to construct, lay down, use and remove access roads including any bell mouths, temporary roads, necessary bridging, culverting or diversion of watercourses and drains, erecting fencing or gates, carrying out security operations, carrying out earth works, removing buildings or structures or apparatus, modifying road verges and junctions; f) erect, create, use and remove temporary towers and any associated apparatus (including earth wires) for the purpose of diverting electric lines to enable the dismantling of the existing pylons; g) fence, erect hoardings, scaffolding or signage or otherwise secure the compound;

		h) carry out de-watering and drainage works and install, alter, reinstate or remove land, drainage systems; i) discharge water into existing drains and watercourses; j) monitor, including assets and equipment; k) carry out environmental surveys and works for the purpose of protecting wildlife and habitats during construction; l) support and protect the compound; m) install, use and remove artificial lighting; n) park cars; o) protect and prevent damage to or interference with the operation and maintenance of any works constructed pursuant to these Construction Compound Rights; p) fell, trim or lop trees, shrubs, hedges, bushes and vegetation and to remove any and all vegetation, walls, fences or other structures which may damage, obstruct or interfere with the exercise of these Construction Compound Rights with or without vehicles plant and equipment; q) install, use, alter, divert and remove services and utilities; r) reinstate the land and make good any damage caused in connection with the exercise of these Construction Compound Rights; and s) carry out any activities ancillary or incidental thereto, and rights to prevent and remove any works or use of the land which may interfere with or obstruct such access or the exercise of these Construction Compound Rights.
5	Not used	Not used
6	Drainage Rights	All rights necessary for the purposes of or incidental to the carrying out of de-watering and drainage works and to install, alter, use, maintain, reinstate or remove drainage systems, including to: a) access the land and adjoining land with or without vehicles, personnel and plant, machinery, apparatus, equipment and materials for such purposes; b) protect and prevent damage to or interference with the operation and maintenance of any de-watering and/or drainage works; c) make good any damage caused in connection with the exercise of these Drainage Rights; and d) carry out any activities ancillary or incidental thereto. and rights to prevent and remove any works or use of the land which may interfere with or obstruct such access or the exercise of these Drainage Rights.

7	Overhead Line Maintenance Access Rights	All rights necessary to access the land and adjoining land for the purposes of the retention, operation, protection, maintenance, surveying, repair, renewal, replacement, removal and decommissioning of the electric lines, with or without vehicles, plant, machinery, apparatus, equipment, materials and personnel, including to: a) carry out de-watering and drainage works and installing, altering or reinstating land drainage systems; b) carry out works to facilitate such access including to construct, lay down, use and remove access roads including any necessary bridging, culverting or diversion of water courses and drains, modifying road verges and junctions and installing, using, altering, diverting, and removing services and utilities; c) fell, trim or lop trees, shrubs, hedges and bushes and to clear and remove any and all vegetation which may damage, obstruct or interfere with these Overhead Line Maintenance Access Rights; d) make good any damage caused in connection with the exercise of these Overhead Line Maintenance Access Rights; and e) carry out any activities ancillary or incidental thereto, and rights to prevent and remove any works or use of the land which may interfere with or obstruct such access or the exercise of these Overhead Line Maintenance Access Rights.
8	Not used	Not used
9	Overhead Line Rights	All rights necessary for the purposes of or incidental to the construction, installation, retention, commissioning, operation, protection, maintenance, surveying, repair, renewal, replacement, removal and decommissioning of the electric lines, including to: a) take all necessary rights of support for the electric lines; b) install and remove protection measures for third party structures/assets, including scaffolding; c) test and commission the electric lines and to remedy initial faults and defects in them at any time prior to the date on which it is energised and ready for operation; d) enter the land and carry out surveys and investigations, including aerial surveys (including the right to fly an unmanned aircraft over the land and to enter and retrieve and recover any such unmanned aircraft from the land); e) carry out archaeological works, environmental and/or ecological mitigation and/or works (including mitigation planting) and associated monitoring and maintenance with or without vehicles plant and equipment;

		f) carry out works required or permitted by a planning permission and/or consent or licences; g) erect and remove fencing, scaffolding, hoardings or signage and otherwise secure the requisite compound; h) store and stockpile and where necessary use, manage and process plant, machinery, apparatus, and materials (including excavated material) and/or equipment; i) access the land and adjoining land with or without vehicles, personnel, plant, machinery, apparatus, equipment and materials for such purposes; j) facilitate a footpath diversion; k) construct, lay down, use and remove access roads including any bellmouths, temporary roads, necessary bridging, culverting or diversion of water courses and drains, carrying out security operations, carry out earth works, modifying road verges and junctions and installing, using, altering, diverting, and removing services and utilities; l) carry out de-watering and drainage works and install, alter, reinstate or remove land drainage systems; m) discharge water into existing drains and watercourses; n) protect and prevent damage to or interference with the operation and maintenance of the electric lines and construction of the same; o) fell, trim or lop trees, shrubs, hedges and bushes and to clear and remove any and all vegetation or alter any and all walls, fences or any other structures or erections on the land which may damage, obstruct or interfere with these Overhead Line Rights with or without vehicles, plant and equipment; p) erect, create, use and remove welfare facilities including portable toilets, portable cabins and offices and electricity generators; q) install, use and remove artificial lighting; r) install, use, alter, divert and remove services and utilities; s) prevent changes to the use, or level of the surface of, the land; t) carry out incidental works to allow safe access to the electric lines such as vegetation clearance and bird nest removal; u) apply a temporary electricity earthing system to electric lines; v) make good any damage caused in connection with the exercise of these Overhead Line Rights; and w) carry out any activities ancillary or incidental thereto,
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		and rights to prevent and remove any works or use of the land which may interfere with or obstruct such access or the exercise of these Overhead Line Rights.
10	Not used	Not used
11	Not used	Not used
12	Not used	Not used
13	Construction Access Rights	All rights necessary to access the land and adjoining land for the purposes of the construction, commissioning and decommissioning of the electric lines, and/or the construction, commissioning and decommissioning of the substation and associated infrastructure and/or the establishment, use and removal of works compounds, with or without vehicles, plant, machinery, apparatus, equipment, materials and personnel, including to: a) carry out de-watering and drainage works and installing, altering or reinstating land drainage systems; b) carry out works to facilitate such access including to construct, lay down, use and remove access roads including any necessary temporary bridging, culverting or diversion of water courses and drains, modifying road verges and junctions and installing, using, altering, diverting, and removing services and utilities; c) fell, trim or lop trees, shrubs, hedges and bushes and to clear and remove any and all vegetation which may damage, obstruct or interfere with the exercise of these Temporary Access Rights; d) make good any damage caused in connection with the exercise of these Temporary Access Rights; and e) carry out any activities ancillary or incidental thereto, and rights to prevent and remove any works or use of the land which may interfere with or obstruct such access or the exercise of these Temporary Access Rights.
14	Construction Drainage Rights	All rights necessary for the purposes of or incidental to the carrying out of de-watering and drainage works and to install, alter, use, maintain, reinstate or remove drainage systems required for the purposes of the construction, commissioning and decommissioning of the electric lines and/or the construction, commissioning and decommissioning of the substation and associated infrastructure and/or the establishment, use and removal of works compounds including to: a) access the land and adjoining land with or without vehicles, personnel and plant, machinery, apparatus, equipment and materials for such purposes;

		b) protect and prevent damage to or interference with the operation and maintenance of any de-watering and/or drainage works; c) make good any damage caused in connection with the exercise of these Drainage Rights; and d) carry out any activities ancillary or incidental thereto. and rights to prevent and remove any works or use of the land which may interfere with or obstruct such access or the exercise of these Construction Drainage Rights.
15	Visibility Splay Rights	All rights necessary at all times for the purposes of or incidental to ensuring safe vehicular access and egress from the public highway as necessary for the purpose of access to land for constructing and commissioning of the electric lines, and/or the constructing and commissioning of the substation and associated infrastructure and/or the establishment, use and removal of works compounds including to: a) remove, fell, trim or lop trees, bushes, crops and other vegetation, including the removal of hedgerows; b) prevent the erection of any buildings or structures, the placing or storage of any equipment or materials, the parking of any vehicles, the planting or growing of any trees, shrubs or other vegetation on, or the increase in the ground level of, the land, which would reasonably foreseeably restrict visibility of vehicles attempting to join the highway; c) make good any damage caused in connection with the exercise of these Visibility Splay Rights; and d) carry out any activities ancillary or incidental thereto, and rights to prevent and remove any works or use of the land which may interfere with or obstruct such access or the exercise of these Visibility Splay Rights.
16	Working Area Rights	All rights necessary for the purposes of or incidental to the construction and commissioning, replacement and/or upgrading of the electric lines and associated equipment, and/or the construction, commissioning and decommissioning of the substation and associated infrastructure including rights to: a) enter and be on the land with or without vehicles, plant, machinery, apparatus, equipment, materials and personnel; b) remove, construct, install, replace, and modify overhead electricity lines and associated equipment; c) test and commission the overhead electricity lines, conductors, electricity pylons and infrastructure within, on or over the land and to remedy initial faults and defects in them at any time prior to the date on which the line is energised and ready for commercial operation;

		d) to carry out works to construct and install the substation and all associated infrastructure including the construction of gantries for the termination of overhead electric line connections into the substation and any other necessary works; e) and carry out surveys and investigations, including intrusive and aerial surveys (including the right to fly an unmanned aircraft over the land and to enter and retrieve and recover any such unmanned aircraft from the land); f) carry out archaeological environmental and/or ecological mitigation works and create, use, maintain, inspect, and remove ecological mitigation measures; g) carry out works required by the contractor by licences or consents. h) remove, replace, fell, trim or lop trees, bushes, crops and other vegetation, including removal of hedgerows; i) store and stockpile and where necessary use manage and process plant, machinery, apparatus, and materials (including excavated material) and/or equipment; j) carry out works to facilitate access including to construct, lay down, use and remove access roads including any necessary bridging and associated works, culverting or diversion of water courses and drains, modifying road verges and junctions and installing, using, altering, diverting, and removing services and utilities; k) fence, erect hoardings, or signage or otherwise secure the working area; l) install, use and remove artificial lighting; m) install, use, alter, divert, and remove services and utilities; n) carry out drainage works and install, alter, or reinstate land drainage systems; o) erect, use, maintain, repair, reinstate and remove temporary scaffolds, and rights to prevent and remove any works or use of the land which may interfere with or obstruct such access or the exercise of these Working Area Rights.
17	Ecological Rights	All rights necessary at all times for the purposes of or incidental to installing, creating, using, retaining, maintaining, replacing, inspecting and removing ecological mitigation measures including rights to: a) trim or lop trees, bushes, crops and other vegetation such as hedgerows, and to retain, inspect & maintain the vegetation growth; b) plant, maintain, cultivate and crop relevant vegetation; c) install and remove any equipment to allow ecological works to take place such as boxes and ecology fences/gates;

		d) to access the land, at all times, with or without vehicles, plant, machinery, apparatus, equipment, materials and personnel for the purposes of the aforementioned rights and rights to prevent any works on or use of the land that would prevent the exercise of the aforementioned rights.
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5.3.6 The land over which the new rights are to be purchased compulsorily is shown coloured blue on the Order Maps, namely plots 01-001, 01-002, 01-003, 01-004, 01-005, 01-006, 01-007, 01-008, 01-010, 01-011, 01-012, 01-013, 01-014, 01-015, 01-016, 01-017, 01-019, 01-020, 01-021, 01-022, 01-023, 01-024, 01-025, 01-026, 01-027, 01-031, 01-040, 02-002, 02-003, 02-004, 02-009, 02-010, 02-011, 02-012, 02-013, 02-014, 02-015, 02-016, 02-017, 02-018, 02-019, 02-020, 02-021, 02-022, 02-023, 02-024, 02-025, 02-026, 02-027, 02-028, 02-029, 02-030, 03-001, 03-002, 03-003, 03-004, 03-005, 03-006, 03-007, 03-008, 03-009, 03-010, 03-011, 03-012, 03-013, 03-014, 03-015, 03-016, 03-017, 03-018, 03-019, 03-020, 03-021, 03-022, 03-023, 03-027, 03-028, 03-029 and 03-030.

5.3.7

5.3.8 The above new rights are for the benefit of the undertaking of National Grid for the transmission of electricity including without limitation such land and hereditaments forming part of that undertaking as are accommodated by the rights set out in the Order.

5.4 Mining Code

5.4.1 Ownership of the mines and mineral rights are excluded from the Order.

5.4.2 However, Parts II and III of Schedule 2 to the 1981 Act, which concern the 'Mining Code', are expressly incorporated within the Order, first in order to safeguard and protect all apparatus and other equipment which will be constructed and/or installed by National Grid and its contractors for the purposes of the Scheme and second to preserve the rights of the owner of the sterilised mines or minerals to claim compensation.

6. ACQUISITION STRATEGY AND PROGRESS TO DATE

6.1 National Grid's Acquisition Strategy

6.1.1 National Grid's preference will always be to secure land rights on a voluntary basis. This is through a commitment to securing the land and rights required for the Scheme by voluntary agreement wherever that can reasonably be achieved and continues to progress discussions with landowners and occupiers. Despite the engagement undertaken to date, not all of the interests within the Order Land have yet been acquired.

6.1.2 To ensure that the land and rights needed for the Scheme can be assembled within a suitable and predictable timeframe, it has become necessary for National Grid to advance the compulsory purchase process alongside ongoing private treaty negotiations. The approach of running the CPO process in parallel with continued engagement is expressly anticipated by paragraph 17 of the CPO Guidance. National Grid will therefore continue to pursue negotiated agreements throughout the CPO process wherever possible. To help to facilitate this, National Grid's Guidance on Land Rights for New Electricity Transmission Assets (England and Wales) ("GLR") has been used.

6.1.3 The GLR was developed by National Grid in 2010 in order to provide a consistent methodology for acquiring land rights for National Grid's infrastructure projects, both for Development Consent Orders and Town & Country Planning Act/Compulsory Purchase

Order schemes. The GLR has been implemented on all National Grid projects requiring land and rights acquisition and remains under continuous review to ensure that it is still fit for commercial purpose and meets the expectations of third-party landowners and occupiers. National Grid was one of the first utility companies to formally adopt and promote this approach and it accords with the CPO Guidance.

- 6.1.4 Whilst National Grid seeks to avoid the use of compulsory purchase powers by negotiating by private treaty, in order to ensure the timely delivery of the Scheme, it is necessary to seek compulsory purchase powers. Negotiations to obtain, by agreement, the remainder of the necessary land and rights will continue in parallel with the compulsory purchase process. Compensation will be paid pursuant to the Compensation Code.

6.2 Progress

- 6.2.1 As indicated above, National Grid has been seeking to secure all necessary land and rights required to deliver the Scheme. To date, National Grid has completed on the freehold purchase of Crowtree Farm, including plots 01-018, 01-028, 01-033, 01-035, 01-037, 01-041, 02-005, 02-006, 02-006, 02-007, 02-008. These are also shown on the Order Maps as pink and remain in the within the Order to seek the authority that other rights, estates and other interests can be extinguished.
- 6.2.2 For the remaining plots, where there are known landowners, National Grid are seeking voluntary acquisition, as stated in section 3.5. To date, engagement has been constructive, with negotiations continuing across the land interests required for the Scheme.
- 6.2.3 National Grid will continue these voluntary negotiations in parallel with the promotion of the Order, as the Order is its last resort to ensure that it has acquired all the rights that it requires to deliver the Scheme in accordance with the project programme. Notwithstanding National Grid's ongoing commitment to voluntary negotiations with known landowners, National Grid must have certainty in respect of the rights and land that it requires in order to ensure the comprehensive delivery of the Scheme.
- 6.2.4 The table below provides an overview of the progress made in negotiations with identified landowners regarding both freehold acquisitions and the rights proposed to be taken. Discussions have been undertaken on a Subject to Contract and Without Prejudice basis. The table summarises the current position on Heads of Terms and legal agreements, including details of meetings held and the dates on which communications were issued.

Plot	Owner	Summary of Proposed Rights Being Sought	Status of Negotiations
01-018; 01-041; 01-035; 01-033; 01-037; 01-028; 02-005; 02-006; 02-007; 02-008;	National Grid	National Grid has completed on the freehold purchase of these plots to support the delivery of the project.	N/A
01-017; 01-019; 01-020; 01-021; 01-022; 01-023; 01-025; 01-027; 01-030; 01-031; 01-034; 01-042; 01-043; 02-003; 02-004; 02-030;	George Hay & Sons Limited	Option agreement for Freehold Acquisition to accommodate the substation, environmental mitigation requirements and the temporary diversion of the footpath. and associated overhead line rights	Draft Heads of Terms issued 14/04/2026. A meeting was held on 15/05/2026 to discuss the Heads of Terms, mitigation measures and potential land swap arrangements. A further face-to-face meeting was

03-006; 03-007; 03-008			held with the landowner and their agent on 06/08/2026 to continue negotiation discussions. The landowner remains engaged and is receptive to voluntary discussions regarding a land swap to mitigate impacts on the farming business and facilitate the proposed substation site and/or acquisition. Detailed Heads of Terms to be issued mid-August 2026.
01-004	John Grant (Donington)	Option agreement for the acquisition of overhead line rights.	Draft Heads of Terms issued 01/04/2026, with an update provided on 08/05/2026. A meeting was held on 14/07/2026 to provide an update on the Heads of Terms and proposed rights. The landowners remain engaged and open to voluntary discussions. Negotiations are ongoing. Detailed Heads of Terms to be issued mid-August 2026.
03-014;03-019;03-027, 03-013 as reputed owner, 03-015 as reputed owner, 03-029 as reputed owner. 03-030 as reputed owner.	Oldershaws of Moulton Limited	Option agreement for the acquisition of Overhead Line Rights, Construction Access Rights, Visibility Splay Rights	Draft Heads of Terms issued 01/04/2026. The agent has requested detailed proposals based on the final design before progressing substantive negotiations. Follow-up correspondence has been issued and negotiations remain active. The existing rights position is under review whilst voluntary acquisition discussions continue. Detailed Heads of Terms to be issued mid-August 2026.
03-012;03-017, 03-016 as reputed Owner for drain.	Oldershaws of Moulton Limited and Moulton Bulb Company Limited	Option agreement for the acquisition of Construction Access Rights	Draft Heads of Terms issued 01/04/2026. The agent has requested detailed proposals based on the final design before progressing substantive negotiations. Follow-up correspondence issued and negotiations remain active. Existing rights position under review whilst voluntary acquisition discussions continue.

			Detailed Heads of Terms to be issued mid-August 2026.
01-002	Ann Naylor, Brian Douglas Naylor, Simon Brian Naylor	Option agreement for the acquisition of Overhead Line Rights and Overhead Line Maintenance Access Rights and Construction Access Rights.	Draft Heads of Terms issued 01/04/2026. Agent chased on 06/05/2026 to arrange meeting. The agent has requested detailed proposals based on the final design . Detailed Heads of Terms to be issued mid-August 2026.
01-01-040	Patrick William Mews & David Hicken	Option agreement for the acquisition of Overhead Line Rights	01.04.2026- Head of terms issued to agent. 08/05/2026 Comms to agent re: TCPA notices and submission with update on Draft Heads of Terms. 14/07/2026 - meeting with landowner and agent to provide update and discuss indicative rights. Landowner happy to engage and next meeting scheduled once Detailed Heads of Terms have been issued. Detailed Heads of Terms to be issued mid-August 2026.
02-014;02-015;02-016;02-017;02-018;02-020;02-021;02-022;02-023;02-024;02-025;02-026;02-027, 01-015 reputed owner,	The King's Most Excellent Majesty In Right Of His Crown	Option agreement for the acquisition of Overhead Line Rights, Construction Access Rights.	Draft Heads of Terms issued 01/04/2026. Initial HOTS meeting held 09/04/2026. Consultation plans were shared showing the Crown's affected land and the works proposed across the Crowns Land. Discussions are being managed through Crown Estate representatives and specialist National Grid contacts. Negotiations ongoing regarding rights required and if these are in addition to what currently exists. 31/08/2025 – Agent contacted to clarify ownership along the River Welland – an unregistered parcel. Detailed Heads of Terms to be issued mid-August 2026.
03-001	Holt William Myers	Option agreement for the acquisition of Construction Access Rights.	This parcel of land was added as part of the design.

			Detailed Heads of Terms to be issued mid-August 2026.
03-010, 03-009 as reputed owner for drain.	G.H. Myers Limited	Option agreement for the acquisition of Construction Access Rights	Draft Heads of Terms issued 01/04/2026. 01.04.2026- issued to agent. 08/05/2026 Communication to agent re: TCPA notices and submission with update on HOTs. 21/07/2026 - awaiting Agent to confirm meeting with Landowner. Detailed Heads of Terms to be issued mid-August 2026.
02-028, 02,011, 02-012, 02-029	Denis John Grimwood & Robert Henry Oldershaw & Bridgett Lucy Posey & Jane Roberta Ashby Cooke & Patricia Grimwood & Susan Oldershaw & Robert Henry Oldershaw Jnr & Christopher Jamie Woodrow & Sarah Lucy Woodrow (as trustee for the Moulton Bulb Company Limited Retirement Benefit Scheme)	Option agreement for the acquisition of Overhead Line Rights.	Draft Heads of Terms issued 01/04/2026. Agent only wants meeting once detailed HOTs are provided. . Detailed Heads of Terms to be issued mid-August 2026.
03-020;03-023 reputed owner; 03-026;03-032;04-001, 03-021 as reputed owner for drain, 03-022 as reputed owner for drain.	Albert Edwin Mark Slator & Howard Marshall Jones	Option agreement for the acquisition of Construction Access Rights, freehold acquisition.	Draft Heads of Terms issued 01/04/2026. Agent only wants meeting once Detailed Heads of Terms issued on the final design Detailed Heads of Terms to be issued mid-August 2026.
01-006	Simon Charles Harrison, Glynn Waltham, The Executor of the Estate of the Late James Allen Dobney, The Executor of the Estate of the Late Ambrose Garner	Option agreement for the acquisition of Overhead Line Rights, Overhead Line Maintenance Access Rights	Draft Heads of Terms were issued on 01/04/2026 and an update provided on 08/05/2026. Meeting held on 14/07/2026 to provide an update on the Heads of Terms and proposed rights. Landowner remains engaged and is open to voluntary discussions. Negotiations are ongoing. Detailed Heads of Terms to be issued mid-August 2026.

01-007	Simon Charles Harrison & Brian Templeman & Alexander Buchanan Watson & The Executor of the Estate of the Late James Allen Dobney & The Executor of the Estate of the Late Ambrose Garner & The Executor of the Estate of the Late Jack Wayman	Option agreement for the acquisition of Overhead Line Rights	Draft Heads of Terms were issued on 01/04/2026 and an update provided on 08/05/2026. Meeting held on 14/07/2026 to provide an update on the Heads of Terms and proposed rights. Landowners remain engaged and is open to voluntary discussions. Negotiations are ongoing. Detailed Heads of Terms to be issued mid-August 2026.
01-008;01-009;01-010	Surfleet United Charities	Option agreement for the acquisition of Overhead Line Rights, Construction Access Rights and freehold acquisition for the temporary PRoW diversion.	Draft Heads of Terms were issued on 01/04/2026 and an update provided on 08/05/2026. Meeting held on 14/07/2026 to provide an update on the Heads of Terms and proposed rights. Landowner remains engaged and is open to voluntary discussions. Negotiations are ongoing. Detailed Heads of Terms to be issued mid-August 2026.
01-016	Environment Agency	Option agreement for the acquisition of Overhead Line Rights	Draft Heads of Terms were issued on 01/04/2026 to the Agent. 08/05/2026 Communications to agent re: TCPA notices and submission with update on HOTs. Agent waiting for detailed draft Heads of Terms. Detailed Heads of Terms to be issued mid-August 2026.
02-009;02-010;02-011;03-003;03-011	South Holland Internal Drainage Board	Option agreement for the acquisition of Working Area Rights; Overhead Line Rights / Construction Drainage Rights; Overhead Line Rights / Overhead Line Maintenance Access Rights / Construction Access Rights.	Draft Heads of Terms issued 01/04/2026. A meeting was held on 20/05/2026 between SHIDB, National Grid and WSP (the projects engineering design team) to discuss drainage diversions, outfalls and the rights required. Engagement has been positive, with technical matters to be progressed through the design team. Negotiations are ongoing. Detailed Heads of Terms to be issued mid-August 2026.

01-011	The Welland And Deepings Internal Drainage Board.	Option agreement for the acquisition of Overhead Line Aces Rights and Construction Access Rights.	Draft Heads of Terms issued 01/04/2026. Waiting for detailed draft Heads of Terms. Detailed Heads of Terms to be issued mid-August 2026.
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7. SPECIAL CATEGORY LAND & STATUTORY UNDERTAKERS

7.1 Statutory Undertakers

7.1.1 Freehold ownership and other interests are held by the following statutory undertakers in land affected by Scheme:

(a) Environment Agency

Hold interests across Plots 01-015;01-016

(b) Anglian Water Services Limited

Hold interests across Plots 01-001;01-005;01-017;01-018;01-022;01-025;01-028;01-029;01-033;01-035;02-019;03-002;03-003;03-004;03-005;03-006;03-020;03-023;03-024;03-028;03-031;04-003;04-004

(c) British Telecommunications PLC

Hold interests across Plots 01-001;01-002;01-005;01-008;01-010;01-027;01-029;01-030;01-032;01-033;01-037;01-041;03-002;03-003;03-004;03-005;03-006;03-024

(d) Openreach Limited

Hold interests across Plots 01-001;01-002;01-005;01-008;01-010;01-011;01-029;01-030;01-032;01-033;01-037;01-041;02-017;02-018;03-002;03-004;03-005;03-006;03-024;03-025;03-031;04-004;04-005

(e) Cadent Gas Limited

Hold interests across Plots 02-014;02-015;02-016;02-017;02-018;02-020;02-021;02-022;02-023;02-024;02-025;02-026;02-027

(f) National Grid Electricity Distribution (East Midlands) PLC

Hold interests across Plots 01-002;01-004;01-005;01-008;01-009;01-010;01-017;01-018;01-021;01-023;01-025;01-026;01-027;01-029;01-030;01-031;01-034;01-035;01-038;01-039;01-040;01-041;02-011;02-030;03-006;03-007;03-008;03-024;03-025;03-026;04-002;04-003;04-004;04-005

(g) National Grid Electricity Transmission PLC

Hold interests across Plots 01-002;01-003;01-004;01-005;01-006;01-008;01-015;01-016;01-017;01-018;01-024;01-026;01-027;01-028;01-029;01-030;01-031;01-032;01-033;01-034;01-035;01-037;01-039;01-040;01-041;01-042;01-

043;02-001;02-002;02-003;02-004;02-005;02-006;02-007;02-008;02-010;02-011;02-012;02-013;02-014;02-015;02-020;02-021;02-024;02-026;02-027;02-028;02-029;02-030;03-006;03-007;03-008;03-010;03-012;03-014;03-017;03-019;03-020;03-026;03-027;04-001

(h) South Holland Internal Drainage Board

Hold interests across Plots 01-027;01-030;01-031;01-032;01-033;01-034;01-041;01-042;01-043;02-001;02-002;02-003;02-004;02-005;02-006;02-007;02-008;02-009;02-010;02-011;02-012;02-020;02-021;02-030;03-003;03-004;03-007;03-010;03-011;03-012;04-004

(i) The Welland And Deepings Internal Drainage Board

Hold interests across Plots 01-002;01-003;01-004;01-011;01-014

(j) The Secretary of State for Environment, Food and Rural Affairs

Hold interests across Plots 02-009;02-010;02-011;03-003;03-011

7.1.2 Land Owned by Other Licence-Holders

Interests are held by the following Other Licence-Holders in the land affected by the Scheme:

(a) InterGen (UK) Ltd

Hold interests across Plots 01-043;02-006;02-008;03-006

7.1.3 Land Owned by a Local Authority

The Order Land contains land owned by the following local authorities:

a) Lincolnshire County Council ("**County Council**")

Hold interests across Plots 01-001;01-005;01-008;01-009;01-010;01-011;01-014;01-016;01-024;01-026;01-029;01-031;01-033;01-034;01-041;01-042;01-043;02-001;02-014;02-017;02-018;02-019;03-001;03-002;03-003;03-004;03-005;03-006;03-007;03-008;03-020;03-024;03-026;03-028;04-001;04-003;04-004

7.1.4 Land Owned by the National Trust

The Order Land does not include any land owned by the National Trust.

7.1.5 Common Land, Open Space and Allotments

The Order Land does not include any areas of common land, open space or fuel or field garden allotments.

7.1.6 Burial Grounds, Ecclesiastical Property, Listed Buildings and Conservation Areas

The Order Land does not encompass any burial grounds, ecclesiastical property, listed buildings or land situated within a conservation area.

7.1.7 Crown Land

The Order Land includes plots in which Crown interest are present (listed below) These plots have been included in The Order as they are required for the Scheme. In accordance with section 63 of the Electricity Act 1989, the inclusion of Crown land within the Order does not authorise the compulsory acquisition of any Crown interest. Any exercise of power to carry out works in relation to the Crown land will be subject to the prior consent of the appropriate authority. National Grid has opened negotiations with the Crown Agent as necessary to secure any required consents. Hold interests across 02-014;02-015;02-016;02-017;02-018; 02-019;02-020;02-021;02-022;02-023;02-024;02-025;02-026;02-027, the freehold of which is held by His Majesty in Right of the Crown, and Plots 01-015 as reputed owner, where a Crown interest is believed to be in existence as this is a tidal river.

7.1.8 National Grid's discussions and negotiations with each of these parties is ongoing.

8. OTHER CONSENTS

8.1 Planning Permission

8.1.1 The Substation Works are to be consented pursuant to the Town and Country Planning Act 1990. A full planning application for the Substation Works was submitted to South Holland District Council on 11 May 2026 (reference H22/0466/26) ("**Planning Application**"). The description of development for which planning permission is sought pursuant to the Planning Application is as follows:

"Construction of the new Air Insulated Substation (AIS) – 400kV Weston Marsh Substation A, associated landscaping and environmental mitigation works, drainage, highways and other associated works"

8.1.2 The Planning Application is expected to be taken to the District Council's planning committee on 21 October 2026 with determination expected on 4th November 2026.

8.1.3 There remain outstanding objections as follows:

Objector and Topic	Nature of objection	Comment
County Council, Archaeology	Geophysical and trial trenching should be undertaken prior to determination	This level of surveys would usually be undertaken following grant of consent and secured by condition. However, notwithstanding this, National Grid has commissioned a geophysical survey which will be completed in September, ahead of the Planning Application being considered by the District Council's planning committee

Environment Agency	Objection 1) design of illustrative watercourse outfall basin, due to a possible effect on European eels, 2) insufficient detail over non mains foul drainage system and risks of pollution to water environment	It is considered that these issues will be dealt with in detailed design and a condition can be used to ensure the relevant details of the design are secured
InterGen	Objection on the Substation Works crossing InterGen's gas pipe with no crossing agreement in place	It is anticipated a crossing agreement with InterGen will be completed prior to the date of the District Council's planning committee and the objection will be resolved
Inward Investment	Request for a financial contribution to be paid by National Grid	Discussions are being held as to the nature of the contribution being requested and compliance with tests set out in regulation 122 of the Community Infrastructure Levy Regulations 2010

8.1.4 It can be seen from the table above that it is considered that the objections are all capable of being resolved. However, notwithstanding this, it is considered that the Substation Works accord with national and local planning policy. Therefore, securing the grant of planning permission for the Substation Works is unlikely to present an impediment to the delivery of the Scheme and National Grid is not aware of any reasons why planning permission would be withheld.

8.2 Permitted Development Rights

8.2.1 Parts of the Scheme are permitted development pursuant to the Town and Country Planning (General Permitted Development) (England) (Order) 2015 ("**GPDO**").

8.2.2 National Grid will make use of permitted development rights pursuant to GPDO Schedule 2, Part 15, Class B(a) for:

- (a) the replacement of overhead lines;
- (b) the installation of temporary overhead lines;
- (c) works to electrify the Substation and construction compound by the earthing of existing lines and laying of an underground cable; and

- (d) the installation of overhead lines to the Substation on land owned by National Grid.

8.2.3 All restrictions and conditions to fall within the class of permitted development are met.

8.3 Consents Pursuant to the 1989 Act

Section 37 Consent

8.3.1 The Proposed Overhead Line Works are to be consented pursuant to section 37 of the 1989 Act and a request for a deemed planning permission under section 90(2) of the Town and Country Planning Act 1990.

8.3.2 The description of development for which section 37 consent is sought for the 4ZM Overhead Line Works is as follows:

Installation of 0.9km of overhead line and removal of 0.7km of existing overhead line along the 4ZM line.

8.3.3 The description of development for which section 37 consent is sought for the 2WS Overhead Line Works is as follows:

Construction of new sections of 2WS overhead line not exceeding 0.9km in length, the installation of three new pylons, and the removal of approximately 830m of the existing 2WS Overhead Line and dismantling of two existing pylons.

8.3.4 The Section 37 Applications also apply for a direction pursuant to section 90(2) of the Town and Country Planning Act 1990 for deemed planning permission for these works and ancillary development being haul roads, SuDs drainage laydown areas, crossing protection and maintenance access associated with the Proposed Overhead Line Works.

8.3.5 The Section 37 Applications were made to the Secretary of State on 22 June 2026. Following a request by the Secretary of State for the District Council and County Council to be reconsulted on the detail within the applications, this consultation is currently taking place and is anticipated to end by mid-September. The Secretary of State will then determine the applications either with or without a public inquiry.

8.3.6 As part of the process of applying for consent pursuant to section 37 of the 1989 Act, a "Form B" is sent to local authorities, requiring them to confirm whether they will raise objections on the proposal.

8.3.7 The District Council have not stated they raise an objection, instead noting "very strong and major concerns". They did not request a public inquiry be held, but they asked the Secretary of State to carefully consider the impacts of the development. The issues raised and National Grid's position is recorded below:

Issue	National Grid's response
Loss of best and most versatile agricultural land (" BMV agricultural land ")	The District Council's EIA screening opinion for the Planning Application considered this issue for the whole Scheme and concluded that effects of the loss of BMV agricultural land are "unlikely to be significant in terms of the criteria outlined" in schedule 3 of the EIA Regulations. Further, they did not identify loss of BMV as a key issue for the

	Planning Application, but as a matter to be weighed in the overall planning balance. Whilst this advice was given in the context of the Substation Works, the Section 37 Applications relate to pylon footings and limited length of a temporary haul road so relates to a fraction of the area.
Construction impacts upon the local community including the impact of construction traffic and suitability of Stonegate for construction traffic	Approximately 2.6km of temporary haul road accessing the site from Stone Gate is required to support all works associated with the construction of the Scheme (i.e. the Substation Works, Overhead Line Works and the Overhead Line Works modifications that fall under the exemption Regulations). Consent for this is sought under the Planning Application. Deemed approval is sought for a 28.26m length section of haul road located within the vicinity of the pylons will be used exclusively for the 2WS Overhead Line Works. The haul road route from Stone Gate has been developed in direct response to concerns raised during the targeted consultation regarding construction traffic utilising Marsh Road. After collating these comments, the construction routing strategy sought to divert heavy construction traffic away from more sensitive Marsh Road residential receptors. As part of the Planning Application, highway improvement and localised road widening works are proposed along Stone Gate to facilitate the safe operation of construction traffic. These works are designed to minimise disruption during the construction period and ensure the route functions effectively. While there are residential properties in the vicinity, Stone Gate also serves as access for Flamingo Flowers; a large flower processing/packing centre and is therefore already characterised by regular use by heavy good vehicles (HGVs). This existing use indicates that the route is of an appropriate standard and character to accommodate construction traffic. The anticipated increase in traffic during the construction phase has been assessed

	and it was concluded that, with the implementation of mitigation measures secured through the Outline Construction Environmental Management Plan ("OCEMP") and Construction Traffic Management Plan ("CTMP") (including routing strategies, traffic management, and control of construction activity), impacts on the local highway network and nearby receptors would not be significant. During the operational phase, the assessment confirms that there would be no unacceptable impacts on identified receptors as a result of traffic movements.
Cumulative impacts of the Weston Marsh Substation	A comprehensive report assessing potential cumulative effects of the Scheme alongside other relevant committed and planned schemes within the study area, including the Grimsby to Walpole DCO, Meridian and ODOW ("Cumulative Effects Assessment Report") was submitted as part of the Section 37 Applications. Whilst the identified developments may give rise to individual significant effects, the assessment robustly concludes that the Scheme does not give rise to any new or materially different significant cumulative effects when considered in combination. National Grid will seek to engage closely with projects in the wider vicinity, particularly those which interface with the Scheme, to manage appropriate phasing of construction activities and the mitigation measures identified within the OCEMP. Accordingly, the cumulative effects identified do not materially alter the overall planning balance or the conclusions of the assessment.
Siting of the infrastructure, particularly the pylons, in relation to residential properties and local businesses	Overall, there will be a net gain of three new pylons along the 2WS and 4ZM lines. The siting of the proposed pylons and Overhead Line Works has been informed as described above at 3.2.9 onwards. The alignment has been designed, wherever practicable, to remain alongside existing Overhead Line Works routes, thereby limiting effects on previously unaffected areas. The proposed pylons are

	located, where feasible, in proximity to existing infrastructure that is to be removed, representing a reorganisation rather than the introduction of a new overhead line infrastructure corridor. While connection points are influenced by the proposed substation, which is as close as possible to the Spalding tee-point, the design has been refined to minimise effects on nearby receptors through careful alignment and micro-siting. It is acknowledged that some receptors are located nearby; however, these are already located near to existing overhead lines.
Socio economics both positive and negative in relation to local employment, jobs and investment in the local area	In respect of the Section 37 Applications, the proposed works comprise modifications to existing overhead line infrastructure, including the removal and replacement of existing assets, with a limited net increase in pylons. Therefore, socio-economic effects specific to the Overhead Line Works will be limited. It is noted that the District Council's comments appear to consider socio-economic effects at the level of the overall Scheme rather than the specific scope of the Overhead Line Works.
Landowner compensation	As explained elsewhere in this Statement, compensation will be assessed and paid in accordance with the Compensation Code, ensuring that affected parties are fairly and properly recompensed for any losses incurred as a result of the Scheme.
Mitigation to be secured by conditions	National Grid agrees that the required mitigation measures (including a soil management plan, construction environmental management plan and landscape and ecological management plan) should be secured by condition.

8.3.8 The County Council objected to the Form B on two principal grounds relating to delivery programme and the adequacy of information supplied with the Form B. They formally requested that the Secretary of State holds a public inquiry before determining the Section 37 Applications.

County Council Objection	National Grid's Position
Delivery Programme of Works: It is considered that commencing the Scheme in line with the programme to achieve connection for ODOW by 2030 extends the overall construction period which would be avoided if the works were delivered within the Grimsby to Walpole DCO's construction period of 2029 to 2033 which would allow ODOW to be connected by 2031 resulting in a delay of 1 year and reducing the period of disturbance to local communities.	The Scheme is a standalone project for the purpose of connection of ODOW to the transmission system by 2030 (to be delivered whether or not the Grimsby to Walpole DCO is consented or delayed). This requirement is not discretionary but is driven by National Grid's agreement with NESO as described at paragraph 1.3 above. Any delays would have a material and detrimental impact to ODOW. The delivery timescales for the Grimsby to Walpole DCO also do not mean constant high intensity works in the Weston Marsh area throughout the whole period from 2029 to 2033 and in fact a more staggered approach to the construction programme would reduce peak traffic generation from the cumulative projects and minimise disruption to the local community. Potential construction impacts have been assessed and will be controlled by mitigation measures including the OCEMP anticipated to be secured by condition
Lack of sufficient information submitted with Form B: noting they were unable to fully assess the impacts of the development on highways, archaeology, ecology and flood risk	National Grid considers that the submission made to County Council was sufficient to discharge all of its responsibilities under Form B and in particular exceeded what would be required to inform a screening decision. However, the Section 37 Applications were accompanied by an Environmental Assessment Report ("EAR") providing an appraisal of the environmental effects. This information has been sent to the County Council who has been invited to review the further information and update their position on the scheme. National Grid has also re-consulted with statutory bodies including Natural England, Lincolnshire Wildlife Trust and the Environment Agency.

Object to the approach to screening and consider the Scheme to form part of the Grimsby to Walpole DCO: 1) That the works within the Section 37 Applications (and the Scheme as a whole) should be treated as part of a wider project; it is understood that the County Council believe the project is the Grimsby to Walpole DCO. 2) To advance the elements of the Scheme to deliver the connection for ODOW ahead of the Grimsby to Walpole DCO compromises the EIA Regulations. 3) The individual components of the Scheme should not be considered separately. 4) The Scheme should be subject to an EIA as it would be if it was assessed as part of the wider Grimsby to Walpole DCO project. 5) When considered with all the other proposed infrastructure in the locality (ODOW, Meridian Solar, Eastern Green 3 and 4 and Western Marsh to East Leicestershire) the cumulative impact of these other projects makes the Scheme an EIA development due to the significant cumulative impact on the environment of all of these projects.	It is noted that this is not an objection to the Scheme in itself but to the manner in which environmental impact assessment ("EIA") has been considered. National Grid has responded in much more detail on these points. However, in summary their position is: 1) The Scheme is a standalone project for the purpose of connecting ODOW. Accordingly, only the components associated with this objective (i.e. the components of the Scheme) are included within the screening boundary. 2) The Overhead Line Works and Substation Works are being promoted as a standalone Scheme under separate statutory consenting regimes and are not intrinsically part of the Grimsby to Walpole DCO. Whilst there may be functional and geographical parallels between the two, this does not automatically group them into a single project for EIA purposes, as explained above. The EIA Regulations are not compromised. 3) The individual components of the Scheme are all required to be subject to different consenting approaches. It is acknowledged that the elements are linked and dependent on each other; it is anticipated that the consents will be conditional on each other. The EIA Regulations do not restrict the submission of applications under different regimes but require a project's likely significant effects on the environment are assessed. In terms of EIA screening, this is being undertaken for each consent by considering the whole Scheme in its entirety rather than considering each element in isolation. 4) The Scheme is a standalone development. The fact of the Grimsby to Walpole DCO is irrelevant to this process. Therefore, the Scheme must be consented with reference to the relevant EIA Regulations. 5) A Report to Inform Screening Decision was submitted for the Section 37 Applications and includes consideration
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	of potential cumulative effects which could result from the Scheme in combination with other existing and/or approved development. This includes Outer Dowsing, Meridian Solar Farm, Eastern Green Link 3 and Eastern Green Link 4, Grimsby to Walpole and Weston Marsh to East Leicestershire Project. A Cumulative Effects Assessment Report has also been submitted. The Cumulative Effects Assessment Report has assessed the potential for significant cumulative effects from the Scheme alongside 19 other developments (including those listed above). It is acknowledged that a number of the other developments considered, including Meridian Solar Farm and ODOW, would themselves result in significant environmental effects. However, these effects have previously been fully assessed within the relevant Environmental Statement documentation and considered by the Planning Inspectorate and other consenting authorities. For the purposes of determining whether the Scheme constitutes EIA development, the consideration of the cumulative effects should consider the characteristics of the proposed development and its potential impacts, taking into account cumulation with other existing, and or approved development. As set out within the Cumulative Effects Assessment Report, significant cumulative environmental effects as a result of the Scheme in combination with other committed developments are not expected.
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8.3.9 The District Council and County Council received consultation responses from Historic England, the Environment Agency, Natural England, Weston Parish Council, the District Council's environmental protection and ecology, Lincolnshire Wildlife Trust, Reading Agricultural Consultants, Lincolnshire Police and County Council's ecology, highway, historic places and minerals leads in terms of the Form B. Historic England, Lincolnshire Police and Minerals and Waste confirmed no objections or concerns. The remainder of the representations and National Grid's position on them are summarised below:

Consultee	Summary of Issue	National Grid Position
Natural England	Full ecological assessments not provided limiting	Following the Form B consultation, the Section 37 Applications were made, accompanied by an

	Natural England's ability for a detailed response.	Environmental Assessment Report which provided a detailed appraisal of the environmental effects. This information has been provided to consultees.
	Design, Control and Mitigation Measures – no discussion of monitoring to ensure efficacy of management plans in mitigation of impacts.	Initial proposal for control is included in outline construction environmental management plan and landscape and ecology management plan as submitted in support of the Section 37 Applications. Compliance can be secured by condition.
	Cumulative assessment – provisional assessments of cumulative impacts are noted but will review further when full assessments have been submitted	A standalone Cumulative Effects Assessment Report considering the Scheme in its entirety was submitted with the Section 37 Applications and is available for further review. It is also noted that the HRA Stage 1 Screening Assessment also considers in-combination effects.
	Internationally designated sites – noted sensitive noise receptors and impacts from lighting to be assessed	There are no operational lighting requirements for the Overhead Line Works; these are limited to temporary construction task/security lighting. However, both the HRA Stage 1 Screening Assessment and the Environmental Assessment Report consider the potential disturbance due to lighting noise and other potential direct impacts. The OCEMP (anticipated to be secured by condition) includes measures to minimise obtrusive light spillage and best practicable means to reduce noise and vibration.
	Soils and Agricultural Land - no outright commitment to return any temporarily impacted soils to their original Agricultural	A soil management plan (" Soil Management Plan ") has been provided considering the Scheme in its entirety; it is anticipated the final soil

	Land Classification (ALC) grade	management plan will be secured by condition.
	Air Quality: advises that the potential for air quality needs to be assessed	An air quality assessment accompanied the Section 37 Applications, considering the scheme in its entirety. It is noted that vehicular tail-pipe emissions released by construction vehicles associated with the Scheme using the local road network are screened out of the assessment. This is based upon a review of the construction traffic data supplied by the Contractor. Specifically, the predicted change in traffic flows during the construction phase will not exceed the screening thresholds outlined in the relevant assessment guidance. Therefore, a detailed air quality assessment is not required.
Environment Agency	The submitted Flood Risk Assessment (FRA) does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist.	The Overhead Line Works result in a net increase of three open lattice pylons within the defended floodplain. These are considered to have a negligible impact upon flood risk within the defended floodplain. A detailed FRA was submitted with the Section 37 Application which complies with the requirements for site-specific flood risk assessments, as set out in documents referred to. Hydraulic modelling of the River Welland has been undertaken to support the detailed FRA. This includes the 1 in 1000 year plus climate change (design flood event) overtopping scenario and 1 in 1000 year plus climate change breach scenario.
	The proposed development may require an Environmental Permit from the Environment	It is noted that certain works associated with the Exempt Overhead Line works component of the Scheme are

	Agency for works within 8 metres of the River Welland or within the floodplain of a main river, which is separate from and in addition to planning permission.	in close proximity to the River Welland. If required, an Environmental Permit application would be submitted to the Environment Agency at the appropriate time.
	Water voles are a legally protected species under the Wildlife and Countryside Act 1981. The development is only considered acceptable if impacts on water voles are avoided or adequately mitigated.	Further surveys have been undertaken, and no evidence of water voles has been found.
	A sufficient buffer should be maintained between development, fencing, and any watercourse or ditch, with a minimum distance of 10 metres from the bank-top along the River Welland and associated IDB-maintained drains.	The OCEMP includes measures to control potential impacts upon watercourses, including potential pollution. These measures include provision of suitable buffers as far as reasonably practicable. Appropriate buffers will be applied to protect watercourses and water quality - particularly against construction run-off and to support local biodiversity as described in the Anglian River Basin Management Plan. 10 m buffers will be applied where reasonably practicable. However, buffers may not be viable in all instances given that direct interaction with a number of existing watercourses is required to implement the Scheme.
Lincolnshire Wildlife Trust	Comprehensive ecological baseline for all impacted areas assumed; noting that the site is in proximity to several protected sites, including The Wash SPA, SAC, Ramsar, and SSSI. Additionally, it should be ensured that the biodiversity metric	Comprehensive ecological surveys have been undertaken to inform design development of the Scheme and the associated management and mitigation measures. The ecological impacts of the Overhead Line Works are assessed in the EAR. A BNG Assessment was produced specifically for those

		includes details of how at least 10% biodiversity net gain (BNG) can be achieved with the creation of habitats at a realistic condition.	elements of the Scheme which require consent under the Town and Country Planning Act 1990.
Reading Consultants	Agricultural	Lack of consideration of the likely impacts on the affected farms. Land holdings (as a receptor) are considered to have a low sensitivity. There is no justification given for this low rating	As a whole, land impacted by the Scheme is predominantly arable, with small sections of woodland and grassland. Given this predominant land use, land holdings, as a receptor, are considered to have a low sensitivity. This is based upon the Design Manual for Roads and Bridges (DMRB) LA112 - Population and Human Health, which is the relevant guidance for the assessment of impacts upon land holdings, as receptors, draws upon. The details within the OCEMP can be secured by condition. The EAR confirmed land required temporarily would be reinstated to its pre-construction condition and impacts on individual agricultural businesses would be dealt with through financial compensation in accordance with the Compensation Code (which would include consideration of any active agri-environment and/or forestry/woodland schemes). An Agricultural Land Classification (ALC) Report accompanies this application. Mitigation and management measures for all soil handling operations are set out in the Soil Management Plan, using soil data from the ALC, surveys which have been completed to inform the report.

		The OCEMP sets out general requirements relating to communications and engagement with affected parties and management of potential amenity impacts. National Grid is in dialogue with affected landowners and will continue to liaise with these parties with the objective of minimising adverse impacts on operations as far as practicable.
Weston Parish Council	Concern around predetermination. Suggests determination of the Section 37 Applications risk prejudicing the outcome of the associated Planning Application.	The Overhead Line Works are components of the wider Scheme, which includes the Substation Works. Delivery of the Scheme in its entirety is contingent upon all necessary consents being secured.
	Concern around segmented approach /salami-slicing).	The Scheme in its totality is a standalone development to enable connection of ODOV to the national electricity transmission system. The Grimsby to Walpole DCO is a related but separate development.
	Concern around failure to require EIA.	In accordance with regulations 10 and 11 of The Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2017, a request for a Screening Decision from the Secretary of State for the Energy Security and Net Zero is made alongside the Section 37 Applications and is supported by the Report to Inform Screening Decision.
	Conflict with National Planning Policy Framework ("NPPF") provisions including Para 180 /Conserving and Enhancing the Natural environment), Para 187 /BMV Agric Land), Para 174	The NPPF was a key consideration in the preparation of the Section 37 Applications and National Grid conclude that the Overhead Line Works do not conflict with the NPPF.

	/Recognising Intrinsic Character of the Countryside) and Para 185 /Cumulative Impacts)	
	Failure of Landscape and Visual assessment - concern that the assessment does not meet the standard of a robust LVIA required by GLVIA3.	A Landscape and Visual Appraisal accompanied the Section 37 Applications and considers the Scheme in its entirety. The Landscape and Visual Appraisal has been undertaken in line with relevant guidance including the Landscape Institute and Institute for Environmental Management and Assessment /Institute of Environmental Management and Assessment (IEMA) (2013) Guidelines for Landscape and Visual Impact Assessment - 3rd Edition (GLVIA3)
	Concerns around use of Section 37 and deemed planning permission and suggests that this 'circumvents the full application of local planning control', limits community engagement and risk approval of ancillary works without proper scrutiny	Section 37 is a statutory consenting process and does not circumvent scrutiny or public engagement. The Section 37 Applications are subject to statutory consultation, full environmental assessment, and determination by the Secretary of State, who may impose conditions. Any deemed planning permission for ancillary works forms part of the same assessed and consulted upon scheme and is subject to appropriate controls.
	Concern that the application may rely on compulsory purchase which raises concerns around certainty and delivery of the scheme and appropriateness of granting consent.	The use of compulsory purchase powers is subject to the test of being a compelling case in the public interest: there will also need to be sufficient certainty that consent for the scheme will be granted. The Section 37 Applications are assessed on their own merits, including deliverability and need, and, similarly, consent will only be granted where there is sufficient certainty that the scheme can be implemented appropriately. The issuing of

		any planning consents will be withheld until such time as the Order is formally confirmed.
County Council Ecology	Presence of sites designated for highly mobile species such as birds: requirement to identify potential impact pathways for these sites and their interest features, analyse potential impacts with associated avoidance and mitigation measures.	An HRA Stage 1 Screening Assessment has been undertaken which considers the Scheme in its entirety, inclusive of two specific components of Overhead Line Works. The HRA Stage 1 Screening Assessment is submitted alongside the EAR in support of the Section 37 Applications. The potential impact pathways considered in the HRA Stage 1 Screening Assessment includes loss of functionally linked habitat, disturbance displacement, injury/mortality, changes in water quality and quantity, barriers to movement and emissions. Following an appraisal of the Habitats Sites regarding the relevant impact pathways, it has been concluded that likely significant effects of the Scheme can be excluded in relation to all pathways. Therefore, all elements of the Scheme were screened out from a more detailed Appropriate Assessment under HRA.
	Cumulative: There are several development proposals of varying scales in the vicinity of the proposal. These range from small scale housing developments to nationally significant infrastructure project scale energy developments.	A stand-alone Cumulative Effects Assessment Report supports the Section 37 Applications and considers the Scheme in its entirety. This assessment considers potential inter-project cumulative effects, which could occur where a single receptor experiences effects from a number of separate developments, including the Scheme and other committed developments in the Weston Marsh area. It is also noted that the HRA Stage 1 Screening Assessment

		considers in-combination effects.
	Habitats Regulations Assessment (HRA) may be required.	A HRA Stage 1 Screening Assessment was submitted with the Section 37 Applications.
	BNG Assessment: No details of how any gains will be achieved. A MoRPH assessment will be required to calculate baseline river units where watercourses (with the exception of ditches) are present in or adjacent to the proposed application boundary.	The Overhead Line Works are not subject to mandatory requirements to deliver a 10% gain in net biodiversity value. A BNG Assessment has been produced for those elements of the Scheme which require consent under the Town and Country Planning Act 1990. This includes River Condition Assessment data. The Overhead Line Works have been designed and planned to minimise impacts upon existing habitats. Habitats which are directly impacted by the temporary construction works (e.g. that within new pylon footprints), would be reinstated following the completion of construction.
County Council Highway Authority and Lead Local Flood Authority	Highways impact: <u>there is no technical information on which to make an assessment</u>	A Transport Statement was submitted in support of the Section 37 Applications. The CTMP was also submitted in support of the Section 37 Applications. It is envisaged that the agreement of the final CTMP will be secured by condition requiring discharge prior to commencement of works.
County Council Historic Places	Insufficient specific information on the archaeological potential for the site and the extent of impact to buried archaeological remains from the proposed development	A Historic Environment Desk Based Appraisal (DBA) is provided in support of the necessary consent applications, which considers the Scheme in its entirety, inclusive of the specific components of the Overhead Line Works. The results of the desk-based research, aerial photographic,

		geoarchaeological and geophysical surveys evidence collated to inform the Historic Environment DBA were discussed with County Council's Archaeological Advisor following this consultation. A number of surveys remain ongoing, including trial trenching and geophysical surveys. It is envisaged that the details of required surveys can/will be secured by condition.
District Council Ecology	Considered the information in the environmental report to be accurate at the time, but provided little data at that stage to assess ecological impacts or determine appropriate mitigation	Further, more detailed information has been submitted with the Section 37 Applications in the form of the EAR.
District Council Environmental Protection	Requested that the Secretary of State consider the potential impacts from lighting, noise and vibration, air quality and cumulative effects.	Further, more detailed, information has been submitted with the Section 37 Applications in the form of the EAR.
The District Council received 58 Objections including from Lincolnshire Against Needless Destruction and Meridian Action Group	Project Fragmentation between different consenting regimes and different pieces of infrastructure.	The different elements of the Scheme are required to be consented by different regimes. It is anticipated that the consents for the Substation Works and the Overhead Line Works will each be conditional upon the grant of the other.
	EIA Compliance in respect of cumulative impacts particularly Weston Marsh Substation.	It is considered that EIA is not required. However, a standalone Cumulative Effects Assessment Report has been submitted with the Section 37 Applications.
	Procedural Prematurity in advance of the submission of the	The Planning Application for the Substation Works has now been submitted.

	Planning Application for the Substation Works.	
	Permanent Loss of Best and Most Versatile Agricultural Land.	See first point of table at 8.3.6
	Landscape and Visual Impact.	A Landscape and Visual Appraisal accompanied the Section 37 Applications and concluded a minor adverse effect at most.

8.3.10 It can be seen that many of the comments related to the amount of information submitted with the Form B. Since the provision of the Form B information, more detailed environmental information has been provided as part of the formal Section 37 Applications, and both local authorities and other stakeholders have had further opportunity to consider and consult on this.

8.3.11 National Grid considers that the issues raised by the local authorities and consultees are capable of resolution, particularly following the provision of more detailed information alongside the Section 37 Applications, but also for the other reasons explained in the tables above. In respect of the County Council's objection relating to the delivery programme of works is not accepted as a valid reason to refuse consent for any element of the Scheme. It is considered that securing the grant of consent for the Proposed Overhead Line Works is unlikely to present an impediment to the delivery of the Scheme and notwithstanding the objections, National Grid is not aware of any reasons why consent pursuant to Section 37 Applications and the related deemed planning permission would be withheld.

Exemption Regulations

8.3.12 Pursuant to the Overhead Lines (Exemption) (England and Wales) Regulations 2009, the Exempt Overhead Line Works are exempt from requiring approval from the Secretary of State and under section 37 of the 1989 Act.

8.4 Other Consents

Highways Orders

8.4.1 The Scheme will require a small number of highway orders, in the form of temporary Traffic Regulation Orders, along with certain other conventional highways consents, such as a section 278 agreement, which the contractor may from time to time seek to obtain from the relevant highways authority.

8.4.2 The proposed development requires the temporary closure and diversion of certain Public Rights of Way (PRoWs) within the project area to facilitate the safe construction of the Scheme. These measures are necessary to ensure public safety and to allow construction activities and to be undertaken efficiently and the PRoWs can remain in use post development.

- (a) To the north of the River Welland, PRoW ID Surf/3/3 will be affected by a temporary closure of within Plot 01-008, with a diversion route provided via Plot 01-009.
 - (b) Situated between Marsh Road and Carrington Road, PRoW ID Wstn/7/1 will be affected by a temporary closure within Plots 01-043, 01-042 and 01-033 associated with the construction of the substation. The proposed alternative route will be provided through Plots 01-034 and 01-032.
- 8.4.3 It is anticipated that the remaining Public Rights of Way in the Order Land will remain open and will therefore not require closure or diversion as a result of the construction or development of the Scheme:
- a) PRoW ID Moul/2/1, which cross Crown Land within Plots 02-019, 02-018, 02-017, 02-016 and 02-014, will remain open and accessible throughout the construction period
 - b) PRoW ID Wstn/8/1 at Crowtree Farm, within Plot 01-041, will not require closure and will also continue to be available for public use.
- 8.4.4 PROW ID Wstn/6/2 along the south of the River Welland within Plot 01-016 will not require closure and will also continue to be available for public use.
- 8.4.5 These highways orders will be required in respect of overhead line removal, replacement, installation, and the construction of the Substation. Given the programme for those works, the orders are not proposed to be sought by National Grid until nearer the commencement date.
- 8.4.6 In any event, the highways orders and other consents are standard consents, and are unlikely to present an impediment to the delivery of the Scheme.

9. FUNDING AND DELIVERY

9.1 Timetable for delivery

- 9.1.1 National Grid proposes to let a contract specifically for the Scheme.
- 9.1.2 National Grid will have a preferred bidder as main contractor further to its competitive tender and expect the contract to be awarded when preliminary surveys and works will commence, subject to securing necessary consents. The main construction works are anticipated to commence in 2028.
- 9.1.3 Subject to securing all necessary approvals and consents, National Grid currently estimates that on-site works forming part of the Scheme will commence in 2028 and will take approximately 2 years to complete.

9.2 Funding

- 9.2.1 National Grid is regulated by its economic regulator, the Office for Gas and Electricity Markets ("**Ofgem**").

RIIO Mechanism

- 9.2.2 In 2013, Ofgem introduced a new regulatory framework called RIIO (Revenue = Incentives + Innovation + Outputs) that became effective on 1 April 2013. The first RIIO period (RIIO-T1) lasted eight years, followed by a second RIIO period, RIIO-T2, which lasted five years from 1 April 2021. RIIO-T3 began on 1st April 2026 and will also last five years. It puts in

place funding arrangements to allow National Grid to discharge its duties as transmission operator and owner.

9.2.3 The framework includes mechanisms to be reimbursed for the capital costs of constructing new transmission equipment, and for associated costs including compulsory acquisitions and foreseeable incidental costs.

9.2.4 National Grid has access to regulatory funding mechanisms within the RIIO-T3 Framework, in order to progress the Scheme and fulfil its contractual obligations.

9.3 National Grid will be submitting its construction funding request for the Scheme, to Ofgem in Quarter 4 of 2027. Currently the Scheme has access to both Pre Construction Funding and Early Construction Funding through the Accelerated Strategic Transmission Investment (ASTI) framework as it can form part of the facilities required for the Grimsby to Walpole project. Further funding applications will be made at the relevant times. The funding applications will cover both the acquisition of land and rights for the Scheme and the implementation, construction and delivery of the Scheme itself.

9.3.1 National Grid's ability to convert revenue to cash is an important factor in the ongoing reinvestment in its business. Securing low-cost funding, carefully managing its cash flows and efficient development of its networks are essential to maintaining strong sustainable returns. Cash generation is underpinned by agreeing appropriate regulatory arrangements. It is through this business model, with a mixture of revenue, investment, and cash flow, that it is able to fund major infrastructure projects, including the Scheme.

9.3.2 Furthermore, National Grid have significant financial standing with a net asset figure on the balance sheet of the 2022/23 Accounts being £4,453 million, which ensures that sufficient funding could be made available immediately at the time that the Order enabled the exercise of compulsory acquisition powers.

9.4 Statement Justifying Extent of Scheme to be Disregarded for the Purposes of Assessing Compensation in the No Scheme World

9.4.1 Section 6A of the Land Compensation 1961 ("LCA 1961") provides that "*the no scheme principle is to be applied when assessing the value of land in order to work out how much compensation should be paid by the acquiring authority for the compulsory acquisition of land.*"

9.4.2 For the purposes of s.6A, it is therefore a requirement to include in a Statement of Reasons the extent of the Scheme to be disregarded for the purposes of assessing compensation in the "No Scheme World".

9.4.3 In most cases the 'scheme' means the scheme of development underlying the acquisition and provided for by the Order unless it is shown that the underlying scheme is larger than, but incorporating the scheme provided by the Order.

9.4.4 In the case of the Scheme, the 'scheme' is the project to deliver the Weston Marsh Substation A and related works to Overhead Lines as a whole which is in part enabled by the Order.

10. ALTERNATIVES TO THE ORDER

10.1 No Action

- 10.1.1 This is not a realistic alternative option given the urgent and compelling need for the new Substation in order to connect renewable energy to the Grid and deliver a 3% contribution towards off-shore wind targets which also support the Government's Clean Power 2030 Action Plan objectives. The "no action" option also does not comply with National Grid's Standard Licence Condition C8 – the requirement to offer terms for connection and its contractual commitment to NESO (and subsequently to ODOW) to do so.

10.2 Options Appraisal

- 10.2.1 Paragraph 3 (Justification) explains the reasoning for the Scheme being promoted at this point.
- 10.2.2 This paragraph summarises the options that were considered in developing the detailed proposals.
- 10.2.3 The siting of a substation at Weston Marsh was first considered by National Grid in the Strategic Options Report undertaken for the Grimsby to Walpole DCO in 2023. At around the same time, ODOW was also considering site selection and alternatives as part of its Preliminary Environmental Information Report, which also included consideration of the location of the National Grid substation connection point. A site search and appraisal undertaken by ODOW identified a number of possible sites within a wider zone at Weston Marsh, narrowing down to two preferred options, one of which was broadly similar to the site for the Scheme.
- 10.2.4 The CPRSS set out the preliminary corridor options, preliminary siting zones and preliminary siting areas and undertook a comparative assessment of these to identify National Grid's proposed corridor, siting zones and siting areas and the broad location of the infrastructure required. One component of this project was the new Weston Marsh substation (known as Weston Marsh Substation A) located in the vicinity of the Spalding Tee-point. In relation to the siting of the new Weston Marsh Substation A discussions were also held with ODOW in order to collaborate on the identification of a suitable site.
- 10.2.5 The emerging preference for the new Weston Marsh Substation A was for it to be located south-west of the Spalding Tee-Point where the existing 400 kV 4ZM and 2WS overhead lines intersect. The siting of the new Weston Marsh substation in that location was identified as representing the greatest opportunity to limit the spread of environmental effects, overhead line deviations of two existing overhead lines, and reduce technical complexity during construction and operation and minimise the extent of diversions by siting closest to the Spalding Tee-Point. It was identified that this substation could allow the connection of ODOW.
- 10.2.6 An initial search area of 5km from the Spalding Tee-Point was considered, identifying various locations for the new Weston Marsh Substation, as follows:
- (a) Siting zone WMZ1 - an area, approximately 3.8 km by 1.7 km, located north of the River Welland. The Risegate Eau waterbody crosses from north-west to south-east, and the A16 and 400 kV 4ZM overhead line crosses the west of the siting zone;
 - (b) Siting zone WMZ2 – an area, approximately 5.2 km by 2.1 km, located east of the River Welland (which is at the west of WMZ1) and at the Spalding Tee-Point. The 400 kV 4ZM and 2WS overhead lines cross the centre and east (respectively) of the siting zone;

- (c) Siting zone WMZ3 – an area, approximately 3.4 km by 2.3 km, located adjacent to the Spalding Tee-point. The 400 kV 4ZM overhead line crosses the centre of the WMZ3 and the 400 kV 2WS overhead line is adjacent to the east of the siting zone; and
- (d) Siting zone WMZ4 – an area, approximately 3.2 km by 3.7 km, located north-east of the Spalding Tee-Point. The B1357 and A17 cross the centre of the WMZ4 from north to south.

10.2.7 Each of the options was considered against environmental factors (including landscape and visual, ecology, historic environment, air quality, noise and water), socio-economic and technical issues, the potential impacts on relevant receptors, and whether such effects could be avoided or mitigated through careful siting. Four siting zones were considered as shown on Figure 1.

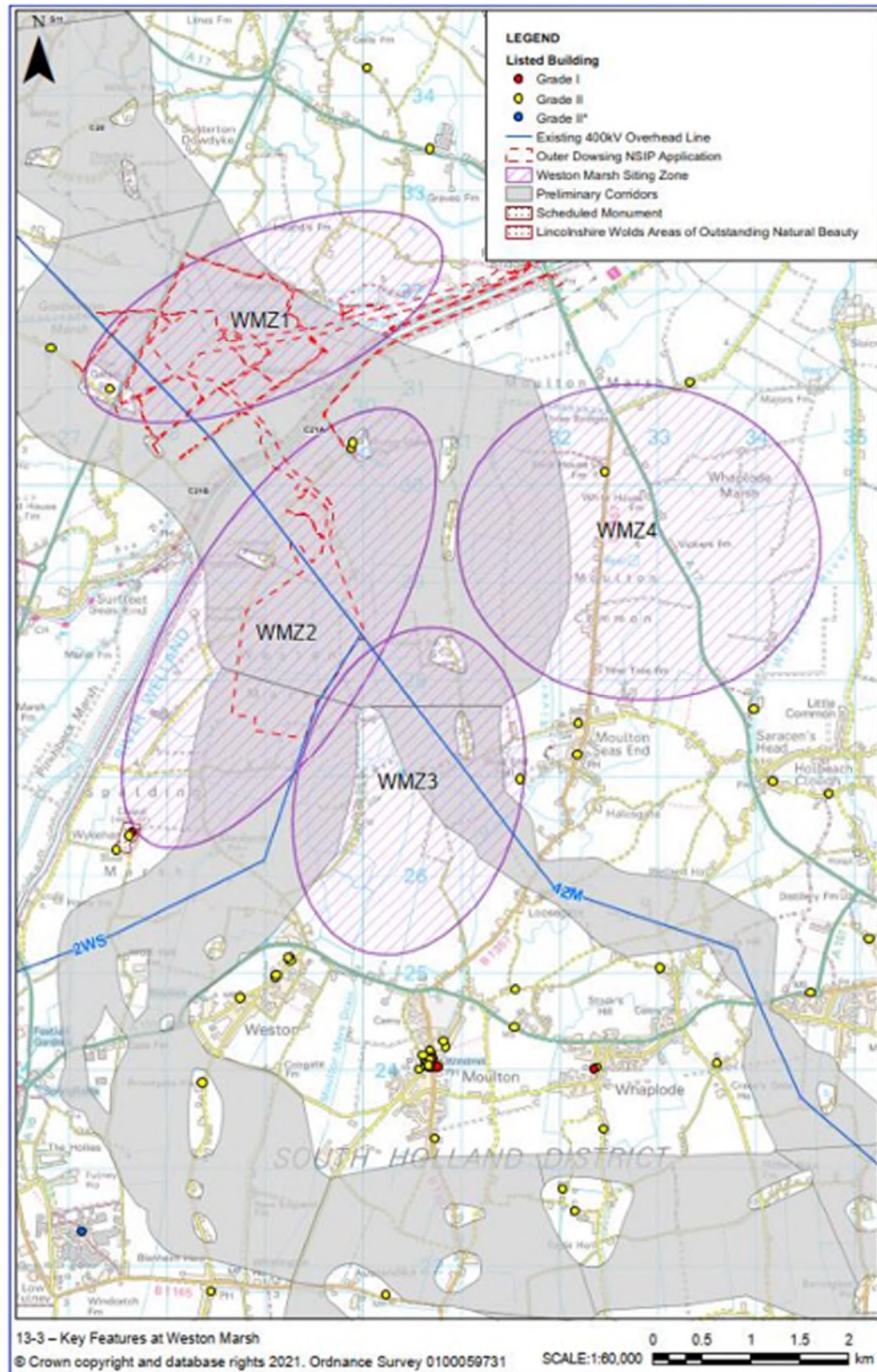


Figure 1: Figure 13.3; Key Features at Weston Marsh from CPRSS

10.2.8 This concluded that siting zone WMZ4 was the least environmentally preferred due to its proximity to the Wash designated sites and length of diversions required, as well as being

a greater intrusion of infrastructure into the surrounding environment. WMZ1 was more distant from heritage assets but would require a longer diversion over the River Welland, likely on taller pylons and may interact with the siting of ODOW's substation which was proposed to be sited at Surfleet Marsh. Siting Zones WMZ2 and WMZ3 provided a possibility to limit the works and complexity for overhead line diversions given their proximity to the Spalding Tee-Point. There was found to be little to choose between WMZ2 and WMZ3 (assuming careful siting); WMZ2 was marginally preferred from an environmental perspective and WMZ3 was marginally preferred from a technical perspective. Both offered the best opportunities for flexible siting whilst reducing the intrusion of infrastructure, and therefore environmental impacts (in line with the Horlock Rules) into the surrounding area. An area encompassing WMZ2 and WMZ3 was identified as the emerging preference to best align with the Horlock² and Holford³ Rules. This was because the identified siting zone offered the greatest opportunities to limit the spread of environmental effects, shortest overhead line deviations of two existing overhead lines, and reduced technical complexity during construction and operation (compared to WMZ1 and WMZ4) by siting closest to the Spalding Tee-Point.

- 10.2.9 Once the preferred siting zone had been identified, a graduated swathe was shown within it, to show the current thinking as to where the substation was most likely to be located. This is shown on Figure 2.

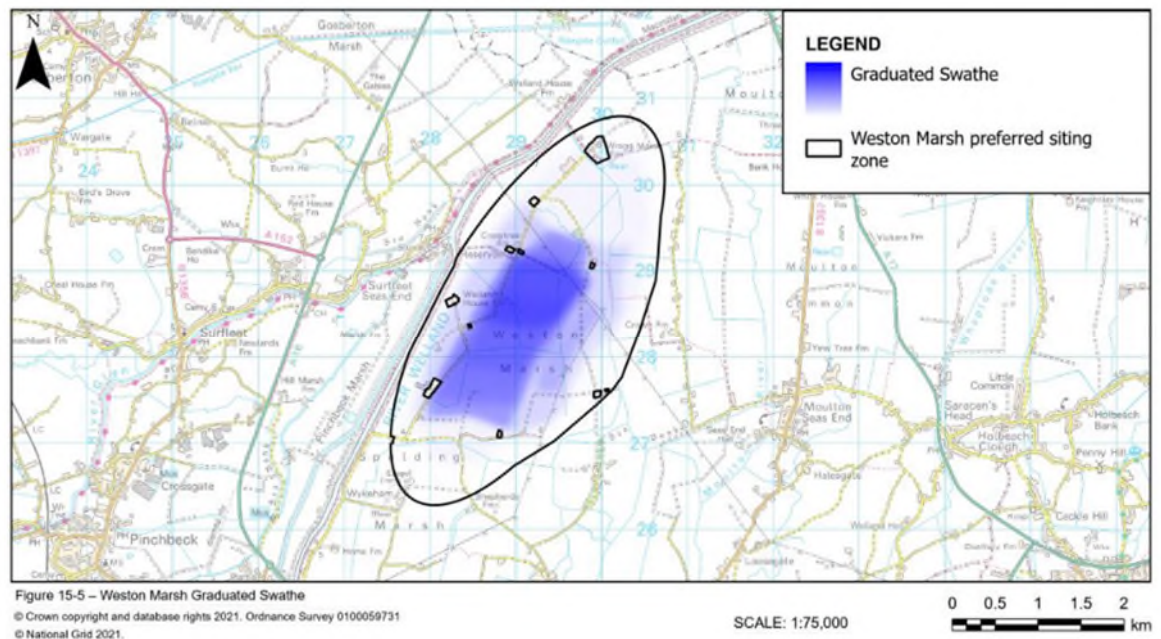


Figure 2: Weston Marsh Graduated Swathe image 15.5 CPRSS

- ² National Grid devised the Horlock Rules in 2003 and these were subsequently updated in 2009. They provide guidance for the siting and design of new substations, or extensions to existing substations, to avoid or reduce the environmental effects of such developments. The Horlock Rules facilitate the consideration of environment and amenity during the design and siting of new substation infrastructure.
- ³ Guidelines on overhead line routeing were first formulated in 1959 by Sir William Holford, as advisor to the Central Electricity Generating Board. Holford developed a series of planning guidelines in relation to amenity issues, that have subsequently become known as the Holford Rules. The guidelines provide a set of design criteria that have become accepted industry best practice in overhead line routeing.

- 10.2.10 The Weston Marsh Siting Study Report, which was published as part of the targeted consultation undertaken in November to December 2025, confirmed the preferred location for Weston Marsh Substation A, within the graduated swathe. This is shown on Figure 3.

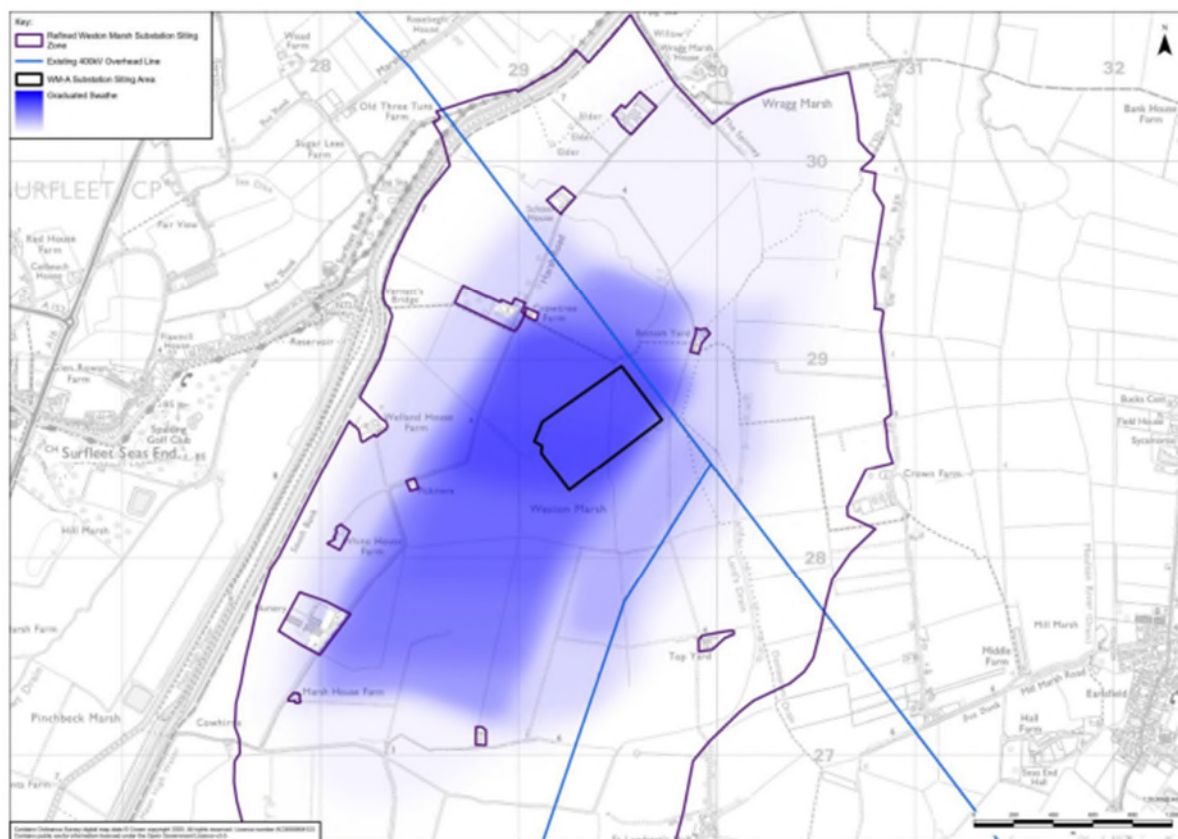


Figure 3: Weston Marsh A Siting Area (Image 9 of Weston Marsh Siting Study Report).

- 10.2.11 Designs of the Weston Marsh Substation A were then developed in accordance with National Grid Standards and specifications which ensure that new sites can be constructed, operated and maintained safely. They have been designed as Air Insulated Switchgear rather than Gas Insulated Switchgear. AIS technology uses atmospheric air as an insulation medium between the electrical equipment in the substation, whereas GIS technology seals electrical equipment in pressured chambers filled with insulating gas. AIS technology usually requires a larger footprint than GIS with substation equipment typically located outdoors and requiring greater separation distances between each other to maintain electrical isolation, whilst for GIS, equipment is usually much closer together and enclosed within a building. In the absence of any requirements to use GIS, AIS was chosen as GIS is considered to have a greater impact on views and landscape character due to the height and scale of the building surrounding equipment.
- 10.2.12 An AIS substation is constructed with switchgear which relies on open air components, which can require large clearance areas for operation and safety, which takes up a larger area of land compared to a GIS substation. AIS substations are typically lower cost and typically involve less construction time, with fewer components required and easier maintenance. A GIS substation is constructed with switchgear using gas filled components, which allows operation and safety clearances to be reduced when compared to an AIS substation. However, they tend to be more costly, require specialised operation and maintenance, have longer outage repair times and typically require the use of sulphur

hexafluoride (SF6) - a greenhouse gas that has a global warming impact 22,800 times that of carbon dioxide. National Grid policy generally precludes the use of gas insulated technologies due to the negative environmental impacts of SF6 based insulation gases, the reduced operational maintainability of the technology when compared to AIS, and the significantly increased cost of gas insulated equipment.

- 10.2.13 National Grid has demonstrably considered reasonable alternatives, both in terms of location and technology, and has not dismissed other sites without detailed examination. The selection of the location for the Scheme reflects a proportionate balance between minimising impacts and meeting the need to facilitate the connection of ODOW into the Transmission System.

11. HUMAN RIGHTS & EQUALITY ACT 2010 CONSIDERATIONS

11.1 Human Rights Implications

- 11.1.1 The European Convention rights potentially applicable to the making of the Order are Articles 6 and 8 and Article 1 of the First Protocol (as contained in Schedule 1 to the Human Rights Act 1998).
- 11.1.2 Relevant parts of Article 1 of the First Protocol of the Convention provide:
- "Every natural or legal person is entitled to peaceful enjoyment of his possessions" and "no one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law".*
- 11.1.3 Relevant parts of Article 8 of the Convention provide:
- "1. Everyone has the right to respect for his private and family life, his home and his correspondence.*
- 2. There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of ... the economic well-being of the country ..."*
- 11.1.4 The Order has been made pursuant to Section 10 and Schedule 3 of the 1989 Act which authorises National Grid to acquire land and new rights compulsorily subject to following the procedures laid down in the 1981 Act.
- 11.1.5 National Grid is taking a proportionate approach to compulsory acquisition. Rather than acquiring the freehold title to all land comprised within the Order limits, National Grid is seeking to acquire a combination of freehold title only where required for permanent above-ground infrastructure where the use and nature of the land is permanently changed; specifically the Weston Marsh Substation A, access roads, associated landscaping and environmental mitigation and permanent rights, such as the rights to provide temporary constructions compounds and accesses.
- 11.1.6 National Grid is seeking to acquire only those parcels of land and/or new rights which are absolutely necessary to facilitate delivery of the Scheme.
- 11.1.7 National Grid considers that there is a compelling case in the public interest that the new rights and land referred to in the Order be acquired in order to achieve the purposes described in this Statement.

- 11.1.8 If the Secretary of State agrees with National Grid that there is a compelling case in the public interest, he or she may confirm the Order.
- 11.1.9 If the Order is confirmed, compensation in line with the Compensation Code, may be claimed by persons whose interests in land have been acquired or whose possession of land has been disturbed proportionate to any losses that they incur as a result of the acquisition.
- 11.1.10 In the circumstances, if the Order is confirmed, it is considered that the compulsory acquisition of the land and new rights referred to in the Order will not conflict with Article 1 of the First Protocol or Article 8 of the European Convention as any interference with the rights will be in accordance with the law, justified and proportionate.
- 11.1.11 The relevant part of Article 6 provides that:
- "1. In the determination of his civil rights and obligations ... everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law."*
- 11.1.12 So far as the Order is concerned, any owner, lessee or occupier of land included in the Order will be notified and may have the opportunity to make representations to the Secretary of State and to be heard at a public inquiry before a decision is made as to whether or not the Order should be confirmed, and would in any event have legal rights under the 1981 Act to challenge any order made on the relevant statutory grounds.
- 11.1.13 National Grid is satisfied that there are no planning or financial impediments to the implementation of the Scheme and that the Scheme is therefore likely to proceed if the Order is confirmed.
- 11.1.14 For the reasons set out above, there is considered to be a compelling case in the public interest to proceed with the Order to facilitate the operation and decarbonisation of the electricity transmission network. Furthermore, the Order is required to enable the connection of ODOW onto the Transmission System by the agreed connection date of 2030. ODOW has entered into a connection agreement with the National Energy System Operator ("NESO"). ODOW's connection onto the Transmission System must be made available, pursuant to the connection agreement, by 2030.

11.2 Equality Act 2010

- 11.2.1 Section 149 of the Equality Act 2010 requires due regard to be given to the need to:
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it; and
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 11.2.2 The relevant protected characteristics are: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 11.2.3 Although National Grid is not directly subject to the public sector equality duty under section 149 of the Equality Act 2010 ("**PS**ED"), information is provided in relation to the Scheme's

interaction with it to assist the Secretary of State with their discharge of that duty. An Equality impact Assessment has been undertaken which demonstrates how National Grid has had regard to the protected characteristics of landowners, and the measures taken to mitigate any impacts as far as is reasonably practicable. The remaining residual (both adverse and beneficial) equality impacts following mitigation are limited.

- 11.2.4 In light of the above, National Grid considers that the Order is appropriate in the context of the public sector equality duty set out in Section 149 of the Equality Act 2010.

12. CONCLUSION

- 12.1 This Statement sets out in Paragraphs 1 and 2 the nature of the Weston Marsh Substation A.
- 12.2 It summarises in Paragraph 3 the justification for the Weston Marsh Substation A and, in particular, at Paragraph 3.2 the public benefits that the Scheme will secure, and the involvement of national and local stakeholders in bringing this project forward. This establishes the compelling case in the public interest for the use of compulsory acquisition powers by National Grid.
- 12.3 In National Grid's view, this compelling case in the public interest justifies the proportionate interference with, and the overriding of, the private interests of those in the Order Land as considered in Paragraph 11 given that National Grid are seeking a proportionate approach to compulsory acquisition as described below.
- 12.4 As detailed in Paragraph 6, National Grid has engaged with parties affected by the Scheme and has been negotiating voluntary agreements.
- 12.5 Notwithstanding the good progress made to date, National Grid has planned a compulsory acquisition timetable as a contingency measure to provide certainty that all necessary land rights can be acquired within a reasonable timescale to enable the Scheme to proceed, and also to address any unknown land rights and interests.
- 12.6 National Grid has explained in Paragraph 9.2 the funding basis for the Scheme, addressing how sufficient funds will be available to both acquire all necessary land and rights, and also to enable the Scheme to proceed for the wider public benefit of the area.
- 12.7 In Paragraphs 7 and 8 it has been explained why there are no planning or other impediments to the Scheme proceeding.
- 12.8 Whilst a number of other consents and certificates are required, these are either subject to outstanding applications which will be concluded shortly or will be determined through the appeals process. It is anticipated that any public inquiries (in particular pursuant to the Section 37 Applications and the Order) may be able to be conjoined since the justification of the Order relies on the deliverability of the Scheme pursuant to the applications. It is anticipated that even were public inquiry/ies to be held, consents can be obtained to enable the connection of ODOW to the electricity transmission network within the required timescale. Some of the consents are of the type which it is usual for contractors to obtain from the relevant local authority at a later stage in the construction programme.
- 12.9 Accordingly, and given that National Grid is in active negotiations with all relevant parties including statutory undertakers, National Grid does not anticipate any impediments to the Scheme proceeding.

- 12.10 In light of all of the above considerations and in accordance with the statutory and all applicable policy tests, National Grid has made the Order and will submit the Order to the Secretary of State for confirmation.

Dated: 10 September 2026

DLA Piper UK LLP, Solicitors for National Grid Electricity Transmission PLC

LIST OF DOCUMENTS:

In the event of a public inquiry being held in respect of the Order, National Grid would intend to refer to or put in evidence the following documents:

1. The National Grid Electricity Transmission Plc (Weston Marsh Substation A) Compulsory Purchase Order 2026.
2. Plan showing the proposed Weston Marsh Substation A
3. Plan showing the proposed changes to 2WS.
4. Plan showing the proposed changes to 4ZM.
5. RIIO-T3 Business Plan, December 2024
6. National Grid's Licence Conditions
7. National Grid's Guidance on Land Rights for New Electricity Transmission Assets (England and Wales)
8. Corridor Preliminary Routeing and Siting Study for the Grimsby to Walpole DCO
9. Weston Marsh Siting Study Report
10. Such other documents as National Grid considers necessary to respond to any objections.

Copies of these documents have been made available on the Weston Marsh Substation A website nationalgrid.com/g-w/cpo.