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Joe O'Sullivan
South Holland District Council
Priory Road
Spalding
Lincolnshire

Ref: PE11 2XE

By email only to: Joe.O'Sullivan@e-lindsey.gov.uk

August 2026

Dear Joe,

H22-0466-26

Weston Marsh Substation A Town and Country Planning Act (TCPA) Application 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 in the vicinity of the Spalding Tee Point, Surfleet Seas End and Moulton Seas End (Planning Ref: H22-0466-26) ('the Application').

I am writing on behalf of behalf of National Grid Electricity Transmission (NGET) in relation to the above application. This letter accompanies a response to the objections raised in the Environment Agency's consultation response dated 16 June/12 August and updated versions of technical documents submitted the South Holland District Council (SHDC) on 28th June.

This submission has been prepared to provide further clarification and supporting information to assist SHDC and the Environment Agency (EA) in their assessment of the application. The enclosed information should be read alongside the documents submitted with the Application validated by SHDC on 18th May 2026.

For ease of reference the **Table 1** below sets out which documents form part of this additional submission in response to corrections or stakeholder feedback.

Table 1 Document Updates

Document Name	Drawing / Report Number	Description
Arboricultural Impact Assessment	GWNC-WSP-SS50-XXXXXX-RPT-ES-000005	Minor corrections picked up on the Tree Constraints and Impacts Plan and changes made through the report to reflect these corrections.
Otter and Water Vole Survey Report	GWNC-ARU-SS50-XXXXXX-RPT-ES-000012	Minor corrections to text.

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Document Name	Drawing / Report Number	Description
National Grid response to Environment Agency objection concerning flood risk from IDB watercourses and infrastructure [NEW]	GWNC-WSP-ZZZZ-ZZZZZZ-RPT-ES-000001	Technical note prepared in response to the Environment Agency's objection regarding the failure scenario of Lord's sluice/pumping station. This technical note provides supplementary evidence of the resilience of the Substation Works in this scenario and has been informed by associated engagement with the Environment Agency.
Illustrative Construction Compound Drawing [UPDATED]	GWNC-LST-OH70-ZZZZZZ-DRW-EN-000032_B	Drawing updated to reflect the use of a temporary cesspit rather than a septic tank during construction. This will not include any outfalls to any watercourses and foul water will be transported offsite for disposal.
Outline Construction Environmental Management Plan [UPDATED]	GWNC-ARU-SS50-XXXXXX-RPT-ES-000019	The Outline CEMP has been updated in response to a number of matters raised by the Environment Agency including foul drainage, water quality monitoring, the storage of fuels, oils and chemicals during construction and use of drip trays on stationary vehicles.
Outline Surface Water Drainage Strategy [UPDATED]	GWNC-WSP-SS50-XXXXXX-RPT-ES-000001	The Outline Surface Water Drainage Strategy has been updated in response to matters raised by the Environment Agency regarding the bunding of facilities during operation to reduce the risk of pollution.
Typical Cesspool Details [NEW]	GWNC-WSP-ZZZZ-ZZZZZZ-DRW-EN-000001	New drawing prepared to give details of a typical cesspool design which is proposed to be utilised during the operation of the Scheme, as stated in the Foul Drainage Strategy [GWNC-LST-ZZZZ-ZZZZZZ-TEC-EN-000004] submitted with the Planning Application.

The Applicant notes the further response provided by the Environment Agency as part of SHDC's reconsultation process.

Appendix A steps through the outstanding matters to agree with the Environment Agency as part of this submission. **Appendix A** seeks to address all outstanding matters with the Environment Agency, a further meeting with the Environment Agency was held on 12 August 2026 to discuss and agree the approach to the outstanding matters detailed below.

Yours sincerely,



Matthew Banks

Senior Planning and Consents Manager

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Appendix A

Table 2 Applicant's Responses to Further Environment Agency Comments

Environment Agency's Comments	Applicant's Response	Documents Prepared
We are upholding our objection to this development as the applicant has not assessed the risk a failure of the Lord's sluice/pump may pose to the site. Additionally, the applicant has not shown that the site will be resilient if this failure were to occur. *Overcoming our objection* *The applicant needs to undertake an assessment of the impact a sluice/pump failure may have to the development; this may best be done through hydraulic modelling. The applicant also needs to show evidence appropriate mitigation and resilience measures are included within the design of the development.*	The Applicant has now prepared a technical note to address the Environment Agency's concerns regarding flood risk to the proposed Weston Marsh Substation A from both failure/non-operation of the Lords Drain sluice and pumping station, and from channel capacity exceedance of IDB maintained watercourses in the Lords Drain catchment. This technical note has been developed following further engagement with both the IDB and the Environment Agency and analysis of available information provided by the IDB.	National Grid response to Environment Agency objection concerning flood risk from IDB watercourses and infrastructure [NEW] [GWNC-WSP-ZZZZ-ZZZZZZ-RPT-ES-000001]
We welcome the Applicant's comments to the fisheries consultee comments regarding protective measures for European eel and consultation on diversion of watercourses. *We support the design principles to protect European eel for any proposed outfalls. We also welcome the opportunity to be consulted on the detailed design of watercourse diversions to ensure a positive design of the wildlife.* *It is noted that specific supporting documents are referenced within the Applicant's response, however on review we are unable to identify where the details*	The Outline Construction Environmental Management Plan has been updated with new mitigation measure B15 which outlines the principles of the temporary outfall design as set out previously during engagement with the Environment Agency. Regarding operational outfall design, the same principles would be adhered to. It is proposed these details are addressed through conditions relating to approval of the final detailed drainage design and the Environment Agency would be consulted throughout this process and on the proposed drainage diversion.	Outline Construction Environmental Management Plan [UPDATED] [GWNC-ARU-SS50-XXXXXX-RPT-ES-000019]

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in the response have been updated in the supporting planning documentation. We suggest that the commitments alluded to in the response and details are added to the outline construction environmental management plan (oCEMP) (Ref GWNC-ARU-SS50-XXXXXX-RPT-ES-000019). *We therefore maintain our objection on these matters until relevant documents are updated and submitted as part of the planning application.*		
Having reviewed the Surface Water Drainage Strategy and Outline Construction Environmental Management Plan with the footer "July 2026", We cannot see any changes to any of the relevant sections. Therefore, the documents have not been updated. *We have reviewed their 'NGET Responses to EA feedback' document, and we are satisfied with their approach in theory, however until this extra information in captured in their "new" documents i.e. CEMP, we maintain our objection on the following grounds.* • *Use of a cesspit for foul water during construction and operation has been explained as adequately sized and they will empty via a licensed contractor.* • *There will be no oil-filled transformers at the substation which alleviates that risk.* • *Diesel generator will be self-bunded.*	In response to the Environment Agency's comments, the Applicant has revised the Outline Construction Environmental Management Plan, the Surface Water Drainage Strategy and the Illustrative Construction Compound drawing. A new drawing -Typical Cesspool Details - has also been prepared to supplement the Foul Drainage Strategy [GWNC-LST-ZZZZ-ZZZZZZ-TEC-EN-000004] submitted with the application. During construction, it is proposed a temporary cesspit of approximately 13600 litres would be utilised. The Illustrative Construction Compound drawing and mitigation measure W13 within the Outline CEMP has been updated to reflect this. The outfall previously illustrated has also been removed as no outfalls to watercourses will be implemented and all foul water will be transported offsite via tanker. During operation, it is proposed to use a 9000 litre cesspit as set out in the Foul Drainage Strategy [GWNC-LST-ZZZZ-ZZZZZZ-TEC-EN-000004]. A Typical Cesspool Details drawing has been prepared to give an indication of what this solution would look like	Illustrative Construction Compound Drawing [UPDATED] [GWNC-LST-OH70-ZZZZZZ-DRW-EN-000032_B] Outline Construction Environmental Management Plan [UPDATED] [GWNC-ARU-SS50-XXXXXX-RPT-ES-000019] Outline Surface Water Drainage Strategy [UPDATED] [GWNC-WSP-SS50-XXXXXX-RPT-ES-000001] Typical Cesspool Details [NEW] [GWNC-WSP-ZZZZ-ZZZZZZ-DRW-EN-000001]

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• *Bunded facilities (for oils and hydrocarbons) will have hydrocarbon sensors which can automatically shut off discharges and automatic penstocks, with manual backup, are proposed to manage surface water flows.* • *Control measures for concrete and storage areas seems appropriate.*	during operation, subject to detailed design and proposed to be addressed via planning condition. No outfalls to watercourses will be implemented and all foul water will be transported offsite via tanker, given connections to the sewer network are not considered viable. The Surface Water Drainage Strategy has been updated to reflect the Environment Agency's comments on bunded facilities.	
In the previous response, the Environment Agency were concerned about the missing survey data on watercourses and requested that the following condition be placed on the application - 'No development shall take place until the remaining watercourses have been surveyed for riparian mammals, and the addendum report has been submitted to, and has been reviewed by the LPA.'. *We are pleased that the applicant has conducted further otter and water vole surveys following the prior consultation, but we note these documents will not be submitted to the LPA until the end of August 2026. The Environment Agency would like to review the updated Otter and Water Vole Survey Report (GWNC-ARU-SS50-XXXXXX-RPT-ES-000012), and the updated Ecological impact Assessment Report (GWNC-ARU-SS50-XXXXXX-RPT-ES-000005) when these documents are submitted.* *Upon a review of the documents, we will determine whether to remove the recommended condition regarding otters and water voles.*	In addition to supplementary survey reports previously issued to SHDC, an updated Otter and Water Vole Survey Report forms part of this submission.	Otter and Water Vole Survey Report [UPDATED] [GWNC-ARU-SS50-XXXXXX-RPT-ES-000012]

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Materials and chemicals likely to cause pollution should be stored in appropriate containers and adhere to guidance for the storage of drums and intermediate bulk containers. Any facilities, above ground, for the storage of oils, fuels or chemicals shall be sited on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound should be at least equivalent to the capacity of the tank plus 10%. All filling points, vents, gauges and sight glasses must be located within the bund. *We advise that polluting materials and chemicals are stored in an area with sealed drainage. Having reviewed GWNC-ARU-SS50-XXXXXX-RPT-ES-000019 Outline Construction Environmental Management Plan (OCEMP), we have some additional recommendations we strongly advise the applicant to include in their development plans to ensure water quality is adequately protected:* • *Whilst we welcome details stated in GG11 Vehicles will be correctly maintained, however we suggest when they are stationary that drip trays are installed.* • *We agree with the principles in GG13, however this should be only for flammable liquids such as diesel, suitable bunding and volume capacity should be all fuels, oils and chemicals.* • *We note that WM01 mentions preventing rainwater ingress in relation to site waste, but there is no inclusion of this for storage areas for fuel, oil and chemicals. The Applicant should*	The Outline Construction Environmental Management Plan and specifically mitigation measures GG11 and GG13 have been updated in response to the Environment Agency's comments. GG11 relates to the maintenance and operation of vehicles during construction, this measure has been amended to allow for the installation of drip trays on stationary vehicles. GG13 relates to the storage of fuels, oils and chemicals, this measure has been amended to give further detail on their appropriate storage during construction.	Outline Construction Environmental Management Plan [UPDATED] [GWNC-ARU-SS50-XXXXXX-RPT-ES-000019]

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ensure that they are designed to be covered / prevent rainwater accumulation, and that there is a mechanism to allow accumulated rainwater to be removed regularly. *Appropriate procedures, training and equipment must be provided for the site to adequately control and respond to any emergencies including the clean-up of spillages, to prevent environmental pollution from the site operations.*		
With regard to water quality monitoring, we recognise that there are already mitigation measures identified to minimise impacts on surface water quality during construction, and that they can be considered effective based on precedent. However, even where construction mitigation measures are considered robust, water quality monitoring remains important to verify that those measures are working as intended in practice. Construction sites are dynamic environments, and unforeseen factors such as extreme weather, equipment failure, human error, or unexpected ground conditions can reduce the effectiveness of mitigation measures and lead to pollutant release. Water quality monitoring can enable the early detection of adverse effects before significant environmental harm occurs. *In addition, we understand that temporary drainage discharges would be subject to EA consent however by already implementing a water quality monitoring plan, separate to water quality related permit conditions, it can increase confidence among*	The Applicant has updated Sections 4.4 and 4.5 of the Outline Construction Environmental Management Plan in response to the Environment Agency's comments. New mitigation measure W15 has been added for completeness, which states visual inspections for the purposes of water quality monitoring would be undertaken in accordance with the procedure outlined in Section 4.4.	Outline Construction Environmental Management Plan [UPDATED] [GWNC-ARU-SS50-XXXXXX-RPT-ES-000019]

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Environment Agency's Comments	Applicant's Response	Documents Prepared
regulators, stakeholders and the public that risks to the water environment are being appropriately managed throughout the construction period. *Therefore, whilst we can agree that a full water quality monitoring plan may not be proportionate due to the scale, we request that there is a commitment for visual inspection daily at certain locations identified for water quality monitoring purposes. In the event of an incident or visible signs of contamination, this could then trigger in-situ measurements with hand-held devices and water samples to be taken and sent off to a UKAS accredited laboratory for further testing of contaminants. Details of this sampling and testing can be confirmed in the CEMP at detailed design.* • *Section 4.4 of the CEMP already commits to inspections to be carried out on the site throughout the construction phase by the the ECoW and we recommend that this is the most appropriate section of the CEMP for water quality monitoring to be clearly specified in.* • *Providing this recommendation is taken forward, we would also advise section 4.5 of the CEMP, in relation to site inspection reports, to be updated with "Visual observations/notes, and where applicable any in-situ data and laboratory analytical data, should be stored in a MS Excel results database to be overseen by the Main Works Contractor(s) supported by the ECoW.*		