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Joe O'Sullivan
Nationally Significant Infrastructure Projects Manager
South Holland District Council
Priory Road
Spalding
Lincolnshire
PE11 2XE

[redacted]

27 July 2026

Dear Mr O'Sullivan,

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.

On behalf of National Grid Electricity Transmission's (NGET), and the above application for the new Weston Marsh Substation A and associated works, herein referred to as "the Substation Works" on land in the vicinity of the Spalding Tee Point, Surfleet Seas End and Moulton Seas End, we provide responses to matters raised in consultation comments from various consultees.

Accordingly, please find a Table attached as **Appendix A** to this letter which confirms responses to matters raised by consultees and provides details of any updated or additional documents submitted to seek to provide clarification or address concerns, as appropriate.

In addition, as referred to in the Correction Notice submitted to the Council on 17 June 2026, please find enclosed updated versions of the documents identified in Table 1 below, as requested.

A detailed description of the Substation Works is provided in Section 5 of the Planning Design and Access Statement (GWNC-ARU-SS50-XXXXXX-RPT-CP-000002). The detail of the type of works and submitted plans are unchanged.

However, it has been identified that there are two figures describing the areas affected by the permanent footprint of the new Weston Marsh Substation A which are incorrect as referred to in the Planning Design and Access Statement and some other environmental documents.

The correct areas that should be used are as follows:

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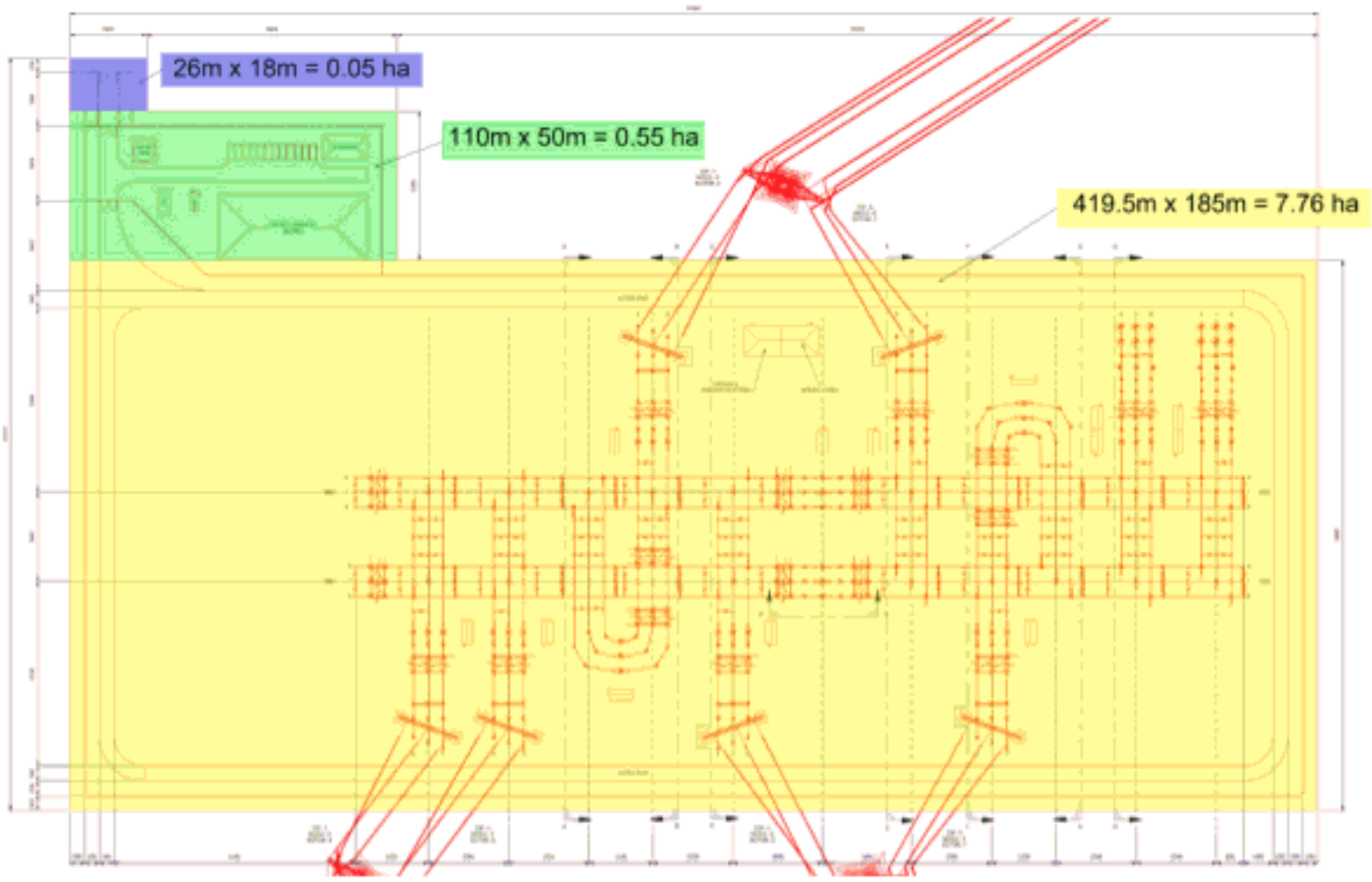
- The total footprint of the permanent electrical infrastructure comprising new Weston Marsh Substation A would be approximately 8.4 ha including a 5 m buffer around the fence line. The new Weston Marsh Substation A area includes three areas within the substation security fence:

    1) a small air lock area (area coloured purple in the image below) at the eastern end of the new permanent access route to the substation from Marsh Road which provides a fenced area between two gates to provide secure access. (Together, the air lock area and the 5m buffer around the fenceline covers approximately 0.05 ha);

    2) an outer compound area (area coloured green in the image below) of approximately 110 m by 50 m (approximately 0.6 ha) to accommodate ancillary buildings and equipment and car parking; and,

    3) a high voltage compound area (area coloured in yellow) of approximately 419.5 m by 185 m, (approximately 7.8 ha) providing the specialist electricity equipment

Image of Weston Marsh Substation A: Clarification of Areas



We confirm that the updated description of the substation development areas described above does not change the findings of any of these documents

Table 1, below, identifies which document is affected by this correction, and where the relevant correction has been made. It also identifies any other documents that have been updated or new documents that are being provided to address responses received. The final column of **Table 1** identifies where additional information has been included in updated versions of documents to signpost consultees to the changes. The changes arising from consultee comments are set out in more detail in **Appendix A**:

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To assist consultees, we have included a Tracked and a Clean version of each updated document submitted with this response.

Table 1 Updated Versions of Submitted Application Documents including corrections and new additional information/documents submitted with this response.

Document Name	Drawing / Report Number	Section/Paragraph of Document where correction applies (as described above)	Description of Updates
Planning Design and Access Statement	GWNC-ARU-SS50-XXXXXX-RPT-CP-000002	Section 1, paragraph 1.1.2 Section 1, paragraph 1.1.5 Section 1, paragraphs 1.2.4 – 1.2.9 Section 1, Image 1.1 Section 1, paragraph 1.5.1 Section 3, paragraph 3.1.6 Section 5, paragraph 5.1.3 Section 5, paragraph 5.5.12 Section 5, paragraph 5.5.20 Section 7, paragraph 7.2.13 Section 7, paragraph 7.4.10 Section 7, paragraph 7.4.11 Section 7, paragraph 7.14.7	Updates to include additional information on Outer Dowsing Offshore Wind (ODOW) Development Consent Order (DCO) consent including in principle consent for associated grid connection infrastructure at in the vicinity of the Spalding Tee Point at Weston Marsh. Updates as described in Correction Notice to correct error in substation site areas,
Statement of Community Involvement	GWNC-CAV-ZZZZ-ZZZZZZ-RPT-PM-000001	Section 2, paragraph 2.1.14	Updates as described in Correction Notice to correct error in substation site areas
Flood Risk Assessment	GWNC-WSP-SS50-XXXXXX-RPT-ES-000002	Section 2, paragraph 2.1.3 Section 3, paragraph 3.1.2	Updates as described in Correction Notice to correct error in substation site areas
Technical Note: Response to Environment Agency (EA) objection concerning flood risk from Internal Drainage Board (IDB) watercourses and infrastructure	GWNC-NGD-ENVS-ZZZZZZ-TEC-CP-000001	N/A - New document to be submitted in August 2026. (Not included within this response)	New document to be provided shortly, to respond to comments from consultees

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Document Name	Drawing / Report Number	Section/Paragraph of Document where correction applies (as described above)	Description of Updates
Flood Risk Assessment Appendix A Hydraulic Modelling Report	GWNC-WSP-SS50-XXXXXX-RPT-ES-000006	Section 1, paragraph 1.3.1	Updates as described in Correction Notice to correct error in substation site areas
Lighting Strategy (including Lighting Plan as Appendix A)	GWNC-WSP-ZZZZ-ZZZZZZ-STG-PM-000001	Section 1, paragraph 1.3.2	Updates as described in Correction Notice to correct error in substation site areas
Surface Water Drainage Strategy (including Indicative Surface Water Drainage Layout included as Appendix D)	GWNC-WSP-SS50-XXXXXX-RPT-ES-000001	Section 1, paragraph 1.4.2 Section 6, Table 6.1	Updates as described in Correction Notice to correct error in substation site areas
Proposed IDB Watercourse Diversion Weston Marsh A 400kv Substation Drawing	GWNC-WSO-SS530-ENABLE-DRW-HY-000001	N/A - New Drawing	New drawing for information only to indicate the position of the IDB watercourse diversion in the context of existing gas pipeline assets and proposed infrastructure
Biodiversity Net Gain Report	GWNC-ARU-SS50-XXXXXX-RPT-ES-000015	See description in final column	Formatting updates made throughout the document. An error in Paragraph 5.4.8 was updated in response to stakeholder feedback. Habitat units updated to reflect earlier change made (Paragraph 6.2.1, 6.2.8, 6.2.10, 8.1.3 and 8.1.4; Table 6.1, 6.4 and 6.7; Image 1). Paragraph 8.1.5 updated to provide further clarity on how the Biodiveristy Net Gain (BNG) condition will be discharged. Appendix C Statutory Biodiversity Metric updated to reflect changes made

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Habitats Regulations Assessment Stage 1 Screening Report	GWNC-ARU-SS50-XXXXXX-RPT-ES-000014	Section 6, paragraph 6.2.1	Formatting updates made throughout the document Reference to New Cut Drain included in error and has been amended throughout Section 3.3 added to present the methodology of the Appropriate Assessment Greylag goose added to Table 5.3 Further justification to scope out disturbance to otter from Appropriate Assessment added to Paragraph 6.3.13 and 6.5.7 in response to feedback from Natural England. Amendments to Section 6.4 to scope in the injury/mortality from overhead line collisions into Appropriate Assessment in response to feedback from Natural England. Paragraph 6.9.8 corrected following feedback from the Lincolnshire Wildlife Trust. Section 7 Appropriate Assessment added following feedback from Natural England on the injury/mortality from overhead line collisions impact pathway. Summary at Paragraph 8.1.3 updated to reflect changes made to the document.
Aquatic Survey Report	GWNC-ARU-SS50-XXXXXX-RPT-ES-000006	See description in final column	Formatting updates made throughout the document Paragraphs 3.5.4 and 3.5.5 removed from limitations section. Missing survey data added (Paragraphs 4.2.14 – 4.2.16) Summary section updated to reflect survey data added (Paragraph 5.2.7, 5.3.7, 5.4.8 and 5.5.7)

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Great Crested Newt Survey Report	GWNC-ARU-SS50-XXXXXX-RPT-ES-000011	See description in final column	Formatting updates made throughout the document Paragraph 3.3.4 updated to reflect surveys undertaken Tables 3.5, 3.6 and 3.7 updated to reflect additional survey data Tables 4.1 and 4.3 updated to reflect additional survey data Summary updated to reflect additional survey data (Paragraphs 5.1.1 – 5.1.3)
Otter and Water Vole Survey Report	GWNC-ARU-SS50-XXXXXX-RPT-ES-000012	N/A - Updated document to be submitted in August 2026. (Not included within this response)	Missing surveys have now been completed (where landowner access has been granted). An updated survey report reflecting these findings will be provided to South Holland District Council (SHDC) in August.
Bat Survey Report	GWNC-ARU-SS50-XXXXXX-RPT-ES-000008	N/A - Updated document to be submitted in August 2026. (Not included within this response)	Bat surveys are due to be completed in August 2026 and the Applicant intends to provide an updated copy of the Bat Survey Report to SHDC by the end of August 2026.
Ecological Impact Assessment	GWNC-ARU-SS50-XXXXXX-RPT-ES-000005	A further updated copy of the Ecological Impact Assessment (EcIA) will be provided to SHDC by the end of August 2026 once all surveys have completed.	Updates to Section 5, paragraph 5.3.8 of the EcIA as described in Correction Notice to correct error in substation site areas. Further updates of the EcIA will be provided once all surveys have completed.
Outline Construction Environmental Management Plan (CEMP)	GWNC-ARU-SS50-XXXXXX-RPT-ES-000019	Section 2, paragraph 2.1.2	Updates as described in Correction Notice to correct error in substation site areas
Landscape and Visual Assessment Figure 7 Zone of Theoretical Visibility	GWNC-GIL-SS50-XXXXXX-RPT-ES-000001	Figure 7	Update to respond to comments from consultees

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Appendix B provides a response to concerns raised by consultees (as detailed in Appendix A) that the Scheme should be included within the Grimsby to Walpole DCO, and that the use of separate consenting regimes represents an inappropriate division of infrastructure.

If you require any additional information or wish to discuss the scheme further, please do not hesitate to contact me.

Yours sincerely,



Matthew Banks

Senior Planning and Consents Manager

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Appendix A Applicant's Responses to Consultee Comments

Consultee's Comments	Topics Raised	Applicant's Response	Supporting Document Reference
Active Travel England			
"Following a high-level review of the above planning consultation, Active Travel England has determined that standing advice should be issued and would encourage the local planning authority to consider this as part of its assessment of the application. Our standing advice can be found here: *https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes"*	Active travel options as part of the development	The Applicant prepared the documents forming part of the application with regard to the standing advice from Active Travel England. Section 4 of the Transport Statement sets out baseline conditions for public transport and the walking, wheeling, cycling and Public Right of Way (PRoW) network in the Weston Marsh area. The Scheme Site Boundary is situated approximately 6 km from the closest bus stop and 8 km from the nearest railway station. Therefore, it was concluded the use of public transport for construction workers to access the site was unlikely. Figure 5 of the Transport Statement shows the PRoW network in the vicinity of the Scheme Site Boundary. An Outline Construction Traffic Management Plan (CTMP) was submitted in support of the application. This document sets out the strategy and measures for managing construction traffic to be adopted by the Main Works Contractor, including managing impacts to PRoW and cycle routes. Sustainable modes of travel are encouraged to reduce the impact of workforce travel on local residents and businesses and to reduce single occupancy car trips to site. A final CTMP will provide further details of Construction Worker travel planning and will be adopted prior to construction of the Scheme, which is anticipated to be subject to agreement with SHDC via associated planning condition(s).	GWNC-ARU-SS50-XXXXXX-RPT-ES-000018 GWNC-WSP-ZZZZ-ZZZZZZ-PLN-PM-000002
Anglian Water			
"It is highly recommended that the applicant carries out a thorough investigation of the proposed working area to establish whether any unmapped public or private sewers, lateral drains, or other water infrastructure assets are in existence."	Further Investigation for Privately Owned Assets	The Applicant undertook Geophysical and Ground Penetrating Radar (GPR) surveys during the pre-application stage of the Scheme to identify whether public or private sewers, lateral drains or other water infrastructure assets were located within the application site boundary which might be impacted by the Scheme. The Applicant has also contacted the landowners to request drawings of the existing lateral land drains. No unmapped public or private sewers, lateral drains or other water infrastructure assets were located as part of the above surveys. Further surveys will also be undertaken in advance of construction. As set out within the Outline CEMP, this includes pre-construction land condition surveys to inform any further remedial measures and site reinstatement. The final CEMP would be prepared by National Grid, which is anticipated to be subject to agreement with SHDC via associated planning condition(s).	GWNC-ARU-SS50-XXXXXX-RPT-ES-000019
"Due to the private sewer transfer in October 2011, many newly adopted public used water assets and their history are not indicated on our records. Any encroachment zones should be reflected in the site layout."		None of the records reviewed by National Grid indicate that the Proposed Development encroaches with privately owned assets and therefore these have not been reflected on the site layout.	N/A
"The development site may contain private water mains, drains or other assets not shown on our records. These are private assets and not the responsibility of Anglian Water but that of the landowner."		The Applicant accepts the development site may contain private assets not shown on Anglian Water Assets or records reviewed to date by National Grid. It is also acknowledged that private water mains, drains or other assets not shown on Anglian Water records are private assets and not the responsibility of Anglian Water, but that of the landowner The Applicant has contacted private landowners to request any further details and will continue to engage with directly affected parties to inform finalisation of the detailed design. To date, no information has been forthcoming from landowners to indicate that there are private water infrastructure assets within the Application site.	N/A
Boston Borough Council – Planning Policy Officer			
"This proposal is in the 'Countryside' as defined by Policy 1 of the SE Lincolnshire Local Plan. *As such proposals will be permitted that are "necessary to such a*	Relevant policies in South East Lincolnshire Local Plan (SELLP)	The Applicant acknowledges confirmation that SHDC does not have any large brownfield sites, and that the type of development proposed in the application would need to be accommodated within the countryside. The comments from the Planning Policy Officer give weight to the substation's proposed	GWNC-ARU-SS50-XXXXXX-RPT-CP-000002

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Consultee's Comments	Topics Raised	Applicant's Response	Supporting Document Reference
location and/or where it can be demonstrated that it meets the sustainable development needs of the area in terms of economic, community or environmental benefits". *This type of development must go in the countryside as plainly it can't fit into an urban location. South Holland does not have any large brownfield sites, such as former RAF stations, like those found in East Lindsey, and so agricultural land will be used."*		location.	
"The SELLP has several policies that the proposal should be considered against. *Policy 2, bullets 1, 4, 6, 7, 8.* *Policy 3, bullets 3, 11, 12, 14.* *Policy 4.* *Policy 28, bullet 3.* *Policy 29, bullets A, C.* *Policy 30, bullets 2, 3, 5, 6, 7.* *Policy 31, bullets A:2, 5"*		The Applicant confirms that all the policies in the SELLP identified have been considered in the design of the Substation Works and are considered in detail in the Planning Design and Access Statement which accompanies the application.	GWNC-ARU-SS50-XXXXXX-RPT-CP-000002
Councillor Eldridge – South Holland District Council			
"The proposal represents a substantial industrial infrastructure development within open Fenland countryside. The scale of the proposed substation infrastructure, including security fencing, engineered platforms, lighting, access arrangements, and associated operational development, would fundamentally alter the existing rural character of the area. The submitted Landscape and Visual Appraisal acknowledges that the development would be visible from surrounding receptors and identifies landscape effects arising from the proposal. Given the flat and open nature of the Fenland landscape, there is concern that the visual impact of the development would extend across a wide area. Although landscape mitigation planting is proposed, such planting would take many years to mature and may never fully screen infrastructure of this scale within the wider landscape context. In my view, the proposal conflicts with: South East Lincolnshire Local Plan Policies 2, 3 and 28; and National Planning Policy Framework provisions relating to landscape character, visual amenity, and protection of the countryside."	Landscape Character and Rural Setting	A Landscape and Visual Appraisal was submitted in support of the Planning Application. The impacts of the Scheme were considered in the context of a landscape which already has a number of existing overhead lines, with the preferred location of the substation being selected to reduce the spread of infrastructure across the landscape and minimise the extent of visual effects. Landscape and visual effects arising from the Scheme ranged from negligible to minor adverse, with the exception of a moderate adverse visual effect at Weston during year one of operation. This would reduce to minor adverse at year 15 due to the proposed landscape planting being fully established, reducing the effects on nearby properties. With regards to policy considerations, the Scheme has considered the relevant policies in the SELLP. Policy 2: Development Management considers sustainable attributes of a development. The Scheme has considered the relevant attributes including location and appearance, access, impacts of noise and visual intrusion, sustainable drainage and flood risk, the impact on habitats and heritage assets as set out in the relevant documents submitted, namely the following: Landscape and Visual Appraisal, Transport Statement, Noise and Vibration Assessment, Surface Water Drainage Strategy, Flood Risk Assessment (FRA), EcIA and Historic Environment Desk-based Assessment. Policy 3: Design of New Development. A number of the issues set out in Policy 3 are not considered to be relevant to the Proposed Development. Those that are have been a key consideration during the design stage of the project. Whilst the proposed Weston Marsh Substation A is located within an area of existing farmland, land take has been minimised as far as reasonably practicable and the proposed substation has been sited adjacent two existing electricity transmission corridors. The presence of these existing 400kV overhead lines (4ZM and 2WS) already influences the landscape character of the location and has been a key factor in determining the preferred location of the substation, to minimise encroachment of the required electricity transmission infrastructure within the wider landscape. Extensive planting is also included in the proposal to provide a screening function and support landscape integration of new elements of infrastructure. This includes retention of existing trees and hedgerows and new supplementary landscaping in these localities. Potential impacts upon residential amenity are considered within the technical documentation submitted in support of the application, including the Landscape and Visual Appraisal, Noise and Vibration Assessment, Air Quality Assessment and Transport Statement. No significant residual effects are identified. Flood resilience, robust security measures, sensitive lighting design and use of sustainable drainage system (SuDS) are all accounted for within the proposals and compliance with Policy 3 is evidenced by the supporting FRA, Lighting Strategy, Surface Water Drainage Strategy and design drawings.	GWNC-GIL-SS50-XXXXXX-RPT-ES-000001 GWNC-ARU-SS50-XXXXXX-RPT-ES-000019 GWNC-WSP-ZZZZ-ZZZZZZ-RPT-PM-000001 GWNC-ARU-SS50-XXXXXX-RPT-ES-000005

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Consultee's Comments	Topics Raised	Applicant's Response	Supporting Document Reference
		In line with Policy 28: The Natural Environment, the Scheme has considered the effects on international, national and locally designated sites, protected species and priority habitats as set out in the EcIA. Ecological mitigation has been incorporated into the design of the Scheme, as set out in the Indicative Landscape and Ecological Mitigation Proposals (LEMP) and the EcIA. As such it is considered the Scheme meets the objectives of the National Planning Practice Framework (NPPF) and relevant SELLP polices in terms of facilitating low carbon energy development whilst having regards the environment and people in the local area.	
"A major concern is the cumulative impact arising from the concentration of large-scale energy infrastructure projects within South Holland and the wider Lincolnshire area. *Although this application has been submitted separately to the Local Planning Authority, it forms part of a much wider network of strategic energy infrastructure proposals across the district and beyond. The development should therefore not be considered in isolation.* *Whilst every planning application must be considered on its own merits, this proposal does not fully acknowledge the wider infrastructure it is intended to facilitate or connect to. Without those related projects, this development would not be required. The submitted documentation therefore fails to present the true extent of the cumulative impacts likely to be experienced by local communities, the environment, the highway network, agricultural land, and the wider rural landscape.* *There is significant concern that the piecemeal submission of interconnected projects prevents a transparent and comprehensive assessment of the overall environmental, landscape, transport, agricultural, and community impacts arising from the wider scheme as a whole.* *Given the strategic nature and cumulative scale of the infrastructure involved, it would be more appropriate for the proposal to be considered through the Nationally Significant Infrastructure Project process rather than through fragmented local planning applications.* *Although each scheme may technically be assessed individually, the combined effect risks the gradual industrialisation of the countryside and the erosion of rural character. I am not satisfied that the cumulative impacts have been adequately assessed or addressed."*	Cumulative Infrastructure Projects	A Cumulative Effects Assessment Report was submitted in support of the Planning Application based upon pre-application engagement with SHDC. This assessment considered the Scheme in its entirety alongside a long list of other committed developments within a maximum radius of 20 km (depending on development category) of the Scheme. 19 other existing and/or approved developments were included in the Cumulative Effects Assessment short-list, informed by best practice assessment guidelines. The potential cumulative effects of the Scheme, when considered in combination with these 19 short-listed developments, was then assessed in further detail. Wider infrastructure intended to connect to the Weston Marsh Substation A was included in the short-list (ODOW and Meridian Solar Farm) along with other existing and/or approved National Grid Projects (Eastern Green Link (EGL)3 and EGL4, Weston Marsh to East Leicestershire (WMEL) and Grimsby to Walpole), in accordance with the Planning Inspectorate's Advice on Cumulative Effects Assessment[1]. Therefore, the Applicant considers the cumulative effects of the Scheme to have been assessed robustly and reported as part of the Planning Application. The Cumulative Effects Assessment Report concluded that the Scheme is not likely to result in significant cumulative effects above and beyond those already reported for the Scheme and the other existing and/or approved projects in isolation. As set out within the Planning Design and Access Statement, the Scheme in its totality is a standalone development to enable connection of ODOW to the national electricity transmission system. The Scheme would fully function as part of the national electricity transmission system and is not dependent on any additional infrastructure proposed as part of the Grimsby to Walpole Project DCO application (or any other National Grid projects). The Scheme is not a Nationally Significant Infrastructure Project (NSIP) and is therefore subject to consent via the TCPA process.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000020
"The site lies within a sensitive managed drainage environment characterised by extensive drains, ditches, and water management infrastructure, all of which are crucial to South Holland. *Although a Flood Risk Assessment and Surface Water Drainage Strategy have been submitted, the proposals appear heavily reliant on engineered mitigation measures and long-term maintenance arrangements. Given the increasing frequency of severe weather events and the importance of maintaining effective drainage systems within South Holland, I remain concerned regarding:* - *the long-term resilience of the drainage strategy;*	Flood Risk and Drainage	The preliminary drainage design presented within the Surface Water Drainage Strategy has taken account of future climate change allowances, including projected increases in rainfall intensity, to inform the proposed surface water management strategy for the anticipated operational lifetime of the development. Existing watercourses and the wider network of local water bodies have been investigated, and appropriate mitigation measures have been incorporated into the design, including the proposed watercourse diversion. The detailed drainage design and the design of the proposed diversion are currently being developed and will be submitted at the appropriate stages of the planning and consenting process, namely the IDB consenting stage and the discharge of planning conditions, respectively.	GWNC-WSP-SS50-XXXXXX-RPT-ES-000001 GWNC-ARU-SS50-XXXXXX-RPT-ES-000019 GWNC-WSP-SS50-XXXXXX-RPT-ES-000002

[1] Planning Inspectorate (2024) Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment. GOV.UK. Available at: https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-oncumulative-effects-assessment [Accessed 27 July 2026].

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Consultee's Comments	Topics Raised	Applicant's Response	Supporting Document Reference
- *potential impacts on surrounding drainage networks;* - *surface water management during extreme rainfall events; and* - *construction impacts on existing watercourses.* *I am not fully satisfied that the submitted information conclusively demonstrates that flood risk elsewhere would not increase as a result of the development.* *This concern is reinforced by Anglian Water's consultation response which states that it "highly recommended that the applicant carries out a thorough investigation of the proposed working area to establish whether any unmapped public or private sewers, lateral drains or other water infrastructure assets are in existence." Their response also notes that the site "may contain private water mains, drains or other assets not shown on our records."*		In relation to potential impacts on the surrounding drainage network, runoff generated by the Scheme will be attenuated and discharged at restricted rates. The Surface Water Drainage Strategy has been developed to maintain the existing catchment hydrology and drainage regime, ensuring that the hydrological balance of the area is appropriately managed. The Applicant undertook Geophysical and GPR surveys during the pre-application stage of the Scheme to identify whether public or private sewers, lateral drains or other water infrastructure assets were located within the application site boundary which might be impacted by the Proposed Development and result in increased flood risk. The Applicant acknowledges that the development site may contain private assets not shown on GPR and Anglian Water Asset plans. The Applicant has also contacted the landowners to request drawings of the existing lateral land drains. Further pre-construction surveys will be completed as set out within the Outline CEMP, including control measure GG05. This control measure provides a commitment to undertaking surveys including a pre-condition survey of the working areas to identify existing land drainage features, including field drains, and to inform appropriate construction methods to avoid or minimise disruption where practicable. Where temporary works or land take would affect existing field drainage infrastructure, the drainage would be protected, diverted, repaired or reinstated, as appropriate, to maintain the existing drainage function and reinstate the land to its pre-construction condition. During the operational lifetime of the development, rainfall on the Proposed Development will be captured within the proposed surface water drainage network features and discharged to the surrounding watercourse network at the proposed outfalls. The Proposed Development layout maintains an appropriate easement from the surrounding watercourses. Where required, including to accommodate drainage outfalls, the necessary consents will be obtained. The Outline CEMP includes the measures to reduce construction impacts on the existing watercourses. The FRA assessed flood risk from all sources, including existing drainage infrastructure, sewers and water infrastructure where information was available, and proposed adequate measures to mitigate the risk. The FRA assessed risk to the permanent elements of the development, in the operational phase. It will be the responsibility of the contractors to ensure that relevant surveys are undertaken before commencing any intrusive works, including further existing utility searches.	
"The proposal would result in the loss of Grade 1 Best and Most Versatile (BMV) agricultural land for major infrastructure development. *South Holland plays an important role in agricultural production and national food supply. The continued incremental loss of productive agricultural land to large-scale infrastructure projects is therefore a matter of legitimate concern.* *Whilst national infrastructure improvements may be necessary, I do not believe sufficient justification has been provided to demonstrate why this scale of development could not be directed towards less sensitive locations or designed in a way that would reduce impacts on agricultural land and the wider rural landscape."*	Agricultural Land	It is acknowledged the Scheme will result in the permanent loss of 19.69 ha of Grade 1 best and most versatile agricultural land. This loss represents 0.03% of land classified as Provisional Grade 1 land in Lincolnshire. This calculation is based on the 75,757 ha of Provisional Grade 1 land in Lincolnshire as defined by Ministry of Agriculture, Fisheries and Food (MAFF) (1983)[2]. All soils permanently disturbed would be reused on site where practicable, with all soil handling undertaken in line with published good practice as set out in the Outline Soil Management Plan. As identified in the updated Planning, Design and Access Statement (PDAS) (GWNC-ARU-SS50-XXXXXX-RPT-CP-000002) particularly paragraphs 1.2.6-1.2.9, the principle for grid connection infrastructure to be provided in the vicinity of the Spalding Tee Point has already been considered and accepted in the ODOW DCO examination and the decision. Previously published studies by National Grid provide significant justification supporting the preferred location for the Weston Marsh Substation A, including those 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 (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	GWNC-ARU-SS50-XXXXXX-RPT-CP-000002

[2] Agricultural Land Classification of England and Wales – The Distribution of the Grades; MAFF (1983) Technical note TN/RP/01 TFS 846

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		these options against environmental, social and economic factors, with an emerging preference reported. 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.	
"The submitted ecological reports identify a landscape containing drains, ditches, agricultural margins, and associated habitats that support a range of species and ecological networks. *Although mitigation measures are proposed, I remain concerned about:* - *habitat fragmentation;* - *construction disturbance;* - *lighting impacts;* - *the long-term effectiveness and management of mitigation measures; and* - *the cumulative ecological impacts of multiple infrastructure developments across the wider area.* *I do not consider that the submitted information demonstrates that ecological impacts can be fully avoided or satisfactorily mitigated over the long term."*	Ecology and Biodiversity	Given the extensive ecological information submitted in support of the Planning Application, it has been demonstrated that impacts upon ecological receptors will be mitigated over the long term and significant effects can be avoided. <u>Habitat fragmentation</u> The Applicant will seek to minimise habitat loss in the first instance where practicable, however some temporary and permanent losses are unavoidable. Land used temporarily will be reinstated where practicable to its pre-construction condition (including Agricultural Land Classification (ALC) grade) and use. Hedgerows, fences and walls (including associated earthworks and boundary features) will be reinstated to a similar style and quality to those that were removed, in consultation with the landowner. These measures will be secured within a CEMP and will avoid significant long-term effects on habitat connectivity. New landscape planting is also proposed which will provide long-term biodiversity benefit. This is illustrated on the Indicative LEMP. <u>Construction disturbance</u> Mitigation is proposed where works have the potential to disturb protected species. The contractor(s) will comply with relevant protected species legislation. Appropriate licences will be obtained where necessary from Natural England for all works affecting protected species as identified by the EcIA and through pre-construction surveys. All applicable works will be undertaken in accordance with the relevant requirements and conditions set out in those licences. An Outline CEMP was submitted in support of the Planning Application, which aims to ensure that any potential adverse effects upon the environment during construction would be minimised as far as reasonably practicable. It is intended for the CEMP to be a 'live document' and will be updated as and when there are changes to the project team or where additional information becomes available. The Outline CEMP provides the basis of a final CEMP, which would be prepared and agreed with the relevant consenting authorities in advance of the start of construction. It contains best practice measures including but not limited to limiting any potential adverse effects caused by construction noise and lighting. In the event that vegetation or any other feature with the potential to support breeding birds is required to be removed during the main breeding bird season (01 March to 31 August) or, in the case of Schedule 1 birds (e.g. barn owl), is likely to be disturbed, then works will be undertaken in the presence or supervised by an Environmental Clerk of Works (ENvCoWs). Appropriate protection measures will be put in place should active nests be found. Where any in channel watercourse works are required, works will be completed between 16 June and September 30 to avoid key fish spawning and migration periods (species specific, depending on waterbody). In addition, where feasible, depending on ground conditions, piling activities will utilise soft-start non-percussive piling techniques to limit disturbance of fish. <u>Lighting impacts</u> Outline CEMP measures LV05 – LV07 would manage the risk of impacts due to temporary lighting during construction of the Scheme. A Lighting Strategy was also prepared for the Planning Application, this is to ensure the operational lighting of the new Weston Marsh Substation A complies with relevant UK legislation as well as environmental and construction best practice.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000005 GWNC-ARU-SS50-XXXXXX-RPT-ES-000015 GWNC-ARU-SS50-XXXXXX-RPT-ES-000019 GWNC-WSP-ZZZZ-ZZZZZZ-STG-PM-000001 GWNC-ARU-SS50-XXXXXX-RPT-CP-000002

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		Lighting during construction and operation has subsequently been considered as an impact pathway for each protected species in turn in the EcIA. With the implementation of best practice measures detailed above, it is predicted residual effects would be not significant. Paragraph 5.3.10 of the updated PDAS (GWNC-ARU-SS50-XXXXXX-RPT-CP-000002) states that: *"All lighting would be designed in accordance with the appropriate design standards and National Grid technical specifications. The security lighting would be event activated (i.e. would not be continuous) and would be designed to be environmentally sensitive (e.g. directional and low light not exceeding 50 lux). Further information regarding the substation lighting design has been provided in a **Lighting Strategy** (GWNC-WSP-ZZZZ-ZZZZZZ-RPT-PM-000001) and **Lighting Plan** (GWNC-WSP-ZZZZ-ZZZZZZ-STG-PM-000001)."* Long term effectiveness and management of mitigation measures A five-year aftercare period will be established for all reinstatement and mitigation planting (as illustrated on the Indicative LEMP). The details of this aftercare will be set out in the LEMP, which is anticipated to be subject to agreement with SHDC via associated planning condition(s). Where protected species mitigation licences are required, monitoring will be completed in accordance with the licence conditions. With respect to BNG measures, as set out within the Biodiversity Net Gain Report (BNG Report), it is anticipated that a detailed Habitat Monitoring and Maintenance Plan (HMMP) will be subject to appropriate planning condition(s). To align with the standard BNG requirements, the draft HMMP included within the BNG Report is set over a minimum period of 30 years. Cumulative impact of multiple infrastructure developments Please see the response above on the cumulative effects assessment prepared for the Planning Application.	
"The proposal would generate substantial construction activity over an extended period, including heavy goods vehicle movements, engineering works, construction compounds, and associated disruption. *The surrounding road network is predominantly rural in character and, in many areas, already in poor condition. There is therefore concern regarding:* - *highway safety;* - *increased heavy vehicle traffic;* - *impacts on local residents and businesses;* - *disruption to agricultural operations; and* - *noise, vibration, dust, and lighting during construction.* *Although mitigation measures are referenced within the submitted documentation, I do not believe the likely cumulative impacts on local amenity and rural road infrastructure have been fully resolved."*	Construction Traffic and Residential Amenity	A Transport Statement, Outline CTMP, Noise and Vibration Assessment, Air Quality Assessment, Cumulative Effects Assessment and Outline CEMP were submitted in support of the Planning Application, demonstrating that associated potential impacts have been considered in detail and appropriate management measures identified. Highway safety and increased heavy vehicle traffic The Transport Statement assesses construction traffic resulting from the Scheme. Percentage impacts on the main road network due to construction traffic from the Scheme are forecast to be low. Percentage differences on Marsh Road and Stone Gate are much higher, but the overall number of construction traffic vehicles are modest and impact on these roads will be temporary. It is not considered that this will result in severe impact on operation of the local highway network. Road widening is proposed on Stone Gate to make it suitable for Heavy Goods Vehicle (HGV) traffic, and a haul road is proposed midway up Stone Gate which then takes any HGV traffic associated with the Scheme off the rest of Stone Gate and Marsh Road. Marsh Road and the section of Stone Gate north of the haul road would only be utilised by construction worker cars/vans. Temporary suspension and diversion of PRoW Ref Wstn/7/1 is required to maintain safe movement of pedestrians during construction. Details of this will be agreed with the local highway authority and measures in place to advise users of the PRoW. The Outline CTMP set out the strategy and measures for managing construction traffic to be adopted by the Main Works Contractor. Sustainable modes of travel are encouraged where reasonable to reduce the impact of workforce travel on local residents and business and to reduce single occupancy car trips to site. A final CTMP will be adopted prior to construction of the Scheme, it is anticipated this would be pursuant to a planning condition and agreed with the local highway authority. Impacts on local residents and businesses (including noise, vibration, dust and lighting) The proposed Weston Marsh Substation A is located in a rural location and as such, the number of local residents and businesses in close proximity to the Scheme Site Boundary is relatively low. Notwithstanding this, impacts upon neighbouring receptors within the Zone of Influence of the Scheme have been assessed in detail within the respective technical assessments submitted in support of the Planning Application.	GWNC-ARU-SS50-XXXXX-RPT-ES-000018 GWNC-WSP-ZZZZ-ZZZZZZ-PLN-PM-000002 GWNC-ATG-SS50-XXXXXX-RPT-ES-000001 GWNC-WSP-SS50-XXXXXX-RPT-ES-000004 GWNC-ARU-SS50-XXXXXX-RPT-ES-000020 GWNC-ARU-SS50-XXXXXX-RPT-ES-000019

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		The assessment of construction traffic was screened out of both the Noise and Vibration and Air Quality assessments as projected construction traffic flows are low and do not meet the thresholds for further detailed assessment as set out in the relevant best practice assessment guidance. It is therefore considered any noise and air quality impacts from construction traffic would be adequately controlled by the CTMP and the CEMP. Similarly, assessment of noise and vibration and construction dust impacts due to on-site works has concluded that significant effects would be avoided through the application of well-established management measures, which are specified within the Outline CEMP. These conclusions are based upon the relevant best practice assessment guidance. Potential in-combination effects (intra-project effects) upon the amenity of residents and businesses have been considered within the Cumulative Effects Assessment Report. No significant effects upon amenity as a result of the are likely, based upon the robust management measures that are set out in the Outline CEMP and Outline CTMP and given the distance from the main construction works and residential and business properties. Disruption to agricultural operations It is acknowledged that construction of the Scheme would result in disruption of agricultural operations. National Grid are in active discussions with affected landowners and are engaging on measures to minimise disruption as far as reasonably practicable. A statutory compensation framework exists to ensure that those affected are appropriately compensated for losses attributable to the Scheme. This includes compensation to the acquisition of rights and land, temporary use of land, disturbance losses (including agricultural and business losses where applicable), severance and injurious affection to retained land. Where the statutory tests are met, blight could be claimed and owners of property outside the application boundary may be entitled to pursue Part I claim under the of the Land Compensation Act 1973 where compensation is provided where the value of a qualifying property is reduced by the use of the public work, or a Section 10 claim under the Compulsory Purchase Act 1965 which provides compensation for injurious affection where no land has been taken, arising from the execution (construction) of the works and interference with legal rights, subject to the relevant statutory tests. Where appropriate the Applicant will also seek to mitigate impact through measures such as accommodation works (including works that the applicant would carry out to mitigate any effects upon landowners, such as providing alternative field access), land swaps and negotiated agreements, with the objective of reducing the effects on local businesses (including agriculture), maintain land viability and minimising disruption. Collectively, these measures ensure that affected landowners have access to both statutory compensation and reasonable mitigation. Landowners have been consulted with from the commencement of the project and discussions around their preferred mitigation measures continue through the voluntary engagement process.	
"The submitted Phase 1 Geoenvironmental Desk Study is preliminary in nature and acknowledges limitations associated with desk-based assessment methodologies. *The report indicates that further intrusive investigation work may be required to fully assess contamination risks, groundwater conditions, and ground stability matters.* *Given the sensitivity of the surrounding drainage environment and agricultural setting, I consider it premature to determine the application before comprehensive intrusive investigations, together with any necessary mitigation measures, have been completed and independently assessed."*	Geoenvironmental and Ground Conditions	Land contamination guidance in England and Wales, primarily the EA's Land Contamination Risk Management (LCRM), specifies a tiered approach to risk assessment comprising (only as necessary): • Tier 1 – Preliminary Risk Assessment (PRA) • Tier 2 – Generic Quantitative Risk Assessment (GQRA) • Tier 3 – Detailed Quantitative Risk Assessment (DQRA) The Desk Study report submitted with the application is a Tier 1 PRA. As such, the term 'preliminary' refers to the Tier of the assessment rather than the status of the report. The PRA has been prepared in accordance with LCRM guidance, presenting a conceptual site model (CSM) that sets out the potential contaminant linkages associated with the site and evaluating the risk associated with each. In accordance with Government guidance 'Land Affected by Contamination' (available at: https://www.gov.uk/guidance/land-affected-by-contamination), applications can be determined based on a PRA where this assessment demonstrates that the risk from contamination can be satisfactorily reduced to an acceptable level. This is considered to be the case for the Scheme, because the PRA concludes that all plausible contaminant linkages are either of low or very low risk and can be mitigated through the control measures within the Outline CEMP, including necessary pre-construction ground investigations and an emergency protocol for unexpected contamination. Compliance with the	GWNC-WAA-SS50-XXXXXX-RPT-ES-000001

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		recommendations of a PRA is anticipated to be subject to agreement with SHDC via associated planning condition(s).	
Environment Agency			
"The Flood Risk Assessment (FRA) does not comply with the requirements for addressing residual risk as set out in paragraphs 041,042 and 043 of the Planning Practice Guidance Flood Risk and Coastal Change 2025 which does not adequately assess the residual flood risk to the site in the event of failure or non-operation of Lord's Sluice / pumping station. It has therefore not been demonstrated that the development would be safe for its lifetime, or that appropriate mitigation and resilience measures are included within the design."	Flood Risk and Hydraulic Modelling	The Applicant has been engaging frequently with the EA throughout design development and to inform the assessments submitted in support of the Planning Application. This has included agreement of the scenarios to consider with the FRA, specifically including the breach scenario and climate change allowances. Following the submission of the Planning Application, technical engagement meetings have been held to discuss a proportionate approach to providing further supplementary evidence with respect to projected flood levels in the event of IDB pumping station failure, which are not likely to exceed those assessed in the FRA under a River Welland flood defence breach scenario. Discussions have also subsequently been had with the IDB to understand the operational regime of the Lord's Drain Catchment and the availability of associated modelling data. The Lord's Drain Catchment model has been received from the IDB. The Applicant's hydrology specialists are conducting a review of the model package to inform further discussions with the EA over a proportionate approach to considering the 'failure or non-operation of Lord's Sluice / pumping station' A technical note will be prepared and submitted to SHDC in August 2026 to provide further justification of the statement within the FRA that any flood levels associated with either failure of the Lords Drain sluice/pumping station or IDB watercourses are below those assessed within the FRA. It therefore remains the view of the Applicant that appropriate mitigation and resilience measures are included within the design based upon assessment of residual risk, given the flood level of the proposed substation and the drainage measures included within the design and is therefore compliant with the NPPF.	GWNC-WSP-SS50-XXXXXX-RPT-ES-000002
"We object to the design of the illustrative watercourse outfall basin proposed as part of this planning application as the information provided indicates that there will be a detrimental impact on European eel. We therefore recommend that planning permission is refused. *Reason:* - *The European eel (Anguilla Anguilla) is a protected species under the Eels (England and Wales) Regulations 2009, is listed under section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 and is listed as Critically Endangered on the IUCN Red List.* - *The information provided indicates that the watercourse outfall basin proposed may have a detrimental effect on the species/population and its habitat along any watercourse where an outfall is proposed. The application does not include adequate information about the measures proposed to protect European eel in this location. In particular, the application fails to incorporate design measures to ensure that European eel are excluded from entering the outfall. There is the risk that any proposed outfall to a watercourse that contains eel, may act as an attractive flow to eel which could allow subsequent entrapment of eel into the outfall and beyond.* *This objection is supported by paragraphs 187 and 193 of the National Planning Practice Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated*	Fisheries	The Applicant notes the protection status of European eel (*Angilla anguilla*) under the Eels (England and Wales) Regulations 2009, section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 and that it is listed as Critically Endangered on the International Union for Conservation of Nature (IUCN) Red List. The detailed design of the Proposed Development is not yet complete and therefore detailed design drawings of the outfalls cannot be provided at this stage. However, the Applicant will ensure that all legal requirements relating to protected species will be adhered to. The approach to the outfall design will specifically adhere to the following principals: • Where viable, outfall levels will be positioned at an appropriate height to deter the ingress of European eel. This will be informed by Q20 (equivalent to a 1 in 20 return period) flood level data and outfall levels will be positioned above this. • Where it is not viable to position the outfall invert level at a sufficient height relative to the Q20 flood level, supplementary control measures will be adopted to ensure that European eel are excluded from entering any outfalls e.g. appropriate screening measures. There are a range of well-established screening measures (e.g. mesh screens) available to prevent eels and fish from entering drainage systems and becoming trapped. Use of these measures would effectively isolate the outfall pipes and SuDS basins from the existing IDB watercourses with respect to potential use by eels or fish, therefore avoiding entrapment. Discharge rates from the outfalls will be specified within the CEMP, and any secondary construction activity permits required for outfall discharges will be approved by the EA. These measures will prevent deterioration of the receiving watercourse by minimising erosion and ensuring that discharged water does not adversely affect water quality. Location of outfalls (temporary and permanent) are detailed in the Water Framework Directive (WFD)a report as followed: Temporary: WC_WM_61, WC_WM_63, WC_WM_69 (Lord's Drain), WC_WM_85, WC_WM_95, WC_WM_103, WC_WM_115, WC_WM_129; Permanent R11 and WC_WM_74. In addition, any in channel works (e.g. culvert installation) will be overseen by an Ecological Clerk of Works (ECoW) who will provide on-site ecological supervision and advice during construction works to ensure that environmental commitments, planning conditions, licence requirements, and wildlife legislation are complied with.	GWNC-WSP-SS50-XXXXXX-RPT-ES-000001 GWNC-WSP-SS50-XXXXXX-RPT-ES-000003 GWNC-ARU-SS50-XXXXXX-RPT-ES-000015 GWNC-ARU-SS50-XXXXXX-RPT-ES-000005 GWNC-GIL-SS50-XXXXXX-PLN-ES-000001 GWNC-ARU-SS50-XXXXXX-RPT-ES-000019

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for, planning permission should be refused. Opportunities to incorporate biodiversity in and around developments should be encouraged. *Paragraph 41 of The Habitat Regulations 2017 also recognises rivers and their banks as essential for the migration, dispersal and genetic exchange of wild species and the proposed changes to the watercourse and its corridor will disrupt this linear habitat by causing the entrapment of European eel in undesirable habitat where escapement may not be possible.* *Section 40 of the NERC Act 2006 as amended by section 102 Environment Act 2021, also establishes a general duty on public authorities, to conserve and enhance biodiversity through the exercise of its functions. Therefore, we as a public authority must assess how proposals within our remit could conserve and enhance biodiversity and include this as part of our decision-making process when considering external proposals."*		Based upon the information provided above and that submitted in support of the Planning Application, the Applicant has provided information which demonstrates that measures have been included to conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. This is evidenced through the Biodiversity Net Gain Report, EcIA, Indicative LEMP and Outline CEMP. The Applicant proposes a condition requiring the submission of a detailed design, including the design of outfall infrastructure, prior to the commencement of development.	
"In relation to diversion of watercourses: There are proposals to divert watercourses as part of the scheme. We request to be consulted on detailed designs of the proposed diversions to ensure that designs are appropriate for wildlife and that there are maximum benefits gained for wildlife"	Watercourse Diversion	The Applicant notes that the EA request to be consulted on detailed designs of the proposed diversions to ensure that designs are appropriate for wildlife and there are maximum benefits gained for wildlife. The Applicant has been liaising with the South Holland IDB on the watercourse diversion and will continue to do so as the Scheme progresses towards detailed design. The Applicant is supportive of, and will seek to facilitate, engagement with the EA during this process, noting that the detailed design must meet the requirements of the IDB as the responsible management authority for the diverted asset.	GWNC-WSP-SS50-XXXXXX-RPT-ES-000001
"We object to the proposed development as submitted because it involves the use of a non-mains foul drainage system but no assessment of the risks of pollution to the water environment has been provided by the applicant. We recommend that unless and until the applicant provides adequate information to demonstrate that the risks of pollution posed can be safely managed then planning permission should be refused. *The application form indicates that foul drainage is to be discharged to a non-mains drainage system. In these circumstances the PPG for Water Supply, Wastewater and Water Quality ref ID: 34-020-20140306 advises that applications for developments relying on anything other than connection to a public sewage treatment plant should be supported by sufficient information to understand the potential implications for the water environment. In this instance no such information has been submitted.* *Reason:* *The application does not provide a sufficient basis for an assessment to be made of the risks of pollution to the water environment arising from the proposed development.* *In particular, the submitted application fails to be clear about the proposed method of storage and disposal of foul waste. Whilst the Application form states a 'cess pit' will be used to dispose of foul sewage, and the Foul Drainage Assessment Form and Foul Drainage Strategy propose a cesspool, other documents are different. The Outline Construction Environmental Management Plan (OCEMP) says in W13 "Foul water and sewage effluents produced by the construction workforce will be contained by temporary foul drainage facilities (such as a septic tank)", and GWNC-LST-0H70 ZZZZZZ-DRW-EN-000032 A Illustrative*	Foul drainage (Operation)	For the permanent works (not the construction phase or related works), it can be confirmed that the proposed site will use a cesspit for the collection of foul flows from the welfare building. The justification and rationale, using the Building Regulations Part H as the guiding principles, are outlined in the attached Technical Memo, Ref.; PDD-100944-TM-002, dated 11th May 2026. The site is to be occupied by up to a maximum of 11no operatives/staff members. It should be noted that occupancy of this figure is only for significant, and so infrequent, maintenance operations and so provides a conservative basis for the assessment of foul flows. As noted in the Technical Memo, the facility is normally unnamed and so the building will be only intermittently occupied by operational and maintenance staff. British Water Flows and Loads (Version 4), provides a means of assessment for daily volume of flows from a range of activities/buildings. For a typical industrial office /factory with a canteen, the volume generated is 50l per person per day. With a staffing level of 11no. persons, this would generate a total daily volume of 1.1m^3. However, the stated daily foul flow of 1.1 m^3 represents a conservative design figure and is unlikely to occur consistently, as water use in an office setting varies with staffing levels and operational patterns. In practice, foul flows are intermittent and typically occur in short peaks, meaning average daily volumes are generally lower than the assumed maximum. As is standard practice for National Grid sites, it is proposed to use a 9000 litre capacity cesspit. This will permit emptying operations in excess of one week during these peak periods, and significantly longer during other, less intensive, usage periods. It is therefore considered that the proposed 9000litre cesspit has adequate capacity. As illustrated in Appendix C of the attached Technical Memo, the cesspit is located within the site, in open space near to the welfare building. This facilitates safe and convenient access for emptying and ongoing maintenance without the need for access to the main substation compound where high voltage apparatus is located (it can be accessed from the staff access road and parking area). The cesspool will be managed through a proactive maintenance regime, including continuous level monitoring via a high-level probe and/or telemetry such that it will operate without overflow during normal conditions. Emptying will be undertaken by a licensed contractor at least monthly, or as indicated by monitoring systems. Compared to treatment-based alternatives, the cesspool offers reduced failure risk and predictable performance, thus significantly reducing the potential for pollution to the water environment.	GWNC-WSP-SS50-XXXXXX-RPT-ES-000001

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Construction Compound also mentions treated discharge from a septic plant. As such, we are unclear if the proposed foul drainage system will be designed to be a sealed cesspool, or a septic tank with discharges which could consequently contaminate the water environment. *Additionally, the submitted application fails to address the following issues as set out Paragraph H1 of Schedule 1, Building Regulations 2010 in order to demonstrate that the proposed foul drainage system will be designed and sited such that any septic tank or cesspool is of adequate capacity and is appropriately designed, and that there is adequate means of access for emptying work and future maintenance, including future replacement of any drainage fields and infiltration systems for use in wastewater treatment."*	Foul drainage (construction)	The final details of temporary foul drainage during construction would be agreed as per the final CEMP, the agreement of which with SHDC is anticipated to be the subject of planning conditions(s). However, the basis of the Planning Application is that foul drainage would be contained in a temporary cesspit (approx. 13600 litres), that would be located within the identified main compound area and buried partially within the ground due to gravity requirements. This cesspit would be accessible from the top to allow for weekly emptying by a tanker. The temporary cesspit would be bunded and there would be no discharge. Spill kits would be located close to the tank and a 24-hour emergency response team could attend if required. Only trained individuals would be able to empty the tank in accordance with robust protocols. The use of such temporary foul drainage equipment is common practice within the construction industry where connection to the mains network are not readily available and establishing such connections would result in disproportionate cost and potential wider environmental effects. The indicative Main Compound Layout (GWNC-LST-OH70-ZZZZZZ-DRW-EN-000032-A) submitted with the application would be subject to detailed design and the Applicant would request this details is controlled by a condition, and then seek approval from the local authority for the final design prior to implementation. As stated above, the anticipated solution would be a cesspit with waste material tankered off site.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000019
"The hydrogeological setting presents a low risk to controlled waters however the applicant is already undertaking intrusive investigation works." The consultee recommend the inclusion of planning conditions specific to this matter	Groundwater and Contaminated Land	The Applicant notes the proposed planning condition requiring the submission of an updated PRA and conceptual model following the results of an exploratory investigation and, if required, subsequent detailed risks assessment and appraisal and specification of appropriate remediation measures. This is consistent with the Applicant's intended approach based upon application of a proportionate, tiered approach.	GWNC-WAA-SS50-XXXXXX-RPT-ES-000001
The consultee recommended the inclusion of a condition specific to a verification matter.	Verification Report	The Applicant notes the proposed planning condition requiring the submission of a verification report demonstrating completion of works set out in the approved remediation strategy. Subject to the findings of an updated PRA and conceptual model, a remediation strategy may not be required.	GWNC-WAA-SS50-XXXXXX-RPT-ES-000001
The consultee recommended the inclusion of a condition specific to a previously unidentified contamination.	Previously Unidentified Contamination	The Applicant notes the proposed planning condition relating to procedures in the event of previously unidentified contamination being found. Control measure GH8 included within the Outline CEMP submitted in support of the application is relevant to this request given the Applicant has proposed a protocol for dealing with any unexpected contamination will be included in the final CEMP.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000019
"In line with the Welland Five Year Catchment Plan (2022-2027), we recommend that the proposed development is used as an opportunity to restore more natural processes to the watercourse. Specific enhancements that would support measures from the RBMP include incorporating a natural channel morphology to the realigned watercourse. This would provide an environmental benefit to the catchment. *In line with the Greater Lincolnshire Local Nature Recovery Strategy, we recommend that the proposed development is used as an opportunity to address local nature priorities. Specific actions that would support identified measures include planting-up the riparian zone with suitable wetland vegetation (such as wet grassland or wet woodland) and managing the watercourse to keep it wet throughout the year and maintaining a low nutrient input. This would provide wider environmental benefit by addressing water quality issues and providing habitat."*	Biodiversity	The Welland Five Year Catchment Plan (2022-2027) is an action plan of specific projects, schemes and sites that has been developed with the aims of improving water quality, improving habitat quality, improving water resources and improving the river for People and Wildlife. The actions set out within this plan are outside of the scope of the proposed scheme. The Greater Lincolnshire Local Nature Recovery Strategy (GLLNRS) is a tool to guide action for nature recovery. The main objectives include increased and improved sites for nature, larger populations of species, increased benefits to people from nature, agricultural resilience, and reducing the impacts of climate change. The tool is not intended to place new restrictions on developing land. It is however the position of the Applicant that the Proposed Development does not conflict with the aims and objectives of these strategies and the design has been developed based upon consistent design principles. As noted above, with respect to the realigned watercourse, the Applicant has been liaising with the South Holland IDB on the watercourse diversion and will continue to do so as the Scheme progresses towards detailed design. This has included discussions directly relating to measures which would provide biodiversity benefits, including geomorphological variation along the length of the diversion. The Applicant is supportive of, and will seek to facilitate, engagement with the EA during this process, noting that the detailed design must meet the requirements of the IDB as the responsible management authority for the diverted asset. While the development includes biodiversity enhancement within the design, it is not possible to deliver all required biodiversity gains on-site. National Grid recognises that contributing to larger, strategic off-site BNG projects with trust third-party unit providers is likely to deliver the best outcomes for	GWNC-ARU-SS50-XXXXXX-RPT-ES-000015

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		biodiversity, as well as wider environmental benefits. A preference will be given to off-site units that can be purchased locally to Weston Marsh. The criteria for unit providers to be listed on National Grid's Qualifying Utilities Dynamic Market (QUDM) biodiversity unit procurement framework includes a requirement to demonstrate benefits such as environmental education, learning and skills. National Grid is therefore committed to delivering BNG for the Substation Works that has benefits for local biodiversity and wider environmental and social benefits.	
"The proposed development includes the culverting of the ditch networks. The Environment Agency prefers that clear-span bridges are considered if crossings are required across wet (i.e. non-ephemeral) watercourses and strongly encourage removal of any existing culverts to further enhance watercourses. *We are opposed to the culverting of any watercourse because of the adverse ecological, flood risk, geomorphological, human safety and aesthetic impacts. Watercourses are important linear features of the landscape, wildlife corridors and should be maintained as continuous corridors to maximise their benefits to society. Culverting damages habitats, interrupts wildlife corridors and disrupts river habitat continuity. Paragraph 41 of The Conservation of Habitats and Species Regulations 2017 states that wildlife corridor networks should be protected from development and where possible, strengthened by or integrated within it."*	Use of culverts	A proportionate and risk-based approach has been adopted to review all temporary haul road watercourse crossings. Each crossing has been assessed against a defined mitigation hierarchy, with a preference for avoiding changes to existing watercourses and crossing arrangements wherever practicable. The hierarchy prioritises retention of existing crossing types and locations, followed by targeted improvements where environmental, hydraulic, geomorphological or ecological constraints are identified. The review considered crossing type, location and alignment relative to watercourse flow, taking account of factors including WFD designated waterbodies, presence of designated chalk streams, watercourse morphology, channel size, flow characteristics and potential construction access encroachment. Where intervention is required, preference is given to clear-span crossings. Where clear-span solutions are not reasonably practicable, open-bottom structures (e.g. portals, arches or three-sided culverts) are considered before closed culverts. The hierarchy applied is summarised below: 1. Retain the existing crossing type and location. 2. Upgrade crossings on larger or more sensitive watercourses to clear-span structures, where feasible. 3. Re-align skewed crossings so they are perpendicular to the direction of flow. 4. Upgrade crossings on designated chalk streams and WFD waterbodies to clear-span structures. 5. Relocate crossings from bends or meanders to straighter sections of channel. 6. Amend crossing locations where construction access would otherwise encroach into the watercourse corridor. 7. Where necessary, change both the crossing type and location to reduce environmental and hydraulic effects. Following application of this hierarchy, each crossing was categorised according to the degree of change required, ranging from no change to crossing type or location, through to changes in crossing type, location and/or skew, thereby providing a transparent and consistent basis for crossing design development. This approach follows established precedent by applying a proportionate, risk-based hierarchy to watercourse crossings. The proposed crossing types have been informed by technical appraisal by WFD, aquatic ecology and terrestrial ecology disciplines. In recognition of the need to balance cost, buildability and environmental considerations, clear span bridges have been proposed based upon a risk-based approach, in locations where sensitive receptors have been identified. There are a total of 11 watercourse crossings required to deliver the Scheme. Five of these are clear span bridges, with the remaining six culverts. The use of culverts would not result in significant effects upon the water environment following the application of best practice measures controlled via the CEMP. As set out within the Outline CEMP, where temporary culverts are proposed, they will be sized to reflect the span width and the estimated flow characteristics of the watercourse under peak flow conditions and kept free from debris. Natural substrate will be provided through temporary watercourse crossings culverts. Watercourse bed and banks will be subject to full reinstatement on removal of temporary watercourse crossings on completion of construction works. Specific detailed designs for each watercourse crossing, consistent with these design principles, will be prepared by the Main Works Contractor(s).	GWNC-ARU-SS50-XXXXXX-RPT-ES-000019 GWNC-ARU-SS50-XXXXXX-RPT-ES-000005

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"Otters and water voles may be present at the proposed development site. These species are listed under section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. *The proposed development will therefore only be acceptable if the applicant has surveyed the watercourses that were not accessible during the initial surveys, to determine the presence/absence of otters and water voles. Without this condition we would object to the proposed development because it cannot be guaranteed that the development will not result in significant harm to otters or water voles."*	Otter and Water Voles	It is acknowledged that some protected species surveys were ongoing at the time of submission. With respect to Otter and Water Voles, updated survey report reflecting these findings will be provided to SHDC in August 2026. Based upon the survey findings for otter and water vole, the conclusions of the EcIA submitted in support of the Planning Application are unchanged. Following the implementation of embedded mitigation and control measures outlined within the Outline CEMP, residual effects resulting from the construction and operations phases are predicted to be negligible and not significant for both water vole and otter.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000012 GWNC-ARU-SS50-XXXXXX-RPT-ES-000019
"The proposed development will be acceptable if the following measures are implemented and secured by way of a planning condition on any planning permission. The applicant has not provided committed to how drainage associated with the substation will be isolated and disposed of in the event of a fire or pollution incident, therefore there could be impacts on the Lord's Drain or River Welland which must be considered in accordance with Policy 187 of the National Planning Policy Framework." The consultee included a condition specific to substation drainage.	Water Quality	There is no oil-filled high-voltage plant or equipment, such as transformers, proposed within the Weston Marsh A Substation. The only oil-filled plant proposed will be a standby diesel generator, which will be self-bunded and is expected to operate only infrequently during emergency or maintenance scenarios. Should any oil-filled equipment be required as part of the detailed design, it would be installed within a suitably sized bund designed to contain both the total oil volume and any associated fire-fighting fluids, in accordance with National Grid technical specifications TS 2.10.01 – Oil Containment. Given the nature of the proposed equipment, the most probable fire scenario would be associated with the main Control & Amenities building rather than the electrical switchgear. In the event of a switchgear fire, it is anticipated that the local Fire and Rescue Service would adopt an appropriate response strategy for electrical equipment fires, which may not involve the direct application of water to energised equipment. The majority of the substation platform will be a free-draining surface comprising aggregate/granular material. Surface water will be intercepted primarily through a network of filter drains positioned below the free draining surface, with suitable linings/membranes to ensure that percolating waters do not bypass the proposed network. Bunded facilities (those containing oils and other hydrocarbons) will have a Bund Water Control Unit (BWCU) installed, which are fitted with hydrocarbon sensors which automatically shut off discharges to the receiving surface water network in the event of a leak or contamination of discharges from these areas. In accordance with the National Grid Technical Specification TS 2.10.09 - Site Drainage, these receiving networks will also be fitted with penstock chambers and oil interceptors in the immediate vicinity of the BWCU which can be used to further isolate potentially contaminated runoff. Automatic penstocks, incorporating manual back-up valves, are proposed as a precautionary measure to support the management of surface water flows and provide additional operational resilience. As required by with National Grid Technical Specification TS 2.10.09 - Site Drainage, penstocks will be provided at appropriate locations within the surface water drainage network, chiefly where systems enter or leave National Grid operational land. This allows discharges to be controlled or isolated in the event of accidental contamination. As a minimum, it is expected to include a penstock chamber at the final manhole chamber within the substation compound prior to discharge off-site. Consideration will also be given during detailed design to the provision of additional penstocks, including at the outlet to any attenuation features or pump station, where these would provide additional environmental protection. Where appropriate, pumping systems can also be shut down to prevent discharge to receiving IDB watercourses. The penstock chambers, together with other facilities and features of the site's drainage network, will be periodically inspected and maintained as part of a wider drainage management and maintenance plan, to ensure that they are operational and effective. In the event of a fire or pollution incident, penstocks would be automatically closed in accordance with the established procedures (see below) to contain contaminated runoff within the site drainage system preventing discharge to the receiving water environment. Any retained contaminated water or firefighting runoff would be sampled, assessed and removed from site by a suitably licensed contractor for treatment or disposal at an appropriately permitted facility. This ensures that contaminated water would not be permitted to enter local watercourses.	GWNC-WSP-SS50-XXXXXX-RPT-ES-000001

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		To manage any residual environmental risk, National Grid's Asset Operations team will prepare an Emergency Oil Containment and Drainage Plan. This will include the locations of key oil containment and drainage infrastructure, together with procedures for dealing with major incidents involving the spillages of oil. In addition, National Grid maintains arrangements with specialist Emergency Response Contractors who can be deployed to site to support incident response activities, including the provision of tertiary containment measures and the recovery of contaminated fire-fighting water. It should also be noted that geocellular storage tanks are currently not considered to be required located within the main substation platform and so do not form part of the operational drainage strategy. These elements were identified in GWNC-WSP-SS50-XXXXXX-RPT-ES-000001 as potential SuDS measures that could be incorporated, if required, to provide additional source control storage.	
The consultee included conditions specific to construction wastewater drainage.	Construction Wastewater Drainage	The details of construction drainage, is anticipated to be subject to agreement with SHDC via associated planning condition(s) for the final CEMP. Where practicable concrete mixing and washing down of mixing plant is to be carried out by the suppliers and away from the Scheme. Prior to any concrete being used on site the Contractor will produce a Concrete Washout Procedure, which will also include details of the emptying of concrete washout skips (if used) and the treatment of high pH washout water. Control measures will include: • Use only designated areas for concrete washout; • No concrete contaminated water is permitted to be discharged to the water environment (including groundwater); • Concrete, bulk and bagged, and concrete additives will be stored a minimum of 10 metres (increasing to 50m where practicable) away from watercourses, gullies and drains in properly secured, covered and bunded areas; • Any surplus concrete must only be discharged to a fully lined skip (or concrete washout system); • Discharge of wet/unset concrete onto ground, other than for defined works, is strictly prohibited; • Concrete washout skips will not be allowed to overflow and would be covered during heavy rainfall to prevent rainwater accumulation / creation of excess high pH waste; • Any excess water within concrete washout skips should be pumped to an Intermediate Bulk Container (IBC) stored within a bunded area, and the water treated (on or off site) to reduce pH; • Concrete washout skips should only be tipped out when completely dry (all water evaporated or pumped off) and when the concrete is fully set; • The integrity of the lining and available capacity of the concrete washout skip will be checked prior to the discharge. If there is damage or insufficient capacity to take the whole discharge the skip cannot be used; and • All staff will be trained on the risks of working with concrete (both health and safety and environmental risks). A suitable wheel washing system will be provided on a hard standing area and waste water will be managed and controlled in accordance with the final CEMP. The Contractor will ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permit, to minimise the risk of trackout of debris to the public highway Further details will be included within the final CEMP, which is anticipated to be subject to agreement with SHDC via associated planning condition(s).	GWNC-ARU-SS50-XXXXXX-RPT-ES-000019
"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	Storage of materials/chemicals/oil likely to cause pollution informative	The details of storage will be finalised prior to construction and specified within the final CEMP, the agreement of which with SHDC is anticipated to be the subject of planning condition(s). Oil, fuel and chemical storage location points will be identified on drawings (posted on notice boards) and clearly advertised with signage.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000019

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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:* *1. Whilst we welcome details stated in GG11 Vehicles will be correctly maintained, however we suggest when they are stationary that drip trays are installed.* *2. 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.* *3. 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 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."*		Storage areas will: • Have an impermeable base; • Have control measures in place such as a minimum of 110% bund capacity, • Have adequate spill kits easily accessible; • Be adequately signed/labelled, indicating their contents and any hazard warning signs; • Be secured against damage/theft/vandalism; • Be located away from areas of vehicle movement to avoid impact and damage; and install protective barriers or fencing where required; and • All filling points, valves, filters, sight gauges, vent pipes, and taps must be located within the bunded area. Vehicles and plant will be fitted with drip trays when stationary. All fuels oils and chemicals will be stored with appropriate secondary containment, with a minimum of 110% capacity. All storage containers used for fuels, oils and chemicals will be covered to prevent rainwater ingress. Appropriate procedures, training and equipment will 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.	
"Having reviewed GWNC-ARU-SS50-XXXXXX-RPT-ES-000019 Outline Construction Environmental Management Plan (OCEMP), we request confirmation from the Applicant whether there will be any water quality monitoring onsite prior to construction starting to establish a baseline, and whether any water quality monitoring is intended throughout construction phase. We note that GG05 and GG07 state about pre-condition survey and a pre-construction site walkover, but what this entails is unknown. *Having a water quality monitoring plan that has pre-construction, during construction, and post-construction phases is in line with best practice. Monitoring should start at prior to construction so that the water quality of any possibly affected areas is known before significant sediment is disturbed and hazardous substances are on site. It should continue throughout construction and into operation to ensure there is no decrease in water quality as a result of the phase change. Locations should include monitoring upstream and downstream of any proposed surface water outfalls and water crossings. Whilst walkovers for visual and olfactory observations can support water quality monitoring, methods for a more quantitative assessment should include in-situ measurements and water samples, both using MCERTS approved methods, with the latter to be sent to a UKAS accredited laboratory."*	Water quality monitoring informative	The mitigation measures identified to minimise impacts on surface water quality during construction are based on industry best practice, which can reasonably be considered effective based on precedent. Therefore, the Applicant does not consider water quality monitoring during construction to be proportionate due to the scale, nature and location of the Scheme and taking into account mitigation measures already proposed within the Outline CEMP. On this basis, water quality monitoring on site prior to construction is not proposed as a general measure within the Outline CEMP Furthermore, most construction activities will take place away from watercourses, and standoff distances have been identified which will further minimise the likelihood of uncontrolled discharge of runoff from working areas into watercourses. Therefore, the most likely pathway for any water quality effects on watercourses is via discharges from temporary surface water drainage systems or from temporary works within watercourses relating to watercourse crossings and the diversion of an ordinary watercourse around the substation platform. These activities will be subject to gaining the relevant environmental permit or consent post-grant of the planning permission. Discharges from temporary drainage systems will be subject to EA consent via Construction Water Discharge Activities Permits. Works directly affecting watercourses will be subject to consent from the relevant drainage authority (Flood Risk Activities Permit from the EA for main rivers; Land Drainage Consent from the IDB for ordinary watercourses). Should the consenting authority choose to impose water quality related permit conditions on any of these secondary consents, then National Grid would ensure that appropriate water quality monitoring is deployed to demonstrate compliance. Arrangements for construction phase water quality monitoring will be developed in consultation with the EA and other relevant stakeholders as part of the process of detailed temporary works design for construction that will take place following grant of planning permission. This is secured via the local planning authority approval of the final CEMP, which would incorporate monitoring requirements for demonstrating compliance with specific secondary permit or consent conditions as required.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000019 GWNC-WSP-SS50-XXXXXX-RPT-ES-000003

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"In addition to planning permission, you may also require an Environmental Permit from the Environment Agency. Please note that the granting of planning permission does not guarantee the granting of an Environmental Permit. Upon receipt of a correctly filled in application form we will carry out an assessment. *Drainage fields and infiltration systems for use in wastewater treatment used to serve a non-mains drainage system must be sited no less than 10 metres from the nearest watercourse, not less than 10 metres from any other foul infiltration system and not less than 50 metres from the nearest potable water supply.* *Where the proposed development involves the connection of foul drainage to an existing non-mains drainage system, the applicant should ensure that it is in a good state of repair, regularly de-sludged and of sufficient capacity to deal with any potential increase in flow and loading which may occur as a result of the development."*	Environmental Permit Informative	The Applicant will apply for all relevant consents following determination of the application and ensure full compliance with the relevant permitting regimes.	
South Holland IDB			
"The Board's Officers have reviewed the documents submitted in support of the above planning application. Officers have noted works which require Land Drainage Consent from the Board as outlined in the table below and detailed overleaf. We recommend that any required consents are sought prior to the determination of this planning application ***however the proposed works are currently unlikely to be acceptable*** *to the Board"*	General	The Applicant is in ongoing discussions with South Holland IDB in relation to detailed design of the Proposed Development and compliance with byelaws. The Applicant acknowledges that a number of IDB Consents will be required prior to the construction phase commencing. In instances where IDB consents are required, it is common practice for such consents to be secured at a later stage to the associated consent under the TCPA. This is consistent with agreement of details in relation to wider aspects of the Proposed Development, including relevant planning conditions and required further consents, permits and licenses. Further technical information is provided below in relation to the specific matters raised.	
"I note the presence of a Board arterial watercourse (R11 New Drain) within the Weston Marsh A substation site boundary and that works are proposed to alter this watercourse including infilling and diverting the watercourse around the eastern perimeter of the proposed site (ref. Surface Water Drainage Strategy, Appendix D, PDD-100944-LAY-404. P02). To enable this proposal Land Drainage Consent is required under Section 23 of the Land Drainage Act 1991 (and byelaw 4) and I recommend that the applicant contacts this office to make an application for this consent at their earliest convenience. *At this stage insufficient detail regarding the proposed route of the diversion and the potential for conflict between the Board's maintenance strip and existing utilities easement zones. If there is a conflict (overlap) between the Board's future maintenance strip of the realigned watercourse and the gas / utility easement this could severely impact the Board's ability to carry out its functions and ultimately increase flood risk locally. Resultantly, it is currently likely that the proposals are not acceptable in line with the Board's policies and so the Board currently objects to this application pending further detail and engagement."*	Section 23, Land Drainage Act 1991/Byelaw 6	The Applicant acknowledges that works to divert and partially infill the R11 New Drain will require Land Drainage Consent under Section 23 of the Land Drainage Act 1991 and the relevant IDB byelaws. The Applicant is engaging with the IDB and will submit the necessary consent application in due course. The Applicant also notes the Board's concerns regarding the relationship between the proposed realigned watercourse, the required maintenance strip, and existing utility easements. Further design development and engagement with the IDB are ongoing to ensure the diverted watercourse can be accommodated whilst maintaining appropriate access for watercourse maintenance and respecting the requirements of existing utility infrastructure. Additional information will be provided to the Board as the design progresses. The Applicant remains committed to working collaboratively with the IDB to resolve these matters and address the Board's concerns through the detailed design and consenting process.	
"I note that the applicant intends to carry out works within 9 metres of two Board arterial watercourses, R11 New Drain and R07 Lord's Drain. To enable this proposal, Land Drainage Consent would be required under Byelaw 10, and I recommend that the applicant	Byelaw 10	Works within the 9 m easement of the Board's maintained watercourses R11 New Drain and R07 Lords Drain will be assessed and confirmed through detailed design. Land Drainage Consent under Byelaw 10 will be sought separately from the Board for works within 9m of the R11 New Drain or R07 Lords Drain above.	

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contacts this office to make an application for this consent at their earliest convenience. *At this stage insufficient detail regarding proposed works within 9 metres of these watercourses have been provided to enable officers to determine whether they are likely to will increase flood risk, hinder the Board's operations (including but not limited to the Board's usual way of working, current access arrangements, available resources and the risks posed to Board employees, now or in the future) or be acceptable in accordance with the Board's policies. Therefore the Board currently objects to this proposal pending further detail and engagement.* *Where powerlines are crossing Board arterial watercourses, consideration must be given to the frequent use of long reach machinery beneath the powerlines."*			
"The applicant has provided a Surface Water Drainage Strategy for the operational phase of the substation works. This response is based on that document. *The applicant has indicated that infiltration to the ground is not feasible for disposal of surface water, based on ground investigations, and therefore intends to discharge surface water to watercourses. In this case, consent would be required under Byelaw 3. The Board recommend that any discharge is in line with the National standards for sustainable drainage systems (SuDS) published in June 2025. Further to the National Standards for SuDS, the Board's policy is to restrict discharges to the annual average flood flow rate (QBar or QMed) so we are pleased to note from the Surface Water Drainage Strategy that the applicant proposes that "discharge from the proposed development to be limited to QBAR greenfield rates. Final rates and volumes subject to confirmation at detailed design" (Appendix D, PDD-100944-LAY-404. P02).* *We also note that section 8.1.4 may contradict the same document by stating that rates will be limited "as close as possible to greenfield rate" and furthermore section 8.1.6 states that "peak discharge rates may be dictated by minimum flow requirements of the pump". We seek reassurance that discharges will be limited to the QBar rate and recommend that this is a requirement of any eventual planning permission.* *Regardless of the proposed discharge rates, this proposal will require Land Drainage Consent from the Board under Byelaw 3. Please note that any consent granted for the discharge of surface water is likely to be subject to a Surface Water Development Contribution fee (SWDC) as outlined within our Development Control Charges and Fees.* *In addition to the above, I would like to take this opportunity to make the applicant aware that should they discharge surface water temporarily to a watercourse (i.e. ground dewatering during construction), additional temporary consent is required under Byelaw 3."*	Byelaw 3 – Substation	The South Holland IDB's planning comments are noted, including the observation that the Outline Drainage Strategy contained inconsistent wording in relation to the proposed discharge rate and the request for reassurance that discharge would be restricted to QBar. The wording within the outline submission reflected an intention to restrict discharge to greenfield rates where practicable, while also acknowledging that the final discharge rate may be at a rate greater than QBar to limit the risk of blockage and may be influenced by the operational requirements of the proposed pumped system. As detailed design has progressed, the practicable pumped discharge approach has been reviewed against the applicable Water Management Alliance (WMA)/IDB policy criterion for surface water discharge (WMA Policy: Discharge of Surface Water). On that basis, the discharge strategy has been developed in accordance with the policy requirement of 2 l/s/ha or QBar, whichever is higher, rather than by direct reference to the calculated greenfield QBar rate alone. This principle is also supported by the National Standards for Sustainable Drainage Systems, which state that the peak allowable discharge rate from a development to surface waters or sewers for the 50% Annual Exceedance Probability (AEP) event should be limited to the equivalent 50% AEP greenfield runoff rate, or 3 l/s/ha, whichever is greater. During consultation, Lincolnshire County Council (LCC) advised that confirmation from the IDB on the QBar rate should be sought and noted that, although a higher rate may be acceptable for the pumped system, this could have associated maintenance cost implications. This indicates that the consultation position recognised the potential for a pumped discharge rate above the calculated greenfield runoff rate, subject to agreement with the IDB. Restricting the final pumped discharge rate to the calculated greenfield runoff rate would materially increase the attenuation volume required and could significantly affect the basin size and wider drainage design to an extent which impinges on the practicability of other elements of the scheme. In this context, and given that the proposed discharge approach remains aligned with the WMA Policy, the applicant anticipates that this will be subject to agreement with SHDC via associated planning condition(s) for the preparation and submission of a surface water drainage strategy. Final discharge rates and volumes will be confirmed through detailed design and will remain subject to separate Land Drainage Consent from the Board under Byelaw 3. Detailed design information will be shared with the IDB for review in due course.	GWNC-WSP-SS50-XXXXXX-RPT-ES-000001

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"I cannot see that the applicant has identified a drainage strategy for the haul roads within their application. We recommend a drainage strategy is provided for the site. If the applicant proposes to discharge surface water to a watercourse, consent would be required under Byelaw 3."	Byelaw 3 – Permanent Access Road and Temporary Haul Road	**Operation** - A swale is proposed along the substation access road to manage runoff arising from it and provide additional water quality benefits. The swale's design may be adjusted based on mitigation area requirements and could serve as a nature-based solution supporting broader project goals. **Construction** - The final details for construction drainage would be agreed as per the final CEMP and detailed temporary works design, the agreement of which with SHDC is anticipated to be the subject of planning conditions(s). However, it is assumed that surface water drainage resulting from the construction haul roads would be contained within SuDS basins (see illustrative drawings accompanying the submission which provided details for the construction phase drainage for watercourse outfall attenuation basins). Each attenuation basin outfall has been determined in accordance with the drainage hierarchy, resulting in a surface water watercourse or body outfall being identified for all 11 catchments within the Substation Works Site Boundary. Outfalls to a surface water watercourse or body will be installed with a restricted flow rate and recessed headwall. To control the risk of pollution and sediment transfer, the attenuation system is proposed to comprise three sequentially linked basins. Each basin will be vegetated using a native grass seed mix, with stone or earth weirs provided between stages to promote settlement and treatment prior to discharge, in line with LCC SuDS Guidance. All surface water discharges will be subject to approval from the Lead Local Flood Authority (LLFA) or IDB, dependent on the location of each specific catchment's outfall. The method of surface water conveyance to the attenuation basins will be designed at the appropriate juncture, in line with the track design. It is envisaged that this could be achieved via track side swales, which will add further treatment benefits, additional storage and provide easy maintenance access. Where swales are not suitable, traditional piped drainage could be utilised. It should be noted that the indicative storage volumes and SuDS sizes indicated have been based upon the full width of the proposed haul road swathe, which is likely to be wider than the final construction haul road design. Therefore, proposed attenuated storage volume at this stage may be refined as the project progresses. Where practicable, SuDS basins have been located outside of the EA's Flood Zones 2 and 3, and surface water flooding extents As per the above, the Applicant acknowledges that it will make a separate Land Drainage Consent from the Board under Byelaw 3.	GWNC-WSP-SS50-XXXXXX-RPT-ES-000001
"Please note that as the applicant's location plan includes land within the Board's ownership the proposals will require the applicant to enter into a Deed of Easement or suitable alternative with the Board."	Land Ownership	The Applicant has undertaken detailed land referencing across the Scheme, which has been continually reviewed and updated throughout the stakeholder engagement process to ensure that persons with interest in, or affected by the proposals are identified and consulted. The Board's ownership has been identified through this process. As such engagement with the Board has commenced with regards to the required agreements.	
Environmental Health Officer			
"We are in general agreement with the findings of the Desk study report, however the potential organic content of the Terrington Beds has not been considered in the ground gas risk assessment. We understand that further ground investigation and a ground gas risk assessment is proposed, and we are keen that when the ground gas risk assessment is undertaken that the potential consequences of a flood event are also considered." The consultee included 4 conditions to be placed on any permission granted relevant to land contamination	Land Contamination	The Applicant welcomes the general agreement of the SHDC Environmental Protection Team with respect to the findings of the Desk Study Report. The Ground Investigation Report commissioned by the Applicant is underway and includes monitoring data for the Tidal Flat Deposits (this includes Terrington Beds although not specifically identified) and a ground gas risk assessment. Information on ground gas is available in the draft Report for the Applicant to share with the Environmental Health Officer (EHO) on request if helpful at this stage. With respect to the proposed Condition 1, Condition 2, Condition 3 and Condition 4, it is noted that this feedback is consistent with that provided by the EA and the Applicant welcomes the proposal to address land contamination risks through the submission of further proportionate assessment based upon a tiered approach.	
"The report suggests that there will be a low impact to human health from changes in the local air quality, but that there will be a high level of impact due to dust soiling to residential receptors. It is proposed that mitigation measures will be used to lower that impact	Air Quality	The risk for dust impacts as a result of the Scheme were determined in the Air Quality Assessment and Screening Assessment. For dust soiling, it was determined the Scheme presents a medium risk for earthworks and construction and a high risk for trackout, which is the highest risk level as per the Institute of Air Quality Management guidance[3]. Mitigation measures have then been defined, as	GWNC-WSP-SS50-XXXXXX-RPT-ES-000004 GWNC-WSP-ZZZZ-ZZZZZZ-PLN-EN-000004

[3] Institute of Air Quality Management (2024) Guidance on the assessment of dust from demolition and construction [online] Available at: https://iaqm.co.uk/wpcontent/uploads/2013/02/Construction-Dust-Guidance-Jan-2024.pdf [Accessed 05 January 2026].

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to acceptable level, and that they will be detailed and specified in the final construction management plan. *However we are concerned that there are inconsistencies between documents in terms of the nature of haul road surfaces and the proposed mitigation. There are also variations in the proposed paved distance at road connections with some noting 5m and others 10m. The report suggest no backup generators will be in place yet one is shown on the plans.* *We are also concerned that the impact to the campsite has not been considered. We appreciate that the guests will be transient, however we would anticipate that a high level of dust soiling could be an issue where people expect to enjoy a high level of external leisure amenity.* *A significant quantity of soil will be imported to undertake the proposed land raise, and so it is very important that all lorries are sheeted when carrying soil materials, that there are wheel washes at each junction with the public highway, and that the road surface of haul roads are of a suitable material and well maintained to reduce this amenity level dust* *As there are inconstancies between the documents submitted, We consider it appropriate that the subject should be revisited when details are finalised, to ensure that the construction management plan is fully informed."*		reported in the Air Quality Assessment and Screening Assessment and the Outline CEMP submitted with the Planning Application. On this basis all effects identified as a result of the Scheme were determined to be not significant. The construction dust assessment has been reviewed based on the comments provided and they do not materially alter the assessment's findings nor the proposed mitigation measures; no further action is required. With respect to the proposed on-site backup generator shown in the operational plans, a screening exercise has been undertaken to determine whether detailed assessment of the potential impacts on local air quality associated with the generator emissions, which are expected to be principally comprise of oxides of nitrogen (NO_X) and particulate matter (PM_{10} and $PM_{2.5}$), can be screened out. The exact specification of the generator to be installed will not be determined until the detailed design stage but based on other similar sites operated by National Grid, it is anticipated that a 534-587 kW backup and standby generator operating on blended, low-carbon Hydrotreated Vegetable Oil (HVO) or diesel would be installed. Given the intended purpose of the generator, i.e., for emergency and failure provision, it expected that it will not be operated for more than 50 hours a year to allow for periodic testing and maintenance; this is consistent the EA's Best Available Techniques (BAT) for emergency generators (and consequently the generator unlikely to require a permit). A review of the local wind field, i.e., wind speed and direction data, collected over the past 5 years (2021-25) from the meteorological observation station at Holbeach, indicates that the prevailing wind direction for the area surrounding the proposed Weston Marsh A Substation is from the southwest, west and northeast. The area surrounding the substation is low-lying farmland which is expected to permit good dispersion of any emissions to air. The nearest sensitive human receptor (a residential property and holiday site) is located approximately 600 m north of the proposed location of the proposed generator emission point on Marsh Road. Other receptors within 1 km include the residential properties located to the west (and hence upwind) on Marsh Road (which are approximately 800 m away), Welland House Farm (1 km away), and those located to the northeast at Bottom Yard (750 m away), which is downwind. Vernatt's Drain and Surfleet Seas End Saltmarsh Local Wildlife Sites are located approximately 1.1 km to the west, i.e., upwind, and Surfleet Bank is approximately 1.7 km to the northwest and therefore located away from the prevailing wind directions. The Air Quality Assessment prepared to accompany the Planning Application indicates that existing baseline air quality is good, i.e., below the relevant air quality objectives, and levels of key air pollutants such as nitrogen dioxide (NO_2) and particulate matter (PM_{10} and $PM_{2.5}$) are likely to improve, i.e., reduce in future – see: Section 4 of the Air Quality Assessment (in document GWNC-WSP-SS50-XXXXXX-RPT-ES-000004). As set out in Table 4.4 of the Air Quality Assessment, background annual mean NO_2 concentrations across the study area are estimated to be up to 7.1 $\mu g/m^3$ (based on Defra predictions for 2026), or 13-18% of the relevant criteria, i.e., the annual mean NO_2 objective of 40 $\mu g/m^3$. Therefore, based on the relatively small size of the generator, the limited operational hours, the location and distance to the nearest sensitive receptors, and assuming favourable dispersion conditions, significant adverse impacts associated with the intermittent testing of the emergency standby backup generator are unlikely and can be scoped out of the Air Quality Assessment. Please see the response below in relation to variations in the proposed paved distance at road connections in relation to interfaces with the temporary haul road.	
*"**Operational Phase Noise – request further information prior to determination*** *Operational noise was scoped out at the start of the assessment, however we request some supporting information on this matter prior to determination. Background noise levels here would characteristically be very low, so please could the application provide additional information to support their conclusion, such as data from a similar / surrogate substation?* ***Construction Phase Noise – request condition*** *The report has assessed the proposed noise and vibration impact on identified residential receptors during construction, and*	Noise and Vibration	With regards to operational noise, the proposed substation would not contain notable noise generating plant items that may be associated with most substations, such as transformers. This is because voltage transformation would be done by the energy generator and the National Grid substation is for connections only and therefore transformers are not required. Therefore, in the absence of such sources noise generation from the National Grid substation is negligible. With regards to construction noise and vibration, the proposal is to address this issue through the provision of further information prior to construction, pursuant to the proposed Condition 6. It is however noted that the majority of construction activities are proposed to be undertaken during the working week between Monday to Friday (0700 to 1900). Flexibility has however been retained within the proposed working hours to reflect the requirement for certain activities to be completed outside of this period. For example, such activities include the installation and removal of conductors, pilot wires and associated	GWNC-ATG-SS50-XXXXXX-RPT-ES-000001

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concluded that the impact is acceptable. I am concerned about the proposed hours of working, given the lengthy duration of works. Care should be taken during planning the works to ensure that all noisy works should be scheduled to take place on weekdays unless there is genuinely no other alternative. *However, the report acknowledges that at this stage the assessment is based on proposed construction activities and associated indicative plant noise and vibration data & that further detailed assessments will be required."* The consultee has recommended a condition relevant to this topic.		protective netting across highways, railway lines or watercourses and the continuation of any work activity commenced during the core working hours to a point where they can securely and or safely be paused; this includes where continuous periods of construction are required, for works such as concrete pouring and finishing and electrical circuit pulling.	
"The construction & environmental management plan (CEMP) is indicative only at this stage, and is based on documents which are also indicative only at this stage. Therefore until the proposals are finalised, detailed review of the document is not appropriate. *Care must be taken in the final document to correctly identify all receptors, including the campsite. Care must also be taken to ensure that all potential sources have been identified -for example, generators in site compounds are not mentioned the air quality assessment (which informs the CEMP), and haul road surfacing varies by document."* The consultee has recommended a condition relevant to this topic.	CEMP	As stated within the Outline CEMP, it is intended the CEMP is a 'live document' and will be updated as and when there are changes to the project team or where additional information becomes available. The Outline CEMP is intended to provide the basis of a final CEMP, which would be prepared and agreed with the relevant consenting authorities in advance of the start of construction, subject to agreement with SHDC via associated planning condition(s).	GWNC-ARU-SS50-XXXXXX-RPT-ES-000019
"The lighting strategy is indicative only at this stage, and the use of lighting varies throughout the various reports submitted. This need sot be [sic] I have suggested an appropriate condition below, however please feel free to amend." *Prior to the installation of any external lighting associated with the development hereby permitted, a detailed External Lighting Scheme and Light Impact Assessment shall be submitted to and approved in writing by the Local Planning Authority.* *The scheme shall include, as a minimum, the following information:* *a) A layout plan showing the exact position, height, type, and orientation of all proposed external lighting units, luminaires, and support structures.* *b) Full technical specifications of all luminaires, including manufacturer datasheets, lamp types, wattage, lumen output, colour , and spectral distribution profiles.* *c) Details of optical control measures, including hoods, cowls, louvres, shields, or asymmetric lenses designed to eliminate upward light output and minimize lateral light spill.* d*) A comprehensive Isolux diagram (contour plot) showing predicted horizontal and vertical illuminance levels (in Lux) mapped across the site and extending a minimum of 10 meters beyond the site boundaries.* *e) An Operational Management Plan for the lighting, specifying standard operating hours, automated curfew protocols, dimming profiles for oU'-peak hours, and emergency/security lighting overrides. The external lighting shall be installed, tested, maintained, and operated strictly in accordance with the approved details thereafter. Within 1 month of the installation being completed, a post-commissioning verification report by a qualified*	Lighting	Following review by the Lighting design team, the Applicant proposes revision of the wording of Condition 8 - External Lighting to the below text: **Condition 8 – External Lighting** Prior to the installation of any external lighting associated with the development hereby permitted, a baseline survey is required to: a) Inform the environmental zone; b) Assess the existing lighting conditions; c) Confirm environmental and ecological sensitive receptors; d) Consider design standards and site-specific requirements. Based on the findings of the baseline survey, a Lighting Strategy and Environmental Lighting Impact Assessment will include, as a minimum, the following information: a) A layout plan showing the exact position, height, type and orientation of all proposed external lighting units, luminaires and support structures. b) Full technical specifications of all luminaires, including manufacturer datasheets, light source types, wattage, lumen output, colour temperature and spectral distribution profiles. c) Details of optical control mitigation measures, including hoods, cowls, louvres, shields or asymmetric lenses designed to eliminate upward light output and minimise lateral light spill. d) A comprehensive Isolux diagram (contour plot) showing predicted horizontal and vertical illuminance levels (in lux) mapped across the site and extending a minimum of 10 metres beyond the site boundaries. e) An Operational Management Plan for the lighting, specifying standard operating hours, automated curfew protocols, dimming profiles for off-peak hours, and emergency/security lighting override arrangements. The External Lighting Strategy and Environmental Lighting Impact Assessment Report is to be submitted to and approved in writing by the Local Planning Authority. The external lighting shall thereafter be installed, tested, maintained and operated strictly in accordance with the approved details. Within one month of completion of the installation, a post-commissioning	

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lighting engineer shall be submitted to the Local Planning Authority to confirm compliance with the approved parameters. *Reason: To minimize light pollution, safeguard the visual and residential amenities of the locality*		verification report prepared by a suitably qualified lighting engineer shall be submitted to the Local Planning Authority to confirm compliance with the approved parameters. Reason: To minimise light pollution and safeguard the visual and residential amenities of the locality.	
(Included within EHO comments on Air Quality) *We are concerned that there are inconsistencies between documents in terms of the nature of haul road surfaces and the proposed mitigation. There are also variations in the proposed paved distance at road connections with some noting 5m and others 10m.*	Clarification on dimensions and distances of paved roads	The Applicant has not identified discrepancies regarding the proposed paved distance at road connections. It is understood that the discrepancy noted in relation to paved surfacing details to the extent of asphalt paved surface at bellmouth locations where the aggregate haul road adjoins the existing public highway. For clarity, it is proposed to extend the paved surface 35m from the public highway. Beyond this point, the surface of the haul road will consist of compacted aggregate material. This is considered an appropriate distance to reduce the risk of track-out onto the public highway, also noting the intended use of wheel wash facilities as specified in the Outline CEMP. The description of surfacing of haul roads varies between aggregate haul road and temporary track matting. The main haul road from Stone Gate to the main compound will consist of stone aggregate surfacing. For shorter sections of haul road for minor elements of works, temporary track matting is likely to be utilised. This will be confirmed and described in further detail within the final CEMP and based on the detailed design of the temporary works.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000019
(Included within EHO comments on Air Quality) *The report suggest no backup generators will be in place yet one is shown on the plans.*	Clarification on backup generators	The Applicant confirms that only one permanent back-up generator will be installed for the Operation & Maintenance phase. This is standard across all National Grid substation projects, to provide resilience in the event of a power cut. No generator would be in continuous operation and are included for resilience purposes only. The response above provides further detail in relation to the scoping out of detailed assessment within the Air Quality Assessment. From a construction perspective, the expectation is main compounds would operate on a mains power supply. Interim generators may be required at main compounds and also generators may be required at smaller satellite compounds. These generators would generally be powered using HVO and/or solar panels.	GWNC-WSP-SS50-XXXXXX-RPT-ES-000004
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"Firstly, it is noted that in April 2025, South Holland District Council issues a screening opinion for this development which concluded that the development is not Environmental Impact Assessment pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. However, in light of the recent notification of the works required to connect the proposed substation to the existing transmission system pursuant to Section 37 of the Electricity Act 1989, the County Council requests that the development is screened again to take into account these additional and associated proposals which for the purposes of the Environment Impact Assessment Regulations should be screened as a single project. At the time the existing screening opinion was undertaken these associated works were not known and therefore could not be taken into account. It is the County Council's contention that due to these associated works it is necessary for the whole project to be screened to assess the entire project and not just elements of it. Recent case law such as Renshaw Farms Ltd v Scottish Ministers [2026] CSIH10 established that it is necessary for the whole project to be assessed to determine if it is Environmental Impact Assessment development or not. The wider project certainly includes those proposed works pursuant to Section 37 of the Electricity Act 1989, and the additional works to the existing overhead lines which are proposed to be undertaken as permitted development. Indeed, it could also be argued that this	Screening Opinion	The Applicant considers that full extent of the "project" for Environmental Impact Assessment (EIA) purposes was taken into account by SHDC at the screening stage. The EIA Screening Request submitted to SHDC on 10th April 2025 was based upon the supporting Figure 1 Screening Boundary. This Screening Boundary was based upon a conservative estimate of the maximum extent of land required to construct and operate the Scheme in its entirety. This included the Substation Works, the S37 Overhead Line Works and the extent of the reconductoring works of the existing 4ZM overhead line, which are illustrated on the Figure 1 Screening Boundary. Within the EIA Screening Request the 'Location of the Proposed Development' identified the land within the Screening Boundary required for the Proposed Development of new sections of 400kV overhead line and modification works to the existing 4ZM and 2WS overhead lines. Similarly, the EIA Screening Request included a description of the 'Characteristics of the Proposed Development', inclusive of 'Overhead Line Works' which described those works which are the subject of the recent applications to the Secretary of State for S37 Consent. Therefore, all of the works identified by LCC were known about and taken into account during screening. Relevant case law, including Wingfield v Canterbury City Council, Ashchurch Rural Parish Council v Tewkesbury Borough Council and Together Against Sizewell C Ltd v Secretary of State, confirms that project definition is a matter of planning judgment and that common ownership, geographic proximity or a shared strategic objective do not, in themselves, require separate developments to be treated as a single project. The Scheme is subject to separate, lawful consenting regimes, has a distinct purpose, and is capable of being promoted, consented and assessed independently, while the DCO is an NSIP with its own planning and environmental assessment process. Any potential interaction between these developments can be appropriately considered through cumulative assessment where relevant and does not necessitate their treatment as a single project for the purposes of EIA screening.	

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development is connected to the Grimsby to Walpole overhead lines project and should also be assessed as a single project."		It is also noted that given the inclusion of overhead line works requiring S37 consent within the Scheme, in addition to the EIA Screening Opinion provided by SHDC, a Screening Decision is also required from the SoS in accordance with The Electricity Works (EIA) (England and Wales) Regulations 2017. This has been requested as part of the S37 consent applications relating to modification of the existing 2WS and 4ZM overhead lines.	
"The proposal's red line boundary, including the substation works, is located in an area of Prehistoric and Medieval archaeological potential as acknowledged in the Environmental Summary Report - Chapter 5.5 Historic Environment. Any groundworks associated with the development are therefore likely to result in the harm or loss of surviving archaeological remains if present." *"Currently there is insufficient specific information on the archaeological potential for the site and the extent of impact to buried archaeological remains from the proposed development. Therefore, it is recommend the Applicant provides the results of a Heritage Impact Assessment of the proposed permanent substation including any connections. This is in line with the guidance set out in the NPPF (Paragraphs 207 & 218) and the South East Lincolnshire Local Plan (Policy 29). The Applicant has not adequately described the significance of any underground heritage assets that may be affected by the proposed development, and it is not "sufficient to understand the potential impact of the proposal on their significance (the heritage assets)" (NPPF Paragraph 207). This in turn does not allow the Local Planning Authority to "identify and assess the particular significance of any heritage asset that may be affected by a proposal." (NPPF Paragraph 208).* *Given the high archaeological potential, the Council requests that the determination of the application is paused until a Heritage Impact Assessment informed by Geophysics Survey, Geoarchaeological Assessment and Trial Trench Archaeological Evaluation has been completed, submitted and consulted on in order to properly assess the site's significance, inform appropriate archaeological planning advice, and design a suitable mitigation strategy 2 should consent be granted. Without this Heritage Impact Assessment being available the only option is to refuse the application."*	Historic Environment	Please see response below to LCC's archaeology comments (Page 43).	GWNC-ARU-SS50-XXXXXX-RPT-ES-000017
"That although the Definitive Map and Statement proves the existence of any recorded rights of way, there may be further or higher rights that are not shown on this document that the County Council is not currently aware of. This would be especially relevant where the public has had informal access to the site or where there are references to routes across this in maps or other historic documents. As the County Council has received no application to recognise further rights of way affecting the site, no more informed guidance can be offered at this stage. *Having given due regard to the appropriate local and national planning policy guidance (in particular the NPPF), Lincolnshire County Council (as Highway Authority and Lead Local Flood Authority) has concluded that the proposed development would not be expected to have an unacceptable impact upon highway safety or a severe residual cumulative impact upon the local highway network or increase surface water flood risk and therefore from a*	Highways	Based on the design strategy and assumption, we can confirm that the proposed highway interventions (in a form of road widening) at Stone Gate will be designed and constructed to a permanent asset standard in accordance with Design Manual for Roads and Bridges (DMRB), or otherwise as per the design standard being adopted by the Local Highway Authority. If all the proposed highway interventions and associated drainage system are to be reinstated back to preexisting condition, we do not anticipate any residual adverse impact on public road network. However, if the Local Highway or Planning Authority has intention to retain and adopt the road widenings post completion of project, there will be implications on the associated surface water drainage system and land issue. The TCPA has considered and included both highway and thirdparty lands to accommodate a surface water drainage solution during construction. Therefore, there is a potential risk of insufficient highway land to accommodate a robust surface water drainage solution, which purposely addresses the increase of impermeable catchment area as a result from the permanent road widening. We would like to seek further clarifications on the following two statements, both stated in the third paragraph of Transport section under the Highway Authority section within (a) Planning Conditions and Informatives on Page 3 of LCC response.	

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Highway Authority standpoint does not wish to object to the application."		*"…provide longer benefits for users of Stone Gate and less inconvenience than if the widening is removed after construction." ; and* *"…the widening is permanent."* These statements appear to suggest that LCC may have an intention to retain and adopt the proposed widening following completion of the project. We would be grateful if LCC could confirm whether this interpretation is correct, as this would have implications for the design approach, drainage strategy, land requirements, and future asset responsibility. We welcome the opportunity for further engagement to discuss the proposal and address any outstanding matters. We look forward to continuing a constructive dialogue to ensure an appropriate and mutually acceptable solution is developed.	
"The Flood Risk Assessment and Surface Water Drainage Strategy (SWDS) adequately assess the impact of potential surface water flood risk and propose mitigation measures in accordance with SUDs principles. Appendix D of the SWDS shows the indicative layout proposed for the surface water drainage of the site. These measures are acceptable and would not increase surface water flood risk. The details of the SWDS are recommended to be required by condition."	Surface Water and Flood Risk	The South Holland IDB's planning comments are noted, including the observation that the Outline Surface Water Drainage Strategy contained inconsistent wording in relation to the proposed discharge rate and the request for reassurance that discharge would be restricted to QBar. The wording within the outline submission reflected an intention to restrict discharge to greenfield rates where practicable, while also acknowledging that the final discharge rate may be at a rate greater than QBar to limit the risk of blockage and may be influenced by the operational requirements of the proposed pumped system. As detailed design has progressed, the practicable pumped discharge approach has been reviewed against the applicable WMA/IDB policy criterion for surface water discharge (WMA Policy: Discharge of Surface Water). On that basis, the discharge strategy has been developed in accordance with the policy requirement of 2 l/s/ha or QBar, whichever is higher, rather than by direct reference to the calculated greenfield QBar rate alone. This principle is also supported by the National Standards for Sustainable Drainage Systems, which state that the peak allowable discharge rate from a development to surface waters or sewers for the 50% AEP event should be limited to the equivalent 50% AEP greenfield runoff rate, or 3 l/s/ha, whichever is greater. During consultation, LCC advised that confirmation from the IDB on the QBar rate should be sought and noted that, although a higher rate may be acceptable for the pumped system, this could have associated maintenance cost implications. This indicates that the consultation position recognised the potential for a pumped discharge rate above the calculated greenfield runoff rate, subject to agreement with the IDB. Restricting the final pumped discharge rate to the calculated greenfield runoff rate would materially increase the attenuation volume required and could significantly affect the basin size and wider drainage design to an extent which impinges on the practicability of other elements of the scheme. In this context, and given that the proposed discharge approach remains aligned with the WMA Policy, the Applicant is agrees, in principle, to a condition and will discuss the matter with the Case Officer prior to the determination of the application. Final discharge rates and volumes will be confirmed through detailed design and will remain subject to separate Land Drainage Consent from the Board under Byelaw 3. Detailed design information will be shared with the IDB for review in due course.	GWNC-WSP-SS50-XXXXXX-RPT-ES-000001
"The site scheme area extends to 19.7ha of land, comprising: the substation and associated access; three pylon towers; and two ecological mitigation areas, which whilst they will not affect soil resources, one will have an impact on local agricultural production. There is additional land temporarily required for access and temporary compounds. *The temporary land take involves 111.21ha of Grade 1 and 3.31ha of non-agricultural land, and the permanent land take is 19.69ha of Grade 1 land. The mitigation areas affect a further 35.3ha of Grade 1 land.* *The soils report supporting the application estimates that the 19.69ha to be used permanently, all of which is ALC Grade 1 land, represents 0.03 % of the land classified as Provisional Grade 1*	BMV Land	The Applicant acknowledges the comments and is in agreement that the significance of this development is minor in terms of effects upon Best and Most Versatile (BMV) agricultural land.	GWNC-ARC-SS50-XXXXXX-RPT-ES-000002

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land, and 0.004 % of land classified as Best and Most Versatile (Grades 1, 2 and 3), in Lincolnshire. These figures are likely underestimates, based on back calculation. *Cumulatively, in terms of BMV and all of the agricultural land being taken by green energy and solar developments in the County, the significance of this development is minor."*			
"The Council's Landscape Consultants AAH have undertaken a review of the documents submitted in relation to landscape and visual impact. A full copy of AAH's response is attached but a summary of the comments are set out below. *The LVA and supporting figures and appendices provide a generally proportionate and well structured appraisal of landscape and visual effects associated with the proposed development. The methodology is broadly consistent with GLVIA3 and relevant Landscape Institute guidance. The assessment appears to have been undertaken by suitably qualified practitioners, but this should be explicitly stated.* *The separation of landscape and visual baseline conditions and effects is clear, and the supporting visualisation material is generally appropriate for an appraisal-level assessment, although some outputs would benefit from higher-resolution or more detailed photomontage formats to better resolve the extent of the proposed built form within the wider landscape context. The ZTV mapping needs to read more clearly as the purple lines dominate and make it hard to read the underlying basemap, and it needs to state the heights of the proposed gantries and towers.* *The appraisal identifies a predominantly open and visually exposed fenland landscape with existing influences from overhead transmission infrastructure, drainage networks and agricultural activity.* *The Council is broadly in agreement with the baseline characterisation and the identified receptor sensitivity, which appropriately reflects the limited vegetation structure and long range visibility typical of the study area. The development would introduce a substantial new substation complex into this context, resulting in localised but permanent alteration to landscape character. While the siting adjacent to existing 400kV infrastructure is a logical design response, the appraisal places significant reliance on this context when determining effects. Nonetheless, some residual adverse landscape effects are considered to remain at both construction and operation phases, particularly given the scale and permanence of the proposed infrastructure within an otherwise open landscape.* *In visual terms, the most notable effects are appropriately identified for receptors in closest proximity to the site, particularly users of PRoW and properties within Weston, including Crowtree Cottages, where open views and reduced intervening vegetation result in higher sensitivity to change.* *Elsewhere, effects are more limited and often experienced in the context of existing transmission infrastructure and agricultural land uses, which reduces the perceived contrast of the development within wider views. Mitigation planting is likely to assist in filtering*	Landscape and Visual	Regarding the ZTV, an updated figure (LVIA, Figure 7) has been prepared to make the base mapping more legible. As stated in the Planning, Design and Access Statement, the substation gantries would be a maximum height of 15 m. The seven newly proposed pylons are the subject of separate Section 37 Applications, for completeness their heights range from 49.3 m to 58.3 m. Please refer to the pylon schedules of these respective applications for further information. As set out previously on page 11, a Cumulative Effects Assessment Report was submitted in support of the Planning Application based upon pre-application engagement with SHDC. This has specifically considered potential cumulative effects due to the impacts of the Scheme acting in-combination with those of the ODOW project. The Cumulative Effects Assessment considered the Scheme in its entirety alongside a long list of other committed developments within a maximum radius of 20 km (depending on development category) of the Scheme. 19 other existing and/or approved developments were included in the Cumulative Effects Assessment short-list, informed by best practice assessment guidelines. The potential cumulative effects of the Scheme, when considered in combination with these 19 short-listed developments, was then assessed in further detail. The Outer Dowsing Offshore Wind project was included within the shortlist (see Table 5.1 of the Cumulative Effects Assessment) and potential cumulative effects were assessed in Section 5 by each environmental topic in turn. Potential cumulative landscape and visual effects are discussed in Section 5.8. In accordance with best practice assessment guidelines, an assessment of cumulative effects can only reasonably be undertaken with information publicly available at the time of writing. It is for emerging or less defined projects to conduct their own respective cumulative effects assessments which consider the Scheme as a 'other existing and, or approved development'. It is considered the Cumulative Effects Assessment prepared for the Planning Application has assessed the potential for cumulative effects to arise as a result of the Scheme and other existing and, or approved developments in the vicinity which are sufficiently mature, including the ODOW project. Therefore, the CEA does include an assessment of the cumulative effects of the ODOW project.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000020

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and softening views over time but is not expected to fully screen the development, with elements of the substation remaining visible in longer-term views. *Cumulatively, whilst the separate Cumulative Effects Assessment identifies no likely significant additional effects when considered alongside other major energy infrastructure projects, this conclusion is partly dependent on the selection of schemes at a sufficiently advanced stage of design to allow inclusion. This introduces an inherent limitation in that emerging or less defined projects, which may nonetheless contribute to cumulative landscape and visual effects within the wider study area, are not fully captured within the assessment. It is considered that the Outer Dowsing DCO should have been included as the consent was granted in February 2026 and therefore there is no justification not to include this scheme in the assessment. Prior to the application being determined it is recommended that the Cumulative Effects Assessment is updated to reflect the current known and permitted schemes in the area in order that a sufficiently detailed Cumulative Effects Assessments is considered as this is currently insufficient.* *Overall, whilst the appraisal conclusions are broadly supported, the development would result in localised but permanent adverse landscape and visual effects, reflecting the introduction of large-scale electrical infrastructure within an open and sensitive fenland landscape, with effects moderated but not eliminated by mitigation and existing infrastructure context. However, without the full consideration of cumulative effects it is not considered that all the necessary information has been provided and therefore the Council objects to the landscape and visual impacts of the development due to this lack of information."*			
"The Applicant has submitted an Ecological Impact Assessment dated May 2026 in support of the application. The report states that the majority of the site currently consists of arable fields with areas of sealed surface, small areas of grassland and scattered trees with occasional hedgerows and watercourses present across the site. *The Applicant has undertaken a data search with the Lincolnshire Environmental Records Centre which shows that there are a series of internationally, nationally and locally important wildlife sites in the vicinity of the proposed development site. Appropriate search areas have been identified based on the level of importance and their interest features.* *Given the potential for impacts on The Wash SPA/Ramsar and The Wash and North Norfolk Coast SAC and their features, a Habitats Regulations Assessment will be required. The report concludes that there will be no adverse effects on nationally designated sites due to the distance from the proposed development site and the lack of any hydrological connection. Potential impacts on locally designated sites were identified, and appropriate mitigation measures are included in an Outline Construction Environmental Management Plan (OCEMP). The CEMP should be secured in a planning condition."* *"The Applicant is also proposing to deliver areas of compensatory habitat for farmland birds. This approach is welcomed and will help to avoid impacts on this group of species. The Applicant proposes*	Ecology	It is acknowledged that some protected species surveys were outstanding at the time of submission. The Applicant has updated the Aquatic Survey Report and Great Crested Newt Survey following the completion of surveys and these are attached in support of this response. Additionally, an updated copy of the Otter and Water Vole Survey Report will be provided to SHDC in August. Bat surveys are due to be completed in August 2026 and the Applicant intends to provide an updated copy of the Bat Survey Report to SHDC by the end of August 2026. An Outline CEMP was submitted in support of the Planning Application, which aims to ensure that any potential adverse effects upon the environment during construction would be minimised as far as reasonably practicable. It is intended for the CEMP to be a 'live document' and will be updated as and when there are changes to the project team or where additional information becomes available. The Outline CEMP provides the basis of a final CEMP, which would be prepared and agreed with the relevant consenting authorities in advance of the start of construction. Contained within are best practice measures including but not limited to limiting any potential adverse effects caused by construction noise and lighting. With respect to the Indicative LEMP, the Applicant can confirm that the preferred option to take forward to detailed design is the provision of an area of permanent set-aside, which is consistent with the LCC recommendation. The updated survey results do not change the conclusions of the EcIA submitted in support of the Planning Application. Following the implementation of embedded mitigation and control measures outlined within the Indicative LEMP and the Outline CEMP, no significant residual effects resulting are predicted during either construction or operation of the Proposed Development.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000006 GWNC-ARU-SS50-XXXXXX-RPT-ES-000012 GWNC-ARU-SS50-XXXXXX-RPT-ES-000011 GWNC-ARU-SS50-XXXXXX-RPT-ES-000008 GWNC-ARU-SS50-XXXXXX-RPT-ES-000019 GWNC-GIL-SS50-XXXXXX-PLN-ES-000001 GWNC-ARU-SS50-XXXXXX-RPT-ES-000005

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establishing an area of spring cereals or an area of organic set-aside / grassland. The Council advises that if spring cereals are to be used, 'skylark plots' should be established within the crops to ensure maximum efficacy. However, permanent grassland habitats are likely to support a wider range of species and are also likely to provide a greater contribution to the delivery of BNG, see comments below. - *Non-breeding birds: non-breeding bird surveys were undertaken between 2022 and 2025. Mitigation measures in relation to disturbance are included in the CEMP and compensatory habitat delivered for breeding farmland birds is also likely to be beneficial for non-breeding birds."*			
"The application was received after 12 February 2024 and the general Biodiversity Gain condition therefore applies. *The Applicant has submitted a completed Statutory BNG metric including both baseline and target habitats and a Biodiversity Net Gain report. For this application the Applicant proposes to create areas of woodland and grassland on-site and to plant 16 individual trees which will contribute to the delivery of gains in area habitat. New native hedgerow planting is proposed as well as works to realign and enhance on-site ditches which will contribute to gains in linear habitats. Details of seed mixes to be used and tree / shrub species to be planted have not been provided but will need to be included in a detailed Habitat Management and Monitoring Plan (HMMP).* *The Statutory BNG metric submitted in support of the application calculates that there will be a net loss of 19% of area habitat biodiversity units, a net gain of 98.08% of hedgerow habitat units and a net loss of 11.27% watercourse units based on the current development plans. A minimum of 10% gain in all habitat types is required. Based on the current proposals there will therefore be a shortfall of 52.42 area habitat biodiversity units and 4.53 watercourse biodiversity units.* *The Applicant will need to demonstrate how this shortfall can be met by delivering additional enhancements either within the red line boundary or off-site on land registered with Natural England, by purchasing units from a habitat bank or as a last resort by purchasing Statutory Biodiversity Credits. There will also be a requirement to demonstrate that the Statutory Biodiversity Metric Trading rules are met.* *The Council is of the opinion that additional gains in area habitats could potentially be delivered on-site for instance by establishing areas of species rich grassland instead of retained arable habitats in some areas. This would allow additional gains to be delivered on-site whilst also delivering mitigation for ground nesting birds. The Applicant should therefore confirm that all opportunities to deliver BNG on-site have been exhausted before seeking to deliver off-site as required by the biodiversity gain hierarchy.* *The delivery and management of BNG will need to be secured for a minimum of 30 years. This will require the Applicant to submit a Biodiversity Gain Plan to the Local Planning Authority.*	BNG	Due to the current and future connections and operational requirements at the new Weston Marsh Substation A, it is not possible to secure the entirety of the required biodiversity gains on-site as there remains uncertainty about whether such on-site habitat creation measures could be retained in-situ, unimpacted, for the required minimum of 30 years BNG management. Habitat creation measures contributing to on-site biodiversity net gains are therefore proposed in locations where they can be managed and maintained for at least 30 years, undisturbed by future development. In order to achieve the legally required 10% BNG for habitat and watercourse units, and meet the trading rules, off-site units are proposed to be purchased from a third-party provider via National Grids QUDM procurement framework route. The QUDM is a pre-vetted pool of capable third-party biodiversity unit providers that can be invited to bid for tender opportunities. Applications to enter the QUDM opened in June 2026; a large number of providers have since applied to join. The requirement to submit a Biodiversity Gain Plan and associated Habitat Management and Monitoring Plan (HMMP) post-consent is acknowledged. National Grid recognises that the Biodiversity Gain Plan must include details of any registered off-site biodiversity gain allocated to the development and secured via the QUDM. National Grid also recognises that the current draft version of the HMMP, that has been submitted as part of the application, will need to be finalised following the granting of planning permission. This final HMMP will need to detail the 30 year aftercare, management, monitoring and failure remediation measures, for all on-site biodiversity gains contributing to the overall BNG calculation for the project.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000015

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A HMMP for on-site habitats will also need to be submitted to the Local Planning Authority. This should include details of aftercare, management, monitoring, replacement of failures and provisions for reviewing and updating the HMMP."			
Lincolnshire County Council Archaeology			
"The submitted Historic Environment Desk-Based Assessment provides information partially in accordance with paragraph 207 of the NPPF. However, the submitted information remains insufficient to understand the significance of any buried archaeological remains that may be affected by the proposed development, or the potential impact of the proposal upon that significance. *The proposal red boundary including the substation works, are located in an area of Prehistoric, Roman, Medieval and Modern archaeological potential as acknowledged in the HEDBA. Any groundworks associated with the development (including but not limited to deep piling foundations) are therefore likely to result in the harm or loss of surviving archaeological remains if present. Also, the HEDBA acknowledges the limitations of the Geophysical Survey.* *The proposed development comprises "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."* *Recommendation: Currently there is insufficient specific information on the archaeological significance for the site and the extent of impact to buried archaeological remains from the proposed development. Therefore, I recommend the applicant to provide the results of a Heritage Impact Assessment informed by appropriate archaeological field evaluation of the proposed permanent substation including any connections. This is in line with the guidance set out in the NPPF 2024 (paragraphs 207 & 218) and the South East Lincolnshire Local Plan (Policy 29). The applicant has not adequately described the significance of any underground heritage assets that may be affected by the proposed development, and it is not "sufficient to understand the potential impact of the proposal on their significance ('the heritage assets')" (Paragraph 207 of the National Planning Policy Framework (NPPF)). This in turn does not allow the Local planning authority to "identify and assess the particular significance of any heritage asset that may be affected by a proposal." (Paragraph 208 NPPF).* *Given the identified archaeological potential, I recommend that this application be accompanied by a Heritage Impact Assessment informed by an additional Geophysics Survey, specific Geoarchaeological Assessment and full standard Trial Trench Archaeological Evaluation in order to properly assess the site's significance, inform appropriate archaeological planning advice, and design a suitable mitigation strategy should consent be granted."*	Significance of the Site	The historic environment desk-based assessment (HEDBA) submitted to support Planning Application H22-0466-26 was prepared in accordance with the South East Lincolnshire Plan Policy 29: The Historic Environment, Part C 2 and current CIFA guidance, using the information available at the time of the application. In doing so the desk-based assessment: • identified all known archaeological deposits and heritage assets within the application site and surrounding study area; • assessed the potential for previously unknown archaeological remains within the application site; • identified those heritage assets that may be affected by the Scheme, including those whose setting may be affected; • assessed the heritage significance of all known heritage asset that had potential to be impacted by the Scheme; and • taking into account the available evidence, assessed the likely impact of the Scheme on the significance of each heritage asset, clearly stating whether the likely impact would amount to substantial or less than substation harm, in accordance with the NPPF. The HEDBA considered the potential for previously unknown buried archaeological remains to survive within the application site, concluding that, based on the available evidence there was: • a medium potential for prehistoric remains, likely buried at depth beneath tidal flat deposits if present; • a low potential for Roman and early medieval remains, with a great potential towards the southern end of the application site; • a high potential for medieval and post-medieval remains associated with former sea defences, land drainage, field systems and agricultural features; and • a low potential for modern remains. The HEDBA assessed the significance of each heritage or archaeological asset identified as being potentially affected by the Substation Works, as required by paragraph 208 the NPPF. The assessment took into account the type, date, rarity, character and state of preservation of the heritage assets articulated through their heritage interest (archaeological, historic, architectural and artistic interest) as defined by the NPPF. The HEDBA assessed the individual archaeological assets as being of local or regional significance. No archaeological assets were assessed as being of national significance or of being of demonstrably equivalent significance to a scheduled monument.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000017
	Buried Remains	The HEDBA collated baseline data including, but not limited to: • records held by the Lincolnshire Historic Environment Record (as required by the NPPF 2025, para. 207);	GWNC-ARU-SS50-XXXXXX-RPT-ES-000017

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		• the results of aerial photographic and LiDAR assessment; • the results of historic map evidence; • the results of geophysical survey completed within accessible areas of the site; • records held by the Portable Antiquities Scheme; and • documentary sources. The HEDBA identified a range of evidence for known and previously unknown buried archaeological and earthwork remains in the form of crop and soil marks, archaeological anomalies identified by geophysical survey, findspots and the results of geoarchaeological monitoring of ground investigations within the site. Archaeological assets included the buried remains of buried peat deposits, located at approximately 13.5 to 14.0 m below the current ground surface, medieval sea defences, ridge and furrow cultivation and dyling field systems, post-medieval sea defences, a trackway, ditches and former field boundaries, several former ponds and undated ditches. The buried archaeological remains identified reflect the location of the application site within the Wash Basin, within the Weston Marsh Substation A Site and land north of Stone Gate, forming part of the low lying, intertidal mudflats and marsh, until reclamation efforts improved the land for agriculture from the late medieval period onwards. Eighteen archaeological assets were identified as potentially being affected by the Substation Works with the potential loss, disturbance and harm to the significance of each asset being assessed within Section 6 of the HEDBA.	
	Additional Surveys	The limitations of the field evaluation undertaken to date, owing to access, ecological and crop constraints, are acknowledged by the Applicant within the HEDBA, which presented all available information to support the Planning Application. This included identifying buried heritage assets through desk-based research, aerial photographic and LiDAR analysis and geophysical survey of all land parcels available during preparation of the Planning Application. The main concern raised relates to understanding the risk of encountering previously unknown archaeological remains within the application site and understanding their heritage significance. To address the limitations of the archaeological surveys undertaken to date, the Applicant has continued to make efforts to programme geophysical survey within those areas not already surveyed, including the construction access haul road extending across the fields to the south of the proposed Weston Marsh Substation A Site and the proposed construction compound on Stone Gate. Geophysical surveys completed to date provide coverage of the majority of the proposed Weston Marsh Substation A Site, adjacent temporary construction compounds and associate land east of the proposed Weston Marsh Substation A Site required for drainage, environmental mitigation and access. The Applicant is also mindful that the requirement for surveys for the proposed Weston Marsh Substation A and the Grimsby to Walpole DCO project may place pressures on landowners. In acknowledgement of this, and to be able to undertake trial trench evaluation of those areas of the proposed Weston Marsh Substation A in which geophysical survey has already been progressed, the design of trial trench evaluation has already been undertaken and included in a wider programme of trial trench evaluation planned to follow harvest this year. It should be noted that the process required to gain access to land to undertake intrusive surveys, such as trial trench evaluation, can take up to 12 weeks. Given the current crop constraints and land access requirements for the application site, it is almost certain that it will not be possible to complete the recommended programme of outstanding geophysical survey, geoarchaeological assessment and trial trench evaluation, within the determination period for the application for the new Weston Marsh Substation A. In order to progress determination of the Planning Application and to enable the completion of the recommended archaeological evaluation, the trial trench evaluation and geoarchaeological assessment could, as is often the case, be secured by condition, with the Applicant working with the LCC Historic Places Team, as archaeological advisors to SHDC, to agree the scope and specification of the works, to achieve this.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000017

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		A possible timeline for the completion of the remaining surveys may be: • August 2026 - review the proposed trial trench evaluation within areas in which geophysical survey has been completed with the LCC Historic Places Team. • August 2026 - agree a suitable programme of geoarchaeological borehole survey and assessment with the LCC Historic Places Team, to further inform the geoarchaeological potential of the application site and any further mitigation measures that may be required, where appropriate. • August – prepare an outline Written Scheme of Investigation for combined trial trench evaluation and geoarchaeological borehole assessment, in consultation with the LCC Historic Places Team, for approval by SHDC. • August/September 2026 – where possible, complete the geophysical survey for those areas not already surveyed, following the harvest of crops currently on the fields; • September 2026 – earliest opportunity to undertake trial trench evaluation of those fields in which geophysical survey has already been completed (due to crop constraints). • Late September 2026 - review the results of the additional geophysical survey, in consultation with the LCC Historic Places Team, and finalise the written scheme of investigation for trial trench evaluation in those areas where geophysical survey has not been completed to date. • October 2026 - earliest opportunity to undertake the remaining trial trench evaluation and geoarchaeological borehole assessment within areas not previously subject to geophysical survey. • December 2026/January 2027 – earliest likely date at which the trial trenching and geoarchaeological assessment reports are available for review with the LCC Historic Places Team. • Early 2027 – development of an appropriate programme of archaeological mitigation measures for the proposed Weston Marsh Substation A, in consultation with the LCC Historic Places Team and SHDC. An alternative approach using trial trench evaluation without the benefit of geophysical survey, using a 5%, plus 1% contingency trenching sample, as suggested in the Lincolnshire Archaeological Handbook, has been agreed in principle with the LCC Historic Places Team (email correspondence dated 14.07.26) should it be needed. However, securing land access and harvest dates would still be the determining factors in being able to undertake the trial trench evaluation work.	
Lincolnshire Fire and Rescue			
"Access to buildings for fire appliances and fire fighters must meet with the requirements specified in the Building Regulations (as amended) Part B5. These requirements may be satisfied with other equivalent standards relating to access for firefighting, in which case those standards should be quoted in correspondence. *Lincolnshire Fire and Rescue require a minimum carrying capacity for hard standing for pumping appliances of 18 tonnes, not 12.5 tonnes as detailed in the Building Regulations (as amended) Part B5. This weight limit would also apply to any private/shared access roads in order to achieve the above item."*	Access	Following a consultation meeting with Lincolnshire Fire & Rescue on Wednesday 8th July, it was reconfirmed that access routes and hardstanding areas should be capable of accommodating fire appliances with a gross vehicle weight of up to 26 tonnes. We can confirm that the access roads serving the substation will be designed to support vehicles carrying loads in excess of 26 tonnes and will therefore provide suitable access for fire appliances in accordance with Lincolnshire Fire & Rescue requirements.	
"Lincolnshire Fire and Rescue recommends that fire hydrants are installed in sufficient number and location at the developer's expense, as follows, otherwise we would object to this development: Fire Hydrant Placement Regulations: The Building Regulations require that there must be a fire hydrant located within 90 metres of any building so that firefighters have access to a water source in case of a fire. *Please confirm sizes in m2 for all proposed buildings, including the control and amenities building, DNO substation, storeroom, dispersed relay room, storeroom and workshop & pumping station."*	Water Supply	Whilst we acknowledge the requirement for hydrants received from Lincolnshire Fire & Rescue service to align with life safety requirements as listed within Approved Document B, due to the remoteness of the site and the uncertainty of sufficient flows and pressures from closest water mains, it has been discussed and agreed between WSP and Lincolnshire Fire & Rescue that an alternative water source would be accepted (online meeting Wednesday 8th July 2026 – Nicholas Morris). To align with building regulation life safety requirements, the minimum fire water storage tank capacity required to sites that do not contain oil-filled plant is 45,000 litres, sites which do contain oil-filled plant will contain 120,000 litres of dedicated fire water storage to align with National Grid specifications.	

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		Please see below sizes (m²) for all proposed buildings: • Control & Amenities Building – 1,111 m² • Store & Workshop Building – 120 m² • General Store, Earthing & Demarcation Store – 250 m² • Dispersed Relay Room – 30.6 m² • DNO Kiosk/Substation – 8.9 m² • Pumping Station – 96 m² • Diesel Generator – 17.2 m²	
Lincolnshire Wildlife Trust			
"We would have preferred to see this development included as part of the Development Consent Order (DCO) application for the wider Weston Marsh to East Leicestershire Nationally Significant Infrastructure Project (NSIP), but we understand the need for the substation to support the Outer Dowsing project which has already been granted a DCO. The application, and the detail of information required, should therefore be considered within the context of the wider NSIP development."	Separate Application	The proposed Weston Marsh Substation A is a standalone development required to facilitate the connection of the consented ODOW connection by 2030. This requirement arises from an existing connection agreement and cannot be met through the programme for the Grimsby to Walpole DCO project, which has a later anticipated consent and construction timetable. The Scheme therefore has a distinct and time-critical purpose, and can be constructed, commissioned and operated independently of the Grimsby to Walpole project. Whilst the Scheme ultimately forms part of a broader strategic network of infrastructure in the area, this does not alter the need for the current application to be progressed through the appropriate statutory consenting regimes. The consenting approach therefore reflects the legislative framework applicable to the development. Notwithstanding this, the supporting assessments have considered the wider strategic context of the Scheme. The application is supported by cumulative and environmental assessments that consider interactions with other committed and emerging infrastructure projects, including Grimsby to Walpole, WMEL, Meridian Solar Farm and ODOW. The decision-maker is therefore able to assess both the standalone merits of the Scheme and its relationship with the programme of transmission reinforcement planned for the region based upon currently available information.	
"Several protected species surveys are still to be completed within the coming months, such as vole and otter surveys of watercourse that were awaiting access permission, ground level tree assessment (GLTA) to assess bat roosting potential, and a habitat suitability assessment (HSI) of several ponds. Paragraph 99 of ODPM Circular 06/2005 : Biodiversity and Geological Conservation – Statutory Obligations and Their Impact Within the Planning System states that: "It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted. However, bearing in mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by the development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and/or planning obligations, before the permission is granted. In appropriate circumstances the permission may also impose a condition preventing the development from proceeding	Protected Species	As previously acknowledged, some protected species surveys were outstanding at the time of submission. The Applicant has updated the Aquatic Survey Report and Great Crested Newt Survey following the completion of surveys and these are attached in support of this response. Additionally, otter and water vole surveys are now complete where landowner access has been secured, and an updated copy of the Otter and Water Vole Survey Report will be provided to SHDC by the week commencing 10th August. The Applicant has been unable to access Pond P947, however, this is not considered to be significant due to the distance (250 m) and nature (i.e. no loss of vegetation) of the proposed works at this location. In addition, the Applicant has been unable to access watercourse GtW-ARP-RIPWC-744, this is also not considered to be significant. This is because GtW-ARP-RIPWC-744 is a continuation of GtW-ARP-RIPWC-46 which was assessed as unsuitable for water voles. Surrounding watercourses that were able to be accessed were dry and the time of visit and unsuitable for water voles. It is therefore considered unlikely that water voles are utilising the unsurveyed watercourse. Bat surveys are due to be completed in August 2026, and the Applicant intends to provide an updated copy of the Bat Survey Report to SHDC by the end of August 2026. The updated survey results do not change the conclusions of the EcIA submitted in support of the Planning Application. Following the implementation of embedded mitigation and control measures outlined within the Indicative LEMP and the Outline CEMP, no significant residual effects resulting are predicted during either construction or operation of the Proposed Development. Notwithstanding this, an updated EcIA will also be provided to SHDC for completeness alongside the updated Bat Survey Report.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000006 GWNC-ARU-SS50-XXXXXX-RPT-ES-000012 GWNC-ARU-SS50-XXXXXX-RPT-ES-000011 GWNC-ARU-SS50-XXXXXX-RPT-ES-000008 GWNC-ARU-SS50-XXXXXX-RPT-ES-000019 GWNC-GIL-SS50-XXXXXX-PLN-ES-000001 GWNC-ARU-SS50-XXXXXX-RPT-ES-000005

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without the prior acquisition of a licence under the procedure set out in section C below." This illustrates that protected species surveys need to be completed before planning permission is granted."			
"Skylark mitigation has been proposed, with the Environmental Impact Assessment (EIA) stating that two skylark territories were identified within the works boundary during surveys, which will be offset by compensatory habitat. However, the table in Appendix A Breeding bird survey results 2024 – 2025, within the Breeding Bird Survey Report, states that eight skylark territories were observed in both the 2024 and 2025 surveys. Clarification is required on the number of skylark territories on site, and further details of how the mitigation area will offset the losses."	Skylark Mitigation	The bird report identifies eight skylark territories (in both years) potentially breeding within the Scheme Site Boundary, which includes all components of the Scheme (Substation Works Site Boundary (TCPA), S37 4ZM Overhead Line Works, S37 2WS Overhead Line Works, Exempt Overhead Line Works). The Substation Works Site Boundary (+50m buffer) contained two skylark territories in both years. The compensation area provided to offset the permanent loss of two skylark territories will be enhanced in habitat quality to increase the carrying capacity for skylark. This habitat enhancement is based upon published methods in CIEEM. The other skylark territories in the wider Scheme Site Boundary are not to be permanently lost through construction. As previously noted, the Applicant can confirm that the preferred option to take forward to detailed design with respect to compensatory habitat, is the provision of an area of permanent set-aside within the area shown on the Indicative LEMP. (CIEEM, 2022. InPractice: Bulletin of the Chartered Institute of Ecology and Environmental Management. Issue 117, September 2022, pp 47 – 51.).	GWNC-ARU-SS50-XXXXXX-RPT-ES-000009 GWNC-GIL-SS50-XXXXXX-PLN-ES-000001
"The Design and Access Statement asserts that "The Substation Works would require 7 no. temporary watercourse crossings (including drains and ditches)." However, crossings are not mentioned in the Otter and Water Vole Survey Report, and the Habitats Regulations Assessment Stage 1 Screening Report states that "the Scheme will not deliver any temporary watercourse crossings to facilitate the movement of construction plant, equipment and personnel throughout construction areas." We would like some clarification on the locations of the watercourse crossings, and how these may impact otter and water vole. In addition to this, we request that the proposed watercourse diversion is designed with nature in mind. The Indicative Landscape & Ecological Mitigation Proposals show that Emorsgate EG1 - General Purpose Meadow Grass Mixture or similar will be used for the grassland alongside the new watercourse. However, a riparian seed mix of local provenance should be used, and we would be happy to advise on the best way to create this and other habitats in a way that is most beneficial to local wildlife"	Inconsistencies between submitted documentation	The Applicant can confirm that 11 temporary watercourse crossings are required in total to facilitate the construction of the Scheme. This has been further broken down into the crossings required for each consenting boundary, noting some crossings serve more than one element of the Scheme: • Substation Works: eight temporary watercourse crossings; • 4ZM Overhead Line Works: four temporary watercourse crossings; • 2WS Overhead Line Works: five temporary watercourse crossings; and • Exempt Overhead Line Works: four temporary watercourse crossings. The inconsistencies raised by the Lincolnshire Wildlife Trust have been addressed through updates to the Planning, Design and Access Statement and the Habitats Regulations Assessment Stage 1 Screening Report. The Otter and Water Vole Survey Report presented the factual results of the otter and water vole surveys undertaken for the Scheme. It does not include the impact assessment of these protected species, that assessment is instead provided in the EcIA. The EcIA has assessed the impact of temporary watercourse crossings on designated sites and protected species, where relevant.	GWNC-ARU-SS50-XXXXXX-RPT-CP-0000002 GWNC-ARU-SS50-XXXXXX-RPT-ES-000014 GWNC-ARU-SS50-XXXXXX-RPT-ES-000012 GWNC-ARU-SS50-XXXXXX-RPT-ES-000005
	Proposed Watercourse Diversion	The comment is noted. The Applicant is engaged in ongoing discussions with the South Holland IDB on the watercourse diversion required to deliver the Scheme and the detailed design will be subject to agreement with the IDB as the responsible management authority for the diverted asset.	
"The Biodiversity Net Gain (BNG) Metric shows a high strategic significance multiplier applied to the created woodland habitat, however the site is not within a mapped area for a woodland-associated action of the draft Local Nature Recovery Strategy (LNRS) for Greater Lincolnshire. The Biodiversity Metric User Guide, in reference to high strategic significance, states that: "This category can only be applied to post development interventions when: *- The location of the habitat parcel has been mapped in the Local Habitat Map as an area where a potential measure has been proposed to help deliver the priorities of that LNRS; and*	BNG Metric	It is acknowledged that the draft Local Nature Recovery Strategy (LNRS) for Greater Lincolnshire has been incorrectly interpreted in how strategic significance has been applied to woodland creation within the BNG Metric for the Project. This has been corrected and the metric and BNG Report updated and re-issued to correct this error. National Grid will continue to engage with Green Investment in Greater Lincolnshire (GIGL), and other third-party providers of off-site Biodiversity Units, via QUDM to secure the unit requirement for the project. As part of their qualification onto the QUDM unit providers will need to demonstrate that biodiversity gain schemes will contribute to wider environmental and societal benefits, including environmental education, learning and skills.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000015

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- *The proposed intervention is consistent with the mapped potential measure in the LNRS for the habitat parcel".* *The created woodland habitat should therefore not have a strategic significance multiplier applied. We understand that it is not feasible to achieve a 10% BNG on site, however we would still like to see the project deliver for local biodiversity. Please continue to discuss with Green Investment in Greater Lincolnshire (GIGL) the best ways to achieve off-site BNG offsetting in a way that is most beneficial for wildlife within the local area."*			
Moulton Parish Council			
"The loss of valuable farmland"	Loss of Best and Most Versatile Land	In accordance with the submitted Planning Design and Access Statement, the applicant acknowledges that the Scheme will result in the permanent loss of 19.69 ha of Grade 1 best and most versatile agricultural land. This loss represents 0.03% of land classified as Provisional Grade 1 land in Lincolnshire. This calculation is based on the 75,757 ha of Provisional Grade 1 land in Lincolnshire as defined by MAFF (1983)[4]. All soils permanently disturbed would be reused on site where practicable, with all soil handling undertaken in line with published good practice as set out in the Outline Soil Management Plan. In addition, the Planning Policy Officer has commented on this application stating that the development cannot be located other than within the countryside. The substation has been located close to existing overhead line structures which converge at the Spalding Tee-Point, to reduce the need for additional new overhead line infrastructure. Were the substation located further from existing overhead lines, then a greater number of new pylons and additional length of new overhead line would be required to connect the substation to the existing network. This would result in greater impact upon BMV land that that associated with the Scheme. The preferred location of the Weston Marsh Substation A has been determined through extensive siting studies 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 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. Whilst the Applicant accepts that the Schemet would result in the loss of BMV land, significant weight should be given to the need of the development, BNG gain, landscaping, and national benefits as a result of the development that mitigate/outweigh the loss of a very small percentage of BMV land.	GWNC-ARU-SS50-XXXXXX-RPT-CP-000002 GWNC-ARC-SS50-XXXXXX-RPT-ES-000001 GWNC-ARC-SS50-XXXXXX-RPT-ES-000002
"Devaluation of nearby properties"	Devaluation of nearby properties	It is understandable to have concerns about property values regarding new infrastructure proposals near residential properties. We have sought to reduce potential effects on communities and residents through routeing and design. We have also sought to reduce concern or uncertainty through making timely design decisions and engaging with people throughout the development of the project. We understand that the visual impact of any new electricity infrastructure is likely to be a concern for local communities, and we take every measure possible to avoid communities and properties as much as possible. National Grid offers support through our dedicated lands team to all persons with an interest in land affected by the proposals.Changes in overall property values can be due to several different local, national and global factors affecting the housing market. These are constantly changing. It is difficult to single out any one	

[4] Agricultural Land Classification of England and Wales – The Distribution of the Grades; MAFF (1983) Technical note TN/RP/01 TFS 846

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		factor alone which could determine house prices. We do, however, recognise that the visual impact of any new overhead line is likely to be a significant concern for many local communities, so we always try to avoid communities and individual properties in balance with our other duties. These include the need to be economic and efficient and keep costs down in the interest of bill-paying customers.	
The impact on wildlife in the area"	Impact on Wildlife	Impacts on designated sites and protected species as a result of the Substation Works have been assessed in a detailed EcIA prepared for the Planning Application. The EcIA is supported by the following survey reports which together provide an extensive suite of relevant information: • Habitat Classification Survey Report; • Badger Survey Report; • Breeding Bird Survey Report; • Non-breeding Bird Survey Report; • Bat Survey Report; • Aquatic Survey Report; • Otter and Water Vole Survey Report; and • Great Crested Newt Survey Report. Based upon the mitigation measures illustrated on the Indicative Landscape and Ecological Mitigation Proposals and also set out within the Outline CEMP, significant effects upon habitats and protected and notable species in the area would be avoided. The Applicant will continue to engage with the relevant authorities, including SHDC, Natural England and the EA, to ensure that impacts upon wildlife are minimised as far as reasonably practicable. A 10% gain in biodiversity value would also be delivered through implementation of the Substation Works, in accordance with mandatory planning requirements, as discussed in detail within the Biodiversity Net Gain Report submitted in support of the Planning Application.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000005 GWNC-ARU-SS50-XXXXXX-RPT-ES-000013 GWNC-ARU-SS50-XXXXXX-RPT-ES-000007 GWNC-ARU-SS50-XXXXXX-RPT-ES-000009 GWNC-ARU-SS50-XXXXXX-RPT-ES-000010 GWNC-ARU-SS50-XXXXXX-RPT-ES-000008 GWNC-ARU-SS50-XXXXXX-RPT-ES-000006 GWNC-ARU-SS50-XXXXXX-RPT-ES-000012 GWNC-ARU-SS50-XXXXXX-RPT-ES-000011 GWNC-GIL-SS50-XXXXXX-PLN-ES-000001 GWNC-ARU-SS50-XXXXXX-RPT-ES-000019 GWNC-ARU-SS50-XXXXXX-RPT-ES-000015
"The extra traffic on roads during construction stages on roads that already are not suitable or stable enough. *If roads are to be improved beforehand, the extra congestion that traffic lights and road closures cause."*	Construction Traffic	A Transport Statement and Outline CTMP were submitted in support of the Planning Application. The Transport Statement provides an assessment of construction traffic resulting from the Scheme. Percentage impacts on the main road network due to construction traffic from the Scheme are forecast to be low. It is acknowledged that percentage differences on Marsh Road and Stone Gate are much higher due to the baseline flows on these links being low, but the overall number of construction traffic flows are modest and impact will be temporary. It is not considered, based on assessment which adopts best practice guidance, that this will result in severe impact on operation of the local highway network. Road widening is proposed on Stone Gate to make it suitable for HGV traffic, and a haul road is proposed mid way up Stone Gate which then takes any HGV traffic associated with the Scheme off the rest of Stone Gate and Marsh Road. Marsh Road and the section of Stone Gate north of the haul road would only be utilised by construction worker cars/vans. The Outline CTMP sets out the strategy and measures for managing construction traffic to be adopted by the Main Works Contractor. Sustainable modes of travel are encouraged where reasonable to reduce the impact of workforce travel on local residents and business and to reduce single occupancy car trips to site. A final CTMP will be adopted prior to construction of the Scheme, it is anticipated this would be pursuant to a planning condition and agreed with the local highway authority. As such, it is considered that any impacts from construction traffic resulting from the Scheme have been assessed and mitigated as far as reasonably practicable and significant disruption would be avoided. The applicant has and will continue to work closely with the local highway authority to minimise the impact on local communities. It is reminded that it is for the Local Planning Authority to have the final decision on the CTMP.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000018 GWNC-WSP-ZZZZ-ZZZZZZ-PLN-PM-000002
"Even though the substation is not in our parish as such, it would have an adverse effect on surrounding parishes greatly."	Impact on Surrounding Parishes	It is acknowledged a temporary minor adverse effect would be experienced by the Moultons community during construction and operation of the Scheme due to open views of the flat landscape and use of local road links and Public Rights of Way. A suite of environmental documentation has been prepared in support of the Planning Application informed by a screening process and pre-application engagement	GWNC-GIL-SS50-XXXXXX-RPT-ES-000001

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		with SHDC. The majority of effects as a result of the Scheme are predicted to be localised and not significant during construction and operation.	
MP – John Hayes			
"That these are to be built largely on Grade 1 land - the highest quality agricultural land - is extremely concerning and should be reason for refusal alone. As the National Grid consultation from 2025 makes clear, the project will result in the "permanent loss of 106.9 hectares of soil", an extraordinary amount of lost farmland. *Given that the South Holland area grows much of the food that is consumed across our country - 30% of the UK's vegetables, 20% of its sugar beet, and 20% of England's potatoes - taking so much highly fertile Best and Most Versatile (BMV) farmland out of food production, at a time when Government is focusing on boosting domestic production in aid of national resilience and to reduce high costs, is improper and shocking.* *Given the number of other potential locations that could have been chosen to avoid this destruction of vital agricultural land, it is extraordinary that these locations have been chosen. As the most productive land is so scarce - just 16% of land in England is grade 1 or 2 - it is surely reasonable to ask why infrastructure of this kind cannot be built on other land.* *Furthermore, this application flies in the face of Government policy which is clear that developers must have "consideration for ongoing food production" and commits to ensuring that "[the Government] safeguard, wherever possible, our key agricultural lands as part of our commitment on food security."* *The Secretary of State for Energy Security and Net Zero told the House of Commons on March 5th that "we operate under guidance from the last Government about avoiding the best available land where at all possible." Likewise, in responding to a Written Parliamentary question in January 2026 about the use of agricultural land for solar energy, the Minister of State for Energy said that "Our policy remains unchanged. Solar farms should be built on brownfield sites or previously developed land, wherever possible. Where the development of agricultural land is shown to be necessary, lower-quality land should be preferred to higher-quality land."* *As such, it is clear that BMV farmland must remain in production to ensure that food security is assured and that prices remain affordable. I therefore call on National Grid to look elsewhere to locate such large industrial structures."*	BMV Land	It is acknowledged the Scheme will result in the permanent loss of 19.69 ha of Grade 1 best and most versatile agricultural land. However, this loss represents 0.03% of land classified as Provisional Grade 1 land in Lincolnshire. This calculation is based on the 75,757 ha of Provisional Grade 1 land in Lincolnshire as defined by MAFF (1983)[5]. All soils permanently disturbed would be reused on site where practicable, with all soil handling undertaken in line with published good practice as set out in the Outline Soil Management Plan. It is incorrect that the Substation Works would result in the permanent loss of 106.9 ha of soil as stated in the consultation response. 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 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. 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. Several factors influence food prices, including climate change, geopolitical events, supply chain disruptions etc. The DEFRA (2024) UK Food Security report states that the impacts of climate change both at home and abroad remains a pressing risk to food security. In addition, the Applicant acknowledges the comments from the Planning Policy Officer regarding the lack of brownfield sites and no reasonable alternative for the Proposed Development to be located somewhere other than within the countryside. Part D of Policy 1 in the SELLP states: *"In the Countryside development will be permitted that is necessary to such a location and/or where it can be demonstrated that it meets the sustainable development needs of the area in terms of economic, community or environmental benefits."* Notwithstanding the social, economic and environmental benefits outlined within the PDAS, as it is not possible for the Proposed Development to be located somewhere other than the countryside (as per the Planning Policy Officer's comments), the siting of the substation in this location is considered necessary to such a location. Therefore the principle of the development is supported by local planning policy. The PDAS sets out that there were no alternative sites with a lower BMV raring or flood risk available. The location here 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 in the Weston Marsh area. Whilst it is noted that the site would result in the loss of BMV land significant weight should be given to need of the development and the principle of the development.	GWNC-ARU-SS50-XXXXXX-RPT-CP-000002 GWNC-ARC-SS50-XXXXXX-RPT-ES-000002
"In the unspoilt, flat Fenland a substation risks dominating the landscape, given it will be 12.5 metres tall (approximately 40 feet). Along with the proposed accompanying pylons, which will be nearly	Landscape and Visual	Impacts as a result of the Scheme upon the landscape were considered within the Landscape and Visual Appraisal submitted in support of the Planning Application. This assesses the Scheme in its entirety within the existing environment. The rationale for locating the Weston Marsh Substation A in the	GWNC-GIL-SS50-XXXXXX-RPT-ES-000001

[5] Agricultural Land Classification of England and Wales – The Distribution of the Grades; MAFF (1983) Technical note TN/RP/01 TFS 846

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50 metres high, this infrastructure will be highly intrusive, changing the character and nature of the surrounding environment. This impact is acknowledged in the submitted Landscape and Visual Appraisal, and whilst the application refers to mitigation proposals, such as planting of woodland, this will take a long time to have a meaningful impact, and residents are sceptical that measures will match up to promises. *I have previously asked National Grid to look at options for siting infrastructure of this kind below ground level, perhaps 6 to 12 feet lower, notwithstanding the obvious mitigations needed in respect of potential flooding. I would welcome further analysis on this option, which would drastically reduce the impact on the landscape.* *It also appears that these proposals are contrary to South East Lincolnshire Local Plan Policies 2, 3, and 28, in addition to the provisions in the National Planning Policy Framework which relate to visual amenity and landscape character."*		proposed location is directly linked to the existing presence of major electricity transmission infrastructure within the landscape, namely the existing 4ZM and 2WS overhead lines which meet at Spalding Tee-Point. This existing infrastructure has a significant influence upon the existing character of the local landscape. The assessment concludes, based upon the inclusion of the Indicative LEMP, that any impacts as a result of the Scheme to upon landscape character, community areas, and recreational routes and receptors would be minor adverse at worst at operational year 15, with many impacts assessed as negligible at year 15. Locating the new Weston Marsh Substation A close to the tee point between existing 400 kV overhead lines reduces the amount of new overhead line required, reducing the spread of new infrastructure within the landscape and views. The locations of access tracks and bellmouths has minimised loss of vegetation, reducing the loss of existing vegetation which in turn would help to screen and filter views of the Scheme. Proposed planting as additional mitigation has taken regard of the local landscape, introducing woodland belts to mimic existing woodland belts such as that along Lord's Drain and focussing on screening and filtering views from the closest visual receptors so that the landscape remains as open as possible. Siting substation infrastructure below ground level would result in significant additional complexity, cost and buildability challenges. The volume of earthworks required would be significant and associated works would increase the risk of effects upon wider aspects of the environment, including geology and hydrogeology. There would be significantly greater long term maintenance requirements and greater risk of disruption during potential flood events. Undergrounding a large 400 kV substation is therefore not considered technically feasible or justified. The use of undergrounding for overhead lines has previously been considered in siting work conducted for the Grimsby to Walpole project, in section 2.3 of the CPRSS. At the alternating current (AC) transmission voltage of 400 kV, the use of buried cables involves significant technical complexity. The size, number and complexity of the underground cables required is far greater than those that operate at lower voltages or direct current (DC) cables. As a result, direct buried transmission cables are materially more expensive compared to an equivalent overhead line. Moreover, and as noted within NPS EN-5 which relates to transmission routes supports, underground cables typically bear a significantly higher lifetime cost of repair and later uprating. As stated in Paragraph 1.2.1 of NPS EN-1, whilst primarily applicable to National Significant Infrastructure Projects (NSIPs), in England, in combination with any relevant technology specific NPSs (i.e. NPS EN-5), it may be a material consideration in decision making on applications that fall under the TCPA. For these reasons, the NPS EN-5 supports, in most instances (excluding developments which cross part of a nationally designated landscape), the strong starting presumption for the development of overhead lines rather than underground cables. With respect to compliance with SELLP policies 2, 3 and 28, please see the Applicants earlier response in to comments provided by Councillor Eldridge.	
"Furthermore, I am concerned about the cumulative impact of the numerous large scale energy infrastructure proposals for the South Holland area. I note that the substations, once constructed, would necessitate the building of further overhead pylons, totalling just over 1 mile for Substation A, and an unspecified length of Substation B. *As such, this application should be seen as part of a much bigger package of proposed development in the locale. I am concerned that this application does not fully acknowledge the additional interconnected infrastructure, most obviously the 250 giant pylons it will necessitate, in some cases spaced just 330m apart, running from the north of my constituency near to Surfleet Seas End to land south of Sutton St James, and, as such, fails to convey the true extent of its cumulative impact. More broadly, development of this kind begets further proposed energy infrastructure development,*	Cumulative Impact	A Cumulative Effects Assessment Report was submitted in support of the Planning Application based upon pre-application engagement with SHDC. This assessment considered the Scheme in its entirety alongside a long list of other committed developments within a maximum radius of 20 km (depending on development category) of the Scheme. 19 other existing and/or approved developments were included in the short-list and potential cumulative effects assessed in further detail. This short-list included wider infrastructure intended to connect to the Weston Marsh Substation A. Therefore, the Applicant considers the cumulative effects of the Scheme have been assessed and reported as part of the Planning Application. The assessment concluded that the Scheme is not likely to result in significant cumulative effects above and beyond those already reported for the Scheme and the other existing and/or approved developments in isolation. As set out within the Planning Design and Access Statement, the Scheme in its totality is a standalone development to enable connection of the ODOW Farm to the national electricity transmission system. The Scheme would fully function as part of the national electricity transmission system (NETS) and is not dependent on any additional infrastructure proposed as part of the Grimsby to Walpole Project DCO application. The Scheme is not an NSIP and is therefore subject to consent via the TCPA process.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000020 GWNC-ARU-SS50-XXXXXX-RPT-CP-000002

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with little or no consideration for the overall impact on the local environment or residents' quality of life."		Following submission of the DCO application for the Grimsby to Walpole Project, the effects of this NSIP will be considered in detail by the Planning Inspectorate during examination.	
"I have been contacted by residents in the area of the proposed development who are anxious about how the local road infrastructure, mostly single-track roads, already in poor condition, could cope with an increased volume of traffic resulting from the construction and ongoing maintenance of the sites. The impact of these additional vehicle movements will disrupt local residents and businesses, and create unwanted noise, dust and vibrations in an otherwise quiet setting. The consultation includes scant details on access, and lacks specific details about the locations and timeframes for required road works. I could not see proposals from National Grid to support the funding of this damage to the local road infrastructure, and so it is plainly unfair to expect the council, and thus taxpayers, to foot the bill."	Highway Impacts	A Transport Statement and Outline CTMP were submitted in support of the Planning Application. The Transport Statement assesses construction traffic resulting from the Scheme. Percentage impacts on the main road network due to construction traffic from the Scheme are forecast to be low. Percentage differences on Marsh Road and Stone Gate are much higher, but the overall number of construction traffic vehicles are modest and impact on these roads will be temporary and it is not considered that this will result in severe impact on the operation of the local highway network. Road widening is proposed on Stone Gate to make it suitable for HGV traffic and reduce potential disruption to users, and a dedicated haul road is proposed mid way up Stone Gate which then takes any HGV traffic associated with the Scheme off the rest of Stone Gate and Marsh Road. Marsh Road and the section of Stone Gate north of the haul road would only be utilised by construction worker cars/vans. Temporary suspension and diversion of PRoW Ref Wstn/7/1 is required to maintain safe movement of pedestrians during construction. Details of this will be agreed with the local highway authority and measures in place to advise users of the PRoW. Detailed assessment of construction traffic impacts was scoped out of the Noise and Vibration and Air Quality assessments as construction traffic flows are low and do not meet the thresholds for further detailed assessment. It is considered any impacts from construction traffic would be adequately controlled by the CTMP or the CEMP which includes measures to limit any noise and air quality impacts. Potential impacts from dust have also been considered within the Air Quality assessment. It was predicted that the majority of dust releases would be temporary and short-term in nature and cease at the end of the construction phase. Following the application of mitigation measures in the Outline CEMP and in accordance with the IAQM Construction Dust Guidance[6], the effect is predicted to be negligible and not significant. The Outline CTMP set out the strategy and measures for managing construction traffic to be adopted by the Main Works Contractor. Sustainable modes of travel are encouraged where reasonable to reduce the impact of workforce travel on local residents and business and to reduce single occupancy car trips to site. A final CTMP will be adopted prior to construction of the Scheme. The Applicant has and continues to work closely with the local highway authority; it is anticipated this would be pursuant to a planning condition and agreed with the local highway authority. As such, it is considered that impacts from construction traffic resulting from the Scheme have been assessed and mitigated as far as reasonably practicable.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000018 GWNC-WSP-ZZZZ-ZZZZZZ-PLN-PM-000002 GWNC-WSP-SS50-XXXXXX-RPT-ES-000004 GWNC-ARU-SS50-XXXXXX-RPT-ES-000019
"I have also been contacted by constituents who live near to the proposed substation who feel their quality of life overall will be harmed by this development which will not bring them any benefits."	Residential Amenity	Impacts to local communities were assessed in the Socio-economic Impact Assessment for the Substation Works and within the Cumulative Effects Assessment Report. Whilst it is acknowledged that local residents have raised concerns over impacts of the development on amenity, the Substation Works are not predicted to give rise to any significant adverse effects. Potential effects during construction, including those associated with construction traffic, temporary disruption, noise, dust and vibration have been assessed in detail. Management measures which have been demonstrated on previous projects to be effective in managing the potential impacts of construction activity are specified within the Outline CEMP. This includes controls to manage construction traffic, maintain access, and minimise disturbance to nearby residents and businesses. As a result, any impacts during construction are anticipated to be temporary, localised and can be effectively managed such that significant environmental effects are not likely. During operation, whilst the new substation infrastructure will be visible within the landscape, as set out previously, once established, mitigation planting will provide an effective screening function. Operation and maintenance activities will be minimal.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000019 GWNC-ARU-SS50-XXXXXX-RPT-ES-000020

[6] Institute of Air Quality Management (2024) Guidance on the assessment of dust from demolition and construction [online] Available at: https://iaqm.co.uk/wpcontent/uploads/2013/02/Construction-Dust-Guidance-Jan-2024.pdf [Accessed 17 July 2026].

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		In 2025 the Government issued "Community Funds for Transmission Infrastructure: Guidance". In addition to our consultation and the planning system enabling communities to input into the proposals, National Grid has committed to follow the guidance. Through engagement with local communities and stakeholders, priorities will be developed that inform how the fund will be applied to benefit local communities.	
"I am concerned, too, that the construction of the substations will harm animal species and aquatic habitats in the drains, ditches and other natural environment in the area, and would like to know how National Grid will protect the environment from this industrial infrastructure."	Ecology / Aquatic Environment	Impacts on designated sites and protected species as a result of the Substation Works have been assessed in a detailed EcIA and Habitat Regulations Assessment (HRA) prepared for the Planning Application. The EcIA is supported by the following survey reports which together provide an extensive suite of relevant information: • Habitat Classification Survey Report; • Badger Survey Report; • Breeding Bird Survey Report; • Non-breeding Bird Survey Report; • Bat Survey Report; • Aquatic Survey Report; • Otter and Water Vole Survey Report; and • Great Crested Newt Survey Report. Based upon the mitigation measures illustrated on the Indicative Landscape and Ecology Mitigation Proposals and also set out within the Outline CEMP, significant effects upon habitats and protected and notable species in the area would be avoided. The Applicant will continue to engage with the relevant authorities, including SHDC, Natural England and the EA, to ensure that impacts upon wildlife are minimised as far as reasonably practicable.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000005 GWNC-ARU-SS50-XXXXXX-RPT-ES-000013 GWNC-ARU-SS50-XXXXXX-RPT-ES-000007 GWNC-ARU-SS50-XXXXXX-RPT-ES-000009 GWNC-ARU-SS50-XXXXXX-RPT-ES-000010 GWNC-ARU-SS50-XXXXXX-RPT-ES-000008 GWNC-ARU-SS50-XXXXXX-RPT-ES-000006 GWNC-ARU-SS50-XXXXXX-RPT-ES-000012 GWNC-ARU-SS50-XXXXXX-RPT-ES-000011 GWNC-GIL-SS50-XXXXXX-PLN-ES-000001 GWNC-ARU-SS50-XXXXXX-RPT-ES-000019 GWNC-ARU-SS50-XXXXXX-RPT-ES-000015
"There are also serious concerns relating to flood risk, given the site lies in a sensitively managed drainage environment. To this end, the consultation response from Anglian Water must be taken into close consideration, given it highlights the lack of a thorough investigation of the site in respect of flood risk."	Flood Risk	The Applicant has been engaging with the EA throughout development of the design and completion of the supporting assessment. These technical discussions informed the assessment scenarios within the FRA, which is considered to present a robust assessment of potential flood risk associated with the Proposed Development. The EA has also reviewed the flood model which provides the basis for the FRA. The Applicant remains in discussion with the EA to address further comments raised through the Planning Application process and as set out above, supplementary information has been provided with respect to specific consideration of a scenario in which the existing Lord's Drain Sluice/pumping station could fail. The response from Anglian Water does not indicate a lack of thorough investigation of the site in respect to flood risk. It instead notes the potential presence of unmapped public or private sewers, lateral drains, or other water infrastructure assets within the development boundary and therefore the need to conduct thorough utility search. The Applicant wholly accepts that thorough investigation is required, as is standard practice across the construction sector. The Applicant has examined available information sources and will continue to engage with landowners and conduct further surveys to inform the detailed drainage design and the final CEMP, which is anticipated to be agreed with SHDC via associated planning condition(s).	GWNC-WSP-SS50-XXXXXX-RPT-ES-000002
Natural England			
SUMMARY OF NATURAL ENGLAND'S ADVICE *FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES* *As submitted, the application could have potential significant effects on:* *• The Wash Site of Special Scientific Interest (SSSI),* *• The Wash Special Protection Area (SPA),* *• The Wash Ramsar, and*	Disturbance to Otter	The Habitats Regulations Assessment (HRA) has been updated to clarify the survey data regarding otters, and how they use the Scheme Site Boundary.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000014
	Bird Collisions	The HRA report has also been updated to create an Appropriate Assessment section. In that section, non-breeding bird survey data relating to the qualifying interests of The Wash SPA/Ramsar has been discussed more fully to justify a conclusion of no adverse effect on integrity, including potential effects from the existing and new sections of OHL being briefly present simultaneously	GWNC-ARU-SS50-XXXXXX-RPT-ES-000014

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• The Wash and North Norfolk Coast Special Area of Conservation (SAC). *Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation. The following information is required:* *• Further justification in the Habitats Regulations Assessment for screening out impacts from bird collision and disturbance to otter. Where a pathway to Likely Significant Effect is concluded, they should be taken through to the Appropriate Assessment stage.* Without this information, Natural England may need to object to the proposal. Please re-consult Natural England once this information has been obtained			
SHDC Case Officer – Summary of Local Community/Residents' Objections Received			
Application should not be decided locally outside of the NSIP process for Grimsby to Walpole.	Should be included within the NSIP	The Scheme is being progressed ahead of the Grimsby to Walpole DCO application due to the need for the Scheme to allow the ODOW Project to connect to the grid. The Scheme is a standalone development functioning independently of the outcome of the decision for the Grimsby to Walpole DCO, and therefore has been progressed separately. Further details providing a response on this matter are provided in **Appendix B** of this response letter.	
Environmental assessment incomplete because the infrastructure has been split across different consenting regimes.	EIA assessment incomplete due to differing consenting regimes	The application's supporting documents make clear that technical environmental assessments have been undertaken with regard to the Scheme as a whole, rather than treating each component (Substation Works, S37 Overhead Line Works and Exempt Overhead Line Works) in isolation. The application is supported by detailed technical studies and a Cumulative Effects Assessment was prepared to examine the combined effects of the Scheme in combination with other committed developments in the area. The use of different consenting mechanisms reflects the legal requirements which apply to each component of the Scheme. Furthermore, the fact that infrastructure components are consented separately does not mean that environmental effects have been fragmented or understated. The application demonstrates that cumulative effects with ODOW, Meridian Solar and the Grimsby to Walpole DCO have been assessed through both the screening process and standalone Cumulative Effects Assessment. As previously stated, the Weston Marsh Scheme is a standalone project required to facilitate the connection of ODOW by 2030 and is capable of functioning independently of the outcome of the future Grimsby to Walpole DCO application. Consequently, the environmental information before decision-makers is comprehensive, proportionate and capable of providing a robust understanding of the likely environmental effects of the Scheme, notwithstanding that different components are being authorised through separate consenting regimes.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000020
Damage to farmland, wildlife and Fenland environment.	BMV Land	As stated previously, the Scheme builds on extensive siting work conducted by National Grid in relation to 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 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. 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. At all stages of option appraisal process, the Applicant has sought to balance potential environmental impacts with broader appraisal criteria, including technical feasibility, cost and constructability. This has included application of the Horlock Rules and Holford Rules which are applicable to the routing of high voltage transmission lines and substation siting respectively and adherence with the relevant National Policy Statement guidance.	GWNC-ARC-SS50-XXXXXX-RPT-ES-000002 GWNC-ARU-SS50-XXXXXX-RPT-ES-000005 GWNC-GIL-SS50-XXXXXX-PLN-ES-000001 GWNC-ARU-SS50-XXXXXX-RPT-ES-000019

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		It is acknowledged the Scheme will result in environmental impacts, but as demonstrated via the EIA Screening process and the technical documentation submitted in support of the Planning Application, the Scheme is not likely to result in significant adverse effects upon the environment. Impacts include the permanent loss of 19.69 ha of Grade 1 best and most versatile agricultural land. However permanent use of agricultural land has been minimised as far as practicable and this loss represents 0.03% of land classified as Provisional Grade 1 land in Lincolnshire. This calculation is based on the 75,757 ha of Provisional Grade 1 land in Lincolnshire as defined by MAFF (1983)[7]. All soils permanently disturbed would be reused on site where practicable, with all soil handling undertaken in line with published good practice as set out in the Outline Soil Management Plan. The potential for impacts to wildlife have been considered within the EcIA and associated ecological survey reports, and the potential for impacts to landscape have been considered within the Landscape and Visual Appraisal. Informed by these assessments, robust mitigation proposals are included within the Scheme and are illustrated on the Indicative LEMP plan submitted in support of the Planning Application. During construction, potential impacts to farmland, wildlife and the Fenland environment would be controlled through the measures specified in the final CEMP, the detail of which is anticipated to be agreed with SHDC via associated planning condition(s). The Outline CEMP and a supporting Outline Soil Management Plan (SMP) were submitted in support of the Planning Application.	
Harm to local communities and overwhelm roads.	Highway Impacts and impacts on residential amenity	A Transport Statement has been prepared for the Scheme, which assesses the potential for impacts to the traffic environment. While construction of the Substation Works and S37 Overhead Line Works will result in a temporary increase in traffic, this will be managed to maintain efficient operation of the highway network. Potential effects upon communities during construction, include those associated with construction traffic, temporary disruption of PRoW, noise, dust, vibration and visual intrusion. Detailed assessments of likely impacts have been undertaken through the following assessments submitted in support of the Planning Application: Socio-economic Impact Assessment, Cumulative Effects Assessment, Transport Statement, Noise and Vibration Assessment, Air Quality Assessment and Landscape and Visual Appraisal. As set out within the suite of documentation, whilst temporary disruption would occur during construction, based upon the application of robust management measures, impacts are not predicted to result in significant harm to communities. The assessments identified based upon the application of best practice methodologies, that impacts could be mitigated through measures identified in the Outline CEMP. These measures include controls to manage construction traffic, maintain access where practicable, and minimise disturbance to nearby residents and businesses. As a result, any impacts during construction are anticipated to be temporary, localised and effectively managed. Mitigation measures have been identified where required and all highway and access works will adhere with the appropriate design standards to ensure road safety. Impacts to walkers, wheelers, cyclists and users of PRoWs will be minimised as far as practicable. The Proposed Development includes a dedicated temporary on-site haul road to divert HGV flows off the local road network and avoid movements which would otherwise be routed along Stone Gate and Marsh Road. An Outline CTMP has been prepared for the Scheme to demonstrate that the Scheme is planning and managing construction traffic / logistics appropriately. A Final CTMP will be adopted prior to construction of the Scheme, it is anticipated this would be pursuant to a planning condition and agreed with the local highway authority.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000018 GWNC-ARU-SS50-XXXXXX-RPT-ES-000019 GWNC-ARU-SS50-XXXXXX-RPT-ES-000020 GWNC-ATG-SS50-XXXXXX-RPT-ES-000001 GWNC-WSP-SS50-XXXXXX-RPT-ES-000004 GWNC-GIL-SS50-XXXXXX-RPT-ES-000001 GWNC-ARU-SS50-XXXXXX-RPT-ES-000019 GWNC-WSP-ZZZZ-ZZZZZZ-PLN-PM-000002
Severe Highway Risks and Infrastructure Damage.	Highway risks and infrastructure damage	Regarding infrastructure damage, in accordance with Outline CEMP measure GG05, a record of condition will be carried out (photographic and descriptive) of the working areas that may be affected by the construction activities, prior to works commencing. This record will be available for comparison following reinstatement after the works have been completed to ensure that the standard of reinstatement at least meets that recorded in the precondition survey.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000019

[7] Agricultural Land Classification of England and Wales – The Distribution of the Grades; MAFF (1983) Technical note TN/RP/01 TFS 846

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		During operation and maintenance the substation would be unmanned under normal operating conditions and as set out previously. Operational activities would therefore be limited in scale and frequency, and existing access arrangements would be retained. Detailed design of highway works will be informed by Road Safety Audits, which the Applicant has commenced. We anticipate this to be formalised through a planning condition. Further responses are provided below in relation to landscape and visual impacts, flood risk and noise.	
Damage to Historic Fenland Landscape; Landscape Intrusion	Landscape	The impacts of the Scheme upon landscape and visual amenity were considered within the Landscape and Visual Appraisal, which assesses the presence of the Scheme in its entirety within the existing environment. The assessment concludes that any impacts as a result of the Scheme to landscape character, community areas, and recreational routes and receptors would be minor adverse at worst at operational year 15, with many impacts assessed as negligible at year 15. In assessing the impacts of the Scheme upon local landscape character, the existing context is taken into account, which includes major electricity transmission infrastructure in the form of the existing 4ZM and 2WS overhead lines. Given that the Weston Marsh Substation A would introduce a new component of transmission infrastructure, extensive screening planting as illustrated on the Indicative LEMP has been included within the Scheme to mitigate impacts upon landscape character and views. Locating the new Weston Marsh Substation A close to the tee point between existing 400 kV overhead lines reduces the amount of new overhead line which would otherwise be required at an alternative location, reducing the spread of new infrastructure within the landscape and views. The locations of access tracks and bellmouths has minimised loss of vegetation, which in turn would help to screen and filter views of the Scheme. Proposed planting as additional mitigation has taken regard of the local landscape, introducing woodland belts to mimic existing, such as that along Lord's Drain and focussing on screening and filtering views from the closest visual receptors so that the landscape remains as open as possible.	GWNC-GIL-SS50-XXXXXX-RPT-ES-000001
Application conflicts with national policy (EN1 and EN 5 expects grid upgrades to be coordinated and to use existing substations and corridors where possible) and has no alternatives assessment	National Policies	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 and 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 CPRSS prepared in support of Stage 1 consultation to provide the public and stakeholders with technical information on the project, needs case, options considered and routeing and siting options assessed and a preferred route. 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. At set out previously, the presence of an existing transmission infrastructure corridor in the Weston Marsh Area has been a key factor in determining the preferred location of Weston Marsh Substation A. Specifically, this includes the existing 4ZM and 2WS overhead lines which converge at the Spalding Tee-Point. The substation has been located close to these overhead lines, to reduce the need for additional new overhead line infrastructure. Were the substation located further from existing overhead lines, then a greater number of new pylons and additional length of new overhead line would be required to connect the substation to the existing network. The documentation supporting the Planning Application was prepared in accordance with NPS EN-1 and EN-5. Section 7 of the Planning, Design and Access Statement presents a planning appraisal providing a summary of the Scheme's compliance with relevant planning policy and material considerations.	GWNC-ARU-SS50-XXXXXX-RPT-CP-000002
Failure to account for Population Growth - National Grid's traffic and socio-economic baseline data is completely outdated. It fails to model the cumulative impacts on an expanding community, entirely ignoring the approximately 200 new homes built in Weston between Autumn 2024 and Spring 2026. This growth has already increased the baseline traffic and pressure on rural infrastructure.	Population Growth	Data on future population growth is sourced from population projections produced by the Office for National Statistics (ONS) at a local authority level. These projections provide the most robust and consistent estimate of future demographic change across the study area and are considered appropriate for assessing the future baseline as they are produced using a nationally recognised methodology and reflect expected changes in births, deaths and migration over time. Whilst local authority-level projections may not fully capture the latest changes within individual settlements, they	GWNC-ARU-SS50-XXXXXX-RPT-ES-000018

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		provide a robust basis for understanding population growth and wider demographic trends across the relevant district and regional geographies. Baseline traffic conditions and assessment is provided in the Transport Statement, which includes consideration of planned and committed developments. Engagement with the local highway authority to agree the approach to assessment was conducted prior to the submission of the Planning Application.	
Flood Risk and Sequential Test failure. The site sits entirely within Flood Zone 3. Under the National Planning Policy Framework (NPPF) and Local Plan Policy LP14, major industrial developments must pass the Sequential Test by proving no alternative lower-risk sites exist. The applicant has failed to provide a rigorous district-wide site selection analysis, making approval a clear breach of flood risk policy.	Sequential Test Failure	Section 8 of the FRA submitted in support of the Planning Application applies the sequential and exception tests required under the NPPF. 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 and 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 CPRSS prepared in support of Stage 1 consultation to provide the public and stakeholders with technical information on the project, needs case, options considered and routeing and siting options assessed and a preferred route. 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. Having applied the sequential test, it was demonstrated that it is not possible for the new Weston Marsh Substation A to be located in an area with a lower risk of flooding from rivers and the sea, and therefore the exception test was applied. The exception test, as defined by Paragraph 31 of the PPG Flood risk and coastal change guidance requires that: *a). the development would have wider sustainability benefits to the community that outweigh flood risk; and* *b). the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.* In response to requirement (a), the wider sustainability benefits of the development are that the proposed Scheme would help to replace parts of the electricity transmission network which were developed in the 1960s and currently offer limited ability to support planned connections (to new generation) on the east coast. In response to requirement (b), hydraulic modelling predicts that the proposed Weston Marsh Substation A would not be at risk of flooding from tidal sources in the design flood event; the 0.1% annual probability plus Upper End climate change (2105 epoch) over its predicted 75 year design life. There is a residual risk to the location of the proposed Weston Marsh Substation A in the 0.1% annual probability plus Upper End climate change (2105 epoch) breach scenario. The proposed substation has been designed to remain operational and resilient in this scenario, by being set on a raised platform providing a minimum freeboard of 300mm above predicted flood levels in this scenario, in compliance with National Grid Technical Specifications (2.10.13) and the EA South East Lincolnshire flood risk standing advice. This would also provide mitigation and resilience against the residual risk of fluvial flooding from IDB managed watercourses in the event of infrastructure failure. Off-site impacts as a result of the above mitigation are minor, with a negligible impact on flood hazard at identified receptors. This conclusion was agreed with the EA in pre-application consultation in March 2026. Therefore, the information presented above and in Section 8 of the FRA demonstrates that the exception test has been passed.	GWNC-WSP-SS50-XXXXXX-RPT-ES-000002
Noise and Pollution	Noise and Pollution	A Noise and Vibration Assessment has been prepared for the Scheme, which considers the Scheme in its entirety. The assessment indicates that significant adverse impacts are not expected from the Scheme during either the construction or operational phases where standard mitigation measures are incorporated into the works. Outline noise and vibration mitigation options have been provided indicating how significant adverse effects can be avoided and adverse impacts would be mitigated and minimised during construction. Measures for noise and vibration have been included within the Outline CEMP for	GWNC-ATG-SS50-XXXXXX-RPT-ES-000001 GWNC-ARU-SS50-XXXXXX-RPT-ES-000019

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		the Scheme. The final CEMP would be prepared by National Grid which is anticipated to be subject to agreement with SHDC via associated planning condition(s).	
No Local Benefits.	Local Benefits	Community Funds are intended to recognise the role communities play in hosting new electricity transmission infrastructure. They are designed to deliver positive, long-term benefits for those areas. Where planning consent is granted for qualifying infrastructure, National Grid will deliver a dedicated Community Fund to support social, economic and environmental benefits for communities near to the project. Eligibility is based on communities closest to qualifying infrastructure, in line with Government guidance. Understanding community needs is central to how Community Funds are designed and delivered. We encourage involvement from residents, charities, community groups and elected representatives throughout the process. Community feedback helps inform funding priorities, delivery approaches and investment decisions. Work has already begun on understanding local priorities through research and the community fund survey.	
Wrong Location should be located in an industrial area not countryside.	Siting	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 and 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 CPRSS prepared in support of Stage 1 consultation to provide the public and stakeholders with technical information on the project, needs case, options considered and routeing and siting options assessed and a preferred route. 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. The siting of the Scheme and the Grimsby to Walpole project was conducted in accordance with the Holford and Horlock Rules, industry standard guidelines for minimising the environmental and visual impact of major grid infrastructure projects. The guidelines now form an important part of national planning policy relating to the development of electricity networks, as set out in National Policy Statement EN-5. An overarching consideration in these guidelines is to limit the spread of infrastructure as far as reasonably practicable to limit the potential for environmental effects and to reduce the technical complexity of grid infrastructure projects. The Scheme has been situated in close proximity to the existing Spalding Tee-Point which offers the greatest opportunities to limit the spread of environmental effects. The Applicant notes the response from Boston BC, which confirms that there are no brownfield sites available in SHDC's area to accommodate a substation and therefore a location in countryside is necessary. The response is repeated below: "*This proposal is in the 'Countryside' as defined by Policy 1 of the SE Lincolnshire Local Plan.* *As such proposals will be permitted that are "necessary to such a location and/or where it can be demonstrated that it meets the sustainable development needs of the area in terms of economic, community or environmental benefits".* *This type of development must go in the countryside as plainly it can't fit into an urban location. South Holland does not have any large brownfield sites, such as former RAF stations, like those found in East Lindsey, and so agricultural land will be used."*	
Conflict with Construction Traffic and exercising of horses from Hall Gate and Weston Marsh River Bank.	Construction impact on equestrian activities	Construction HGVs will be routed from the A151 via Stone Gate on to a new haul road for access to the works sites. Construction workers cars/vans will also use Marsh Road to the west of the substation site. The haul road is provided to reduce HGV impacts on local roads and potential conflicts with users, including equestrians. While footpath Wstn/7/1 will be temporarily diverted during construction, equestrian routes are not considered to be impacted. Construction traffic impacts will be managed through the CTMP to be agreed with the local highway authority.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000018 GWNC-WSP-ZZZZ-ZZZZZZ-PLN-PM-000002

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Stonegate not suitable for Construction Traffic particularly its current bad condition and narrow width.	Construction impact on existing highway	The provision of the construction haul road would reduce the extent of Stone Gate use by construction HGVs. The use of Stone Gate has been discussed with LCC as the local highway authority. Mitigation measures have been identified to provide localised widening to accommodate HGV movements along the southern section of the route, prior to these utilising the dedicated haul road. As part of the CTMP, construction traffic will be managed, including through monitoring the condition of the local highway and identifying remedial works if required. This will be agreed with LCC through the CTMP process.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000018 GWNC-WSP-ZZZZ-ZZZZZZ-PLN-PM-000002
South Holland Case Officer			
"I'm not clear how the temporary PROW diversion is being dealt with? Is the diversion going to be applied for separately under the Highways Act rather than via section 257 of the TCPA ?"	How PROW diversion is being dealt with	The Transport Statement identifies that temporary suspension and diversion of PRoW Ref Wstn/7/1 is required to maintain safe movement of pedestrians during construction. The details and mechanism for the temporary diversion of the PRoW during construction is yet to be agreed with the local authorities. This will include agreeing measures to inform users of the PRoW. The most appropriate route is to be agreed with the SHDC.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000018
"The Correction Notice has been received but the relevant documents are also going to need to be amended and submitted."	Correction Notice and Amended Documents	This response letter is accompanied by the submission of updated documents as detailed in Table 1 of the letter to address this matter.	
"Does the Correction Notice affect the calculation of the permanent loss of 19.69 hectares of BMVAL?"	How Correction Notice impacts BMV	The correction notice recently issued by the Applicant does not change the calculated temporary and permanent loss of BMV land as a result of the Scheme.	GWNC-ARC-SS50-XXXXXX-RPT-ES-000002
"Clarify whether GIS over AIS was considered and whether GIS would have reduced the landscape and visual impact of the AIS Substation i.e. a reduced footprint?"	GIS over AIS	There are two main types of substations; Air Insulated Switchgear (AIS) substations and Gas Insulated Switchgear (GIS) substations. 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. However, they require a larger area of land and, as they are exposed to the elements, are not recommended for certain environments such as coastal areas. 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. GIS substations typically require less space, and this may have a reduced visual impact as a result. 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. As noted within NPS EN-5 (Paragraph 2.9.61), it should be considered carefully whether Proposed Development could be reconceived during the design phase to avoid the use of SF6-reliant assets. NGET 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. For new substations, GIS is typically only implemented where there are significant space constraints or in areas where atmospheric pollution may impact outdoor AIS equipment (for example, due to nearby industry or in marine environments). In the absence of any requirements to use GIS for the Substation Works included the provision of an AIS substation. Despite a larger land take for AIS, GIS is considered to have a greater impact on views and landscape character due to the height and scale of the building surrounding the equipment.	
"Clarify connection date for ODOWF and completion date of the Substation to allow this? Different in various reports? I thought the connection date was 2030 but some documents suggest that the completion of the substation is 2031 or are these elements that do not affect connection. Please clarify?"	Connection Date for ODOWF and Completion date of Substation	The substation and overhead line works necessary to connect the ODOW development to the electricity transmission system are to be completed by 2030. However, some activities, including landscape mitigation, ecological management and monitoring, ancillary and reinforcement works associated with the transmission corridor, are likely to continue into 2031 as part of the longer-term delivery and operation of the Scheme. Such activities form part of the longer-term implementation and operational phase of the project and will be undertaken in accordance with the relevant approval requirements, management plans and statutory obligations.	

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"Can you advise where the impact of the drain diversion on ecological receptors/species is considered and/or mitigated within the submission please?"	Impact of Drain Diversion on Ecological Receptors/Species	Impacts and effects on protected species are presented within the EcIA submitted in support of the Planning Application, a summary is provided below. Otters have large home ranges and so are unlikely to be significantly impacted by the diversion, when taking into account best practice measures to control lighting and pollution during construction via the CEMP. No otter resting places will be affected by the ditch diversion. Based on survey information, water vole populations are only present in Lords Drain which is unaffected by the diversion. The ditches between the diversion and Lords Drain were also dry when surveyed, therefore, water voles are unlikely to be significantly impacted by the diversion. Aquatic Ecology scoping surveys deemed the watercourse to be unsuitable to support fish populations as it was heavily incised and managed, dry on several survey occasions and heavily terrestrialised. Macroinvertebrate surveys were scoped in on a precautionary basis, but when surveyors visited it was dry. Therefore, no notable aquatic species have been found in the ditch/watercourse proposed to be diverted The watercourse has not been identified as an important foraging or commuting route for bats and therefore bats are unlikely to be significantly impacted by the diversion.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000005
"Where does the Intergen pipeline line run in relation to the application site? Are NGET in discussions regarding protective provisions with Intergen?"	InterGen Pipeline	The Applicant is in contact with InterGen regarding a crossing agreement to ensure the continued safe operation and maintenance of the pipeline during construction and operation of the Scheme. A plan (GWNC-WSO-SS530ENABLE-DRW-HY-000001) is enclosed with this response indicating the pipeline route, to the south of the Site. The draft protective provisions relate to the Grimsby to Walpole DCO and will be finalised in accordance with the DCO timetable. In advance of that, the crossing agreement will address the relevant protections for the Scheme.	GWNC-WSO-SS530-ENABLE-DRW-HY-000001
South Holland Ecology Officer			
The Biodiversity Net Gain information submitted with this application is rigorous and the authority can be confident that the development can achieve the mandatory 10% net gain requirement, however, a few minor details require clarification prior to works beginning (described below). *1. Biodiversity Net Gain Assessment Comments* *1.1 Overall, the biodiversity net gain assessments, habitat maps, and statutory metric appear suitably detailed and rigorous such that the authority can be confident in their conclusions. In addition, the approach taken to on-site biodiversity provision is justifiable and reasonable, wherein, 10% BNG can be achieved via a mix of on-site and off-site provision (on-site: approximately 146.42 habitat units, 8.43 hedgerow units, 18.92 watercourse units, off-site: 52.42 habitat units, 4.53 watercourse units). However, there are three minor issues with the metric assessment (listed below) that will require either confirmation or correction, but these can be agreed and finalized pre-commencement and do not significantly affect the metric's conclusions or the authority's confidence that the 10% BNG requirement will be met.* *1.2 Please note that the authority should include a condition requiring the applicant to submit for approval a habitat management and monitoring plan (HMMP) along with their biodiversity gain plan prior to works commencing. In addition, due to the extent and relative significance of on-site biodiversity provision, the authority should seek to secure the HMMP and on-site gains via a s106 planning obligation pre-commencement.*	Biodiversity Net Gain	The Applicant welcomes the comments from the SHDC Ecology Officer and the recommendation to include an associated planning condition requiring a habitat management and monitoring plan (HMMP), along with a biodiversity gain plan, to be submitted to the LPA for approval prior to works commencing. These outputs are identified as requirements within the Biodiversity Net Gain Report. **Hedgerow Habitats Clarification** These are correctly shown in the metric, there is a second row (Tab B-1, Row Ref 3) for the ecologically valuable line of trees which includes the 40m loss that is referenced in the report, no additional changes to the BNG report or metric are required. No medium sized or larger trees are lost out of the lines of trees impacted. **Strategic Significance Clarification** It is acknowledged that the draft Local Nature Recovery Strategy (LNRS) for Greater Lincolnshire has been incorrectly interpreted in how strategic significance has been applied to woodland creation within the BNG metric for the Project. This has been corrected and the metric and BNG report updated and re-issued to correct this error. **Seed Mix Clarification** Seed mixes will be chosen during the detailed design in discussion with the relevant stakeholders. The Applicant does not place any restrictions on the use of alternative seed mixes, but would however note that given the management regime, use of these would be subject to agreement with the asset owner/manager.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000015 GWNC-GIL-SS50-XXXXXX-PLN-ES-000001

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1.3 - Minor issues requiring correction/clarification prior to works commencing: *i. 1.3.1 Hedgerow habitats.- Paragraph 6.3.5 (page 27) of the biodiversity net gain report states that 40 m of an ecologically valuable line of trees will be removed, however, the metric records the entirety of the "ecologically valuable line of trees" habitat as retained, and instead shows two small sections of "line of trees" as lost (one section is 2 m long and the other is 4 m long). Therefore, we require confirmation about which habitats will be lost and that these are recorded correctly in the metric. In addition, we require confirmation that if any medium-sized or larger trees are lost out of a linear-habitat line of trees, then these should be recorded as lost individual trees in the metric's area habitats baseline as directed on page 63 of the statutory metric handbook.* *ii. 1.3.2 Strategic Significance.- The metric currently records the post-development woodland planting as strategically significant; however, Lincolnshire's draft Local Nature Recovery Strategy does not specifically define woodland or wet woodland planting in this area as a strategic action, and we ask that further justification is provided for this classification, otherwise, this habitat should be recorded as "area/compensation not in local strategy".* *iii. 1.3.3 I note in the post-development habitat maps that the banks of the proposed stream rerouting (806m) is to be seeded with a standard Emorsgate amenity grass mix, however, even if the management of the banks is constrained by other factors over the 30 year period, I strongly recommend that a more ecologically valuable approach to habitat creation is taken. For example, the Lincolnshire Wildlife Trust could help facilitate sourcing a suitable local riparian see mix, or as a last option, an Emorsgate EM8 Meadow mixture for wetlands could be used.*			
In accord with the consultation response submitted by the Lincolnshire Wildlife Trust, I note that various protected species surveys are not yet included (in redacted form) on the planning portal, but which are required to ensure that all relevant material considerations are included in the decision process (e.g., water vole, otter, GCN/HSI, and bat). Therefore, I strongly urge that a decision is not issued until this information has been made available for comment. Local authorities have a duty to demonstrate engagement with the directives of the Habitats and Species Regulations 2019, which requires that LPA's can demonstrate that they have rigorously obtained knowledge of any significant impacts that a development may have on local populations of protected species to weigh as a material consideration in the decision process and to determine suitable mitigation prior to determination.	Protected Species Surveys	It is acknowledged that some protected species surveys were outstanding at the time of submission. The Applicant has updated the Aquatic Survey Report and Great Crested Newt Survey following the completion of surveys and these are attached in support of this response. Additionally an updated copy of the Otter and Water Vole Survey Report will be provided to SHDC in August. Bat surveys are due to be completed in August 2026 and the Applicant intends to provide an updated copy of the Bat Survey Report to SHDC by the end of August 2026. The updated survey results do not change the conclusions of the EcIA submitted in support of the Planning Application. Following the implementation of embedded mitigation and control measures outlined within the Indicative LEMP and the Outline CEMP, no significant residual effects resulting are predicted during either construction or operation of the Proposed Development. Notwithstanding this, an updated EcIA Report will also be provided to SHDC for completeness alongside the updated Bat Survey Report.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000006 GWNC-ARU-SS50-XXXXXX-RPT-ES-000011 GWNC-ARU-SS50-XXXXXX-RPT-ES-000012 GWNC-ARU-SS50-XXXXXX-RPT-ES-000008 GWNC-ARU-SS50-XXXXXX-RPT-ES-000005 GWNC-GIL-SS50-XXXXXX-PLN-ES-000001 GWNC-ARU-SS50-XXXXXX-RPT-ES-000019
Natural England has requested further information in their consultation response to the shadow HRA screening provided by the applicant and I wish to echo their concerns. There are a shortfalls in the information supplied within the HRA revolving around the development's potential impacts to the Wash's designated features, e.g., disturbance and temporary movement barriers to otters, as well as impacts to non-breeding bird assemblages from loss of functionally linked land and increased	HRA Information Requirements	Regarding the loss of functionally linked land, the Applicant does not agree that the number of birds in flight is a useful indicator of whether the land they are flying over constitutes functionally-linked land of significance for those species and we are not aware that overflight data is ever used in that way. Only the presence of birds within the fields can be an indicator of whether they use those fields. While the surveys are only a sample, this is true for any species survey and takes account of variability in bird activity through capturing multiple wintering periods and (as noted in the comment) a 500m buffer around the survey area. The survey method that was used follows standard practice and was discussed with Natural England. It would be disproportionate to assume that birds overflying an area also roost	GWNC-ARU-SS50-XXXXXX-RPT-ES-000009 GWNC-ARU-SS50-XXXXXX-RPT-ES-000005 GWNC-ARU-SS50-XXXXXX-RPT-ES-000012

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mortality from collisions with overhead lines (OHL). Therefore, I strongly advocate that a decision is not issued until the applicants supply further information to the authority to consider in consultation with Natural England. *i. 2.2.1 Loss of functionally linked land.- I would like to note that a specific shortcoming in the methods used is that functionally linked habitat loss was assessed on the basis of winter bird surveys recording birds on the ground and excluded birds observed flying over/through the development footprint. As noted in the HRA, winter bird use of foraging areas can be highly stochastic between and within years based on specific crop/rotation patterns, weather conditions over various time scales, predator movements/concentration, etc. To compensate, the surveys also included a 500 m buffer around the development, however, I observe that counts of flying Lapwing, Golden Plover, and Pink-footed Goose recorded from vantage surveys and transects were consistently an order of magnitude or more higher than numbers recorded on the ground within the 500 m buffer. These flocks could just as easily have landed within the development footprint at any other day/months/year. Therefore, I believe that the conclusions regarding the % of the designated feature population using these areas should be interpreted cautiously, even as Natural England accepts the HRA conclusion that the loss of this habitat (approx. 10.6 ha) in combination with other development projects will have no likely significant effects.* *ii. 2.2.2 Mortality from Overhead Head Lines.- I would like to note a similar criticism of the approach used to estimate the risk of collisions with OHLs, which appears to give much weight to the small number of flights of birds recorded at heights at risk of collision with wires (e.g. paragraph 6.4.5 of HRA, page 50), rather than considering the total number of Lapwing, Golden Plover, and Pink-footed Goose recording flying over the area in total (multiple sightings, ranging from 10s to 1000s of birds for these species). In this case, Natural England also requested further information to be brought to bear in screening the likely significant effects of this impact prior to accepting the current shadow HRA. Here, a central issue revolves around the minor effect of a slight increased length of OHLs present post-works versus determining when and for how long both the existing lines are up at the same time as the new lines and towers. This information is needed to more accurately estimate what the mortality effects may be within the screening process, and which may result in the need for an appropriate assessment and consideration of mitigation for this impact.* *I believe it could also have been useful to undertake occasional walked transects underneath these lines (e.g. in areas of concentrated bird activity) to monitor actual bird mortality over the non-breeding period, and I would advocate doing so this coming winter if another survey season elapses prior to works*		and/or forage there regularly and in significant numbers, when there is no evidence from on-the-ground surveys to confirm those levels of use. We note Natural England agrees with our conclusion regarding loss of functionally-linked land. Regarding the mortality from overhead line collisions impact pathway, the changes made in response to Natural England comments should address these points. Bird diverters are widely deployed, including on Wildfowl and Wetland Trust Reserves, and advocated/ recognised by Natural England as an effective measure to reduce collisions. However, we note the suggestion of a condition requiring monitoring transects to be undertaken over the non-breeding bird season post-development. Regarding otter survey data, the section on otter has been corrected to match the Otter and Water Vole Survey Report. The available evidence indicates that many of the drains traversing the boundary of the Scheme have the potential to support otter at least for commuting, but no evidence of the species was recorded within the Scheme Site Boundary. Therefore, there is no basis to conclude disturbance would arise.	

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commencing. This would also enable a useful comparison of the positive effects of installing bird diverters and I suggest that the authority could impose a condition requiring equivalent monitoring transects to be undertaken over the non-breeding bird season post-development(e.g. within 5 years of completion of the development) to assess the impact/success of this mitigation measure. *iii. 2.2.3 Otters.- Otter presence was confirmed "within drains that are hydrologically connected to the Scheme" (paragraph 6.5.7, page 54 of HRA) and it follows that watercourses within or nearby to the scheme boundary would provide transit/movement routes for individuals in this area even if otters were not currently found living within the scheme boundaries. Therefore, I do not believe that the temporary, disturbance/displacement effects to otters arising from construction can be screened out as concluded by the HRA and I agree with NE that further information demonstrating the location and density of otters relative to the scheme and construction period should be supplied to justify this conclusion. Otherwise, this impact should also proceed to the appropriate assessment stage.*			
I request a condition requiring the applicants to submit for approval a management plan for the area to be used for ecological mitigation for farmland birds prior to works commencing. Management of this area could take the form of a variety of arable agri-environment options to benefit Skylark, Corn Bunting, Yellow Wagtail, Meadow Pippit, etc., and I strongly recommend the inclusion of skylark patches and pollen/nectar margins into this regime as well as establishing species-rich grassland areas.	Breeding Bird Mitigation	The Applicant acknowledges the request to submit a management plan for approval prior to the works commencing. The details of this area will be included within the Landscape and Ecology Management Plan (LEMP) prepared based upon the detailed design, the requirement for which was specified in the Outline CEMP. Following submission of the Planning Application, the Applicant can confirm that the preferred compensatory habitat within the area illustrated on the Indicative LEMP is permanent set-aside (as opposed to an alternative spring cereal cropping rotation) inclusive of species-rich grassland areas.	GWNC-GIL-SS50-XXXXXX-PLN-ES-000001
Spalding Energy Company (InterGen)			
"On 17 December 2025, InterGen submitted the Consultation Response. In that response – which we ask the Council to read alongside this objection – we set out comprehensively the protections, safety assessments and other commitments we required before construction works could proceed in the vicinity of our Pipeline. *In summary, they comprise:* *(i) the execution of formal crossing agreements before works commence;* *(ii) specific protective provisions in any planning permission or consent;* *(iii) full reimbursement of InterGen's reasonable costs and losses (including a binding cost undertaking);* *(iv) the prior provision of detailed engineering, construction-access and traffic-management information; and* *(v) ongoing direct consultation with InterGen.* *A draft Protective Provisions document (the PPs) was sent by InterGen to NGET on 9 January 2026, stating that we would expect this to be agreed and included in any planning consent (whether TCPA or DCO). Despite periodic calls with NGET and their consultants on matters related to this project in recent months,*	Pipeline Protection	The Applicant is in contact with InterGen regarding a crossing agreement to ensure the continued safe operation and maintenance of the pipeline during construction and operation of the Scheme. As referred to above, a plan is enclosed indicating the pipeline route, to the south of the Site. The Applicant's solicitors have asked InterGen to provide its standard draft crossing agreement for consideration. They have also indicated that they will seek the Applicant's instructions to provide a cost undertaking in respect of InterGen's fees, or those of its external solicitors, for negotiating that agreement. The draft protective provisions relate to the Grimsby to Walpole DCO and will be finalised in accordance with the DCO timetable. In advance of that, the crossing agreement would provide the relevant protections for the Scheme.	N/A

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NGET has provided no comments on the PPs and therefore no progress has been made in agreeing these.			
Weston Parish Council			
"The applicant's own Hydraulic Modelling Report confirms that the proposed development relies upon: *• existing River Welland flood defences,* *• sluices,* *• drainage systems,* *• and long-term active flood management infrastructure in order to remain operational throughout its intended design life extending to approximately 2105.* *The modelling explicitly states:* *"Residual flood risk associated with potential defence breach/failure will pose the greatest risk."* *This is a significant admission within the applicant's own evidence base.* *The proposal therefore does not represent infrastructure located within naturally resilient land, but rather infrastructure dependent upon indefinite engineered intervention and future adaptation measures under increasingly uncertain climate conditions.* *This raises serious questions regarding whether the proposal genuinely accords with:* *• sustainable development principles,* *• climate resilience objectives,* *• and the long-term aims of national planning policy"*	Inappropriate Siting within Floodplain	It is acknowledged that the Scheme is located within defended floodplain, as is the majority of land within the Lincolnshire Fens, including the entirety of Spalding and many other local settlements, given the historic drainage projects which have influenced the hydrology within this area. Based upon engagement with the EA, the Applicant's FRA considers a range of future climate change scenarios and sensitivity testing of a potential breach of the River Welland flood defences. This is not an omission within the Applicant's evidence base, rather the FRA explicitly considers this potential scenario and the associated modelling has informed the resilience measures included within the Weston Marsh Substation A design, as described below.	GWNC-WSP-SS50-XXXXXX-RPT-ES-000002
"The applicant's modelling includes: *• 0.1% AEP plus Upper End climate change scenarios,* *• breach modelling,* *• overtopping analysis,* *• and H++ sensitivity testing extending to 2105.* *This demonstrates that:* *• severe future tidal flood risk,* *• residual breach risk,* *• and climate uncertainty* *are central to the proposal.* *The development appears fundamentally reliant upon assumptions regarding:* *• future sea-level rise projections,* *• continued defence maintenance,* *• future adaptation investment,* *• and operational drainage resilience over a 75-year period.* *Given the rapidly evolving understanding of climate change and coastal flood risk, it is questionable whether sufficient confidence exists to justify locating nationally critical infrastructure in this defended marshland setting."*	Long-Term Climate Change	The flood risk assessment was completed in accordance with National Planning Policy Framework (NPPF) and the associated Flood Risk and Coastal Change Planning Practice Guidance (PPG). NPPF and Flood Risk and Coastal Change PPG provide the definition of flood zones, flood risk vulnerability classifications, flood risk compatibility, the requirements for FRAs, the application of the sequential test and the exception test and appropriate allowances for the anticipated effects of climate change. The EA Climate Change Allowances for Flood Risk Assessments guidance was used to determine appropriate climate change allowances for the FRA, which were also further informed by pre-application engagement with the EA. The guidance provides allowances for the projected increases in peak river flow, peak rainfall intensity, sea level rise, and offshore wind speed and extreme wave height. The FRA has demonstrated that the Scheme would be resilient to a range of future climate change scenarios and potential breach events and model projections have informed the design. The 0.1% annual probability event (1 in 1000yr) defence overtopping scenario plus Upper End climate change allowance 2105 epoch was modelled and demonstrated that the substation location is not at risk of flooding in this event. A number of scenarios assessing breaches of the River Welland flood defences were then simulated for the 0.1% annual probability plus Upper End climate change event, in order to determine whether a breach could lead to flooding of the proposed substation site. The worst-case breach scenario was then adopted as the design basis for specifying flood mitigation measures for the substation, with the platform level for the substation being set 300mm above the modelled peak water level. After consultation with the EA, a sensitivity test was also undertaken which applied the H++ climate change allowance to the 0.1% annual probability event plus defence breach scenario, applying a 1.9m sea level rise to the year 2100 from the year 2000. This sensitivity test demonstrated that the development would also be resilient in this event, with 190mm freeboard between the maximum modelled water level and the platform level.	GWNC-WSP-SS50-XXXXXX-RPT-ES-000002

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		National Grid is therefore confident that an appropriately conservative range of assumptions have been adopted to define the design platform level for the substation, which account for uncertainty in the trajectory of climate change impacts on flood risk during the operational lifetime of the substation. In addition, the preliminary drainage design presented within the Surface Water Drainage Strategy has taken account of future climate change allowances, including projected increases in rainfall intensity, to inform the proposed surface water management strategy for the anticipated operational lifetime of the development.	
"The application raises significant concerns regarding long-term public infrastructure dependency. *The site is only viable because of the continued operation and maintenance of:* *• tidal flood embankments,* *• drainage channels,* *• pumping systems,* *• sluices,* *• and wider flood management infrastructure maintained by public bodies and drainage authorities.* *However, the application does not appear to demonstrate:* *• how future adaptation costs will be funded,* *• whether National Grid will contribute toward future defence upgrades,* *• or how resilience obligations will be secured over the full operational life of the scheme.* *This creates a serious concern that the proposal externalises long-term climate adaptation dependency onto:* *• public flood defence systems,* *• Internal Drainage Boards,* *• the Environment Agency,* *• and ultimately future taxpayers.* *The proposal therefore risks creating substantial long-term public infrastructure obligations extending far beyond the initial development phase."*	Long-Term Public Infrastructure Dependency and Adaptation Burden	The EA's Welland flood defences provide flood protection to a wide range of sensitive receptors in the wider area, including the towns of Spalding and Holbeach, smaller rural communities, and existing critical infrastructure assets such as trunk roads, railway lines, energy and water and sewerage infrastructure. In addition, the land drainage infrastructure provided by South Holland IDB facilitates continued use of some of the most productive arable and horticultural land in the UK. There are therefore many important drivers for the ongoing maintenance and development of public flood defence and drainage infrastructure in this region which are independent of whether the Proposed Development proceeds. Irrespective of the future trajectory of flood risk and drainage management in the area, as the commentary in the previous response has demonstrated, the substation platform level has been specified to ensure that no flooding occurs even under the worst case tidal flood defence breach scenario, with the credible maximum H++ sea level rise allowance applied. Therefore, National Grid is confident that the flood protection for the site has been secured through measures incorporated into the design of the substation itself which are independent of third-party flood defence and drainage infrastructure.	GWNC-WSP-SS50-XXXXXX-RPT-ES-000002
"The development risks creating long-term infrastructure "lock-in" within defended tidal floodplain land. *Once nationally significant electricity infrastructure is established within this location, future public authorities may become effectively obligated to continue defending and adapting this area indefinitely regardless of future climate realities, economic viability or wider adaptation strategy.* *This could:* *• constrain future flood management policy,* *• reduce flexibility for future adaptation or managed realignment approaches,* *• and embed escalating public resilience obligations into the future.* *This concern is particularly relevant given increasing national recognition that some defended lowland coastal and tidal landscapes may face growing long-term adaptation challenges under accelerating climate change."*	Infrastructure "Lock-in" and Long-Term Strategic Unsuitability	As noted above, the substation has been designed to be resilient to flood risk under conditions when the Welland defences are breached over the proposed lifetime of the development, taking climate change impacts into account. National Grid has a statutory obligation to provide a secure and resilient national electricity transmission network. As part of this, there is an ongoing programme which reviews flood risks at all its primary substations and retrofits additional resilience measures to address emerging flood risk issues. The Weston Marsh Substation A would be brought into this programme, and implementation of any additional future climate adaptation requirements would be the sole responsibility of National Grid. Therefore, National Grid is confident that the Proposed Development will not place any additional constraints or obligations on the future development of public flood risk management policy in the wider area.	GWNC-WSP-SS50-XXXXXX-RPT-ES-000002

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"The proposed development would industrialise a highly open and visually sensitive fenland landscape. *The submitted plans confirm:* *• gantries up to 15m high,* *• extensive engineered compounds,* *• substantial security fencing,* *• permanent lighting infrastructure,* *• raised platforms,* *• hardstanding areas,* *• access roads,* *• and ancillary infrastructure across approximately 10.6 hectares.* *The associated security infrastructure includes:* *• 2.4m palisade fencing,* *• electric fencing systems,* *• anti-burrow concrete structures,* *• and extensive galvanised security infrastructure.* *This represents a substantial industrialisation of an open marshland environment.* *Due to the exceptionally flat and exposed character of the surrounding fenland landscape, the proposed mitigation planting is unlikely to adequately reduce long-distance visual impacts."*	Landscape and Environmental Harm	A Landscape and Visual Appraisal has been submitted in support of the Scheme, which considers the presence of the Scheme in its entirety within the existing environment. The assessment concludes that any impacts as a result of the Scheme to landscape character, community areas, and recreational routes and receptors would be minor adverse at worst at operational year 15, with many impacts assessed as negligible at year 15. In assessing the impacts of the Scheme upon local landscape character, the existing context is taken into account, which includes major electricity transmission infrastructure in the form of the existing 4ZM and 2WS overhead lines. Given that the Weston Marsh Substation A would introduce a new component of transmission infrastructure, extensive screening planting as illustrated on the Indicative LEMP has been included within the Scheme to mitigate impacts upon landscape character and views. The Scheme has been designed to avoid sensitive receptors as far as practicable. This is in accordance with the 'Holford Rules' applicable to routeing of new overhead lines and the 'Horlock Rules', which apply to the design and siting of Substation Works. Principles include, but are not limited to, seeking to avoid areas of highest amenity, cultural or scientific value, taking advantage of natural screening provided by existing landform and features (e.g. woodland) and keeping visual, noise and other environmental effects to a minimum. Locating the new Weston Marsh Substation A close to the tee point between existing 400 kV overhead lines reduces the amount of new overhead line required, reducing the spread of new infrastructure within the landscape and views. The locations of access tracks and bellmouths has minimised loss of vegetation, reducing the loss of existing vegetation which in turn would help to screen and filter views of the Scheme. Proposed planting as additional mitigation has taken regard of the local landscape, introducing woodland belts to mimic existing such as that along Lord's Drain and focussing on screening and filtering views from the closest visual receptors so that the landscape remains as open as possible.	GWNC-GIL-SS50-XXXXXX-RPT-ES-000001 GWNC-GIL-SS50-XXXXXX-PLN-ES-000001
"The development must also be considered cumulatively alongside: *• wider National Grid reinforcement projects,* *• offshore wind connection infrastructure,* *• overhead line works,* *• and other energy infrastructure developments across the region.* *The cumulative effect risks progressive industrialisation of the fenland landscape and increasing pressure upon environmentally sensitive and highly engineered drainage systems."*	Cumulative Effects	A Cumulative Effects Assessment Report was submitted with the Planning Application based upon pre-application engagement with SHDC. This assessment considered the Scheme in its entirety alongside a long list of other committed developments within a maximum radius of 20 km (depending on development category) of the Scheme. 19 other existing and/or approved developments were included in the short-list and potential cumulative effects assessed in further detail. This short-list included infrastructure intended to connect to the Weston Marsh Substation A. Therefore, the Applicant considers the cumulative effects of the Scheme have been assessed and reported as part of the Planning Application. The assessment concluded that the Scheme is not likely to result in significant cumulative effects above and beyond those already reported for the Scheme and the other existing and/or approved developments in isolation. As set out within the Planning Design and Access Statement, the Scheme in its totality is a standalone development to enable connection of the ODOW Farm to the national electricity transmission system. The Scheme would fully function as part of the national electricity transmission system (NETS) and is not dependent on any additional infrastructure proposed as part of the Grimsby to Walpole Project DCO application. The Scheme is not an NSIP and is therefore subject to consent via the TCPA process.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000020 GWNC-ARU-SS50-XXXXXX-RPT-CP-000002
"The submitted hazard mapping demonstrates that breach scenarios could result in flood conditions categorised as: *• "Dangerous for some,"* *• "Dangerous for most,"* *• and "Dangerous for all."* *The application therefore demonstrates not only flood probability concerns, but potentially severe flood consequence risks associated with defence failure scenarios.* *This is particularly concerning given the critical national role of the proposed infrastructure.* *In conclusion, we believe the proposed development represents an unsustainable and strategically inappropriate location for nationally critical electricity infrastructure.*	Flood Consequence and Residual Risk	It is important to understand that the flood hazard results from the modelled breach scenarios arise largely from the breaches themselves, and would be similar irrespective of the presence of the Weston Marsh Substation A. It was acknowledged in the FRA that there was a minor additional displacement effect arising from the presence of the substation platform under a worst-case breach scenario, but that these effects were largely restricted to small increases in flood level on agricultural land which would have flooded anyway (less than 100mm). Effects at surrounding residential property receptors were assessed in detail and very small increases in level at two properties were predicted by the breach modelling with the substation in place (6mm and 10mm, respectively), with no increase in flood hazard (which remained "very low"). It was agreed with the EA in pre-application engagement that no additional mitigation would be required for these minor changes, in the context that this was a very low probability, residual risk scenario. As has been made clear in previous responses, flood resilience has been incorporated into the substation design, so that it is protected from a worst-case residual risk scenario with maximum credible climate change allowance over the projected lifetime of the development. Furthermore, a drainage	GWNC-WSP-SS50-XXXXXX-RPT-ES-000002 GWNC-WSP-SS50-XXXXXX-RPT-ES-000006

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The applicant's own evidence demonstrates: *• dependency upon defended tidal floodplain systems,* *• residual catastrophic flood risk,* *• long-term climate uncertainty extending to 2105,* *• and reliance upon indefinite engineered intervention and future adaptation measures.* *The proposal risks embedding substantial future public infrastructure dependency and climate adaptation burden into an increasingly uncertain future environment.* *While national energy infrastructure is clearly required, nationally significant infrastructure should, wherever possible, be located in areas that are inherently resilient rather than dependent upon perpetual engineered defence and long-term public adaptation obligations.* *Furthermore, the application raises serious concerns regarding long-term financial sustainability and potential public infrastructure burden over the operational life of the development.* *The applicant's own evidence confirms that the site will remain fundamentally dependent upon externally maintained flood defence and drainage systems throughout its intended lifespan to approximately 2105, including tidal embankments, sluices, drainage channels and wider flood management infrastructure associated with the River Welland system.* *However, the application does not appear to provide any clear assessment of the long-term public financial implications associated with maintaining and adapting these wider flood resilience systems under future climate change conditions. Nor does it demonstrate whether National Grid will contribute toward future flood defence upgrades, increased pumping requirements, emergency breach response capability or long-term climate adaptation expenditure that may become necessary to sustain the viability of the site.* *Given:* *• the acknowledged residual breach risk,* *• the requirement for modelling to 2105 under Upper End climate change scenarios,* *• and the increasing financial pressure already facing national and local flood defence systems,* *there is a legitimate concern that the proposal may create substantial long-term dependency upon publicly maintained flood infrastructure and future taxpayer-supported adaptation measures.* *In the context of nationally significant infrastructure, it is reasonable to question whether this represents an appropriate, resilient and economically sustainable site selection strategy when alternative locations may avoid embedding long-term public climate adaptation liabilities within defended tidal floodplain land.* *The Council and decision-makers should therefore require:* *• a full whole-life climate resilience and adaptation cost assessment,* *• clarification regarding future funding responsibilities especially when existing funding is being cut,* *• and legally enforceable commitments ensuring that future public*		strategy has been developed for the substation which ensures that runoff from the site will be limited to greenfield runoff rates for the lifetime of the development, including allowance for climate change impacts on rainfall rates. The Scheme is therefore not dependent for flood risk protection on any third-party flood management infrastructure, nor are there any flood risk impacts arising from it which places an additional burden on third party drainage infrastructure. National Grid has a statutory obligation to ensure the ongoing resilience of its infrastructure, and will continue to ensure that the substation remains resilient to flooding over its operational lifetime. This commitment is independent of the future development of public flood risk management policy in the wider area. There is therefore no additional financial burden placed by the Proposed Development on flood risk management authorities.	

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authorities, drainage boards and taxpayers are not left carrying disproportionate long-term financial burdens associated with maintaining the continued operational viability of the development (estimated £18.75m over current funding)."			
Wigwam Holidays			
"Unlawful Project Fragmentation (Split Consenting): National Grid's documents admit that this substation cannot function alone and is part of a wider 400 kV network upgrade required to connect the Outer Dowsing Offshore Wind Farm. Artificially splitting the project into a Town and Country Planning Act (TCPA) application to bypass a unified Nationally Significant Infrastructure Project (NSIP) Development Consent Order (DCO) violates the Planning Act 2008. It deprives the public of a transparent, comprehensive assessment of cumulative impacts"	Cumulative Effects / Salami Slicing	The Outer Dowsing Offshore Wind Farm DCO application has been determined. Approval was granted by the Secretary of State on 10 February 2026. As identified in the updated PDAS (Doc Ref xxxxx, Section xx paras xxx – xxx) the principle for grid connection infrastructure to be provided in the vicinity of the Spalding Tee Point has already been considered and accepted in the ODOW DCO examination and the decision. As also set out within the Planning Design and Access Statement, the Scheme in its totality is a standalone development to enable connection of the ODOW Farm to the national electricity transmission system. The Scheme would fully function as part of the national electricity transmission system (NETS) and is not dependent on any additional infrastructure proposed as part of the Grimsby to Walpole Project DCO application. The Scheme is not an NSIP and is therefore subject to consent via the TCPA process. A Cumulative Effects Assessment Report was submitted in support of the Planning Application based upon pre-application engagement with SHDC. This assessment considered the Scheme in its entirety alongside a shortlist list of other committed developments within a maximum radius of 20 km (depending on development category) of the Scheme. 19 other existing and/or approved developments were included in the short-list and potential cumulative effects assessed in further detail. This short-list included infrastructure intended to connect to the Weston Marsh Substation A. The Applicant considers the cumulative effects of the Scheme to have been assessed and reported as part of the Planning Application in accordance with best practice assessment guidelines. The assessment concluded that the incremental changes which would result from Scheme are not likely to result in significant cumulative effects when considered in combination with other existing/and or approved developments. That is, that the Scheme would not result in any significant environmental effects over and above those already reported for the Scheme and the other existing and/or approved developments in isolation. This includes those assessed within the ODOW Farm Environmental Statement submitted in support of the DCO and considered during the subsequent examination for this project.	GWNC-ARU-SS50-XXXXXX-RPT-CP-000002 GWNC-ARU-SS50-XXXXXX-RPT-ES-000020
"Severe Highway Safety Risks and Infrastructure Damage: The proposed 5 year construction period will bring over 100 HGV movements per day onto narrow, single-carriageway rural lanes like Seasend Road, Broadgate Road, and Wraggmarsh Road. These roads are built on unstable peat/silt subsoil and completely lack pedestrian footpaths. The 06:00–08:00 construction arrival windows directly overlap with critical school-run and commuter traffic on the A151, threatening the safety of children travelling to local schools and patients accessing the Moulton GP practice"	Highway Safety / Residential Amenity	In response to the comments raised at the targeted consultation in November 2025, construction traffic has now been redirected onto Stone Gate. Construction traffic for this Scheme would be limited to A51, Stone Gate and Marsh Road only, with Marsh Road being used for worker traffic only. It is not proposed to use Seasend Road Broadgate Road and Wraggmarsh Roads. The roads are currently built on unstable peat/silt, therefore, at access points, interventions and changes to the highway are proposed, along with a road safety audit to be undertaken at each of these. Any changes will be agreed in consultation with the highway authority. The application proposes a 06:30 hrs-20:00 hrs construction traffic window. The likely impacts on the local roads have been identified in the Transport Statement and it is proposed that this will be controlled by a CTMP. Highway interventions on Stone Gate are proposed to make it suitable for two-way flows of HGVs onto the haul Road. Schools: There are two schools in the vicinity, at Weston and Molton. The Scheme would not interact with the roads in either of these areas. The Highway Authority has reviewed the Outline CTMP and accepts that the increases to vehicle movements is acceptable in terms of highway operations. Moulton GP practice: Construction HGVs and LGVs are routed via A16, A151, Stone Gate and the haul road. Workers cars/vans will travel on the wider road network and include trips on Marsh Road West and in Spalding. Limited trips through Moulton and Weston are anticipated. In the peak year of construction there are forecast to be 55 HGVs, 150 LGVs and 60 construction workers cars/vans daily. HGVs will arrive and depart throughout the day. LGVs and Workers cars/vans	GWNC-ARU-SS50-XXXXXX-RPT-ES-000018

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		will arrive in the morning and leave in the evening, further details and figures are provided in the Transport Statement. Only 6 HGV movements hourly are forecast in the typical network peaks (8-9 and 17-18) as well as at the end of the school day (15-16).	
"Failure to Account for Local Population Growth: National Grid's traffic and socio-economic baseline data is completely outdated. It fails to model the cumulative impacts on an expanding community, entirely ignoring the approximately 200 new homes built in Weston between Autumn 2024 and Spring 2026. This growth has already increased the baseline traffic and pressure on rural infrastructure"	Population Growth	Data on future population growth is sourced from population projections produced by the Office for National Statistics (ONS) at a local authority level. These projections provide the most robust and consistent estimate of future demographic change across the study area and are considered appropriate for assessing the future baseline as they are produced using a nationally recognised methodology and reflect expected changes in births, deaths and migration over time. Whilst local authority-level projections may not fully capture the latest changes within individual settlements, they provide a robust basis for understanding population growth and wider demographic trends across the relevant district and regional geographies. Baseline traffic conditions and assessment is provided in the Transport Statement, which includes consideration of planned and committed developments. Engagement with the local highway authority to agree the approach to assessment was conducted prior to submission of the Planning Application.	GWNC-ARU-SS50-XXXXXX-RPT-ES-000018
"Flood Risk and Sequential Test Failure: The site sits entirely within Flood Zone 3. Under the National Planning Policy Framework (NPPF) and Local Plan Policy LP14, major industrial developments must pass the Sequential Test by proving no alternative lower-risk sites exist. The applicant has failed to provide a rigorous district-wide site selection analysis, making approval a clear breach of flood risk policy"	Sequential Test Failure	Section 8 of the FRA submitted in support of the Planning Application applies the sequential and exception tests required under the NPPF. 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 and 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 CPRSS prepared in support of Stage 1 consultation to provide the public and stakeholders with technical information on the project, needs case, options considered and routeing and siting options assessed and a preferred route. 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. Having applied the sequential test, it was demonstrated that it is not possible for the new Weston Marsh Substation A to be located in an area with a lower risk of flooding from rivers and the sea, and therefore the exception test was applied. The exception test, as defined by Paragraph 31 of the PPG Flood risk and coastal change guidance requires that: *a). the development would have wider sustainability benefits to the community that outweigh flood risk; and* *b). the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.* In response to requirement (a), the wider sustainability benefits of the development are that the proposed Scheme would help to replace parts of the electricity transmission network which were developed in the 1960s and currently offer limited ability to support planned connections (to new generation) on the east coast. In response to requirement (b), hydraulic modelling predicts that the proposed Weston Marsh Substation A would not be at risk of flooding from tidal sources in the design flood event; the 0.1% annual probability plus Upper End climate change (2105 epoch) over its predicted 75 year design life. There is a residual risk to the location of the proposed Weston Marsh Substation A in the 0.1% annual probability plus Upper End climate change (2105 epoch) breach scenario. The proposed substation has been designed to remain operational and resilient in this scenario, by being set on a raised platform providing a minimum freeboard of 300mm above predicted flood levels in this scenario, in compliance with National Grid Technical Specifications (2.10.13) and the EA South East Lincolnshire flood risk standing advice. This would also provide mitigation and resilience against the residual risk of fluvial flooding from IDB managed watercourses in the event of infrastructure failure. Off-site impacts as a result of the above mitigation are minor, with a negligible impact on flood hazard at identified receptors. This conclusion was agreed with the EA in pre-application consultation in March 2026.	GWNC-WSP-SS50-XXXXXX-RPT-ES-000002

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		Therefore, the information presented above and in Section 8 of the FRA demonstrates that the exception test has been passed.	
"Irreversible Destruction of Grade 1 Farmland: The development permanently industrializes and sterilizes Grade 1 silt soils among the most productive, finite agricultural resources in Britain. Furthermore, the underpinning Agricultural Land Classification (ALC) survey was flawed, being conducted during saturated conditions contrary to Natural England guidance, creating an unreliable baseline. "	Loss of BMV	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 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. 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. It is acknowledged the Scheme will result in the permanent loss of 19.69 ha of Grade 1 best and most versatile agricultural land. This has been assessed as a significant effect due to the very high sensitivity of the Grade 1 land. However, this loss represents 0.03% of land classified as Provisional Grade 1 land in Lincolnshire. This calculation is based on the 75,757 ha of Provisional Grade 1 land in Lincolnshire as defined by MAFF (1983)[8]. All soils permanently disturbed would be reused on site where practicable, with all soil handling undertaken in line with published good practice as set out in the Outline Soil Management Plan. The area comprising the Scheme footprint was surveyed over a number of survey phases between September 2025 and June 2026 (due to access permissions and design changes). The survey was undertaken in accordance with the published guidelines where the physical properties of the soil are described and recorded to a depth of 1.2m below ground level (where possible). The description covers soil texture and structure along with other characteristics. Soil texture will not change with soil water content (as it comprises an assessment of the proportions of sand, silt and clay within the soil). Soil structural characteristics may vary to some extent with soil water content, especially where there are clays with shrink/swell characteristics. However, as the surveys were undertaken over a period of time, covering autumn, winter, spring and early summer, and as no factors were identified which resulted in a reduction in ALC grade from the highest quality land, it is not considered that the survey was flawed or that the baseline is unreliable on the basis of any variability on weather of ground conditions. ALC surveys are undertaken across the autumn, winter and spring periods (when ground is softer and crops lower in height) as a standard across the profession. In addition, the Predictive ALC map recently published by Defra shows a predominance of Grade 1 land in this area, but with some Grade 2 and Grade 3a land predicted. As such, the survey, which should be relied upon for site-specific assessments, provides confirmation of the higher grade land across the whole area compared to the Predictive mapping now available, and this has been used to inform the assessment.	GWNC-ARC-SS50-XXXXXX-RPT-ES-000002 GWNC-ARC-SS50-XXXXXX-RPT-ES-000001 GWNC-ARU-SS50-XXXXXX-RPT-ES-000005 GWNC-GIL-SS50-XXXXXX-RPT-ES-000001 GWNC-ARU-SS50-XXXXXX-RPT-ES-000019 GWNC-GIL-SS50-XXXXXX-PLN-ES-000001
"24/7 Noise Pollution and Landscape Intrusion: The scale of the industrial gantries and structures will visually scar our open fenland, ruining its distinct "Big Skies" horizontal character. Furthermore, the continuous, low-frequency 24/7 tonal hum generated by transformers will shatter the nocturnal tranquillity of our quiet rural environment, causing a substantial loss of amenity to nearby farmsteads"	Noise Pollution and landscape intrusion	A Noise and Vibration Assessment has been prepared for the Scheme, which considers the Scheme in its entirety. The assessment indicates that significant adverse impacts are not expected from the Scheme during either the construction or operational phases where standard mitigation measures are incorporated into the works. Outline noise and vibration mitigation options have been provided indicating how significant adverse effects can be avoided and adverse impacts would be mitigated and minimised during construction. Measures for noise and vibration have been included within the Outline CEMP for the Scheme. With regards to operational noise, the proposed substation would not contain notable noise generating plant items that may be associated with most substations, such as transformers. This is because voltage transformation would be done by the energy generator and the National Grid substation is for connections only and therefore transformers are not required. Therefore, in the absence of such sources, noise generation from the National Grid substation is negligible.	GWNC-ATG-SS50-XXXXXX-RPT-ES-000001 GWNC-GIL-SS50-XXXXXX-RPT-ES-000001 GWNC-GIL-SS50-XXXXXX-VIS-ES-000001 GWNC-GIL-SS50-XXXXXX-PLN-ES-000001

[8] Agricultural Land Classification of England and Wales – The Distribution of the Grades; MAFF (1983) Technical note TN/RP/01 TFS 846.

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		The potential for impacts to landscape have been considered within the Landscape and Visual Appraisal. As this reports, temporary adverse impacts are likely during the construction phase but given the distance between receptors and the main works area and the retention and strengthening of existing vegetation, the effects are not predicted to be significant. The new Weston Marsh Substation A design proposals include extensive planting to provide screening of this new element of infrastructure. These areas are illustrated on the Indicative LEMP. The photomontages submitted in support of the planning application also provide a further illustration of the change in views as a result of the Scheme.	
"As the owner of Wigwam Holidays Crowtree, I have a special interest in the way this development may impact upon my business. Since 2015 we have been offering high quality outdoor accommodation at Crowtree Farm - very close to where subs-station A may be built. The market for such accommodation is now very strong- with up to 90% occupancy in our premium cabins. There is no doubt that my site provides a strong impetuous for tourism in the local area. My concern is that the industrial scale of the project will have a serious impact upon the occupancy levels and therefore may put the business in jeopardy"		National Grid are engaging with this interest directly and have in fact held a recent meeting to discuss potential impacts, mitigation and other matters related to the project. Qualifying interests are entitled to compensation for all reasonable losses suffered as result of the project. National Grid is legally obligated to ensure affected parties get the compensation they are entitled to under legislation. National Grid will also ensure there is provision for effected parties / qualifying interests to take professional advice without being burdened by the associated costs, National Grid understand and value the importance of parties being able to take independent professional advice on matters relating to CPO / Compensation. Government also provides for guidance / advice within a series of published documents on its website. Links: https://www.gov.uk/government/publications/compulsory-purchase-process-guidance https://www.gov.uk/guidance/compulsory-purchase-and-compensation-guide-2-compensation-to-business-owners-and-occupiers#compensation-when-land-taken	N/A

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Appendix B Response to comments that the Scheme forms part of the Grimsby to Walpole DCO Project

Responses listed in Appendix A, above have raised concerns that the Scheme should be included within the Grimsby to Walpole Development Consent Order (DCO), and that the use of separate consenting regimes represents an inappropriate division of infrastructure.

The submission demonstrates that the Scheme constitutes a standalone project with a distinct purpose, programme and operational function. The Scheme is being promoted solely to facilitate the connection of the consented Outer Dowsing Offshore Wind Farm (ODOW) to the Transmission System by 2030 through the delivery of Weston Marsh Substation A and the associated overhead line works. The application confirms that these works can be delivered, operated and justified independently of the Grimsby to Walpole DCO and would proceed regardless of whether the DCO is consented or delayed. Accordingly, the Scheme has a separate and time-critical needs case which exists independently of the DCO.

The use of different consenting routes reflects the statutory framework governing the individual infrastructure components rather than any attempt to avoid environmental scrutiny. The substation is appropriately consented under the Town and Country Planning Act (TCPA) 1990, whilst the length of the overhead line works falls below the Planning Act 2008 threshold for Nationally Significant Infrastructure Projects and has therefore been correctly progressed under Section 37 of the Electricity Act 1989.

The consenting approach therefore follows the legislative requirements applicable to each element of development. Furthermore, the environmental assessment has not been undertaken in isolation. The screening and environmental assessment work has considered the Scheme as a whole - including the interrelationship between the Substation Works, Section 37 works and exempt works - together with cumulative effects arising from other committed developments.

Relevant case law concerning project definition for EIA purposes includes *Wingfield v Canterbury City Council*, *Ashchurch Rural Parish Council) v Tewkesbury Borough Council* and *Together Against Sizewell C Ltd v Sizewell C*.

This case law consistently holds that the question of what constitutes a single "project" for EIA purposes is a matter of planning judgment, requiring consideration of the facts and circumstances of each case. In *R (Wingfield) v Canterbury City Council*, the Court identified a number of relevant factors, including common ownership, timing of determination, functional interdependence, whether developments are capable of proceeding independently, and the treatment of cumulative effects. These principles are endorsed by R (*Ashchurch Rural Parish Council) v Tewkesbury Borough Council*, in which the Court emphasised the need to assess whether works form an integral component of a wider development project. In *Together Against Sizewell C Ltd*, it was confirmed that physically or operationally related developments do not necessarily constitute a single EIA

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project where they have distinct purposes, can be promoted and consented separately, and are capable of functioning independently. Collectively, these demonstrate that common ownership or geographical proximity alone are insufficient to establish a single project, and that cumulative environmental effects can be addressed through cumulative assessment without requiring separate developments to be treated as one project.

Applying the factors identified in those judgments, National Grid considers that the Scheme and the Grimsby to Walpole DCO do not form a single project. While both are promoted by National Grid and are geographically related, they will be submitted and determined through separate processes, serve different purposes, and are not functionally interdependent.

Most importantly, the Scheme remains capable of operating as a fully functioning and complete development without any reliance on the delivery of the Grimsby to Walpole DCO. It is therefore concluded that the appropriate response to any overlap between the projects is the assessment of cumulative effects, rather than treating them as a single project for consenting or EIA purposes.

The Scheme is a standalone project requiring separate consents and that the use of the pursued consenting regimes is both lawful and proportionate. The approach reflects the statutory requirements for each infrastructure element, ensures the timely delivery of the ODOW connection by 2030 in line with the Clean Power 2030 Action Plan objectives, and provides a robust framework for the assessment of environmental effects and cumulative impacts.