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Our ref: PREAPP/22/00456

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29<sup>th</sup> March 2023

Dear Ms Powis,

**The Yorkshire Green Energy Enablement (Green) NSIP by National Grid Electricity Transmission Plc.**

Leeds City Council is a registered Interested Party in relation to the above Development Consent Order application. We are also defined as a Local Authority under section 56(a) of the Planning Act 2008 ("The Act") as the application land is within the Authority's area.

Under section 60(2)(a) of The Act, you have kindly provided notice in writing inviting Leeds City Council to provide a Local Impact Report on the above Development Consent Order application to assist examination.

Section 60(3) of The Act identifies that a Local Impact Report is a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area).

Please find this report attached.

Kind regards

[REDACTED]

David Feeney

Chief Planning Officer  
Planning and Sustainable Development  
Leeds City Council.

## National Infrastructure Project Development Consent Order application – Local Impact Report

Planning Act 2008, section 60(2)(a)

### The Proposal

To upgrade and reinforce the high-voltage power network by:

#### New Infrastructure:

**Section B** (North/West of York): reconductoring of 2.4km of the 400kV of the Norton to Osbaldwick overhead line and replacement of one pylon on this overhead line; building a new 400kV overhead line, north of the proposed Overton Station; building two new 400kV sealing end compounds and approx.230m of underground cabling; building two new section of 275kV overhead line, connecting into Overton Substation; and, works to 5km of the existing XCP Poppleton to Monk Fryston overhead line between Moor Monkton and Skelton.

**Section D** (Tadcaster/ Bramham Area): building two new 275kV cable ceiling end compounds installed approx. 3km south-west of Tadcaster and north-east of the A64/ A659 junction where two existing overhead lines meet; and, replacement of one existing pylon on the existing 275kV Tadcaster to Knaresborough (XD) overhead line.

**Section F** (Monk Fryston Substation Area): building a new substation located east of the existing Monk Fryston Substation; realigning a 1.45km section of the 275kV Poppleton to Monk Fryston (XC) overhead line, to connect into the new substation; and, reconfiguring the existing 4YS 400kV Monk Fryston to Eggborough overhead line, to connect into the new substation.

#### Existing Infrastructure:

**Section A** (Oswaldwick Substation): Installation of a new circuit breaker and isolator with associated cabling, removal and replacement of one gantry and works to one existing pylon.

Reconductoring work along the existing 275kV Poppleton to Monk Fryston XC overhead line across two areas:

**Section C** (between Moor Monkton and Tadcaster) and **Section E** (between Tadcaster and Monk Fryston): upgrade works including replacement of exiting overhead line conductors, replacement of pylon fittings, strengthening of steelwork and works to pylon foundations. These works would take place north and south of Tadcaster.

### The Applicant

National Grid Transmission Plc

### Strategic Impacts

Green Belt; Landscape and Visual Impact; Archaeology; Disturbance; Traffic and Transport; Agricultural Land; Gas Networks; and, Biodiversity.

## Context

- 1 National Grid has submitted a Development Consent Order to the Planning Inspectorate (PI) for the proposal outlined above. Section 60(2)(a) of the Planning Act 2008 (“The Act”) sets out that the PI is required to invite a Local Authority to submit a Local Impact Report, giving details of the likely impact of the proposed development on the authority’s area. Leeds City Council is a Local Authority under section 56(a) of The Act as the application land is within the Authority’s area.
- 2 The proposed development covers several Local Authority areas in West and North Yorkshire. ‘Section D’ of the proposal, as identified above, is located within the Leeds administrative district, and overlaps with proposed works within the neighbouring Selby administrative district. Other than for any transboundary issues of significance, this report focusses only on the proposed areas and works within the Leeds district, falling within the scope of Section D, as shown in Fig. 1 below.



**Fig 1: Proposed development in Leeds, showing district boundary with Selby.**

## Site Description

- 3 The applicants Figure 8.2 (drawing ref. 806503-WOOD-0270) identifies the proposed land within the Leeds administrative authority. The land consists largely of open countryside, forming part of Bramham Moor and is located within the defined Leeds Green Belt. The site falls within the parish of Bramham-cum-Oglethorpe Parish Council and is within the constituency of Elmet and Rothwell.

- 4 The application site consists of an existing 275kV overhead electricity line carried on lattice steel towers for an approximate distance of 960m within the Leeds district, with the remaining 1,260m passing through the Selby district. The towers are typically 38m in height with a base size of 7.5m<sup>2</sup> - 11.3m<sup>2</sup>.
- 5 A short distance south of the proposed site is an existing electricity substation at Headley Plantation. The plantation comprises tall, dense broad-leafed woodland to the south of the substation complex and along large parts of the western, northern, and eastern boundaries.
- 6 The nearest residential properties and Headley Hall are located approximately 230m to the south east off Warren Lane and Spen Common Lane. Properties to the north east are located approximately 200m away. The active Highmoor Quarry off Warren Lane is located approximately 440m northeast of the proposed site. Isolated dwellings are located approximately 1km to the east, off Paradise Way and Aberford Road, with Bramham Village located some 800m north-east with its multiple Listed heritage assets. The grade II Listed Bowcliffe Hall lies south of Bramham on the western side of the A1(M), with the grade I Listed Bramham Park beyond. The proposed site is located approximately 2 miles from the nearest junction with the A1(M). Highway connections within the proposed site's vicinity are generally rural, narrow and of poor quality.

## **Planning History**

- 7 Application ref. 06/00769/N1490: diversion of part and construction of new 275Kv overhead electricity line carried on towers from grid reference 44128-42075 to 45073-41915 off Warren Lane, Bramham, Wetherby, Leeds. Approved.

## **Local Planning Policy:**

- 8 The adopted development plan for Leeds consists of:
  - Leeds Site Allocations Plan (adopted 2019, and subsequently amended by High Court decision 2020);
  - Leeds Core Strategy 2014 (amended by the Core Strategy Selective Review 2019);
  - Leeds Natural Resources and Waste Local Plan adopted 2013 & revised 2015;
  - Saved policies of the Leeds Unitary Development Plan Review 2006;
  - Leeds Aire Valley Leeds Area Action Plan 2017; and,
  - Any Made Neighbourhood Plan

The adopted development plan policies of relevance to the proposal in Leeds are:

- 9 [Leeds Site Allocations Plan](#) policies:

Outer North East Housing Market Characteristic Area: Land is defined as Green Belt. The originally proposed housing allocation MX2-33 (Headley Hall), which covers the proposed site, was withdrawn by the landowner in 2015 and is therefore not of relevance to the proposal.

- 10 [Leeds Core Strategy 2014](#) policies:

P10: Design  
P11: Conservation

P12:	Landscape
T2:	Accessibility requirements and new development
G2:	Creation of new tree cover
G8:	Protection of important species and habitat
G9:	Biodiversity Improvements
EN1:	Climate change - Carbon Dioxide reduction
EN2:	Sustainable design and construction
EN3:	Low carbon energy
EN5:	Managing flood risk
ID2:	Planning obligations and developer contributions.

11 [Leeds Natural Resources and Waste Local Plan](#) policies:

Air 1:	Aire Quality
Water 1:	Water efficiency
Water 2:	Protection of water quality
Water 6:	Flood Risk Assessments
Water 7:	Surface water runoff
Land 1:	Contaminated land
Land 2:	Development and Trees

12 [Saved policies of the Leeds Unitary Development Plan](#) policies:

GP5:	Detailed planning considerations
N29:	Archaeology
N32:	Green Belt and the Proposals Map
N33:	Development in the Green Belt
N35:	Agricultural Land (B&MV)

13 [Bramham Cum Oglethorpe Neighbourhood Plan \(2018 – 2033\)](#) policies:

H2:	Bramham Moor Battlefield; identified on Map 8 is nominated for assessment by Leeds City Council as a potential Non-Designated Heritage Asset.
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**Leeds adopted Supplementary Planning Documents:**

14 [Transport SPD](#).

**Strategic Impacts:**

**Green Belt**

- 15 The site is located within the defined Leeds Green Belt, which provides separation from other administrative districts, including Selby and North Yorkshire. The application states that the proposed cable ceiling end compounds at Tadcaster, the reconductoring works and the new Monk Fryston Substation would fall within the Leeds Green Belt. Whilst this may be the case, only reconductoring with associated development works would take place within the Leeds administrative district. The application states that the reconductoring works to upgrade the existing XC 275kV overhead line within Leeds would not have a greater effect on the Green Belt than the current infrastructure existing within the Leeds Green Belt. We agree with this, other than for where proposed works are required to provide permanent or temporary

highway infrastructure and/ or mitigation. We would recommend that regard should be had to the nature and duration of the predicted disturbance in coming to a view on Green Belt harm. That said, we generally agree that the applicant's very special circumstances as it is considered that the intended positive purpose of the development proposal, as a whole, clearly outweighs the harm to the Leeds Green Belt and, any other harm, subject to the imposition of restrictive planning conditions on any Development Consent Order (DCO) and planning obligations contained in a S106 legal agreement.

## Landscape Character and Visual Impact

- 16 The existing pylons within Leeds are located on Bramham Moor and within the 'Open Arable Farmland' landscape type. Other than for the existing pylons, the existing Bramham substation and scattered private properties, the Moor is enclosed and cultivated, forming a productive area of large regular fields, interrupted by occasional woodland and patches of pasture. The landscape receptor of the Open Arable Farmland Landscape Character Type: East Bramham is illustrated on the applicants **Figure 6.16 (Document 5.4.6)[App-167]** with the detailed assessment contained in **Table 6F.9 of Appendix 6F (Document 5.3.6F)[App-113]**. This concludes a Minor Adverse and Not Significant effect during the construction phase, acknowledging the indirect effects of the temporary pylons in the adjoining West Selby Limestone Ridge Landscape Character Area. During the operational phase the XD001T pylon would be replaced by the XD001 pylon and it is considered that there would be little, if any, potential for visual clutter from pylons and the overall effect from the ~15m taller replacement pylon and CSEC would be Minor/Negligible Adverse and Not Significant.
- 17 The applicants Environmental Statement Chapter 6: Landscape and Visual **(Document 5.2.6)[App-078]** clarifies the landscape and visual receptors with the potential to be affected. This notes that visual clutter from pylons would only be experienced by landscape and visual receptors on the edge of Bramham and on Bramham Moor during the construction phase from the temporary pylons (XD002T and XC481T). We agree with this statement but consider that there may also be opportunity for longer-distance views of the proposals site from parts of the eastern side of Bramham Village.
- 18 Visual effects experienced by residential, recreational and transport receptors are identified on the applicants **Figure 6.20 and Figure 6.21 (Document 5.4.6)[App-167]** and are assessed in detail at **Appendix 6G (Document 5.3.6G)[App-114]**. This includes the settlement of Bramham (Table 6G.59), residents of Wise Warren (Table 6G.65) and Headley Hall and Cottages (Table 6G.66 ). Users of the Paulinus Way (Table 6G.75) are assessed noting the route crosses both Selby District and Leeds City administrative areas and Significant effects are only identified close to the Site along Garnet Lane within Selby District Council administrative area. Views experienced by users of the public right of way between Headley Hall and the A64 are assessed at **Table 6G.73**. In all cases, effects at construction recognise the potential for views of the temporary pylons and the effect upon visual amenity is assessed as Minor Adverse and Not Significant. During the operational phase as the XD001T pylon would be replaced by the XD001 pylon there is predicted to be little, if any, potential for visual clutter from pylons and we agree that the overall effect from the ~15m taller replacement pylon and CSEC in Selby would be Minor Adverse or less and Not Significant on views within Leeds.

## Archaeology

- 19 The existing pylons within Leeds to which Section D relates are located on Bramham Moor. The Moor is bisected west to east by 2 Roman Roads, which were discovered by archaeological investigation on behalf of National Grid, prior to the erection of the existing pylons and/or substation within Leeds. Bramham Moor forms the site of the Battle of Bramham Moor (1408) and is not a registered battlefield but is noted as being at threat from encroachment. The made Bramham Neighbourhood Plan (2018 - 2033) identifies the Bramham Moor Battlefield as a 'valued landscape area', as identified on Map 8 of that Plan. The area covered is recognised for the importance of historic events that took place there rather than for any known remaining physical features (other than for the two Roman Roads). It is recommended that the ExA have regard to the Bramham Neighbourhood Plan during examination and its desire for Bramham Moor to be allocated as a registered battlefield.
- 20 The effects of the proposed development on Bramham Moor is considered in the applicant's **Environmental Statement Chapter 7: Historic Environment** in **paras. 7.32.1 to 7.32.4**. Whilst this identifies that construction works in this area could have significant adverse effects on archaeology, the applicant confirms that a Written Scheme of Investigation (WSI) will be provided to assist in partially mitigating any loss of archaeological interest, leading to a negligible magnitude of adverse change, and resulting in a minor residual effect which is Not Significant. The applicants proposed approach to investigation via a WSI has been agreed by the West Yorkshire Archaeological Advisory Service on behalf of Leeds City Council. We would recommend the ExA to impose this requirement by condition on any DCO.

## Disturbance

- 21 We agree with the Relevant Representations submitted by the other Local Authorities that the proposed development's working hours should be restricted by condition on any consent, to between the following hours: 08:00 -18:00 Monday to Friday and 08:00 - 13:00 Saturdays, and not at any other time. These restrictions are necessary to assist in protecting the living conditions of occupants of nearby property in Leeds, particularly given the duration of the proposal and the noted peaks in associated traffic generation.
- 22 We note the applicant's request for flexibility to allow for occasional out-of-hours working. The applicants **Document 5.2.3, Volume 5** sets out the operations which they wish to carry out 'flexibly' and, this includes for night-time working. The applicants **Document 6.5, Volume 6** states that '*significant effects are unlikely as the duration of such activity is very limited*'. We would recommend that noise assessment findings should not be predicated on the perceived short duration of any 'out of hours' operations, as this suggests that the worst-case noise scenario has not been satisfactorily considered. It is also likely that flare or directional lighting would be required for any 'out of hours' operations and this, combined with noise emissions and potential vehicle movements, would make any extended and nighttime operations appear more apparent to nearby sensitive receptors within Leeds. It is therefore recommended that a flexible approach could lead to public uncertainty and could be unenforceable, undermining the mechanism for restricting working hours, as set out in para. 21 above. On this basis we would recommend that the ExA gives due regard to this issue during examination and restricts working hours by condition on any consent.

## Traffic and Transport

- 23 Leeds City Council maintains the highway for the length of Warren Lane and Spen Common Lane, including the respective junctions with Toulston Lane and Paradise Way. The length of Toulston Lane to the east of its junction with Warren Lane lies outside of the Leeds administrative district. Three separate vehicular accesses (refs. AP36, AP37 and AP38) are proposed on Warren Lane, in the position of existing agricultural field access points. The applicants **Volume 2 Document 2.12.4 Traffic Regulation Order Plan Section D** identifies the location of two separate proposed Traffic Regulation Orders (TR-43 and TR-44) on Warren Lane, to be managed in accordance with section 45 of the draft DCO. HGV routing is proposed via the A1(M)/A64 Junction – Paradise Way – Spen Common Lane – Warren Lane. LGV routing is proposed via the A659 – Unnamed Road North of Garnet Lane – Toulston Lane – Warren Lane. A small 2km section of road (Spen Common Lane/Warren Lane) is required to be used as part of the proposed HGV access strategy.
- 24 The applicant predicts that the duration of construction is likely to take place over 176 weeks, but this could be subject to change, as identified by the applicant at the Issue Specific Hearing on 23<sup>rd</sup> March 2023. The applicant predicts a total of 738 additional trips on Warren Lane and including 376 HGV trips, with week nos. 45-67 likely to be the busiest based on the current submission.
- 25 A highway crossing is proposed on Warren Lane (RD13), to be undertaken using scaffolding and protected crossings of the highway. We agree that this construction method would assist in mitigating disturbance of the public highway during the crossing installation and, would remove the need for shuttle working and road closures during the main construction works. We also agree that traffic management by way of a short rolling roadblock would be needed to install the netting in these scaffolding locations, as part of the proposed Traffic Regulation Orders.
- 26 We agree with the applicants proposed Construction Traffic Management Plan identified at **Volume 5 Document 5.3.3F ES Chapter 3 Appendix 3F**. With respect to paras. 7.310 – 7.3.11 of this document, the City Council consider it necessary for the applicant to carry out Highway Condition Surveys before and after construction for the entire length of Warren Lane, rather than just at the proposed access points, given the narrow and rural nature of the highway. The applicant has agreed to do this, and it is therefore recommended that the ExA have regard and secure this requirement as part of the draft DCO.

## Agricultural Land

- 27 The total area of the proposal within the Leeds administrative area is 6.9ha. Post-1988 survey data identifies that most of the proposed development would be located on/over the Best and Most Versatile agricultural land of Grade 1 (0.33 ha), Grade 2 (2.11 ha) and Subgrade 3a (2.14 ha). A further 2.14ha of the proposal would be on/over Subgrade 3b. The soils in the area are of the Aberford (511a) soil association. As described in the applicants **Environmental Statement Chapter 11: Soils and Agricultural Land (Document 5.2.11 [APP-083])** these are shallow, well drained calcareous fine loamy soils over limestone, they have a small risk of erosion and are of wetness class 1.



28 As the proposed works in Leeds would be temporary, in order to restring existing pylons with the erection of one highway crossing and access to the area beneath the existing pylons, it is considered that the proposal would result in no permanent loss of agricultural land. Best practice soil management and handling measures is proposed to be followed as outlined in the **Soil Management Plan (Appendix 3E, Document 5.3.3E [APP-098])**. An aftercare scheme is proposed to be implemented to ensure that soil resources are full restored upon completion of the works. It is also noted that, where possible, the applicant's agricultural liaison officer will liaise with local farmers to ensure the works are carried out with minimal impact on cropping. It is therefore considered that the effect of the proposal on the agricultural land and soils within Leeds is Not Significant, with the embedded mitigation measures in place.

### Gas Networks and Utilities

29 There are 2 high pressure gas pipelines close to, if not overlapping, the proposed site within Leeds and extending into the Selby district. The line of existing pylons proposed for reconductoring within Leeds are located on and over the high-pressure pipelines and its safeguarded areas. It is recommended that the ExA have regard to the views of National Gas Transmission and Northern Gas Networks in examination. Additionally, our records show that the existing pylons proposed for reconductoring within Leeds are located within the National Grid's Electric Control Zones.

### Biodiversity

30 Immediately south of the existing line of pylons within the Leeds district is the defined Leeds Green Habitat Network (GHN), as shown in Fig. 2 below. This has been assessed in the applicants **Environmental Statement at Chapter 8 (pg. 20)**.



**Fig. 2: Green Habitat Network (lined in green)**

31 The GHN and trees and hedgerows within and around the proposed Order Limit (including Tree refs. T894, T1079 and T1080) should be protected from harm in accordance the findings of the applicants **Arboricultural Impact Assessment, Volume 5, Document 5.3.31**. We recommend that mitigation should be secured in

accordance with the applicants **Section 8.6: BNG, Volume 7, Document 7.9**, and the mitigation and reinstatement contained within the applicants **BMS, Volume 5, 5.3.3D**.

- 32 As part of the proposal, the applicant pledges to deliver 10% net gain for biodiversity. The City Council would like to see a portion of this net gain delivered within the Leeds district. There are good local opportunities for the delivery, plus enhancement of the defined GHN areas shown in Fig.2. Given that the GHN surrounding the existing Bramham substation is within the ownership of National Grid, it is recommended that habitat enhancement and habitat creation could most easily be secured and delivered here and, appropriately conditioned in any consent and/ or within a S106 Agreement as planning obligation.

END