YG-DCO-066

# Yorkshire Green Energy Enablement (GREEN) Project

**Volume 8**

**Document 8.3 Applicant's Response to Relevant Representations**

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| 05/04/2023 | A | Final | First Issue |

# 1. About this document

## 1.1 Introduction

1.1.1 This document provides National Grid Electricity Transmission plc's (National Grid) (the Applicant) response to all Interested Parties' Relevant Representations (RRs) made on the Yorkshire Green Energy Enablement Project (Yorkshire GREEN or the Project). These representations were made to the Planning Inspectorate (PINS) and published on 22 February 2023.

1.1.2 Thirty-nine RRs were made in response to the Yorkshire GREEN application. Section 2 below specifies the Interested Party and sets out their Relevant Representation alongside the Applicant's response.

1.1.3 It should be noted that RR-018 (Hambleton District Council), RR-019 (Harrogate Borough Council), RR-032 (North Yorkshire County Council) and RR-034 (Selby District Council) are identical and have therefore been responded to as one response. As of 01 April 2023, these four authorities (alongside four other authorities being Ryedale District Council, Scarborough Borough Council, Craven District Council and Richmondshire District Council) formed a Unitary Authority called North Yorkshire Council.

# 2. The Applicant's response to Relevant Representations

## 2.1 RR-001 [Addleshaw Goddard LLP on behalf of Network Rail Infrastructure Limited]

Table 2.1 – RR-001 [Addleshaw Goddard LLP on behalf of Network Rail Infrastructure Limited]

| Response Reference | Relevant Representation Issue | National Grid Response |
|---|---|---|
| 1.1 | APPLICATION BY NATIONAL GRID ELECTRICITY TRANSMISSION FOR THE NATIONAL GRID (YORKSHIRE GREEN ENERGY ENABLEMENT PROJECT) DEVELOPMENT CONSENT ORDER [202[*]] SECTION 56 PLANNING ACT 2008: RELEVANT REPRESENTATION OF NETWORK RAIL INFRASTRUCTURE LIMITED This is the section 56 representation of Network Rail Infrastructure Limited (Network Rail) provided in respect of National Grid Electricity Transmission's (Promoter) application for a development consent order (Order) for the Yorkshire GREEN Project (Scheme). Network Rail is a statutory undertaker and owns, operates and maintains the majority of the rail infrastructure of Great Britain, including the East Coast Main Line (Railway). The Order sought by the Promoter includes consent and powers for the upgrade and reinforcement of the high-voltage power network, comprising a new 400kV and 275kV electricity transmission connection and new infrastructure including substations, overhead lines, underground cables and cable sealing end compounds, upgrades to the existing transmission system, and associated developments for the Project on land sited within Yorkshire spanning from | National Grid agrees with Network Rail's summary of the Project. |

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| | approximately 1.5km north-east of the village of Shipton to the existing Monk Fryston substations, located to the east of the A1 and immediately south of the A63. | |
| 1.2 | The Promoter seeks authority and powers in the draft Order for new rights to be compulsorily acquired over and/or the temporary use of 11 plots of land owned by Network Rail comprising:<br>• six plots forming part of the railway located west of the A19 (plots B2-36, B2-37, B2-40, B2-55, B3-30 and B3-32);<br>• one plot forming part of the Leeds and York Railway (Harrogate Line) (plot C1-17) located south of the A59;<br>• three plots forming part of the South Milford and Micklefield Line located near Huddleston Grange (plots E5-04, E5-15) and located south of Hall Lane, Newthorpe (plot E6-22); and<br>• one plot forming part of the land on Newthorpe Lane, B1222 (plot E6-36). | Proportionate and necessary compulsory acquisition powers have been sought within the DCO application for rights on land either forming part of, or in close proximity to, the Railway. Notwithstanding this, National Grid is engaged in reaching a voluntary agreement with Network Rail for the acquisition of any rights on land owned by Network Rail, initially via the Statement of Common Ground (SoCG) in order to establish the principal terms to be agreed in the easement.<br><br>This approach was agreed with Network Rail based on experience from previous Nationally Significant Infrastructure Projects (NSIP's) promoted by National Grid where Network Rail's interests were affected. The main area of disagreement between the parties arises due to Network Rail's request to terminate any rights given to National Grid on 6 months' notice. National Grid is content to agree interruptions to the national electricity transmission network where necessary because of emergency, or because of reasons of safety for the public or the operation of the railway. However National Grid believes it is in the public interest to have a reliable electricity network, and seeks rights suitable for that purpose. |
| 1.3 | As the Promoter proposes to compulsorily acquire new permanent and temporary rights to be exercised on land either forming part of, or in close proximity to, the Railway, Network Rail wishes to object to the making of the Order on the ground that the rights sought might interfere with the safe and efficient operation of the Railway. | National Grid do not consider that there will be an interference with the safe and efficient operation of the Railway as a result of the Project and are engaged in the negotiation of appropriate protective provisions to ensure that Network Rail's operation would be adequately protected under the DCO. |

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| 1.4 | In order for Network Rail to be in a position to withdraw its objection, Network Rail will require adequate protective provisions and/or requirements to be included within the Order and an agreement with the Promoter to ensure that the new rights sought are exercised in regulated manner to prevent adverse impacts to the Railway. Network Rail is continuing to review the Promoter's plans, draft Order and application documents, and will continue to work constructively with the Promoter to clarify any issues raised. The Examining Authority and the Secretary of State will need to be satisfied that railway safety and operations will not be compromised by the making of the Order. | National Grid are actively engaged in the negotiation of protective provisions which will provide adequate protection to Network Rail's undertaking. |
| 1.5 | Network Rail respectfully requests that the Examining Authority treats Network Rail as an Interested Party for the purposes of the Examination and reserves the right to produce additional and further grounds of concern when further details of the Scheme and its effects on Network Rail's assets are available. | National Grid welcomes Network Rail being treated as an Interested Party for the purposes of the Examination and will seek to engage with any further requests for details raised by Network Rail during the Examination. |

## 2.2 RR-002 [Ainsty (2008) Internal Drainage Board]

Table 2.2 – RR-002 [Ainsty (2008) Internal Drainage Board]

| Response Reference | Relevant Representation Issue | National Grid Response |
|---|---|---|
| 2.1 | Thank you for sending the supporting information for the proposed National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order. This is one of a two responses from Internal Drainage Boards who are Members of the York Consortium of Drainage Boards. We have reviewed the information provided and established the relevant locations which are in the Ainsty (2008) Internal Drainage Board District from the maps provided : - Section B - Sheet 3 - only to West of River Ouse - Section B - Sheet 4 - Section B - Sheet 5 - Section C The Board having the following comments on the proposals : | National Grid acknowledges receipt of the relevant representation from the Ainsty Internal Drainage Board (AIDB), and has provided detailed responses to the specific matters raised therein below. |
| 2.2 | It appears that linear cable works will be crossing the Boards district within the red line boundary. In this work it is likely the route will cross ordinary watercourses along with the ditches we maintain. We further note the red line boundary includes other aspects such as access roads and potentially locations for construction compounds. At this stage specific details of the work to be carried out is not available. | National Grid confirms that linear cable works are proposed within that part of the Project's Order limits that intersect the AIDB's district, as described in **Section 3.4 of Environmental Statement Chapter 3 Description of the Proposed Development (Document 5.2.3) [APP-075]**. For the most part this comprises reconductoring the conductors on the existing 275kV Poppleton to Monk Fryston XC overhead line. However, a stretch of the existing 275kV XCP overhead line would be dismantled and replaced between the AIBD boundary at the River Ouse in the east and the village of Moor Monkton in the west. These works would comprise the dismantling of 10 existing lattice pylons (XCP001 to XCP008; XC428T and XC429T), and the construction of 9 replacement lattice pylons (XC421 to XC429), with temporary pylon structures being in place for the duration of the works. |

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| | | Further details of the proposed works within the AIDB district, including the proposed location and type of access track and the location and area of pylon working areas can be found in **Figures 3.2 and 3.3 of the Environmental Statement Chapter 3 Description of the Project Figures (Document 5.3.4(B)) [AS-017]**.<br><br>In addition, illustrative **Construction Plans** (**Document 2.16) [APP-065]** are provided, including examples of typical access roads (stone roads and trackway) and watercourse crossings (culverts and clear span bridges).<br><br>With regards to watercourse crossings, further information is provided below in the response to 2.5. |
| 2.3 | The Board is concerned about the positioning of the future assets so maintenance of these watercourses can be sustained. This work directed by the Board requires the use of heavy machinery such as tracked excavators and tractors for channel maintenance. To facilitate this the Board not only requires maintenance access along the maintained ditch but also access to unload and move the equipment to the location. The Board needing to be able to obtain and maintain safe access to these watercourses both now, during the construction process and on completion of the work in the future. The Board byelaws and compliance covers these objectives. | National Grid acknowledges the need for AIBD to retain access along maintained watercourses. All new permanent ground level infrastructure associated with the project will be located outside the AIBD byelaw stand-off distance of 9m from the top of bank of maintained watercourses. For the AIDB's district, this will be limited to nine new pylons noted above, which are in the vicinity of Maintained Watercourses 052 (Brecks Dyke) and 054 (Deighton Plantation Dyke). Conductors will oversail AIDB maintained watercourses, but with a minimum clearance height of above top of bank ground levels of 7.7m for 400kV and 7.0m for 275kV overhead lines respectively. |
| 2.4 | The Board also seeks that any development on the site includes effective control and attenuation of runoff. The Board requests this complies with the requirements of the Planning Authority and its planning conditions at the relevant location. In addition within the Boards Drainage District any outfall discharging to any ordinary | The Environmental Statement submitted in support of the Application includes **Chapter 9 Hydrology (Document 5.2.9) [APP-081]**, which sets out in **Table 9-18** two embedded environmental measures that provide details of how surface water drainage would be managed for the construction and |

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| | watercourse along with any of our 'maintained' watercourses will require the consent of the Board. The Boards 'maintained' watercourses being highlighted on the Boards Drainage District map which is available on our website. | operational phases of the Project respectively (Measures HY3 and HY16 respectively.<br><br>For construction, HY3 states that a Drainage Management Plan (DMP) will be prepared by the construction contractor post-grant of the Development Consent Order (DCO) and prior to commencement of works. This is secured through **Requirement 6(1)(b) of the draft Development Consent Order (DCO) (Document 3.1(B)) [AS-011]**. The DMP will be subject to approval by the relevant Planning Authority, in consultation with the relevant drainage authority (which would be AIDB for its district). The DMP will provide details of drainage arrangements for temporary construction infrastructure (compounds, access tracks, pylon working areas), including the use of infiltration and attenuation SuDS features to control runoff to pre-existing rates. Locations of outfalls and associated peak flow rates will be specified in the DMP.<br><br>For operations, HY16 specifies that detailed drainage design for permanent project infrastructure with new impermeable surfaces, comprising substations, Cable Sealing End Compounds (CSEC's) and associated access roads, will be carried out post-grant of the DCO, and will be subject to approval from the relevant planning authority following consultation with the relevant drainage authority via **Requirement 6(4) of the draft Development Consent Order (Document 3.1(B)) [AS-011]**. However, there are no substations or CSECs in that part of the Project area that intersects with the AIDB's district, so HY16/ Requirement 6(4) should not be relevant to AIDB. |
| 2.5 | GUIDANCE ON THE BOARD'S CONSENT<br>The following highlights the details of the Boards consent requirements which are as follows : Under the Land | National Grid notes AIDB's guidance on consenting requirements for ordinary watercourses in their district. |

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| | Drainage Act 1991 and the Boards' byelaws, the Board's prior written consent (outside of the planning process) is needed for:-<br>a. any connection into a Board maintained watercourse, or any ordinary watercourse in the Board's district.<br>b. any discharge, or change in the rate of discharge, into a Board maintained watercourse, or any ordinary watercourse in the Board's district. This applies whether the discharge enters the watercourse either directly or indirectly (i.e. via a third party asset such as a mains sewer).<br>c. works within or over a Board maintained watercourse, or any ordinary watercourse in the Board's district – for example, land drainage, an outfall structure, bridges, culverting etc.<br>d. any proposed works or structures in, under, over or within 9 metres of the top of the bank of any watercourse. Please note that the Board does not, generally, own any watercourses and the requirement to obtain the Board's consent is in addition to obtaining consent from any land owner or other authority to carry out the relevant works. Full details of the Consent process can be found on our website:- http://www.yorkconsort.gov.uk | Within the AIBD district, National Grid envisage there would be a requirement to apply for Land Drainage Consents for up to four new temporary access watercourse crossings. These comprise one temporary clear span bridge on a maintained watercourse (requiring Section 66 consent) and three culverts (requiring Section 23 Consent). However, as currently drafted Article 52 and Schedule 16 of the **draft Development Consent Order (Document 3.1(B)) [AS-011]** seeks to disapply the requirement for Section 66 consent for the temporary clear span bridge. National Grid acknowledges the AIDB's objection to disapplication of its byelaws (as set out in 2.7 below) and will engage further with the AIDB in this regard. For the avoidance of doubt the **draft Development Consent Order (Document 3.1(B)) [APP-011]** does not seek to disapply the requirement to obtain Section 23 Consents under the Land Drainage Act 1991.<br><br>Depending on condition assessments to be carried out prior to commencement of works, there may also be a need to carry out upgrade works on existing culverts for another four construction access crossing points, which would also require Section 23 Consents. As noted above in the response to 2.3, all new pylons will be more than 9m from any watercourse.<br><br>It is envisaged that Land Drainage Consents (save for any section 66 byelaws which have been disapplied under **Article 52 and Schedule 16 of the draft Development Consent Order (Document 3.1(B)) [AS-011])** would be applied for post-granting of the DCO but prior to commencement of works. |
| 2.6 | DRAFT DCO PART 4 SUPPLEMENTAL POWERS<br>In relation to the documentation the supplemental powers 19 Discharge of water we note that Internal Drainage Boards have powers from the Land Drainage Act 1991. In 19 clause (3) consent for watercourses is required of | National Grid acknowledges AIDB's comments on **Articles 19(3) and 19(5) of the draft Development Consent Order (Document 3.1(B)) [AS-011]**. National Grid is currently reviewing Article 19 and will continue to engage with AIDB in relation to this matter. |

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| | the person to whom it belongs. The Board seeks confirmation that belongs includes the Board and its powers to consent under the Land Drainage Act 1991. The Board would also seek that our maintained watercourses are protected in the same way as designated 'Main River' in 19(5). We however would also add to this clause unless otherwise consented under the relevant legislation which for IDB's is the Land Drainage Act 1991. | |
| 2.7 | DRAFT DCO SCHEDULE 16 AMENDMENT TO LOCAL LEGISLATION PART 2<br>The Board 'objects' to the Ainsty (2008) IDB Byelaw clauses being disapplied as included in the draft consultation DCO document. The applicant being advised of the Boards position following an earlier consultation meeting. The Byelaws included to be disapplied are used to protect the banks from damage/over loading and to sustain maintenance access to the watercourse. The Board's comments have been made following consideration of the information provided. If you have any queries on the above matter then please do not hesitate to contact the Board for further information. | National Grid acknowledges AIDB's objection to disapplication of certain of its byelaws (Byelaws 10, 14, 15 and 17) by virtue of **Article 52 and Schedule 16 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**. National Grid has sought to engage with AIDB on this matter and will continue to engage with AIDB in order to attempt to reach agreement during the course of the Examination. |

## 2.3 RR-003 [BNP Paribas Real Estate on behalf of Royal Mail Group]

Table 2.3 – RR-003 [BNP Paribas Real Estate on behalf of Royal Mail Group]

| Response Reference | Relevant Representation Issue | National Grid Response |
|---|---|---|
| 3.1 | Royal Mail Group Limited (Royal Mail) supports National Grid's Yorkshire Green scheme, but is seeking to secure mitigations to protect its road based operations during the scheme's construction phase.<br><br>Under section 35 of the Postal Services Act 2011 (the "Act"), Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service. The Act includes a set of minimum standards for Universal Service Providers, which Ofcom must secure. The conditions imposed by Ofcom reflect those standards. Royal Mail is under some of the highest specification performance obligations for quality of service in Europe. Its performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project.<br><br>Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network. Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's | National Grid notes that Royal Mail Group Limited (Royal Mail) supports the Project. National Grid is also aware that Royal Mail has sought to secure mitigation to protect its road-based operations due to regulatory conditions imposed by Ofcom in order to discharge Royal Mail's duties under the Postal Services Act 2011 (the Act) during the Project's construction stage. National Grid also acknowledges that Royal Mail is regulated by Ofcom to meet minimum standards under the Act. As has been stated by Royal Mail, National Grid has engaged positively with Royal Mail in respect of the Project following submission of Royal Mail's section 42 consultation response in December 2021.<br><br>As a result of the above engagement, wording has been included within **paragraphs 8.2.5 and 8.2.6 of the Construction Traffic Management Plan (CTMP) (Document 5.3.3F) [APP-099]** which provides Royal Mail with satisfactory advance notification, liaison and information on works that affect the highway network. The CTMP is secured through **Requirement 5(2)(d) of the Draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br>**Paragraphs 8.2.5 and 8.2.6 of the CTMP (Document 5.3.3F) [APP-099]** 'Royal Mail Management and Mitigation' states the following: |

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| | operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.<br><br>Royal Mail has two operational properties within approximately two miles of the DCO boundary. In exercising its statutory duties, Royal Mail vehicles use on a daily basis all of the roads that may be affected by any Traffic Management measures, partial or total road closures and /or any additional traffic during the construction phase of Yorkshire Green. Any congestion on these roads has potential to adversely affect Royal Mail operations.<br><br>Following submission of Royal Mail's section 42 consultation response in December 2021, Royal Mail has had very helpful contact with National Grid as a result of which wording has been included within the Construction Traffic Management Plan dated November 2022 (document reference is 5.3.3F Appendix 3F) paragraphs 8.2.5 and 8.2.6 which is in line with Royal Mail's section 42 consultation requests. The applicant has accepted this wording as a commitment, which if fully implemented, will provide Royal Mail with satisfactory advance notification, liaison and information on works that affect the highway network.<br><br>However, Royal Mail is registering be an Interested Party to the Examination in order to protect its position and seek to ensure that paragraphs 8.2.5 and 8.2.6 of the CTMP remain unchanged during the Examination and will take effect during the construction phase. | "*National Grid have considered feedback from Royal Mail during the development of this CTMP and have included the following measures in the CTMP in respect to feedback received:*<br><br>*1. Royal Mail is notified by National Grid or its contractors one month in advance on any proposed road closures / diversions / alternative access arrangements, and hours of working related to such measures; and*<br><br>*2. If road closures / diversions are proposed, National Grid or its contractors liaise with Royal Mail one month in advance to identify and make available alternative highway routes for operational use, where possible.*<br><br>*It should be noted that as set out in Section 7.2 above it is not proposed that any road closures and any associated diversions would be required for this Project, therefore National Grid does not anticipate the measures 1 and 2 being required.*"<br><br>Given the wording is agreed with Royal Mail, National Grid does not anticipate any further changes to that wording during the course of examination of the Project. National Grid understands that the wording provides sufficient mitigation to protect Royal Mail's road-based operations.<br><br>In addition, it should be noted that **Section 12.11, Table 12.36 of the Traffic and Transport assessment (Document 5.2.12) [APP-084]** concludes that the impacts on driver delay would be 'Not Significant' during construction or operation.<br><br>National Grid appreciates that Royal Mail is an Interested Party to the examination and will maintain open communications with Royal Mail throughout the course of the examination. |

## 2.4 RR-004 [Canal & River Trust]

Table 2.4 – RR-004 [Canal & River Trust]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 4.1 | The Canal & River Trust (the Trust) is the charity which looks after and brings to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. The Trust is a charitable organisation and is the navigation authority for the whole of the navigable River Ouse. The Trust has a duty under S105 Transport Act 1968 to maintain commercial waterways in a suitable condition for use and this applies to the relevant part of the River Ouse. In relation to this function and the Act it has duties relating to the safety of navigation on the River, which is used by both leisure and commercial vessels. Under its articles of association, the Trust's objects include the object to preserve, protect, operate and manage inland waterways for public benefit for navigation. | National Grid acknowledges The Canal & River Trust's duty and seeks to work with the Trust to ensure it can fulfil its obligations, in conjunction with the construction and operation of the Project. To date National Grid has engaged with the Trust through meetings and email correspondence, and will continue to do so during the examination process, with particular focus on agreeing the content of the draft protective provisions, as set out within **Schedule 15 Part 3 of the draft Development Consent Order (Document 3.1(B)) [AS-011].** |
| 4.2 | The proposals include the removal of an existing cable above the River Ouse and the construction of a new overhead electricity cable to the north of Nether Poppleton (shown on drawings DCO_B/LA/PS/04 Sheet 4, and DCO_B/WO/PS/0 sheet 4). This part of the River Ouse is utilised by leisure users and associated tourist related business. It is the sole waterway between York and Ripley. Examples of users that could be affected include Linton Lock Marina to the north, and York Marina to the south. Unplanned closures could impact these users and affect traffic and visits in York and upstream. It | In this location, the existing XCP 275kV overhead line currently oversails the River Ouse and will be dismantled as part of this Project. A new realignment of the XCP 275kV overhead line (re-named as XC overhead line as part of the Project) will take place which will oversail the River Ouse. Access to these works will take place from the north and south, with no temporary construction access route proposed crossing the river. Therefore, the works in proximity to the river will comprise of scaffold structures constructed to protect the river underneath during the stringing of the new overhead line conductors (wires) |

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| | is essential that any works to remove and install overhead cables are co-ordinated with the Trust to allow the Trust to appropriately manage vessel passage and maintenance activities on the River, in accordance with our responsibilities referred to above. | and for the dismantling of the existing overhead line conductors (wires).<br><br>This aligns with the Trust's understanding of the Project. National Grid acknowledges the impact that unplanned closures could have and appreciates the need to co-ordinate with the Trust to achieve a satisfactory position for all parties. As such National Grid has engaged with the Trust and will continue to do so throughout the examination process.<br><br>To clarify, as stated within **paragraph 6.3.4 of the Construction Traffic Management Plan (Document 5.3.3F) [APP-099]** the works will be managed through temporary stopping up of navigation rights, which will likely take place overnight for a short period (potentially an hour) approximately eight times over the construction period of the Project. The Trust will be given notice of any such closures, as secured in the Protective Provisions of the **draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br>National Grid has pro-actively sought to minimise disruption by seeking to undertake works that would require closures to the river at night, and ensuring closures are kept to a short duration. This means any disruption is likely to be avoided entirely or kept to a minimum. |
| 4.3 | The draft article 54 of the DCO as submitted grants a broad power to National Grid to close the river during periods of construction and maintenance. We have concern that could allow for works to interrupt river traffic or maintenance access with limited co-ordination with the Trust. The proposed powers sought in the DCO for the "temporary closure of, and works in, the River Ouse", as worded, would prevent the Trust from carrying out its | The wording of article 54 is precedented in The National Grid (Richborough Connection Project) Development Consent Order 2017 **(**Richborough Order) (article 38) and is considered proportionate by National Grid.<br><br>The powers contained within **article 54 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** |

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| | statutory duty, and could also limit the Trust's ability to undertake remedial works to the river required to ensure that they are not placed in breach of their statutory obligations, or their obligations under the articles of association. | would be subject to the protective provisions contained within Part 3 of Schedule 15. Proposed protective provisions specifically for the benefit of the Trust have been included within the **draft Development Consent Order (Document 3.1(B)) [APP-011]** and National Grid is continuing to engage in discussions to ensure that these provisions adequately protect the Trust's interests.<br><br>National Grid has received feedback from the Trust on the draft protective provisions sought through **Schedule 15 Part 3 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**. National Grid has reviewed the comments received and responded to the Trust. National Grid will continue engagement with the Trust to reach an agreeable position.<br><br>As detailed above, any disruption would be short lived and kept to times when use of the river is minimal (during the night-time).<br><br>National Grid does not seek to limit the Trust's ability to undertake remedial works, and considers that the short duration of closures and undertaking these overnight, will mean the Trust is able to fulfil its statutory obligations. The short stretch of river identified for closure (see **Access Rights of Way and Public Rights of Navigation Plan Section B, Sheet 1 of 1 (Document 2.7.2) [APP-027]**) is unlikely to impact upon the Trust's maintenance activities. |
| 4.4 | Protective provisions have been provided for the Trust (schedule 12, part 3, of the draft DCO). However, these do not offer appropriate protection for the Trust, as they do not provide any controls for the timing of works, only providing the requirement for 28 days' notice to be given to the Trust of works to obstruct or interfere with navigation rights, and the agreement of conditions | As explained above, National Grid has reviewed the comments received on the protected provisions and responded to the Trust. . National Grid will continue to engage with the Trust on these matters and seek to confirm an appropriate position on the notice period. |

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| | regarding the works prior to their commencement. Typically the Trust requires longer periods of notice for works affecting navigation in order to notify users of the navigation and co-ordinate all works on any one navigation. The length of notice required depends on what time of day and what time of year the closure is planned for. The period of notice required can be as long as 9 months. | However, the scale and complexity of the Project, combined with the many affected landowners and dependence on timings for outages, mean that a 9-month notice period would not be feasible. To minimise disruption on other interested parties and allow timely delivery of the Project, a proportionate notice period is necessary. National Grid has sought to minimise disruption by seeking to undertake works at night-time, keeping closures to a short duration and impacting a short stretch of river.<br><br>Again, drawing on the precedented approach followed in the Richborough Order, where the equivalent powers were used by National Grid, 20 business days' notice was provided to the relevant harbour authorities prior to the works in the River Stour, as detailed at condition 11 of the Deemed Marine Licence in Schedule 9 of the Richborough Order.<br><br>As such, it is considered that a shorter notice period is adequate without impacting the Trust's ability to fulfil its duty. Nevertheless, National Grid will continue to engage with the Trust on this matter. |
| 4.5 | The wording of 13 (2) regarding conditions that can be requested by the Trust is vague, and is open to interpretation. We note that the draft protective provisions provide significantly less protection for the Trust than those in recent DCOs containing protective provisions for bodies with similar safety and navigational responsibilities to the Trust. The draft wording could therefore still allow for future unscheduled closures of the River Ouse during times when craft passage is necessary for use of the waterway and for maintenance. Our position is that any operations affecting navigation on the River Ouse need to be co-ordinated with the Trust | National Grid will continue to work with the Trust and will seek to agree appropriate wording within the protective provisions. National Grid does not seek to prevent the Trust undertaking maintenance work, and National Grid's commitment to seek to undertake works during the night-time demonstrates its pro-active approach to reducing potential conflict.<br><br>In addition, the physical extent of the area for closure is short (see **Access Rights of Way and Public Rights of Navigation Plan Section B, Sheet 1 of 1 (Document 2.7.2) [APP-027]**) and therefore National Grid considers it highly unlikely that the |

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| | appropriately, so as to ensure that those operations do not adversely impact upon the Trust's charitable objectives and maintenance responsibilities. | closures proposed would conflict with the Trust's maintenance responsibilities. |
| 4.6 | In addition, the Trust in its capacity as navigation authority, is concerned with ensuring that there are no adverse impacts on navigation or navigational safety on the River Ouse arising from the proposed development, including as a consequence of any detrimental impact on the structural integrity of the river and river banks. The proposals include works above the River Ouse, and it is unknown whether construction processes may require the placement of temporary boats or equipment in or near the river. The Trust does not wish to face the risk of potential costs and losses to repair any damage through no fault of its own. Given the above risks, we respectfully request that DCO, when made, should include protective provisions to secure the position of the Trust in our capacity as Navigation Authority. This would include approval of work details by the Trust's engineer, the making good of any detriment and the provision of details concerning protective fencing, surveys, lighting and as built drawings. Works affecting Trust waterways can be agreed with prospective applicants via the use of the Trust's Code of Practice for Third Party Works. The Code of Practice is designed to safeguard the Trust's assets and to deal with the nuances works affecting navigable waterways. In order to ensure that the construction works can be carried out without resulting in harm to the ability of the Trust to carry out its statutory duties, the Trust advises that works adjacent to and over the River Ouse should abide by the Code of Practice. The Code of Practice is critical to the Trust, as it specifically deals with waterway structures and the nuances of protecting the rights of our users, boaters, anglers etc. Based on the details provided through the application, there is | The works would require a vessel or vessels to be in the river. This will be to ensure navigation rights are stopped, and to pull bonds across. No work is proposed to take place within the river or to the river bank.<br><br>The protective provisions as per **Schedule 15, Part 3 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** include measures for the making good of any detriment. Given the scope of works, National Grid does not anticipate that any reinstatement works would be required, but has included protection against this as a precautionary measure and to satisfy any concerns the Trust may have.<br><br>In terms of the Trust's Code of Practice, there is much alignment between the protective provisions and the Code of Practice. Where these do not align and the Trust has specific concerns, National Grid will continue to engage with the Trust to seek to address these.<br><br>As above, National Grid National Grid has reviewed the comments received on the protective provisions and responded to the Trust. . National Grid will continue to engage with the Trust on these measures and seek to agree an appropriate approach to notification for the Trust in light of the Code of Practice. |

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| | insufficient clarity on what standard would be applied for the Trust to comment on how works might affect passage on the River Ouse. The Trust would normally deal with these matters via the Code of Practice on a site-by-site basis and would need to ensure that measures are in place to mitigate stability and any chances of landslides. The wording of the protective provisions as presently drafted could allow for works to be undertaken outside of the Trust's established process via the Code of Practice. Additional wording to make it explicit that works will accord with the Code of Practice could help to overcome the concerns raised above. More details on the Code of Practice can be found at https://canalrivertrust.org.uk/business-and-trade/undertaking-works-on-our-property-and-our-code-of-practice | |
| 4.7 | Although the Trust has been in discussions with the Applicant about the effect of the proposals on its undertaking, the protections provided in the draft DCO do not adequately address the Trust's concerns. The Trust believes it should be possible to resolve its concerns with the Applicant by negotiation, but reserves the right to appear at future hearing(s) if they are not resolved satisfactorily by that stage. In addition to the above, the Trust wishes to provide the following general comments on the scheme: | National Grid agrees that it should be possible to resolve concerns through ongoing negotiations of the protective provisions and will continue to engage with the Trust on that basis. |
| 4.8 | The submitted plans (DCO_B/WO/PS/0, sheet 4) show utility undergrounding work to the south west of the River Ouse. We advise that careful management of loading and vibrations from construction plant and equipment in proximity to the river would be required in order to prevent any increase in the risk of land instability next to the river which, in the worst case scenario, could result in localised landslips into the river which could hinder | National Grid concurs with the Trust's comment and confirms loading and vibration in proximity of the river Ouse has been fully considered and addressed. The measures described and referenced by the Trust will be implemented in accordance with **Requirement 5(2)(a) of the draft Development Consent Order (Document 3.1(B)) [AS-011]**. For the avoidance of doubt, **ES Chapter 3 Appendix 3H - Noise and Vibration** |

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| | navigation. We recognise that the applicant has addressed this matter within the submitted Noise and Vibration Management Plan. The measures described in paragraphs 2.5.10 to 2.5.12 are considered appropriate by the Trust to manage this risk. In accordance with the provisions of the draft DCO (Schedule 3, part 5), we request that these details should be complied with as part of the wider Construction Management Plans. | **Management Plan (Document 5.3.3H) [APP-101]** is a certified document as listed within Article 48 of the DCO. |
| 4.9 | The Trust is keen to ensure that risks of pollution or other adverse impact on the water quality of the river during and post construction is prevented. Consideration should be given towards measures to limit the risk of contamination towards the river from wind blow, seepage or spillage during the course of development operations in proximity to the river. We anticipate that appropriate mitigation measures will be identified within the outline Construction Management Plan details to be reserved through schedule 4, part 6 of the draft DCO. | National Grid acknowledges the Trust's concerns, and fully understands the need to ensure water quality is not adversely impacted during construction activities. As such, and as acknowledged by the Trust, a range of pollution prevention measures have been incorporated into the **Code of Construction Practice (Document 5.3.3B) [APP-095]**. This includes dust management measures, stand off distances from watercourses, and drainage measures. The Code of Construction Practice will be implemented in accordance with **Requirement 5(2)(a) of the draft Development Consent Order (Document 3.1(B)) [AS-011]** and is a certified document listed within article 48. |

## 2.5 RR-005 [Carter Jonas LLP on behalf of Castlegate Trustees - WH Strawson (Farms) Ltd Pension Scheme]

Table 2.5 – RR-005 [Carter Jonas LLP on behalf of Castlegate Trustees - WH Strawson (Farms) Ltd Pension Scheme]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 5.1 | The project impacts land which is within the ownership of my client the Castlegate Trustees. I am therefore registering their interest to be kept informed of any developments and to enable comments to be made in due course if required. | National Grid notes this comment and will continue to engage with the Landowner. A meeting was held with the landowners agent on 10 March 2023 at which all comments raised in this Relevant Representation were discussed as well as updates regarding the project. |
| 5.2 | The main points of concern regarding the proposals at present relate to the time and nature of access, appropriate access routes and compensation and appropriate restoration following any works. | National Grid notes the issues raised by the agent and has sought to address these points of concern below.<br><br>Time and Nature of Access<br>The proposed access routes have been developed through the non-statutory and statutory consultation process of the Project. National Grid will continue to engage with the Landowner to reduce the impact of these where possible. National Grid will use a Land Officer/Agricultural Liaison Officer (ALO) to provide information and communications to local landowners and those with land-related interests regarding daily construction activities to minimise disruption to agricultural activities, as detailed at **Paragraph 1.3.7** of the **Outline Soil Management Plan (Document 5.3.3E) [APP-098]** which is secured by **Requirement 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** and is a certified document listed within article 48.<br><br>Appropriate Access Routes |

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| | | The access routes have been designed as far as possible to utilise existing farm tracks. The access points with routes are shown on **Sheet 2 of 7 of the Access Rights of Way and Public Rights of Navigation Plan Section E (Document 2.7.5) [APP-030]**. The use of existing farm tracks where possible will minimise damage to agricultural land and avoid the need to create additional access routes.<br><br><u>Compensation</u><br>National Grid is obliged to compensate all owners and/or occupiers where land is required permanently or temporarily and where rights are required in land. National Grid has offered voluntary terms to the landowner that are considered to exceed entitlement under statutory provisions. If voluntary terms cannot be agreed and powers exercised, then National Grid will be obliged to pay statutory compensation for the compulsory acquisition of land or rights under the foregoing powers. Compensation is also payable for loss or damage caused by the exercise of any power of temporary use of land. Any dispute in respect of the compensation payable is to be by the Lands Chamber of the Upper Tribunal as set out at **paragraph 6.4.4 of the Statement of Reasons (Document 4.1) [APP-069]**.<br><br><u>Soil Restoration</u><br>As part of the construction and reinstatement works of the Project, National Grid will adhere to **ES Chapter 3 Appendix 3E Outline Soil Management Plan (Document 5.3.3E) [APP-098]**and the Soil and Aftercare Management Plan to be prepared and approved under **Requirement 6 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** to ensure the appropriate soil restoration measures are undertaken. The soil reinstatement will be concluded as per **paragraphs 1.7.62-1.7.65 of ES Chapter 3 Appendix 3E** |

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| | | **(Document 5.3.3E) [APP-098]**. The soil will be assessed on a location-by-location basis depending on the soil survey data. |
| 5.3 | It is considered important that works are undertaken in the most appropriate way to minimise disruption for agricultural activities on the ground. This land is subject to a tenancy and therefore the main impact will be upon the tenant, Mr Lawson. | National Grid will use a Land Officer/Agricultural Liaison Officer (ALO) to minimise disruption for the agricultural activities through regular updates to the Landowner and/ or Tenant.<br><br>To confirm, National Grid has been liaising with both the Landowner and the Tenant with regard to the Project. |

## 2.6 RR-006 [Carter Jonas LLP on behalf of Philip Watson]

Table 2.6 – RR-006 [Carter Jonas LLP on behalf of Philip Watson]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 6.1 | We are writing in objection to the current proposals on behalf of Mr Philip Watson. The current proposals impact on land which is within the ownership of Mr Philip Watson (NYK89551) together with a right of way which benefits the land within Mr Watson's ownership. We have the following concerns regarding the proposals: | National Grid is aware of a number of the Landowner's concerns relating to the Project and has been working to try and give the necessary assurances and find a mutual solution through engagement in meetings and correspondence. |
| 6.2 | 1) Area of proposed compulsory acquisition<br>The current proposed plans for compulsory acquisition of land from Mr Watson include approximately 2.3 acres of land identified as D1-33 on Land Plan section D page 1. This land includes the current principal access point to the field together with a large proportion of the road frontage benefitting the land which appears to be unnecessary for the long-term National Grid operations. This leaves an unsatisfactory situation for Mr Watson whereby he does not have control over the principal access point to his field. The prospects of creating a new access point on land which Mr Watson owns is significantly limited given the close proximity of the A64 slip roads and topography of the land which continues to have road frontage. This will have a significant impact on the value of the land should any future alternative use opportunities arise. We do not consider it necessary for the compulsory purchase to include the road frontage section of this field other than the access strip to the cable sealing end compound (CSEC). It is noted that the secondary access to this field is also to be compulsorily | Whilst the construction and operation of the Project will require control of the access to the Tadcaster West Cable Sealing End Compound (CSEC) in the field off the A659, all necessary rights will be granted to the Landowner to continue to access his remaining holding.<br><br>The Class 1 (freehold) acquisition of the hedgerow is required to ensure essential mitigation planting and reinforcing can take place in order to provide visual screening of the new CSEC and to enhance green infrastructure within the Locally Important Landscape Area designation to reflect Local Development Plan policy outlined in **Table 6.2 of ES Chapter 6: Landscape and Visual (Document 5.2.6) [APP-078]**. The proposed planting is illustrated on **Figure 3.11: Outline Landscape Mitigation Strategy in ES Chapter 3 Description of the Project Figures (Document 5.4.3) [APP-164]**. The Class 3 (rights of access) acquisition of the road frontage is necessary to ensure that sufficient visibility is available for all traffic entering or exiting the site. |

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| | acquired by National Grid and the right of way is to be extinguished. | National Grid considers that the proposed access will be an improvement to the Landowner's existing access due to it being widened and the Landowner's reduced maintenance liability.<br><br>National Grid wishes to engage further with the Landowner as to how the access onto his land from the access route can be best configured in order to facilitate his current and future requirements for the land, including security provisions. |
| 6.3 | 2) Orientation of CSEC<br>It is noted that the current proposed compulsory purchase area indicated on the plan will leave unfarmable corners in the field. Mr Watson has had further discussions with National Grid which indicate that it may be possible to re-orientate the cable sealing end compound to impact less on the farming operations. We would request that this is considered in the final implementation of the scheme. | During Targeted Consultation 3 National Grid received feedback from the Landowner requesting that the Tadcaster West CSEC be reorientated so that it was placed perpendicular to the field boundary. National Grid reviewed this proposal and concluded that whilst it was not preferred from an engineering perspective (due to the downleads being at a sub optimal angle and requiring the gantry to be re-orientated, as well as requiring additional equipment). The redesign would also require a greater permanent land take due to the extended access road. This is explained in more detail in the **Table 9.2 of the Consultation Report (Document 6.1) [APP-195]**. A proposal was put forward to the Landowner in January 2023 and National Grid is awaiting the Landowner's formal response in this regard.<br><br>National Grid notes the request in the representation and remains willing to discuss this further with the Landowner and his agent. |
| 6.4 | 3) Extinguishment of access rights<br>The secondary access to Mr Watson's property is via a right of way over third party land. This right of access has in recent years been the subject of a court case which was brought about due to the National Grid scheme implemented on site whereby the new pylon was located | The Project is aware of the Landowner's previous litigation in respect of the right of access, and whilst this issue did not arise as a result of the Project, the Project team has offered to facilitate dialogue between the landowner and the wider business. National Grid has repeatedly sought meetings to proactively engage with the Landowner, however the landowner |

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| | in such a way as to make the access track utilised by Mr Watson impassable. This resulted in a 5 day court case between Mr Watson and the owner of the land in question, Mr Ingham. This case confirmed the legal right of way in favour of Mr Watson and awarded damages and a contribution towards his costs. The total legal fees in relation to this case were in excess of £100,000. This could have been completely avoided had National Grid engaged with Mr Watson prior to the commencement of the previous scheme. We are pleased that National Grid have engaged with Mr Watson at an earlier stage in this consultation; however, at present no financial compensation is being offered to Mr Watson in relation to the extinguishment of these rights on the basis that National Grid do not believe they could be utilised for any use other than agriculture. As it has been established through the courts that this access does have a value, we consider that an appropriate offer should be made in relation to this extinguishment, or the access should be re-routed to provide maintained access and appropriate compensation should be provided. As part of the court case a single joint expert was appointed who reported values which he considered appropriate for the extinguishment of the rights. We would be happy to discuss this with National Grid. Mr Watson does not consider that the full extinguishment of the right of way is necessary given the initial plans did not require this. We would therefore request that all possible diversion routes are considered prior to this option being progressed. Mr Watson has previously liaised with National Grid and not been provided with a satisfactory response or evidence as to why it is not possible to provide a diversion or work around the existing route. It would appear that extinguishment is the easiest option for National Grid rather than the most appropriate to reduce the | has requested that engagement should only be carried out in writing to date. The Issue Specific Hearing 1 provided the opportunity to meet the Landowner in person and it is hoped a meeting will take place following Deadline 1.<br>Regarding National Grid's assessment that the right of access does not hold any value, National Grid wrote to the Landowner on 11 November 2022 in order to provide an explanation as to why this position has been taken.<br><br>The letter invited the Landowner to provide reasoning as to why value should be attributed to the right of way, so that National Grid could reconsider the position. No response to this letter has been received to date.<br><br>National Grid notes the Landowner's agent's comments regarding the court case and the value it attributed to the right of access. National Grid has requested further details of the court's decision and a reasoned response to National Grid's offer so that this can be considered. A meeting was held with the landowners agent on 10 March 2023 and this was reiterated.<br><br>National Grid has received a number of questions from the Landowner regarding the possibility of reconfiguring the Tadcaster East CSEC and of rerouting the right of access around the CSEC. National Grid is currently preparing a detailed response to these questions for the Landowner. However, in summary, and as presented in the response provided in **Table 9.2 of the Consultation Report, (Document 6.1) [APP-195]**, whilst a diversion of the accessway may be possible, there are significant technical complexities to achieve this and National Grid have suitability and safety concerns over providing such an access. |

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| | detrimental impacts of the scheme on the landowners affected. | |
| 6.5 | We are happy to discuss the above matters further with National Grid and their agents in due course. Should you have any queries in the meantime please do not hesitate to contact us. Mr Watson would like to add:<br>My name is [redacted] and I own the parcel of land [redacted] . I wish to object to the current proposals to the Yorkshire Green project. I believe my agent (Gillian Wilsher) has gone into greater detail about my objections. However I also wish to be included as an interested party. I object to the area of land that they are proposing to compulsory acquire adjoining the A659. This will have an adverse impact on my own access to the field. I object to the orientation of the CSEC on my land. This will result in a large amount of farmland being unworkable. The orientation could be altered to reduce the impact. The extinguishment of access rights caused by the CSEC on third party land. This is a valuable property right already subject to a recent court dispute caused by the placing of a pylon on a right of way. The judge found in my favour. National Grid have not engaged in any meaningful discussions to preserve the right of way. | National Grid notes the appointment of an agent to act on behalf of the Landowner. A meeting was held with the landowner's agent on 10 March 2023 at which all comments raised in this representation were discussed as well as updates regarding the project.<br><br>The landowner and his agent attended the Issue Specific Hearing on 23 March 2023 at which similar questions were raised to this representations.<br><br>Following the Issue Specific Hearing on 23 March 2023, the landowner provisionally agreed to a meeting with National Grid at his agents offices following Deadline 1. National Grid will seek to agree a date for this as soon as possible. |

## 2.7 RR-007 [Carter Jonas LLP on behalf of S Batty & Son]

Table 2.7 – RR-007 [Carter Jonas LLP on behalf of S Batty & Son]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 7.1 | The project impacts land which is within the ownership of my client S Batty & Son Ltd. I am therefore registering their interest to be kept informed of any developments and to enable comments to be made in due course if required. | National Grid notes this comment and will continue to engage with the Landowner. A meeting was held with the landowner's agent on 10 March 2023 at which all comments raised in this representation were discussed as well as updates regarding the project. |
| 7.2 | The main points of concern regarding the proposals at present relate to the time and nature of access, appropriate access routes and compensation and appropriate restoration following any works. | National Grid notes the issues raised by the agent and has sought to address these points of concern below.<br><br>Time and Nature of Access<br>The proposed access routes have been developed through the non-statutory and statutory consultation process of the Project. National Grid will continue to engage with the Landowner to reduce the impact of these where possible. National Grid will use a Land Officer/Agricultural Liaison Officer (ALO) to provide information and communications to local landowners and those with land-related interests regarding daily construction activities to minimise disruption to agricultural activities, as detailed at **Paragraph 1.3.7** of the **Outline Soil Management Plan (Document 5.3.3E) [APP-098]** which is secured by **Requirement 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** and is a certified document listed within article 48.<br><br>Appropriate Access Routes<br>The access routes have been designed as far as possible to utilise existing farm tracks. The access points with routes are |

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| | | shown on **Sheets 6 and 7 of 7 of the Access Rights of Way and Public Rights of Navigation Plan Section E (Document 2.7.5) [APP-030]**. The use of existing farm tracks where possible will minimise damage to agricultural land and avoid the need to create additional access routes.<br><br><u>Compensation</u><br>National Grid is obliged to compensate all owners and/or occupiers where land is required permanently or temporarily and where rights are required in land. National Grid has offered voluntary terms to the Landowner that are considered to exceed entitlement under statutory provisions. If voluntary terms cannot be agreed and powers exercised, then National Grid will be obliged to pay statutory compensation for the compulsory acquisition of land or rights under the foregoing powers. Compensation is also payable for loss or damage caused by the exercise of any power of temporary use of land. Any dispute in respect of the compensation payable is to be by the Lands Chamber of the Upper Tribunal as set out at **paragraph 6.4.4 of the Statement of Reasons (Document 4.1) [APP-069]**.<br><br><u>Soil Restoration</u><br>As part of the construction and reinstatement works of the Project, National Grid will adhere to **ES Chapter 3 Appendix 3E Outline Soil Management Plan (Document 5.3.3E) [APP-098]** and the Soil and Aftercare Management Plan to be prepared and approved under **Requirement 6 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** to ensure the appropriate soil restoration measures are undertaken. The soil reinstatement will be concluded as per **paragraphs 1.7.62-1.7.65 of ES Chapter 3 Appendix 3E (Document 5.3.3E) [APP-098]**. The soil will be assessed on a location-by-location basis depending on the soil survey data. |

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| 7.3 | It is considered important that works are undertaken in the most appropriate way to minimise disruption for agricultural activities on the ground. | National Grid will use a Land Officer/Agricultural Liaison Officer (ALO) to minimise disruption for the agricultural activities through regular updates to the Landowner and/ or Tenant. |

## 2.8 RR-008 [Carter Jonas LLP on behalf of The Aspinall Family]

Table 2.8 – RR-008 [Carter Jonas LLP on behalf of The Aspinall Family]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 8.1 | The project impacts land which is within the ownership of my clients Mr and Mrs Aspinall. I am therefore registering their interest to be kept informed of any developments and to enable comments to be made in due course if required. | National Grid notes this comment and will continue to engage with the Landowner. A meeting was held with the landowner's agent on 10 March 2023 at which all comments raised in this representation were discussed as well as updates regarding the project. |
| 8.2 | The main points of concern regarding the proposals at present relate to the time and nature of access, appropriate access routes and compensation and appropriate restoration following any works. | National Grid notes the issues raised by the agent and has sought to address these points of concern below.<br><br>Time and Nature of Access<br>The proposed access routes have been developed through the non-statutory and statutory consultation process of the Project. National Grid will continue to engage with the Landowner to reduce the impact of these where possible. National Grid will use a Land Officer/Agricultural Liaison Officer (ALO) to provide information and communications to local landowners and those with land-related interests regarding daily construction activities to minimise disruption to agricultural activities, as detailed at **Paragraph 1.3.7** of the **Outline Soil Management Plan (Document 5.3.3E) [APP-098]** which is secured by **Requirement 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** and is a certified document listed within article 48.<br><br>Appropriate Access Routes |

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| | | The access routes have been designed as far as possible to utilise existing farm tracks. The access points with routes are shown on **Sheets 6 of 7 of the Access Rights of Way and Public Rights of Navigation Plan Section E (Document 2.7.5) [APP-030]**. The use of existing farm tracks where possible will minimise damage to agricultural land and avoid the need to create additional access routes.<br><br><u>Compensation</u><br>National Grid is obliged to compensate all owners and/or occupiers where land is required permanently or temporarily and where rights are required in land. National Grid has offered voluntary terms to the landowner that are considered to exceed entitlement under statutory provisions. If voluntary terms cannot be agreed and powers exercised, then National Grid will be obliged to pay statutory compensation for the compulsory acquisition of land or rights under the foregoing powers. Compensation is also payable for loss or damage caused by the exercise of any power of temporary use of land. Any dispute in respect of the compensation payable is to be by the Lands Chamber of the Upper Tribunal as set out at **paragraph 6.4.4 of the Statement of Reasons (Document 4.1) [APP-069]**.<br><br><u>Soil Restoration</u><br>As part of the construction and reinstatement works of the Project, National Grid will adhere to **ES Chapter 3 Appendix 3E Outline Soil Management Plan (Document 5.3.3E) [APP-098]** and the Soil and Aftercare Management Plan to be prepared and approved under **Requirement 6 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**to ensure the appropriate soil restoration measures are undertaken. The soil reinstatement will be concluded as per **paragraphs 1.7.62-1.7.65 of ES Chapter 3 Appendix 3E** |

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| | | **(Document 5.3.3E) [APP-098]**. The soil will be assessed on a location-by-location basis depending on the soil survey data. |
| 8.3 | It is considered important that works are undertaken in the most appropriate way to minimise disruption for agricultural activities on the ground. | National Grid will use a Land Officer/Agricultural Liaison Officer (ALO) to minimise disruption for the agricultural activities through regular updates to the Landowner and/ or Tenant. |

## 2.9 RR-009 [Carter Jonas LLP on behalf of The Batty Family]

Table 2.9 – RR-009 [Carter Jonas LLP on behalf of The Batty Family]

| Response Reference | Relevant Representation Issue | National Grid Response |
|---|---|---|
| 9.1 | The project impacts land which is within the ownership of my client the Batty Family. I am therefore registering their interest to be kept informed of any developments and to enable comments to be made in due course if required. | National Grid notes this comment and will continue to engage with the Landowner. A meeting was held with the landowner's agent on 10 March 2023 at which all comments raised in this representation were discussed as well as updates regarding the project. |
| 9.2 | The main points of concern regarding the proposals at present relate to the time and nature of access, appropriate access routes and compensation and appropriate restoration following any works. | National Grid notes the issues raised by the agent and has sought to address these points of concern below.<br><br>Time and Nature of Access<br>The proposed access routes have been developed through the non-statutory and statutory consultation process of the Project. National Grid will continue to engage with the Landowner to reduce the impact of these where possible. National Grid will use a Land Officer/Agricultural Liaison Officer (ALO) to provide information and communications to local landowners and those with land-related interests regarding daily construction activities to minimise disruption to agricultural activities, as detailed at **Paragraph 1.3.7** of the **Outline Soil Management Plan (Document 5.3.3E) [APP-098]** which is secured by **Requirement 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** and is a certified document listed within article 48.<br><br>Appropriate Access Routes |

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| | | The access routes have been designed as far as possible to utilise existing farm tracks. The access points with routes are shown on **Sheets 6 and 7 of 7 of the Access Rights of Way and Public Rights of Navigation Plan Section E (Document 2.7.5) [APP-030]**. The use of existing farm tracks where possible will minimise damage to agricultural land and avoid the need to create additional access routes.<br><br><u>Compensation</u><br>National Grid is obliged to compensate all owners and/or occupiers where land is required permanently or temporarily and where rights are required in land. National Grid has offered voluntary terms to the landowner that are considered to exceed entitlement under statutory provisions. If voluntary terms cannot be agreed and powers exercised, then National Grid will be obliged to pay statutory compensation for the compulsory acquisition of land or rights under the foregoing powers. Compensation is also payable for loss or damage caused by the exercise of any power of temporary use of land. Any dispute in respect of the compensation payable is to be by the Lands Chamber of the Upper Tribunal as set out at **paragraph 6.4.4 of the Statement of Reasons (Document 4.1) [APP-069]**.<br><br><u>Soil Restoration</u><br>As part of the construction and reinstatement works of the Project, National Grid will adhere to **ES Chapter 3 Appendix 3E Outline Soil Management Plan (Document 5.3.3E) [APP-098]** and the Soil and Aftercare Management Plan to be prepared and approved under **Requirement 6 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**to ensure the appropriate soil restoration measures are undertaken. The soil reinstatement will be concluded as per **paragraphs 1.7.62-1.7.65 of ES Chapter 3 Appendix 3E** |

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| | | **(Document 5.3.3E) [APP-098]**. The soil will be assessed on a location-by-location basis depending on the soil survey data. |
| 9.3 | It is considered important that works are undertaken in the most appropriate way to minimise disruption for agricultural activities on the ground. | National Grid will use a Land Officer/Agricultural Liaison Officer (ALO) to minimise disruption for the agricultural activities through regular updates to the Landowner and/ or Tenant. |

## 2.10 RR-010 [Carter Jonas LLP on behalf of The Gittus Family]

Table 2.10 – RR-010 [Carter Jonas LLP on behalf of The Gittus Family]

| Response Reference | Relevant Representation Issue | National Grid Response |
|---|---|---|
| 10.1 | The project impacts land which is owned and occupied by my clients the Gittus Family. I am therefore registering their interest to be kept informed of any developments and to enable comments to be made in due course if required. | National Grid notes this comment and will continue to engage with the Landowner. A meeting was held with the landowner's agent on 10 March 2023 at which all comments raised in this representation were discussed as well as updates regarding the project. |
| 10.2 | The main points of concern regarding the proposals at present relate to the time and nature of access, appropriate access routes and compensation and appropriate restoration following the removal of existing pylons. It is considered important that works are undertaken in the most appropriate way to minimise disruption for agricultural activities on the ground. | National Grid notes the issues raised by the agent and has sought to address these points of concern below.<br><br>Time and Nature of Access<br>The proposed access routes have been developed through the non-statutory and statutory consultation process of the Project. National Grid will continue to engage with the Landowner to reduce the impact of these where possible. National Grid will use a Land Officer/Agricultural Liaison Officer (ALO) to provide information and communications to local landowners and those with land-related interests regarding daily construction activities to minimise disruption to agricultural activities, as detailed at **Paragraph 1.3.7** of the **Outline Soil Management Plan (Document 5.3.3E) [APP-098]** which is secured by **Requirement 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** and is a certified document listed within article 48.<br><br>Appropriate Access Routes |

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| | | The access routes have been designed as far as possible to utilise existing farm tracks. The access points with routes are shown on **Sheets 3 of 5 of the Access Rights of Way and Public Rights of Navigation Plan Section B (Document 2.7.2) [APP-027]**. The use of existing farm tracks where possible will minimise damage to agricultural land and avoid the need to create additional access routes.<br><br><u>Compensation</u><br>National Grid is obliged to compensate all owners and/or occupiers where land is required permanently or temporarily and where rights are required in land. National Grid has offered voluntary terms to the landowner that are considered to exceed entitlement under statutory provisions. If voluntary terms cannot be agreed and powers exercised, then National Grid will be obliged to pay statutory compensation for the compulsory acquisition of land or rights under the foregoing powers. Compensation is also payable for loss or damage caused by the exercise of any power of temporary use of land. Any dispute in respect of the compensation payable is to be by the Lands Chamber of the Upper Tribunal as set out at **paragraph 6.4.4 of the Statement of Reasons (Document 4.1) [APP-069]**.<br><br><u>Soil Restoration</u><br>As part of the construction and reinstatement works of the Project, National Grid will adhere to **ES Chapter 3 Appendix 3E Outline Soil Management Plan (Document 5.3.3E) [APP-098]** and the Soil and Aftercare Management Plan to be prepared and approved under **Requirement 6 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** to ensure the appropriate soil restoration measures are undertaken. The soil reinstatement will be concluded as per **paragraphs 1.7.62-1.7.65 of ES Chapter 3 Appendix 3E** |

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| | | **(Document 5.3.3E) [APP-098]**. The soil will be assessed on a location-by-location basis depending on the soil survey data.<br><br>Removal of Existing Pylons<br>**Paragraph 3.6.45 of ES Chapter 3 (Document 5.2.3) [APP-075]** outlines the methodology involved in removing existing pylons and reinstating the land. |

## 2.11 RR-011 [Carter Jonas LLP on behalf of University of Leeds]

Table 2.11 – RR-011 [Carter Jonas LLP on behalf of University of Leeds]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 11.1 | The project impacts land which is within the ownership of my client the University of Leeds. I am therefore registering their interest to be kept informed of any developments and to enable comments to be made in due course if required.<br><br>My client is concerned regarding access routes to maximise site safety and minimise the impact on the agricultural land. Careful attention will need to be given to the restoration of sites which are affected to limit any future impacts. It is considered important that works are undertaken in the most appropriate way to minimise disruption for agricultural and research activities on the ground. | National Grid acknowledges the Landowner's interest in the Project and will continue to engage with the Landowner. A meeting was held with the landowner's agent on 10 March 2023 at which all comments raised in this representation were discussed as well as updates regarding the Project.<br><br>National Grid notes the issues raised on behalf of the Landowner and comments as follows:<br><br><u>Access Routes</u><br>Appropriate access routes have been developed through the statutory consultation process. National Grid received detailed feedback from the Landowner regarding the preferred access routes and modified the proposed application before it was submitted in accordance with the Landowner's requests. The access points with routes are identified as AP36, AP37 & AP38, and are shown on **Sheet 2 of 2 of the Access Rights of Way and Public Rights of Navigation Plan Section D (Document 2.7.4) [APP-029]**. The access routes shown incorporate the amendments proposed by the Landowner during the statutory consultation process.<br><br><u>Restoration of Sites</u><br>As part of the construction and reinstatement works of the Project, National Grid will adhere to the **Outline Soil Management Plan (Document 5.3.3E) [APP-098]** and the Soil and Aftercare Management Plan to be produced post consent, |

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| | | as secured by **Requirements 5 and 6 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**. This will ensure appropriate soil restoration occurs following construction works. The soil reinstatement will be undertaken in accordance with **paragraph 1.7.62-1.7.65 of the Outline Soil Management Plan (Document 5.3.3E) [APP-098]**, assessed on a location-by-location basis depending on the soil survey data.<br><br>National Grid notes the concern from the Landowner around disruption for agricultural and research activities. As part of the consultation feedback National Grid are aware that the University of Leeds is involved in different research activities, although the Landowner has explained it is not possible at this stage to confirm what research activities will be undertaken at the time of construction. However, any impacts on agricultural and research activities would be mitigated by the engagement of a Land officer/ALO who will liaise directly with the University in relation construction activities. **Paragraph 1.3.7 of the Outline Soil Management Plan (Document 5.3.3E) [APP-098]** confirms that the Land Officer/ALO will communicate the Project's daily construction activities to Landowners to reduce any conflict. The Land Officer/ALO will ensure access will not be restricted to Landowners during busy periods and normal agricultural activities can continue. For Pre-commencement works, the **Outline Soil Management Plan (Document 5.3.3E) [APP-098]** is secured in **Requirement 5(3) of the draft Development Consent Order (Document 3.1(B)) [AS-011]** and for all works post-commencement, it is secured in the Soil and Aftercare Management Plan by **Requirement 6(1)(a) of the draft Development Consent Order (Document 3.1(B)) [AS-011]**. **Paragraph 1.1.4 of the Outline Soil Management Plan (Document 5.3.3E) [APP-098]** explains that the detailed Soil and Aftercare Management Plan will be based on the Outline Soil Management Plan. |

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## 2.12 RR-012 [Carter Jonas LLP on behalf of William Robert Strawson]

Table 2.12 – RR-012 [Carter Jonas LLP on behalf of William Robert Strawson]

| Response Reference | Relevant Representation Issue | National Grid Response |
|---|---|---|
| 12.1 | The project impacts land which is within the ownership of my client Mr Strawson. I am therefore registering their interest to be kept informed of any developments and to enable comments to be made in due course if required. | National Grid notes this comment and will continue to engage with the Landowner. A meeting was held with the landowner's agent on 10 March 2023 at which all comments raised in this representation were discussed as well as updates regarding the project. |
| 12.2 | The main points of concern regarding the proposals at present relate to the time and nature of access, appropriate access routes and compensation and appropriate restoration following any works. It is considered important that works are undertaken in the most appropriate way to minimise disruption for agricultural activities on the ground. This land is subject to a tenancy and therefore the main impact will be upon the tenant, Mr Lawson. | The Applicant notes the issues raised by the agent and has sought to address these points of concern below.<br><br><u>Time and Nature of Access</u><br>With regard to access routes and nature of access routes, these have been developed through the non-statutory and statutory consultation process of the Project. National Grid will continue to engage with the Landowner to reduce the impact of these where possible. National Grid will use a Land Officer/ALO to provide information and communications to local landowners and those with land-related interests regarding daily construction activities to minimise disruption to agricultural activities, as detailed at **Paragraph 1.3.7** of the **Outline Soil Management Plan (Document 5.3.3E) [APP-098]** which is secured by **Requirement 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** and is a certified document listed within article 48. |

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| | | Appropriate Access Routes<br>The access routes have been designed as far as possible to utilise existing farm tracks. The access points with routes are shown on **Sheets 3 of 5 of the Access Rights of Way and Public Rights of Navigation Plan Section B (Document 2.7.2) [APP-027]**. The use of existing farm tracks where possible will minimise damage to agricultural land and avoid the need to create additional access routes.<br><br>Compensation<br>National Grid is obliged to compensate all owners and/or occupiers where land is required permanently or temporarily and where rights are required in land. National Grid has offered voluntary terms to the landowner that are considered to exceed entitlement under statutory provisions. If voluntary terms cannot be agreed and powers exercised, then National Grid will be obliged to pay statutory compensation for the compulsory acquisition of land or rights under the foregoing powers. Compensation is also payable for loss or damage caused by the exercise of any power of temporary use of land. Any dispute in respect of the compensation payable is to be by the Lands Chamber of the Upper Tribunal as set out at **paragraph 6.4.4 of the Statement of Reasons (Document 4.1) [APP-069]**.<br><br>Soil Restoration<br>As part of the construction and reinstatement works of the Project, National Grid will adhere to **ES Chapter 3 Appendix 3E Outline Soil Management Plan (Document 5.3.3E) [APP-098]**and the Soil and Aftercare Management Plan to be prepared and approved under **Requirement 6 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** to ensure the appropriate soil restoration measures are undertaken. The soil reinstatement will be concluded as per **paragraphs 1.7.62-1.7.65 of ES Chapter 3 Appendix 3E** |

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| | | **(Document 5.3.3E) [APP-098]**. The soil will be assessed on a location-by-location basis depending on the soil survey data.<br><br>National Grid will use a Land Officer/ ALO to minimise disruption for the agricultural activities through daily updates to the Landowner and/or Tenant.<br><br>National Grid is obliged to compensate all owners and occupiers of land taken for temporary possession to carry out the authorised development for any loss or damage arising from the exercise of rights in relation to the land and the obligation is secured under the proposals set out.<br><br>To confirm National Grid has been liaising with both the Landowner and the Tenant, Mr Lawson in respect of the Project. |

## 2.13 RR-013 [Charles Waite and Co Ltd on behalf of Mr Roger Ingham]

Table 2.13 – RR-013 [Charles Waite and Co Ltd on behalf of Mr Roger Ingham]

| Response Reference | Relevant Representation Issue | National Grid Response |
|---|---|---|
| 13.1 | 1. There is an historic dispute with National Grid regarding their existing apparatus on the property. | National Grid is aware of the landowner's historic dispute in relation to the right of access over his land, and whilst it has not been as a result of this Project, the project team has offered to facilitate dialogue with the wider National Grid business, and has engaged with all parties involved in order to seek to reach a suitable solution for all. |
| 13.2 | 2. Objection to the proposed works on the property due to close proximity to residential properties. | National Grid has considered its potential impact on the residential property at Red Brick Farm, both during construction and operation, in terms of noise, dust and visual amenity. The visual effects of the Project upon the residents of Red Brick Farm are considered at **Table 6G.68 of Appendix 6G Visual Receptor Assessment (Document 5.3.6G) [APP-144]**. The assessment concludes that there would be a Major/Moderate and Adverse effect during the construction period that would be Significant with changes including views of the temporary scaffolding over Garnet Lane in the context of the existing overhead line, views of changes associated with existing pylon XC480 and views of the construction of the 33kV undergrounding. Construction Effects would be minimised by the measures outlined in **Table 3.2 of Appendix 3B Code of Construction Practice (Document 5.3.3B) [APP-095]**, with measure LV02 covering temporary lighting and measure LV04 covering vegetation reinstatement. Other measures designed to minimise adverse effects on residential visual amenity include restrictions on construction working hours as set out in in **Requirement 7 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**. |

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| | | During the Operational Phase, pylon XD001 is slightly closer than the existing XD001T pylon it replaces and approximately 15.5m taller but would be located circa 400m from the dwelling of Red Brick Farm. With reference to Zone of Theoretical Visibility Studies at **Figure 6.6 of (Part 5 of 15) ES Chapter 6 Landscape and Visual Figures (Document 5.4.6) [APP-171]** and the photomontage at Viewpoint 19 in **Figure 6.59b of Part 12 of 15 ES Chapter 6 Landscape and Visual Figures** (**Document 5.4.6) [APP-178]**, the Cable Sealing End Compounds (CSECs) are predicted to be screened by intervening planting at ground floor level (an access request to the curtilage of the property for visual assessment purposes was refused by the Landowner). The assessment concludes that given the changes in infrastructure would be predominantly screened by retained planting from the dwelling and the changes would be perceived in the context of much closer and more prominent existing pylons, the Moderate Adverse effect predicted would be Not Significant.<br><br>**ES Chapter 13: Air Quality (Document 5.2.13) [APP-085]** considers the effects of dust emissions from construction activities in the Tadcaster Area. Red Brick Farm falls within 350m of the boundary of the construction working area (Order Limits) and therefore has been considered as a receptor within the assessment in line with the Institute of Air Quality Management (IAQM) (2016) Guidance on the Assessment of Dust from Demolition and Construction screening criteria. The assessment concluded that the risk of dust soiling and human health effects from demolition, earthworks, construction and trackout was low (see **Table 13.16 of ES Chapter 13: Air Quality (Document 5.2.13) [APP-042]**). This finding has informed the dust management measures that would be implemented as part of the Project (see **Table 13.20 of the ES Chapter 13: Air Quality** (**Document 5.2.13) [APP-042]**). |

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| | | These measures are expected to ensure that the risk of impact is reduced to negligible levels and are described in the **Code of Construction Practice (Document 5.3.3B) [APP-095]**, which would be implemented via **Requirement 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br>Noise sources relating to construction works and construction road traffic have been considered in the **ES Chapter 14: Noise and Vibration** (**Document 5.2.14) [APP-086]**.<br><br>The noise climate around Red Brick Farm was measured and is reported in the Environmental Statement **Appendix 14A Baseline Noise Report (Document 5.3.14A) [APP-150]** and the monitoring location identifier TD1 specifically relates to this location. In the **ES Chapter 14: Noise and Vibration** (**Document 5.2.14) [APP-086]**, the representative locations SEL09 and SEL10 have been used to evaluate noise for this receptor. These locations are shown on **Figure 14.1, Sheet 4 of 6 of ES Chapter 14 Noise and Vibration Figures (Document 5.4.14) [APP-153]**.<br><br>Construction noise is fully evaluated within Environmental Statement **Appendix 14C Construction Modelling Results** (**Document 5.3.14C) [APP-152]**. The noise assessment is based on worst case construction plant assumptions and assumes that several construction activities take place at the same time. In reality, these activities may not overlap during the construction works. As summarised in **Table 14.34 of ES Chapter 14: Noise and Vibration (Document 5.2.14) [APP-086]**, noise effects from construction activities for this receptor (SEL09, SEL10) would not be significant with the implementation of the embedded measures outlined in **Table 14.9 of ES Chapter 14 Noise and Vibration (Document 5.2.14) [APP-086]** including in **Appendix 14D Acoustic** |

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| | | **Screening Strategy (Document 5.3.14D) [APP-153]**. That does not mean that the construction works would be inaudible, but it is considered that amenity in relation to Red Brick Farm will not be significantly lowered for the duration of the construction phase. The measures outlined would be implemented through the **Code of Construction Practice (Document 5.3.3B) [APP-095]** and **Appendix 3H Noise and Vibration Management Plan (Document 5.3.3H) [APP-101]**, both of which would be implemented via **Requirement 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br>Road traffic during the construction phase was evaluated for its potential to give rise to changes in road noise generation relative to the existing baseline. The changes in traffic noise around Red Brick Farm (on the A64, A659 and surrounding network) would be negligible during the construction phase (see **Table 14.27 of ES Chapter 14 Noise and Vibration (Document 5.2.14) [APP-086]**). |
| 13.3 | 3. There is potential blight of the property due to the proposed works. | National Grid has considered the potential for blight in relation to the Landowner's holding and does not consider that this is likely in this location. Blight has a statutory definition (as set out in Chapter II and Schedule 13 of the Town and Country Planning Act 1990). National Grid does not consider the impact of the Project would meet the statutory definition (as it relates to only part of the Landowner's interest) and in any event the Landowner has not demonstrated any reasonable attempts to sell the property and been unable to do so at a price substantially less than that which he might be expected to sell as a result of the proposed works (see section 150 of the Town and Country Planning Act 1990). |

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| 13.4 | 4. There is inaccurate information in some of the project documents | National Grid is not aware of inaccurate information contained within the Application documents, but will seek to engage further with the Landowner and his agent to request that they identify precisely the inaccurate information referred to. Once identified, this can be considered further by National Grid and, if necessary, any relevant documentation revised. |
| 13.5 | 5. Objection to the freehold purchase of all the land required due to some of the retained land being severed. | National Grid included all of the Landowner's land to the west of the Tadcaster Tee East Cable Sealing End Compound (CSEC) due to the restricted access from the retained land on completion of the works. This has been discussed with the Landowner and his agent, and no objection received to the proposal. Offers to purchase the land have been made on this basis and a counter proposal received which included the subject land.<br><br>Should the Landowner wish to retain the land despite its restricted accessibility, then National Grid would be willing to agree not to proceed with the acquisition in this part of the Order limits.<br><br>National Grid will seek to engage further with the Landowner in relation to this matter. |
| 13.6 | 6. Objection due to the lack of confirmation of future land use of some of the land to be taken | As explained in 31.5 above, the land west of the Tadcaster Tee East CSEC has not been included for operational purposes. The land is currently cultivated for a Christmas tree crop. The extent of the proposed underground services proposed as part of the Project in this area and associated easement mean that tree planting within this area would not be feasible following the construction phase of the Project. National Grid's intention would be to utilise the land for Green Infrastructure comprising species rich grassland, bordered by a new species rich |

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| | | hedgerow along the boundary with the highways land to facilitate partial screening of the eastern CSEC in views obtained from the A64 corridor. The Outline Landscape Mitigation Strategy is illustrated on Figure 3.11 of ES Chapter 3 Description of the Project Figures **(Document 5.4.3) [APP-164]** and secured under **Requirements 8 and 9 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**. |
| 13.7 | 7. Difficulties to contacting project personnel to discuss issues in a timely manner. This includes the proposed land take verses the grant of easements. | National Grid is keen to progress negotiations with the Landowner and is grateful for the positive nature with which they have been undertaken to date. The most recent counter proposal from the Landowner's agent has required further consideration by National Grid in order to attempt to find a mutually acceptable solution. National Grid and their agents have spoken with the Landowner's agent a number of times in this period to explain this, and has now been in contact with the landowners agent to provide a revised offer. |
| 13.8 | Mr Ingham would like to add: - I have an ongoing dispute with National Grid - The proposed works are close to my house - I do not think I will be able to sell my property in the future due to the project. - I understand that some of the project documents are not accurate. - I do not want all the land required by the project to be taken. May consider granting of easement. - Difficulties discussing issues with the project team. - Concerns as to the future use of the land to be taken by National Grid. | As per responses 13.1 to 13.7, National Grid remains willing to engage further with the Landowner and his agent and will seek to resolve concerns as far as practicable. National Grid is grateful for the Landowner's willingness to engage to date.<br><br>The landowner's agent attended Issue Specific Hearing 1 on 23 March 2023 and asked questions about the alternatives considered in the siting of new infrastructure. It was agreed that National Grid would send the agent a list of documents to show where this is detailed within the application documents. |

## 2.14 RR-014 [Douglas John Fletcher]

Table 2.14 – RR-014 [Douglas John Fletcher]

| Response Reference | Relevant Representation Issue | National Grid Response |
|---|---|---|
| 14.1 | Loss of Amenity. Impact of loss of Green Belt. Impact on local highways whilst work is being done. Noise impact on local community. Dust impact on local community. Loss of green belt vista from Butts Lane. | National Grid notes the points made by the Interested Party. All matters raised have been addressed below in the order provided within the Relevant Representation, except for loss of Amenity. This has been addressed at the end of this response as part of the health and wellbeing assessment, which drew on the assessments conclusions conducted in the Environmental Statement Chapters for Noise, Air Quality and Landscape and Visual. National Grid is in the process of engaging with this Interested Party to discuss the potential environmental effects of the Project and provide signposting information on the environmental assessments undertaken. The Interested Party attended the Preliminary Meeting, Open Floor Hearing and Issue Specific Hearing on the 22 and 23 March, it was agreed in person that a meeting would be set up at which National Grid would discuss further the matters raised in this representation and at the hearings. Communications are taking place to establish a date for this meeting.<br><br><u>Loss of Green Belt</u><br>A Green Belt assessment has been carried out as part of the application process, and this is included in p**aragraphs 7.3.59-7.3.105 and 7.4.7-7.4.17** of the **Planning Statement (Document 7.1) [APP-202]**.<br><br>It sets out how due regard has been had to the impacts of the development on the Green Belt. It identifies that overhead lines are considered engineering operations, which may not be |

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| | | considered inappropriate development. However, it recognises that associated infrastructure such as substations and Cable Sealing End Compounds (CSECs) may be considered inappropriate in the Green Belt.<br><br>Where this is the case, the landscape and visual impact assessment has carefully considered the visual impact of the Project on the landscape and receptors in it and identified mitigation measures where relevant. This is of particular importance around the substation locations where planting has been identified to reduce significant effects.<br><br>Where the Project is considered to comprise inappropriate development in the Green Belt (i.e. in relation to the substation and cable sealing end compounds), regardless of the level of harm, very special circumstances have been demonstrated that overcome the harm by nature of inappropriate development, together with any other harm to the Green Belt. The urgent and compelling needs case in terms of the shift in national energy need, the requirement to meet Net Zero by 2050, and the support that Yorkshire GREEN provides for the movement of energy from renewable sources, is considered to amount to very special circumstances that outweigh the limited harm to the Green Belt that would arise from the Project.<br><br><u>Impact on local highways</u><br>As part of the DCO process a thorough assessment of the likely impact of the Project on traffic on the local road network and highway assets during the construction phase of works has been carried out. The assessment, including details of the quantum of movements and the destination of trips, can be found in the **ES Chapter 12 Traffic and Transport (Document 5.2.12) [APP-084]**, with the results summarised in **Section 12.9** of that document. |

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| | | The **ES Chapter 12 Traffic and Transport (Document 5.2.12) [APP-084]** assessed the impact of traffic during the construction period in terms of percentage increases in traffic volume on the local road network, as summarised in **Table 12.28** of that document. Local roads with percentage traffic increases above a set threshold were subject to detailed assessment in terms of: severance, driver delay, pedestrian amenity, pedestrian delay, pedestrian fear and intimidation and accidents and safety. It was concluded that there would not be any significant traffic and transport impacts, during the construction period, as set out in **Section 12.9 of the ES Chapter 12 Traffic and Transport (Document 5.2.12) [APP-084]** and summarised in **Table 12.36**.<br><br>Construction traffic will be managed, in order to minimise the effects on existing road users, via **the ES Chapter 3 Appendix 3F Construction Traffic Management Plan (CTMP) (Document 5.3.3F) [APP-099]** and **ES Chapter 3 Appendix 3B Code of Construction Practice (Document 5.3.3B) [APP-095]**. The CTMP and CoCP have been submitted as supporting documents to the Development Consent Order (DCO) and would be secured by **Requirement 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br>As detailed in **Table 4.2** (Local road routes from SRN to construction access points) of the **CTMP (Document 5.3.3F) [APP-099]** National Grid has committed to the following measure for construction traffic which is a left in/left out turning at the A63/ Rawfield Lane junction. The CTMP is secured via **Requirement 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011].** This means construction traffic exiting Butts Lane will not be able to cross the junction into Rawfield Lane, and will have to travel to the roundabout and enter Rawfield Lane via a left turn. Construction traffic can also not cross the junction from Rawfield Lane to Butts Lane, and |

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| | | instead will have to turn left out of Rawfield Lane and travel to the roundabout, and enter Butts Lane via a left turn.<br><br><u>Noise impact on local community</u><br>Noise sources relating to construction works and construction road traffic, and the operation of the new Monk Fryston Substation have been considered in the **ES Chapter 14: Noise and Vibration (Document 5.2.14) [APP-086]**.<br><br>The noise climate in Lumby was measured, as reported in the Environmental Statement **Appendix 14A Baseline Noise Report (Document 5.3.14A) [APP-150]** and the monitoring location identifier MF4 specifically relates to this location (Field south of Red Hill Lane, to the west of The Orangery at Lumby Hall). The data from the noise survey was used to inform the design of the new Monk Fryston Substation.<br>In the **ES Chapter 14: Noise and Vibration (Document 5.2.14) [APP-086]**, the representative location SEL15, The Cottage, Butts Lane, Lumby (located at British National Grid reference 448607,430132) has been used to evaluate noise for the wider Lumby community.<br><br>Construction noise is fully evaluated within the Environmental Statement **Appendix 14C Construction Modelling Results (Document 5.3.14C) [APP-152].** In summary, the worst case noise levels (without mitigation) were significantly below the threshold of significance at the representative location for all times of the day and night and the assessment included worst case plant assumptions and accumulation of noise levels from several construction activities that may not overlap. As such, the assessment is considered to be conservative and predicted levels higher than will likely be experienced in practice.<br><br>That does not mean that the construction works will be inaudible, but it is considered that amenity in relation to noise |

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| | | will not be significantly lowered in Lumby for the duration of the construction phase.<br><br>The assessment evaluated the operational noise from the proposed Monk Fryston Substation, the assessment was undertaken in accordance with British Standard 4142, the industry best practice. The result of the assessment was that the highest predicted noise levels from the new substation at Lumby were significantly below a level considered to give rise to no observable effect. It is very unlikely that the new substation plant will be audible at Lumby.<br><br>Road traffic during the construction phase was evaluated for its potential to give rise to changes in road noise generation relative to the existing baseline. The changes in traffic noise around Lumby (on the A63 and surrounding network) are negligible during the construction phase. There may very short-term noticeable increases in traffic noise on Butts Lane during construction of bell mouth and access to pylon XC520 adjacent to A1(M), but these are not considered significant and are only present during those activities.<br><br><u>Dust impact on local community</u><br>Dust sources relating to construction activities and the construction access roads have been considered in the **ES Chapter 13: Air Quality (Document 5.2.13) [APP-085]**.<br><br>In the **ES Chapter 13: Air Quality (Document 5.2.13) [APP-085]** dust emissions from construction activities were assessed. The dust assessment considered three main construction areas, including the Monk Fryston Area. The assessment has considered residential properties along Butts Lane, Lumby as they fall within 50m of the site haul route 500m from the access point that would be used by construction traffic to access the proposed works at Monk Fryston. This is in line with the |

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| | | Institute of Air Quality Management (IAQM) (2016) *Guidance on the Assessment of Dust from Demolition and Construction* screening criteria, considered the industrial standard for assessing dust.<br><br>Dust soiling effects on people and property in relation to construction traffic using the construction access roads, including Butts Lane, was fully evaluated in the **ES Chapter 13: Air Quality (Document 5.2.13) [APP-085]**. The assessment concluded that with no mitigation in place the risk of dust soiling from construction traffic is medium. This finding that without dust controls there would be a medium risk of impact has informed the dust management measures that would be implemented as part of the Project (see **Table 13.20 of ES Chapter 13: Air Quality (Document 5.2.13) [APP-085]**) and these measures are expected to ensure that the risk of impact is reduced to negligible levels.<br><br><u>Landscape - Loss of green belt vista from Butts Lane</u><br>It is National Grid's view that there would be no 'loss' of any "green belt vista from Butts Lane" where some views in the direction of the Project are already affected by the existing substation and pylons.<br><br>An additional photomontage and visual assessment will be prepared from Butts Lane at the location requested by the Examining Authority that is approximately 200m north of Viewpoint 25 on the A63, which will be submitted to Examination at Deadline 2.<br><br>The changes as a result of the Project during the operational phase at Year 1 and Year 15 from Viewpoint 25 on the A63 are illustrated in Figures 6.65 and 6.67 within **(Part 14 of 15) ES Chapter 6 Landscape and Visual Figures (Document 5.4.6) [APP-180].** The assessment from Viewpoint 25 is set out in |

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| | | **Table 6H.27** of the ES **Appendix 6H Viewpoint Assessment (Document 5.3.6H) [APP-115]**.<br><br>The assessment at Viewpoint 25 from the A63 (not Butts Lane) concluded a Major/Moderate adverse and Significant effect during the construction phase and a Moderate and Not Significant visual effect during Operational Phase (Year 1 and Year 15).<br><br>Landscape and visual mitigation measures including earth mounding and woodland planting to the north of the Monk Fryston substation, are detailed in the Outline Landscape Mitigation Plans in **ES Chapter 3: Description of the Project Figures (Document 5.4.3) [APP-164]** and secured under **Requirements 8 and 9 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br><u>Health and wellbeing – loss of Amenity</u><br>Consideration of the potential for effects arising from the Project on neighbourhood amenity as a determinant of the health and wellbeing of local residents is presented in **Section 15.9 of ES Chapter 15: Health and Wellbeing (Document 5.2.15) [APP-087]**. This is set out as part of the assessment of Noise, Air Quality and Landscape Amenity effects. The assessment drew on the conclusions of the assessments conducted in **ES Chapter 13: Air Quality (Document 5.2.13) [APP-085]**, **ES Chapter 14: Noise and Vibration (Document 5.2.14) [APP-086]**, and **ES Chapter 6: Landscape and Visual (Document 5.2.6) [APP-078]**.<br><br>The overall effect of the Project on neighbourhood amenity during construction was assessed to be neutral on account of the low risk that changes in air quality and/or noise and vibration resulting from the construction of the Project would |

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| | | pose to human health. Although a number of receptors would experience adverse effects relating to landscape amenity, these effects will be temporary in nature and would be managed through the use of best practicable means included in the outlined in **Appendix 3B Code of Construction Practice (CoCP) (Document 5.3.3B) [APP-095]** and secured under **Requirements 8 and 9 of the draft Development Consent Order (DCO) (Document 3.1(B)) [AS-011]**.<br><br>During operation, the overall effect of the Project on neighbourhood amenity was assessed to be neutral. Any effects on landscape amenity would be managed through embedded environmental measures outlined in **Table 6.8 of ES Chapter 6: Landscape and Visual (Document 5.2.6) [APP-078]** and secured under **Requirements 3, 8 and 9 of the draft Development Consent Order (Document 3.1(B)) [AS-011].** Additional landscape and visual mitigation measures are detailed in the Outline Landscape Mitigation Plans in **ES Chapter 3: Description of the Project Figures (Document 5.4.3) [APP-164]** and secured under **Requirements 8 and 9 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br>Effects on air quality would be managed through measures outlined in **Table 13.20** of **ES Chapter 13: Air Quality (Document 5.2.13) [APP-085]** and secured under **Requirements 5 and 6 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br>Effects on noise and vibration would be managed through embedded measures outlined in **Table 14.9 of ES Chapter 14: Noise and Vibration (Document 5.2.14) [APP-086]** and secured under **Requirements 3 and 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**. |

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| | | Additional noise and vibration mitigation measures are detailed in ES **Appendix 3H Noise and Vibration Management Plan (Document 5.3.3H) [APP-101]** and secured under **Requirement 16 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**. |

## 2.15 RR-015 [Foss (2008) Internal Drainage Board]

Table 2.15 – RR-015 [Foss (2008) Internal Drainage Board]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 15.1 | Thank you for sending the supporting information for the proposed National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order. This is one of a two responses from Internal Drainage Boards who are Members of the York Consortium of Drainage Boards. We have reviewed the information provided and established the relevant locations which are in the Foss (2008) Internal Drainage Board District from the maps provided : - Section A – Sheet 1 | National Grid acknowledge receipt of the relevant representation from the Foss Internal Drainage Board (FIDB) and has provided detailed responses to the specific matters raised therein below. |
| 15.2 | The details provided called Section A Sheet 1 highlights Osbaldwick Substation which is very close to the Boards maintained drains Murton Station Dyke and Bedale Avenue. The Board notes at this location the red line boundary is shown which cross these watercourses and gives indications of linear and non-linear work. At this stage specific details of the work to be carried out is not available. | Most of the works to be carried out at Osbaldwick Substation are within the current substation boundary, as described in **Section 3.4 of ES Chapter 3 Description of the Proposed Development (Document 5.2.3) [APP-075]**, with further detail of the proposed works shown in **Figure 3.1 of the ES Chapter 3 Description of the Project Figures (Document 5.3.4(B)) [AS-017]**. These works do not involve any increase to the current extent of impermeable surfaces or alterations to substation drainage and, therefore, will not have any impact on nearby watercourses arising from new discharges of surface water.<br><br>It is acknowledged that the Order Limits (red line boundary) extend north of the substation along the YR overhead line, and encompass the first two pylons along this line (YR001A and YR002), plus access to and from Murton Way. This part of the Order Limits crosses the IBD-maintained Murton Station Dyke watercourse between the two pylons. Most of the works will take place at the closest pylon to the substation (YR001A). |

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| | | Access to this pylon will be taken via the main substation access road (which crosses the Murton Station Dyke via an existing culvert) and an existing access track which runs between the substation boundary fence to the south and the Murton Station Dyke to the north. No upgrade works are required to this access track for the Project. The span back to YR002 is only included within the Order Limits to apply temporary earthing tapes to the YR002 pylon for the duration of the works. Access to YR002 will be taken from Murton Way to the north. No access track will be required between the two pylons across the Murton Station Dyke. Therefore there is no scope for impacts on the watercourse as a result of works at YR001A and YR002. |
| 15.3 | The Board is concerned about the positioning of the future assets so maintenance of these watercourses can be sustained. This work directed by the Board requires the use of heavy machinery such as tracked excavators and tractors for channel maintenance. To facilitate this the Board not only requires maintenance access along the maintained ditch but also access to unload and move the equipment to the location. The Board needing to be able to obtain and maintain safe access to these watercourses both now, during the construction process and on completion of the work in the future. The Board byelaws and compliance covers these objectives. | As per the response to 15.2 above, the works in and around Osbaldwick Substation will not impinge on watercourses in its vicinity. Access to, and along watercourses will not be affected. Further to this, no change is proposed to the current ground clearance of the overhead lines.<br><br>National Grid confirms it is not seeking to disapply the byelaws that allow FIBD to achieve their objectives relating to this matter. |
| 15.4 | The Board also seeks that any development on the site includes effective control and attenuation of runoff. The Board requests this complies with the requirements of the Planning Authority and its planning conditions which at this location is the City of York Council. In addition within the Boards Drainage District any outfall discharging to any ordinary watercourse along with any of our ‘maintained’ watercourses will require the consent of the | As per the response to 15.2 above, there will be no extension of impermeable areas or alternation of existing drainage systems as a result of works in and around Osbaldwick Substation, and therefore no increase in runoff to watercourses in its vicinity. |

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| | Board. The Boards 'maintained' watercourses being highlighted on the Boards Drainage District map which is available on our website. | |
| 15.5 | GUIDANCE ON THE BOARD'S CONSENT<br>The following highlights the details of the Boards consent requirements which are as follows : Under the Land Drainage Act 1991 and the Boards' byelaws, the Board's prior written consent (outside of the planning process) is needed for:- a. any connection into a Board maintained watercourse, or any ordinary watercourse in the Board's district. b. any discharge, or change in the rate of discharge, into a Board maintained watercourse, or any ordinary watercourse in the Board's district. This applies whether the discharge enters the watercourse either directly or indirectly (i.e. via a third party asset such as a mains sewer). c. works within or over a Board maintained watercourse, or any ordinary watercourse in the Board's district – for example, land drainage, an outfall structure, bridges, culverting etc. d. any proposed works or structures in, under, over or within 9 metres of the top of the bank of any watercourse. Please note that the Board does not, generally, own any watercourses and the requirement to obtain the Board's consent is in addition to obtaining consent from any land owner or other authority to carry out the relevant works. Full details of the Consent process can be found on our website:- http://www.yorkconsort.gov.uk | National Grid notes FIDB's guidance on consenting requirements for ordinary watercourses in their district. However, no requirements for Land Drainage Consents are anticipated in connection with the proposed works in and around Osbaldwick Substation. |
| 15.6 | DRAFT DCO PART 4 SUPPLEMENTAL WORKS<br>In relation to the documentation the supplemental powers 19 Discharge of water we note that Internal Drainage Boards have powers from the Land Drainage Act 1991. In 19 clause (3) consent for watercourses is required of the person to whom it belongs. The Board seeks confirmation that belongs includes the Board and | National Grid acknowledges FIDB's comments on Article 19(3) and 19(5) of the **draft Development Consent Order (Document 3.1(B)) [APP-011]**. National Grid is currently reviewing Article 19 and will continue to engage with FIDB in relation to this matter. |

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| | its powers to consent under the Land Drainage Act 1991. The Board would also seek that our maintained watercourses are protected in the same way as designated ‘Main River’ in 19(5). We however would also add to this clause unless otherwise consented under the relevant legislation which for IDB’s is the Land Drainage Act 1991. The Board’s comments have been made following consideration of the information provided. If you have any queries on the above matter then please do not hesitate to contact the Board for further information. | |

## 2.16 RR-016 [George F White LLP on behalf of Mark Godliman]

Table 2.16 – RR-016 [George F White LLP on behalf of Mark Godliman]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 16.1 | As a landowner, our client wishes to remain informed as to progress with the scheme. | National Grid notes this and will continue to keep the Landowner up to date with the Project. |
| 16.2 | Concerns relating to access, site damage and long term restrictions on their holding. | The Landowner recently purchased this holding from a neighbour and has sought to develop the buildings and improve the land to incorporate an equestrian enterprise. Historically National Grid has accessed its infrastructure via an existing access through the farmstead but, following the severing of this part of the holding and the Landowner's development works, that access is no longer considered by the Landowner as appropriate. National Grid undertook a targeted consultation exercise with the Landowner, and the neighbouring landowner from whom the holding was purchased, to consult on an alternative access route which will limit the impact upon the Landowner's development.<br><br>Following the initial offer of terms issued on the 25 August 2022, at a site meeting with the Landowner and their agent on Thursday 02 February 2023 the below points were discussed:<br><br><u>Access</u><br>The proposed access route to the works is shown on **Sheets 2 and 3 of 9 of the Access Rights of Way and Public Rights of Navigation Plan Section C (Document 2.7.3) [APP-028]**. The Landowner has proposed an alternative access route |

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| | | during the construction and operational phase of the Project which National Grid will review and consider.<br><br>Site Damage<br>National Grid will ensure that all works are undertaken in accordance with **Appendix 3B Code of Construction Practice (Document 5.3.3B) [APP-095]**. Table 3.7 of that document sets out the proposed Good Construction Practice Measures relating to Agriculture and Soils and this has been prepared having regard to the DEFRA (2011) Code of Practice for the Sustainable Use of Soils on Construction Sites[1]. **Table 3.7 of Appendix 3B Code of Construction Practice (Document 5.3.3B) [APP-095]** provides that all land subject to disturbance within the Order Limits will be subject to a detailed survey to record baseline conditions against which future reinstatement can be monitored. To ensure minimised site damage and disturbance and to monitor compliance with **Appendix 3B Code of Construction Practice (Document 5.3.3B) [APP-095]** National Grid will use a Lands Officer/Agricultural Liaison Officer (ALO) to monitor and minimise disruption for the agricultural activities through communications to local landowners and those with land-related interests regarding daily construction activities.<br><br>Long Term Restrictions<br>The current land use is primarily pasture/grazing land and the Landowners already has existing infrastructure on their property. National Grid is not proposing any additional infrastructure at this location which would further restrict the |

[1] DEFRA (2009) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Online) Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69308/pb13298- code-of-practice-090910.pdf (Accessed 10 March 2023)

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| | | Landowner beyond the restrictions that exist at present. The proposal is to have an easement that would continue with the existing restrictions on the holding in perpetuity. Although the existing infrastructure may cause some minor inconvenience to the Landowner it is considered that the easement payment being offered by National Grid compensates for this. Any short-term disturbance caused during the construction phase will be managed in accordance with **Appendix 3B Code of Construction Practice (Document 5.3.3B) [APP-095]**. |

## 2.17 RR-017 [George F White LLP on behalf of The Midgley Family]

Table 2.17 – RR-017 [George F White LLP on behalf of The Midgley Family]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 17.1 | As a landowner, our client wishes to remain informed as to progress with the scheme. | National Grid notes this and will continue to keep the Landowner up to date with the Project. |
| 17.2 | Concerns relating to access, site damage and long term restrictions on their holding. | Following the initial offer of terms issued on the 25 August 2022, at a site meeting with the Landowner and their agent on Thursday 02 February 2023 the below points were discussed:<br><br>Access<br>The proposed access route to the works is shown on **Works Plan Section C (Document 2.6.3) [APP-022]** (Drawing Refs DCO_C/WO/PS/02 & DCO_C/WO/PS/03) and **Sheets 2 and 3 of 9 of the Access Rights of Way and Public Rights of Navigation Plan Section C (Document 2.7.3) [APP-028]**. Historically National Grid have accessed their infrastructure via an existing access through the farmstead however part of the holding was sold and National Grid undertook a targeted consultation exercise with the Landowner and the purchaser, to agree an access which will limit the impact upon the purchaser's development of the land acquired. The Landowner has agent proposed an alternatives access route during the construction and operational phase of the Project to the works which National Grid will review and consider.<br><br>Site Damage<br>National Grid will ensure that all works are undertaken in accordance with **Appendix 3B Code of Construction** |

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| | | **Practice (Document 5.3.3B) [APP-095]**. Table 3.7 of this document sets out the proposed Good Construction Practice Measures relating to Agriculture and Soils and this has been prepared having regard to the DEFRA (2011) Code of Practice for the Sustainable Use of Soils on Construction Sites[2]. **Table 3.7 of Appendix 3B Code of Construction Practice (Document 5.3.3B) [APP-095]** provides that all land subject to disturbance within the Order Limits will be subject to a detailed survey to record baseline conditions against which future reinstatement can be monitored. To ensure minimised site damage and disturbance and to monitor compliance with the **Code of Construction Practice (Document 5.3.3B) [APP-095]** National Grid will use a Lands Officer/Agricultural Liaison Officer (ALO) to monitor and minimise disruption for the agricultural activities through communications to local landowners and those with land-related interests regarding daily construction activities..<br><br>Long Term Restrictions<br><br>The current land use is primarily pasture/grazing land and the Landowner already has existing infrastructure on their property. National Grid is not proposing any additional infrastructure at this location which would further restrict the Landowner beyond the restrictions that exist at present. The proposal is to have an easement that would continue with the existing restrictions on the holding in perpetuity. Although the existing infrastructure may cause some minor inconvenience to the Landowner it is considered that the easement payment being offered by National Grid compensates for this. Any short-term disturbance caused during the construction phase will be managed in |

[2] DEFRA (2009) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Online) Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69308/pb13298- code-of-practice-090910.pdf (Accessed 10 March 2023)

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| | | accordance with the **Code of Construction Practice (Document 5.3.3B) [APP-095]**. |

## 2.18 RR-018 [Hambleton District Council], RR-019 [Harrogate Borough Council], RR-032 [North Yorkshire County Council], RR-034 [Selby District Council]

Table 2.18 – RR-018 [Hambleton District Council], RR-019 [Harrogate Borough Council], RR-032 [North Yorkshire County Council], RR-034 [Selby District Council]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 18.1 | The following representation is made on behalf of the Authorities. It is likely that further submissions and in particular the Local Impact Report and Statement of Common Ground will be prepared jointly by the Authorities. The Authorities have no strategic concern and are supportive of the project in principle. It is understood the applicant is keen to submit an early draft of the Statement of Common Ground. Whilst there are still areas of discussion we are confident any issues will be worked through in an effective way. The following represent the current position from key service areas. | National Grid welcomes the Authorities' confirmation that they have no strategic concern regarding the Project and that there is support in principle. National Grid is in continued discussions with the Authorities regarding the preparation of a Statement of Common Ground (SoCG). The SoCG between National Grid and the Authorities will be submitted into the Examination at Deadline 1 as **Document 8.5.2**. |
| 18.2 | **Noise and Vibration 3.11** – it is consistently reported that the Noise and Vibration EIA assessment and methodology has not been raised as a matter for further discussion and therefore it is considered agreed. However, in reference to our previous comments of 5 November 2021 and subsequent email correspondence with WSP Acoustics, several matters were raised and are yet to be agreed. Notably:<br>• Proposed core working hours of 07:00-19:00 Mon to Fri and 08:00-17:00 Sat/Sun/Bank Holidays are not aligned to those considered to safeguard residential amenity during evenings and weekends (i.e. 08:00-18:00 Mon to Fri, 08:00-13:00 Sat, and not at all on Sundays and Bank Holidays). | The core working hours which have been proposed represent the hours needed in order to complete the Project as designed. The Project has a tight construction programme in order to meeting the energisation date of September 2027, with complex outage sequences needed to undertake the works on the existing overhead line. As a result of this, the Project needs the working hours as set out in the **draft Development Consent Order (DCO) (Document 3.1(B)) [AS-011]** to ensure that all works can be undertaken to meet the required earliest in service date (EISD). As stated in the **Updated Need Case (Document 7.4) [APP-205]**, there are significant constraint costs if National Grid do not meet the EISD, and some customers cannot connect until the Yorkshire GREEN Project is energised. |

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| | • I am later informed by email that the intention is to adopt the appropriate core working hours of 08:00-18:00 Mon to Fri, 08:00-13:00 Sat, and not at all on Sundays and Bank Holidays, but seek a mechanism to carry out works that cannot be safely stopped outside of these hours. I would advise that this is not reflective in document 5.2.14 ES Chapter 14: Noise and Vibration (Volume 5).<br>• The intention is to assess operational noise in accordance with document ref: 29 'National Grid (2021). Policy Statement PS(T)134 - Operational Audible Noise Policy for Overhead Lines. National Grid, London'. I am not familiar with this document nor am I able to locate it, but I did raise concerns regarding the overall assessment methodology which are yet to be agreed. Notably, the trigger for Tier 3 assessment being >37dBA without a full understanding of background LA90,T values during rainfall at sensitive receptors. BS4142:2014+A1:2019 assessment methodology should be adopted in its entirety over National Grid criteria.<br>In view of the above, I would advise that Noise and Vibration EIA assessment and methodology was raised as a matter for further discussion and yet to be agreed. | The construction hours for the Project are set out in **Schedule 3, Requirement 7, paragraphs 1 to 3 of the draft Development Consent Order (DCO) (Document 3.1(B)) [AS-011]**:<br>*"(1) Subject to paragraphs (2) and (3) construction works may only take place between 0700 and 1900 Mondays to Fridays and between 0800 and 1700 on Saturdays, Sundays and Bank Holidays.*<br>*(2) Piling operations must take place only between 0800 and 1700 on Mondays to Fridays and 0900 to 1400 on Saturdays."*<br>**Paragraph (3) of Requirement 7** lists exclusions to the core hours as follows:<br>*"(3) The following operations may take place outside the core working hours referred to in paragraph (1) and (2) –*<br>*(a) the jointing of underground cables, with the exception of cable cutting which must take place only during core working hours;*<br>*(b) installation and removal of conductors, pilot wires and associated protective netting across highways, railway lines or watercourses;*<br>*(c) the completion of operations commenced during the core working hours which cannot safely be stopped;*<br>*(d) any highways works requested by the relevant highway authority to be undertaken on a Saturday or Sunday or outside the core working hours;*<br>*(e) oil processing of transformers or reactors in substation sites;*<br>*(f) the testing or commissioning of any electrical plant installed as part of the authorised development;* |

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| | | *(g) the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities;*<br>*(h) start up and close down activities, which may take place one hour immediately prior to or one hour immediately after the core working hours; and*<br>*(i) security monitoring"*<br><br>It is understood that the Environmental Health Officer (EHO) for Selby District Council, as part of the Joint Authorities has identified that their primary concerns with respect to working hours are:<br>• the shoulder periods (covered by **Requirement 7 paragraph 3 clause (h)**); and<br>• the core hours inclusion of Saturday 13:00 – 17:00, Sunday and Bank Holiday, 08:00 -17:00.<br><br>BS 5228-1:2009 + A1:2014 *Code of practice for noise and vibration control on construction and open sites – Part 1: Noise* is the approved code of practice for construction noise enacted under the Control of Pollution Act 1974. With respect to the Project, this document has been used to form the basis of the noise and vibration management plan.<br><br>BS5228 -1 recognises that the longer the duration of activities on a site, the more likely it is that noise from the site will prove to be an issue, assuming that Noise Sensitive Properties (NSPs) are likely to be significantly affected.<br><br>The Relevant Representation contends that the proposed core hours do not align with "*those considered to safeguard residential amenity during evenings and weekends (i.e. 08:00-* |

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| | | *18:00 Mon to Fri, 08:00-13:00 Sat, and not at all on Sundays and Bank Holidays).”*<br><br>The proposed working hours set out in **paragraph 14.8.11 of ES Chapter 14: Noise and Vibration (Document 5.2.14) [APP-086]** are based on the code of practice, BS 5228-1:2009 + A1:2014, which does not specifically define daytime, evening, night-time or weekend periods. Furthermore, the standard does not identify any time period where construction activity would be precluded from a noise perspective. The code of practice does, however, provide an example, in Annex E, of how to consider these periods.<br><br>Annex E does not impose any requirements but makes recommendations on the assessment of noise from construction activity. The method that has been used to assess the Project and on many other construction projects is the “ABC method” described within the standard.<br><br>The construction noise assessment periods presented as an example in the ABC method are:<br>• Daytime: 07:00 – 19:00 weekdays and 07:00 – 13:00 Saturdays;<br>• Evening and weekend: 19:00 – 23:00 weekdays, 13:00 – 23:00 Saturdays, 07:00 – 23:00 Sundays; and<br>• Night-time: 23:00 – 07:00 every day.<br><br>Bank holiday hours are not specifically mentioned in the example time periods, but for the purposes of the proposed Project, they are considered to be equivalent to Sunday hours.<br><br>Thresholds for significance are selected, whereby weekday (07:00 – 19:00), and Saturday morning (07:00 – 13:00) hours |

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| | | benefit from the highest threshold. That is to say that more noise can be tolerated in these hours. The next highest threshold is for evenings (weekday 19:00 – 23:00) and weekend hours (13:00 – 23:00 Saturdays, 07:00 – 23:00 Sundays).<br><br>The most stringent thresholds are applied to the night time period (all days 23:00 – 07:00).<br><br>There are further modifications to the thresholds of significance for each period that depend on the measured ambient noise baseline, but as the Project is predominantly in rural areas, the decision was taken to apply the lowest category of existing ambient sound without undertaking an extensive baseline investigation. This means that the lowest noise thresholds apply in each period for all receptors and is considered to be the most conservative approach to construction noise assessment.<br><br>Therefore, **ES Chapter 14: Noise and Vibration (Document 5.2.14) [APP-086]** has applied the most stringent evening and weekend criteria for all main works and mitigation applied to meet these. The assessment applied reasonable worst case plant assumptions and assumed that noise impacts from activities that the programme could allow to be operating at the same time are additive. Although there are many types of activity that are sequential and would not be operated simultaneously such that the sound levels would accumulate. Therefore, predicted levels are considered to be at the upper end of the range of potential sound emission.<br><br>The threshold values of sound levels, considered by Annex E (Table E1) of BS5228-1 as the onset of significance, form the basis of the construction noise assessment and mitigation recommendations. These threshold values are reproduced |

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| | | within **Appendix 3H Noise and Vibration Management Plan (NVMP) (Document 5.3.3H) [APP-101]**, with construction noise levels managed such that the thresholds of significance are not exceeded. The NVMP is secured under **Requirement 5, paragraph 2(f) of Schedule 3 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br>Fixed location worksites such as the substations, cable sealing end compounds (CSECs) and temporary construction compounds (TCCs) require works to be carried out over longer periods of time and encompass weekend work. For such locations, the more stringent “weekend and evenings” criteria have been used to determine mitigation requirements such that there are no significant residual effects from the works at all times. As such the core hours proposals are considered consistent with the approach proposed in the approved code of practice (BS5228-1).<br><br>Adherence to the NVMP, and the BS5228-1 thresholds of significance structured within this document, is secured under **Requirement 5(2)(f) of the draft Development Consent Order (Document 3.1(B)) [AS-011]**, and as such, it is considered that the worksites will be tightly controlled with mechanisms for additional mitigation to be required where noise generated by the works are higher than the thresholds of significance. As such, it is considered that significant adverse impacts related to noise from the construction works will be avoided. Given this, any restriction of working hours would be considered to be unreasonable and add significant costs to the project and delay the programme.<br><br>The construction programme needed in order to meet the connection date of September 2027 is very tight and requires a significant number of outages to be able to complete the works. |

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| | | These outages need to be booked years in advance and require careful planning to manage the electricity network. There is also a substantial amount of work required to build the substations in order to be ready for the overhead line connections. It is standard within the electricity industry for construction workers to work a ten days on, two days off shift patterns, which allows for the fact that some workers have to travel significant distances to get to the work site and therefore allows for the most efficient use of time. Any restrictions on working hours over the weekend would lead to a shortened working week, with Monday mornings and Friday afternoons being utilised for travel which would reduce the amount of work being undertaken each week and affect the Project programme. Due to the reasons set out above, seven day working patterns are key to ensuring the Project meets the required connection date.<br><br>Many activities on the linear aspects of the project are of a short duration, such that irrespective of the noise levels produced, there is no noise significance from construction activity as the works do not trigger the temporal criterion for significance as discussed in **Section 14.9.17 of the ES Chapter 14: Noise and Vibration (Document 5.2.14) [APP-086]**, i.e. 10 days in any consecutive 15 days or 40 days in 6 months. Mitigation has still been considered for such worksites and applied through **Appendix 3H Noise and Vibration Management Plan (NVMP) (Document 5.3.3H) [APP-101]** where noise levels would be predicted to exceed the threshold values by magnitude at sensitive receptors even though the temporal criteria are not met. Mitigation (including screening or shrouding of activity) is secured via the NVMP under **Regulation 5 paragraph 2(f) of Schedule 3 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**. |

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| | | The core working hours proposed exclude start up and close down activities of up to one hour either side of the core working hours (often referred to as the “shoulder period”). It is understood that the shoulder period is an area of concern raised by the EHO for Selby District Council and reflected in the Joint Authorities’ Relevant Representation.<br><br>It should be recognised that the shoulder period hours are required to cover, generally non-noisy elements of the works as defined in **Schedule 3, Interpretation of the draft Development Consent Order (Document 3.1(B)) [AS011]** such as:<br>*(a) arrival and departure of workforce and staff at site and movement to and from places of work;*<br>*(b) general refuelling of plant;*<br>*(c) site inspections and safety checks;*<br>*(d) site meetings (daily briefings and quiet inspections/walkovers);*<br>*(e) site clean-up (site housekeeping that does not require the use of plant);*<br>*(f) general site maintenance; and*<br>*(g) low key maintenance and safety checking of plant and machinery.*<br><br>The proposed shoulder periods are not to be used to start/finish construction activity outside those discussed above, unless absolutely necessary (i.e. for safety reasons) and in any case the potentially noisy activities that would need to be undertaken in these hours fall under other specified provisions within **paragraph 3(c) of Requirement 7 of the draft Development Consent Order (Document 3.1(B)) [AS-011].** |

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| | | With respect to the overhead line operational noise assessment and methodology, this response is in five parts:<br>1) A signpost to PS(T)134 and its supporting documents.<br>2) An explanation of the derivation of the criteria (trigger values) used in the method and how these have been used in the assessment.<br>3) A description of National Grid's understanding of the >37dBA trigger value mentioned in the representation.<br>4) An explanation of the derivation of background noise levels during rainfall, where these are required.<br>5) A summary of National Grid's position on the use of BS4142:2014+A1:2019.<br><br>1) National Grid Policy Statement PS(T)134 (2021) is included within the Environmental Statement as **Appendix 14F National Grid Policy Statement PS(T)134 (2021) (Document 5.3.14F) [APP-155]**. The supporting technical documents can be found in **Appendix 14G National Grid Technical Report TR(E)564 (2021) (Document 5.3.14G) [APP-156]**; **and Appendix 14H National Grid Technical Guidance Note TGN(E)322 (2021) (Document 5.3.14H) [APP-157]**.<br><br>2) Regarding the setting of appropriate trigger values, the method detailed in PS(T)134 is based on a three-tier approach. Tiers 1 and 2 are based on predicted absolute noise levels for 'worst case' scenarios at distances either side of a proposed high voltage overhead line. Tiers 1 and 2 are screening tools to identity distances from the overhead lines where predicted absolute noise levels at noise sensitive receivers would be very low, such that, according to the method, a full BS4142-type assessment would be disproportionate and would require far more |

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| | | background surveys to be undertaken along the route identifying no adverse impact at receptors.<br><br>The explanation below is taken from **Appendix 14G National Grid Technical Report TR(E)564 (2021) (Document 5.3.14G) [APP-156]** and is reproduced here to help explain the derivation of the Tier 1 and Tier 2 screening criteria. The criteria used in the Tier 1 and Tier 2 assessment steps are based on the Night Noise Guideline for Europe (NNGE).<br><br>The NNGE suggest an external night-time $L_{Aeq}$ of 40dB as being the Lowest Observable Adverse Effect Level (LOAEL) for residential properties. Given the wealth of evidence on which the NNGE are based, 40dB is taken as the LOAEL for residential properties and the basis on which the National Grid overhead line noise criteria have been developed. Given that these are based on annual averages, the absolute level can be exceeded at some points, under certain conditions, for example in wet weather conditions.<br><br>It is recognised that the evidence on which the NNGE 40dB $L_{Aeq}$ figure was derived relates mainly to traffic noise data. Traffic noise is considered anonymous and therefore less annoying and less noticeable than noise with distinctive character or regarded as having 'ownership', such as that generated by overhead lines. In dry weather overhead lines can crackle and in wet weather they can also hum. It was considered appropriate therefore to set the LOAEL at an even lower level, and the new guidance has incorporated this lower threshold. Most guideline documents recommend lower guideline levels for low frequency noise, but do not offer |

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| | | guidance on how much lower. BS4142:2014 offers clear guidance on character corrections to apply where noise is tonal or has distinguishing features.<br><br>For tonal noise, BS 4142 recommends applying character corrections ranging from 2dB to 6dB depending on how perceptible the tone is, or is predicted to be, at a noise sensitive receptor. As a worst case, a correction of +6dB has been applied to the NNGE of 40dB, giving an acceptable wet noise limit of less than 34dB. This is a worst-case approach because the tonal hum may not be clearly perceptible at the receptor and tonal hum may not be present for the full duration that rainfall occurs.<br><br>BS 4142 recommends a correction of +3dB where the noise is neither tonal, nor intermittent, though otherwise readily distinctive against the residual acoustic environment. Dry noise crackle can be considered to fall into this category and so as a worst case, a correction of +3dB has been applied to the NNGE of 40dB, giving an acceptable dry noise limit of less than 37dB. This is a worst-case approach because dry noise may not be present all the time.<br><br>The NNGE document evidence relating to the levels of noise that cause adverse impacts on health and therefore can equate to being above the LOAEL and in some cases above the SOAEL. The NNGE state that adverse effects on health are observed at noise levels between 40 to 55dB and above 55dB adverse effects occur frequently. Between 40 to 50dB the evidence for adverse health effects is considered sufficient, whilst above 50dB the evidence is limited. Consequently, for |

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| | | the purposes of setting criteria for overhead line noise, adverse impacts on health and quality of life are considered to occur between 40 to 50dB, as sufficient evidence for this exists, and significant adverse impacts are considered to occur above 50dB, as the weight of evidence is limited for levels above 55dB. This is a cautious approach. Applying the penalties described above leads to adverse impacts for wet noise between 34 and 44dB and for dry noise between 37 and 47dB. Significant adverse impacts due to wet noise may occur above 44dB and for dry noise above 47dB.<br><br>Tier 1 is the worst-case screening tool based on the 34dB criterion and the theoretical assumption that wet noise would occur 100% of the time, and hence if an overhead line passes this step it would also pass the Tier 2 and Tier 3 (BS4142:2014) steps. The purpose is to screen out of further assessment receptors where there would be no adverse impact, and to identify receptors where there may be the potential for adverse impact where further assessment is required.<br><br>**275kV XC and SP overhead lines**<br>Where the 275kV XC and XCP overhead lines are to be reconductored (mostly in the Selby District and Harrogate Borough Council areas, with some short sections in the Hambleton District and City of York Council areas), there would not be an adverse impact due to noise and these sections are already scoped out of the ES, as the proposed works were considered to be a like-for-like replacement.<br><br>Where the 275kV overhead lines are to be realigned and rebuilt, and where new sections of the XC and SP 275kV |

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| | | overhead line would be constructed (sections in the Hambleton District and City of York Council areas), these have been screened out at Tier 1. This is because for the nearest noise sensitive receptor to the proposed 275 kV SP overhead line (YOR07 approximately 230m from the centreline), the predicted Tier 1 level is less than 33dB, while for the nearest NSR to the 275kV XP overhead line (HAR03, approximately 130m from the centreline) the predicted wet noise level is 28dB. As both are below the 34dB screening criterion, they are therefore screened out of further assessment.<br><br>It is important to note that the predicted wet noise levels quoted above are for worst-case wet noise conditions and should not be compared to dry weather night-time background sound levels which do not include noise at the receptor due to rainfall. The derivation of a background noise level during rainfall is explained in some more detail below.<br><br>**400kV YN overhead line**<br>In the case of the 400kV overhead line the predicted wet noise levels are above the Tier 1 34dB screening criterion, this identifies the requirement for further assessment of receptors surrounding the 400kV overhead line in the form of a Tier 2 assessment. The Tier 2 assessment takes account of the fact that wet noise occurs only during periods of wet weather and therefore does not occur all the time. The Tier 2 criteria are based on combined absolute wet noise and dry noise effects and recalculated assessment criteria.<br><br>The predicted combined wet/dry criterion is determined through logarithmic calculation, based on the Tier 1 |

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| | | screening criteria of 37dB for dry noise and 34dB for wet noise, factoring in the duration of rainfall which is typically 600 hours per year in the project area. Again, it is important to note this is based on worst case assumptions as neither wet noise nor dry noise would occur all the time.<br><br>The assessment criterion for Tier 2 is calculated to be 36.8dB, which takes into account the percentage of time that wet noise and dry noise may occur.<br><br>The Tier 2 assessment graph for the 400kV YS overhead line is presented in **Figure 14E1.6 of Appendix 14E (Document 5.3.14E) [APP-154]**. This demonstrates that beyond 200m from the centreline the combined wet and dry noise is predicted to be less than 29dB, which is significantly below the Tier 2 36.8dB criterion developed by National Grid, and significantly below the NNGE guideline values.<br><br>**ES Chapter 14 Noise and Vibration (Document 5.2.14) [APP-086]** and **Appendix 14E – Overhead Line Noise Assessment (Document 5.3.14E) [APP-154]** therefore conclude that there would not be an adverse impact due to operational noise from the 400kV and 275kV overhead lines proposed by the Project on any noise sensitive receptor.<br><br>3) The Joint Authorities' Relevant Representation questions a >37dB criterion in the context of background noise due to rainfall at sensitive receptors. As described above, the Tier 1 screening criteria (which applies to worst case wet noise only) is ≥34dB(A) as set out in **Table 3.1 of Appendix 14E – Overhead Line Noise Assessment** |

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| | | **(Document 5.3.14E) [APP-154].** This is a worst-case screening tool which assumes worst-case wet noise occurs 100% of the time. The Tier 2 screening then considers wet noise and dry noise in combination, and a <36.8dB(A) criterion is derived (**Table 3.2 of Appendix 14E – Overhead Line Noise Assessment (Document 5.3.14E) [APP-154]**) which takes into account annual average rainfall hours of 600 hours per year for the project area. It is assumed that it is this criterion (36.8dB rounded to 37dB) that the Relevant Representation refers to as a trigger level for a BS4142 assessment.<br><br>4) The Joint Authorities' Relevant Representation mentions background noise values during rainfall. When a BS4142-type wet noise assessment is required, the dry noise background sound level which would be used in a standard BS4142 assessment is not appropriate because the sound of rainfall influences the background sound level. It is not practicable to measure background sound level at the receiver during rainfall, therefore this has to be derived and is a function of the dry background sound level and the noise level due to rainfall. The appropriate background noise level during rainfall is derived from Miller curves (which are presented in **Appendix B of Appendix 14H - National Grid Technical Guidance Note TGN(E)322 (Document 5.3.14H) [APP-157]**. For the ground terrain in the project area, the appropriate Miller curve would be R2 which equates to noise level due to rain of 41dBA which would then be logarithmically added to the dry background sound level.<br><br>5) Regarding the use of BS4142:2014+A1:2019 for the assessment of overhead line noise, when predicted absolute noise levels suggest there may be an adverse |

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| | | impact then a BS4142 assessment may provide useful context for the assessment. When predicted absolute noise levels are low, as described here, then a BS4142 assessment would not add to the outcome of the assessment. As part of the design process, embedded environmental measures have been adopted to reduce the potential for adverse noise and vibration effects. For the overhead lines these measures include selecting conductor configurations to minimise electrical stress (and hence audible noise), and routing new sections of overhead line away from NSRs, as far as practicable.<br><br>It should further be recognised that the scope of BS4142:2014 +A1 :2019 states that the standard *"describes methods for rating and assessing sound of an industrial and/or commercial nature, which includes:*<br>*a) sound from industrial and manufacturing processes;*<br>*b) sound from fixed installations which comprise mechanical and electrical plant and equipment;*<br>*c) sound from the loading and unloading of goods and materials at industrial and/or commercial premises; and*<br>*d) sound from mobile plant and vehicles that is an intrinsic part of the overall sound emanating from premises or processes, such as that from forklift trucks, or that from train or ship movements on or around an industrial and/or commercial site."*<br><br>Section b) of the scope is relevant for the assessment of substation noise, however, Section 1.3 of BS 4142 states that *"The standard is not intended to be applied to the rating and assessment of sound from...*<br>*h) other sources falling within the scopes of other standards or guidance"* |

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| | | It is therefore considered that the **Appendix 14F National Grid Policy Statement PS(T)134 (2021) (Document 5.3.14F) [APP-155]**, **Appendix 14G National Grid Technical Report TR(E)564 (2021) (Document 5.3.14G) [APP-156]**, **and Appendix 14H National Grid Technical Guidance Note TGN(E)322 (2021) (Document 5.3.14H) [APP-157]** are the most appropriate assessment tools for overhead line noise in this respect and as such retain primacy over BS4142 in such assessment. |
| 18.3 | **Land Contamination**<br>Chapter 10 of the Environmental Statement (and the associated appendices) considers the likely significant effects of Yorkshire GREEN with respect to geology and hydrogeology, including effects relating to land contamination, groundwater levels and groundwater quality. The assessment is based on risk assessments that consider whether the construction, operation or decommissioning of Yorkshire GREEN could disturb areas of old contaminated ground, introduce new soil contamination, cause contamination to enter groundwater, cause gas to move out of the ground that may build up in buildings, or destabilise the ground. A review of published historical mapping indicates that the previous land use within the 500m Study Area has been largely agricultural, together with the quarrying of limestone and small areas of sand and gravel.<br>Baseline conditions were considered on a generalised project-wide basis followed by additional specific detail on three focus areas, where the project is likely to involve greater ground disturbance. Two of these focus areas are in the Selby District – Section D (Tadcaster area) and Section F (Monk Fryston area). SOCOTEC carried out a ground investigation on land to the east and north-west of | National Grid agrees with the summary of the assessment outcomes provided in the Joint Authorities' Relevant Representation.<br><br>The proposed measures for managing unexpected contamination are described in **Table 10.9 of ES Chapter 10 Geology and Hydrogeology (Document 5.2.10) [APP-082]** and measure GH02 of **Appendix 3B Code of Construction Practice (Document 5.3.3B) [APP-095]**. In summary, these documents explain that, in the event that unexpected ground contamination is encountered, work will be temporarily stopped. Materials that are suspected to be affected by contamination will then be subjected to testing and risk assessment to determine the extent, nature and significance of any contamination present. The findings of this risk assessment will then be used to inform remediation or additional protection measures, as/if necessary.<br><br>**Requirement 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** specifies that construction work must be carried out in accordance with the **Code of Construction Practice (Document 5.3.3B) [APP-095]**, securing the process described above. |

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| | the existing Monk Fryston substation. Soil and water samples were taken and analysed. The contamination testing results record concentrations of VOC, free cyanide, speciated phenols, PCBs and BTEX to be below laboratory detection limits in the soils tested. Asbestos was not recorded in any of the seven samples. Concentrations of PAHs, speciated TPH and metals were all found to be low. Concentrations of leachable contaminants were generally recorded to be less than UK Drinking Water Standards and Environmental Quality Standards.<br><br>Embedded measures would prevent significant exposure to contaminants, minimise risk of mobilising pre-existing contamination, prevent new releases of contamination occurring, and protect substations/buildings from ground gas. These embedded measures include complying with relevant health and safety legislation and best practice construction requirements, carrying out ground investigations prior to construction (where necessary), and having contingency procedures for any unexpected contamination encountered during construction.<br><br>Based on the proposed locations of substations, CSECs and pylons and routeing of the new and modified overhead lines, plus the incorporation of appropriate embedded environmental measures, no significant effects have been identified in relation to geology and hydrogeology from construction, operation and maintenance, and decommissioning of Yorkshire GREEN.<br><br>Significant contamination is not expected to be present at the site and no significant effects have been identified in relation to geology and hydrogeology from construction, operation and maintenance, and decommissioning of Yorkshire GREEN. The proposed embedded measures are considered to be acceptable and proportionate, | **Requirement 12 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** specifies that development shall not proceed in any areas affected by unexpected contamination that presents a significant risk to health or the environment (including Controlled Waters) until a written scheme of mitigation or remedial measures is submitted to, and approved by, the Local Planning Authority. Requirement 12 also specifies that the implementation and validation of the measures described in the written scheme must subsequently be documented in a verification report submitted to the Local Planning Authority.<br><br>It is considered that the measures described above, and secured through Requirements 5 and 12, generally cover what is requested in the Condition that is recommended in the Joint Authorities' Relevant Representation. A slight variance is noted in that, following the process in the **Draft Development Consent Order (Document 3.1(B)) [AS-011]** and the **Code of Construction Practice (Document 5.3.3B) [APP-095],** the Local Planning Authority may not be informed of unexpected contamination until it has been tested and risk assessed, whereas the recommended Condition in the Relevant Representation states that the notification must be immediate upon encountering unexpected contamination. The approach in the Draft DCO has the benefit that the Local Planning Authority is not informed of 'false alarms' before the unexpected material has been tested and risk assessed and is therefore considered appropriate. This eases the administrative burden on the Local Planning Authority and is National Grid's preferred approach. |

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| | based on the sensitivity of the proposed development and the potential for the previous land uses to have given rise to contamination issues. The embedded measures should prevent significant exposure to contaminants, minimise risk of mobilising pre-existing contamination, prevent new releases of contamination occurring, and protect substations/buildings from ground gas.<br>The recommendation us made that the following planning condition/requirement is attached to any planning approval, in case unexpected contamination is detected during the development works:<br>*Condition 1: Reporting of Unexpected Contamination: In the event that unexpected land contamination is found at any time when carrying out the approved development, it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken and, if remediation is necessary, a remediation strategy must be prepared, which is subject to approval in writing by the Local Planning Authority. Following completion of measures identified in the approved remediation strategy, a verification report must be submitted to and approved by the Local Planning Authority. It is strongly recommended that all reports are prepared by a suitably qualified and competent person.*<br>*Reason: To ensure that the site is suitable for its proposed use taking account of ground conditions and any risks arising from land contamination.* | |
| 18.4 | **Heritage**<br>The Environmental Statement includes a Chapter on the Historic Environment (Chapter 7). This chapter is supported by an archaeological desk-based assessment (Appendix 7A) and the results of archaeological geophysical surveys at Overton (Appendix 7B), Monk Fryston (Appendix 7C) and Tadcaster (Appendix 7D). | National Grid notes the Joint Authorities conclusion that **ES Chapter 7 Historic Environment (Document 5.2.7) [APP-079]** and associated Appendices provide an adequate assessment of heritage assets of archaeological interest and welcomes continued engagement with the Joint Authorities regarding the detailed aspects of mitigation of the impacts on heritage assets. A Written Scheme of Investigation (WSI) has |

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| | The sites at Overton and Monk Fryston were further evaluated by trial trenching (Appendix 7E). Together, these documents represent an adequate assessment of the proposal on heritage assets of archaeological interest. For the majority of the route the archaeology is either well understood or the scale of the proposal is limited meaning that significant impacts are not expected. I agree that in these case mitigation by an agreed scheme of archaeological works is an appropriate way forward. Whilst it would have been desirable to carry out trial trenching at Tadcaster the types of remains expected (i.e. a section of Roman Road and several field enclosures) are unlikely to represent a barrier to development providing appropriate mitigation in put in place. This is highlighted in section 7.46.6 of the Historic Environment Chapter. As well as including archaeological recording this mitigation could also include limiting the physical impact of the proposal if significant deposits are found to be present. This might take the form of micro-siting or using less invasive construction techniques for aspects of the scheme such as site compounds or access tracks. We would welcome an opportunity to continue to work with the Applicant on detailed aspects of mitigation of the impacts on heritage assets, to ensure an appropriate response in keeping with minimising the impact on the significance of the heritage assets. | been produced to address mitigation measures, and provide a robust basis for further mitigation work. Adherence to this WSI is secured through **Requirement 5(2)(b) of the draft Development Consent Order (Document 3.1(B)) [AS-011]**. The WSI can be found at **Appendix 3C Archaeological Written Scheme of Investigation (Document 5.3.3C) [APP-096]**. |
| 18.5 | **Ecology and Biodiversity**<br>The DCO application includes an ecological impact assessment contained within the Environment Statement. It is noted that some survey and assessment remains incomplete – specifically for bats and hedgerows. Notwithstanding the incomplete assessments, the Authority is satisfied that survey and assessment has been undertaken in accordance with current standards. | National Grid notes the Joint Authority's statement that (notwithstanding ongoing bat and hedgerow surveys) it is satisfied with the survey and assessment undertaken to inform the conclusions of the **ES Chapter 8 Biodiversity (Document 5.2.8) [APP-080]**.<br><br>As explained in **paragraph 8.1.14 of the ES Chapter 8 Biodiversity (Document 5.2.8) [APP-080]**, bat survey work (for potential tree roosting habitat) is currently ongoing as |

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| | The Authority welcomes the applicant's commitment to providing 10% biodiversity net gain.<br>Detailed comments cannot be provided at this stage in relation to mitigation and enhancement measures, further comments will be provided within the Local Impact Report. | additional trees which require management were identified in **Appendix 3I Arboricultural Impact Assessment (Document 5.3.3I) [APP-102 to APP-104]** after completion of baseline surveys to inform the Environmental Assessment.<br><br>As summarised in **Table 8.8 of the ES Chapter 8 Biodiversity (Document 5.2.8) [APP-080]** and further detailed in **Section 2.3 of Appendix 8H Bat Survey Report (Document 5.3.8H) [APP-133]**, the assessment of potential for effects on bats within the Environmental Statement has been based on a comprehensive suite of bat activity survey work across the Order Limits during 2021 and 2022 comprising four walked transect routes and 14 static monitoring locations, in addition to tree roost assessments of over 150 trees. In view of the approach taken to the assessment (based on the reasonable worst-case) and embedded environmental measures of relevance to bats incorporated into the Project, the results of ongoing tree surveys are not expected to affect the outcome of the assessment for bats which concluded in **paragraph 8.9.107 of the ES Chapter 8 Biodiversity (Document 5.2.8) [APP-080]** that the magnitude of change on bats due to the Project would be very low resulting in no significant effects. Embedded environmental measures of relevance to bats are listed on **pages 61 to 62 in Appendix 3A Embedded Measures Schedule (Document 5.3.3A) [APP-094]** and would be delivered via the implementation of the Biodiversity Mitigation Strategy in **Appendix 3D Biodiversity Mitigation Strategy (Document 5.3.3D) [APP-097]** secured by **Requirement 5(2)(c) of the draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br>National Grid has received confirmation from Natural England that it is satisfied with the approach to the assessment of potential effects on bats including the ongoing surveys (Natural England's Relevant Representation **RR-031**) with this matter |

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| | | being rated by Natural England as 'green' i.e. those issues which have been successfully resolved (subject always to the appropriate requirements being adequately secured) OR where there are no issues or impact pathways.<br><br>As explained in **paragraphs 8.1.15-8.1.16 of the ES Chapter 8 Biodiversity (Document 5.2.8) [APP-080]**, detailed hedgerow assessments to confirm the presence of 'important' hedgerows as defined under the Hedgerow Regulations are ongoing. For the purpose of the assessment, all hedgerows are assumed to qualify as Habitats of Principal Importance (HPI) regardless of 'important' status, and those hedgerows identified from preliminary assessment as 'potentially important' with respect to biodiversity criteria were assumed to qualify as 'important'. Therefore, the assessment has been conducted in line with a reasonable worst-case approach. In view of this and the embedded environmental measures of relevance to hedgerows incorporated into the Project, the results of the ongoing surveys are not expected to affect the outcome of the assessment which concluded in **paragraph 8.9.47 of the ES Chapter 8 Biodiversity (Document 5.2.8) [APP-080]** that the magnitude of change on hedgerows due to the Project would be low resulting in no significant effects. Embedded environmental measures of relevance to hedgerows are listed on **page 61 in Appendix 3A Embedded Measures Schedule (Document 5.3.3A) [APP-094]** and would be delivered via the implementation of the Biodiversity Mitigation Strategy as submitted in **Appendix 3D Biodiversity Mitigation Strategy (Document 5.3.3D) [APP-097]** secured by **Requirement 5(2)(c) of the draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br>The results of the ongoing bat and hedgerow surveys will be submitted as an addendum to the Environmental Statement following completion of surveys in April (which allows for the |

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| | | optimal survey period for hedgerow surveys and is the likely completion date for bat surveys, subject to access). The Report submission is likely to be in April/May 2023.<br><br>The Joint Authority's satisfaction with National Grid's commitment to deliver 10% net gain is noted.<br><br>National Grid also notes that it has not been possible for the Joint Authorities to provide detailed comment, at this stage, on the proposed mitigation and enhancement measures for the Project. National Grid will respond to the Joint Authorities' detailed comments when these are made available in the Local Impact Report and will continue to engage with the Joint Authorities on these matters through the Statement of Common Ground (SoCG) process. |
| 18.6 | **Landscape**<br>The Authority is satisfied that the DCO Application includes an adequate Landscape and Visual Impact Assessment (LVIA) subject to further information as to how the applicant intends to address the mitigation of adverse effects on landscape receptors and visual receptors (judged as either Significant or Not Significant).<br>The Outline Landscape Mitigation Strategy and Proposed Planting Areas (Table 6.16) in Document 5.2.6 ES focuses mitigation at the Overton Substation, Monk Fryston Substation and Tadcaster CSEC (see more detailed comments below) and it appears that no mitigation is proposed outside these areas. We would draw the applicant to Overarching National Policy Statement for Energy (EN-1) section 5.9 Landscape and Visual, including Landscape impact (paragraph 5.9.8) providing reasonable mitigation where possible and appropriate and section 5.10 Land use including open | The Joint Authorities refer to paragraphs 5.9.8, and 5.10.19 to 5.10.24 of NPS EN-1.<br><br>Paragraph 5.9.8 describes how projects need to be carefully designed to minimise harm to the landscape and provide reasonable mitigation where possible and appropriate. **Section 6.5 of the Design and Access Statement (Document 7.2) [APP-203]** explains how the Project accords with National Grid's guidance on the routeing and siting of Infrastructure and the Holford Rules to avoid areas of the highest amenity value. Outline Landscape Mitigation has been proposed near the Substations and CSECs in **Figures 3.10 to 3.12 of ES Chapter 3 Description of the Project Figures (Document 5.4.3) [APP-164]**.<br><br>A detailed scheme for mitigation planting is secured under **Requirement 8(1)(a) of the draft Development Consent** |

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| | space, green infrastructure & Green Belt, particularly Mitigation (paragraphs 5.10.19-5.10.24). The Outline Landscape Mitigation Strategy has been developed (see Figures 3.10 to 3.12 in Chapter 3: Description of the Project, Volume 5, Document 5.4.3) and forms part of the Project at both proposed substation sites and the Tadcaster CSECs. This comprises locations of earth mounding and new planting, comprising hedgerow reinforcement with new planting as well as new hedgerow, tree and woodland planting. We would welcome an opportunity to continue to work with the Applicant on detailed aspects of the landscape and visual mitigation, to ensure an appropriate response in keeping with local landscape character. The Authority would also wish to see further information and clarification for long-term maintenance and management of proposed landscape mitigation including responsibilities and how landscape is secured as a permanent element of the scheme through the Development Consent Order. | **Order (Document 3.1(B)) [AS-011]** in addition to a detailed landscape strategy around the substations and CSECs that is secured under **Requirement 8(1)(b)**. Together, **Requirement 8(1)(a) and 8(1)(b)** cover the full extent of the Project to accord with the arboricultural impact assessment, the details of which are secured under **Requirement 10**. As set out in **paragraphs 3.6.59-3.6.61 of ES Chapter 3 Description of the Project (Document 5.2.3) [APP-075]**, the reinstatement strategy describes how trees and hedgerows would typically be reinstated in original locations and where this would not be possible e.g., within a pylon footprint or due to the clearance to conductors (wires), then planting would be provided at a suitable location as close as possible to the original location.<br><br>Paragraphs 5.10.19 refers to good design principles. The **Design and Access Statement (Document 7.2) [APP-203]** explains how National Grid has applied an iterative design process to achieve good design principles on the Project.<br><br>Paragraphs 5.10.20 and 5.10.21 of EN-1 relate to green infrastructure. Green Infrastructure is defined in EN-1 as *"a network of multi-functional green spaces, both new and existing, both rural and urban, which supports the natural and ecological processes and is integral to the health and quality of life of sustainable communities*". The **Biodiversity Mitigation Strategy (Document 5.3.3D) [APP-097]** sets out the environmental measures that will ensure the Project avoids, reduces and compensates for negative effects, to ensure compliance with legislation and best practice in respect of biodiversity. In addition, as noted in the Ecology section above, National Grid is committed to deliver 10% biodiversity net gain.<br><br>Paragraph 5.10.22 and 5.10.23 of EN-1 refer to mineral safeguarding. The **Minerals Resource Assessment** |

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| | | **(Document 7.10) [APP-211]** confirms that minerals present within the Order Limits have already been sterilised by existing infrastructure and therefore the minerals have no potential value or economic value.<br><br>Paragraph 5.10.24 of EN-1 refers to mitigation measures to address adverse effects on National Trails and other rights of way. This is covered in more detail below.<br><br>It is noted that the LVIA is considered adequate by the Joint Authorities subject to further information as to how National Grid intends to address the mitigation of adverse effects. As explained above, landscape mitigation is proposed for the entire scheme and is secured under **Requirement 8 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br><u>Mitigation of significant effects</u><br>The Outline Landscape Mitigation Strategy **Figures 3.10 to 3.12 of ES Chapter 3 Description of the Project Figures (Document 5.4.3) [APP-164]** sets out the mitigation proposed for the areas of the Project where the LVIA has identified Significant landscape and/or visual effects that have the potential to be mitigated by planting and/or earth mounding i.e. close to the substations and CSECs.<br><br>In relation to Overton Substation, Monk Fryston Substation and the Tadcaster CSEC, the Outline Landscape Mitigation Strategy also describes at **Table 6.8 in ES Chapter 6 Landscape and Visual** (**Document 5.2.6) [APP 078]** how the Project layout has been optimised, through embedded mitigation, to maximise the use of existing access points and to minimise the loss of hedgerows and trees where new access is unavoidable and where clearance is required for substations |

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| | | and CSECs. The requirements of the detailed landscape design based on the Outline Landscape Mitigation Strategy, including a management plan and a 5-year maintenance regime with monitoring and management are secured under **Requirements 8 and 9 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**. The Shipton CSEC is not an area identified for additional mitigation planting over and above reinstatement planting. The growth of reinstatement hedgerow planting along Newlands Lane would be effective in limiting the majority of views of the Shipton CSEC from the closest receptors (walkers on the ORPA along Newlands Lane) but would not screen the additional pylons as demonstrated by comparing Viewpoint 9 photomontages at Year 1 and Year 15 in **Figures 6.39b and 6.39c of (Part 5 of 15) ES Chapter 6 Landscape and Visual Figures (Document 5.4.6) [APP-171]**. The rationale for not including additional tree planting within the hedgerow is that it would not be possible to eliminate localised significant effects from Newlands Lane as sections of the route lie within the easement of the overhead lines and consequently oblique views of the new taller pylons would be unavoidable. The full context is set out at **Table 6G.32 of Appendix 6G Visual Receptor Assessment (Document 5.3.6G) [APP-114]** where it is stated that: *"Given the close proximity of the existing 400kV Norton to Osbaldwick (2TW/YR) overhead line to the ORPA and the isolated location of the ORPA (that is not well connected to the wider PRoW network), no specific landscape measures are proposed to address the visibility of the new structures associated with the Project CSECs".*<br><br>The ES acknowledges at **paragraph 6.14.3 of ES Chapter 6 Landscape and Visual** (**Document 5.2.6) [APP-078]** that a small number of long-term significant adverse effects cannot be fully mitigated where road users or recreational route users pass under or very close to the 400kV YN or 275kV XC overhead lines in the North West of York Study Area. The |

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| | | receptors where long term significant adverse effects would be experienced are users on localised sections of the PRoWs east of Shipton by Beningbrough, the ORPA to Newlands Farm, a section of the NCR 65 and Way of the Roses long distance cycleway and footpath along Overton Road and Station Lane, and sections of Corban Lane and the A19. In these locations it would not be possible to fully mitigate effects with tree planting due to the height of the pylons and the proximity of the receptors to the new infrastructure, noting that new tree planting is not possible within the easement of the new overhead lines.<br><br>**Paragraphs 6.14.5-6.14.7 of ES Chapter 6 Landscape and Visual** (**Document 5.2.6) [APP-078]** identifies the six small clusters of scattered dwellings where there would be long term significant adverse effects (i.e., Hall Moor Farm Cottages, Hall Moor Farm (South), Overton Grange and Glenroyd Cottages; New Farm Cottages; dwellings on Stripe Lane and Pollums House Farm). The potential for mitigation planting to eliminate long term significant visual effects has been considered at all of these dwellings, following review in the field. It has been concluded that mitigation proposals to reduce or prevent views of new infrastructure could also have negative effects that, depending on the use of the land adjoining the dwelling and opinions of the resident/landowner, could outweigh any benefits. In all cases, it is assessed that an appropriate separation distance has been maintained between the proposed pylons and property curtilage to avoid any overbearing effects on residential visual amenity.<br><br><u>Mitigation of Not Significant Effects</u><br>The mitigation to address the Significant adverse effects of the Project outlined above would also minimise Not Significant adverse effects associated with the Substations and CSECs. However, the Not Significant adverse landscape and visual |

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| | | effects arising from the Project primarily relate to the proposed new pylons or taller replacement pylons, located in a typically open rural landscape. Consequently, the landscape mitigation within the Order Limits, whilst reducing the adverse impact of the substation and CSEC infrastructure, could not notably reduce localised Not Significant adverse effects arising from the new pylons. In this context landscape mitigation that would need to be beyond the Order Limits cannot be reasonably expected to eliminate or substantially reduce non-significant adverse effects identified in the ES.<br><br>In addition to Non-Significant effects covered in the ES, it was agreed as part of the scoping with the Planning Inspectorate (PINS) in **Appendix 6A EIA Scoping Opinion Responses on Landscape and Visual Assessment (Document 5.3.6A) [APP-108]** under PINS ID PINSC4-6 4.1.3 that in relation to landscape elements at construction:<br>*"The Inspectorate considers that whilst there is likely to be some impact on the identified landscape elements during construction of the Proposed Development, on the basis of the information presented in the Scoping Report this will not result in impact to nationally designated landscape areas and/or the permanent loss or change of landscape elements of importance. Therefore, the Inspectorate agrees that this matter can be scoped out of the ES."*<br><br>As set out at **paragraph 6.17 of Chapter 6 Landscape and Visual** (**Document 5.2.6) [APP-078]** further details of the reinstatement and maintenance of tree and hedgerow planting within the Order Limits, as illustrated on the **Trees and Hedgerows Potentially Affected Plans Sections A-F (Document 2.11.1-2.11.6) [APP-050-APP-055]** would be covered by **Requirements 8 and 9 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**. |

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| | | A detailed landscape strategy secured under **Requirements 8 and 9** would be developed, post-consent, to reflect the fact that the detailed engineering design will refine and likely reduce the extent of trees and hedgerows to be removed or managed. The detailed landscape strategy for the whole Project would be based on the THPS secured under **Requirement 10** of the dDCO. The detailed landscape strategy would include the reconductoring sections, where the reinstatement strategy would replace any trees and hedgerows lost within the Order Limits, in addition to the tree and hedgerow planting already proposed as part of the Outline Landscape Mitigation Strategy around the substations and CSEC. |
| 18.7 | **Local Highways Authority**<br>The L.H.A has been consulted on this project by National Grid. The project will upgrade the electrical infrastructure within the North Yorkshire area and improve power generation for the nation. The project is to upgrade the existing cables and replace some pylons along the identified corridor. The route approximately follows a north south path from Overton near York to Monk Fryston and includes Tadcaster. National Grid as part of the work plan to install a new substation at Overton and Monk Fryston and construct a cable sealing and connecting compound near Tadcaster next to the A64.Numerous access points will be required along the works corridor. The developer has outlined within the application how the project will impact on the local highway network. The project has two elements of impact on the highway network.<br>The first is accessing the various locations along the route and how the developer plans to manage this. The view of the Authority is generally the work near to or | <u>Traffic Management and Construction Traffic Access Points</u><br>National Grid acknowledges that the Local Highway Authority (LHA) are of the view that work near to or within the highway can generally be managed and wishes to provide assurances that it is the intention to agree safe working practises with the LHA to protect the interests of the general public. **Appendix 3F Construction Traffic Management Plan (Document 5.3.3F) [APP-099]** has been prepared which, in **Section 7**, details the traffic management measures to be implemented across the project to ensure safe and convenient working practices. **Paragraph 7.2.1 of Appendix 3F Construction Traffic Management Plan (Document 5.3.3F) [APP-099]** proposes that no road closures will be required in order to facilitate construction traffic management. It currently proposes that scaffolding and protected crossings of highway infrastructure will be adopted at most locations where the project is required to cross roads within the County. It is anticipated that this would typically require a short rolling road block during installation and a Traffic Regulation Order has been sought in the **draft Development Consent Order (Document 3.1(B)) [AS-011]** |

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| | within the highway can be managed but concerned that safe working practises are introduced to protect the travelling public and the developer will support the authority in this approach. This may mean roads might need to be closed and diversions routes provided. Noted that the developer wishes to bridge over roads when implementing any cabling works.<br><br>The second element of the work has identified a two Sub stations that need to be constructed and a large cabling compound. it is expected this work will impact on the road network. The Overton site is likely to require alterations to the highway including local widening and a permanent access point. The site is very close to the A19 and therefore the L.H.A understands all construction vehicles will approach the site from this road once Overton Lane has been improved. It is expected some large items delivered to site will be classed as abnormal loads which may present the developer with routing difficulties and discussion with the L.H.A will be required. It is worth noting that any abnormal load when heading south on the A19 may risk grounding at Thormanby due to the vertical alignment of the road. The L.H.A also wishes to advise that other site locations near Shipton may require further investigation with junction widening expected on East Lane and Corban Lane. Corban Lane at present has a 7.5tonnes weight limit. The new Monk Fryston sub station is to be constructed near to the existing substation. The site has direct access from the A1(m) and A63. Local widening of Rawcliffe Lane and its junction with the A63 will be required. Management of delivery's to site may need to be outside peak times to reduce conflict at the junction onto Rawcliffe Lane. The other large compound is near Tadcaster on the A64. Access to this facility will be gained from the minor road network and not the A64. | accordingly (see TR45 to TR46). A stop/go board system may also be required at the road crossing with Stripe Lane which is located near the settlement of Skelton. The mitigation strategies will be discussed further with the LHA to inform consideration of detailed traffic management and implementation/scheduling of measures around other ongoing highway works (see **paragraphs 7.1.2, 7.2.4 and 7.2.5 of Appendix 3F Construction Traffic Management Plan (Document 5.3.3F) [APP-099]**). If road closures and diversion routes are considered necessary by the LHA, then National Grid will work collaboratively to ensure that appropriate measures are executed. **The Construction Traffic Management Plan (Document 5.3.3F) [APP-099]** is secured though **Requirement 5(2)(d) of the draft Development Consent Order (Document 3.1(B)) [AS-011]**. In addition, **Requirement 14 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** details that no work to construct or temporarily alter any new or existing means of access to a highway to be used by vehicular traffic may commence until written details of the design and layout of that means of access has been submitted to and approved by the relevant LHA.<br><br><u>Access to Substations and Compounds</u><br><br>Two substations and Cable Sealing End Compounds are proposed under the DCO application. The new substation at Overton will require a permanent point of access to be constructed, which will need to achieve a boundary connection with the local road network. It is acknowledged that the LHA is of the opinion that the proposals may also require an element of alteration to the public highway to provide local widening at certain points along the A19 corridor. Proposed widening (of the junction of the A19 and along Overton Road, which are within the Order limits) is detailed in **Annex 3F.1.B of Appendix 3F Construction Traffic Management Plan (Document 5.3.3F) [APP-099]**. |

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| | Therefore, engagement with the L.H.A will be necessary as the application goes forward.<br>In building the various access points and establishing the site compounds along the route the management of each site must involve discussions with the L.H.A possibly needing to establish an approach in the draft D.C.O. at each location. Traffic generated by the operations per day may be of the order of 20 to 30 vehicles at any given location. Each activity may be independent of another so the impact on the highway network may be felt right across all areas. Therefore the Authority sees the importance of further discussions with the developer to formulate the production of the construction management plan and construction travel plan as well as the Development Consent Order ( DCO). The L.H.A notes that the project will be implemented over a number of stages which may assist with controlling traffic on the network and the L.H.A would expect to see any phasing programme within the construction management plan as the project progresses. It is expected in all cases that heavy goods vehicles will avoid settlements as much as possible and roads will only be closed to ensure road safety.<br>The application has included some design details illustrating how the developer will access each location showing roads either within the site or accesses onto the highway network. The L.H.A has its own design standards and the one's presented do not necessary follow what the authority wishes to see installed either as a temporary measure or as a permanent solution. The authority does not wish to see loose material on or near the highway or debris of any kind. The construction will run from 2024 and continue until 2028 when the temporary access points will be removed. Once removed | Construction vehicles are currently expected to arrive at the site using the A19 corridor, however, it is proposed that any abnormal loads will be routed via the A64 and A1237 York Outer Ring Road, before approaching site on the A19 from the east and onto Overton Road. An Abnormal Indivisible Load (AIL) assessment of the AIL delivery routes is presented in **Annex 3F.1 of Appendix 3F Construction Traffic Management Plan (Document 5.3.3F) [APP-099]** which includes mitigation measures at pinch points. National Grid is supportive of engagement with the Local Highway Authority to agree details of the routing strategy and acknowledges that the vertical alignment of the A19 at Thormanby would be potentially unsuitable for wide or abnormal loads.<br><br>National Grid acknowledges the LHA comments in relation to the potential need for widening works on East Lane, however, this is unnecessary as **Appendix 3F Construction Traffic Management Plan (Document 5.3.3F) [APP-099]** requires that no HGVs use East Lane (with all trips originating from the B1363 and Corban Lane instead). In relation to Corban Lane, **ES Chapter 12 Traffic and Transport (Document 5.2.12) [APP-084]** acknowledges the presence of a 7.5 tonne weight restriction (although it must be noted that this excludes loading). Additionally, **Appendix 3F Construction Traffic Management Plan (Document 5.3.3F) [APP-099]** presents Swept Path Analysis for the B1363/Corban Lane junction in relation to the proposed Abnormal Indivisible Load (AIL) cable drum routing and did not identify a requirement for junction widening. **Paragraph 3.6.4 of Appendix 3F Construction Traffic Management Plan** (**Document 5.3.3F) [APP-099]** states that a full road condition survey will be undertaken for AIL routes before and after delivery to ensure the highway remains in a suitable condition. |

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| | the L.H.A expects the point of access to be returned to grass verge or landscape as necessary. | National Grid acknowledges the LHA comments in relation to the potential need for widening works on Rawcliffe Lane and the intersection with the A63. Again, **Appendix 3F Construction Traffic Management Plan (Document 5.3.3F) [APP-099]** presents Swept Path Analysis for the A63/Rawcliffe Lane junction in relation to the proposed Abnormal Indivisible Load (AIL) cable drum routing and did not identify a requirement for junction widening.<br><br>National Grid welcomes the opportunity for continued proactive engagement with the LHA over future access to the proposed compound adjacent to Tadcaster. Similarly, full engagement will be undertaken to confirm Local Highway Authority requirements with regards access solutions to the various site compounds along the route. Proposals for the CSEC Tadcaster access are detailed in **Annex 3F.A.4 of Appendix 3F Construction Traffic Management Plan (Document 5.3.3F) [APP- 099]** and Highway Works **Requirement 14 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** details that no vehicular access construction can commence until the access layout and design has been submitted to and approved by the Local Highway Authority.<br><br><u>Construction Traffic Management Plan and Construction Travel Plan</u><br>National Grid notes the JLHA request for further engagement on the preparation of a detailed Construction Management Plan and Construction Travel Plan. However, the detailed Construction Traffic Management Plan has been submitted as part of the DCO application as **Appendix 3F Construction Traffic Management Plan (Document 5.3.3F) [APP-099]**. For the avoidance of doubt, this is considered to be a full plan (and not an outline plan) which, therefore, does not require any further approval. However, within which it is noted that there will be further engagement with the Local Highway Authority with |

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| | | regards mitigation strategies concerning construction traffic and detailed traffic management proposals, as stated in **paragraphs 7.1.2, 7.2.4 and 7.2.5 of Appendix 3F Construction Traffic Management Plan (Document 5.3.3F) [APP-099]**. **Appendix 3G Public Rights of Way Management Plan (Document 5.3.3G) [APP-100]** also highlights that engagement with Public Right of Way (PRoW) officers, relating to relevant location and forms of management measures for specific routes, is to take place, as stated in **paragraphs 3.1.4, 3.1.10 and 3.4.1**. The Public Rights of Way Management Plan is secured by **Requirement 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br>Appropriate details of phasing are therefore provided in these finalised documents covering all stages. Furthermore, **Requirement 4 of the draft Development Consent Order (DCO) (Document 3.1(B)) [AS-011]** necessitates that a written scheme setting out the stages of the authorised development be submitted to the relevant planning authority,<br><br>A Construction Travel Plan is not considered necessary as the rural location of the Project means there will be a dependence on vehicular transport for construction staff. Furthermore, the construction sites are dispersed and there needs to be flexibility to allow inter-site travel. **Appendix 3F Construction Traffic Management Plan (Document 5.3.3F) [APP-099]** provides the opportunity to encourage contractors to demonstrate how they will get staff to site in multi-occupancy vehicles where feasible. This can be managed and implemented by the Transport Coordination Officer.<br><br><u>HGV Routing</u><br>An HGV routing strategy for construction is provided in **Appendix 3F Construction Traffic Management Plan** |

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| | | **(Document 5.3.3F) [APP-099]**. Where possible to do so, the detailed strategy took into account the avoidance of residential settlements, along with a variety of other considerations including height/weight restrictions, vulnerable road users, gradients, congestion, visibility and the presence of traffic calming. It also outlines that information will be given to HGV drivers regarding the construction routes to be used, confirming that there are no proposed road closures and that mitigation strategies will be discussed with the Local Highway Authority in relation to this detailed traffic management and any required updates to it ,as specified in **Section 8 of Appendix 3F Construction Traffic Management Plan (Document 5.3.3F) [APP-099]**.<br><br>Construction Accesses<br>National Grid acknowledges the LHA requirement that any future access points are developed in accordance with the North Yorkshire County Council Design Guide and confirms that this process will be respected as the application progresses. Technical engagement, relating to access designs, has been undertaken with North Yorkshire Council relating to accesses complying to Design Manual for Roads and Bridges (DMRB) standards, as summarised in **Table 12.5 of the ES Chapter 12 Traffic and Transport (Document 5.2.12) [APP-084]**. As discussed previously, National Grid welcomes to opportunity for continued proactive engagement with the LHA over future access considerations. As set out previously, **Requirement 14 of the draft Development Consent Order (Document 3.1(B) [AS-011]** details that no vehicular access construction can commence until the access layout and design has been submitted to and approved by the local highway authority.<br><br>Loose Material/debris on the Public Highway |

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| | | In relation to the point raised on loose material/debris on the public highway, **paragraph 7.3.9 of Appendix 3F Construction Traffic Management Plan (Document 5.3.3F) [APP-099]** includes proposed measures, where required, to prevent the site debris being transferred onto the highways network during the construction period. This includes provisions for wheel washing, rumble strips and appropriate road sweeping along the public highway during all phases of construction (following which, any temporary accesses will be removed and the adjacent highway returned to grass verge to the satisfaction of the Council). |
| 18.8 | **Green Belt**<br>The key issue for the Examining Authority in considering this scheme is;<br>• Firstly, whether the development is appropriate or inappropriate development in the Green Belt.<br>• Secondly whether the development would preserve the openness of the Green Belt and<br>• Thirdly, If inappropriate whether Very special Circumstances exist sufficient to outweigh the definitional harm by reason of inappropriateness, the harm to the openness of the Green Belt and any other harm resulting from the development.<br>Parts of the proposed development are engineering operations other parts are structures. Para 149 of the NPPF applies to structures/buildings. Para 150 of the NPPF applies to engineering operations. The NPPF sets out at para 149 that the construction of new buildings is inappropriate unless it falls within the limited list of exceptions set out at para 149 a) to g). Some elements of the scheme (eg. the pylons, overhead lines, any buildings, enclosures, boundary fencing or operational equipment) are structures and don't fall within any of | Paragraph 5.10.17 of the Overarching National Policy Statement (NPS) for Energy EN-1, sets out that *"energy infrastructure projects are likely to comprise 'inappropriate development'".* As a result, very special circumstances will therefore be required to "*justify inappropriate development"*. Paragraph 5.10.17 goes on to state that the Secretary of State will attach substantial weight to the harm to the Green Belt when considering any application for such development *"while taking account, in relation to renewable and linear infrastructure, of the extent to which its physical characteristics are such that it has limited or no impact on the fundamental purposes of Green Belt designation".*<br><br>National Grid has carefully considered the effects of the Project on the Green Belt. This is set out in detail in pa**ragraphs 7.3.59-7.3.105 and 7.4.7-7.14.7 of the Planning Statement (Document 7.1) [APP-202]**.<br><br>National Grid considers that all of the works (both temporary and permanent) required for the Project (including pylons, overhead lines, reconductoring, CSECs and substations) are "engineering operations". National Grid's assessment is also |

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| | these limited categories in para 149. Therefore, they are inappropriate development which is harmful by definition and Very Special Circumstances (VSC) will be needed to clearly outweigh the harm by definition and any other harm identified.<br><br>Other elements of the scheme such as underground cabling, ground works, engineering works etc are engineering operations. The NPPF at para 150 sets out that other forms of development (which includes engineering operations) are not inappropriate where they 1) preserve the openness and 2) don't conflict with the purposes of the including land in the GB. Where they fail 1 or 2 above, they are inappropriate development by definition and VSC are required to clearly outweigh the harm by definition and any other harms resulting from the proposal. In terms of the purposes of Green Belts, it is considered that the proposal would not be consistent with Purpose c) set out under para 138 of the NPPF which is "to assist in safeguarding the countryside from encroachment". As such it would conflict with the purposes of including land within the Green Belt.<br><br>Some of the engineering operation elements of the scheme are appropriate development due to limited visual and spatial impact. Other engineering elements will have an impact on the openness. Overall the scheme will result in a number of 'structures' and operational equipment which will have a significant impact on the openness of the Green Belt due to the increased size of the substation at Monk Fryston, the scale of the development, the presence of additional pylons, overhead lines, operational equipment and infrastructure at this location and across the projects location.<br><br>Substantial weight should be given to any harm to the Green Belt. VSC will not exist unless the harm by reason of inappropriateness and any other harms to the Green | that the pylons, overhead lines and reconductoring elements of the works preserve the openness of the Green Belt and do not conflict with the purposes of including land within it, in line with paragraph 150 of the NPPF as described by the Joint Authorities.<br><br>The reasons why the pylons and overhead lines are not considered to affect openness are set out in **paragraphs 7.3.73 and 7.3.74 of the Planning Statement (Document 7.1) [APP-202]**. This explains that although overhead lines may occupy long corridors within Green Belt, they involve little physical change to the land through which they pass and leave a large majority of the land beneath them free from development and therefore open. As the pylons are of a lattice design (and therefore transparent) and spaced up to approximately 360m apart, the perception of openness is maintained as one is able to 'see through' the widely spaced pylons and conductors to whatever is beyond. The reconductoring works to upgrade the existing XC 275kV overhead line would not have greater effects on the Green Belt than the current infrastructure existing within the Green Belt. However, in the event that the Examining Authority or Secretary of State disagree with this view, National Grid consider that the need for the Project amounts to very special circumstances which outweighs any harm to the Green Belt as well as any other harm. These very special circumstances are set out below and in **paragraph 7.3.98 of the Planning Statement (Document 7.1) [APP-202]**.<br><br>In terms of conflicting with the purposes of the Green Belt, dealing with York first, Policy SP2 of the York Local Plan at paragraph 1.28 states that "*the main purpose of the Green Belt around York is to preserve the setting and the special character of the historic City".* Given the separation between the historic City and the proposed works, which is approximately 5km, the construction of a relatively short section of new overhead line |

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| | Belt arising from the development are clearly outweighed by other considerations. Para 151 of the NPPF acknowledges that many elements of renewable energy projects will comprise inappropriate development and VSC need to be demonstrated to proceed. Such VSC can include the wider environmental benefits associated with increased production of energy from renewable sources. It is acknowledges that this project is intended to support the production of energy from renewable sources. The VSC put forward by the developers needs to be considered alongside any other identified harm arising from the scheme. These are matters for the Examining Authority to weigh up in the balance in the decision-making process. | (5.85km), and location of the Overton substation and Shipton CSECs (**Works Plan Section B (Document 2.6.2) [APP-021]**, would not therefore have an effect on the purposes of the designation. This is owing to the distance between the historic City and the proposed works and the intervening topography and vegetation.<br><br>In respect of the proposed Overton Substation and Shipton CSECs, whilst considered engineering operations that do not harm the purposes of the Green Belt, National Grid recognise by virtue of the density of the proposed infrastructure, and the size of its physical footprint, together with the requirement for security fencing, these works may be considered to be inappropriate development because they would not preserve the openness of the Green Belt. As explained above, National Grid consider that very special circumstances apply to the Project, and these very special circumstances would apply irrespective of whether the entire Project or part only is considered to be inappropriate development.<br><br>In terms of the Leeds Green Belt, the proposed CSECs at Tadcaster (**Works Plan Section D (Document 2.6.4) [APP-023]**, the reconductoring works and the new Monk Fryston Substation (**Works Plan Section F (Document 2.6.6) [APP-025]** would fall within the Leeds Green Belt. As stated above, for the CSEC and substation, whilst considered engineering operations, that do not harm the purposes of the Green Belt, it is recognised they may be considered to be inappropriate development as they would not preserve the openness of the Green Belt for the reasons listed above. Again, National Grid consider that very special circumstances would apply to outweigh any harm as set out below. |

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| | | Recognising that paragraph 148 of National Policy Statement (NPS) EN-1 requires an assessment of “any other harm resulting from the proposed development”, National Grid has set out its position on “any other harm” in the **Planning Statement (Document 7.1) [APP-202]**. The other harm identified is:<br>• increased activity;<br>• traffic;<br>• noise;<br>• light pollution;<br>• effects on landscape character; and<br>• visual effect.<br>National Grid’s assessment against the above items is set out in **paragraph 7.4.10-7.4.14, in the Planning Statement (Document 7.1) [APP-202]** and concludes that any harm would be limited for increased activity, traffic, noise and light pollution as this would be associated with the construction period which would be temporary. Once the project is operational, the effects would be very limited or result in no harm.<br><br>In terms of the adverse effects on landscape character, and in accordance with paragraph 5.10.19 of NPS EN-1, whilst operational effects could not be reduced to a magnitude that is not significant, the number of receptors affected has been minimised as far as possible through the iterative design process described in the **Design and Access Statement (Document 7.2) [APP-203]**.<br><br>For visual effects, and despite the iterative design process, it is recognised that there would be adverse effects as a result of the Project. These effects would be further minimised by the use of landscaping (i.e. planting and bunding where appropriate). The planting and bunding in itself would also not cause unacceptable harm to the Green Belt as it would be |

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| | | appropriate to the locality in terms of scale, and provenance, and in addition to a screening function would have a beneficial contribution to landscape character, green infrastructure and biodiversity objectives.<br><br>In any event, the very special circumstances for the Project clearly outweigh any harm to the Green Belt and any other harm as a result of the Project. Very special circumstances are summarised in **Section 3.3 of the Planning Statement (Document 7.1) [APP-202]** and explained in the **Updated Need Case Document (Document 7.4) [APP-205]**. These comprise the following:<br>• an **urgent need** to reinforce the network in the Yorkshire area by 2027 in order to enable connection of three contracted customers. This will support the production of energy from renewable sources, particularly in terms of being able to connect onshore and additional off-shore wind (an energy target of 50GW by 2030) to the transmission network. The Project will enable The Continental Link, The Atlantic Super Connection and Hornsea Offshore P4, in support of delivering this target;<br>• the need to ensure future connections of renewable generation can be connected without **incurring significant constraint costs**;<br>• the requirement to meet **National Grid's transmission licence obligations** which are to develop and maintain an efficient, coordinated and economical transmission system;<br>• a national **climate emergency** which has been declared by the UK Parliament that recognises the need for urgent action to reduce or halt climate change in order to prevent further environmental damage;<br>• the requirement to meet **Net Zero** which includes moving from fossil fuels to renewable energy, and increasing |

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| | | reliance on alternative energy sources including electricity; and<br>• the **national energy need** which recognises that electricity demand will at least double by 2050 as the UK shifts to clean energy to charge electric vehicles, heat homes and power industry and the related need to reinforce the National Electricity Transmission System.<br><br>These factors are all considered to be very special circumstances that would carry substantial weight sufficient to outweigh harm to the Green Belt and any other harm. |

## 2.19 RR-020 [Linda Palmer]

Table 2.19 – RR-020 [Linda Palmer]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 20.1 | Am very concerned about the dust and noise to local community in Lumby. Also additional traffic on the already busy A65. It is very difficult to get out of Butts Lane now because of traffic. Construction traffic will make it virtually impossible. Also this is a Green Belt area. I am concerned about the loss of Green Belt and Amenity. My hamlet, Lumby will be blighted by this project. | National Grid notes the issues raised in this relevant representation. All matters raised have been addressed below in the order provided within the Relevant Representation National Grid is in the process of engaging with this Interested Party to discuss the potential environmental effects of the Project and provide signposting information on the environmental assessments undertaken.<br>The Interested Party attended the Preliminary Meeting, Open Floor Hearing and Issue Specific Hearing on the 22 and 23 March, it was agreed in person that a meeting would be set up at which National Grid would discuss further the matters raised in this representation and at the hearings. Communications are taking place to establish a date for this meeting.<br><br><u>Dust</u><br>Dust sources relating to construction activities and the construction access roads have been considered in the **ES Chapter 13: Air Quality (Document 5.2.13) [APP-085]**.<br><br>In the **ES Chapter 13: Air Quality (Document 5.2.13) [APP-085]** dust emissions from construction activities in the Monk Fryston Area were assessed. The residential properties along Butts Lane, Lumby fall within 50m of the site haul route 500m from the access point that would be used by construction traffic to access the proposed works at Monk Fryston. Therefore, they have been considered within the assessment in line with the Institute of Air Quality Management (IAQM) (2016) *Guidance on* |

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| | | *the Assessment of Dust from Demolition and Construction* screening criteria.<br><br>Dust soiling effects on people and property in relation to construction traffic using the construction access roads was fully assessed in the **ES Chapter 13: Air Quality (Document 5.2.13) [APP-085]**. The assessment concluded that with no mitigation in place the risk of dust soiling from construction traffic is medium. This finding that without dust controls there would be a medium risk of impact has informed the dust management measures that would be implemented as part of the Project (see **Table 13.20 of ES Chapter 13: Air Quality (Document 5.2.13) [APP-085]**). These measures are expected to ensure that the risk of impact is reduced to negligible levels. These measures have informed the **Appendix 3B Code of Construction Practice (CoCP) (Document 5.3.3B) [APP-095]** and are secured via **Requirement 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br><u>Noise</u><br>Noise sources relating to construction works and construction road traffic, and the operation of the new Monk Fryston substation, have been considered in the **ES Chapter 14: Noise and Vibration (Document 5.2.14) [APP-086]**.<br><br>The noise climate in Lumby was measured, as set out in the Environmental Statement **Appendix 14A Baseline Noise Report (Document 5.3.14A) [APP-150]** and the monitoring location identifier MF4 specifically relates to this location (Field south of Red Hill Lane, to the west of The Orangery at Lumby Hall). The data from the noise survey was used to inform the design of the new Monk Fryston substation.<br>In the **ES Chapter 14: Noise and Vibration (Document 5.2.14) [APP-086]**, the representative location SEL15, The Cottage, Butts Lane, Lumby (located at British National Grid |

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| | | reference 448607,430132) has been used to evaluate noise for the wider Lumby community.<br><br>Construction noise is fully evaluated within the Environmental Statement **Appendix 14C Construction Modelling Results (Document 5.3.14C) [APP-152]**. In summary, the worst-case noise levels (without mitigation) were significantly below the threshold of significance at the representative location for all times of the day and night. The assessment included worst case plant assumptions and accumulation of noise levels from several construction activities that may not overlap. As such, the assessment is considered to be conservative and predicted levels higher than will likely be experienced in practice.<br><br>That does not mean that the construction works will be inaudible, but it is considered that amenity in relation to noise will not be significantly lowered in Lumby for the duration of the construction phase.<br><br>The assessment evaluated the operational noise from the proposed Monk Fryston Substation. The assessment was undertaken in accordance with British Standard 4142, the industry best practice. The conclusion of the assessment is reported in **Table 14.30 of the ES Chapter 14: Noise and Vibration (Document 5.2.14) [APP-086]**. The highest predicted noise levels from the proposed Monk Fryston substation at Lumby, using the national standard methodology, BS 4142:2014, were specific sound level of 8 dB(A), with an applied penalty rating of +6dB for tonality. The resultant rating level of 14 dB $L_{Ar,Tr}$ was therefore predicted at Lumby. The nighttime background sound level was 41 dB $L_{A90,15min}$ and so a level difference of -27 dB between background sound level and the predicted rating level was calculated. This means that the noise levels from the proposed substation, as experienced outside of the properties, with a 6 dB penalty, in Lumby will be 27 dB lower than the existing background sound levels. |

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| | | Although not defined in BS4142:2014, a level where the rating noise level is 10 dB or more below the existing background level, is considered the No Observable Effect Level (NOEL) without considering context. As the predicted difference level in this case, is a further 17 dB lower than this NOEL, it is extremely unlikely that the noise from the proposed substation will be audible in Lumby and any such noise effect would be negligible.<br><br>Road traffic during the construction phase was evaluated for its potential to give rise to changes in road noise generation relative to the existing baseline. The changes in traffic noise around Lumby (on the A63 and surrounding network) are negligible during the construction phase.<br><br><u>Transport</u><br>As part of the DCO process a thorough assessment of the likely impact of traffic upon the local road network and highway assets during the construction phase of works has been completed. Traffic volumes on the A63 corridor have been observed and fall within the link capacity of this classification of road. The **ES Chapter 12 Traffic and Transport (Document 5.2.12) [APP-084]** sets out that on the A63, between Rawfield Lane and the A162, the maximum number of Heavy Goods Vehicle (HGV) movements per day is 50 and for Light Vehicles (LV) is 46 movements. This equates to approximately four HGV and four LV movements per hour over the course of a typical day in the peak week for construction traffic. It is National Grid's view that the increase in trips will not have a material impact upon the capacity of the A63/Butts Lane priority junction (especially outside of the peak operating hours, which is when the majority of movements will occur). |

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| | | Furthermore, the proposed routing strategy requires all construction traffic to approach Butts Lane from A1(M) Junction 42 and hence no vehicles will be required to perform a right-turn manoeuvre into Butts Lane from the A63 or obstruct residents' ability to egress safely from the priority junction. As detailed in **Table 4.2** (Local road routes from SRN to construction access points) of the **CTMP (Document 5.3.3F) [APP-099]** National Grid has committed to the following measure for construction traffic which is a left in/left out turning at the A63/ Rawfield Lane junction. The CTMP is secured via **Requirement 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011].** This means construction traffic exiting Butts Lane will not be able to cross the junction into Rawfield Lane, and will have to travel to the roundabout and enter Rawfield Lane via a left turn. Construction traffic can also not cross the junction from Rawfield Lane to Butts Lane, and instead will have to turn left out of Rawfield Lane and travel to the roundabout, and enter Butts Lane via a left turn. A maximum of eight HGV movements and 12 LV movements along Butts Lane will occur per day during the construction period, this equates to less than one HVG movement and one LV movement per hour. Typically, four or fewer HGV and LV movements will occur per day along Butts Lane, during the very few weeks during the construction period that Butts Lane is used. The proposed routing strategy is further detailed in **Appendix 3F Construction Traffic Management Plan (CTMP) (Document 5.3.3F) [APP-099]**. The CTMP would be secured by **Requirement 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011].**<br><br><u>Loss of Green Belt</u><br>A Green Belt assessment has been carried out as part of the application process, and this is included in **paragraphs 7.3.59-7.3.105 and 7.4.7-7.4.17 of the Planning Statement (Document 7.1) [APP-202]**. |

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| | | It sets out how due regard has been had to the impacts of the development on the Green Belt. It identifies that overhead lines are considered engineering operations which may not be considered inappropriate development. However it recognises that associated infrastructure such as substations and Cable Sealing End Compounds may be considered inappropriate in the Green Belt.<br><br>Where this is the case the landscape and visual impact assessment has carefully considered the visual impact of the proposed development on the landscape and receptors in it, and identified mitigation measures where relevant. This is of particular importance around the substation siting areas where planting has been identified to reduce significant effects.<br><br>Where development is considered to be inappropriate development in the Green Belt (i.e. in relation to the substation and cable sealing end compounds), regardless of the level of harm, very special circumstances have been demonstrated that overcome the harm by nature of inappropriate development, together with any other harm to the Green Belt. The urgent and compelling needs case in terms of the shift in national energy need, the requirement to meet Net Zero by 2050, and the support that Yorkshire GREEN provides for the movement of energy from renewable sources, is considered to amount to very special circumstances that outweigh the limited harm to the Green Belt that would arise from the proposed development.<br><br><u>Amenity</u><br>In terms of visual amenity, the residents of the settlement of Lumby are assessed in **Table 6G.82 of Appendix 6G Visual Receptor Assessment (Document 5.3.6G) [APP-114]**. The |

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| | | changes to views are represented by the photomontage from Viewpoint 24 on Quarry Lane in **Figure 6.64** of the **(Part 14 of 15) ES Chapter 6 Landscape and Visual Figures (Document 5.4.6) [APP-180]**. The assessment from Viewpoint 24 is set out within **Table 6H.26** of **Appendix 6H Viewpoint Assessment (Document 5.3.6H) [APP-115]**.<br><br>In summary, there is predicted to be limited visibility of construction works and the operational phase of the Project from the village with the potential exception of the southernmost dwelling off Butts Lane and several properties at the north eastern edge of the village, off Old Quarry Lane. Where construction works including temporary pylons would be visible, over 900m in the distance, they would be seen in the context of the existing Monk Fryston substation and pylons. The magnitude of change would be up to a low level, with a Moderate adverse effect upon the visual amenity of some residents, that would be Not Significant.<br><br>During the operational phase, the changes would comprise views of the proposed substation set in front of the existing substation, surrounded by earth mounding with woodland planting. There would also be up to a 13m increase in the height of the replacement pylons. These changes compared with the baseline views would represent a Low magnitude of change and a Moderate adverse effect that would not be Not Significant.<br><br>Consideration of the potential for effects arising from the Project on neighbourhood amenity as a determinant of the health and wellbeing of local residents is presented in **Section 15.9 of ES Chapter 15: Health and Wellbeing (Document 5.2.15) [APP-087]**. This is set out as part of the assessment of Noise, Air Quality and Landscape Amenity effects. The assessment drew on the conclusions of the assessments conducted in **ES Chapter 13: Air Quality (Document 5.2.13) [APP-085]**, **ES** |

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| | | **Chapter 14: Noise and Vibration (Document 5.2.14) [APP-086]**, and **ES Chapter 6: Landscape and Visual (Document 5.2.6) [APP-078]**.<br><br>The overall effect of the Project on neighbourhood amenity during construction was assessed to be neutral on account of the low risk that changes in air quality and/or noise and vibration resulting from the construction of the Project would pose to human health. Although a number of receptors would experience adverse effects relating to landscape amenity, these effects will be temporary in nature and would be managed through the use of best practicable means included in the **Appendix 3B Code of Construction Practice (CoCP) (Document 5.3.3B) [APP-095]** and secured under **Requirements 8 and 9 of the draft Development Consent Order (DCO) (Document 3.1(B)) [AS-011]**.<br><br>During operation, the overall effect of the Project on neighbourhood amenity was assessed to be neutral. Any effects on landscape amenity would be managed through embedded environmental measures outlined in **Table 6.8 of ES Chapter 6: Landscape and Visual (Document 5.2.6) [APP-078]** and secured under **Requirements 3, 8 and 9 of the draft Development Consent Order (Document 3.1(B)) [AS-011])**. Additional landscape and visual mitigation measures are detailed in the Outline Landscape Mitigation Plans in **ES Chapter 3: Description of the Project Figures (Document 5.4.3) [APP-164]** and secured under **Requirements 8 and 9 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br>Effects on air quality would be managed through measures outlined in **Table 13.20 of ES Chapter 13: Air Quality (Document 5.2.13) [APP-085]** and secured under **Requirements 5 and 6 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**. |

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| | | Effects on noise and vibration would be managed through embedded measures outlined in **Table 14.9 of ES Chapter 14: Noise and Vibration (Document 5.2.14) [APP-086]** and secured under **Requirements 3 and 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**. Additional noise and vibration mitigation measures are detailed in **Appendix 3H Noise and Vibration Management Plan (Document 5.3.3H) [APP-101]** and secured under **Requirement 16 of the draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br>For residents of Lumby and Butts Lane specifically, the relevant assessments for consideration of impacts on neighbourhood amenity are described above and are summarised briefly here. Noise dust emissions relating to the construction of the nearby Monk Fryston Substation were assessed to be of medium risk and with the implementation of management measures outlined, the risk of construction dust to receptors in Lumby was assessed to be negligible. The noise climate in Lumby, based on the representative location SEL15 used to evaluate noise for the wider Lumby community, concluded that both construction and operational noise from the Project would be not significant within Lumby. Finally, the changes in the visual amenity of residents of Lumby and Butts Lane on account of the Project were assessed to be not significant during both the construction and operational phases. Overall, as the relevant assessments for consideration of impacts on neighbourhood amenity as a determinant of health at Lumby and Butts Lane conclude either negligible or not significant effects, the effect on health in this regard for local residents would be neutral.<br><br>Blight |

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| | | Blight has a statutory definition. National Grid does not consider that the impact of the Project would meet the statutory definition. |

## 2.20 RR-021 [Lister Haigh on behalf of Chris Lister]

Table 2.20 – RR-021 [Lister Haigh on behalf of Chris Lister]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 21.1 | The access required will conflict with agricultural use particularly during busy periods such as harvest | National Grid has agreed Heads of Terms for a voluntary agreement with the Landowner and voluntary terms are in legal drafting.<br><br>National Grid notes the concern from the Landowner around shared access during busy periods. The proposed access routes have been developed through the non-statutory and statutory consultation process of the Project. National Grid will continue to engage with the Landowner to reduce the impact of these where possible. National Grid will use a Land Officer/Agricultural Liaison Officer (ALO) to provide information and communications to local landowners and those with land-related interests regarding daily construction activities to minimise disruption to agricultural activities, as detailed at **Paragraph 1.3.7** of the **Outline Soil Management Plan (Document 5.3.3E) [APP-098]** which is secured by **Requirement 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** and is a certified document listed within article 48.<br><br>The ALO will ensure access will not be restricted to Landowners during busy periods and normal agricultural activities can continue. During National Grid's programme of intrusive surveys that were undertaken during spring and summer 2022, National Grid used the Landowner's farmstead for its main site compound and developed good working relations with the Landowner due to the successful and positive |

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| | | management of the interface between the Project and the Landowner's farming business.<br><br>Where it would not be safe to allow access, National Grid is obliged to compensate all owners and occupiers of land taken for temporary possession to carry out the authorised development for any loss or damage arising from the exercise of rights in relation to the land and the obligation is secured under the proposals set out in **the Statement of Reasons (Document 4.1) [APP-069]**.<br><br>A meeting was held with the landowner's agent on 9 March 2023. The Relevant Representation was discussed as well as updates regarding the project. |

## 2.21 RR-022 [Lister Haigh on behalf of David Blacker]

Table 2.21 – RR-022 [Lister Haigh on behalf of David Blacker]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 22.1 | The location of new tower SP006 should be moved further North to reduce the impact on the use of the field. We have been told this can't happen from the existing angle tower SP007 "...because technically it would have increased the span length and imposed greater weight loading on the existing angle tower meaning that the existing foundations may well have been unsuitable, and electrical clearances could not have been achieved". | National Grid notes the issue raised in respect of the location of the new pylon SP006 for the Project and refers the Interested Party to the following documents submitted as part of the application for the Project in the first instance:<br><br>The new pylon SP006 and existing pylon SP007 are in Work No.5 as shown on Sheet 3 of 5 of **Works Plan Section B (Document 2.6.2) [APP-021]**.<br><br>**Table 7.3 of the Consultation Report (Document 6.1) [APP-195** summarises prescribed consultees' responses to the statutory consultation and National Grid's responses to these, with particular reference to pylons SP006 or SP007 which are set out within pages 224, 240 and 241. Further summarised in **paragraph 7.5.4 of the Consultation Report (Document 6.1) [APP-195]** are changes made to the Project as a result of statutory consultation. Additional reference is made in **paragraph 2.8.21 of ES Chapter 2 Project Need and Alternatives (Document 5.2.2) [APP-074]**.<br><br>In order to provide further context and respond as to why pylon SP006 was not moved further North, National Grid has set out further detail below.<br><br>Pylon SP007 is an existing pylon on the eastern side of the East Coast Mainline (ECML) railway that takes an approximately 70° change in the direction of the existing XCP |

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| | | line as it crosses the ECML railway and then heads in a southerly direction towards Poppleton Substation in the north-west of York.<br><br>Pylon SP007 is orientated on the bisect of the 70° angle to achieve a balance in opposing conductor tensile loads with a net pull inward on the angle. The resultant loads from these conductor forces coupled with varying climatic loads are taken by the pylon steelwork and transferred to foundations.<br><br>Due to the large change in direction of the existing line at SP007 and the loads to be resisted, the types of foundation originally installed are different on the inside two legs of the pylon from the outer two legs of the pylon.<br><br>The inner two pylon legs have foundations designed to resist compression loads. The two outer pylon legs have foundations designed to resist uplift loads.<br><br>On pylon SP007's upper steelwork body, the inner crossarms are designed to be short as the natural angle of the electricity-carrying conductors take the free hanging jumper loop (connects the ahead and back spans) away from the pylon body steelwork and maintain electrical clearances. Whereas, on the opposite side of the pylon, the outer crossarms are designed to be much longer to maintain electrical clearances as the natural angle of the conductors take the free hanging jumper loop in towards the pylon body steelwork.<br><br>The proposed works at new SP006 and existing SP007 involve a new section of 'SP' overhead line (OHL) parallel to the east of the ECML railway connecting Overton Substation to a part of the existing Monk Fryston to Poppleton OHL at SP007, and dismantling of a section of existing OHL. These works were |

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| | | designed and achieved with the reuse of existing asset SP007 and with SP006 in the proposed position. National Grid seeks to reuse existing assets where practicable to reduce environmental impact.<br><br>The distance from existing pylon SP007 to the edge of the field, beyond the current position of SP006, would be approximately 360m. The existing span SP007 – XCP013 across the railway is approximately 280m. Additional weight and conductor climatic loads would result from any increase in span length.<br><br>Existing pylon SP007 is orientated on the bisect of the existing angle of deviation from XCP013 (approximately 70°). The proposed arrangement of a new span from SP007 to SP006 reduces the angle of deviation to approximately 35°, pulling the electricity-carrying conductors closer to the pylon steelwork.<br><br>Moving SP006 to the far north of the field would worsen this angle further and would cause even greater pulling of the conductor towards the pylon steelwork resulting in electrical clearances (safety distances) not being achieved.<br><br>Other factors also considered in positioning pylon SP006 in the far north of the field included:<br>• Maintaining a sufficient working area for construction. It was necessary to avoid reducing the working area, which would be constrained by Hurns Gutter, the stand-off distance required to Hurns Gutter (environmental), and/or the vegetation adjacent the ECML railway;<br>• Reducing hazard/risk during construction by avoiding placing SP006 near the bridge over Hurns Gutter, thereby avoiding impeding access from SP005; |

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| | | • Reducing vegetation loss. Reducing oversailing and conductor blowout over trees along Hurns Gutter and subsequent vegetation management to avoid growth under the conductors;<br>• Avoiding moving the pylon further into the flood zone;<br>• Avoiding limiting options for the stringing position around SP006, if required during construction;<br>• Avoiding moving SP006 towards the vegetation adjacent to the ECML, resulting in either a reduced construction working area or the loss of vegetation for the equivalent working area and future vegetation growth management;<br>• If SP006 were moved further west than is proposed it would create an angle on SP005, which would then need to become a tension pylon (a larger pylon); and<br>• Maintaining sufficient distance to the rail property boundary from the installing crane to maintain a safety clearance in the event the crane falls, and avoid track possession during construction and future maintenance.<br><br>In summary, moving SP006 would reduce the angle of deviation on existing XCP007, pulling the conductors closer to the pylon body, resulting in electrical clearances (safety distances) not being achieved. Moving SP006 would also increase the span length, subsequently increasing the weight and climatic loads on SP007.<br><br>Furthermore, due to space constraints, SP006 cannot be moved further as sufficiently sized working areas are required around SP006 that maintain a stand-off distance from Hurns Gutter (watercourse), and this would also position the pylon further within the flood zone. Repositioning of this pylon would also result in increased vegetation loss adjacent to the ECML railway and along Hurns Gutter. |

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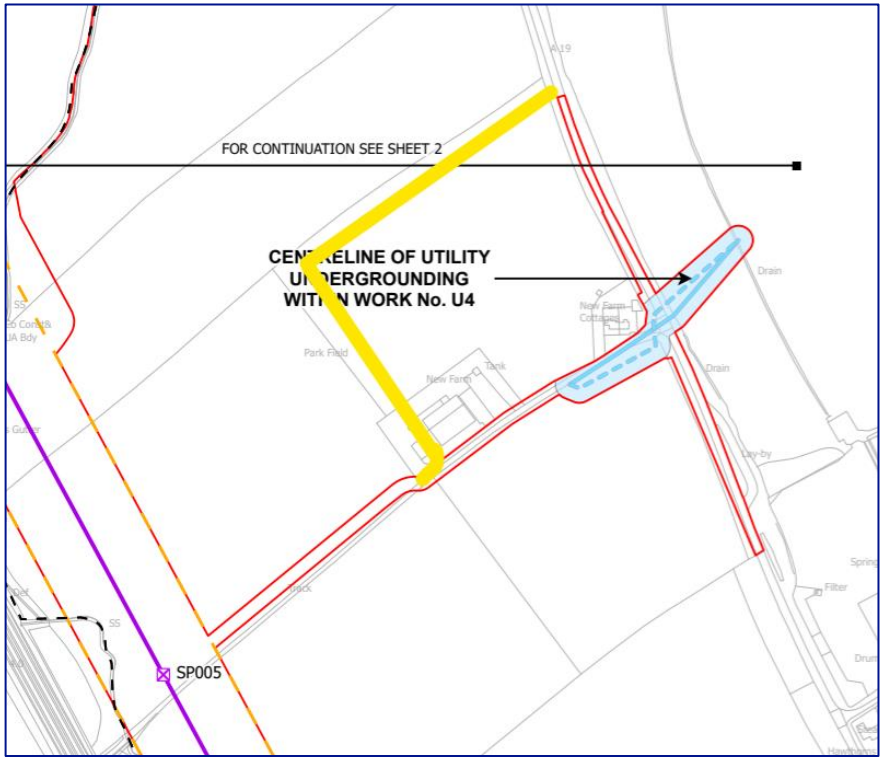
| | | There is a requirement to maintain a sufficient distance away from the rail property for safety clearances from falling machinery and equipment, and to avoid track possessions during construction and future maintenance. This, and the aforementioned summarise why SP006 is located in its current position. |
| 22.2 | However, the current distance is much further between XCP013 and SP007 than the distance proposed to SP006. If the SP007 pylon is in need of upgrading to allow a similar span to those between the other new pylons then that should be done instead of having a much shorter span in order to retain an old pylon that is of a lower specification that needed. | The distance to SP006 was one factor considered and as explained in response to 22.1 above, there were many other factors in the decision to position pylon SP006 where it is proposed (please refer to 22.1).<br><br>Regarding the upgrading of the existing pylon, National Grid seek to reuse existing assets where practicable to reduce the environmental impact associated with new infrastructure and as outlined in 22.1 above, this has been achieved. |
| 22.3 | The requirement to use the access at New Farm for the scheme will conflict with the agricultural use. Additionally, 2.6.2 shows there is undergrounding of utility work No U4 in the entrance. We request an alternative access track be provided through the existing gateway west from the A19 then south to the farmstead running next to the field boundaries. The existing gateway is next to the field boundary shown on Traffic Regulation Order plan 2.12.2 just south of TR13 and north of the red line denoting the extent of the works. | National Grid notes the request for a new alternative access to SP005 utilising the existing gateway in the field to the north of New Farm, south of TR13 within **Traffic Regulation Order Plan Section B (Document 2.12.2) [APP-057]**.<br><br>The access requested follows field boundaries to re-join back onto the current proposed access via the farmstead as interpreted in **Figure 22.3.1**, below (for illustrative purposes only).<br><br>The length of the alternative access is approximately 490m, compared to the 230m of the current proposed access. The requested access, as interpreted, is shown below in **Figure 22.3.1** in yellow (for illustrative purposes only). This has not |

been assessed as part of the application for the Project and is outside of the Order limits.

Figure 22.3.1 – Requested alternative access route marked in yellow onto Works Plan Section B (Document 2.6.2) [APP-021].




The current proposal allows for a 40m wide bellmouth and a 12m access swathe from the A19 to pylon SP005. This is to allow the space required for crane access during pylon erection. Due to the size requirement of the access, it is necessary to dismantle and underground the 11kV overhead wires attached to the existing wood pole which is located in close proximity to the access entrance. This will need to be undertaken prior to overhead line construction works.

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| | | The current access proposal utilises an existing bellmouth and partially utilises an access track proposed for widening and improvements, with a small section of new stone access in the field to the north. The alternative access suggested is, via an existing gate directly off the A19 which would require installation of a full new bellmouth suitable for construction works. In addition, the suggested alternative access to SP005 would consist of a hard surface (stone or similar) to facilitate construction access. The current proposal utilises predominantly an existing access with proposed upgrades, whereas the new access would need full installation of a new bellmouth and access, overall resulting in greater land and environmental impact than the current proposal, with a greater quantity of material.<br><br>The works to build these pylons and string the new section of overhead line are spread over a large period of time, approximately one year. However, the works will not be ongoing continuously for that period and as a result, there will be longer periods of time where minimal use and disruption is envisaged. The potential construction traffic likely to utilise this access can be broken down into the following elements of work for pylons SP005 and SP006, including, but not necessarily limited to:<br>• Access improvements and construction;<br>• Pylon foundations;<br>• Pylon work area preparation;<br>• Pylon steelwork delivery;<br>• Pylon assembly and erection;<br>• Overhead line stringing taking place predominantly at the tension pylon SP006, however lesser works will be required at suspension pylon SP005; and |

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| | | • Reinstatement of access and work areas.<br>• Separate undergrounding of the 11kV overhead wires co-ordinated by Northern PowerGrid.<br><br>In summary, construction work is not all happening continuously. It will follow the approximate order of: access created, foundations installed (with time allowed for concrete to cure), work area preparation, import pylon steelwork and assemble, pylon erection, stringing works to suit other programmed outages and corresponding pre-booked track possessions of the ECML railway to enable work to be carried out to ensure power supply is maintained to Poppleton Substation, York.<br><br>National Grid notes the concern from the Landowner around shared access during busy periods. National Grid will use a Land Officer/Agricultural Liaison Officer (ALO) to provide information and communications to local landowners and those with land-related interests regarding daily construction activities to minimise disruption to agricultural activities, as detailed at **Paragraph 1.3.7** of the **Outline Soil Management Plan (Document 5.3.3E) [APP-098]** which is secured by **Requirement 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** and is a certified document listed within article 48. The Lands Officer/ALO will ensure access will not be restricted to Landowners during busy periods and normal agricultural activities can continue with minimal disruption.<br><br>Where it would not be safe to allow access, National Grid is obliged to compensate all owners and occupiers of land taken for temporary possession to carry out the authorised development for any loss or damage arising from the exercise of rights in relation to the land and this obligation is secured via |

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| | | **Article 36(7) of the Draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br>In conclusion, the suggested access is not considered an appropriate alternative as it is longer in length and will require more construction works and materials in comparison to the current access proposal, ultimately resulting in greater land and environmental impacts. The programmed works are proposed over an approximate one year period where use for construction activities will not be continuous. During times of construction activity, through commitments secured in the **Appendix 3E Outline Soil Management Plan (Document 5.3.3E) [APP-098]**, the ALO will communicate the Project's daily construction activities to ensure landowner access will not be restricted and normal agricultural operations can continue with minimum disruption.<br><br>A meeting was held with the landowner's agent on 9 March 2023. The Relevant Representation was discussed as well as updates regarding the project. |

## 2.22 RR-023 [Lister Haigh on behalf of James Bell]

Table 2.22 – RR-023 [Lister Haigh on behalf of James Bell]

| Response Reference | Relevant Representation Issue | National Grid Response |
|---|---|---|
| 23.1 | These relate to the land at Overton affected by the substation and pylons from there. Purchase of pylon site B2-25 would lead to Land Registry difficulties in the future - this should be an easement like other pylons on the route. A right of way needs to be retained over the acquired land B2-39 to access B2-34. Access solely from the A19 would be dangerous. The pond to the east of the substation is shown as included in the purchase area but is not shown as being within the substation boundary. | The land at B2-25 has been included as Category 1 land within the **Book of Reference (Document 4.3) [APP-071]** to be acquired freehold. The land underneath and directly adjacent to the proposed pylon would no longer be able to be farmed and consequently has been shown as species rich grassland on the Outline Landscape Mitigation Strategy at **Figure 3.10 in ES Chapter 3 Description of the Project Figures (Document 5.4.3) [APP-164]**. An area of agricultural land that is not acquired is to be reinstated to the north of the pylon site B2-25.<br><br>National Grid notes the concerns around safety accessing solely from the A19 and confirms that all necessary rights would be granted to the Interested Party to access B2-34 and their remaining holding from B2-39. National Grid would welcome engagement from the Interested Party on the specific requirements for this access.<br><br>The pond east of the substation has been included as a Category 1 interest within the **Book of Reference (Document 4.3) [APP-071]** due to half of it being within the landscaping zone around the substation and the need to secure the future use of this land for landscaping purposes. |
| 23.2 | Access 2.7.2 - AP92 onto the A19 should be improved/widened. | The purpose of access point AP92 is to provide National Grid with future access to the watercourse (Hurns Gutter) location at which the surface water drainage discharge point is proposed. This access is envisaged to be used for inspection of the outfall |

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| | | to ensure no blockages or leaks of the drainage system are present. The frequency of this activity is not known, however based on other National Grid sites, it is likely to be required a small number of times throughout the life of the asset (approx. once a year on average). Inspection of the outfall can be completed by a person on foot, where they can drive to the proposed access entrance (off A19) to the field, park their car, and then walk along the watercourse for inspection. A requirement for a small jet vacuum/pump type vehicle to drive into the field and along the watercourse would be necessary only in the case where there was a blockage/leak in the outfall. For this reason, it is not deemed necessary to improve or widen the existing access as it is considered sufficient for the proposed use in its current state. |
| 23.3 | AP87 - this will remove trees in a woodland planting scheme but this is not shown in 2.11.2 of the trees & hedgerows affected. These were planted at the same time as those shown at the south end of the substation field. There are also trees that were planted at the same time in the northern end of the field adjacent to the railway line west of the substation field and these are not shown as affected either. | The areas of recent woodland planting are not shown on **Trees and Hedgerows Potentially Affected Plan Section B (Document 2.11.2) [APP-051]** as the size of the newly planted trees in this location means that they are too small to be considered by a standard Tree Survey. This is in line with guidance provided in *BS5837:2012 Trees in Relation to Design, Demolition and Construction – Recommendations*[3]. However, these areas of woodland planting have been taken into account in the biodiversity assessment of the Project and are shown on **Extended Phase 1 Habitat Results Plan (Figure 8.4, Sheet 4 of 18 of ES Chapter 8 Biodiversity Figures (Document 5.4.8) [APP-183])** as habitat type A1.1.2: Broadleaved woodland - plantation. |
| 23.4 | 2.12.2 Traffic management TR08 should be located to manage the exit onto the A19 from the substation field. | With regards to TR08: The access/exit off the A19 is not intended to be used during construction. This is an existing field |

[3] British Standards Institution, 2012, BS 5837:2012 – Trees in Relation to Design, Demolition and Construction – Recommendations

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| | Traffic management TR09 - TR10 is of great concern due to the multiple vehicle movements from Overton Grange at all times and during harvest these will be much more frequent and many more movements of large vehicles including grain trailers to and from fields from July to September. | entrance, for which National Grid requires rights to allow for future maintenance checks of the proposed drainage outfall. As explained above, frequency of use for this access is likely to be low and require one small vehicle at any one time for a person to access on foot or to drive to the outfall location. This access therefore requires no traffic management.<br><br>With regards to TR09-TR10: Traffic surveys were undertaken on Overton Road (immediately north of the Overton Grange access) to inform **ES Chapter 12 Traffic and Transport (Document 5.2.12) [APP-085]**, during March 2022 which recorded a weekday average of 63 vehicle movements northbound and 72 vehicle movements southbound on Overton Road. Generally, Department for Transport guidance indicates that it is not appropriate for traffic surveys to be undertaken during the school holidays (and hence the harvest season) as these are non-neutral time periods.<br><br>During the construction period the peak week (week 96) for construction traffic on Overton Road would result in up to 41 additional total traffic movements including 30 HGV movements per day. Within **Table 12.32 of ES Chapter 12 Traffic and Transport (Document 5.2.12) [APP-085]** this traffic impact was subject to detailed assessment and assessed as not significant. National Grid will use a Land Officer/Agricultural Liaison Officer (ALO) to provide information and communications to local landowners and those with land-related interests regarding daily construction activities to minimise disruption to agricultural activities, as detailed at **Paragraph 1.3.7** of the **Outline Soil Management Plan (Document 5.3.3E) [APP-098]** which is secured by **Requirement 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** and is a certified document listed within article 48. The Lands Officer/ALO would ensure access |

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| | | will not be restricted to Landowners during busy periods and normal agricultural activities can continue.<br><br>A meeting was held with the landowner and his agent on 9 March 2023 at which all comments raised in this Relevant Representation were discussed as well as updates regarding the Project. |

## 2.23 RR-024 [Lister Haigh on behalf of Marion Blacker]

Table 2.23 – RR-024 [Lister Haigh on behalf of Marion Blacker]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 24.1 | The location of new tower SP006 should be moved further North to reduce the impact on the use of the field. We have been told this can't happen from the existing angle tower SP007 "...because technically it would have increased the span length and imposed greater weight loading on the existing angle tower meaning that the existing foundations may well have been unsuitable, and electrical clearances could not have been achieved". | National Grid notes the issue raised in respect of the location of the new pylon SP006 for the Project and refers the Interested Party to the following documents submitted as part of the application for the Project in the first instance:<br><br>The new pylon SP006 and existing pylon SP007 are in Work No.5 as shown on **Sheet 3 of 5 of Works Plan Section B (Document 2.6.2) [APP-021]**.<br><br>**Table 7.3 of the Consultation Report (Document 6.1) [APP-195** summarises prescribed consultees' responses to the statutory consultation and National Grid's responses to these, with particular reference to pylons SP006 or SP007 set out within **pages 224, 240 and 241 of the Consultation Report (Document 6.1) [APP-195]**. Further summarised in **paragraph 7.5.4 of the Consultation Report (Document 6.1) [APP-195]** are changes made to the Project as a result of statutory consultation. Additional reference is made in paragraph **2.8.21 of ES Chapter 2 Project Need and Alternatives (Document 5.2.2) [APP-074]**.<br><br>In order to provide further context and respond as to why pylon SP006 was not moved further North, National Grid has set out further detail below.<br><br>Pylon SP007 is an existing pylon on the eastern side of the East Coast Mainline (ECML) railway that takes an |

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| | | approximately 70° change in the direction of the existing XCP line as it crosses the ECML railway and then heads in a southerly direction towards Poppleton Substation in the north-west of York.<br><br>Pylon SP007 is orientated on the bisect of the 70° angle to achieve a balance in opposing conductor tensile loads with a net pull inward on the angle. The resultant loads from these conductor forces coupled with varying climatic loads are taken by the pylon steelwork and transferred to foundations.<br><br>Due to the large change in direction of the existing line at SP007 and the loads to be resisted the types of foundation originally installed are different on the inside two legs of the pylon from the outer two legs of the pylon.<br><br>The inner two pylon legs have foundations designed to resist compression loads. The two outer pylon legs have foundations designed to resist uplift loads.<br><br>On pylon SP007's upper steelwork body, the inner crossarms are designed to be short as the natural angle of the electricity-carrying conductors take the free hanging jumper loop (connects the ahead and back spans) away from the pylon body steelwork and maintain electrical clearances. Whereas, on the opposite side of the pylon, the outer crossarms are designed to be much longer to maintain electrical clearances as the natural angle of the conductors take the free hanging jumper loop in towards the pylon body steelwork.<br><br>The proposed works at new SP006 and existing SP007 involve a new section of 'SP' overhead line (OHL) parallel to the east of the ECML railway connecting Overton Substation to a part of the existing Monk Fryston to Poppleton OHL at SP007, and |

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| | | dismantling of a section of existing OHL. These works were designed and achieved with the reuse of existing asset SP007 and with SP006 in the proposed position. National Grid seek to reuse existing assets where practicable to reduce environmental impact.<br><br>The distance from existing pylon SP007 to the edge of the field, beyond the current position of SP006, would be approximately 360m. The existing span SP007 – XCP013 across the railway is approximately 280m. Additional weight and conductor climatic loads would result from any increase in span length.<br><br>Existing pylon SP007 is orientated on the bisect of the existing angle of deviation from XCP013 (approximately 70°). The proposed arrangement of a new span from SP007 to SP006 reduces the angle of deviation to approximately 35°, pulling the electricity-carrying conductors closer to the pylon steelwork.<br><br>Moving SP006 to the far north of the field would worsen this angle further and would cause even greater pulling of the conductor towards the pylon steelwork resulting in electrical clearances (safety distances) not being achieved.<br><br>Other factors also considered positioning pylon SP006 in the far north of the field included:<br>• Maintaining a sufficient working area for construction. It was necessary to avoid reducing the working area, which would be constrained by Hurns Gutter, the stand-off distance required to Hurns Gutter (environmental), and/or the vegetation adjacent the ECML railway;<br>• Reducing hazard/risk during construction by avoiding placing SP006 near the bridge over Hurns Gutter thereby avoiding impeding access from SP005; |

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| | | • Reducing vegetation loss. Reducing oversailing and conductor blowout over trees along Hurns Gutter and subsequent vegetation management to avoid growth under the conductors;<br>• Avoiding moving the pylon further into the flood zone;<br>• Avoiding limiting options for the stringing position around SP006, if required during construction;<br>• Avoiding moving SP006 towards the vegetation adjacent to the ECML, resulting in either a reduced construction working area or the loss of vegetation for the equivalent working area and future vegetation growth management;<br>• If SP006 were moved further west than it is proposed it would create an angle on SP005, which would then need to become a tension pylon (a larger pylon); and<br>• Maintaining sufficient distance to the rail property boundary from the installing crane to maintain a safety clearance in the event the crane falls, and avoid track possession during construction and future maintenance.<br><br>In summary, moving SP006 would reduce the angle of deviation on existing XCP007, pulling the conductors closer to the pylon body, resulting in electrical clearances (safety distances) not being achieved. Moving SP006 would also increase the span length, subsequently increasing the weight and climatic loads on SP007.<br><br>Furthermore, due to space constraints, SP006 cannot be moved further as sufficiently sized working areas are required around SP006 that maintain a stand-off distance from Hurns Gutter (watercourse), and this would also position the pylon further within the flood zone. Repositioning of this pylon would also result in increased vegetation loss adjacent to the ECML railway and along Hurns Gutter. |

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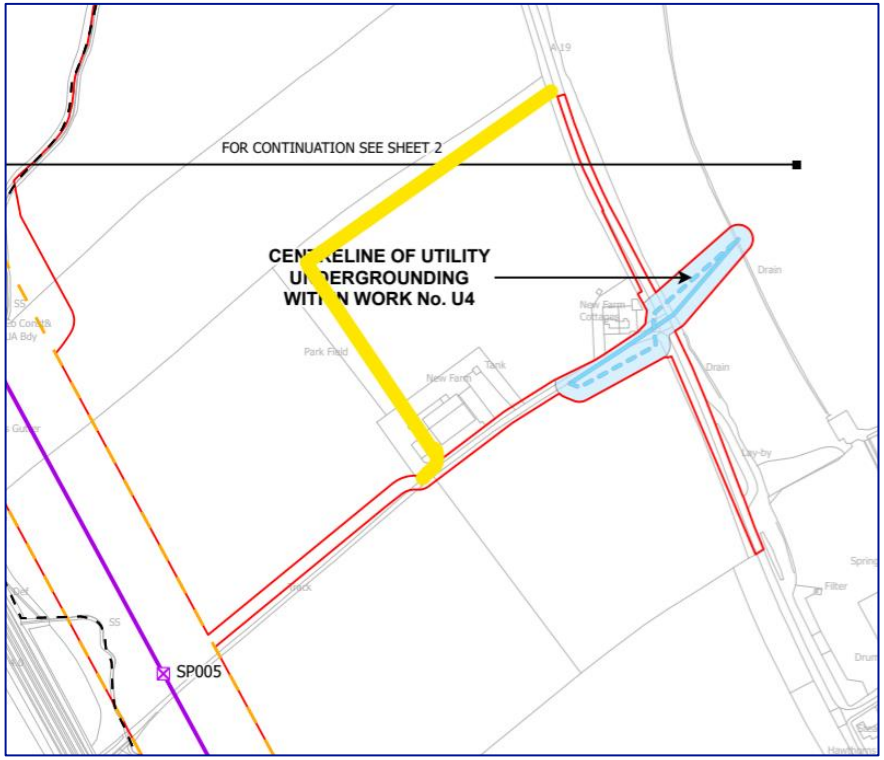
| | | There is a requirement to maintain a sufficient distance away from the rail property for safety clearances from falling machinery and equipment, and to avoid track possessions during construction and future maintenance. This, and the aforementioned summarise why SP006 is located in its current position. |
| 24.2 | However, the current distance is much further between XCP013 and SP007 than the distance proposed to SP006. If the SP007 pylon is in need of upgrading to allow a similar span to those between the other new pylons then that should be done instead of having a much shorter span in order to retain an old pylon that is of a lower specification that needed. | The distance to SP006 was one factor considered and as explained at 24.1 above, there were many other factors in the decision to position pylon SP006 where it is proposed (please refer to 24.1).<br><br>Regarding the upgrading of the existing pylon, National Grid seek to reuse existing assets where practicable to reduce the environmental impacts associated with new infrastructure and as outlined in 24.1 this has been achieved. |
| 24.3 | The requirement to use the access at New Farm for the scheme will conflict with the agricultural use. Additionally, 2.6.2 shows there is undergrounding of utility work No U4 in the entrance. We request an alternative access track be provided through the existing gateway west from the A19 then south to the farmstead running next to the field boundaries. The existing gateway is next to the field boundary shown on Traffic Regulation Order plan 2.12.2 just south of TR13 and north of the red line denoting the extent of the works. | National Grid notes the request for a new alternative access to SP005 utilising the existing gateway in the field to the north of New Farm, south of TR13 within **Traffic Regulation Order Plan Section B (Document 2.12.2) [APP-057]**.<br><br>The access requested follows field boundaries to re-join back onto the current proposed access via the farmstead as interpreted in **Figure 24.3.1**, below (for illustrative purposes only).<br><br>The length of the alternative access is approximately 490m, compared to the 230m of the current proposed access. The requested access, as interpreted, is shown below in **Figure 24.3.1** in yellow (for illustrative purposes only). This has not been assessed as part of the application for the Project and is outside of the Order limits. |

Figure 24.3.1 – Requested alternative access route marked in yellow onto Works Plan Section B (Document 2.6.2) [APP-021].




The current proposal allows for a 40m wide bellmouth and a 12m access swathe from the A19 to pylon SP005. This is to allow the space required for crane access during pylon erection. Due to the size requirement of the access, it is necessary to dismantle and underground the 11kV overhead wires attached to the existing wood pole which is located in close proximity to the access entrance. This will need to be undertaken prior to overhead line construction works.

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| | | The current access proposal utilises an existing bellmouth and partially utilises an access track proposed for widening and improvements, with a small section of new stone access in the field to the north. The alternative access suggested is, via an existing gate directly off the A19 which would require installation of a full new bellmouth suitable for construction works. In addition, the suggested alternative access to SP005 would consist of a hard surface (stone or similar) to faciliate construction access. The current proposal utilises predominantly an existing access with proposed upgrades, whereas the new access would need full installation of a new bellmouth and access, overall resulting in greater land and environmental impact than the current proposal, with a greater quantity of material.<br><br>The works to build these pylons and string the new section of overhead line are spread over a large period of time, approximately one year. However, the works will not be ongoing continuously for that period and as a result, there will be longer periods of time where minimal use and disruption is envisaged.<br><br>The potential construction traffic likely to utilise this access can be broken down into the following elements of work for pylons SP005 and SP006, including, but not necessarily limited to:<br>• Access improvements and construction;<br>• Pylon foundations;<br>• Pylon work area preparation;<br>• Pylon steelwork delivery;<br>• Pylon assembly and erection;<br>• Overhead line stringing taking place predominantly at the tension pylon SP006, however lesser works will be required at suspension pylon SP005; and |

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| | | • Reinstatement of access and work areas.<br>• Separate undergrounding of the 11kV overhead wires co-ordinated by Northern PowerGrid.<br><br>In summary, construction work is not all happening continuously. It will follow the approximate order of: access created, foundations installed (with time allowed for concrete to cure), work area preparation, import pylon steelwork and assemble, pylon erection, stringing works to suit other programmed outages and corresponding pre-booked track possessions of the ECML railway to enable work to be carried out to ensure power supply is maintained to Poppleton Substation, York.<br><br>National Grid notes the concern from the Landowner around shared access during busy periods. National Grid will use a Land Officer/Agricultural Liaison Officer (ALO) to provide information and communications to local landowners and those with land-related interests regarding daily construction activities to minimise disruption to agricultural activities, as detailed at **Paragraph 1.3.7** of the **Outline Soil Management Plan (Document 5.3.3E) [APP-098]** which is secured by **Requirement 5 of the draft Development Consent Order (Document 3.1(B)) [AS-011]** and is a certified document listed within article 48. The Lands Officer/ALO will ensure access will not be restricted to Landowners during busy periods and normal agricultural activities can continue with minimal disruption.<br><br>Where it would not be safe to allow access, National Grid is obliged to compensate all owners and occupiers of land taken for temporary possession to carry out the authorised development for any loss or damage arising from the exercise of rights in relation to the land and the obligation is secured via |

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| | | **Article 36(7) of the Draft Development Consent Order (Document 3.1(B) [AS-011]**.<br><br>In conclusion, the suggested access is not considered an appropriate alternative as it is longer in length and will require more construction works and materials in comparison to the current access proposal, ultimately resulting in greater land and environmental impacts. The programmed works are proposed over an approximate one year period where use for construction activities will not be continuous. During times of construction activity, through commitments secured in **Appendix 3E Outline Soil Management Plan (Document 5.3.3E) [APP-098]**, the ALO will communicate the Project's daily construction activities to ensure landowner access will not be restricted and normal agricultural operations can continue with minimum disruption.<br><br>A meeting was held with the landowner's agent on 9 March 2023. The representation was discussed as well as updates regarding the Project.<br><br>The landowner also attended the Open Floor Hearing on 22 March 2023 at which they raised similar points to this representation. National Grid indicated that the points would be clarified within this response, and following the hearing was offered a further meeting should it be required. |

## 2.24 RR-025 [Lister Haigh on behalf of Richard Elliott]

Table 2.24 – RR-025 [Lister Haigh on behalf of Richard Elliott]

| Response Reference | Relevant Representation Issue | National Grid Response |
|---|---|---|
| 25.1 | The Works Plan 2.6.3 show works U8 undergrounding by the XC478 pylon but that line has already been put underground. The route starts as shown but instead of turning at right angles eastwards the undergrounding continues northerly on the east side of the field boundary that meets the A659 road. We were informed that the undergrounding work U7 would be from the A659 in the northwest to Garnett Terrace road to the south east. If the works terminate as shown the additional poles/structures in those locations will make field operations very difficult. If the full section cannot be put underground then moving the south east end of the undergrounding works just part of the way, to in line with the east west boundary further south would be a help. | National Grid acknowledge the response regarding the potential recent utility undergrounding at U8 and will seek further discussions with Northern Power Grid to confirm the undergrounding and its extent to be satisfied it is sufficient not to impact on the proposed works. If this is the case National Grid will not need to undertake the works at U8.<br><br>There is no proposal to underground U7 to the A659 but there may be some confusion with the U9 undergrounding which is being undergrounded to the A659.<br><br>National Grid have included only the works that are required to deliver the project within the order limits. These works are limited to what can be justified and in regard to the compulsory acquisition powers sought to deliver the works for the Project, including the undergrounding of U7. However, if these works were to be undertaken by Northern Power Grid out with the DCO and under a voluntary land agreement then there may be a possibility that the extent of the undergrounding could be amended, or extended to address the comments provided in the relevant representation.<br><br>National Grid will seek to have discussions with both parties to discuss the underground route of U7 and how the concerns raised could potentially be addressed. |

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| 25.2 | The access to the works shown from AP40 on the A659 through the High Moor Farm steading has 2 "steps" in it which means it would go through a cattle yard. The first "step" is correct to show the route going round a building but then the line should go straight southeast through the existing gate and straight down the hedge side to the line of the works. It should not take a second "step" which conflicts with the use of the yard as can be seen on the plan. | National Grid thanks the landowner for the feedback and would welcome further discussions on this access track to look further at the proposed route and the route proposed in the Relevant Representation provided. National Grid will seek to further engage with the landowner to reach voluntary agreement on the suggested alternative access route.<br><br>A meeting was held with the landowner's agent on 9 March 2023. The Relevant Representation was discussed as well as updates regarding the project. |

## 2.25 RR-026 [Lister Haigh on behalf of Simon Mills]

Table 2.25 – RR-026 [Lister Haigh on behalf of Simon Mills]

| Response Reference | Relevant Representation Issue | National Grid Response |
|---|---|---|
| 26.1 | The access shown is used by agricultural vehicles and there is a risk of conflict during busy periods such as harvest. | National Grid notes the concern from the Landowner around shared access during busy periods. The proposed access routes have been developed through the non-statutory and statutory consultation process of the Project. National Grid will continue to engage with the Landowner to reduce the impact of these where possible. National Grid will use a Land Officer/Agricultural Liaison Officer (ALO) to provide information and communications to local landowners and those with land-related interests regarding daily construction activities to minimise disruption to agricultural activities, as detailed at **Paragraph 1.3.7 of the Outline Soil Management Plan (Document 5.3.3E) [APP-098]** which is secured by Requirement 5 of the **draft Development Consent Order (Document 3.1(B)) [AS-**011] and is a certified document listed within article 48. The Lands Officer/ALO will ensure access will not be restricted to Landowners during busy periods and normal agricultural activities can continue.<br><br>Where it would not be safe to allow access National Grid is obliged to compensate all owners and occupiers of land taken for temporary possession to carry out the authorised development for any loss or damage arising from the exercise of rights in relation to the land and the obligation is secured under the proposals set out in the **Statement of Reasons (Document 4.1) [APP-069]**. |

## 2.26 RR-027 [National Air Traffic Services Ltd]

Table 2.26 – RR-027 [National Air Traffic Services Ltd]

| Response Reference | Relevant Representation Issue | National Grid Response |
|---|---|---|
| 27.1 | NATS operates no infrastructure in the vicinity of the proposal's area. Accordingly it anticipates no impact from the development and has no comments to make on the Application. | National Grid notes that National Air Traffic Services Ltd anticipates no impact from the development of the Project and has no comments on the Application. |

## 2.27 RR-028 [National Gas Transmission Limited]

Table 2.27 – RR-028 [National Gas Transmission Limited]

| Response Reference | Relevant Representation Issue | National Grid Response |
|---|---|---|
| 28.1 | Relevant Representation of National Gas Transmission Limited (NGT) in respect of the Yorkshire Green DCO (the "Project")<br>This relevant representation is submitted on behalf of National Gas Transmission Ltd ("NGT") in respect of the Project, and in particular NGT's infrastructure and land which is within or in close proximity to the proposed Order Limits.<br>NGT will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus. NGT's rights of access to inspect, maintain, renew and repair such apparatus must also be maintained at all times and access to inspect and maintain such apparatus must not be restricted.<br>Further, where the Applicant intends to acquire land or rights, or interfere with any of NGT's interests in land or NGT's apparatus, NGT will require appropriate protection and further discussion is required on the impact to its apparatus and rights. Further detail is set out below. | National Grid does not intend to remove, alter or affect any apparatus owned by National Gas Transmission Limited (NGT). However, National Grid does recognise the presence of NGT apparatus within the Order limits and the necessity for this to be protected through protective provisions within the DCO.<br><br>On 9 February 2023 National Grid provided NGT detailed plans and details of the proposed work at each of the three locations XD003, XC483 & XC500 with a brief description below. Works include the use of pylon working areas and access tracks, and it is likely to comprise of track matting. National Grid will seek to discuss any protection that may be needed for the assets during construction works.<br><br>National Grid envisage no restricted access to the AGI or impact to NGT assets with the interaction related to the requirement to cross NGT assets with agreed protection mitigation in place.<br><br>National Grid recognise the importance of NGT's access to their apparatus and appropriate provision for this is being negotiated with NGT through discussions on the protective provisions.<br><br>Appropriate protection regarding the use of compulsory acquisition powers over land or rights within which NGT has an interest will be provided for in the protective provisions. |

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| 28.2 | <u>NGT infrastructure within/in close proximity to the proposed Order Limits</u><br>NGT has high pressure gas transmission pipelines and above ground installations ("AGI")] located within or in close proximity to the proposed Order Limits. The transmission pipeline and AGI form an essential part of the gas transmission network in England, Wales and Scotland:<br>• Transmission Pipelines:<br>  ○ Feeder Main 7 Towton to Cawood;<br>  ○ Feeder Main 7 Bardsey to Towton;<br>  ○ Feeder Main 13 Hunsmore to Howton;<br>  ○ Feeder Main 29 Asselby to Pannal.<br>• Above Ground Installations:<br>  ○ Towton AGI Compound | National Grid is aware of the high pressure gas transmission pipelines within the Order limits but, for the avoidance of doubt, is not proposing to remove, add to or divert this pipeline.<br><br>Furthermore, and as set out above, National Grid has provided detailed plans and details of the proposed work at each of the three locations XD003, XC483 & XC500 to NGT with works comprising of pylon working areas, and access tracks crossing assets. National Grid envisage no restricted access to the AGI or impact to NGT assets with the interaction related to the requirement to crossing NGT assets with agreed protection mitigation in place. |
| 28.3 | <u>Protection of NGT Assets</u><br>As a responsible statutory undertaker, NGT's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. As such, NGT has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the draft Order Limits. As noted, NGT's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the Order Limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted.<br>NGT will require protective provisions to be included within the draft Development Consent Order (the "Order") for the Project to ensure that its interests are adequately | Protective provisions for the benefit of gas undertakers (which also includes electricity, water and sewerage undertakers) have been included within the DCO and National Grid will continue to engage with NGT's legal representatives to seek to agree specific protections which are suitable to address NGT's concerns. |

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| | protected and to ensure compliance with relevant safety standards.<br>NGT is liaising with the Applicant in relation to such protective provisions, along with any supplementary agreements which may be required. NGT requests that the Applicant continues to engage with it to provide explanation and reassurances as to how the Applicant's works pursuant to the Order (if made) will ensure protection for those NGT assets which will remain in situ, along with facilitating all future access and other rights as are necessary to allow NGT to properly discharge its statutory obligations.<br>NGT will continue to liaise with the Applicant in this regard with a view to concluding matters as soon as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions. | |
| 28.4 | <u>Compulsory Acquisition Powers in respect of the Project</u><br>As noted, where the Applicant intends to acquire land or rights, or interfere with any of NGT's interests in land, NGT will require further discussion with the Applicant. NGT reserves the right to make further representations as part of the Examination process in relation to specific interactions with its assets but in the meantime will continue to liaise with the Applicant with a view to reaching a satisfactory agreement. | Proportionate and necessary compulsory acquisition powers have been sought within the DCO application. Notwithstanding this, National Grid will continue to engage with NGT to ensure that NGT retain sufficient rights for them to operate and maintain their existing assets or new assets arising from the Project. National Grid is not seeking to acquire any land or new rights over land owned by NGT. |

## 2.28 RR-029 [National Highways]

Table 2.28 – RR-029 [National Highways]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 29.1 | National Highways requests to be an Interested Party on this application. This is because there is potential for the proposals to impact upon the safe and efficient operation of the Strategic Road Network.<br>We have already begun reviewing the application documents and will provide our detailed comments on the application at the examination stage. | National Grid acknowledges National Highways' request to be an Interested Party on the application for the Project and welcomes the opportunity for continued proactive engagement with the teams responsible for asset management of the Strategic Road Network in Yorkshire. National Grid has made reasonable efforts to engage with National Highways to date and a Statement of Common Ground has been prepared between the two parties. This engagement is currently ongoing following receipt of a technical memorandum from National Highways (dated 25/01/2023) requesting clarification of points relating to:<br>• **ES Chapter 3 Description of the Project (Document 5.2.3) [APP-075]** and **Appendix 3F Construction Traffic Management Plan (Document 5.3.3F) [APP-099]**;<br>• **ES Chapter 12 Traffic and Transport (Document 5.2.12) [APP-084]** and **Appendix 12A Traffic Modelling Tables (Document 5.3.12A) [APP-148]**; and<br>• **Traffic Regulation Order Plan Section A to F (Documents 2.12.1 to 2.12.6) [APP-056 to APP-061].**<br><br>National Grid has also engaged with National Highways over the land and rights required that is in National Highways' ownership. Heads of Terms have been issued to National Highways, and they are currently considering their preferred approach to both parties achieving a mutual agreement. |

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| | | National Grid is currently preparing a response to National Highways on the points raised within the technical memorandum in order to provide further clarification on trip calculation methodology and traffic flows at specific locations. Additionally, National Grid also acknowledges National Highways' communication expectations around future discussions relating to various topics including (but not limited to) abnormal loads, traffic management and survey permissions. Continued engagement with National Highways is proposed in order to provide all requested information to a suitable standard and agree details of the points raised through a revised version of the Statement of Common Ground, to be submitted at D1 as **Document 8.5.14**.<br><br>National Grid acknowledges National Highways' stance that any development which generates additional traffic movements, using the Strategic Road Network, has the potential to impact upon its safe and efficient operation. The transport impact assessment area, set out within **ES Chapter 12 Traffic and Transport (Document 5.2.12) [APP-084]** of the application, includes sections of the Strategic Road Network which National Highways is responsible for maintaining. The Guidelines for the Environmental Assessment of Road Traffic (Institute of Environmental Assessment)[4] were used, to inform the transport impact assessment within the **ES Chapter 12 Traffic and Transport (Document 5.2.12) [APP-084]**, to assess the transportation effect of generated construction traffic upon the M1, A1(M) and A64 (between Paradise Lane and A659). All three corridors were identified as being of negligible sensitivity to the transport impact and the construction traffic generated during the peak week (within the build-out programme for these |

[4] Institute of Environmental Assessment (IEA) (1993). Guidelines for the Environmental Assessment of Road Traffic (GEART). IEA; Lincoln, UK.

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| | | links) only resulted in a traffic volume increase on these links which was below the overall assessment threshold. The A64 between Common Lane and Forest Lane was identified as being of medium sensitivity to the transport impacts, however, the experienced percentage increase on this link due to the Project generated construction traffic will be less than 0.1% (total vehicles) and circa 0.2% (Heavy Goods Vehicles) during the peak week of construction traffic (within the build-out programme). The conclusion drawn within **Tables 12.27 and 12.28 of the ES Chapter 12 Traffic and Transport (Document 5.2.12) [APP-084]** is that generated construction traffic will not result in a significant impact upon the Strategic Road Network. |

## 2.29 RR-030 [National Trust]

Table 2.29 – RR-030 [National Trust]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 30.1 | The National Trust wishes to register as an interested party in respect of the application for a Development Consent Order by National Grid for the Yorkshire Green project (Planning Inspectorate reference EN020024).<br>The National Trust owns and manages Beningbrough Hall and gardens extending to 120 hectares which is located approximately 10km northwest of York city centre in the Hambleton District of North Yorkshire. Situated in the countryside, Beningbrough Hall is bounded on two sides by the river Ouse, beyond C18 gate lodges, rolling parkland graced by diverse and mature trees, which surrounds the Baroque mansion and its associated buildings. Beningbrough Hall is a nationally important heritage asset, the exceptional significance of which is recognised in its designation as a Grade I Listed mansion (with other Grade II Listed structures) within a Grade II Registered Park and Garden.<br>The proposed development does not involve National Trust land, nor does it cause direct impacts to arise to the heritage assets. Our concern with the proposal relates to any harm that may arise through a change in the setting of Beningbrough Hall and its parkland.<br>Over the course of 2022 the applicant has engaged positively with National Trust to examine the impacts of the proposal on the setting of the property. We are satisfied with the assessment as presented in document ES Volume 5 Chapter 7 Historic Environment document (EN020024-000256 5.2.7) and the relevant Appendix 7F | National Grid thanks National Trust for their registration of interest regarding the application for a Development Consent Order by National Grid for the Project and the comments provided.<br><br>The National Trust's agreement with the assessment provided in **Section 7.16 of ES Chapter 7 Historic Environment (Document 5.2.7) [APP-079]** and in more detail at **Appendix 7F Technical Note for Beningbrough Hall (Document 5.3.7F) [APP-121]** that no significant harm will arise to Beningbrough Hall and its opinion that no further assessment is required is duly noted. This agreement is captured in the Statement of Common Ground between National Trust and National Grid to be submitted at D1 as **Document 8.5.9**. |

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| | technical note for Beningbrough Hall (EN020024-000146-5.3.7F) together with the visual impact assessed for viewpoint 8 (Table 6H.9 - Viewpoint 8 - Beningbrough Hall and Gardens Figures 6.37 and 6.38, ES Volume 5, Document 5.4.6 (EN020024-000192-5.4.6). The assessment conclusions on the magnitude and significance of the effect of the changes are agreed by National Trust and it is agreed that any harm accruing to the Grade I Beningbrough Hall would arise solely from change to setting during the construction period. This harm would constitute a very low magnitude of less than substantial harm and would occur for a limited duration. No harm would accrue to the registered park and garden, or the other designated heritage assets contained within it.<br><br>A Statement of Common Ground has been drafted by National Grid (draft V1 Jan 2023 with NT additions 26.01.23) which confirms that all matters are agreed between us. As a result, unless the ExA has questions for the National Trust we do not consider it is necessary to play an active role in the DCO process.<br><br>We are comfortable with the limits of deviation identified on plan EN020024-000254-2.6.2 Works Plan section B (sheet 5 of 5). Should the alignment be revised beyond the limits of deviation such that it moves in closer proximity to Beningbrough Hall then we would respectfully request to be consulted to consider and assess any additional impacts that may arise. | |

## 2.30 RR-031 [Natural England]

Table 2.30 – RR-031 [Natural England]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 31.1 | **Part I: Summary and Conclusions of Natural England's advice**<br>Natural England's advice is that, in relation to identified nature conservation issues within its remit, there is no fundamental reason of principle why the project should not be permitted. However, we are currently assessing the wording of the Statement of Common Ground (SoCG) to ensure that we are in full agreement with the contents, and working with National Grid to resolve some minor issues as follows:<br>• Potential licensing requirements for water vole and badger.<br>• Additional detail on Biodiversity Net Gain (BNG)<br>Natural England's advice in these relevant representations is based on information submitted by National Grid in support of its application for a Development Consent Order ('DCO') in relation to Yorkshire GREEN ('the project').<br>Part I of these representations summarises what Natural England considers the main issues to be in relation to the DCO application, and indicate the principal submissions that it wishes to make at this point. Natural England will develop these points further as appropriate during the examination process. It may have further or additional points to make, particularly if further information about the project becomes available. | National Grid welcomes Natural England's confirmation that there is no fundamental reason of principle why the project should not be permitted. National Grid is engaged in discussion with Natural England in relation to a Statement of Common Ground (SoCG). National Grid will continue to positively engage with Natural England throughout the examination in order to resolve any Matters Outstanding within the SoCG, to be submitted at D1 as **Document 8.5.9**.<br><br>In correspondence with National Grid (dated 10 March 2023), Natural England stated that matters relating to water vole and badger are now resolved, as is confirmed through the SoCG submitted at Deadline 1 (**Document 8.5.9**). Therefore, the only outstanding matter is a minor issue relating to Biodiversity Net Gain (BNG). However, as badgers and water voles were also included as matters to be resolved within Natural England's **Relevant Representation [Reference RR-031]**, the following sections of this document set out National Grid's response to all three matters (BNG, water voles and badgers). |

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| | Our comments are set out against the following sub-headings which represent our key areas of remit:<br>• Internationally designated sites<br>• Nationally designated sites<br>• Protected species<br>• Biodiversity net gain<br>• Nationally designated landscapes<br>• Soils and best and most versatile agricultural land<br>Our comments are flagged as amber or green:<br>• Amber are those where further information is required to determine the effects of the project and allow the Examining Authority to properly undertake its task and or advise that further information is required on mitigation/compensation proposals in order to provide a sufficient degree of confidence as to their efficacy.<br>Green are those which have been successfully resolved (subject always to the appropriate requirements being adequately secured) OR where there are no issues or impact pathways.<br>Natural England has been working closely with National Grid to provide advice and guidance since 23 February 2021. This includes pre-application engagement around Protected Species survey approaches, biological survey results, potential impacts on internationally / nationally designated sites, and agriculture and soils. Natural England have recently received a Statement of Common Ground (SoCG) from National Grid, and will continue to work with the applicant to resolve any outstanding issues.<br>Part I of these representations provides an overview of the issues and a summary of Natural England's advice. Section 2 identifies the natural features relevant to this application. Section 3 summarises Natural England's | |

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| | overall view of the application and the main issues which it considers need to be addressed by the Secretary of State.<br>Part II of these representations sets out all the significant issues which remain outstanding, and which Natural England advises should be addressed by National Grid and the Examining Authority as part of the examination process in order to ensure that the project can properly be consented. These are primarily issues on which further information would be required in order to allow the Examining Authority properly to undertake its task or where further work is required to determine the effects of the project and / or to flesh out mitigation proposals to provide a sufficient degree of confidence as to their efficacy.<br>Natural England will continue discussions with National Grid to seek to resolve these concerns and agree outstanding matters in the SoCG. Failing satisfactory agreement, Natural England advises that the matters set out in section 4 will require consideration by the Examining Authority as part of the examination process.<br>The Examining Authority may wish to ensure that the matters set out in these relevant representations are addressed as part of the Examining Authority's first set of questions to ensure the provision of information early in the examination process. | |
| 31.2 | **The natural features potentially affected by this application**<br><u>Internationally designated sites</u><br>Our position regarding impacts on internationally designated sites is summarised below.<br>Natural England is satisfied that the proposal is unlikely to result in adverse effects on the integrity (AEoI) of the following internationally designated sites. | Natural England's agreement that the Project is unlikely to result in adverse effects on the integrity (AEoI) of the Lower Derwent Valley SAC; Lower Derwent Valley SPA; and Lower Derwent Valley Ramsar (as detailed within the **No Significant Effects Report (Habitats Regulations Assessment Screening) (Document 6.4 [APP-200]**), and subsequent Additional Submission **No Significant Effects Report (Habitats Regulations Assessment Screening) (Document** |

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| | • Lower Derwent Valley Special Area of Conservation (SAC)<br>• Lower Derwent Valley Special Protection Area (SPA)<br>• Lower Derwent Valley Ramsar<br>Natural England confirmed agreement of the conclusions of the draft No Significant Effects Report (NSER) on 08 September 2022, and stated that our previous advice in our S42 response still stands. The NSER concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. On the basis of the information provided, Natural England concurs with this view.<br>As there are no impacts anticipated on internationally designated sites ('green'), Natural England do not need to be involved in the examination stages for this aspect. | **6.4(B) [AS-018])**, is noted and welcomed. Natural England's agreement on this matter will be confirmed in the SoCG to be submitted at Deadline 1 (**Document 8.5.9**). |
| 31.3 | <u>Nationally designated sites</u><br>Natural England's position regarding nationally designated sites is summarised below.<br>On the basis of the information submitted in relation to these sites, Natural England is satisfied that the proposal is not likely to damage features of interest of the following nationally designated sites:<br>• Breighton Meadows SSSI<br>• Derwent Ings SSSI<br>• Fairburn and Newton Ings SSSI<br>• Melbourne and Thornton Ings SSSI<br>• Newton Mask SSSI<br>• Stutton Ings SSSI<br>• Sherburn Willows SSSI | Natural England's agreement that no impacts are anticipated on nationally designated sites is noted. All nationally designated sites have been scoped out of the impact assessment as set out in **Table 8A.1 and Table 8A.2 of Appendix 8A Scoping of Assessment Summary (Document 5.2.8A) [APP-126]**. |

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| | As there are no impacts anticipated on nationally designated sites ('green'), Natural England do not need to be involved in the examination stages for this aspect. | |
| 31.4 | Protected species<br>Natural England's position regarding European Protected Species is summarised below. Further detail on our reasoning for this is given in part II.<br>Natural England has previously provided advice on whether Letters of No Impediment (LoNI) were required at DCO submission for bat species and otter. On the basis of the surveys submitted, and based on the methodology for post-DCO submission surveys (for bat species), we agreed that insufficient evidence was present to trigger any requirement for LoNI for these species ('green').<br>Natural England has not yet provided agreement on whether the project will require licences for the following Protected Species: water vole ('amber') and badger ('amber'). | Natural England's confirmation that Letters of No Impediment (LoNIs) are not required for bat species and otter is noted. A detailed response regarding water vole and badger is provided below. Further correspondence with Natural England (10 March 2023) has confirmed that matters relating to water vole and badger are now resolved, as is confirmed through the SoCG to submitted at Deadline 1 (**Document 8.5.9**). |
| 31.5 | Biodiversity Net Gain<br>Natural England's position regarding provision of biodiversity net gain (BNG) is summarised below. Further detail on our reasoning for this is given in Part II.<br>Natural England welcome proposals to provide BNG within the proposal and do not have any major concerns over the approach detailed in the BNG report (dated November 2022). However, we advise that the next steps and recommendations detailed in Section 4 need to be undertaken and the report updated in accordance with these. Alongside this, we advise that further information regarding the feasibility of achieving and securing a 10% net gain in all identified habitat types (hedgerow, habitat | Natural England's comments regarding the provision of BNG are noted. A detailed response to the points raised is provided below. National Grid looks forward to further discussion regarding the provision of BNG with Natural England and is awaiting Natural England's response to additional information provided via e-mail on 27 March 2023, following which the SoCG (**Document 8.5.9**) will be updated. |

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| | and river) should be provided within the application ('amber'). | |
| 31.6 | Nationally designated landscapes<br>Natural England's position regarding nationally designated landscapes is summarised below.<br>The proposal is not located within or in the vicinity of any nationally designated landscapes ('green'). | National Grid welcomes Natural England's response in respect of this issue. As detailed in **paragraph 6.5.9 of ES Chapter 6: Landscape and Visual (Document 5.2.6) [APP-078]** there are no national landscape designations in the Study Area. |
| 31.7 | Soils and best and most versatile agricultural land<br>Natural England's position regarding soils and the best and most versatile agricultural land is summarised below. Further detail on our reasoning for this is given in Part II.<br>Natural England confirmed agreement with the desk-based methodology for areas of temporary development, and with the survey methodology and spatial extent of ALC surveys in May 2022. Natural England also requested that detailed soil management plans were to be provided for areas subject to detailed soil surveys, and an approach to this has now been confirmed in an Outline Soil Management Plan (SMP) ('green'). | National Grid welcomes Natural England's response; there are no further queries regarding soils and best and most versatile agricultural land. The agreement of these matters is included in the SoCG between National Grid and Natural England submitted at Deadline 1 (**Document 8.5.9**). |
| 31.8 | Natural England's overall conclusions<br>In summary, Natural England is satisfied that the development is not likely to have impacts on internationally designated sites (Special Areas of Conservation, Special Protection Areas and Ramsar sites), nationally designated sites (Sites of Special Scientific Interest), and nationally designated landscapes (Areas of Outstanding Natural Beauty and National Parks). Through pre-application engagement, we have confirmed Letters of No Impediment (LoNI) are not required for bats and otter, and we have provided comments on the post-DCO bat survey methodology. Natural England is also satisfied with the overall | Natural England's overall conclusion is noted. Additional detail regarding water vole and badger licensing, and BNG are provided in responses 31.12, 31.13 and 31.16 below. Further correspondence with Natural England (10 March 2023) has confirmed that matters relating to water vole and badger are now resolved, as is confirmed through the SoCG submitted at Deadline 1 (**Document 8.5.9).** National Grid looks forward to further discussion regarding the provision of BNG with Natural England and is awaiting Natural England's response to additional information provided via e-mail on 27 March 2023, following which the SoCG (**Document 8.5.9**) will be updated. |

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| | approach relating to soils and best and most versatile agricultural land.<br>The main outstanding issues raised by this application relate to Protected Species and Biodiversity Net Gain (BNG). Further liaison with National Grid is required to obtain further details around BNG, and to determine if licences are required for water vole and badger. | |
| 31.9 | **Part II: Natural England's detailed advice**<br>Part II of these representations expands upon the detail of all the significant issues ('amber' issues) which, in our view remain outstanding and includes our advice on pathways to their resolution where possible. Part II also shows 'green' issues where a resolution has been reached and subject always to the appropriate requirements being adequately secured, OR where there are no issues or impact pathways present.<br>Natural England's advice is that in relation to issues within its remit there is no fundamental reason of principle why the project should not be permitted. However, we are currently working with National Grid to resolve outstanding issues relating to Protected Species licencing and Biodiversity Net Gain (BNG) through a Statement of Common Ground (SoCG).<br>Natural England's headline points are that on the basis of the information submitted:<br>• Natural England is satisfied that the project is unlikely to have a significant impact on the Lower Derwent Valley Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site. This has been assessed in the No Significant Effects Report (Habitats Regulations Assessment Screening) (dated November 2022), and Natural England has previously confirmed agreement with the conclusions of this report. | National Grid welcomes Natural England's confirmation that in relation to issues within its remit there is no fundamental reason of principle why the project should not be permitted. Additional detail regarding water vole and badger licensing, and BNG are provided in responses 31.12, 31.13 and 31.16 below. Further correspondence with Natural England (10 March 2023) has confirmed that matters relating to water vole and badger are now resolved, as is confirmed through the SoCG submitted at Deadline 1 (**Document 8.5.9**). National Grid looks forward to further discussion with Natural England and is awaiting Natural England's response to additional information provided via e-mail on 27 March 2023, following which the SoCG (**Document 8.5.9**) will be updated. |

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| | • Natural England is also satisfied that the project is not likely to damage features of interest of Breighton Meadows Site of Special Scientific Interest (SSSI), Derwent Ings SSSI, Fairburn and Newton Ings SSSI, Melbourne and Thornton Ings SSSI, Newton Mask SSSI, Stutton Ings SSSI and Sherburn Willows SSSI.<br>• Natural England advises that, if approved, the project must be subject to all necessary and appropriate requirements which ensure that unacceptable environmental impacts either do not occur or are sufficiently mitigated.<br>• Natural England's advice is that only relevant matters outstanding relate to potential requirements for Protected Species licencing for badgers and water vole, and some details relating to BNG. This has not been resolved satisfactorily as part of the pre-application process that must be addressed by National Grid and the Examining Authority as part of the examination and consenting process before development consent can be granted. Please refer to Table 1 for further details around these outstanding issues.<br>Natural England will continue engaging with the applicant to seek to resolve outstanding concerns throughout the examination. Natural England advises that the matters indicated as 'amber' will require consideration by the Examining Authority during the examination. | |
| 31.10 | <u>Table 1, NE key issue ref 1: Internationally designated sites</u><br>• Lower Derwent Valley SAC<br>• Lower Derwent Valley SPA<br>• Lower Derwent Valley Ramsar site | Natural England's agreement that the Project is unlikely to result in any significant effects on internationally designated sites is noted and welcomed. Natural England's agreement on this matter will be confirmed in the SoCG that will be submitted at Deadline 1 (**Document 8.5.9**). |

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| | No likely significant effects are anticipated / no impact pathways have been identified for the internationally designated sites listed.<br>'Green' | |
| 31.11 | Table 1, NE key issue ref 2: Nationally designated sites (biodiversity & geodiversity)<br>• Breighton Meadows SSSI<br>• Derwent Ings SSSI<br>• Fairburn and Newton Ings SSSI<br>• Melbourne and Thornton Ings SSSI<br>• Newton Mask SSSI<br>• Stutton Ings SSSI<br>• Sherburn Willows SSSI<br>No damage to features of interest are anticipated / no impact pathways have been identified for the nationally designated sites listed.<br>'Green' | Natural England's agreement that the Project is unlikely to result in damage to features of interest of nationally designated sites is noted and welcomed. Natural England's agreement on this matter will be confirmed in the SoCG that will be submitted at Deadline 1 (**Document 8.5.9**). |
| 31.12 | Table 1, NE key issue ref 3: Protected Species: Badger<br>Natural England has not yet provided any agreement on whether a badger licence is required. This will be determined in due course through further liaison with National Grid. National Grid do not believe that a protected species licence is required, based on the following information as stated in the draft SoCG:<br>"Evidence of badger setts and badger activity has been recorded within the Order limits.<br>However, the Project has embedded environmental measures to avoid significant effects on badgers (which would also negate the risk of potential breaches of legislation) on badgers. | It is noted that Natural England marked the potential requirement for a badger licence as 'amber' within its **Relevant Representation [Reference RR-031].** In subsequent correspondence with National Grid (dated 10 March 2023)**,** Natural England stated that matters relating to badger are now resolved, as is confirmed through the SoCG submitted at Deadline 1 (**Document 8.5.9**). However, as badgers were included as a matter to be resolved within Natural England's **Relevant Representation [Reference RR-031],** this section of this document (response 31.12) sets out National Grid's response regarding badgers.<br><br>National Grid does not consider a protected species licence for badger is required as the Project would not result in any direct |

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| | Therefore, a specific protected species licence is not required.<br>This position will be reviewed if pre-construction checks indicate that the proposed embedded environmental measures cannot sufficiently avoid negative effects on badgers.<br>It is National Grid's view that the approach is robust. National Grid will continue to liaise with Natural England to finalise agreement."<br>'Amber' | impacts to setts, and the risk of disturbance to badgers whilst occupying their setts would be negated by embedded environmental measures as explained in **paragraphs 8.9.157-8.9.160 of ES Chapter 8 Biodiversity (Document 5.2.8) [APP-080]**. Embedded environmental measures of relevance to badgers are listed on **page 64 of Appendix 3A Embedded Measures Schedule (Document 5.3.3A) [APP-094]** and would be delivered via the implantation of the Biodiversity Mitigation Strategy as submitted in **Appendix 3D Biodiversity Mitigation Strategy (Document 5.3.3D) [APP-097]** secured by **Requirement 5(2)(c) of the draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br>Furthermore, as described in **paragraph 8.9.159 of ES Chapter 8 Biodiversity (Document 5.2.8) [APP-080]** which references Natural England's publication *Interpretation of 'Disturbance' in relation to badgers occupying a sett* (2009), badgers are widespread and common and appear tolerant of significant amounts of noise or activity near their setts without appearing to be disturbed. As such there is no potential for a breach in legislation which would necessitate a licence application based on current available evidence. National Grid's position has been informed by the desk study records obtained for the 2km search area as detailed in **Table 3.1 of 8C CONFIDENTIAL Badger Survey Report (Document 5.3.8C) [APP-128]**, and the results of extensive surveys within suitable habitat, the methodology and results of which are detailed in **paragraphs 2.2.1-2.2.7 and Table 3.2 of Appendix 8C CONFIDENTIAL Badger Survey Report (Document 5.3.8C) [APP-128]**. |
| 31.13 | Table 1, NE key issue ref 4: Protected Species: Water vole | It is noted that Natural England marked the potential requirement for a water vole licence as 'amber' within its **Relevant Representation [Reference RR-031].** In subsequent |

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| | Natural England has not yet provided any agreement on whether a water vole licence is required. This will be determined in due course through further liaison with National Grid. National Grid do not believe that a protected species licence is required, based on the following information as stated in the draft SoCG:<br>"As no evidence of water voles was found within the Order Limits, no licence is required. This position will be reviewed if pre-construction checks indicate that the proposed embedded environmental measures cannot sufficiently avoid negative effects on water voles.<br>It is National Grid's view that the approach is robust. National Grid will continue to liaise with Natural England to finalise agreement."<br>'Amber' | correspondence with National Grid (dated 10 March 2023), Natural England stated that matters relating to water vole are now resolved, as is confirmed through the SoCG submitted at Deadline 1. However, as water voles were included as a matter to be resolved within Natural England's **Relevant Representation [Reference RR-031],** this section of this document (response 31.13) sets out National Grid's response regarding water voles.<br><br>National Grid does not consider a protected species licence for water vole is required as no conclusive evidence of water vole has been recorded within the Order Limits or survey buffer (up to 100m from the Order Limits) as stated in **paragraphs 8.5.69-8.5.72 of ES Chapter 8 Biodiversity (Document 5.2.8) [APP-080]**. As such, it is National Grid's view that there is no potential for a breach in legislation which would necessitate a licence application based on current available evidence.<br><br>National Grid's position has been informed by the desk study records obtained for the 2km search area as detailed in **Table 3.1 of Appendix 8D Otter and Water Vole Survey Report (Document 5.3.8D) [APP-129]**, and the results of extensive surveys along suitable watercourses and waterbodies, the methodology and results of which are detailed in **paragraphs 2.2.11-2.2.28 and paragraphs 3.2.14-3.2.15 of Appendix 8D Otter and Water Vole Survey Report (Document 5.3.8D) [APP-129]**. |
| 31.14 | Table 1, NE key issue ref 5: Protected Species: Otter<br>Natural England assessed the updated otter surveys in August 2022 and provided confirmation to National Grid that a LoNI is not required for this species, due to insufficient evidence based on the surveys undertaken. | Natural England's statement that a LoNI is not required for Otter (as confirmed during a meeting held between Natural England and the Applicant on 16 August 2022 referenced in **Table 8.5 Environmental Statement Chapter 8: Biodiversity (Document 5.2.8) [APP-080]**) is noted. |

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| | ‘Green’ | |
| 31.15 | <u>Table 1, NE key issue ref 6: Protected Species: Bat species</u><br>Natural England assessed the updated bat surveys in August 2022 and provided confirmation to National Grid that a LoNI is not required for this species, due to insufficient evidence based on the surveys undertaken.<br>Natural England have also assessed National Grid’s approach to post-DCO submission surveys for bat roosts, and provide the following comments in relation to the approach:<br>• The use of Ground level Preliminary Roost Assessments (PRAs) on the trees to be impacted by the proposed development to determine their suitability to support bats is considered acceptable. It should be noted that there is a level of subjectivity when classifying trees as having either ‘high’ or ‘moderate’ roosting potential. Natural England would recommend that a suitably qualified and experienced ecologist quality controls the classification process to reduce the risk of misclassification.<br>• Tree climbing surveys give a snapshot of bat activity in the survey area / impact area and have a low encounter rate of bats. They should be used in conjunction with a suite of activity surveys to be able to fully understand how bats are using the landscape. Natural England has seen that previously transect surveys and other activity surveys have been used in conjunction with tree climbing as shown from the results discussed in ‘5.2.8 Chapter 8: Biodiversity’ and available in ‘5.3.8H Appendix 8H Bat Survey Report’. Natural England would expect a similar level of survey | Natural England’s statement that a LoNI is not required for bats based on surveys undertaken pre-DCO application submission (as confirmed during a meeting held between Natural England and the Applicant on 16 August 2022 referenced in **Table 8.5 Environmental Statement Chapter 8: Biodiversity (Document 5.2.8) [APP-080]**) is noted. The following comments relate to the separate points raised by Natural England:<br><br><u>Ground Level PRAs and Quality Control</u><br>As detailed in **Appendix 8H Bat Survey Report (Document 5.3.8H) [APP-133],** all bat survey work (which includes the ongoing ground level PRAs on the trees to be impacted by the proposed development) is led by a Principal Ecologist (Natural England Bat Class 1 Licence registration no. 2022-10591-CL17-BAT), who has over eight years’ experience in ecological consultancy and bat surveys. The survey work is technically reviewed by a Technical Director who has over 15 years’ experience in ecological consultancy (NE Bat Class 2 Licence registration no. 2015-15031-CLS-CLS), with surveys assisted by suitably qualified and experienced ecologists which ensures that the quality, consistency and accuracy of the of the bat survey work and PRA classification process is maintained. Please note that it has been noted that the Licence registration number included in **paragraph 2.3.43 of Appendix 8H Bat Survey Report (Document 5.3.8H) [APP-133]** is incorrect; the correct number is provided above and will be formally corrected in the application documents in due course.<br><br><u>Tree Climbing Surveys and Activity Surveys</u><br>As detailed in **Section 2.3 of Appendix 8H Bat Survey Report (Document 5.3.8H) [APP-133]**, a comprehensive suite of bat activity survey work has been conducted across the Order |

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| | effort for the remaining trees to be surveyed (where they have not been covered by the previous activity surveys) and for best practice to be applied as has been done previously.<br>• This data along with the tree climbing data will aid in the assessment of the landscape which will be essential when planning appropriate mitigation i.e., are any key habit areas being bisected, will bats still have access to key habitat corridors, flight lines that have been identified during surveys, foraging areas as well as the roosting resources.<br>• Natural England would welcome the approach of 2:1 ratio for trees with high/moderate potential still having the roosting resource compensated for even without evidence of bats. As well as bat boxes other techniques such as veteranisation of existing negligible trees and standing monoliths could be explored, if feasible. Bat boxes on poles can have varying success and this method should be explored further should it be pursued; it would not be Natural England's preference.<br>• Should there be need for a bat mitigation licence, surveys should follow best practice. Any deviations would require sound ecological justification with the application.<br>'Green' | Limits during 2021 and 2022 comprising four walked transect routes and 14 static monitoring locations. Surveys were focussed on sections of habitat assessed as suitable for bats where impacts were predicted from the Project, such as where habitat loss may impact areas considered suitable for foraging and/or roosting bats or cause habitat severance, impacting potentially important bat flight-lines. The areas of additional trees which are subject to ongoing bat roosting surveys have been assessed with regard to activity survey coverage and it is considered the completed activity surveys provide suitable coverage to inform the assessment and additional activity surveys are therefore not required.<br><br><u>Appropriate Mitigation</u><br>In view of the approach taken to the assessment, the results of ongoing tree surveys would be unlikely to affect the outcome of the assessment for bats because the assessment is based on the inclusion of embedded environmental measures which mitigate for a reasonable worst-case scenario. Embedded environmental measures of relevance to bats are listed on **pages 61-62 of Appendix 3A Embedded Measures Schedule (Document 5.3.3A) [APP-094]** and would be delivered via the implementation of the Biodiversity Mitigation Strategy as submitted in **Appendix 3D Biodiversity Mitigation Strategy (Document 5.3.3D) [APP-097]** secured by **Requirement 5(2)(c) of the draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br><u>Roost Replacement</u><br>Natural England's positive comments regarding the approach of roost replacement at a 2:1 ratio for trees with high/moderate potential even without evidence of bats is noted. As detailed in **Table 8.5 of ES Chapter 8: Biodiversity (Document 5.2.8) [APP-080]**, mitigation bat boxes would be installed at suitable |

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| | | locations (including trees, buildings or free-standing poles as close as practicably possible to the lost roosting feature). Free standing poles are generally only used where there are no other options, with regards to bat box placement within reasonable proximity to the roosting feature being lost. The veteranisation of existing negligible trees and standing monoliths is not considered as part of the application.<br><br>Bat Mitigation Licence<br>Natural England has confirmed that a LoNI is not required for bats based on surveys undertaken pre-DCO application submission. Notwithstanding this, Natural England's comments regarding the approach to surveys should a bat mitigation licence be required (i.e. if evidence of bat roosting is found during ongoing roost surveys or pre-construction surveys) are noted. |
| 31.16 | Table 1, NE key issue ref 7: Biodiversity net gain (BNG)<br>Natural England welcome the commitment to providing BNG and do not have any concerns around the overall approach to BNG, as outlined in the BNG Report (dated November 2022). However, the next steps and recommendations (Section 4) need to be undertaken and the report updated in accordance with these. In particular, 4.1 (Pre-works surveys) and 4.2 (Calculations and Assessments) should be undertaken as early into this process as possible to inform 4.3 (Design and Management), to ensure application of Biodiversity Net Gain Good Practice Principle 1: Apply the Mitigation Hierarchy.<br>The report also concludes that there is a net loss of BNG across all three habitat types identified within the project, including losses of high distinctiveness priority habitat. Whilst the ambition to mitigate for these on-site is noted, | Natural England's positive comments regarding the overall approach to BNG are noted and welcomed. Natural England's agreement on this matter will be confirmed in the SoCG (**Document 8.5.9**) that will be submitted at Deadline 1.<br><br>National Grid confirms that the next steps and recommendations as set out in **Section 4 of the Biodiversity Net Gain Report (Document 7.9) [APP-210]** will be implemented and the report will be updated with revised information as explained further below. As described in **Section 1.1.4** of the report, it is proposed that the BNG assessment is updated at different stages through the project lifecycle i.e. application stage (current report), detailed design stage (when a contractor has been appointed subject to approval of the DCO), and after construction (based on as-built information) to refine and finalise the assessment as further information becomes |

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| | the current modelling relies on offsetting these losses off-site on currently unidentified locations. Therefore, further information regarding the feasibility of achieving and securing a 10% net gain in all identified habitat types (hedgerow, habitat and river) should be provided within the application. This conflicts with the BNG report's recommendation that "an updated BNG calculation using the Biodiversity Metric 3.1 is to be produced reflecting detailed design post-consent."<br>'Amber' | available. National Grid is engaging with Local Authorities to secure BNG via a Section 106 Agreement.<br><br>On the basis that some detail required to inform a final BNG assessment is not yet available for the Project (e.g. detailed design and final habitat condition assessments), the application stage BNG metric calculations presented in the report, are based on a number of precautionary assumptions, and thus provide a reasonable worst-case indication of the deficit in biodiversity units resulting from the Project (which is likely to overstate losses as a precaution) and the amount and type of on and off-site habitat creation required to achieve BNG.<br><br>As set out in **Section 2.5.1** of the report, the net loss across the Project takes into account the proposed on-site habitat creation/enhancement incorporated in the landscape planting. Modelling of various habitat creation scenarios was undertaken based on the worst-case assumption that no further habitat creation/enhancement could occur on-site in addition to that already included. **Sections 2.5.2 and 2.5.5.** state that this is a high-level estimate, the process of designing BNG would explore both on- and off-site options and that the mechanism for delivering BNG is yet to be defined.<br><br>The information set out in the application stage BNG report is used to inform ongoing discussions regarding the adherence to the BNG Good Practice Principles (see **Appendix A** of the report), influencing design by applying the mitigation hierarchy, and exploring potential locations and the mechanism for delivering BNG both on and off-site. National Grid is committed to achieve the target 10% BNG by firstly applying the mitigation hierarchy in the design process and by exploring both on- and off-site options to achieve BNG that deliver the best outcomes for biodiversity in efficient and effective ways. |

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| | | The pre-works surveys for the remaining areas set out in **Section 4.1** cannot commence due to current access refusal by the landowners. However, if consent is granted, the surveys will commence as soon as seasonality permits (April-September weather depending). Condition assessments of the areas where access is possible are proposed to commence once detailed design information is available to enable the survey effort to be focused on areas directly affected by the Project. The results will then feed into updated calculations and assessment set out **Section 4.2** and will inform discussions with regards to finalising detailed design as detailed in **Section 4.3**. Detailed design will be progressed once a Main Works Contractor is procured with the detailed design not being finalised until after the decision on the Application. |
| 31.17 | Table 1, NE key issue ref 8: Nationally designated landscapes<br>The proposal is not located within or in the vicinity of any nationally designated landscapes.<br>'Green' | National Grid welcomes Natural England's response in respect of this issue. As detailed in **paragraph 6.5.9 of ES Chapter 6: Landscape and Visual (Document 5.2.6) [APP-078]** there are no national landscape designations in the Study Area. |
| 31.18 | Table 1, NE key issue ref 9: Soils and Best and Most Versatile Agricultural Land<br>Natural England confirmed agreement with the desk-based methodology for areas of temporary development, and with the survey methodology and spatial extent of ALC surveys (as detailed in Table 11.5 and Section 11.3, Chapter 11: Agriculture and Soils, Document 5.2.11, Volume 5), in May 2022.<br>Natural England requested that detailed soil management plans were to be provided for areas subject to detailed soil surveys (as detailed in the annexes to Document 5.3.3E, Volume 5), in March 2022. National | National Grid welcomes Natural England's response; there are no further queries regarding soils and best and most versatile agricultural land. The agreement of these matters is to be included in the SoCG between National Grid and Natural England (**Document 8.5.9**). |

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| | Grid have now submitted an Outline Soil Management Plan (SMP) (Document 5.3.3E ES Chapter 3 Appendix 3E), which states in Section 1.1.2 that: “The Outline SMP will be revised (to the Detailed Soil and Aftercare Management Plan) prior to commencement of construction operations and will be informed by information provided through the detailed pre-construction soil surveys secured through DCO requirement 6”. Natural England can confirm agreement with this approach.<br>‘Green’ | |

## 2.31 RR-033 [Paul Swales]

Table 2.31 – RR-033 [Paul Swales]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 33.1 | I own land with five of the pylons that are involved with the green project on it | This is noted by National Grid. |
| 33.2 | The scheme will disrupt my work for several years The payments offered do not recompense for the damage to my land and crops or the disruption to my daily working life. | National Grid offered voluntary terms to the Landowner for the permanent rights required for the Project on the 25 August 2022. National Grid has been in dialogue with the Landowner with regard to them appointing an agent and is looking to set up a meeting to discuss the terms offered.<br><br>The voluntary terms take into account the permanent and temporary rights required for the Project. National Grid is obliged to compensate all owners and occupiers of land taken for temporary possession to carry out the authorised development for any loss or damage arising from the exercise of rights in relation to the land and the obligation is secured via **Article 36(7) of the Draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br><u>Damage to Land</u><br>National Grid will ensure that all works are undertaken in accordance with **Appendix 3B Code of Construction Practice (CoCP) (Document 5.3.3B) [APP-095]**. **Table 3.7** of the CoCP sets out the proposed Good Construction Practice Measures relating to Agriculture and Soils and this has been prepared having regard to the DEFRA (2011) Code of Practice |

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| | | for the Sustainable Use of Soils on Construction Sites[5]. To ensure minimised site damage and disturbance and to monitor compliance with the CoCP National Grid will use an Lands Officer/Agricultural Liaison Officer (ALO) to monitor and minimise disruption for the agricultural activities through daily updates to the Landowner and/ or Tenant. National Grid has undertaken an assessment of the likely significant effects of the Project on agriculture and soils within **paragraphs 11.9.20 and 11.9.21 of ES Chapter 11 Agriculture and Soils (Document 5.2.11) [APP-083]**. Paragraphs set out how National Grid will manage soils excavated for both temporary and permanent works. Following the construction phase of the Project National Grid will adhere to **ES Chapter 3 Appendix 3E (Document 5.3.3E) [APP-098]** to ensure the appropriate soil restoration measures and undertaken. The soil reinstatement will be concluded as per **paragraph 1.7.62 of ES Chapter 3 Appendix 3E (Document 5.3.3E0 [APP-098]**. The soil will be assessed on a location-by-location basis depending on the soil survey data.<br><br><u>Disruption to Daily Working Life</u><br>As with any project of this size and scale, unfortunately some disruption to normal agricultural activities will be inevitable. The appointment of the Lands Officer/ALO referred to above will mitigate as far as possible any such disruption. Any disturbance that results in additional time taken to liaise with National Grid, its contractors or additional time taken to undertake normal agricultural activities on the land will be compensable by National Grid. |

[5] DEFRA (2009). Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Online) Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69308/pb13298- code-of-practice-090910.pdf (Accessed 10 March 2023).

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| 33.3 | There is a constant flow of people needing to be on my land to check conditions or survey. Gateways to my land are constantly left open allowing trespassers into my crops with vehicles at night which is very distressing. | National Grid notes the Landowner's comments around the level of surveys that have taken place to date and the etiquette of the surveyors. This has been fed back to the survey teams. Future surveys will be closely managed by National Grid. National Grid will observe paragraph 2.3 General Site Management of **Appendix 3B Code of Construction Practice (Document 5.3.3B) [APP-095]** and will continue to engage with the Landowner to continue a positive relationship going forward. |

## 2.32 RR-035 [The British Horse Society]

Table 2.32 – RR-035 [The British Horse Society]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 35.1 | Following our initial response to the consultation we would like the secretary of state to take into account our concerns. | National Grid acknowledges that The British Horse Society request to be an Interested Party to the DCO application and welcomes the opportunity for continued engagement with representatives of the organisation. |
| 35.2 | The rights of way statuses are not differentiated between in the plans of the Proposed National Grid (Yorkshire Green Enablement Project) We would therefore like to see bridleways shown as bridleways not simply rights of way in this document. | The **Access Rights of Way and Public Rights of Navigation Plans Sections A to F (Documents 2.7.1 to 2.7.5) [APP-026 to APP-031]** will be amended so that the reader can differentiate between the different types of Public Rights of Way shown on the plans and submitted at Deadline 2.<br><br>The plans within **ES Chapter 12 Traffic and Transport Figures (Document 5.4.12) [APP-188]** were prepared to identify all Public Rights of Way (PRoWs) affected by the project in a graphical format, however, they are merely intended to be supplementary to the detailed descriptions of each route affected, which are provided within **Appendix 3G Public Rights of Way Management Plan (Document 5.3.3G) [APP-100]** where:<br>• **Table 2.1** sets out details of the PROWs affected during the construction period;<br>• **Table 3.1** details the specific form of mitigation proposed;<br>• **Section 3.1** establishes the different types of management measures proposed and provides a |

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| | | detailed description of proposed active management protocols and what will be involved.<br><br>**Appendix 3G Public Rights of Way Management Plan (Document 5.3.3G) [APP-100]** correctly classifies the status of each affected PROW and provides full details of the 15 bridleways affected (a brief summary of each is provided below, with full details in the Public Rights of Way Management Plan), including how they may potentially be impacted during the construction phase (including dismantling/reconducting of overhead lines and interaction with construction accesses/routes). |
| 35.3 | This status very much affects the way in which we and the public at large would respond. Particularly with a temporary closure or stopping up. It is more difficult to find an alternative route on a horse when coming across an unexpected bridleway closure, we would therefore seek assurances that any bridleway closures must include diversions be they temporary or permanent. | National Grid does acknowledge that the status of a route is an important consideration and particularly in relation to temporary closures or stopping up. The complexity involved in sourcing alternative routes that are suitable for horses in the event of unexpected bridleway closures has been considered (as has the importance of restricted-byway and byway routes used by horse drawn vehicles, although none are affected by the project) and the appropriateness of temporary/permanent diversions is considered, as demonstrated below.<br>• **Bridleway 35.59/13/1**: will be crossed by an overhead line to be reconductored and would be managed with a short temporary closure and active management with advanced warning in place This is outlined in **Table 2.1 and 3.1, paragraphs 3.1.9-3.1.11 and Section 3.2 of Appendix 3G Public Rights of Way Management Plan (Document 5.3.3G) [APP-100]**. It has been noted that bridleway ID number included in **Table 2.1 and Table 3.1** of that document and **Figure 12.4 of ES Chapter 12 Traffic and Transport Figures (Document 5.4.12) [APP-188]** is incorrect; the correct number is provided |

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| | | above and will be formally corrected in the application documents in due course.<br>• **Bridleway 35.4/1/1**: will be crossed by an overhead line to be reconductored and runs alongside a proposed access route. It would be managed with a short temporary closure and active management with advanced warning in place and active management of the shared route between users and construction traffic. This is outlined in **Table 2.1 and 3.1, and Section 3.3 of Appendix 3G Public Rights of Way Management Plan (Document 5.3.3G) [APP-100]**.<br>• **Bridleway 35.44/4/1**: will be crossed by an overhead line to be reconductored and runs along a proposed access route. It would be managed with short temporary closures and active management with advanced warning in place This is outlined in **Table 2.1 and 3.1, paragraphs 3.1.9-3.1.11 and Section 3.2 of Appendix 3G Public Rights of Way Management Plan (Document 5.3.3G) [APP-100]**.<br>• **Bridleway 35.44/1/2**: runs along a proposed access route which would have signage to alert bridleway users of construction traffic (**Table 2.1 and 3.1 and Section 3.2 of Appendix 3G Public Rights of Way Management Plan (Document 5.3.3G) [APP-100]**).<br>• **Bridleway 35.63/6/3**: will be crossed by an overhead line to be reconductored and is crossed by an access track. It would be managed with short temporary closures and active management with advanced warning in place. This is outlined in **Table 2.1 and 3.1, paragraphs 3.1.9-3.1.11 and Section 3.2 of Appendix 3G Public Rights of Way Management Plan (Document 5.3.3G) [APP-100]**.<br>• **Bridleway 35.64/13/3**: will be crossed by an overhead line to be reconductored and runs along a proposed |

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| | | access route. It would be managed with short temporary closures and active management with advanced warning in place. This is outlined in **Table 2.1 and 3.1, paragraphs 3.1.9-3.1.11 and Section 3.2 of Appendix 3G Public Rights of Way Management Plan (Document 5.3.3G) [APP-100]**.<br>• **Bridleway 35.64/13/2**: will be crossed by an overhead line to be reconductored, runs along a proposed access route and meets the highway at a construction access point. It would be managed with short temporary closures and active management with advanced warning in place. This is outlined in **Table 2.1 and 3.1, paragraphs 3.1.9-3.1.11 and Section 3.2 of Appendix 3G Public Rights of Way Management Plan (Document 5.3.3G) [APP-100]**.<br>• **Bridleway 35.33/1/1**: will be crossed by an overhead line to be reconductored and runs along a proposed access route. It would be managed with a short temporary closure and active management with advanced warning in place. This is outlined in **Table 2.1 and 3.1, paragraphs 3.1.9-3.1.11 and Section 3.2 of Appendix 3G Public Rights of Way Management Plan (Document 5.3.3G) [APP-100].**<br>• **Bridleway 35.33/1/2**: runs along a proposed access route and meets the highway at a construction access point which would have signage to alert bridleway users of construction traffic (**Table 2.1 and 3.1 and Section 3.2 of Appendix 3G Public Rights of Way Management Plan (Document 5.3.3G) [APP-100]**).<br>• **Bridleway 15.95/2/3**: will be crossed by an overhead line to be dismantled, runs along a proposed access route and is crossed by a proposed access route. It would be managed with short temporary closures and active management with advanced warning in place. This is outlined in **Table 2.1 and 3.1, paragraphs 3.1.9-** |

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| | | **3.1.11 and Section 3.2 of Appendix 3G Public Rights of Way Management Plan (Document 5.3.3G) [APP-100]**.<br>• **Bridleway 15.95/5/3**: runs along a proposed access route and meets the highway at a construction access point which would have signage to alert bridleway users of construction traffic (**Table 2.1 and 3.1 and Section 3.2 of Appendix 3G Public Rights of Way Management Plan (Document 5.3.3G) [APP-100]**). It has been noted that bridleway ID number included in **Table 2.1** of that document is incorrect; the correct number is provided above and will be formally corrected in the application documents in due course.<br>• **Bridleway 15.95/5/2**: will be crossed by an overhead line to be dismantled and constructed and runs along a proposed access route. It would be managed with short temporary closures and active management with advanced warning in place. This is outlined in **Table 2.1 and 3.1, paragraphs 3.1.9-3.1.11 and Section 3.2 of Appendix 3G Public Rights of Way Management Plan (Document 5.3.3G) [APP-100]**.<br>• **Bridleway 10/03/20**: will be crossed by an overhead line to be dismantled and constructed and runs along a proposed access route. It would be managed with short temporary closures and active management with advanced warning in place. This is outlined in **Table 2.1 and 3.1, paragraphs 3.1.9-3.1.11 and Section 3.2 of Appendix 3G Public Rights of Way Management Plan (Document 5.3.3G) [APP-100]**.<br>• **Bridleway 35.44/1/1**: runs along a proposed access route and would have signage to alert bridleway users of construction traffic (**Table 2.1 and 3.1 and Section 3.2 of Appendix 3G Public Rights of Way Management Plan (Document 5.3.3G) [APP-100]**). |

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| | | • **Bridleway 35.33/6/7**: runs along a proposed access route and would have signage to alert bridleway users of construction traffic (**Table 2.1 and 3.1 and Section 3.2 of Appendix 3G Public Rights of Way Management Plan (Document 5.3.3G) [APP-100]**). It has been noted that bridleway ID number included in **Table 2.1** of that document and **Figure 12.4 of ES Chapter 12 Traffic and Transport Figures (Document 5.4.12) [APP-188]** is incorrect; the correct number is provided above and will be formally corrected in the application documents in due course.<br><br>In summary, it is considered that five of the impacted bridleways (35.44/1/2; 35.33/1/1; 15.95/5/3; 35.44/1/1 and 35.33/6/7) will not require temporary/permanent closures and it is proposed that they will be managed through appropriate signage schemes.<br><br>Equitable diversion routes are unfortunately not available at the remaining ten bridleways that will require temporary closure and, as such, it is proposed that active management will be adopted as an appropriate alternative approach. Trained contract staff will be employed to temporarily stop users for a short period of time (typically only a matter of minutes) in the event that vehicle movements or construction activities are occurring. Where possible it is proposed that contract staff will make best endeavours to pause construction activities in order to allow equestrians to continue their journey with minimum disruption. Appropriate signage providing advanced warning of the requirement for active management measures (which will be agreed with the Rights of Way Officers at the Local Authority before being subject to bespoke risk assessments undertaken by the Principal Contractor) will be provided for the benefit of all users along these routes. It is also proposed that additional management will be adopted on bridleway 35.4/1/1 which is a |

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| | | 'shared route', in order to provide instruction to drivers on safe speeds to pass pedestrians and horses, speed limits and other related measures.<br><br>In view of the low number of bridleways affected and the short duration of time that equestrians could be stopped by trained contract staff, it is considered appropriate to propose active management of existing routes rather than physical diversions (which would potentially involve greater inconvenience to users than the alternative approach). |

## 2.33 RR-036 [The Woodland Trust]

Table 2.33 – RR-036 [The Woodland Trust]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 36.1 | Thank you for the opportunity to register as an interested party on this development. The Woodland Trust holds concerns regarding the likely impact of the proposed scheme on ancient woods and trees within proximity to the development corridor, and would welcome the ability to scrutinise the plans as part of the examination process. | Introduction<br>National Grid has assessed the likely impact of the Project on ancient woodland and trees in **ES Chapter 8: Biodiversity (Document 5.2.8) [APP-080]** and **Section 1.9.15-1.9.28** of **Appendix 3I: Arboricultural Impact Assessment (Document 5.3.3I) [APP-102]**. Further information is provided on **the Tree and Hedgerows Potentially Affected Plans Sections A to F(Document 2.11.1 to 2.11.6) [APP-050 to APP-055].**<br><br>As concluded in **paragraph 8.9.37 of ES Chapter 8: Biodiversity (Document 5.2.8) [APP-080]**, the magnitude of change on ancient and semi-natural woodland or ancient replanted woodland and ancient or veteran trees due to the Project would be negligible resulting in no significant effects.<br><br>Embedded environmental measures of relevance to these features are listed on **page 61 of Appendix 3A Embedded Measures Schedule (Document 5.3.3A) [APP-094]** and would be delivered via the implementation of the Biodiversity Mitigation Strategy as submitted in **Appendix 3D Biodiversity Mitigation Strategy (Document 5.3.3D) [APP-097]** secured by **Requirement 5(2)(c) of the draft Development Consent Order (Document 3.1(B)) [AS-011]**.<br><br>Tree protection (including ancient woodland, veteran and ancient trees) will be delivered via the Tree and Hedgerow Protection Strategy secured via **Requirement 6(1)(g) and** |

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| | | **Requirement 10(1) of the draft Development Consent Order (DCO) (Document 3.1B)) [AS-011]**.<br><br>Baseline Data (Overview)<br>**Paragraph 1.5.14-14.5.22 of the Arboricultural Impact Assessment (Document 5.3.3I) [APP-102]** considers the baseline for ancient woodland and ancient or veteran trees.<br><br>Ancient Woodland Baseline<br>All ancient woodlands have been mapped via the Ancient Woodland Inventory/MagicMap (published by Natural England) and a minimum 15m buffer zone applied in accordance with standing advice from Natural England and the Forestry Commission (2022). Only a small section (<0.01ha) of one ancient woodland (Huddleston Old Wood) is located within the Order Limits.<br><br>Site walkovers have been undertaken by qualified ecologists and no unrecorded ancient woodlands (e.g., those smaller than 2ha) have been identified.<br><br>Ancient or Veteran Tree Baseline<br>Following a desk top study, no ancient or veteran trees identified on the Ancient Tree Inventory mapping are within the Order Limits. Four trees (identified in **Table 1.9 of the Arboricultural Impact Assessment (Document 5.3.3I) [APP-102]**) are in proximity to the Order Limits but are set back to the extent that they are not at risk of impact from works within the Order Limits (this comprises two veteran trees and two notable trees).<br><br>A comprehensive tree survey has been carried out by suitably qualified and experienced arboriculturists to *BS5837:2012* |

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| | | *Trees in relation to design, demolition and construction. Recommendations* for all key areas of the Project and 67 veteran or ancient trees have been identified.<br><br>Of these, nine are considered to be potentially ancient due to their girth for the species. Only 12 of the 67 veteran or ancient trees identified (two ancient and ten veteran trees) are located within the Order Limits boundary.<br><br>Buffer zones/increased Root Protection Areas equivalent to a radius of 15 x stem diameter (at a height of 1.5m) or canopy spread +5m (whichever is greater) have been applied to all veteran or ancient trees.<br><br>All veteran or ancient trees are clearly marked on the **Tree Constraints Plans included as Annex 3I.1 of the Arboricultural Impact Assessment (Document 5.3.3I) [APP-103]** and the **Tree Removal and Protection Plans included as Annex 3I.3 of the Arboricultural Impact Assessment (Document 5.3.3I) [APP-104]** with an orange star symbol. Ancient woodlands are also clearly marked on both sets of plans with a dark green hatch with the 15m buffer zone drawn as an outer green line. These elements are clearly labelled on the drawing keys.<br><br><u>Design Development to Avoid or Minimise Impacts</u><br>The design has been developed to accord with national and local planning policy as summarised in **Table 1.2 of the Arboricultural Impact Assessment (Document 5.3.3I) [APP-102]** and avoids any loss or detrimental impact to irreplaceable habitat features. |

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| | | From the outset of the Project this has comprised using or adapting existing electricity infrastructure and selecting shorter overhead line routes in order to minimise environmental impacts (see **Section 4.3 of the Strategic Proposal 2019 (Document 7.5) [APP-206]** and **paragraph 2.1.7 of the Corridor and Preliminary Routeing and Siting Report (Document 7.8) [APP-209]**) in line with National Grid's statutory duty under Schedule 9 of the Electricity Act 1989 to 'have regard to the desirability of preserving amenity'. Avoiding the location of ancient woodland and other areas of woodland was one of the mitigation measures taken into account in identifying potential overhead line route corridors and Cable Sealing End Compound and substation siting areas for new infrastructure (see **Table 2.2 of the Corridor and Preliminary Routeing and Siting Report (Document 7.8**) **[APP-209]).** The selected preferred route corridor avoided all areas of ancient woodland. There were several scattered woodlands in the Corridor but it was considered that these could be easily avoided with careful routing of the overhead line (see **Table 4.6 of the Corridor and Preliminary Routeing and Siting Report (Document 7.8) [APP-209]**)**.** The preferred siting areas avoided ancient woodland.<br><br>Comprehensive design amendments were then undertaken in line with National Grid's Design Change Control process (outlined in **Section 2.7 of ES Chapter 2 Project Need and Alternatives (Document 5.2.2) [APP-074]**) taking into account the results from tree surveys.<br><br>As a result, amendments were made (or not made) as follows to avoid effects on veteran or ancient trees:<br>• Amendments to the pylon (YN004, YN005) locations along the proposed YN overhead line (see **paragraph 2.8.8 of ES Chapter 2 Project Need and Alternatives** (**Document 5.2.2) [APP-074]**) to avoid effects on |

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| | | veteran trees. Changes in response to stakeholder feedback in relation to the location of pylon YN006 were not implemented due to a range of factors including the potential loss of veteran trees (see **paragraph 2.8.10 of ES Chapter 2 Project Need and Alternatives (Document 5.2.2) [APP-074]**).<br>• Potential movement of Overton Substation to the north of the A19 (as a result of stakeholder feedback): This change was not made partly because it could result in the loss of a veteran tree (see **paragraph 2.8.13 of ES Chapter 2 Project Need and Alternatives (Document 5.2.2) [APP-074]**).<br>• Potential realignment of the XC overhead line south-west of Overton Substation: Stakeholder feedback outlined a number of changes to this overhead line and two potential options were considered. Option 1 was not taken forward partly because it would have increased potential effects on Overton Wood ancient woodland and veteran trees (see **paragraph 2.8.20 of ES Chapter 2 Project Need and Alternatives (Document 5.2.2) [APP-074]**).<br>• Existing XC overhead line works: Changes were made to the scaffolding design to avoid effects on Huddleston Old Wood ancient woodland as well as other areas of mature woodland and veteran trees (see **paragraph 2.8.23 of ES Chapter 2 Project Need and Alternatives (Document 5.2.2) [APP-074]**).<br><br>As outlined in **paragraph 2.8.41 of ES Chapter 2 Project Need and Alternatives, (Document 5.2.2) [APP-074]**, a number of design refinements were also made to ensure a 15m buffer would be in place between Overton ancient woodland and the Order Limits and to alter the alignment of access routes, reduce the extent of working area or structing areas, |

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| | | amending the Order Limits or Limits of Deviation to avoid effects on high quality and veteran trees.<br><br>Ancient Woodland Impacts<br>All areas of ancient woodland and the associated buffer zone are avoided with the exception of a small section of Huddleston Old Wood (Plantation Ancient Woodland Site or PAWS). This area is illustrated on **Sheet 20 of the Tree Removal and Protection Plan included as Annex 3I.3 of the Arboricultural Impact Assessment (Document 5.3.3I) [APP-104]**. It is also shown on **Sheet 5 of 7 of the Trees and Hedgerows Potentially Affected Plan Section E (Document 2.11.5) [APP-054]**. Scaffolding and an access route to facilitate reconductoring work are required outside of the recorded boundary of the woodland but potentially within the 15m minimum buffer. The alignment is restricted here due to the position of the existing overhead line, and scaffolding (which is required to facilitate the rail crossing) and the access route may not be able to be repositioned to completely avoid the buffer zone.<br><br>In practice the scaffolding and access route will be achieved with the minimum impact to adjacent trees feasible and will be erected and installed working around tree positions where possible.<br><br>Ground protection mats will be utilised where scaffolding access within the Root Protection Area (RPA) of a retained tree or the 15m ancient woodland buffer is unavoidable, to protect soil structure. No excavation or ground level changes will be permitted. This will ensure that the critical characteristics of the ancient woodland (e.g. undisturbed soil) and the buffer zone will not be impacted. The specification for ground protection will be developed as part of the Tree and Hedgerow Protection |

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| | | Strategy (secured via **Requirement 6(1)(g) and Requirement 10(1) of the draft Development Consent Order (DCO) (Document 3.1(B)) [AS-011]**. This will be submitted to and approved by the relevant planning authority in advance.<br><br>Where trees must be cleared to facilitate scaffolding outside of the ancient woodland but within the 15m buffer zone they will preferentially be pollarded or coppiced and allowed to regenerate following the completion of reconductoring works. The specification for tree works will be developed as part of the Tree and Hedgerow Protection Strategy (secured via **Requirement 6 (1)(g) and Requirement 10 (1) of the draft Development Consent Order (DCO) (Document 3.1(B)) [AS-011]**. This will be submitted to and approved by the relevant planning authority in advance.<br><br>A maximum clearance area of circa 192m$^2$ (0.0192ha) is required from the buffer zone (the total area of the recorded woodland is 38.20ha and the section of woodland within the Order Limits is <0.01 ha). Trees in this location are young to semi mature hawthorn, ash and hazel and will therefore be tolerant of pruning or coppicing which will also allow the longer-term retention of the woodland edge habitat and will help to promote a mosaic of woodland structure with benefits for biodiversity.<br><br>Coppicing is an integral part of woodland management and has formed an important element of the management of woodlands including ancient woodlands in the UK for hundreds of years.<br><br>Where trees in the 15m buffer zone cannot be coppiced to facilitate scaffolding or the access route, they will be felled to ground level. The methodology to minimise stump removal and ground disturbance will be developed as part of the Tree and |

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| | | Hedgerow Protection Strategy (secured via **Requirement 6(1)(g) and Requirement 10(1) of the draft Development Consent Order (DCO) (Document 3.1(B)) [AS-011]**. This will be submitted to and approved by the relevant planning authority in advance.<br><br><u>Veteran or Ancient Tree Impacts</u><br>Six veteran and one potentially ancient tree (ash T927 – considered to be potentially ancient due to its large girth for the species (see **Sheet 5 of the Tree Removal and Protection Plan, Annex 3I.3 of the Arboricultural Impact Assessment (Document 5.3.3I) [APP-104]**) are potentially impacted by access routes which utilise existing roads or tracks. National Grid has committed to develop an alternative route that would avoid the amended Root Protection Area (RPA) of the tree/s where there would be a change to the existing use of an existing access route (e.g. an increase in width, loaded weight, intensity of use or height clearance requirements for example). The Order Limits have been developed to allow this flexibility.<br><br>Two veteran trees may require pruning to maintain existing Overhead Line clearances (known as the 'blowout zone'). This level of pruning is required for the existing management of the overhead line regardless of the Project and therefore these trees are not considered to be subject to a new impact associated with the Project.<br><br>One potentially ancient tree (hawthorn T1858 – considered to potentially be ancient due to its large girth for the species) is directly below an existing overhead line to be reconductored (see **Sheet 11 of the Tree Removal and Protection Plan, Annex 3I.3 of the Arboricultural Impact Assessment (Document 5.3.3I) [APP-104]**). This tree will be protected by reconductoring without dropping the overhead line (winching |

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| | | new cable into position aerially) or, where this is not feasible, via the construction of a scaffold framework to protect the tree when the cable is lowered during reconductoring works.<br><br><u>Summary and Conclusion</u><br>Overall, the Project does not result in the loss of, or detrimental impact to any veteran or ancient trees. The Project also does not result in the loss of any ancient woodland and does not result in any direct impacts to ancient woodland along with no significant or lasting impacts that could be considered to be detrimental to the ancient woodland minimum buffer zone. This accords with national and local planning policy including NPS EN1. |
| 36.2 | The applicants must ensure that appropriate mitigation is in place to protect these irreplaceable habitats from detrimental impact and harm, should development consent be granted. | As described above the design has been developed to avoid detrimental impacts to ancient woodland and veteran or ancient trees. Where such trees or woodland are located close to areas of development activity they will be robustly protected with fencing where possible to restrict access within the buffer zone or Root Protection Area (RPA).<br><br>Outline tree protection measures are considered in **Section 1.10.28-1.10.41 of the Outline Arboricultural Method Statement included as Annex 3I.4 of the Arboricultural Impact Assessment (Document 5.3.3I) [APP-104]**. A Tree and Hedgerow Protection Strategy will be developed to set out the final proposals for tree and hedgerow protection which will be submitted to and approved by the relevant planning authority and this is secured by **Requirement 6(1)(g) and Requirement 10(1) of the draft Development Consent Order (DCO) (Document 3.1(B)) [AS-011]**. |

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| | | Where access is unavoidable and no existing hard surface is in place (sufficient to protect soil structure and roots from damage or compaction) ground protection measures will be installed in advance to protect roots and soil structure.<br><br>Where coppicing or pollarding is required within the 15m ancient woodland buffer zone, trees will be allowed to regenerate following the completion of the works. |

## 2.34 RR-037 [UK Health Security Agency]

Table 2.34 – RR-037 [UK Health Security Agency]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 37.1 | Thank you for your consultation regarding the above development. The UK Health Security Agency (UKHSA) welcomes the opportunity to comment on your proposals at this stage of the project. Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided is sent on behalf of both UKHSA and OHID. We can confirm that: With respect to Registration of Interest documentation, we are reassured that earlier comments raised by us on 7th December 2021 have been addressed. In addition, we acknowledge that the Environmental Statement (ES) has not identified any issues which could significantly affect public health. UKHSA/OHID previously raised concerns with the use of the DMRB LA112 methodology within the Population and Human Health chapter, as it does not include an assessment of significance for those elements scoped in, as required under the EIA Regulations. After reviewing the results of the applicant's assessment, we recognise that in this instance any additional assessment of significance is unlikely to significantly alter the findings. Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health. On that basis, we have no additional comments to make at this stage and can confirm that we have chosen NOT to register an interest with the Planning Inspectorate on this occasion. Please | National Grid notes and thanks the UK Health Security Agency (UKHSA) for their comments. The assessment of potential effects on Health and Wellbeing as presented in **ES Chapter 15 Health and Wellbeing (Document 5.2.15) [APP-087]** was undertaken based on guidance on assessment methodology set out within DMRB Document LA112 – Population and Human Health. This sets out requirements for assessing and reporting the environmental effects on health and wellbeing determinants from construction, operation and maintenance of highways projects. It provided a methodological framework for the assessment of human health effects in respect of other linear infrastructure projects in the absence of more specific guidance for energy infrastructure projects. As the DMRB Document LA112 guidance did not provide a methodology for assessing the significance of outcomes or effects, the potential health effects during construction and operation were identified in the ES using the criteria provided in **Table 15-22 of ES Chapter 15 Health and Wellbeing (Document 5.2.15) [APP-087]**, to determine positive, negative and neutral outcomes. More information on the methodology for the assessment of health and wellbeing effects is provided within **paragraph 15.8.2 of ES Chapter 15 Health and Wellbeing (Document 5.2.15) [APP-087]**.<br><br>Notwithstanding that there was an absence of methodology to determine the significance of effects in respect of health and wellbeing, the assessment of impacts presented in the ES is considered by the Applicant to be robust and appropriate on this basis. |

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| | do not hesitate to contact us if you have any questions or concerns. | |

## 2.35 RR-038 [Weightmans LLP on behalf of NORTHERN POWERGRID (YORKSHIRE) PLC]

Table 2.35 – RR-038 [Weightmans LLP on behalf of NORTHERN POWERGRID (YORKSHIRE) PLC]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 38.1 | Representation for NPG in respect of National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order. The following representations are submitted on behalf of Northern Powergrid (Yorkshire) PLC as an electricity undertaker for the area within which the Yorkshire Green Energy project is located:<br>Northern Powergrid is in principle supportive of the above project but has concerns regarding the impacts the proposed scheme will have on existing assets and their pending improvement works. | National Grid acknowledges the in-principle support from Northern Powergrid (Yorkshire) PLC (NPG) for the Project. National Grid's role in the wholesale market is fundamental to ensuring a reliable and quality supply to all as it enables regional domestic network operators (such as NPG) to supply individual domestic premises and businesses.<br><br>National Grid recognises the impact of the Project on NPG's existing assets and has taken this into account in the drafting of the DCO. For example, NPG is included within the definition of 'undertaker' for the purposes of 'NPG Works', allowing NPG to use the powers of the DCO to implement works to NPG assets or equipment forming part of the authorised development. Additionally, protective provisions for the benefit of electricity, gas, water and sewage undertakers have been included within the DCO and National Grid is engaged with NPG's legal representatives to seek to agree that these protective provisions are adequate for NPG's purposes.<br><br>National Grid has provided information in the requested format to NPG enabling them to carry out a network impact assessment regarding the impacts that the Project will have on NPG's apparatus. A Statement of Common Ground (SoCG) is also being produced between the parties and will be submitted to the Examination at Deadline 1 as **Document 8.5.10**. |

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| 38.2 | Areas shown within the proposed development boundary have a direct impact on Northern Powergrid's existing critical national infrastructure which serve significant numbers of customers in the local and wider area, and the rights for these assets are essential in maintaining an uninterrupted power supply to the customers we serve.<br>The proposed development seeks to interfere with Northern Powergrid's existing 132kV primary substation, pylons, overhead cables, underground cables and access and servicing rights. Each of these are vital for Northern Powergrid's existing operations. The accompanying compulsory purchase order for the development seeks to acquire land and interests which, if acquired, would adversely affect Northern Powergrid's ability to use, access and maintain it's substation. It is not necessary to acquire these interests where an agreement between the parties would be more appropriate. | National Grid acknowledges the nature of NPG's infrastructure and the importance to NPG of retaining rights for these assets. National Grid has included provisions for the protection of this existing infrastructure in the DCO and is engaging with NPG's legal representatives to seek to agree that these protective provisions are adequate for NPG's purposes.<br><br>Proportionate and necessary compulsory acquisition powers have been sought within the DCO application. Notwithstanding this, National Grid is engaged in reaching agreement with NPG for any interaction with their assets which would include NPG retaining sufficient rights to operate and maintain their existing assets or new assets arising from the Project. National Grid is not seeking to acquire any land or new rights over land owned by NPG.<br><br>National Grid have engaged with NPG throughout the design of the Project to ensure that interfaces between the Project and NPG's assets are appropriately addressed. This engagement and agreement will be evidenced in the detailed SoCG, which is also being produced between the parties and will be submitted to the Examination at Deadline 1 as **Document 8.5.10**. |
| 38.3 | In addition to the technical impacts of the proposed development, Northern Powergrid has concerns over the proposed protective provisions contained within the draft order as they do not take into account site specific issues and do not accord with Northern Powergrid's standard protective provision requirements.<br>Northern Powergrid has discussed its concerns with National Grid and the parties are working closely to reduce the project's impacts on Northern Powergrid's apparatus. Northern Powergrid is keen to keep an open | National Grid is engaged with NPG's legal representatives to seek to agree that the protective provisions included within the DCO are adequate for NPG's purposes.<br><br>National Grid has listened to Northern Powergrid concerns, and have accepted alterations in Northern Powergrid proposed designs for the 11kV & 33kV diversions to its network. This has been achieved through early design meetings in which diversions have been combined or altered to align with NPG's policy, with the final stage of quote and acceptance process |

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| | dialogue with National Grid and to engage with the applicant's legal representative to agree appropriate amendments to the protective provisions. | detailed in the SOCG, to be submitted to the Examination at Deadline 1 as **Document 8.5.10**. |

## 2.36 RR-039 [York Georgian Society]

Table 2.36 – RR-039 [York Georgian Society]

| Response Reference | Relevant Representation Issue | National Grid Response |
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| 39.1 | A principal objective of York Georgian Society is to encourage the conservation, restoration and maintenance of Georgian buildings or buildings with Georgian aspects of architectural merit in and around the City of York. | National Grid acknowledges the principle objective of York Georgian Society and notes that it does not hold the specific information as to the location of listed buildings (and other heritage assets) and that this should be obtained from Historic England. |
| 39.2 | We do not possess cartographical information as to the location of such buildings and it is, therefore, difficult to establish whether the proposals would significantly affect any listed building. Information as to the location of listed buildings (and other heritage assets) should be obtainable from Historic England, 37 Tanner Row, York YO1 6WP. We appreciate the need for the proposed upgrading and would only wish to object to the proposals if they have an increased deleterious affect on any listed buildings or their settings | The listed buildings of all dates, including those from the Georgian period, have been assessed in respect of the Project within **Sections 7.9-7.47 of ES Chapter 7 Historic Environment (Document 5.2.7) [APP-079]**. This assessment was carried out in line with the relevant Historic England guidance, *Historic Environment Good Practice Advice in Planning (GPA 3): The Setting of Heritage Assets*[6]. A methodology for the scoping and assessment of heritage assets including any effects on Listed Buildings, which were identified using the National Heritage List for England spatial datasets was agreed through consultation with Historic England and Local Planning Authority Conservation Officers at York City Council, Selby District Council, Hambleton District Council and Harrogate Borough Council. The records of this consultation |

[6] Historic England 2017, Historic Environment Good Practice Advice in Planning (GPA 3): The Setting of Heritage Assets.

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| | | can be found at **Table 7.4 of ES Chapter 7 Historic Environment (Document 5.2.7) [APP-079]**. In addition, detailed plans showing the locations of Listed Buildings can be found within the **Statutory or Non Statutory Sites or Features of the Historic Environment Plan Sections A-F (Document 2.10.1 to 2.10.6) [APP-044 to APP-049]**.<br><br>The assessment found that no Listed Buildings would be significantly affected by the proposed development of the Project. The assessment did find the potential for a very minor change to the setting of the Grade I listed Beningbrough Hall, a Georgian mansion, during the construction period. The assessment of effects on Beningbrough Hall can be found in **Section 7.16 of ES Chapter 7 Historic Environment (Document 5.2.7) [APP-079]** and additionally at **Appendix 7F Technical Note for Beningbrough Hall (Document 5.3.7F) [APP-121]**. This assessment has been agreed with the National Trust and Historic England. This agreement will be recorded in the relevant Statements of Common Ground agreed with Historic England (**Document 8.5.8**) and National Trust (**Document 8.5.9**) submitted at Deadline 1. |