

The Planning Inspectorate

Our ref: RA/2023/145638/01

Your ref: EN020024

Date: 26 April 2023

Dear Sir/Madam

Application by National Grid Electricity Transmission (NGET) for an Order granting Development Consent for the Yorkshire Green Energy Enablement (GREEN) project: Written Representation.

Thank you for consulting the Environment Agency in relation to the above application. Please see below our written representation.

Document 5.2.10 ES Chapter 10: Geology and Hydrogeology

Table 10.3 – Technical guidance relevant to the geology and hydrogeology assessment (page 12)

- We suggest adding the following document to the table - [The Environment Agency's approach to groundwater protection February 2018](#)

Pleased to acknowledge that risks to groundwater have been considered, risk assessed and measures will be put in place to protect the groundwater. Documents also acknowledge that some locations of works are in SPZ's, and Principle Aquifers, and appropriate measures will be taken to protect these.

Our previous comments made during the previous consultation have been answered with the Code of Construction Practice (CoCP) (5.5.3B, Volume 5).

APP-032

Document 2.8.1 Statutory or Non-Statutory Sites or Features of Nature Conservation Plan Section A - No comments

APP-033 - No comments

APP-034 - No comments

APP-035 – No comments

APP-036, very near eastern edge of Huddleston Old Wood, opportunities for implementing Biodiversity Net Gain (BNG)?

App-037 - No comments

APP-210 - 7.9 Biodiversity Net Gain Report

Target:

~94ha of habitat creation of a mix of woodland (high and medium distinctiveness woodland), grassland (high and medium distinctiveness grassland) and ponds; • ~15km of hedgerow creation; and • ~3km of river enhancements.

We have liaised with the applicant to provide suggestions around BNG to address the short fall in river units.

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– 1.4.7: Defra Metric 4.0 is the most recent version.

Page 6

‘A delay in habitat creation/enhancement results in a higher time to target condition multiplier, whereas habitats created/enhanced in advance benefit from a shorter time to target condition. This information is specific to each project’.

It would be good to start planning for and creating the required 10% BNG as soon as the project timescale allows. Rather than on page 30, allowing for a 5-year delay.

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Off-site BNG delivery 2.5.18 – we have liaised with the applicant to submit some suggestions for off-site BNG.

Volume 5 Environmental Impact Assessment Information

APP-080 Chapter 8 – Biodiversity

Table 8.5 – Summary of statutory consultation responses and technical engagement

We have read the section on the comments by the consultees and especially for the Environment Agency. National Grid have satisfactorily addressed these questions from the Agency.

We are happy with the ecological surveys conducted, they have identified all habitats and protected species that may be affected by the project.

8.6 Embedded environmental measures

All potential hazards have been identified and robust mitigation measures have been put in place.

17. Installation of bat boxes: these should be made of woodcrete.

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Nesting birds (including Schedule 1 species)

An ecologist should be on site and oversee any vegetation clearance work in the bird breeding season, rather than checking an area 48 hours before clearance.

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8.9.31

‘In practice the scaffolding will be achieved with the minimum impact to trees within the buffer zone and will be erected and installed working around tree positions where possible. As a reasonable worst-case affected areas would be limited to a short section of semi mature hawthorn hedgerow and a small group of young to semi-mature ash and hazel which would all readily regenerate from coppicing.

This does not represent a significant change from the existing management of

vegetation within the buffer zone associated with the existing overhead line (necessary to achieve safety clearance)'. – could additional planting be undertaken in this area as part of BNG?

I trust this representation is helpful. Should you have any queries please don't hesitate to contact me.

Yours faithfully

Matthew Wilcock

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