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Dear Sir/Madam

National Grid Electricity Transmission – Non-Statutory Consultation on Weston Marsh to East Leicestershire (WMEL) New Overhead Lines, Substations and the Reconductoring of Existing Lines

Thank you for consulting Lincolnshire County Council (LCC) as part of the Stage 1 (non-statutory) public consultation for the above proposals.

The Council has reviewed the information provided and has the following comments to make in respect of the WMEL non-statutory consultation. This representation sets out the **formal objection** of the County Council to the consultation and given the nature and extent of the matters of concern to the Council, it is not practical for these to be expressed using the format of NGET's consultation feedback form. Please note the comments are limited to the Weston Marsh to Corby Glen portion of the proposed project (section 1 to 4).

The Council notes that WMEL proposals are part of a scheme of proposals to upgrade the electricity network and infrastructure known as 'The Great Grid Upgrade'; developed by NGET and consent will be sought via an application to the Planning Inspectorate for a Development Consent Order (DCO). Whilst the Council notes that the proposal is in the very early stages of development, the precise location and design of the proposal is not yet available and there are no environmental assessment reports currently available to assess the environmental impacts of the proposal.

It is noted that in addition to the new and reconducted overhead lines, two new substations are also proposed. The project will consist of the following:

- Upgrading of the electricity transmission network through the construction of approximately 60km of overhead lines (OHL) between Weston Marsh and East Leicestershire.

- Two new substations: WMEL-A (west of Corby Glen, Lincolnshire) and WMEL-B (located at Wartnaby, Leicestershire).
- Upgrade (via reconductoring), of approximately 55km of existing overhead lines between East Leicestershire and Grendon, Northamptonshire.

This proposal would require connection with a new substation planned as part of the Grimsby to Walpole development, located in Weston Marsh. The specific location proposed for this substation is not yet decided, but NGET currently have a refined substation siting zone.

The proposal is in the early stages of development and thus the precise location, design and environmental assessment reports are not yet available, preventing an assessment of environmental impacts. Specific technical responses are therefore limited in their details. As the project evolves, future engagement and consultation will provide further information surrounding these projects proposals, which will allow LCC to provide more detailed technical comments on expert areas within our responses.

Principal of Development

The following NPS's (dated November 2023) that came into force 17 January 2024 are considered relevant to the determination of this DCO application:

EN-1 - Overarching National Policy Statement for Energy

EN-1 (Overarching National Policy Statement for Energy) confirms the Government's 2050 net zero ambitions. It also identifies the need to ensure the UK is more energy independent, resilient and secure requires the smooth transition to abundant, low-carbon energy. Government identifies that, inter alia, interconnectors and electricity networks have a role, enabling less of the output of plant being wasted and supply provided where demand is higher.

EN-5 – National Policy Statement for Electricity Networks Infrastructure

EN-5 recognises electricity networks as *“transmission systems (the long-distance transfer of electricity through 400kV and 275kV lines), and distribution systems (lower voltage lines from 132kV to 230V from transmission substations to the end-user) which can either be carried on towers/poles or undergrounded”* and *“associated infrastructure, e.g. substations (the essential link between generation, transmission, and the distribution systems that also allows circuits to be switched, or voltage transformed to a useable level for the consumer) and converter stations to convert DC power to AC power and vice versa.”*

Energy Infrastructure Position Statement - On 5 December 2023 the Council adopted an Energy Infrastructure Position Statement 2023 which set out the principles that should be applied in responding to Nationally Significant Infrastructure Projects. One of the principles of this position statement is that all new grid infrastructure required to connect energy development to the grid should be predicated on underground first, or on existing routes.

The Council's position is that it does not and will not support any new overhead pylon lines which impact on the county and its vitally important landscapes and should be prepared to explore with developers any new technologies such as smart grids which address the need for energy whilst being sensitive and suitable to the natural environment.

The Council recognises that NGET have been tasked with delivering new infrastructure to connect energy developments that will reduce carbon emissions, to decarbonise the grid, improve energy supply resilience, and help to meet the challenges of climate change.

The key arguments presented within the consultation documentation for the development are that:

- More capacity is needed across B9, and
- Insufficient transmission capacity is available south of Walpole.

It is then concluded that a circuit north of Walpole (above B9) which diverts power away, to a route west of Walpole (below the B9) addresses these issues. It would also be beneficial in preventing further development in Lincolnshire, which is subject to a significant number of NSIP projects as shown on the Planning Inspectorate's update report, updated 21 July 2025, of both upcoming applications as well as projects in the application process, compared to Northamptonshire. It should be noted that this report does not include projects that have been granted, which currently comprises 7 projects.

However, the Council is not convinced with this argument with respect to B9. There does appear to be merit in relation to the concerns with regard to the lack of capacity south of Walpole. If B9 is discounted, then a more logic reinforcement would be from Walpole rather than Weston Marsh, with Option 5: Walpole B to Tilbury (subsea) meeting NGET's objective and the Council's.

The consultation documentation does not evidence that this scenario has been fully considered and the Council would wish to see this alternative considered further and if it is discounted, full reasons for this decision being made available to the Council to scrutinise.

Unfortunately, at this stage the Council considers that in the consultation documentation, NGET have not presented a comprehensive and conclusive set of evidence that the transmission objectives of this project cannot be met using an offshore link or links, with less harmful impacts on the terrestrial environment of Lincolnshire.

This responses below provide 'without prejudice' comments on the non-statutory consultation.

Cultural Heritage

Built Heritage and Historic Landscape

The preliminary routes have the potential to affect a wide range of important landmarks such as Grimsthorpe Castle, Castle Bytham and Woolsthorpe Manor, along with a number of historic market towns and villages such as Weston, Irnham and Pinchbeck, all containing designated and non-designated heritage assets.

As stated in the preliminary routing and siting study, option 3 appears marginally preferable on heritage, landscape and visual grounds, with fewer crossings of sensitive fenland, a simpler alignment, and marginally fewer residential/recreational receptors. Nonetheless, all options will require careful refinement to avoid or reduce setting impacts on individual assets.

The emerging preferred siting area for WMEL-A lies immediately west of Corby Glen, on rising ground between Long Wood and the East Coast Main Line. This transitional landscape between the Kesteven Uplands and Rutland Plateau could render large-scale electrical plant conspicuous unless landform and woodland screening are fully exploited. In addition, examples of potential setting impacts for assessment include Corby Glen Conservation Area and nearby historic farmsteads. As part of the progression of this scheme, early consultation on photomontage, Zone of Theoretical Visibility (ZTV) and Zone of Influence (ZOI) work would be beneficial and welcomed.

In relation to route section 1-4 (i.e. those within Lincolnshire), a full HER search and gazetteer of designated and non-designated assets within a 5 km study area (wider for Grade I/II* assets) is recommended for the desk based assessment (DBA), given the long-range visibility of OHL towers across the fens and limestone uplands. Some early pinch-points include:

Section	Key Sensitivities
1 – Weston Marsh → South Forty Foot Drain	Flat, open fen landscape – extensive views. Narrow corridor between Surfleet and Pinchbeck; dispersed historic farmsteads within this area; setting of Newhall Grange moated site (SAM). Particular care should be taken to avoid “wirescape” effects in this open landscape.
2 – South Forty Foot Drain → Irnham	Fen-edge villages (Morton, Haconby, Rippingale etc); East Glen River crossing; proximity to Grimsthorpe Castle – likely to require sensitive mitigation.
3 – Irnham → North and South Witham (inc. WMEL-A)	Undulating limestone dip-slope with frequent ancient woodland, remains of the preceptory at South Witham and several medieval moated sites.

The following are suggested sources for the DBA – Historic Farmsteads: *Greater Lincolnshire Farmstead Character Statement* (Historic England, 2015)¹ and for Historic Landscape: *Historic Landscape Characterisation: The Historic Character of Lincolnshire* (LCC & Historic England, 2011)², both of which should form part of the baseline for the DBA.

Non-designated above-ground heritage assets and historic landscape features (ridge-and-furrow, ancient hedged lanes, parliamentary-enclosure field patterns, former rail alignments, etc.) will also need systematic mapping with a 5km study area and a comprehensive list of these assets provided in the DBA.

In terms of any construction proximity and temporary impact, temporary compounds, lay-down areas and haul roads should avoid the curtilage or key views of heritage assets. Vibration impacts on fragile structures (e.g. medieval churches) should also be considered.

¹ [Greater Lincolnshire Farmstead Character Statement | Historic England](#)

² [Lincolnshire historic landscape characterisation](#)

Following development, reinstatement of hedgerows, drains and historic field boundaries should reflect historic character and locally distinctive enclosure patterns.

WMEL coincides spatially with several other major infrastructure projects in the region, including the Grimsby–Walpole OHL, Lincolnshire Reservoir and multiple solar farms. The ES should include a clear methodology for assessing cumulative setting and historic landscape change, particularly in relation to designed landscapes such as Grimsthorpe Park.

In summary, in relation to built heritage and historic landscape:

1. All heritage receptors should remain in scope until tower positions and substation envelopes are fixed. Premature scoping-out of potentially affected assets should be avoided.
2. Produce detailed ZTV and ZOI studies for all designated heritage assets (listed buildings, RPGs, scheduled monuments and conservation areas).
3. Apply the Holford Rules– including avoiding wirescape in flat fenland areas and using natural landform and vegetation to reduce setting impacts.
4. Share draft route refinement and design iterations at each stage. Early, iterative engagement will help streamline the process at later stages.
5. Provide a draft outline heritage mitigation strategy (including historic landscape restoration and design measures) at the statutory consultation stage.
6. Provide a summary of the design evolution, setting out how mitigation and route adjustments have been used to avoid or reduce harm to sensitive heritage sites.

Archaeology

The Council has concerns regarding the very high-level nature of the route appraisals undertaken so far to identify the emerging preferred route. Whilst the Council is pleased that heritage constraints have been included within the Corridor Preliminary Routeing and Siting Study report, these have only included Scheduled Monuments, Listed Buildings, Registered Parks and Gardens and Conservation Areas. No use of the Historic Environment Records has been made, despite the report acknowledging that archaeological remains of very high value could be present and that adverse effects on buried archaeology are likely throughout the route corridor. This represents an avoidable risk within the assessment process and much greater use of available data and bespoke surveys for the EIA stage of the DCO process is expected.

The use of the Horlock Rules is welcomed so far and environmental issues considered from the earliest stage to balance the consequential environmental effects and that siting should seek to avoid areas of the highest amenity, cultural or scientific value. Heritage and archaeology bring substantial value to the public and therefore harm to this significance should be avoided and there are established methodologies for assessing the significance of heritage assets that should be used.

It is welcomed that the historic environment topic has been scoped in at Stage 2 within the Corridor Preliminary Routeing and Siting Study (Paragraph 4.3.7) and strongly recommend

that the historic environment is included in the list of topics covered in the Defined Proposal and Statutory Consultation Stage (Stage 3) and Environmental Impact Assessment. These are a crucial part of the EIA process, and establishing an effective and fit for purpose baseline is imperative to allow the formulation of site-specific archaeological mitigation and archaeological management plan.

We advise that the EIA include a full desk-based and aerial assessment, given the need to determine the archaeological potential across the graduated swathe to inform route selection, manage risk and to understand what reasonable mitigation is necessary to deal with the development's impact. It is recommended full geophysical survey and trial trenching only following detailed route selection and should not be undertaken across the full graduated swathe.

Whilst we acknowledge that the site selection process is iterative, it is strongly recommended once the graduated swathe has been narrowed down that sufficient archaeological field survey, both intrusive and non-intrusive, is undertaken as part of the environmental surveys to inform decision-making.

The EIA will need to contain sufficient information from both non-intrusive and intrusive surveys on the archaeological potential and must include evidential information on the depth, extent and significance of the archaeological deposits which will be impacted by the development. The results will inform a fit for purpose mitigation strategy which will identify what measures are to be taken to minimise or adequately record the impact of the proposal on archaeological remains. This is in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which states

"The EIA must identify, describe and assess in an appropriate manner...the direct and indirect significant impacts of the proposed development on...material assets, cultural heritage and the landscape" (Regulation 5 (2d)).

Within the Stage 1 Consultation Document, managing and mitigating effects for ecology and soil impacts from the construction phase is briefly covered. We would advise that ecological mitigation, and Biodiversity Net Gain works, and soil remediation, have the potential to cause harm to archaeological remains, therefore, impacts from these measures should be included within the EIA.

The full standard suite of archaeological evaluation is required with the DBA produced as soon as possible across the red line boundary, the results of which are required to inform route selection across the graduated swathe. Please see the Lincolnshire Archaeological Handbook³ for the DBA requirements.

Please be advised that most of Lincolnshire is not suitable for trenching over the wet winter months so it is pragmatic to ensure there is sufficient time during those seasons where evaluation work particularly trenching can be effectively undertaken.

The trenching results will inform the site-specific mitigation strategy which will need to be reasonable and proportionate. Mitigation measures must be arrived at through site-

³ <https://www.lincolnshire.gov.uk/downloads/file/2204/archaeology-handbook-pdf>

specific understanding of the surviving archaeology and its context for them to be proportionate and fit for purpose.

Impacts on Scheduled Monuments, such as the moated site of Newhall Grange within Route Section 1: Weston Marsh to South Forty Foot Drain should be avoided, or minimised, through design and route selection. Scheduled Monuments are nationally significant high amenity value sites and any impact on these designated sites should require exceptional justification.

It is disappointing to note that archaeology, heritage and the historic environment are not covered at all within the Stage 1 Consultation Strategy, the Stage 1 Consultation Document or the earlier Non-Statutory Consultation Strategy. There is also no mention within the Stage 1 Consultation Community Newsletter of any heritage-related surveys or commitments. We would like a commitment to identifying, protecting and enhancing the historic environment along the emerging graduated swathe, similar to the commitment to BNG as stated within the Stage 1 Consultation Document (page 24).

The Council is pleased to see that the Strategic Options Report commits to meeting legal obligations under Section 9, Section 38 and Schedule 9 of the Electricity Act to *"...have regard to the desirability of preserving natural beauty, of conserving flora, fauna, and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and to do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects"*.

In summary, the EIA will require the full suite of comprehensive desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact. The results should be used to minimize the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation. The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), and the National Planning Policy Framework.

Ecology

The Council welcomes the commitment to using best practice in the assessment of environmental impacts and the recognition of the importance of protecting and enhancing the natural environment as part of the development process. Given the nature of the proposal and the presence of a number of sites important for their populations of both breeding and wintering birds in the vicinity, LCC is keen to see that appropriate effort is made to both understand and mitigate potential impacts on these sites and their associated bird populations.

LCC also encourages NGET to engage with other developers and organisations working in the area to identify strategic opportunities to deliver environmental mitigation and enhancement including Biodiversity Net Gain. Given the scale of the proposal, the Council encourages NGET to seek to deliver significantly more than 10% BNG as is currently required for non-NSIP developments.

Economic Development

LCC's Green MasterPlan⁴ aligns with the Government's 25 year Environment Plan⁵ which includes statements such as:

- a. We safeguard cherished landscapes from economic exploitation
- b. We will conserve and enhance the beauty of our natural environment, and make sure it can be enjoyed, used by and cared for by everyone. We will do this by safeguarding and enhancing the beauty of our natural scenery and improving its environmental value while being sensitive to considerations of its heritage.
- c. Identifying opportunities for environmental enhancement in all of England's 159 National Character Areas and monitoring indicators of our landscape's character and quality to improve landscapes for people, places and nature. (see below for further information on National Character Area impacts).
- d. The government's refreshment of the 25 Year Environment Plan sets out in its Environmental Improvement Plan 2023⁶, further commitment to its Goal 10 - Enhanced beauty, heritage and engagement with the natural environment. This includes investment in active travel.
- e. A description of the rural characteristics of the South Holland Fenland landscape in Lincolnshire can be found at National Character Area 46 The Fens⁷. The intrinsic value of that landscape can be found on that website within the Statements of Environmental Opportunity.

OHL's for any single part of the route would have a significant impact on the landscape through visual impact and visual amenity and thus its positive appreciation, which in turn would have detrimental socio-economic impacts particularly on tourism. The vision within the South East Lincolnshire Local Plan (2019) (SELLP) states: *'South East Lincolnshire's important heritage and natural assets, landscapes and townscapes will have been protected, conserved, and enhanced where appropriate, to ensure that their inherent social, economic and environmental qualities are retained and that opportunities for sustainable tourism can be realised'*. Similarly, the Adopted South Kesteven Local Plan (2020) seeks to stimulate tourism in Economic Objective 2 and this objective is carried forward into the Regulation 18 (2024) Plan. The proposed overhead line is, in principle, contrary to both Local Plans for the impacts on tourism.

Policy 2 (criterion 1), Policy 3 (criterion 11) and Policy 31 (criterion B1) of the SELLP require that development not impact on amenity and residential amenity, respectively. Policy DE1 (criterion b) of the Adopted South Kesteven Local Plan (2020) and proposed Regulation 18 revisions to Policy DE1 (in criterion 5) of the Revised South Kesteven Local Plan (2024) seek to protect amenity. There clearly will be impacts on amenity from this proposed development for the reasons outlined below.

There is no scale given on the 'Map of new overhead line and route sections 1–5' (refer Stage 1 consultation document: WMEL Stage 1 Proposed New Overhead Line Route

⁴ [Green Masterplan – Lincolnshire County Council](#)

⁵ [25-year-environment-plan.pdf](#)

⁶ [Environmental Improvement Plan 2023: Executive summary - GOV.UK](#)

⁷ [The Fens - National Character Area Profiles](#)

Sections and Substations Maps'), however, it appears that the line could be within hundreds of metres of many settlements of a significant size – at this distance, the pylons and power lines will be very imposing and will have a major impact on the outlook for businesses, residents and visitors.

Notwithstanding the objection and the Council's assertion that the route is not needed to be taken from Weston Marsh but instead could be taken from Walpole and preferably subsea, i.e. 'Option 5 Walpole B to Tilbury (subsea)' of the Strategic Options Report. If it is concluded that the Weston Marsh to Corby Glen route is needed, this should be by using underground cabling.

Notwithstanding the Council's position and in light of the consultation documentation, the following areas are particularly sensitive locations, in terms of visual receptors, that should be underground:

- Route section 1: near Spalding, Pinchbeck and Surfleet and the respective allocations (both housing and employment) in the South East Lincolnshire Local Plan.
- Route section 2: near Dunsby, Morton and Hanthorpe; also near to Thorny Wood, Dunsby Wood (a SSSI) and Spring Wood.
- Route section 3: close to Corby Glen and the residential allocation (refer Policy LV-H5 of the adopted South Kesteven Local Plan (2020)) and the further proposed allocation to the south east of Corby Glen in the Regulation 18 Draft Plan (South Kesteven Local Plan 2023- 2043 Regulation 18 Local Plan – Proposed Housing and Mixed-Use Site Allocations⁸) (consultation 3rd July to 28th August 2025).
- Route section 4: near to North Witham and South Witham.

Following the guidance of LCC's 2023 Energy Infrastructure Position Statement and the Local Plan policies noted above, the Council objects in principle to the overhead cables of the whole proposed route. The Strategic Options Report (at 6.5.12) states that Route 4, which is chosen as the preferred route, will go through Edenham, the actual route in the Stage 1 Consultation document goes very close to several settlements as per the 'Undergrounding Specific Locations' comments below. This therefore has the potential, as stated in the Strategic Options Report, to affect local visual receptors during construction and operation, and the Council does have concerns that further landscape visual receptors will also be affected. The Council would therefore argue that the SOR is flawed in not having appropriately appraised the scheme against adopted local plan policies, draft planning policies (South Kesteven), approved Statements of the Council (Energy Infrastructure and Green Masterplan) and failing to appropriately assess the impact on a number of additional settlements (refer bullet points immediately above).

Temporary workforce

At this stage, the documentation does not provide an estimate of an approximate number of construction employees either at the peak of construction or as an average across the construction stage.

⁸ [Local Plan Review | South Kesteven District Council](#)

NGET should be aware of the potential negative socio-economic effects that could arise from what is expected to be a high number of employees (at least temporarily) residing in Lincolnshire:

- Demographic changes and potentially negative impacts upon community cohesion, which could be significant depending on workforce age, gender and location of temporary accommodation.
- Impact on local housing markets, including availability and affordability, particularly if the workforce is located within nearby smaller settlements.
- Impact on Tourist Accommodation by use of tourist beds.
- Social services and infrastructure, an obvious area for consideration is healthcare but perhaps education and other services, again depending on age, gender and location of temporary accommodation.
- Public health and safety, depending on age, gender and location of temporary accommodation, with potential for anti-social behaviour.

There are also cumulative impacts of temporary workforces from this and the other NSIPS requiring consideration in relation to the above points. There is the potential for a very high number of temporary workers that will need accommodation at a similar time.

It is also noted that no reference to tourism is provided within the Options Appraisal Sub-Topics and Constraints (table 5-4 of the Corridor Preliminary Routeing and Siting Study). It is hoped that future reports will appraise potential impacts.

Community and business benefit potential

Whilst not required as part of the NSIP process, the Council would welcome the inclusion of a range of non-statutory consultees in the development of the proposed scheme. We recommend this list includes local skills providers, both public and voluntary sector providers, including: Boston College, Grimbsy Institution and Voluntary and Community Services. These organisations will be able to support with insight into the current and potential labour market.

Construction phases should avoid peak visitor attraction time, when the visitor economy provides employment and income for local communities. “Bad press” about congestion, additional HGVs etc. can have a big impact on the number of visitors who come to the area, and this must be taken into account when planning the scheme.

Raising aspirations within the local communities

Evidence shows that low aspirations in communities is a key blocker to accessing employment. Such an intense, high-profile project can help raise aspirations in local communities by supporting local incentives and schemes. These will support the project by unblocking barriers to local people accessing employment. This will need to be a funded activity by the developer.

Highways and Flood Risk

The Council has no comments to make at this stage on either highways or surface water flood risk. When the scheme is more developed, engagement can take place with NGET and their consultants on likely scope necessary for Transport Assessment and Flood Risk

Assessment. At this early stage there is no obvious problem with the proposed routing shown and we await further development.

Landscape and Visual impact

There is limited detail presented that relates to landscape and visual matters, as such the comments provided are high level. The information provided is useful in setting the scene, and the graduated swathe demonstrates a considered approach to the early stages of the design. Adverse landscape and visual effects are expected to be associated with the scheme, particularly for the large above ground elements, namely the sub-station. The cable route, however, also has the potential to generate adverse effects, particularly at the construction phase, therefore, the routing and detailing of these elements is important to minimise effects.

Human Health

No reference to the impacts upon human health are provided within the documentation. The implication of the OHL and substation on human health needs to be considered, with either a Health Impact Assessment provided to support the DCO application, or a specific consideration of health impacts (both physical and mental) provided in each chapter of the Environmental Statement.

Public Rights of Way

There are a number of public rights of way that intersect with the graduated swathe, and these will need to be considered as part of any firm design. Ideally the pylon towers should be situated away from any of the rights of way.

Many cables from pylons run overhead of public rights of way so there is precedent for this, however heights of the cables and potential interactions with horses and their riders should be considered. Rights of way should not run through the pylon structure itself.

There are pockets of common land and SSSI land within the graduated swathe which will need to be considered.

Any haul roads going across rights of way need to be considered carefully. The developer should avoid installing additional gates and should adhere to the British Standard for Gaps, Gates and Stiles (BS5709:2018) which advocates the least restrictive option to be chosen (the hierarchy is gap, gate, kissing gate, stile – but no new stiles will or should be authorised as it does not meet Equality Act 2010 duties). One solution for haul roads has been to have gates that open across the path only when traffic are passing – having gates that open onto the highway will require Highways Authority consent under the Highways Act 1980.

It should be remembered that the right of way take priority over the haul road traffic so any gates or barriers should be closed immediately after passing, and this should be included in any PROW (Public Right of Way) Management Plan or in a Construction Environmental Management Plan (CEMP). The surface of a right of way should be protected so it is not destroyed through construction traffic, and steps onto public rights of way should be avoided on accessibility grounds.

Advance notice period, advertising and firm deadlines for closures should be considered. The DCO should not give carte blanche powers to close rights of way without notice, as the public would not know when something is closed etc., and officers would not know what is or not an enforcement issue. The standard template DCO is deficient in this aspect so should be redrafted. It is suggested following the standard Road Traffic Regulation Act 1984 timescales and procedure. Also, our network management team will need to be involved in any discussions regarding closures.

There may be opportunities for improvement of the public right of way network as part of the DCO process as a betterment (for example possibly retaining the haul roads as a public right of way). One particular need in this area is to have safe crossing points over the A1 and the A15. Consideration to this as part of a community benefit would be welcomed,

Soils /Agricultural Land Classification

The loss of best and most versatile (BMV) agricultural land, which is critical to national food security, is a particular concern for Lincolnshire. As a result of the number of large-scale energy proposals that are coming forward in the county, many thousands of hectares of BMV land could potentially be lost. Attention is also drawn to the Council's Energy Infrastructure Position Statement adopted 5 December 2023. The Council will seek to protect high quality agricultural land in Lincolnshire (Grades 1, 2 and 3a) from development in accordance with its Position Statement⁹.

It is noted that within the Corridor Preliminary Routeing and Siting Study document that the impact upon BMV will be considered at later project stages as the precise locations for the pylons is known. All efforts need to be made to minimise impacts upon the highest quality land if the line is not a sea link.

Waste and Minerals

Comparing the consultation map with our Minerals and Waste Local Plan mapping, the emerging preferred corridor intersects with (west to east) the following Mineral Safeguarding Areas (MSA):

- Limestone MSA at Irnham – Cuts across the edge of this small MSA.
- Limestone MSA for what appears to almost be the entire route from Corby Glen to the county border.
- Site Specific MSA at South Witham.

Depending upon the exact route, several existing waste sites may be affected, although the operations may not be impacted by a pylon cable route.

Additionally, WMEL-A substation is also in a Limestone MSA, therefore Policy M11 of the Lincolnshire Minerals and Waste Local Plan, Core Strategy and Development Management Policies, June 2016¹⁰ (MWLP) will apply. At this stage of the scheme's development, the

⁹ [Microsoft Word - 10.0 Energy Infrastructure Position](#)

¹⁰ [Lincolnshire Minerals and Waste Local Plan](#)

policies within the MWLP need to be considered, in particular, Policies M11 & M12 and their accompanying maps. These should be considered as part of the proposed route.

The consultation documents make no mention of waste management. Documentation forecasting waste types, quantities and how it is intended to be managed is welcomed as soon as possible.

Cumulative Impacts

Whilst WMEL is a separate project, in terms of the new OHL, to other proposed energy projects in this part of Lincolnshire, such as the Grimsby to Walpole Scheme / Eastern Green Link 3 and Eastern Green Link 4 also part of the Great Grid upgrade, the Outer Dousing scheme and Lincolnshire Reservoir, the Council are very concerned about the cumulative impact of these projects which have the potential to overwhelm the local communities, and significantly adversely impact on the environment, in particular the character and appearance of the Lincolnshire Countryside.

The Council are also very concerned about the potential for significant transport related impacts during the construction phase as a result of multiple Nationally Significant Infrastructure Projects (NSIP) schemes being developed over a similar time period, in an area of Lincolnshire that is rural in nature with limited network capacity.

It is disappointing at this stage that the consultation documents gives little consideration to the cumulative impact of these energy projects. The Council will expect full consideration to be given to the cumulative impacts with all other proposals as the application documents are progressed. Every effort should be made to work collectively with the other NSIP developers so that impacts can be minimised. It would have been useful to have provided a plan in the consultation documents so that the public can see how the Grid Upgrade projects relate to each other geographically and other energy projects that are currently being progressed.

In view of the scale of the infrastructure that is proposed as part of the Great Grid upgrade schemes, it is considered essential that NGET commit to producing a masterplan of the proposed Lincolnshire Connection Substation(s) to consider not only the NGET substations that are proposed (as part of the Weston Marsh to East Lincolnshire scheme) but also the converter stations and other infrastructure proposed as part of other NSIP schemes so this can be considered holistically, rather than as an unplanned incremental approach as developers bring their proposals forward.

Inter-project Cumulative Effects such as converter stations, the potential impact of construction (geographically and temporally) and construction traffic in combination with the traffic arising from the construction of other large DCO projects such as Ossian, Outer Dousing, Grimsby to Walpole, EGL 3 and EGL 4 and any large TCPA permissions should also be assessed and a mechanism derived collaboratively with other projects to manage construction periods and impacts.

The cumulative impact of the sheer number of NSIPs in Lincolnshire could change the rural character of the county. The effects of this potentially significant industrialisation of the landscape on the county's perception by visitors and tourists as well as residents and businesses, is currently not well understood and needs to be considered. Please see the

Socio-Economic section above regarding potential negative socio-economic effects alone and combination with other NSIP projects.

Future Impacts

The consultation documents make no reference to the strong likelihood of the new sub-stations providing a catalyst for many new developments seeking a grid connection. As noted within our response, there are many NSIP proposals at various stages across Lincolnshire seeking to take-up great swathes of the county's agricultural land. The Council has great concern that this development, if granted, would lead to a significantly greater number of solar and other proposals.

Community benefits

Whilst the Council maintains its objection to this proposal, should the DCO be granted consent, those affected should receive benefits. There is no reference within the consultation documentation to the possibility of community benefits as identified in current guidance 'Community funds for transmission infrastructure'; ¹¹. Notwithstanding the Council's objection to this development, it is trusted that affected residents will have opportunity to engage on benefits as the scheme progresses and is refined in accordance with this guidance?

It is also questioned whether there is a potential for local communities to benefit from this development in terms of local energy supply? Additionally, whether there is any restriction on the amount of energy that the local community is able to access, what the process is for accessing this energy and whether or not there is scope for more to be accessed in the future? Parts of Lincolnshire have a significant shortage of energy supply, restricting existing and potential businesses from achieving their potential growth, and limiting and impacting on the decarbonisation of these businesses. Local communities are facing the impact of fuel poverty and live in some of the most socially and economically deprived communities in the region, whilst being most affected by these developments.

Whilst it is understood that this development will not impact the local distribution electricity network, the Council expects the proposal to detail how mitigation from the negative impacts felt by the business and residential community will include benefit in the power that these communities receive. This is a local and strategic priority.

From an economic development perspective, accessibility of employment to the rural communities is suggested with consideration to:

- Information and collaboration.
- Access to construction employment, up-skilling and re-skilling.
- Opening up the supply chain.

This may be achieved through:

¹¹ [Community funds for transmission infrastructure \(accessible webpage\) - GOV.UK](#)

- Funded travel to work schemes – the Council is able to help scope and identify suitable projects in the area.
- Engagement and partnership with local transport providers.
- Support for local people to access private transport at reduced cost, where the above solutions are not possible (last resort).
- Preparing the local labour market for the forthcoming opportunities. This could include:
 - Local provider engagement at an early opportunity.
 - Sector development support, to allow local supply chain to prepare existing workforce, and build and encourage opportunities to grow the workforce.
 - Bespoke activity that encourages our evidenced 'hard to reach' and opportunity potential workforce (over 50's, retired military etc) to access new skills and jobs.

It is hoped that NGET will look to provide these and other community benefits for Lincolnshire above minimal amounts. Further dialogue with the Council on the expected community (including business) benefits from such a development as one of a number creating a cumulative impact on Lincolnshire business and residents, is requested and welcomed.

Other matters

The Council wish to draw NGET's attention to other localised considerations in respect of local environmental impact, ecological impact, heritage impact and localised residential amenity which cannot be fully assessed at this stage, given the absence of a defined route, and therefore detailed technical submissions.

The Lincolnshire coast plays a crucial role within the East Atlantic Flyway which is one of the seven sites in the UK on the tentative list for UNESCO World Heritage site status. The Greater Wash Special Protection Area is a key part of the East Atlantic Flyway and encompasses extensive coastal and marine habitats that are protected due to their importance for bird conservation. The Lincolnshire coast supports internationally important numbers of birds, with over 250,000 waterfowl and waders wintering in the region. Important sites include Gibraltar Point National Nature Reserve and the Humber Estuary which supports internationally significant populations of a range of individual bird species and totals of over 150,000 waterfowl and waders during Spring and Autumn migration periods.

In addition to wintering and migratory birds, the Lincolnshire coast and its hinterlands are crucial to the breeding success of a range of bird species. This includes species which rely on coastal wetland sites as well as important populations of farmland birds which nest in the Lincolnshire coastal grazing marshes. The Greater Wash SPA is critical for the breeding success of species like the Little Tern, which relies on undisturbed beaches and coastal habitats for nesting.

The Lincolnshire coast's internationally important habitats include salt marsh and sand dunes which in turn provide habitats for rare and sensitive species like the natterjack toad.

In recognition of this importance and sensitivity, a series of statutory wildlife designations are in place. These include Sites of Special Scientific Interest, Special Protection Areas, Special Areas of Conservation and Ramsar sites aimed at supporting and maintaining the ecological integrity of this important area.

The loss of best and most versatile (BMV) agricultural land, which is critical to national food security, is a particular concern for Lincolnshire. As a result of the number of large scale energy proposals that are coming forward in the county, many thousands of hectares of BMV land could potentially be lost. The impact on BMV land, although this might be minimal compared to a large-scale solar development, will be affected. This does not appear to have been given any significant consideration as part of the strategic option selections.

Conclusions

Unfortunately, at this stage the Council considers that in the consultation documentation, NGET have not presented a comprehensive and conclusive set of evidence that the transmission objectives of this project cannot be met using an offshore link with less harmful impacts on the terrestrial environment of Lincolnshire, or an alternate reinforcement from Walpole.

The Council will pursue rigorously the continuation of the subsea cable option to the connection. NGET should be aware that the Council considers this to fundamentally be the correct approach.

For the reasons set out above, the Council is left with no option but to object to the proposals as currently presented.

The Council is prepared to continue to work with NGET in developing its proposals and provide technical feedback and engagement at appropriate times, based on the above. If you require any further clarification or assistance on this matter, please contact Lisa Hughes (NSIPS@lincolnshire.gov.uk).

The Council would be pleased to continue dialogue in relation to the main issues identified above through the programmed update meetings, expert topic group or via subject specific meetings as required.

Yours faithfully

Neil McBride

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