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Dear Sir/Madam

**SUBJECT: LINCOLNSHIRE COUNTY COUNCIL RESPONSE TO GRIMSBY TO WALPOLE STATUTORY CONSULTATION**

The following comments from Lincolnshire County Council (LCC) are in response to the statutory consultation held between 11 June and 6 August 2025 by National Grid Electricity Transmission (NGET) upon the Grimsby to Walpole proposals to construct a new 400KV electricity transmission line with up to six substations between Grimsby and Walpole.

This letter and attached documents set out the County Council's response to this statutory consultation under Section 42 of the Planning Act 2008. The technical officer-level comments below are made on a without prejudice basis and the County Council reserves the right to make further comments at the subsequent Submission Stage and throughout the Examination process. The County Council welcomes the opportunity to comment on the Preliminary Environmental Information Report (PEIR), which has been prepared in support of the Project.

The entire route is 140 Km (90 miles) in length and crosses parts of North-East Lincolnshire, Lincolnshire and Norfolk. The section through Lincolnshire is by far the largest proportion covering around 130km and including at least four substations. The scheme would run close to the designated Lincolnshire Wolds National Landscape.

This representation sets out key issues with the attached documents providing detailed technical comments including the full report produced by Andy Hoirns examining the technical need for the project. Given the extent and nature of the matters of concern to LCC it is not practical to use the format of NGET's consultation feedback form.

As its starting point to this response, on 5 December 2023 LCC adopted an Energy Infrastructure Position Statement which set out the principles that should be applied in

responding to NSIPs in Lincolnshire. A principal requirement 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. LCC 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 LCCl 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.

**Context and National Policy**

At the end of 2023 the Government published a series of updated NPSs, the most relevant being: EN-1 (Overarching National Policy Statement for Energy); EN-3 (Renewable Energy Infrastructure); and EN5 (NPS for Electricity networks Infrastructure).

EN-1 recognises that new electricity infrastructure will have to be built to replace output from retiring plants and to meet increased demand. EN-1 indicates that "given the changing nature of the energy landscape, we need a diverse mix of electricity infrastructure to come forward, so that we can deliver a secure, reliable, affordable, and net zero consistent system during the transition to 2050 for a wide range of demand, decarbonisation, and technology scenarios."

EN-1 also states that given the urgent need for new electricity infrastructure and the time it takes for electricity to move from design, conception to operation, there is an urgent need for new (and particularly low carbon) electricity projects to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.

In the Government's consultation on new Energy Infrastructure (April 2025) covering NPSs 1, 3 and 5, it has indicated that Projects relevant for Clean Power 2030 can be deemed Critical National Priority (CNP), with a presumption in favour of consent. Existing EN-1 defines CNP as nationally significant low carbon and includes: electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as Substations.

Emerging NPS EN-3 and EN-5 (2025) reiterate the Government's conclusion that there is an urgent need for new major electricity infrastructure. EN-5 indicates, "as identified in EN-1, government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. This includes: for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as Substations."

NPS EN-5 (2023) refers to the Horlock Rules which are guidelines for the design and siting of Substations and were established by National Grid in 2009 in pursuance of its duties under Schedule 9 to the Electricity Act 1989. These rules are set in paragraph 2.9.19 of EN-5 and cover, *inter alia*: environmental; landscape; local amenity; visual impact; noise; and socio-economic factors.

The Government has asked the National Energy System Operator (NESO), a new body created under the Energy Act 2023, to produce a 'Strategic Spatial Energy Plan' (SSEP) by 2026, with a methodology for producing it to be published by the end of this year (2025). This is likely to result in a new set of NPSs being produced once the SSEP is published.

The SSEP 'will assess the optimal locations, quantities, and types of energy infrastructure required, across a range of plausible futures, to meet future energy demand with the clean, affordable, and secure supply that we need'.

The purpose of the SSEP is not to make site-specific recommendations nor prescribe or authorise specific projects but is to offer a guide to spatial characteristics, and maps are expected to be produced.

The key objectives of the UK's Clean Power 2030 Action Plan are to achieve a fully clean electricity system by 2030, reduce greenhouse gas emissions, and enhance energy security and affordability. This involves a significant shift to renewable energy sources and a reduction in reliance on fossil fuels. It recognises that the deployment of low carbon electricity infrastructure needs to be speeded up through reform of the existing legislative framework.

Set out below is the Council's key strategic response and are accompanied with detailed technical comments set out in attached documents in relation to Landscape and Visual Impacts, technical considerations and Public Rights of Way impacts.

**Overarching Strategic Comments**

In very broad terms the Project proposed by National Grid is consistent with the recently published National Policy Statements (NPSs) EN-1; EN-3 and EN-5; and the consultation versions of these NPSs as they will provide "…a diverse mix of electricity infrastructure to come forward, so that we can deliver a secure, reliable, affordable, and net zero consistent system during the transition to 2050 for a wide range of demand, decarbonisation, and technology scenarios" (EN-1). National Policies (EN-5) support network reinforcement and upgrade works, and associated infrastructure such as Substations. It is acknowledged that at the national level and based on the current Government's National Policy Statements the infrastructure proposed has a critical national priority (CNP) with a presumption in favour of consent.

The Council's position is that whilst the Government's objectives are set out in the National Policy Statements for this particular project there are fundamental questions about the need and how this requirement is delievered and consequently if all the proposed infrastructure is necessary.

Whilst there is a national policy presumption for this grid infrastructure it is not at any cost and there is no clear evidence that Lincolnshire will experience any immediate benefits from this Project with the power flowing according to NGET to the Midlands and the South of England. Therefore, while acknowledging the Government's view of a wider strategic need for energy security; providing more electricity to the Midlands and South of England; and

the move away from fossil fuels, the proposal as set out does not bring any direct or immediate benefits to Lincolnshire in terms of providing energy to existing or planned homes and businesses. As currently set out, the Project would see energy passing through the County with no evidence that the electricity could be used in Lincolnshire to provide resilience to the County's transmission network. The County has significant planned housing and employment growth and as such consideration should be made by NGET as to how Lincolnshire could potentially benefit from any new electricity infrastructure in terms of clean energy supplies; and resilience of supply. NGET need to actively engage with LCC and other key stakeholders, including the distribution network operators (DNO), to explore how these project could provide demonstrable strategic benefits for the County by committing to a mechanism as to how a reasonable proportion of the energy passing through the County can directly benefit the communities of Lincolnshire.

**Key Issues**

**Alternatives**

Whilst it is conceded that in line with the current National Policy Statements there is a national need for this type of infrastructure to meet the current Government's objectives what is disputed by the Council is that this particular project is required at this time and if it is later demonstrated that there is a need for this project it should be delivered in a different way than overhead lines and pylons. If the need case is substantiated the Council contend that there is a credible alternative removing the northern section of the project and cabling the central section.

The Council has commissioned consultant Andy Hiorns to produce a report into the need and alternatives for the Grimsby to Walpole proposals. The report has concluded that there are two alternative pathways that could deliver the overall objectives of this project in a way that significantly reduces the proportion of overhead lines and pylons instead using cabling that is a better fit with the LCC's Energy Position Statement.

<u>Lincolnshire Node and Weston Marsh Substations</u>

It is noted that these substations provide a means of connection for multiple energy projects from both those being promoted locally and also from much further away such as the EGL 3,4 and 5 cable routes from Scotland. LCC is concerned about the impacts of this proposal in its own right but when the other projects in this area that are emerging there is significant concern about the impact upon the local communities and residents. This proposal must also take into account the cumulative impacts from all the other projects both in respect of their construction and operation stages.

LCC request that a master plan is required for both areas of these sub-stations including the requirements of this project and those that are expected in the future. Indeed it is noted that the proposals for the Weston Marsh Sub-station will be subject to a round of targeted consultation in early 2026 and the search area for this sub-station has extended considerably due to the uncertainty as to how many sub-stations that would be required for this project and other emerging projects. This has not taken into consideration additional

sub-stations and convertor stations that will be necessary for the other projects that will connect into the NGET sub -stations. These master plans are necessary to identify further options for mitigation and infrastructure reduction to minimise adverse impacts on the host communities.

Other than listing the committed connection points for a significant number of energy projects to connect into the substations, no reference is made to the infrastructure that each of these energy projects will require. The cumulative impact from the overhead lines pylons, National Grid substations and those substations that will be required for the other energy projects would overwhelm the communities of Alford and Weston and have the potential to significant impact on the character of the Lincolnshire Wolds National Landscape

Included with the consultation documents is a Strategic Options report that considers other options and different technologies for the transmission upgrade without any clear understanding of costs benefits or how the conclusions were reached. Despite the Council requesting information on how these costing figures have been reached in its response to the non-statutory consultation last year no subsequent information has been provided. The Council has also sought to obtain this information using both Freedom of Information and EIR requests to NGET and NESO earlier this year but are still no further on understanding the information that was used to substantiate these conclusions. Despite this costing and other information being requested during the non-statutory consultation phase and through FOI and EIR no such information has been provided. Together with the costing and generation information requested to NGET, LCC has still not been provided with details to enable an understanding of how NGET's approach and justification for this project aligns with guidance in the SQSS. Whilst it is assumed that NGET has conducted detailed analysis to demonstrate that their methodology identifies the optimal economic level of transmission based on the 2022 FES this analysis has not been included in the strategic optioneering reports provided to LCC in its EIR requests.

The failure to provide this information compromises the ability of LCC to fully evaluate this project and conclude if it complies with all the necessary standards and guidance. Without this information LCC can only conclude that it has not been provided by NGET because it does not conform to the necessary tests and in the interests of public transparency of a project that will detrimentally affect so many communities across Lincolnshire. This information should be provided to LCC as a matter of urgency.

Therefore, LCC must conclude at this stage that for this option consulted on, NGET has not made sufficient information publicly available to fully evaluate if it there is a critical need for this project. Given the significant impacts that this project will have on the residents and communities of Lincolnshire LCC consider that all the information that has been used to make the case for this project should be available for public scrutiny.

Turning to specific topics these are addressed below with additional supporting information in the appendices.

**Technical Review**

Attached to this response is a detailed report produced by Hoirns Smart Energy Networks. This report evaluates NGET's network reinforcement proposals for the Grimsby to Walpole 400kv overhead lines and puts forward and evaluates alternative solutions which reduce the need for overhead lines in Lincolnshire. NGET have not considered the solutions evaluated in this report in the alternatives that they have put forward ahead of choosing the project subject to this consultation.

As a starting point in the evaluation of this project it is noted that Ofgem's observation that it is not currently possible to say with confidence what the generation mix, and location will be following connection reform and the publication of the Strategic Spatial Energy Plan (SSEP), it would seem more appropriate for NGET to wait for the conclusion of these initiatives and then incorporate the outcomes into the assessment of the requirement for the Grimsby West – Walpole 400kV project.

Nevertheless, this report has developed the three pathways which have identified three alternative solutions which could be developed in providing the required additional transmission capacity to accommodate the generation contracted to connect in the Humber and Lincolnshire regions and provide the increased network capability required across the B8 and B9 boundaries against the Future Energy Scenarios (FESS) 2024 Scenarios. In developing these Pathways, it can clearly be seen that there are credible options which avoid the need for the establishment of new 400 kV overhead lines through Lincolnshire

**Landscape and Visual Impact**

The landscape and visual elements of the PIER require further work to ensure it aligns with the scoping report review and other LCC comments submitted in respect of the Landscape and Scoping Opinion. Specifically, there are concerns about duplication of information throughout the landscape and visual chapters which is having a negative impact on the clarity and quality of the information presented. The PIER submission is difficult to navigate, with multiple cross references to multiple volumes and chapters, along with multiple repetitions of information due to the way the PEIR has been broken into sections.

There remains some degree of uncertainty about the development proposals, and consequently the landscape and visual outcomes, but mostly the information required to progress the LVIA / ES has been completed. The PIER contains some good reports and studies, but information within them is not yet utilised effectively to inform the landscape and visual approach to the proposed development.

The Council request that the approach to the layout, graphics and format of the ES, and in particular the LVIA chapter, consider this and streamline the process as much as is possible, while maintaining the robustness of the assessment. Viewpoints and photomontages remain in locations selected by the applicant before there was clarity on the development's design and further work is required to ensure they provide an understanding of the impact on likely affected receptors. At PIER stage, it is felt that the proposed viewpoints do not

adequately cover the AGLV, Wolds National Landscape, linear receptors including the Macmillan Way (listed in AAH TM02 Para. 9 attached to this response), and views around the proposed substations. Consequently, viewpoint locations and photomontages covering these elements remain subject to change and have not been fully agreed, with more information required in the Environmental Statement (ES).

LCC welcome the opportunity to discuss further at subsequent technical working groups prior to the submission.

Mitigation proposals also remain subject to change until the design proposals are finalised and it remains uncertain if on-site and off-site planting indicated can be fully implemented or adequately maintained. Mitigation occurring on development land will require more detail with plans and tables clearly indicating where existing vegetation will be removed; what is being removed (e.g. number of trees and what size and BS5837 Category, or length of hedgerow and assessed value), a justification and explanation for this removal; and how it will be mitigated or replaced. Proposed 'additional' mitigation measures will require cooperation with land owners as many are located outside the project limits where there is no certainty they will be implemented until agreement is confirmed. It is suggested that the ES should only contain mitigation that has agreement so that the assessment of effects is not influenced by undeliverable proposals. The Council notes the writing of a LEMP (Landscape Ecology Management Plan); but do not regard the proposed 5 years after care period as adequate and would expect a minimum of 15 years.

In relation to landscape and visual impact the Council's position is that National Grid needs to provide more evidence to demonstrate that they have adequately discharged their statutory duty to 'protect and conserve' the Lincolnshire Wolds National Landscape (LWNL). Due to the visual sensitivity of the LWNL and its interconnectedness with its setting, it is contented that these duties can only be adequately discharged by either fully or selectively undergrounding the proposed powerlines where they run adjacent to the LWNL.

**Highways and Transport**

LCC seeks to ensure that these impacts are fully assessed and mitigated especially regarding construction traffic impacts on LCC road network with limited alternative options for suitable HGV and AIL routes once route alignment has been chosen. Removal of temporary haul roads and decommissioning needs careful consideration.

The scope and methodology described (**Volume 3 Part A Introduction and Overview Chapter 4 Approach to Preliminary Environmental Information Appendices 9 Traffic & Transport**) is standard and generally agreed subject to some points raised below. As noted in the PEIR a Transport Assessment (TA) will be required to support the application and thresholds for link/junction assessments are different for TA to ES (IEMA guidelines –which define Rule 1 and Rule 2). Proposed thresholds are given in 9.4.27 – these are agreed as appropriate:

*9.4.27 "These links will be considered further within the TA and ES if the total number of all construction vehicles exceeds 50 per day or the number of HGVs exceeds 20 per day."*

Some assumptions are set out in 9.5.1 which are generally supported. It is proposed that construction traffic is derived from first principles – HGVs based on plant and materials. However, traffic associated with construction workers needs to be estimated more comprehensively, figures in Appendix 9C have been derived by applying 100% uplift on HGV numbers which would seem low and without any supporting evidence. (Around 500 workers across the project).

Gravity model methodology is suitable for workers' distribution and materials can be allocated to highway network via likely source locations. The number and location of principal site compounds should be identified and the trips on the public highway allocated on routes to/from compounds.

More information is required on the gravity model and more clarity on output the information provided in **9B.4 Assignment of Construction Worker Traffic** is not clear**.** The Transport Assessment (TA) will need to provide more clarity of the assessment process, showing output of in diagrams of routes for construction traffic. Whilst it is accepted that the information provided in **Appendix 9C Traffic and Movement Future Baseline and Impact Analysis** is preliminary, the derivation of the numbers is not clear and the results do not look appropriate. For example, several key routes have zero construction vehicles predicted e.g. Links CR17-1 and 17-2 which are the A52 in Boston – it would be expected that there would be significant levels of construction traffic on these links. So further work on these assumptions is necessary to make them robust.

Construction traffic numbers are for most "active 12 month period". This statement needs justification, it would be expected that construction activity peaks are shorter (2-3 months have been used on other NSIPs). Using a 12 month period is likely to "flatten out" the traffic impact and not give a representative case of the peak 2-3 month period.

Chapter 10 of **Volume 2 Part C Route-wide Assessments** outlines ES approach to Cumulative Impacts and 10.6.5 lists 18 other large scale projects to be considered. This does not appear to include Viking CCS Pipeline, a Development Consent Order (DCO) which has been approved from Grimsby to Theddlethorpe follows a very similar route as this NSIP. The construction traffic for that approved DCO is likely to impact the same roads in this area and needs to be taken into account as well.

Access and haul roads should minimise impacts on ecological and landscape features and minimise impacts on the efficient and effective operation of agricultural land and businesses.

**Surface Water Flood Risk**

In document **Volume 3 Part C Route-wide Assessments Chapter 5 Water Environment and Flood Risk** - Paras 5A.6.19 – to 21 set out the high level principles of how the FRA will be developed to address surface water flood risk.

The methodology proposed is standard for FRAs and LCC will await more detailed submissions to support the project at the next stage. At this stage, there are no detailed comments therefore relating to Surface Water Flood Risk.

**Public Health**

Landscape and Visuals

Having regular sight of the pylons and/or substation infrastructure may have a negative impact on the mental health and wellbeing of people living along the route of the overhead cables. The Health and Wellbeing chapter only considers the mental health impacts of Electromagnetic Fields (EMF).

New planting that will mature over time during the operation phase to screen the infrastructure should be planted as soon after a DCO is granted as possible, if it is granted, i.e., before construction. Utilising existing woodland for immediate screening is helpful.

Pylons and cables stretching close to the eastern edge of the Lincolnshire Wolds National Landscape is contrary to the statutory purpose of an Area of Outstanding Natural Beauty (AONB) – 'conserving and enhancing the natural beauty of the area' and 'increasing the enjoyment by the public of the special qualities of the area'. It is probable that the Project will negatively impact the Wolds and, therefore, have a negative impact on people's wellbeing, and potentially their mental health. The incorporation of low-height pylons between Barnoldby le Beck and Waithe would do little to reduce the prominence of the overhead line when viewed from higher vantage points within the Wolds.

The Health and Wellbeing chapter is comprehensive, and data presented at Ward level for the affected Wards is welcome. Given that health and demographic profiles are an older, in parts less well, population, and sections of the Project are in a more deprived part of the LCC area, this is important. This cohort, often living with long-term limiting illnesses or disabilities, may be at home for more of the time and consequently more susceptible to health and wellbeing impacts.

Self-reported wellbeing related to anxiety, happiness, life satisfaction, and worthwhile indicators is in line with the national average currently. The Project has the potential for this health indicator to go down.

Design Mitigation Measures

It is accepted that the DCO will include control mitigation measures for the construction phase.

The Council note that the Scheme will be designed and constructed in line with guidance outlined in the International Commission on Non-Ionising Radiation Protection (1998) Guidelines for Limiting Exposure to Time-Varying Electric, Magnetic and Electromagnetic Fields. It is expected that this will be evidenced in the final Environmental Statement (ES), considering the cumulative effect on EMFs from other electricity generating and/or transmission infrastructure projects in the Study Area. For example, Eastern Green Links

and offshore windfarm landfall substations, etc. Even where actual EMF levels are acceptable, the mental health impacts of perceived effects of EMF needs to be considered and mitigated. These cannot be assessed as minor (not significant) at this stage in the DCO process without further and ongoing community engagement.

Effects of the Scheme are not limited to nearby sensitive receptors. Users of the public rights of way and other amenities, etc., in the Study Area must be considered. The PEIR also states that the overhead cables avoid "most" sensitive receptors.

The assessment of noise nuisance will be left to district council environmental protection teams. However, references to noise appear to be mostly around the construction phase. LCC request that consideration is given to the ongoing noise generated by pylons, lines and substation(s), which require careful planning for locations, when they are within earshot of sensitive receptors. When considered against the very low background noise levels in the Study Area, this has potential to spoil the enjoyment of outdoor spaces (public open spaces, private gardens, public rights of way, etc., and consequently impact on mental health and wellbeing. LCC request that this is investigated further to see if research literature exists around such impacts.

Cumulative Effects

The Cumulative Effects Assessment is welcome but does not appear to have been applied to Health and Wellbeing and it is important that it does so, particularly in respect of EMF generation, and impacts on the landscape, visuals, and noise, during operation.

Positive Enhancements

The PEIR appears to be absent on potential positive community enhancement that may offset negative impacts for residents if the DCO is granted. LCC accept that these may be limited with such a linear Project on this scale. However, consider there should be some positive initiatives to offset negatives, such as community fund(s).

**Agricultural Land Classification**

Loss of Agricultural Land

The PEIR indicates that the permanent loss of Best and Most Versatile (BMV) land (i.e. Grade 1, 2 and 3a).

While the loss of agricultural land is not of the scale seen for solar farm developments, it nevertheless raises concerns when taken together cumulatively with other NSIPs coming forward across Lincolnshire as a whole; and the overall lack of strategic approach to the siting of low-carbon infrastructure in order to minimise the impact on BMV land. The ES will need to address both the immediate impacts associated with the loss of BMV land and consider the wider cumulative implications for Lincolnshire and wider area.

Impact on Best and Most Versatile agricultural land, and food production

The PEIR states at paragraph 5.8.9 "Agricultural Land Classification" that "*The Provisional ALC mapping shows that the draft Order Limits largely comprise a mixture of Grade 1*

*(excellent quality agricultural land), Grade 2 (very good quality agricultural land), and Grade 3 (good to moderate quality agricultural land) land.".*

The Preliminary Assessment (PEIR 5.8.17 onwards) under each "section" of the scheme, states that *"The permanent loss of this land (assumed to be BMV land) is considered likely significant."*.

The Soils and Agriculture section (5.8) of the PEIR concludes (5.8.53) "*Construction of the whole Project would require the temporary loss of approximately 3,900 ha of land, some of which is considered likely to comprise BMV land, which is a significant effect. Most of this land, however, would be reinstated following construction and areas would be restored. Following construction, some of the land used for construction would be permanently lost due to the presence of the whole Project infrastructure (for example pylons and new substations), which is a significant effect*.".

By the project's own figures there will also be the temporary loss of more than 9,600 acres of land.

The route proposed in the consultation crosses land classified as "Best and Most Versatile" (BMV) agricultural land. This includes land owned by LCC as part of the County Farms Estate. This route includes highly productive agricultural land, and the proposals to construct pylons on this route would permanently prevent areas of this land from being used for agricultural purposes. If the scheme were to proceed as set out in the consultation, this would cause the loss of highly productive food producing agricultural land.

The guidance issued by Natural England (see: https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land ) highlights several government policies and legislation relevant to development proposals that affect agricultural land and soils. The policies and legislation aim to protect BMV agricultural land from significant, inappropriate or unsustainable development proposals.

The 25 Year Environment Plan "A Green Future: Our 25 Year Plan to Improve the Environment" (see: https://www.gov.uk/government/publications/25-year-environment-plan ) sets out the government's 25-year plan to improve the health of the environment by using natural resources more sustainably and efficiently. It plans to protect the best agricultural land.

The National Planning Policy Framework at section 15 Conserving and enhancing the natural environment "*Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.".*

Where it has not been possible to distinguish between Grade 3a and Grade 3b land, the NGET should undertake surveys to establish the correct categorisation of the land, so that the true impact on BMV land can be more fully understood.

The routing of the project should follow the NPPF guidance. As a first step it is necessary to demonstrate that this significant development of agricultural land is necessary. If that can be demonstrated that the route should cross areas of poorer quality land, rather than those of higher quality.

BMV land is a rare, valuable, and irreplaceable natural resource that should not be destroyed by this project. The land in this area contributes to significant food production, and losses of this national food security asset should be avoided.

The PEIR states that "*Aerial imagery and OS mapping indicate that the agricultural land use within the draft Order Limits is predominantly arable, with some grassland and woodland areas.*". This appears to be an understatement of the use of the high quality agricultural land for a wide range of food crops including field vegetables, potatoes, onions, sugar beet, and other root crops.

This route includes highly productive agricultural land, and this project would cause disruption to the use of the land for agricultural purposes and cause detriment to the productivity of the future use of this land for agricultural purposes. If the scheme were to proceed as proposed, this would cause damage to highly productive food producing agricultural land and it should be demonstrated how this can be avoided or mitigated.

There are also potential adverse impacts from dust or soils blowing from any construction working area or soil storage areas on to crops growing on nearby land. Where high value field vegetable crops are grown this could impact the quality of the crops, rendering them unmarketable.

<u>Agricultural Land Holdings and Interference with Agricultural Operations</u>
The PEIR states that "*The number of agricultural land holdings and the general land use across each section of the Project has been identified to inform the preliminary assessment. This does not, for the PEI Report, include an assessment of individual landholdings in terms of viability (such as disruption or proportion of landholding taken temporarily or permanently); an assessment will be presented in the ES based on the level of further information gained and with a focus on the permanent impacts and on any land uses which may be considered more sensitive (such as orchards, high value cropping systems or livery stables).*"

In addition to the land directly underneath the pylons, and that used for the foundations, which would be rendered impossible to farm, the location of a pylon within a field will cause disruption to agricultural operations in the vicinity of the pylon, reducing efficiency or rendering additional areas as unproductive. Again this impact is exacerbated on the rarer BMV soils where the farming is more likely to be more intensive.

On the LCC County Farms Estate, which is owned by the council and let as smallholdings under the Agriculture Act 1970, the holdings tend to be smaller than average for the locality. Therefore the impact of pylons located on these holdings is likely to be greater to the individual farmers concerned, that the impact would be for a farmer occupying a larger area. This may also apply to third party farmers occupying smaller areas. The project

should undertake an assessment of individual land holdings and the potential impact as a consequence of the proposals.

**Soils**

The PEIR states that "Available national soil survey mapping data indicates that the soils across all sections of the Project will be providing a range of soil functions, and as such are considered to have a range of sensitivities from very high to medium".

The Preliminary Assessment, under each "section" of the scheme, states that "…an impact of large magnitude on soil function and is considered likely significant.".

The consultation documentation states that "By the end of the construction phase, 2181.9 ha of BMV land would have been reinstated to its pre-construction condition through the implementation of effective soil handling, storage and reinstatement measures which will be detailed in an Outline Soil Management Plan (SMP) to be submitted as part of the DCO application."

This SMP will be a vitally important document from the point of view of ensuring that land is restored to the best possible agricultural productivity. It is essential that the handling of soils during construction and the restoration of land is undertaken with the greatest of care, to minimise any ongoing impact on agricultural production. This SMP must set out in detail how the stripping handling, storage, reinstatement, and restoration of land back to agricultural production will be undertaken, including how soil structure, fertility, and biology will be restored, and equally important how this will be monitored and verified.

It cannot be assumed that the land will easily be restored back to production, and any SMP must adequately consider the potential reduction of productivity over subsequent years, post restoration. Damage to the soil structure could take many years to remedy. There are numerous local examples of engineering schemes through Lincolnshire which have had longstanding adverse impacts that have failed to be mitigated adequately. To quote an example, LCC own land in Digby Fen, Lincolnshire, as part of the County Farms Estate where British Gas PLC laid the Hatton to Silk Willoughby line. Rights were granted for the scheme to be undertaken in 1994, yet 17 years later in 2011 problems were still being experienced with the standard of restoration. It was effectively determined that the damage to the soil structure, and fertility, was irreparable.

<u>Agricultural Land Drainage</u>

The agricultural land within the area crossed by the route is reliant on drainage by underground pipes. This drainage maintains the quality of the land and manages water levels to ensure agricultural productivity. This is generally highly productive land, but cannot be productively farmed without the benefit of good drainage.

The publication Soils and their Use in Eastern England (Hodge, C. A. H et al. Soil Survey Of England & Wales, 1984) gives commentary on the significance of land drainage commenting, "Its aims are to sustain or increase yields, improve management flexibility, reduce production costs and make farming more profitable." According to the Agriculture and

Horticulture Development Board (https://ahdb.org.uk/knowledge-library/field-drainage-benefits-and-costs-to-farm-businesses ) land drainage also has the potential to reduce flood risk, improve machinery efficiency, and improve soil structure.

There is the potential for existing field drainage systems to be damaged in the construction process, rendering them useless.

The location of pylons on this land significantly complicates the potential for future re-draining of the land, by adding a physical obstruction through which it would not be possible to lay a new drainage pipe. This is likely to have an adverse impact on the productivity of the land in question.

The impact on land drainage is covered in section 6 "Water Environment and Flood Risk" at section-level in PEI Report Volume 2 Part B Section 1-7. However, given the fundamental importance of this issue for the agricultural use of the land, the Council would expect to see mention of this in the Agriculture and Soils sections of the documentation, with details of how this issue will be identified and addressed with details of mitigation of the impact on agriculture.

Agri-environment Schemes and Natural Capital

The PEIR States that "*Agri Environment Schemes comprise government funding to farmers and land managers to support activities which improve the local environment. There are different levels of Environmental Stewardship Schemes which have increasing complexity and land management requirements across the Project.*"

The project should explain how the impact on these scheme is proposed to be mitigated.

Amenity of residential properties and the local rural area

The proposed route passed in the vicinity of a number of residential properties, including dwellings that are part of the LCC County Farms Estate. These are generally located in a sparsely populated rural area. The construction of tall pylons in an otherwise rural landscape has the potential to adversely impact the amenity of these dwellings and more generally adversely impact the local area.

Cumulative Impact

The proposed route follows a very similar route to the Triton Knoll Offshore Wind Farm onshore electrical infrastructure, and parts of the route are also in close proximity to other schemes such as the National Grid Viking Link, the Outer Dowsing Offshore Windfarm schemes, Eastern Green Links 3, Eastern Green Link 4, Eastern Green Link 5, and the Ossian Offshore Wind Farm scheme.

The impact of this proposal could be exacerbated by the cumulative impact when considered together with these schemes, and the cumulative impact in areas could be significant. Several farms within the County Farms Estate are crossed by multiple of these schemes, and several tenants occupy separate blocks of land which are crossed by more than one of the schemes. LCC is also aware of third party farmers who are similarly affected.

This will create an adverse cumulative impact on a local scale. It will also create a significant imposition on farmers who have to bear the brunt of a great deal of unwanted disruption and anxiety

This comes at time when farm incomes are under pressure, following adverse weather patterns and poor commodity prices, and the industry has also been impacted by adverse changes in Inheritance Tax and reductions in government agricultural policy direct payments. Hence, morale in the farming community is already low. These proposals will contribute to a further reduction in the wellbeing of the local farming community.

The routing should be chosen very carefully to minimise this impact.

**Ecology**

Introduction

The Grimsby to Walpole proposal consists of approximately 140 km of new overhead power lines between Grimsby and Walpole with up to six new 400 kV substations along the route. Replacement of some short sections of existing 400kV overhead line and local changes to lower voltage networks are also envisaged. The Applicant has produced the PEIR to allow consultees to provide input to the ongoing EIA process.

LCC has reviewed the following documents provided by the Applicant in relation to ecology:

- Volume 2 Part A Chapter 1: Introduction
- Volume 2 Part A Chapter 5: Project Description
- Volume 2 Part B Sections 1-7 Chapter 4: Ecology and Biodiversity and associated figures and appendices
- Volume 2 Part C Chapter 3: Ecology and Biodiversity
- Volume 2 Part C Chapter 10: Cumulative Effects and associated figures and appendix

Main overarching comments

The Applicant has undertaken a data search against records held in the Lincolnshire Environmental Records Centre hosted by the Greater Lincolnshire Nature Partnership and also used other online date resources. Sites protected or important at international, national and local levels appear to have been correctly identified. LCC agrees with the preliminary assessment of potential effects upon designated sites during construction and operation and maintenance.

LCC notes that field ecological surveys are ongoing and will be happy to provide further comments when the results of this ongoing work are available. LCC is of the opinion that the scope of work survey work undertaken to date and planned further work appears appropriate.

LCC welcomes the Applicant's commitment to the development mitigation and enhancement measures to various species and species groups but advises that the applicant

should ensure clarity around which measures are mitigation and which are genuine enhancement.

Whilst the delivery of a minimum of 10% BNG is not currently mandatory for NSIPs it is good practice and is likely to become mandatory before the DCO application is made. LCC welcomes the Applicant's commitment to delivering a minimum of 10% BNG across all its construction projects and to the development of a BNG Strategy to support the DCO submission (Volume 2, Part A, Chapter 1: Introduction: 1.9.4). LCC encourages the Applicant to maximise opportunities for the delivery of BNG and to seek to deliver significantly in excess of 10% given the scale of the proposed development.

Little information is currently presented about the detail of any ecological enhancement including opportunities for delivering BNG. LCC would welcome the opportunity to provide further input to options for the delivery of BNG including on the design and location of any new habitats to be established within the DCO boundary at the appropriate stage. LCC also encourages the Applicant to seek strategic opportunities to deliver BNG both with other National Grid projects in Lincolnshire and by working with other organisations and developers in the area.

Any commitments to the delivery of BNG submitted alongside the DCO application should be sufficiently detailed to give certainty as to the level of BNG that will be delivered if the applicant is seeking weight to be applied to this matter by the Examining Authority. Any gains in biodiversity and their monitoring and management will need to be appropriately secured in the DCO.

LCC advises that Biodiversity Opportunity Mapping has been produced by the Greater Lincolnshire Nature Partnership and a Local Nature Recovery Strategy for Greater Lincolnshire is currently being developed. These documents will provide useful guidance when considering opportunities to deliver BNG and the establishment of new habitats.

<u>Habitat and species comments</u>
Given that ecological survey work is still ongoing, the following comments should be taken as general comments on the current information presented across all sections rather than being specific to any particular section except where reference is made to a particular section(s).

- Botanical interest: LCC notes that data from any detailed botanical surveys is not included in the PEIR. The applicant should ensure that they have undertaken sufficiently detailed and appropriately timed botanical survey work to be confident that the presence of any scarce arable plant species occurring on the site is detected and to inform the calculation of the baseline biodiversity values.

- Ancient woodland: LCC advises that ancient woodland data for the county has recently been updated by the Greater Lincolnshire Nature Partnership. The Applicant may already have access to this data but should ensure that the most up to date information including from field surveys is being used to assess impacts.

- Aquatic habitats: LCC advises that there may be potential to work with Lincolnshire Chalk Streams Project (particularly in Sections 2 and 3) to identify opportunities for ecological mitigation and enhancement.

- Terrestrial invertebrates: LCC notes the Applicant's proposed approach to terrestrial invertebrates and agrees that this approach is appropriate. LCC advises that records obtained via record centre searches may be useful in aiding the design of ecological mitigation and enhancement measures to cater for the needs of any less common species.

Amphibians:
Great crested newt (GCN): LCC notes that GCN have currently been detected in Sections 2, 3, 4 and 6 with further surveys ongoing. LCC advises that District Level Licensing is not currently available in Lincolnshire and so a bespoke approach to GCN mitigation / compensation may need to be agreed with Natural England if impacts on the species are likely.

Natterjack toad: This species was previously confined to coastal sand dune habitats but is now thought to be expanding to more inland areas. This may be of relevance to Sections 2 and 3. LCC recommends further information on the species' current distribution is obtained from local Natural England and Lincolnshire Wildlife Trust officers who manage the Saltfleetby Theddlethorpe Dunes NNR.

Breeding and wintering birds: LCC advises that the applicant should ensure that surveys are designed to ensure that species whose breeding activity may not necessarily be encompassed within the scope of a standard breeding bird survey (e.g. due to the timing of their breeding activity) are accurately recorded. Relevant species will include but may not be limited to barn owl and quail.

LCC notes that surveys have detected the presence of populations of species listed on Schedule 1 of the Wildlife and Countryside Act in several sections. The presence of these species should be taken into account during construction to avoid offences potentially being committed.

LCC notes that surveys have detected the presence of a range of wintering bird species, which are likely to be associated with nearby designated sites. The applicant should ensure that sufficient data is available to understand the potential for impacts on wintering bird species including from collision risk and disturbance.

Bats: LCC notes that further surveys are planned to determine the level of bat activity and the presence of any roosts within the proposed boundary. The applicant should ensure that bat surveys are appropriately timed and detailed to ensure that impacts on bats can be properly assessed in the Environmental Statement.

Water vole: LCC notes the results of water vole surveys carried out to date and that further survey work will be carried out in 2025. LCC advises that there may be opportunities to

collaborate with ongoing work overseen by the Greater Lincolnshire Nature Partnership's "Operation Water Vole" project to deliver any necessary mitigation.

Invasive non-native species (INNS): LCC notes that measures is included in the Preliminary Code of Construction Practice to ensure that works to not inadvertently cause the spread of INNS.

Habitats Regulations Assessment (HRA): Given the presence of several Statutorily designated sites in the vicinity of the proposal, the Applicant will need to ensure that sufficient information has been gathered and submitted to allow HRAs to be undertaken.

Cumulative effects: There are several development proposals of varying scales in the vicinity of this proposal including other linear cable route and pipeline developments. These appear to have been correctly identified in Volume 2 Part C Chapter 10: Cumulative Effects and the associated figures and appendix. A detailed assessment of the cumulative impacts of these proposals on sensitive ecological receptors in the area should be undertaken in the Environmental Statement.

LCC's Infrastructure Ecologist will be happy to work with the Applicant, their consultants and other stakeholders throughout the EIA process to ensure that ecological elements of the application are properly addressed, and that scheme secures the maximum potential benefits for biodiversity.

**Socio-economic**

It is imperative that the applicant works with LCC as well as other relevant organisations to maximise the proportion of workforce sourced locally. Detailed plans and evidence of this should be provided as well as demonstration of collaboration with other projects and activities in the region. Any assumptions around workforce origins within the socio-economic assessment should reflect the impact of construction occurring alongside a large number of Nationally Significant Infrastructure Projects as well as consideration in the assessment of transport impacts.

LCC would wish to see plans to provide a detailed assessment of local economy and employment to be undertaken in Environmental Statement with final construction employment numbers, incorporating leakage, displacement and multiplier effects, including indirect and induced effects on the economy of the wider study area.

This is particularly important due to the large number of concurrent Nationally Significant Infrastructure Projects in the region. It is vital that the workforce assessment considers the different demands on the different phases of the project and assess these cumulatively with other potential major construction projects which will be occurring simultaneously. The Environmental Statement should consider the impact and opportunities the development may place on the local labour market. LCC would expect to receive detailed workforce information to facilitate regional coordination across Nationally Significant Infrastructure Projects, including a breakdown of the expected number and nature of employment opportunities during each phase of the development, as well as expected source of labour

(ie. local vs national). The applicant should relate this to the availability of labour in the area and identify how any mismatch between supply and demand will be addressed.

As part of future submissions, a workforce profile should be provided outlining:

a) Peak workforce numbers;
b) Average daily workforce numbers;
c) Broad competencies of workforce (i.e. civils, mechanical, electrical etc);
d) Anticipated split of home based and non-home based workforce;
e) These profiles will need to be set against the construction timeline.

LCC expects the applicant to:

a) Deliver and fund, in collaboration with LCC and local partners, activities that develop both local talent pools and local people so that they are enabled to take up opportunities of recruitment into skilled roles across the project;

b) Work collaboratively with LCC to ensure that where possible skills training, aimed at creating wider and deeper local talent pools from which to draw from, also has a long-term demand within the region thus ensuring a greater opportunity for sustainable employment;

c) Set an ambition for 5% of the roles required by the project to be filled through 'earn and learn' positions (the majority of which will be apprenticeships but may also include graduates on formalised training schemes and sponsored students as per the definition of the '5% club') including a commitment to a minimum number of apprenticeship opportunities to be provided to local people;

d) Create tangible mechanisms for ensuring that the skills base developed for the construction of the project is as transferable as possible to other key construction projects being delivered regionally;

e) Deliver activities with the aim to increase the size and diversity of the labour market pool;

f) Put into place clear plans (e.g., commitments within contracts) to drive the behaviours of their associated supply chain(s) to achieve skills and employment outcomes;

g) Incorporate social value measures within all activity and use as a tool to quantify the success of any and all interventions and to drive commitment and delivery of the associated supply chain to recruit locally and provide apprenticeship opportunities where feasible;

h) Clearly set out via a Skills Plan, incorporating, supply chain skills plans a strategic approach to developing and supporting the project's workforce requirements. The strategic approach should take into account each distinct phase of the project, feedback from employment monitoring measures and be reflective of Lincolnshire's economics, in particular local opportunity that meets skills legacy for the region;

i) Adopt and fund a dynamic approach to monitoring skills, employment and education outcomes and impacts that, through clearly identified governance, processes the use of all available evidence, local expertise to ensure home based worker targets are being met and programmes are in place to support/ensure local talent pools are available to combat any negative churn effects;

Temporary workforce

Table 7.14 of the PEIR suggests net jobs (so even allowing for leakage) to peak at 3,317, in the region, in 2031. The average jobs is 1,616 but, in 2030 and 2032, jobs are well above 2,000. This is a major influx of workers either residing (at least temporarily) in Lincolnshire or commuting to Lincolnshire. It is safe to assume that a significant proportion will be residing (at least temporarily) in Lincolnshire. This could have considerable effects in terms of:

- Demographic changes and potentially 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.

Visitor economy

Table 7.10 of the PEIR shows the significant value of day visits and overnight visits to the region's economy. The table (and it seems the chapter) does not show the significance of the visitor economy in terms of employment which, in 2023, for Greater Lincolnshire was estimated at 30,000 FTE jobs (www.greaterlincolnshirelep.co.uk/priorities-and-plans/sectors/visitor-economy/tourism/). Asides a few major tourist receptors, there appears to be no recognition in the PEIR of the potential impacts to the visitor economy as a whole but this could be significant in several ways, such as: with visual impact on settlements such as Boston, Louth, Mablethorpe and Skegness and PROW, highways, railways around the proposed line, for example, affecting the route to the coast, thus putting off visitors to the coast altogether.

It appears likely that both the construction and the operation phases of the transmission system will impact adversely on landscape and visual identity of the place, as well as on areas of BMV land. In turn these adverse impacts may affect Lincolnshire's emerging Green Tourism offer for visitors and cyclists, who are currently attracted by rural tranquillity of the place, and the quiet traffic free routes out to the National Nature Reserve on the coast, to walk on the beaches or along the National King Charles II National Coast Path, birdwatch or to see the important grey seal colony habitat, during the winter months at Donna Nook. NGET needs to fully assess the direct and indirect impacts of this project and its associated infrastructure on all of these known features and particularly the extent to which the physical infrastructure will impact and detract from the environmental quality of an area for

recreational activity. More broadly, it is also imperative that the project considers its part in the cumulative impact on the perception and propensity of people to visit the area during the construction period.

**Archaeology**

Welcome that the potential for direct significant effects on buried archaeological remains is recognized (Non-technical summary of the PEIR, section 5.5.41) and that the assessment will continue to be informed by the results of the ongoing and proposed evaluation activities and further design development (Volume 3 Part B Section 3 Chapter 5 Historic Environment – Appendices, section 5B.1.3).

For Lincolnshire, the baseline information from desk based sources has been completed with the exception of an aerial photo and LiDAR assessment which is currently being undertaken.

Geophysical survey has been partially undertaken along the route and during a recent meeting with the archaeological consultant there was confirmation that there was the intention to do the route entirely. This will be undertaken with a 70m width as well as 60x60 or 70x70 pylon base sites along with the proposed haul roads, ecological mitigation areas where ground impacts are proposed, and 45 areas of known archaeological potential.

It is understood that the first stage of geophysical survey will shortly be resumed with the aim of completion in November 2025, with Stage 2 geophysical survey and Stage 1 archaeological trial trenching also intended to be completed by Spring 2026.

The first stage of geophysical survey will shortly be resumed with the aim of completion in November, with Stage 2 geophysical survey and Stage 1 archaeological trial trenching also intended to be completed by Spring 2026.

Regarding the trial trenching scope the programme will be targeting substation sites, areas of known archaeological potential identified in the desk based work and geophysical survey results – including areas of impact pylon working areas, drainage basins, construction compounds and ecological and landscape mitigation areas as well as 3% trenching along the construction access haul road.

LCC notes the intended flexibility for how much evaluation is undertaken depending on the archaeological potential and nature and degree of the proposed impact and that there will be a further design phase which would allow the potential for archaeological mitigation by design informed by the results of the trenching.

LCC will continue to engage with the Applicant to ensure that the evaluation results inform a reasonable and competent agreed site-specific archaeological mitigation strategy to adequately deal with the impact of this development**.**

**Minerals and Waste**

LCC is the planning authority for minerals and waste planning matters within Lincolnshire as well for its own development which includes schools and some highways developments. The Development Plan for the area directly affected by the scheme includes the Lincolnshire Minerals & Waste Local Plan. The main concern in terms of minerals and waste development is the safeguarding of minerals resources and development and the safeguarding of waste development. The relevant policies for safeguarding are Policy M11 for Minerals and Policy W8 for Waste.

Minerals Site –

The safeguarded oil site, Keddington Oilwell, the proposed red-line boundary intersects with the edge of the site-specific MSA associated with this site (MWLP Policy M11). Further information is therefore required to demonstrate compliance with M11. Information should be provided to demonstrate that the proposed development would not prejudice or detrimentally impact upon the operation of the safeguarded site. Relevant issues to consider may include (but are not limited to):

- access and highways;
- health and safety (including fire safety);
- screening/boundary treatments;
- dust;
- site buffers; and
- the need to protect any associated utilities and infrastructure etc.

It is noted that the proposed overhead line cuts across the access road to Keddington Oilwell. In the spirit of the policy, this should be taken into consideration in terms of ensuring the site's operation isn't prejudiced by the proposals, particularly in terms of access for operations and in case of emergency. In doing so, the applicant should liaise with the site operator and with other stakeholders such as Lincolnshire Fire and Rescue.

In addition it is noted that there will be a significant need for minerals for the proposed construction works such as temporary construction access tracks, hardstanding areas for sub-stations etc. It would be helpful for the Minerals Planning Authority to know if this mineral is proposed to be sourced locally (within Lincolnshire) and the quantities required. Given that other infrastructure projects will also be constructing at a similar time and same geographical area this information will assist the Council to manage the need for future mineral production in the County as it reviews the Lincolnshire Minerals and Waste Local Plan.

Waste

Any impacts on these (and any other safeguarded waste facilities set out in the MWLP) should be given due consideration as the proposals are developed in accordance with policy W8 of the MWLP.

The principles for waste management for the proposed project and its construction phases are set out in the Code of Construction Practice (CoCP) which will in turn be informed by a Materials and Waste Management Plan (MWMP). Control and management measure GG21 of the Preliminary CoCP included within the PEIR appendices, requires that MWMP is developed prior to construction. The MWMP will include waste forecasts, and identification of recovery routes and will be updated during construction with actual waste figures. GG21 also includes control of earthworks and the movement of excavated materials (including re-use of excavated material).

4.3 The PEIR volume 2, part A, Chapter 5, paragraph 5.3.11 states that the MWMP will be required to identify appropriate waste facilities to dispose of materials. The Waste Planning Authority considers it important that in identifying these facilities the MWMP will need to assess the waste management capacity (for the waste types to be disposed) within the Planning Authority Areas that these facilities are located. Furthermore, the MWMP will need to carry out an assessment of the impacts of the volumes of disposed waste from the project on this capacity, and the significance of any loss of capacity.

**Lincolnshire Fire and Rescue (LFR)**

Having looked at the proposal there appears to be limited comment required from an LFR perspective at this stage. That said it is anticipated a need to ensure that LFR are kept abreast and involved in any traffic management plans that will impact flow or access to commercial or residential areas that pose a potential impact on LFR response standards (speed at which we are able to reach the address requiring our attendance). LFR would need to know where the sub-stations will be located so these can be captured the risk to ensure operational crews are aware of the details.

**Public Rights of Way (PRoW)**

Those PRoW that are potentially affected by this project are set out in a table attached to this response which also provides some general comments about the need to protect PROW during the construction phase and bespoke comments for each individual PRoW affected.

**Conclusion**

In summary LCC maintains its strong objection to the project that was set out in its non-statutory consultation response submitted last year for the following reasons:-

a) The Council's Energy Position Statement clearly sets out that the Council does not and will not support any project for overhead lines and pylons which impact on the County and its vitally important landscapes. Where such a need for grid infrastructure is justified this should be achieved using underground cabling;
b) The Council in this response has demonstrated that there is a viable alternative that has not been considered by NGET which would remove the need for any new grid infrastructure between Grimsby West Sub Station and the proposed Sub-Stations north-east of Alford. The connection between these 2 sub-stations and Weston Marsh could be secured using High Voltage Direct Current undergrounding;

c) To formally and strongly request that NGET pause this project until the Strategic Spatial Energy Plan is produced and incorporate the outcome and requirements of this Plan into the project. Also to provide time for effective evaluation of the alternatives that the Council is putting forward which would remove the need for a proportion of the proposed overhead lines and pylons in the most sensitive corridor of the proposed route adjacent to the eastern boundary of the Lincolnshire Wolds National Landscape;
d) Notwithstanding (c ) above to raise serious concerns regarding the landscape and visual impacts of the project around the section adjoining the Lincolnshire Wolds National Landscape but also in other sections due to the prematurity of the landscape and visual impact methodology used which seems to have been undertaken prior to the proposals provided in this consultation have been concluded resulting in mis informed viewpoint locations which were selected before the final details of the proposed infrastructure were known;
e) Raise concern about the loss of Best and Most Versatile (BMV) agriculture land and associated negative impacts on food security both from this project and cumulatively with the other NSIP projects in Lincolnshire that have already been approved by the Secretary of State and those projects that are emerging. The loss of agricultural land for solar and Battery Energy Storage Systems that are being granted under the Town and Country Planning Act also need to be factored into the continued erosion of BMV land in Lincolnshire;
f) The need for more in depth cumulative assessment, outcomes and mitigation on the inter-relationship of the proposed project and the other energy generation projects and associated infrastructures that are proposed to connect into this project and the various sub-station locations. In addition the cumulative impact from construction traffic not just from this project but those other NSIPs in the same location. Consideration needs to be given to an appropriate methodology for calculating the cumulative traffic impact assessment as further projects progress with additional traffic data and any updates to the construction programmes of other NSIPs in the area. The applicant is requested to set out further measures for both the local and regional level to demonstrate how it will manage cumulative traffic impacts for this development and those other emerging projects that have overlapping construction periods;
g) Provide detailed methodology as to how Lincolnshire can benefit from the electricity flowing through the County to support economic growth and residential development in areas which are currently compromised by lack of power to enable this growth; and
h) For a number of other topic areas highlighted above the submitted information does not address significant issues identified in the topic reviews. For the deficiencies highlighted in this response the Council expect that these be addressed in clearer assessments, outcomes and mitigation if any application is made to the Planning Inspectorate for this project.

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**
**Head of Planning**