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REF:-NMcB/CD/FC

06 March 2024

Whom it may concern,

National Grid Electricity Transmission– Non Statutory Consultation on Grimsbyto Walpole Overhead Transmission Lines and Associated Substation

The comments of Lincolnshire County Council set out in this letter follow the Executive meeting of the Council on 5th March 2024; who received a report in response to the non-statutory consultation by National Grid Electricity Transmission (NGET) upon the Grimsby to Walpole proposal, to provide a new 400KV overhead electricity transmission line and associated substations.

This representation sets out the **formal objection** of the County Council to the consultation. 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.

At its meeting on 9 January 2024 the Executive received a presentation by representatives of NGET on the forthcoming non-statutory consultation for the Grimsby to Walpole onshore overhead line proposal. At this meeting the Executive requested NGET to bring forth its business case and costing in line with Treasury Green book principles for each of the 3 options referred to in the consultation document. At the time of writing, this consultation response has still not been received.

The Council notes that the Grimsby to Walpole proposals are part of a scheme to upgrade the electricity network and infrastructure known as 'The Great Grid Upgrade' and developed by NGET. 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 available at this time to assess the environmental impacts of the proposal.

It is noted that in addition to the overhead lines five substations are also proposed as follows:-

- One substation, to be located in the vicinity of the existing Grimsby West substation, to replace the existing substation and to connect three solar energy/battery storage projects, plus two additional supergrid transformers for Northern Powergrid.
- Two connection substations south west of Mablethorpe and north-east of Alford, to facilitate the connection of planned offshore wind generation, interconnectors with other countries and a subsea link from Scotland.
- One substation near existing overhead lines at Weston Marsh, north east of Spalding, to connect an offshore windfarm and two solar energy/battery storage projects.
- One substation in the vicinity of the existing Walpole substation, to connect proposed subsea links from Scotland and a combined cycle gas turbine power station.

It is disappointing that at this stage, 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 additional onshore infrastructure that each of these energy projects will require. The cumulative impact from the overhead lines pylons, NGET substations and those substations that will be required for the other energy projects, would overwhelm the community of Alford, and have the potential to significantly adversely impact on the character and appearance of the Lincolnshire Wolds Area of Outstanding Natural Beauty.

It is of great concern to the Council that the Strategic Options report, that is part of the consultation documents, is flimsy in detail without any clear basis of methodology for the costs benefits analysis of the different options, or how the conclusions were reached to adopt the overhead lines proposal and discount the other options.

The Council questions why the subsea option has been discounted on an economic perspective, on the basis that it would be significantly more expensive to both build and maintain over a 40-year period. The Council requests that the details of how this conclusion was reached is provided as a matter of urgency; and is why the Executive **requested the business case and financial assessment** based on Treasury Green Book principles for all options during the presentation on 9th January. As previously highlighted, to date no such detail has been provided.

Whilst it is acknowledged that the various options that have been provided in the strategic options report is helpful in setting out National Grid's position, it is considered essential that a more comprehensive and cohesive evidence base is provided to the Council and the communities that it represents, to show that other options such as the reinforcement of existing Grid infrastructure, an off-shore subsea connection or underground cables are not feasible or desirable alternative.

The strategic report includes 2 off-shore, subsea options from the Grimsby sub-station; one of these involves a proportion of the cable being off-shore and making landfall around the Anderby Creek area and then following an on-shore route to Walpole. The other option is for a subsea cable from Grimsby to the Norfolk Coastline involving 190km of cable, without the need for the on-shore infrastructure, but would involve landfall in the Wash Estuary on the Norfolk coastline line impacting on sensitive nature conservation areas.

The onshore option that is proposed has a capital cost estimate (including substations) of £1,074 million, compared to £4,391.7 million for an equivalent subsea option (including substations). This costing has no regard to the compensation required for the loss of tourism and property prices; and the Council will want to have assurance that the same approach has been taken for both options. For instance, does the onshore option include the costings for the connection infrastructure of prospective energy projects which it is understood the subsea option does?

Whilst the strategic option report is helpful in allowing a partial understanding of how the various options have been considered, it is not helpful in setting out the reasons for dismissing the subsea option, other than on purely cost grounds but without detailed investigation of technical, environmental and socio-economic criteria being undertaken.

The Council will pursue rigorously the subsea option and NGET should be aware that fundamentally this is the only correct approach. It is the Council view that there is no mitigation possible that can manage the unacceptable impact of overhead lines and associated infrastructure on the natural and historic landscape of the east of the County. There are numerous planning decisions by Planning Inspectors going back many years that clearly indicate that tall vertical structures in flat open landscape can never be justified due to the scale of impact on the landscape over a very wide area.

In addition, the Council is confused as to why NGET did not propose the shorter **T-pylon** design for the project as a whole and would be grateful for NGET explanation for this. T-pylons have a precedent in being used in other projects.

Substations– 3 substations are proposed in Lincolnshire 2 between Mablethorpe and Alford and one to the north-east of Spalding. The substations provide a means of connection for multiple energy projects some from the local area and others from much further afield such as Scotland which involve the use of subsea cables for up to 500km

The Council would like NGET to provide an explanation as why it is cost effective for a 500km subsea cable to be used to the Lincolnshire coast from Aberdeenshire, and why is it not possible to extend such cables via a subsea option for a further 200km to make landfall at Tilbury?

Whilst details are still to emerge of the necessary infrastructure for these substations it must be questioned if any mitigation and screening can be effective in such an unspoilt landscape that currently exist in the areas of search. This is exacerbated by the very fact of the purpose of these substations is to provide connection points, for other energy projects, which in many cases will require their own substations, and therefore the cumulative impacts from these additional infrastructure needs to be taken into account, in both the construction and operation of the other substations that will need to be developed in proximity to the NGET substations.

It is considered essential that NGET commit to producing a masterplan of the substation areas; to consider not only the NGET substations, but also the other substations from other energy companies that will be necessary so that this can be considered holistically, rather

than in an unplanned incremental approach as developers bring their proposals forward at some future date.

Due to the lack of detail at this stage it is not possible to provide any specific technical response to the proposals, as significant amount of background and environmental information remains to be presented at later stages as the project evolves. When this information is presented at future consultation phases the Council will in due course provide specific technical comments in the following areas:-

- Cultural heritage including archaeology and historic environment.
- Ecology.
- Economic Development.
- Emergency Planning/Fire and Rescue.
- Highways and transport.
- Landscape and Visual impact.
- Lead Local Flood Authority and Flood advice.
- Public Health.
- Public Rights of Way.
- Soils and Agriculture.
- Waste and Minerals Planning Authority.

At this stage in the process, however, the Council wish to make it fundamentally clear that from information provided, and the initial public reaction to the proposal, that the scheme will have the potential to have significant impact on large swathes of the landscape of the area when viewed from both distance, and locally in relation to the Fens and the impact on and from the AONB. The loss of best and most versatile agricultural land which is critical to national food security has also been given no consideration.

The Council wish to draw NGET 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.

Also, in close proximity the Lincolnshire coast, forms part of the East Atlantic Flyway and is registered as one of the seven sites in the UK on the tentative list for UNESCO World Heritage site status. These sites include some of the country's most valuable natural areas and are recognised for being of Outstanding Universal Value for their global significance to nature conservation. The East Coast Wetlands are a nationally and internationally recognised habitat for waterbird populations, with 29 species found in internationally important numbers across 21 existing Special Protection Areas (SPAs) including, in Lincolnshire; The Humber Estuary, The Wash and Gibraltar Point.

Energy Infrastructure Position Statement

On 5 December 2023 the Council adopted an Energy Infrastructure Position Statement 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.

However, taking into account the Council's recently adopted Energy Infrastructure Position Statement the Council's clear preference is for a coordinated, offshore centred approach, delivered at pace, to minimise onshore infrastructure in Lincolnshire. If this approach can deliver an alternative to the current onshore proposals in a timely manner, without risking wider Net Zero, renewable generation, and decarbonisation targets, it would be welcomed by the Council and the communities it represents.

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.

The Council reiterates the need for NGET to supply the full business cases and costings that have been mentioned in the consultation document. NGET should provide this information to the wider public as soon as possible in advance of the next round of consultation.

The Council will be commissioning its own independent review of the strategic options appraisal, and this report when available, will be presented to support the Council's case that alternative options have been dismissed on the basis of cost alone without detailed investigation of technical, environment and socio-economic criteria being undertaken.

For the reasons set out above, the Council is left with no option but to formally **object** to the proposals as currently presented, and would request that further work is done to demonstrate in a sequential approach and recognising that the Council will never support overhead pylons and the alternatives in order of preference are:-

- Considers alternative reinforcement to the existing National Grid infrastructure.
- Subsea option.
- Underground cabling.

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 do not hesitate to contact Neil McBride, Head of Planning (Neil.McBride@lincolnshire.gov.uk).

Yours sincerely



Councillor Martin Hill OBE
Leader, Lincolnshire County Council
Chairman of the Executive Board



Councillor Colin Davie
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Cllr Anne Dorrian, Leader of Boston Borough Council

Cllr Nick Worth, Leader of South Holland District Council

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Mark McAllister, Chair of Ofgem

No Pylons Lincolnshire

Paul Learoyd, Chief Executive of Lincolnshire Wildlife Trust