



The Planning Inspectorate
Yr Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Grimsby to Walpole Project

Case Reference: EN020036

Adopted by the Planning Inspectorate (on behalf of the Secretary of State)
pursuant to Regulation 10 of The Infrastructure Planning (Environmental
Impact Assessment) Regulations 2017

10 September 2024

TABLE OF CONTENTS

1.	INTRODUCTION.....	1
2.	OVERARCHING COMMENTS.....	3
2.1	Description of the Proposed Development.....	3
2.2	EIA Methodology and Scope of Assessment	6
3.	ENVIRONMENTAL ASPECT COMMENTS.....	10
3.1	Landscape.....	10
3.2	Visual	15
3.3	Ecology and Biodiversity	19
3.4	Historic Environment	24
3.5	Water Environment.....	26
3.6	Geology and Hydrogeology.....	29
3.7	Agriculture and Soils	32
3.8	Transport and Movement	35
3.9	Air Quality.....	38
3.10	Noise and Vibration	40
3.11	Socio-economics, Recreation and Tourism.....	42
3.12	Health and Wellbeing	46
3.13	Climate Change.....	49
3.14	Major Accidents and Disaster.....	51
APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED		
APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES		

1. INTRODUCTION

- 1.0.1 On 02 August 2024, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from National Grid Electricity Transmission plc (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Grimsby to Walpole project (the Proposed Development). The Applicant notified the Secretary of State (SoS) under Regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development and by virtue of Regulation 6(2)(a), the Proposed Development is 'EIA development'.
- 1.0.2 The Applicant provided the necessary information to inform a request under EIA Regulation 10(3) in the form of a Scoping Report, available from:

<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN020036/documents>
- 1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the Proposed Development as currently described by the Applicant. This Opinion should be read in conjunction with the Applicant's Scoping Report.
- 1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in Appendix 1 in accordance with EIA Regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in Appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 1.0.6 The Inspectorate has published a series of advice notes on the National Infrastructure Planning website, including [Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#). AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.
- 1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

<https://www.gov.uk/government/collections/national-infrastructure-planning-advice-notes>

- 1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Volume 1 - Chapter 4)

ID	Ref	Description	Inspectorate's comments
21.1	Section 4.7	Flexibility – pylons	<p>The Scoping Report refers to the potential use of alternative pylon designs (T pylons/ low height steel lattice pylons) as an embedded design measure. The pylon designs should be confirmed in the ES and committed to through the draft DCO (dDCO).</p> <p>The ES should provide dimensions of the pylons to be constructed. This should include maximum heights and widths of the steel work itself, along with details of the foundations that would be required at each pylon location.</p> <p>The Inspectorate acknowledges that some flexibility may be required for micro-siting of pylons but would expect the proposed locations to be identified within the ES along with any Limits of Deviation (LoD) required (both laterally and vertically, i.e. in terms of the depths of foundations).</p>
212	Section 4.7	Flexibility - substations	<p>The Scoping Report describes both air insulated or gas insulated substations and notes that the land use requirements differ for each type. The Applicant should make every effort to finalise the type(s) of substations to be constructed. Should this not be possible, a worst case scenario should be described and adopted in the assessment of likely significant effects.</p>
213	Section 4.7	Landscaping	<p>Section 4.7 makes brief reference to potential landscaping. The ES should identify all proposed landscaping and confirm whether any is relied upon to mitigate potentially significant landscape and/or visual effects.</p> <p>The Applicant should seek to agree the location and types of planting with relevant consultation bodies. The ES should explain and justify the assumptions made in respect of the growth rates of planting proposed to mitigation effects.</p>

ID	Ref	Description	Inspectorate's comments
214	Section 4.8	Vegetation clearance	<p>The ES should identify where vegetation clearance is required, including the felling of trees. The Inspectorate acknowledges that some flexibility may be required for micro-siting of pylons but would expect the ES to provide clarity on the maximum extent of tree loss and demonstration that the design has sought to avoid or minimise loss of high grade trees.</p> <p>Should any particular pockets of existing vegetation be relied upon to screen any parts of the Proposed Development, the Inspectorate expects their retention to be demonstrably secured.</p>
215	Section 4.8	Access tracks	<p>The locations of and types of any culverts/temporary bridges required along the access tracks should also be identified.</p> <p>The ES should confirm whether any access tracks would be left in situ for use during maintenance activities, and if so, identify their locations. Proposed finished levels of any permanent access roads AOD should be identified within the ES (along with any necessary LoDs).</p>
216	Para 4.8.42	Underground cables	<p>In the main, the Scoping Report describes the Proposed Development as comprising an overhead line. However, paragraph 4.8.42 identifies the potential for underground cables using trenchless installation techniques such as Horizontal Directional Drilling (HDD). Should HDD form part of the Proposed Development, all associated infrastructure should be clearly detailed and any likely significant effects from their construction and operation assessed within the ES.</p>
217	Section 4.10	Maintenance	<p>The ES should detail the assumptions made in the assessment in terms of, inter alia, the frequency and duration of maintenance activities, the likely locations of maintenance works and anticipated traffic movements.</p>
218	Paras 6.7.3 and 7.7.4	Temporary pylons	<p>Paragraphs 6.7.3 and 7.7.4 refer to the construction and removal of temporary pylons; these have not been mentioned elsewhere in the Scoping Report. If required as part of the Proposed Development, these should be detailed within the project description in the ES.</p>

ID	Ref	Description	Inspectorate's comments
21.9	Para 16.9.4	Employment	The ES should set out the expected number and nature of employment opportunities during each phase of the Proposed Development. This should be described in the context of the workforce availability in the area at a time when numerous other major projects are anticipated to be constructed. The ES should detail how any mismatch between supply and demand will be addressed and consider the origins of its workforce in all relevant aspect assessments (notably socio economics and traffic and transport). All assumptions made in this regard should be set out in the ES.
21.10	n/a	Piling	The Scoping Report makes brief references to piling at paragraphs 6.9.5, 7.9.5, 11.7.4 and 12.6.4 and Tables 15.2 and 20.10. The ES should identify the construction methods to be used and ensure they are reflected across the assessment of effects within the ES, in particular the noise and vibration assessment.
21.11	n/a	Construction hours	The ES should provide details of the anticipated construction working hours on which the assessment of likely significant effects has been based (including any night-time working required, as indicated in Tables 6.3, 7.3 and 20.10). This should be consistent with the working hours specified in the draft Development Consent Order (dDCO).
21.12	n/a	Lighting	The proposed lighting for all phases of the Proposed Development should be described within the ES.
21.13	n/a	Vehicle movements	The number of vehicle movements is key to a number of environmental aspect assessments. The ES should detail the number of anticipated vehicle movements during all phases of the Proposed Development and explain the assumptions upon which these have been established.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Volume 1 – Chapter 5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
221	Paras 5.3.12 - 5.3.13	Decommissioning	<p>The Applicant proposes to scope decommissioning out of the assessment (except the decommissioning works proposed at the existing Grimsby West Substation (in part, or in full) as part of the construction phase of the Project).</p> <p>The Scoping Report anticipates that the transmission of electricity would continue for as long as there is a business case for doing so and states that decommissioning would be subject to separate consenting procedures.</p> <p>The Inspectorate agrees that decommissioning can be scoped out of the ES on that basis that a high-level summary of potential effects for each environmental topic is provided within the ES. The Inspectorate expects this to include a description of likely methods for decommissioning.</p>

ID	Ref	Description	Inspectorate's comments
222	Chapter 3	Alternatives	<p>Paragraph 3.4.5 of the Scoping Report explains that the Strategic Options Report (SOR) considered onshore and offshore options, the latter of which was discounted due to cost. Paragraph 3.4.6 proceeds to explain that a new primarily overhead line connection was the emerging preference, with no explanation as to why an underground cable was discounted. The ES should provide this detail.</p>

ID	Ref	Description	Inspectorate's comments
223	Para 4.6.7	LoDs	The Inspectorate acknowledges the need for the proposed LoDs. These should be clearly detailed within the ES. All surveys and assessments should be of sufficient spatial scale to incorporate any LoD for all elements of the Proposed Development.
224	Para 4.6.14	Construction Traffic Management Plan (CTMP)	<p>Paragraph 4.6.14 states that commitments regarding the use of electric vehicles or vehicles conforming with emission standards ratings are included in TTO1 and TTO2 in Appendix 4A Initial Outline Code of Construction Practice (CoCP). However, these specific commitments are not included in the Outline CoCP as stated. The Scoping Report also includes several further incorrect references to commitments in the outline CoCP.</p> <p>The Inspectorate acknowledges the Outline CoCP is currently in draft form, however the Applicant should ensure that all measures stated to be included within management documents are included where stated in the final application versions.</p>
225	Paras 5.3.15 & 12.7.6	Duration of effects	<p>The Scoping Report proposes to assess effects during the phase within which the impact arises. The Scoping Report acknowledges there would be some permanent loss of habitats and agricultural land from the Proposed Development. These impacts would first arise and therefore be assessed during the construction phase.</p> <p>The Applicant should ensure that assessing such impacts solely during the construction phase does not underplay the potential duration and consequently, the significance of effect.</p> <p>The ES should clearly differentiate between habitat and agricultural land to be lost temporarily (ie to be reinstated) and that to be permanently lost.</p>
226	Image 5.3	Significance of effect	Image 5.3 shows that up to three levels of significance is possible when combining a given value/sensitivity of receptor and a given impact magnitude. For example, a very high value/sensitivity of receptor combined with a small magnitude of impact results in an effect which could be of major, moderate or minor significance. This approach is echoed for some aspects (see Tables 12.9, 13.6, 16.19 and 17.12), but not for all. Where this approach is to be employed, the ES should clearly detail how the final level of significance

ID	Ref	Description	Inspectorate's comments
			<p>has been determined and provide justification for not adopting the worst case level of significance from the options available.</p> <p>Where professional judgement is used to determine whether an identified effect is significant or not significant, this decision should be supported by clear reasons and evidence and make reference to any relevant guidance.</p>
227	n/a	Land access	<p>The Inspectorate acknowledges the large scale of the Proposed Development and the high level of survey effort that will be required to characterise the baseline environment. Should any parts of the study area not be accessible for surveys, the ES should identify such limitations and detail the assumptions made in the assessments.</p>
228	n/a	Residues and emissions	<p>The ES should provide an estimate, by type and quantity, of anticipated residues and emissions resulting from construction and operation of the Proposed Development, as required by Schedule 4(1)(d) of the EIA Regulations 2017.</p>
229	Section 5.5	Cumulative assessments	<p>The Inspectorate appreciates that the projects for inclusion within the cumulative effects assessment are yet to be determined.</p> <p>Given the location of the Proposed Development and proximity to other approved, known and emerging NSIPs, the Applicant should ensure that the geographical scope is sufficient to capture inter-project effects. The Inspectorate notes the comments of North Lincolnshire County Council's in respect of giving further consideration to the Zone of Influence (ZoI) for Traffic and Movement, Agriculture and Soils and Health and Wellbeing. The Applicant should seek to agree the Zols and the list of projects to be included within the assessment with relevant consultation bodies.</p> <p>The ES should include an appropriate figure clearly depicting the locations and extent of projects included in the CEA in relation to the location of the Proposed Development</p>
2210	n/a	Transboundary	<p>Any likely significant transboundary effects should be assessed within the ES.</p> <p>Following the adoption of this Scoping Opinion, the Inspectorate will undertake a transboundary screening, on behalf of the Secretary of State, under Regulation 32 of the</p>

ID	Ref	Description	Inspectorate's comments
			2017 EIA Regulations. The Secretary of State's duty under Regulation 32 continues throughout the application process.
2211	n/a	CoCP	The ES has, in some circumstance, relied on measures within the CoCP for the operational or maintenance phases. Given that a CoCP is prepared and implemented for the construction phase, the Applicant should ensure that any measures required for the operational or maintenance phases are secured through an equivalent plan for those phases of development.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Landscape

(Scoping Report Volume 1 – Chapter 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
31.1	Para 6.5.36	Lincolnshire Wolds National Landscape – direct effects	The Scoping Report proposes to exclude consideration of direct effects on the landscape of the Lincolnshire Wolds National Landscape (with the exception of any effects arising from temporary access routes) as no above ground infrastructure would fall within the designated area. The Inspectorate agrees that significant direct effects are likely and that this matter can be scoped out of the ES on the basis that the ES assesses potential direct impacts from the temporary access routes.
31.2	Para 6.5.39 and Tables 6.2 & 6.3	Proposed Lincolnshire Wolds National Landscape extension	On the basis that the proposed extension has no formal status and lies outside the Scoping Boundary, the Inspectorate agrees this matter can be scoped out of the assessment. However, the Inspectorate welcomes that this will be kept under review should the situation change.
31.3	Para 6.5.40 and Tables 6.2 & 6.3	North Norfolk National Landscape	The Inspectorate agrees that significant effects on the North Norfolk National Landscape are unlikely given the distance from the Scoping Boundary (14km) and that this matter can be scoped out of the assessment for all phases of the Proposed Development.
31.4	Para 6.5.41 and Table 6.3	Areas of Great Landscape Value (AGLV) – direct effects	The Inspectorate agrees that direct effects on AGLVs can be scoped out of the assessment for all phases of the Proposed Development on the basis that none are located within the Scoping Boundary. For clarity, the Inspectorate agrees with the proposal to assess indirect effects.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
315	Para 6.5.52 and Tables 6.2 & 6.3	North East Lincolnshire Landscape Character Types (LCT) 1: Industrial Landscape (Humber Estuary LCA)	The Inspectorate agrees that given the nature of LCT 1 (Industrial Landscapes), significant effects are unlikely and that this matter can be scoped out of the assessment for all phases of the Proposed Development.
316	Table 6.2 & 6.3	North East Lincolnshire LCT 5: Sloping Farmland and LCT 6: High Farmland (construction)	<p>Paragraph 6.5.51, 6.5.55 and identify the potential for indirect effects to LCT 5, LCT 6, RLCT 7B and LCA D2. Tables 6.2 and 6.3 scope in operational phase effects on these receptors, but scope out construction phase effects.</p> <p>Paragraph 6.9.5 states that <i>“tall construction plant (for example tower cranes and piling rigs) rarely gives rise to significant landscape effects as it is present at each pylon location for a short period of time.”</i> However, the Scoping Report does propose to assess construction phase effects for other LCTs, RLCTs and LCAs.</p>
317		East Midlands Regional Landscape Character Types (RLCT) 7B: Wolds Scarps, Ridges and Valleys (construction)	In the absence of a justification for scoping out construction phase effects on these particular receptors, the Inspectorate does not agree this matter can be scoped out. The potential for indirect effects during the construction phase should be assessed within the ES, where significant effects are likely.
318		Kings Lynn and West Norfolk LCA D2: Walpole, Terrington and Clench Warton (construction)	

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
31.9	Para 6.5.56 and Tables 6.2 & 6.3	East Midlands RLCTs 1A, 1B, 1C, 1E and 4B	<p>The RLCT's are as follows:</p> <ul style="list-style-type: none"> • RLCT 1A: Coastal Saltmarshes and Mudflats; • RCLT 1B: Coastal Dunes, Beach and Intertidal Sand Flats; • RLCT 1C: Shallow Coastal Waters; • RLCT 1E: Offshore Industries, Fisheries and Navigations; and • RLCT 4B: Wooded Vales; <p>The Inspectorate agrees that, given the nature of RLCTs 1A, 1B, 1C and 1E, significant effects are unlikely during all phases of the Proposed Development and that these receptors can be scoped out of the assessment.</p> <p>The Inspectorate also agrees that given the very minimal overlap of RLCT 4B and the study area, significant effects are unlikely to occur and that this matter can be scoped out.</p>
31.10	Para 6.5.61 and Tables 6.2 & 6.3	Kings Lynn and West Norfolk Landscape Character Assessment (LCA) E4: Marshland St. Jame	<p>The Inspectorate agrees that significant effects on the LCA are unlikely given the distance from the Scoping Boundary and that this matter can be scoped out of the assessment for all phases of the Proposed Development.</p>
31.11	Tables 6.2 & 6.3	Maintenance phase effects on all receptors	<p>The Inspectorate agrees that significant effects are unlikely during the maintenance phase and that this matter can be scoped out of the assessment for all impacts and receptors.</p>
31.12	Tables 6.2 & 6.3	Localised widening of public highways – operational phase	<p>On the basis that roadside vegetation lost during widening works would be reinstated like for like, the Inspectorate agrees that significant effects are unlikely. This matter can</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			therefore be scoped out of the ES, however the Inspectorate expects to see a clear commitment secured for all proposed reinstatement.

ID	Ref	Description	Inspectorate's comments
3.1.13	Section 6.4	Study area	<p>The Scoping Report states that an initial field survey determined that existing pylons at distances between 1km and 3km are typically noticeable but not prominent. It therefore concludes that significant effects are most likely to occur to receptors within 3km. No evidence has been provided to support this statement and it is not known if the height of the existing pylons referred to reflects that of the proposed pylons.</p> <p>The study area should take into account theoretical visibility identified in the proposed Zone of Theoretical Visibility (ZTV) maps to identify any locations outside of the 3km study area which could potentially experience significant effects.</p>
3.1.14	Para 6.4.7	ZTV	Paragraph 6.4.7 states that ZTV maps would be produced for pylon routes. ZTV analysis should also be undertaken for the maximum foreseeable parameters of development within substation compounds. The parameters used to inform the ZTVs should be provided.
3.1.15	Para 6.6.6	Landscape and Ecological Management Plan (LEMP)	The Outline CoCP contains a commitment to produce a LEMP prior to construction, which would detail landscape planting and habitat creation. Should such planting be relied upon to mitigate effects, an outline LEMP should be provided with the application.
3.1.16	Section 6.7	Part decommissioning of the existing Grimsby West Substation	Part decommissioning of the existing Grimsby West Substation is identified as a potential source of construction impact in paragraph 6.7.3, however there is no further mention of this activity in Table 6.2. For the avoidance of doubt, the potential for impacts to arise from this activity should be assessed, where significant effects are likely to occur.

ID	Ref	Description	Inspectorate's comments
3.1.17	Para 7A.4.13 of Appendix 7A	Sequential effects	Sequential effects are briefly mentioned in a broad context in Appendix 7A of the Scoping Report (LVIA Methodology), but there is no specific reference to any assessment methodology for this matter. Given the scale and repetitive nature of the Proposed Development, combined with varying visibility of pylons, this is likely to be an important matter for users of Public Rights of Way (PRoW) networks and should be addressed in the ES.

3.2 Visual

(Scoping Report Volume 1 – Chapter 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
321	Tables 7.2 & 7.3	Receptors further than 10km from the Scoping Boundary and outside the ZTV – construction and operation	<p>The Inspectorate considers that the study area and ZTV should represent the extent of the likely impacts from all phases of the Proposed Development. The Inspectorate considers that a blanket 10km rule is premature at this stage until the ZTV has confirmed the potential visibility. The Applicant should make effort to agree the methodology for the ZTV with relevant consultation bodies including local authorities.</p> <p>The Inspectorate agrees that any impacts on visual receptors located outside of the ZTV, once ground-truthed by field work, are unlikely to result in significant effects and can be scoped out of the ES.</p>
322	Tables 7.2 & 7.3	People living and moving around communities and engaging in recreational activities including people using local roads, PRow and waterways (beyond 3 km of the Project) – construction, operation and maintenance	<p>The Inspectorate has provided comment on the proposed 3km study area at ID 3.1.13. On the basis that the ZTV does not identify receptors outside of the 3km that could be significantly affected, the Inspectorate agrees this matter can be scoped out of the ES.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
323	Tables 7.2 & 7.3	People using National Trails and regionally promoted routes (beyond 3 km) (construction, operation and maintenance)	
324	Tables 7.2 & 7.3 and Appendix 7A	Occupants of individual selected properties within 400m (construction and maintenance)	Table 7.2 proposes to scope in construction phase effects on occupants of individual properties, however this matter is proposed to be scoped out in Table 7.3. For the avoidance of doubt, the Inspectorate considers this matter should be scoped in where there is the potential for Residential Visual Amenity Effects.
325	Table 7.3 and Appendix 7A	Occupants of individual properties beyond 150m (construction, operation and maintenance)	The Inspectorate notes that the 150m study area proposed accords with the Landscape Institute (LI) published the Residential Visual Amenity Assessment (RVAA) guidance methodology. The Inspectorate agrees that this matter can be scoped out of the ES.
326	Tables 7.2 & 7.3	Main road and rail users (unless recognised as a scenic or tourist route) (construction, operation and maintenance)	The Inspectorate agrees that any visual impacts on main road and rail users are not anticipated to experience significant effects because of the glimpsed nature of the views. This matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
327	Tables 7.2 & 7.3	Localised widening of public highways (operation and maintenance)	On the basis that roadside vegetation lost during widening works would be reinstated like for like, the Inspectorate agrees that significant effects are unlikely. This matter can be scoped out of the ES. The Inspectorate expects to see a clear commitment secured for all proposed reinstatement.
328	Tables 7.2 & 7.3	Periodic vehicle/ helicopter/ drone access for routine maintenance and emergency repairs (maintenance) (all receptors)	The Inspectorate agrees that significant effects are unlikely during the maintenance phase and that this matter can be scoped out of the ES.
329	Tables 7.2 & 7.3	General maintenance activities including cutting back of vegetation along wayleave corridor to ensure safety clearances (all receptors)	The Inspectorate agrees that significant effects are unlikely during the maintenance phase and that this matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3210	Para 7.8.7	Residential amenity	A 400m study area is proposed for the RVAA. The Applicant should also consider the potential for impacts on properties beyond this distance should they have potentially clear, open and direct views of the scheme, particularly of larger elements such as the sub-stations.

ID	Ref	Description	Inspectorate's comments
3211	n/a	Overlap with landscape assessment	<p>The Inspectorate's comments on the proposed landscape assessment at ID's 3.1.13 to 3.1.17 of this Scoping Opinion apply equally to the proposed visual assessment.</p> <p>The Inspectorate has identified a high degree of duplication between the Visual and Landscape chapters and appendices of the Scoping Report. Given the inherent overlap between the visual assessment and the landscape assessment, the Inspectorate recommends that consideration be given as to how repetition between these ES chapters can be kept to a minimum.</p>
3212	n/a	Impacts on canals and waterways	<p>Consideration should be given to the potential for likely significant effects from the visual impact of cable crossings of the canal network, including at the crossing location on the River Witham and where the landscape does not provide for easy visual mitigation of the works. This should include the impacts of lighting near to the canal and waterway, including the potential for distracting boaters at dusk. The ES should identify any specific mitigation which may be required.</p>

3.3 Ecology and Biodiversity

(Scoping Report Volume 1 – Chapter 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
331	Para 8.5.47	Hazel dormouse surveys	The Inspectorate agrees that hazel dormouse can be scoped out of the assessment on the basis that there are no records of the receptor within the study area and as the scoping boundary lies beyond the species' known distribution.
332	Para 8.5.50	High brown fritillary (<i>Fabriciana adippe</i>), pearl-bordered fritillary (<i>Boloria euphrosyne</i>) and marsh fritillary (<i>Euphydryas aurinia</i>)	On the basis that the records of these species being present within the Scoping Boundary are over 80 years old, the Inspectorate agrees High brown fritillary, pearl-bordered fritillary and marsh fritillary can be scoped out of the ES. However, should these species be identified during further site surveys, the potential for significant effects should be reconsidered.
333	Tables 8.4 & 8.7	Statutory and non-statutory designated sites (without mobile qualifying criteria) located greater than 2km from the Scoping Boundary	The Inspectorate agrees that the distance separating these sites from the Proposed Development would result in significant effects being unlikely. As such, this matter can be scoped out of the ES.
334	Table 8.4	Invertebrates – incidental (direct) mortality for all phases	The Applicant proposes to scope out this matter for all phases on the basis that it is unlikely that notable population assemblages will be significantly affected by direct mortality once mitigation measures are in place.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate is content that this matter can be scoped out, subject to appropriate mitigation measures agreed with the relevant stakeholders, secured and embedded within control documents.
335	Table 8.4	Designated sites and notable habitats within 200m of roads that may be affected by the project – changes in air quality during maintenance	Due to the low predicted number of vehicle movements during maintenance, the Inspectorate agrees that vehicle emissions during operation are unlikely to result in significant effects on biodiversity receptors; therefore this matter can be scoped out of the ES.
336	Table 8.4	Designated sites and notable habitats within 200m of roads that may be affected by the project – changes in water quality and dust during maintenance	Due to the low predicted number of vehicle movements during maintenance, the Inspectorate agrees that vehicle emissions during operation are unlikely to result in significant effects on biodiversity receptors; therefore this matter can be scoped out of the ES.
337	Table 8.4	Designated sites and notable habitats – pollution impacts during maintenance	The Inspectorate agrees that given the nature of the development during maintenance, significant effects on biodiversity receptors during maintenance are unlikely and therefore agrees this matter can be scoped out of the ES.
338	Table 8.4	Habitat gains for nesting birds	The Inspectorate agrees that whilst pylons could provide additional nesting habitat for some species, any effects would be localised and unlikely to be significant. The Inspectorate agrees this matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
33.9	Table 8.7	Impacts to common and widespread habitats of low sensitivity and/or conservation interest	The Inspectorate agrees that impacts on common and widespread habitats of low sensitivity and/or conservation interest can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
33.10	Para 4.8.42	Underground cables	The Scoping Report identifies the potential for HDD under watercourses. Should HDD form part of the Proposed Development, the ES should assess any likely associated significant effects on ecological receptors including the impact of noise and magnetic fields on fish.
33.11	Table 8.1	Great crested newts - District Level Licensing (DLL)	<p>The Scoping Report states that the Applicant will engage with Natural England (NE) over the potential to use DLL. NE has advised the Applicant to pursue a traditional European Protect Species Mitigation-licensed approach as there is no active DLL scheme in Lincolnshire.</p> <p>The DLL approach includes strategic area assessment and the identification of risk zones and strategic opportunity area maps. The ES should include information to demonstrate whether the Proposed Development is located within a risk zone for GCN. If the Applicant enters into the DLL scheme, NE will undertake an impact assessment and inform the Applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN. The outcome of this assessment will be documented on an Impact Assessment and Conservation Payment Certificate (IACPC). The IACPC can be used to provide additional detail to inform the findings in the ES, including information on the Proposed Development's impact on GCN and the appropriate compensation required.</p>

ID	Ref	Description	Inspectorate's comments
33.12	Table 8.2	Study areas	Table 8.2 identifies study areas for different ecological receptors using fixed radii. The Applicant should ensure that the study areas take into account the Proposed Development's Zone of Influence (ZOI); for example, a fixed radii may not be appropriate for sites supporting mobile/migratory bird species. The selection of sites should be informed by Natural England's Impact Risk Zones.
33.13	Para 8.5.46 & Table 8.4	Collision mortality	<p>The Scoping Report proposes a qualitative assessment of bird mortality from in-flight collisions. The assessment methodology should be clearly described within the ES.</p> <p>The Scoping Report proposes to assess collision mortality due to permanent structures/barriers on breeding and non-breeding birds. The ES should also assess impacts on bird populations associated with designated sites, where significant effects are likely.</p>
33.14	Para 8.1.4	Cross referencing	<p>Paragraph 8.1.4 states that Chapter 15 Noise and Vibration includes details of the potential impacts of noise upon sensitive ecological features. Ecological receptors are not identified as a receptor for consideration within Chapter 15.</p> <p>Chapter 11 Geology and Hydrogeology states that effects on Groundwater Dependant Terrestrial Ecosystems (GWDTE) would be assessed within Chapter 8 Ecology and Biodiversity. GWDTEs are not identified as a receptor for consideration within Chapter 8 Ecology and Biodiversity.</p> <p>Whilst cross-reference across the ES is welcomed, the Applicant should ensure that assessments of likely significant effects are not accidentally omitted due to erroneous cross-referencing.</p>
33.15	n/a	Confidential annexes	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in

ID	Ref	Description	Inspectorate's comments
			an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.

3.4 Historic Environment

(Scoping Report Volume 1 – Chapter 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
34.1	Table 9.2	Access to designated heritage assets – operation	Considering the number of heritage assets present within, and in proximity to, the Scoping Boundary and given the lack of detail regarding the confirmed siting of the operational infrastructure, the Inspectorate considers it premature to scope out this matter. The ES should assess impacts to heritage assets during operation from all permanent infrastructure, including pylons and substations, where significant effects are likely, or information demonstrating agreement with the relevant consultation bodies that there would not be a likely significant effect.
34.2	Table 9.2	Physical impacts to, or changes to setting of heritage assets – vehicular traffic and maintenance activities	The Inspectorate agrees that physical impacts to, or changes to settings of heritage assets as a result of maintenance activities and traffic are not likely to result in significant effects and can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
34.3	Section 9.4	Study area	<p>The Inspectorate does not consider that sufficient justification has been given to the 1km study area for designated and non-designated heritage assets, given that the Landscape chapter identifies the potential for significant effects up to 3km. See ID 3.1.13 of this Opinion for comments in this regard.</p> <p>The study area should be of sufficient extent to ensure that potential receptors which are located on elevated points in the landscape, are appropriately accounted for within the</p>

ID	Ref	Description	Inspectorate's comments
			<p>assessment. Similarly, assets located outside of the study area but with settings that extend into the study area should be included within the assessment, where significant effects are likely.</p> <p>The Applicant is advised to agree the study area with relevant consultation bodies.</p>
344	Para 9.8.10	Geophysical surveys and trial trenching	<p>The Applicant should make efforts to agree all survey scope and effort with Historic England and the local authorities. This should include 'blank' areas and areas of known archaeological potential.</p> <p>Should any parts of the study area not be accessible for surveys, the ES should detail (and assess) any necessary flexibility and mitigation required to accommodate any risk.</p>
345	n/a	Noise and vibration	<p>The potential effects of noise and vibration on heritage assets have not been considered in the Scoping Report. The ES should assess the direct and indirect impacts of construction phase noise and vibration, where significant effects are likely.</p>
346	n/a	Indirect effects	<p>Indirect effects are not considered in the Scoping Report. The ES should identify and assess any likely significant indirect effects on the historic environment, for example, changes in drainage patterns which could affect heritage assets.</p>

3.5 Water Environment

(Scoping Report Volume 1 – Chapter 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
351	Table 10.6	Flood conveyance from scaffolding structures on river banks – construction	On the basis that scaffolding installations would be temporary and managed through regulatory permitting processes, the Inspectorate agrees that effects on flood conveyance would be localised and unlikely to be significant. This matter can be scoped out of the ES. However, should the Applicant choose to disapply Flood Risk Activity Permits under the Environmental Permitting Regulations (or any other relevant consents) through the DCO, this potential impact should be assessed within the ES.
352	Table 10.6	Increased surface water flood risk from impermeable surfaces associated with pylons - operation	The Inspectorate notes the advice from the Environment Agency and considers it premature to scope this matter out at this stage. The ES should assess any likely significant effects on flood risk and land drainage during operation (including impacts from flood debris during extreme flood events), or information demonstrating agreement with the relevant consultation bodies that there would not be a likely significant effect.
353		Increased flood risk from loss of floodplain storage/ disruption to flow paths associated with pylons - operation	
354	Table 10.6	Increased pollution risk associated	The Inspectorate agrees that there would be no significant sources of potential pollution associated with the overhead line infrastructure once construction is complete. This matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		with pylons - operation	
355	Para 10.7.15	Maintenance effects	The Inspectorate agrees that maintenance activities would pose a low risk of causing likely significant effects on water environment receptors. This matter can be scoped out of further assessment in the ES.

ID	Ref	Description	Inspectorate's comments
356	Table 10.1	Environment Agency assets	<p>Table 10.1 states that potential impacts on Environment Agency assets due to construction vibration would be assessed. This is not included in Table 10.10: Proposed scope of assessment. For the avoidance of doubt, the Inspectorate expects this matter to be assessed, where significant effects are likely.</p> <p>The Environment Agency has highlighted that some assets may not have been recently surveyed, if at all. The Applicant is advised to liaise with the Environment Agency with regards to the baseline conditions of all relevant assets and undertake additional surveys should they be deemed necessary.</p>
357	Para 10.7.3	Sources of impact	Decommissioning of relevant parts of the existing Grimsby West Substation should be considered as a source of potential impact during the construction phase.
358	Tables 10.7 & 10.8	Watercourse sensitivity and	The Environment Agency has highlighted concerns with the Applicant's approach to determining watercourse sensitivity and magnitude of impact. The Applicant is advised to revisit its approach and seek to agree the criterion with the Environment Agency.
359	Table 10.9	Significance matrix	The magnitude of change criterion included in Table 10.9: Significance matrix does not accord with those proposed in Table 10.8: Criteria for assigning impact magnitude. Furthermore, paragraph 10.8.13 states that 'Moderate' effects would be 'Significant',

ID	Ref	Description	Inspectorate's comments
			however Table 10.9 classes these as 'Potentially Significant'. The Applicant should ensure that the methodology for assessing significance is logical and consistent. Should the definition of 'Potentially Significant' be used, the ES should provide robust justification for the final conclusion made. See also ID 2.2.6 of this Opinion.
35.10	n/a	Ordinary watercourses	The Applicant should make efforts to identify flood risk for Ordinary Watercourses which do not have associated flood zones on the Environment Agency's Flood Map for Planning and to include this information within the assessment of flood risk.
35.11	n/a	Water quality (construction)	The potential for effects on ground water quality from disturbance and mobilisation of existing contamination should be assessed in the ES, where significant effects are likely.
35.12	n/a	Agricultural drainage	The ES should include an assessment of any likely significant effects on retained existing agricultural drainage or the removal of this from the construction and operation of the Proposed Development.
35.13	n/a	Underground cables	The ES should assess any likely significant effects on the water environment, for example from the use of drilling fluid, should underground cables form part of the Proposed Development.

3.6 Geology and Hydrogeology

(Scoping Report Volume 1 – Chapter 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
361	Table 11.3	Geological conservation sites (construction)	Subject to confirmation of the absence of locally designated sites in the Study Area, the Inspectorate agrees that geological conservation sites can be scoped out of the ES.
362	Table 11.3	Disturbance of unstable ground from historical coal mining (construction)	The Inspectorate agrees that this matter can be scoped out of the ES as the Study Area is not located within a recorded Coal Mining Reporting Area.
363	Tables 11.3 & 11.8	Effects on human health from residual soil contamination from construction activities (operation and maintenance)	Given the nature of the operational and maintenance phase, and that earthworks or materials movement (including any re-use of materials) during construction would be controlled under appropriate Environmental Permits, exemptions or CL:AIRE 'The definition of Waste: The development industry Code of Practice, the Inspectorate agrees significant effects are unlikely and that this matter can be scoped out of the ES.
364	Table 11.3	Deterioration in chemical quality of the land and aquifers through disturbance of ground that is affected by pre-existing contamination for	Whilst some ground disturbance may be necessary during maintenance, the Inspectorate assumes that this would be to land previously disturbed during construction. On the basis that earthworks or materials movement during operation is suitably controlled, the Inspectorate agrees this matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		maintenance purposes	
365	Table 11.3	Physical effects on aquifers, such as depletion of the aquifer and increased solids / turbidity from dewatering (operation)	The Inspectorate agrees that this matter can be scoped out of the ES subject to no excavations and dewatering being required during operation.
366	Table 11.3	Structural damage to proposed structures from unstable or chemically aggressive ground conditions (operation)	The Inspectorate agrees this matter can be scoped out of the ES on the basis that it will be considered as part of the standard engineering design process.
367	Para 11.7.4	Mineral safeguarding	Although paragraph 11.7.4 states that this matter is not scoped out, it further explains that it would be addressed through a stand-alone Minerals Sterilisation Report to be submitted as a separate document as part of the DCO application. Whilst this approach may be familiar to relevant consultees, the Applicant is reminded that all likely significant effects should be assessed within the ES. For the avoidance of doubt, any likely significant effects on mineral safeguarding should be assessed within the ES.
368	Para 11.7.4	Damage to structures from vibrations caused by piling	Although paragraph 11.7.4 states that this matter is not scoped out, it further states that this is a matter of consideration for a structural engineer. The Inspectorate agrees that this matter is outside the scope of the geology and hydrogeology assessment, however

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			any likely significant effects should be assessed as appropriate within the Noise and Vibration chapter.

ID	Ref	Description	Inspectorate's comments
369	Table 11.2	Private groundwater supplies	Table 11.2 states that the assessment will consider the effects of construction works on private groundwater abstractions. This is not explicitly included in Table 11.8: Proposed scope of assessment. For the avoidance of doubt, the Inspectorate expects this matter to be assessed, where significant effects are likely.
36.10	Paras 11.5.17, 11.5.23 & 11.5.42	Historic landfills	The Scoping Report identifies a number of historic landfills in the Study Area but does not state whether there would be any impacts on these receptors. The ES should assess any likely significant effects that could arise from the Proposed Development, for example the mobilisation of contamination and the creation of pathways for contaminants.

3.7 Agriculture and Soils

(Scoping Report Volume 1 – Chapter 12)

ID	Ref	Applicant’s proposed matters to scope out	Inspectorate’s comments
371	Tables 12.3 & 12.10	Impacts on agricultural land quality (operation and maintenance)	<p>Table 12.3 states that periodic vehicle access for routine maintenance and emergency repairs may require temporary access tracks and small compound areas but these are likely to be limited in extent. It states that all soil handling would be undertaken in line with published good practice.</p> <p>However, Table 12.7 states that temporary development can result in a permanent impact if the resulting disturbance of land use change causes permanent damage to soils. At present, the location and extent of temporary access tracks and compounds are not determined. On this basis, the Inspectorate does not agree this matter can be scoped out.</p> <p>The ES should assess any likely significant effects on agricultural land quality during the operation and maintenance phase based on the expected maximum extent of any routine maintenance activities.</p>
372	Tables 12.3 & 12.10	Impacts on soil ecosystem services (operation and maintenance)	<p>The Scoping Report notes that maintenance works would impact soils at a smaller scale than construction and that disturbance to soils during maintenance would be undertaken in accordance with good practice soil handling methods.</p> <p>However, Table 12.7 states that temporary development can result in a permanent impact if the resulting disturbance of land use change causes permanent damage to soils. At present, the location and extent of temporary access tracks and compounds are not determined. On this basis, the Inspectorate does not agree this matter can be scoped out.</p> <p>The ES should assess any likely significant effects on soil ecosystem services during the operation and maintenance phase based on the expected maximum extent of any routine maintenance activities.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
373	Tables 12.3 & 12.10	Impacts on agricultural land holdings (operation and maintenance)	<p>The Inspectorate acknowledges that temporary access tracks and small compound areas required for maintenance activities and emergency repairs are likely to be smaller in extent than during construction.</p> <p>However, Table 12.7 states that temporary development can result in a permanent impact if the resulting disturbance of land use change causes permanent damage to soils. At present, the location and extent of temporary access tracks and compounds are not determined. On this basis, the Inspectorate does not agree this matter can be scoped out.</p> <p>The ES should assess any likely significant effects on agricultural holdings during the operation and maintenance phase based on the expected maximum extent of any routine maintenance activities.</p>

ID	Ref	Description	Inspectorate's comments
374	Para 12.3.1	Consultation	Whilst it is acknowledged the majority of the Proposed Development would be located within Lincolnshire County Council's administrative area, the Applicant is advised to also consult with Cambridgeshire County Council and Norfolk County Council to inform the assessment.
375	Section 12.5	Agri Environment Schemes	Agri Environment Schemes and Woodland and Forestry Schemes are present within the Scoping Boundary. They have not been explicitly identified as a receptor in Table 12.3, nor are they further mentioned in the scope of assessment. Any likely significant effects on these schemes should be considered within the assessment of effects.
376	n/a	Best Most Versatile (BMV) land	The ES should contain a clear tabulation of the areas of land in each Best Most Versatile (BMV) classification to be temporarily or permanently lost as a result of the Proposed Development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided.

ID	Ref	Description	Inspectorate's comments
			Consideration should be given to the use of BMV land in the Applicant's discussion of alternatives.

3.8 Transport and Movement

(Scoping Report Volume 1 – Chapter 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
381	Tables 13.2 & 13.7	Impacts of abnormal loads on road users (construction)	The Scoping Report states that abnormal loads are planned for off-peak times and that routes would be agreed with the local highway authorities. However, there is no information to demonstrate that abnormal loads are capable of being transported in off-peak times and whether road closures or diversions would be required. The Inspectorate agrees with National Highways that this matter should be scoped in. The ES should therefore assess the likely significant effects of the transportation of abnormal loads during the construction phase.
382	Tables 13.2 & 13.7	Impacts of hazardous loads on general public (construction)	Table 13.2 states that there is low potential for significant effects on the general public as a result of a road traffic accident leading to a Hazardous Load spill. However, the Inspectorate notes the proposal in paragraph 13.8.38 to identify abnormal or hazardous loads during construction; to present a qualitative risk assessment; and to identify measures that will be employed to ensure the safe vehicular transport of components to and from the Project. The Inspectorate agrees with this proposed scope of assessment and therefore does not agree the matter can be scoped out.
383	Tables 13.2 & 13.7	Impacts of closure of railway line on railway users (construction)	<p>The Scoping Report states that blockades/temporary closures to install protection/temporary works would occur overnight or during quiet periods to avoid/minimise impact; and that any vehicle crossings (if required) would be managed.</p> <p>Given the stage of the Proposed Development and the lack of information on where the Proposed Development may cross railway infrastructure, the Inspectorate considers that there is insufficient evidence at this stage to scope this matter out of the assessment. The ES should include an assessment of the potential impacts to the railway network and operational rail safety, where there is potential for likely significant effects to occur. The</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Applicant should make effort to agree the approach to assessment with relevant consultation bodies including Network Rail.
384	Tables 13.2 & 13.7	Impacts of closures of waters on waterway users (construction)	<p>The Scoping Report states that temporary culverts or temporary spanned bridges would be used for construction traffic to cross waterways.</p> <p>Given the stage of the Proposed Development and the lack of information on where the Proposed Development may cross waterways, and the requisite construction methods, the Inspectorate considers that there is insufficient evidence at this stage to scope this matter out. The ES should assess any likely significant effects on waterway users from the construction and use of temporary culverts or temporary spanned bridges across waterways.</p>
385	Tables 13.2 & 13.7	<p>Impacts of increased operational and maintenance traffic volumes on :</p> <ul style="list-style-type: none"> - road users; - public transport users (bus); and - pedestrians and cyclists. 	<p>The Scoping Report states that the number of operational and maintenance trips are anticipated to be low, however has not provided the anticipated movements at this stage. If the ES can demonstrate that the number of trips would not trigger the screening thresholds specified in the Institute of Environmental Management and Assessment (IEMA) Guidelines – Environmental Assessment of Traffic and Movement (2023), the Inspectorate agrees the matter can be scoped out of from further assessment. Should the number of movements exceed this threshold, the Inspectorate expects the ES to assess the likely significant effects of increased operational traffic on these receptors.</p>
386	Tables 13.2 & 13.7	Impacts of vehicle crossing points on railway users (operation and maintenance)	The Scoping Report states that the number of crossings would be low. However, given the stage of the Proposed Development and the lack of information on the location or number of vehicle crossing points on railways, the Inspectorate does not agree this matter can be scoped out. The ES should assess likely significant effects on railway users, or provide

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			information demonstrating agreement with the relevant consultation bodies that there would not be a likely significant effect.

ID	Ref	Description	Inspectorate's comments
387	n/a	Access to recreational and tourism receptors	Impacts on access to recreational and tourism receptors should be assessed, where significant effects are likely.
388	n/a	Emergency services	The ES should consider the potential for significant effects on emergency services associated with any temporary road closures and/or temporary roadworks.

3.9 Air Quality

(Scoping Report Volume 1 – Chapter 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
391	Tables 14.2 & 14.7	Non-Road Mobile Machinery (NRMM) emissions and static equipment combustion (construction, operation and maintenance)	<p>The Scoping Report states that this matter has been 'provisionally' scoped out on the assumption that the work would be short term in nature and best practice would be followed within the CoCP and NRMM standards. It is unclear from the Scoping Report what measures and standards are being referred to.</p> <p>Limited information has been provided in the Scoping Report regarding the likely use of NRMM. Specifically, no information has been provided as to the type, number, location or operational hours of such machinery and likely emissions, other than references to the minimal and temporary nature of NRMM use. On this basis the Inspectorate is unable to scope this matter out at this stage.</p> <p>The ES should include an assessment of NRMM emissions which are likely to result in significant effects or otherwise present a justification in the ES as to why significant effects are not likely to occur. Where mitigation measures are being relied upon, these should be secured in the draft DCO.</p>
392	Tables 14.2 & 14.7	Dust emissions (operation and maintenance)	<p>The Inspectorate agrees that significant effects are unlikely due to the infrequent, temporary and transient nature of operational and maintenance phase activities. This matter can be scoped out of the ES.</p>
393	Tables 14.2 & 14.7	Vehicular emissions (operation and maintenance)	<p>The Scoping Report states that the number of operational and maintenance trips are not anticipated to exceed the Institute of Air Quality Management (IAQM) (2017) Land-Use Planning & Development Control: Planning for Air Quality screening criteria. Provided the ES can demonstrate that this is the case, the Inspectorate agrees the matter can be scoped out of from further assessment. Should the number of movements exceed this</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			threshold, the Inspectorate expects the ES to assess the likely significant effects of increased operational and maintenance traffic on these receptors.
394	Para 14.10.4	Emissions from diverted traffic and road closures	The Inspectorate agrees that vehicle emissions associated with diverted traffic can be scoped out of the ES, provided it can be demonstrated that the predicted volumes of diverted traffic would not exceed the relevant indicative criteria for air quality assessment set out in the IAQM guidance.

ID	Ref	Description	Inspectorate's comments
395	Para 14.4.1	Study area	The study area for ecological designated sites described in paragraph 14.4.1 do not accord with those detailed in Table 14.1. The study areas should be consistently described and applied within the ES, following Natural England's guidance, unless a robust justification for deviation from it can be provided.

3.10 Noise and Vibration

(Scoping Report Volume 1 – Chapter 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.101	Tables 15.2 & 15.11	Vibration from construction traffic	The Scoping Report proposes to scope out an assessment of vibration from construction traffic on the basis that significant effects are not expected. The Inspectorate agrees that vibration from traffic during construction is unlikely to result in significant effects and is content that this matter can be scoped out of the ES.
3.102	Para 15.6.4 and Tables 15.2 & 15.11	Noise from overhead lines (operation)	The Scoping Report states that the overhead line system would be a 'triple araucaria' conductor bundle and that pylon fittings would be designed to National Grid Technical Specifications. The Inspectorate agrees that operational noise generated from OHLs and pylons is unlikely to give rise to significant effects and is therefore content to scope this matter out on the basis that this conductor type is used. The Inspectorate welcomes that the Applicant would consider an assessment within the ES should alternative conductor types be employed.
3.103	Tables 15.2 & 15.11	Noise from substation switchgear and auxiliary plant (operation)	Given the nature and anticipated frequency of noise from substation switchgear and auxiliary plant, the Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of the ES.
3.104	Tables 15.2 & 15.11	Vibration (operation)	On the basis that the substation plant would include vibration isolation measures within the design, the Inspectorate agrees that significant effects from operational vibration are unlikely. As such, this matter can be scoped out of the ES.
3.105	Tables 15.2 & 15.11	Noise and vibration from maintenance activities	The Inspectorate agrees that noise and vibration from short term maintenance activities can be scoped out of the ES. However, the ES should consider the potential for more substantial activity to be required as part of maintenance, eg replacement of components

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			of the Proposed Development, which would be more akin to the impacts described during the construction stage. The ES should include an assessment of any likely significant effects from such activities.

ID	Ref	Description	Inspectorate's comments
3.106	Table 15.2	Vibration impacts on flood defences	Figure 10.2 shows that the Scoping Boundary overlaps with a number of existing flood defences. The ES should assess any likely significant effects of vibration on these structures from construction of the Proposed Development.

3.11 Socio-economics, Recreation and Tourism

(Scoping Report Volume 1 - Chapter 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Tables 16.16 & 16.20	Potential employment and training benefits across the supply chain - the local labour market (operation and maintenance)	The Inspectorate agrees that this matter can be scoped out of the ES on the basis that operation and maintenance of the Proposed Development would generate a limited number of additional jobs and is therefore unlikely to give rise to any significant effects with respect to this matter.
3.11.2	Tables 16.16 & 16.20	Potential disruption to local users of promoted recreational routes and PRow of significance in the local area (operation and maintenance)	<p>The Scoping Report states that significant effects on promoted recreational routes and PRow of significance in the local area are not anticipated during operation. It states that disruption to these receptors during maintenance would be avoided as far as possible and managed with a PRow Management Plan.</p> <p>On this basis, and due to the infrequent, temporary and transient nature of operational and maintenance phase activities, the Inspectorate agrees that significant effects would be unlikely. The Inspectorate agrees that this matter can be scoped out of the ES.</p>
3.11.3	Tables 16.16 & 16.20	Potential temporary or permanent loss of development land, utilities and renewables infrastructure (operation and maintenance)	The Scoping Report states that no significant effects on development land and utilities and renewable infrastructure are anticipated during operation, and that disruption to development land during maintenance would be avoided as far as possible. The Inspectorate agrees that significant effects are unlikely due to the infrequent, temporary and transient nature of operational and maintenance phase activities. This matter can be scoped out of the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.4	Tables 16.16 & 16.20	Potential temporary or permanent loss of open space (operation and maintenance)	The Scoping Report states that no significant effects on open space are anticipated during operation, and disruption to open space during maintenance would be avoided as far as possible. Given the limited amount of open space within the Scoping Boundary (as depicted on Figure 17.4), and taking into account the infrequent, temporary and transient nature of operational and maintenance phase activities, the Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of the ES.
3.11.5	Tables 16.16 & 16.20	Potential temporary or permanent loss of, or impacts on communities, community facilities, visitor attractions and businesses (construction, operation and maintenance)	<p>The Scoping Report states that the Proposed Development has been designed to avoid direct effects on these receptors as far as possible and that should this change, and these receptors are likely to be directly impacted, these would be included in the assessment as appropriate for the ES.</p> <p>Subject to this caveat, the Inspectorate agrees that this matter can be scoped out of the ES.</p>
3.11.6	Tables 16.16 & 16.20	Potential temporary or permanent loss of access and impact on amenity on affected communities, community facilities, visitor attractions and businesses (indirect effects) (operation and maintenance)	On the basis that access to these receptors would be reinstated post construction, and that their ongoing use would be unaffected during operation and maintenance activities, the Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out of the ES. The ES should demonstrate that such reinstatement is achievable and should uncertainty remain, an assessment of likely significant effects should be provided.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.7	Tables 16.16 & 16.20	Potential for impacts on the availability of tourism accommodation (operation and maintenance)	The Inspectorate agrees that the scale of operational employment generated is unlikely to result in significant effects on tourism accommodation availability and that this matter can be scoped out of the ES.
3.11.8	Tables 16.16 & 16.20	Potential temporary or permanent loss of residential property, access, and impact on amenity - direct or indirect effects (construction, operation and maintenance).	<p>The Scoping Report states that the emerging preferred corridor for the Proposed Development and substation siting areas would avoid acquisition or over-sail of residential properties. Indirect effects such as access and noise would be managed through the proposed Construction Transport Management Plan (CTMP) and Construction Environment Management Plan (CEMP) to reduce the potential for significant effects.</p> <p>The Inspectorate agrees that this matter can be scoped out of the ES on this basis. However, should acquisition or over-sail of residential properties be required, the potential loss of property, access and impact on amenity should be assessed, where significant effects are likely.</p>
3.11.9	Para 16.9.2	Commercial agreements for land, financial effects on businesses and property values	The Inspectorate agrees that this matter can be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.11.10	Appendix 19.1 Table 19A.1	Aviation report	Table 19A.1 of Appendix 19.1 states that an aviation report will be produced to identify all airfields and airstrips and will set out potential issues for each. This is stated to be identified in Chapter 16 Socioeconomics, Recreation and Tourism, however there is no further reference to it within Chapter 16. This information should be summarised within the ES, with consideration also given to potential impacts on Ministry of Defence assets, where significant effects are likely.

3.12 Health and Wellbeing

(Scoping Report Volume 1 – Chapter 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.121	Paras 17.1.2 & 17.6.2 Tables 17.9 & 17.13	Electromagnetic fields (EMF) - potential permanent impacts on local residents and workers associated with the generation of EMFs (operation)	<p>The Scoping Report states that the Proposed Development would be designed to comply with existing National Grid standards and the guidelines and policies detailed in NPS-EN5, including the International Commission on Non-Ionizing Radiation Protection guidelines to ensure that all equipment will comply with public EMF exposure limits. It confirms that an EMF report will be prepared as part of the Proposed Development but separate to the EIA process.</p> <p>The Inspectorate agrees that an assessment of the actual effects from EMFs during operation can be scoped out provided that the ES contains a summary of the compliance report and confirms that there is no potential for significant environmental effects. However, the perceived effects of EMF and impacts on mental health should be assessed (see ID 3.12.2 below).</p>
3.122	Table 17.1	Mental health assessment	<p>Table 17.1 proposes to scope out a mental health assessment, but states that further engagement will be undertaken with Norfolk County Council to ensure mental health is considered appropriately. No further reference is made within the Scoping Report to mental health. The Inspectorate does not agree this matter can be scoped out. Impacts on mental health, in particular anxiety or concern in relation to EMF exposure, should be assessed across the entire study area. The UK Health and Security Agency has provided comments in this regard.</p>
3.123	Table 17.9	Increased employment for the operational workforce, leading to improved health	<p>The Inspectorate considers that this matter can be scoped out of the ES as the scale of operational employment generated is likely to be very limited and therefore unlikely to result in significant effects.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		outcomes (operation)	
3.124	Table 17.9	Potential temporary changes in neighbourhood quality leading to worsened health outcomes (maintenance)	The Inspectorate considers that this matter can be scoped out of the ES as the scale of maintenance activities is unlikely to cause potential for significant adverse health-related effects.
3.125	Table 17.9	Impact on local residents' access to promoted recreational routes adjacent to Proposed Development infrastructure, potentially leading to worsened health outcomes (maintenance)	The Inspectorate considers that significant effects are unlikely on the basis that no disruption to promoted recreational routes is expected during maintenance of the Proposed Development. This matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
3.126	Table 17.6	Healthcare and social infrastructure	Healthcare facilities are identified on Figure 17.2 but are not detailed within Table 17.6 (which identifies educational facilities only). The descriptive text within the ES should provide commentary on all relevant facilities.
3.127	n/a	Impacts on transport links to healthcare facilities – construction	The ES should assess impacts on transport routes to and between healthcare facilities, where significant effects are likely. This should consider access by public users of such facilities, as well as by the healthcare providers themselves. Consideration should be given to the impacts of the Proposed Development on air ambulance access, where significant effects are likely. Appropriate cross reference should be made to the Traffic and Transport chapter of the ES.
3.128	n/a	Vulnerable populations	Consideration should be given to the potential for impacts on vulnerable populations, as required by the IEMA guidance referred to (Determining Significance for Human Health in Environmental Impact Assessment).

3.13 Climate Change

(Scoping Report Volume 1 – Chapter 18)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.131	Para 18.1.3 Appendix 18A	Climate Change Resilience - Vulnerability of the Proposed Development to climate change	<p>The Climate Change Resilience (CCR) Screening Assessment (Appendix 18A) sets out the potential impacts of current and future climate change on the construction, operation, and maintenance of the Proposed Development along with proposed design, control and management measures. It confirms that vulnerability of the Proposed Development to climate change in terms of flood risk would be considered as part of the proposed Flood Risk Assessment (FRA) and associated analysis presented in Chapter 10 (Water Environment).</p> <p>Provided that all design and control measures identified in the CCR are demonstrably secured, the Inspectorate agrees that significant effects are unlikely and that no further assessment of the Proposed Development's vulnerability to climate change is required.</p>
3.132	Para 18.1.3	In-Combination Climate Change Impact (ICCI) assessment	<p>The Scoping Report proposes to scope out a standalone ICCI assessment in the ES and instead, each environmental chapter will take account of projected future climate change within their future baseline. The Inspectorate agrees to this approach.</p>
3.133	Table 18.3	Maintenance of the built asset components and systems (operation)	<p>The Scoping Report states that the Proposed Development would not be designed with the expectation of any significant plant maintenance and repair activities being required. The Inspectorate agrees that this matter can be scoped out from the ES on this basis.</p>
3.134	Table 18.3	Refurbishment of the built asset	<p>Table 18.3 states that the Proposed Development would not be designed with the expectation of refurbishment being required. The Inspectorate notes this contradicts the potential refurbishment activities detailed in paragraphs 4.10.6 – 4.10.10. Nevertheless,</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		components and systems (operation)	given the nature of these activities, the Inspectorate agrees that significant effects are unlikely and that this matter can be scoped out from the ES.
3.135	Table 18.3	Operational energy and water use	<p>The Inspectorate considers that this matter can be scoped out of the ES on the basis that minimal operational energy use or water use is expected.</p> <p>The Inspectorate notes that water use during construction is not explicitly scoped in. For the avoidance of doubt, the Inspectorate expects any likely significant effects from water use for concrete batching, dust suppression and welfare to be assessed.</p>
3.136	Table 18.3	Users' utilisation of infrastructure	The Scoping Report states that the Proposed Development is not expected to have any direct and quantifiable impact on greenhouse gas (GHG) emissions from electricity use that is distinct from wider national trends on grid decarbonisation. The Inspectorate agrees that this matter can be scoped out from the ES on this basis.
3.137	Tables 18.3 and 18.6	Decommissioning	As noted in ID 2.2.1 of this Scoping Opinion, the Inspectorate agrees that decommissioning impacts can be scoped out of the ES.
3.138	Table 18.6	Emissions associated with pre-construction	The Scoping Report does not explain what activities are considered to form part of the 'Pre-construction' phase. The Inspectorate has assumed this to include pre-construction surveys and site clearance. On this basis, the Inspectorate agrees that any associated emissions would be small and not likely to be material to the assessment. The Inspectorate agrees that this matter can be scoped out from the ES on this basis.

ID	Ref	Description	Inspectorate's comments
3.139	n/a	n/a	n/a

3.14 Major Accidents and Disaster

(Scoping Report Volume 1 – Chapter 19)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Table 19.3 & Appendix 19A	Natural hazards: <ul style="list-style-type: none"> • geophysical; • hydrological; • climatological; • meteorological; and • biological 	<p>Table 19A.1 lists the potential natural hazards which the Applicant does not consider the Proposed Development to be vulnerable to or be a potential cause of.</p> <p>The Inspectorate agrees that significant effects on/from natural hazards are not likely and that these matters can be scoped out of the ES based on the reasoning set out in Appendix 19A, apart from flood risk. The Inspectorate notes that flood risk is scoped out of the Major Accidents and Disaster ES chapter on the basis that a proposed FRA will be submitted with the ES. The Inspectorate is content with this approach on the basis that the FRA assesses the vulnerability of the Proposed Development to flood risk and the potential for the Proposed Development to increase flood risk elsewhere.</p>
3.14.2	Appendix 19A - Table 19A.1	Technological or man-made hazards: <ul style="list-style-type: none"> • accidents - societal, industrial, urban, transport, and pollution; • utilities failure; • malicious attacks; 	<p>Table 19A.1 lists the potential technological or man-made hazards which the Applicant does not consider the Proposed Development to be vulnerable to or be a potential cause of.</p> <p>The Inspectorate agrees that significant effects are not likely and that these matters can be scoped out of the ES based on the reasoning set out in Appendix 19A.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		<ul style="list-style-type: none"> • engineering accidents and failures; • human error; • sabotage or arson on proposed infrastructure during construction and operation; and • unexploded ordnance. 	

ID	Ref	Description	Inspectorate's comments
3.14.3	Section 19.10 & Appendix 19A	Standards, measures and processes	Notwithstanding the Inspectorate's agreement to scope out an assessment of effects for Major Accidents and Disasters from the ES, the description of the Proposed Development in the ES should describe any standards/ measures and processes which would be relied on to exclude likely significant effects and explain how they would be secured and implemented as part of the DCO.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Secretary of State for Defence	Ministry of Defence
The Environment Agency	The Environment Agency
Natural England	Natural England
The Forestry Commission	The Forestry Commission - East & East Midlands
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The relevant internal drainage board	Black Sluice Internal Drainage Board
	Lindsey Marsh Drainage Board
	North East Lindsey Drainage Board
	Witham First District Internal Drainage Board
	Witham Third District Internal Drainage Board
	Witham Fourth District Internal Drainage Board
	Hundred of Wisbech Internal Drainage Board
	Needham and Laddus Internal Drainage Board
	Waldersey Internal Drainage Board
	Middle Level Commissioners
	North Level Internal Drainage Board

SCHEDULE 1 DESCRIPTION	ORGANISATION
	East of the Ouse Polver and Nar Internal Drainage Board
	Downham and Stow Bardolph Internal Drainage Board
	Kings Lynn Internal Drainage Board
	South Holland Internal Drainage Board
	Welland and Deepings Internal Drainage Board
	Churchfield & Plawfield Internal Drainage Board
	Nordelph Internal Drainage Board
The Canal and River Trust	The Canal and River Trust
The relevant Highways Authority	Lincolnshire County Council
	Norfolk County Council
	Cambridgeshire County Council
	Peterborough City Council
	North East Lincolnshire Council
	National Highways
The Civil Aviation Authority	Civil Aviation Authority
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England
The relevant police authority	Humberside Police and Crime Commissioner
	Lincolnshire Police and Crime Commissioner
	Cambridgeshire Police and Crime Commissioner

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Norfolk Police and Crime Commissioner
The relevant ambulance service	Yorkshire NHS Ambulance Trust
	East Midlands Ambulance Trust
	East of England Ambulance Service NHS Trust
The relevant fire and rescue authority	Humberside Fire and Rescue Authority
	Lincolnshire Fire and Rescue Authority
	Cambridgeshire Fire and Rescue Authority
	Norfolk Fire and Rescue Authority
The relevant parish councils	Aby with Greenfield Parish Council
	Addlethorpe Parish Council
	Alford Parish Council
	Algarkirk Parish Council
	Alvingham Parish Council
	Amber Hill Parish Council
	Anderby Parish Council
	Ashby cum Fenby Parish Council
	Aylesby Parish Council
	Barnoldby Le Beck Parish Council
	Belleau Parish Council
	Benington Parish Council
	Bicker Parish Council
	Billingborough Parish Council
	Bilsby & Farlesthorpe Parish Council
	Bradley Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Brigsley Parish Council
	Burgh Le Marsh Town Council
	Butterwick Parish Council
	Candlesby with Gunby Parish Council
	Carrington Parish Council
	Chapel St. Leonards Parish Council
	Claxby St. Andrew Parish Council
	Claythorpe Parish Council
	Coningsby Town Council
	Conisholme Parish Council
	Covenham Parish Council
	Cowbit Parish Council
	Croft Parish Council
	Crowland Parish Council
	Deeping St. Nicholas Parish Council
	Dogdyke Parish Council
	Donington Parish Council
	Dowsby Parish Council
	East Keal Parish Council
	East Kirkby Parish Council
	Eastville, Midville and New Leake Group Parish Council
	Elkington Parish Council
	Farlesthorpe Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Firsby Group Parish Council (inc. Bratoft, Firsby, Great Steeping, Little Steeping and Irby in the Marsh)
	Fishtoft Parish Council
	Fleet Parish Council
	Fosdyke Parish Council
	Fotherby Parish Council
	Frampton Parish Council
	Freiston Parish Council
	Friskney Parish Council
	Frithville and Westville Parish Council
	Fulstow Parish Council
	Gedney Parish Council
	Gedney Hill Parish Council
	Gorefield Parish Council
	Gosberton Parish Council
	North Thoresby, Grainsby & Waithe Parish Council
	Grainthorpe Parish Council
	Great and Little Carlton Parish Council
	Great Coates Parish Council
	Great Hale Parish Council
	Great Limber Parish Council
	Grimoldby Parish Council
	Halton Holegate Parish Council
	Healing Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Heckington Parish Council
	Hogsthorpe Parish Council
	Holbeach Parish Council
	Holland Fen with Brothertoft Parish Council
	Holton Le Clay Parish Council
	Horbling Parish Council
	Humberston Parish Council
	Hundleby Parish Council
	Huttoft Parish Council
	Ingoldmells Parish Council
	Irby Parish Council
	Keelby Parish Council
	Kirton Parish Council
	Laceby Parish Council
	Langrville Parish Council
	Legbourne Parish Council
	Leverington Parish Council
	Leverton Parish Council
	Little Cawthorpe Parish Council
	Long Sutton Parish Council
	Louth Parish Council
	Ludborough Parish Council
	Lutton Parish Council
	Mablethorpe and Sutton Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Maltby Le Marsh Parish Council
	Manby Parish Council
	Markby Parish Council
	Marshchapel Parish Council
	Marshland St. James Parish Council
	Muckton Parish Council
	Mumby Parish Council
	New Waltham Parish Council
	Newton-in-the-Isle Parish Council
	North Cotes Parish Council
	North Kyme Parish Council
	North Ormsby Parish Council
	North Somercotes Parish Council
	Old Leake Parish Council
	Orby Parish Council
	Parson Drove Parish Council
	Partney Parish Council
	Pinchbeck Parish Council
	Pointon and Sempringham Parish Council
	Quadring Parish Council
	Revesby Parish Council
	Rigsby with Ailby Parish Council
	Rippingale Parish Council
	Saltfleetby Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Sibsey Parish Council
	Skegness Parish Council
	Skidbrooke with Saltfleet Haven Parish Council
	South Cockerington Parish Council
	South Somercotes Parish Council
	Spilsby Parish Council
	Stallingborough Parish Council
	Stewton Parish Council
	Stickford Parish Council
	Stickney Parish Council
	Surfleet Parish Council
	Sutterton Parish Council
	Sutton Bridge Parish Council
	Sutton St. Edmund Parish Council
	Sutton St. James Parish Council
	Swaby, Haugh and South Thoresby Parish Council
	Swallow Parish Council
	Swineshead Parish Council
	Tathwell Parish Council
	Terrington St. Clement Parish Council
	Terrington St. John Parish Council
	Tetney Parish Council
	The Moultons Parish Council
	Theddlethorpe All Saints and St Helens Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Thorney Parish Council
	Thornton Le Fen Parish Council
	Thorpe St. Peter Parish Council
	Toynton All Saints Parish Council
	Toynton St. Peter Parish Council
	Tydd St. Giles Parish Council
	Tydd St. Mary Parish Council
	Utterby Parish Council
	Wainfleet All Saints Parish Council
	Wainfleet St. Mary Parish Council
	Walpole Parish Council
	Walpole Cross Keys Parish Council
	Walpole Highway Parish Council
	Walsoken Parish Council
	Waltham Parish Council
	Welton Le Marsh Parish Council
	West Keal Parish Council
	West Walton Parish Council
	Weston Parish Council
	Whaplode Parish Council
	Wigtoft Parish Council
	Wildmore Parish Council
	Willoughby with Sloothby Parish Council
	Withern with Stain Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Wrangle Parish Council
	Wyberton Parish Council

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

‘Statutory Undertaker’ is defined in the APFP Regulations (as amended) as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Humber and North Yorkshire Integrated Care Board
	NHS Cambridgeshire and Peterborough Integrated Care Board
	NHS Lincolnshire Integrated Care Board
	NHS Norfolk and Waveney Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	Yorkshire NHS Ambulance Trust
	East Midlands Ambulance Trust
	East of England Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Canal Or Inland Navigation Authorities	The Canal and River Trust
Dock and Harbour authority	Fosdyke Yacht Haven Ltd
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding

STATUTORY UNDERTAKER	ORGANISATION
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Affinity Water
	Anglian Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
	CNG Services Ltd
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
Last Mile Gas Ltd	
Leep Gas Networks Limited	

STATUTORY UNDERTAKER	ORGANISATION
	Mua Gas Limited
	Quadrant Pipelines Limited
	Saltfleetby Energy Limited
	Stark Works
	National Gas
The relevant electricity distributor with CPO Powers	Advanced Electricity Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Eastern Power Networks Plc
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
UK Power Distribution Limited	

STATUTORY UNDERTAKER	ORGANISATION
	Utility Assets Limited
	UK Power Networks Limited
	Vattenfall Networks Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operation Limited
	National Grid Viking Link Limited

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
Lincoln City Council
Newark and Sherwood District Council
Fenland District Council
East Cambridgeshire District Council
Huntingdonshire District Council
West Lindsey District Council
South Holland District Council
Boston Borough Council
North Kesteven District Council
East Lindsey District Council
King's Lynn and West Norfolk District Council
Bassetlaw District Council
North Norfolk District Council
South Kesteven District Council
West Suffolk District Council

LOCAL AUTHORITY
Breckland District Council
Peterborough City Council
North East Lincolnshire Council
North Lincolnshire Council
Lincolnshire County Council
The Broads Authority
North Northamptonshire Council
Central Bedfordshire Council
Bedford Borough Council
Rutland County Council
Essex County Council
Suffolk County Council
Cambridgeshire County Council
Norfolk County Council
Hertfordshire County Council
Nottinghamshire County Council
Leicestershire County Council

TABLE A4: THE MARINE MANAGEMENT ORGANISATION

Section 42(1)(a) of the PA2008 requires consultation with the Marine Management Organisation in any case where the proposed development would affect, or would be likely to affect, any of the areas specified in subsection 42(2).

ORGANISATION
The Marine Management Organisation

TABLE A5: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
East Midlands Combined County Authority
East Riding of Yorkshire Council

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Aby with Greenfield Parish Council
Anderby Parish Council
Anglian Water
Ashby cum Fenby Parish Council
Bedford Borough Council
Bicker Parish Council
Bilsby & Farlesthorne Parish Council
Boston Borough Council
Breckland Council
Broads Authority
The Canal and River Trust
Cambridgeshire County Council
Covenham Parish Council
Crowland Parish Council
East Cambridgeshire District Council
East Lindsey District Council
Elkington Parish Council
Environment Agency
Essex County Council
Fenland District Council
Frithville with Westville Parish Council
Firsby Group Parish Council

Fleet Parish Council
Forestry Commission
Fulstow Parish Council
Grimoldby and Manby Parish Council
Health and Safety Executive
Historic England
Holbeach Parish Council
Huttoft Parish Council
King's Lynn and West Norfolk District Council
Lincolnshire County Council
Lindsey Marsh Drainage Board
Louth Town Council
Marine Management Organisation
Ministry of Defence
National Gas
National Highways
NATS En-Route Safeguarding
Natural England
Newark and Sherwood District Council
Norfolk County Council
North East Lincolnshire Council
North Northamptonshire Council
Northern Gas Networks
Orby Parish Council
Peterborough City Council
Quadring Parish Council

Rigsby with Ailby Parish Council
Royal Mail
Rutland County Council
South Holland District Council
South Kesteven District Council
Spilsby Town Council
Theddlethorpe All Saints and St Helens Parish Council
Thornton Le Fen Parish Council
United Kingdom Health Security Agency
Utterby Parish Council
Water Management Alliance (South Holland Internal Drainage Board and King's Lynn Internal Drainage Board)
Welton le Marsh and Willoughby & District Parish Councils
West Lindsey District Council
West Suffolk District Council
West Walton Parish Council
Whaplode Parish Council
Witham Fourth District Internal Drainage Board
Withern with Stain Parish Council

From: [Marie Steed](#)
To: [Grimsby to Walpole](#)
Cc: [Tina Wood](#)
Subject: Scoping Opinion Grimsby to Walpole (EN020036)
Date: 01 September 2024 14:02:26

You don't often get email from [REDACTED]. [Learn why this is important](#)

Comments/suggestions with respect to PINS Scoping Opinion Grimsby to Walpole (EN020036)

National Grid's (NG's) Scoping Report is ostensibly for ONE line of 50m 400kV pylons from Grimsby to Walpole, with new substations at Grimsby and Walpole, and two at Alford ('southwest of Mablethorpe' in all NG documents). The carrying capacity of a single 400kV pylon is less than 7GW but the new projects cited by NG to justify the Grimsby to Walpole proposal total 9.764GW. To accommodate this NG would need at least TWO lines of pylons. Power would also be routed (south) via Grimsby (up to 7GW) into Alford. If this is approved, it is likely that projects already in the planning process (like ODOW) will be rerouted into the Alford substations (why would any project bury cables from Alford to Walpole when there is no need?). In addition, there are numerous large scale (1GW+) solar farms mooted along the proposed route which will also require connection (hence all the rather vague LCS's incorporated in this document). The Alford substations will need capacity for c22GW plus (source NG). Please note that there is no local requirement for any of this new renewable generation, we are already in net spill.

To accommodate all this proposed generation, NG would require TWO 400kV lines from Grimsby to Alford and **three** 400kV lines from Alford to Walpole. Because Grids are designed largely in a 'boxed format' NG would then require a new 400kV line from Alford to Lincoln. According to NG, some 30GW is due to be brought into the B8 boundary. Recently, HMG announced even more ambitious licensing of additional renewable generation, some of which may be landed into the Eastern coast. Alford alone could easily end up as a 40GW plus hub. Accommodating all the export routes south and the various associated onshore facilities would entail vast areas of land being dedicated to electrical facilities. We believe that the proposed **one** set of 400kV pylons and substations really represents the first enabling step for the conversion of vast swathes of rural Lincolnshire (and beyond), into a series of industrial-scale electrical complexes connected by multiple sets of 50m pylons.

To cover the true scale and potential impact of this project, we therefore respectfully request (**requests are inbold**) that the Scoping includes the following:

- 1. The Scoping Area should be extended to cover the whole of the 'Overhead Study Area' as shown in Figure 3.2 of the Scoping Report. (Also, the 'Overhead Study Area' should be enlarged to cover the whole of the potential pylon/associated infrastructure corridors – this is not currently the case – see Fig, 3.2).**

2. The PEIR, EIA and ES study area should extend 5kms from the boundary of the 'Overhead Study Area' and be extended, where appropriate, to the 'Limit of Deviation'. The topography of the route means that this development will have a significant visual and cumulative impact as the landscape, being mainly flat, is highly sensitive to change. The significance of 50m pylons is not mitigated by distance in a flat landscape of large arable fields. If the 'apparent height' of a 50m pylon at 5km is 0.61cm as claimed by the applicant, then a 25m building would appear as 0.31cm. Most structures in the landscape along the route(s) are isolated farm buildings less than 15m high, therefore the visual and cumulative impact of even a single line of pylons and associated infrastructure would be significant. This development would change the landscape character throughout the route.

3. Because of the impact of the proposed development in a (mainly) sparsely populated rural area, **all 'additional measures', 'secondary measures', 'ancillary development' and 'associated ancillary development' should be included in the Scoping and anything (apart from temporary measures necessary for construction), not included within the Scoping and EIA should not be accepted as part of the DCO.** Otherwise, there is a risk that additional lines of pylons and substations (as illustrated in Figures 3.2 & 3.4) are included in the final DCO Application without any public consultation or environmental impact assessment.

4. The Visual Impact study area should be extended to the coast (in particular around the Gibraltar Point NNR); and the eastern edge of the Lincolnshire Wolds AONB.

5. Several Heritage assets of national importance (Grade 1), which are likely to be seriously impacted (i.e. significantly harmed) by the proposed development are not included in the current study area. **All Heritage assets (Listed Buildings, scheduled monuments and listed Parks & Gardens) within 5kms of the 'Overhead Study Area' should be included in the PEIR/EIA/ES.**

6. Photomontages and wirelines for the Visual Impact Assessment should be from viewpoints specifically agreed with local communities from every parish within the Visual Impact Study Area(e.g. Parish Councils; Parochial Church Councils/District Church Councils; walkers/ramblers associations; Parish Meetings; residents etc.; i.e. 'the different groups of people likely to be affected by the project' (Scoping Report 7.18.17).

7. Photomontages and wirelines should be provided in hard copy (printed at the optimal size for viewing), to all Parishes within the Visual Impact study area (minimum 10km radius from the Scoping Area); and on request to any member of the public.Photomontages cannot be properly used by a layperson on a computer screen. (Also, many areas within the route are Wi-Fi blackspots and there is no superfast broadband, so the files are too large to open).

8. All photomontages and wirelines should conform to the Nature Scotland (2017 and updates) Visual Representation of Wind Farms Guidelines. Panoramic photomontages should be accompanied by a single photomontage from the same viewpoint taken at 50mm focal length.

9. There is an overlap between substations LCS 6 & 8 (i.e. LCSB) in the Scoping Report (Figure 3.4), and the siting zone for the convertor station and direct current switching station in National Grid's EGL 3&4 Project Background Document. NG should make it clear which project the proposed developments belong to. Since, **if the Grimsby to Walpole Project is consented, EGL 3 & 4 will be added to the overhead lines (Table 4.3), rather than taking the buried route to Weston Marsh (as currently proposed), then it would surely be most cost-effective to combine the two projects at this stage and extend the Scoping Area and EIA appropriately.**

10. **Full flood risk assessment for inundation of seawater relating to storm surges; collapse of levées; breach of riverbanks; flash flooding etc. should be conducted for the whole (revised) Scoping Area.**

11. Finally, there is a serious issue of broadband availability along the whole route, therefore we request that **in addition to providing the photomontages (see 7 above), the applicant makes all consultation documents freely available in hard copy at locations open to the public during working hours, and at weekends (many libraries in the affected area, Alford for example, only open 4 days a week). The documents should also be made available on free memory sticks provided by NG at public information days, and on request.** Otherwise, many of those most affected by the proposed development will be unable to access the information required to comment on it.

Anderby Parish Council comments/suggestions/objections with respect to PINS Scoping Opinion Grimsby to Walpole (EN020036)

We believe that the plan for pylons is destructive and outdated and will cause irreversible damage to the countryside, wildlife habitats, and local communities and we find the proposal will be detrimental to our beautiful countryside.

We fully support the need to generate renewable and low carbon electricity to meet local and national Net Zero ambitions.

However, there are more suitable, sustainable and modern alternatives for the network that have not been properly investigated and presented, such as undersea cable routes.

In more detail:

National Grid's (NG's) Scoping Report is ostensibly for ONE line of 50m 400kV pylons from Grimsby to Walpole, with new substations at Grimsby and Walpole, and two at Alford (so-called 'southwest of Mablethorpe' in all NG documents). The carrying capacity of a single 400kV pylon is less than 7GW. The new projects cited by NG to justify the project total 9.764GW. To accommodate this NG would need at least TWO lines of pylons. Power would also be routed (south) via Grimsby (up to 7GW) into Alford. If this is approved, it is likely that projects already in the planning process (like ODOW) will be rerouted into the Alford substations (why would any project bury cables from Alford to Walpole when there is no need?).

In addition, there are numerous large scale (1GW+) solar farms mooted along the proposed route which will also require connection (hence all the rather vague LCS's incorporated in this document). The Alford substations will need capacity for 22GW plus (source NG). Please note that there is no local requirement for any of this new renewable generation, we are already in net spill.

To accommodate all this proposed generation, NG would require TWO 400kV lines from Grimsby to Alford and THREE 400kV lines from Alford to Walpole. Because Grids are designed largely in a 'boxed format' NG would then require a new 400kV line from Alford to Lincoln. According to NG, some 30GW is due to be brought into the B8 boundary. Recently, HMG announced even more ambitious licensing of additional renewable generation, some of which may be landed into the Eastern coast. Alford alone could easily end up a 40GW plus hub. Accommodating all the export routes south and the various associated onshore facilities would entail vast areas of land being dedicated to electrical facilities. We believe that this proposed ONE set of 400kV pylons and substations really represents the first enabling step for the conversion of vast swathes of rural Lincolnshire (and beyond), into a series of industrial-scale electrical complexes connected by multiple sets of 50m pylons.

To cover the true scale and potential impact of this project, we therefore respectfully request that the Scoping includes the following:

1. The Scoping Area should be extended to cover the whole of the 'Overhead Study Area' as shown in Figure 3.2 of the Scoping Report. (Also, the 'Overhead Study Area' should be enlarged to cover the whole of the potential pylon/associated infrastructure corridors – this is not currently the case – see Fig, 3.2);

2. The PEIR, EIA and ES study area should extend 5kms from the boundary of the 'Overhead Study Area' and be extended, where appropriate, to the 'Limit of Deviation'. The topography of the route means that this development will have a significant visual and cumulative impact as the landscape, being mainly flat, is highly sensitive to change. The significance of 50m pylons is not mitigated by distance in a flat landscape of large arable fields. If the 'apparent height' of a 50m pylon at 5km is 0.61cm as claimed by the applicant, then a 25m building would appear as 0.31cm. Most structures in the landscape along the route(s) are isolated farm buildings less than 15m high, therefore the visual and cumulative impact of even a single line of pylons and associated infrastructure would be significant. This development would change the landscape character throughout the route;

3. Because of the impact of the proposed development in a (mainly) sparsely populated rural area, all 'additional measures', 'secondary measures', 'ancillary development' and 'associated ancillary development' should be included in the Scoping and anything (apart from temporary measures necessary for construction), not included within the Scoping and EIA should not be accepted as part of the DCO. Otherwise, there is a risk that additional lines of pylons and substations (as illustrated in Figures 3.2 & 3.4) are included in the final DCO Application without any public consultation or environmental impact assessment;

4. The Visual Impact study area should be extended to the coast (in particular around the Gibraltar Point NNR); and the eastern edge of the Lincolnshire Wolds AONB;

5. Several Heritage assets of national importance (Grade 1), which are likely to be seriously impacted (i.e. significantly harmed) by the proposed development are not included in the current study area. All Heritage assets (Listed Buildings, scheduled monuments and listed Parks & Gardens) within 5kms of the 'Overhead Study Area' should be included in the PEIR/EIA/ES;

6. Photomontages and wirelines for the Visual Impact Assessment should be from viewpoints specifically agreed with local communities from every parish within the Visual Impact Study Area (e.g. Parish Councils; Parochial Church Councils/District Church Councils; walkers/ramblers associations; Parish Meetings; residents etc.; i.e. 'the different groups of people likely to be affected by the project' (Scoping Report 7.18.17);

7. Photomontages and wirelines should be provided in hard copy (printed at the optimal size for viewing), to all Parishes within the Visual Impact study area (minimum 10km radius from the Scoping Area); and on request to any member of the public. Photomontages cannot be properly used by a layperson on a computer screen. (Also, many areas within the route are Wi-Fi blackspots and there is no superfast broadband, so the files are too large to open).

8. All photomontages and wirelines should conform to the Nature Scotland (2017 and updates) Visual Representation of Wind Farms Guidelines. Panoramic photomontages should be accompanied by a single photomontage from the same viewpoint taken at 50mm focal length.

9. There is an overlap between substations LCS 6 & 8 (i.e. LCSB) in the Scoping Report (Figure 3.4), and the siting zone for the convertor station and direct current switching station in National Grid's EGL 3&4 Project Background Document. NG should make it clear which project the proposed developments belong to. Since, if the Grimsby to Walpole Project is consented, EGL 3 & 4 will be added to the overhead lines (Table 4.3), rather than taking the buried route to Weston Marsh (as currently proposed), then it would surely be most cost-

effective to combine the two projects at this stage and extend the Scoping Area and EIA appropriately.

10. Full flood risk assessment for inundation of seawater relating to storm surges; collapse of levées; breach of riverbanks; flash flooding etc. should be conducted for the whole (revised) Scoping Area.

11. Finally, there is a serious issue of broadband availability along the whole route, therefore we request that in addition to providing the photomontages (see 7 above), the applicant makes all consultation documents freely available in hard copy at locations open to the public during working hours, and at weekends (many libraries in the affected area, Alford for example, only open 4 days a week). The documents should also be made available on free memory sticks provided by NG at public information days, and on request. Otherwise, many of those most affected by the proposed development will be unable to access the information required to comment on it.

Potential impacts on the landscape:

- It will carve off the nearby popular coastal resorts of Mablethorpe, Sutton-on-Sea, Sandilands and Anderby Creek from the Lincolnshire Wolds National Landscape (an area of outstanding natural beauty) and may mean our Parish's Tourists, of which local businesses depend, will in future choose to visit The Wolds, or The Coast, rather than holidaying in the Parish to visit both. There needs to be a detailed impact assessment on the Lincolnshire Wolds area of outstanding natural beauty (AONB)
- As in our response at the 'non-statutory consultation' phase to National Grid, we do not feel National Grid have adequately accurately assessed other options of an offshore integrated grid or undergrounding as alternatives.
- The uncertainty around the siting of proposed pylons and substations should be cleared up so that residents understand exactly the potential impacts.
- We support cleaner and more secure forms of energy but not at any cost to the environment and residents. Pylons are an archaic infrastructure system blighting the landscape for decades.

Potential impacts on natural environments:

- The EMF of the pylons will interfere with bee hives on land beneath (which are needed for pollination of crops) and bats navigation, which reside in Rigsby Wood and Ailby Plantation.
- Risks harming our Parish' Barn Owl population and migrating Canadian Geese that fly over the Parish could be adversely affected too.
- We are close to a migratory superhighway for millions of birds, the cables would risk their harm too.
- The land in the Parish is predominantly agricultural and any soil compaction during construction would affect the productivity going forwards.
- The lifespan of the infrastructure needs careful consideration in regard of being subject to strong gusts of winds off the North Sea/regular Sea Fret exposure.
- Impact on protected species such as great crested newts, reptiles, birds, water voles, badgers and bats.

Potential impacts on residents:

- The effect of land and property owners' mental health is of great concern, adding to the stress both mentally and physically farmers are already under. 100% of homeowners in the Parish voted against this proposal at our Parish Meeting in February 2024.
- Adverse impact on value/profitability of the Parish's (and surrounding) land and property.

Devaluation of property putting residents at risk of negative equity.

- Noise pollution from Sea Fret hitting the cables on a regular basis and this being more likely overnight when people are trying to sleep.
- Disruption for residents in their commute to school/work (and tourists in their holiday travel) during the construction period.
- What steps will be taken to prevent Mirco-shocks for residents & tourists who walk, cycle, horse-ride or fish in the area?
- Light pollution adversely impacting residents as properties of a particular rural nature with far reaching views.
- Where exactly will the two proposed substations be located? Require a detailed explanation of construction activities especially if any will take place at night and the landscape measures to be taken around the sub stations and pylons. There will be an adverse impact on residents in terms of light, views and noise.

Potential impacts on businesses:

- Our predominant industries are Farming & Tourism. Disruption to holiday makers during construction and reduced appeal of the region once constructed will mean reduced visitor numbers = less profitability/viability = less employment for local population.
- Loss of prime agricultural land / land less productive due to soil compaction/disturbance, giving concern for future food security. What steps will be taken to ensure that harvests can continue during construction?
- Need to understand the effect of maintenance via helicopter, vehicle and drone activities.

Potential impacts on existing infrastructure:

- During construction there will be many large heavy vehicles on narrow country lanes, what steps will be taken to mitigate the disruption to rural transport links, damage to the already crumbling county roads?
- Potential for narrow lanes to subside under the weight of heavy plant possibly contaminating watercourses and causing flood risk.
- Traffic impacts should be assessed for both construction and operational activities.

Potential safety risks:

- What measures will be put in place during construction and beyond to mitigate the risks to workforce and residents, given that many areas are rural and emergency response times slow?
- Flying exercises by military in the area and the Lincolnshire Gliding Club at nearby Strubby North Airfield that sometimes has craft pass over to our Parish.

- Has a fire risk assessment of the pylons and wires been conducted especially since they run across agricultural land which is highly flammable both pre- and post-harvest of grain crops.



Anglian Water Services

Thorpe Wood House
Thorpe Wood
Peterborough
PE3 6WT

www.anglianwater.co.uk

Our ref ScpR.G2W.NSIP.24.ds

Hannah Terry
Senior EIA Advisor
The Planning Inspectorate

grimsbytowalpole@planninginspectorate.gov.uk

29 August 2024

Dear Hannah

**Grimsby to Walpole Project (G2W)
EIA Scoping Report consultation**

Thank you for the opportunity to comment on the scoping report for the above project, which runs through North East Lincolnshire, West Lindsey, East Lindsey, North Kesteven, Boston, South Holland, Fenland and Kings Lynn & West Norfolk.

Anglian Water (AWS) is the appointed water and sewerage undertaker for all the project route corridor shown on figure 1.1. The following response is submitted on behalf of AWS in its statutory capacity and relates to water resources, the water supply network, water recycling centres, water recycling assets and the sewer network and the related role of surface drainage.

In view of the potential impacts on water resources, National Grid as the promoter would be advised to consider the published Water Resources East [Regional Plan](#) which sets out the collective water companies position. The AWS draft Water Resource Management Plan (WRMP) is available on our [website](#). Anglian Water's final WRMP will be published following final determination by Ofwat in December 2024. A copy of the AWS Non-Domestic Water supply position paper is attached. In summary, this means that the project's EIA will need to consider water resources and water efficiency and that a Water Resources Assessment (WRA) will be required to be produced by the project and agreed with AWS. AWS recommends that the WRA is an integral part of Chapter 10 Water Environment. The AWS WRMP should therefore be added to the Data Sources listed in Table 10.2.

AWS support the UK's Great Grid Upgrade in principle, recognising the imperative to swiftly increase transmission capacity to enable the decarbonisation of the grid in the country's move to a more sustainable future and to address climate change. The upgrade of the network through the Anglian Water region will support AWS's delivery of net zero by 2030 through our own renewable energy projects. Improved capacity across the region will also provide additional resilience for energy supply including to AWS sites in the face of more extreme weather events. Given the linear nature of the G2W project, the National Grid team may want to consider the 500km Anglian Water [Strategic Pipeline Alliance](#) project. A draft SLA will be sent to National

Registered Office
Anglian Water Services Ltd
Lancaster House, Lancaster Way,
Ermine Business Park,
Huntingdon,
Cambridgeshire. PE29 6XU
Registered in England

Grid to update and return so that AWS can support the project through pre-application to DCO decision stage including technical, planning, legal and property advice to assist the project.

The Scheme – Existing and Proposed infrastructure

There are significant existing AWS water supply, water recycling and network assets which serve towns and villages along the route including Grimsby, Louth, Boston and Spalding. For example to the west of Spalding there are five water supply pipelines in close proximity running west to east to the north of the A151 including major pipelines of 710mm diameter. Other assets in the corridor include the Louth Wastewater Recycling Centre (WRC) which serves a growing population, and its function and expansion is protected through protective provisions and agreements with the Viking CCS NSIP. There are several abstraction locations along the route corridor (North and Central section) including at Healing, Churchthorpe, Covenham and Bilsby. AWS's own NSIP reservoir projects in Lincolnshire (to the west of the corridor) and Fens (to the south of the corridor) are also highly likely to have associated infrastructure (8.5.23) which would cross the G2W project corridor.

As there are multiple locations for potential asset interactions, where changes to project asset locations could avoid impacts and diversions, the project is advised to start liaison with our Asset Diversions team. We would urge that early consideration and assessment is given to minimising the need to disrupt or divert utility assets which has a carbon impact and increases the risk of service disruption. Maps of Anglian Water's assets are available to view at the following address:

<http://www.digdat.co.uk/>

We note and welcome that at 10.3.1 the promoter references proposed consultation and engagement with Anglian Water. We also welcome reference to the AWS joint work with the Environment Agency (EA) on the Lincolnshire reservoir (Table 10.1. page 10.7).

AWS welcomes the recognition of risks from the project to water and wastewater infrastructure (Page xi, Definitions and 11.5.51). The assessed level of significance provides initial comfort to AWS that the protections, liaison and construction approach will minimise and indeed potentially remove such risk.

The Scoping Report refers to the use of trenches (4.8.29) and trenchless methods (4.8.42). AWS requires that the following standoff distances are applied for working each side of the medial line of AWS pipes. The text is drawn from our template Protective Provisions which will need to be agreed with AWS prior to the DCO submission.

- (a) 4 metres where the diameter of the pipe is less than 250 millimetres.
- (b) 5 metres where the diameter of the pipe is between 250 and 400 millimetres, and
- (c) a distance to be agreed on a case-by-case basis and before the submission of the Plan under sub-paragraph (1) is submitted where the diameter of the pipe exceeds 400 millimetres.

The Construction Management Plan (8.6.9) should include steps to remove the risk of damage to AWS assets from vibration, plant and machinery including haul roads. AWS supports the use of geophysical surveys for archaeology to provide a preliminary assessment of the location of assets and to enable design and location choices such as pylon placement. We recommend that the project follow the same approach as the Bramford to Twinstead project and provide a plan and GIS layer showing all Anglian Water asset interactions. This can for example enable pylons and works areas to be amended to remove any interactions and risks from vibration during the

projects construction. Further advice on minimising impacts and then relocating Anglian Water existing assets can be obtained from:

connections@anglianwater.co.uk

A template set of Protective Provisions including the above will be sent to promoter with a view to establish the bespoke distances for any pipes that exceed 400 millimetres should design and route iteration prove unable to avoid work in the vicinity of Anglian Water pipes.

New connections

As set out at the start of our response the position on water supply for non- domestic use during construction and operation has changed in the past 18 months. AWS requires that the project seek to minimise its demand for water and records this in its Water Resource Assessment (WRA) in the EIA. AWS recommends that new water supply connections are not sought during construction and that potable water supply for welfare facilities, for example, are served by tanker to reduce the embedded (capital) carbon from providing new connections.

- Chapter 10. Water Environment

At 10.5.14, the Scoping Report references the water supply and wastewater services provided by water features in the study area. At 10.5.40, reference is made to abstractions to supply agricultural water uses. Paragraph 10.5.81 refers to the water supply services provided by the River Welland. Given the approach taking on other linear projects AWS would welcome clarification that the G2W project will sourcing non potable water supplies, for dust suppression (Table 8.4, 8-44) and vehicle washing (GG17, 8-36) for example, from local abstraction rather than the public water supply.

AWS would also welcome confirmation that there will be no temporary concrete batching facilities (bullet 7, 10.7.3) with their consequent water demands. If so then the project's WRA can record that only potable supply (possibly tanker supply) is required for permanently staffed operational stage facilities as potable water for construction stages will be brought in by tanker (CC03, page 18-11). AWS welcomes the recognition in Tables 10.7 and 10.8 of the critical importance of public water supply. We note the factual summary on water supply and Source Protection Zones (11.5.10 to 11.5.12). AWS welcomes confirmation (10.7.10) that there will be 'no new consumptive water uses' during operational stages. We support the inclusion of water in the CEMP (GC04, 12.6.4).

Given the uncertainty on water usage, AWS does not support the Scoping Out of water use (B6-B7, 20-61) and requires that a Water Resources Assessment to be included in the EIA.

We note at Table 10.1 page 10.8 that the EA advise on the need to consider sewer connections and so by extension WRC capacity. At bullet point 10, 4.8.6, grey and foul water is referred a typical constriction compound. It is not clear how this will be managed, and this could be to SuDS for grey water (4.8.15 and 10.7.13) and to self-contained and then tanker away solutions for foul water. We also note that the Scoping Report is not clear (GG16, page 10-27, W05, page 10-29 and 10.5.76) whether new sewer connections will be sought for the construction stage. AWS welcomes that SuDS will be used for the project (W11, 10-29). At 4.8.46 we note that New Substations would (could?) require permanent foul drainage as well as oily water and surface water drainage. AWS would welcome confirmation that no new public sewer connections will be sought and that the location of the substations (in part to minimise other impacts) supports off public sewer network solutions.

AWS supports the approach (Table 20.13, Page 20-58) on assessing GHG emissions including those emissions associated from any onsite construction-related activities. This would support the evidenced based evolution of the design of the project to reduce interactions with existing utilities infrastructure and the removal the need for new water and wastewater connections during construction and then operational stages.

Next steps

Anglian Water would welcome the progression of discussions with National Grid as the prospective applicant, in line with the requirements of the 2008 Planning Act and guidance. Experience has shown that early engagement and agreement is required between NSIP applicants and statutory undertakers during design and assessment and well before submission of the draft DCO for examination. Consultation at the statutory PEIR stage would in our view be too late to inform design and may result in delays to the project. We would recommend discussion on the following issues:

1. Impact of development on Anglian Water's water and water recycling assets
2. The design of the project to minimise interaction with Anglian Water assets and specifically to avoid the need for diversions which have carbon costs
3. Requirement for water supply connections (if any) and the inclusion of the Water Resources Assessment in the draft EIA
4. Requirement for water recycling connections (if any)
5. Confirmation of the project's cumulative impacts (if any) with Anglian Water projects
6. Draft Protective Provisions and Requirements

Further advice wastewater capacity and options can be obtained by contacting Anglian Water's Pre-Development Team at:

planningliasion@anglianwater.co.uk

The application will be managed by myself and so please do not hesitate to contact me should you require clarification on the above response or during the pre- application to decision stages of the project.

Yours sincerely,



Darl Sweetland DMS MRTPI
Spatial Planning Manager

cc National Grid Electricity Transmission c/o

 [@arup.com](mailto: [redacted]@arup.com)

Scoping Opinion

August 2024

With reference to,

Application for a Development Consent Order (DCO)

Project: Grimsby to Walpole Great Grid Upgrade

Applicant: National Grid Electricity Transmission

Submitted by: Ashby cum Fenby Parish Council



Contents

Section	Description	Page
-	Introduction	3
-	Executive Summary	4
1.0	Landscape and Visual Impact Assessment	5
2.0	Ecological and Biodiversity Impact	8
3.0	Cultural Heritage and Archaeology	11
4.0	Community and Socio-Economic Impacts	14
5.0	Alternative Options Analysis	17
6.0	Cumulative and In-Combination Effects	19
7.0	Considerations for Horses, Bridleways and Equestrian Activity	22
8.0	Request for Diligent Use of the Quality of Life Capital (QoLC) Tool	24
9.0	Conclusion	26

Introduction:

Ashby cum Fenby is a small rural parish located in North East Lincolnshire, characterised by its tranquil landscape, rich biodiversity, and deep historical roots. The parish is enveloped by agricultural fields, woodlands, and small watercourses that collectively create a diverse and thriving habitat for a wide range of wildlife. This setting is not just a backdrop but a defining feature of the community's identity and way of life. The proposed erection of 400kV overhead transmission lines as part of the Grimsby to Walpole project presents significant risks to this delicate and cherished environment—risks that could profoundly alter the character and ecological integrity of Ashby cum Fenby and surrounding areas both during construction and throughout the operational life of the infrastructure.

The Ashby cum Fenby Parish Council (the Parish Council) welcomes this opportunity to submit a Scoping Opinion, and it does so with a clear and resolute stance: the Environmental Statement (ES) must be thorough, credible, and transparent in its assessment of the potential impacts of this project. The Parish Council has strong concerns that without diligent study and consideration, the proposed development could have severe and lasting negative effects on the local environment, ecology, landscape, and the overall well-being of the community.

The Parish Council insists that the Environmental Statement accompanying the Development Consent Order (DCO) application should be comprehensive, leaving no stone unturned in its examination of the potential adverse effects. The Council's position is that full consideration must be given to alternative solutions to overhead lines, with a rigorous assessment of the cumulative environmental costs over time, as opposed to merely focusing on immediate monetary savings and future maintenance expenditures. This is not a matter of preference but of necessity to ensure that the unique character and ecological richness of Ashby cum Fenby and surrounding areas are preserved for future generations.

The Parish Council strongly believes that the Environmental Statement (ES) accompanying the Development Consent Order (DCO) application should suitably consider in detail and as a minimum the key areas outlined in this document.

Executive Summary

The Ashby cum Fenby Parish Council has undertaken a comprehensive review in response to the proposed Grimsby to Walpole project by National Grid Electricity Transmission. The focus of this Scoping Opinion is to ensure that the Environmental Statement (ES) accompanying the Development Consent Order (DCO) application thoroughly addresses a full range of potential impacts on the local environment, ecology, landscape, cultural heritage, community well-being, and socio-economic conditions within Ashby cum Fenby and its surrounding areas.

Ashby cum Fenby, a small rural parish in North East Lincolnshire, is known for its tranquil landscape, rich biodiversity, and deep historical roots. The introduction of 400kV overhead transmission lines poses significant risks to these valued attributes, potentially leading to substantial visual, ecological, and socio-economic impacts. The Parish Council emphasises the need for a rigorous exploration of alternative solutions, particularly underground cabling, to minimise these adverse effects.

Key areas of concern include the impact on landscape character, the disruption to local flora and fauna, the potential harm to heritage assets like St. Peter's Church, and the threat to community well-being through visual intrusion, noise, and potential declines in property values. The Parish Council also highlights the importance of assessing cumulative impacts in conjunction with other regional projects such as the Viking CCS, and advocates for the diligent use of the Quality of Life Capital (QoLC) Tool to ensure that all aspects of community well-being are fully considered.

1.0 Landscape and Visual Impact Assessment

1.1 Landscape Character

The ES must undertake a comprehensive assessment of the impact that the proposed 400kV overhead transmission lines will have on the landscape character of Ashby cum Fenby and its surrounding areas. The parish's proximity to the Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB) is particularly significant. The Lincolnshire Wolds AONB is recognised for its national importance due to its distinctive rolling hills, open fields, and tranquil rural scenery, which have remained largely unspoiled by modern development.

1.1.1 Disruption to Rural Character

The introduction of towering overhead transmission lines would be highly incongruent with the existing rural character of the area. The visual contrast between the modern, industrial structures of the pylons and the traditional, agricultural landscape would be stark and jarring. This alteration would be particularly noticeable in the open fields and low-lying areas where the expansive views are a defining characteristic of the landscape.

Ashby cum Fenby's rural identity, characterised by its gently rolling farmland and historic field boundaries, would be significantly undermined by the presence of these large-scale industrial structures. The sense of place that residents and visitors associate with the area, which is tied to its agricultural heritage and scenic beauty, would be eroded.

1.1.2 Impact on Local Flora and Fauna

The landscape of Ashby cum Fenby is not only visually appealing but also supports a diverse range of flora and fauna, some of which are likely to be sensitive to changes in the landscape. The physical presence of pylons and any associated maintenance paths required for them could lead to habitat disruption, particularly in areas of hedgerows and small woodlands that serve as wildlife corridors.

1.2 Key Viewpoints and Sensitivity

The ES should prioritise the identification and analysis of key viewpoints within Ashby cum Fenby that would be most affected by the proposed overhead transmission lines. Specific locations to consider include, but are not limited to:

1.2.1 Ashby Lane

Ashby Lane is a key route within the parish that offers unobstructed views across the surrounding countryside. The introduction of pylons along this route would significantly alter these views, replacing the rural landscape with a more industrial vista. The experience of traveling along this road, which currently offers a connection with the natural landscape, would be diminished.

1.2.2 Main Road

Main Road, being one of the primary thoroughfares through the village, is frequently used by both locals and visitors. The pylons, visible from this road, would disrupt the visual experience for motorists, cyclists, and pedestrians, particularly where the road crosses or runs parallel to open fields.

1.2.3 Barton Street

The unspoiled views from Barton Street, Willow Lakes, and the Landmark Restaurant are of considerable value, both aesthetically and economically. The introduction of 400kV overhead transmission lines would have a significant adverse effect on these key viewpoints, potentially altering the character of the area and reducing its appeal to visitors. The Parish Council strongly recommends that the ES includes a detailed and rigorous assessment of these impacts, supported by visual simulations, and fully explores alternative solutions to preserve the visual integrity of this cherished landscape.

1.2.4 Local Footpaths and Bridleways

The footpaths and bridleways around Ashby cum Fenby are popular with walkers and riders who come to enjoy the peaceful countryside. These routes offer views that are highly valued for their tranquillity and natural beauty. The imposition of overhead lines and pylons would not only be a visual intrusion but could also affect the recreational use of these paths, as users may find the altered landscape less appealing.

1.2.5 Assessment Tools

The ES should employ visual impact assessments that include detailed photomontages and computer-generated models to accurately depict the scale and visual impact of the proposed transmission lines from these key viewpoints. This approach will help in understanding the full extent of the visual intrusion and its implications for both residents and visitors.

1.3 Cumulative Visual Impact

The cumulative visual impact of the proposed overhead transmission lines must be thoroughly assessed in the context of existing infrastructure and any other planned developments in the region.

This is particularly important because the landscape around Ashby cum Fenby is currently free from large-scale industrial infrastructure. Introducing overhead transmission lines could set a precedent for further development, leading to a gradual erosion of the rural landscape character over time. The ES should consider how proposed pylons will interact visually with existing local structures, such as smaller power lines or communication assets, to assess the cumulative effect on the landscape.

1.3.1 Planned Developments

The ES should also take into account any planned developments in the area, including new housing projects, highway expansions, energy/utility services, decarbonisation projects or

agricultural developments. The combined visual impact of these, alongside the proposed transmission lines, could lead to a more fragmented and less coherent landscape, reducing the overall aesthetic and recreational value of the area.

1.4 Mitigation Measures

Given the potential significant adverse effects of overhead transmission lines on the landscape and visual amenity of Ashby cum Fenby, the ES should explore all feasible mitigation measures, including:

1.4.1 Underground Cabling

One of the most effective mitigation strategies would be to place the transmission lines underground. Although this option may involve higher initial costs, the long-term benefits in terms of preserving the landscape character, reducing visual intrusion, and protecting the area's ecological and recreational value could outweigh these costs over time. The ES should provide a detailed analysis of underground cabling's technical feasibility, environmental benefits, and economic implications.

1.4.2 Alternative Route Planning

If underground cabling is not deemed feasible for the entire route, the ES should explore alternative routes for the overhead lines that would minimise their visual impact or consider undergrounding of sections to preserve key areas. This could involve routing the lines through less sensitive areas or avoiding key viewpoints altogether.

1.4.3 Visual Screening

The use of visual screening, such as strategically planted trees or hedgerows, should be considered. While this may not eliminate the visual impact, it could help to soften the intrusion and reduce the starkness of the pylons in the landscape, but this should be modelled to assess the likelihood of effectiveness and subsequently illustrated.

1.4.4 Community Consultation:

Engaging with the local community to identify specific concerns and preferences regarding mitigation measures is crucial. The ES should document these consultations and consider incorporating community feedback into the final mitigation strategy. This collaborative approach would help ensure that the measures implemented are responsive to the needs and values of the residents of Ashby cum Fenby and surrounding areas.

1.5 Conclusion - Section 1.0

The Landscape and Visual Impact Assessment within the ES should be both thorough and sensitive to the unique characteristics of Ashby cum Fenby. Given the area's proximity to the Lincolnshire Wolds AONB, the rural character, and the high landscape value, any development of overhead transmission lines poses significant risks to the visual amenity and environmental integrity of the area. The Parish Council strongly advocates for the careful

consideration of alternative solutions, such as underground cabling, and for the diligent assessment of cumulative impacts and mitigation measures to protect this valued landscape.

2.0 Ecological and Biodiversity Impact

2.1 Habitats and Species

The ES must include a thorough and detailed assessment of the ecological and biodiversity impacts that the proposed 400kV overhead transmission lines could have on the diverse range of habitats and species found within Ashby cum Fenby and the surrounding areas. The parish is characterised by a mosaic of habitats, including hedgerows, small woodlands, watercourses, and agricultural fields, all of which support a variety of wildlife, some of which are protected or of conservation concern.

2.2 Specific Habitats in Ashby cum Fenby

Hedgerows: The hedgerows in and around Ashby cum Fenby are particularly significant as they serve as important wildlife corridors, allowing animals to move safely between different habitats. These hedgerows are often ancient and species-rich, providing shelter and food sources for birds, insects, and small mammals. The construction of overhead transmission lines could lead to the loss or degradation of these hedgerows, impacting the species that rely on them.

Small Woodlands: The small woodlands dotted around the parish are crucial habitats for a variety of wildlife, including birds, bats, and small mammals. These woodlands often contain mature trees that are important for nesting birds and roosting bats. The installation of pylons and the subsequent clearing of vegetation for maintenance access could result in the destruction of key habitats within these woodlands.

Agricultural Fields: The agricultural fields surrounding Ashby cum Fenby are not only valuable for crop production but also provide habitats for ground-nesting birds and foraging grounds for raptors like kestrels and barn owls. The introduction of tall pylons could alter the behaviour of these species, potentially leading to changes in foraging patterns or displacement from traditional nesting sites.

2.2.1 Birds

The area around Ashby cum Fenby is known for its rich birdlife, including several species that could be particularly vulnerable to the impacts of overhead transmission lines:

Barn Owls (*Tyto alba*): Barn owls are frequently observed in the open fields and along the hedgerows of Ashby cum Fenby. These birds of prey rely on low-level hunting flights to capture small mammals. The presence of overhead lines presents a significant collision risk for barn owls, particularly during low-light conditions when they are most active.

Kestrels (*Falco tinnunculus*): Kestrels are another common sight in the area, often seen hovering over fields in search of prey. The tall structures associated with overhead transmission lines could disrupt their hunting patterns and increase the risk of collision, especially for juveniles that are less adept at navigating obstacles.

Skylarks (*Alauda arvensis*): Skylarks, which are ground-nesting birds, are known for their distinctive song flights. The open fields around Ashby cum Fenby provide ideal breeding grounds for these birds. However, the introduction of pylons could lead to habitat disruption and displacement, particularly if construction activities disturb nesting sites.

Migratory Birds: The area also serves as a corridor for migratory birds. Overhead transmission lines could pose a collision risk for these species, especially during migration periods when large numbers of birds pass through the area. The ES should include a seasonal analysis of bird movements to assess the potential risks to migratory species.

2.2.2 Bats

Ashby cum Fenby is likely home to several species of bats, which utilise the hedgerows, woodlands, and agricultural landscapes for foraging and roosting:

Common Pipistrelle (*Pipistrellus pipistrellus*) and Other Bat Species: Bats rely on linear features like hedgerows and woodland edges to navigate and forage. The introduction of tall pylons could disrupt these flight paths, potentially leading to habitat fragmentation. Additionally, the electromagnetic fields (EMFs) generated by high-voltage lines might interfere with the echolocation abilities of bats, further impacting their ability to forage and navigate effectively.

Roosting Sites: The mature trees in the area could also serve as roosting sites for bats. The clearing of vegetation for pylon installation and maintenance could result in the loss of these critical roosting sites, leading to a decline in local bat populations.

2.2.3 Protected Species

Several protected species may be present in the Ashby cum Fenby area, including:

Badgers (*Meles meles*): Badgers are known to inhabit the area, utilising the hedgerows and woodlands for foraging and sett-building. The construction and maintenance of overhead lines could lead to the disturbance or destruction of badger setts, which are protected under UK law.

Great Crested Newts (*Triturus cristatus*): If present, great crested newts could be at risk from habitat disruption, particularly in areas with ponds or damp, low-lying fields that serve as breeding sites. The loss of connectivity between these habitats due to infrastructure development could severely impact their populations.

Reptiles: Species such as slow worms and grass snakes, which are often found in the rough grasslands and hedgerows, could also be affected by habitat fragmentation and loss of cover due to the construction of pylons.

2.3 Habitat Fragmentation

The potential for habitat fragmentation caused by the installation of overhead transmission lines and the associated infrastructure is a major concern in the Ashby cum Fenby area:

Wildlife Corridors: The hedgerows and small woodlands that crisscross the landscape are vital wildlife corridors that facilitate the movement of species between habitats. The construction of pylons could lead to breaks in these corridors, isolating wildlife populations and reducing genetic diversity.

Impact on Connectivity: The reduction in habitat connectivity could have cascading effects on the local ecology, including increased vulnerability to predators, reduced access to food resources, and challenges in finding suitable mates. This fragmentation could lead to long-term declines in local wildlife populations.

2.4 Mitigation Strategies

Given the potential significant adverse impacts on the local ecology and biodiversity, the Parish Council strongly advocates for the exploration of underground cabling as a primary mitigation strategy:

Underground Cabling: Installing cables underground would preserve the integrity of habitats, maintain wildlife corridors, and reduce the visual impact on the landscape. While this option may involve higher initial costs, the long-term benefits to biodiversity and landscape character are considerable.

Creation of New Habitats: If overhead lines are deemed necessary, the ES should detail specific mitigation measures such as the creation of new habitats to offset losses. This could include planting new hedgerows, creating ponds for amphibians, and managing woodland areas to enhance biodiversity.

Habitat Management Plans: The ES should also include a comprehensive habitat management plan to ensure that any impacts on local wildlife are minimised during both the construction and operational phases of the project. This could involve timed construction activities to avoid sensitive periods, such as bird nesting seasons, and ongoing monitoring of wildlife populations.

2.5 Conclusion - Section 2.0

The ecological and biodiversity impacts of the proposed 400kV overhead transmission lines in Ashby cum Fenby are significant and wide-ranging. The area's diverse habitats and species, some of which are protected, could be severely affected by habitat loss, fragmentation, and the risks associated with overhead structures. The Parish Council urges a thorough and detailed assessment within the ES, supported by robust mitigation strategies, to protect the ecological integrity of Ashby cum Fenby and ensure that the local wildlife continues to thrive.

3.0 Cultural Heritage and Archaeology

3.1 Impact on Heritage Assets

The ES must conduct a thorough assessment of the potential impact that the proposed 400kV overhead transmission lines could have on both designated and non-designated heritage assets within and around Ashby cum Fenby. This village, with its deep historical roots and largely unspoiled rural character, contains several important heritage assets that contribute to its unique identity. The introduction of large-scale, modern infrastructure such as overhead transmission lines has the potential to significantly alter the historical and cultural landscape, which has remained relatively unchanged for centuries.

St. Peter's Church (Grade II Listed) - 1346925:*

St. Peter's Church, a Grade II* listed building, is one of the most significant heritage assets in Ashby cum Fenby. Dating back to the medieval period, this church is not only a place of worship but also a landmark of historical and architectural importance. The church's setting, surrounded by open fields and approached by traditional rural lanes, is integral to its historical significance.

The visual intrusion of overhead transmission lines would have a profound impact on the setting of St. Peter's Church. The towering pylons, which would be visible from various angles around the church, could detract from the sense of continuity with the past that the site currently provides. The contrast of ancient architecture with modern industrial structures would undermine the church's historical context, diminishing its value as a heritage asset.

3.1.1 Other Heritage Assets

In addition to St. Peter's Church, Ashby cum Fenby and its surrounding areas are home to several other heritage assets, including historic farmhouses, traditional cottages, and ancient field boundaries. These structures contribute to the overall historical landscape, which reflects the agricultural heritage of the region.

The impact on non-designated heritage assets, such as the medieval field systems or old pathways, should also be assessed. These elements of the landscape are often overlooked but are crucial in understanding the historical development of the area. The introduction of pylons and overhead lines could disrupt these historical features, leading to a loss of cultural continuity and a fragmentation of the historic landscape.

3.2 Setting and Context

The setting and context of heritage assets are as important as the assets themselves, especially in a place like Ashby cum Fenby, where the landscape plays a significant role in the historical narrative of the area. The ES should carefully evaluate how the overhead transmission lines would alter the setting of these heritage assets, taking into account both direct and indirect effects on the cultural landscape.

3.2.1 Visual Impact on the Cultural Landscape

The visual impact of the proposed transmission lines is not limited to the immediate vicinity of individual heritage assets. The broader cultural landscape, characterised by its open, agricultural nature, is itself a heritage asset that tells the story of centuries of farming and rural life. The introduction of overhead lines would fragment this landscape, creating a inharmonious visual element that is out of place in a setting defined by its historical continuity.

The sense of place in Ashby cum Fenby is closely tied to its visual and historical integrity. The uninterrupted views of the countryside, which have remained largely unchanged for generations, are a key aspect of the village's cultural significance. Overhead transmission lines would disrupt these views, particularly from key vantage points such as the churchyard of St. Peter's Church, where the congregation and visitors alike can currently experience the landscape much as it would have appeared hundreds of years ago.

3.2.2 Indirect Effects on Heritage Assets

The indirect effects of the overhead transmission lines on the cultural landscape could include a decrease in the perceived historical value of the area. For example, visitors to Ashby cum Fenby who come to experience its heritage and rural tranquillity might find the presence of large pylons incongruent with the historical narrative they seek to engage with. This could lead to a decline in heritage tourism, which is an important aspect of the local economy and community identity.

The psychological and emotional connection that residents and visitors have with the heritage assets of Ashby cum Fenby could be eroded by the visual presence of overhead transmission lines. The church, the farmhouses, and the historic landscape are all part of a cultural continuum that links the present day with the past. The introduction of modern infrastructure could break this continuum, leading to a disconnection from the historical roots that define the village.

3.2.3 Agricultural Heritage and Landscape Continuity

The agricultural landscape around Ashby cum Fenby is not just a backdrop but a living part of the village's cultural heritage. The patterns of fields, hedgerows, and lanes that crisscross the area are the result of centuries of farming practices. Overhead transmission lines, with their need for clear corridors and maintenance access, could disrupt these patterns, leading to a loss of traditional land use and the erosion of the cultural landscape.

The ES should assess how the proposed development might impact the continuity of this agricultural heritage. This includes considering how the installation and maintenance of overhead lines could alter the physical landscape, from the removal of ancient hedgerows to the potential abandonment of certain fields that are disrupted by pylons. The loss of these historical elements would represent a significant cultural and ecological loss to the area.

3.3 Mitigation Measures

Given the significant potential impacts on the cultural heritage and historical context of Ashby cum Fenby, the ES must explore all possible mitigation measures to preserve the integrity of these assets.

3.3.1 Underground Cabling

The most effective mitigation strategy would be the use of underground cabling. By avoiding the visual intrusion of pylons, underground cables would preserve the historic landscape and the setting of heritage assets like St. Peter's Church. This approach, though likely more costly, would protect the cultural heritage of Ashby cum Fenby for future generations.

3.3.2 Sensitive Routing

If undergrounding is proven to be not technically feasible, the routing of overhead lines should be carefully considered to minimise the visual impact on heritage assets. This could involve placing lines further away from key historical sites, using existing natural features like woodlands to screen the pylons from view, or choosing routes that avoid crossing open landscapes directly visible from heritage sites.

3.3.3 Landscape and Heritage Conservation Plans

The ES should also propose a comprehensive landscape and heritage conservation plan that includes measures to protect and enhance the setting of heritage assets. This might involve restoring or reinforcing traditional landscape features, such as hedgerows, to maintain the historical integrity of the area in the face of new developments.

3.3.4 Community Engagement

Engaging with the local community to understand the cultural and emotional significance of the heritage assets is crucial. The ES should include consultations with residents and heritage organisations to ensure that the proposed development does not diminish the value of Ashby cum Fenby's historical and cultural landscape.

3.4 Conclusion – Section 3.0

The cultural heritage and archaeology of Ashby cum Fenby are integral to its identity as a village with deep historical roots and a largely unspoiled rural character. The potential impact of 400kV overhead transmission lines on both designated and non-designated heritage assets could be profound, altering the setting and context of these assets in ways that diminish their historical and cultural significance. The Parish Council urges a thorough and sensitive assessment of these impacts within the ES, with a strong emphasis on exploring mitigation strategies that preserve the cultural landscape and heritage of Ashby cum Fenby for future generations.

4.0 Community and Socio-Economic Impacts

4.1 Impact on Local Community

The ES must carefully consider the potential adverse effects that the proposed 400kV overhead transmission lines could have on the local community of Ashby cum Fenby. This village, known for its rural charm, tight-knit community, and tranquil environment, faces significant risks to its residential amenity and quality of life due to the proposed development.

4.1.1 Visual Intrusion

The visual impact of overhead transmission lines would be profound in Ashby cum Fenby, where the unspoiled rural landscape is a central aspect of the village's appeal. The towering pylons and overhead lines would be visible from many parts of the village, including from homes, public spaces, and popular walking routes. For a community that values its scenic surroundings, the introduction of industrial infrastructure could lead to a significant decrease in the overall quality of life.

Residents who have chosen to live in Ashby cum Fenby often do so for its aesthetic appeal, which is characterised by open vistas, green fields, and historical landscapes. The presence of overhead transmission lines would disrupt these views, leading to a sense of loss and frustration within the community. This visual intrusion could also affect local social gatherings, events, and outdoor activities that rely on the pleasant environment of the area.

4.1.2 Noise During Construction and Operation

The construction phase of the project is likely to involve significant noise, which could disrupt the peace and quiet that residents of Ashby cum Fenby currently enjoy. Construction activities, the movement of heavy machinery, and the installation of pylons could lead to an increase in noise levels, causing stress and disturbance to residents, particularly those living closest to the proposed line route.

Once operational, the transmission lines may generate a low-frequency hum, especially during wet weather conditions and fog. While often minimal, this noise can still be a source of irritation for residents, particularly in a quiet rural area where ambient noise levels are typically low. The long-term exposure to such noise could have cumulative effects on residents' well-being, contributing to stress and potentially leading to health issues over time.

4.1.3 Impact on Mental Health and Well-being

The mental health and well-being of residents is a critical concern, especially in a community like Ashby cum Fenby where many individuals have chosen to live due to the peaceful environment. The visual impact of the overhead lines, combined with noise and the perceived loss of environmental quality, could lead to increased anxiety, stress, and a sense of powerlessness among residents.

The ES should consider the psychological impact of the overhead lines on residents who may feel that the development is an imposition on their chosen way of life. This is particularly relevant for individuals who have moved to the area seeking a retreat from urban environments and who value the tranquillity and natural beauty of Ashby cum Fenby as essential to their mental well-being.

4.1.4 Community Identity and Cohesion

The proposed development could also affect the sense of community identity and cohesion in Ashby cum Fenby. The village's identity is closely tied to its rural setting and historical continuity, and the introduction of modern infrastructure could be seen as a threat to this identity. Residents may feel a sense of loss or disillusionment, which could affect community morale and participation in local activities.

4.2 Property Values

The impact of overhead transmission lines on property values in Ashby cum Fenby is a significant concern for the local community. The rural character of the area is a key factor in its desirability, and any perceived or actual reduction in the quality of the environment could lead to a decline in property values.

4.2.1 Rural Setting and Market Desirability

Ashby cum Fenby's appeal lies in its combination of rural charm, historical features, and peaceful environment. Potential buyers are often drawn to the area for these reasons, and the introduction of overhead lines could deter future purchasers who are seeking an unspoiled rural setting. The visual intrusion of pylons could make properties less attractive, leading to longer times on the market and possibly lower selling prices.

The ES should include a detailed analysis of how property values could be affected, taking into account the specific characteristics of Ashby cum Fenby's housing market. This analysis should consider the experiences of other rural areas where similar infrastructure has been introduced and provide a comparative assessment of the potential decline in property values.

4.2.2 Impact on Residential Sales

For current homeowners, the overhead lines could result in a significant financial loss if property values decline. This is particularly concerning for residents who have invested in the area with the expectation of long-term stability and appreciation in property values. The uncertainty and potential financial impact could cause stress and anxiety, particularly for those planning to sell their homes in the near future.

The ES should also consider the potential impact on property sales, as the presence of overhead lines could lead to a reduction in buyer interest and a subsequent decrease in market activity. This could have broader socio-economic implications for the village, as reduced property turnover can lead to stagnation in the local economy and a decrease in community renewal.

4.3 Health and Well-being

The potential health impacts associated with electromagnetic fields (EMFs) from overhead transmission lines are a critical issue for the residents of Ashby cum Fenby, particularly given the proximity of residential areas and public spaces to the proposed route.

4.3.1 Concerns Over EMFs

While scientific studies on the health impacts of EMFs have produced mixed results, there remains a level of public concern regarding the long-term exposure to EMFs from high-voltage transmission lines. Residents living close to the proposed route may experience anxiety over potential health risks, particularly for vulnerable groups such as children, the elderly, and those with pre-existing health conditions.

The ES should provide a comprehensive review of existing research on EMFs and health, specifically addressing the concerns of the local community. It should also include monitoring and modelling of EMF levels in residential areas, schools, and public spaces to assess the potential exposure and ensure that it falls within safe limits as established by relevant health guidelines.

4.3.2 Long-term Mental Health Impacts

Beyond the physical health risks, the perceived threat of EMFs can contribute to long-term mental health issues, including stress, anxiety, and sleep disturbances. For residents of Ashby cum Fenby, who value their rural environment for its health benefits, the introduction of overhead lines could undermine their sense of security and well-being.

The ES should also consider the cumulative mental health impacts, combining the stress of visual intrusion, noise, potential property devaluation, and EMF concerns. The importance of addressing these issues through community support initiatives and clear communication strategies should be emphasised.

4.3.3 Impact on Public Spaces

The proposed overhead transmission lines may pass close to public spaces that are important for community well-being, such as woodlands, recreational fields, and walking paths. The presence of pylons near these areas could deter their use, reducing opportunities for outdoor activities that are crucial for physical and mental health.

The ES should assess how the development could impact the use of public spaces and propose mitigation strategies to ensure that residents continue to have access to safe, pleasant environments for recreation and social interaction.

4.4 Conclusion – Section 4.0

The community and socio-economic impacts of the proposed 400kV overhead transmission lines in Ashby cum Fenby are multifaceted and significant. The potential for visual intrusion, noise, health concerns, and property devaluation poses serious risks to the quality of life and

well-being of the local community. The Parish Council emphasises the need for a comprehensive assessment of these impacts within the ES, including detailed community consultations and socio-economic analyses, to fully understand and address the concerns of residents. Mitigation strategies should be developed to protect the unique character of Ashby cum Fenby and ensure the continued health and well-being of its community.

5.0 Alternative Options Analysis

5.1 Consideration of Alternatives

The ES must thoroughly investigate and evaluate alternative options for the proposed 400kV transmission lines to minimise the environmental and social impacts on Ashby cum Fenby and the surrounding areas. Given the rural, historical, and ecological sensitivity of this region, it is essential that all feasible alternatives are explored to protect the local environment, cultural heritage, and community well-being.

5.1.1 Undergrounding Cables

Environmental and Aesthetic Benefits: Undergrounding transmission lines presents a significant opportunity to preserve the visual and environmental integrity of Ashby cum Fenby. Unlike overhead lines, underground cables would not disrupt the unspoiled rural vistas or the setting of heritage assets such as St. Peter's Church. This approach would maintain the historical continuity of the landscape, ensuring that the village's character remains intact for future generations.

Reduced Impact on Wildlife: Underground cables would also mitigate many of the ecological risks associated with overhead lines, such as collision hazards for birds and habitat fragmentation. By avoiding the construction of tall pylons, undergrounding could preserve important wildlife corridors, particularly the hedgerows and small woodlands that are crucial for local species like bats, barn owls, and other protected wildlife. This option would significantly reduce the likelihood of disrupting the movement and foraging patterns of these species.

Minimising Community Disruption: For the local community, underground cables would minimise the visual intrusion and noise that typically accompany overhead lines. This would help preserve the quality of life in Ashby cum Fenby, where residents place a high value on their peaceful and aesthetically pleasing environment. Additionally, the potential impacts on property values and mental well-being would be greatly reduced if the infrastructure were hidden underground.

5.1.2 Collaboration with Other Projects (e.g., Viking CCS)

Integrated Infrastructure Planning: The ES should consider opportunities for collaboration with other infrastructure projects, such as the Viking CCS (Carbon Capture and Storage) project. By aligning the routing and planning of the transmission lines with these projects, it may be

possible to share corridors, reduce redundant infrastructure, and limit cumulative environmental impacts.

Synergies in Sustainability: Collaborative planning could also support broader environmental sustainability goals. For example, if the Viking CCS project requires new pipelines or infrastructure that could be co-located with the transmission lines, this could reduce the overall land use impact and potentially lower costs for both projects. Such synergies could enhance the environmental stewardship of both initiatives, leading to a more sustainable outcome for the region.

5.2 Technical and Economic Viability

The ES must provide a transparent and detailed analysis of the technical and economic viability of these alternative options, particularly focusing on the long-term benefits and costs associated with undergrounding transmission lines.

5.2.1 Technical Considerations

Feasibility of Undergrounding: The ES should evaluate the specific technical challenges associated with undergrounding in the context of Ashby cum Fenby's geology, hydrology, and land use patterns. For instance, the area's soil composition, water table levels, and proximity to sensitive archaeological sites must be assessed to determine the feasibility of underground cables. The potential for disruption during the installation phase and the need for ongoing maintenance access should also be addressed.

Technological Advances: Advances in technology have made undergrounding more feasible and cost-effective in certain contexts. The ES should explore whether modern technological systems could be utilised to enhance the efficiency and reliability of underground cables while minimising environmental impacts that might be intensified with overhead lines.

5.2.2 Economic Considerations

Cost-Benefit Analysis: While undergrounding typically involves higher initial costs compared to overhead lines, the ES should provide a comprehensive cost-benefit analysis that considers the long-term economic impacts. This analysis should account for the potential savings in environmental mitigation, the preservation of property values, and the avoidance of social and community disruption.

Long-term Environmental and Economic Benefits: The long-term economic benefits of undergrounding should not be underestimated. These may include the continued attractiveness of Ashby cum Fenby as a place to live, which would help maintain property values and support the local economy. Additionally, by avoiding the visual and ecological impacts of overhead lines, undergrounding could enhance the area's appeal to tourists, particularly those interested in its historical and natural assets.

Sustainability and Future-Proofing: Investing in undergrounding also supports environmental sustainability by reducing the need for future mitigation and ensuring that the infrastructure is resilient to changing environmental conditions. The ES should consider how undergrounding

could contribute to future-proofing the region's infrastructure against the impacts of climate change, such as more frequent and severe weather events that could affect the reliability of overhead lines.

5.3 Alternative Methods to Support Environmental Sustainability

Reducing Carbon Footprint: The ES should explore how the choice of transmission line methods could support the broader goal of reducing the carbon footprint of infrastructure projects. For instance, underground cables, while energy-intensive to install, might offer lower operational emissions and reduced environmental degradation over time.

Biodiversity Offsetting: If undergrounding or other alternatives are not fully feasible, the ES should consider implementing biodiversity offsetting measures to compensate for any unavoidable impacts. This could involve creating new habitats, enhancing existing ones, or funding conservation projects in the region to ensure that the overall ecological health of the area is maintained.

5.4 Conclusion – Section 5.0

The Alternative Options Analysis within the ES is critical for ensuring that the proposed 400kV transmission lines are designed and implemented in a way that minimises environmental, social, and economic impacts on Ashby cum Fenby. The Parish Council strongly advocates for a rigorous exploration of undergrounding cables, leveraging collaboration with other projects to reduce the overall environmental footprint. By carefully weighing the technical and economic viability of these alternatives, the ES can support a solution that protects the unique character, heritage, and ecology of Ashby cum Fenby, while also aligning with broader sustainability goals for the future.

6.0 Cumulative and In-Combination Effects

6.1 Comprehensive Analysis

The ES must conduct a thorough and detailed assessment of the cumulative effects that the proposed 400kV overhead transmission lines will have in combination with other existing and planned projects in the region, such as the Viking CCS (Carbon Capture and Storage) project. Ashby cum Fenby and its surrounding areas are characterised by a unique blend of rural tranquillity, historical continuity, and ecological richness. It is crucial to consider how the introduction of multiple large-scale infrastructure projects could collectively impact the landscape, ecology, and community life in this sensitive area.

6.1.1 Cumulative Visual Impact

Existing and Planned Infrastructure: The visual landscape of Ashby cum Fenby is largely unspoiled, with open fields, hedgerows, and traditional buildings dominating the scenery. However, the introduction of overhead transmission lines, when combined with other infrastructure projects such as the Viking CCS, could lead to significant cumulative visual

impacts. The skyline, currently free from large industrial structures, could become increasingly cluttered, leading to a gradual industrialisation of the rural landscape.

Key Viewpoints at Risk: Specific areas, such as the views from Barton Street, Willow Lakes, and the Landmark Café Restaurant, which offer sweeping vistas across the countryside and towards the Humber estuary, are particularly sensitive to cumulative visual impacts. The ES must assess how the combined presence of overhead lines, CCS infrastructure, and any other planned developments could degrade these views, making the landscape appear more fragmented and less natural.

Impact on Rural Character: The rural character of Ashby cum Fenby, which is central to its identity and appeal, could be eroded by the cumulative visual effects of multiple projects. The ES should consider how the incremental addition of industrial infrastructure might alter the perception of the area from a peaceful, historically-rich village to a corridor for energy infrastructure. This shift could diminish the area's attractiveness to residents and visitors alike.

6.1.2 Cumulative Ecological Impact

Habitat Fragmentation: The combined impact of multiple infrastructure projects could exacerbate habitat fragmentation in and around Ashby cum Fenby. The area's hedgerows, woodlands, and watercourses form critical wildlife corridors that support a diverse range of species, including protected birds, bats, and other fauna. The introduction of overhead lines, in combination with infrastructure required for projects like the Viking CCS, could disrupt these corridors, isolating habitats and reducing biodiversity.

Species at Risk: The cumulative ecological impact could be particularly severe for species that rely on large, connected habitats. For example, barn owls and kestrels, which are already at risk from collision with overhead lines, could face additional threats if other projects further fragment their hunting grounds. Bats, which depend on continuous hedgerow networks for foraging and navigation, could also suffer from the combined effects of habitat disruption and increased EMF exposure from multiple sources.

Increased Pressure on Local Ecosystems: The local ecosystems in Ashby cum Fenby are finely balanced and could be tipped into decline by the cumulative pressures of multiple developments. The ES should evaluate how these pressures might lead to a reduction in species populations, changes in habitat quality, and the potential for local extinctions, particularly for sensitive species like great crested newts and badgers.

6.1.3 Cumulative Community Impact

Impact on Quality of Life: The cumulative impact on the community's quality of life must be a central consideration in the ES. Residents of Ashby cum Fenby could face a compounding of negative effects, including increased noise, visual intrusion, and traffic disruptions, as a result of multiple overlapping projects. This could lead to heightened stress, reduced mental well-being, and a decline in community cohesion as the rural peace that residents value is steadily eroded.

Economic Impacts: The combined effect of multiple infrastructure projects could also impact the local economy, particularly if property values decline and tourism diminishes due to the industrialisation of the landscape. The ES should analyse how these economic impacts could affect local businesses, property owners, and the overall economic vitality of the village.

6.2 Strategic Approach

Given the potential for significant cumulative impacts, the ES must adopt a strategic approach to understanding how the proposed development fits within the broader energy infrastructure in the region and its combined effects on the environment, ecology, and communities.

6.2.1 Integration with Regional Planning

Alignment with Regional Infrastructure Plans: The ES should consider how the 400kV transmission lines align with broader regional infrastructure plans, including the Viking CCS project and any other energy developments. This includes assessing whether the cumulative impacts could be mitigated through integrated planning efforts, such as the co-location of infrastructure or the development of shared corridors to minimise land use and environmental disruption.

Strategic Environmental Assessments: The ES should be informed by Strategic Environmental Assessments (SEA) that have been conducted for the region. These assessments provide a framework for evaluating cumulative impacts and can help identify areas where the combined effects of multiple projects might exceed acceptable thresholds for environmental or community impacts. The ES should use this information to guide decision-making on route selection, mitigation strategies, and alternative options.

6.2.2 Long-Term Sustainability Considerations

Sustainability and Resilience: The ES should take into account the long-term sustainability and resilience of the region's infrastructure. This involves considering how the cumulative effects of multiple projects might affect the region's ability to adapt to future challenges, such as climate change, population growth, and shifts in land use patterns. The strategic approach should prioritise solutions that enhance the region's resilience, such as undergrounding cables to protect them from extreme weather or integrating green infrastructure to offset environmental impacts.

Balancing Energy Needs with Environmental Protection: The strategic approach should also seek to balance the region's energy infrastructure needs with the imperative to protect and preserve the environment and communities of Ashby cum Fenby and the surrounding areas. This might involve trade-offs, such as choosing less visually intrusive technologies, routing infrastructure through less sensitive areas, or using more advanced structures, even if these options are more expensive or technically challenging.

6.2.3 Mitigation and Offsetting Measures

Coordinated Mitigation Efforts: The ES should explore opportunities for coordinated mitigation efforts that address the cumulative impacts of multiple projects. This could include joint habitat

restoration projects, shared environmental monitoring programs, or coordinated community engagement initiatives to address concerns about cumulative impacts.

Biodiversity Offsetting: Where cumulative ecological impacts are unavoidable, the ES should consider biodiversity offsetting measures that ensure no net loss of biodiversity across the region. This could involve creating new habitats, enhancing existing ones, or funding conservation projects in other parts of the region to compensate for habitat loss and fragmentation in Ashby cum Fenby.

6.3 Conclusion – Section 6.0

The cumulative and in-combination effects of the proposed 400kV overhead transmission lines must be rigorously assessed within the ES to ensure that the development does not lead to unacceptable levels of environmental, ecological, and community degradation in Ashby cum Fenby. By adopting a strategic approach that integrates regional planning efforts and prioritises long-term sustainability, the ES can help mitigate these impacts and ensure that the development supports both the energy needs of the region and the preservation of its unique natural and cultural heritage. The Parish Council strongly advocates for this comprehensive and forward-thinking approach to safeguard the future of Ashby cum Fenby and its surrounding areas.

7.0 Considerations for Horses, Bridleways and Equestrian Activity

Ashby cum Fenby is well-known for its extensive network of bridleways and the popularity of equestrian activities in and around the village. The proposed installation of 400kV overhead transmission lines as part of the Grimsby to Walpole project could have significant impacts on both horses and their riders, as well as on the safety of pedestrians and vehicles in the area. Below are detailed considerations regarding these potential impacts.

7.1 Impact on Horses and Their Well-being

Visual and Auditory Sensitivity: Horses are highly sensitive animals, particularly to sudden movements, bright flashes, and loud noises. The presence of towering pylons and overhead cables could introduce visual elements that are unfamiliar and potentially frightening to horses. The height and scale of pylons, along with the presence of sagging wires that may move in the wind, could be perceived as threats by horses, leading to increased anxiety or spooking.

Construction activities associated with the installation of the transmission lines, including heavy machinery, loud noises, and ground vibrations, could also distress horses. This could result in behavioural changes, such as increased skittishness, reluctance to use certain bridleways, or in extreme cases, bolting, which could pose risks to both horses and riders.

Electromagnetic Fields (EMFs): There is ongoing research into the potential effects of EMFs on animals, including horses. Although the evidence is not yet conclusive, there is concern that prolonged exposure to EMFs from high-voltage transmission lines could affect the well-being of horses. Potential impacts might include changes in behaviour, increased stress

levels, or other health-related issues. The ES should include an assessment of these risks and consider any scientific studies related to the effects of EMFs on equines.

7.2 Safety of Riders, Pedestrians, and Vehicles

Risk of Accidents Due to Horse Spooking: Spooked horses can pose significant risks not only to their riders but also to pedestrians and vehicles in the vicinity. If a horse becomes startled by the overhead lines or the associated construction activities, it may bolt or behave unpredictably, potentially leading to accidents. This is particularly concerning in areas where bridleways intersect with roads or are close to pedestrian pathways.

The proximity of the bridleways to the proposed route of the overhead transmission lines should be carefully mapped out in the ES. Particular attention should be given to locations where bridleways cross or run parallel to roads, as these are potential hotspots for accidents.

7.3 Impact on Popular Bridleways

The bridleways in and around Ashby cum Fenby are widely used by the local community and attract riders from neighbouring areas and all over. The introduction of overhead lines could deter equestrians from using these routes due to concerns over safety and the well-being of their horses. This could reduce the accessibility and enjoyment of these bridleways, leading to a decrease in their use and potentially impacting the local equestrian culture and related businesses.

The ES should assess the impact on specific bridleways, including popular routes such as those running through local woodlands, open fields, and near the village itself. The potential for reduced use and the implications for local equestrian tourism and activities should be thoroughly examined.

7.4 Mitigation Measures for Safety

The Parish Council strongly recommends that the ES includes specific mitigation measures to address the safety concerns of horse riders. These could include:

Buffer Zones: Establishing sufficient buffer zones between the proposed transmission lines and bridleways to minimise the visual and auditory impact on horses.

Screening: The use of natural screening, such as trees or hedgerows, to obscure the view of pylons from bridleways, thereby reducing the potential for horses to become spooked.

Signage and Information: Providing clear signage and information along bridleways to alert riders to the presence of overhead lines and construction activities. This could help riders prepare their horses and navigate these areas more safely.

Alternative Routes: During the construction phase, consider providing alternative bridleway routes to ensure the safety and continued enjoyment of equestrian activities in the area.

7.5 Construction Traffic and Safety

The movement of construction vehicles along rural roads, many of which may be narrow and shared by horse riders, pedestrians, and local traffic, is another concern. Horses are often sensitive to large, noisy vehicles, and unexpected encounters with construction traffic could lead to dangerous situations.

The ES should include a projected traffic management plan that considers the needs of equestrians, ensuring that construction traffic is carefully managed, with appropriate speed limits and measures to reduce the risk of accidents. This might include scheduled road closures or the provision of alternative bridleway routes during peak construction times.

The proposed 400kV overhead transmission lines pose several potential risks to horses, riders, pedestrians, and vehicles in and around Ashby cum Fenby. The Parish Council emphasises the need for a thorough assessment of these risks within the Environmental Statement, with particular focus on the safety and well-being of the local equestrian community. We advocate for the implementation of robust mitigation measures to minimise the impact on bridleways and ensure that Ashby cum Fenby remains a safe and enjoyable area for horse riding and other outdoor activities.

8.0 Request for Diligent Use of the Quality of Life Capital (QoLC) Tool

Ashby cum Fenby Parish Council urges the Planning Inspectorate and National Grid to incorporate the Quality of Life Capital (QoLC) Tool as a critical component of the ES for the Grimsby to Walpole project. The QoLC Tool is intended to evaluate the broader impacts of development projects on the quality of life of local communities, taking into account both tangible and intangible factors that contribute to well-being.

Given the potential significant impacts of the proposed 400kV overhead transmission lines on the residents of Ashby cum Fenby and surrounding areas, it is essential that a thorough and diligent application of the QoLC Tool is undertaken. This approach will help ensure that all aspects of community well-being are fully assessed and that appropriate mitigation strategies are developed to address any negative impacts.

8.1 Comprehensive Assessment of Quality of Life Factors

The QoLC Tool should be used to assess how the proposed transmission lines will affect the social fabric of Ashby cum Fenby. This includes evaluating potential disruptions to community cohesion, the impact on local amenities, and the overall sense of place that residents associate with their village. The potential for visual intrusion, noise, and changes to the landscape should be carefully examined, as these factors can significantly influence the social well-being of the community.

The QoLC Tool should encompass an assessment of potential health impacts, including both physical and mental health. The stress and anxiety associated with the presence of large overhead lines, as well as concerns about EMFs, should be thoroughly investigated.

Additionally, the safety of residents, particularly in relation to the movement of horses and the use of bridleways, should be a key focus.

The economic impacts on the local community should be carefully analysed using the QoLC Tool. This includes assessing potential declines in property values, changes in the desirability of the area for tourism and equestrian activities, and the broader economic consequences for local businesses that rely on the rural character of the area.

8.2 Identification of Mitigation and Enhancement Measures

The QoLC Tool should help identify specific measures that can mitigate the negative impacts of the proposed development on the quality of life of local residents. These measures might include alternative transmission routes, underground cabling, enhanced landscaping and screening, and the provision of community benefits that directly address the concerns of residents.

In addition to mitigation, the use of the QoLC Tool should explore opportunities to enhance the quality of life in Ashby cum Fenby. This might involve investments in local infrastructure, support for community projects, or initiatives that enhance the natural environment and local amenities.

8.3 Engagement and Transparency

The Parish Council strongly advocates for the active involvement of the local community in the application of the QoLC Tool. This includes meaningful consultation with residents to gather their views and concerns, which should be fully integrated into the assessment process. The community's input is crucial for ensuring that the QoLC Tool accurately reflects the values and priorities of those most affected by the proposed development.

The results of the QoLC assessment should be made fully transparent to the public. This includes clear communication of how the tool was applied, the findings of the assessment, and the rationale behind any proposed mitigation or enhancement measures. Transparency is essential for building trust and ensuring that the community feels that their quality of life is being safeguarded.

The Parish Council of Ashby cum Fenby requests that the Quality of Life Capital Tool be diligently applied throughout the assessment process for the Grimsby to Walpole project. This tool is vital for ensuring that the full spectrum of impacts on community well-being is considered and that any adverse effects are appropriately mitigated. We believe that the careful use of the QoLC Tool will contribute to a more balanced and sensitive approach to the development, ultimately leading to outcomes that better reflect the needs and values of our community.

9.0 Conclusion

The Ashby cum Fenby Parish Council's Scoping Opinion outlines the significant potential risks associated with the proposed 400kV overhead transmission lines as part of the Grimsby to Walpole project. The Parish Council urges the Planning Inspectorate and National Grid to carefully consider the unique environmental, ecological, and cultural characteristics of Ashby cum Fenby and surrounding areas. The introduction of such large-scale infrastructure poses considerable threats to the parish's rural character, biodiversity, and community well-being.

The Parish Council advocates strongly for alternative solutions, such as underground cabling, to mitigate the visual and ecological impacts. Additionally, it calls for a thorough assessment of cumulative and in-combination effects, emphasising the need for a strategic approach that integrates regional planning efforts and prioritises long-term sustainability.

By addressing these concerns with the appropriate level of diligence and sensitivity, the Parish Council believes that the development can proceed in a manner that safeguards the unique attributes of Ashby cum Fenby, ensuring that the needs of both the community and the environment are met for future generations.

We look forward to continued engagement on this matter and request that our concerns be carefully considered.



TOWN AND COUNTRY PLANNING ACT 1990

TOWN AND COUNTRY PLANNING GENERAL DEVELOPMENT PROCEDURE ORDER

BBC APPLICATION NO: 24/01615/LPA

To: The Planning Inspectorate

Bedford Borough Council *Has No Comment to make* on the development as set out on your website for application reference no **EN020036**

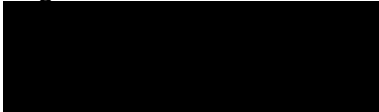
APPLICANT : The Planning Inspectorate

LOCATION : Pyewipe Farm Aylesby Road Grimsby North East Lincolnshire DN37 9NU

PARTICULARS OF DEVELOPMENT :

(This application is not being determined by Bedford Borough Council. Please contact the Applicant for details or to make comments) To view online go to <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN020036/documents> Regulations) - Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations 10 and 11 Application by National Grid Electricity Transmission plc (the Applicant) for an Order granting Development Consent for the Proposed Grimsby to Walpole Project (the Proposed Development)

Signed:



C Austin Director of Environment

From: bickerpc@gmail.com
To: [Grimsby to Walpole](#)
Subject: RE: EN020036 - Grimsby to Walpole Project - EIA Scoping and Consultation & Regulation 11 Notification
Date: 27 August 2024 12:27:34
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

You don't often get email from bickerpc@gmail.com. [Learn why this is important](#)

Dear Hannah

The Councillors at Bicker Parish Council have considered the documentation provided and do not have any comments to make.

Regards

Alison Delaney

Clerk and Responsible Financial Officer, Bicker Parish Council

Email: bickerpc@gmail.com

Correspondence address: 6 Beach Lane, Gosberton Rise, Spalding,
Lincolnshire PE11 4FJ

Tel: 07464 664775

[Homepage – Bicker Parish Council \(lincolnshire.gov.uk\)](http://lincolnshire.gov.uk)

From: Grimsby to Walpole <grimsbytowalpole@planninginspectorate.gov.uk>
Sent: Tuesday, August 6, 2024 1:39 PM
Subject: EN020036 - Grimsby to Walpole Project – EIA Scoping and Consultation & Regulation 11 Notification

Dear Sir/Madam

Please see attached correspondence on the proposed Grimsby to Walpole Project.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **2 September 2024**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Hannah Terry

Please note my working days are Monday to Thursday. I do not work on Fridays.

Mrs Kerry Culley
Bilsby & Farlesthorne P.C. Clerk
56 Bridgeways
Alford
Lincs
LN13 6FA

The Planning Inspectorate
Environmental Services

By email: grimsbytowalpole@planninginspectorate.gov.uk

30 August 2024

Dear Sir or Madam

Re: Application by National Grid Electricity Transmission plc (the Applicant) for an Order granting Development Consent for the Proposed Grimsby to Walpole Project

I am writing on behalf of Bilsby & Farlesthorne Parish Council with regard to the above matter.

The switching and converter stations which is proposed to be built at Asserby in the Bilsby Parish area, will have a direct and negative impact upon our parish and parishioners.

The people in our parish have grave concerns about the industrialisation of the countryside by both the pylons and switching and converter buildings which are proposed. The footprint of these buildings is estimated to be 100,000 sq. metres for the switching station and 20,000 sq. metres for the converter station. Both buildings are proposed to be up to 30m tall, The area these are planned for, is flat and the vistas both to the coast and inland to the Wolds area, an Area of Outstanding Natural Beauty (AONB) would be severely blighted, and have a detrimental effect on the area's two main forms of income and employment, namely the farming sector, which generates £1.3billion across the county and the tourism industry is worth £824m.

The Parish Council firmly believes the country's No.1 priority should be food production. That seems to have been sacrificed on the altar of biodiversity. The amount of top quality land being lost to food production would have a detrimental effect on Britain striving to become more self-sufficient in feeding itself. It would increase the amount of food needed to be imported and inevitably increase the field to fork mileage and increase our nation's carbon output when we should be doing everything to reduce this to achieve the governments net zero goal.

Bilsby & Farlesthorne Parish Council would therefore like to see included with any application, compliance with regulation 5(2) of the EIA Regulations as set out below:

(2) The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors—

(a) population and human health;

(b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC(14) and Directive 2009/147/EC(15);

(c) land, soil, water, air and climate;

(d) material assets, cultural heritage and the landscape;

(e) the interaction between the factors referred to in sub-paragraphs (a) to (d).

(3) The effects referred to in paragraph (2) on the factors set out in that paragraph must include the operational effects of the proposed development, where the proposed development will have operational effects.

(4) The significant effects to be identified, described and assessed under paragraph (2) include, where relevant, the expected significant effects arising from the vulnerability of the proposed development to major accidents or disasters that are relevant to that development.

(5) The Secretary of State or relevant authority, as the case may be, must ensure that they have, or have access as necessary to, sufficient expertise to examine the environmental statement or updated environmental statement, as appropriate.

In addition, details should be included which specifically identify and include:

1. Impact on the loss of agricultural land currently important in helping the UK in its food security measures.
2. Comprehensive study and report on the impact such development will have on the tourist industry. In particular, the erection of the interconnector and substations along the main route to the coast and the visual impact from the Wolds Area of Outstanding Natural Beauty.
3. A survey of all local roads and impact thereon in terms of construction traffic both within the parishes affected and along the major routes to be used to access the site(s)
4. A comprehensive and extensive bat survey for the proposed route and the proposed interconnector sites.
5. A comprehensive wildlife habitat and species survey for the proposed route and the interconnector sites and up to 10 metres outside the range of the application site(s), together with mitigation measures to protect all wildlife species in the area including flora and fauna.
6. Impact Assessment on existing underground infrastructure.
7. The cost of repairing the damage caused by heavy vehicles during the construction stages to the road infrastructure, which will probably last years.
8. Calculations for compensation payable to local people whose properties would be blighted or the businesses who would see a substantial drop in their ability to maintain a viable income.
9. The disruption which will undoubtedly be caused to local residences including, disruption to daily activities, light and dust pollution,
10. Impact on local medical and mental health and access to emergency services.
11. Impact on existing infrastructure including damage/pollution to water courses, broad band and telephone disruption due to pylons.

The parish council and the majority of people in our parish would prefer the cabling to continue under the sea and come onshore further south, (in line with National Grid “Beyond 2030 Report). This would negate the need to build the switching and converter stations.

We would urge decision makers to consider all the relevant points and come to the conclusion that the alternative option to build an offshore integrated grid would completely remove the need to destroy prestige countryside by taking the cabling further south where the power is required.

Bilsby & Farlesthorne Parish Council

Yours Faithfully

Kerry Culley
Parish Clerk
Bilsby & Farlesthorne PC



B O S T O N

BOROUGH COUNCIL

Municipal Buildings, West Street, Boston, Lincolnshire, PE21 8QR

Application No: B/24/0316
Case Officer: Sam Dewar Consultant
Planning Officer

E-mail: planning@boston.gov.uk
Tel: 01205 314305

30th August 2024

The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Sent via email to: grimsbytowalpole@planninginspectorate.gov.uk

Statutory Scoping Consultation to Boston Borough Council under Section 42 of the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (10 and 11) prior to the submission of an application for the application for an Order granting Development Consent For the proposed Grimsby to Walpole Project

Thank you for your recent consultation in relation to the above. Sam Dewar of Dewar Planning Associates has been instructed to act as lead officer on behalf of the three Local Planning Authorities consulted (Boston Borough Council, South Holland District Council and East Lindsey District Council).

An individual response will be provided on behalf of each Local Planning Authority (LPA) detailing how the development within their authority boundary impacts them.

Introduction

By way of an introduction, I am a chartered member of the RTPI and act as Director and founder of Dewar Planning. I have previously worked as planning officer through to head of planning at local planning authorities and have since formed my own private planning practice submitting applications to over 100 local planning authorities across the UK. These applications have ranged from large wind farms to residential schemes, and various small to major scale commercial developments. We also continue to provide bespoke consultancy assistance for local planning authorities due to the positive relationships we have developed.



www.boston.gov.uk
www.visitbostonuk.com

Like us on Facebook:
Boston Borough Council

Follow us on Twitter:
[@bostonboro](https://twitter.com/bostonboro)

The Applicant 'National Grid Electricity Transmission plc' intends to submit an application for Development Consent Order under Section 37 of the Planning Act 2008, comprising details of the proposed Grimsby to Walpole Project with an Environmental Statement in line with Regulation 14 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 as well as the other relevant policies and legislations.

Boston Borough Council (the LPA) are a statutory consultee as part of duty to consult (section 42 of the Planning Act 2008). For an inclusive and robust response, an internal consultation process has also been undertaken seeking internal responses from certain officers, parish councils and Councillors. All consultees have the ability to respond direct to the Applicant as part of this process however we have presented any responses received to date. Responses received after the submission deadline of 2nd September 2024 will be collated and sent on to the Applicant directly where it is hoped that will still be taken into account ahead of any formal submission.

List of Consultees

Each LPA are a consultee as part of duty to consult (section 42 of the Planning Act 2008). Responses were sought internally from department officers and Councillors and externally to Parish Councils and Town Councils. In some cases, consultations were received outside of these bodies and are included for completeness. All consultees have the ability to respond directly to the applicant as part of this process however we have presented any responses received. The list below is the list of consultations sought by the council. Later in this report if any other representations were received, they will also be included however will be shown as being external to demonstrate that these are not necessarily the views of the Council:

1. Environmental Health
2. Business Rates Officer
3. Heritage Lincolnshire
4. Arboricultural Officer
5. Forward Plans Officer
6. JRC Windfarm Coordinations
7. Algarkirk Parish Council
8. Butterwick Parish Council
9. Fishtoft Parish Council
10. Fosdyke Parish Council
11. Frampton Parish Council
12. Freiston Parish Council

13. Kirton Parish Council
14. Leverton Parish Council
15. Old Leake Parish Council
16. Sutterton Parish Council
17. Wrangle Parish Council
18. Wyberton Parish
19. Councillor R Austin
20. Councillor Chris Mountain
21. Councillor Peter Bedford
22. Councillor Dale Broughton
23. Councillor David Scoot
24. Councillor Sarah Sharpe
25. Councillor Helen Staples
26. Councillor David Middleton
27. Councillor Ralph Pryke
28. Councillor Claire Rylott
29. Councillor David Brown
30. Councillor James Cantwell
31. Councillor John Baxter
32. Councillor Callum Butler
33. Councillor Alison Austin

Proposed Development within Boston BC

Within Boston Borough Council, section 4, 5 and 6 of the Scoping Boundary are relevant as detailed below in Figure 1.1, It remains to be detailed what the exact works within sections 4, 5 and 6 will be, however at this stage it has been assumed that the predominant works is cable routing via above ground power lines, suspended between pylons.

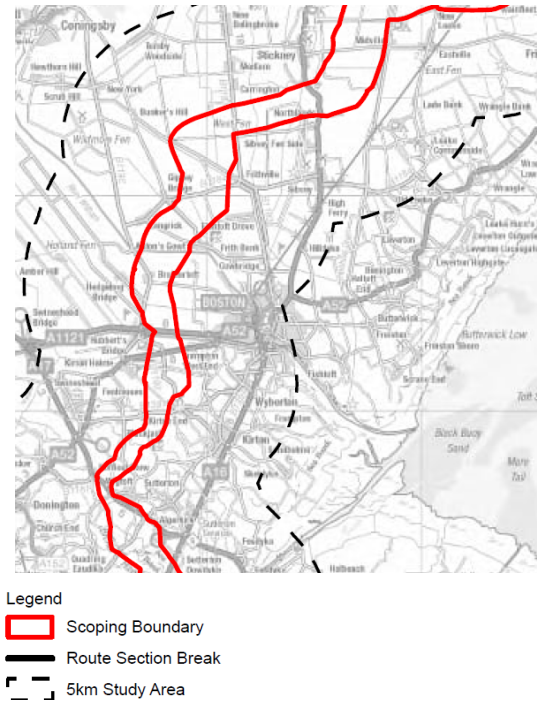
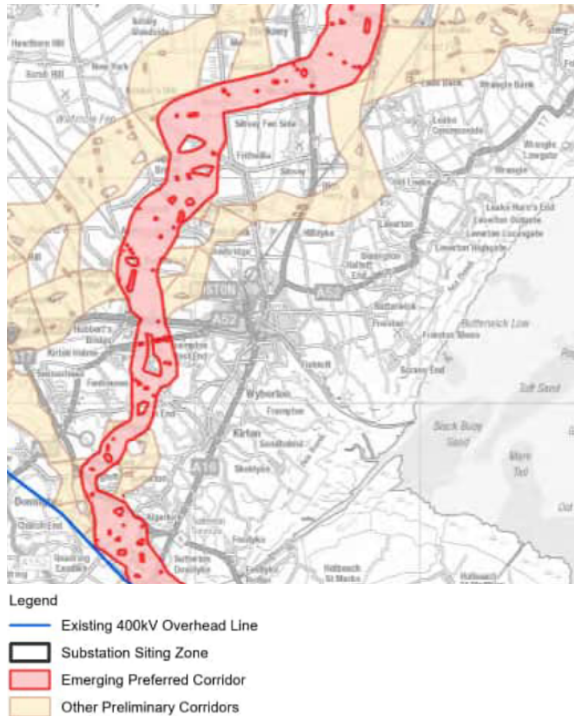


Figure 1.1 : Extracts from Figure 3.9 (left) and Figure 6.1 (right) showing the overall scoping area within Boston Borough from EN020036-000017-GWPL - Scoping Report Volume 3 Figures Part A - Figures 1.1 to 8.4

Planning Policy

Whilst the applicant will seek permission for the proposals directly from the SOC for a DCO under section 37 of the Planning Act 2008, there are still a number of local and national planning policies which are considered relevant and should be taken account of as part of the development process. These plans and local knowledge have been formed over several years and have come from a significant evidence base.

The South East Lincolnshire Local Plan 2011-2036 (SELLP) was jointly adopted by Boston Borough and South Holland District Council on the 8 March 2019. The relevant policies within the South East Lincolnshire Local Plan 2011-2036 are:

- Policy 2 ‘Development Management’ – requires proposals to demonstrate sustainable development considerations have been met through a number of criteria.
- Policy 3 ‘Design of New Development’ – requires development to create distinctive places through the use of high quality and inclusive design, demonstrating compliance with a number of considerations.
- Policy 4 ‘Approach to Flood Risk’ – developments must satisfy the sequential test and be supported by a site-specific flood risk assessment covering risk from all sources of flooding

including the impacts of climate change. It must be demonstrated that surface water from the development can be managed and will not increase the risk of flooding to third parties.

- Policy 28 'The Natural Environment' – Requires the protection, enhancement and management of natural assets, by ensuring all development proposals provide an overall net gain in biodiversity.
- Policy 29 'The Historic Environment' - Distinctive elements of the South East Lincolnshire historic environment will be conserved and, where appropriate, enhanced.
- Policy 30 'Pollution' Development proposals will not be permitted where, taking account of any proposed mitigation measures they would lead to unacceptable adverse impacts upon:
 - health and safety of the public;
 - the amenities of the area; or
 - the natural, historic and built environment;
 - by way of:
 - air quality, including fumes and odour;
 - noise including vibration;
 - light levels;
 - land quality and condition; or
 - surface and groundwater quality.
 - Planning applications, except for development within the curtilage of a dwellinghouse as specified within Schedule 2, Part 1 of The Town and Country Planning (General Permitted Development) (England) Order 2015, or successor statutory instrument, must include an assessment of:
 - impact on the proposed development from poor air quality from identified sources;
 - impact on air quality from the proposed development; and
 - impact on amenity from existing uses.
- Policy 31 'Climate Change and Renewable and Low Carbon Energy' - All development proposals will be required to demonstrate that the consequences of current climate change has been addressed, minimised and mitigated.
- Policy 32 'Community, Health and Wellbeing' - Development shall contribute to the creation of socially-cohesive and inclusive communities; reducing health inequalities; and improving the community's health and well-being.
- Policy 33 'Delivering a More Sustainable Transport Network' – reinforces the national approach to promoting sustainable alternatives to the car through new development, making the best use of, and seek improvements to, existing transport infrastructure and services. Solutions that are based on better promotion and management of the existing network and the provision of sustainable forms of travel are supported. To achieve this, a Transport Assessment and associated Travel Plan will be submitted with proposals.

The NPPF does not contain specific policies for NSIPs (for which particular considerations apply, determined in accordance with the decision-making framework set out in the Planning Act 2008 and relevant NPSs) but may be considered as a relevant consideration as below.

- Paragraph 123 - Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land⁴⁹.

Footnote 49 of the NPPF states:

Except where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity.

- Paragraph 124 - Planning policies and decisions should:
 - encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;
 - recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;
 - give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
 - promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and
 - support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.
- Paragraph 157 - The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

- Paragraph 165 - Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- Paragraph 180 - Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - o protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - o recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - o maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - o minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
 - o preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and;
 - o remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Representations Received

The LPA does not have in house specialists or advisers for all topic areas relevant to this response, therefore the below list of representations sets out the comments and advice received from internal consultees as well as external consultants employed by the Council. Where no comments have been received and no external consultant employed, this response will seek to comment generally on the topic areas where appropriate, however it is acknowledged that comments may be sent directly by the County Council and these will be endorsed by the Council.

As the Council do not have a Landscape Officer, an external company was sought to respond on behalf of the Council. Terra Loci are Landscape Architects and specialise in Landscape Planning.

The comments received from consultees are summarised as follows, and as stated they are divided into internal and external. If any external responses are received that officers believe are relevant to certain chapters of the scoping report then these will be elaborated upon within the review section of the response:

Internal

Environmental Health

No objections

Landscape (summarised and expanded upon later in this response)

- Representative viewpoints must be submitted and approved prior to the assessment being undertaken
- ZTV analysis should also include a bare-earth scenario to show the potential worst-case
- It is unclear from the Landscape / Visual methodologies how results of ZTV analysis will be presented
- ZTV analysis should also be undertaken for the maximum foreseeable parameters of development within substation compounds
- Locations for representative viewpoints should be submitted for approval along with the type of visualisation proposed and appropriate justification for the visualisation type
- The LVIA should consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics. The EIA process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit
- Cumulative schemes to be included within cumulative assessment should be submitted prior to undertaking assessment.

Planning Policy

Given your deadlines the only helpful, and obvious comment, is to ask why the two schemes cannot share infrastructure.

I realise one is DC and the other AC and that the Grimsby to Walpole 'New Walpole Substation Location Options report' shows underground DC is very much more expensive than the overhead AC line option. However, in general terms from the point that the EG3 & 4 schemes come on shore they have a similar route to Weston and then the Walpole. I also know that another offshore scheme is likely to come to Lincolnshire from the north. I appreciate these various projects may not be on the same time frame, nonetheless from an environmental and amenity angle NGED need to

explain in clear terms why the schemes cannot be more joined up and allow more undergrounding of the overhead line.

Councillor Cantwell

This application will have long lasting and damage impacts on Lincolnshire and Boston Borough. It

will impact tourists who come to see our beautiful landscapes, impact agricultural land and neighbour amenities. Lincolnshire will see little benefit from this application and while other countries are investing in offshore grids it seems National Grid are not modernising with the times. We are a prime brassica growing area and this needs to be preserved at all costs. My residents in the Five Villages are firmly against this project and it is quite frankly ridiculous that my ward is being treated as a dumping ground for energy projects that do not benefit us as much as we need.

Councillor Evans

As Ward Councillor for Swineshead & Holland Fen Ward, Boston, it is my role, if not duty, to represent my residents' views and feelings on local issues. This planning application B/24/0316 is by far the biggest issue that I have been contacted about by residents in my 15 months since being elected. I fully support Lincolnshire County Council's executive commissioning an independent report into the impacts of National Grid's proposal to erect 420 pylons, around 50m high, through the Lincolnshire countryside. The majority of my residents have also agreed that the option of an "undersea" cable, albeit more costly, is by far the preferred choice of project. The LCC executive agreed to put in a formal objection to the scheme that would see 140km of high voltage electricity cables, pylons and substations run through the county from Grimsby to Walpole in Norfolk. An independent analysis is also being commissioned to look at the impacts the pylons could have on Lincolnshire including putting farmland out of use, the visual impact on the flat landscape, the effect on tourism and air traffic limitations. This Planning Application runs through 3 wards of the BBC. The Town Centre wards are not affected, it is the Rural ones of Kirton & Frampton, Swineshead & Holland Fen and Five Villages. The Planning Committee is made up of mostly Town Centre Councillors. This fact should not be ignored.

Councillor Rylott

Representing residents in Kirton and Frampton Ward whom have come forward to me with regards to concerns over the proposed application. National Grids proposal to erect 420 pylons, around 50m high, throughout the Lincolnshire countryside to serve other parts of the country with electricity is raising many concerns within our rural community. The scheme would see 140km of high voltage electricity cables, pylons and substations running through the county from Grimsby to Walpole in Norfolk. As I said this would be to serve other counties NOT Lincolnshire and Norfolk. These pylons will have a massive impact on the visual impact of the flat landscape, putting farmland out of use, it will have an impact on tourism and air traffic limitations. It will also down value residential properties.

Councillor Middleton

It will be a sad day that this scheme is signed off by the Secretary of State as in its present form it will leave a sad looking Lincolnshire skyline. If it were to be made underground then at least the scaring would have been eliminated.

I have not inspected the application minutely but have interacted with local residents to find out their feelings. You will not be surprised that they are totally against it as they are to be left with the aftermath whilst getting none of the benefits.

I personally am sure the scheme will be signed off to prevent blackouts although they may still happen in a time of cloud and low wind speeds. Or speeds that are too great.

External

Old Leake Parish Council

Old Leake Parish Council do not support the overground aspect of this application and state alternative ways must be sought as to not wreck the landscape of Lincolnshire as this will do harm to the visual aspect of this development and the health and well-being of residents in the area.

It is unfortunate or deliberate? that this application is to be considered during August when many Parish Council's do not meet.

Wrangle Parish Council

Here are some comments from Wrangle Parish Council regarding the above planning application:

"Wrangle Parish Council is not in favour of EGL3 and 4 in the proposed format. From what it understands, given there are lots of documents to read (and not just NG's spin), these projects result in the pylons coming through Lincolnshire from the Anderby Creek/Mablethorpe area, through much of our neighbouring villages and into Norfolk ending up at Walpole.

Whilst not being against renewable energy there are ways of doing it nationally without Lincolnshire having to pay the price. We are not a wealthy county and rely heavily on income from farming and tourism for coastal resorts or nature. These will be badly affected by the development of the pylons, huge sub-stations and converters that need to be built. We believe compensation is available for landowners but it only covers the duration of the build work and not the long-term effect of losing farm land, losing visitors etc. The tourism industry is fragile as it is and still recovering from the impact of covid and lockdowns. Food security is just as important as energy security. There's no point making our own energy if we are having to import our own food at great expense (including energy costs).

House prices are already dropping in the areas that may be near pylons so it doesn't only affect landowners, it will affect the wider communities. It is not known if there are any physical health effects from living near a pylon as it depends who you read/listen to, there will certainly be mental health cost from fear, stress, loss of view, noise etc.

Whilst this doesn't directly affect us in Wrangle, it affects our neighbours so affects us indirectly. We will suffer the impact of the heavy and oversized vehicles transporting building materials on a regular basis for several years. We routinely complain at council meetings about the state of the roads and potholes not being repaired, roads sinking or collapsing into dykes. Some of this is caused by the heavier modern farm vehicles and trailers - if our roads aren't capable of coping with this necessary traffic then how will they cope with the additional (and possibly heavier and slower) NG traffic?

The short term effect of lower bills by doing some of this project overground and not fully by sea seems pretty pointless when it has a much longer term economic effect on national food security and local industries of tourism/farming. Wrangle Parish Council would rather see EGL3 and 4 going straight to Walpole without coming into our area thus minimising/reducing any need to come on land until the last possible moment. Whilst we are not against renewable energy as we need it as an alternative to oil/gas imports, it just needs to be better thought out.

Freiston Parish Council

Freiston Parish Council do not have any objections to this planning.

Sutterton Parish Council

Sutterton Parish Council would like to follow the same line of objections the County Council has. Negative impacts from this project on tourism and destruction of invaluable agricultural land, not to mention the cumulative impact of energy project locally for Sutterton. We are known as the big skylines county, something unique to the Fens, losing this would make our area less attractive for folks looking to move in.

Algarkirk Parish Council

Algarkirk PC do not have any comment regarding the content of scoping application however, they strongly object to the application as they are concerned for food security and the impact on the landscape. They would favour alternatives such as offshore cable or underground lines.

Benington Parish Council

This has been discussed with Benington Parish Council and would like to submit the following comment:

- We wish to object based on The visual impact for the countryside and local residents is devastating.
- There are better options, like going underground

JRC Windfarm, Coordinations

If you need us to investigate further, then please use the link at the end of this response or login to your account for access to your co-ordination requests and responses.

Thank you for the invitation to comment on this OHL development. We have reviewed the documentation provided, and cannot locate the data we require for our analysis.

Please provide the NGR (easting, northing) and intended pole type (and height) for each intended pole / pylon so that we can proceed with our analysis. Failure to do so (in good time to conduct appropriate analysis) before the due date of 27th August 2024 will result in an automatic objection from JRC.

Heritage Lincolnshire

A detailed and thorough assessment of significance and heritage impact assessment will be required to accompany any future application to identify built heritage assets, designed landscape or archaeological features along the entire course of the proposed development.

Once identified the assets significance must be described and assessed and then the impact of the proposals would need to be assessed for the impact on significance as required under the Local Plan and NPPF.

Witham Fourth District Internal Drainage Board

Witham Fourth District IDB and its officers are aware of the above project and have had some initial conversations with Carl Simms of National Grid but, are yet to sit down and discuss specific details regarding the proposed route and IDB asset interfaces.

The current route of the proposed National Infrastructure project has a significant impact on the Board's maintained watercourse and operations. At this early stage we do not have a definitive route and design so our comments will be generalised to cover the expected implication. We expect to see the Land Drainage Act disestablished, but the necessary provisions will be catered for in a Protected Provisions in the DCO, which will be agreed with the Board, and we look forward to conversations with National Grid to minimise the impact on the Board and its operations.

1. There are several Board maintained watercourses that exist within the boundary of the proposed works and to which BYELAWS and the LAND DRAINAGE ACT applies:

No person may erect any building or structure (including walls and fences), whether temporary or permanent, or plant any tree, shrub, willow, or other similar growth within 9 metres of the top edge of the watercourse/edge of the culvert without the prior consent of the Board.

Please note the Board will not consent any permanent or temporary construction within the 9 metres BYELAW easement. Please refer to the Board's Nine Metre Easement Policy for further information: <https://www.w4idb.co.uk/resources/document-library/consent-forms-and-guidance/>

Where any proposed cables are to be directionally drilled beneath a watercourse, consent will be required and must be at agreed depths. More detail on this can be supplied and should be discussed in further detail.

3. There are several Riparian watercourses that exist within the boundary of the proposed works and to which the Land Drainage Act applies:

Under the terms of the Land Drainage Act 1991, the prior written consent of the Board is required for any proposed temporary or permanent works or structures within any watercourse including infilling or a diversion.

4. Board's Byelaw consent is required to directly discharge surface water to a watercourse (open or piped). A surface water development contribution (SWDC) will be charged on all rates of discharges. Please refer to the Board's Development & Consent Control Guidance for more information: <https://www.w4idb.co.uk/resources/document-library/consent-forms-and-guidance/>

5. The Board does not fully support the use of subbase reservoirs and questions their suitability as an effective long term SUDS solution.

6. Board's Byelaw consent is required to discharge treated water to a watercourse (open or piped).

7. Board's Section 23 consent is required to culvert, pipe, or bridge any watercourse riparian or Board maintained.

8. The suitability of new soakaways, as a means of surface water disposal, should be to an appropriate standard and to the satisfaction of the Approving Authority in conjunction with the Local Planning Authority. If the suitability is not proven the Applicant should be requested to re-submit amended proposals showing how the Site is to be drained. Should this be necessary this Board would wish to be re-consulted.

9. A permanent undeveloped strip of sufficient width should be made available adjacent to the top of the bank of all watercourses on Site to allow future maintenance works to be undertaken. Suitable access arrangements to this strip should also be agreed. Access should be agreed with the Local Planning Authority, Lincolnshire County Council and the third party that will be responsible for the maintenance in consultation with the Internal Drainage Board where a watercourse is subject to Byelaws.

10. All drainage routes through the Site should be maintained both during the works on Site and after completion of the works. Provisions should be made to ensure that upstream and downstream riparian owners and those areas that are presently served by any drainage routes passing through or adjacent to the Site are not adversely affected by the development. Drainage routes shall include all methods by which water may be transferred through the Site and shall include such systems as "ridge and furrow" and "overland flows". The effect of raising Site levels on adjacent property must be carefully considered and measures taken to negate influences must be approved by the Local Planning Authority.

Consideration must be given to the route of flow downstream of the site from the discharge point to an appropriately maintained watercourse. Are there any off site works or the need for increased maintenance required to safeguard the site discharge for the life of the development.

12. SUDS/drainage response sent to LCC.

Resident objection – received via the portal

Representing residents of Kirton and my own concerns as to the proposed application by the National Grid to erect 420 Pylons from Grimsby all the way through the Lincolnshire Wolds and the lower Fens of Lincolnshire I find disgusting. The concerns that I have are that this is to go right through the area of outstanding natural beauty of the Lincolnshire Wolds and the unusual natural

flat lands of the Fens both of which are unique features of the beautiful county of Lincolnshire. The sight of these 420 Pylons dotted all the way down the length of the county and the into Norfolk creating a very ugly blot on the whole area. The fact that this project is of no benefit to Lincolnshire at all i feel that the area is just being used as a convenient route the get electricity to other parts of the country instead of it going down the East Coast to be brought ashore where it is needed. On another point i have been involved in Agriculture both as an Agronomist and Soil Management and the effect of this project will be very detrimental to the valuable land used throughout Lincolnshire for both cereal and more importantly vegetable production. soil types vary down the whole length of the project and serious irreversible damage will be done to soil structure and its potential to produce the maximum for. many years to come. The general environment will suffer/ tourism/ property prices/and the total visual effect of the whole area destroyed forever.

Review of the Scoping Report

At this stage the following comments are offered in connection with the topic areas as listed. As stated in the aforementioned section, where no opinion has been received from in-house advisors at the Council nor has there been an external consultant employed to provide comment then general observations have been put forward. Some chapters proposed in the scoping report are best covered by the County Council or other statutory stakeholders and so in this case as officers at the LPA we have remained silent.

Landscape and Visual

The potential visual receptors have been outlined, however representative viewpoints must be submitted and approved prior to the assessment being undertaken. Supporting Zone of Theoretical Visibility analysis, as defined within the scoping report and as noted below should also be provided to ensure that the proposed study area is sufficient.

ZTV methodology in Paragraph 6A.4.45 and 7A.4.51 notes features to be included within ZTV calculation. ZTV analysis should also include a bare-earth scenario to show the potential worst-case.

It is unclear from the Landscape / Visual methodologies how results of ZTV analysis will be presented. It would be most useful to aid in the understanding of visibility of the pylon route if, alongside blanket visibility additional ZTV plans indicate the number of pylons likely to be visible through the use of overlapping ZTVs.

ZTV analysis is proposed for pylon routes, ZTV analysis should also be undertaken for the maximum foreseeable parameters of development within substation compounds. The parameters used to inform these ZTVs should be included alongside them.

The Landscape and Visual methodologies including assumptions and limitations outlined within them are appropriate.

Visual representations are proposed to be in line with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019) noting a combination of type 2, 3 and 4 visualisations are proposed. Locations for representative viewpoints should be submitted for approval along with the type of visualisation proposed and appropriate justification for the visualisation type.

The proposed approach to assess impacts on both national, and local level landscape character areas is appropriate to allow for assessment of impacts at relevant scales.

NCA Profile 41: Humber Estuary can be scoped out of the assessment as stated in paragraph 6.5.43.

LCT 1: Industrial Landscape (Humber Estuary LCA) can be scoped out of the assessment as stated in paragraph 6.5.52.

RCLT 1B: Coastal Dunes, Beach and Intertidal Sand Flats, RLCT 1C: Shallow Coastal Waters, RLCT 1A: Coastal Saltmarshes and Mudflats, RLCT 1E: Offshore Industries, Fisheries and Navigations can be scoped out of the assessment as stated in paragraph 6.5.56.

RLCT 4B: Wooded Vales can be scoped out of the assessment as stated in paragraph 6.5.57.

LCA E4: Marshland St. James can be scoped out of the assessment as stated in paragraph 6.5.61.

Table 6.2: Impacts, receptors and potential for significant effects and Table 6.3: Proposed scope of the assessment outline elements to be scoped in and out of the assessment in line with reasoning highlighted above, no changes proposed to elements scoped in or out here.

Table 7.2: Impacts, receptors and potential for significant effects notes the elements to be scoped in and out of the visual assessment, no changes proposed to elements scoped in or out here.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, the LVIA should consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics. The EIA process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

Cumulative schemes to be included within cumulative assessment should be submitted prior to undertaking assessment.

As officers we are concerned about the extent of overhead cables and this is echoed in some of the internal and external responses received.

Ecology and Biodiversity

At this early stage in the development of the Scheme, only limited desk-based information has been presented within the Scoping Report.

The Scoping Report details that on respect of biodiversity, key consultees have been identified for engagement throughout the ore-application stages of the process.

The biodiversity assessment will consider the potentially significant effects on biodiversity receptors that may arise from the construction and operation of the Scheme.

The Councils ecologist has not responded and the Wildlife Trust may have chosen to comment directly on the consultation, however having reviewed the information put forward within the Scoping Report, the approach taken appears reasonable in the methodology and we have no specific comments to offer other than the importance of achieving a 10% biodiversity net gain for this proposed nationally significant development, in line with The Environment Act 2021.

Cultural Heritage

No comments have been received from the Council's Archaeological and Cultural Heritage consultant, however having reviewed the information put forward within the Scoping Report, the approach taken appears reasonable in the methodology and we have the below comments to offer:

- The Council would expect a detailed landscape and visual assessment for any above ground features and for each to be looked at separately pending the final location and scale.
- We would expect a scheme of trail trenching to be included as part of the main planning submission.

Geology and Hydrogeology

Boston Borough Council do not have an in-house geologist and the Coal Authority and the County Council may have chosen to comment directly on the content of the consultation, however having reviewed the information put forward within the Scoping Report, the approach taken appears reasonable in the methodology and we have the below specific comments to offer:

- Soil management practices may need further evidence

Lincolnshire County Council act as Lead Local Flood Authority and may comment directly to the proposed development. having reviewed the information put forward within the Scoping Report, the approach taken appears reasonable in the methodology and we have no specific comments to offer.

Agriculture and Soils

The council do not have a specific officer to deal with such matters however this topic area is of fundamental concern to the Council simply due to the amount of land that is associated with the development. The NPPF is clear that planning policies and decisions should contribute to and

enhance the natural and local environment by (amongst other criteria) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); and recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland. Natural England provide extensive guidance on the matter and the Applicant is urged to follow this in their preparation of their work as it is acknowledged that this is effectively a desire to challenge the current agricultural classification of the site (please see <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>).

These comments are echoed by internal consultees including elected councillors who have significant concern over the impact of the development on Grade 1 agricultural land.

Planning policy officer have also commented stating that whilst we understand the Grimsby to Walpole 'New Walpole Substation Location Options report' shows underground DC is very much more expensive than the overhead AC line option however, in general terms from the point that the EG3 & 4 schemes come on shore they have a similar route to Weston and then the Walpole. We would encourage the Applicant to explain in clear terms why the schemes cannot be more joined up and allow more undergrounding of the overhead line. This is echoed in detailed comments from Holbeach Parish Council and we would invite the Applicant to review these comments as officers feel they are well informed and justified.

Traffic and Transport

Lincolnshire County Council act as highways authority and may comment directly on the proposed development. Having reviewed the information put forward within the Scoping Report, the approach taken appears reasonable in the methodology and we have no specific comments to offer other than the following points:

- The suitability of the rural roads, many of which are in poor condition (e.g. subsidence), to cope with the loading by heavy construction vehicles. What mechanism is in place for any urgent reinstatement. Is a survey of the roads (and any strengthening needed) to be carried out at the commencement of works?
- What restrictions will be placed on working hours/days?
- What is the procedure in place to deal with complaints from residents regarding access, noise, dust etc.?
- Construction compounds and field accesses in the countryside can have a significant affect and we would therefore welcome a full scheme of remediation and reinstatement after the cable/works have been undertaken.

Noise and Vibration

No objections have been received by the Council's Environmental Health Officer however as officer we have reviewed the information put forward have the following comments:

1. Please provide the LPA with appropriate contact details in event of complaints during construction
2. Ensure the LPA and all relevant Noise sensitive receptors (NSR) in the immediate area are informed of any proposed works outside of normal working hours
3. Maintain sound barriers in good order
4. Vibration, ensure the LPA and all Vibration Sensitive Receptors in immediate area are informed of operations such as piling where vibration is likely to exceed 0.3mms and ensure appropriate monitoring equipment is used in vicinity of works

Air Quality

The Council's Environmental Health Officer has no objection, however the following comments are provided in relevance to the development at this stage:

- Burning of waste should be avoided. Any burning of waste deemed strictly necessary should be undertaken in accordance with the relevant waste management exemption issued the Environment Agency, and consideration should be given to the timing of such burning, and the prevailing weather conditions to impact emissions to air and nuisance to offsite receptor's; and
- Soil stockpiles should be sealed to recued fugitive dust emissions.

Water Environment

This topic area will be covered by engagement with the County Council however please note we have received comments from Witham Fourth District Internal Drainage Board who have expressed significant concern over the impact on their watercourses and operations.

Concluding Remarks

Whilst we appreciate many stakeholders will comment directly to the Applicant on the project, we wanted to provide a response based on the submitted Scoping Report with assessment of the proposed onshore cable route and associated switching and convertor stations and substations.

We note your community engagement to date however we would welcome future discussions over any proposed community benefits as well as any proposed employment and skills schemes that could be provided to the local workforce as well as any other potential grid infrastructure improvements that may be facilitated by the development.

This advice is based upon the information available at this time. Please note that the advice is given without prejudice to any future comments made by the Local Planning Authority upon the receipt of further information, whether during or before the submission of a full EIA planning application.

We kindly ask that the comments received from stakeholders listed are taken into consideration as you can see there is in part strong feelings about the proposal.

If you have any queries, please do not hesitate to contact me on the details provided and I would appreciate it if all future correspondence could be made directly to myself as I have been instructed by the Local planning Authority to act on their behalf until the end of the application process. This will avoid any delays in our response as we have struggled to allow internal consultees sufficient time to get back to us.

Yours sincerely,

Sam Dewar
Consultant Planning Officer

@dpaplanning.co.uk


From: [Hobson, Chris](#)
To: [Grimsby to Walpole](#)
Cc: [Planning](#)
Subject: Grimsby to Walpole Project: Application by National Grid Electricity Transmission plc (the Applicant) for an Order granting Development Consent for the Proposed Grimsby to Walpole
Date: 28 August 2024 15:34:37

You don't often get email from [REDACTED]@breckland.gov.uk. [Learn why this is important](#)

Dear Planning Inspectorate,

Thank you for your correspondence of the 6th August with regards to the above Nationally Significant Infrastructure Project (NSIP).

Having reviewed the project information and particulars we can confirm that Breckland Council do not have any further comments to make on the project.

I trust the above clarifies the Council's position.

Kind Regards,

Chris Hobson

Principal D M Planner
Breckland Council

T: [REDACTED]
M: [REDACTED]

Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE



Email disclaimer:

The information contained in this email is confidential and intended only for the person or organisation to which it is addressed. If you have received it by mistake, please disregard and notify the sender immediately. Unauthorised disclosure or use of such information may be a breach of legislation or confidentiality and the content may be legally privileged. Any improper dissemination, forwarding, printing, or copying of this email is strictly prohibited. Emails sent from and received by employees of Breckland District Council may be monitored. They may also be disclosed to other people under legislation, particularly the Freedom of Information Act 2000, GDPR, the Data Protection Act 2018 and the Environmental Information Regulations 2004. If you have contacted the Council for a service any personal data you share will be used to help you access its services, or to answer your enquiry in line with our Privacy Policy. For full details of your rights please visit our website at www.breckland.gov.uk. Unless this email relates to Breckland District Council business it will be regarded by the Council as personal and will not be authorised by or sent on behalf of the Council.

Hannah Terry
The Planning Inspectorate
Environment Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Ms Cally Smith
Planning Consultant

██████████
██████████@broads-authority.gov.uk

Date 13 August 2024 Our ref BA/2024/0302/SCOCO Your ref

Dear Hannah Terry

Application No: BA/2024/0302/SCOCON
Proposal : EIA Scoping Notification and Consultation - Grimsby to Walpole Project
(the Proposed Development)
Address : Grimsby To Walpole Project, , ,
Applicant : Mrs Cassie Fountain

I write further to the above proposal. I can confirm that the Broads Authority does not have any comments to make regarding this consultation.

Yours sincerely

Ms Cally Smith
Planning Consultant
On behalf of the Broads Authority

My ref: GW.EIA.020924
Your ref: EN020036
Date: 02 September 2024
Contact: Alice Tithecott
Email: NSIPs@cambridgeshire.gov.uk

Place and Sustainability

New Shire Hall
Emery Crescent
Enterprise Campus
Alconbury Weald
Huntingdon
PE28 4YE

Sent via email to:
grimsbytowalpole@planninginspectorate.gov.uk

Dear PINS,

Environmental Impact Assessment (EIA) Scoping consultation by National Grid Electricity Transmission PLC (“the Applicant”) for the Grimsby to Walpole Project Development Consent Order (DCO) proposals

I am writing on behalf of Cambridgeshire County Council (the Council) in response to your request dated 06 August 2024 regarding the Applicant’s EIA Scoping Report for the Grimsby to Walpole project proposals. The Council understands that the Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008, and that the Applicant has sought a Scoping Opinion from the Planning Inspectorate (PINS), on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Council acknowledges that it has been identified by PINS as a consultation body to inform the Scoping Opinion. Attached to this letter is a table containing the Council’s views on this matter.

If you have any queries regarding this submission or require any further information, please contact NSIPs@cambridgeshire.gov.uk.

Yours sincerely,

Emma Fitch (Miss)

Service Director: Planning, Growth and Environment

Cambridgeshire County Council

Grimsby to Walpole: Comments on the Applicant's EIA Scoping Report

This document sets out the comments by Cambridgeshire County Council (**the Council**) regarding National Grid Electricity Transmission PLC's EIA Scoping Report for the Grimsby to Walpole project proposals.

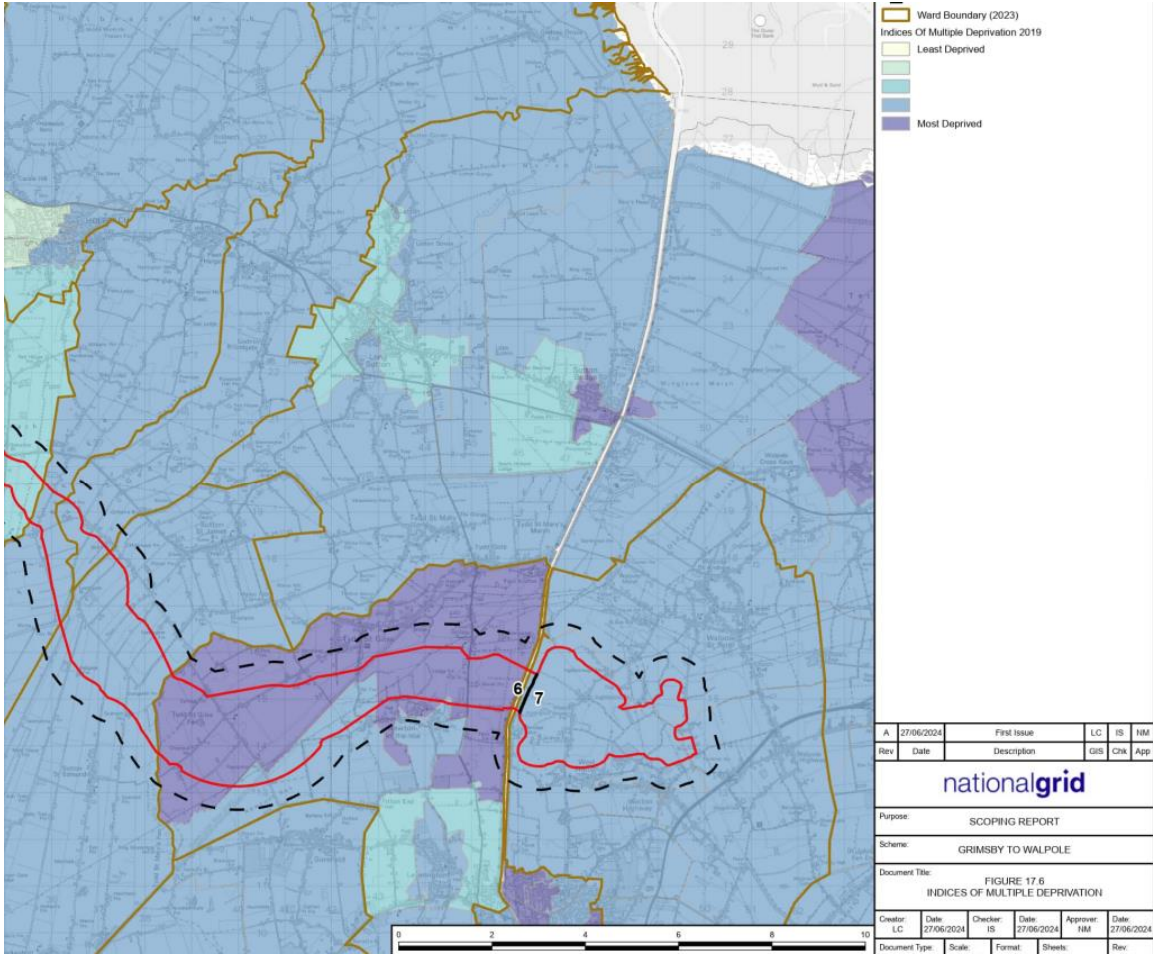
The following table contains comments across a number of technical specialisms.

Specialism	Proposal aspect referred to	Comments
Air Quality		The Council is not the statutory consultee for this subject area and so would expect PINS to consult Fenland District Council on this matter. The Council would defer to Fenland District Council for a detailed response.
Noise		The Council is not the statutory consultee for this subject area and so would expect PINS to consult Fenland District Council on this matter. The Council would defer to Fenland District Council for a detailed response.
Climate and Carbon	Climate Change Resilience Assessment (18.1.3 and appendix 18A)	The Council disagrees with the statement that no further assessment of the Project's vulnerability to climate change is required. The Council is of the view that this should not be scoped out. The fact that a preliminary assessment has already been carried out is not sufficient – this topic should also be in scope of the EIA, since it is clear that there is potential for the effects of climate change (such as extreme heat, floods, wildfires, high winds and storms) to impact the Project.
	Greenhouse gas emissions (chapter 18, especially table 18.2)	The Council broadly agree with the contents of Table 18.2 in terms of what Greenhouse Gas (GHG) emissions should be scoped in or out of the EIA.

Specialism	Proposal aspect referred to	Comments
		<p>However, there is some inconsistency between user utilisation of infrastructure (B9) being scoped out, and benefits beyond the system boundary: exported utilities (D) being scoped in. These should be treated the same (both scoped in) as there are analogies between the two things.</p>
Health	Chapter 17 Health and Wellbeing	<p>The Council's Public Health team is of the view that the Applicant's methodology seems sound across the EIA as a whole and Chapter 17.</p> <p>The Council would welcome a full Health Impact Assessment (HIA) setting out appropriate mitigation measures if required.</p> <p>Regarding <i>Table 17.9: Impacts, receptors and potential for significant effects</i> the Construction phase appears to be well addressed within the scope of the EIA.</p> <p>In <i>Table 17.9: Impacts, receptors and potential for significant effects</i> the Operational Phase has scoped out</p> <ul style="list-style-type: none"> • <i>Potential permanent impacts during operation associated with the generation of EMFs.</i> <p>The Council notes that public concern regarding electric and magnetic fields (EMF) could give rise to potential anxiety in local populations, and therefore request that a mental health assessment is carried out. The Council acknowledge that a full EMF report will be submitted separately.</p> <p>Under <i>Table 17.1: Engagement with Stakeholders</i>, the Council notes Norfolk County Council requested the same as above, with the resulting response:</p> <p><i>The health and wellbeing assessment of the PEI Report and ES will consider direct and indirect impacts on health and wellbeing. The Project will be designed to comply with existing National Grid standards and the guidelines and policies detailed in NPS-EN5 (Ref 17.13) including the International Commission on Nonionizing Radiation Protection guidelines for electric and magnetic fields (EMFs) and associated precautionary policy (Ref 17.11). National Grid August 2024 Grimsby to Walpole 17-6 Organisation Summary of response Consideration in the Scoping Report An EMF report will be prepared as part of the Project. This is separate to the EIA process. A mental health assessment is not currently scoped into the health and wellbeing assessment of the PEI Report and ES, however further engagement with the Norfolk Country Council will be undertaken to ensure mental health is considered appropriately.</i></p>

Specialism	Proposal aspect referred to	Comments
------------	-----------------------------	----------

The Council is concerned that a mental health assessment across all districts is necessary, not just Norfolk, and especially Fenland must be considered and reviewed appropriately. As highlighted in the maps, section 6 (Overhead line from Weston Marsh Substation South Holland to Walpole B Substation Fenland) runs through some of the most deprived areas of Fenland and it must be clearly shown that health inequalities and perceived health risks are not exacerbated.



Specialism	Proposal aspect referred to	Comments
		<p>The size of the study area at 5km on either side of the scoping boundary is acceptable.</p> <p><i>Table 17.6: Healthcare and social infrastructure</i> highlights 3 schools in Fenland are within 500 m of scoping boundary and <i>Table 17.7: Open space</i> 3 recreational areas – in relation to inequalities and deprivation in Fenland, the Council would like to know the health impacts.</p> <p>The Council agrees with <i>Table 17.13: Summary of proposed scope of the assessment</i> with regard to receptors.</p>
Biodiversity	Chapter 8: Ecology and Biodiversity	<p>8.5.2 The Council welcomes the inclusion of internationally designated nature conservation sites within 30km of the study area with birds that are listed as qualifying features, including the Nene Washes Special Protection Area (SPA)/ Ramsar and Ouse Washes SPA / Ramsar sites that are located within Cambridgeshire.</p> <p>8.5.62 The Council notes that winter bird surveys have been completed. However, the Council is concerned that “<i>There were some differences between the coverage of surveys and the current Scoping Boundary. These differences were focused at the southern extent of the Survey Area between Weston Marsh and Walpole.</i>” Further surveys must be completed to ensure that sufficient evidence is provided to demonstrate if land within the scoping boundary is utilised by qualifying feature (bird species) for the Ouse Washes SPA/Ramsar or Nene Washes SPA/Ramsar sites, and determine the potential impact of the scheme on these species. This will be essential to inform the preferred route corridor, so that potential pathway of bird mortality resulting from in-flight collisions can be avoided.</p> <p>8.5.48-8.5.50 The scoping report does not adequately recognise the importance of the Fens for many threatened invertebrates, including internationally and nationally important aquatic species. The drains within Fenland support a variety of these species, which must be adequately considered as part of any works to watercourses or drainage network.</p> <p>Table 8.4. The Council agrees with the proposed scoping in of statutory and non-statutory designated sites, priority and notable habitats, ancient woodlands and ancient / veteran trees, as well as protected and notable species (including aquatic macrophytes and macroinvertebrates).</p>

Specialism	Proposal aspect referred to	Comments
		<p>Table 8.4 – row 2, page 8-39. The Council recommends that Nene Washes SPA / Ramsar and Ouse Washes SPA /Ramsar are included as potential “receptors” under row 2 of Table 8-4 (page 8-39) given that insufficient bird survey work has been completed to confirm whether or not functionally linked land will be impacted by the scheme.</p> <p>Table 8.4 – row 2, page 8-45. The Council welcomes the inclusion of ‘bird colliding with infrastructure’ within the operational phase for both breeding and non-breeding birds. However, the Council is unclear why there is not specific mention for bird populations associated with wildlife designations (e.g. Nene Washes / Ouse Washes). Currently, the table appears that the scheme will not impact these international sites during the operational phase, however, the Council has yet to see any evidence that flyways for designatory bird species will be avoided. The Council suggests that a specific row is included to address operational impacts to international bird populations / assemblages.</p>
Archaeology and Historic Environment	<p>Chapter 9: Cultural Heritage</p> <p>Appendix 9B Heritage Survey Strategy.</p>	<p>The Council agrees that impacts through all phases of development should be scoped in, as well as temporary infrastructure such as haul roads, compounds etc.</p> <p>As per the Council’s comments on the Appendix below, in order to develop mitigation strategies, the Council would strongly advise that trial trenched evaluation is undertaken and submitted as part of the final EIA chapter. Geoarchaeological boreholes will also be key to understanding the deposit models in deeper fen environments. Geophysics may have more limited use in deeper fen, however may be able to be utilised over areas of higher ground such as roddons, which can be identified from analysis of LiDAR and DSM data.</p> <p>The route crosses a deep portion of the fen, which has high archaeological potential, however it will be difficult to identify the archaeological potential of these areas without intrusive investigation due to the nature of the fenland deposits. Initial work looking at LiDAR evidence to identify where the route intersects with roddons will be important. Geoarchaeological borehole work should also be undertaken, looking to get transects across the roddons and the deep fen, aiming to identify roddon crests and buried soils indicative of buried dryland environments. The Council has found that geophysics has had varied results in the fen, however has been useful picking up roddons, and later paleochannels which can improve where these boreholes are targeted.</p> <p>The Council is concerned in regards to the discussion relating to trial trenching being limited prior to consent e.g.</p> <ul style="list-style-type: none"> • The final table ‘Limited use focused on specific areas’. • 9B.2.22 ‘deferring fieldwork post-consent’

Specialism	Proposal aspect referred to	Comments
		<ul style="list-style-type: none"> • 9B.2.24: Where the presence and significance of the archaeology is understood, trenching will not be undertaken. <p>The Council strongly advises that trenching should be undertaken prior to consent and included in any forthcoming EIA chapter, targeting all areas of sub-surface impact. The Council cannot effectively advise on mitigation strategy without intrusive trial trenching works to determine the significance, presence and survival of archaeological remains. This is particularly the case in fenland regions where archaeologically significant buried remains may be present, which will be very difficult to identify using other techniques. The Council would require a strong commitment to trenching prior to consent, as non-intrusive works only will not provide the information needed to inform mitigation.</p> <p>2.3.7 suggests that mitigation in the form of preservation in situ areas are to be considered. If this approach to mitigation is to be considered these areas will need to be trenches to judge the appropriateness of any proposed changes to construction techniques. The Council would also require any areas mitigated through preservation in situ to be secured via an Archaeological Management Plan, however the Council would be happy to discuss this following the results of evaluation works.</p>
Landscape and Visual	Appendix 7A: Visual Assessment Methodology	<p>Paragraphs 7A.4.12 to 7A.4.16 outline the selection of viewpoints for the assessment of visual impacts on receptors. Para 7A.4.13 describes the type of publicly accessible viewpoints that will be in scope of the assessment, and focuses on “nationally designated or regionally promoted public rights of way (PROW)”. However, for the part of the study area that falls within Cambridgeshire, there are no nationally or regionally promoted PROW. Nevertheless, the proposed development will directly impact users of a number of PROW within Cambridgeshire, and it would be concerning if the visual impacts of the development on receptors using those PROW were not considered as part of the visual assessment. The Council requests clarity on this point.</p> <p>Paragraphs 7A.4.6 to 7A.4.9 detail the consideration of possible inter-project effects. It should be noted that a recently approved Development Consent Order (DCO) for the MVV Energy from Waste facility at southern Wisbech will introduce a substantial vertical feature into the flat Fenland landscape. The area over which the MVV development will have a visual impact is likely to intersect with the 5km study area for the Grimsby-Walpole project. The cumulative visual impact of both these projects in the area where the effect on receptors overlap should be scrutinised in the visual impact assessment.</p>
Minerals and Waste		No comments.

Specialism	Proposal aspect referred to	Comments
Water Resources and Flooding	<p data-bbox="394 233 584 320">Scoping report Paragraph 10.6.4</p> <p data-bbox="394 360 584 448">Scoping report Paragraph 10.6.5</p> <p data-bbox="394 767 584 855">Scoping report Paragraph 10.7.13</p> <p data-bbox="394 903 584 991">Scoping report Paragraph 10.8.3</p>	<p data-bbox="636 233 1993 288">The Council advises that the applicant considers the easements on Internal Drainage Board (IDB) drains, as this may be up to 9m from the top of bank of watercourses.</p> <p data-bbox="636 328 2016 496">GG16 – The management of water during construction is critical. This section outlines the general principles of water management and protections to watercourses. Water during construction can contain high levels of sediment which must be managed on top of the risks outlined around the other construction implications. Settlement ponds, regular maintenance, and other temporary drainage features for this period are integral to protecting the surrounding water environment.</p> <p data-bbox="636 536 1948 592">W02 - Noting that this covers the temporary lagoons, this seems to be in relation to open watercourse crossings, and should be clearly proposed in the site area in line with comments above.</p> <p data-bbox="636 632 1993 687">W10 - Severance of drainage channels should be avoided where possible with culverting of watercourses considered a preference and priority for continued passage of water.</p> <p data-bbox="636 767 1971 823">The use of Sustainable Drainage Systems (SuDS) is supported by the Council, but it must be noted that the inclusion of proprietary treatment is only agreeable in areas SuDS are not appropriate.</p> <p data-bbox="636 903 2016 959">Specifically, the Cambridgeshire Surface Water Guidance for Developers document and Flood and Water Supplementary Planning Document (SPD) for the area in Fenland.</p>
Traffic and Transport	<p data-bbox="394 1046 584 1134">Scoping report vol 1. Chapter 13.</p>	<p data-bbox="636 1046 2004 1182">The Transport Assessment will include “the impact of the construction works and operation of the project on the transport network.” This will need to include disaggregated (by vehicle class) trip generation and trip distribution forecast for the entire construction phase shown as typical daily flows. If construction intensity is expected to be variable, then the peak activities need to be highlighted.</p> <p data-bbox="636 1222 1982 1278">Detail of any temporary construction accesses of physical mitigation works to be included and any major works (change to centreline) to include Stage 1 Road Safety Audits.</p> <p data-bbox="636 1326 1993 1382">The Construction Traffic Management Plan needs to include construction / delivery routing and measures to limit traffic volumes where appropriate. Other measures to ensure the highway’s integrity is maintained</p>

Specialism	Proposal aspect referred to	Comments
		<p>during construction to be included as necessary. Any damage done to the network during construction will need to be repaired.</p> <p>The construction routing shall stay to A and B classified roads as long as possible in line with the Council's Heavy Goods Vehicle (HGV) Policy which can be found using the following link:</p> <p>HGV Policy - Heavy Goods Vehicle (HGV) Policy Cambridgeshire County Council Advisory Freight Map - https://www.cambridgeshire.gov.uk/asset-library/cambridgeshire-advisory-freight-map.pdf</p> <p>Large vehicle routing on single width roads (less than 5.5m wide) to be accompanied by swept path analysis as necessary to demonstrate feasibility of routing.</p>



Secretary of State
The Planning Inspectorate
Environmental Services
Temple Quay House
2 The Square
Bristol
BS1 6PN

Your Ref EN020036

Our Ref IPP-238

Friday 30 August 2024

BY EMAIL ONLY: grimsbytowalpole@planninginspectorate.gov.uk

EN020036 - Grimsby to Walpole Project ("the Project") - EIA Scoping Report Notification and Consultation

Thank you for your consultation on the Environmental Impact Assessment Scoping for the above project.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation.

Having reviewed the location of the Project and the Scoping Report (August 2024), we wish to make the following comments:

The Trust is Navigation Authority for the River Witham and is the freehold owner of the riverbed between the Grand Sluice, Boston and Lincoln. The River Witham falls within Section 4 (Figure 1.1 Scoping Boundary) with Figure 3.2 showing the Northern, Central and Southern Corridors crossing the River Witham northwest of Boston with the preference being towards the Central Corridor on the Graduated Swath (Figure 3.7) **between Anton's Gowt and Langrick Bridge.**

The Scoping Report provides information on the likely nature and form of the proposed development and identifies areas of potential impacts. The proposed methodologies identified in the report appear to be broadly appropriate.

A unique attraction of our waterways is based on its visual amenity value, in addition to its significance as a heritage and wildlife corridor and as a sustainable transport route. It is essential that the amenity value of our network is protected, and that no development takes place that may adversely affect the experience of waterway users. The Water Rail Way (part of the National Cycle Network) beside the River Witham provides a popular route for leisure and recreation as part of the wider network of a public rights of way and cycle routes in the area.

We understand from the Scoping report that the majority of works will take place above ground, which would include above-ground crossings of the River Witham. We request that the Environmental Report should provide further clarity about the proposals relationship with the Eastern Green Link 3 and 4 project (EN0210003), as well as its interaction with the Triton Knoll Electrical System (EN020019) which crosses the River Witham **between Anton's Gowt and Langrick Bridge.**

Canal & River Trust Planning Team

Canal & River Trust, National Waterways Museum, Ellesmere Port South Pier Road Ellesmere Port Cheshire CH65 4FW
T: 0151 355 5017 E: nationalwaterwaysmuseum@canalrivertrust.org.uk W: canalrivertrust.org.uk

Cable Route Corridor

The Scoping Report identifies a cable route corridor which includes a stretch of the River Witham between Anton's Gowt and Langrick Bridge. We note that assessment work is ongoing, and the final route of the corridor has not yet been finalised. We strongly recommend that the Trust is included in discussions over the location of the cable crossing so we can advise on any potential issues likely to affect navigational safety or our interests as an affected landowner.

Any crossing of the river is likely to require the prior consent of the Trust. Please be advised that the Trust is a statutory undertaker and has specific duties to protect its waterways. We would therefore resist any proposed use of compulsory purchase powers which may affect our land or undertakings. We reserve the right to seek protections under s127 of the Planning Act 2008 should any proposals affect land which has been acquired for the purposes of our undertaking. Accordingly, we advise that the acquisition of any Trust land or rights over Trust land **should be secured by agreement and we strongly recommend early contact with the Trust's Utilities Team to commence discussions over the terms of such an agreement ahead of submission of the DCO application.** Please contact Beth Woodhouse, Senior Utilities Surveyor, at [REDACTED] [@canalrivertrust.org.uk](mailto:[REDACTED]@canalrivertrust.org.uk) or on [REDACTED] for further advice.

As the proposal will involve survey and works affecting the Trust's waterways, in our capacity as landowner, we will also require the applicant/developer to comply with the Trust's current Code of Practice for Works Affecting the Canal & River Trust and recommend early discussion with the Trust's Infrastructure Services Team over all works likely to affect Trust property. Please contact Nicholas Marsh, Works Engineer, at [REDACTED] [@canalrivertrust.org.uk](mailto:[REDACTED]@canalrivertrust.org.uk) or on [REDACTED] for further advice.

Landscape and Visual Effects (Chapters 6 and 7)

An above ground installation crossing our network as proposed will carry both long-term landscape/visual impacts and disturbance implications to facilitate construction. Indeed, paragraph 7.10.2 identifies that visual receptors affected by the project would include recreational receptors on the waterways including rivers and canals.

Table 7.2 highlights that the Environmental Statement will include an assessment of the impact of construction and operation works on people using Public Rights of Way (PRoW) and waterways (within 3 km of the Project), which we understand will include an assessment of the River Witham.

The Scoping Report highlights that the design of the new project will seek to accord with the aims of National Policy Statement EN-1 and EN-5 through the adoption of the Holford Rules (Ref 2.41) and Horlock Rules (Ref 2.42).

We wish to highlight that the nature of the landscape west of Boston, which is flat, with limited tree cover, would limit the opportunity to adopt certain parts of the Holford Rules concerning cable routing. For example, rule 4 of the Holford Rules requires above ground cable routes to choose tree and hill backgrounds, whilst rule 5 seeks cable routes to prefer open valleys with woods to limit the apparent scale and height of new cable routes. The landscape next to the River Witham would not allow for the adoption of either of these rules.

Consideration should be given within the Environmental Report specifically as to the visual impact of the new cable crossing of our network where the local landscape does not provide for easy visual mitigation of the works. Specific mitigation should be identified to ensure that the visual impact on the landscape in this location is visually acceptable. The potential for undergrounding works should be considered as one option.

River users would pass the position of the new crossing at a relatively low speed and would be susceptible to changes to the local landscape. **We request that the Visual Impact Assessment proposed should include an assessment of the proposed changes to the landscape at the crossing location on the River Witham.** Within Appendix 6, Table 6A.2 provides indicators of landscape receptor susceptibility. The list appears broadly

Canal & River Trust Planning Team

Canal & River Trust, National Waterways Museum, Ellesmere Port South Pier Road Ellesmere Port Cheshire CH65 4FW
T: 0151 355 5017 **E:** nationalwaterwaysmuseum@canalrivertrust.org.uk **W:** canalrivertrust.org.uk

appropriate. We wish to highlight that our waterways have local heritage value (due to their age and association with historic industrial/agricultural development in the areas they run), as well providing spaces of recreational and ecological/biodiversity value. These highlight that the River Witham has a High to Very High landscape value and should be considered accordingly.

With respect to the Visual Assessment described in Chapter 7, **we request that the River Witham (notably at the position of any proposed crossing) should be included as viewpoints within the associated assessment**. This would be necessary to ensure that the impact on our network and its associated users can be fully made. Identification of heritage assets, waymarked walks/cycleways, and other attractions along the river is also crucial in assessing the visual impact assessment on the waterway's amenity value, significance and setting.

The scoping report states that lighting impacts will be assessed. There is a risk that lighting near our network could distract boaters at dusk. We therefore request that more clarity should be provided with regards to the location of lighting and potential impact on our waterways as part of the assessment.

Ecology and Biodiversity (Chapter 8)

The River Witham offers a potential habitat for waterborne species, such as amphibians, mammals (including otter), fish and waterborne plants. We understand that the Environmental Report will be supported with a study of biodiversity and habitats, and that the River Witham is included in the study boundary.

As identified within the submission the River Witham provides linear mixed habitats, but it is also important as a flight line for birds and bats. **Therefore, it must be ensured that any cable crossings have measures in place that reduce the chance of cable strikes by birds.** Additionally, any construction phase activities should be kept away from the waterway to minimise any disturbance to the corridor. Appropriate physical measures such as flight deflectors must be used to ensure that harm to birds as a result of colliding with the overhead lines is minimised.

The proposed route falls within a priority species target area for Lapwing, which require farmland and managed wet grassland habitats with wide open landscapes during the breeding season. All vegetation works should be outside of bird nesting season.

Water vole surveys on all banks should be included in the assessments, because the River Witham is not far from Norfolk where they have recently eradicated mink and water vole numbers are recovering. Surveys over multiple seasons will be needed as numbers are hoped to grow exponentially by 2030.

Invasive species known to be present on the River Witham:

- Azolla Water Fern is present around Antons Gowt, and Floating Pennywort has been present in the past too. Both species cause issues with navigation. Strict biosecurity controls to ensure boots and equipment do not spread these to other watercourses should be always observed.
- To prevent the spread of Crayfish plague disinfection is required. The disinfectant must be one that is suitable for use near waterbodies.

Temporary construction lighting along the cable corridor route in the vicinity of the River Witham will have the potential to disturb wildlife. As a result, we believe the impact should be **scoped in** to assessments, with consideration given to the provision of mitigation measures to minimise impacts on ecology and biodiversity, as well as landscape and visual impact.

Should piling works be proposed for any pylons, we wish to highlight that such works can result in disturbance from vibration. As a result, we believe the impact should be included as part of the overall assessment.

Canal & River Trust Planning Team

Canal & River Trust, National Waterways Museum, Ellesmere Port South Pier Road Ellesmere Port Cheshire CH65 4FW
 T: 0151 355 5017 E: nationalwaterwaysmuseum@canalrivertrust.org.uk W: canalrivertrust.org.uk

Cultural Heritage (Chapter 9)

Due to their age and association with historic industrial/agricultural development, **our waterway network does form a heritage asset, and impacts upon the value and setting of this asset should be considered as part of the Environmental Statement.**

The Environmental Statement should consider the proposals' potential impact on heritage assets, such as Anton's Gowt Lock. This is a Grade II listed structure, and proposals (including surveying) should ensure they do not adversely harm the lock or its setting.

Works to install a cable crossing have potential to generate noise and vibration impacts and these effects on the river and users of the river should be assessed and considered within the Environmental Statement. In particular, works in proximity to the river need to be carefully managed to minimise the risk of significant vibration or loading that could adversely affect the stability of the riverbank or riverbed. In carrying out ground investigations it should be noted that while the Witham is a river, it has been significantly engineered in pre-industrial times, so ground conditions may be highly variable in the vicinity of the river. Detailed survey work will therefore be necessary to inform methodologies around the design of the cable crossing of the River Witham.

Water Environment (Chapter 10)

Works in proximity to our waterways have the potential to increase the risk of pollution to the River Witham through the runoff of silt-laden deposits or the release of dust during construction. There is a significant risk of contamination through poor sediment management from exposed soils, with specific risks likely associated with excavation and piling works in proximity to our network.

We understand that control measures will be incorporated as part of a Construction Environmental Management Plan, as opposed to being assessed within the Environmental Statement. In principle, the Trust has no objection to this approach, but requests that we are consulted upon the final details prior to their approval.

We understand that no direct discharge of water is proposed to our network. Should any discharge be proposed, then we request that this is detailed alongside any future application, and that the Environmental Statement assesses the impact of this on potential flood risk associated with our network. Please note that the Trust is not a land drainage authority, and our explicit consent would be required for any such works.

Traffic and Transport (Chapter 13)

Chapter 13 focusses on the potential impact of the project on highways. However, as the proposal would cross our network, **we request that the impact of the proposals upon navigable craft on the River Witham should be considered.**

Any closure of the navigation to facilitate construction would need to be designed to ensure that impacts on boat traffic are appropriately managed. Closure of the River Witham to facilitate construction would sever the connection across Lincolnshire to Boston and the navigations of East Anglia, which could have a significant impact on inland waterway users. We note that at paragraph 4.8.27 the protection of crossings prior to stringing of conductors does not mention protecting navigations such as the River Witham in the same way.

Boat users often plan routes several months in advance, and any unexpected closure could have significant economic impact upon our users, such as hire companies.

Consideration would be needed to ensure that any closures are planned to limit disruption to users. Any closures would need to be co-ordinated with the Trust and applied for via the Trust's Code of Practice, which stipulates specific winter stoppage dates and notice periods.

Canal & River Trust Planning Team

Canal & River Trust, National Waterways Museum, Ellesmere Port South Pier Road Ellesmere Port Cheshire CH65 4FW
T: 0151 355 5017 E: nationalwaterwaysmuseum@canalrivertrust.org.uk W: canalrivertrust.org.uk

Impact on traffic can be minimised if works can be co-ordinated to only occur during nighttime hours. Should it be demonstrated that this is not possible, then to minimise disruption to craft, work would need to occur during the winter stoppage season, for which a long notice period is required to allow for boat users to plan ahead in advance for any closure.

Opportunities may exist for the use of the River Witham for carriage of construction associated traffic to the site via waterborne craft, which could help reduce the need for carriage by road. This could help to reduce road miles and help improve the sustainability of the proposal, in line with the principles of section 2 of the National Planning Policy Framework. **We consider that options for alternative non-road based construction transport to and from the site, including use of the navigation, should be considered in the Environmental Report.** We would be happy to provide further advice upon this, should the applicant wish to explore use of our network for waterborne freight.

Socio-Economics, Recreation and Tourism (Chapter 16)

Impacts on the landscape and visual character of our waterway network or impacts to boat movements could have impacts upon the attractiveness of our network in drawing visitors to the area, with potential economic consequences. We request that this is considered as part of the Environmental Statement.

The Scoping Document identified that temporary impacts on PRoW during construction are to be considered. **We request that permanent impacts from changes to the visual character and attractiveness of these routes for users should also be considered to some degree. In addition, impacts on waterborne craft should also be considered.**

Visitor moorings lie close to the application area at Langrick Bridge and Anton's Gowt. Temporary or permanent closure of these during development could impact the local visitor economy.

Other Matters

The Louth Canal, which is within the cable corridor route southwest of Alvingham is neither owned nor managed by the Trust. However, pursuant to the charitable objectives of the Trust, the Trust supports the preservation, conservation and protection of inland waterways for the public benefit. We are aware that the Louth Navigation Trust (LNT) is dedicated to preserving the canal and encouraging future regeneration of the Louth Canal and support such initiatives. We recommend that you correspond directly with LNT and we advise that consideration is given to any response from LNT with regards to the impact of the proposal on LNT's preservation and regeneration objectives.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Hazel Smith MRTPI

Area Planner – Midlands

██████████ [@canalrivertrust.org.uk](mailto:██████████@canalrivertrust.org.uk)

██████████
<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

Canal & River Trust Planning Team

Canal & River Trust, National Waterways Museum, Ellesmere Port South Pier Road Ellesmere Port Cheshire CH65 4FW

T: 0151 355 5017 E: nationalwaterwaysmuseum@canalrivertrust.org.uk W: canalrivertrust.org.uk

From: [Gillian Pollard](#)
To: [Grimsby to Walpole](#)
Subject: Scoping Documentation
Date: 30 August 2024 11:46:19

You don't often get email from [REDACTED]. [Learn why this is important](#)

Covenham Parish Council

Chair Mrs Gillian Pollard

Langham House

Main Road

Covenham St. Mary. LN11 0PG

To The Planning Inspectorate Gov.uk

I as chair of Covenham Parish Council am writing to put forward our concerns and strong objection to the erection of The Grimsby Walpole Project.

We have discussed at length as a Parish Council the impact it would have on our joint villages of St.Mary and St.Bartholomew as well we have asked for comments from our residents. Therefore, I am forwarding our very great concerns to be added to the Scoping documentation.

I will take each concern in turn but no one of them is less a worry than the other.

Our Landscape, the clear view from Covenham to the Wolds AONB will be destroyed by pylons and cables. The route is particularly close to the village when it could be routed further west towards the old Grimsby to Louth railway line, however even this mitigation would still mean the tops of the pylons would be seen above the ANOB on the horizon. Why when the government is funding removal in other areas to improve visual impact on the environment is it not considering other options underground or better still out to sea?

As well as the aesthetics of having pylons the natural environment would be greatly affected during construction. Wildlife would be disrupted; their habitat removed or destroyed such as hedgerows and watercourses and our many footpaths. This is a great worry to all of us that live in and do our best to conserve the nature around us. Not

only that but the planned route crosses all roads into the village from West to South causing every country lane that it crosses to be blocked or subject to road construction, temporary traffic controls and heavy plant holding up our local traffic. Our dark skies also could be subject to light pollution. In fact residents daily live will be disrupted over the many weeks and months it will take to finish the project.

Business in the area will also be affected especially The Thomas Centre which is a specialist business serving the needs of families and children with special needs. Especially High Spectrum Autism. These children will not be able to cope with the disruption caused not only by construction but afterwards the physical presence of pylons on a previously open countryside. The noise factor also would be unbearable for children with severe autism both during construction but after with the possible hum from the electrical pylons and lines. All this turmoil could cause the business to cease to be viable.

Our area has many holiday lets, people come here for the beauty, peace and quiet of our lovely countryside, if access to properties become a problem and the environment becomes a construction site these properties will lose customers.

Infrastructure here is already strained, the local country roads are totally unsuitable for the transportation of the equipment required for the project.

What allowance has been made to upgrade these roads?

Safety is an issue too "Blue Light" services will struggle to reach the village within their required timescales if the roads are not clear resulting in potential loss of life.

Carbon footprint is another worry on people's minds, if as it appears all the steel etc has to come from overseas how can that be helping towards net zero?

Already the solar industry is ready to pounce to build huge solar farms if this project goes ahead, taking even greater chunks of our prime agricultural land, which is needed more now than ever to help produce our own food. Why import when we can grow it here providing our land is not taken over by huge metal monstrosities.

In conclusion I would like to leave you with a quote from one of our residents who said.

“ It will really ruin lots of people’s lives and completely spoil the quality of this county for natural beauty, tourism, family and the wellbeing of everyone”

I do hope you will take on board the worries and fears of the people that live here and ensure that all possible other avenues are explored, underground or preferably off shore and not just allow this to happen for the sake of cost cutting over people’s lives.

Thank You

Mrs Gillian Pollard

Chair Covenham Parish Council

From: [David Kempton](#)
To: [Grimsby to Walpole](#)
Cc: [Enquiries](#)
Subject: EIA Scoping and Consultation
Date: 30 August 2024 14:40:41

You don't often get email from [REDACTED] [Learn why this is important](#)

Comments on behalf of Crowland Parish Council

The Parish Council recognises and supports the need to expand and re-route the national electricity distribution network as an essential element of the country's commitment to eliminate carbon emissions in the medium term, and does not object to fairly sharing this new infrastructure.

However, the subject project proposal needs to fully consider and fairly compare the environmental as well as capital and operating costs of all alternative means of achieving its aims. These alternatives we believe to be overhead pylons, buried cables or under sea. The applicant should provide full financial and environmental impacts covering both construction and long term operation to justify the chosen network. These environmental impacts, especially, should encompass construction and operation over the expected life of the facility. Human quality of life in the area should have at least equal weight as other fauna and flora. The human environmental impact needs to consider all aspects including but not limited to physical health and wealth of residents and attractiveness to visitors in the area.

Changes to the "character" of the region will have significant second order impacts which should be fully explored and mitigated. It does seem that SE Lincolnshire is potentially going to suffer disproportionately from the proposed green energy infrastructure currently being planned, so the inspectorate needs to consider the combined impact of solar, wind and distribution infrastructure proposals on the area.

If pylons are deemed to be the best solution on balance, these will fundamentally harm the unique open fenland landscape forever. We are requesting, therefore, that serious community benefits should be committed over the entire life of the facility. Also, appropriate areas of shrubs and trees should be included to soften the visual impact and offset loss of habitat.

David Kempton
vice chair, Crowland Parish Council.



Environmental Services
Operations Group 3
Temple Quay House
2 The Square Bristol
BS1 6PN

By email
grimsbytowalpole@planninginspectorate.gov.uk

This matter is being dealt with by:
Gemma Driver

Email: [REDACTED]@eastcambs.gov.uk

Phone: [REDACTED]
My reference: 24/00829/NSIP
Your reference: NA

Date: 19 August 2024

If you require this letter in large
format, please email
ContactUs@eastcambs.gov.uk

Dear Ms Terry,

Re: Scoping Opinion: Application by National Grid Electricity Transmission plc (the Applicant) for an Order granting Development Consent for the Proposed Grimsby to Walpole Project (the Proposed Development)

Thank you for your letter dated 6 August 2024 inviting the opportunity to inform the Scoping Opinion.

I have undertaken a desk top assessment of the proposal and presumed all the relevant consultations have been undertaken.

On behalf of East Cambridgeshire District Council, I can confirm that we do not have any comments to make. This is on the basis that it appears as though no development works are required within or adjacent to our District.

If this situation changes, and it transpires that work are required within the East Cambridgeshire District, please inform us.

Yours sincerely

[REDACTED]

Gemma Driver
Senior Planning Officer

The Hub, Mareham Road, Horncastle, Lincolnshire. LN9 6PH
T: 01507 601111
www.e-lindsey.gov.uk

The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Sent 30th August 2024 via email to:

grimsbytowalpole@planninginspectorate.gov.uk.

Our Ref: 1190/24

Planning Inspectorate Ref:

Contact: Sam Dewar

Ext: 01507 601111

Email: Dev.Control@e-lindsey.gov.uk

Date: 30th August 2024

APPLICANT:	National Grid Electricity Transmission PLC
PROPOSAL:	Statutory Scoping Consultation to East Lindsey District Council under Section 42 of the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (10 and 11) prior to the submission of an application for an Order granting Development Consent for the proposed Grimsby to Walpole Project.
LOCATION:	Grimsby to Walpole

Thank you for your recent consultation in relation to the above. Sam Dewar of Dewar Planning Associates has been instructed to act as lead officer on behalf of the three Local Planning Authorities consulted (Boston Borough Council, South Holland District Council and East Lindsey District Council).

An individual response will be provided on behalf of each Local Planning Authority (LPA) detailing how the development within their authority boundary impacts them.

Introduction

By way of an introduction, I am a chartered member of the RTPI and act as Director and founder of Dewar Planning. I have previously worked as planning officer through to head of planning at local planning authorities and have since formed my own private planning practice submitting applications to over 100 local planning authorities across the UK. These applications have ranged from large wind farms to residential schemes, and various small to major scale commercial developments. We also continue to provide bespoke consultancy assistance for local planning authorities due to the positive relationships we have developed.

The Applicant 'National Grid Electricity Transmission' intends to submit an application for Development Consent Order under Section 37 of the Planning Act 2008, comprising details of the proposed Grimsby to Walpole development, with an Environmental Statement in line with Regulation 14 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 as well as the other relevant policies and legislations.

List of Consultees

Each LPA are a consultee as part of duty to consult (section 42 of the Planning Act 2008). Responses were sought internally from department officers and Councillors and externally to Parish Councils and Town Councils. In some cases, consultations were received outside of these bodies and are included for completeness. All consultees have the ability to respond directly to the applicant as part of this process however we have presented any responses received. The list below is the list of consultations sought by the council. Later in this report if any other representations were received, they will also be included however will be shown as being external to demonstrate that these are not necessarily the views of the Council:

Internal

1. Principal Policy Officer (Strategic Planning)
2. Environmental Health
3. Street Scene
4. Senior Ecologist
5. Mrs. L. Kidd, Clerk to the Firsby Group Parish Council
6. Mrs. J. Cooper, Clerk to Willoughby with Sloothby Parish Council
7. Mr. S. J. Fletcher, Clerk to the Mablethorpe & Sutton Town Council
8. Ms. R. Kendrick, Clerk to Langrville Parish Council
9. Ms. S. L. Kulwiki, Clerk to Thornton Le Fen Parish Council
10. Mrs. S. L. Knowles, Clerk to Frithville Parish Council
11. Mrs. S. L. Knowles, Clerk to Westville Parish Council
12. Mrs. V. Clark, Clerk to Carrington and New Bolingbroke Town Council
13. Mrs. S. Knowles, Clerk to Sibsey Parish Council
14. Mrs. E. Arnold, Clerk to New Leake Parish Council
15. Mr. J. Howlett, Vice Chairman to Stickford Parish Council
16. Mrs. S. Knowles, Clerk to Toynton St. Peter Parish Council
17. Mrs. J. Cooper, Clerk to Welton Le Marsh Parish Council
18. Ms. J. Hart, Clerk to Orby Parish Council
19. Ms. K. Hayes, Clerk to Hogsthorpe Parish Council
20. Mr. P. Bradshaw, Beesby with Saleby Parish
21. Mr. E. Cook, Clerk to Strubby with Woodthorpe Parish
22. Ms. S. Kennett, Clerk to Withern with Stain Parish Council

23. Mr. A. Vassar, Clerk to Anderby Parish Council
24. Ms. S. Bristow, Clerk to Theddlethorpe All Saints Parish Council
25. Mrs. E.L. Arnold, Clerk to Stickney Parish Council
26. Mrs. L. Kidd, Clerk to the Firsby Group Parish Council
27. Mrs. D. Dobson, Chairman to Candlesby & Gunby Parish
28. Mrs. M. Lillywhite, Clerk to Cumberworth Parish
29. Ms. K. Culley, Clerk to Bilsby, Asserby & Thurlby Parish
30. Mrs. L. Kidd, Clerk to the Firsby Group Parish Council
31. Cllr. S. Devereux & Cllr. G. Marsh Acting on behalf of Markby Parish
32. J. Cooper, Clerk to Mumby Parish Council
33. Mr. M. Rudd, Clerk to Huttoft Parish Council
34. Cllr. Acting on behalf of Hannah cum Hagnaby Parish
35. Mr. G. Simpson, Clerk to Maltby Le Marsh Parish
36. Ms. S. Bristow, Clerk to Theddlethorpe St. Helen Parish
37. Cllr. S.C. Devereux
38. Cllr. G.A. Marsh
39. Cllr. T. Ashton
40. Cllr. N. Jones
41. Cllr. T. Taylor
42. Cllr. C. Dickinson
43. Cllr. S. Eyre
44. Cllr. R. Dawson
45. S. Evans
46. Cllr, C. Arnold
47. Cllr. G. E. Cullen
48. Cllr. K. Marnoch
49. Cllr. S. Bristow
50. Cllr. R. Watson
51. Mrs. J. Cooper
52. Ms. H. McKinley
53. Ms. P. Murray, Clerk to Saltfleetby Parish Council

External

54. Environment Agency
55. Natural England
56. Heritage Lincolnshire
57. Historic England
58. Health & Safety Executive
59. Cadent Gas Ltd, National Grid Plant Protection
60. National Gas
61. Highways and SuDS Support
62. The Gardens Trust
63. Steffie Shields, Lincolnshire Gardens Trust
64. Lincolnshire Wildlife Trust
65. Joint Committee of the National Amenity Societies
66. NATS LTD. Safeguarding Office
67. Internal Drainage Board
68. Witham Fourth District Internal Drainage Board

Proposed Development within East Lindsey

The Project is of national significance as it comprises a new electricity line above ground, with a total length of approximately 140 kilometres. The proposed new above ground line would start from a new substation west of Grimsby town and ending at 140km south, at a new substation west of the village of Walpole St Andrew.

The proposed development is deemed necessary to support the connection of new generation projects in Scotland and the north-east of England in the next decade and beyond. National Grid identified that the existing transmission system would not be sufficient to meet connection demand going forward. Without additional network capability, offshore wind and interconnectors will be constrained at times of high wind generations and high imports. The operation of the network would become sub-optimal in the long term, less efficient, and more carbon intensive sources of generation would potentially be used at those times, hindering progress towards net zero.

The principal elements of the project include:

- Approximately 140 km of new 400 kV overhead transmission line (OHL).
- A new 400 kV substation to be built in the vicinity of the existing Grimsby West 400 kV Substation in North East Lincolnshire (to be referred to as Grimsby West Substation). The existing substation will be decommissioned, in all, or part.

- Two new 400 kV Lincolnshire Connection substations located south-west of Mablethorpe in East Lindsey (to be referred to as Lincolnshire Connection Substation A and Lincolnshire Connection Substation B).
- A new 400 kV substation in the vicinity of the Spalding Tee-Point in South Holland District (to be referred to as Weston Marsh Substation).
- A new 400 kV substation in proximity to the existing Walpole Substation west of the village of Walpole St Andrew and north of the town of Wisbech, in King's Lynn and West Norfolk District (herein after referred to as Walpole B Substation).
- Replacement of short sections of existing 400 kV OHL and local changes to the lower voltage distribution networks to facilitate the construction of the new OHL and substations.

The final design and scale of each component of the proposed development is yet to be confirmed, however as explained within Chapter 4.7 of the Environmental Impact Scoping Report (Volume 1) the following information is relevant:

- Overhead lines comprise of conductors supported by pylon is approximately 50 metres tall but can be up to 60 metres. The distance between pylons is typically 350 metres (3 pylons per kilometre of line).
- The exact type of substation to be used at the five proposed locations is to be confirmed, however, assuming all use air insulated methods the scales are as follows (note that no heights have been seen in the information provided but it is expected these buildings will be between 20m and 30m tall):
 - Grimsby West: 600m x 200m
 - LCS-A and LCS-B 700m x 200m each
 - Weston Marsh: 700m x 200m
 - Walpole B: 800m x 200m

At this stage it is noted that the presented Scoping Boundary is based on the emerging preferred corridor, with the exact alignment of the project including construction compounds and haul roads are yet to be confirmed. The Scoping Boundary covers the maximum extent of where infrastructure could be located and will be refined as the development moves through further technical studies and surveys as well as feedback through both stakeholder engagement and non-statutory and statutory consultations.

Within East Lindsey, the relevant works for review include overhead lines suspended between pylons in sections 2,3 and 4 as well as substation works within section 3 as detailed below in Figure 1.1.

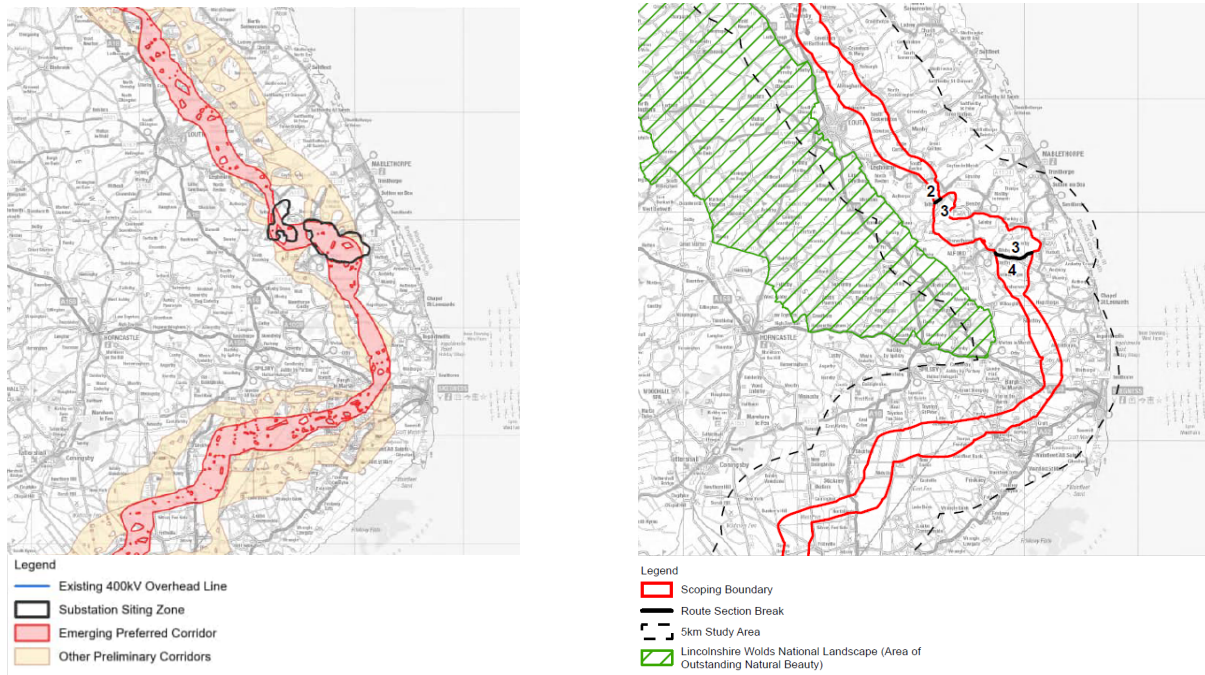


Figure 1.1 : Extracts from Figure 3.9 (left) and Figure 6.1 (right) showing the proposed substation areas (black outlines) and overall scoping area within East Lindsey District Council from EN020036-000017-GWPL - Scoping Report Volume 3 Figures Part A - Figures 1.1 to 8.4.

Planning Policy

Whilst the Applicant is seeking permission for the proposals directly from the Secretary of State for a DCO under section 37 of the Planning Act 2008, there are still a number of local and national planning policies which are considered relevant and should be taken account of as part of the development process. These plans and local knowledge have been formed over several years and have come from a significant evidence base.

The Local Plan for East Lindsey comprises the Core Strategy 2018 and the Settlement Proposals Document 2018. The relevant objectives and policies within the East Lindsey Local Plan are:

- Vision and Objective 1 - Seeks a network of thriving, safer and healthy sustainable communities, where people can enjoy a high quality of life and an increased sense of well-being and where new development simultaneously addresses the needs of the economy, communities and the environment.
- Vision and Objective 3 - Seeks a growing and diversified economy that not only builds on and extends the important agriculture and tourism base but supports the creation of all types of employment.
- Vision and Objective 6 - Seeks a commitment to tackling the causes and effects of global climate change through local action.
- Vision and Objectives Para 1.11 - Seeks to achieve the vision of a commitment to tackling the causes and effects of global climate change through local action, Support is provided for new development to ensure it does not cause

flood risk to existing properties and encourage new development to reduce flood risk to existing properties.

- Vision and Objectives Para 1.11 - Supports the use of renewable energy but balanced against the protection of the District's distinct landscapes.
- Strategic policy 10 (SP10) – Design - Development around water sources will only be supported if it contains adequate protection preventing pollution from entering into the water source.
- Strategic policy 11 (SP11) – Historic Environment - The Council will support proposals that secure the continued protection and enhancement of heritage assets in East Lindsey, contribute to the wider vitality and regeneration of the areas in which they are located and reinforce a strong sense of place.
- Strategic policy 13 (SP13) – Inland Employment - The Council will support growth and diversification of the local economy by: Strengthening the rural economy by supporting in the large, medium and small villages: Development where it can provide local employment.
- Strategic policy 16 (SP16) – Inland Flood Risk - The Council will support development that demonstrates an integrated approach to sustainable drainage that has positive gains to the natural environment. The Council will support development for business, leisure and commercial uses in areas of inland flood risk where it can be demonstrated that accommodating the development on a sequentially safer site would undermine the overall commercial integrity of the existing area. Such developments must incorporate flood mitigation measures in their design.
- Strategic policy 17 (SP17) – Coastal East Lindsey - All relevant development will need to provide adequate flood mitigation. The council will support improvements to flood defences, infrastructure associated with emergency planning and the development and replacement community buildings. Development must also demonstrate that it satisfies the Sequential and Exception Test and will need to provide adequate flood mitigation.
- Strategic policy 21 (SP21) – Coastal Employment - The Council will support the rural coastal economy by supporting development in the large, medium and small villages where it: Provides local employment and help support local services.
- Strategic policy 23 (SP23) – Landscape - The District's landscapes will be protected, enhanced, used and managed to provide an attractive and healthy working and living environment. Development will be guided by the District's Landscape Character Assessment and landscapes defined as highly sensitive will be afforded the greatest protection.
- Strategic Policy 24 (SP24) - Biodiversity and Geodiversity - Development proposals should seek to protect and enhance the biodiversity and geodiversity value of land and buildings and minimise fragmentation and maximise opportunities for connection between natural habitats.

- Strategic Policy 25 (SP25) – Green Infrastructure - In the case of sites not identified on the Inset Maps, development will only be permitted on open spaces provided unacceptable harm will not be caused to their appearance, character or role.
- Strategic Policy 27 (SP27) – Renewable and Low Carbon Energy Large-scale renewable and low carbon energy development, development for the transmission and interconnection of electricity, and infrastructure required to support such development, will be supported where their individual or cumulative impact is, when weighed against the benefits, considered to be acceptable in relation to:
 - o residential amenity;
 - o surrounding landscape, townscape and historic landscape character, and visual qualities;
 - o the significance (including the setting) of a historic garden, park, battlefield, building, conservation area, archaeological site or other heritage asset;
 - o sites or features of biodiversity or geodiversity importance, or protected species;
 - o the local economy;
 - o highway safety; and
 - o water environment and water quality
- Strategic Policy 28 (SP28) – Infrastructure and S106 Obligations - Infrastructure schemes will be supported provided they are essential in the national interest; contribute to sustainable development, and respect the distinctive character of the district.

The NPPF was originally implemented in 2012, with the most recent revision being 2019 and an update in 2023. The NPPF sets out the UK Government’s planning policies for England and how these are expected to be applied.

The NPPF does not contain specific policies for NSIPs (for which particular considerations apply, determined in accordance with the decision-making framework set out in the Planning Act 2008 and relevant NPSs) but may be considered as a relevant consideration as below.

- Paragraph 123 - Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land⁴⁷.

Footnote 49 of the NPPF states:

Except where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity.

- Paragraph 124 - Planning policies and decisions should:
 - encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;
 - recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;
 - give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
 - promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and
 - support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.

- Paragraph 157 - The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

- Paragraph 165 - Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

- Paragraph 180 - Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and;
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Representations Received

Each LPA are a consultee as part of duty to consult (section 42 of the Planning Act 2008). Responses were sought internally from department officers, Parish Councils, Town Councils and Councillors. All consultees have the ability to respond directly to the applicant as part of this process however we have presented any responses received.

East Lindsey District Council does not have in house specialists or advisers for all topic areas relevant to this response, therefore the below list of representations sets out the comments and advice received from internal consultees as well as external consultants employed by the Council. Where no comments have been received and no external consultant employed, this response will seek to comment generally on the topic areas where appropriate, however it is acknowledged that comments may be sent directly by the County Council and these will be endorsed by the Council, as a two-tier planning authority.

As the Council do not have a Landscape Officer, an external company was sought to respond on behalf of the Council, Terra Loci, who are Landscape Architects and specialise in Landscape Planning.

The comments received from consultees are summarised as follows. Please note that for transparency the wording of each response is as it has been received as it is important that these are taken into account by the Applicant in their entirety. Please also note that due to time constraints to respond some have chosen to respond to this NSIP and the other for the Grimsby to Wapole link which we appreciate is subject to another scoping process. There is some cross over but this should be self-explanatory on the responses received:

Internal

Terra Loci Landscape Architects - acting on behalf of the Council – summarised and elaborated upon within main body of this statement

- Representative viewpoints must be submitted and approved prior to the assessment being undertaken
- ZTV analysis should also include a bare-earth scenario to show the potential worst-case
- It is unclear from the Landscape / Visual methodologies how results of ZTV analysis will be presented
- ZTV analysis should also be undertaken for the maximum foreseeable parameters of development within substation compounds
- Locations for representative viewpoints should be submitted for approval along with the type of visualisation proposed and appropriate justification for the visualisation type
- The LVIA should consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics. The EIA process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit
- Cumulative schemes to be included within cumulative assessment should be submitted prior to undertaking assessment.

Cllr Robert Watson - Green Party District and Town Councillor for Sutton-on-Sea

I feel that the items below should be included and investigated in any environmental impact assessment for the project concerned:

- Assess the impact of the project on cultural resources and historic properties.
- Assess the potential impact of the project on the availability of natural resources such as water and soil.
- Evaluate the impact of the project on local ecosystems and biodiversity.
- Assess the potential impact of the project on public health and safety.
- Evaluate the project's potential environmental impacts on air quality, water quality, wildlife, and plants.
- Assess the impact of the project on the health and well-being of the local population.
- Assess the impact of the project on the tourism through the area.
- Evaluate the impact on the aesthetic appeal of the area.

External

Witham Fourth District Internal Drainage Board

Witham Fourth District IDB and its officers are aware of the above project and have had some initial conversations with Carl Simms of National Grid but, are yet to sit down and discuss specific details regarding the proposed route and IDB asset interfaces.

The current route of the proposed National Infrastructure project has a significant impact on the Board's maintained watercourse and operations. At this early stage we do not have a definitive route and design so our comments will be generalised to cover the expected implication. We expect to see the Land Drainage Act disestablished, but the necessary provisions will be catered for in a Protected Provisions in the DCO, which will be agreed with the Board, and we look forward to conversations with National Grid to minimise the impact on the Board and its operations.

1. There are several Board maintained watercourses that exist within the boundary of the proposed works and to which BYELAWS and the LAND DRAINAGE ACT applies:

No person may erect any building or structure (including walls and fences), whether temporary or permanent, or plant any tree, shrub, willow, or other similar growth within 9 metres of the top edge of the watercourse/edge of the culvert without the prior consent of the Board.

Please note the Board will not consent any permanent or temporary construction within the 9 metres BYELAW easement. Please refer to the Board's Nine Metre Easement Policy for further information: <https://www.w4idb.co.uk/resources/document-library/consent-forms-and-guidance/>

Where any proposed cables are to be directionally drilled beneath a watercourse, consent will be required and must be at agreed depths. More detail on this can be supplied and should be discussed in further detail.

3. There are several Riparian watercourses that exist within the boundary of the proposed works and to which the Land Drainage Act applies:

Under the terms of the Land Drainage Act 1991, the prior written consent of the Board is required for any proposed temporary or permanent works or structures within any watercourse including infilling or a diversion.

4. Board's Byelaw consent is required to directly discharge surface water to a watercourse (open or piped). A surface water development contribution (SWDC) will be charged on all rates of discharges. Please refer to the Board's Development & Consent Control Guidance for more information: <https://www.w4idb.co.uk/resources/document-library/consent-forms-and-guidance/>

5. The Board does not fully support the use of subbase reservoirs and questions their suitability as an effective long term SUDS solution.

6. Board's Byelaw consent is required to discharge treated water to a watercourse (open or piped).

7. Board's Section 23 consent is required to culvert, pipe, or bridge any watercourse riparian or Board maintained.

8. The suitability of new soakaways, as a means of surface water disposal, should be to an appropriate standard and to the satisfaction of the Approving Authority in conjunction with the Local Planning Authority. If the suitability is not proven the Applicant should be requested to re-submit amended proposals showing how the Site is to be drained. Should this be necessary this Board would wish to be re-consulted.

9. A permanent undeveloped strip of sufficient width should be made available adjacent to the top of the bank of all watercourses on Site to allow future maintenance works to be undertaken.

Suitable access arrangements to this strip should also be agreed. Access should be agreed with the Local Planning Authority, Lincolnshire County Council and the third party that will be responsible for the maintenance in consultation with the Internal Drainage Board where a watercourse is subject to Byelaws.

10. All drainage routes through the Site should be maintained both during the works on Site and after completion of the works. Provisions should be made to ensure that upstream and downstream riparian owners and those areas that are presently served by any drainage routes passing through or adjacent to the Site are not adversely affected by the development. Drainage routes shall include all methods by which water may be transferred through the Site and shall include such systems as "ridge and furrow" and "overland flows". The effect of raising Site levels on adjacent property must be carefully considered and measures taken to negate influences must be approved by the Local Planning Authority.

Consideration must be given to the route of flow downstream of the site from the discharge point to an appropriately maintained watercourse. Are there any off site works or the need for increased maintenance required to safeguard the site discharge for the life of the development.

12. SUDS/drainage response sent to LCC.

Thornton Le Fen Parish Council

Objects to all overground development on grade 1 agricultural land. Reasons - irrevocable damage/disruption to-Food security. Destruction of irreplaceable Grade 1 Agricultural Land. Delicate infrastructure unable to cope with current heavy vehicles. RAF flight paths. National Security. Easy terrorist targets. Detrimental to Tourism. Destroying a unique landscape and AONBs. Compensation for Property prices. Toll on mental health. Physical issues such as cancer clusters. Noise from Pylons. Destruction of wildlife...owks, bats, newts, hedgehogs,hares. Disruption of the bird migration super highway. Inflicting outdated technology to maximise profit for a private company. We support an integrated off shore grid.

Mablethorpe & Sutton Town Council

That the Town Council reiterates its support for the statements made by ELDC and LCC in respect of proposed Pylons in Lincolnshire, and firmly objects to any scoping proposals in this regard.

Huttoft Parish Council

Below is an abridged version of the Councils response directly to the Planning Inspectorate: Huttoft Parish Council strongly opposes the current proposals as set out in the EIA Scoping Report.

Residents have provided a huge amount of feedback to Councillors opposing the current plans, with concerns regarding the potential negative impacts on the local community: its residents, infrastructure, businesses, tourism and agriculture. The plans to industrialise the countryside and build large overground pylons stretching across the county, will have a significant negative impact on areas in and around the Lincolnshire Wolds and in the local area.

Huttoft has little local industry and relies heavily on tourism and agriculture. The Council believes the construction of a huge substation near Alford will severely impact the local community. Local organisations, heavily reliant on tourism such as Lincolnshire Coastal Park, NT Sandilands, Huttoft Car Terrace, a number of animal sanctuaries and the local public house, will all be negatively impacted by any fall in visitor numbers. The lost or damage to

agricultural land across Lincolnshire also has the potential to negatively impact local food production. This will be exacerbated by many months of huge construction vehicles and machinery using the roads in and around the proposed site, that are totally unsuitable for heavy construction vehicles, the inevitable long term disruption to residents, damage to roads, increased local traffic disruption, increased noise levels, increased pollution and damage to local wildlife and biodiversity.

Residents have already had to endure many years of disruption from previous schemes that have caused disruption to the local community. The Council believes the current proposals have been

made for commercial purposes and not enough consideration has been given to minimising the impact of the local environment; especially the proposed pylons, which could be sited underground.

Great Steeping Parish Council

Agree wholeheartedly with the comments submitted by the Bratoft & Little Steeping Parish Councillors.

Firsby Group Parish Council

National Grid have not provided an option to upgrade any existing pylon links i.e. from either High Mareham / Cottam to Walpole. Wouldnt a more cost effective option have been to strengthen the existing pylons and add cables which would be less disruptive as the pylons and substations are already in place?

Bilbsby and Farlesthorse Parish

The Parish Council have asked me to respond to you as they will to the two national scoping opinions they have been asked to provide, both in relation to this project and the Grimsby to Walpole project.

The switching and converter stations which is proposed to be built at Asserby in the Bilbsby Parish area, will have a direct and negative impact upon our parish and parishioners.

The people in our parish have grave concerns about the industrialisation of the countryside by both the pylons and switching and converter buildings which are proposed. The footprint of these buildings is estimated to be 100,000 sq. metres for the switching station and 20,000 sq. metres for the converter station. Both buildings are proposed to be up to 30m tall, The area these are planned for, is flat and the vista's both to the coast and inland to the Wolds area, an Area of Outstanding Natural Beauty (AONB) would be severely blighted, and have a detrimental effect on the areas two main forms of income and employment, namely the farming sector, which generates £1.3billion across the county and the tourism industry is worth £824m. The Parish Council firmly believe the country's No.1 priority should be food production. That seems to have been sacrificed on the altar of biodiversity. The amount of top-quality land being lost to food production would have a detrimental effect on Britain striving to become more self-sufficient in feeding itself. It would increase the amount of food needed to be imported and inevitably increase the field to fork mileage and increase our nation's carbon output when we should be doing everything to reduce this to achieve the governments net zero goal.

Bilbsby & Farlesthorse Parish Council would therefore like to see included with any application, compliance with regulation 5(2) of the EIA Regulations as set out below:

(2) The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors-

- (a) population and human health;
- (b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC(14) and Directive 2009/147/EC(15);
- (c) land, soil, water, air and climate;
- (d) material assets, cultural heritage and the landscape;
- (e) the interaction between the factors referred to in sub-paragraphs (a) to (d).

(3) The effects referred to in paragraph (2) on the factors set out in that paragraph must include the operational effects of the proposed development, where the proposed development will have operational effects.

(4) The significant effects to be identified, described and assessed under paragraph (2) include, where relevant, the expected significant effects arising from the vulnerability of the proposed development to major accidents or disasters that are relevant to that development.

(5) The Secretary of State or relevant authority, as the case may be, must ensure that they have, or have access as necessary to, sufficient expertise to examine the environmental statement or updated environmental statement, as appropriate.

In addition, details should be included which specifically identify and include:

1. Impact on the loss of agricultural land currently important in helping the UK in its food security measures.
2. Comprehensive study and report on the impact such development will have on the tourist industry. In particular, the erection of the interconnector and substations along the main route to the coast and the visual impact from the Wolds Area of Outstanding Natural Beauty.
3. A survey of all local roads and impact thereon in terms of construction traffic both within the parishes affected and along the major routes to be used to access the site(s)
4. A comprehensive and extensive bat survey for the proposed route and the proposed interconnector sites.
5. A comprehensive wildlife habitat and species survey for the proposed route and the interconnector sites and up to 10 metres outside the range of the application site(s), together with mitigation measures to protect all wildlife species in the area including flora and fauna.
6. Impact Assessment on existing underground infrastructure.
7. The cost of repairing the damage caused by heavy vehicles during the construction stages to the road infrastructure, which will probably last years.
8. Calculations for compensation payable to local people whose properties would be blighted or the businesses who would see a substantial drop in their ability to maintain a viable income.
9. The disruption which will undoubtedly be caused to local residences including, disruption to daily activities, light and dust pollution,
10. Impact on local medical and mental health and access to emerge
11. Impact on existing infrastructure including damage/pollution to water courses, broad band and telephone disruption due to pylons.

The parish council and the majority of people in our parish would prefer the cabling to continue under the sea and come onshore further south, (in line with National Grid "Beyond 2030 Report). This would negate the need to build the switching and converter stations.

We would urge decision makers to consider all the relevant points and come to the conclusion that the alternative option to build an offshore integrated grid would completely remove the need to destroy prestige countryside by taking the cabling further south where the power is required.

Elkington Parish Council

Very concerned at the impact these proposals will have on the area, in terms of visual intrusion; wildlife; loss of agricultural land and impact on tourism and economy.

To that end the Elkington Parish Council would like to see included with any application:

Compliance with regulation 5(2) of the EIA Regulations to ensure that -

(2) The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors-

(a) population and human health;

(b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC(14) and Directive 2009/147/EC(15);

(c) land, soil, water, air and climate;

(d) material assets, cultural heritage and the landscape;

(e) the interaction between the factors referred to in sub-paragraphs (a) to (d).

(3) The effects referred to in paragraph (2) on the factors set out in that paragraph must include the operational effects of the proposed development, where the proposed development will have operational effects.

(4) The significant effects to be identified, described and assessed under paragraph (2) include, where relevant, the expected significant effects arising from the vulnerability of the proposed development to major accidents or disasters that are relevant to that development.

(5) The Secretary of State or relevant authority, as the case may be, must ensure that they have,

or have access as necessary to, sufficient expertise to examine the environmental statement or updated environmental statement, as appropriate

In addition details should be included which specifically identify and include:

1. A comprehensive and extensive bat survey for the proposed route and the proposed interconnector sites

2. A comprehensive wildlife habitat and species survey for the proposed route and the interconnector sites and up to 10 metres outside the range of the application site(s), together with mitigation measures to protect all wildlife species in the area including flora and fauna.

3. A survey of all local roads and impact thereon in terms of construction traffic both within the parishes affected and along the major routes to be used to access the site(s)

4. Impact Assessment on existing underground infrastructure.

5. Comprehensive study and report on the impact such development will have on the tourist industry, in particular the erection of the interconnector and substations along the main route to the coast and the visual impact from the Wolds Area of Outstanding Natural Beauty.

6. Impact on the loss of agricultural land currently important in helping the UK in its food security measures.

Stickford Parish Council

Strongly opposes and objects to the proposed pylons in Lincolnshire the subject of National Grid's upgrade proposal to construct 87 miles of new overhead transmission lines on 150 feet high pylons including substations from Grimsby to Walpole in Cambridgeshire.

The Parish Council has previously submitted its comments and objections directly to National Grid in March 2024 as part of the initial consultation process. Many residents of Stickford village also submitted their comments and objections.

The Parish Council supports the comments made by East Lindsey District Council in the statement of the South and East Lincolnshire Partnership Leaders joint statement, Lincolnshire County Council in a statement dated 6th March 2024 and the Lincolnshire Police and Crime Commissioner's statement dated 12th March 2024.

We would ask that the current proposals are totally reconsidered in favour of offshore and/or underground options. We understand that in other parts of the UK and also in other countries offshore options are being pursued to avoid impact on rural areas. Indeed we understand that approval has recently been given to an offshore scheme from Scotland to the north of England which is linked to this proposal.

We have previously accommodated the construction of underground power lines with the Triton Knoll and Viking Link projects causing disturbance and inconvenience to our farmlands and countryside during construction and now they have gone having reinstated the land but the pylons will be a permanent eyesore. The proposals from National Grid will bring further disturbance. We would have to endure many months of construction with large vehicles and machinery using the current road infrastructure which is totally inappropriate for such use and which will also cause significant noise and pollution. Further the proposals will have a serious impact on the Lincolnshire landscape, natural environment, tourism, farming, wildlife and natural habitats together also with the quality of life for residents and visitors.

Our county of Lincolnshire is made up of rolling, beautiful and presently unspoilt countryside, extensive farmlands which provide a significant amount of the country's food supply, historic towns and villages and coastal resorts which we would not like to see spoilt by the giant and noisy pylons, electricity lines and substation sites. The pylons, large substations, switching and converter buildings will look totally unsightly on flat land from countryside to coastal views. Our county benefits greatly from the tourism industry with visitors flocking to our countryside and coast and our agricultural heritage which we would not want to be prejudiced by the proposals. An underground transmission route or an offshore scheme would be better options. In addition to this proposal there are also a number of solar farm proposals which either have been approved or are being considered for land in Lincolnshire. It is appreciated that more environmentally friendly energy sources need to be found but not at the expense of our county with the loss of valuable farming land and the effect on our countryside, environment and tourism industry. It would appear that the Secretary of State will make the final decision as the proposal is being classed as a nationally significant infrastructure project. All we ask is that the strength, volume and detail of all of the objections and comments on this proposal are fully considered.

Swaby Group Parish Council

Very concerned at the impact these proposals will have on the area, in terms of visual intrusion; wildlife; loss of agricultural land and impact on tourism and economy.

To that end the Swaby Group Parish Council would like to see included with any application:

Compliance with regulation 5(2) of the EIA Regulations to ensure that -

(2) The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors—

- (a) population and human health;
 - (b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC(14) and Directive 2009/147/EC(15);
 - (c) land, soil, water, air and climate;
 - (d) material assets, cultural heritage and the landscape;
 - (e) the interaction between the factors referred to in sub-paragraphs (a) to (d).
- (3) The effects referred to in paragraph (2) on the factors set out in that paragraph must include the operational effects of the proposed development, where the proposed development will have operational effects.
- (4) The significant effects to be identified, described and assessed under paragraph (2) include, where relevant, the expected significant effects arising from the vulnerability of the proposed development to major accidents or disasters that are relevant to that development.
- (5) The Secretary of State or relevant authority, as the case may be, must ensure that they have, or have access as necessary to, sufficient expertise to examine the environmental statement or updated environmental statement, as appropriate

In addition details should be included which specifically identify and include:

1. A comprehensive and extensive bat survey for the proposed route and the proposed interconnector sites
2. A comprehensive wildlife habitat and species survey for the proposed route and the interconnector sites and up to 10 metres outside the range of the application site(s), together with mitigation measures to protect all wildlife species in the area including flora and fauna.
3. A survey of all local roads and impact thereon in terms of construction traffic both within the parishes affected and along the major routes to be used to access the site(s)
4. Impact Assessment on existing underground infrastructure.
5. Comprehensive study and report on the impact such development will have on the tourist industry, in particular the erection of the interconnector and substations along the main route to the coast and the visual impact from the Wolds Area of Outstanding Natural Beauty.
6. Impact on the loss of agricultural land currently important in helping the UK in its food security measures.

Welton le Marsh Parish Council

Very concerned at the impact these proposals will have on the area, in terms of visual intrusion; wildlife; loss of agricultural land and impact on tourism and economy.

To that end the Welton le Marsh Parish Council would like to see included with any application:

Compliance with regulation 5(2) of the EIA Regulations to ensure that -

- (2) The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors—
- (a) population and human health;
 - (b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC(14) and Directive 2009/147/EC(15);
 - (c) land, soil, water, air and climate;
 - (d) material assets, cultural heritage and the landscape;
 - (e) the interaction between the factors referred to in sub-paragraphs (a) to (d).

(3) The effects referred to in paragraph (2) on the factors set out in that paragraph must include the operational effects of the proposed development, where the proposed development will have operational effects.

(4) The significant effects to be identified, described and assessed under paragraph (2) include, where relevant, the expected significant effects arising from the vulnerability of the proposed development to major accidents or disasters that are relevant to that development.

(5) The Secretary of State or relevant authority, as the case may be, must ensure that they have, or have access as necessary to, sufficient expertise to examine the environmental statement or updated environmental statement, as appropriate

In addition details should be included which specifically identify and include:

1. A comprehensive and extensive bat survey for the proposed route and the proposed interconnector sites

2. A comprehensive wildlife habitat and species survey for the proposed route and the interconnector sites and up to 10 metres outside the range of the application site(s), together with mitigation measures to protect all wildlife species in the area including flora and fauna.

3. A survey of all local roads and impact thereon in terms of construction traffic both within the parishes affected and along the major routes to be used to access the site(s)

4. Impact Assessment on existing underground infrastructure.

5. Comprehensive study and report on the impact such development will have on the tourist industry, in particular the erection of the interconnector and substations along the main route to the coast and the visual impact from the Wolds Area of Outstanding Natural Beauty.

6. Impact on the loss of agricultural land currently important in helping the UK in its food security measures.

Willoughby District Parish Council

Compliance with regulation 5(2) of the EIA Regulations to ensure that -

(2) The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors—

(a) population and human health;

(b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC(14) and Directive 2009/147/EC(15);

(c) land, soil, water, air and climate;

(d) material assets, cultural heritage and the landscape;

(e) the interaction between the factors referred to in sub-paragraphs (a) to (d).

(3) The effects referred to in paragraph (2) on the factors set out in that paragraph must include the operational effects of the proposed development, where the proposed development will have operational effects.

(4) The significant effects to be identified, described and assessed under paragraph (2) include, where relevant, the expected significant effects arising from the vulnerability of the proposed development to major accidents or disasters that are relevant to that development.

(5) The Secretary of State or relevant authority, as the case may be, must ensure that they have, or have access as necessary to, sufficient expertise to examine the environmental statement or updated environmental statement, as appropriate

In addition details should be included which specifically identify and include:

1. A comprehensive and extensive bat survey for the proposed route and the proposed interconnector sites
2. A comprehensive wildlife habitat and species survey for the proposed route and the interconnector sites and up to 10 metres outside the range of the application site(s), together with mitigation measures to protect all wildlife species in the area including flora and fauna.
3. A survey of all local roads and impact thereon in terms of construction traffic both within the parishes affected and along the major routes to be used to access the site(s)
4. Impact Assessment on existing underground infrastructure.
5. Comprehensive study and report on the impact such development will have on the tourist industry, in particular the erection of the interconnector and substations along the main route to the coast and the visual impact from the Wolds Area of Outstanding Natural Beauty.
6. Impact on the loss of agricultural land currently important in helping the UK in its food security measures.

Mumby Parish Council

Very concerned at the impact these proposals will have on the area, in terms of visual intrusion; wildlife; loss of agricultural land and impact on tourism and economy.

To that end the Mumby Parish Council would like to see included with any application:

Compliance with regulation 5(2) of the EIA Regulations to ensure that -

(2) The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors—

- (a) population and human health;
- (b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC(14) and Directive 2009/147/EC(15);
- (c) land, soil, water, air and climate;
- (d) material assets, cultural heritage and the landscape;
- (e) the interaction between the factors referred to in sub-paragraphs (a) to (d).

(3) The effects referred to in paragraph (2) on the factors set out in that paragraph must include the operational effects of the proposed development, where the proposed development will have operational effects.

(4) The significant effects to be identified, described and assessed under paragraph (2) include, where relevant, the expected significant effects arising from the vulnerability of the proposed development to major accidents or disasters that are relevant to that development.

(5) The Secretary of State or relevant authority, as the case may be, must ensure that they have, or have access as necessary to, sufficient expertise to examine the environmental statement or updated environmental statement, as appropriate

In addition details should be included which specifically identify and include:

1. A comprehensive and extensive bat survey for the proposed route and the proposed interconnector sites
2. A comprehensive wildlife habitat and species survey for the proposed route and the interconnector sites and up to 10 metres outside the range of the application site(s), together with mitigation measures to protect all wildlife species in the area including flora and fauna.

3. A survey of all local roads and impact thereon in terms of construction traffic both within the parishes affected and along the major routes to be used to access the site(s)
4. Impact Assessment on existing underground infrastructure.
5. Comprehensive study and report on the impact such development will have on the tourist industry, in particular the erection of the interconnector and substations along the main route to the coast and the visual impact from the Wolds Area of Outstanding Natural Beauty.
6. Impact on the loss of agricultural land currently important in helping the UK in its food security measures.

Neighbour objection

The switching and converter stations which is proposed to be built at Asserby in the Bilbsy Parish area, will have a direct and negative impact upon our parish and parishioners.

The people in our parish have grave concerns about the industrialisation of the countryside by both the pylons and switching and converter buildings which are proposed. The footprint of these buildings is estimated to be 100,000 sq. metres for the switching station and 20,000 sq. metres for the converter station. Both buildings are proposed to be up to 30m tall, The area these are planned for, is flat and the vistas both to the coast and inland to the Wolds area, an Area of Outstanding Natural Beauty (AONB) would be severely blighted, and have a detrimental effect on the area's two main forms of income and employment, namely the farming sector, which generates £1.3billion across the county and the tourism industry is worth £824m.

The Parish Council firmly believes the country's No.1 priority should be food production. That seems to have been sacrificed on the altar of biodiversity. The amount of top quality land being lost to food production would have a detrimental effect on Britain striving to become more self-sufficient in feeding itself. It would increase the amount of food needed to be imported and inevitably increase the field to fork mileage and increase our nation's carbon output when we should be doing everything to reduce this to achieve the governments net zero goal.

Bilbsy & Farlesthorpe Parish Council would therefore like to see included with any application, compliance with regulation 5(2) of the EIA Regulations as set out below:

(2) The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors-

- (a) population and human health;
- (b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC(14) and Directive 2009/147/EC(15);
- (c) land, soil, water, air and climate;
- (d) material assets, cultural heritage and the landscape;
- (e) the interaction between the factors referred to in sub-paragraphs (a) to (d).

(3) The effects referred to in paragraph (2) on the factors set out in that paragraph must include the operational effects of the proposed development, where the proposed development will have operational effects.

(4) The significant effects to be identified, described and assessed under paragraph (2) include, where relevant, the expected significant effects arising from the vulnerability of the proposed development to major accidents or disasters that are relevant to that development.

(5) The Secretary of State or relevant authority, as the case may be, must ensure that they have, or have access as necessary to, sufficient expertise to examine the environmental statement or updated environmental statement, as appropriate.

In addition, details should be included which specifically identify and include:

1. Impact on the loss of agricultural land currently important in helping the UK in its food security measures.
2. Comprehensive study and report on the impact such development will have on the tourist industry. In particular, the erection of the interconnector and substations along the main route to the coast and the visual impact from the Wolds Area of Outstanding Natural Beauty.
3. A survey of all local roads and impact thereon in terms of construction traffic both within the parishes affected and along the major routes to be used to access the site(s)
4. A comprehensive and extensive bat survey for the proposed route and the proposed interconnector sites.
5. A comprehensive wildlife habitat and species survey for the proposed route and the interconnector sites and up to 10 metres outside the range of the application site(s), together with mitigation measures to protect all wildlife species in the area including flora and fauna.
6. Impact Assessment on existing underground infrastructure.
7. The cost of repairing the damage caused by heavy vehicles during the construction stages to the road infrastructure, which will probably last years.
8. Calculations for compensation payable to local people whose properties would be blighted or the businesses who would see a substantial drop in their ability to maintain a viable income.
9. The disruption which will undoubtedly be caused to local residences including, disruption to daily activities, light and dust pollution,
10. Impact on local medical and mental health and access to emergency services.
11. Impact on existing infrastructure including damage/pollution to water courses, broad band and telephone disruption due to pylons.

The parish council and the majority of people in our parish would prefer the cabling to continue under the sea and come onshore further south, (in line with National Grid "Beyond 2030 Report). This would negate the need to build the switching and converter stations.

Natural England

This email is to confirm that Natural England will be responding directly to the Planning Inspectorate with our comments.

NATS Safeguarding

NATS operates no infrastructure within 5km of the proposal's route. Accordingly, we anticipate no impact from the development and have no comments to make on the Application.

Lincolnshire Gardens Trust

Ms Alison Allighan our Conservation Officer colleague has already responded to you on behalf of the national charity The Gardens Trust and also on our behalf in her letter of 21 August 2024 regarding S/064/01147/ 24 National Grid Electricity Transmission: Consultation from PINS on an EIA scoping opinion on Eastern Green Link 3 and 4

An initial study of the scoping area indicates potential impacts on two RPGs in the East Lindsey District Council (ELDC) area, which lie just outside the current scoping boundary:

Well Hall Grade II Grid Ref TF 44309 73380 At its nearest points to the scoping area boundary the RPG is approximately 1km away to the south-east and north-west.

Gunby Hall Grade II Grid Ref TF 46752 66820 where the north and west boundaries of the RPG are contiguous with those of the scoping area.

In both cases we request that the scoping boundary be extended to include the RPGs within the study area to allow full Heritage and Landscape Visual Assessment of any potential impacts to be undertaken.

Also please note that, although outside ELDC, a further RPG which may be similarly impacted is Boston Cemetery Grade II Grid Ref TF 32717 45594.

What we do not understand is why there are two lines so close together, and at some points parallel to each other, or are they alternative options for the same thing? Perhaps you could advise.

Lincolnshire Gardens Trust continues to have concerns that the views from the aforementioned nearest Registered Parks and Gardens might be affected by this major project - Well Hall, Gunby Hall and Boston Cemetery given the presumably large size of the proposed pylons, especially the closest, Well Hall. where parts of its south-east boundary are approximately 2.5 kms from the western edge of the study area.

In addition, we have endeavoured to ascertain if any non-RPG historic landscapes, parks and gardens are affected but that has proved difficult and time-consuming to ascertain from the plans made available. So it is not possible, given the short 7-day time frame you gave us to respond, with any further details of historic landscapes, especially those on higher ground, which might be affected. However, we would be grateful to remain included in any further consultation related to the above development.

Review of the Scoping Report

At this stage the following comments are offered in connection with the topic areas as listed. As stated in the aforementioned section, where no opinion has been received from in-house advisors at the Council nor has there been an external consultant employed to provide comment then general observations have been put forward. Some chapters proposed in the scoping report are best covered by the County Council or other statutory stakeholders and so in this case as officers at the LPA we have remained silent.

Landscape and Visual

The potential visual receptors have been outlined, however representative viewpoints must be submitted and approved prior to the assessment being undertaken. Supporting Zone of Theoretical Visibility analysis, as defined within the scoping report and as noted below should also be provided to ensure that the proposed study area is sufficient.

ZTV methodology in Paragraph 6A.4.45 and 7A.4.51 notes features to be included within ZTV calculation. ZTV analysis should also include a bare-earth scenario to show the potential worst-case.

It is unclear from the Landscape / Visual methodologies how results of ZTV analysis will be presented. It would be most useful to aid in the understanding of visibility of the pylon route if,

alongside blanket visibility additional ZTV plans indicate the number of pylons likely to be visible through the use of overlapping ZTVs.

ZTV analysis is proposed for pylon routes, ZTV analysis should also be undertaken for the maximum foreseeable parameters of development within substation compounds. The parameters used to inform these ZTVs should be included alongside them.

The Landscape and Visual methodologies including assumptions and limitations outlined within them are appropriate.

Visual representations are proposed to be in line with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019) noting a combination of type 2, 3 and 4 visualisations are proposed. Locations for representative viewpoints should be submitted for approval along with the type of visualisation proposed and appropriate justification for the visualisation type.

The proposed approach to assess impacts on both national, and local level landscape character areas is appropriate to allow for assessment of impacts at relevant scales.

NCA Profile 41: Humber Estuary can be scoped out of the assessment as stated in paragraph 6.5.43.

LCT 1: Industrial Landscape (Humber Estuary LCA) can be scoped out of the assessment as stated in paragraph 6.5.52.

RCLT 1B: Coastal Dunes, Beach and Intertidal Sand Flats, RLCT 1C: Shallow Coastal Waters, RLCT 1A: Coastal Saltmarshes and Mudflats, RLCT 1E: Offshore Industries, Fisheries and Navigations can be scoped out of the assessment as stated in paragraph 6.5.56.

RLCT 4B: Wooded Vales can be scoped out of the assessment as stated in paragraph 6.5.57. LCA E4: Marshland St. James can be scoped out of the assessment as stated in paragraph 6.5.61.

Table 6.2: Impacts, receptors and potential for significant effects and Table 6.3: Proposed scope of the assessment outline elements to be scoped in and out of the assessment in line with reasoning highlighted above, no changes proposed to elements scoped in or out here.

Table 7.2: Impacts, receptors and potential for significant effects notes the elements to be scoped in and out of the visual assessment, no changes proposed to elements scoped in or out here.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, the LVIA should consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics. The EIA process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

Cumulative schemes to be included within cumulative assessment should be submitted prior to undertaking assessment.

As officers we are concerned about the extent of overhead cables and this is echoed in some of the internal and external responses received.

Ecology and Biodiversity

At this early stage in the development of the Scheme, only limited desk-based information has been presented within the Scoping Report.

The Scoping Report details that on respect of biodiversity, key consultees have been identified for engagement throughout the pre-application stages of the process.

The biodiversity assessment will consider the potentially significant effects on biodiversity receptors that may arise from the construction and operation of the Scheme.

The Councils ecologist has not responded and the Wildlife Trust may have chosen to comment directly on the consultation, however having reviewed the information put forward within the Scoping Report, the approach taken appears reasonable in the methodology and we have no specific comments to offer other than the importance of achieving a 10% biodiversity net gain for this proposed nationally significant development, in line with The Environment Act 2021.

Cultural Heritage

No comments have been received from the Council's Archaeological and Cultural Heritage officer, however having reviewed the information put forward within the Scoping Report, the approach taken appears reasonable in the methodology and we have the below comments to offer:

- The Council would expect a detailed landscape and visual assessment for any above ground features and for each to be looked at separately pending the final location and scale.
- We would expect a scheme of trail trenching to be included as part of the main planning submission.

Please note that a number of consultees internal and external have raised the impact of the proposal on cultural heritage as an issue and this must be addressed in full within any prospective submission.

Geology and Hydrogeology

The LPA do not have an in-house geologist and the Coal Authority and the County Council may have chosen to comment directly on the content of the consultation, however having reviewed the information put forward within the Scoping Report, the approach taken appears reasonable in the methodology and we have the below specific comments to offer:

- Soil management practices may need further evidence

Lincolnshire County Council act as Lead Local Flood Authority and may comment directly to the proposed development. Having reviewed the information put forward within the Scoping Report, the approach taken appears reasonable in the methodology and we have no specific comments to offer.

Agriculture and Soils

The council do not have a specific officer to deal with such matters however this topic area is of fundamental concern to the Council simply due to the amount of land that is associated with the development. The NPPF is clear that planning policies and decisions should contribute to and enhance the natural and local environment by (amongst other criteria) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); and recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland. Natural England provide extensive guidance on the matter and the Applicant is urged to follow this in their preparation of their work as it is acknowledged that this is effectively a desire to challenge the current agricultural classification of the site (please see <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>).

These comments are echoed by internal consultees including elected councillors who have significant concern over the impact of the development on Grade 1 agricultural land.

Planning policy officer have also commented stating that whilst we understand the Grimsby to Walpole 'New Walpole Substation Location Options report' shows underground DC is very much more expensive than the overhead AC line option however, in general terms from the point that the EG3 & 4 schemes come on shore they have a similar route to Weston and then the Walpole. We would encourage the Applicant to explain in clear terms why the schemes cannot be more joined up and allow more undergrounding of the overhead line. This is echoed in detailed comments from Holbeach Parish Council and we would invite the Applicant to review these comments as officers feel they are well informed and justified.

Traffic and Transport

Lincolnshire County Council act as highways authority and may comment directly on the proposed development. Having reviewed the information put forward within the Scoping Report, the approach taken appears reasonable in the methodology and we have no specific comments to offer other than the following points:

- The suitability of the rural roads, many of which are in poor condition (e.g. subsidence), to cope with the loading by heavy construction vehicles. What mechanism is in place for any urgent reinstatement. Is a survey of the roads (and any strengthening needed) to be carried out at the commencement of works?
- What restrictions will be placed on working hours/days?
- What is the procedure in place to deal with complaints from residents regarding access, noise, dust etc.?

- Construction compounds and field accesses in the countryside can have a significant affect and we would therefore welcome a full scheme of remediation and reinstatement after the cable/works have been undertaken.

Please note that a number of consultees internal and external have raised the impact of the proposal during construction on the highway network as an issue and this must be addressed in full within any prospective submission.

Noise and Vibration

No objections have been received by the Council's Environmental Health Officer however as officer we have reviewed the information put forward have the following comments:

1. Please provide the LPA with appropriate contact details in event of complaints during construction
2. Ensure the LPA and all relevant Noise sensitive receptors (NSR) in the immediate area are informed of any proposed works outside of normal working hours
3. Maintain sound barriers in good order
4. Vibration, ensure the LPA and all Vibration Sensitive Receptors in immediate area are informed of operations such as piling where vibration is likely to exceed 0.3mms and ensure appropriate monitoring equipment is used in vicinity of works

Air Quality

The Council's Environmental Health Officer has not commented, however the following comments are provided in relevance to the development at this stage:

- Burning of waste should be avoided. Any burning of waste deemed strictly necessary should be undertaken in accordance with the relevant waste management exemption issued the Environment Agency, and consideration should be given to the timing of such burning, and the prevailing weather conditions to impact emissions to air and nuisance to offsite receptor's; and
- Soil stockpiles should be sealed to recued fugitive dust emissions.

Water Environment

This topic area will be covered by engagement with the County Council however please note we have received comments from Witham Fourth District Internal Drainage Board who have expressed significant concern over the impact on their watercourses and operations.

Other Matters

We have not received comments from officers with regards the potential impact of the proposal on Tourism however a number of stakeholders have expressed a number of concerns on this topic. Whilst as officers we agree with the proposed methodology on this issue, we would invite the Applicant to read the concerns raised and ensure all areas are covered in the proposed list of receptors effected.

Concluding Remarks

Whilst we appreciate many stakeholders will comment directly to the Applicant on the project, we wanted to provide a response based on the submitted application with assessment of the proposed development.


We note your community engagement to date however we would welcome future discussions over any proposed community benefits as well as any proposed employment and skills schemes that could be provided to the local workforce as well as any other potential grid infrastructure improvements that may be facilitated by the development.

This advice is based upon the information available at this time. Please note that the advice is given without prejudice to any future comments made by the LPA upon the receipt of further information, whether during or before the submission of a full EIA planning application.

If you have any queries, please do not hesitate to contact me on the details provided. We look forward to being involved again in the next stage of the process.

Yours sincerely,

Sam Dewar MRTPI
Consultant Planning Officer

@daplanning.co.uk


From: [Elkington Parish](#)
To: [Grimsby to Walpole](#)
Subject: Consultation Scoping Opinion Grimsby to Walpole
Date: 08 August 2024 13:26:20

You don't often get email from elkingtonparishcouncil@gmail.com. [Learn why this is important](#)

Elkington Parish Council is very concerned at the impact these proposals will have on the area, in terms of visual intrusion; wildlife; loss of agricultural land and impact on tourism and economy.

To that end the Elkington Parish Council would like to see included with any application:

Compliance with regulation 5(2) of the EIA Regulations to ensure that -

(2) The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors—

(a) population and human health;

(b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC(14) and Directive 2009/147/EC(15);

(c) land, soil, water, air and climate;

(d) material assets, cultural heritage and the landscape;

(e) the interaction between the factors referred to in sub-paragraphs (a) to (d).

(3) The effects referred to in paragraph (2) on the factors set out in that paragraph must include the operational effects of the proposed development, where the proposed development will have operational effects.

(4) The significant effects to be identified, described and assessed under paragraph (2) include, where relevant, the expected significant effects arising from the vulnerability of the proposed development to major accidents or disasters that are relevant to that development.

(5) The Secretary of State or relevant authority, as the case may be, must ensure that they have, or have access as necessary to, sufficient expertise to examine the environmental statement or updated environmental statement, as appropriate

In addition details should be included which specifically identify and include:

- 1. A comprehensive and extensive bat survey for the proposed route and the proposed interconnector sites*
- 2. A comprehensive wildlife habitat and species survey for the proposed route and the interconnector sites and up to 10 metres outside the range of the application site(s), together with mitigation measures to protect all wildlife species in the area including flora and fauna.*
- 3. A survey of all local roads and impact thereon in terms of construction traffic both within the parishes affected and along the major routes to be used to access the site(s)*
- 4. Impact Assessment on existing underground infrastructure.*
- 5. Comprehensive study and report on the impact such development will have on the tourist industry, in particular the erection of the interconnector and substations along the main route to the coast and the visual impact from the Wolds Area of Outstanding Natural Beauty.*
- 6. Impact on the loss of agricultural land currently important in helping the UK in its food security measures.*

Regards

J. Cooper

Clerk to Parish Council

E;kington

Hannah Terry
Senior EIA Advisor
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Our Ref: XA/2024/100136/01
Your Ref: EN020036

Date: 02 September 2024

Sent via email to
grimsbytowalpole@planninginspectorate.gov.uk

Dear Hannah

Application by National Grid Electricity Transmission plc (the Applicant) for an Order granting Development Consent for the Proposed Grimsby to Walpole Project (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for referring the above consultation which was received on 6 August 2024.

The Environment Agency has reviewed the *Environmental Impact Assessment Scoping Report* undertaken by National Grid for the above scheme, referenced *EN020036:000004-GWPL*.

For the topics within our remit, we broadly agree with the topics that have been scoped in. We further recommend inclusion of the following topics addressed below to be scoped into the Environmental Impact Assessment and wish to make the following comments:

1. Flood Risk

Large parts of the proposals are located within Flood Zone 2 and 3, land assessed as having between a 1 in 100 and 1 in 1,000 annual probability (1% - 0.1%) and land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) in any given year. Other parts are located within Flood Zone 1 which is land defined as a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%) in any given year.

In accordance with National Planning Policy Framework (NPPF) and the sequential test (paragraph 168), development should apply a sequential, risk-based approach to the location of development, taking into account all sources of flood risk and the current and future impact of climate change, to avoid (where possible) flood risk to people and property. The project should take a sequential approach where it can, if there are any opportunities for development to be located outside of flood zones 2 and 3 and into flood zone 1, this should be prioritised.

As part of the preferred routes identified the cross areas where development is located within Flood Zone 3b (functional floodplain), essential infrastructure (such as power stations and sub stations etc) that has passed the Exception Test, and water-compatible uses, should be designed and constructed to:

- remain operational and safe for users in times of flood;
- result in no net loss of floodplain storage;
- not impede water flows and not increase flood risk elsewhere

If there is any above ground construction that is in an undefended area, any increases in the footprint of the buildings will require floodplain compensation; the Flood Risk Assessment (FRA) needs to consider floodplain compensation on a level for level, volume for volume basis. With regards to floodplain compensation, we would usually consider the 1 in 100 year plus allowance for climate change flood height as the 'design flood'. The allowance for climate change may differ in river catchments.

In accordance with the NPPF (paragraph 170) the development will be safe for its lifetime, without increasing flood risk elsewhere, where possible reduce flood risk overall, this should be addressed in the FRA.

1.1 Issues to be scoped in

We are concerned that operation and maintenance of the overhead lines has been scoped out. We are concerned due to flood debris possibly affecting and damaging the overhead lines during an extreme flood event.

Additionally, another issue that has not been scoped in is assessing the impacts of scaffolding being used in watercourses during the construction phase. This is due to assuming this will be assessed through acquiring Flood Risk Activity Permit (FRAPs) and/or other consent. However, due the possibility of disapplying FRAPs this assessment may not occur outside of the DCO. This could end up with causing damage to watercourses and an increase in flood risk.

Decommission in the scoping has not been assessed. While we understand this, we will need an agreement going forward that if the project or aspects of the project are going to be decommissioned then an assessment will be undertaken to ensure this is safe and doesn't leave an negative lasting effect on the flood risk of the site and surrounding area or cause increased risk whilst decommissioning.

1.2 Assumptions and Methodology

We are happy with the methodology presented in relation to flood risk, apart from the following:

'It is assumed there is sufficient data from the Environment Agency to define the current condition and standards of protection provided by existing flood defences, and that no baseline condition surveys will be required;'

This should not be assumed as not all our assets have been surveyed within recent year so many surveys may be outdated and inaccurate or assets may have not been surveyed since being built.

1.3 Lifetime of the development

The applicant has not provided a life expectancy for this scheme however we would expect the applicant to assess to a minimum of 75-year life expectancy or above. This is due to the Planning Policy Guidance stating that the starting point for assessing the lifetime risks of non-residential development should be at least 75 years.

Additionally, the proposed site of the scheme crosses areas benefiting from flood defences. The applicant will need to assess if these defence will protect to the standard and for the lifetime of the development. This may mean that works needs to be undertaken to improve the condition of deteriorating defences to ensure they will have the necessary level of protection for the scheme.

1.4 Climate change

The applicant has proposed to look at the impacts of climate change. This is necessary to understand future flood risk to the development. Due to the minimum lifetime of the development the applicant should assess to the 2080's epoch, designing to the higher central climate estimations and sensitivity testing with the upper end climate estimations.

Furthermore, the applicant should be using the 1 in 100yrs + an allowance for climate change as the design event when reviewing the necessity for floodplain compensation. Additionally, the design flood level should be used when designing finished floor levels and river crossings with an additional 600mm freeboard as the minimum height.

1.5 Ordinary watercourse

Across the planned corridor there are many interactions with Ordinary Watercourses which do not have associated flood zones on the Environment Agency's Flood Map for Planning. However, this does not mean they do not have flood risk. Watercourses with a catchment smaller than 3km² would not have been captured in the modelling which produces our flood zones which means the risk may not be accurately represented for many of these watercourses. Additionally, the applicant will need to gain consent from the Lead Local Flood Authority to do works to and within proximity to the watercourses.

1.6 Culverts

In Chapter 4 (Description of the Project, 4.8) it mentions culverting which we are generally opposed to culverting because it can damage habitats, interrupt wildlife corridors and disrupt river continuity and have an impact on flood risk. Therefore, any culverting of a main river would require a flood risk activity permit (FRAP) under the Environmental Permitting (England and Wales) Regulations 2016. The Environment Agency would unlikely grant a permit due to its impacts on nature conservation, fisheries, ecology, physical habitats, and Water Framework Directive (WFD) requirements.

Any form of temporary works as highlighted in Section 4.8.20 would require a FRAP, we would need to be consulted on the design, construction, mitigation and compensation measures.

We welcome the method used to protect the environment and we would like to see detailed plans as addressed in Section 4.8.42 Horizontal Directional Drilling (HDD) in the Environmental Statement.

1.7 Modelling and Data

All rivers the corridor interacts with have been modelled by the Environment Agency to understand the fluvial flood risk. Additionally, where the corridor is at risk of tidal flooding, breach and overtopping modelling has been undertaken. It is important to note that some of our model data is old and may present limitations. Even the data which is more recent may not be suitable for the purposes the applicant wishes to use it for and should modelling work be required in connection with the activities, it will be necessary to check that the data used represents current risk, uses the latest available datasets, complies with current modelling standards, is at a scale suitable for the assessment you're undertaking, captures the detail required for a site-specific assessment, makes use of current climate change allowances. This is emphasised within the guidance on Using Modelling for Flood Risk Assessments (December 2023) available online at Using modelling for flood risk assessments - GOV.UK (www.gov.uk).

The applicant acknowledges the potential limitations with existing modelled datasets and proposes to review and update models as necessary in line with guidance on undertaking modelling for flood risk assessment.

Some of the existing Environment Agency hydraulic models in this area are over 10 years old and use boundary condition data that should be reviewed. Furthermore, the climate change allowances applied to many of the models for the watercourses which bisect the order limits have since been superseded by more recent uplifts as part of UKCP18. The response from the applicant is that existing Environment Agency modelled data will be reviewed and updated, as necessary. This is in line with the guidance on undertaking modelling for Flood Risk Assessments. Similarly, the applicant acknowledges that some of the models may not utilise the latest climate change allowances and will update as necessary to align with these.

In the Assumptions and Limitations section of the scoping report (10.9.1 page 10-43) the applicant states that it "*is assumed that there is insufficient data to fully characterise all aspects of flood risk to the project. As a consequence, hydraulic models may need to be updated and/or created to inform the FRA*". We agree with this

acknowledgement. Even if our models were recently produced it is always important for third parties to check that they are suitable for their needs and site-specific flood risk assessment. Often Environment Agency models are built for strategic flood risk mapping purposes so even if the data used in EA models is recent there may be implications around scale and resolution which may mean that a particular model may not be suitable to inform site specific flood risk. It is down to the applicant to review our data to ensure it meets their needs.

We would recommend early engagement with us to review any hydrological assessment or hydraulic model development so we can provide advice and support. In some cases, the Environment Agency hold detailed hydraulic models for some watercourses which may be of use for Flood Risk Assessment Purposes. Hydraulic modelling information can be requested via email: lnenquiries@environment-agency.gov.uk

Please bear in mind that these hydraulic models are often strategic scale models and were not developed for site specific use. It is important that the applicant reviews any Environment Agency modelling data we provide to check that it is suitable for their purposes. This would involve checking aspects such as climate change uplifts and design flow estimates to ensure they are still current and make use of the best available information and methods.

Additionally, the applicant should review both our fluvial and tidal hazard mapping to gain an understanding of the possible risks of a flood event and assess the necessary mitigation and protection needed.

Section 10.5.43 (additional baseline information required page 10 – 19) of the scoping report describes how Product 7 modelling information will be requested. For information, the Coastal Flood Boundary (CFB, 2018) dataset may also be of interest and can be obtained online via [Defra data services platform](#). This may serve as a useful dataset for checking the boundary conditions within coastal models for the East Coast and the Wash (Mott Macdonald, 2010) some of the outputs of which cross the order limits for the project.

We would recommend in Section 10.8.3 page 10 - 38 Technical guidance purposes to consult on undertaking modelling for flood risk assessments which is available online at [Using modelling for flood risk assessments - GOV.UK \(www.gov.uk\)](#)

In Section 10.8.2 (page 10-38 Proposed Data Sources), use of the FEH Webservice for hydrological catchments is a good first starting point for catchment identification, however, please note that some of the catchments within the vicinity of the order limits are flat and modified. In such cases it would be sensible to cross check catchment extents from the FEH Webservice against other datasets such as Lidar data and river and drainage network information.

We recommend that the wording in Table 10.8: Criteria for assigning impact magnitude page 10-41 *should have* regards to impact magnitude as described within table 3.7 within the Design Manual for Roads and Bridges (DMRB), increases in peak flood levels of less than or equal to 10 millimetres are described as negligible. Please note that the classification presented within this table is slightly at odds with the National Planning Policy Framework which details that there should be no increases to flood risk elsewhere because of new development. Any impacts to flood risk will need to be

reviewed on a case-by-case basis as the spatial extent of any increase is also an important consideration not just the magnitude of any increase in peak water levels.

In Section 10.0 Assumptions and Limitations page 10-43. This section describes how it is assumed that there is insufficient data to fully characterise all aspects of flood risk to the project and that hydraulic models may need to be updated or created to inform the Flood Risk Assessment. The Environment Agency agree with this statement. It is important to review any Environment Agency modelling data to ensure it is suitable for your needs and representative. Further guidance and suggested checks can be found online at [Using modelling for flood risk assessments - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/using-modelling-for-flood-risk-assessments). For information, some of the models for watercourses which bisect the order limits for the project use climate change allowances which have since been superseded by more recent guidance as outlined within [Flood risk assessments: climate change allowances - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances).

Furthermore, some of the fluvial and coastal boundary conditions within the hydraulic models are quite old and more recent methods and data have since become available. For example, with respect to the coastline, more recent design water levels are available via the Coastal Flood Boundary (CFB, 2018) dataset. Similarly, with respect to climate change allowances, more recent fluvial and sea level rise uplift guidance and values can be found online at [Flood risk assessments: climate change allowances - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances).

1.8 Assets

We would also like to highlight to the applicant that they will need to:

- Survey the pre- works and post-works condition of the assets they will be interacting with and remediate any defects identified.
- Monitoring vibrations and identifying safe levels which don't adversely affect assets.

1.9 Projects within the area

The applicant should be aware there are some major projects happening within the proposed corridor and surrounding area. For example, there is a new reservoir in Southeast Lincolnshire which is being undertaken by Anglian Water in partnership with the Environment Agency. Additionally, there are works to implement the Lower Witham embankment planned for 2025/26 which should also be taken into consideration. This would be a great opportunity to work together to provide maximum environmental enhancements and deliver great outcomes.

1.10 Environmental permit

If any of the works are likely to require a Flood Risk Activity Permit (FRAP) under the Environmental Permitting Regulations, we recommend the applicant consider early on whether they might consider the disapplication of the EPR and matters pertaining to FRAPs be considered as Protective Provisions under the DCO. The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be: obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the riverbank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activitiesenvironmental-permits> or contact our National Customer Contact Centre on 03702 422 549.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity

2. Water Quality

Overall, we support the effects on water quality that are proposed to be scoped in and out. However, in the interest of ensuring the assessment covers all necessary detail, we would like to offer the following advice:

Section 10.7.13 describes the potential impacts from impermeable surfaces at the proposed substation locations. Whilst routine run-off and spill containment have been discussed, risks of pollution from firewater in the event of a fire have not been discussed. We would like to see the provision of firewater containment which aligns with final fire prevention and firefighting plans. This could manifest as manual isolation valves that the fire service could use if required to attend, or automatic shutoff valves which may activate if an automatic deluge system is installed.

Table 10.7 [Section 10.8.11] describes the proposed approach to determining watercourse sensitivity. Care should be taken by the applicant when applying this methodology, as it risks misrepresenting the sensitivity of a watercourse to pollutions and changes in water quality. The table proposes that a river with a higher Q95 flow is more sensitive than one with a lower Q95. The reverse of this is true with regards to water quality, with the less dilution meaning a higher sensitivity to change. Additionally, the table proposes that watercourses with a Water Framework Directive (WFD) designation are more sensitive than those that do not. This is again inaccurate, as WFD designation is a method of monitoring and classifying the ecological health of the water environment and not an indication of greater or lesser sensitivity to change. When determining the sensitivity of a watercourse, the applicant should ensure that professional judgement and the results of any surveys are also incorporated into the assessment.

Table 10.8 [Section 10.8.12] proposes to use changes in Water Framework Directive (WFD) status as the key indicator for the magnitude of an impact. This approach also risks misrepresenting impacts from significant pollution and changes in water quality,

which can cause detrimental effects on the local ecology without impacting the WFD status of the overall waterbody. This could be due to the duration of the change or the location of the impact in relation to monitoring locations used to classify individual element status. The Applicant should also consider the duration, extent and severity of any water quality impacts when determining their magnitude.

We welcome the initial Code of Construction Practice (CoCP) which has been provided in Appendix 4A.2. To aid with the development of effective mitigation, we would like to offer the following advice:

Table 4A.2 [Section 4A.6] contains a list of environmental control plans which will be developed. An additional environmental monitoring plan would be beneficial in providing assurance that compliance with the CoCP, and its effectiveness at preventing pollution, will be attained.

Control measure GG16 [Table 4A.3 – Section 4A.6] states that “*there will be no intentional discharge of surface runoff to ditches, watercourses, drains or sewers without appropriate treatment and agreement of the appropriate authority*”. We welcome this proposal and would like to highlight that any water discharge activity to controlled waters will require an environmental permit from the Environment Agency. The CoCP goes on to explain that a discharge may occur without agreement in the case of an emergency. Depending on the circumstance of the emergency and the effluent being discharged, this may still constitute a water discharge activity and could be subject to enforcement action by the Environment Agency if it occurs without an environmental permit.

3. Biodiversity

The corridor is in close proximity to migratory routes from the Wash (SSSI, SPA, SAC, RAMSAR) and inland sites such as the Nene Washes (SSSI, SPA, SAC, RAMSAR) and Ouse Washes (SSSI, SPA, SAC, RAMSAR), therefore the impact of new lines on overwintering migratory birds would need to be assessed.

The proposed scheme crosses numerous Local Wildlife Sites. We would recommend the applicant considers the impact of the project on these non-statutory designated sites.

All the proposed routes involve the crossing of several watercourses, including main rivers and numerous ordinary watercourses, which poses a risk of polluting designated sites (such as SSSIs) that are hydrologically linked; therefore, a pollution prevention plan should be put into place.

We would need to see the potential impacts to protected species outside of designated sites (such as otters, bats, badgers, etc. Towers and associated works should be positioned to avoid waterbodies (ponds, ditches etc). Terrestrial habitat should also be avoided that may harbour protected amphibians (such as great crested newts). The Environment Agency holds numerous records of invasive non-native species within the corridor. We would recommend that the customer considers INNS and biosecurity measures in future plans.

Protected biodiversity that should be considered are ornithological (breeding birds and overwintering migratory birds), bats, great crested newts, arboriculture, reptile, otter, vascular and non-vascular plants and hazel dormouse.

Baseline surveys should also consider fish species, invertebrates, water voles, badgers other protected or notable species, depending on the specific circumstances and plans (such as if in-channel works are required).

Chapter 8 – Ecology and Biodiversity, 8.2

Biodiversity Net Gain (BNG) & Local Nature Recovery Strategy (LNRS)

The Environment Agency's focus and expertise is on protecting and enhancing the water environment including watercourses and wetland habitats and its inclusion within this project will help maximise the opportunities provided by BNG for recovery of wetland habitats and the water environment.

Further clarification will be required regarding the approach to the BNG and how it will be delivered. We advise the applicant to consider opportunities in Local Nature Recovery Strategies (LNRS), any mitigation measures listed for the affected waterbodies under Water Framework Directive (WFD) and contribute to the delivery of the River Basin Management Plans. We strongly advise the applicant also provide enhancements around watercourses if possible.

We welcome National Grids commitment to delivering BNG. We advise early engagement to ensure that the right biodiversity net gains are in the right places and enable a range of objectives to be aligned to deliver multifunctional benefits.

The watercourse Metric is an opportunity to deliver watercourse enhancements. BNG should be aligned with River Basin Management Plans, LNRSs, WFD objectives/mitigation measures, and Catchment Plans.

We would like to see a Biodiversity Gain Plan and Habitat Management and Monitoring Plan.

National Grid cabling projects have the potential for the creation of green corridors under overhead powerlines. We advise the applicant to look to reconnect fragmented habitats, create nature networks with a multi-species approach, and Ecological Corridor Management, across all their projects.

We would like to see the following screened in:

- 8.5.36 – 38 – Amphibians - EA screening also picked up Natterjack toad (*Epidalea calamita*),
- EA screening also shows potential presence of white-clawed crayfish (*Austropotamobius pallipes*) and Swollen Spire snail (*Mercuria anatina*)

In Section 8.8 – (Proposed Assessment Methodology) we would like to see further detailed assessments on the following sections which will provide us with confidence that all environmental aspects will be covered.

- 8.8.2 – Technical Guidance – BSI Standards Publication BS 8683:2021 – Process for designing and implementing Biodiversity Net Gain – Specification.
- 8.8.3 – Expected survey requirements – as there are watercourses within the development boundary we would expect to see River Condition Assessments here.

4. **Fisheries**

In Chapter 4 – (Description of the Project) as mentioned above culverting should be avoided as it has detrimental impact to the environment. In section 4.8.18; culvert installation and pumping of watercourse – culverting should be avoided to maintain fish passage and natural riverbed conditions. Any pumping of watercourses may require a screen on inlets and outlets of the pump. This screen must be compliant with the Eel Regulations (2009). This is to ensure eels and other fish species are protected from entrapment.

Section 4.8.41 mentions Horizontal Directional Drilling (HDD) under watercourses – the impact on fish from noise generated from vibrations should be scoped into the EIA. Additionally, any high voltage cables buried under main water courses could have an impact on fish from magnetic fields. Therefore, an assessment of magnetic fields from buried cables and their impact on fish should be scoped into the EIA. This should be included in Table 8.4.

Table 8.3; although not forming part of the designation, twait shad (*Alosa fallax*), allis shad (*Alosa alosa*) an Atlantic salmon (*Salmo salar*) (all Annex II species) are all present in the Humber Estuary SAC and should be considered within the EIA where there is functionally linked habitat impacted by the scheme.

Section 8.5.54; our records also show that allis shad, twait shad, European smelt (*Osmerus eperlanus*) and sea lamprey (*Petromyzon marinus*) are present in the main watercourses that flow into the Humber Estuary. European smelt are also present within the courses that flow into The Wash. Therefore, these species should be considered within the EIA.

Section 8.6.8; (GG11) – this should also include a suitable distance from main watercourses so as not to disturb migratory fish species, where migratory fish species are present. This is particularly important during sensitive migration and spawning periods.

We welcome the inclusion of fish surveys in Table 8.5 which are proposed following results of walk-over surveys.

We recommend that Chapter 15 (Noise and Vibration) Table 15.2 – noise impacts on fish associated with piling and trenchless crossing techniques should be scoped into the EIA and included in Chapter 8.

5. Water Environment

Chapter 10 – Water Environment, 10.8 – Proposed Assessment Methodology

We welcome River Condition Assessments (10.8.19) to be undertaken on the watercourses within the scoping boundary. We advise the applicant to engage early with BNG to ensure that the right biodiversity net gains are in the right places and enable a range of objectives to be aligned to deliver multifunctional benefits. RCA must be completed by an accredited person.

The Environment Agency holds data on River Basin Districts and WFD Status on the Catchment Data Explorer. Most of the works pass through the Anglian River Basin District, which includes the Witham Catchment Partnership and the Welland Valley Partnership. The most recent local plans for the Witham Catchment (Witham Catchment Partnership Plan 2022) and the Welland Catchment (Welland Valley Partnership Five Year Catchment Plan 2022- 2027) outline local issues and objectives. We would advise that any biodiversity enhancements around waterbodies compliment the local environmental objectives and programmes of measures within the River Basin Management Plan.

Section (10.6.5; W02) where open cut watercourse crossings are taking place, mitigation to protect fish should be in place. Where cofferdams are put in, a fish rescue may be required. If there is any over pumping of watercourses, inlets and outlets should be fitted with a screen that is compliant with the Eel Regulations (2009).

6. Geomorphology

Considerations for design of crossings

The following are general guiding principles to consider when designing watercourse crossings to avoid negatively affecting geomorphology and natural processes:

- Avoid unnecessary interference with natural processes. For instance, encourage use of trenchless techniques such as Horizontal Directional Drilling (HDD) to minimise the likelihood of cables entering the water environment.
- Ensure watercourse crossing design is informed by assessment of fluvial processes and geomorphology. For example, depth of HDD crossing should consider the likelihood of vertical channel change.
- Avoid designs which present legacy risks to natural processes and geomorphology beyond the project lifespan. For example, infrastructure such as access tunnels which are left in-situ after decommissioning could be exposed by future coastal erosion or river movement, becoming an impediment to natural processes.
- Consider opportunities to deliver Water Framework Directive mitigation measures as part of the design.
- Avoid preventing delivery of mitigation measures, e.g. avoid bringing cables to surface level in floodplains earmarked for future river restoration.

7. Groundwater Protection

7.1. Scoping

Several control and management measures are outlined in Section 11.6.4, including provision of a Foundation Works Risk Assessment (FWRA). We support these proposed measures. We have given some general information about dewatering and environmental permits, waste, and drainage below.

Topics relating to geology and hydrogeology which are to be scoped in or out of the EIA are summarised as tables 11.3, 11.8 and 20.6. We generally agree with the risks identified and are satisfied with this assessment.

Changes to groundwater aquifers due to dewatering during the Operational phase is scoped out as "there is not expected to be any dewatering as part of the operational phase of the Project." This is acceptable, but if for any reason it transpires that dewatering is required (for example, during foundation maintenance, repairs or upgrades), then suitable measures must be in place for this to be assessed at the time, and prior to any such works commencing.

Bunds associated with SGTs will act as a secondary oil containment measure (see Section 4.8.47), so the design, and the concrete used, must be suitable for this purpose.

In Section 11.6.2 it states "Vehicle parking, fuel storage, de-icer storage, rock salt storage, and washout/cleaning of ready-mix concrete vehicles and equipment will be sited outside SPZ1, where possible." Where this is not possible, suitable measures to avoid risk to groundwater must be in place.

If underground cables are required, these will need to be laid with suitable planning and mitigation. Where the placement of these cables takes place in land that may be affected by contamination, waste material will need to be appropriately managed. The preferred technique for laying underground cables is open trenches backfilled with cement-bound sand. Backfill material must not pose a risk to controlled waters (for example, chemicals within cement). Alternatively, the cables may be laid in ducts which will be installed using a trenchless installation technique such as horizontal directional drilling (HDD). This work could involve the use of drilling muds, and their use may require risk assessment to ensure they do not pose a risk to controlled waters. The proposed use of HDD techniques should therefore be given further consideration when selecting the route.

The proposed assessment methodology given in 11.8 appears to be suitable. We agree with the principle of a preliminary screening assessment outlined in 11.8.8. We would like an opportunity to review its conclusions prior to any risks being omitted from further assessment.

7.2. Dewatering

If dewatering is required, it may require an environmental permit if it doesn't meet the exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works.

[Temporary dewatering from excavations to surface water: RPS 261 - GOV.UK \(www.gov.uk\)](#)

If the scheme doesn't meet the exemption and requires a full abstraction licence, the applicant should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found here:

[Abstraction licensing strategies \(CAMS process\) - GOV.UK \(www.gov.uk\)](#)

Please note that the typical timescale to process a licence application is 9-12 months. The applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning.

The applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found here:

[Discharges to surface water and groundwater: environmental permits - GOV.UK \(www.gov.uk\)](#)

The use of drilling muds for the directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended.

7.3. Waste on site

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether excavated material arising from site during remediation or land development works are waste. Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

[Check if your material is waste - GOV.UK \(www.gov.uk\)](#)

7.4. Waste to be taken off site

Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2010
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period, the developer will need to

register with us as a hazardous waste producer. Refer to the Environment Agency website for more information.

7.5. Sustainable drainage systems

The Government's expectation is that sustainable drainage systems (SuDS) will be provided in new developments wherever this is appropriate. The Environment Agency supports this expectation. Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should:

- be suitably designed
- meet Government's non-statutory technical standards for sustainable drainage systems – these standards should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance
- use a SuDS management treatment train – that is, use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater

Where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply.

See the Environment Agency's approach to groundwater protection, position statement G13: [Groundwater protection position statements - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/342422/groundwater-protection-position-statements-gov-uk.pdf)

8. Consumptive water use

The report should cover the consumptive use of water in scoping the potential impacts to the environment.

We recommend early engagement for any or potable and/or non-potable water supplies required as this region is particularly water scarce and supply for non-potable purposes may not be guaranteed.

There are a number of potential activities which can require water in projects such as this. Examples include but are not limited to dust suppression techniques; HGV or other machinery wheel wash; on-site concrete batching; and the use of water in a bentonite clay mixing for horizontal directional drilling.

If the quantity of water required for these (combined) purposes is greater than 20m³ per day, then an abstraction licence will be required. The water demands during construction should not be underestimated as a licence may only be issued with significant restrictions which may affect design or approaches to construction. More information can be found in the [Abstraction Licensing Strategy](#) for the catchment). This may need careful consideration since the site is within different licensing strategy catchments all of which have restrictions on water availability. Considering on site storage of water may buffer demands during periods of low/medium flow when direct access to water is not permitted.

We recommend that a simple water resources assessment be undertaken at the EIA stage for consumptive and non-consumptive demands which identify uses and sources of supply (which also includes that from water company supply). This will help to problem solve any initial obstacles early and will help to expedite the permitting process later.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the details below.

Yours sincerely

Ms Noreen Nargas
Planning Specialist

Direct dial [REDACTED]

Direct e-mail [REDACTED]@environment-agency.gov.uk

From: [Mark Woodger - Principal Planning Officer \(National Infrastructure\)](#)
To: [Grimsby to Walpole](#)
Cc: [Matthew Thomas - Growth and Development Manager](#)
Subject: RE: EN020036 - Grimsby to Walpole Project – EIA Scoping and Consultation & Regulation 11 Notification
Date: 13 August 2024 12:03:21
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Good afternoon Hannah

Thank you for reaching out on this project. The DCO proposal is some distance from Essex and having looked at all the information PINS and the applicant have provided, as well as being minded or our available resources to respond to projects outside of Essex, and our knowledge of the area, it's our considered view that we have no comments to make on the as submitted EIA Scoping opinion.

KR

Mark

From: Grimsby to Walpole <grimsbytowalpole@planninginspectorate.gov.uk>
Sent: Tuesday, August 6, 2024 2:08 PM
To: Mark Woodger - Principal Planning Officer (National Infrastructure)
[\[REDACTED\]@essex.gov.uk](mailto: [REDACTED]@essex.gov.uk); [\[REDACTED\]@essex.gov.uk](mailto: [REDACTED]@essex.gov.uk); Claire Tomalin - Principal Planning Officer [\[REDACTED\]@essex.gov.uk](mailto: [REDACTED]@essex.gov.uk)
Subject: RE: EN020036 - Grimsby to Walpole Project – EIA Scoping and Consultation & Regulation 11 Notification

CAUTION: This is an external email.

Apologies, the attachment was missing – please now see attached.

From: Grimsby to Walpole
Sent: Tuesday, August 6, 2024 1:57 PM
To: [\[REDACTED\]@essex.gov.uk](mailto: [REDACTED]@essex.gov.uk); [\[REDACTED\]@essex.gov.uk](mailto: [REDACTED]@essex.gov.uk);
[\[REDACTED\]@essex.gov.uk](mailto: [REDACTED]@essex.gov.uk); [\[REDACTED\]@essex.gov.uk](mailto: [REDACTED]@essex.gov.uk); [\[REDACTED\]@essex.gov.uk](mailto: [REDACTED]@essex.gov.uk);
[\[REDACTED\]@essex.gov.uk](mailto: [REDACTED]@essex.gov.uk)
Subject: EN020036 - Grimsby to Walpole Project – EIA Scoping and Consultation & Regulation 11 Notification

Dear Sir/Madam

Please see attached correspondence on the proposed Grimsby to Walpole Project.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the

Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **2 September 2024**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Hannah Terry

Please note my working days are Monday to Thursday. I do not work on Fridays.



Hannah Terry
Senior EIA Advisor
The Planning Inspectorate

 [@PINSgov](#)  [The Planning Inspectorate](#)  [planninginspectorate.gov.uk](#)

Ensuring **fairness, openness and impartiality** across all our services

This communication does not constitute legal advice.

Please view our [Information Charter](#) before sending information to the Planning Inspectorate. Our [Customer Privacy Notice](#) sets out how we handle personal data in accordance with the law.

[Please take a moment to review the Planning Inspectorate's Privacy Notice which can be accessed by clicking this link.](#)

Please note that the contents of this email and any attachments are privileged and/or confidential and intended solely for the use of the intended recipient. If you are not the intended recipient of this email and its attachments, you must take no action based upon them, nor must you copy or show them to anyone. Please contact the sender if you believe you have received this email in error and then delete this email from your system.

Recipients should note that e-mail traffic on Planning Inspectorate systems is subject to monitoring, recording and auditing to secure the effective operation of the system and for other lawful purposes. The Planning Inspectorate has taken steps to keep this e-mail and any attachments free from viruses. It accepts no liability for any loss or damage caused as a result of any virus being passed on. It is the responsibility of the recipient to perform all necessary checks.

The statements expressed in this e-mail are personal and do not necessarily reflect the opinions or policies of the Inspectorate.

DPC:76616c646f72



Hannah Terry
Environmental Services
Operations Group 3
Temple Quay Square
2 The Square
Bristol
BS1 6PN

Development Services
Direct Dial Tel: [REDACTED]
E-mail: planning@fenland.gov.uk

29 August 2024

Our ref: F/YR24/4032/LACON

Dear Hannah,

Consultation from The Planning Inspectorate – Application by National Grid Electricity Transmission plc (the Applicant) for an Order granting Development Consent for the Proposed Grimsby to Walpole Project (the proposed Development)

Thank you for consulting Fenland District Council for observations as to the proposed National Grid development, and what information should be provided in the Environmental Statement. The nearest settlements in the district to the proposed development are Tydd Gote and Foul Anchor.

It is considered that the following factors are brought forward to impact assessment in the Environmental Statement. There is a 200 metre nature buffer either side of the River Nene and the route runs through a Natural England Risk Zone for Great Crested Newts. From a heritage point of view there are archaeological find spots in the vicinity of the route. The final consideration at this time is a potential impact to migrating birds with regard to the proposed overhead line.

If you have any questions regarding my response then please do not hesitate to contact me.

Yours sincerely

[REDACTED]

David Grant
Senior Development Officer

Data Protection Act 1998

To provide you with our services we will need to record personal information, such as your name and address. This information will be kept securely and only accessed by approved staff. We will not share your information with anyone else without first telling you. If you would like more details about how we protect personal information then please contact our Data Protection Officer.

THE FIRSBY GROUP PARISH COUNCIL

(Comprising the parishes of Bratoft, Firsby, Great Steeping, Irby in the Marsh and Little Steeping)

Clerk to Council:

Mrs L Kidd

Telephone: [REDACTED]

Email: firsby.clerk1@btinternet.com

Mobile: [REDACTED]

30 August 2024

Hannah Terry
Senior EIA Advisor on behalf of the Secretary of State
via email

Dear Ms Terry,

Re: EN020036 Grimsby to Walpole Project - EIA Scoping and Consultation & Regulation 11 Notification.

The Firsby Group Parish Council strongly object to the proposed overhead 400KV line. The option of either subsea or underground should be chosen.

It is obvious from the 1500 plus pages of the EIA Scoping and Consultation Regulation 11 Notification the previous objections from stakeholders to the project have been totally ignored by the developers. Notably Section 6 Landscape and Section 7 Visual in the Main Text. The landscape and visual impacts of the pylons with overhead lines will result in adverse outcomes for this already deprived area which do not appear to have been considered as yet regarding Socio-economic and Tourism (Section 16) and Health and Welfare (Section 17) effects.

If the nationally designated landscapes (AONB) suffer harm to the landscape, visual amenity and natural beauty then, likewise, so will other landscapes. In this area where the most socially deprived areas are dependent upon tourism associated with the attractions of our rural landscape and coastal areas, converting to an industrialised area with no suitable replacement employment opportunities will result in even greater social deprivation. If this overhead development is approved by the Labour government the area will be "taken even further down" as opposed to being "levelled up", acting against equality and human rights. The cost to the local area will far outweigh any cost incurred by the development being underground or subsea.

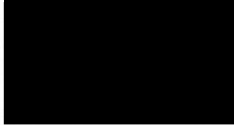
National Grid have known about the need for increased East Coast transmission for a decade so citing build speed as a reason for pylons and overhead cables in this context is ridiculous. Why did National Grid, a private monopoly company, wait so long to build the infrastructure-to increase dividends for shareholders? To cite reduced cost to the consumer is without foundation and assumes the public are totally naive; the raison d'être of any company is to maximise profits, any profits from reduction in

costs would be directed to shareholders as dividends, not the consumer in reduced bills.

The current planning framework regulated by Ofgem which has allowed this development submission to proceed is clearly not fit for purpose and should be reviewed and amended urgently. The regressive use of pylons in the name of clean, green, environmentally friendly energy whilst desecrating huge swathes of our beautiful countryside in a virtue signalling rush to Net Zero is an insult to the population, an infringement of the human rights of the population and an environmental abomination.

The IROPI indicates the current government wishes to ignore local opinion and democracy; this is not devolution but centralisation. We hope the current framework will be reviewed to ensure erection of any new pylon lines is forbidden. In the interests of equity, the "starting presumption" must be "the applicant should underground" the line. We hope you will not allow this overhead line choice to proceed and ensure an underground or subsea route is chosen.

Yours sincerely,



Mrs Linda Kidd
Clerk to Firsby Group Parish Council

cc Ed Milliband MP
Richard Tice MP

THE FIRSBY GROUP PARISH COUNCIL

(Comprising the parishes of Bratoft, Firsby, Great Steeping, Irby in the Marsh and Little Steeping)

Clerk to Council:

Mrs L Kidd

Telephone:

Email: firsby.clerk1@btinternet.com

Mobile:

Hannah Terry
Senior EIA Advisor on behalf of the Secretary of State
via email

Dear Ms Terry,

Re: EN020036 Grimsby to Walpole Project EIA Scoping and Consultation & Regulation 11 Notification.

Please see additional submission on behalf of the Firsby Group Parish Council

National Grid's (NG's) Scoping Report is ostensibly for one line of 50m 400kV pylons from Grimsby to Walpole, with new substations at Grimsby and Walpole, and two at Alford ('southwest of Mablethorpe' in all NG documents). The carrying capacity of a single 400kV pylon is less than 7GW but the new projects cited by NG to justify the Grimsby to Walpole proposal total 9.764GW. To accommodate this NG would need at least two lines of pylons. Up to 7GW of power would also be routed south from Grimsby into Alford. If this is approved, it is likely that projects already in the planning process (like ODOV) will be rerouted into the Alford substations - why would any project bury cables from Alford to Walpole when there is no need? In addition, there are numerous large scale (1GW+) solar farms mooted along the proposed route which will also require connection, hence all the vague LCS's incorporated in this document. The Alford substations will need capacity for c22GW+ (source NG) and note that there is no local requirement for any of this new renewable generation, the area is already in net spill (ie exports power to elsewhere).

To accommodate all this proposed generation, NG would require **two** 400kV lines from Grimsby to Alford and **three** 400kV lines from Alford to Walpole. Grids are designed largely in a 'boxed format' so NG would then require also a new 400kV line from Alford to Lincoln. According to NG, some 30GW is due to be brought into the B8 boundary and recently the government announced even more ambitious licensing of additional renewable generation, some of which may be landed into the Eastern coast. Alford alone could easily end up being a 40GW+ hub. Accommodating all the export routes southwards, and the various associated onshore facilities, would entail vast areas of land being dedicated to electrical infrastructure. We believe that the proposed one set of 400kV pylons and substations represents the first enabling step for the conversion of vast swathes of rural Lincolnshire, and beyond, into a series of industrial-scale electrical complexes connected by multiple sets of 50m pylons.

To cover the true scale and potential impact of this project, we therefore respectfully request (**requests are in bold**) that the Scoping includes the following eleven points:

1. **The Scoping Area should be extended to cover the whole of the 'Overhead Study Area' as shown in Figure 3.2 of the Scoping Report. (Also, the 'Overhead Study Area' should be enlarged to cover the whole of the potential pylon/associated infrastructure corridors – this is not currently the case – see Fig. 3.2).**
2. **The PEIR, EIA and ES study area should extend 5kms from the boundary of the 'Overhead Study Area' and be extended, where appropriate, to the 'Limit of Deviation'.** The topography of the route means that this development will have a significant visual and cumulative impact as the landscape, being mainly flat, is highly sensitive to change. The significance of 50m pylons is not mitigated by distance in a flat landscape of large arable fields. If the 'apparent height' of a 50m pylon at 5km is 0.61cm as claimed by the applicant, then a 25m building would appear as 0.31cm. Most structures in the landscape along the route(s) are isolated farm buildings less than 15m high, therefore the visual and cumulative impact of even a single line of pylons and associated infrastructure would be significant. This development would change the landscape character throughout the route.
3. Because of the impact of the proposed development in a (mainly) sparsely populated rural area, **all 'additional measures', 'secondary measures', 'ancillary development' and 'associated ancillary development' should be included in the Scoping and anything (apart from temporary measures necessary for construction), not included within the Scoping and EIA should not be accepted as part of the DCO.** Otherwise, there is a risk that additional lines of pylons and substations (as illustrated in Figures 3.2 & 3.4) are included in the final DCO Application without any public consultation or environmental impact assessment.
4. **The Visual Impact study area should be extended to the coast (in particular around the Gibraltar Point NNR); and the eastern edge of the Lincolnshire Wolds AONB.**
5. Several Heritage assets of national importance (Grade 1), which are likely to be seriously impacted (i.e. significantly harmed) by the proposed development are not included in the current study area. **All Heritage assets (Listed Buildings, scheduled monuments and listed Parks & Gardens) within 5kms of the 'Overhead Study Area' should be included in the PEIR/EIA/ES.**
6. **Photomontages and wirelines for the Visual Impact Assessment should be from viewpoints specifically agreed with local communities from every parish within the Visual Impact Study Area** (e.g. Parish Councils; Parochial Church Councils/District Church Councils; walkers/ramblers associations; Parish Meetings; residents etc.; i.e. 'the different groups of people likely to be affected by the project' (Scoping Report 7.18.17).
7. **Photomontages and wirelines should be provided in hard copy (printed at the optimal size for viewing), to all Parishes within the Visual Impact study area (minimum 10km radius from the Scoping Area); and on request to any**

member of the public. Photomontages cannot be properly used by a layperson on a computer screen. (Also, many areas within the route are Wi-Fi blackspots and there is no superfast broadband, so the files are too large to open).

8. **All photomontages and wirelines should conform to the Nature Scotland (2017 and updates) Visual Representation of Wind Farms Guidelines.** Panoramic photomontages should be accompanied by a single photomontage from the same viewpoint taken at 50mm focal length.

9. There is an overlap between substations LCS 6 & 8 (i.e. LCSB) in the Scoping Report (Figure 3.4), and the siting zone for the convertor station and direct current switching station in National Grid's EGL 3&4 Project Background Document. NG should make it clear which project the proposed developments belong to. Since, **if the Grimsby to Walpole Project is consented, EGL 3 & 4 will be added to the overhead lines (Table 4.3), rather than taking the buried cable route to Weston Marsh (as currently proposed), then it would be more cost-effective to combine the two projects at this stage and extend the Scoping Area and EIA appropriately.**

10. **Full flood risk assessment for inundation of seawater relating to storm surges, collapse of levées, breach of riverbanks, flash flooding, etc should be conducted for the whole (revised) Scoping Area.**

11. Finally, there is a serious issue of broadband availability along the whole route, therefore we request that **in addition to providing the photomontages (see 7 above), the applicant makes all consultation documents freely available in hard copy at locations open to the public during working hours, and at weekends (many libraries in the affected area, Alford for example, only open 4 days a week). The documents should also be made available on free memory sticks provided by NG at public information days and on request.** Otherwise, many of those most affected by the proposed development will be unable to access the information required to comment on it.

Yours sincerely,



Mrs Linda Kidd
Clerk to Firsby Group Parish Council

From: [Robyn Negus](#)
To: [Grimsby to Walpole](#)
Subject: EN020036 - Grimsby to Walpole Project – EIA Scoping and Consultation & Regulation 11 Notification - Fleet Parish Council
Date: 12 August 2024 16:24:26

You don't often get email from fleetparishcouncilclerk@gmail.com. [Learn why this is important](#)

Dear Sirs

On behalf of Fleet Parish Council we wish to express our strong opposition to the Grimsby to Walpole Project. After thoroughly reviewing the scoping report, we have significant concerns regarding the potential impacts of this project on our parish and its residents. Below, we outline our specific objections and requests for further consideration.

1. Cumulative Impact Assessment

Fleet Parish Council opposes the project due to the inadequate consideration of cumulative impacts. The current scoping report fails to provide a sufficiently detailed cumulative impact assessment. Given the number of ongoing and proposed infrastructure projects in the region, including nearby wind farms and other energy developments, it is essential to consider the combined effects of these projects on our local environment, landscape, and community wellbeing.

- We strongly urge the Planning Inspectorate to require a comprehensive cumulative impact assessment that includes the combined environmental pressures such as increased traffic on local roads, noise pollution, and visual intrusion. The absence of such an assessment is a significant oversight and one of the primary reasons for our opposition.

2. Long-Term Health Effects

The potential long-term health effects of this project are of great concern to our community. The scoping report's current focus on short-term construction impacts is insufficient.

- We insist on a thorough health impact assessment (HIA) that addresses long-term risks, including prolonged exposure to electromagnetic fields (EMF), deteriorating air quality due to increased traffic, and sustained noise pollution. Our parish includes vulnerable populations, such as the elderly and children, who could be disproportionately affected by these risks. The lack of attention to these long-term effects further solidifies our opposition to the project.

3. Biodiversity

Fleet Parish is characterised by its rich biodiversity, including species and habitats that are integral to the local ecosystem. The current scoping report does not adequately assess the potential impacts on these natural assets.

- We oppose the project unless the EIA includes a comprehensive biodiversity assessment that covers all potentially affected species, particularly those unique to our area, such as rare bird species and native wildflowers. The potential disruption to these habitats is unacceptable and poses a significant threat to our local environment.

4. Visual and Landscape Impacts

The rural landscape of Fleet Parish is a vital aspect of our community's identity and quality of life. The introduction of new overhead lines and substations will have a detrimental impact on this landscape, affecting both residents and visitors.

- We strongly oppose the project on the grounds that the visual impact will be significant and detrimental. We urge the Planning Inspectorate to require the use of underground cabling and extensive screening measures, including native tree species, to minimise these impacts. The potential damage to the rural

character of Fleet Parish is unacceptable.

5. Community Consultation

We are deeply concerned about the adequacy of the community consultation process. The residents of Fleet Parish deserve a voice in decisions that will so profoundly affect their lives.

- We oppose the project unless there is a commitment to a robust and transparent community consultation process, including public meetings and opportunities for meaningful input from local residents. The current level of engagement is insufficient, and we demand that the voices of our community be heard and respected.

6. Socio-Economic Impacts

Fleet Parish's economy relies heavily on small businesses, agriculture, and tourism. The socio-economic impacts of the project, particularly during the construction phase, could be devastating.

- We oppose the project due to the lack of a detailed assessment of its potential socio-economic impacts. The EIA must address the potential disruptions to local businesses, particularly those along local roads where traffic disruptions are likely. Additionally, the impact on tourism and heritage sites could lead to long-term economic decline, which is unacceptable to our community.

Conclusion

Fleet Parish Council is firmly opposed to the Grimsby to Walpole Project. The potential environmental, health, and socio-economic impacts of this project are unacceptable to our community. We urge the Planning Inspectorate to consider these objections seriously and to require comprehensive assessments and mitigations that reflect the full scope of the project's impact on Fleet Parish.

We appreciate the opportunity to provide input, but our position is clear: this project, as currently proposed, is not in the best interest of our community.

Robyn Negus
Clerk - Fleet Parish Council
Mobile Contact [REDACTED]
Please note - I work part-time Wednesday-Friday

From: [East and East Midlands Forest Area Enquiries](#)
To: [Grimsby to Walpole](#)
Subject: Grimsby to Walpole EIA Scoping Consultation
Date: 02 September 2024 14:01:35

You don't often get email from eandem@forestrycommission.gov.uk. [Learn why this is important](#)

Good Afternoon

Thank you for consulting the Forestry Commission on this proposal.

As the Governments Forestry Experts, we endeavour to provide relevant information to enable the project to reduce any impact on irreplaceable habitat such as ancient semi-natural woodland, as well as other woodland.

We note there are areas of Ancient Semi Natural Woodland both within and close to the site area; the proposed area passes close to Bradley Woods Ancient Semi natural woodland, with both Withern Wood and Hornby/Mother Wood Ancient Semi Natural Woodlands within the site area.

Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).

Section 5.4.32 of EN-1 – The Overarching National Policy Statement for Energy states:

“Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both the construction and operational phases”

Section 5.4.53 goes on to state:

“The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists”

We would particularly refer you to further technical information set out in Natural England and Forestry Commission’s [Standing Advice on Ancient Woodland](#) – plus supporting [Assessment Guide](#) and [“Keepers of Time” – Ancient and Native Woodland and Trees Policy in England](#).

The Standing Advice states that proposals should have a buffer zone of **at least** 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, you’re likely to need a larger buffer zone.

There are also numerous small fragmented areas of Mixed Deciduous woodlands within the site area. Mixed Deciduous Woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England).

They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the

Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 - "List of habitats and species of principle importance in England".

Fragmentation is one of the greatest threats to mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic or dust, particularly during the construction phase of a development.

For any woodland within the development boundary, land required for temporary use or land where rights are required for the diversion of utilities, the Root Protection Zone must be taken into consideration. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy. Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals) and fencing off these areas to prevent unintended incursions into the root protection zone.

A scheme that bisects any woodland will not only result in significant loss of woodland cover but will also reduce ecological value and natural heritage impacts due to habitat fragmentation, and have a huge negative impact on the ability of the biodiversity (flora and fauna) to respond to the impacts of climate change. Woodland also provides habitat for a range of Section 41 Priority Species including all bats. Therefore, measures should be taken to avoid illuminating any woodland to avoid any disturbance to wildlife, this should be detailed in any lighting strategy.

There are also several areas of grant funded woodland within the project area, that were either established or are managed with the support of public money. These grants are still in obligation. The landowner is expected to meet all of the terms and conditions of the agreement contract. Failure to do so is likely to require the Forestry Commission to seek to recover all of the relevant grant that has been paid, to avoid public money being wasted.

It is expected that there will be a thorough assessment of any loss of all trees and woodlands within the project boundary and the development of mitigation measures to minimise any risk of net deforestation because of the scheme.

Hedgerows, individual trees and woodlands within a development site should also be considered in terms of their overall connectivity between woodlands affected by the development. Perhaps with the creation of some larger woodland blocks and hedgerow/hedgerow trees possibly between the existing woodland blocks on site, to ensure maximum gains to increase habitat connectivity and benefit biodiversity across the whole site, not solely in specific areas or just to be used as screening.

With the Government aspiration to increase tree and canopy cover to 16.5% of land area in England by 2050. The Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss. However, there are a number of issues that need to be considered when proposing significant planting schemes:

- Biosecurity of all planting stock needs to be considered.

- Woodlands need to be climate, pest and disease resilient.
- Maximise the ecosystem services benefits of all new woodland wherever possible (flood reduction)
- Planting contributes to a 'resilient treescape' by maximising connectivity across the landscape.
- Plans are in place to ensure long term management and maintenance of woodland.

Access will also need to be considered for the future management of both existing and any proposed new woodland planting.

We hope these comments have been useful to you. If you require any further information, please do not hesitate to contact me.

Best wishes

Victoria Whaley MRTPI

Partnership & Expertise Manager

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorised to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware.



Frithville with Westville Parish Council

Ms Sarah Knowles (Clerk)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [@hotmail.co.uk](mailto:[REDACTED]@hotmail.co.uk)

31st August 2024

To Whom It May Concern,

Re: Environment and scoping process – Grimsby to Walpole project

In response to recent correspondences, we have identified areas of Environmental concerns that as a consultation body, we feel should be included within the Environmental statement for consideration. While we understand the importance of expanding our electricity infrastructure, the installation of overhead electrical cables and pylons can raise various environmental risks and concerns that must be addressed to ensure sustainable practices.

Overhead electricity pylons can have significant and lasting negative effects on the environment, including the following:

Visual pollution and landscape degradation:

Overhead pylons are often large and visually intrusive, causing significant disruption to the natural landscape. They can detract from the scenic beauty of rural areas, leading to a loss of visual amenity for both residents and visitors. This degradation of the landscape can, in turn, affect local tourism and the well-being of communities that value their natural surroundings.

Impact on wildlife:

The construction and presence of overhead pylons can disrupt local ecosystems and wildlife. Birds, in particular, are at risk of collision with power lines, which can lead to injury or death. Additionally, the electromagnetic fields (EMFs) generated by high-voltage power lines have been shown to affect the behaviour and health of certain wildlife species, potentially leading to long-term ecological imbalances.

Habitat fragmentation:

The installation of pylons often requires the clearing of land, which can lead to habitat fragmentation. This fragmentation can have severe consequences for biodiversity, as it isolates populations of species, reduces genetic diversity, and makes it more difficult for animals to migrate, find food, or reproduce.

Carbon footprint of construction:

The construction of overhead electricity pylons also carries a substantial carbon footprint. The production of materials, transportation, and the construction process itself involve the consumption of significant amounts of fossil fuels, contributing to greenhouse gas emissions. These emissions not only exacerbate climate change but also undermine efforts to move towards a more sustainable and low-carbon energy future. There is also the consideration of additional traffic on local B roads, many of which are already in a poor state of repair. Has the environmental impact of the wear and tear of these roads and subsequent additional repairs been factored into the overall environmental assessment?

Environmental health:

Living near high-voltage overhead pylons has raised concerns about potential health risks due to exposure to electromagnetic fields (EMFs). While studies have not conclusively established a direct link between exposure to EMFs from power lines and serious health conditions, there are some indications of increased risks.

Other reported health issues linked to living near high-voltage pylons include headaches, sleep disturbances, stress, and fatigue. These effects might be related more to psychological factors, such as anxiety about potential risks, rather than direct physical harm from EMFs. In summary, while the scientific consensus does not confirm significant health risks associated with high-voltage overhead pylons, it remains a topic of ongoing research, and precautions are often advised to minimise prolonged exposure where possible.

Agricultural productivity:

High-voltage overhead pylons can also have a negative impact on agricultural land. The presence of pylons and their associated infrastructure can lead to the loss of usable farmland, reducing the overall productivity of the land. Additionally, the electromagnetic fields generated by these pylons have been suggested to affect crop growth and soil quality, although this impact is not fully understood and requires further study. The physical presence of pylons can also interfere with farming operations, such as the movement of machinery and irrigation systems, leading to inefficiencies and potential crop damage. Moreover, the aesthetic and environmental disruption caused by pylons can diminish the value of agricultural land, affecting both its marketability and the livelihood of those who depend on it.

This reduction in local crop production has broader environmental implications. When local agricultural output declines, there is often a need to compensate by importing goods that can no longer be grown domestically. This reliance on imported food increases the carbon footprint associated with food production and distribution. The transportation of goods over long distances, often involving air or sea freight, contributes significantly to greenhouse gas emissions.

Moreover, the need for transportation and refrigeration of imported goods adds to the environmental impact, as these processes are energy intensive. This increased carbon footprint counteracts efforts to promote sustainable and local food systems, leading to greater environmental degradation and contributing to climate change. Therefore, the negative impact of high-voltage pylons on agricultural land extends beyond just the immediate area, affecting both the environment and food security on a larger scale.

We can only request that all the above is considered and mitigated during any environmental impact assessment in connection with this application and look forward to being kept informed of any further progression.

Yours sincerely



Jon Portess

Chairman – Frithville with Westville Parish Council

Fulstow Parish Council

clerk@fulstowparishcouncil.gov.uk | <https://fulstow.parish.lincolnshire.gov.uk>
The Old Cottage Main Street Fulstow Lincolnshire LN110XG

Fulstow Parish Council would like the following points included in the environmental report

- An environmental assessment of alternate sites and a full clear reasoning of why the overland pylon option has been chosen.
- A clear understanding of potential health effects of the electromagnetic fields generated by high voltage cables, which some studies have indicated can substantially increase the risk of contracting cancer.
- The expected residues and emissions including water, air and soil pollution, vibration, noise, light, heat during construction.
- A description of the likely significant effects of the development on the environment including fauna, flora, soil, water, air, climatic factors and landscape. This should cover direct and indirect effects, short, medium and long term effects, permanent and temporary, and positive and negative effects.
- A full description of the of the measures to be used to prevent, reduce and where possible offset any negative effect on the environment.
- Full details of all site access to the village during construction, including how Power Grid will minimise disruption when accessing the village. Also what measures will be taken to ensure the safety of young children walking to and from the village school.
- Fulstow roads are narrow and have blind bends which are used by pedestrians, busses, cyclists, horses, tractors, combine harvesters and other large agricultural machinery: what measures will be put in place to ensure continued full & safe use of our village roads by these groups?
- We would like to know the anticipated traffic generated by construction, the vehicle types and frequency, anticipated disruption, including noise impacts to local residents.
- The village roads are in a poor state of repair, how will Power Grid prevent further damage and erosion into the water courses?
- What measures will be put in to place to minimise disruption to local business and residents whilst construction is taking place?
- Fulstow is a farming village providing crops and animals to the UK food market. Will construction interfere with harvests and the supply of food to the UK? If so how will farmers be compensated? Some animals graze all year on land that is earmarked for pylons. What steps will be taken to house these animals during construction and what measures will be put in place to prevent the spread of TB and other diseases?
- What measures are to be taken to protect the habitats of birds of prey in the area and the migratory wildfowl? Many mature trees and hedgerows are home to many species of wild creatures, how will their habitats be preserved?
- There are many legally protected badger sets in and around the village! How will National Grid ensure these sets are not adversely impacted?
- Roman ruins were recently discovered in the area. How will National Grid preserve any archaeology?
- A clear, non-technical summary of the report should be provided.

It should be noted that Fulstow Parish Councils scoping opinions could change at any time during the process should further details which impact the village emerge at a later date.

From: [Lynda Phillips](#)
To: [Grimby to Walpole](#)
Subject: EN020036 - Grimby to Walpole Project – EIA Scoping and Consultation & Regulation 11 Notification
Date: 02 September 2024 19:59:13

You don't often get email from grimoldbyandmanbypc@outlook.com. [Learn why this is important](#)

Dear Colleagues,

On behalf of Grimoldby and Manby Parish Council I would like to suggest that all possible alternatives rather than just reasonable alternatives (Schedule 4 [2]) be investigated. This to ensure the scoping covers underground, offshore or using pylons already existing; and in addition to all aspects of Schedule 4, the scoping should also cover and address the socio-economic impact that the proposed pylon route will have on local industries such as farming and tourism and on the human population and property values within the vicinity of the development. The scoping should also take into account the human environment as well as flora and fauna.

Thank you and kind regards.

Lynda

Mrs. Lynda Phillips
Clerk
Grimoldby and Manby Parish Council

Environmental Services
Operations Group 3
Temple Quay House
2 The Square Bristol,
BS1 6PN
grimsbytowalpole@planning.inspectorate.gov.uk

CEMHD - Land Use Planning,
NSIP Consultations,
Building 1.2, Redgrave Court
Merton Road, Bootle,
Merseyside L20 7HS.
NSIP.applications@hse.gov.uk

Date: 29/08/2024

Dear Sir/Madam,

**PROPOSED GRIMSBY TO WALPOLE PROJECT
PROPOSAL BY NATIONAL GRID ELECTRICITY TRANSMISSION PLC
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2017 (AS AMENDED) REGULATIONS 10 AND 11**

Thank you for your email on 6th of August 2024 regarding the information to be provided in an environmental statement relating to the above project.

HSE's land use planning advice:

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records, the proposed DCO application boundary for this Nationally Significant Infrastructure Project falls into the consultation zones of a number of Major Accident Hazard Site ['MAHS'] and Major Accident Hazard Pipeline's ['MAHP'].

This is based on the proposed site boundary as shown in "Scoping Boundary" Figure 1.1, EN020036 Document Reference: GWNC-ARUP-ENV-REP-0003 - August 2024 ([EN020036-000017-GWPL - Scoping Report Volume 3 Figures Part A - Figures 1.1 to 8.4.pdf \(planninginspectorate.gov.uk\)](#))

The MAHS are:

- F&H Panton Bros, Stickford, Boston, HSE Ref. H4483.
- Moulton Bulb Company Ltd, Moulton, Lincolnshire, HSE Ref. H4812.
- Amber REI Holdings Ltd, Luttongate Road, Spalding, Lincolnshire, HSE Ref. H3539.
- National Grid Gas Plc, Wisbech Compressor Station, Cambridgeshire, HSE Ref. H1383.

The Applicant should make contact with the above site operators, to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident.

The MAHP's are:

- Uniper UK Ltd. Theddlethorpe Gas Terminal Control to Killingholme Reception Centre (20" section). HSE Reference 7240.
- National Grid Gas PLC. 17 Feeder Theddlethorpe / Hatton. HSE Reference 7038 / Transco reference 1309.
- National Grid Gas PLC. 8 Feeder Theddlethorpe / Hatton. HSE Reference 7036 / Transco reference 1307.

- Cadent Gas Ltd. Gosberton / Gosberton Tee. HSE Reference 6928 / Transco reference 1202.
- Cadent Gas Ltd. Midville / Candlesby. HSE Reference 6929 / Transco reference 1203.
- National Grid Gas PLC. 7 Feeder Hatton / Gosberton. HSE Reference 6910 / Transco reference 1185.
- InterGen (UK) Limited. NTS to Spalding Energy PS Pipeline. HSE Reference 11622.
- Cadent Gas Ltd. Pinchbeck / Midville. HSE Reference 6927 / Transco reference 1201.
- National Grid Gas PLC. 7 Feeder Gosberton/North Level Main Drain. HSE Reference 6905 / Transco reference 1180.
- InterGen (UK) Limited. NTS to Spalding Energy PS Pipeline. HSE Reference 11622.
- National Grid Gas PLC. 4 Feeder Kings Lynn Comp / Wisbech Nene West. HSE Reference 7463 / Transco reference 1721.
- National Grid Gas PLC. 2 Feeder Wisbech Nene West / A47(T). HSE Reference 7465 / Transco reference 1723.
- National Grid Gas PLC. 7 Feeder Tydd St.Giles / Colmworth. HSE Reference 7469 / Transco reference 1728.
- National Grid Gas PLC. 7 Feeder Tydd St.Giles / Wisbech Nene West. HSE Reference 7467 / Transco reference 1726.
- National Grid Gas PLC. 2 Feeder Kings Lynn Comp/Wisbech Nene West. HSE Reference 7458 / Transco reference 1716.

The Applicant should make contact with the above pipeline operators, to verify and inform an assessment of whether or not the proposed development is vulnerable to a possible major accident. There are three particular reasons for this:

- i. The pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.
- ii. The standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds.
- iii. To establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

HSE's Land Use Planning advice is dependent on the location of areas where people may be present. Based on the information in the April 2024 Environmental Impact Assessment Scoping Report it is unlikely that HSE would advise against the development. Please note that the advice is based on HSE's existing policy for providing land-use planning advice and the information which has been provided. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.

Would Hazardous Substances Consent be needed?

There is no indication within the Environmental Impact Assessment Scoping Report main text [[EN020036 Document Reference: GWNC-ARUP-ENV-REP-0001 - August 2024](#)] that there are hazardous materials which are likely to be in quantities where Hazardous Substance Consent will be required.

Hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of [The Planning \(Hazardous Substances\) Regulations 2015](#) as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an 'addition rule' in Schedule 1 to be applied to those substances below-threshold quantities. Further information on HSC should be sought from the relevant Hazardous Substances Authority, if required or if changes to the scheme are made.

Consideration of risk assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the Planning Inspectorate's Advice Note 11 Annex G - [Nationally Significant Infrastructure Projects - Advice Note Eleven, Annex G: The Health and Safety Executive - GOV.UK \(www.gov.uk\)](#). This document includes a section "Risk Assessments" describing the applicable legislation containing the requirement for risk assessment and the role of the HSE.

Volume 2 - Scoping Report Appendices [[Document Reference: GWNC-ARUP-ENV-REP-0002 - August 2024](#)] contains an Appendix 19A Major Accidents and Disasters Scoping table. This table describes major accident event types and their potential to impact the project, in order to determine if any hazard/event are to be proposed to be scoped into the Environmental Statement. The conclusion is that the scoping assessment does not identify any hazard/events from MAHS or MAHP (page 19A-9) that are proposed to be in scoped in. It is noted that MAHS only that fall under the COMAH 2015 Regulations have been considered. The MAHS listed in this HSE's land use planning advice which have required consent (e.g. under The Planning (Hazardous Substances) Regulations 2015 or earlier regulations). The above MAHS may have hazardous substances present below the COMAH thresholds. It will be beneficial for applicants to consider these MAHS when undertaking a risk assessment to satisfy themselves that their design and operation will meet the requirements of relevant health and safety legislation as design of the Proposed Development progresses. Note that there are no requirements for any risk assessments submitted to and approved by the relevant planning authority to also be considered by HSE.

Explosives sites:

Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk. We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely

CEMHD NSIP Consultation Team

From: [Allen, Tim](#)
To: [Grimsby to Walpole](#)
Cc: [Northfield, Andrew](#); [Midlands ePlanning](#)
Subject: HISTORIC ENGLAND ADVICE TO PINS our ref PL00796607 your ref EN020036 - Grimsby to Walpole Project – EIA Scoping and Consultation & Regulation 11 Notification
Date: 02 September 2024 19:14:48
Attachments: [image553557.jpg](#)

You don't often get email from [REDACTED]@historicengland.org.uk. [Learn why this is important](#)

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11 Application by National Grid Electricity Transmission plc (the Applicant) for an Order granting Development Consent for the Proposed Grimsby to Walpole Project (the Proposed Development)

Thank you for your letter dated 6 August 2024.

HISTORIC ENGLAND ADVICE

Dear Hannah Terry

We welcome the approach set out in the submitted Scoping Report which appears appropriate and can confirm that this reflects a positive engagement with our pre-application advice to date.

The success of the proposed ES structure and methodology in exploring likely significance effects (and those which may not meet that threshold but nevertheless be material to the decision maker) depend greatly upon the speed with which work investigations can be reflected in the emerging design process.

Archaeological prospection techniques should be appropriate both to the location and likely remains that are to be investigated, in that context bespoke strategies may be required for certain site types such as flint scatters, historic military engagements or aircraft crashes.

In particular in areas of alluviation deposit modelling is important, and in instances where cable or drainage trenching is required, consideration should be given to hydrological impacts on buried remains, potentially occurring over time following an intrusion.

It will also be important to ensure that in addition to the pylon construction and sub-station sites the ES succeeds in keeping within its scope contractors and subcontractor / suppliers ancillary facilities such as access roads, compounds and haulage yards.

We will continue to work with the applicant through the pre-app process alongside our local government colleagues.

Our HE funded work via Lincolnshire County Council on Coastal Public Houses and the Coastal Archaeological Landscape can be found via this link and will be of relevance.

<https://business.visitlincolnshire.com/resources/pub-diversification/inns-on-the-edge/>

See also our published advice :-

<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/>

<https://historicengland.org.uk/images-books/publications/historic-military-aviation-sites/>

<https://historicengland.org.uk/images-books/publications/ourportablepast/>

<https://historicengland.org.uk/images-books/publications/planning-archaeology-advice-note-17/>

<https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/#:~:text=Deposit%20models%20use%20existing%20information,archaeological%20potential%20can%20be%20identified.>

<https://historicengland.org.uk/advice/technical-advice/archaeological-science/preservation-in-situ/>

and historic sources such as

<https://archive.org/details/bookofduckdecoysx00payn/page/n7/mode/2up>

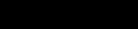
Aerial photographic sources, lidar and estate / tithe / enclosure / drainage maps.

In particular Ordnance Survey 1" maps being rather earlier than the large scale mapping can illustrate fowling and drainage feature lost by later in the 19th century.

Yours sincerely
Tim Allen

Tim Allen MA FSA
Team Leader (Development Advice)

Midlands Region
Historic England
The Foundry, 82 Granville Street, Birmingham B1 2LH

Direct Line 
<http://www.historicengland.org.uk/> | [@HistoricEngland](#)



Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.
Follow us: [Facebook](#) | [Twitter](#) | [Instagram](#) Sign up to our [newsletter](#)

This e-mail (and any attachments) is confidential and may contain personal views which are not the views of Historic England unless specifically stated. If you have received it in error, please delete it from your system and notify the sender immediately. Do not use, copy or disclose the information in any way nor act in reliance on it. Any information sent to Historic England may become publicly available. We respect your privacy and the use of your information. Please read our full [privacy policy](#) for more information.

Grimsby to Walpole Project information (**PYLON TRANSMISSION CABLE**)

Type of application: Electric Lines Name of applicant: National Grid Electricity Transmission

“The project will be a new c140km long 400kv overhead line and 5 new substations stretching from a new substation to the west of Grimsby in the north to a new substation at Walpole near Wisbech in the south. Three further substations will be built, two to the south west of Mablethorpe and one to the north east of Spalding “

Holbeach Parish Council responds as follows:

Thank you for seeking our advice on the scope of the Environmental Statement (ES), and present the opinions of our overview of energy delivery infrastructure affecting our locality in conjunction with the scoping of this project.

Firstly, may we comment that although National Grid was keen to stress that Grimsby to Walpole project which would see 140km of overhead power lines running from Lincolnshire to Norfolk are separate from the EGL 3 & 4 projects .However, both are part of the Great Grid Upgrade. However, we believe they have failed in their goal and parishioners have easily been confused with each project, and then the Outer Dowsing project along with GEI , Meridian and numerous other energy leads to misunderstanding . We feel more clarity is required as it seems like a question of “smoke and mirrors “ tactics are being used, even if not intentional.

The way we generate electricity in the UK is changing rapidly, and we are transitioning to cheaper, cleaner, and more secure forms of energy such as proposed solar arrays and more offshore windfarms. The Parish Council understand and support that, but not at any cost. We are striving to move forward, and appreciate we need to move forward, away from archaic infrastructure systems. We are somewhat at a loss as to why the alternative routing of a sea cabling network is not being seriously reviewed and believe that should be a part of the scoping evaluation.

We see “Interconnectors” cables on the Viking link and proposed link from Morrocco to Southern England and find it difficult to appreciate bringing this proposed new infrastructure onshore into our region and feel we deserve justification. We see cables replacing Pylons in some parts of the UK but find two systems sharing similar swathes underground and above ground, cost should NOT be a considered a factor because we are rural, lower density population and the cheapest option when building substations on low cost land and the effect on the local environment. Fullest evaluation needs to be PROVEN to the community.

We appreciate various technologies require different suitable options, which would include deciding whether an overhead line or an underground cable is right for a particular project and suitability of AC / DC currents. Much of this appears to be down to infrastructure costs and financial viability with little concern for the alternatives for moving power to the required areas, mostly coming from offshore and Scotland they are offshore but bringing onshore rather than down to perhaps more suitable points such as Tilbury.

Our concerns are if these projects are to ensure the supply movements due to anticipated increases by approximately 50% by 2036 then what will be the transportation requirements for 2050 when that will more than double? (source National Grid) Are these plans therefore to accommodate for

the next 10 years or 25 years or beyond and will we be looking at a replay of this expansion in a few years' time ? We are concerned and would seek information during the scoping and consultation periods for future expansion plans and the effects this would add.

During this specific ES scoping request we specifically draw your attention to our concerns relative to Development Consent for the Proposed Grimsby to Walpole Project

(Transmission by OVERHEAD Cables - PYLONS)

Potential impacts on the landscape:

We envisage concerns during the construction process whereby the workings will influence the landscape and when completed a visual impact of pylons and substations due to the predominately flat area of Lincolnshire. We have concerns also about the size of these pylons in height, far exceeding any currently in our area.

Potential impacts on natural environments:

We anticipate that the various natural life consultees will have an opinion but would like their scope to be from field visits rather than just desk based. We have an increasing and developing wildlife in the area, not just the known bird populations around The Wash area but on shore such as Marsh Harriers , Buzzards, Hawks owls as well as other animals including , deer, hares stoats and weasels with a concern for the declining hedgehog population that may be disturbed. (No we didn't forget bats and newts as we know they will be included.)

We would like concerns given to the flight paths of migrating birds.

What will be the short term and long-term effects be during construction and maturity? Ancient and modern hedgerows, and some woodland areas will be damaged and we would like to understand how this will be addressed.

Potential impacts on residents:

We believe as the routes travels through our Parish that there will be disruption to daily activities during construction period, (light pollution, dust, road closures) along with potential health impacts of living in proximity.

We have noted concerns with the effects of the EMF from overhead cables suspended from Pylons and seek to have this investigated as part of the scoping process.

We would also like to understand if these transmission cables produce pulsed electric fields (PEF) and or ELF in conjunction to the EMF, what are the potential damage to human and animal health in the short and longer term?

We understand micro shocks are a concern from overhead cables, however we know little about the effect from the underground cables?.

There are concerns for the devaluation of property, including residential, farming and commercial and appreciate these being evaluated and what conclusions would be made

Will there be a heightened risk of flooding after groundworks?

Potential impacts on businesses:

Being a predominately food production farming based region with some tourism, we request review of the loss of prime agricultural land for siting of the pylons , disruption to holiday makers during construction and reduced appeal of the region once constructed. Most certainly visual the appeal

will be limited and the countryside damaged . Could a possible consultee research tourist opinions as to their visit decision with these new features and if they would be deterred by them?

What steps will be taken to ensure that harvests can continue during construction?

Road closures will potentially influence the community and important logistics throughout the region, and we know our parishioners will have concerns on the traffic flows?

Potential impacts on existing infrastructure:

During construction there will be may large heavy vehicles on narrow country lanes, what steps will be taken to mitigate the disruption to rural transport links, damage to the already crumbling county roads. Potential for narrow lanes to subside under the weight of heavy plant possibly contaminating watercourses and causing flood risk. Who will guarantee and make payment for repairs and reinstatement as maybe required? (If Lincolnshire Highways, then additional support may be required and we would be concerned if this was not the case, and the local taxpayer burden is increased.) We would request a full survey of the road both actual visual and video recorded undertaken and minimum levels after construction as part of the ES process

Potential safety risks:

What measures will be in place during construction and beyond to mitigate the risks to workforce and residents, given that many areas are rural and emergency response times are slow?

Importantly we have many light aircraft, gliders, microlite as well as commercial and military operations within the area . Pylons are a natural concern at these heights, and we request in depth consultations to extend to all parties' recognitions.

We understand other energy production and storage may be added, such as solar arrays and BESS , some of which are already in the planning stages for approval . As these all interlinked with the National Grid Upgrade plans, we must ensure a total overview of the issues that can happen and wish to ensure the public understand these risks, however miniscule, and with these and the other issues raised, we would like everything to be considered and evaluated to avoid an Environmental catastrophe and protection and duty of care for people in our Parish.

Community Benefit Funding.(CBF)

With all the disturbances and potential issues, we are requesting to be included in the ES we would be interested to know what the community can expect during short term construction which will last for years and for long term as some form of recompense? There should be some allocation and how and where it is allocated should be considered. The community is part of the environment and therefore the request of positive benefit should be evaluated in the scoping and planning stages , even if it is not usually made, as it appears to be getting energy where it is most needed at the cost to the environmental standards of our Parishioners.

Regretfully when following the inspectorate link to the developer's website , then clicking on planning access is denied. This does not help the consultee to perform their due diligence duties screenshots attached.

Grimsby to Walpole

Project information

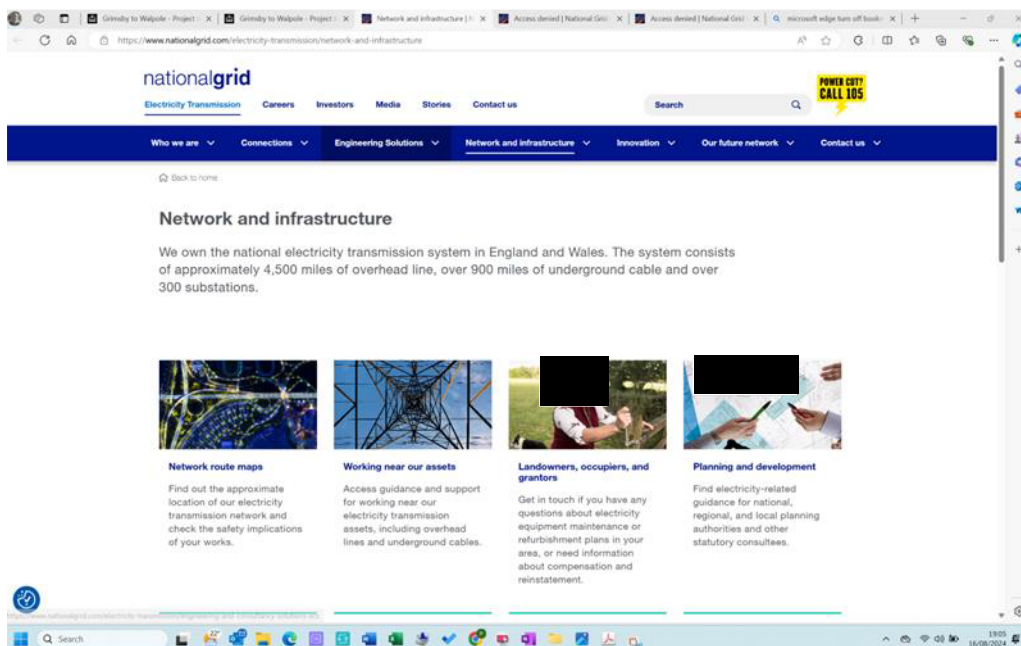
About the project

Type of application: Electric Lines

Name of applicant: National Grid Electricity Transmission

The project will be a new c140km long 400kv overhead line and 5 new substations stretching from a new substation to the west of Grimsby in the north to a new substation at Walpole near Wisbech in the south. Three further substations will be built, two to the south west of Mablethorpe and one to the north east of Spalding

[View the developer's website](#)



Access denied

You are not authorised to access this page.

[Go to previous page](#)

[Back to home](#)

From: [Huttoft Parish Council](#)
To: [Grimsby to Walpole](#)
Subject: EN020036 - Grimsby to Walpole Project – EIA Scoping and Consultation & Regulation 11 Notification
Date: 20 August 2024 09:32:52

You don't often get email from parishclerk@huttoftparishcouncil.gov.uk. [Learn why this is important](#)

I am writing to you on behalf of Huttoft Parish Council to express our collective views on the above proposed National Grid project.

Huttoft Parish Council **strongly opposes** the current proposals as set out in the EIA Scoping Report. We understand Lincolnshire County Council, East Lindsey District Council, our local Member of Parliament and many local groups and individuals have also expressed concerns over the proposed existing plans.

Local residents have provided a huge amount of feedback to Parish Councillors opposing National Grids current plans, with concerns regarding the potential negative impacts on the local community: its residents, infrastructure, businesses, tourism and agriculture. The current plans to industrialise the countryside with buildings 30m high, with an estimated footprint of 100,000 sq.m and large overground pylons (which will be seen for miles round) stretching right across the county, will have a significant negative impact on areas of outstanding natural beauty in and around the Lincolnshire Wolds and in the local area.

Huttoft has little local industry or employment and relies heavily on tourism and agriculture. The Parish Council believes the construction of the substation near Alford will severely impact the local community. Local organisations, heavily reliant on tourism such as Lincolnshire Coastal Park, National Trust Sandilands, Huttoft Car Terrace, a number of animal sanctuaries and the local public house, will all be negatively impacted by any fall in visitor numbers to the local area. The lost or damage to agricultural land across Lincolnshire also has the potential to negatively impact local food production. This will be exacerbated by many months of huge construction vehicles and machinery using the roads in and around the proposed site, that are totally unsuitable for heavy construction vehicles, the inevitable long term disruption to residents, damage to (and repair!) of roads, increased local traffic disruption, increased noise levels, increased pollution and damage to local wildlife and biodiversity.

The local community has already had to endure many years of disruption from previous schemes such as Viking Link that have caused disruption to the local community. The Parish Council believes the current proposals have been made for commercial purposes and not enough consideration has been given to minimising the impact of the local environment; especially the proposed pylons, which could be sited underground. The Parish Council is also concerned that future developments by National Grid will further increase the size of the proposed sub-station.

The Parish Council would urge decision makers to consider carefully the relevant points above and the many comments made by others before any final decisions are made.

On behalf of Huttoft Parish Council

Mark Rudd
Clerk & RFO | Huttoft Parish Council

Tel: [REDACTED]

Email: parishclerk@huttoftparishcouncil.gov.uk

Address for Correspondence:

The Red House

3 St Margarets Close

Huttoft

Alford

LN13 9RU

Our ref: 24/01388/EAISCO
PINS ref: EN020036
Please ask for: Mrs P Harris Gorf
Council Information Centre: 01553 616200
E-mail: [REDACTED]@west-norfolk.gov.uk

Borough Council of
**King's Lynn &
West Norfolk**



Date 30 Aug 2024

Stuart Ashworth
Assistant Director Environment and Planning

EMAIL ONLY

Katherine King, Senior EIA Advisor,

Dear Ms King

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (the EIA Regulations)
– Regulations 10 and 11.**

**Application by National Grid Electricity Transmission plc (the Applicant) for an Order
granting Development Consent for the Proposed Grimsby to Walpole Project**

Please find below the officer response to the above. These comments are made without prejudice.

For ease I have set out the responses arising from internal technical officer consultations received at the time of preparation of this response.

This response does not discuss matters relating to archaeology, planning for minerals and waste, broader strategic highway considerations, strategic public health, strategic flood risk and surface water management or impacts upon schools and playing fields as these matters are within the purview of Norfolk County Council.

Internal consultation responses:

Conservation Team

Thank you for consulting with the conservation team on this EIA for Cultural Heritage (Chapter 9) for the proposed NSIP known as Grimsby to Walpole Project. We have now made a site visit and have the following comments to make.

Although a relatively small part of the overall scheme, this is a sensitive area with a number of heritage assets both designated and non-designated and a landscape which is shaped by past human activity. It is important that this area of the scheme is not overlooked due to its small size.

The area under consideration is in the vicinity of the villages of Walpole St Peter, Ingleborough, West Walton and Walton Highway. There are no conservation areas present in these areas. However, we would draw your attention to the following listed buildings which are defined as Designated Heritage Assets in the NPPF. Highly graded listed buildings are marked in bold.

King's Court, Chapel Street, King's Lynn, Norfolk PE30 1EX
Tel: (01553) 616200
DX 57825 KING'S LYNN

Walpole St Peter

Townsend House	- Grade II Listed – List Entry Number 1237361
Church of St Peter	- Grade I listed – List Entry Number 1264167
Dovecot Farmhouse	- Grade II listed – List Entry Number 1237327
Greens Cottage	- Grade II listed – List Entry Number 1264180
The Old Manor	- Grade II* Listed – List Entry Number 1237330

Ingleborough

Ingleborough Mill	- Grade II listed - List Entry Number 1077675
-------------------	---

West Walton

Church of St Mary	- Grade I listed – List Entry Number 1077676
Bell Tower of Church of St Mary	- Grade I listed – List Entry Number 1171875

Walton Highway

Old Post Office	- Grade II listed – List Entry Number 1171829
Faulkener House	- Grade II listed – List Entry Number 1237331

Other Designated heritage assets such as table tombs and memorials have not been mentioned but may need to be considered. Non designated heritage assets have also not been considered here.

However, one non-designated heritage asset of archaeological value possibly equivalent to that of a Scheduled Monument and therefore covered by footnote 72 of the NPPF is;
Site of medieval moated enclosure and great house – HER Reference 2207

Consultation with the Historic Environment Record at Norfolk County Council will therefore be a priority.

The proposal is for two new converter stations adjacent to the existing Walpole Substation and a new Walpole Substation.

The EIA for Cultural Heritage is very heavily influenced by archaeology and there is very little noted as to the existing built environment. It is noted that there is a survey methodology document with the EIA which is broadly appropriate however, it should be noted that some landscape features such as Churches could have settings which are outside of the zone proposed in this statement. The Fens in the area of Walpole St Peter are not flat and buildings are often placed on the higher points which give them additional visibility. More care should be taken in considering the built environment before the final design of the route and substation locations is finalised.

The existing Walpole Substation is situated on a high point of land. The convergence of the pylon network is highly visible across the landscape and while the substation itself is well screened at points, with mature vegetation, there are clear views of it from West Drove North driving from the grade II listed building at Ingleborough House towards Walpole St Peter. The field pattern and openness close to the listed building contributes to its significance. This is considered to be a key view in the landscape.

It is also visible from Dixons Drove. From this view point the listed buildings of Ingleborough Mill and the bell tower of St Mary's church are visible within the same view. There is a clear view from the grade I listed buildings of the Church of St Mary in West Walton towards the Mill at Ingleborough and the existing substation. The church is on slightly higher ground than the viewpoint at Dixons Drove but the substation is higher. It is therefore considered to be a key view in the landscape and the visual link between the Mill and Church and open land between would be one which it would be desirable to maintain.

There is a further key view from Police Road where the Church Tower of St Peters Church, Walpole St Peter and the Old Manor House and the existing substation as well as the panoramic landscape are visible together.

The existing solar farm however, is well screened and not visible in this landscape.

The enlargement of the substation and the placement of further buildings in this landscape needs to be carefully considered. While there are few national designations for heritage, the landscape character assessment undertaken by The Borough Council of Kings Lynn and West Norfolk puts this landscape in the middle of two character areas D3: Terrington St John and D4: Emneth, West Walton and Walsoken. Both areas though share some of the same inherent landscape sensitivities; those being panoramic views across the landscape, a historic drainage network and a strong sense of tranquillity. Planning guidelines for the area should seek to preserve the predominantly rural character of the area and preserve the landscape setting of the villages.

It should also be noted that expansion of the existing substation turned up evidence of Salt working (HER REF 19694) and other salt working references such as 19693 are also present in the area. This will be a key factor to discovering the character and archaeology of the area.

The placement of more infrastructure in this area requires careful consideration of levels, landscape sensitivities, tranquillity, and historic drainage patterns and salt working as well as heritage assets and their setting.

Ecology Officer

Thank you for consulting Ecology on p.a 24/01388/EAISCO in relation to the EIA Scoping Report for the Grimsby to Walpole National Grid Upgrades. Chapter 8 relates to ecology and biodiversity.

Appendix 8A – Habitat Regulation Assessment

This section sets out the legislation underlying the Habitats Regulation Assessment (HRA) and states an intention by the applicant to provide a HRA screening report. Ultimately it is the competent authorities responsibility to produce a HRA but the screening report will provide the information required to do so. The methodology set out in this section is a standard approach and will include assessment of impacts both alone and in combination. The consideration of any impacts alone and in combination with other proposals is a key part of the HRA.

Internationally designated sites that are within 10km will need to be considered as part of the scoping exercise. Pertinent to West Norfolk is the Greater Wash SPA, The Wash and North Norfolk Coast SAC, The Wash SPA and The Wash Ramsar. These sites feature designations for a variety of habitats and species including coastal and saltmarsh habitats as well as breeding and wintering birds. The potential impacts to mobile species will be particularly relevant given the nature of the proposals and the nature of the designated features. If there are any potential impacts from air quality on protected sites this will need to form a part of the HRA scoping assessment.

Consultation with Natural England to determine appropriate survey effort to support a Habitats Regulation will therefore be a priority.

Appendix 8D Ecology Strategy

The ecology strategy breaks down the process for planning field surveys into three stages broadly summarised as preliminary surveys, detailed surveys and 'in fill' surveys. A traffic light system for ecological constraints is proposed to identify the ecological key sensitivities of the route. Where red constraints are identified it is expected that impacts will be avoided where possible to do so as this would represent highly sensitive ecological receptors. Survey radius

must be given due consideration and should be appropriate to both the species and potential size of impact. Survey radius may need to be extended where wide reaching impacts are anticipated on a certain species.

Table 8B-2 details the criteria scope for surveys. The information included within that table is detailed and sets out a reasonable approach to scoping survey requirements. Norfolk is within a District Level Licencing Area in regards to great crested newts. It is stated that a Distance Level Licence will be applied to the project. However, to my current knowledge Natural England are only able to accept developments with requirements of no more than one pond into the Norfolk scheme. The applicant should be mindful of this and prioritise early correspondence with Natural England.

Biodiversity Net Gain

Net Gain for NSIPS is not yet mandatory in England and not likely to be until 2025. However, National Grid has committed to 10% Net Gain (BNG) in Environmental value including, as a minimum, 10% Biodiversity Net Gain across all its construction projects. A BNG assessment will be undertaken and presented in a separate BNG report that will be submitted as part of the DCO application. On a large development such as this I would expect that the Biodiversity Net Gains are delivered on site.

The baseline and post development data must account for all impacts including those that are temporary, those that are necessary for health and safety i.e. construction compound locations, highways works and any other facilitating works. Irreplaceable habitat should be avoided and where it cannot be bespoke mitigation will need to be agreed with the LPA. Ecologists should be involved in the early design stages and throughout the project to facilitate early avoidance of important and irreplaceable habitats as well as to inform time scales of sensitive works. Micro sitting may be required to avoid and mitigate any impacts.

Any habitat loss to facilitate works could be felt across a wide area. When devising Biodiversity Net Gain proposals, the applicant should be mindful that the development falls within the Fenland Landscape Character Area. The Local Nature Recovery Strategy for Norfolk is not expected to be published until 2025. In the interim Kings Lynn and West Norfolk Borough Council has provided interim guidance on the Council website to guide data inputs for strategic significance. The Norfolk Green Infrastructure Mapping Project (GIMP) plays a key role in this guidance to identify important habitat networks across the county and opportunities to expand those networks. Providing the right habitat in the right place is a key focus of Biodiversity Net Gain and this interim guidance should inform any habitat proposals

Arboricultural Officer

Trees

Arboricultural Impact Assessments must be carried out, to assess the likely impact of the project on individual trees, groups, hedgerows and woodlands. as part of the project Environmental Impact Assessments (EIA) for this major infrastructure project and its associated supporting infrastructure. This will of course best be carried out in conjunction and alongside other assessments including Landscape and visual amenity, and Biodiversity, not least in relation to loss of, or impact on trees and hedges.

Landscape Character and Sensitivity

The Fens are one of England's most distinctive landscapes, defined by their low-lying flat topography, extensive drainage systems and open expansive views. The area's landscape character is particularly sensitive to change due to its simplicity and extensive panoramic views in all directions. This large-scale infrastructure project has the potential to significantly alter the visual experience and the sense of place that is so integral to the Fens. I have attached a link to our Landscape Character Assessment which defines in more detail the character of the fen landscape in West Norfolk. [Landscape Character Assessment | Borough Council of King's Lynn](#)

& West Norfolk (west-norfolk.gov.uk). It is crucial that visual impact assessments are conducted from key viewpoints, including those from settlements, roads, and public rights of way, to fully understand the extent of the potential visual impact this project may have on the landscape.

Mitigation Measures

To mitigate the landscape and visual impacts of the project, the infrastructure should be sited to minimise visual intrusion, avoiding the most sensitive areas where possible. Native planting schemes, including the use of hedgerows, shelterbelts, and woodland blocks, should be implemented to screen and soften the visual impact of the infrastructure wherever practical. This planting should be designed to enhance biodiversity and reflect the existing vegetation patterns of the Fens in West Norfolk.

Environmental Quality Service

We have been consulted in advance of a Scoping Opinion being adopted. This is in support of new overhead 400kV transmission line from Grimsby which is to terminate in the southern area of the project at a new substation (Walpole B). It is understood that the new Walpole B is to be sited close to this new Overhead Line (OHL) and the existing Walpole substation within the KLWNBC area.

The applicant has submitted an Environmental Impact Assessment Scoping Report, EN020036, ref GWNC-ARUP-ENV-REP-0001, August 2024.

Within Chapter 4 (Description of the Project) it sets out that construction works are anticipated to commence in 2029 subject to development consent being granted. Works are anticipated to last 4 years up to 2033 with re-instatement following.

Whilst the proposed new Walpole B station is to be connected to the OHL that forms this application, it will also be connected to the Eastern Green Link 3 and 4 projects. Section 4.7.5 explains that for purposes of EIA, Walpole B is to be included in both projects.

We consider that the following environmental quality matters should be considered in the Environmental Statement:

Contaminated Land

We have reviewed the Environmental Impact Assessment Scoping Report, EN020036, ref GWNC-ARUP-ENV-REP-0001, August 2024.

Contaminated land is an applicable environmental topic for inclusion in the EIA. This team are primarily concerned with regulation of human health effects and the use of sustainable approach to risk management. Relevant chapters are Chapter 11: Geology and Hydrogeology and Chapter 12: Agriculture and Soils. Chapter 11 considers potentially significant effects relating to land contamination. Chapter 12 considers effects related to soils and soil functions.

Chapter 11 refers to relevant guidance including Land Contamination Risk Management (LCRM) which provides overarching guidance on how to assess and manage the risks from land contamination. LCRM advocates a sustainable approach to land contamination risk management and emphasises that sustainability issues associated with remediation need to be factored in from the start of a project.

The study area is defined by the Project Scoping Boundary, shown in figure 1.1 which includes a suitable buffer for consideration of land and water receptors.

Chapter 11 contains an initial overview of the baseline conditions intended to establish the scope of effects that require assessment. Therefore, this is focused only on key datasets. The report states that more detailed information will be obtained and reported in the Preliminary Environmental Information Report (PEI Report) and Environmental Statement (ES). Details of

the proposed additional data gathering are provided in Section 11.8, and these appear to be adequate and to include enquiries to Environmental Protection departments at the local planning authorities. The Environmental Quality Team at BCKLWN can respond to these enquiries.

Section 11.7 sets out potential effects, taking account of proposed control measures. We support the selection of relevant receptors and the significant effects identified and scoped in. We also note the design, control and management measures proposed to mitigate effects, and which are acceptable.

The proposed assessment methodology in chapter 11.8 is in line with LCRM, and therefore reflects current good practise. In table 11.6 Magnitude of effect, a high magnitude effect on human health is defined as an unacceptable acute health risk, or a substantial chronic health risk.

1. Can the term ‘substantial chronic health risk’ be clarified in this context.

The proposed scope of the assessment set out in Table 11.8 is generally acceptable however, can the following be clarified:

2. Harm to human health from disturbance of ground affected by pre-existing contamination during maintenance is scoped in, in table 11.3 In table 11.8 this is reported as scoped out.

Throughout the document the initial outline Code of Construction Practice (CoCP), Appendix 4A Initial Outline Code of Construction Practice is referred to, which will ensure that human health is considered during construction, operation and maintenance.

We are also concerned that soils and construction materials are used sustainably. Chapter 12 refers to ‘the Management Plans’ which include a Construction Environmental Management Plan (CEMP), a Landscape and Ecological Management Plan (LEMP), a Site Waste Management Plan (SWMP) Construction Traffic Management Plan (CTMP), and Soil Management Plan (SMP) which will be produced prior to construction. The development of the Management Plans, particularly with reference to Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites will help to address this concern. The applicant should note that a revised Code of Practice is due for publication this year.

Air Quality:

Air Quality is set out under Chapter 14 of the Scoping Report.

After carefully reviewing Chapter 14 and its related sections, we would not object in general to the matters to be taken forward as within scope as summarised in Table 14.7 subject to the following comments;

- These types of development have the potential to create significant construction dust / particulate matter emissions. We would note that this risk of fugitive dust emissions is dependent on the scale (magnitude) of development and proximity to sensitive receptors. The scoping opinion refers to the latest IAQM guidance on this risk, however in Chapter 3 (Alternative Options) it mentions that the scale of this type of activity and therefore related dust and HGV emissions could be reduced if the designs were based on gas as opposed to air insulated designs. We would welcome further discussion on this but appreciate other factors and concerns from the type of gas involved.
- Furthermore, the scoping opinion in Section 14.2.2 (Legislation, Policy and Guidance) does not list the National Air Quality Strategy (NAQS, 2023). Given local authorities must have regard to this strategy, which gives it some precedent over other forms guidance. We would recommend that this is included within scope when assessing the various

outputs. For example, the NAQS includes actions on PM2.5 targets and expectation that development only emits minimum amount of pollution over its scheme lifetime. Within this Council's updated AQAP we have a specific measure (M.6.1) related to PM10/PM2.5; <https://www.west-norfolk.gov.uk/aqap-consultation>.

- We would also like to clarify within Chapter 14 Table 14.2, that as Walpole B is to be located in this Council's area that part of the overhead transmission connection must therefore also be within this Council's area. The scoping opinion (Table 14.2) only shows Fenland and South Holland affected by the southern extent of the OHL.
- Lastly, we would also like to make it clear that air quality monitoring should be considered as part of relevant dust management plans under the CEMP where the number of sensitive receptors and their proximity exceed relevant criteria according to the IAQM guidance. This should be included in scope. Dust amenity issues should be referred to colleagues in CSNN.

Please also note **Appendix A - Air Quality Case note for the Eastern Green Links 3/4**

Community Safety and Noise Nuisance (CSNN)

The proposed 500 kV Walpole B Substation has been presented following the Horlock Rules, specifically to keep noise to a minimum. At this stage the substation type is not confirmed. An AIS (Air Insulated Switchgear) substation requires a significantly large area of land (800m x 200m or approx. 16 ha, excluding access, drainage space and landscaping), although they are cheaper, easy to maintain and quicker to construct, whereas a GIS (Gas Insulated Switchgear) substation is smaller, less visually intrusive, but expensive, a producer of a greenhouse gas and has a longer outage repair time. The pros and cons will require consideration in terms of impacts on residential amenity (and other aspects).

The precise location has also not been confirmed. There are six identified possible locations (WLP1-6). The final location will be informed by technical and environmental studies and analysis of feedback from non-statutory consultees, although a location close to the existing Walpole Substation (Walpole A) is preferred. Appropriate noise mitigation measures will be considered in their designs, including plant choices, site layout, screening and enclosures.

It is noted that, subject to consent being issued in 2028, construction would likely commence in 2029, starting with accesses and construction compounds, site clearances etc and that substation construction and OHL (Over Head Line) works would continue for four years through to 2033. The location of construction compounds are to be confirmed as the project develops and will be presented in the ES (Environmental Statement). Smaller satellite compounds for welfare and storage will be required at specific work areas along the line route. Pylon work areas are stated to be around 70m x 70m. Piled foundations may be required depending on ground conditions. Where cables need to be routed underground the working land for construction ranges from 40m to 120m (and wider than 120m for joint bays where sections of cable are joined). It is noted (paragraph 4.8.24) that construction of the steelwork components of the overhead cable pylons may need to be undertaken using helicopters, and that the cables will be winched from large drums.

The maps show an overall 5 km Study Area. A Scoping Boundary has been identified. Additionally a ZoI (Zone of Influence) extending from either side of the Scoping Boundary will be used for various environmental topics, including Noise and Vibration. This has a study area of 300m, so NSRs (Noise Sensitive Receptors) in this range will be assessed with respect to construction noise and vibrations (not construction traffic on the roads). Regarding operational noise, a 1 km study area is proposed. Furthermore the ES should include information on proposed monitoring arrangements where significant residual effects have been identified, including monitoring objectives and parameters, methodology and timescales and outlined remedial actions to be taken where results are adverse.

We have no concerns over the indicative structure of (contents) of the ES.

In terms of the construction control and management measures, section 13.6.7 identifies that an Initial Outline Code of Construction Practice (CoCP) has been produced (this is within Appendix 4A). GG03, GG04, GG05, GG06, GG07, GG11, GG13, GG14, GG17, GG18, GG19 and GG25, plus AQ01, AQ03, AQ04, AQ05 and AQ06 (also GG20), and NV01 and NV02 contain measures to reduce potential impacts on residential amenity. These are all welcomed (and will form part of a CEMP and other control documents etc).

Dust impacts will be considered in the Air Quality Assessment, and Table 14.7 identifies that construction related fugitive dust emissions are to be scoped in.

Chapter 15, Noise and Vibration, states the emerging preferred corridor on which the Scoping Boundary is based is designed to avoid NSRs, where practicable. Settlements and residential areas are avoided, with a rural route which will contain small settlements and isolated dwellings being chosen. Walpole Substation comes under Section 7 of this project. The main noise sources are the traffic routes i.e. the A47, A1101 and local roads, and the emerging preferred corridor passes the villages of Ingleborough, West Walton and Walton Highway. Table 15.2 identifies that construction noise and vibrations, plus reactive operational plant like transformers and cooling plant will be scoped in. Table 15.11 also identifies the elements to be scoped in for noise and vibration assessment. Table 20.10 also includes the scoped in aspects for noise and vibration assessments. We agree all these.

It is noted that the most likely location of Walpole B, according to the graduated swathe map, is North West of Faulkner House, Walton Highway (the Eastern section of WLP5). This does appear to be easily accessible from the A47, passing the least number of residential receptors, and is as close to a similar number of dwellings as WLP4 is.

Emergency Planning Officer

I have looked through the documents and focused on the salient points relating to Chapter 19 - Major Accidents & Disasters. The scope appears to be proportionate and realistic given the nature of the proposed development. I can see no obvious gaps in areas to consider. Flood risk impacts will form part of policy examination and again I can see no areas of concern around that.

Matters of Principle:

Subsea landfall in Norfolk and undergrounding

Given the significant international, national and other environmental constraints along the Norfolk coast and land within the Borough as well as the wider county of Norfolk, National Grid will need to set out alternative options, to reduce as far as possible, impacts within Norfolk. This would include what considerations were undertaken regarding works in and around the existing site at Walpole, rather than, for instance, at other sites within Norfolk or within Lincolnshire. The area around Walpole is congested with pylons and other overground works, and to what extent can any new works be mitigated against.

Cumulative Impacts

Officers recognise that the Grimsby to Walpole NSIP Project is part of a wider project of infrastructure provision, that needs to be considered in conjunction with other National Grid and private projects for energy delivery within Norfolk and the wider region. In bringing this project forward you will need to demonstrate that there is a coordinated approach to the various initiatives impacting the region, and demonstrate that all alternative options including the reinforcement of the existing network that could deliver improvements to the network have been thoroughly investigated, rather than just relying on new lines and works. This consideration

would be in accordance with the National Policy Statement for Energy (EN1) published in November 2023 and the Electricity Networks Infrastructure (EN-5) also published in November 2023. These documents may be subject to amendment or replacement as a result of the recent change in central Government.

Although the works travel in part through this Borough, the later stages of this exercise will need to discuss what benefits, if any, will accrue to the residents and business of this Borough, as a result of these works.

Compensation and Community Benefits

In alignment with Norfolk County, this Council recognises and wishes to highlight that National Grid will need to consider appropriate compensation packages for those homes and businesses directly affected by both the construction works, and any long-term impacts. The route of any works will need to avoid any direct impacts on homes and businesses.

National Grid will need to set out clearly from the outset how local communities impacted shall have such impacts mitigated and the need for a "local community fund" to assist the wider community affected by the proposals. To this end I set out a link at the end of this paragraph to the Council's Statement of Community Involvement. As and when National Grid require a list of Parish Councils and other bodies this can be provided. [Statement of Community Involvement \(SCI\) | Statement of Community Involvement \(SCI\) | Borough Council of King's Lynn & West Norfolk \(west-norfolk.gov.uk\)](#)

Matters of Detail:

Landscape Impacts

The landscape character assessment undertaken by The Borough Council of Kings Lynn and West Norfolk puts this landscape in the middle of two character areas D3: Terrington St John and D4: Emneth, West Walton and Walsoken.

Wider Environmental Impacts

It is to be noted that there are other classified designations along the Norfolk coastline, that shall need to be considered more widely, for example the Cromer Shoal Chalk Beds Marine Conservation Zone, The Wash and North Norfolk Coast SAC, Holkham National Nature Reserve, and North Norfolk Coast Ramsar, Site of Special Scientific Interest (SSSI), Important Bird Area (IBA) and National Landscape designations.

Highway Impacts to the Borough

Careful consideration and consultation would be required to mitigate as far as possible the impacts during preparation and construction works on the road network within Norfolk, and within this Borough in particular. There would need to be detailed submissions to address haulage and construction management plans, including routing agreements, that recognise the need to minimise disturbance to the road network travelling through the Borough, during preparation, construction and maintenance works.

Yours sincerely



Stuart Ashworth
Assistant Director Environment and Planning

APPENDIX A

Air Quality Case note for the Eastern Green Links 3/4

Our ref; 24/03396

Planning ref; 24/00995/NSIP

- Overview; <https://www.nationalgrid.com/the-great-grid-upgrade/eastern-green-link-3-and-4>
- Proposals; <https://www.nationalgrid.com/the-great-grid-upgrade/eastern-green-link-3-and-4/our-proposals>
- Main consultation documents; <https://www.nationalgrid.com/the-great-grid-upgrade/eastern-green-link-3-and-4/consultation-materials>
- Main project background document; [nationalgrid.com/document/151406/download](https://www.nationalgrid.com/document/151406/download)

In summary the development proposal is for relatively large-scale construction activity within BCKLWN area for;

- **Two new converter stations and a new substation to the south of the existing Walpole Substation located within a preferred graduated swathe area;**
- *The stations are to be connected by **underground cabling** that enter BCKLWN area to the north of Foul Anchor and extend southwards into the preferred swathe areas.*

Each converter station is proposed to have a footprint of 100,000m² and height up to 30m, whereas the new Walpole substation would be larger and require land around 160,000m² with building height up to 12m. To put this into perspective the combined footprint would be around 4x the site area of the existing substation, excluding temporary construction sites and any additional battery storage systems in the area.

Both the converter stations and new substation have been identified to be located in similar swathe areas to the south of the existing substation.

At the same time but in a separate application, the National Grid is planning to upgrade its above ground electricity transmission network between Grimsby and Walpole.

According to the Eastern Green Links Project Background document (pp 22) this would result in 140km of new 400kV **overhead electricity transmission line**. As part of this upgrade there will be additional 400kV substations required, including the one at Walpole that is linked to the EGL project;

- Overview; <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/grimsby-to-walpole>

Consultation;

This Stage 1 consultation – running from Tuesday 23 April to Monday 15 July 2024 – is designed to introduce our proposals and gain your early feedback. This stage is called a ‘non-statutory’ consultation, which comes before the Stage 2 statutory consultation that we will carry out later in the process before we finalise our proposals and prepare our application for development consent. This consultation process relates only to the English onshore elements of EGL 3 and EGL 4. **The deadline to provide feedback is 11:59pm on Monday 15 July 2024.**

Air Quality;

Due the scale of the construction activity this has the potential to create dusts / particulate matter emissions that can impact sensitive receptors such as nearby residential dwellings. The NPPF states in such circumstances, that unacceptable levels of pollution is to be prevented and wherever possible to improve air quality.

By carefully selecting the location of the substations and below ground cabling this has the ability of preventing exposure in the first place and which should be a priority of any EIA.

However, where this cannot be prevented, we would expect air quality monitoring to be considered as part of the EIA under construction environmental management plans, where the number of

sensitive receptors and their proximity exceed relevant criteria according to IAQM guidance (Assessment of Dust from Demolition and Construction (2024 v2.2), Air Quality Monitoring in the Vicinity of Demolition and Construction Sites (2018)).

We would refer dust amenity issues to colleagues in Community Safety and Neighbourhood Nuisance team.

Environmental Services Central Operations,
Temple Quay House
2 The Square Bristol;
BS1 6PN

Grimsbypole@planninginspectorate.gov.uk

Ref

2 September 2024

Neil McBride
Head of Planning
Planning Services
Lincolnshire County Council
County Offices
Newland
Lincoln LN1 1YL
Tel: [REDACTED]
E-Mail: [REDACTED]@lincolnshire.gov.uk

Dear Hannah,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental impact Assessment) Regulations 2017 (EIA Regulations) – Regulations 10: application for a Scoping Opinion.

Application by National Grid Electricity Transmission for an Order granting Development Consent for the proposed Grimsby to Walpole Project (The Proposed Development)

Thank you for consulting Lincolnshire County Council in relation to the Applicant's request to the Planning Inspectorate (PINS) on behalf of the Secretary of State (SoS) for its opinion (a Scoping Opinion) as to the information to be provided in an Environmental Statement (ES) for the proposed development. The consultation was received by email on 6th August 2024.

The Council have reviewed the applicants submitted Scoping Report (SR) and make detailed comments below responding to the information provided by the applicant.

Firstly, it is disappointing that the Council has only been given a short time of 28 days to respond to this request which includes a Bank Holiday, holiday season when a lot of staff are away and at the same time the Council received a scoping request from PINS for another Nationally Significant Project in the County that requires a response in a similar timescale. Given these factors it would have been helpful to have either staggered these requests so that these were not received at the same time or provided the Council with a longer period to respond.

Notwithstanding this and recognising that this is outside of the scope of this consultation the Council would wish to put on record its objection to the proposed development on the grounds that the Applicant has yet to demonstrate that the preferred onshore option is the most necessary, efficient, coordinated and economical reinforcement of the network in this location when compared to credible alternatives such as reinforcing existing infrastructure, a sea-bed solution or underground cabling.

The Council maintain its objection (as set out in response to the applicants non-statutory consultation) to a route option that does not fully evaluate an alternative sea bed option and sufficiently balance the national need for safe, secure, affordable and low carbon energy with adverse significant effects to the local environment and the health and wellbeing of residents and communities across the County.

This objection relates not just to the proposed development in isolation, but combined cumulatively with the increasing cluster of nationally significant infrastructure projects in Lincolnshire from the 12 nationally significant sized solar parks in the west of the county to the cluster of energy infrastructure in the east which will provide the connection points from the off-shore wind farms to transfer the generated energy into the national transmission system. The Council have particular concern about the impacts of the combination impacts of these schemes on the Council's highway network. Should all of these schemes be consented the construction periods of many of the schemes will overlap. The Council is very concerned that projects are emerging in an uncoordinated way which is resulting in some communities being overwhelmed with multiple projects. Also, the associated layers upon layers of consultation combine with the fear and anxiety that they will miss an opportunity to make representations. It is not always clear what consultation is being undertaken for which project and the sheer volume of documents associated with NSIPs of this nature make it increasingly difficult for communities to engage to the extent that that would wish too.

The Council is also concerned that this project has evolved without any meaningful consultation regarding the possible alternatives such as a sea bed option or underground cable alternative. It has emerged from the Government's uncoordinated and inefficient approach to energy transmission that requires a strategic planned approach so that communities can have confidence in what is proposed represents the most appropriate option.

For the SR the applicant has made limited amendments to their Strategic Options Report (SOR) since the publication of the SOR that accompanied the non-statutory consultation earlier this year. The reasoning for discarding the offshore, underground cabling and upgrading existing infrastructure options is very limited in detail. Indeed the Council is of the view that the methodology used to justify the need for this project is flawed resulting in a significant over estimate of the energy capacity that is actually required calling into question the need for this project in its current form.

The Council has requested to see the details of the methodology that have been used to calculate the costs to justify this option and discount alternatives but to date this have not been forthcoming. The Council still maintains that an offshore alternative would be significantly less harmful to local communities and the tourism industry of this area and more closely aligned with the principles of sustainable development than what is currently proposed.

Comments on the Scoping Document

Alternatives

Schedule 4 (2) of The Infrastructure Planning (Environmental impact Assessment) Regulations 2017 states that an ES must include a description of the reasonable alternatives (e,g in terms of development design, technology, location, size and scale) studied by the developer which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option including a comparison of the environmental effects. The Council accepts the intention of the applicant to consider alternatives within the ES, and notes the assessment of strategic, route corridor and alignment options that have already been undertaken to date.

The Council expects to see a discrete section in the ES that provides details of the reasonable alternatives studied and justification for the selection of the chosen options including a comparison of the environmental effects. This should consider the decision not to pursue a sea bed option and why the whole development is for overhead lines and why sections of the project have not been identified for underground cables for example the section to the north of Louth that runs to the east of the A16 and the Lincolnshire Wolds AONB boundary.

In considering alternatives the Council requests that this includes further justification for the need for this proposed development as the capacity requirements currently put forward by the applicant (based on the most recent Electricity Statement) are assessed to be excessive and could actually be met by alternatives to this scheme.

The Council submits that using this latest data - 2023 Electricity Ten Year Statement(ETYS) there is a requirement for potentially only one new Overhead Line (OHL) across the B8 (Creyke Beck – High Marnham) and there is a 500MW deficit across B9, but this is only material once B6 issues are resolved.

With this updated data the, the Council considers the need for the Grimsby West – Walpole line is only required to support ‘local generation’ connections, i.e facilitate connecting offshore wind. This could be achieved by the following three alternatives.:

- a. Grimsby West - Walpole OHL (proposed scheme)
- b. Grimsby West – Keadby OHL
- c. Grimsby West – West Burton OHL

Given the momentous change introduced by the 2023 ETYS (which has not been considered in the Scoping Report documents) the applicant needs to review and update alternatives , providing the following clarification:

- Why did the applicants methodology not provide the correct level of investment (particularly use of 90%).
- Why it is appropriate to resolve Boundary (B)8 & B9 before the applicant has a solution for B6.
- Update analysis in line with the latest ETYS and ESO onshore reinforcement recommendations.
- Look in detail at Grimsby West – Keadby OHL option
- Look in detail at the Grimsby West to West Burton OHL option.

Project Description

The Council notes that as with the non-statutory consultation the final alignment of the proposed development, location of construction compounds, haul roads and substations are still to be confirmed and consequently a scoping route corridor is provided as the basis of this scoping request as set out at paragraph 3.6 of the main document (Description of the Project). This limits the ability of the Council to comment in detail on the scope and relevant information that should be included in the ES for the parts of the development that are proposed within Lincolnshire. To assist all involved the applicant should fix the alignment and design of the proposed development including all permanent and temporary infrastructure required for construction and operation to reduce uncertainties and to enable the Council to consider how it can contribute to the information which is relevant to the preparation of the ES. Where this is not possible the applicant should be clear about which elements of the proposed development have yet to be confirmed and assess a worst case scenario and then undertake a further scoping exercise once the final position of the route is determined.

The ES should clearly describe any changes that have been made to the final order limits boundary from the scoping report corridor including reduction or increase in extent or variation of extent and the reasons for such changes.

Cumulative Impacts

Chapter 5, section 5.5 of the Scoping Report (SR) sets out the applicants approach to the proposed assessment of cumulative effects. In relation to inter-project effects the SR explains that the first step has been to identify Zones of Influence (ZOI) for different environmental topics based on distance initially from the scoping report corridor and then later on distances from the proposed order limits. However, the Council has concerns how this is set out in Table 5.5 as not all environmental topics have a ZOI and so will not inform the initial review of other projects which may have cumulative effects. For some of the environmental topics listed the Council does not agree with the selected distance of the ZOI and submits that it should be considerably more extensive than the applicant proposes.

A significant omission is traffic and transport. This is currently based on the Scoping Boundary. The applicant notes that 'ES will be based on more detailed information relating to construction activities and transport routes, which may increase the Study Area for this topic.' However, this will be too late for the Council to influence the ZOI and is unclear as to how the applicant proposes to identify other projects which are likely to have cumulative traffic and transport effects with this project. It is apparent that for this to be based on the ZOI in table 5.5 is not acceptable. Given the location of the SR corridor and proximity to other approved, known and emerging NSIPs in this part of the County the Council expects to see an extensive geographical scope identified to capture inter-project effects, a point that is already being made in respect of the Outer Dowsing NSIP application due to commence examination in October.

In relation to agriculture and soils the suggested ZOI is 0.5km which is simply far too narrow and this needs to be extended significantly as has been suggested on other recent NSIPs in Lincolnshire. This needs to be a County wide assessment. With 22 NSIPs within the County at different stages of progression through the NSIP process all taking a proportion of BMV from relatively modest amounts to significant areas it is necessary to consider this important topic in a holistic way. Indeed, the Written Ministerial Statement of 15th May 2024 makes reference to clustering of NSIPs in certain geographical locations and gives Lincolnshire as an example. Consequently it is requested that the ZOI is extended significantly to cover the whole of Lincolnshire so that the potential loss of BMV land in the County can be looked at holistically rather than in a limited way for each individual project.

There is growing evidence that multiple NSIPs located in a relatively small geographical area has impacts on the health and well-being of local communities from the constant round of consultations and engagement fatigue that comes with the promotion of an NSIP and when this is multiplied to a number of projects in a short time period within the same geographical area the impacts on communities health and well-being can be significant. For this reason the ZOI for health and well-being should be extended to a greater geographical scope than the 500m that is currently proposed and be extended to at least 5km either side of the scoping boundary.

The Council expects to see a more rigorous evidence approach to the selection of the study area(s) used for the assessment of cumulative effects and the proposed approach of using ZOIs for only selected environmental topics is not considered to be adequate as currently presented.

Key Technical Issues

Landscape and Visual

The Council expect the production of a Landscape and Visual chapter to be included within the Environmental Statement (**ES**), in the form of a Landscape and Visual Impact Assessment (**LVIA**), which should, along with any supporting information (such as plans, photographs, visualisations or figures), reflect current best practice and guidance from, as a minimum, the following sources:

- *'Guidelines for Landscape and Visual Impact Assessment'*, (**GLVIA3**), April 2013 by the Landscape Institute (**LI**) and Institute of Environmental Management and Assessment (**IEMA**);
- *'An Approach to Landscape Character Assessment'*, Natural England (2014);
- *'Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals'*, 17th September 2019 by the Landscape Institute (**LI**);

- *‘Technical Guidance Note (TGN) 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)’*, 10th January 2020 by the Landscape Institute (LI);
- *‘Technical Guidance Note (TGN) 04/20 Infrastructure’*, April 2020 by the Landscape Institute (LI); and
- *‘Technical Guidance Note (TGN) 2/21 Assessing landscape value outside national designations’*, May 2021 by the Landscape Institute (LI).

Overall, the Council expect that the assessment of potential Landscape and Visual effects and evolving proposals relating to the scheme, as a Nationally Significant Infrastructure Project (**NSIP**), follow an iterative process of engagement and consultation to ensure the following are not fixed at this stage and are discussed, developed and agreed at subsequent technical meetings with the Council and other appropriate stakeholders:

- LVIA Methodology;
- Development, and subsequent ZTV, parameters;
- Study Area extents (distance);
- Viewpoint quantity and locations;
- Photomontage/Accurate Visual Representations (**AVRs**):
 - Quantity and location;
 - Phase depiction;
 - AVR Type and Level.
- Mitigation Measures/Landscape Scheme/Site Layout;
- Cumulative effects, including surrounding developments to be considered; and
- The extent as to which a Residential Visual Amenity Assessment (**RVAA**) should be considered (based on the Landscape Institute TGN 2/19) if there are residential properties with receptors likely to experience significant effects to their visual amenity.

While the focus of this review is on Landscape and Visual matters, other information provided within the report, and any associated Appendices, has also been considered, providing background and context to the site.

The following should be considered in the evolving assessment and layouts:

Methodology

As stated above, the LVIA should be carried out in accordance with GLVIA3 and associated guidance, and undertaken by suitably qualified personnel. The overview of the proposed methodology provided at *Sections 6.8* (landscape) and *7.8* (visual), along with separate landscape and visual methodologies provided within *Appendix 6A (landscape)* and *7A (visual)*, are typical of those used for ES Chapters where potential significant effects can be considered and reflects the guidance in GLVIA3.

The approach to identifying whether an effect is significant or not significant in *paragraph 5.4.11* is appropriate and should be utilised for the LVIA to ensure consistency. The Council would request that the most up to date technical guidance be used and the methodology is further interrogation and commented upon at the next phases of the project.

Separate landscape and visual methodologies have been provided, and this approach creates the likelihood of duplicating information, and the Council request this is considered and any duplication minimised to assist with minimising the volume of information produced, which if excessive can lead to issues with being able to understand the key matters.

Scope of the Study Area

It is acknowledged in *Table 5.5, paragraph 6.4.6* (landscape) and *7.4.6* (visual) that a preliminary landscape and visual study area of 5km has been allowed for. At this early stage, the Council recommend these extents are discussed and further reviewed as the full extent of potential visibility of the development is not yet fully known, and there is the potential that visibility beyond these study area extents may ultimately be identified. However, *paragraphs 6.4.7* and *7.4.7* identify that a 10km distance ZTV will be produced, which will aid this process. It would be beneficial to share this with consultees at an early stage of the project to facilitate a review of this information and subsequent discussion.

Once the study area has been defined through further consultation, the LVIA should provide a clear justification and narrative for the full extent/distance, which would be further refined as part of the iterative process.

Landscape

A Landscape chapter (*chapter 6*) is presented within the scoping, separate to the visual chapter (*chapter 7*), and it is proposed that separate landscape and visual chapters are included within the ES. While this is not typical, as landscape and visual are usually dealt with within one LVIA chapter as they are interlinked issues, it is important that an LVIA must assess and clearly distinguish between the two. Therefore this approach does provide a clear distinction. However, this does also present a potential that considerable amounts of duplicate information would be included within each separate chapter in regards to

consultation, site description, policy, some baseline information etc. The Council would suggest that if separate chapters are taken forward, efforts are made to reduce duplicate information as consultees or interested parties will likely be reading both the landscape and visual chapters, which along with associated appendices are likely to be substantial documents. The Council would encourage succinct and focussed chapters within the ES, with clear narratives to aid the readers understanding of the likely key landscape and visual issues. Appendices can be utilised to contain more detailed information.

A range of published landscape character assessments have been identified in *paragraph 6.5.1*, from National Landscape Character Areas to regional and local assessments. *Paragraphs 6.5.36 to 6.5.41* identify designated landscapes within the initial study area, most notably the nationally designated Lincolnshire Wolds AONB to the west of the scheme, and locally designated AGLV which lies to the north of the AONB.

To align with GLVIA3 the LVIA should include an assessment of landscape effects at a range of scales and needs to include both relevant published landscape character assessments and the LVIA authors own judgements of the landscape character of the site and study area. This should potentially include a finer grain landscape character assessment that considers individual landscape elements or features that make up the wider character.

Table 6.2 identifies potential landscape receptors and scopes several out of any further assessment. While this is an appropriate approach, at this stage due to the potential design changes through the pre-application period the Council cannot confirm agreement with these, and suggest they are re-visited and re-evaluated once the scheme is further developed and are retained in for the present time.

Visual

Refer to comments above under Landscape for statements regarding separate landscape and visual chapters.

A range of landscape character assessments are identified within *paragraph 7.5.1*, which will have some bearing on the visual baseline, however these are more aligned with the landscape baseline (*chapter 6*), and has the potential for duplication of information, which the Council would urge is minimised with already likely very large documents.

Sensitive receptors are discussed from *paragraph 7.5.5*, and while more sensitive receptors are often the ones that experience significant effects, the Council would expect all potential visual receptors be considered initially as these will feed into the evolving design and layout and less sensitive receptors may ultimately have significant effects, therefore the consideration of these should be included to aid clarity and ultimately transparency of the assessment. Several sensitive visual receptors are identified in *paragraphs 7.5.6 to 7.5.8*. However, at this early stage of the project the Council request that the potential visual receptors are reviewed, refined and consulted upon further once proposals have been developed: the Council are not in a position to confirm our agreement of their inclusion or omission at this stage.

Paragraphs 7.5.10 to 7.5.40 provides an overview of the current visual amenity, however the focus is on NCAs and the future baseline, which will have some bearing on the visual

baseline, but is more aligned with the landscape baseline and is on the whole a duplication of information previously presented in *chapter 6*, which we would urge is minimised.

Section 7.6 appears to be predominantly a repeat of information provided within *chapter 6*.

Table 7.2 identifies potential visual receptors and scopes several out of any further assessment. While this is an appropriate approach and it is likely these would not experience adverse effects (such as beyond 10km), at this stage due to the potential design changes through the pre-application period the Council cannot confirm agreement with these, and suggest they are re-visited and re-evaluated once the scheme is further developed. The scoping out of sensitive receptors should be clearly acknowledged within the LVIA to demonstrate they have been considered and brief reasoning for exclusion.

The Council would expect that the visual assessment would clearly identify the visual receptors, which would subsequently be the focus of the visual assessment, including extents of views and potential sequential views along linear routes (such as footpaths or roads). The LVIA should not just contain an assessment of any agreed viewpoints as these represent static views from specific locations, it must also focus on receptors with potential views and the experience of these receptors. The viewpoints are to illustrate the visual effects, and the visual assessment should clearly reference receptors to representative viewpoints to aid this.

As clarified in *paragraph 7.9.6*, the visual assessment should take account of the 'worst case scenario' in terms of winter views, and effects at construction, Operational Phase (year 1), Residual Phase with mitigation planting having established (10 to 15 years), and at any Decommissioning Phases.

Viewpoints

The final locations of viewpoints are to be reviewed and agreed with the Council and other relevant stakeholders. The final viewpoint selection should also consider views of taller and more conspicuous elements, once the scheme layout is more developed, as well as consider potential key, or sensitive, viewpoints or visual receptors. The Council would welcome an initial discussion and subsequent workshop (on site if appropriate) with the applicant's team in regards to proposed viewpoints.

Photomontages

To gain an understanding of the visibility of the scheme and how the development would appear in the surrounding landscape, Photomontages/AVRs should be produced. The number and location of the agreed viewpoints to be developed as Photomontages/AVRs should be agreed with the Council and other relevant stakeholders and produced in accordance with *TGN 06/19 Visual Representation of Development Proposals*. At this stage, it is deemed appropriate that these should be produced to illustrate the proposals at different phases: Existing Situation (baseline), Operational (year 1) and Residual with planting established (10 to 15 years). The Photomontage/AVR Level and Type is to be discussed and agreed.

Cumulative impacts

Cumulative Landscape and Visual effects should be assessed in regards to other major developments, and in particular similar energy infrastructure or renewable energy developments, as appropriate in regards to proximity and scale. This should consider both Combined (in same view) or Sequential (when the observer has to move to another viewpoint to see the same or different developments) effects.

Residential Visual Amenity Assessment

Paragraph 7.8.7 identifies that a “Residential Visual Amenity Assessment (RVAA) will be undertaken from any properties where the occupants are likely to experience major adverse visual effects”. A 400m study area is appropriate for carrying out the RVAA, however the Council would also expect that initially a Residential Visual Amenity Survey is carried out to identify any properties that are either within the 400m study area or, if beyond this, if the receptors within the properties have potentially clear, open and direct views of the scheme, particularly of larger elements such as the sub-stations. This survey should initially guide the design proposals and subsequent hierarchy of mitigation to embed primary mitigation in the scheme with the aim to avoid any adverse visual effects from these receptors where possible, not just those identified as potential major effects (and subsequently would meet the threshold for a RVAA).

Mitigation and Layout

As this is an iterative process, at this early stage it is not relevant to comment on any potential mitigation or layout of the development. However, best practice guidance, relevant published landscape character assessment’s and Local and County Council Policy and Guidance shall be referred to and implemented as appropriate.

The Council would also expect the landscape and planting scheme is coordinated with other relevant disciplines, such as ecology, heritage or civils (e.g. SuDS features), to improve the value of the landscape and reflect appropriate local and regional aims and objectives. Planting should be well considered and not just placed to screen proposals, as this may have a negative effect such as appearing out of character or foreshortening open or panoramic views. A Landscape Scheme and associated Outline Landscape and Ecological Management Plan should accompany the ES which should cover as a minimum the establishment period, which is assumed would be up to 15 years to cover the period up to the residual assessment.

The management plan should provide for both new planting and existing retained vegetation and how it will be managed and protected through all phases of the development. Any vegetation loss to facilitate development, including access and wider highways works or abnormal vehicular routes for construction, must be clearly identified in the submission.

Public Health

Chapter 17 – Health and Wellbeing:

The Council note this Chapter is to be based around the published new guidance from the Institute of Environmental Management and Assessment (IEMA) on assessing human health

as part of EIA. The Council support Norfolk County Council's call for a full health impact assessment, including a mental health impact assessment. Irrespective, Public Health would like to be part of a team looking at human health impacts for both mitigation and positive health and wellbeing opportunities.

The Council agree with the interrelationship with other Chapters and the health impacts, positive and negative, from these Chapters should be drawn together into Chapter 17.

- Chapter 7 -Visual: which covers effects on residential properties and recreational, tourism and community visual receptors and their impact on human receptors including the ability to enjoy open space and recreational amenities.
- Chapter 11 Geology and Hydrology: which covers contamination sources and potential remediation effects following construction activities.
- Chapter 13 Traffic and Movement: which covers effects on accessibility, active travel, use of Public Rights of Way (PRoW) because of construction traffic.
- Chapter 14 Air Quality: which covers air quality effects following construction activities and traffic and their impact on human receptors.
- Chapter 15 Noise and Vibration: which covers noise and vibration effects following construction activities and traffic and their impact on human receptors.
- Chapter 16 Socio-economic, Recreation and Tourism: which covers impacts on community land and facilities, commercial property and land, and employment creation, as well as effects on recreational, tourism and community receptors including the ability to access open space and recreational amenities

The Study Area comprising the wards in which the Project is located and residential, community and healthcare facilities and open spaces within 500 m of the Scoping Boundary is considered appropriate. Demographic and health profiles within these wards should be looked at and the Chapter written with these in mind in the context of the Project.

The presence of several Nation Cycle Network Routes (NCNRs) and Long-Distance Footpaths (Nene Way (Via Wisbech), MacMillan Way (Boston to Abbotsbury), MacMillan Way (Cross Britain Way), Water Rail Way (Boston to Lincoln); Lindsey Loop (Lincolnshire Wolds), and Johnson Silver Lincs Way (from Grimsby) and the King Charles III England Coast Path, North East Route, Skegness to Mablethorpe) is noted. These must be maintained both through construction and if possible enhanced during operation through new connecting routes to local towns and villages, particularly into deprived wards with limited green space and few Public Rights of Way (PROWs).

Open spaces within the scoping boundary and within 500m of the scoping boundary should be maintained, enhanced, and connected if feasible through the cable corridor.

Opportunities should be taken to create a green corridor through tree and hedgerow planting along the cable route to improve biodiversity and connection between habitats for species and humans to travel (active travel). The Project will have the potential to support

the emerging Greater Lincolnshire Nature Recovery Strategy if it goes ahead. Such enhancements could also improve public access to open spaces which is poor in Lincolnshire.

The impacts, receptors and potential for significant effect that are scoped in are appropriate. However, the Council **disagree** scoping out the effect of Electromagnetic Fields. It is important to assess these, together with the effect of the English Onshore Scheme (underground cabling), infrastructure associated with both that and this Project, and other electricity generating infrastructure that may be approved or proposed in the vicinity.

The mental health effect on residents could be considerable even if individually the exposure limits are below those set by the International Commission on Non[1]Ionizing Radiation Protection (ICNIRP) guidelines. The impacts in this table are negative ones and the potential for positive enhancements to benefit population health and wellbeing should also be scoped in.

Surface Water Drainage

Lincolnshire County Council is the lead local flood authority for the part of the proposed development that is situated within Lincolnshire.

The Council is satisfied with the proposed assessment methodology in “Chapter 10 Water Environment” of the ES Scoping Report and should provide a suitable Flood Risk Assessment and Drainage Strategy to review whether the impact on surface water flood risk of the scheme is acceptable or not.

Traffic and Transport

The Council is the local Highway Authority for the part of the proposed development that is located within Lincolnshire,

The Council is satisfied that Chapter 13 Traffic and Transport” includes an acceptable proposed scope and methodology for the Transport Assessment. Notwithstanding these comments until the developer can provide details relating to the final route alignment, location of construction compounds haul roads, site access points, phasing, construction methodology and traffic flow data the Council is limited in its ability to comment further of the potential impacts to the local highway network for the purposes of the Environmental Statement.

Despite a continued objection to the proposed development the Council will continue to engage with National grid on the preferred route corridor and sub-station locations as proposed to ensure the impacts are fully understood and the ES includes best practice embedded and appropriate mitigations to reduce adverse impacts.

Ecology

Matters relating to ecology and biodiversity are covered in Chapter 8 of the Grimsby to Walpole Environmental Impact Assessment Scoping Report dated August 2024. Having reviewed this and other sections of the report relevant to ecology and biodiversity, subject to the comments below, the Council agrees with the approach to the assessment of ecological impacts.

Study Area

The Council agrees that the study area and associated Zones of Influence for ecology are appropriate.

Baseline Conditions

A suite of important ecological sites ranging from internationally designated sites to locally important sites have been identified either within or in the vicinity of the study area. The Applicant will need to identify potential impact pathways for these sites and their interest features and present an analysis of potential impacts, along with associated avoidance and mitigation measures at PEIR stage.

Desk based studies have also indicated the presence of a range of habitats and species / species groups within the study area based on desktop studies and information obtained from local records centres. The list of habitats and species appears to be fairly comprehensive. Surveys to establish the precise locations of these habitats and presence / absence of species will be required to identify any impacts and to inform mitigation and enhancement opportunities.

8.5.1.2 states that three area of ancient woodland have been identified within the Scoping Boundary and that further areas are present within the 2km Study Area. The Council advises that ancient woodland data for the county is currently being 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 is being used to assess impacts including from field surveys commissioned in support of the application.

The Council notes that initial winter bird surveys were carried out over the winter of 2022/23. Additional surveys are likely to be required to accurately assess the potential impact of the proposal on wintering and migratory bird populations using or passing through the area.

Scope of the assessment

The Council agrees with the list of potential ecological receptors presented in table 8.4. The Council considers that it is premature to scope issues relating to potential impacts on species out at this stage until more information on species presence / absence and distribution has been obtained via the proposed program of field surveys.

Expected survey requirements

A list of proposed ecological surveys set out in Table 8.5 and the Council notes that surveys will follow best practice guidance.

Wintering Bird Surveys

Given the presence of a suite of ecologically important sites designated for their importance for migratory bird populations in the vicinity of the proposal, the Applicant will need to ensure they have access to sufficient data to determine potential impacts on these populations. Consideration should be given to the frequency of surveys and appropriate timing of surveys during the year including at different times of day and states of the tide to detect areas outside the designated site boundaries used by birds i.e. Functionally Linked Land. Wintering bird surveys should also cover more than a single year to help ensure that results are not skewed by any particularly harsh weather patterns.

In addition to the above, ornithological surveys will need to be designed to understand the potential impact on migratory routes across the landscape. This will include collecting information on both numbers of bird movements as well as flight directions and heights across the area to understand the risk of collision with the pylons and lines. It is also important to ensure that both nocturnal and diurnal movements are considered. The use of vantage point surveys and transect surveys, using night vision equipment and potentially radar surveys may all be necessary to gain a full picture of the potential impact along the full length of the proposal.

Assessment of Cumulative Impacts and Effects

The requirement for assessment of cumulative effects is covered at 5.5. There are several development proposals of varying scales in the vicinity of this proposal. These range from small scale housing developments to NSIP scale energy developments. The combined implications for habitat loss, land-use change, and associated impacts on species will need careful consideration in the final DCO application.

The Council agrees with the proposed outline methodology for the assessment of cumulative effects related to ecology as set out in Chapter 5.

Habitats Regulations Assessment

Given the potential for impacts on statutorily designated sites, the Applicant should provide the information reasonably required for a Habitats Regulations Assessment. The approach to this matter set out in Appendix 8A appear appropriate. The Planning Inspectorate will need to undertake a Habitats Regulations Assessment and satisfy itself that sufficient information has been submitted by the Applicant to enable this to be completed.

Biodiversity Net Gain

LCC notes and welcomes commitments made in 1.9.1 to 1.9.3 relating to delivering “...at least 10% gain in environmental value (including biodiversity) on all construction projects by 2026.”. Given the scale of the proposed development the Council will expect the project to deliver significantly in excess of 10% BNG.

No details of how any gains will be achieved are presented at this stage and the Applicant will need to ensure that habitat surveys are carried out to appropriate standards to allow the population of the Statutory Biodiversity Metric and calculation of the level of gains achieved. The current best practice method for this is set out in the Statutory Biodiversity

Metric User Guide. A MoRPH assessment will be required to calculate baseline river units where watercourses (with the exception of ditches) are present in or adjacent to the proposed DCO boundary.

The Council encourages the Applicant to work with other developers and stakeholders in the area to identify opportunities to deliver BNG strategically including by keeping up to date with emerging local strategies such as the Greater Lincolnshire Local Nature Recovery Strategy.

Commitments to deliver BNG will need to be secured in the DCO and the Applicant will need to demonstrate that the commitments made to delivering BNG are achievable.

Future engagement and consultation

The Council welcomes the Applicant's intention at 1.10.11 to establish Technical Working Groups and confirms that LCC's Infrastructure Ecologist will be happy to engage in this process.

Cultural Heritage

The Council is generally supportive of the approach towards Cultural Heritage but is concerned by the lack of field evaluation proposed. Without the standard archaeological suite of evaluation, that is desk based work followed by a reasonable programme of geophysical survey and trial trenching, there will be insufficient baseline evidence for effective mitigation either by design or by archaeological recording techniques as proposed (sections 9.6.1-3). The Council is pleased that the Applicant has begun the process with effective communication and a commitment to engagement.

This scheme will result in significant impacts across the length of Lincolnshire and the developmental impacts will be considerable. There will undoubtedly be currently surviving archaeological deposits across this scheme and impacts upon them will be permanent and detrimental unless they are adequately mitigated. Fit for purpose proportional mitigation requires sufficient baseline evidence therefore the Council is particularly concerned with the proposed limited approach to evaluation targeting only known high risk and areas of greatest potential.

This also goes against the advice of Historic England which is included in this scoping report in Table 9-1: Engagement with Stakeholders: 'With regard to assessing archaeological potential of the emerging preferred corridor, it was noted that the landscapes crossed by the emerging preferred corridor can appear relatively 'blank' (e.g. in the Fens), but this is a function of a lack of previous investigation rather than an absence of archaeology. A failure to adequately investigate could result in significant discoveries only being encountered at a point when mitigation options are restricted due to the lateness at which they are encountered, which may result in delays to project timescales and increased costs.' The corresponding consideration in the Scoping Report section of the Table states that 'The point regarding 'blank' areas is well made and the archaeological surveys will be informed by the assessment of archaeological potential within the Scoping Boundary and will target both 'blank' areas and areas of know archaeological potential.'

The scoping report itself and the associated Appendix 9B Heritage Survey Strategy do not reflect the above response. Instead, what is proposed is a phased approach of increasingly limited focusing of desk based work, geophysical survey and trial trenching to areas where archaeology has already been identified. While this would inform the mitigation strategy for those areas where archaeology is already known, this would create an increasing degree of confirmation bias in the resulting evidence base. The lack of information anywhere else increases the risk of unexpected archaeology being identified during the work programme.

Section 9.6 Design and Control Measures states that *'The Project design will avoid physical impacts to designated assets. As this design develops further and is better refined, additional mitigation measures will endeavour to include further design intervention to avoid direct and indirect impacts on both designated and non-designated heritage assets'* (9.6.1) and that *'Potentially significant impacts on the setting of assets brought about by the Project may be lessened or avoided through consideration of the detailed design and micro-siting of the individual pylons.'* (9.6.2)

The Council supports this approach. However, note that sufficient site-specific evaluation will be required in order to provide the baseline evidence necessary to achieve this approach given the high potential for currently unknown surviving archaeology to be impacted by the development works.

Section 9.6.3 states that *'Where the Project will bring about physical impacts to heritage assets, these effects will be mitigated through measures to include (but not be limited to) detailed landscape/topographic survey, archaeological excavation and recording and archaeological monitoring/watching brief.'* As above the Council is pleased with this approach, again sufficient evaluation will be required in order to achieve this.

Section 9.6.5, point H02 states that *'Where a previously unknown heritage asset is discovered, or a known heritage asset proves to be more significant than foreseen at the time of application, the project will inform the local planning authority and will agree a solution that protects the significance of the new discovery, so far as is practicable, within the project parameters.'*

The Council requests clarity as what specifically is meant by 'as far as is practicable' as this will have a significant impact on whether what is proposed is a reasonable approach to dealing with damage and destruction of surviving archaeology as a direct result of developmental impacts.

While an iterative approach is to be embraced there is a need for establishing clear and agreed acceptable minimum requirement parameters. If agreement on what work is required is left entirely to be determined during site meetings there is a risk of increasing multiple delays during the work programme if agreements cannot be reached or site visits are delayed due to work pressures or staff shortage.

Section 9.7.3 states that *'A precautionary approach has been taken and where there is no strong evidence base, insufficient baseline or the significance is uncertain at this stage, the impact has been scoped into the EIA.'* The Council supports this approach, however it does not seem to be reflected in the increasingly directed focus of direction of the proposed evaluation measures.

Regarding Potential Impacts, section 9.7.5 states that *'There is the potential for the Project to give rise to significant effects on those nondesignated assets that remain extant within the Scoping Boundary.'* There is however no mention of unknown currently surviving archaeological deposits within the Scoping Boundary or how these non-designated assets will be adequately assessed to determine their presence, depth, extent and significance.

Regarding the Proposed Data Sources (section 8.9.7) the Council also recommend that Portable Antiquities Scheme (PAS) data be included.

Section 9.8.9 states that *'In addition to the desk-based assessment it is proposed that the historic environment ES chapter is also informed by the results of: an aerial photographic and LiDAR assessment; geophysical surveys; geoarchaeological deposit modelling and monitoring; and where appropriate trial trench evaluation.'*

The Council agrees that this scheme should include these essential prospection techniques which will be essential for the provision of sufficient site-specific baseline evidence to inform the proposed mitigation measures through design and archaeological fieldwork.

In respect of Appendix 9B: Heritage Survey Strategy.

Section 9B.2.4 sets out the general approach and mitigation through good practice measures, concluding with: *'In defining the scope of field survey, the strategy has considered where the commitment to these measures will avoid likely significant effects upon sensitive heritage assets.'* This approach would be effective where heritage assets are known and their significance has been determined. It will not work where evaluation has not been undertaken to establish the archaeological potential.

The Council agree with section 9B.2.5 which states that *'The strategy also acknowledges that, even where features are avoided or standard mitigation measures are adopted, there may continue to be a risk of impacts to the historic environment. Therefore, the avoidance measures alone are not sufficient to rule out surveys.'*

Section 9B.2.8 states that *'Data gathering will need to be undertaken on a staged approach in order to focus on priority areas indicated by high heritage significance or intrusive design.'* This is concerning as to focus entirely on learning more about what is already known is to leave a very high degree of risk to the rest of the impact zone.

Section 9B.2.10 is also of concern, stating that *'This stage of data gathering will focus on existing information which can be collected and further analysed as necessary, with limited use of new data gathered through nonintrusive survey.'* Limiting non-intrusive desk based work to only looking further into what is known will exponentially increase the degree of risk for unassessed unknown surviving archaeology to be hit during the work programme resulting in either damage or destruction of archaeology or impacts on the work programme.

Section 9B.2.10 states that *'Initially, searches of existing heritage databases will be undertaken to provide a basal understanding of the historic environment and to identify key constraints. This information will also be critical in highlighting current data gaps and crucially in informing on the potential for currently unknown archaeology to exist within the Study Area and the likely significance of this.'*

Unfortunately database searches will be by their very nature of negligible use in finding unknown archaeology.

Another purpose of the desk-based work above is to *'generate a risk model for archaeological potential to be aligned against the specific works.'* All of the Lincolnshire NSIPs have found unexpected archaeology in so-called 'blank' areas where previous evaluation techniques have not found archaeology. For example Heckington Fen NSIP most of the archaeologically sensitive areas identified for mitigation were found solely through trenching results. The Council will therefore be very interested in the risk model and how it is informed.

Section 9B.2.19 states that *'Reference will also be made to the regional research agendas with fieldwork focused on those areas where specific questions can be answered, rather than undertaking a widescale data collection.'*

What is lacking in this approach is the mitigation of the impact of the development upon surviving archaeology. This is a very large scheme with the potential for very large impacts. If assessment is not proportional to its potential impact then there simply cannot be proportional mitigation of the damage and destruction of this scheme on archaeology, which is a non-renewable and irreplaceable resource.

The impacts of this scheme will be considerable and sufficient field evaluation is an essential aspect of effective project management, particularly as unevaluated areas of unknown archaeological potential leave a high degree of risk to the development. Failure to adequately evaluate the site at the application stage could lead to unnecessary destruction of heritage assets, potential programme delays and excessive cost increases that could otherwise be avoided.

The Council look forward to working with the Applicant to inform the proposed phased approach in a balanced way that recognises the degree of assessment necessary in order to adequately inform the process.

To manage archaeological effectively the proposed piecemeal approach to geophysics (sections 9B.2.21-23) will require detailed and informed understanding of any areas within the Order Limits proposed for exclusion. Baseline evidence will be necessary to prove that archaeological potential is negligible for any area proposed for exclusion from geophysical survey.

Section 9B.2.24 states that *'Intrusive fieldwork will only be undertaken where further information is needed to define the significance of the archaeological resource to inform the assessment phase.'* Blank areas of unknown archaeological potential will remain unknown and again risk will increase with every phase and technique of archaeological evaluation that passes it by through the NSIP examination process.

The resulting very high level of risk will then be pushed entirely into the work programme where all of the unevaluated blank areas will continue to have unknown unassessed archaeological potential. This will mean that groundworks for the development will need a sufficient degree of archaeological supervision to identify, stop work and mitigate each archaeological impact appropriately with corresponding impacts on the schedule and budget, or that currently surviving archaeology within the impact zone will be impacted by

the development and not recognised or preserved by archaeological record. There is no public benefit in the destruction of currently unknown heritage assets.

The Council do not agree with this approach, it is against national policy and guidance and professional standards where reasonable steps are taken to identify potential as well as known archaeology and for the evaluation phases to inform appropriate and fit for purpose mitigation.

The National Policy Statement for Electricity Networks Infrastructure (EN-5) states that **'Applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders...to "have regard to the desirability of...protecting sites, buildings and objects of architectural, historic or archaeological interest; and...do what [they] 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.'**"(2.2.10).

Sufficient information on the archaeological potential 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 which must be submitted with the EIA.

The EIA will therefore 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 minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation.

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)).

Built Heritage

The Council appreciate the proposed extension of the study area for heritage assets as outlined in the scoping report. While acknowledging the necessity for a more detailed study area in the Environmental Impact Assessment (EIA), the Council believe that determining the study area based on the asset's significance and the project's potential impacts will require careful and transparent negotiation. The process for defining this study area, as mentioned in 9.4.3, is currently unclear. At this stage, the Council advocate maintaining the existing 5km study area for the EIA until further clarity and consensus are achieved.

The Council acknowledge and appreciate the efforts made to identify heritage assets within the study area. However, have concerns about the rationale behind adopting the 1km and 3km study areas for heritage assets, particularly for above-ground assets. The methodology for reducing the study area from the initial 5km (as referenced in Chapter 7, Visual, Section 7.4.4) to 3km and 1km requires further clarification—especially considering that the 50m tall pylons are assumed to have a maximum visibility distance of 10km. Therefore, the

Council cannot support the reduction to 1km and 3km study areas for heritage assets at this stage. The Council strongly advocate for maintaining a fixed 5km study area for all heritage assets within the emerging preferred corridor.

The proposed 1km core Study Area for non-designated heritage assets is insufficient for a thorough assessment of potential impacts, particularly for the setting of above-ground assets. The effect of the pylon infrastructure will extend well beyond 1km, especially in open landscapes where the setting of heritage assets can be significantly altered. A narrow 1km boundary risks underestimating these effects and the potential harm to these receptors. To ensure a comprehensive evaluation, the study area should be extended to 3km for non-designated and 5km for designated heritage assets. This broader range would better capture the true extent of potential impacts on heritage assets.

Please see the following guidance documents specific to Lincolnshire:

[The Historic Landscape Character Project for Lincolnshire \(online\)](#)
[Greater Lincolnshire Farmsteads Characterisation](#)

EIA Scoping Report Appendices:

Clarity is needed over whether the avoidance measures will also consider non-designated built heritage.

The Council welcome the work already undertaken in collating the Heritage Asset Gazetteers; however, for ease of reference, it would be helpful for these schedules to include the distances for each receptor to the development.

Socio-economic (including Agricultural Land Classification)

The Council welcome the inclusion of a range of non-statutory consultees in the development of the EIA. The Council recommends this list includes local skills providers, both public and voluntary sector providers. These may include; Boston College, Grimsby Institution and Voluntary and Community Services. These organisations will be able to support with insight into the current and potential labour market.

The Council would like to discuss with NGET the potential for local communities (incl. Lincolnshire) can benefit from this development in terms of local energy supply. The Study Area (c.16.4) is evidenced to 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 energy poverty, and live in the some of the most socially and economically deprived communities in the region. They should benefit from such a major development, in terms of benefiting from the development of substations and transmission lines. Whilst the Council understand that this development will not impact the local distribution electricity network, expect the EIA 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. The Council is happy to have

further conversations with NGET about Community Benefit Agreements that can support delivery of this mitigation.

Whilst there are higher levels of the population that is over 65, the EIA should consider the seasonality of employment as a factor on lower level of economic activity in East Lindsey. The high number of people employed by the visitor economy and agriculture are major contributors to this figure, and impact the measures and mitigation within the EIA.

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.

Accessibility of employment sites to rural communities: Should the local workforce/supply chain be encouraged for construction of these site, the EIA should consider how employment be made accessible (in terms of travel) for local people to be able to access employment.

The Council would consider mitigating factors to include:

- Funded travel to work schemes
- 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).

The EIA should consider an approach that prepares 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.

Raising aspirations within the local communities: Evidence shows that low aspirations in the 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. This will support the project by unblocking barriers to local people accessing employment. This will need to be funded activity by the developer.

A further concern is the impact that this project and cumulatively with the other NSIP projects could have on tourism in the area. Greater Lincolnshire has a high-quality and varied visitor economy offer across city, coast and countryside. Up to 50 miles of coastline, an AONB, and hundreds of visitor attractions contribute. The Greater Lincolnshire's Visitor Economy in 2022 was estimated to be worth over £2.49bn per annum and supports approximately 30,000 full time equivalent jobs. Therefore it is necessary to consider very carefully the programme of construction works for this and the other NSIPs that are coming

forward so that disruption to the County's tourism sector is minimised from disruptive construction activities taking place in the six month summer tourism season.

Agricultural land Classification and Soils)

The area is mainly farmland with areas of pumped drainage fen peat and therefore the established land drainage is crucial to maintaining soil productivity.

In consequence these soils are heavily dependent on local field drainage and the wider Internal Drainage Board drainage systems. Any significant disruption in drainage will affect the short term productivity of soils, but may also have longer term consequences.

Soil Disturbance

The mitigation measures will include the requirement for a Soil Management Plan in line with *published guidance, which will form part of the Construction Environmental Management Plan (CEMP)*.

Installing high voltage power cables can involve disturbance of soils across long distances of the countryside affecting farms, natural areas and ecosystems. Soils can be disturbed and damaged during soil handling, storage and reinstatement, adversely affecting natural ecosystems or agricultural production. Field drains can be severed requiring repair, replacement or complete reinstatement. Drainage problems may not be apparent immediately post reinstatement.

These impacts can be minimised by careful evaluation of soil and ground conditions prior to installation, the development of a soil management plan and supervision of on-site operations, together with schedules of condition and post completion assessment.

Soils

According to available published data, local knowledge and the national soil map indicates that the area predominates with Loamy, silty and clayey soils of coastal flats with naturally high groundwater other soil types include localised areas of slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils and large areas of fen silt, or organic fen peatland soils.

These soils are significantly different but rely on drainage, either at field level or pumped drainage for their agricultural productivity and performance. More detailed information on the main soil types is available and basic soil maps have been produced.

The survey work so far undertaken has not been at ALC level but there is a recognition that the route(s) should be investigated at a detailed level to identify soil-based challenges and problems and a specialist is employed.

Construction

To facilitate the construction of overhead high voltage electricity cables, a temporary working width is required. The working width for these underground cables will be up to 80 metres.

The width will be present during the length of the construction period, with suitable temporary fencing, with that temporary fencing removed once the area has been re-instated.

The route will involve a lot of trafficking across the soil and inevitably during the construction phase, there will be compaction and possibly some drains will be severed and dislodged.

Land Drainage

A careful and measured approach should be taken to Land Drainage. Landowners should be fully consulted and existing drainage schemes examined before construction begins. Insofar as reasonably possible, existing drainage schemes should be avoided by the construction, but if they cannot be avoided, they will need to be re-instated to a standard that existed prior to their disturbance to help minimise the impact on continuing farming operations post-construction.

It is not unusual for hydrogeological, hydrological and flood risk assessments to be undertaken as part of the Environmental Impact Assessment along the route. In this case a soil management plan has also been proposed and should relate to both the planning conditions and restoration plan, including farm drainage.

Post Construction

Access & Maintenance

Access to the cables will need to be available in the case of a need to repair, renew or replace the existing infrastructure. In most cases, access to the cables post-construction will only be required when absolutely necessary.

Agricultural Land Classification

The likely impacts on BMV land will be assessed as part of the Agriculture and Soils Chapter of the ES. Mitigation measures will be set out to minimise as far as practicable the effects.

The majority of the site is shown as Grade 1, 2 and 3 on the provisional ALC maps of the area. It is normally expected that any ALC survey be undertaken in line with the MAFF 1988 guidelines and TIN049. These documents set out the precise methodology by which the ALC survey should be undertaken, with auger bore sampling at 1 hectare intervals and a suitable number of soil pits dug to determine the precise nature of the soil(s).

Where there is more permanent loss due to structures beyond the overhead cables there may be a requirement for more detailed ALC assessments.

Farming Circumstance and Impact on Land Holdings

There is no significant mention of the impact on farm holdings or land structures affected by the proposal. From local knowledge there are numerous landowners, or occupiers, but the report does not outline the impact on any of these occupiers or the nature of the tenure of their holdings.

In considering the impact on the overall farming enterprises both locally and across the District or County, it may be necessary to seek additional information on the impact on the individual farms themselves.

Route; Soil

From viewing the maps included in the report it seems likely that 60-100% of the cable route will be BMV, where any loss is likely to be significant. However, irrespective of the land quality issues, there will be matters of concern to farmers and landowners including:-

- Land drainage
- Weed burden

- Biosecurity for plant diseases
- Timeliness of soil stripping, storage and handling
- Compaction of subsoil
- Re-instatement to previous quality/standard

Soil Damage During Construction

Soil structure can be significantly damaged during the construction phase of the process, particularly on heavy clay soils of the Salop series. There is inevitably a lot of trafficking of vehicles on the land to erect the cables and pylons and if this work is undertaken when soils are wet, there can be significant damage. Much of this damage can be remedied post construction, but not all and it is possible that long term drainage issues occur on the site due to the construction.

During the construction phase many of the areas will affect soil and water issues. A Soil Management Plan should be established as part of the Construction Phase, to minimise the impact on soil resources

Minerals and Waste

The Council is the minerals and waste local planning authority for any part of the proposed development that is situated within the administrative boundary of Lincolnshire.

Chapter 11 (Geology and Hydrogeology) – As requested by the EA (see Table 11.2) there are multiple references to avoiding the location of operational and historical waste sites. However, the Council have queries about some of the specifics in relevant paragraphs of section 11.5 – e.g.

- The applicant notes historical landfills in the Study Area (e.g. paras 11.5.17, 11.5.23 & 11.5.42) but not what the impacts are. Will that be assessed in the EIA itself?

Reference is made to LCC MWLP Policy M11: “A standalone Mineral Resource Assessment will be prepared”. The Council welcomes the commitment to prepare a Mineral Resource Assessment but would wish to comment further on the methodology to be used for the production of this document

Whilst note references to waste in Chapter 11 and Chapter 18 (Climate Change) –welcome that that some waste matters are scoped in as set out below but it is not considered this ‘scatter gun’ approach to waste is not appropriate and a single document to capture the waste matters should be included.

Construction waste - Scoped IN as part of climate change GHG emissions assessment

- 18.5.2 = GHG assessment will include volume & disposal method of construction waste.
- Table 18.2 = Assessment will include raw material supply, transport and manufacture, including waste management from these processes.
-

Operational/decommissioning waste – Scoped OUT as part of climate change GHG emissions assessment

- Table 18.3 = End of Life impacts (including waste processing) scoped out as “It is unusual for elements of National Grid’s transmission system to be decommissioned and the site reinstated”.
- Particularly in light of their references elsewhere to decommissioning (e.g. para 4.11.4), are there any examples where a transmission line **has** been decommissioned and, if so, what waste was there and how was it handled?
-

It is considered that this information should be included in a Waste Infrastructure Impact Assessment or similar report should be ‘scoped in’ so that waste matters are captured in a comprehensive way rather than a less desirable incremental approach which is what is currently proposed.

In conclusion whilst the Council maintain strong objection to the proposed development, the Council will continue to engage with the applicant on the evolving preferred route corridor to ensure that the predicted impacts are mitigated as far as possible which could include significant amendments to the proposed scheme.

Yours faithfully

Neil McBride

Head of Planning

From: [Planning LMDB](#)
To: [Grimsby to Walpole](#)
Cc: [Robert Brown](#)
Subject: EN020036 - Grimsby to Walpole Project – EIA Scoping and Consultation & Regulation 11 Notification
Date: 29 August 2024 09:49:04
Attachments: [image004.png](#)

You don't often get email from planning@lmdb.co.uk. [Learn why this is important](#)

Good morning

Thank you for the opportunity to comment upon the submission of the project scope. I would advise that in relation to the scoping documents, Lindsey Marsh Drainage Board have no particular comment or objection to make as this appears to be quite comprehensive.

Sections of the proposed overhead lines pass through the Lindsey Marsh Drainage Board area and will interact with Board maintained watercourses as well as riparian watercourses that sit both within the Board's area and the Board's extended area. The Board's Byelaws will apply to Board maintained watercourses and powers under the Land Drainage Act (1991) to these and any riparian watercourses impacted.

The likely interactions will be:

- Proximity of pylons and any other structures such as substations and compounds in close proximity to watercourses.
- Overhead lines in particular with relation to clearance including sag and sway that may impact the Board's ability to carry out its statutory duties.
- Accommodation works during construction such as the installation of culverts, compounds, all roads or any other infrastructure that may impact upon watercourses in the area.

This list is not exhaustive and further comment will be made as the application progresses and the scheme develops. The Board have already had some pre-application conversations with the applicant and it is anticipated that this dialogue will continue throughout the process. Furthermore, as the scheme potentially impacts a number of Internal Drainage Boards (IDBs) it may very well be the case that all IDBs affected would choose to work collaboratively in a similar way to how they have with proposals such as Outer Dowsing Offshore Wind. This would ensure a consistent approach across all areas.

We look forward to further communications as the scheme progresses.

From: [Louth Town Council - Clerk](#)
To: [Grimsby to Walpole](#)
Subject: EN020036 - Grimsby to Walpole Project - EIA Scoping and Consultation & Regulation 11 Notification
Date: 29 August 2024 15:41:36

You don't often get email from clerk@louthtowncouncil.gov.uk. [Learn why this is important](#)

Dear Colleagues,

Further to your email of 6th August 2024 on the above subject I can confirm that Louth Town Council has now considered the matter.

It would like to reiterate (following completion of the original consultation questionnaire) that it supports the views of neighbouring parish and town councils and would like to suggest that the following should be provided in the EIA:

Details (including the socio-economic impact) of:

1. How the heritage views from the countryside of the Parish Church of St. James', Louth, which has the tallest mediaeval parish church spire in England and which site has been a place of worship for well over a millennium will be effected/protected.
2. How the open (big) skies that East Lindsey is traditionally known for will be effected/protected.
3. How the villages and parishes both on and surrounding any proposed route will be effected/protected.
4. How migrating birds, of which there are many species in Lincolnshire will be effected/protected.
5. How tourism, which is the bread and butter of many Lincolnshire Parishes and Town's, is going to be effected/protected.
6. How is farming and farmland, as Lincolnshire is known as the bread basket of the Country, going to be effected/protected.
7. How other local industries will be effected/protected.
8. How the human population will be effected/protected.
9. How the value of property in the vicinity of the development will be effected/protected.
10. The cost in pounds and unpleasant consequences to the environment and the benefits of all possible alternatives e.g., taking the project offshore, underground, using pylons already existing.
11. T pylons. Could these be used to reduce the environmental impact of an overground project.

Thanking you in anticipation.

Kind regards.

Lynda

Mrs. Lynda Phillips
Town Clerk

Louth Town Council
The Sessions House
Eastgate
Louth

Lincolnshire
LN11 9AJ

Tel: 01507 355895

Web: www.louthtowncouncil.gov.uk

Office Open Hours: 10am to 1pm Monday to Friday

This e-mail and any attachments are confidential and may be privileged. It is for the use of the named recipient(s) only. If you have received it in error, do not copy or disclose its contents and please notify us immediately and then delete it. Email transmission is not a secure means of communication nor is it guaranteed to be error free; emails can be intercepted, lost, destroyed, corrupted or contain viruses. Therefore, Louth Town Council does not accept liability for any errors or omissions in the contents of this message which arise as a result of email transmissions, nor does it accept liability for any loss or damage caused by viruses. The contents of this message may contain personal views which are not the views of Louth Town Council, unless specifically stated. Your information will be processed in accordance with the law, in particular the General Data Protection Regulations. The information that you provide will only be used for Council purposes unless there is a legal authority to do otherwise. Council purposes may include circulation to elected representatives and discussion at Council or Council Committees. The contents of e-mails may also have to be disclosed if requested under the General Data Protection Regulations and the Freedom of Information Act 2000.

 Please consider the environment before printing this email

From: [SM-MMO-SH - MFA Marine Consents \(MMO\)](#)
To: [Grimsby to Walpole](#)
Subject: RE: EN020036 - Grimsby to Walpole Project – EIA Scoping and Consultation & Regulation 11 Notification
Date: 06 August 2024 14:01:15
Attachments: [~WRD0000.jpg](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Marine Licensing, Wildlife Licences and other permissions

Dear Sir/Madam,

Please be aware that any works within the Marine area require a licence from the Marine Management Organisation. It is down to the applicant themselves to take the necessary steps to ascertain whether their works will fall below the Mean High Water Springs mark.

Response to your consultation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing

Works activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009.

Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence.

Applicants should be directed to the MMO's online portal to register for an application for marine licence

<https://www.gov.uk/guidance/make-a-marine-licence-application>

You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in English waters.

The MMO is also the authority responsible for processing and determining Harbour Orders in England, together with granting consent under various local Acts and orders regarding harbours.

A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

The MMO is a signatory to the [coastal concordat](#) and operates in accordance with its principles. Should the activities subject to planning permission meet the above criteria then the applicant should be directed to the follow pages: [check if you need a marine licence](#) and asked to quote the following information on any resultant marine licence

application:

- local planning authority name,
- planning officer name and contact details,
- planning application reference.

Following submission of a marine licence application a case team will be in touch with the relevant planning officer to discuss next steps.

Environmental Impact Assessment

With respect to projects that require a marine licence the [EIA Directive \(codified in Directive 2011/92/EU\)](#) is transposed into UK law by [the Marine Works \(Environmental Impact Assessment\) Regulations 2007 \(the MWR\), as amended](#). Before a marine licence can be granted for projects that require EIA, MMO must ensure that applications for a marine licence are compliant with the MWR.

In cases where a project requires both a marine licence and terrestrial planning permission, both the MWR and The Town and Country Planning (Environmental Impact Assessment) Regulations <http://www.legislation.gov.uk/ukxi/2017/571/contents/made> may be applicable.

If this consultation request relates to a project capable of falling within either set of EIA regulations, then it is advised that the applicant submit a request directly to the MMO to ensure any requirements under the MWR are considered adequately at the following link

<https://www.gov.uk/guidance/make-a-marine-licence-application>

Marine Planning

Under the Marine and Coastal Access Act 2009 ch.4, 58, public authorities must make decisions in accordance with marine policy documents and if it takes a decision that is against these policies it must state its reasons. MMO as such are responsible for implementing the relevant Marine Plans for their area, through existing regulatory and decision-making processes.

Marine plans will inform and guide decision makers on development in marine and coastal areas. Proposals should conform with all relevant policies, taking account of economic, environmental and social considerations. Marine plans are a statutory consideration for public authorities with decision making functions.

At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.

A [map](#) showing how England's waters have been split into 6 marine plan areas is available on our website. For further information on how to apply the marine plans please visit our [Explore Marine Plans](#) service.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the [Marine and Coastal Access Act](#) and the [UK Marine Policy Statement](#) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service soundness self-](#)

[assessment checklist](#). If you wish to contact your local marine planning officer you can find their details on our [gov.uk page](#).

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below;

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

If you require further guidance on the Marine Licencing process, please follow the link <https://www.gov.uk/topic/planning-development/marine-licences>

Kind regards,
Hannah

From: Grimsby to Walpole <grimsbytowalpole@planninginspectorate.gov.uk>

Sent: Tuesday, August 6, 2024 1:58 PM

To: SM-MMO-SH - MFA Marine Consents (MMO)

<marine.consents@marinemanagement.org.uk>; Reed, Rebecca

@marinemanagement.org.uk>

Subject: EN020036 - Grimsby to Walpole Project – EIA Scoping and Consultation & Regulation 11 Notification

Some people who received this message don't often get email from grimsbytowalpole@planninginspectorate.gov.uk. [Learn why this is important](#)

Dear Sir/Madam

Please see attached correspondence on the proposed Grimsby to Walpole Project.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **2 September 2024**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Hannah Terry

Please note my working days are Monday to Thursday. I do not work on Fridays.



Hannah Terry
Senior EIA Advisor
The Planning Inspectorate
T [REDACTED]

 [@PINSgov](#)  [The Planning Inspectorate](#)  [planninginspectorate.gov.uk](#)

Ensuring **fairness, openness** and **impartiality** across all our services

This communication does not constitute legal advice.

Please view our [Information Charter](#) before sending information to the Planning Inspectorate. Our [Customer Privacy Notice](#) sets out how we handle personal data in accordance with the law.

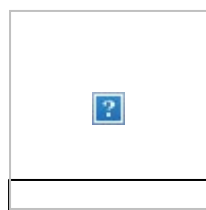
[Please take a moment to review the Planning Inspectorate's Privacy Notice which can be accessed by clicking this link.](#)

Please note that the contents of this email and any attachments are privileged and/or confidential and intended solely for the use of the intended recipient. If you are not the intended recipient of this email and its attachments, you must take no action based upon them, nor must you copy or show them to anyone. Please contact the sender if you believe you have received this email in error and then delete this email from your system.

Recipients should note that e-mail traffic on Planning Inspectorate systems is subject to monitoring, recording and auditing to secure the effective operation of the system and for other lawful purposes. The Planning Inspectorate has taken steps to keep this e-mail and any attachments free from viruses. It accepts no liability for any loss or damage caused as a result of any virus being passed on. It is the responsibility of the recipient to perform all necessary checks.

The statements expressed in this e-mail are personal and do not necessarily reflect the opinions or policies of the Inspectorate.

DPC:76616c646f72





Defence Infrastructure Organisation

Wendy Talbot
Ministry of Defence
Safeguarding Department
St George's House
DIO Headquarters
DMS Whittington
Lichfield
Staffordshire
WS14 9PY

Your Reference: EN020036

MoD Telephone: 07977410762

Our Reference: DIO10062577

E-mail: DIO-safeguarding-statutory@mod.gov.uk

Hannah Terry
The Planning Inspectorate
Temple Quay House
2 The Square
BRISTOL
BS1 6PN

9 August 2024

Dear Hannah

MOD Safeguarding – RAF Coningsby, Holbeach Air Weapons Range (AWR), East WAM (Wide Area Multilateration) Network and Military Low Flying System

Proposal: The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

Location: From west of Grimsby to Walpole, near Wisbech

Grid Refs:

	Easting	Northing
Aylesby	521262	408222
West of Spilsby	553226	364539
Stickford	535677	360194
West of Boston	527303	343670
Wigtoft	526470	336004
East of Spalding (Weston)	528335	324911
Tydd St Giles	541512	315684
Walpole	548549	314123

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

This proposal sets out a preliminary route for a new 400kV overhead power line between Grimsby and Walpole. The line will stretch approximately 140km from west of Grimsby to Walpole, supported on electricity transmission towers with a typical height of 50m and include the provision for new substations.

The development route passes through the statutory aerodrome safeguarding zone surrounding RAF Coningsby and the statutory technical safeguarding zones protecting transmitter/receiver air traffic navigational installations forming part of the East 1 WAM Network. The proposed overhead line route also affects the statutory safeguarding zone that contains Holbeach Air Weapons Range (AWR). These safeguarded zones serve to ensure that the MOD is consulted on developments which might affect operational capability.

At this stage and on the basis of the information currently available, I can confirm that the MOD has concerns due to those aspects of the proposal set out below.

RAF Coningsby

Aerodrome safeguarding

The airspace above and around aerodromes is safeguarded to maintain an assured, obstacle free environment for aircraft manoeuvre. To enable assessments to be completed, a series of three-dimensional surfaces known as Obstacle Limitation Surfaces are drawn around aerodromes, any tall structures that might penetrate those surfaces, whether independently or due to the topography on which they are to be sited, are of concern of the MOD.

The proposed route of the development passes through the aerodrome height safeguarding zone for RAF Coningsby, this is a concern which might be addressed by additional data being made available. At this stage, where no details are available for the design or location of the proposed electricity transmission towers, MOD must identify that the location and height of the proposed electricity transmission towers may be a potential concern. The MOD should be consulted when further details of specific locations and heights of each of the proposed towers become available, this will enable a detailed assessment to be carried out.

Holbeach AWR

The Holbeach AWR provides a facility at which military training including aerial bombing and live firing activities are conducted. The range is widely used by a variety of military aircraft types including fast jets and helicopters during both the daytime and at night. Military aircraft using the AWR will typically operate at low altitudes and may fly into and out of the Danger Airspace containing the range in any direction. The range delivers essential training to UK and allied nations.

To enable a detailed assessment of the development to be completed specific details for each electricity transmission tower (to include a grid reference and elevation drawings/figured dimensions) as well as the likely cable height, along with the proposed location of the new substation, should be provided.

East WAM Network

Technical Safeguarding

The development route passes through safeguarding zones protecting radio microwave links that form part of the East 1 WAM Network. These safeguarding zones serve to manage the height of new structures and materials used in their construction, as well as sources of electromagnetic interference to maintain the effective operation of the East 1 WAM Network.

To enable a detailed assessment of the development to be completed specific details for each electricity transmission tower (to include a grid reference and elevation drawings/figured dimensions) as well as the likely cable height and maximum electrical load of the overhead lines will need to be provided.

Military Low Flying Training

The proposed route for the new overhead power line will occupy military Low Flying Areas 6 (LFA 6) and 11 (LFA 11). Within these areas military aircraft may conduct low level flight training. The addition of a development featuring tall or narrow profile structures such as electricity transmission towers in this locality has the potential to introduce a physical obstruction to low flying aircraft operating in the area.


To enable a detailed assessment of the development to be undertaken details of the locations of each electricity transmission tower and associated cable heights will be needed.

At this initial consultation stage, where no details are available for the design or maximum height of the proposed development, MOD representations are limited to the principle of the development only. In summary, the MOD has concerns and should be consulted at all future stages for this proposed development to complete a full detailed safeguarding assessment.

The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed in the developer's documents titled "Grimsby to Walpole Environmental Impact Assessment Scoping Report" dated August 2024. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely



Wendy Talbot
Assistant Safeguarding Manager
DIO Safeguarding

Submitted via email to: grimsbytowalpole@planninginspectorate.gov.uk

13/08/2024

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by National Grid Electricity Transmission (the Applicant) for an Order granting Development Consent for the Grimsby to Walpole project (the Proposed Development)

I refer to your email dated 06/08/2024 regarding the above proposed DCO. This is a response on behalf of National Gas Transmission (NGT). Having reviewed the scoping consultation documents, NGT wishes to make the following comments regarding gas infrastructure which may be affected by proposals.

NGT has many feeder mains located within or in proximity to the Order limits. Details of this infrastructure is as follows:

- Feeder Main – FM17 – Theddlethorpe to Hatton
- Feeder Main – FM08 – Theddlethorpe to Hatton
- Feeder Main – FM07 – Hatton to Gosberton
- Feeder Main – FM07 – Gosberton to Tydd St Giles
- Feeder Main – FM04 – Wisbech Nene West to Tixover
- Feeder Main – FM07 – Tydd St Giles to Old Warden
- Feeder Main – FM07 – Tydd St Giles to Wisbech Nene West
- Feeder Main – FM04 – Kings Lynn Comp to Wisbech Nene West
- Feeder Main – FM02 – Brisley to Wisbech Nene West
- Cathodic Protection Groundbeds/TR
- Ancillary apparatus

Please note that NGT has existing easements for these pipelines which provides rights for ongoing access and prevents the erection of permanent / temporary buildings/structures, change to existing ground levels or storage of materials etc within the easement strip.

You should also be aware of NGT's guidance for working in proximity to its assets, further guidance and links are available as follows.

CATHODIC PROTECTION SYSTEM

To ensure a high level of safety and reliability in operation, National Gas Transmission's assets are protected by a cathodic protection system. It is essential that buried steel pipework

associated with the transmission and distribution of natural gas is designed, installed, commissioned and maintained to withstand the potentially harmful effects of corrosion and that the corrosion control systems employed are monitored to ensure continued effectiveness. Installations in the vicinity of National Gas Transmission's assets which may potentially interfere with the cathodic protection system must be assessed and approved by National Gas Transmission, and appropriate control measures must be put in place where required.

Installations which have the potential to interfere with National Gas Transmission's Cathodic protection system include (but are not limited to):

1. High voltage cable crossings and parallelism
2. High voltage ac pylon parallelism
3. Battery Energy Storage Systems
4. Third party pipelines with cathodic protection systems
5. PV Solar arrays

Further information on D.C interference can be found in UKOPA/GPG/031 Edition C Microsoft Word - UKOPA GPG 031 DC Interference Ed 1.docx

[Microsoft Word - UKOPA GPG 031 DC Interference Ed 1.docx](#) (hold ctrl and click to access) Further information on A.C. interference can be found in UKOPA/GPG/027 UKOPA Good Practice Guide [UKOPA Good Practice Guide](#) (hold ctrl and click to access)

The safe limits for transfer voltage and impressed current that a high-pressure gas pipeline can be exposed to are outlined in T/PL/ECP/1, T/PL/ECP/2 and BS EN 50122-1. These are the safe limits for non-electrically trained personnel.

Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGT's apparatus, NGT will require appropriate protection and further discussion on the impact to its apparatus and rights including adequate Protective Provisions. A Deed of Consent will also be required for any works proposed within the easement strip.

Key Considerations:

- NGT has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc.
- Please be aware that written permission is required before any works commence within the NGT easement strip. Furthermore a Deed of Consent will be required prior to commencement of works within NGT's easement strip subject to approval by NGT's plant protection team.
- Any large installations which may result in a large population increase in the vicinity of a high pressure gas pipeline must comply with the HSE's Land Use Planning methodology, and the HSE response should be submitted to National Gas Transmission for review
- The below guidance is not exhaustive and all works in the vicinity of NGT's asset shall be subject to review and approval from NGT's plant protection team in advance of commencement of works on site.

General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and NGT's Dial Before You Dig Specification for Safe Working in the Vicinity of NGT Assets. There will be additional requirements dictated by NGT's plant protection team.
- NGT will also need to ensure that its pipelines remain accessible during and after completion of the works.
- Our pipelines are normally buried to a depth cover of 1.1 metres, however actual depth and position must be confirmed on site by trial hole investigation under the supervision of a NGT representative. Ground cover above our pipelines should not be reduced or increased.
- If any excavations are planned within 3 metres of NGT High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a NGT representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.
- Below are some examples of work types that have specific restrictions when being undertaken in the vicinity of gas assets therefore consultation with NGT's Plant Protection team is essential:
 - Demolition
 - Blasting
 - Piling and boring
 - Deep mining
 - Surface mineral extraction
 - Landfilling
 - Trenchless Techniques (e.g. HDD, pipe splitting, tunnelling etc.)
 - Wind turbine installation - minimum separation distance of 1.5x the mast/hub height is required, and any auxiliary installations such as cable or track crossings will require a deed of consent.
 - Solar farm installation
 - Tree planting schemes

Traffic Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations.
- Permanent road crossings will require a surface load calculation, and will require a deed of consent.

- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.
- The type of raft shall be agreed with NGT prior to installation.
- No protective measures including the installation of concrete slab protection shall be installed over or near to the NGT pipeline without the prior permission of NGT
- NGT will need to agree the material, the dimensions and method of installation of the proposed protective measure.
- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to NGT.
- An NGT representative shall monitor any works within close proximity to the pipeline to comply with NGT specification T/SP/SSW22

New Asset Crossings:

- New assets (cables/pipelines etc) may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- The separation distance for a cable >33kV is 1000mm and pre and post energisation surveys may be required at National Gas Transmission's discretion. A risk assessment/method statement will need to be provided to, and accepted by National Gas Transmission prior to the deed of consent being agreed. Where a new asset is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.
- A new service should not be laid parallel within an easement strip
- Clearance must be at least 600mm above or below the pipeline
- An NGT representative shall approve and supervise any cable crossing of a pipeline.
- A Deed of Consent is required for any cable crossing the easement

Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGT apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO. NGT requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection.

Adequate access to NGT pipelines must be maintained at all times during construction and post construction to ensure the safe operation of our network.

Yours Faithfully

Asset Protection Team

Further Safety Guidance

To download a copy of the HSE Guidance HS(G)47, please use the following link:

<https://www.hse.gov.uk/pubns/books/hsg47.htm>

Working Near National Gas Assets

<https://www.nationalgas.com/land-and-assets/working-near-our-assets>

Specification for Safe Working in the Vicinity of National Gas High Pressure Pipelines and Associated Installations

<https://www.nationalgas.com/document/82951/download>

Tree Planting Guidance

<https://www.nationalgas.com/document/82976/download>

Excavating Safely

<https://www.nationalgas.com/document/82971/download>

Dial Before You Dig Guidance

<https://www.nationalgas.com/document/128751/download>

Essential Guidance:

<https://www.nationalgas.com/gas-transmission/document/82931/download>

Solar Farm Guidance

<https://www.nationalgas.com/document/82936/download>

From: [Alice Lawman](#)
To: [Grimsby to Walpole](#)
Subject: EN020036 - Grimsby to Walpole Project – National Highways EIA Scoping Consultation Response
Date: 02 September 2024 12:03:56

You don't often get email from [REDACTED]@nationalhighways.co.uk. [Learn why this is important](#)

National Highways Scoping Opinion Consultation Response

National Highways welcomes the opportunity to respond to the consultation for a Scoping Opinion for the application for Development Consent for the Grimsby to Walpole project.

On behalf of the Secretary of State for Transport, National Highways is responsible for managing and operating a safe and efficient Strategic Road Network (SRN) under the provisions of the Infrastructure Act 2015 and is the highway authority for the Strategic Road Network (SRN). The Department for Transport (DfT) Circular 01/2022 (Strategic road network and the delivery of sustainable development) sets out how National Highways will work with developers to ensure that specific tests are met when promoting a scheme. This includes ensuring the transport impact is understood, any mitigation (or other infrastructure) is designed in accordance with the relevant standards and that environmental impacts are appraised and mitigated accordingly. In addition, National Highways are responsible for ensuring the SRN serves its purpose as a part of a national system for through traffic in accordance with Section 10 of the Highways Act 1980, and to satisfy the reasonable requirements of road safety.

National Highways are most notably interested in reviewing information relating to sections 1, 6 and 7 as areas closest to the SRN. Please note that Section 1 falls within the Yorkshire and North East Regional team and any correspondence relating to this section should be sent to planningYNE@nationalhighways.co.uk. Sections 6 & 7 fall within the East Region and any correspondence relating to these sections should be sent to planningee@nationalhighways.co.uk. For ease, I will remain the main point of contact and can coordinate joint regional discussions as, and when required.

National Highways have reviewed the Scoping Reports and would require the following information to be included within the Environmental Statement:

- a vision as per the Circular 01/2022,
- outline relevant National and Local Policies;
- summarise existing baseline conditions;
- provide details of the Proposed Project;
- sets out the distribution of the construction traffic;
- details the construction trip generation;
- identify any necessary mitigation;
- assesses the impact of local committed developments;
- Carryout a cumulative assessment for the other NSIPs that are coming through around the project area and
- summarises the findings and provide an overall conclusion.

National Highways suggest the following documents are referenced within the

policy review for the project:

- National Policy Statements EN-1 and EN-5;
- National Planning Policy Framework (NPPF) (2023);
- Department for Transport Planning Policy Paper (DfT Circular 01/2022);
- National Highways 'The Strategic Road Network: Planning for the Future Guide' (2015);

In addition to the above, National Highways have the following comments to make.

National Highways consider AIL's would need to be scoped in and considered at EIA stage. National Highways would advise that the Applicant directly discusses any matters pertaining to AIL movements with the National Highways Abnormal Indivisible Loads team (AbnormalIndivisibleLoadsTeam@nationalhighways.co.uk). Increased congestion and increased journey times/distance due to road closures or diversions for abnormal load access on the receptor 'Road user' would need to be scoped in due to the cumulative impact of other developments on the SRN.

National Highways advises consideration of any committed development and their cumulative impact within the project area are outlined within the Environmental Statement and Transport Assessment.

National Highways agree with the inclusion of SRN junctions within the Study Area. Further to this, we request the Applicant to provides information on the trip distribution, providing flow diagrams which include the junctions with the SRN in the vicinity of the proposed development. If the proposed development proposes to generate an increase of 30 two-way movements or more on any junctions on the Strategic Road Network within a peak period (AM or PM), we expect a capacity assessment to be undertaken to assess the impact of the proposed trips on the affected junctions and provide mitigations, if required. Where a junction capacity assessment could potentially be required, and we ask that National Highways are consulted early during the TA scoping process to ensure impacts to the SRN (and LRN) are appropriately assessed. This will enable us to determine the severity of traffic from this development on the operation and safety of the SRN.

National Highways trusts its response provides clarification of its concerns and identify other matters which National Highways considers need to be addressed at this stage of the project. However, if you have any questions or comments regarding the contents of the letter then please do not hesitate to contact me on the details provided. National Highways looks forward to continuing positive engagement with National Grid as the project progresses.

Kind regards
Alice

Alice Lawman MRTPI

Spatial Planner
Operations (East) | National Highways

Woodlands | Manton Lane | Bedford | MK41 7LW

Mobile: [REDACTED]

Web: www.nationalhighways.co.uk

For any planning related matters please email PlanningEE@nationalhighways.co.uk

This email may contain information which is confidential and is intended only for use of the recipient/s named above. If you are not an intended recipient, you are hereby notified that any copying, distribution, disclosure, reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please notify the sender and destroy it.

National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://nationalhighways.co.uk> | info@nationalhighways.co.uk

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

Consider the environment. Please don't print this e-mail unless you really need to.

From: [NATS Safeguarding](#)
To: [Grimsby to Walpole](#)
Subject: RE: EN020036 - Grimsby to Walpole Project – EIA Scoping and Consultation & Regulation 11 Notification [SG37944]
Date: 12 August 2024 11:23:13
Attachments: [~WRD0000.jpg](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[image016.png](#)

You don't often get email from natssafeguarding@nats.co.uk. [Learn why this is important](#)

Our Ref: SG37944

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully



NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



Date: 02 September 2024
Our ref: 484533
Your ref: EN020036



The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN
grimsbytowalpole@planninginspectorate.gov.uk

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

BY EMAIL ONLY

Dear Sir / Madam

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: Application by National Grid Electricity Transmission plc (the Applicant) for an Order granting Development Consent for the Proposed Grimsby to Walpole Project (the Proposed Development)

Location: Lincolnshire

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 06 August 2024, received on 06 August 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO). Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the Proposed Development.

Natural England have participated previously in non-statutory pre-application engagement on the Proposed Development with the Applicant. Comments on this are included in the attached Annex.

For any further advice on this consultation please contact the case officer [REDACTED] [@naturalengland.org.uk](mailto:[REDACTED]@naturalengland.org.uk) and copy to consultations@naturalengland.org.uk.

Yours faithfully

Lucy Collins
Sustainable Development Higher Officer
East Midlands Area Team

Annex A – Natural England’s Advice on EIA Scoping

1. General principles

1.1 Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES

1.2 Through our discussions with the applicant to date, Natural England (NE) are confident that the general principles above are likely to be addressed within the Environmental Statement.

1.3 It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the ‘in combination’ effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

2. Cumulative and in-combination effects

2.1 It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the ‘in combination’ effects of the proposed development with any existing developments and current applications.

2.2 An impact assessment should identify, describe, and evaluate the effects that are likely

to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a) existing completed projects
- b) approved but uncompleted projects
- c) ongoing activities
- d) plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e) plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects

2.3 In particular, NE would like to refer to the high development pressure around the Humber Estuary. The impacts of this proposal in combination with other projects (NSIPS and TCPA projects) along the Humber must be considered within the ES. Especially, projects with the potential to impact functionally linked land should be considered.

3. Biodiversity and geodiversity

3.1 The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.

3.2 Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

3.3 Public authorities who operate in England must consider what they can do to conserve and enhance biodiversity in England. This is the strengthened '[biodiversity duty](#)' that the Environment Act 2021 introduces. This means that, as a public authority, National Grid must:

- Consider what they can do to conserve and enhance biodiversity.
- Agree policies and specific objectives based on their consideration.
- Act to deliver their policies and achieve their objectives.

4. International and European sites

4.1 The development site is within or may impact on the following **European/internationally designated nature conservation site(s)**:

- Humber Estuary Special Area of Conservation (SAC)
- Humber Estuary Special Protection Area (SPA)
- Humber Estuary Ramsar
- The Wash & North Norfolk Coast SAC
- The Wash SPA
- The Wash Ramsar
- Saltfleetby – Theddlethorpe Dunes & Gibraltar Point SAC
- Gibraltar Point SPA

- Gibraltar Point Ramsar

4.2 The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes SPAs, SACs, listed Ramsar sites, candidate SACs and proposed SPAs.

4.3 Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.

4.4 Table 1 outlines potential impact pathways where further information/assessment is required. The advice is based on the information provided at this stage. NE may have additional comments to make when further information is provided.

Table 1: Potential risks to international/European designated sites

Site name with link to conservation objective	Potential impact pathways where further information/assessment is required
<ul style="list-style-type: none"> • Humber Estuary SPA • Humber Estuary Ramsar • The Wash SPA • The Wash Ramsar • Gibraltar Point SPA • Gibraltar Point Ramsar 	<p><u>Ornithological Interest</u></p> <ul style="list-style-type: none"> • Noise & Visual Disturbance to birds during construction, including at Functionally Linked Land (FLL). • Bird collision risk during operation. • Visual Disturbance to birds during operation, including changes in lighting, perception as pylons as predator perch points. • Long term loss or damage to supporting habitats, including FLL. <p>NE welcomes that the Habitats Regulations Assessment (HRA) will be informed by wintering and passage bird surveys. Please refer to Annex C Passage and wintering bird surveys for functionally linked land associated with the Humber Estuary and/or Lower Derwent Valley designated sites (Version 1.1, December 2021) for guidance on the methodology and presentation of the bird survey results to aid the assessment of impacts.</p> <p>We also recommend referring to Annex B: Humber Estuary Special Protection Area: non-breeding waterbird assemblage (Version 1.2, June 2023) for guidance on assessing impacts to the 'main component species' of the Humber Estuary SPA non-breeding waterbird assemblage.</p> <p>NE has generally advised that if $\geq 1\%$ of a designated bird species population could be affected by a proposal, alone or in combination with other plans or projects, then further consideration is required. However, where species are particularly</p>

Site name with link to conservation objective	Potential impact pathways where further information/assessment is required
	<p>vulnerable due to declines in the Humber Estuary population, then it may not be appropriate to rely on the 1% of the estuary population as the critical threshold. Mitigation measures may be required where lower numbers of vulnerable species are using a site that is proposed for development.</p> <p>Comments on Chapter 8 of the EIA Scoping Report:</p> <ul style="list-style-type: none"> • Table 8.1 notes 2 surveys a month will be completed for higher risk areas. We welcome this frequency for surveying high risk areas. We would advise higher risk areas are informed by the year 1 surveys and the Impact Risk Zones (IRZs) for the designated sites. • Paragraph 8.5.62 notes that there is some difference between the survey coverage and the scoping boundary due to the evolving corridor. As the Applicant has confirmed they will still collect two years of wintering bird data for this area, we agree that this will not constrain the final evaluation of impacts. • Paragraph 8.5.64 states that a qualitative assessment of collision risk will be made. We agree this is a suitable approach. • Table 8.4 sets out the impacts scoped in and out of the assessment. We agree with the scoping conclusions. • Table 8.5 summarises the scope of the surveys, which is as we have previously agreed for wintering and breeding birds. <p>Comments on Appendix 8B:</p> <ul style="list-style-type: none"> • P.10-11 state that the wintering bird surveys for 2024-2025 will cover the months Nov-Mar. We normally advise the wintering period should include Oct – Mar, as advised for the project. Table 8.5 in the Scoping Report states that surveys will cover Oct – Mar. Therefore, we need clarification on which months will be included in the wintering bird survey. We would strongly recommend including Oct 2024 in the survey schedule.
<ul style="list-style-type: none"> • Humber Estuary SAC • The Wash & North Norfolk Coast SAC • Saltfleetby-Theddlethorpe Dunes & 	<p><u>Habitat Interest</u></p> <ul style="list-style-type: none"> • Air Quality impacts via construction traffic and dust mobilisation. See section 16 below. • Loss and fragmentation of designated habitats and FLL for mobile species (including lamprey and otter), including from barrier effects.

Site name with link to conservation objective	Potential impact pathways where further information/assessment is required
Gibraltar Point SAC	<ul style="list-style-type: none"> • Pollution events & water quality changes where hydrologically connected to the designated sites. See section 17 below. • Changes to the hydrology of the designated sites from discharge and / or abstraction. See section 17 below. <p><u>Species Interest</u></p> <ul style="list-style-type: none"> • Disturbance to River Lamprey <i>Lampetra fluviatilis</i> and Sea Lamprey <i>Petromyzon marinus</i>, i.e. noise, vibration and pollution, including at functionally linked habitats (Humber Estuary SAC). • Disturbance to Otter <i>Lutra lutra</i>, i.e. noise, vibration and pollution, including at functionally linked habitats (The Wash and North Norfolk Coast SAC). • Long term loss, fragmentation or damage to supporting habitats, including functionally linked habitats.

5. Nationally designated sites - Sites of Special Scientific Interest

5.1 Sites of Special Scientific Interest (SSSI) are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSI and its special interest features can be found at www.magic.gov.uk.

5.2 Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

5.3 The development site is within or may impact on the following **Sites of Special Scientific Interest**:

- Humber Estuary SSSI
- The Wash SSSI
- Gibraltar Point SSSI
- Bratoft Meadows SSSI

5.4 The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSIs and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. NE agree with those impacts, receptors and potential for significant effects outlined in Table 8.4 of the EIA Scoping Report.

Table 2: Potential risks to nationally designated sites

Site name with link to citation	Potential impact pathways where further information/assessment is required
<ul style="list-style-type: none"> • Humber Estuary SSSI 	A SSSI impact assessment will be required to provide an assessment of the impacts to features which are only notified as part

Site name with link to citation	Potential impact pathways where further information/assessment is required
<ul style="list-style-type: none"> • The Wash SSSI • Gibraltar Point SSSI 	<p>of the SSSIs, as well as the assessment of those which are also designated as European site features in Table 1. The impact pathways to be considered within the assessments are the same as stated above for the international/European designations in Table 1.</p>
<ul style="list-style-type: none"> • Bratoft Meadows SSSI 	<p>NE notes from the non-statutory consultation that sections 6 and 7 of the cable search routes include areas in proximity to Bratoft Meadows SSSI, which is notified for its lowland neutral grassland feature. Any construction activity within 200m will need to review air pollution impacts to the site including from dust and NO_x from increased traffic movements during construction and any maintenance activities once operational.</p>

6. Regionally and Locally Important Sites

6.1 The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geo-conservation group or other local group and protected under the NPPF (paragraph 174 and 175). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

7. Nationally designated landscapes

7.1 Public bodies have a duty to seek to further the statutory purposes of designation in carrying out their functions (under section 245 of the Levelling Up and Regeneration Act 2023). This duty also applies to proposals outside the designated area but impacting on its natural beauty.

7.2 The development site may impact on the Lincolnshire Wolds National Landscape (LWNL); formally known as the Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB).

7.3 The [Overarching National Policy Statement for Energy \(EN-1\)](#) (section 5.10) provides significant protection for these nationally designated landscapes including their settings.

7.4 Assessment should be made of the direct and indirect effects on this designated landscape and in particular the effect upon its special qualities and purpose for designation – conserving and enhancing natural beauty. The management plan for the designated landscape may also have relevant information that should be considered in the EIA.

7.5 The ES should also include assessment of impact of severance on biodiversity and the functionality of habitats at a landscape scale in the national landscape setting. This should include how impacts to these features will be avoided.

7.6 Natural England have encouraged the Applicant to engage the Lincolnshire Wolds National Landscape Partnership to discuss potential impacts of the proposals national landscape. We understand this has been happening in relation to creating the LVIA.

7.7 Comments on the EIA Scoping Report:

- The statutory purpose of the Lincolnshire Wolds National Landscape is to conserve and enhance the area’s natural beauty. NE welcome the Project will be designed to comply with existing National Grid standards and the guidelines and policies detailed in [National Policy Statement for Electricity Networks Infrastructure \(EN-5\)](#) (Chapter 2, paragraph 2.9.7 to 2.9.25).
- NE’s landscape advice will focus on the potential for adverse effects on the statutory purpose of the LWNL and its setting. NE consider that much of the proposed route is likely to be within 5km of the LWNL boundary and within the setting of the LWNL and emphasise that this route is adjacent to the entire eastern edge of the designation, a circa 50km distance.
- We note that the Applicant has provided their own summary of NE’s advice in Table 6.1 of the EIA Scoping Report. Natural England’s full advice on the project to date, reviewed in the context of the EIA Scoping Report, is presented below within Table 3.
- We would like to note that the full rationale for the 2km buffer to the national landscape was not understood by NE at the route-selection (CPRSS) stage. We note that the EIA Scoping Report is proposing a study area of 5km from the proposed route, which is sited within 1km of the national landscape in places, and that the *“emphasis of the assessment will, however, be based on receptors lying within 3 km as beyond this distance significant landscape effects are highly unlikely to arise”* (para 6.4.6 EIA Scoping Report). We are unclear what landscape evidence has been used to establish these 5km and 3km thresholds, particularly in the absence of maps showing zones of theoretical visibility, however we welcome the Applicants intention to produce this evidence over a 10km distance.

Table 3: Natural England’s EIA scoping advice on the Grimsby to Walpole project to date regarding the potential for adverse effects on the statutory purpose of the Lincolnshire Wolds National Landscape and its setting.

Stage	NE Advice	NE further comment at EIA Scoping stage
CPRSS methodology	NE’s landscape advice will focus on the potential for adverse effects on the statutory purpose of the LWNL and its setting. LWNL is a nationally designated landscape, and its statutory purpose is to conserve and enhance the area’s natural beauty. Consideration should be given to the direct and indirect effects on the designated landscape, and particularly the effect upon its purpose for designation, as well as the content of the relevant management plan.	Advice remains.
	The information presented does not provide certainty that the project can avoid direct impacts to the national landscape, the project would not be sited within the 2km buffer to the national landscape, the rationale behind the 2km buffer, the rationale behind the sensitivity weighting of the 2km buffer, or how landscape and visual evidence will inform the evaluation of the various route options.	The EIA Scoping Report indicates that the project cannot avoid direct impacts to the national landscape (temporary access routes), and that the project is sited within 1km of the LWNL at its closest. The rationale/evidence behind the CPRSS methodology was not provided to NE.
	NE support the presumption of undergrounding cables if the corridor was to go through the LWNL, as well as no substations or OHL within the LWNL. The technical note on CPRSS methodology	Advice remains. 6.5.36 of EIA scoping report states <i>“It is therefore proposed to exclude consideration of the direct effects on the landscape of the Lincolnshire Wolds</i>

	<p>states “<i>The buffers were not intended to be areas where transmission development must be avoided but instead are areas where transmission development should be minimised</i>”. NE advise that impacts to the landscape setting of LWNL is properly considered within early assessment.</p>	<p><i>National Landscape (AONB) from the assessment with the exception of any effects arising from temporary access routes</i>”. Accordingly, NE advises that the LVIA include an assessment of the potential direct impacts from temporary access routes through the LWNL.</p> <p>Table 6.2 states “<i>at its closest the Lincolnshire Wolds National Landscape (AONB) lies within 1 km of the Scoping Boundary and the Project is partly within the setting of the designated area. Some of the roads through the designated area may be used as temporary access routes.</i>” NE consider that much of the proposed route is likely to be within 5km of the LWNL boundary and therefore within the setting of the LWNL and emphasise that this route is adjacent to the entire eastern edge of the designation, ca. 50km.</p> <p>NE note that a specific “setting study” is proposed by the Applicant to be submitted alongside other landscape assessment. We advise that this assessment includes effects on the ‘special qualities’ of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.</p> <p>NE are unclear what landscape and visual evidence has underpinned the proposed study area shown in Figure 6.1. The study area should be informed by ZTV analysis, which has not been provided. Appendix 6A (landscape methodology) provides no rationale behind using the metric 0.61 degrees to rule out significant landscape and visual effects.</p>
	<p>NE support that the LWNL is afforded the highest sensitivity weighting of 5 “Very High potential for the Project to be constrained” (as defined in the technical note).</p>	<p>Advice remains.</p>
	<p>NE are not clear why the 2km buffer to LWNL has been allocated a sensitivity weighting of 2 “Low potential to constrain the Project” for all project elements (OHL corridor, cable corridor, substation site). This requires justification. National planning policy and guidance is clear that development outside but within the setting of a designated landscape can impact negatively on its</p>	<p>Advice remains.</p>

	statutory purposes.	
	NE are not clear why the sensitivity weightings of the OHL corridor, cable corridor, substation site (within the 2km buffer) are the same. This requires justification. Different infrastructure types have different landscape & visual impacts, and the sensitivity weightings (for 2km buffer) should reflect this/justify why they are the same.	Advice remains.
	What landscape and visual evidence, and rationale, has been used to underpin the proposal for a 2km buffer?	Advice remains.
	<p>Page 4 of technical report states that “The extent of buffers was based upon the professional judgement of the relevant Project team subject matter expert, considering relevant legislation, policy and best practice.”</p> <ul style="list-style-type: none"> Is the “Identification of designated sites” and a “Review of Landscape Character Assessments of relevance to the study areas” the only landscape evidence used to inform routeing and siting (and the buffer)? Is this the full list of data used? How did the ground truthing exercise (pg. 20) and the LCA review inform the corridors and siting zones, and the buffer? What was the relevant legislation, policy and best practice considered (for landscape-related constraints)? Full methodology should include this. 	Advice remains. Clarifications on the landscape evidence used by the Applicant in their routing and siting considerations has not been provided to NE. However, NE note that the EIA Scoping Report including Appendix 6A (methodology) does include information about the legislation, policy and guidance considered.
Non-statutory consultation	The CPRSS confirms that direct impacts to the LWNL cannot be avoided by the Corridors, Siting Zones, and Siting Areas presented (Table 5-5). We note that (para 5.2.22) “ <i>Due to the potential challenge in routeing in the area between the AONB and Grimsby/Cleethorpes it was therefore considered that an alternative underground cable corridor to the west of the Overhead Line Study Area (within the AONB) should be considered as a viable alternative</i> ”. NE advise that a robust justification as to why the Western Corridor route cannot avoid the AONB (or its setting) will be necessary to meet the requirements of national policy. NE would like to understand this justification.	Advice remains.
	We note that para 6.2.9 confirms that lines within AONB will be undergrounded, and that temporary significant adverse effects on the AONB could occur during construction. NE support the presumption of undergrounding cables if a direct route through the AONB is unavoidable. NE advise that the scope of the LVIA should include an assessment of potential construction and operational effects on the defined (in the AONB Management	Advice remains.

	<p>Plan) special qualities of the AONB and the delivery of the area's statutory purpose. NE advise that any assumptions at this stage that the buried pipeline will not have any adverse (significant or otherwise) effects once the route is reinstated and the scheme is operating should be avoided.</p>	
	<p>NE advise that further details on the design and siting of Sealing End Compounds should be provided, and that the potential effects of Sealing End Compounds on the AONB should be included within the scope of the LVIA.</p>	<p>NE note the clarification on page 6-10 of the EIA Scoping Report that "No Sealing End Compounds are currently proposed as part of the Project."</p>
	<p>NE advise that OHLs within parts of the Western Corridor have the potential to be within the immediate setting of the AONB. We note that the CPRSS acknowledges this potential effect, which NE advise will need to be explored further within an LVIA (para 6.2.8) "<i>There is potential that, even with careful routeing, significant adverse visual effects on the setting of the AONB and views to/from the AONB may not be avoidable and therefore consideration of other mitigation (informed by detailed landscape and visual assessments) such as alternative pylon types or undergrounding an overhead line (as described in Paragraph 4.8.4, hereafter 'other mitigation') in these Sections may be considered.</i>". NE would like to understand whether OHL will be avoided completely in the 2km constraint buffer to the AONB, and the scope for undergrounding cables within the setting of the AONB.</p>	<p>Advice remains.</p> <p>NE notes that the EIA Scoping Report indicates that the project cannot avoid direct impacts to the national landscape (temporary access routes), and that the project is sited within 1km of the LWNL at its closest.</p>
<p>EIA Scoping Report</p>	<p>Lincolnshire Wolds Nationally Designated Landscape</p> <ul style="list-style-type: none"> • The development site is within or may impact on the LWNL. • National Policy Statements EN-1 and EN-5 provide the highest level of planning protection for these nationally designated landscapes. • Public bodies have a duty to seek to further the statutory purposes of designation in carrying out their functions (under section 245 of the Levelling Up and Regeneration Act 2023). This duty also applies to proposals outside the designated area but impacting on its natural beauty. • Consideration should be given to the direct and indirect effects on this designated landscape and in particular the effect upon its purpose for designation. The management plan for the designated landscape may also have relevant information that should be considered in the EIA. 	<p>N/A.</p>

	<p>Landscape and visual impacts</p> <ul style="list-style-type: none"> • The environmental assessment should refer to the relevant <u>National Character Areas</u>. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity. • The ES should include a full assessment of the potential impacts of the development on local landscape character using <u>landscape assessment methodologies</u>. We encourage the use of Landscape Character Assessment (LCA) and the use of the NE guidance <u>Landscape character assessments: identify and describe landscape types - GOV.UK (www.gov.uk)</u>. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character. • A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. NE recommends use of the methodology set out in <i>Guidelines for Landscape and Visual Impact Assessment 2013</i> (3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. • In response to the Landscape Assessment Methodology described in Appendix 6A, NE welcome that the LWNL is classified as having a Very High landscape value; that landscape value and susceptibility will be assessed independently; and the clarification that a moderate effect will be classified as a significant effect. • We advise that the landscape and visual impact assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status. • The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage. This assessment should be made in alignment with the GLVIA. An important output of the assessment will be a conclusion on whether any additional or total cumulative effects will 	N/A.
--	--	------

	<p>adversely affect the landscape character or conflict with the special qualities or objectives of the LWNL or its wider landscape setting.</p> <ul style="list-style-type: none"> • NE welcome that the scope of the assessment will cover potential impacts to key views to and from the LWNL (Table 7.2, EIA Scoping Report). However, NE are not clear why people using National Trails and regionally promoted routes (beyond 3 km of the Project) are currently scoped out of the proposed assessment, and how the information presented in Figure 16.2 has been used to make this judgement. NE advise that there is the potential for views out of the LWNL to be affected by the proposed development, particularly from viewpoints at a higher elevation, and that these viewpoints may exist beyond 3km from the project. Evidence to exclude this scenario has not been presented. 	
--	--	--

8. Landscape and visual impacts

8.1 The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

8.2 The EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

8.3 A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013* (3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and National Landscapes (formerly AONBs), we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

8.4 The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

8.5 To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the

measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

8.6 The National Infrastructure Commission has also produced Design Principles [Design Principles for National Infrastructure - NIC](#) endorsed by Government in the National Infrastructure Strategy.

9. Protected species

9.1 The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

9.2 The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

9.3 Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

9.4 Applicants should check to see if a mitigation licence is required using NE guidance on licencing [NE wildlife licences](#). Applicants can also make use of Natural England's charged service [Pre Submission Screening Service](#) for a review of a draft wildlife licence application. Natural England then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. Work relating to a LONI may be undertaken via the existing Service Level Agreement between the Applicant and Natural England. [Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning](#) contains details of the LONI process.

10. District Level Licensing for great crested newts

10.1 The applicant has expressed an interest in entering into a District Level Licence (DLL) agreement.

10.2 Where strategic approaches such as DLL for GCN are used, a LONI will not be required. Instead, the developer will need to provide evidence to the Examining Authority (ExA) on how and where this approach has been used in relation to the proposal, which must include a counter-signed Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England, or a similar approval from an alternative DLL provider.

- 10.3 The DLL approach is underpinned by a strategic area assessment which includes the identification of risk zones, strategic opportunity area maps and a mechanism to ensure adequate compensation is provided regardless of the level of impact. In addition, Natural England (or an alternative DLL provider) will undertake an impact assessment, the outcome of which will be documented in the IACPC (or equivalent).
- 10.4 If no GCN surveys have been undertaken, Natural England's risk zone modelling may be relied upon. During the impact assessment, Natural England will inform the Applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN. The IACPC will also provide additional detail including information on the Proposed Development's impact on GCN and the appropriate compensation required.
- 10.5 By demonstrating that the [DLL scheme for GCN](#) will be used, consideration of GCN in the ES can be restricted to cross-referring to the Natural England (or alternative provider) IACPC as a justification as to why significant effects on GCN populations as a result of the Proposed Development would be avoided.
- 10.6 It should be noted that at present, no scheme is active in Lincolnshire. A DLL scheme is planned to be launched within Lincolnshire, however the exact timescales of this are currently unknown. Natural England would encourage engagement from the applicant regarding DLL as soon as possible, to ensure entry into the scheme is feasible for the full length of the project.

11. Priority Habitats and Species

- 11.1 Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.
- 11.2 Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).
- 11.3 An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.
- 11.4 The Environmental Statement should include details of:
- Any historical data for the site affected by the proposal (e.g. from previous surveys)
 - Additional surveys carried out as part of this proposal
 - The habitats and species present
 - The status of these habitats and species (e.g. whether priority species or habitat)
 - The direct and indirect effects of the development upon those habitats and species
 - Full details of any mitigation or compensation measures
 - Opportunities for biodiversity net gain or other environmental enhancement

12. Ancient woodland, ancient and veteran trees

- 12.1 Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 180 of the NPPF sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists. Paragraph 2.9.19 of NPS EN-5 states that '*...applicants should: ...protect as far as reasonably practicable areas of local amenity value, important existing habitats and landscape features including ancient woodland, historic hedgerows, surface and ground water sources and nature conservation areas.*'
- 12.2 Ancient Woodland has been identified within the scoping areas for the proposed development. We welcome the intention to avoid these areas as far as practicable as the route and Order Limits are defined. The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.
- 12.3 Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

13. Biodiversity net gain

- 13.1 The Environment Act 2021 includes NSIPs in the requirement for BNG, with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. It is the intention that BNG should apply to all terrestrial NSIPs accepted for examination from November 2025. Natural England welcome National Grid's commitment to deliver 10% biodiversity Net Gain across all of their construction projects in advance of this date, including this project.
- 13.2 Biodiversity Net Gain outcomes can be achieved on-site, off-site or through a combination of both, however, on-site provision should be considered first. Natural England advise that the latest version of the [biodiversity metric](#) should be used to calculate the biodiversity impact of the development. It should be noted that the same version of the BNG metric should be used pre- and post-development to ensure consistency, as each version of the metric may give altered biodiversity unit scores as the calculator is updated.
- 13.3 Natural England recognises the high opportunity for the development to deliver BNG and it is recommended that the following guidance is applied in order to achieve this:
- [Biodiversity Net Gain: Good Practice Principals for Development](#)
 - [BS 8683: 2021 Process for designing and implementing Biodiversity Net Gain](#)
- 13.4 In addition, the applicant should be aware of forthcoming guidance and legislation in relation to the Environment Act 2021, which may be released in the interim prior to submission of the DCO application.
- 13.5 In order to maximise nature recovery and target habitat enhancement where it will have the greatest local benefit it is recommended that locally identified opportunities should be acknowledged and incorporated into the design of BNG (both on and off-site). This should include any locally mapped ecological networks and priority habitats identified by City of Doncaster Council. In addition, Local Nature Recovery Strategies (LNRS) are a new mandatory system of spatial strategies for nature established by the

Environment Act 2021 which will contribute to the national Nature Recovery Network (NRN). Work is currently underway to develop these strategies, which will identify strategic priorities for nature protection, recovery, and enhancement. Given the size, scale and opportunities afforded by the application is therefore recommended that engagement with relevant local planning authorities, responsible authorities and statutory consultees (including Natural England) is undertaken to align habitat enhancement through the development with any emerging plans and policies in relation to LNRS.

14. Connecting people with nature

14.1 The applicant should have regard to NPPF Paragraph 100 which requires planning decisions to protect and enhance National Trails. The National Trails website www.nationaltrail.co.uk provides further information.

14.2 The ES should consider potential impacts on access land, common land, public rights of way (including National Trails) and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 100. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

14.3 Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

15. Soils and agricultural land quality

15.1 Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

15.2 The following issues should be considered and, where appropriate, included as part of the ES:

- The degree to which soils would be disturbed or damaged as part of the development.
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any BMV agricultural land would be impacted.

15.3 This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

15.4 Temporary displacement of soils because of the underground cable installation and temporary haul roads/ construction compounds can also result in permanent land quality change and soil damage if undertaken inappropriately. Degradation or permanent loss of BMV agricultural land should be considered in the EIA.

15.5 Further information is available in the Defra [Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science [Guidance Note Benefitting from Soil Management in Development and Construction](#).

15.6 Comments on the EIA Scoping Report:

- **Paragraph 12.4.2:** The plan should apply to all soils affected by the scheme, not just those currently in agricultural use. This reflects the Government's commitment in its 25 Year Environment Plan for all soils to be sustainably managed. It is however recognised that some soils for engineering applications, such as for bulk fill will require different management to those selected for agricultural, landscaping or ecological end uses.
- **Paragraph 12.5.3:** We welcome use of the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (2009) to guide soil management during construction. Alongside this there should also be a commitment for 'best and most versatile' (BMV) agricultural temporality required for the development to be returned back to its original ALC grade. This includes areas such as field scale ecological mitigation areas and borrow pits where reinstatement to the physical characteristics of 'best and most versatile' quality may also be required.
- **Paragraph 12.6.4:** An Outline Soil Management Plan should be provided with the ES. Natural England welcome the commitment to provide a detailed SMP post consent / pre-construction, however, an Outline SMP prepared at this stage to set out the soil management and restoration proposed to demonstrate the mitigation measures proposed in the ES have been considered and will be employed. It should be note how restoration of the substations during decommissioning would be undertaken with regards to the soil resource.
- **Paragraph 12.6.4 Point AS01:** Natural England note and welcome the inclusion of roles and responsibilities. We advise that if the development proceeds, the developer uses an appropriately experienced soil specialist to advise on, and supervise, soil handling, including identifying when soils are dry enough to be handled and how to make the best use of the different soils on site.
- Machinery to be used will need to be specified. This should accord with best practice as set out in Defra 2009 Code of Construction Practice for the Sustainable Use of

Soils on Construction Sites, namely using excavators and dump trucks. Use of bulldozers should not be permitted for any subsoils being returned to best and most versatile quality due to the high risk of soil compaction due to repeated trafficking. Bulldozers should not normally be used, other than if a modified loose tipping method of topsoil (not subsoil) replacement is employed in line with the Defra Construction Code.

- **Paragraph 12.8.2:** It is welcome that the permanent and temporary loss of soils in other (non-agricultural) land uses (second bullet) will be assessed; this should include all non-agricultural uses. The impacts on soils which are of particular importance for their carbon storage (peats and highly organic soils) should also be characterised.
- As noted previously an assessment of the impact on soil resources should be wider than just those affecting agricultural interests.
- **Paragraph 12.8.4:** Data on the presence of any agri-environment scheme can also be downloaded from the Natural England website.
- **Paragraph 12.9.3:** Duplication of 12.9.1

16. Air quality

16.1 Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg)¹. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO_x and SO₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

16.2 The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

16.3 Natural England has produced guidance for public bodies to help assess the impacts of road traffic emissions to air quality capable of affecting European Sites. [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001](#)

16.4 In addition, ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide.

16.5 Natural England therefore advises that ammonia sourced from traffic emissions should be included for assessment within the HRA. For further information please see this [report](#) from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats.

¹ [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

16.6 There are currently two models which can be used to calculate the ammonia concentration and contribution to total N deposition from road sources. One of these models is publicly available and called [CREAM](#), and there is another produced by National Highways. The current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, however, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment.

16.7 Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development
<https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions
<https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

16.8 Comments on the EIA Scoping Report:

- **Paragraph 14.4.1** references [IAQM guidance](#) for screening criteria for air quality impacts from construction dust. Ecological sites within 50m of the scoping boundary would be reviewed in line with this guidance. NE would ask for the more precautionary 200m distance. The rates at which dust particles are removed from the atmosphere depend strongly on their size. Large particles deposit rapidly near their source (within 100m) by gravitational settling; Intermediate particles are likely to travel up to 200-500m (DETR, 2000). Dust produced during the construction phase could cause smothering effects if the designated site is within approx. 200m. Smaller particles can travel up to 1km from source and some can be transported over long distances - even between different countries and continents.
- **Paragraph 14.4.3** references the [IAQM guidance](#) for indicative criteria for requiring an air quality assessment in regards to increases in road traffic. This is a more precautionary approach than we would request, so are satisfied it will capture all impacts to designated sites from additional construction traffic air pollution.

17. Water quality

17.1 The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and changes to water quantity and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels.

18. Climate change

18.1 The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development will embed Nature Based Solutions, maintain ecological networks and build resilience to climate change. The ES should also incorporate the policies as set out in NPS EN-1 relating to climate change. The NPPF also requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 174), which should be demonstrated through the ES.

Annex B: Humber Estuary Special Protection Area: non-breeding waterbird assemblage (Version 1.2, June 2023)

The Humber Estuary Special Protection Area (SPA) qualifies under article 4.2 of the European Commission Bird Directive (79/409/EEC) in that it supports an internationally important assemblage of waterbirds. Confusion can arise concerning which species to consider when assessing the Humber Estuary SPA non-breeding, waterbird assemblage feature.

Natural England recommends focusing on what are referred to as the 'main component species' of the assemblage. Main component species are defined as:

- a) All species listed individually under the assemblage feature on the SPA citation (i.e. the species that qualified in 2007 when the site was designated).
- b) Species which might not be listed on the SPA citation but occur at site levels of more than 1% of the national population according to the most recent Humber Estuary Wetland Bird Survey (WeBS) 5-year average count (currently 2017/18 - 2021/22).
- c) Species where more than 2000 individuals are present according to the most recent Humber Estuary WeBS count.

The assemblage qualification is therefore subject to change as species' populations change. It should be noted that species listed on the citation under the assemblage features, whose populations have fallen to less than 1% of the national population, retain their status as a main component species and should be considered when assessing the impacts of a project or plan on the Humber Estuary SPA.

Natural England advises that the main component species of the Humber Estuary SPA non-breeding waterbird assemblage include (June 2023):

a) *Species listed individually under the assemblage feature on the SPA citation:*

- Avocet, *Recurvirostra avosetta* (non-breeding)
- Bar-tailed godwit, *Limosa lapponica* (non-breeding)
- Bittern, *Botaurus stellaris* (non-breeding)
- **Black-tailed godwit, *Limosa limosa islandica* (non-breeding)¹**
- **Brent goose, *Branta bernicla* (non-breeding)¹**
- **Curlew, *N. arquata* (non-breeding)¹**
- **Dunlin, *Calidris alpina alpina* (non-breeding)¹**
- **Golden plover, *Pluvialis apricaria* (non-breeding)¹**
- Goldeneye, *Bucephala clangula* (non-breeding)
- Greenshank, *T. nebularia* (non-breeding)
- Grey plover, *P. squatarola* (non-breeding)
- Knot, *Calidris canutus* (non-breeding)
- **Lapwing, *Vanellus vanellus* (non-breeding)¹**
- **Mallard, *Anas platyrhynchos* (non-breeding)¹**
- Oystercatcher, *Haematopus ostralegus* (non-breeding)
- Pochard, *Aythya farina* (non-breeding)
- **Redshank, *Tringa totanus* (non-breeding)¹**
- Ringed plover, *Charadrius hiaticula* (non-breeding)
- **Ruff, *Philomachus pugnax* (non-breeding)¹**
- Sanderling, *Calidris alba* (non-breeding)

¹ Species known to use off-site supporting habitat / functionally linked land (FLL) in the non-breeding season

- Scaup, *Aythya marila* (non-breeding)
- **Shelduck, *Tadorna tadorna* (non-breeding)¹**
- **Teal, *Anas crecca* (non-breeding)¹**
- Turnstone, *Arenaria interpres* (non-breeding)
- **Whimbrel, *Numenius phaeopus* (non-breeding)¹**
- **Wigeon, *Anas Penelope* (non-breeding)¹**

And

b) Species which are not listed on the SPA citation but occur at site levels of more than 1% of the national population according to the most recent Humber Estuary Wetland Bird Survey (WeBS) 5-year average count:

- Green sandpiper, *Tringa ochropus* (non-breeding)
- **Greylag goose, *Anser anser* (non-breeding)¹**
- **Little egret, *Egretta garzetta* (non-breeding)¹**
- **Pink-footed goose, *Anser brachyrhynchus* (non-breeding)¹**
- Shoveler, *Anas clypeata* (non-breeding)
- **Crane, *Grus grus* (non-breeding)¹**

As stated above, the assemblage qualification is subject to change as species' populations change; therefore, the appropriate WeBS data should be considered in any assessment and the above list should be used as a guide only.

Please note, the advice set out above should be considered when assessing potential impacts on the waterbird assemblage feature. You will also need to consider potential impacts on species which are not considered to be non-breeding waterbirds but are listed on the citation qualifying under article 4.1 and 4.2 of the Directive. These include:

- **Hen harrier, *Circus cyaneus* (non-breeding)¹**
- **Marsh Harrier, *Circus aeruginosus* (breeding)¹**
- Little tern, *Sterna albifrons* (breeding)
- Avocet, *Recurvirostra avosetta* (breeding)
- Bittern, *Botaurus stellaris* (breeding)

The species marked ¹ **in bold text** are known to use off-site supporting habitat / functionally linked land (FLL) (e.g. arable farmland, grassland/pasture, and/or non-estuarine waterbodies) in the non-breeding season and may therefore be the most relevant for assessing potential impacts of a proposed plan/project on birds using FLL associated with the Humber Estuary SPA. However, please note that this list should be used as a guide only; usage may depend on factors such as the habitats available on the site and distance to the Humber Estuary etc. Therefore, assessments of potential impacts on birds using functionally linked land should consider all relevant species and clear justification should be provided if any species are excluded from the assessment.

¹ Species known to use off-site supporting habitat / functionally linked land (FLL) in the non-breeding season

Annex B: Humber Estuary Special Protection Area: non-breeding waterbird assemblage (Version 1.2, June 2023)

The Humber Estuary Special Protection Area (SPA) qualifies under article 4.2 of the European Commission Bird Directive (79/409/EEC) in that it supports an internationally important assemblage of waterbirds. Confusion can arise concerning which species to consider when assessing the Humber Estuary SPA non-breeding, waterbird assemblage feature.

Natural England recommends focusing on what are referred to as the 'main component species' of the assemblage. Main component species are defined as:

- a) All species listed individually under the assemblage feature on the SPA citation (i.e. the species that qualified in 2007 when the site was designated).
- b) Species which might not be listed on the SPA citation but occur at site levels of more than 1% of the national population according to the most recent Humber Estuary Wetland Bird Survey (WeBS) 5-year average count (currently 2017/18 - 2021/22).
- c) Species where more than 2000 individuals are present according to the most recent Humber Estuary WeBS count.

The assemblage qualification is therefore subject to change as species' populations change. It should be noted that species listed on the citation under the assemblage features, whose populations have fallen to less than 1% of the national population, retain their status as a main component species and should be considered when assessing the impacts of a project or plan on the Humber Estuary SPA.

Natural England advises that the main component species of the Humber Estuary SPA non-breeding waterbird assemblage include (June 2023):

a) *Species listed individually under the assemblage feature on the SPA citation:*

- Avocet, *Recurvirostra avosetta* (non-breeding)
- Bar-tailed godwit, *Limosa lapponica* (non-breeding)
- Bittern, *Botaurus stellaris* (non-breeding)
- **Black-tailed godwit, *Limosa limosa islandica* (non-breeding)¹**
- **Brent goose, *Branta bernicla* (non-breeding)¹**
- **Curlew, *N. arquata* (non-breeding)¹**
- **Dunlin, *Calidris alpina alpina* (non-breeding)¹**
- **Golden plover, *Pluvialis apricaria* (non-breeding)¹**
- Goldeneye, *Bucephala clangula* (non-breeding)
- Greenshank, *T. nebularia* (non-breeding)
- Grey plover, *P. squatarola* (non-breeding)
- Knot, *Calidris canutus* (non-breeding)
- **Lapwing, *Vanellus vanellus* (non-breeding)¹**
- **Mallard, *Anas platyrhynchos* (non-breeding)¹**
- Oystercatcher, *Haematopus ostralegus* (non-breeding)
- Pochard, *Aythya farina* (non-breeding)
- **Redshank, *Tringa totanus* (non-breeding)¹**
- Ringed plover, *Charadrius hiaticula* (non-breeding)
- **Ruff, *Philomachus pugnax* (non-breeding)¹**
- Sanderling, *Calidris alba* (non-breeding)

¹ Species known to use off-site supporting habitat / functionally linked land (FLL) in the non-breeding season

- Scaup, *Aythya marila* (non-breeding)
- **Shelduck, *Tadorna tadorna* (non-breeding)¹**
- **Teal, *Anas crecca* (non-breeding)¹**
- Turnstone, *Arenaria interpres* (non-breeding)
- **Whimbrel, *Numenius phaeopus* (non-breeding)¹**
- **Wigeon, *Anas Penelope* (non-breeding)¹**

And

b) Species which are not listed on the SPA citation but occur at site levels of more than 1% of the national population according to the most recent Humber Estuary Wetland Bird Survey (WeBS) 5-year average count:

- Green sandpiper, *Tringa ochropus* (non-breeding)
- **Greylag goose, *Anser anser* (non-breeding)¹**
- **Little egret, *Egretta garzetta* (non-breeding)¹**
- **Pink-footed goose, *Anser brachyrhynchus* (non-breeding)¹**
- Shoveler, *Anas clypeata* (non-breeding)
- **Crane, *Grus grus* (non-breeding)¹**

As stated above, the assemblage qualification is subject to change as species' populations change; therefore, the appropriate WeBS data should be considered in any assessment and the above list should be used as a guide only.

Please note, the advice set out above should be considered when assessing potential impacts on the waterbird assemblage feature. You will also need to consider potential impacts on species which are not considered to be non-breeding waterbirds but are listed on the citation qualifying under article 4.1 and 4.2 of the Directive. These include:

- **Hen harrier, *Circus cyaneus* (non-breeding)¹**
- **Marsh Harrier, *Circus aeruginosus* (breeding)¹**
- Little tern, *Sterna albifrons* (breeding)
- Avocet, *Recurvirostra avosetta* (breeding)
- Bittern, *Botaurus stellaris* (breeding)

The species marked ¹ **in bold text** are known to use off-site supporting habitat / functionally linked land (FLL) (e.g. arable farmland, grassland/pasture, and/or non-estuarine waterbodies) in the non-breeding season and may therefore be the most relevant for assessing potential impacts of a proposed plan/project on birds using FLL associated with the Humber Estuary SPA. However, please note that this list should be used as a guide only; usage may depend on factors such as the habitats available on the site and distance to the Humber Estuary etc. Therefore, assessments of potential impacts on birds using functionally linked land should consider all relevant species and clear justification should be provided if any species are excluded from the assessment.

¹ Species known to use off-site supporting habitat / functionally linked land (FLL) in the non-breeding season



Planning Development Business Unit
Castle House
Great North Road
Newark
NG24 1BY

www.newark-sherwooddc.gov.uk

Telephone: 01636 650000
Email: planning@newark-sherwooddc.gov.uk

Hannah Terry
Senior EIA Advisor
The Planning Inspectorate

27 August 2024

grimsbytowalpole@planninginspectorate.gov.uk

Dear Sir/Madam

NSIP Consultation

Proposed Works: Scoping Opinion for Application by National Grid Electricity Transmission plc (the Applicant) for an Order granting Development Consent for the Proposed Grimsby to Walpole Project (the Proposed Development). For further details see link; <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-eight-overview-of-the-nationally-significant-infrastructure-planning-process-for-members-of-the-public-and-others/>

Site Address: Grimsby To Walpole Project
Applicant: National Grid Electricity Transmission Plc
Application Ref: 24/01396/NPA

Thank you for contacting this Council regarding the above-mentioned project.

I can confirm that this Authority does not wish to offer any comments in this instance.

Yours faithfully,

Clare Walker
Senior Planner
Planning Development

Norfolk County Council's Comments to the Planning Inspectorate on the: Grimsby to Walpole – Scoping Opinion

August 2024

1. Introduction

1.1. The County Council welcomes the opportunity to comments on the above Environmental Impact Assessment (EIA) Scoping Opinion/Report. The comments below are made on a without prejudice basis and the County Council reserves the right to make further additional comments on the Development Consent Order (DCO) application during the statutory consultation periods; and at the Public Examination stage.

1.2. Socio - Economic

1.3. The County Council would expect National Grid to fully engage with those local communities affected by this development; and for the EIA and Environmental Statement (ES) to reflect that engagement. Whether through the formal DCO process or post DCO, there would be an expectation that National Grid will provide and take forward a Community Benefit Fund. Reference to a community benefit fund specifically designed to mitigate and compensate for any local impacts to residents and businesses should be scoped into the ES as part of any wider consideration of impacts on business.

1.4. The Environmental Impact Assessment (EIA) / Preliminary Environmental Information Report (PEIR) will need to assess the wider economic benefits arising from the above development both in terms of the scheme coming forward on its own and in combination with other major energy projects in the area, particularly the Eastern Green Link 3&4 (EGL3&4) project given the location and twin tracking of the substation. The EIA will need to indicate:

- Likely number of jobs created on this project – the County Council welcomes reference in Table 16.16 of the Scoping Report to and reference to job creation;
- Jobs likely to be generated locally (i.e. within Norfolk) – welcome reference in Table 16.9 of the Scoping Report to the employment effects on Tourism, which can also be scoped into the ES;
- An indication of the type of jobs created e.g. construction; engineering; and opportunities for training should be scoped into the ES. The County Council would expect the applicant to prepare a skills and employment plan/strategy as part of the DCO process and reference to this should be scoped into the ES;
- Likely duration of any construction work – should be scoped into the ES;
- Potential to use local supply chains – welcome reference in Table 16.16.

The County Council agree that routine maintenance and facilities will be carried out by NGET and therefore can be scoped out of the ES. However, the 6 full time staff to be employed by the substation has the opportunity to be generated locally and therefore could be scoped into the ES.

1.5. The ES will need to consider the potential impacts on existing businesses; and the compensation needed.

1.6. **Energy Statement**

1.7. The County Council would expect National Grid to produce an Energy Statement post consent, secured through a Planning Requirement / Condition attached to the DCO, in the same way the County Council expects an Employment and Skills Strategy and a Supply Chain Strategy.

1.8. Energy Statements will need to address / cover-off the following issues:

- Demonstrate how the proposal will provide a secure and resilience supply of electricity within the County – avoiding any potential power outages/shortages/interruption of supply;
- Demonstrate how the project aligns with the County Council's approved Climate Strategy; and emerging Energy Plan;
- Opportunities for delivering power locally using the local 132kV network (UKPN). There will need to be evidence that the developer has engaged, or will be engaging, with the local Distribution Network Operator (DNO) to explore distributing electricity generated locally;
- Exploring opportunities to deliver electricity to those areas of the County where there are demonstrable deficits in energy which is known to be holding back development; or causing local problems;
- Consider wider opportunities for decarbonising the grid within the County to deliver:
 - (a) planned housing and employment growth; and/or
 - (b) Local Projects - including self-build in rural areas;
- Consideration of delivering wider sustainable projects including:
 - (a) Electric Vehicle (EV) charging hubs
 - (b) Commercial EV charging hubs including for buses;
 - (c) Providing / unlocking additional power to local businesses and proposed growth in commercial sector – such as Lotus at Hethel.
 - (d) Localised off-grid energy solutions for housing and commercial Projects

1.9. Should you have any queries with the above comments please contact: Stephen Faulkner [REDACTED] [@norfolk.gov.uk](mailto:[REDACTED]@norfolk.gov.uk)

2. Highways

- 2.1 The Environmental Impact Assessment (EIA) scoping report states that the precise alignment of the project, location of construction compounds and the haul roads are not yet known and are still under development. Accordingly, there is insufficient detail at present to enable the Local Highway Authority to provide a full assessment of the project and the highway comments below are therefore of a general nature.
- 2.2 Works within Norfolk are identified as overhead pylons and a new substation in the vicinity of the existing Walpole substation in King's Lynn and West Norfolk District. It is noted that the applicant intends to consult with the LPAs in relation to cumulative impact from committed development.
- 2.3 The Highway Authority request that specific regard to the EGL 3 & 4 application, whose works will include two new converter stations and a new substation in the locality. The EGL 3 & 4 project will be going through the Examination stage in early / mid 2025 and as yet does not have a DCO granted. However, for the purposes of the Grimsby to Walpole project it is felt that the EGL 3 & 4 Project must be considered in cumulative impact terms (i.e. presumed consent).
- 2.4 As part of our initial discussion with the applicant the Highway Authority have asked that the formal DCO application be accompanied by a Transport Assessment (TA) and a Construction Traffic Management Plan (CTMP). It is noted that the volume of construction traffic is not yet known but that a commitment is provided within the EIA scoping report to provide a TA and CTMP. The TA needs to assess the effects of the anticipated traffic upon driver delay; severance; pedestrian delay; pedestrian amenity; accidents; road safety; and impact from abnormal loads.
- 2.5 It is also noted that the project will consider the removal / diversion of existing National Grid infrastructure and third-party utilities, again the scope of which is not known. The Highway Authority ask that the highway impact of any associated works of this nature forms part of the TA so that a comprehensive view can be taken as to overall impact.
- 2.6 It is noted that the traffic and transport effects during operation (including maintenance) are out of scope and the Highway Authority is happy to agree on that point.
- 2.7 As a general point, the overall thrust of the EIA scope relates to examining increases in traffic volumes (in particular represented as a percentage figure) and the Highway Authority wish to point out that the public highways leading to the overhead cable corridor in Norfolk are predominantly narrow minor rural lanes. Accordingly, even a small volume of traffic on these routes can have a significant impact if vehicles are unable to physically pass each other and this point needs to be considered within the CTMP.
- 2.8 The Environmental Statement will need to consider emergency access (to blue light services) associated with any temporary road closures; and/or temporary roadworks.

2.9 For further Information on highway related matters please contact John Curtis (Engineer Major and Estate Development - NSIP) Email: [REDACTED]@norfolk.gov.uk

3. **Public Rights of Way**

3.1 At this stage the County Council would recommend that the applicant takes the following into account in the ES:

- Impacts during construction- If any Public Rights of Way need to be crossed; or are impacted by any construction of supporting infrastructure; or will require a temporary closure, then this would require consultation in advance to the Highway Authority;
- Impacts during operation- If any Public Right of Way will be impacted during the operation and servicing of the project then details should be provided in advance and any proposed mitigation measures be put in place.

The DCO will likely need a Planning Requirement to address the above matters along the lines:

Public Rights of Way Strategy.—(1) No phase of the on shore works that would affect a public right of way specified in Schedule 4 (public rights of way to be temporarily stopped up) is to be undertaken until a public right of way strategy in respect of that phase and in accordance with the outline public rights of way strategy, including the specification for making up of an alternative right of way (where appropriate) has been submitted to and approved by the relevant highway authority in consultation with the relevant planning authority.

(2) Any alternative public rights of way must be implemented in accordance with the approved public rights of way strategy.

3.2 Should you have any queries with the above comments please contact: Natural Environment Team NET1@norfolk.gov.uk

4. **Historic Environment**

4.1 In general, the Historic Environment concur with the broad conclusions of the scoping report. The proposed scheme is an overhead cable route and major substation. There will be considerable impacts on below ground archaeology which will require evaluation prior to the determination of the NSIP and mitigation if consent is granted.

The Historic Environment team have the following detailed comments to make:

- 9.2.2 – Need to include a reference to the Standard for Development-led Archaeological Projects in Norfolk (see footer of this email) and any equivalent document for Lincolnshire.
- 9.3.2 – The Historic Environment team were consulted on Appendix 9B Cultural Heritage Survey Strategy on 26/07/2024, comments are

included below.

- 9.7.5 and Table 9.2 - There will be considerable impacts on below ground archaeology which will require evaluation prior to the determination of the NSIP and mitigation if consent is granted.
- 9.8.7 – For Norfolk in addition to the results of the Fenland Survey published as EAAs the HER contains a number of records relating results of Fenland Survey work which were not published in the EAA volumes. In addition, there is a physical archive of Fenland survey material accessible through the HER.
- 9.8.9 - An aerial photographic and LiDAR assessment undertaken by a recognised aerial investigation mapping specialist

In addition, the Historic Environment team have the following detailed comments on Appendix 9B Cultural Heritage Survey Strategy:

- 9B.2.1 - Needs to take into account undesignated heritage assets of equal significance to designated heritage assets.
- 9B.2.6 - Geophysical survey needs to be undertaken at a point evolution of the scheme where the results of geophysical survey can also be used to inform design decisions alongside existing baseline data. This applies especially to the converter station.
- 9B.2.14 - Overall Grimsby to Walpole is a major infrastructure scheme with potential impact that require a project wide Aerial Investigation Mapping survey carried out by a recognised specialist. The AIM survey will need to examine all existing physical and digital aerial images including Norfolk Air Photo Library collections (which can be accessed via our HER team), the Historic England Archive collection in Swindon and Environment Agency LiDAR data. Digital source include Google Earth, Bing and Apple Maps (See section 5.1.2 of the Standards for Development-Led Archaeology in Norfolk). The Cambridge University Collection of Aerial Photography (CUCAP) is still closed for physical searches, some images are available online.
- 9B.2.14 - The Norfolk Section of Grimsby to Walpole is wholly within the Borough Council of King's Lynn and West Norfolk local authority area, west Norfolk for short. The North Norfolk District Council local authority area boundary is about 40km or 25 miles northeast of the Walpoles.
- 9B.2.16 - This is a very sensible and praiseworthy approach. Ant engineering-led borehole or window samples need to be recorded by the embedded geoarchaeologist in addition to the geotechnical recording. Trying to work up geoarchaeological deposit models from engineering-led borehole logs has proved problematic on other schemes.
- 9B.2.23 – The Historic Environment team would describe almost all of the Norfolk parts of the search area for the scheme as fen-edge rather than peat or silt fen. Even in areas outside the medieval sea-bank NHER2187 there are multiple record (such as NHER 18566, NHER MNF19043) that we now know (see EAA180 <https://eaareports.org.uk/publication/report180/>) probably relate

to saltern mounds of Late-Anglo-Saxon and medieval date. Part of the slat-winning process involves substantial multi-use hearth which have the potential to be picked up by magnetometer survey. The team would consider all of the search area within Norfolk as potentially suitable for geophysical survey.

- 9B.2.24 - It helps no-one at this stage to take a prescriptive approach in relation to pre-determination evaluation trenching. Development-led archaeology on infrastructure schemes is an iterative process and decision making is evidence based. There will be a multitude of factors that need to be considered when deciding if any particular area requires pre-determination evaluation trenching, gaining as full an understanding as possible of the date and nature of any below-ground archaeology as important as its state of preservation. On other infrastructure schemes land access and windows within the agricultural cycle are as important as the point in the NSIP process that has been reached.

As previously commented in the Eastern Green link 3 and 4 scoping opinion consultation, from a purely Norfolk perspective the area currently being consulted on in relation to Grimsby to Walpole is very similar to Eastern Green Links 3 and 4. The Historic Environment team suggest a joint technical working group for Eastern Green Links 3 and 4 and the Grimsby to Walpole, including the archaeological the advisors for Norfolk and Lincolnshire.

- 4.2 Should you have any queries with the above comments please contact John Percival (Historic Environment Senior Officer) [REDACTED] [@norfolk.gov.uk](mailto:[REDACTED]@norfolk.gov.uk)

5. **Public Health**

- 5.1 Public Health Norfolk will comment only on the impact of the project as it pertains to population health in Norfolk. Public Health Norfolk welcomes the use of IEMA guidance to understand the health impacts of this project and would expect the applicant to use IEMA's Effective Scoping of Human Health in Environmental Impact Assessment and Determining Significance for Human Health in Environmental Impact Assessment, both published in November 2022. Public Health Norfolk would expect to see a full health impact assessment (HIA) using an appropriate methodology carried out for the proposal, covering both the impacts during the construction and operational phases of the project, and to set out appropriate mitigation measures if required. This would be expected to identify costs and benefits to vulnerable communities both immediately adjacent to the proposal and those in the surrounding area. Any assessment should consider both direct impacts on health from changes in air quality, dust, noise, vibration and increased traffic during construction, but also discuss the wider determinants of health such as temporary changes and disruption to public rights of way, for example, and consider both physical and mental wellbeing amongst local populations.
- 5.2 The UK Health Security Agency is the lead agency with responsibility for health threats from radiation in the UK and is a statutory consultee for Nationally Significant

Infrastructure Projects. It should be consulted regarding the appropriateness of scoping out of the health impacts of Electro Magnetic Fields (EMF) from the Environmental Statement as stated in table 17.9. Table 17.1 confirms that a mental health assessment (MHA) is not currently scoped into the health and wellbeing assessment due to the project's compliance with the appropriate standards and guidelines. Whilst actual effects might be minimal, the *perceived* effects of EMFs are still likely to have an impact on the local community's wellbeing. IEMA's guidance on Effective Scoping of Human Health in Environmental Impact Assessment states that the actual *and* perceived impacts relating to electromagnetic radiation should be considered, particularly in areas in close proximity to the project. As such Norfolk Public Health requests that the mental health impacts of the project are scoped into the assessment, with a MHA undertaken using an appropriate study area and appropriate mitigation measures set out within the Environmental Statement. Norfolk Public Health would welcome further conversations about the project's impact on mental health and wellbeing in the local area.

- 5.3 Table 4.1 acknowledges the existing grid infrastructure in the study area near Walpole and its proximity to the proposed Walpole B substation, whilst 5.5.2 mentions the proposed Eastern Green Links 3 and 4 project. Norfolk Public Health welcomes 5.5.2s focus on the cumulative impacts of these projects, and expects that the cumulative mental and physical health impacts of both the existing infrastructure and the proposed infrastructure within the study area will be given due consideration in the HIA.
- 5.4 Norfolk Public Health welcomes the inclusion of a specific chapter on human health as part of the Environmental Statement, drawing together all of the assessment's health elements into one chapter. It is expected that this is supported by a full HIA and a MHA, with appropriate mitigation measures detailed.
- 5.5 Should you have any queries with the above comments please contact Jane Locke – Prevention Policy Manager – Places (Public Health) [REDACTED] [@norfolk.gov.uk](mailto:[REDACTED]@norfolk.gov.uk)

6. Minerals and Waste

- 6.1 At this stage ahead of any detailed Environmental Statement the County Council, as Minerals and Waste Planning Authority, does not have any substantive comments to make on the scoping boundary for the proposed pylon route and substation regarding minerals and waste planning policy. This is largely because while the proposed infrastructure in Norfolk would consist of an overhead pylon route and a substation the area covered by the scoping boundary and Preferred Siting Zone does not contain any safeguarded mineral resource.
- 6.2 Should you have any queries with the above comments please contact Caroline Jeffery (Principal Planner) at [REDACTED] [@norfolk.gov.uk](mailto:[REDACTED]@norfolk.gov.uk)

7. Lead Local Flood Authority (LLFA)

- 7.1 The LLFA have focused our review primarily on the elements of the proposals which relate to Norfolk, in this case works associated with the construction of the proposed

new Walpole Substation within West Norfolk (referred to in the reports as Section 7 / Walpole B). The LLFA's understanding from Section 1 of the Scoping Report is that this NSIP proposal comprises of a new 400 kV electricity transmission line running between Grimsby and Walpole St Andrew, the construction of 2 no. new connection substations in Lincolnshire, a new substation in South Holland District and a new substation at Walpole (Walpole B) in Norfolk (with paragraph 3.5.46 identifying siting area WLP4 and WLP5 as emerging siting preferences), with the development requiring a Development Consent Order (DCO).

- 7.2 Whilst the LLFA notes that only a small element of the proposals relates to land within West Norfolk (as shown on Figure 1.1 Scoping boundary), the LLFA welcome the inclusion of Section 10 entitled 'Water Environment' and Section 11 entitled 'Geology and Hydrogeology' within the scoping report which focus upon fluvial and coastal flood risk, along with some consideration of other sources of flood risk such as surface water and groundwater. The LLFA recognise that due to the early stage at which the project is at, along with the fact that locations have yet to be finalised, consideration of flood risk and surface water management in the material provided to date is generalised at this stage, with areas of inclusion and potential issues identified but limited in scope and detail.

Notwithstanding this, the LLFA welcome that Section 10, paragraph 10.7.13 recognises the new substation would result in creation of large areas of impermeable surfacing which has potential to increase surface water run-off and flood risk to downstream receptor welcome reference to the intention for SuDS to be incorporated into the proposals where appropriate, the need for surface water drainage to be considered as part of temporary or permanent works, the need for permits to be obtained relating to watercourses works were necessary and the consideration of pollution risks. Table 4.1 outlines the constraints relating to flood risk for Section 7 such as The River Nene, waterbodies and field drainage ditches.

- 7.3 The current version of NPPF includes the requirement for all sources of flood risk to be fully assessed and this expectation has been included in the updated EN1 (paragraph 5.8.14). Therefore, the LLFA expects all sources including surface water (pluvial) and groundwater to be fully assessed in this scheme.
- 7.4 The document, particularly Sections 4.8 refers to construction and installation works, including discussion of temporary works associated with the projects relating to the cable routes, convertor stations and substation. There appears to be some consideration of surface water management from the temporary construction works such as the construction compounds, haul roads and pylon working areas. The LLFA acknowledges the improved description of the temporary works structures in section 4.8 of the report, although there is still a lack of clarity and certainty of the impermeable area proposed due to limited information regarding local site conditions. The temporary works are likely to be in place for at least four years. Therefore, the LLFA considers the level of information provided is insufficient at this stage to ensure adequate space is provided for temporary and permanent sustainable surface water drainage systems features to facilitate the proposed development.

- 7.5 The LLFA notes the comments about decommissioning in section 4.11. However, the lifespan of the different elements has not yet been indicated or where it is identified elsewhere in the report. Further comment on this matter would be appropriate.
- 7.6 The LLFA notes in Section 10.1.7 of the Scoping Report the proposals will be accompanied by an Environmental Statement supported by a Flood Risk Assessment (FRA) along with a Water Framework Directive Assessment. However, there is no commitment to preparing a Drainage Strategy for the construction and operational phases to support the Flood Risk Assessment. Further information and commitment is required.
- 7.7 In Table 10.2 the applicant identifies the sources of information for the flood risk. The LLFA reminds the applicant to obtain the sewer records to ensure that all sources of flood risk are considered.
- 7.8 In section 10.5.95, the applicant has not acknowledged ordinary watercourses in the area that are predominately managed by the IDB.
- 7.9 The LLFA notes that in section 10.6.5 in WO4, there is mention of the sizing of Culverts “will be sized to reflect the span width and the estimated flow characteristics of the watercourse under peak flow conditions and kept free from debris.” The LLFA reminds the applicant the estimated flow characteristics should be assessed using the estimated catchment area that the watercourse serves.

The LLFA strongly recommend that any EIA includes, or any planning application for development is accompanied by an FRA and a surface water drainage strategy to address:

- All sources of flood risk, including those from ordinary watercourses, surface water and groundwater to the development.
- How surface water drainage from the development will be managed on-site and show compliance with the written Ministerial Statement HCWS 161 by ensuring that Sustainable Drainage Systems (SuDS) are put in place.
- How any phasing of the development will affect the overall drainage strategy and what arrangements, temporary or otherwise, will need to be in place at each stage of the development in order to ensure the satisfactory performance of the overall surface water drainage system for the entirety of the development.

This supporting information would assess the potential for the development to increase the risk of flooding from the proposal or how surface water runoff through the addition of hard surfaces will be managed. It will show how this will be managed to ensure that the development does not increase flood risk on the site or elsewhere, in line with National Planning Policy Framework (NPPF) (Paragraph 173 and 175) and the subsequent EN-1 and EN-5.

In this particular case this would include appropriate information on:

- Sustainable Drainage Systems (SuDS) proposals in accordance with appropriate guidance including “non-statutory technical standards for

sustainable drainage systems” March 2015 by Department for Environment, Food and Rural Affairs.

- Appropriate assessment and mitigation of all sources of surface water flooding onsite/originating from offsite that may affect the development, in addition to risk of groundwater flooding.
- Provision of surface water modelling of overland flow routes and mitigation provided to show how flood risk will not be increased elsewhere. This may include temporary culverts sized for the 1% Annual Exceedance Probability (AEP) plus climate change allowance.
- At least one feasible proposal for the disposal of surface water drainage should be demonstrated and in many cases supported by the inclusion of appropriate information. It is important that the SuDS principles and hierarchies have been followed in terms of:
 - surface water disposal location, prioritised in the following order: disposal of water to shallow infiltration, to a watercourse, to a surface water sewer, level).
 - the SuDS components used within the management train (source, site and regional control) in relation to water quality and quantity.
 - identifying multifunctional benefits including amenity and biodiversity.
 - Onsite, infiltration testing, in accordance with BRE365 or equivalent should be undertaken to find out if infiltration is viable across the site and at the depth and location of any infiltration drainage feature. Infiltration testing should be undertaken 3 times in quick succession at each location.
- A surface water drainage system must be provided for the construction, operation and decommissioning of the project, including any temporary construction works.
- The drainage strategy should also contain a maintenance and management plan detailing the activities required and details of who will adopt and maintain all the surface water drainage features for the lifetime of the development.

7.10 Please note, if there are any works proposed as part of this application that are likely to affect flows in an ordinary watercourse, then the applicant is likely to need the approval of the County Council. In line with good practice, the Council seeks to avoid culverting, and its consent for such works will not normally be granted except as a means of access. It should be noted that this approval is separate from planning.

Further guidance for developers can be found on our website at <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>

7.11 Should you have any queries with any of the above LLFA comments please contact the LLFA – LLFA@norfolk.gov.uk

8. **Norfolk Fire and Rescue**

- 8.1 Norfolk Fire & Rescue Service (NFRS) response to emergency incidents should, wherever possible, not be compromised by ongoing construction works, site or road closures relating to the Grimsby to Walpole project works. Specific responses will be made as more detail is received but NFRS would urge that due consideration is given at all times to ensuring that emergency vehicles retain the ability to reach Incidents in the fastest and safest manner to protect anyone in danger.
- 8.2 NFRS as a member of the Local Resilience Forum (LRF) considers that any proposed route should not pass directly over any COMAH or high-risk site; initial look suggests this is not the case, but a more detailed investigation is being carried out currently.
- 8.3 NFRS would ask that National Grid engages with and invests in NFRS to help prepare crews for fires or rescues within high voltage electrical installations or around high voltage pylons, this may include training exercises or equipment purchases. NFRS would be looking at developer funding for these items through a S106 agreement.
- 8.4 Should you have any queries with the above comments please contact: Jennifer Schamp [REDACTED] [@norfolk.gov.uk](mailto:[REDACTED]@norfolk.gov.uk)

9. **Norfolk Property Services (NPS)**

- 9.1 If Norfolk County Council (NCC) land is required for the proposed works NPS would request National Grid consults directly with Jenna Browne ([REDACTED] [@norfolk.gov.uk](mailto:[REDACTED]@norfolk.gov.uk)) and Simone Crawford ([REDACTED] [@norfolk.gov.uk](mailto:[REDACTED]@norfolk.gov.uk)) at NCC County Farms as landowner, with regards to timescale, method of construction, impact on NCC land and compensation. NPS understands that National Grid has recently sent a questionnaire to Norfolk County Council to authorise survey work on their land.
- 9.2 Should you have any queries with the above comments please contact Richard Smith [REDACTED] [@nps.co.uk](mailto:[REDACTED]@nps.co.uk)

10. **Natural Environment**

10.1 **Arboriculture**

It is accepted that a pragmatic approach needs to be taken to data collection and the authority agree to limiting the collection of all tree data (as per BS 5837) to only Cat A and B trees. Adapting the Root Protection Area (RPA) to suit likely root morphology is acceptable (e.g. adjacent to roads, ploughed fields, streams etc). Category C trees may have a rooting area greater than 5m diameter. It is not considered overly onerous for an assessment to be made during the walkover survey when the tree / woodland categorisation is made, to determine an appropriate RPA for Cat C trees. If this is not carried out consent may be granted to development that harms trees suitable for retention. This would be particularly

problematic for trees that are not in the developer's ownership.

It should also be noted that a review of ancient woodland inventory is taking place so it may be that designations change during the lifetime of this project. It is suggested that noting the location of current trees in the same location of those mapped on the 1st edition OS map (1879 – 1886) would be a reasonable way to filter trees worthy of closer inspection for ancient or veteran tree assessment and not rely on the incomplete records. Site assessment for ancient or veteran trees must be carried out as described in the approach to the walkover survey.

Caution must be taken over the exclusive use of LIDAR (Light Detecting and Ranging) data for initial gathering of information on location of trees and hedges. LIDAR data will not detect the presence of low hedges or tree or hedge features that have recently been managed through coppicing or hedge laying at the time that the LIDAR data was captured.

10.2 Ecology

As the graduated swathe is imprecise general comments are given for this development. Ecological Survey Requirements - The preferred route should be carefully refined, taking account of all relevant ecological impacts, including locally designated wildlife sites. It is also important that any desk study should include the collation of all relevant habitat and species data from the Norfolk Biodiversity Information Service (NBIS), including all Local Wildlife Site information. All surveys carried out will require to be up to date, therefore given the potential timescales involved with such a scheme, it may be necessary to carry out regular surveys throughout the course of the design stage to ensure all surveys are no more than 18 months old.

Ecological Reporting - The scheme will need to consider all ecological effects, both during construction and in-operation (e.g. bird collision risk etc). The scheme should adhere to the ecological mitigation hierarchy and avoid impacts in the first instance. Where impacts cannot be avoided, mitigation measures will need to be identified, and compensation provided. Impacts to Irreplaceable Habitats (e.g. Ancient Woodland) should be fully avoided. In addition, (dependant on timeline) the development will be expected to deliver the mandatory minimum 10% Biodiversity Net Gain (from late November 2025 for NSIPS) and contribute towards the Local Nature Recovery Network.

10.3 Landscape

A full Landscape and Visual Impact Assessment should be undertaken, including where necessary a Townscape Assessment. This should consider all potential impacts, both during construction and in-operation, and the cumulative impacts. Where possible cables should be undergrounded to minimise landscape and visual impacts.

Impacts on the Landscape Character and Visual Amenity should where possible be avoided this could be through consideration of fine tuning the route or looking at sensitive areas where undergrounding may be more suitable. Irreplaceable

landscape features such as ancient woodland should be fully avoided.

Every effort should be made to underground the proposed 400 kV line entering Norfolk. In addition consideration should also be given to ways to minimise impacts; this could be through the use of **lower pylons** or pylons of an alternative design (i.e. where under-grounding is not feasible).

Cumulative impact should be avoided, and National Grid should consider whether there are opportunities to reconfigure; rationalise or underground any existing electricity network infrastructure (in line with para 2.11.2 – 2.11.6 of NPS EN-5);

Where impacts cannot be avoided then **mitigation measures** will need to be identified. Whilst advanced planting and screening will not minimise all impacts, carefully planned incremental planting can be effective at minimising and softening the appearance of infrastructure in the landscape. Often layered planting starting some distance away can help to break up extensive views. This will be particularly important when considering the screening options for the substation at Walpole where landscape and visual impacts have the potential to be significantly adverse. The massing, location and scale of the substation should be considered to ensure both short distance and long-distance views are taken into account. In addition to layered planting consideration should be given to finishes, orientation of elements and siting of elements within the site to avoid continuous change on the horizon.

- 10.4 The above comments from the Ecology and Landscape team were made at the non-statutory consultation stage; these have been reiterated as they require scoping as part of the EIA.

Should you have any queries with the above Natural Environment comments please contact the Natural Environment Team at neti@norfolk.gov.uk

Working in partnership

**PLANNING ACT 2008 (as amended)
INFRASTRUCTURE PLANNING (EXAMINATION
PROCEDURE) RULES 2010**

**SUBJECT: Grimsby to Walpole
APPLICANT: National Grid Electricity Transmission PLC**

**INTERESTED PARTY:
NORTH EAST LINCOLNSHIRE COUNCIL**

OUR REF: DM/0072/24/DCO

Response to the EIA Scoping from North East Lincolnshire Council

Working in partnership

Subject	NELC Comments
<p>EIA Approach and Methodology</p>	<p>NELC have reviewed the Approach and Methodology chapter of the EIA Scoping document and acknowledge its contents. It is considered that the following needs to be taken into account.</p> <p>A more detailed review and explanation as to the alternatives to the use of an overhead line would be welcomed. In particular out to sea or underground. Reference is made to alternative studies which have reviewed this but it is considered that the EIA should give further analysis as to the alternatives that have been scoped.</p> <p>Such an assessment is especially needed in light of the principal concerns highlighted by North East Council at a Full Council meeting in March 2024 about the line’s visual and environmental impacts. Link attached.</p> <p>https://www.nelincs.gov.uk/council-urges-public-and-community-groups-to-have-their-say-on-national-grid-pylon-proposals/</p>
<p>Landscape and visual</p>	<p>The headline methodology is considered acceptable, but it is considered that the viewpoints need to be agreed and we would welcome engagement with the Council’s Trees and Woodlands Officer. It is considered that views back to the Wolds AONB need to be considered in more depth particularly from the A16. It is also considered that the design of the pylons and the potential for a better design needs greater analysis and thought. In terms of landscape and planting there is a need for greater analysis of any replacement species and locations and also the long-term management of landscaping. Reference is made in the scoping to a more restrictive approach to planting and limited after management. Consideration needs to be given to planting which is not constrained by operational efficiency. Opportunities to improve and enhance landscaping should be included.</p> <p>It is considered that there should be a clear assessment of the cumulative impacts with existing and proposed developments.</p>

Working in partnership

<p>Ecology</p>	<p>The headline methodology is agreed but it is considered that the following needs to be taken into account.</p> <p>Section one is at least within 500m of a number of known blow well sites, as recorded this year for the Viking Pipeline DCO. The area covered by section one is likely to have more. As a regionally, if not nationally significant, habitat and feature, they must be given consideration and avoided and fully assessed.</p> <p>Section one scoping boundary is adjacent to wet woodland and a major blow well site at Town’s Holt, Freshney Parkway South LWS, which is planned to be a Local Nature Reserve (LNR). It is adjacent to the scoping boundary, but impacts must be considered as if it was an LNR.</p> <p>The identified Priority Habitat of rivers should have it noted that this includes chalk streams.</p> <p>There are at least four Great Crested Newts (GCN) breeding ponds in Ashby-cum-Fenby and GCN are present in the wider surrounding area. This has not been noted in the section Amphibians 8.5.36 and must be considered.</p> <p>Section Control and Management Measures, 8.6.9, GG04 states that the CEMP shall include measures to manage dust, waste, water, noise, vibration and soil during construction. It must also include lighting if use is anticipated, however, it is noted that it is included in point GG11.</p> <p>It needs to be assessed as to what number of winter bird surveys are required.</p> <p>It is agreed that there needs to be on-going stakeholder engagement to include the Council’s Ecologist and Natural England.</p>
<p>Cultural Heritage</p>	<p>It is considered that the EIA scoping has covered all of the elements that would be expected at this stage in the project. It takes into account both the potential for below ground archaeology and the potential setting issues.</p>

Working in partnership

	<p>However, the study area does not cover the Grimsby Dock Tower Grade 1 listed building which, due to the nature and design of the building, has an extensive setting that extends well into the study area. This Designated Heritage Asset must be included in the assessment. It is also considered that the assessment should consider in more depth cultural heritage and the impacts of the development on this matter.</p> <p>It is strongly recommended that the Heritage Officer and Historic England are engaged with at all stages relevant to heritage in the North East Lincolnshire area as opposed to ‘as required’ as described in para 9.3.1.</p>
<p>Water Environment</p>	<p>At this stage the scoping sets out an acceptable methodology. However specific comments are provided as follows.</p> <p>Section 10.1.7 – It is considered that a drainage strategy should be included within the assessments.</p> <p>Section 10.5.52 – The surface water flow paths should be maintained. If ground levels need to be raised, assessment of flows paths must be undertaken to ensure that surface water flow paths are not blocked. This would apply to all areas, including temporary roads and particularly to the permanent substation in section 1.</p> <p>It is strongly recommended that ongoing engagement continues as set out with the Environment Agency, Anglian Water and the Council as the Lead Local Flood Authority.</p>
<p>Geology and Hydrology</p>	<p>The scoping sets out an appropriate methodology at this stage. The reference to ongoing engagement with key consultees which includes the Environment Agency is noted. Engagement should include the Council’s Environmental Protection Team.</p>
<p>Agriculture and Soils</p>	<p>It is agreed that there needs to be a full assessment of agriculture soils and agricultural land holdings to understand the extent of BMV land and sensitive soils which would be affected by the Project during the</p>

Working in partnership

	<p>construction phase. It is recommended that this analysis should be informed through discussions with Natural England. It is considered that as there is no intent at this stage for the project to be decommissioned and as much of the effects on agricultural land will likely be permanent, the assessment is imperative.</p>
<p>Highways Traffic and Transport</p>	<p>It is important that the safe and smooth running of the highway network is maintained throughout the development and in particular for this project, the construction phase. A detailed Traffic Assessment will be required to understand the full impacts on the network and how any adverse impacts can be mitigated for. This should be scoped with the Highway Authority for completeness. Specific regard must be had to other committed developments and their demand on the highway network through their construction and operation phases. It should be noted by the applicant there is a significant number of committed developments and DCO's within NELC at this time.</p> <p>It is imperative that the DCO must recognise from the start of the process that the Highway Authority need engagement and control over works within the Highway.</p> <p>Where Public Rights of Way are to be impacted, early engagement the Council's Rights of Way Officer is strongly recommended.</p>
<p>Air Quality</p>	<p>The air quality methodology is noted, and the dust control and management measures stated within the assessment and the incorporation of these measures into the CEMP would be welcomed. There will be a need to ensure any cumulative effects are properly considered, particularly where projects may come on stream simultaneously.</p>
<p>Noise and Vibration</p>	<p>The findings of the desktop and baseline conditions for noise levels are noted. Methodologies are acknowledged for the management of noise and vibration during construction and operation. It is considered that assessments need to consider existing and proposed developments including those allocations in the North East Lincolnshire Local Plan 2013 to 2032 (Adopted 2018). In particular</p>

Working in partnership

	<p>reference to the Grimsby West strategic housing site which is adjacent to the proposed substation area and most northern section of the line. It is agreed that further background noise assessments are required. These to be informed by discussion with North East Lincolnshire’s Environmental Health Officers. Whilst the methodologies are acknowledged the construction management procedures should factor in the use of the following construction hours:</p> <p>Weekdays 8.00am to 6.00pm Saturdays 8.00am to 1.00pm No working on Sundays and Public Holidays</p>
<p>Socio-economics, Recreation and Tourism</p>	<p>The methodology is noted, and it is considered that this should be expanded on. In particular the wider socio-economic benefits.</p> <p>Greater analysis of the North East Lincolnshire industrial base and links to the Humber Estuary which is seen as the Energy Estuary is required. How does this infrastructure link to existing and proposed developments and other existing and planned infrastructure such as carbon capture, and off-shore wind connections. What are the benefits of such an infrastructure cluster and would the grid help to realise industrial and economic development. How would it link to development along the South Humber Bank and the Port of Grimsby which is a major centre for off-shore wind operation and maintenance.</p> <p>The reference to the impact of construction workers is acknowledged and this should be in combination with other major projects. In particular other DCO projects including IGET, RWE, and Viking CSC.</p>
<p>Health and Wellbeing</p>	<p>The methodology is acknowledged. For the operational stage it is acknowledged that an EMF report will be prepared as part of the project and this is welcomed. However, it is considered that this EMF risk and the perceived risk is a major consideration and should not be scoped out. Perceived risk and adverse effect on mental health can be as damaging as actual risk and is inextricably linked to the residential amenity that occupiers of nearby dwellings should reasonably be expected to enjoy. It can</p>

Working in partnership

	<p>also apply to the occupiers of business premises. As residential and local amenity is such an important matter it is considered that this should be scoped in.</p>
<p>Climate Change – Drainage and Flood Risk</p>	<p>It is considered that the outline methodology is acceptable to look to meet the drainage considerations from a North East Lincolnshire perspective. However, it will be important to take into account the comments of the Environment Agency on this scoping.</p> <p>In more detail the following is noted.</p> <p>Section 4.8.15 – Agreed with the use of SuDS even as temporary measures, if possible.</p> <p>Section 4.8.18 – Outside of the IDBs districts, the consent for any culverts would be with North East Lincolnshire as the Land Drainage Authority.</p> <p>Section 4.8.19 & 20 – Use of temporary bridges is acceptable as this can cause less disruption to the watercourse than culverts.</p>
<p>Major Accidents and Disaster</p>	<p>It is considered that there should be greater emphasis and clearer detail on the risk of topple over of the pylons, loss of wires and fire risk. It is considered that aviation risk should be assessed and Humberside Airport and MOD should be consulted.</p>

From: [BCW Planning](#)
To: [Grimsby to Walpole](#)
Subject: RE: EN020036 - Grimsby to Walpole Project – EIA Scoping and Consultation & Regulation 11 Notification
Date: 13 August 2024 12:35:39
Attachments: [image006.jpg](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)

You don't often get email from planning.bcw@northnorthants.gov.uk. [Learn why this is important](#)

Good Afternoon,

We advise to no objection

Kind Regards,

Cerys Walker | **Administrative/Technical Officer**

North Northamptonshire Council

Swanspool House, Doddington Road Wellingborough, Northants NN8 1BP

T: [REDACTED]

Twitter: @NNorthantsC

Facebook: @NorthNorthants

Web: www.northnorthants.gov.uk



From: Grimsby to Walpole <grimsbytowalpole@planninginspectorate.gov.uk>

Sent: Tuesday, August 6, 2024 1:56 PM

To: CBC Planning Services <PlanningServices.cbc@northnorthants.gov.uk>; ENC PLANNING <PLANNING.ENC@northnorthants.gov.uk>; KBC Planning <planning.kbc@northnorthants.gov.uk>; BCW Planning <Planning.BCW@northnorthants.gov.uk>

Subject: EN020036 - Grimsby to Walpole Project – EIA Scoping and Consultation & Regulation 11 Notification

[CAUTION: EXTERNAL EMAIL] This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam

Please see attached correspondence on the proposed Grimsby to Walpole Project.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **2 September 2024**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Hannah Terry

Please note my working days are Monday to Thursday. I do not work on Fridays.



Hannah Terry
Senior EIA Advisor
The Planning Inspectorate

 @PINSgov  The Planning Inspectorate  planninginspectorate.gov.uk

Ensuring **fairness**, **openness** and **impartiality** across all our services

This communication does not constitute legal advice.
Please view our [Information Charter](#) before sending information to the Planning Inspectorate. Our [Customer Privacy Notice](#) sets out how we handle personal data in accordance with the law.

[Please take a moment to review the **Planning Inspectorate's Privacy Notice** which can be accessed by clicking this link.](#)

Please note that the contents of this email and any attachments are privileged and/or confidential and intended solely for the use of the intended recipient. If you are not the intended recipient of this email and its attachments, you must take no action based upon them, nor must you copy or show them to anyone. Please contact the sender if you believe you have received this email in error and then delete this email from your system.

Recipients should note that e-mail traffic on Planning Inspectorate systems is subject to monitoring, recording and auditing to secure the effective operation of the system and for other lawful purposes. The Planning Inspectorate has taken steps to keep this e-mail and any attachments free from viruses. It accepts no liability for any loss or damage caused as a result of any virus being passed on. It is the responsibility of the recipient to perform all necessary checks.

The statements expressed in this e-mail are personal and do not necessarily reflect the opinions or policies of the Inspectorate.

DPC:76616c646f72

From: [Before You Dig](#)
To: [Grimsby to Walpole](#)
Subject: RE: EXT:EN020036 - Grimsby to Walpole Project – EIA Scoping and Consultation & Regulation 11 Notification
Date: 06 August 2024 13:58:34
Attachments: [~WRD0000.jpg](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)

You don't often get email from beforeyoudig@northerngas.co.uk. [Learn why this is important](#)

Good Afternoon,

Northern Gas Networks do not cover this area.

Please forward your enquiry to plantprotection@cadentgas.com

You can use the link below to check which gas network operator covers each area before submission to ensure you have the correct network;

<https://www.energynetworks.org/operating-the-networks/whos-my-network-operator>

Kind regards,

Lucy McMahon

**Administration Assistant
Before You Dig
Northern Gas Networks
1st Floor, 1 Emperor Way
Doxford Park
Sunderland
SR3 3XR**

My working days are Monday, Tuesday & Wednesday 08:00am – 16:30pm

Before You Dig: 0800 040 7766 (option 5)

www.northerngasnetworks.co.uk

facebook.com/northerngasnetworks

twitter.com/ngngas

Alternative contact:

beforeyoudig@northerngas.co.uk



Get involved! Have your say in the future of your gas network and win great prizes, by taking part in our BIG customer survey at together.northerngasnetworks.co.uk Keep posted to take part in a range of activities from workshops to roadshows. Together, we are the network.

Northern Gas Networks Limited (05167070) | Northern Gas Networks Operations Limited (03528783) | Northern Gas Networks Holdings Limited (05213525) | Northern Gas Networks Pensions Trustee Limited (05424249) | Northern Gas Networks Finance Plc (05575923). **Registered address:** 1100 Century Way, Thorpe Park Business Park, Colton, Leeds LS15 8TU. Northern Gas Networks Pension Funding Limited Partnership (SL032251). **Registered address:** 1st Floor Citypoint, 65 Haymarket Terrace, Edinburgh, Scotland, EH12 5HD. **For information on how we use your details please**

From: Grimsby to Walpole <grimsbytowalpole@planninginspectorate.gov.uk>

Sent: Tuesday, August 6, 2024 1:39 PM

Subject: EXT:EN020036 - Grimsby to Walpole Project – EIA Scoping and Consultation & Regulation 11 Notification

You don't often get email from grimsbytowalpole@planninginspectorate.gov.uk. [Learn why this is important](#)

External email! - Think before you click

Dear Sir/Madam

Please see attached correspondence on the proposed Grimsby to Walpole Project.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **2 September 2024**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Hannah Terry

Please note my working days are Monday to Thursday. I do not work on Fridays.

Hannah Terry
Senior EIA Advisor

Orby Parish Council comments/suggestions/objections with respect to PINS Scoping Opinion Grimsby to Walpole (EN020036)

We believe that the plan for pylons is destructive and outdated and will cause irreversible damage to the countryside, wildlife habitats, and local communities and we find the proposal will be detrimental to our beautiful countryside.

We fully support the need to generate renewable and low carbon electricity to meet local and national Net Zero ambitions.

However, there are more suitable, sustainable and modern alternatives for the network that have not been properly investigated and presented, such as undersea cable routes.

In more detail:

National Grid's (NG's) Scoping Report is ostensibly for ONE line of 50m 400kV pylons from Grimsby to Walpole, with new substations at Grimsby and Walpole, and two at Alford (so-called 'southwest of Mablethorpe' in all NG documents). The carrying capacity of a single 400kV pylon is less than 7GW. The new projects cited by NG to justify the project total 9.764GW. To accommodate this NG would need at least TWO lines of pylons. Power would also be routed (south) via Grimsby (up to 7GW) into Alford. If this is approved, it is likely that projects already in the planning process (like ODOW) will be rerouted into the Alford substations (why would any project bury cables from Alford to Walpole when there is no need?).

In addition, there are numerous large scale (1GW+) solar farms mooted along the proposed route which will also require connection (hence all the rather vague LCS's incorporated in this document). The Alford substations will need capacity for 22GW plus (source NG). Please note that there is no local requirement for any of this new renewable generation, we are already in net spill.

To accommodate all this proposed generation, NG would require TWO 400kV lines from Grimsby to Alford and THREE 400kV lines from Alford to Walpole. Because Grids are designed largely in a 'boxed format' NG would then require a new 400kV line from Alford to Lincoln. According to NG, some 30GW is due to be brought into the B8 boundary. Recently, HMG announced even more ambitious licensing of additional renewable generation, some of which may be landed into the Eastern coast. Alford alone could easily end up a 40GW plus hub. Accommodating all the export routes south and the various associated onshore facilities would entail vast areas of land being dedicated to electrical facilities. We believe that this proposed ONE set of 400kV pylons and substations really represents the first enabling step for the conversion of vast swathes of rural Lincolnshire (and beyond), into a series of industrial-scale electrical complexes connected by multiple sets of 50m pylons.

To cover the true scale and potential impact of this project, we therefore respectfully request that the Scoping includes the following:

1. The Scoping Area should be extended to cover the whole of the 'Overhead Study Area' as shown in Figure 3.2 of the Scoping Report. (Also, the 'Overhead Study Area' should be enlarged to cover the whole of the potential pylon/associated infrastructure corridors – this is not currently the case – see Fig, 3.2);

2. The PEIR, EIA and ES study area should extend 5kms from the boundary of the 'Overhead Study Area' and be extended, where appropriate, to the 'Limit of Deviation'. The topography of the route means that this development will have a significant visual and cumulative impact as the landscape, being mainly flat, is highly sensitive to change. The significance of 50m pylons is not mitigated by distance in a flat landscape of large arable fields. If the 'apparent height' of a 50m pylon at 5km is 0.61cm as claimed by the applicant, then a 25m building would appear as 0.31cm. Most structures in the landscape along the route(s) are isolated farm buildings less than 15m high, therefore the visual and cumulative impact of even a single line of pylons and associated infrastructure would be significant. This development would change the landscape character throughout the route;

3. Because of the impact of the proposed development in a (mainly) sparsely populated rural area, all 'additional measures', 'secondary measures', 'ancillary development' and 'associated ancillary development' should be included in the Scoping and anything (apart from temporary measures necessary for construction), not included within the Scoping and EIA should not be accepted as part of the DCO. Otherwise, there is a risk that additional lines of pylons and substations (as illustrated in Figures 3.2 & 3.4) are included in the final DCO Application without any public consultation or environmental impact assessment;

4. The Visual Impact study area should be extended to the coast (in particular around the Gibraltar Point NNR); and the eastern edge of the Lincolnshire Wolds AONB;

5. Several Heritage assets of national importance (Grade 1), which are likely to be seriously impacted (i.e. significantly harmed) by the proposed development are not included in the current study area. All Heritage assets (Listed Buildings, scheduled monuments and listed Parks & Gardens) within 5kms of the 'Overhead Study Area' should be included in the PEIR/EIA/ES;

6. Photomontages and wirelines for the Visual Impact Assessment should be from viewpoints specifically agreed with local communities from every parish within the Visual Impact Study Area (e.g. Parish Councils; Parochial Church Councils/District Church Councils; walkers/ramblers associations; Parish Meetings; residents etc.; i.e. 'the different groups of people likely to be affected by the project' (Scoping Report 7.18.17);

7. Photomontages and wirelines should be provided in hard copy (printed at the optimal size for viewing), to all Parishes within the Visual Impact study area (minimum 10km radius from the Scoping Area); and on request to any member of the public. Photomontages cannot be properly used by a layperson on a computer screen. (Also, many areas within the route are Wi-Fi blackspots and there is no superfast broadband, so the files are too large to open).

8. All photomontages and wirelines should conform to the Nature Scotland (2017 and updates) Visual Representation of Wind Farms Guidelines. Panoramic photomontages should be accompanied by a single photomontage from the same viewpoint taken at 50mm focal length.

9. There is an overlap between substations LCS 6 & 8 (i.e. LCSB) in the Scoping Report (Figure 3.4), and the siting zone for the convertor station and direct current switching station in National Grid's EGL 3&4 Project Background Document. NG should make it clear which project the proposed developments belong to. Since, if the Grimsby to Walpole Project is consented, EGL 3 & 4 will be added to the overhead lines (Table 4.3), rather than taking the buried route to Weston Marsh (as currently proposed), then it would surely be most cost-

effective to combine the two projects at this stage and extend the Scoping Area and EIA appropriately.

10. Full flood risk assessment for inundation of seawater relating to storm surges; collapse of levées; breach of riverbanks; flash flooding etc. should be conducted for the whole (revised) Scoping Area.

11. Finally, there is a serious issue of broadband availability along the whole route, therefore we request that in addition to providing the photomontages (see 7 above), the applicant makes all consultation documents freely available in hard copy at locations open to the public during working hours, and at weekends (many libraries in the affected area, Alford for example, only open 4 days a week). The documents should also be made available on free memory sticks provided by NG at public information days, and on request. Otherwise, many of those most affected by the proposed development will be unable to access the information required to comment on it.

Potential impacts on the landscape:

- It will carve off the nearby popular coastal resorts of Mablethorpe, Sutton-on-Sea, Sandilands and Anderby Creek from the Lincolnshire Wolds National Landscape (an area of outstanding natural beauty) and may mean our Parish's Tourists, of which local businesses depend, will in future choose to visit The Wolds, or The Coast, rather than holidaying in the Parish to visit both. There needs to be a detailed impact assessment on the Lincolnshire Wolds area of outstanding natural beauty (AONB)
- As in our response at the 'non-statutory consultation' phase to National Grid, we do not feel National Grid have adequately accurately assessed other options of an offshore integrated grid or undergrounding as alternatives.
- The uncertainty around the siting of proposed pylons and substations should be cleared up so that residents understand exactly the potential impacts.
- We support cleaner and more secure forms of energy but not at any cost to the environment and residents. Pylons are an archaic infrastructure system blighting the landscape for decades.

Potential impacts on natural environments:

- The EMF of the pylons will interfere with bee hives on land beneath (which are needed for pollination of crops) and bats navigation, which reside in Rigsby Wood and Ailby Plantation.
- Risks harming our Parish' Barn Owl population and migrating Canadian Geese that fly over the Parish could be adversely affected too.
- We are close to a migratory superhighway for millions of birds, the cables would risk their harm too.
- The land in the Parish is predominantly agricultural and any soil compaction during construction would affect the productivity going forwards.
- The lifespan of the infrastructure needs careful consideration in regard of being subject to strong gusts of winds off the North Sea/regular Sea Fret exposure.
- Impact on protected species such as great crested newts, reptiles, birds, water voles, badgers and bats.

Potential impacts on residents:

- The effect of land and property owners' mental health is of great concern, adding to the stress both mentally and physically farmers are already under. 100% of homeowners in the Parish voted against this proposal at our Parish Meeting in February 2024.
- Adverse impact on value/profitability of the Parish's (and surrounding) land and property.

Devaluation of property putting residents at risk of negative equity.

- Noise pollution from Sea Fret hitting the cables on a regular basis and this being more likely overnight when people are trying to sleep.
- Disruption for residents in their commute to school/work (and tourists in their holiday travel) during the construction period.
- What steps will be taken to prevent Mirco-shocks for residents & tourists who walk, cycle, horse-ride or fish in the area?
- Light pollution adversely impacting residents as properties of a particular rural nature with far reaching views.
- Where exactly will the two proposed substations be located? Require a detailed explanation of construction activities especially if any will take place at night and the landscape measures to be taken around the sub stations and pylons. There will be an adverse impact on residents in terms of light, views and noise.

Potential impacts on businesses:

- Our predominant industries are Farming & Tourism. Disruption to holiday makers during construction and reduced appeal of the region once constructed will mean reduced visitor numbers = less profitability/viability = less employment for local population.
- Loss of prime agricultural land / land less productive due to soil compaction/disturbance, giving concern for future food security. What steps will be taken to ensure that harvests can continue during construction?
- Need to understand the effect of maintenance via helicopter, vehicle and drone activities.

Potential impacts on existing infrastructure:

- During construction there will be many large heavy vehicles on narrow country lanes, what steps will be taken to mitigate the disruption to rural transport links, damage to the already crumbling county roads?
- Potential for narrow lanes to subside under the weight of heavy plant possibly contaminating watercourses and causing flood risk.
- Traffic impacts should be assessed for both construction and operational activities.

Potential safety risks:

- What measures will be put in place during construction and beyond to mitigate the risks to workforce and residents, given that many areas are rural and emergency response times slow?
- Flying exercises by military in the area and the Lincolnshire Gliding Club at nearby Strubby North Airfield that sometimes has craft pass over to our Parish.

- Has a fire risk assessment of the pylons and wires been conducted especially since they run across agricultural land which is highly flammable both pre- and post-harvest of grain crops.



Telephone: 01733 453410 (9am - 1pm Mon, Wed,
Fri)
Email: planningcontrol@peterborough.gov.uk
Case Officer: Mr A O Jones
Our Ref: 24/00997/CONSUL
Your Ref:

Hannah Terry
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Peterborough Direct: 

15 August 2024

Dear Sir/Madam

Planning enquiry

Proposal: Consultation on propopsed Proposed Grimsby to Walpole project

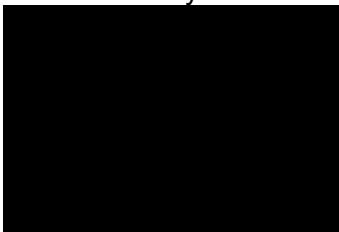
Site address: Out Of Area Town Hall Bridge Street Peterborough

Further to your enquiry received on 6 August 2024, in respect of the above, the Local Planning Authority makes the following comments:

The proposal site comes no closer than appproximately 10km from the Peterborough City Council and as such, we can confirm that we have no comments.

I trust that the above advice is of use however should you have any further queries, please do not hesitate to contact me on the details shown at the top of this letter.

Yours faithfully



Mr A O Jones
Principal Minerals and Waste Officer

From: [Fran Newton](#)
To: [Grimsby to Walpole](#)
Subject: Quadring Parish Council
Date: 14 August 2024 14:01:36

You don't often get email from quadringparishclerk@gmail.com. [Learn why this is important](#)

Good Afternoon

My Council have instructed me write with reference to this Planning application

The Council feel that this project will have a negative impact on the local area whilst bring little or no benefit to residents.

This area is mainly agricultural and the loss of food producing land in an unstable world is concerning. The skies are big and open and with the proposed pylons the skyline will be changed for ever!

The power being generated by this project will not be serving this area- the local residents will see no changes in the costs of their power

Kind regards

Fran

Fran Newton
Clerk and Responsible Financial Officer
Quadring Parish Council
Correspondence address: Nelsons Cottage, Clough Road, Gosberton Clough, Spalding PE11 4JN
Tel: 07920 290012
<http://parishes.lincolnshire.gov.uk/Quadring/>

Rigsby with Ailby Parish Scoping Opinion

By Email: grimsbytowalpole@planninginspectorate.gov.uk (before deadline 4th September 2024).

Potential impacts on the landscape:

- It will carve off the nearby popular coastal resorts of Mablethorpe, Sutton-on-Sea, Sandilands and Anderby Creek from the Lincolnshire Wolds National Landscape (an area of outstanding natural beauty) and may mean our Parish's Tourists, of which local businesses depend, will in future choose to visit The Wolds, or The Coast, rather than holidaying in the Parish to visit both. There needs to be a detailed impact assessment on the Lincolnshire Wolds area of outstanding natural beauty (AONB)
- As Rigsby is on a ridge on the edge of The Wolds, looking down on a predominately flat area to the coast, the views from the edge of The Wolds will be disproportionately affected.
- As in our response at the 'non-statutory consultation' phase to National Grid, we do not feel National Grid have adequately & accurately assessed other options of an offshore integrated grid or undergrounding as alternatives.
- The uncertainty around the siting of proposed pylons and substations should be cleared up so that residents understand exactly the potential impacts.
- We support cleaner and more secure forms of energy but not at any cost to the environment and residents. Pylons are an archaic infrastructure system blighting the landscape for decades.

Potential impacts on natural environments:

- The EMF of the pylons will interfere with bee hives on land beneath (which are needed for pollination of crops) and bats navigation, which reside in Rigsby Wood and Ailby Plantation.
- Risks harming our Parish' Barn Owl population and migrating Canadian Geese that fly over the Parish could be adversely affected too.
- We are close to a migratory superhighway for millions of birds, the cables would risk their harm too.
- The land in the Parish is predominantly agricultural and any soil compaction during construction would affect the productivity going forwards.
- The lifespan of the infrastructure needs careful consideration in regard of being subject to strong gusts of winds off the North Sea/regular Sea Fret exposure.
- Impact on protected species such as great crested newts, reptiles, birds, water voles, badgers and bats.

Potential impacts on residents:

- The effect of land and property owners' mental health is of great concern, adding to the stress both mentally and physically farmers are already under. 100% of homeowners in the Parish voted against this proposal at our Parish Meeting in February 2024.
- Adverse impact on value/profitability of the Parish's (and surrounding) land and property. Devaluation of property putting residents at risk of negative equity.
- Noise pollution from Sea Fret hitting the cables on a regular basis and this being more likely overnight when people are trying to sleep.
- Disruption for residents in their commute to school/work (and tourists in their holiday travel) during the construction period.

- What steps will be taken to prevent Micro-shocks for residents & tourists who walk, cycle, horse-ride or fish in the area?
- Light pollution adversely impacting residents as properties of a particular rural nature with far reaching views.
- Where exactly will the two proposed substations be located? Require a detailed explanation of construction activities especially if any will take place at night and the landscape measures to be taken around the sub stations and pylons. There will be an adverse impact on residents in terms of light, views and noise.

Potential impacts on businesses:

- Our predominant industries are Farming & Tourism. Disruption to holiday makers during construction and reduced appeal of the region once constructed will mean reduced visitor numbers = less profitability/viability = less employment for local population.
- Loss of prime agricultural land / land less productive due to soil compaction/disturbance, giving concern for future food security. What steps will be taken to ensure that harvests can continue during construction?
- Need to understand the effect of maintenance via helicopter, vehicle and drone activities.

Potential impacts on existing infrastructure:

- During construction there will be many large heavy vehicles on narrow country lanes, what steps will be taken to mitigate the disruption to rural transport links, damage to the already crumbling county roads?
- Potential for narrow lanes to subside under the weight of heavy plant possibly contaminating watercourses and causing flood risk.
- Traffic impacts should be assessed for both construction and operational activities.

Potential safety risks:

- What measures will be put in place during construction and beyond to mitigate the risks to workforce and residents, given that many areas are rural and emergency response times are slow?
- Flying exercises by military in the area and the Lincolnshire Gliding Club at nearby Strubby North Airfield that sometimes has craft pass over to our Parish.
- Has a fire risk assessment of the pylons and wires been conducted especially since they run across agricultural land which is highly flammable both pre- and post-harvest of grain crops.



Proposed DCO Application by National Grid Energy Transmission (NGET) for the Grimsby to Walpole Project

Royal Mail response to ES Scoping Consultation

Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.

Royal Mail's advisor BNP Paribas Real Estate has reviewed the ES Scoping Report for this scheme dated August 2024. There are eleven operational Royal Mail properties within 5 miles of the scoping area and all of the main roads within it are used by Royal Mail vehicles on a daily basis.

Particularly with potential for cumulative impacts together with NGET's Eastern Green Link 3 and 4, the construction of this infrastructure proposal has been identified as having potential to impact on Royal Mail operational interests. However, at this time Royal Mail is not able to provide a consultation response due to insufficient information being available to adequately assess the level of risk to its operation and the available mitigations for any risk. Consequently, at this point Royal Mail wishes to reserve its position to submit a consultation response/s at a later stage in the consenting process and to give evidence at any future Public Examination, if required.

In the meantime, any further consultation information on this infrastructure proposal and any questions of Royal Mail should be sent to:

Holly Trotman ([REDACTED]@royalmail.com), Senior Planning Lawyer, Royal Mail Group Limited

Daniel Parry Jones ([REDACTED]@realestate.bnpparibas), Director, BNP Paribas Real Estate

Please can you confirm receipt of this holding statement by Royal Mail.

End

From: [Andrew Waskett-Burt](#)
To: [Grimsby to Walpole](#)
Subject: Rutland County Council ES scoping response
Date: 28 August 2024 14:12:47

You don't often get email from [REDACTED]@rutland.gov.uk. [Learn why this is important](#)

Good afternoon,

Our Ref: 2024/0867/MISC
Site - Grimsby To Walpole Project
Proposal - Infrastructure Planning (Environmental Impact Assessment)
Regulation 2017 (the EIA regulations) - Regulation 10 & 11 and scoping process
for National Grid Electricity Transmission plc for an Order Granting Development
Consent for the proposed Grimsby to Walpole Project.

Thank you for consulting Rutland County Council on the above development. I note that that the applicant has set out its proposed scope of the ES in its Scoping Report, and from a review of these documents I can confirm that the Local Planning Authority do not have any specific comments to make at this time.

Kind regards,

Andrew Waskett-Burt | Principal Planning Officer

Rutland County Council

Catmose, Oakham, Rutland LE15 6HP

T: [REDACTED] | e: [REDACTED]@rutland.gov.uk

Details regarding your data protection rights and how the Council processes your data can be found at: www.rutland.gov.uk/my-council/data-protection

If my email finds you outside of your normal working hours, please feel free to read, act on or respond at a time that works for you.

Rutland County Council
Customer Service Centre: 01572 722 577

Visitor Parking Information & Map: <https://www.rutland.gov.uk/my-community/parking/council-car-parks/>
Email Enquiries: enquiries@rutland.gov.uk
Council Website: <http://www.rutland.gov.uk>
Visiting Rutland? <http://www.discover-rutland.co.uk>

The views expressed in this email are those of the author and may not be official policy. Internet email should not be treated as a secure form of communication. Please notify the sender if received in error.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

date: 30 August 2024
your reference: EN0210003
our reference: PE-00334-24
ask for: Sam Dewar
email: [REDACTED]@dpaplanning.co.uk
DDI: [REDACTED]



Council Offices
Priory Road
Spalding
Lincolnshire PE11 2XE

tel: 01775 761161
fax: 01775 711253
www.sholland.gov.uk

The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Sent by email to: grimsbytowalpole@planninginspectorate.gov.uk.

Statutory Scoping Consultation to South Holland District Council under Section 42 of the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (10 and 11) prior to the submission of an application for an application for an Order granting Development Consent for the proposed Grimsby to Walpole Project

Thank you for your recent consultation in relation to the above. Sam Dewar of Dewar Planning Associates has been instructed to act as lead officer on behalf of the three Local Planning Authorities consulted (Boston Borough Council, South Holland District Council and East Lindsey District Council).

An individual response will be provided on behalf of each Local Planning Authority (LPA) detailing how the development within their authority boundary impacts them.

Introduction

By way of an introduction, I am a chartered member of the RTPI and act as Director and founder of Dewar Planning. I have previously worked as planning officer through to head of planning at local planning authorities and have since formed my own private planning practice submitting applications to over 100 local planning authorities across the UK. These applications have ranged from large wind farms to residential schemes, and various small to major scale commercial developments. We also continue to provide bespoke consultancy assistance for local planning authorities due to the positive relationships we have developed.

The applicant 'National Grid Electricity Transmission plc' intends to submit an application for Development Consent Order under Section 37 of the Planning Act 2008, comprising details of the proposed Grimsby to Walpole Project with an Environmental Statement in line with Regulation 14 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 as well as the other relevant policies and legislations.

South Holland District Council (the LPA) are a statutory consultee as part of duty to consult (section 42 of the Planning Act 2008). For an inclusive and robust response, an internal consultation process has also been undertaken seeking internal responses from certain officers, parish councils and Councillors. All consultees have the ability to respond direct to the Applicant as part of this process however we have presented any responses received to date. Responses received after the submission deadline of 2nd September 2024 will be collated and sent on to the Applicant directly where it is hoped that will still be taken into account ahead of any formal submission.

List of Consultees

Each LPA are a consultee as part of duty to consult (section 42 of the Planning Act 2008). Responses were sought internally from department officers and Councillors and externally to Parish Councils and Town Councils. In some cases, consultations were received outside of these bodies and are included for completeness. All consultees have the ability to respond directly to the applicant as part of this process however we have presented any responses received. The list below is the list of consultations sought by the council. Later in this report if any other representations were received, they will also be included however will be shown as being external to demonstrate that these are not necessarily the views of the Council:

1. Environmental Protection
2. Planning Policy (Joint with Boston Borough)
3. Conservation Assistant (Tree Preservation)
4. SHDC Conservation Officer
5. Senior Ecologist
6. Councillor Thomas Sneath
7. Councillor Anthony Casson
8. Councillor Andrew Woolf
9. Councillor Bryan Alcock
10. Councillor Jim Astill
11. Councillor Angie Harrison
12. Councillor Henry Bingham
13. Councillor Margaret Geaney
14. Councillor Jane King
15. Councillor Paul Barnes
16. Councillor Jo Reynolds
17. Councillor Laura Eldridge
18. Councillor Nick Worth
19. Councillor Allan Beal
20. Councillor Paul Redgate
21. Councillor Sophie Hutchinson
22. Councillor Tracey Carter
23. Councillor Nanette Chapman

24. Councillor Andrew Tennant
25. Councillor Jack Tyrrell
26. Councillor David Wilkinson
27. Councillor Sally-Ann Slade
28. Councillor James Avery
29. Councillor Elizabeth Sneath
30. Councillor Gary Taylor
31. Councillor Suresh Chauhan
32. Councillor Ingrid Sheard
33. Councillor Manzur Hasan
34. Councillor James Le Sage
35. Councillor Mark Le Sage
36. Councillor David Ashby
37. Councillor Robert Gibson
38. Councillor Glynis Scalese
39. Councillor Jan Whitbourn
40. Councillor Aaron Spencer
41. Councillor Christopher Brewis
42. Councillor Michael Booth
43. Crowland Parish Council
44. Deeping St Nicholas Parish Council
45. Cowbit Parish Council
46. Moulton Parish Council
47. Weston Parish Council
48. Donington Parish Council
49. Fleet Parish Council
50. Gedney Parish Council
51. Gedney Hill Parish Council
52. Gosberton Parish Council
53. Holbeach Parish Council
54. Little Sutton Parish Council
55. Long Sutton Parish Council
56. Lutton Parish Council
57. Moulton Parish Council
58. Pinchbeck Parish Council
59. Quadring Parish Council
60. Surfleet & Whaplode Parish Councils
61. Sutton Bridge Parish Council
62. Sutton St Edmund Parish Council
63. Sutton St James Parish Council
64. Tydd St Mary Parish Council
65. Weston Parish Council

Proposed development within South Holland District Council

Within South Holland District Council, sections 4,5,6 and 7 of the Scoping Boundary are relevant as detailed below in Figure 1.1. Whilst Section 7 falls outside of the Councils boundary, the proposed substation works nevertheless are substantial with vantage points from within South Holland’s boundary. It remains to be detailed what the exact works within the below sections will involve, however at this stage it has been assumed that the predominant works are to build substations in sections 5 and 7, with cable routing via new overhead power lines, suspended between pylons.

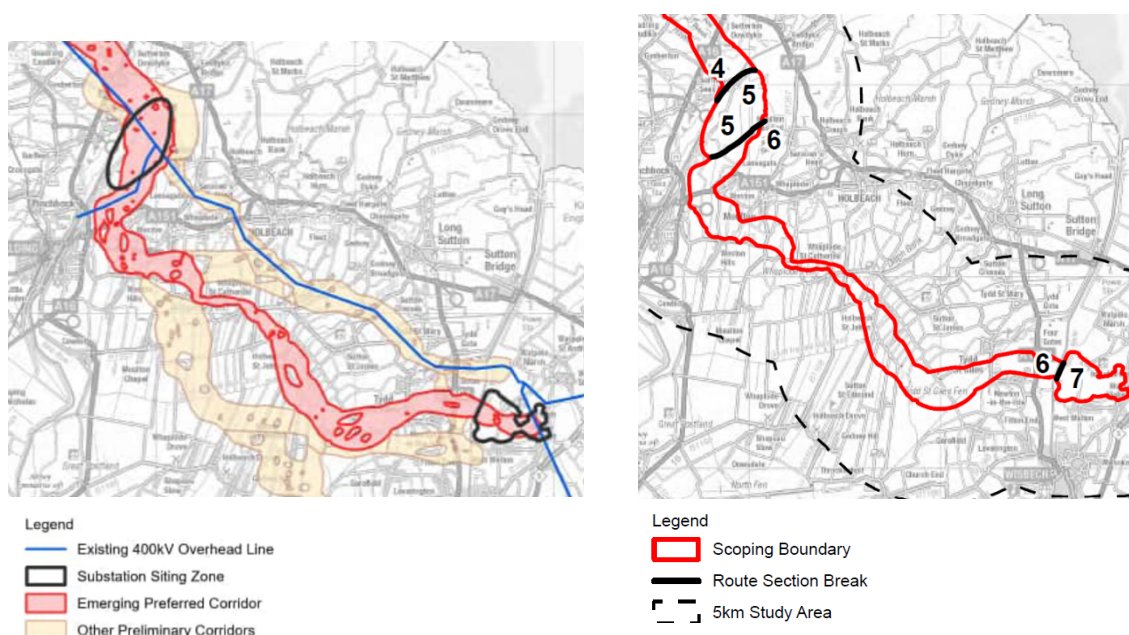


Figure 1.1 : Extracts from Figure 3.9 (left) and Figure 6.1 (right) showing the overall scoping area within South Holland from EN020036-000017-GWPL - Scoping Report Volume 3 Figures Part A - Figures 1.1 to 8.4.

Planning Policy

Whilst the applicant will seek permission for the proposals directly from the Secretary of State for a DCO under section 37 of the Planning Act 2008, there are still a number of local and national planning policies which are considered relevant and should be taken account of as part of the development process. These plans and local knowledge have been formed over several years and have come from a significant evidence base.

The South East Lincolnshire Local Plan 2011-2036 (SELLP) was adopted jointly by South Holland and Boston Borough Council on the 8 March 2019.

The relevant policies within the South East Lincolnshire Local Plan 2011-2036 are:

- Policy 2 'Development Management' – requires proposals to demonstrate sustainable development considerations have been met through a number of criteria.
- Policy 3 'Design of New Development' – requires development to create distinctive places through the use of high quality and inclusive design, demonstrating compliance with a number of considerations.
- Policy 4 'Approach to Flood Risk' – developments must satisfy the sequential test and be supported by a site-specific flood risk assessment covering risk from all sources of flooding including the impacts of climate change. It must be demonstrated that surface water from the development can be managed and will not increase the risk of flooding to third parties.
- Policy 28 'The Natural Environment' – Requires the protection, enhancement and management of natural assets, by ensuring all development proposals provide an overall net gain in biodiversity.
- Policy 29 'The Historic Environment' - Distinctive elements of the South East Lincolnshire historic environment will be conserved and, where appropriate, enhanced.
- Policy 30 'Pollution' Development proposals will not be permitted where, taking account of any proposed mitigation measures they would lead to unacceptable adverse impacts upon:
 - health and safety of the public;
 - the amenities of the area; or
 - the natural, historic and built environment;
 - by way of:
 - air quality, including fumes and odour;
 - noise including vibration;
 - light levels;
 - land quality and condition; or
 - surface and groundwater quality.
 - Planning applications, except for development within the curtilage of a dwellinghouse as specified within Schedule 2, Part 1 of The Town and Country Planning (General Permitted Development) (England) Order 2015, or successor statutory instrument, must include an assessment of:
 - impact on the proposed development from poor air quality from identified sources;
 - impact on air quality from the proposed development; and
 - impact on amenity from existing uses.
- Policy 31 'Climate Change and Renewable and Low Carbon Energy' - All development proposals will be required to demonstrate that the consequences of current climate change has been addressed, minimised and mitigated.

- Policy 32 'Community, Health and Wellbeing' - Development shall contribute to the creation of socially-cohesive and inclusive communities; reducing health inequalities; and improving the community's health and well-being.
- Policy 33 'Delivering a More Sustainable Transport Network' – reinforces the national approach to promoting sustainable alternatives to the car through new development, making the best use of, and seek improvements to, existing transport infrastructure and services. Solutions that are based on better promotion and management of the existing network and the provision of sustainable forms of travel are supported. To achieve this, a Transport Assessment and associated Travel Plan will be submitted with proposals.

The NPPF does not contain specific policies for NSIPs (for which particular considerations apply, determined in accordance with the decision-making framework set out in the Planning Act 2008 and relevant NPSs) but may be considered as a relevant consideration as below.

- Paragraph 123 - Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land⁴⁷.

Footnote 49 of the NPPF states:

Except where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity.

- Paragraph 124 - Planning policies and decisions should:
 - encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;
 - recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;
 - give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
 - promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops,

and building on or above service yards, car parks, lock-ups and railway infrastructure); and

- support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.
- Paragraph 157 - The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- Paragraph 165 - Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- Paragraph 180 - Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
 - preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve

local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and;

- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Representations Received

South Holland District Council does not have in house specialists or advisers for all topic areas relevant to this response, therefore the below list of representations sets out the comments and advice received from internal consultees as well as external consultants employed by the Council. Where no comments have been received and no external consultant employed, this response will seek to comment generally on the topic areas where appropriate, however it is acknowledged that comments may be sent directly by the County Council and these will be endorsed by the Council.

As the Council do not have a Landscape Officer, an external company was sought to respond on behalf of the Council. Terra Loci are Landscape Architects and specialise in Landscape Planning.

The comments received from consultees are summarised as follows, and as stated they are divided into internal and external. If any external responses are received that officers believe are relevant to certain chapters of the scoping report then these will be elaborated upon within the review section of the response:

Internal

Landscape (summarised and expanded upon later in this response)

- Representative viewpoints must be submitted and approved prior to the assessment being undertaken
- ZTV analysis should also include a bare-earth scenario to show the potential worst-case
- It is unclear from the Landscape / Visual methodologies how results of ZTV analysis will be presented
- ZTV analysis should also be undertaken for the maximum foreseeable parameters of development within substation compounds
- Locations for representative viewpoints should be submitted for approval along with the type of visualisation proposed and appropriate justification for the visualisation type
- The LVIA should consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics. The

EIA process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit

- Cumulative schemes to be included within cumulative assessment should be submitted prior to undertaking assessment.

Planning Policy

Given your deadlines the only helpful, and obvious comment, is to ask why the two schemes cannot share infrastructure.

I realise one is DC and the other AC and that the Grimsby to Walpole 'New Walpole Substation Location Options report' shows underground DC is very much more expensive than the overhead AC line option. However, in general terms from the point that the EG3 & 4 schemes come on shore they have a similar route to Weston and then the Walpole. I also know that another offshore scheme is likely to come to Lincolnshire from the north. I appreciate these various projects may not be on the same time frame, nonetheless from an environmental and amenity angle NGED need to explain in clear terms why the schemes cannot be more joined up and allow more undergrounding of the overhead line.

Cllr Harrison

Overhead powerlines have been historically linked to cancer in young children; specifically, brain tumours and leukaemia.

The power lines create a humming sound which is audible from 3 miles away, and hiss when it rains, (which can be often in these parts).

The visual impact will be significant as the landscape is flat and there will be nothing to soften or hide these huge structures.

This region is renowned for tourism and farming/food production, so industrialisation of the area in such a significant way will have a huge impact on both industries.

External

Holbeach Parish Council

Thank you for seeking our advice on the scope of the Environmental Statement (ES), and present the opinions of our overview of energy delivery infrastructure affecting our locality in conjunction with the scoping of this project.

Firstly, may we comment that although National Grid was keen to stress that Grimsby to Walpole project which would see 140km of overhead power lines running from Lincolnshire

to Norfolk are separate from the EGL 3 & 4 projects . However, both are part of the Great Grid Upgrade. However, we believe they have failed in their goal and parishioners have easily been confused with each project, and then the Outer Dowsing project along with GEI, Meridian and numerous other energy leads to misunderstanding. We feel more clarity is required as it seems like a question of “smoke and mirrors” tactics are being used, even if not intentional.

The way we generate electricity in the UK is changing rapidly, and we are transitioning to cheaper, cleaner, and more secure forms of energy such as proposed solar arrays and more offshore windfarms. The Parish Council understand and support that, but not at any cost. We are striving to move forward, and appreciate we need to move forward, away from archaic infrastructure systems. We are somewhat at a loss as to why the alternative routing of a sea cabling network is not being seriously reviewed and believe that should be a part of the scoping evaluation.

We see “Interconnectors” cables on the Viking link and proposed link from Morrocco to Southern England and find it difficult to appreciate bringing this proposed new infrastructure onshore into our region and feel we deserve justification. We see cables replacing Pylons in some parts of the UK but find two systems sharing similar swathes underground and above ground, cost should NOT be a considered a factor because we are rural, lower density population and the cheapest option when building substations on low cost land and the effect on the local environment. Fullest evaluation needs to be PROVEN to the community.

We appreciate various technologies require different suitable options, which would include deciding whether an overhead line or an underground cable is right for a particular project and suitability of AC / DC currents. Much of this appears to be down to infrastructure costs and financial viability with little concern for the alternatives for moving power to the required areas, mostly coming from offshore and Scotland they are offshore but bringing onshore rather than down to perhaps more suitable points such as Tilbury.

Our concerns are if these projects are to ensure the supply movements due to anticipated increases by approximately 50% by 2036 then what will be the transportation requirements for 2050 when that will more than double? (source National Grid) Are these plans therefore to accommodate for the next 10 years or 25 years or beyond and will we be looking at a replay of this expansion in a few years' time ? We are concerned and would seek information during the scoping and consultation periods for future expansion plans and the effects this would add.

During this specific ES scoping request we specifically draw your attention to our concerns relative to Development Consent for the Proposed Grimsby to Walpole Project (Transmission by OVERHEAD Cables - PYLONS)

Potential impacts on the landscape:

We envisage concerns during the construction process whereby the workings will influence the landscape and when completed a visual impact of pylons and substations due to the predominately flat area of Lincolnshire. We have concerns also about the size of these pylons in height, far exceeding any currently in our area.

Potential impacts on natural environments:

We anticipate that the various natural life consultees will have an opinion but would like their scope to be from field visits rather than just desk based. We have an increasing and developing wildlife in the area, not just the known bird populations around The Wash area but on shore such as Marsh Harriers, Buzzards, Hawks owls as well as other animals including deer, hares stoats and weasels with a concern for the declining hedgehog population that may be disturbed. (No we didn't forget bats and newts as we know they will be included.)

We would like concerns given to the flight paths of migrating birds.

What will be the short term and long-term effects be during construction and maturity? Ancient and modern hedgerows, and some woodland areas will be damaged and we would like to understand how this will be addressed.

Potential impacts on residents:

We believe as the routes travels through our Parish that there will be disruption to daily activities during construction period, (light pollution, dust, road closures) along with potential health impacts of living in proximity.

We have noted concerns with the effects of the EMF from overhead cables suspended from Pylons and seek to have this investigated as part of the scoping process.

We would also like to understand if these transmission cables produce pulsed electric fields (PEF) and or ELF in conjunction to the EMF, what are the potential damage to human and animal health in the short and longer term?

We understand micro shocks are a concern from overhead cables, however we know little about the effect from the underground cables?.

There are concerns for the devaluation of property, including residential, farming and commercial and appreciate these being evaluated and what conclusions would be made

Will there be a heightened risk of flooding after groundworks?

Potential impacts on businesses:

Being a predominately food production farming based region with some tourism, we request review of the loss of prime agricultural land for siting of the pylons, disruption to holiday makers during construction and reduced appeal of the region once constructed. Most certainly visual the appeal will be limited and the countryside damaged. Could a possible consultee research tourist opinions as to their visit decision with these new features and if they would be deterred by them?

What steps will be taken to ensure that harvests can continue during construction?

Road closures will potentially influence the community and important logistics throughout the region, and we know our parishioners will have concerns on the traffic flows?

Potential impacts on existing infrastructure:

During construction there will be many large heavy vehicles on narrow country lanes, what steps will be taken to mitigate the disruption to rural transport links, damage to the already crumbling county roads. Potential for narrow lanes to subside under the weight of heavy plant possibly contaminating watercourses and causing flood risk. Who will guarantee and make payment for repairs and reinstatement as maybe required? (If Lincolnshire Highways, then additional support may be required and we would be concerned if this was not the case, and the local taxpayer burden is increased.) We would request a full survey of the road both actual visual and video recorded undertaken and minimum levels after construction as part of the ES process

Potential safety risks:

What measures will be in place during construction and beyond to mitigate the risks to workforce and residents, given that many areas are rural and emergency response times are slow?

Importantly we have many light aircraft, gliders, microlite as well as commercial and military operations within the area . Pylons are a natural concern at these heights, and we request in depth consultations to extend to all parties' recognitions.

We understand other energy production and storage may be added, such as solar arrays and BESS , some of which are already in the planning stages for approval . As these all interlinked with the National Grid Upgrade plans, we must ensure a total overview of the issues that can happen and wish to ensure the public understand these risks, however miniscule, and with these and the other issues raised, we would like everything to be considered and evaluated to avoid an Environmental catastrophe and protection and duty of care for people in our Parish.

Community Benefit Funding.(CBF)

With all the disturbances and potential issues, we are requesting to be included in the ES we would be interested to know what the community can expect during short term construction which will last for years and for long term as some form of recompense? There should be some allocation and how and where it is allocated should be considered. The community is part of the environment and therefore the request of positive benefit should be evaluated in the scoping and planning stages , even if it is not usually made, as it appears to be getting energy where it is most needed at the cost to the environmental standards of our Parishioners.

Regretfully when following the inspectorate link to the developer's website, then clicking on planning access is denied. This does not help the consultee to perform their due diligence duties screenshots attached.

Grimsby to Walpole

Project information

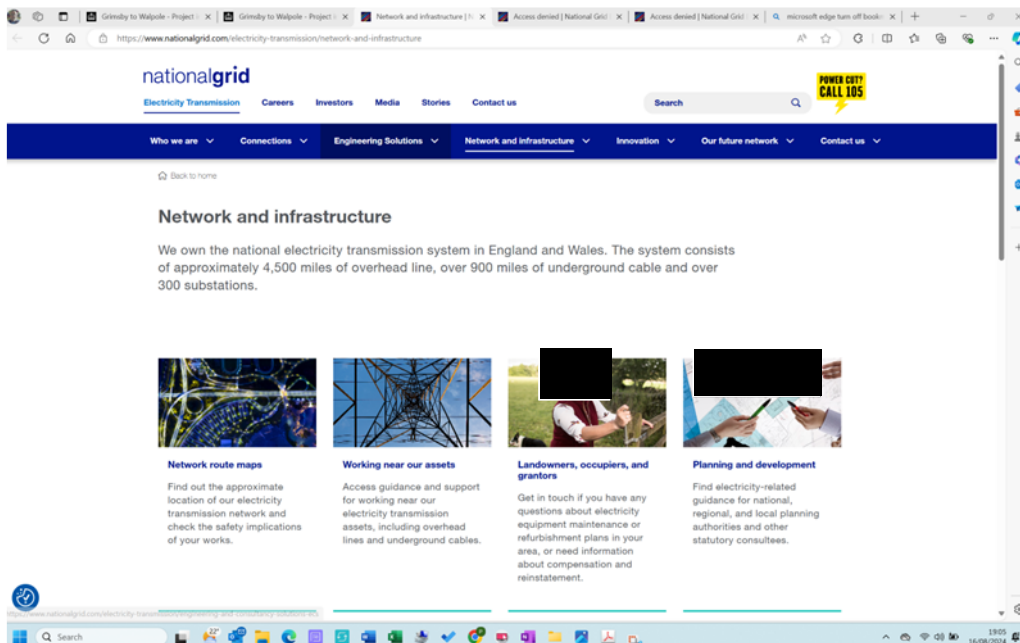
About the project

Type of application: Electric Lines

Name of applicant: National Grid Electricity Transmission

The project will be a new c140km long 400kv overhead line and 5 new substations stretching from a new substation to the west of Grimsby in the north to a new substation at Walpole near Wisbech in the south. Three further substations will be built, two to the south west of Mablethorpe and one to the north east of Spalding

[View the developer's website](#)



Access denied

You are not authorised to access this page.

[Go to previous page](#)

[Back to home](#)

Fleet Parish Council

On behalf of Fleet Parish Council we wish to express our strong opposition to the Grimsby to Walpole Project. After thoroughly reviewing the scoping report, we have significant concerns regarding the potential impacts of this project on our parish and its residents. Below, we outline our specific objections and requests for further consideration.

1. Cumulative Impact Assessment

Fleet Parish Council opposes the project due to the inadequate consideration of cumulative impacts. The current scoping report fails to provide a sufficiently detailed cumulative impact assessment. Given the number of ongoing and proposed infrastructure projects in the region, including nearby wind farms and other energy developments, it is essential to consider the combined effects of these projects on our local environment, landscape, and community wellbeing.

We strongly urge the Planning Inspectorate to require a comprehensive cumulative impact assessment that includes the combined environmental pressures such as increased traffic on local roads, noise pollution, and visual intrusion. The absence of such an assessment is a significant oversight and one of the primary reasons for our opposition.

2. Long-Term Health Effects

The potential long-term health effects of this project are of great concern to our community. The scoping report's current focus on short-term construction impacts is insufficient. We insist on a thorough health impact assessment (HIA) that addresses long-term risks, including prolonged exposure to electromagnetic fields (EMF), deteriorating air quality due to increased traffic, and sustained noise pollution. Our parish includes vulnerable populations, such as the elderly and children, who could be disproportionately affected by these risks. The lack of attention to these long-term effects further solidifies our opposition to the project.

3. Biodiversity

Fleet Parish is characterised by its rich biodiversity, including species and habitats that are integral to the local ecosystem. The current scoping report does not adequately assess the potential impacts on these natural assets.

We oppose the project unless the EIA includes a comprehensive biodiversity assessment that covers all potentially affected species, particularly those unique to our area, such as rare bird species and native wildflowers. The potential disruption to these habitats is unacceptable and poses a significant threat to our local environment.

4. Visual and Landscape Impacts

The rural landscape of Fleet Parish is a vital aspect of our community's identity and quality of life. The introduction of new overhead lines and substations will have a detrimental impact on this landscape, affecting both residents and visitors.

We strongly oppose the project on the grounds that the visual impact will be significant and detrimental. We urge the Planning Inspectorate to require the use of underground cabling and extensive screening measures, including native tree species, to minimise these impacts. The potential damage to the rural character of Fleet Parish is unacceptable.

5. Community Consultation

We are deeply concerned about the adequacy of the community consultation process. The residents of Fleet Parish deserve a voice in decisions that will so profoundly affect their lives. We oppose the project unless there is a commitment to a robust and transparent community consultation process, including public meetings and opportunities for meaningful input from local residents. The current level of engagement is insufficient, and we demand that the voices of our community be heard and respected.

6. Socio-Economic Impacts

Fleet Parish's economy relies heavily on small businesses, agriculture, and tourism. The socio-economic impacts of the project, particularly during the construction phase, could be devastating.

We oppose the project due to the lack of a detailed assessment of its potential socio-economic impacts. The EIA must address the potential disruptions to local businesses, particularly those along local roads where traffic disruptions are likely. Additionally, the impact on tourism and heritage sites could lead to long-term economic decline, which is unacceptable to our community.

Conclusion

Fleet Parish Council is firmly opposed to the Grimsby to Walpole Project. The potential environmental, health, and socio-economic impacts of this project are unacceptable to our community. We urge the Planning Inspectorate to consider these objections seriously and to require comprehensive assessments and mitigations that reflect the full scope of the project's impact on Fleet Parish.

We appreciate the opportunity to provide input, but our position is clear: this project, as currently proposed, is not in the best interest of our community.

Review of the Scoping Report

At this stage the following comments are offered in connection with the topic areas as listed. As stated in the aforementioned section, where no opinion has been received from in-house advisors at the Council nor has there been an external consultant employed to provide comment then general observations have been put forward. Some chapters proposed in the scoping report are best covered by the County Council or other statutory stakeholders and so in this case as officers at the LPA we have remained silent.

Landscape and Visual

The potential visual receptors have been outlined, however representative viewpoints must be submitted and approved prior to the assessment being undertaken. Supporting Zone of Theoretical Visibility analysis, as defined within the scoping report and as noted below should also be provided to ensure that the proposed study area is sufficient.

ZTV methodology in Paragraph 6A.4.45 and 7A.4.51 notes features to be included within ZTV calculation. ZTV analysis should also include a bare-earth scenario to show the potential worst-case.

It is unclear from the Landscape / Visual methodologies how results of ZTV analysis will be presented. It would be most useful to aid in the understanding of visibility of the pylon route if, alongside blanket visibility additional ZTV plans indicate the number of pylons likely to be visible through the use of overlapping ZTVs.

ZTV analysis is proposed for pylon routes, ZTV analysis should also be undertaken for the maximum foreseeable parameters of development within substation compounds. The parameters used to inform these ZTVs should be included alongside them.

The Landscape and Visual methodologies including assumptions and limitations outlined within them are appropriate.

Visual representations are proposed to be in line with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019) noting a combination of type 2, 3 and 4 visualisations are proposed. Locations for representative viewpoints should be submitted for approval along with the type of visualisation proposed and appropriate justification for the visualisation type.

The proposed approach to assess impacts on both national, and local level landscape character areas is appropriate to allow for assessment of impacts at relevant scales.

NCA Profile 41: Humber Estuary can be scoped out of the assessment as stated in paragraph 6.5.43.

LCT 1: Industrial Landscape (Humber Estuary LCA) can be scoped out of the assessment as stated in paragraph 6.5.52.

RCLT 1B: Coastal Dunes, Beach and Intertidal Sand Flats, RLCT 1C: Shallow Coastal Waters, RLCT 1A: Coastal Saltmarshes and Mudflats, RLCT 1E: Offshore Industries, Fisheries and Navigations can be scoped out of the assessment as stated in paragraph 6.5.56.

RLCT 4B: Wooded Vales can be scoped out of the assessment as stated in paragraph 6.5.57.
LCA E4: Marshland St. James can be scoped out of the assessment as stated in paragraph 6.5.61.

Table 6.2: Impacts, receptors and potential for significant effects and Table 6.3: Proposed scope of the assessment outline elements to be scoped in and out of the assessment in line with reasoning highlighted above, no changes proposed to elements scoped in or out here.

Table 7.2: Impacts, receptors and potential for significant effects notes the elements to be scoped in and out of the visual assessment, no changes proposed to elements scoped in or out here.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, the LVIA should consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics. The EIA process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

Cumulative schemes to be included within cumulative assessment should be submitted prior to undertaking assessment.

As officers we are concerned about the extent of overhead cables and this is echoed in some of the internal and external responses received.

Ecology and Biodiversity

At this early stage in the development of the Scheme, only limited desk-based information has been presented within the Scoping Report.

The Scoping Report details that on respect of biodiversity, key consultees have been identified for engagement throughout the ore-application stages of the process.

The biodiversity assessment will consider the potentially significant effects on biodiversity receptors that may arise from the construction and operation of the Scheme.

The Councils ecologist has not responded and the Wildlife Trust may have chosen to comment directly on the consultation, however having reviewed the information put forward within the Scoping Report, the approach taken appears reasonable in the methodology and we have no specific comments to offer other than the importance of achieving a 10% biodiversity net gain for this proposed nationally significant development, in line with The Environment Act 2021.

Cultural Heritage

No comments have been received from the Council's Archaeological and Cultural Heritage consultant, however having reviewed the information put forward within the Scoping Report, the approach taken appears reasonable in the methodology and we have the below comments to offer:

- The Council would expect a detailed landscape and visual assessment for any above ground features and for each to be looked at separately pending the final location and scale.
- We would expect a scheme of trail trenching to be included as part of the main planning submission.

Geology and Hydrogeology

South Holland Council do not have an in-house geologist and the Coal Authority may have chosen to comment directly on the content of the consultation, however having reviewed the information put forward within the Scoping Report, the approach taken appears reasonable in the methodology and we have the below specific comments to offer:

- Soil management practices may need further evidence

Lincolnshire County Council act as Lead Local Flood Authority and may comment directly to the proposed development. having reviewed the information put forward within the Scoping Report, the approach taken appears reasonable in the methodology and we have no specific comments to offer.

Agriculture and Soils

The council do not have a specific officer to deal with such matters however this topic area is of fundamental concern to the Council simply due to the amount of land that is associated with the development. The NPPF is clear that planning policies and decisions should

contribute to and enhance the natural and local environment by (amongst other criteria) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); and recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland. Natural England provide extensive guidance on the matter and the Applicant is urged to follow this in their preparation of their work as it is acknowledged that this is effectively a desire to challenge the current agricultural classification of the site (please see <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>).

These comments are echoed by internal consultees including elected councillors who have significant concern over the impact of the development on Grade 1 agricultural land.

Planning policy officers have also commented stating that whilst we understand the Grimsby to Walpole 'New Walpole Substation Location Options report' shows underground DC is very much more expensive than the overhead AC line option however, in general terms from the point that the EG3 & 4 schemes come on shore they have a similar route to Weston and then the Walpole. We would encourage the Applicant to explain in clear terms why the schemes cannot be more joined up and allow more undergrounding of the overhead line. This is echoed in detailed comments from Holbeach Parish Council and we would invite the Applicant to review these comments as officers feel they are well informed and justified.

Traffic and Transport

Lincolnshire County Council act as highways authority and will comment directly on the proposed development. Having reviewed the information put forward within the Scoping Report, the approach taken appears reasonable in the methodology and we have no specific comments to offer other than the following points:

1. The suitability of the rural roads, many of which are in poor condition (e.g. subsidence), to cope with the loading by heavy construction vehicles. What mechanism is in place for any urgent reinstatement. Is a survey of the roads (and any strengthening needed) to be carried out at the commencement of works?
2. What restrictions will be placed on working hours/days?
3. What is the procedure in place to deal with complaints from residents regarding access, noise, dust etc.?
4. Construction compounds and field accesses in the countryside can have a significant affect and we would therefore welcome a full scheme of remediation and reinstatement after the cable/works have been undertaken.

Noise and Vibration

No comments have been received by the Council's Environmental Health Officer has reviewed the information put forward and the following comments are provided:

1. Please provide the LPA with appropriate contact details in event of complaints during construction
2. Ensure the LPA and all relevant Noise sensitive receptors (NSR) in the immediate area are informed of any proposed works outside of normal working hours
3. Maintain sound barriers in good order
4. Vibration, ensure the LPA and all Vibration Sensitive Receptors in immediate area are informed of operations such as piling where vibration is likely to exceed 0.3mms and ensure appropriate monitoring equipment is used in vicinity of works

Air Quality

The Council's Environmental Health Officer has not yet responded, however the following comments are provided in relevance to the development at this stage:

1. Burning of waste should be avoided. Any burning of waste deemed strictly necessary should be undertaken in accordance with the relevant waste management exemption issued the Environment Agency, and consideration should be given to the timing of such burning, and the prevailing weather conditions to impact emissions to air and nuisance to offsite receptor's
2. Soil stockpiles should be sealed to recued fugitive dust emissions

Concluding Remarks

Whilst we appreciate many stakeholders will comment directly to the Applicant on the project, we wanted to provide a response based on the submitted Scoping Report with assessment of the proposed onshore cable route and associated switching and convertor stations and substations.

We note your community engagement to date however we would welcome future discussions over any proposed community benefits as well as any proposed employment and skills schemes that could be provided to the local workforce as well as any other potential grid infrastructure improvements that may be facilitated by the development.

This advice is based upon the information available at this time. Please note that the advice is given without prejudice to any future comments made by the LPA upon the receipt of further information, whether during or before the submission of a full EIA planning application.

We kindly ask that the comments received from stakeholders listed are taken into consideration as you can see there is, in part, strong feelings about the proposal.

If you have any queries, please do not hesitate to contact me on the details provided and I would appreciate it if all future correspondence could be made directly to myself as I have been instructed by the LPA to act on their behalf until the end of the application process. This will avoid any delays in our response as we have struggled to allow internal consultees sufficient time to get back to us.

Yours sincerely,

Sam Dewar
Consultant Planning Officer
[REDACTED]@dpaplanning.co.uk

South Kesteven District Council

Development Management
Council Offices, The Picture House,
St Catherine's Road, Grantham, NG31 6TT
Tel: 01476 406080
E-mail: planning@southkesteven.gov.uk
Web: www.southkesteven.gov.uk



SOUTH
KESTEVEN
DISTRICT
COUNCIL

Hannah Terry The Planning Inspectorate	Case Officer	Kevin Cartwright
	E-Mail	██████████@southkesteven.gov.uk
	Tel Ext:	
	Date:	29th August 2024

Dear Sir/Madam

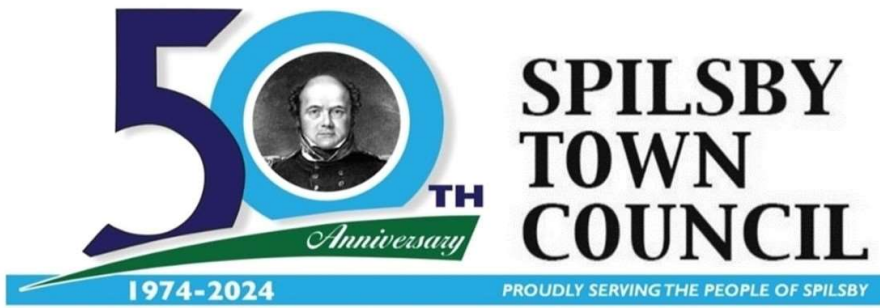
Application No.	S24/1439
Proposal:	Proposed Grimsby to Walpole project.
Location:	Grimsby To Walpole
Application Type:	Adjoining Authority Consultation
Decision:	Comments to Make:

The above proposal has been considered by this Authority and on the 29th August 2024 it was resolved that this Council wishes to make the following comments:-

1. South Kesteven District Council is satisfied with the scope of topics set out in the Environmental Impact Assessment Scoping Report ref: EN020036.

Yours faithfully

Emma Whittaker
Assistant Director Of Planning



Spilsby Town Council
Town Clerk's Office
Franklin Hall
Halton Road
Spilsby
Lincolnshire
PE23 5LA

27th August 2024

FAO The Planning Inspectorate
RE: the proposed Grimsby to Walpole Project.

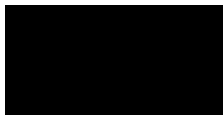
Dear Sirs,

Many thanks for your email dated Tuesday 6th August 2024 regarding a consultation to inform the scoping opinion on the proposed Grimsby to Walpole Project.

Sadly, no new information has been received to alter the opinion of Spilsby Town Council that this project will detrimental to Lincolnshire, our environment, our economy, our tourism and our residents.

As there are alternative options available to the National Grid, better alternatives, this project does not have the support of Spilsby Town Council, who are unequivocally opposed to it. It is unfathomable that anyone in good conscience can support this project.

On behalf of Spilsby Town Council,
Yours sincerely,



Jack Sargent
Town Clerk
Spilsby Town Council

From: clerk@theddlethorpeparishcouncil.gov.uk
To: [Grimsby to Walpole](#)
Cc: ["Stef Bristow"](#)
Subject: RE: EN020036 - Grimsby to Walpole Project - EIA Scoping and Consultation & Regulation 11 Notification
Date: 20 August 2024 12:12:48
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

You don't often get email from clerk@theddlethorpeparishcouncil.gov.uk. [Learn why this is important](#)

Dear Hannah,

I am writing to you on behalf of Theddlethorpe Parish Council, a consultee for the captioned proposal. At our meeting of 19th August 2024, the council resolved to ask that the following be included in the EIA:


- Survey of expected impact/effect on wildlife
- Survey of expected impact/effect on the water table
- Survey of expected impact/effect on climate change
- Survey of expected impact/effect on flooding risks
- Survey of expected impact/effect on low altitude aviation (especially as we rely on the air ambulance in this area)
- Expected net carbon footprint of the project
- Electromagnetic compatibility, particularly Radiated emissions (with particular emphasis near primary schools)
- Archaeological study of the planned route
- Economic viability of the project on its own merit; why is this section coming on-shore when the remainder is offshore?

Thank you

Stef

Kind Regards,

Mrs S Bristow
Parish Clerk & RFO


Theddlethorpe (All Saints and St Helens) Parish Council

From: [Liz Quiney](#)
To: [Grimsby to Walpole](#)
Subject: Scoping response from Thornton Le Fen Parish Council.
Date: 26 August 2024 21:52:50

You don't often get email from [REDACTED]@gmail.com. [Learn why this is important](#)

As Chair of the above Council I wish to respond to the Environmental Scoping request.

We feel you have deliberately given a very short response time in the height of the holiday season to get less responses.

Below you will find some of the many reasons that the people of the above Parish are absolutely against this proposal.

Our overarching opinion is that this proposal will destroy our whole way of life.

You are proposing outdated technology for Lincolnshire to prioritise profit.

It will destroy grade 1 growing land that can never be replaced.

The pylon proposal will open the floodgates to have more land destroyed by developments such as massive solar farms.

It will compromise our food security.

It will destroy our already crumbling infrastructure.

The process of construction will destroy further land and will put an unbearable strain on the lives of local residents.

It will destroy our delicate balance of wildlife. Barn owls, bats, newts, deer...

It will destroy our property prices.

The pressure on people's mental health will destroy lives.

You cannot prove that this proposal isn't damaging to health. In fact the existing data suggests clusters of cancers around areas with pylons.

The noise for people living close by will be intolerable, especially in damp weather.

It will destroy our tourism.

It has the potential to increase flooding.

It has the potential to interfere with and contaminate our watercourses.

It will destroy our unique landscape.

It will interfere with the millions of birds that use the migration superhighway.

The Wolds are protected. The view from the Wolds is also just as important... This will be destroyed.

The Fen landscape is as valuable as the Wolds if not more important as it is unique. This will be destroyed.

We absolutely support the integrated off shore solution that is being proposed for the rest of this project.

Please consider all of these issues and understand the damage you are proposing to impose on the people of Lincolnshire.

Liz Quiney.

Chair.

Thornton Le Fen Parish Council.



UK Health
Security
Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Our Ref: 70559CIRIS

Ms Hannah Terry
Senior EIA Advisor
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol BS1 6PN

30th August 2024

Dear Ms Terry,

**Nationally Significant Infrastructure Project
National Grid Electricity Transmission (NGET) Grimsby to Walpole Project EN020036
Scoping Consultation Stage**

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up, to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following specific comments and recommendations:

Environmental Public Health

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). We believe the summation of

relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document '*Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*', setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Electric and Magnetic Fields (EMF)

It is noted that an EMF report will be prepared as part of the Project. UKHSA expects the report to include an assessment of the possible health impacts of electric and magnetic fields associated with the development and further advice is available in the reference document - *Advice on the content of Environmental Statements accompanying an application under the Nationally Significant Infrastructure Planning Regime*¹.

Human Health and Wellbeing

This section of OHID's response, identifies the wider determinants of health and wellbeing we expect the Environmental Statement (ES) to address, to demonstrate whether they are likely to give rise to significant effects. OHID has focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are:

- Access
- Traffic and Transport
- Socioeconomic
- Land Use

Having considered the scoping report, OHID wish to make the following specific comments and recommendations. We note the intention to engage further with OHID and given our comments and level of concern we would welcome the opportunity to discuss specific elements of the scheme alongside local Directors of Public Health.

1

<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>

Vulnerable populations

The scoping report references the Institute of Environmental Management and Assessment (IEMA) guidance for Determining Significance for Human Health in Environmental Impact Assessment. The Chapter lists some local health receptors but does not consider any differential impacts on vulnerable populations in addition to the general population, as required by the IEMA guidance.

Some groups of individuals may be particularly vulnerable to changes in biophysical and socio-economic factors (adversely or beneficially) whereby they could experience differential or disproportionate effects when compared to the general population.

While the average local health circumstance across a defined population may be considered good, there may be groups of individuals within that defined population who are particularly sensitive and could experience disproportionate or differential effects. On this basis the IEMA guidance for Determining Significance for Human Health in Environmental Impact Assessment identifies it may be appropriate to consider relevant sub-populations, i.e., groups of more sensitive individuals.

The equalities impact assessment (EqIA) will also identify vulnerable populations, but there is no mention of the findings from this assessment to support the population and human health assessment.

Recommendation

The population and human health chapter should be revised and report any differential or disproportionate effects on vulnerable populations, when compared to the general population, including cross referencing to the EqIA where appropriate.

Effects on mental health - (Risk perception / understanding of risk)

The scoping report (para 6.11) makes reference to the potential for local public concern through understanding of risk / risk perception of electric and magnetic fields (EMF). The report outlines how information on EMFs will be provided as a separate document alongside the ES and other DCO application documents. The information provided will include details and information on how the Project will comply with relevant guidelines and codes of practice.

The report does not indicate how any community anxiety or concern from EMF will be identified and addressed. It is assumed that the engagement team will communicate safety information within the various public consultation opportunities. It is important that communication programmes in relation to the Project should provide a source of clear and objective information to increase knowledge and awareness.

It is important to understand levels of community anxiety in order to influence the approach to these public consultations and the need to change or improve the information or approach.

At pre-scoping consultations Norfolk County Council commented that it would like to see a full health impact assessment undertaken, setting out appropriate mitigation measures if required. The Council also notes that public concern regarding EMF could give rise to potential anxiety in local populations, and therefore requests that a mental health assessment is carried out.

The scoping report confirms that a mental health assessment is not currently scoped into the health and wellbeing assessment of the Preliminary Environmental Impact (PEI) Report and ES, however further engagement with the Norfolk Country Council will be undertaken to ensure mental health is considered appropriately.

Community anxiety will form an important aspect of public mental health. The broad definition of health proposed by the World Health Organization (WHO), includes reference to mental health. Mental well-being is fundamental to achieving a healthy, resilient, and thriving population. It underpins healthy lifestyles, physical health, educational attainment, employment and productivity, relationships, community safety and cohesion and quality of life.

Recommendation

The ES should consider potential effects on mental health through risk perception / understanding of risk posed by the exposure to EMF.

When estimating community anxiety and stress a qualitative assessment may be most appropriate. Robust and meaningful consultation with the local community will be an important mitigation measure, in addition to informing the assessment and subsequent mitigation measures. This may involve conducting resident surveys but also information received through public consultations, including community engagement exercises. The Mental Well-being Impact Assessment Toolkit (MWIA) contains key principles that should be demonstrated in a project's community engagement and impact assessment. We would also encourage consultation with the local authority's public health team who are likely to have Health Intelligence specialists who will have knowledge about the availability of local data. The assessment should identify vulnerable populations. Guidance is available from the IEMA².

² Pyper, R., Waples, H., Beard, C., Barratt, T., Hardy, K., Turton, P., Netherton, A., McDonald, J., Buroni, A., Bhatt, A., Phelan, E., Scott, I., Fisher, T., Christian, G., Ekerawati, R., Devine, K., McClenaghan, R., Fenech, B., Dunne, A., Hodgson, G., Purdy, J., Cave, B. (2022) IEMA Guide: Determining Significance for Human Health in Environmental Impact Assessment.

The scope and methodological approach should be agreed with the Local Directors of Public Health (DPH) and OHID.

Report format and presentation

We welcome the reporting of assessment details broken down into appropriate sections given the linear nature of the scheme. The scoping report does not explain how the population and human health chapter will be structured. It is assumed the ES will follow the EIA process, e.g. baseline, sensitivity of receptors/communities, determinants of health, then potential impacts and effects, rather than take each scheme section in turn. A format in this way often leads to assessments being difficult to follow. This prevents a clear understanding of the findings of the assessment and in combination effects for each section/community.

Recommendation

The Chapter should be structured such that a reader can consider route wide and then each of the individual scheme sections separately. This avoids the need for repetition and enables the assessment methodology to be followed for each scheme section/wards in turn. This does not require any additional information but just a reformatting of the presented information and assessment for the PEIR.

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

From: [Maria Vincent \(Clerk to Utterby Parish Council\)](#)
To: [Grimsby to Walpole](#)
Subject: EN020036 - Grimsby to Walpole Project – EIA Scoping and Consultation & Regulation 11 Notification
Date: 20 August 2024 13:56:19

You don't often get email from clerk@utterbyparishcouncil.gov.uk. [Learn why this is important](#)

Please see below the comments regarding this consultation.

Utterby Parish Council ask that the following questions are answered on the ES:

What will be the impact on endangered/protected wildlife?
What will be the impact on areas of historical/archaeological significance?
What will be the impact on local agriculture?
Will there be any potential environmental-related population health issues resulting from the proposed pylons being in place?

It is reported that cabling via the seabed is substantially more expensive and yet other links are via seabed, so in the long term is it not more sustainable and better for the environment for seabed cabling to go ahead?

Many thanks,
Maria

Maria Vincent
Clerk to Utterby Parish Council
clerk@utterbyparishcouncil.gov.uk
Tel: 
www.utterbyparishcouncil.gov.uk

Hannah Terry
Planning Inspectorate
grimsbytowalpole@planninginspectorate.gov.uk

BY EMAIL ONLY

Your ref: EN020036
Our ref: 24_28782_P

30th August 2024

Dear Ms Terry,

RE: Application by National Grid Electricity Transmission plc (the Applicant) for an Order granting Development Consent for the Grimsby to Walpole Project – Scoping Consultation

Thank you for consulting Water Management Alliance on the Environmental Impact Assessment (EIA) Scoping consultation for the proposed Grimsby to Walpole project. This response is provided on behalf of two of our members, South Holland Internal Drainage Board (SHIDB), and King's Lynn Internal Drainage Board (KLIDB), because parts of this project (parts of sections 4 and 6, and all of sections 5 and 7 of the project – including the Weston Marsh Substation and the Walpole B Substation) are located within the Internal Drainage District (IDD) of these Boards.

SHIDB and KLIDB have been aware of the proposed Grimsby to Walpole project prior to the current consultation, through direct engagement with the applicant and their agents. We intend to continue this engagement throughout the planning process to discuss matters within the IDB remit, i.e. consideration of land drainage, flood risk and water management infrastructure.

The Boards wish to provide the following comments relating to the scope of the EIA:

1. There is an extensive network of drainage ditches (including main drains and ordinary (riparian) watercourses) and piped land drainage across the South Holland and King's Lynn IDD's. It is noted that the project could require crossings of multiple ditches, drains and watercourses for construction access and the installation of overhead lines. Construction of two new substations, one at Weston Marsh and one at Walpole, also

MEMBER INTERNAL DRAINAGE BOARDS

Broads (2006) IDB, East Suffolk WMB, King's Lynn IDB, Norfolk Rivers IDB, Pevensy and Cuckmere WLMB, South Holland IDB, and Waveney, Lower Yare and Lothingland IDB



has the potential to affect watercourses and land drainage. The Boards therefore strongly agree that the water environment – in particular, but not limited to, “physical disturbance and change to flow regime” – should be scoped into the EIA, because of the relatively high flood risk across the entire area and because of the potential for the projects to impact on the existing drainage network that is critical to protecting people, property, infrastructure and businesses in the area.

2. The Boards welcome the applicant’s commitment to design measures, and measures for the control and management of impacts that could affect the water environment, as outlined in the EIA Scoping Report (section 10.6). Further measures could be required by the Boards as conditions of any consents/approvals granted for works affecting Board watercourses or other assets.

SHIDB and KLIDB would also like to highlight that works affecting watercourses (e.g. watercourse crossings, works within 9m of a watercourse, discharges to a watercourse) within the Internal Drainage Districts would require consent from the Boards under the Land Drainage Act 1991 including the Boards Byelaws, in a process separate from the Development Consent Order. The Boards will continue to liaise directly with the applicant in that process, and is likely to require further information (i.e. in addition to that provided in the EIA) to inform our decision-making for such consents.

Yours sincerely,



Judith Stoutt
National Infrastructure Officer
Water Management Alliance

Response from Welton le Marsh and Willoughby & District Parish Councils

Comments with respect to PINS Scoping Opinion Grimsby to Walpole (EN020036)

National Grid's (NG's) Scoping Report is ostensibly for one line of 50m 400kV pylons from Grimsby to Walpole, with new substations at Grimsby and Walpole, and two at Alford ('southwest of Mablethorpe' in all NG documents). The carrying capacity of a single 400kV pylon is less than 7GW but the new projects cited by NG to justify the Grimsby to Walpole proposal total 9.764GW. To accommodate this NG would need at least two lines of pylons. Up to 7GW of power would also be routed south from Grimsby into Alford. If this is approved, it is likely that projects already in the planning process (like ODOV) will be rerouted into the Alford substations - why would any project bury cables from Alford to Walpole when there is no need? In addition, there are numerous large scale (1GW+) solar farms mooted along the proposed route which will also require connection, hence all the vague LCS's incorporated in this document. The Alford substations will need capacity for c22GW+ (source NG) and note that there is no local requirement for any of this new renewable generation, the area is already in net spill (ie exports power to elsewhere).

To accommodate all this proposed generation, NG would require **two** 400kV lines from Grimsby to Alford and **three** 400kV lines from Alford to Walpole. Grids are designed largely in a 'boxed format' so NG would then require also a new 400kV line from Alford to Lincoln. According to NG, some 30GW is due to be brought into the B8 boundary and recently the government announced even more ambitious licensing of additional renewable generation, some of which may be landed into the Eastern coast. Alford alone could easily end up being a 40GW+ hub. Accommodating all the export routes southwards, and the various associated onshore facilities, would entail vast areas of land being dedicated to electrical infrastructure. We believe that the proposed one set of 400kV pylons and substations represents the first enabling step for the conversion of vast swathes of rural Lincolnshire, and beyond, into a series of industrial-scale electrical complexes connected by multiple sets of 50m pylons.

To cover the true scale and potential impact of this project, we therefore respectfully request (**requests are in bold**) that the Scoping includes the following eleven points:

1. **The Scoping Area should be extended to cover the whole of the 'Overhead Study Area' as shown in Figure 3.2 of the Scoping Report. (Also, the 'Overhead Study Area' should be enlarged to cover the whole of the potential pylon/associated infrastructure corridors – this is not currently the case – see Fig, 3.2).**
2. **The PEIR, EIA and ES study area should extend 5kms from the boundary of the 'Overhead Study Area' and be extended, where appropriate, to the 'Limit of Deviation'.** The topography of the route means that this development will have a significant visual and cumulative impact as the landscape, being mainly flat, is highly sensitive to change. The significance of 50m pylons is not mitigated by distance in a flat landscape of large arable fields. If the 'apparent height' of a 50m pylon at 5km is 0.61cm as claimed by the applicant, then a 25m building would appear as 0.31cm. Most structures in the landscape along the route(s) are isolated farm buildings less than 15m high, therefore the visual and cumulative impact of even a single line of pylons and associated infrastructure would be significant. This development would change the landscape character throughout the route.
3. Because of the impact of the proposed development in a (mainly) sparsely populated rural area, **all 'additional measures', 'secondary measures', 'ancillary development' and 'associated ancillary development' should be included in the Scoping and anything (apart from temporary measures necessary for construction), not included within the Scoping and EIA should not be accepted as part of the DCO.** Otherwise, there is a risk that additional lines of

pylons and substations (as illustrated in Figures 3.2 & 3.4) are included in the final DCO Application without any public consultation or environmental impact assessment.

4. The Visual Impact study area should be extended to the coast (in particular around the Gibraltar Point NNR); and the eastern edge of the Lincolnshire Wolds AONB.

5. Several Heritage assets of national importance (Grade 1), which are likely to be seriously impacted (i.e. significantly harmed) by the proposed development are not included in the current study area. **All Heritage assets (Listed Buildings, scheduled monuments and listed Parks & Gardens) within 5kms of the 'Overhead Study Area' should be included in the PEIR/EIA/ES.**

6. Photomontages and wirelines for the Visual Impact Assessment should be from viewpoints specifically agreed with local communities from every parish within the Visual Impact Study Area (e.g. Parish Councils; Parochial Church Councils/District Church Councils; walkers/ramblers associations; Parish Meetings; residents etc.; i.e. 'the different groups of people likely to be affected by the project' (Scoping Report 7.18.17).

7. Photomontages and wirelines should be provided in hard copy (printed at the optimal size for viewing), to all Parishes within the Visual Impact study area (minimum 10km radius from the Scoping Area); and on request to any member of the public. Photomontages cannot be properly used by a layperson on a computer screen. (Also, many areas within the route are Wi-Fi blackspots and there is no superfast broadband, so the files are too large to open).

8. All photomontages and wirelines should conform to the Nature Scotland (2017 and updates) Visual Representation of Wind Farms Guidelines. Panoramic photomontages should be accompanied by a single photomontage from the same viewpoint taken at 50mm focal length.

9. There is an overlap between substations LCS 6 & 8 (i.e. LCSB) in the Scoping Report (Figure 3.4), and the siting zone for the convertor station and direct current switching station in National Grid's EGL 3&4 Project Background Document. NG should make it clear which project the proposed developments belong to. Since, **if the Grimsby to Walpole Project is consented, EGL 3 & 4 will be added to the overhead lines (Table 4.3), rather than taking the buried cable route to Weston Marsh (as currently proposed), then it would be more cost-effective to combine the two projects at this stage and extend the Scoping Area and EIA appropriately.**

10. Full flood risk assessment for inundation of seawater relating to storm surges, collapse of levées, breach of riverbanks, flash flooding, etc should be conducted for the whole (revised) Scoping Area.

11. Finally, there is a serious issue of broadband availability along the whole route, therefore we request that **in addition to providing the photomontages (see 7 above), the applicant makes all consultation documents freely available in hard copy at locations open to the public during working hours, and at weekends (many libraries in the affected area, Alford for example, only open 4 days a week). The documents should also be made available on free memory sticks provided by NG at public information days and on request.** Otherwise, many of those most affected by the proposed development will be unable to access the information required to comment on it.

29/08/2024



Guildhall
Marshall's Yard
Gainsborough
Lincolnshire
DN21 2NA

Telephone 01427 676676
Web www.west-lindsey.gov.uk

Planning.customer.care@west-lindsey.gov.uk

Date: 30/08/2024

Dear Sir/Madam

Application Number: WL/2024/00610

Proposal: PINS consultation on behalf of the Secretary of State for its opinion (a scoping Opinion) as to the information to be provided in an Environmental Statement - EN020036

Location:
GRIMSBY TO WALPOLE PROJECT

Dear Sir/Madam

I refer to the above. West Lindsey District Council have no observations / comments to make on the Scoping Opinion.

Yours faithfully

George Backovic

@west-lindsey.gov.uk

On behalf of West Lindsey District Council

If you require this letter in another format e.g. large print, please contact Customer Services on 01427 676676, by email customer.services@west-lindsey.gov.uk or by asking any of the Customer Services staff.

If you want to know more about how we use your data, what your rights are and how to contact us if you have any concerns, please read our privacy notice:

www.west-lindsey.gov.uk/planning-privacy

Planning Services Feedback

We value your opinion on our service, as your comments will help us to make improvements. Please visit our website where you may either make your comments online or download our feedback form to fill in and post back: www.west-lindsey.gov.uk/planning

From: [Beighton, Dave](#)
To: [Grimsby to Walpole](#)
Subject: Grimsby to Walpole (our reference - ENQ/24/1507)
Date: 30 August 2024 08:45:29

You don't often get email from [REDACTED]@westsuffolk.gov.uk. [Learn why this is important](#)

FAO Hannah Terry,

On behalf of West Suffolk Council as Local Planning Authority I am confirming that it has no comments to make and does not wish to be consulted further on this matter.

Kind regards.

Dave

Dave Beighton
Principal Planning Officer
Planning Development
Direct Dial: [REDACTED]
Email: [REDACTED]@westsuffolk.gov.uk
www.westsuffolk.gov.uk
West Suffolk Council
#TeamWestSuffolk

West Suffolk Council supports our staff to work flexibly and we respect the fact that you may also be working at different times to suit you and your organisation's needs. Please do not action or respond to this message outside of your own working hours.

[Report, pay and apply online 24 hours a day](#)
[Find my nearest for information about your area](#)

West Suffolk Council is the Data Controller of the information you are providing. Any personal information shared by email will be processed, protected and disposed of in accordance with the General Data Protection Regulations and Data Protection Act 2018. In some circumstances we may need to disclose your personal details to a third party so that they can provide a service you have requested, fulfil a request for information or because we have a legal requirement to do so. Any information about you that we pass to a third party will be held securely by that party. For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website: [How we use your information](#).

***** This email is confidential and intended solely for the use of the individual to whom it is addressed. If you are not the intended recipient, be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. If you have received this email in error please contact the Sender. This footnote confirms that this email message has been swept for the presence of computer viruses and content security threats. WARNING: Although the Council has taken reasonable precautions to ensure no viruses are present in this email, the Council cannot accept responsibility for any loss or damage arising from the use of this email or attachments.
*****_W-S_

West Walton Parish Council response to the scoping consultation and notification in respect of the Grimsby to Walpole Project

Introduction

For the purposes of this document, the Parish Council will use the terms 'we' and 'our'.

The Grimsby to Walpole Project consists of an Overhead Pylon Line and a new Substation, Walpole B.

1. A new 400 kV Overhead Pylon Line; pylon being approximately 50 m in height but can be 60 m in height in difficult areas. A typical span distance between pylons is approximately 350 m. In broad terms there are typically three pylons for every kilometre of overhead line.

It is likely that the proposed pylons for the Project would comprise steel lattice with three arms on either side of a central body. Typical heights for steel lattice pylons are around 50 m, however the proposed height of each pylon would depend on the specifics of each location such as topography, land use and crossings.

Alternative pylon designs may also be considered, where mitigation (e.g. for landscape and visual effects) is required. The alternative designs which may be considered are:

- Low height steel lattice; and
- T pylon

Construction of the pylons will involve:

- haul roads, soil storage and drainage, typically about 21m wide swathe
- a working area of 70m x 70m
- use of a 250T crane

2. A new Walpole B Substation that will connect to the existing 400 kV 4ZM transmission line that runs north from Burwell towards the existing Walpole Substation. The functional footprint of the substation (assumed at this stage, is an AIS substation) is up to 800 m by 200 m (approximately 16 ha) It should be noted that this excludes related development including access arrangements, drainage, landscaping and other associated environmental works. It is also unclear at this stage, if Grimsby to Walpole Project will be responsible for the construction of this part of the project or the concurrently running project EGL 3&4.

It must also be noted that there is a concurrent project for EGL3 & EGL 4 which adds to the construction issues and is under a separate consultation.

The combination of two projects - Grimsby to Walpole and EGL3 & EGL4 will be the largest amount of new construction in one area for all of these projects.

At present, there is no 'ownership' of the proposed new substation 'Walpole B' as it has been incorporated into both Grimsby to Walpole and EGL3 & EGL4 proposals

Two further projects that have been mentioned in other National Grid Publications but not presented to the Parish Council

- The Stratera Electrolyser and Combined Cycle Gas Turbine (CCGT) mentioned in EGL3 & EGL 4 Corridor and Preliminary Routeing and Siting Study Report April 2024 page 56.
- The LRN6 – a new onshore transmission circuit from South West Lincolnshire/Cambridgeshire/North West Norfolk Boundary to Hertfordshire contained in the publicly available document 'Beyond 2030' (nationalgrideso.com) published in March 2024 page 100.

Our comments on the EIA

We believe the Siting Zones WLP4 and WLP5 locations for the pylons and sub stations are highly unsuitable as:

This project will result in the loss of Grade One BMV, high-quality, highly productive and versatile farmland. It is claimed in documentation there are planning and construction methodologies designed to protect and preserve the agricultural value of the land we work on and land will be restored to its original aiming to maintain productivity. This is impossible in the case of a new substation as 16Ha plus will be removed from food production. We believe that the Horlock Rule 6 is being overlooked in respect of the Grade 1 agricultural land in WPL4 and Grade 2 in WPL5.

Flood Risk is being downplayed in the preferences for WPL4 & WPL5 in respect of cost effectiveness. WPL4 & WPL5 are in flood zone 3. There will also be concerns regarding the industrial construction of a new substation and water run-off from concreted areas and the risks posed to neighbouring land and properties.

Statements published in the Government Plan – A Green Future – Our 25 Year Plan to Improve the Environment – published in 2018.

New development will happen in the right places, delivering maximum economic benefit while taking into account the need to avoid environmental damage. We will protect ancient woodlands and grasslands, high flood risk areas and our best agricultural land. (page 35)

And the following statement

Our farms provide so much more than just food. They provide recreational activities to an estimated value of £200m for farms and nearly £300m a year for woods. Furthermore, the way farmland and woodland filter the air is valued at £182m and £794m per annum. (page 42)

It is also contrary to published Government and Natural England guidance and policy – Guide to assessing development proposals on agricultural land [Guide to assessing development proposals on agricultural land - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/guide-to-assessing-development-proposals-on-agricultural-land)

1. Policies to protect agricultural land and soil

Developers and local planning authorities (LPAs) should refer to the following government policies and legislation when considering development proposals that affect agricultural land and soils. They aim to protect:

- the best and most versatile (BMV) agricultural land from significant, inappropriate or unsustainable development proposals
- all soils by managing them in a sustainable way.

1.2 National Planning Policy Framework (NPPF)

LPAs should use the NPPF to make decisions about the natural and local environment to:

- protect and enhance landscapes, biodiversity, geology and soils
- recognise soils as a natural capital asset that provide important ecosystem services
- consider the economic and other benefits of BMV agricultural land, and try to use areas of poorer quality land instead of higher quality land
- prevent soil, air, water, or noise pollution, or land instability from new and existing development

NPPF - [Chapter 15: Conserving and enhancing the natural environment](#) (for full details).

In particular Paragraph 180

180. Planning policies and decisions should contribute to and enhance the natural and local environment by:

(a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

(b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

There appears to be a lack of scoping in respect of the finished size of the Sub-Station (see item 2). Horlock Rule 8: Space should be used effectively to limit the area required for development consistent with appropriate mitigation measures and to minimise the adverse effects on existing land use and rights of way, whilst also having regard to future extension of the substation. The proposed completed substation size is unknown and a lack of information regarding landscaping and ancillary requirements.

There are considerable concerns about a 'wirescape' and 50m high pylons dominating the landscape and skyline of the open, flat countryside of the parish. Holford Rule 6: In country which is flat and sparsely planted, **keep the high voltage lines** as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration or 'wirescape'. Note on Rule 6: In all locations minimise confusing appearance.

The intrinsic character of the flat, open fenland 'big sky' landscape has not been recognised in the document.

The road network is highly unsuitable. The roads are poorly maintained and very narrow. In particular, the suggested routes via Mill Road, to Walpole Bank are potholed and badly repaired. Promises were made by the developer and never materialised. Lynn Road to West Drove North is no better. West Drove North has ongoing problems with subsidence in parts. Previous construction projects, such as the onshore substation for the Race Bank wind farm, which affected the village of West Walton with construction traffic were accompanied with undertakings to repair and revert the roads but these have never been honoured.

Noise and vibrations from construction traffic - It cannot be assumed that roads are free from irregularities anywhere in the United Kingdom. All roads in the West Walton and Walpole area have irregularities and it can easily be proven by simply visiting the area in a vehicle. Light traffic makes a sound but does not vibrate whole buildings. Heavy traffic makes lots of noise and makes whole buildings vibrate. There is no doubt that there will be an impact to buildings and homes from the heavy construction traffic.

The statement assuming the roads are free from irregularities is clearly ill-thought and it is wrong to make such an assumption. **This assumption needs to be re-visited.**

It has been recorded by Historic England on the Heritage at Risk Register that St Mary the Virgin Church at West Walton suffered severe subsidence, in 2016. This is as a result of daily passage of HGV construction traffic to the onshore substation at Walpole Bank for the off shore wind farm.

Soil tests in the churchyard show there is a silt base which makes the church vulnerable to vibration. Repairs and monitoring is ongoing to the building, which is Grade 1 listed.

The Church dates from 1250, as mentioned earlier, is undergoing repairs and monitoring, any further vibration could increase damage and we may lose a valuable, historic part of our community.

No references to the Jubilee Walk, a circular route of 7 miles around the parish comprising of green lanes and permissive paths which is popular with the residents in the parish and attracts visiting walkers, cyclists and horse riders have been included in the document. **This must be considered.**

It must also be noted that there is a nature reserve and flood marsh in WPL4 attracting various species of birds and animals, providing breeding ground cover, habitation and food. Again, this important and delicate environment will be severely impacted, if not completely destroyed, by the presence of a huge industrial site. **This must be considered.**

Conclusion

There appears to be a lack of 'joined up thinking' in respect of the projects for Grimsby to Walpole and EGL 3 & 4. The timing of both sets of projects will be concurrent.

The combination of Grimsby to Walpole and EGL 3 & 4 projects is proposing the largest amount of construction in West Walton parish. There appears to be a lack of parity between the projects with EGL 3 & 4 preferring to use underground cabling and Grimsby to Walpole dismissing this consideration entirely. The only link up between the projects appears to be which one will be responsible for the proposed new substation.

The proposed siting zones WLP4 and WLP5 should therefore be urgently reconsidered in order to avoid significant detriment to the environment, increase in flood risk from industrial concreted areas, detriment to farmland, damage to the infrastructure of the village and damage to the church and avoid the creation of dominating industrial landscape in a small rural village as well as reducing as far as possible inconvenience to the residents, businesses and schools.

Serious consideration should be given to designing a route in order that construction traffic can access the proposed site as directly as possible in order to minimise damage to the infrastructure of the village of West Walton and its environs and church. Accessing all the proposed construction sites will cause significant disturbance, damage and detriment to the lives of local residents, businesses, the infrastructure of the village/s, farmland, wildlife and the environment. The resulting dominating industrial landscape and any associated wirescape will be detrimental to the intrinsic nature of our flat, open countryside and big skies.

The fact that there are all these projects culminating at the same time, in the same place is unprecedented and there is no consideration of the double impact of this.

Not only a double impact but a quadruple impact is added with the following two proposals:

- the Stratera Electrolyser and Combined Cycle Gas Turbine (CCGT) mentioned in EGL3 & EGL 4 Corridor and Preliminary Routeing and Siting Study Report April 2024 page 56

and

- a further project LRN6 – a new onshore transmission circuit from South West Lincolnshire/Cambridgeshire/North West Norfolk Boundary to Hertfordshire contained in the publicly available document 'Beyond 2030' (nationalgrideso.com) published in March 2024, with the rationale that there will be a '*reduced impact on environment and local communities*'. National Grid has not even hinted at this proposal for a consultation at present and whilst publicly available, it is only if anyone has time to 'dig' within the National Grid website to find it.

National Grid is drip feeding projects to the public. The above statement about reduced impact is wrong if applied to our community as a further two lines of pylons or cabling commencing at either the new substation or the existing one will cause plenty of disturbance and add, possibly, to the wirescape etc. contrary to Rule 6 of the Holford Rules.

A quadruple impact on this community has not been considered by National Grid and the lack of publicity for a third and fourth project is unbelievable. This can also be described as a lack of consideration to the local community and, again, a lack of 'joined up thinking' in not presenting all the planned projects to this community that will be forced to bear huge amounts of upheaval during construction and have to live with an enforced Industrial Landscape.

Whilst there may be some comments within this response that are outside the scope of the consultation, we strongly feel that National Grid must take all of these issues on board. They must engage fully with the community and within the community of West Walton, not just host events in other parishes as they have up to now. They must host consultation and information events within West Walton itself. They must ensure the whole of the community of West Walton is aware of the all projects, not just send information only to properties that may be affected, neighbour or be within a certain distance of the project. They must be open and honest with the community and must not drip feed projects. The current 'drip feed' is overwhelming to statutory consultees, stakeholders and members of the affected communities. A complete overview of proposals for all projects must be made a priority and conveyed to this community.

Submitted to Grimsby to grimsbytowalpole@planninginspectorate.gov.uk on 31st August 2024.

From: [Kevin Prince](#)
To: [Grimsby to Walpole](#)
Cc: [REDACTED] [@sholland.gov.uk](#)
Subject: Whaplode parish council scoping report.
Date: 30 August 2024 11:57:40

You don't often get email from [REDACTED] [Learn why this is important](#)

Sent from [Mail](#) for Windows

Potential impacts on landscape :-

The erection of pylons through the parish of Whaplode will irreversibly impact on the visual outlook of villagers due to the flat landscape

Of the area, being a part of the Lincolnshire Fens an area of great importance to wildlife and food security. With the planned pylon route cutting through the village of Whaplode st Catherine a small village, these pylons will be seen no matter where you stand in the village.

The residents have been asked for their opinions and feel it unfair that other options such as subsea or underground which can possibly be quicker and less disruptive on communities are not being considered at this time. Most of the properties in and around Whaplode st Catherine are bungalows and occupied by retired people so the pylons will be an unwanted eyesore.

Potential impacts on natural environment:-

The impact on the natural environment will be hugely damaging. Most of the roads are small country lanes which are unsuitable for heavy construction traffic. A lot of these roads have drainage dykes running along side of them and the potential damage caused by construction traffic to these dykes will be devastating not only to the residents but the flora and fauna. The wildlife in and around this area will be greatly damaged, animals that are protected by law. In this parish alone we have Bats, newts, different types of deer. Also we have barn owls, tawny owls, little owls and short eared owls.

Then we have the birds that rely on the water courses such as herons, egrets, ducks and kingfishers to name but a few, we also have migratory birds that come in on the proposed UNESCO migratory superhighway such as swans and geese. Then we have water voles, stoats, weasels and other river side animals not forgetting the fish as well. There are also disruption to bee colonies to consider, and animals that live in the hedgerows, all to many to name.

Potential impacts on residents:-

What steps will be taken to lessen the impact on residents of the parish of Whaplode during and after construction. Can you demonstrate how you plan to limit light and noise pollution and to keep levels of dust down as this can cause major problems with breathing especially for people who already have asthma. People who live in small villages appreciate the dark star laden skies how will you guarantee these and daytime vistas will not be spoilt. Any road closures will have a negative effect on elderly residents in outlying villages who rely on local transport.

Can you unequivocally state that there are no health risks to be concerned about living in close proximity to these pylons, such as leukemia, brain tumours and micro shocks, all of which have been documented in the past and not been disproved. Also the loud buzzing noise from the overhead lines which can potentially affect residents that live in close proximity' mental health.

Has there been a survey to evaluate the heightened risk of flooding or the devaluation of property in the area, how will you approach these matters.

Potential impact on businesses :-

How will you negate the impact this project will have on farmland. You will be destroying thousands of acres of grade 1 and grade 2 farmland for years to come. The loss of this farmland will greatly decrease the crops grown in Lincolnshire, with a potential knock on effect of increasing the countries carbon footprint as the loss of crop growing land would mean we would have to rely on importing food. This will not only be during construction but after construction has been completed. Can you guarantee that during harvest periods access to fields will not be hindered. There are also a lot of holiday parks in this area how will you compensate these businesses for loss of revenue.

Potential impacts on existing infrastructure :-

Has a survey been carried out in regards to the effect of heavy construction traffic using the already crumbling narrow country lanes in the Whaplode parish area. What contingency plans are in place to mitigate the effect on rural transport links. What plans will be put in place to prevent any contamination of water courses and prevent flood risks and how will you prevent dangerous diesel particulates from poisoning local residents and wildlife. What will you do to keep the carbon footprint of construction traffic down to a bare minimum.

Potential safety risks :-

What measures will be put in place during and beyond construction to mitigate the risks to village residents and workers alike. In small rural communities ambulance response times are already slow, if they have to follow a lengthy diversion it could potentially lead to fatalities.

Environmental issues arising from this project :-

Can you explain and if so demonstrate the potential increase in the carbon footprint this project will have. For example, where will the materials to construct the pylons come from and how will you transport it. How much Co2 is estimated to be pumped into the atmosphere during construction and how will you be able to reduce it. Why have greener options appear to have been dismissed.

Regards

Kevin Prince

Whaplode Parish Councillor

From: [Derek Braddy](#)
To: [Grimsby to Walpole](#)
Cc: [drainage](#)
Subject: Re: EN020036 - Grimsby to Walpole Project – EIA Scoping and Consultation & Regulation 11 Notification
Date: 20 August 2024 16:15:36
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[Outlook-viq3rkyx.png](#)

You don't often get email from [REDACTED]@w4idb.co.uk. [Learn why this is important](#)

To whom it may concern

Witham Fourth District IDB and its officers are aware of the above project and have had some initial conversations with Carl Simms of National Grid but are, yet to sit down and discuss specific details regarding the Proposed Route and IDB asset interfaces.

The current route of the proposed National Infrastructure project has a significant impact on the Boards maintained watercourse and operations. At this early stage we don't have a definitive route and design so our comments will be generalised to cover the expected implication. We expect to see the Land Drainage Act disestablished but the necessary provisions will be catered for in a Protected Provisions in the DCO which will be agreed with the Board, and we look forward to conversations with National Grid to minimise the impact on the Board and its operations.

General Comments:

1. There are several Board maintained watercourses that exist within the boundary of the proposed works and to which BYELAWS and the LAND DRAINAGE ACT applies:
 - a. No person may erect any building or structure (including walls and fences), whether temporary or permanent, or plant any tree, shrub, willow, or other similar growth within 9 metres of the top edge of the watercourse/edge of the culvert without the prior consent of the Board.
 - b. Please note the Board will not consent any permanent or temporary construction within the 9 metres BYELAW easement. Please refer to the Board's Nine Metre Easement Policy for further information: <https://www.w4idb.co.uk/resources/document-library/consent-forms-and-guidance/>

Consent Forms | Witham Fourth District Internal Drainage Board

For the following Witham Fourth District IDB consent forms please contact the office:
Application to Culvert a Watercourse, Application to Discharge Surface Water into a Watercourse, Application to Discharge Treated Water into a Watercourse.

www.w4idb.co.uk

- c. Where any proposed cables are to be directionally drilled beneath a watercourse consent

will be required and must be at agreed depths. More detail on this can be supplied and should be discussed in further detail.

2. There are several Riparian watercourses that exist within the boundary of the proposed works and to which the Land Drainage Act applies:
 - a. Under the terms of the Land Drainage Act 1991, the prior written consent of the Board is required for any proposed temporary or permanent works or structures within any watercourse including infilling or a diversion.
3. Board's Byelaw consent is required to directly discharge surface water to a watercourse (open or piped). A surface water development contribution (SWDC) will be charged on all rates of discharges. Please refer to the Board's Development & Consent Control Guidance for more information: <https://www.w4idb.co.uk/resources/document-library/consent-forms-and-guidance/>

Consent Forms | Witham Fourth District Internal Drainage Board

For the following Witham Fourth District IDB consent forms please contact the office:
Application to Culvert a Watercourse, Application to Discharge Surface Water into a Watercourse, Application to Discharge Treated Water into a Watercourse.

www.w4idb.co.uk

4. The Board do not fully support the use of subbase reservoirs and questions their suitability as an effective long term SUDS solution.
5. Board's Byelaw consent is required to discharge treated water to a watercourse (open or piped).
6. Board's Section 23 consent is required to culvert, pipe, or bridge any watercourse riparian or Board maintained.
7. The suitability of new soakaways, as a means of surface water disposal, should be to an appropriate standard and to the satisfaction of the Approving Authority in conjunction with the Local Planning Authority. If the suitability is not proven the Applicant should be requested to re-submit amended proposals showing how the Site is to be drained. Should this be necessary this Board would wish to be re-consulted.
8. A permanent undeveloped strip of sufficient width should be made available adjacent to the top of the bank of all watercourses on Site to allow future maintenance works to be undertaken.

Suitable access arrangements to this strip should also be agreed. Access should be agreed with the Local Planning Authority, Lincolnshire County Council and the third party that will be responsible for the maintenance in consultation with the Internal Drainage Board where a watercourse is subject to Byelaws (see Section 2 & 3)

9. All drainage routes through the Site should be maintained both during the works on Site and after completion of the works. Provisions should be made to ensure that upstream and downstream riparian owners and those areas that are presently served by any drainage routes passing through or adjacent to the Site are not adversely affected by the development. Drainage routes shall include all methods by which water may be transferred through the Site and shall include such systems as "ridge and furrow" and "overland flows". The effect of raising Site levels on adjacent property must be carefully considered and measures taken to negate influences must be approved by the Local Planning Authority.

10. Consideration must be given to the route of flow downstream of the site from the discharge point to an appropriately maintained watercourse. Are there any off site works or the need for increased maintenance required to safeguard the site discharge for the life of the development.

Many Thanks

Kind Regards

Derek Braddy BSc (Hons) I.Eng MICE
Engineering Manager
Witham Fourth District Internal Drainage Board
47 Norfolk Street
Boston
PE21 6PP

T: [REDACTED]

www.w4idb.co.uk



This email is for the use of the intended recipient only and is confidential. Disclosure, copying, or distribution of its contents is prohibited unless agreed by the Board. The Board accepts no liability for loss or damage caused by virus software.

From: [Parish Clerk](#)
To: [Grimsby to Walpole](#)
Cc: [REDACTED]@withernstaingov.uk; [REDACTED]@withernstaingov.uk; [REDACTED]@withernstaingov.uk; [REDACTED]@withernstaingov.uk; [Ian Keal](#)
Subject: Updated Withern and Stain Comments
Date: 30 August 2024 07:12:19
Attachments: [Report Against the Proposed National Infrastructure Project 29th Aug.docx](#)

You don't often get email from parishclerk@withernstaingov.uk. [Learn why this is important](#)

Dear Planning Inspectorate,
Please find enclosed the updated report to include more specific local examples of the impact of this proposed project on the local area.
Many thanks
Sarah Kennett
Clerk to the Parish Council

On 28/08/2024 18:21 BST Parish Clerk <parishclerk@withernstaingov.uk> wrote:

Dear Sir/Madam,
Please find enclosed the report compiled by the Withern and Stain Parish Council, incorporating the views of the Parish on the planned Grimsby to Walpole Pylon link.
Kind regards
Sarah Kennett
Parish Clerk

Report Against the Proposed National Infrastructure Project

Potential Impacts on the Landscape

Local and Wider Area Considerations

The proposed infrastructure project, particularly the installation of pylons and substations, will have significant visual impacts on the predominantly flat landscape of Lincolnshire. The county's open vistas and uninterrupted horizons are key features of its character, and the introduction of towering pylons would disrupt these views, detracting from the area's natural beauty. This could diminish the aesthetic and cultural value of the landscape, potentially affecting the identity of the region as a place of quiet, rural charm.

Additionally, the pylons will be a considerable eyesore, impacting both local residents and transient visitors who come to the area to enjoy its unspoilt rural scenery. The visual intrusion of the pylons would not only degrade the experience of those living in the area but also discourage tourism, which is a vital part of the local economy.

Mitigation Strategies

To mitigate these visual impacts, several strategies should be explored thoroughly:

- **Undergrounding Cables:** Burying the power lines underground would eliminate the visual impact entirely. Although more expensive, this option would preserve the landscape's natural appearance and protect its intrinsic value. Furthermore, it is not acceptable to run the power supply under the sea along the coast of Scotland and then bring it onshore in Lincolnshire. It should be routed under the sea along the coast of Lincolnshire, no matter the cost differential, to minimise onshore disruption.
- **Offshore Integrated Grid:** Shifting the infrastructure offshore, where feasible, could minimise the onshore disruption. This approach should be thoroughly assessed as it could offer a less intrusive solution.
- **Landscape Screening:** Where above-ground infrastructure is unavoidable, planting trees and shrubs could partially screen the pylons and substations, blending them into the landscape. However, given the flat terrain, the effectiveness of this strategy may be limited.

Without a full assessment of these alternatives, proceeding with the project would be premature and potentially harmful to the region's visual heritage, particularly concerning areas of natural beauty such as the Wolds and wildlife reserves on the coast, both of which are in close proximity to the proposed infrastructure.

Potential Impacts on Natural Environments

Environmental Impact During Construction and Operation

The construction and long-term presence of this infrastructure will disrupt local ecosystems. Lincolnshire's flat terrain is home to various wildlife species, including birds, mammals, and insects, that rely on the area's hedgerows, watercourses, and fields for habitat. The construction process will likely involve significant earthworks, potentially leading to:

- **Disturbance of Habitats:** Construction activities, such as trenching and the movement of heavy machinery, could destroy nesting sites, disrupt feeding patterns, and displace wildlife. The proximity of the project to important wildlife reserves on the coast could exacerbate these impacts, threatening both local and migratory species.
- **Watercourse Contamination:** The disruption of soil and vegetation can lead to increased runoff, carrying sediment and pollutants into local watercourses, harming aquatic ecosystems.
- **Hedgerow Removal:** Hedgerows, which serve as vital wildlife corridors, might be removed or damaged, fragmenting habitats and threatening biodiversity.
- The East Coast flyaway migratory corridor along the Lincolnshire coast falls within the community of South Reston. Migratory geese have already caused power cuts for more than just our community (the last on 7th July 2024) by flying into overhead high voltage cables.
- **The significant noise levels** caused by construction and the production use of the pylons will be detrimental to the health and well-being of our elderly residents. Around 40% of our combined community is retired and chose this area due to its peace and serenity, which will be destroyed permanently. Should the project be considered, the addition of soundproofing to all properties along the route should be included in the proposal.
- **The environmental damage**, including that caused by construction works will be long-term and permanent and be a visual eyesore, dissuading tourists and migrants alike from visiting or moving here. At a time when we are trying to grow our community and add facilities, this will drive people away and out of their homes. Tourists will not visit, hikers will not come through, countryside activities here will cease.

Mitigation Measures

To minimise these impacts:

- **Strict Construction Scheduling:** Avoiding construction during breeding seasons could help protect wildlife.
- **Habitat Restoration:** Post-construction efforts should include replanting hedgerows and restoring habitats to support wildlife recovery.
- **Buffer Zones:** Establishing protective buffer zones around watercourses and sensitive habitats could reduce the risk of contamination.

These measures are essential to safeguarding Lincolnshire's natural environment from irreversible damage, particularly given the area's proximity to an Area of Outstanding Natural Beauty (AONB), namely the Wolds.

Potential Impacts on Residents

Disruption During Construction

The construction phase is likely to cause significant disruption to local residents. Issues may include:

- **Noise and Light Pollution:** Construction activities, often extending into early morning or late evening, will introduce noise and light pollution into otherwise quiet, dark rural areas.
- **Dust and Air Quality:** The movement of heavy machinery and earthworks will generate dust, potentially affecting air quality and causing health problems for residents, particularly those with respiratory conditions.
- **Road Closures and Traffic:** The influx of construction vehicles could lead to road closures and increased traffic on narrow country lanes, disrupting daily routines and access to essential services. The traffic disruption associated with installing the pylons is a major concern, as it would further strain already congested rural roads.

Long-Term Health and Property Concerns

- **Health Impacts:** The presence of high-voltage pylons near residential areas has been linked to potential health risks, including increased exposure to electromagnetic fields (EMFs). Although research is ongoing, to the best of our knowledge, it has never been conclusively proven that pylons and their cables are not responsible for ill-health clustering, including carcinomas. The precautionary principle suggests minimising residential proximity to such infrastructure.
 - A number of residents in our communities suffer from pre-existing health issues including autism. These residents are diagnosed with auditory processing issues and will be unable to filter out the buzzing of the cables in such close proximity thus impacting their mental health, on top of the noise and impact of construction.
 - The radiation implications on health cannot be ignored and this route passes far too close to many residences in the villages of our community.
- **Property Devaluation:** The visual and environmental impacts of the infrastructure could lead to a decline in property values, negatively affecting homeowners. This detrimental effect on property prices is a significant concern for residents who may see their homes lose value due to proximity to the pylons.
- **Flood Risks:** Groundworks could alter drainage patterns, increasing the risk of flooding, particularly in areas where drainage systems are already under strain.

Prevention Strategies

- **Enhanced Planning:** Careful planning of construction schedules, with input from the local community, could reduce disruption.
- **EMF Shielding:** Implementing technology to shield residents from EMF exposure should be considered.
- **Flood Mitigation:** Drainage improvements and monitoring during construction could help prevent an increase in flood risks.

Potential Impacts on Businesses

Effects on Farming and Tourism

Lincolnshire's economy relies heavily on agriculture and tourism, both of which could be adversely affected by the proposed infrastructure:

- **Loss of Agricultural Land:** The project may result in the permanent loss of prime farmland, reducing agricultural output and harming farmers' livelihoods. The loss of productive agricultural land during the installation of the pylons, as well as the land lost when they are in situ, represents a significant economic and environmental cost.
- **Tourism Disruption:** Construction activities and the subsequent presence of large pylons could deter tourists, who are drawn to the region for its peaceful rural landscapes. This could lead to a decline in visitor numbers and negatively impact local businesses reliant on tourism.
- **The impact on local businesses operating in the tourism, service and equine industries**
 1. The percentage of residents working in or operating businesses linked to tourism is very high (at least three campsites, caravan/camper sales, and seasonal trade for the public house). These local businesses would be hugely impacted by both the construction in the short to midterm and the existence of the pylons in the long term, causing severe hardship in the community.
 2. Two businesses are operating in the equine industry.
 - 2a. One business, a trainer and retrainer of horses, anticipates demand for the service in this location disappearing should the pylons be constructed. Owners send their horses to this business for periods of time for them to be retrained safely and professionally. Doing so does not allow for getting them accustomed to traffic, farming, cyclists, etc, when this access bisects routes heavily industrialised for pylon construction. In the longer term, the risk of micro shocks to both horses and riders of the high voltage cables requires study and proof that it will not be of detriment on the many off-road accesses and on-road riding routes used by this local business and local pleasure riders
 - 2b. The second business is a livery, offering accommodation and grazing for pleasure horses. This business has access to a public bridleway, which the pylon route will cross. Clearly, the business will suffer greatly due to construction in the first instance

since its clients will not be able to access any off-road routes. In the long term, the proximity of the pylons to this location will put off horse owners, given the concerns over radiation and the sensitive nature of equines around the noise emitted by the high-voltage cables.

- **The impact to other local small businesses**
The local area is home to several small businesses operating in building, construction, ventilation, landscaping, farming, motor vehicle and catering sectors, to name but a few. Many of these businesses are run administratively from home offices sited close to the proposed route of these pylons. The impact on operating those businesses cannot be understated – during construction, the noise, dirt and access issues and, in production, the electrical interference and operating noise (buzzing) of the high voltage cables will have a huge negative effect on those trying to work from home.

Mitigation Strategies for Businesses

- **Compensation for Farmers:** Farmers whose land is affected should be adequately compensated for the loss of productive land.
- **Minimising Disruption:** Construction schedules should be coordinated to avoid critical periods for farming activities, such as planting and harvest seasons.
- **Tourism Support Initiatives:** Marketing campaigns could be developed to promote the region's other attractions, offsetting any negative perceptions caused by the infrastructure.

Potential Impacts on Existing Infrastructure

Transport Disruption and Road Damage

The project will necessitate the use of heavy vehicles on Lincolnshire's narrow and often poorly maintained rural roads, posing several risks:

- **Damage to Roads:** The weight of construction vehicles could exacerbate existing road damage, leading to subsidence or complete road failure. The further damage to our already deteriorated roads caused by heavy construction vehicles will place an additional burden on local infrastructure, increasing maintenance costs and safety risks.
- **Increased Accident Risk:** The presence of large vehicles on narrow lanes will heighten the risk of traffic accidents, particularly with local drivers unfamiliar with such conditions.
- **Contamination Risks:** Damage to roads could lead to the spillage of materials, potentially contaminating nearby watercourses and contributing to flood risks.

Mitigation Measures

- **Road Strengthening:** Before construction begins, roads should be assessed and strengthened where necessary to accommodate heavy vehicles.
- **Traffic Management Plans:** Effective traffic management plans, including temporary road widening or the creation of bypasses, could reduce the risk of accidents and minimise disruption.
- **Regular Monitoring:** Ongoing monitoring of road conditions during construction will help identify and address issues before they become serious.

Potential Safety Risks

Risks to Workforce and Residents

Given Lincolnshire's rural nature, safety during the construction and operational phases is a significant concern:

- **Emergency Response Times:** The rural location of many construction sites may result in slow emergency response times in the event of an accident or incident.
- **Public Safety:** Residents, particularly children, could be at risk from open trenches, heavy machinery, and other hazards associated with construction sites.
- **Microshocks:** The phenomenon of microshocks, caused by the proximity to high-voltage power lines, could pose a risk to both residents and workers. This is a documented occurrence in areas with similar infrastructure, and measures must be in place to mitigate this risk.
- **Airfield Safety:** The proposed pylon line is likely to compromise both the airfield at Strubby and the long-established gliding club at Woodthorpe. These facilities are important local amenities, and any compromise to their safety and operation could have serious repercussions for the community.

Safety Measures

- **Enhanced Emergency Plans:** Emergency response plans should be developed in collaboration with local services, ensuring rapid response capability.
- **Public Awareness Campaigns:** Educating the local community about the risks and safety protocols during construction could help prevent accidents.
- **Microshock Mitigation:** Measures such as proper grounding and the use of insulating materials can reduce the risk of microshocks.
- **Airfield Consultation:** Engage with local airfields and gliding clubs to assess and mitigate the risks posed by the pylon line, ensuring their continued safe operation.

The local communities are particularly vulnerable given the size of the communities and sensitive local environment, wildlife including bats, bees, owls, water fowl and newts and to livestock. The proposed pylons are absolutely disproportionate to their surroundings and so large that current legislation is both out of date and unrepresentative. This should be reviewed urgently.

Whilst overhead pylons may prove the cheapest construction approach in immediate monetary value, they are not the lowest-cost long-term option. Burying or routing offshore resolves all of the concerns that would be raised in a proper public consultation. Moreover, it has been proven that the long-term economics of an undersea transmission system bear an insignificant difference in cost to the consumer than that of the overhead proposal.

We believe that prioritising the short-term gain of the National Grid shareholders over the long-term cost and consequence of the historic communities along this proposal's path will destroy the tourism industry and cost thousands of jobs and livelihoods by destroying the environment through which they would pass.

It should be noted that an approved scheme exists for an offshore cable to be run from Peterhead to Yorkshire, and a similar offshore route is now being reviewed from East Anglia to Kent following pressure from the public and members of parliament.

We are united with other communities and parishes in our objection to this proposal.