Withern with Stain Parish Council

Subject: National Grid Pylon Project Grimsby to Walpole

Dear Sir,

This representation sets out our formal objection of **Withern with Stain Parish Council** to the consultation. Given the nature and extent of the matters of concern to the Parish Council, it is not practical for these to be expressed using the format of NGET's consultation feedback form. This is further to the points we have raised in our earlier e mail on the 29th February 2024.

We believe that your decision to select an onshore overhead route (ECO5 – Grimsby to Walpole) in the Strategic Option report is incorrect for the following reasons:

1. **The rejection of an undersea route due to cost is inconsistent with the approach taken for other parts of the Grid upgrade and the cost basis for selecting for evaluating socio economic costs of on shore and undersea, is flawed and unfit for purpose.**
2. **The framing of the route decision based solely on the OCS5 line costs, and not factoring in the total project costs of connecting all the energy sources to the connection points, has missed significant additional costs associated with your proposal. Consideration of total project costs invalidates the selection of your current proposal.**
3. **Significant issues that were highlighted in your Strategic Options Report have been ignored, plus additional local factors that would drive increased costs and have not been factored into your decision.**

In the following pages, we will cover each point using the figures from National Grids Grimsby to Walpole documents, the Strategic Options Report (and addendum). In Conclusion we will propose a solution that is comparable in cost, achieves National Grid Requirements and would be more acceptable to the more of the Lincolnshire public.

1. <u>The rejection of an undersea route due to cost is inconsistent with the approach taken for other parts of the Grid upgrade</u>

The choice of ECO5 is stated as being made due to two main factors:

- It is of lower cost at £1998m than the undersea option ECSS2 at £4807m (full 40 year costs)
- The "socio economic" costs of overhead and undersea are the same

You are proposing to build 2 HVDC cables EGL3 and EGL4 running from Scotland to England. If you have applied the same cost model to these two cables it is clear that the costs of

running these undersea will be significantly greater than running these lines overhead from Scotland to England.

Yet, in this case with the same "socio economic" considerations and the same cost model applied you have decided to recommend the increased costs of undersea HVDC cabling, yet with the same model and similar socio economic cost models in use you have managed a different conclusion for Grimsby to Walpole. Clearly therefore a significantly different interpretation of "socio economic" costs has been made as the undersea costs by your own figures are significantly higher.

In your document you state that the socio economic costs " were not considered to differentiate between onshore and offshore option", however there is no data or analysis as to the basis this statement is made.

In the Strategic Options report, you highlight that the ECO5 route where it runs adjacent to the Lincolnshire AONB would cause significant impact and damage to the views of and from the AONB (however in your Grimsby to Walpole document circulated you have managed to omit this).

Clearly your study and conclusions are fundamentally flawed as it is blatantly obvious that there are massive socio economic impact with an onshore, and overhead routing option, whereas significantly much less with an offshore route. This is backed up by your proposed EGL3 &4 undersea cable proposal (otherwise you would be running these proposed links overground from Scotland to England)

Therefore:

> **The adoption of an undersea cable routing would be consistent with previous Grid upgrade plans**

---

2. **The framing of the route decision based solely on the OCS5 line costs, and not factoring in the total project costs of connecting all the energy sources to the connection points, has missed significant additional costs associated with your proposal. Consideration of total project costs invalidate the selection of your current proposal.**

Due to your narrow cost based, selection of ECO5 in isolation of considering the wider Grid upgrade in the area, this has led you to position the grid connection points (LCP 1 and LCP 2) on the proposed line of ECO5.

Your current proposals identify the needs for these two new connection point due to the need to connect the following power sources into these connection points.

Race Bank Off Shore Wind (OSW)	565Mw
Outer Dowsing OSW	1500Mw
Aminth Energy Interconnector	1400Mw
SENCA Interconnector	1200Mw
EGL 3	2000Mw

EGL 4	2000Mw
Offshore HVDC OSW link	1800Mw
Mablethorpe Storage	1500Mw
Mablethorpe Green / Solar	1025Mw

The first 7 of these power sources are coming in from the sea, the last 2 though the exact location has not been confirmed but are clearly close to the Mablethorpe area.

These two connection points are some 5.5 – 6 miles inland from the coast and each of these power sources would require cables running inland to these connection point. Having the two connection points in this location therefore adds 50- 55 miles(80Km) of **additional cabling into the overall costs**.

Based upon National Grids own figures for the lifetime costs (capital and running) of 1KM of underground cabling of approx. £45.3m / Km the positioning of these two connection points adds an additional £2270 – £2497m into the **overall project costs.** Clearly a connection point on the coast line would reduce this additional cost. Thus, making the off shore option very comparable even on National Grids published figures.

Conversely National Grid may claim they wish to run **9 additional overhead cable runs** to the connection points. This would decimate the countryside around Alford and make the area virtually unliveable and this cannot be an acceptable option.

In addition to the above points, it will result in the permanent destruction of Grade 1 arable farming land, by the siting of these two LCPs when food security is an increasing issue.

It is clearly stated in your strategic option report that the area chosen for siting of LCPs are in unspoilt very rural area, screening would be difficult and the visual impact from the AONB would be significant (again omitted from your Grimsby to Walpole documentation).

On the coast there is an existing brown field site of sufficient size to accommodate 1 or 2 LCPs, and this land is owned by National Grid – Theddlethorpe Gas Terminal (close to Mablethorpe). This site due to its previous use is also relatively well shielded and the LCP would have a significantly less visual impact and totally preserve the AONB impact.

Flood risk can be addressed by localise flood defences, or by building the LCP on a raised platform.

Therefore:

> **These overall project costs should be factored into any decision on routing as the current documents only consider part of the upgrade costs required thus coming to a partial, incorrect and more expensive solution.**
>
> **The use of the Theddlethorpe Gas Terminal should be considered**

Selection of this location for the LCPs would remove:

- **The additional costs of cabling from the coast or Mablethorpe area**
- **Additional costs of purchase of the agricultural land**
- **The socio economic impacts on the area**
- **Lower the costs for the OSW and Interconnector projects which need to be factored into the overall project cost of "Grid Upgrade"**

---

3. **Significant issues that were highlighted in your Strategic Options Report have been ignored, plus addition local factors that would drive increased costs, have not been factored into your decision**

- In the strategic options report, you state that the ECO5 proposal would have significant and long-term impact on the AONB in the area where the overhead cables are running adjacent to the AONB (plan areas 4,5, 6 and both the LCPs).
- You have clearly stated that your routing selection in area 5 has been done to avoid the area of North Reston Airfield, thus moving it away from this location. However, this "airfield" is private and has a single plane hangered there. You have however routed the overhead pylons fairly adjacent to Strubby Airfield (of which you make no mention) (section 5). This airfield has numerous light planes and is in frequent use, the pylon route and the positioning of the adjacent LCS would in effect preclude safe use of Strubby Airfield. This airfield has been used to station an additional medical helicopter (HEMS) during the busy summer period due to it being the only local Airfield.
- The River Great Eau (section 4/5) has numerous wildlife site and the west side of the river is a flood overflow plain, which is usually flooded these days between October and March. This River Eau valley is thus home to migrating wildlife utilising these flood areas, often arriving in darkness. Low flying Swans, Geese, White and Grey Herons navigating along the course of the Great Eau would be endangered by the positioning of overhead cable runs.

  All the above points clearly indicate that for sections 4,5 and 6 an underground positioning of the cables would be necessary. This 30 mile section (at a minimum) would, using the costs from National Grid, come at a cost of £1236m (table D.12 Strategic Options Report)

Therefore:

> **It is clear that the eventual costs of this option of overhead cables would need modification which would incur additional costs on top of what is proposed. Clearly there are other areas of the proposed route which are likely to require similar additional modifications at additional cost. These additional costs have not been considered in your route selection and thus invalidate the current proposals relative merits compared to an off shore option.**

Summary

1. The choice of an overhead route for Grimsby to Walpole is inconsistent with other Grid Upgrade decisions, and the socio economic comparison of onshore vs off shore are flawed.
2. The methodology used to only consider the cheapest route for power cables to cross the G8 and G9 boundaries in isolation of other costs associated, has led to an invalid choice of ECO5 as being the correct solution.
3. Additional costs once factored into the project costs (on top of those highlighted in section 2), further undermine the case for ECO5 in comparison to other options.

Costs are: £1998m
£2350m ave estimate of connection cost to inland LCS
£1235m additional underground cabling requirement (minimum)

This results in a total cost of around £5583m, compared to your ECSS2 (offshore) estimate of £4807m

PROPOSED ALTERNATIVE ROUTING SOLUTION

1. **The off shore option ECSS2 should be taken**
2. **The Grid connection points should be positioned on the Brownfield Theddlethorpe Gas terminal (which NG own)**
3. **Offshore Grid Connection points could also be considered, as these are preferred by other European Grid projects.**

Rationale:

1. **The outlined alternative proposal cost is lower or at worse similar to your ECO5 overhead proposal costs when TOTAL area grid upgrade costs are considered fully.**
2. **Removes loss of agricultural land.**
3. **Removed impacts on visual amenity loss alongside the AONB.**
4. **In addition, it significantly reduces the socio economic impact on the countryside and the Lincolnshire population.**

For the reasons above the Parish Council is left with no option but to **formally object** to the proposals as currently presented. Further work should be done by NGETS, taking the above points into consideration and utilising the **TOTAL** Grid Upgrade costs and socio economic impacts and not using partial costings.

Yours Faithfully
Cllr S Acklam
Chair, Withern with Stain Parish Council