



VICTORIA ATKINS MP
Member of Parliament for Louth and Horncastle

Mr Ben Muncey
Project Director
Electricity Transmission/New Infrastructure
National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

12 March 2024

Dear Mr Muncey,


National Grid Electricity Transmission – Non-Statutory Consultation on Grimsby to Walpole proposal

I am writing in my capacity as the Member of Parliament for Louth & Horncastle, in response to National Grid's proposal of installing pylons in my constituency, between the Lincolnshire Wolds Area of Outstanding Natural Beauty and Lincolnshire East Coast, and two substations near the market town of Alford.

I wish to register my formal objection to the proposal. The current proposal does not include a genuine choice of an offshore option. Many constituents have indicated to me that they consider this to be wholly inadequate. The failure to provide local communities with a meaningful choice on the 'top level' question – overland, underground, or offshore in any consultation renders this consultation deficient.

It is clear from correspondence that I have received from constituents, local authorities, and the agricultural sector, all of whom will be significantly affected by the installation of traditional 'overland' pylons and the substations, that there is overwhelming support for an offshore option. I strongly agree.

National Grid seeks to persuade local residents that an offshore alternative is not possible. No evidence has been produced to support this claim. It is already the case that undersea cabling has been approved and funding provided for projects elsewhere in the UK, most notably between Scotland and the North of England. ESO also agreed for an independent review to be conducted in East Anglia into offshore alternatives.



National Grid has shifted its position during this consultation. My office staff attended a meeting this morning (12 March 2024) at which representatives of National Grid outlined proposals for an offshore grid from Scotland to London for development from 2030. This is in addition to the proposals for pylons between Grimsby and Walpole. This claim directly undermines the claims that an offshore option is too expensive or not appropriate.

I have written to you today demanding that the consultation deadline be moved back so that these proposals can be considered and commented upon by my constituents as part of the Grimsby to Walpole consultation. This is a significant change in National Grid's public position and should be included in the consultation process.

I have conducted a local survey that received responses in just 18 days from more than 1500 residents in Greater Lincolnshire. This survey concluded that over 92% of participants do not believe that an offshore route has been meaningfully addressed in your consultation. 97% of participants also support calls for an independent review into an offshore alternative like the ESO have agreed for East Anglia. Lincolnshire should be treated fairly and given the same opportunity to provide a fully informed view on the Grimsby to Walpole line. I am, therefore, calling for an independent review into offshore alternatives to be conducted as a matter of urgency, in addition to the delaying of the deadline.

It is my view that the public should be able to express their views on all the strategic options for the Grimsby to Walpole line. At present, however, the public is being limited to only providing feedback on pylons going through our beautiful countryside.

The importance of reinforcing our electricity grid to cope with demand is recognised by us all. It is critical, however, that consideration of new infrastructure is calculated so that the consultation meets the legal requirements expected by government and the public.

I have made numerous requests for details of the evidence which has been evaluated with regards to underground cabling and an offshore grid. The limited detail provided stated "the estimated capital cost of an onshore underground alternative, including substations, using alternating current technology, would be approximately £6.5 billion (£6,544 million). The estimated capital cost of an offshore alternative, including substations, would be approximately £4.4 billion (£4,391.7 million). The cost of those alternatives is significantly greater than the equivalent cost of the onshore option that we are developing, which is around £1 billion (£1,074 million)."

Detailed explanations of these costings have not been provided. It is not clear whether these costings include the compensation required for the loss of tourism (East Lindsey's tourism industry is worth £824m) and use of land and property prices. There is also no evidence that the same approach has been taken for each option, for example does the onshore option include the costings for the connection infrastructure of prospective energy projects which the subsea options is understood to include? Any inequality in factors considered during the



decision-making process leave National Grid open to litigation. The loss of high-quality agricultural land to farmers and the wider economy must be factored in.

In the response I received on 21 February 2024, it was argued that to consult on either a fully underground and/or an offshore option would be “disingenuous” to local communities, as these do not meet your licence obligations and the framework set by government. This no longer stands in light of your 2030 proposals.

On the current Grimsby to Walpole proposal, please explain why it is considered to be cost effective for a 500km subsea cable to be used from Aberdeenshire to the Lincolnshire coast, but it is not possible to extend this route via a subsea option for a further 200km to be brought onshore at Tilbury?

The 140km overhead line from Grimsby to Walpole runs the entire length of Lincolnshire. The landscape would be marred by an estimated three 50m pylons per kilometre. My constituents are particularly concerned about the proximity of the pylons to the Area of Outstanding Natural Beauty of the Wolds, as well as the dominance such structures would have over the skylines of Louth, St James’ spire, and the undeveloped coastline.

There are numerous planning decisions by Planning Inspectors that signify that tall vertical structures in flat open landscape cannot be justified due to the scale of impact on the landscape over a very wide area. Yet your proposal accepts that “there is potential for long-term effects on views from the AONB from both the overhead line and substation infrastructure at the Lincolnshire Connection substation(s).” The geography of the Fens makes successful mitigation of overhead lines on our landscape impossible.

The proposal includes the building of two substations south-west of Mablethorpe and north-east of Alford to facilitate the connection of planned offshore wind generation, interconnectors with other countries and a subsea link from Scotland. It is estimated that these substations will be around 120 hectares.

In my letter dated 8th February 2024, I raised my shared concern with local councillors and constituents on the planned new Lincolnshire Connection substations (LCS). I requested information on what is being done to mitigate the effect of these substations on our community. The response received on 21 February 2024 failed to address this.

The Corridor Preliminary Routeing and Siting Study outlines two main types of substations. An AIS substation (currently the preferred option for LCS) requires a large area of land and is “not recommended for certain environments such as coastal areas”. A GIS substation which tend to use less space but “typically require the use of sulphur hexafluoride (SF₆) – a greenhouse gas that has a global warming impact 22,800 times that of carbon dioxide.” Given the proposed locations for the substations beside our coastline both suggestions present serious concerns and challenges for the local coastal community which have not been addressed in the proposal.



Moreover, the question remains whether any mitigation and screening can be effective in an untouched landscape that currently exists in the area of search. It is especially concerning that three substations may be visible from the AONB. Everything possible should be done to try and mitigate against the wanton destruction of these views and our local environment.

Residents also demand explanations and assurances regarding the additional energy projects that you propose will link to the new Lincolnshire Connection substations. What will this mean for local communities?

The Project Background Document outlines several proposed projects with connection years ranging from 2030-2034. As I have raised previously, the communities of Anderby Creek, Mablethorpe, Alford and surrounding areas have already had to experience significant disruption from projects such as Triton Knoll and Viking Link. Further piecemeal connections on land will only continue untold disruption to small unindustrialised communities who do not have the infrastructure and road network to facilitate numerous large developments.

I endorse Lincolnshire County Council's call for a masterplan of the substation areas: to consider not only the Lincolnshire Connection substations but also the other substations from other energy companies that will be necessary. This will enable constituents to be able to consider plans holistically rather than the piecemeal approach we have had to date as developers bring their proposals forward in the future.

I have made representations consistently for the need for a more coordinated strategic plan connecting new projects to the network. Your answer to this is that the new substations will be "closer to the coast than our existing 400 kV network, and therefore will prevent additional impacts of new generation seeking to connect further inland at substations such as Bicker Fen, thereby reducing the overall impact." This fails to address or even acknowledge the impact it will have on the communities around Alford and our Lincolnshire coast. It feels for many like industrialisation of our countryside through the backdoor.

At a time, the Prime Minister has prioritised food security, these proposals contradict these policy intentions in a county that is the breadbasket of the nation. 73% of land area of the county is farmed and £1.3billion is generated for the economy by our farming sector. In correspondence and meetings with local NFU members, serious concerns have been raised about the impact of the Grimsby to Walpole line on food security. Consideration of the impact caused by the line and substations on food production does not seem to have been measured. We know that farmers on other parts of the route fear losing use of their fields for 3 years or longer.



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

In conclusion, the view that an ambitious, bold, and rapid push towards a modern coordinated offshore grid to future proof our network, provide businesses more confidence, cut years of delays to projects whilst protecting communities and environments is powerful and needs to be explored. Apparently, National Grid agrees in light of the proposals that have come to light today.

On behalf of my constituents, I object to your proposal for 140km of overhead lines being treated as the default option for Lincolnshire. We deserve to be able to have a meaningful choice on overland, underground or offshore options. We should be given an independent review into offshore options for Lincolnshire's east coast. I would be grateful if this could be considered, recognising the strength of support there is for this to be conducted.

I would be pleased to meet with you to discuss launching an independent review. To arrange a meeting please contact my office by emailing victoria@victoriaatkins.org.uk.

Yours sincerely,

The Rt Hon Victoria Atkins MP
Member of Parliament for Louth & Horncastle