



Guildhall  
Marshall's Yard  
Gainsborough  
Lincolnshire DN21 2NA  
Telephone 01427 676676  
Web [www.west-lindsey.gov.uk](http://www.west-lindsey.gov.uk)

Your contact for this matter is:  
Dan Galpin

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

12<sup>th</sup> September 2023

Dear Sir/Madam,

**APPLICATION REFERENCE NO: 147270**

**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 – EN020034**

**LOCATION: North Humber to High Marnham**

Thank you for your letter dated 21<sup>st</sup> August 2023. This letter forms the response from West Lindsey District Council in its role as the Local Planning Authority. This letter will set out the response of the Local Planning Authority to the EIA Scoping Report which has been submitted. The proposal constitutes both EIA development for the purposes of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and a Nationally Significant Infrastructure Project (NSIP) and is regulated by The Planning Act 2008. This letter will set out the response from the Local Planning Authority based on the chapters in the Scoping Report. The project is entirely outside of the geographic boundary of West Lindsey by up to 3.5 kilometres. Therefore, where the Local Planning Authority has no comments to make, this will be indicated.

#### Chapter 1 – Introduction

There are no comments to make on this section. The introduction sets out the background context and the legislative framework which the proposed development would sit within.

#### Chapter 2 – Regulatory and Planning Policy Context

The national legislative and policy context is generally agreed upon. It is noted that the EIA Scoping Opinion does not reference the most recent iteration of the National Planning Policy Framework (NPPF) (September 2023). This is mostly an administrative requirement as the new NPPF only makes minor alterations to the requirements for renewable energy development (most notably wind) but given the nature of this proposal in supporting the transition to a net zero economy, consideration of the most up to date legislation, policy and guidance is critical especially given the scale of the NSIP. The Scoping Report also completely fails to reference the Energy Security Strategy published in April 2022.

Although again, the relevance is limited, a full understanding of the legislative, policy and guidance is critical.

It is considered that the local policy context is severely lacking in detail. No consideration has been provided to the Central Lincolnshire Local Plan (adopted April 2023) at the outset and is only referenced sporadically throughout the Scoping Report and where it is mentioned, detail is lacking. Although not within the geographic area of West Lindsey, the nature and scale of the proposed development has the potential to have significant environmental effects of a transboundary nature. This is especially the case for impacts from a landscape, visual and heritage perspective. The flat topography and scale of the project means that it has the potential to be visible for several miles and therefore into jurisdiction of the West Lindsey

The whole Scoping Report makes two references to Neighbourhood Plans and no specific reference is made to any Neighbourhood Plan in any District/County, let alone specific policy within them. Neighbourhood Plans form part of the statutory development plan within their relevant geographic boundaries and therefore an appropriate level of weight should be afforded to them in the determining of this proposal. A lack of reference to specific policies is consistent throughout the Scoping Report.

### Chapter 3 – Main Alternatives Considered

The approach here is agreed, it is positive to see that an outline of the alternatives considered has been provided at an early stage which is not always the case. It would be expected that a full justification is also set out within the final Environmental Statement (ES).

### Chapter 4 & 5 – Description of the Project / EIA Approach & Methodology

The general approach to the overall project is considered to generally be acceptable. More clarity on the nature (if any) public consultation will take place would have been preferred. This project and the NSIP process in general are highly technical and interdisciplinary but the scale of the project and the rural context will likely raise questions and/or concerns within many communities who would want to be involved at an early stage. A lot of reference is made to cumulative impacts but it would have been preferable to see this in a standalone chapter.

### Chapters 6 & 7 – Landscape & Visual

The scale of this project is very substantial and visual/landscape impacts given the flat topography could potentially impact the landscape character for miles around. Consideration should be given to Policy S53 which relates to design and amenity. It is positive to see that reference has been made to Policy S62. The lack of reference to any National Character Areas within West Lindsey is also of concern. For instance, National Character Area 22 around East Stockwith and Wildsworth comes within 1.5 kilometres of the Scoping Boundary and has been afforded no consideration. No reference appears to have been made to Section 12 of the NPPF relating to design.

More details should be provided with regard to the potential impact of the proposal on West Lindsey. At present, only one reference is made to scoping Areas of Great Landscape Value around Gainsborough. Whilst this is understood as these are predominantly on the eastern side of Gainsborough, more justification should be provided.

The approach to the LVIA not referencing National Character Areas (NCAs) and favouring Local Character Areas (LCA) is understood but the purpose of National Character Areas is to provide an overall picture of the character and appearance of an area at a larger scale. Given the nature and scale of the project, the lack of specific consideration to NCAs is concerning and it is the view of the Local Planning Authority that these should be **scoped in** to the final ES. The LVIA should also **scope in** the potential impacts (if any) on LCAs within West Lindsey. It is agreed that the Lincolnshire Wolds can be scoped out.

It is understood that the main focus would be on local/nationally protected landscapes but this should not be at the expense of the overall landscape character. The fact that Chapter 7 makes almost no reference to West Lindsey and no detailed consideration is surprising. The closest extent of the Scoping Boundary is just over 1 kilometre and goes up to being 3 kilometres from the western border of West Lindsey. The introduction to Chapter 7 outlines the following:

*'Based on the type of OHL infrastructure and experience of assessments of 400 kV OHL (the tallest element of the Project), the visibility of individual pylons approximately 50 m tall is assumed to be a maximum distance of 10 km. Beyond this distance the perceptibility of pylons approximately 50 m tall diminishes considerably in most instances, and in all but the clearest of viewing conditions.'*

*'At distances greater than 5 km, effects on landscape character and visual amenity are unlikely to be significant. This is because at 5 km distance, when viewed at arm's length, a 50 m tall pylon will appear to be approximately 0.61 cm high in the landscape. If a pylon is seen on the skyline in very clear conditions, or a pair of pylons are seen close together at this distance, perceptibility may increase slightly but this is still unlikely to trigger significant effects.'*

*'Initial field survey for the Project has also determined that, where visible at distances between 1 km and 3 km, existing pylons are typically noticeable but not prominent. This is because in the rolling well-treed landscapes found north of the Humber Estuary, pylons are often obscured by trees, landform and vegetation, whilst in the flat open landscapes south of the Humber Estuary, the visually permeable nature of the pylon's lattice structure means that they rapidly recede and visually assimilate into the wider landscape.'*

The text is taken from 7.3.2 to 7.3.4. Whilst the impacts are less likely to be significant on West Lindsey than other LPAs directly within the Scoping Boundary, the lack of any consideration is concerning. The first paragraph makes it clear that the study area is up to 10 kilometres and it is only at a distance of greater than 5 kilometres where the impacts are considered to be *'unlikely to be significant'*.

All relevant NCAs/LCAs within West Lindsey should be **scoped in** to the ES alongside consideration of all relevant development plan policies, including Neighbourhood Plans. This alongside Chapter 9 are the most important considerations to the Local Planning Authority and should be given an appropriate level of consideration.

## Chapter 8 – Ecology & Biodiversity

There are no specific comments in this regard. There may important considerations during the construction period but beyond this, given the physical separation distance between

the project and West Lindsey, significant environmental effects seem unlikely at a distance of beyond 1 kilometre.

#### Chapter 9 – Heritage

No reference has been made to Policy S57 of the Central Lincolnshire Local Plan. Although the impact on the setting of any designated/non-designated heritage assets within the District is less likely, the Local Planning Authority would at a minimum expect a proportionate assessment of the impact on their setting and significance to be undertaken. There are a number of Grade II Listed Buildings in Torksey, Gainsborough, Wildsworth and East Stockwith, all of which are near the River Trent and should be considered as part of the EIA. Again, a proportionate assessment on their setting and significance would be expected given the significant scale of the project and the potential to introduce a prominent feature on the landscape for at least 80 years. The scale of the project would be the equivalent to a building 10-20 storeys in height. .

#### Chapters 10, 11 & 12 – Water Environment / Geology and Hydrogeology / Agriculture and Soils

Given the separation distance of the project from West Lindsey, there are no comments to make in this regard.

#### Chapter 13 – Traffic and Transport

The general approach to measuring risk is generally agreed with. The approach to selecting which development plans/policies to assess is again somewhat confusing. No reference has been made to the Central Lincolnshire Local Plan. The idea that a decline in highway safety has been **scoped out** given the scale of the project is concerning. The ES should also include details of construction traffic intensity and routing as this could have the potential to cause serious localised issues. The relevant development plan policy in the Central Lincolnshire Local Plan is Policy S47. Although this would only be applicable if construction traffic is to be routed through Central Lincolnshire.

#### Chapter 14 – Air Quality

It is anticipated that the main impacts would be during the construction period. Full consideration should be given in the ES to any transboundary impacts that result from transport emissions, ground works/disturbance or anything that causes the release of dust and particulate matter into the air. No reference is made to the potential impact (should one exist) on West Lindsey and no policies have been referenced. Transboundary effects should be **scoped in** to the final ES.

#### Chapters 15, 16 & 17 – Noise and Vibration / Socio-economics, Recreation and Tourism / Health and Wellbeing

There are generally no comments in this regard. Tourism is a significant element of the economy within West Lindsey contributing over £143 million in 2019. However, apart from the potential exception of the construction period, significant impacts in this regard seem unlikely.

#### Chapters 18 & 19 – Climate Change / Major Accidents & Hazards

The approach in these chapters is generally agreed. The fact that more consideration has not been given to potential hazards and accidents during the construction period at this stage is somewhat concerning.

### Conclusion

This letter forms the basis of the response of the West Lindsey District Council in its role as the Local Planning Authority to the Scoping Report to the aforementioned NSIP proposal for the development of a 400 kilovolt electricity transmission cable from North Humber to High Marnham.

Should you have any questions or queries about the contents of this letter, please do not hesitate to contact myself.

Yours faithfully,

Dan Galpin

Senior Development Management Officer  
On behalf of West Lindsey District Council

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