

22nd June 2017

Gemma Clark
Programme Officer,
c/o Planning Policy Team,
East Lindsey District Council,
Teddard Hall,
Manby Park,
Manby,
Louth,
Lincolnshire
LN11 8UP

Dear Gemma Clark,

Re: Emerging East Lindsey Core Strategy Local Plan Document hearing statement representation

National Grid Viking Link (NGVL), together with its development partner Energinet, are proposing to develop an electricity interconnector between Great Britain and Denmark. The project is known as Viking Link and will enable Great Britain to trade energy as a commodity with European Energy Market.

Viking Link will consist of approximately 760km of Onshore and Offshore cables connecting Great Britain's and Denmark's electricity networks. The cables carry High Voltage Direct Current (HVDC) and will have capacity equivalent to 1.3% of Great Britain's current usage.

Permission for the Onshore Scheme, from Mean Low Water Springs (MLWS) at the landfall point at the Lincolnshire Coast to Bicker Fen substation, will be sought under the Town and Country Act 1990 (the 1990 Act).

NGVL announced in December 2016 their preferred cable route corridor for the underground cables, known as the Purple Route Corridor, which includes land within East Lindsey District Council. The underground DC cables would route through the Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB) in this preferred route corridor.

As required by the 1990 Act, the development will need to have regard to both adopted and emerging national and local planning policy and other material considerations, including the emerging East Lindsey District Council Core Strategy and Settlement Proposals (Publication Version 2016).

NGVL have previously submitted written representations to East Lindsey District Council in relation to specific policies proposed for inclusion in the emerging East Lindsey District Council Core Strategy and Settlement Proposals (Publication Version 2016). NGVL wanted to ensure that infrastructure necessary for energy development is included within these policies.

Matter 19: Renewable and low carbon energy (SP27)

Question 2: Is propose amendment ADM39 necessary to make the plan sound?

NGVL would like to take this opportunity to reiterate the importance of making the proposed amendment (ADM39) as NGVL believes without this amendment, the policy is unsound due to the supporting text to Policy SP27 being contradictory.

Paragraph 3 states *“any development in the AONB, or which impacts upon it, or its setting, is carefully considered for its impact on the character of the landscape. Where those impacts are judged to be so significant that they outweigh the benefits, proposals will be rejected. The Council will support local communities and businesses in pursuing sources of low carbon energy generation. However, within the Lincolnshire Wolds where following assessment the benefits are outweighed by the impact of the development that support will not be forthcoming. It is considered that any significant commercial energy infrastructure is likely to create an unacceptable impact within the Wolds.”* (Underlined text our emphasis)

NGVL supports the notion that the policy and majority of the supporting text are consistent with the National Planning Policy Framework (NPPF) – that there is a presumption against development in the AONB unless certain tests are met and that this is the same for all infrastructure which will have an impact on the AONB. However, the final sentence of the supporting text (underlined above) singles out a particular type of infrastructure and sets out an assumption that the impact will be unacceptable. NGVL considers this sentence is unnecessary as ELDC have already detailed that there is a presumption against permission being granted unless there are exceptional circumstances and the tests are met. NGVL consider all development should be subject to the same tests and there should be no such element of predetermination against specified schemes.

The Lincolnshire Wolds Management Plan (2013-2018) states *“Planning pressures remain, including the possibility for future infrastructure schemes, both within or in close proximity to the AONB, for electricity, gas and water distribution. Future proposals will need to be assessed on a case by case basis by the relevant Local Planning Authority”*. This accords with policy SP27 assessing each development on a case by case basis rather than have a presumption against a specific type of development.

NGVL consider removing the text, as struck through below, would result in the document being sound and compliant with NPPF. Policy SP27, page.112, supporting text paragraph 3;
“Any development in the AONB, or which impacts upon it, or its setting, is carefully considered for its impact on the character of the landscape. Where those impacts are judged to be so significant that they outweigh the benefits, proposals will be rejected. The Council will support local communities and businesses in pursuing sources of low carbon energy generation. However, within the Lincolnshire Wolds where following assessment the benefits are outweighed by the impact of the development that support will not be forthcoming. ~~It is considered that any significant commercial energy infrastructure is likely to create an unacceptable impact within the Wolds.~~”

NGVL supports the current content of the Core Strategy submitted by East Lindsey District Council to the Inspectorate. This support is provided on the understanding that the changes NGVL have suggested are adopted in the final version of the Core Strategy and that there will be no further changes to be made. NGVL reserves the right to review any further revisions of the Core Strategy and to make comment or submit further representations on any changes proposed as a result of the hearings on 12th to 14th July, 8th to 10th August, 15th and 16th August 2017. NGVL no longer feel the need to attend the hearings as previously requested. We would ask that this written representation be taken in to consideration and carry the same weight as if it were being made orally at the hearing sessions.

NGVL look forward to continuing to work with the local authorities to deliver this important infrastructure project. NGVL would also like to take this opportunity to ask to remain informed on the progression of the East Lindsey Core Strategy and Settlement Proposals (2016).

Further information regarding the proposed scheme and the next steps can be found at <http://www.viking-link.com>.

Yours faithfully,

Liz Wells

Consents Manager

National Grid

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