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**Viking Link: UK Onshore Scheme  
Planning Appeal  
Core Document Reference 10.5  
South Holland District Council Planning  
Officers Report**



## SOUTH HOLLAND DISTRICT COUNCIL

**Report of:** Development Manager

**To:** Planning Committee - 7 February 2018

**(Author:** Richard Fidler - Development Manager)

**Purpose:** To consider Planning Application H04-0823-17

**Application Number:** H04-0823-17

**Date Received:** 30 August 2017

**Application Type:** FULL

**Description:** Installation of high voltage Direct Current cables for the Viking Link interconnector project between proposed landfall at Boygrift in East Lindsey to a proposed converter station at North Ing Drove; installation of Alternative Current cables from the converter station to the existing Bicker Fen 400 kV Substation; as well as permanent access road to converter station, temporary facilities required during construction such as compounds and works areas

**Location:** Ing Drove Donington

**Applicant:** National Grid Viking Link Ltd

**Agent:** National Grid Viking Link Ltd

**Ward:** Donington, Quadring and Gosberton

**Ward Councillors:** Cllr R Clark  
Cllr C N Johnson  
Cllr J L King

You can view this application on the Council's web site at

<http://planning.sholland.gov.uk/OcellaWeb/planningDetails?reference=H04-0823-17>

### **1.0 REASON FOR COMMITTEE CONSIDERATION**

1.1 Significant development which merits Committee consideration.

### **2.0 PROPOSAL**

2.1 Viking Link is a proposed 1,400 megawatt (MW) high voltage Direct Current (DC) electricity link between the British and Danish electricity transmission networks. It comprises approximately 762 km of onshore and submarine high voltage DC electricity transmission cables between new converter stations which are in turn connected to the high voltage electricity networks at existing substations at Revsing, Jutland in Denmark and at Bicker Fen. Viking Link will enable Great Britain and Denmark to trade energy as a commodity within the European Energy Market.

2.2 Four planning applications have been submitted to East Lindsey DC, Boston BC, North Kesteven DC and South Holland DC for permission to develop the UK onshore components of Viking Link. The South Holland application is for the proposed converter station, 2.8 km long permanent access road, approximately 0.98 km of proposed DC cable route, approximately 1.21 km of proposed AC cable route, and all associated temporary works.

2.3 The overall scheme comprises approximately 67.16 km of underground high voltage DC cable from the proposed landfall at Boygrift to the proposed converter station at North Ing Drove, and approximately 2.34 km of underground high voltage Alternating Current (AC) cable from the converter station to the existing Bicker Fen 400 kilovolt (kV) Substation as well as a 2.8 km

permanent access road from the converter station to the A52.

- 2.4 An Environmental Statement accompanies the planning applications and reports the results of an Environmental Impact Assessment of the scheme. Supplementary Environmental Information relating to ecological, archaeological and arboricultural survey work was submitted in November together with an extension of the red line boundary to incorporate the land drainage works required to ensure that the land at both sides of the access road can be drained and, in the future, the access road can remain open should the landowners' choose to undertake drainage works. This additional land has been subject to ecological survey.
- 2.5 The proposed converter station site including associated mitigation and land required for construction would occupy a field 30 ha in size. It would comprise a range of specialist equipment some of which must be located within buildings as well as some which can be located outdoors. The height of the buildings which are required takes into account the height of equipment contained within them as well as safety clearances needed to construct and maintain the equipment. As converter stations are complex operational systems which necessitate significant detailed design work on a site by site basis; the detailed design of the proposed converter station will need to be undertaken by a specialist contractor. Thus for the purposes of the application a Design Code has been submitted to guide the design of the proposed converter station building and outdoor electrical equipment zone (Rochdale Envelope). This approach seeks to establish the comprehensive base design within which the contractor's detailed design will comply and would be the subject of planning conditions.
- 2.6 The key components of the proposed converter station are set out below:
- DC switch hall
- This contains the termination of the DC onshore underground cables together with high voltage DC switchgear to connect these to the power electronics. This equipment can be enclosed in a building up to 24 m high or located outdoors.
- Valve hall and AC reactor (ancillary equipment)
- This contains high voltage power electronics equipment that converts electricity from DC to AC and vice-versa. This is located indoors in buildings up to 24 m high. It also contains specialist equipment to control the environmental conditions within the building.
- Control building
- This contains control panels and associated operator stations for operating the converter station as well as protection and communication equipment. Offices, welfare facilities and other auxiliary systems are also located within the control building. This will be approximately 15 m high.
- Cooling fans
- This comprises external fan units located outside of the Valve Halls. The fans are used to cool down the valves. Power electronic valves are water cooled. Coolant is pumped through the fan units.
- Transformers
- These are normally located outdoors and change the AC voltage electricity between the voltage needed for transmission via the AC transmission systems (the NETS) and the voltage needed to connect to the power electronic equipment for conversion from AC to DC within the Valve Halls. The transformers are separated by firewalls. Typical dimensions are 15 m long by 15 m wide by 16 m high.
- AC switchyard
- This connects the proposed converter station to the NETS. It includes a range of electrical equipment which is located outdoors including harmonic filtration and reactive power compensation equipment, circuit breakers, transformers, busbars, insulators and subject to detailed design shunt reactors. This could be located within a building, however, this is subject to detailed design.

-Diesel back-up Generator

This would be used in the event of a failure of the low voltage electricity supply provided by the Distribution Network Operator (DNO).

-Spare parts building

This building houses spare parts and components. Adjacent hardstanding areas provide storage for a spare transformer and spare cable drums.

2.7 In terms of the proposed layout of the converter station, it would comprise four main zones: building and electrical equipment, perimeter road, hardstanding and security zones. Outside these zones, the proposed site comprises ancillary zones including landscape planting, attenuation, hardstanding and the reinstated zones. The following sets out maximum area of the zones required to accommodate a converter station and could reduce following the detailed design following appointment of a contractor.

-Building and outdoor electrical equipment zone

This comprises two areas which have been defined on the maximum heights of the building(s) and/or outdoor electrical equipment which could be constructed within them.

-Sub-zone A to the north of the converter station zone containing buildings up to 16 m tall and/or outdoor electrical equipment up to 24 m tall. This would include components such as the transformers and AC switchyard.

-Sub-zone B to the south of the converter station zone containing buildings and/or outdoor electrical equipment up to 24 m tall. This would include components such as the DC switch hall, valve halls and AC reactor.

Maximum area 48,000 sqm.

-Perimeter road zone

This comprises a permanent perimeter road which would form a continuous circuit around the converter station to facilitate access. It has been defined taking into account the largest vehicles which will require access to the site as well as appropriate clearances.

Maximum area 17,200 sqm.

-Security zone

This comprises a 8 m wide 'buffer' zone within which security fencing would be erected . This provides clearance between the perimeter road and landscape zones. It would include security fencing up to 3.5 m tall and incorporate security gates for pedestrian and vehicle access/egress to/from the site. CCTV cameras will also be installed at regular intervals

Maximum area 8,500 sqm.

-Additional hardstanding zone

This comprises an area for permanent car parking for up to 20 vehicles as well as an area of hardstanding to provide a permanent laydown area for the storage of equipment and plant as well as providing an area to be used for siting of temporary offices and welfare facilities in the event of future maintenance activities. Part of the hardstanding will be within the security zone and the remainder will be situated outside of the security fence.

Maximum area 14,200 sqm.

-Reinstated zone

This comprises all areas within the site which are not required for permanent development. The reinstated zone lies to the east of the converter station and could potentially be returned to agricultural use. The reinstated areas to the north and south of the converter station would be seeded but would not be returned to agricultural use.

Maximum area 84,600 sqm.

#### -Attenuation zone

This comprises an area of the site which would be used to establish an attenuation pond as part of the permanent drainage scheme. The pond(s) have been sized based on estimated runoff rates from the developed areas to establish the maximum area required.

Maximum area 10.900 sqm.

#### -Landscape planting zone

This comprises a variable 30-40 m wide 'buffer' zone which follows the perimeter of the converter station site. Within this zone a combination of earthworks and landscape planting would provide permanent landscape screening.

Maximum area 89,600sqm.

- 2.8 With regard to the other aspects of the South Holland application, the access to the proposed converter station would be by a new 2.8 km long permanent access road from the A52. This road would include a new junction with the A52, a new bridge crossing of the Hammond Beck, culvert crossings of other drains and a new junction with North Ing Drove. It would be up to 6 m wide enabling two-way traffic flows as well as movements of HGVs and Abnormal Indivisible Loads (AILs). Initially it was proposed that a wooden post and rail fence would be installed to both sides of the road with field gates at a number of locations to provide access to landowners using adjacent fields for agriculture. The applicant is in discussion with the landowner regarding the requirement to install fencing along both sides of the permanent access road. The proposal may be altered to remove the fencing. Secured field gates would be installed in the security zone and would also be installed immediately off the A52 and at North Ing Drove in order to prevent unauthorised use of the road. A permanent security gate would be installed in the security zone where the access road approaches the proposed converter station.
- 2.9 The proposed underground AC cable route would be approximately 2.34 km long. The route exits the proposed converter station site at its eastern boundary and terminates at the Bicker Fen 400 kV Substation at its eastern boundary. The proposed AC cable route splits into two with one section proposed to connect to switch bays in the south and the second section to the north of the connection point. Approximately 1.21 km of the proposed AC cable route lies within South Holland with the remainder within Boston.
- 2.10 The proposed AC cable route is defined by a 150 m wide corridor within which the 50 m working width for AC cable installation will be established. The working width required for the AC cable installation will comprise:
- Two trenches within which AC and fibre optic cables will be installed.
  - Temporary access road to allow movement of construction traffic along the AC cable route.
  - Areas for temporary storage and management of excavated top and sub soils.
  - Areas for temporary drainage and water management.
- The proposed AC cable route would be installed by a combination of open cut and trenchless methods. The trench width would typically be 1.5 m wide with a depth of 1.5 m, The minimum depth of cover would be typically 0.9 m for agricultural land; typically 2.0 m for watercourses and typically 0.75 m for roads.
- 2.11 Construction of the proposed converter station is planned to be undertaken over a period of 2 to 3 years from approximately 2019 to 2022.
- 2.12 It is also brought to Members' attention that the planning applications are not the only consents required for this development. The European Commission has developed guidelines to assist in the development of energy networks within Europe. These guidelines are known as the European Union's Trans-European Networks for Energy (TEN-E) Regulation. They set out guidance for streamlining the permitting process for major energy infrastructure projects that contribute to European energy networks. These projects are referred to as Projects of Common Interest (PCI). PCIs are projects which deliver benefits for connected European Member States, further support market integration and competition, enhance security of energy supply, and contribute to reducing carbon dioxide emissions. Viking Link has been confirmed as a PCI under the TEN-E Regulation. This is unaffected by the UK's decision to leave the EU.

Under the TEN-E Regulation, Member States are required to designate a National Competent Authority (NCA) who is responsible for coordinating the permitting process for PCIs. In this case the UK NCA role falls to the Marine Management Organisation (MMO) for tasks relating to the facilitation and co-ordination of the permit granting process. This role does not replace that of the Local Planning Authorities (LPA) in the decision making process, the MMO's role as NCA is to coordinate the decision making process with the relevant LPAs in the UK and the other jurisdictions affected by Viking Link in order to reach a 'Comprehensive Decision'. The Comprehensive Decision comprises all of the consents and permits necessary for a developer to be granted authorisation to construction of a PCI.

- 2.13 In addition to the 4 planning permissions in the UK the primary consents required are:
- Planning permission for the Denmark onshore scheme;
  - Offshore installation permit from the relevant Danish authorities for the installation of submarine cables;
  - Permit from the relevant German authorities for the installation of submarine cables;
  - Permits from the relevant Dutch authorities for the installation of submarine cables;
  - Marine licence from the MMO for the installation of submarine cables.

### 3.0 SITE DESCRIPTION

- 3.1 The converter station site consists of a 30 hectare field, broadly rectangular in shape currently in arable use located approximately 1.8 km to the north-west of Donington. The existing access to the site is from a narrow road known as North Ing Drove. To the north of the site are the wind turbines off the Bicker Fen wind farm and overhead electricity lines. The proposed permanent access road would be routed through agricultural land from the A52 to North Ing Drove and follows field boundaries for the majority of its length. The proposed AC cable route is also routed through agricultural land to the north of the proposed converter station site and east of the Bicker Fen 400 kV Substation.

### 4.0 RELEVANT PLANNING POLICIES

#### 4.1 The Development Plan

##### South Holland District Local Plan, July 2006

The South Holland Local Plan 2006 was formally adopted on 18 July 2006. Following a direction from the Government Office for the East Midlands under paragraph 1(3) of Schedule 18 to the Planning and Compulsory Purchase Act 2004, as of 18 July 2009 only certain Local Plan policies have been extended and continue to form part of the development plan. In the context of those saved policies referred to below, it is considered that the Local Plan was adopted in general accordance with the Planning and Compulsory Purchase Act 2004 (albeit under the transitional arrangements). Those policies referred to below are considered to accord with the thrust of guidance set out in the National Planning Policy Framework, and in the context of paragraph 215 of the NPPF should therefore continue to be given substantial weight in the decision making process.

Policy SG1 - General Sustainable Development  
Policy SG2 - Distribution of Development  
Policy SG4 - Development in the Countryside  
Policy SG6 - Community Infrastructure and Impact Assessment  
Policy SG7 - Energy Efficiency  
Policy SG11 - Sustainable Urban Drainage Systems (SUDS)  
Policy SG12 - Sewerage and Development  
Policy SG13 - Pollution and Contamination  
Policy SG14 - Design and Layout of New Development  
Policy SG15 - New Development: Facilities For Road Users, Pedestrians And Cyclists  
Policy SG16 - Parking Standards in New Development  
Policy SG17 - Protection of Residential Amenity  
Policy SG18 - Landscaping of New Development

If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, Section 38 (6) to the Town and Country Planning Act as amended by the 2004 Act states that the determination must be made in accordance with the plan unless material considerations indicate otherwise.

## National Guidance

### National Planning Policy Framework (NPPF), March 2012

Paragraph 14 - The presumption in favour of sustainable development

Paragraph 17 - Core planning principles

Section 1 - building a strong competitive economy

Section 7 - requiring good design

Section 10 - meeting the challenge of climate change, flooding and coastal change

Section 11 - Conserving and enhancing the natural environment

Section 12 - Conserving and enhancing the historic environment

### National Policy Statement

EN-1 - Overarching National Policy Statement for Energy

### Planning Practice Guidance (PPG), 2014

## 5.0 RELEVANT PLANNING HISTORY

5.1 None.

## 6.0 REPRESENTATIONS

6.1 The application has been the subject of two 28 day publicity periods, the first following the initial submission and the second following the submission of the supplementary information and amended red line boundary for the permanent access road.

### 6.2 Ward Councillor

Cllr J L King

Very concerned as to the height of the converter building and its impact on the surrounding area. Instead of blue and white could not the building be more of a barn and the colour be brown.

### 6.3 Donington Parish Council

"Find it incredulous that underground cables are to be brought from wind turbines in the North Sea so many miles to yet more infrastructure in Lincolnshire.

The PC are disappointed that, despite public consultation preferring the contextual style for the building, the application is submitted with the functional style, noting that South Holland District Council also went against public consultation. In a farming community it would be more acceptable to have a barn style building, particularly considering the height, rather than a blue and white monstrosity. This will be the highest building in the area despite the size of the new commercial building at Bicker Bar. They are sure that if a local farmer put in an application for a farming unit this size it would not be approved at this height. As in many applications the PC are not sure if the planning department have visited the site and appreciate how close it is to neighbouring properties.

It is felt that the fencing to the A standard access road should not be solid but more open to allow wildlife to still have their freedom in the Northorpe. It would also be preferred for it to be a temporary fence, to be removed after construction. Farmers will be very inconvenienced during the construction without this continuing permanently. There are concerns that the routing of the cables have no regard to the direction of the drainage systems in the fields which will render some fields unusable afterwards."

### 6.4 LCC Highways/SUDS

No objection subject to a condition requiring the provision of a Ghost-Island Right-turn lane on the A52 for the permanent access road.

"The operation of the development proposed in this Application would not be expected to have any discernible impact upon the operation of the highway network within the District. It is the

construction phase of the proposed development that would cause the greatest transportation impacts. However, the Application provides a very comprehensive account of the expected transportation impacts and how those impacts would, as much as is reasonably possible, be mitigated. The cable crossing of every public highway along the route of the cable would be achieved by non-dig engineering methods and there should not therefore be any need for the construction contractors to excavate the public highway. The access to the working areas along the route of the cable, for the workforce, construction equipment, construction materials and the cable itself, have been selected to have the least impact upon the safe operation of the public highway as possible. The Applicants and their Consultants have liaised with the Highway Authority throughout Pre-Application and the Application processes. Accordingly, provided construction of the proposed development is undertaken in accordance with the submitted details, and in particular the Construction Traffic Management Plan, and the highway improvement Condition requested, the residual cumulative impacts upon transportation would not be expected to be so severe that Consent would need to be withheld or restricted. Lincolnshire County Council has therefore concluded that the proposed development is acceptable and does not wish to object to this planning application."

#### 6.5 Environment Agency

In relation to the South Holland application - have reviewed the submitted flood risk assessment (FRA) in relation to the converter station and this has been found to be appropriate to the scale, nature and location of the proposed development. Accordingly, request that the mitigation measures in the FRA are secured via an appropriate planning condition.

Have reviewed the Construction Environmental Management Plan and are satisfied that as long as the measures and best practice outlined in this plan are implemented during construction, any impacts should be appropriately managed.

The ES mentions a diesel backup generator at the proposed converter station and note the mitigation measures for storage of hazardous substances in the CEMP and advise that any facilities, above ground, for the storage of oils, fuels or chemicals must be sited on impervious bases and surrounded by impervious bund walls.

No comments in respect of the amended plans and supplementary environmental information.

#### 6.6 Black Sluice IDB

The Board acknowledges that the applicant has addressed the concerns of the landowner involved with the construction and future usage of the permanent access road and his future requirements for land drainage.

The applicant is reminded of the Board's requirements for access for maintenance of its vested watercourses along the route of the access road at all times.

The applicant is reminded of the requirement for prior written consent from the Board for any works within any watercourse.

#### 6.7 Historic England

Initially raised concerns on heritage grounds but these related principally to the impact on a site in East Lindsey and on the approach to archaeological investigation along the full length of the cable route.

With regard to the impact of the converter station advised it would be helpful to produce a combined figure illustrating the designated heritage assets within the 3km study area around the converter station to enable SHDC to better assess how representative the photomontages in the figures attached to Chapter 22 (Vol 3) are of the views from these locations. SHDC must ensure that it has sufficient information to assess, guided by the advice of the conservation officer, the impact of the appearance of the converter station in such views on the significance of any assets affected within the District.

In relation to the second consultation reiterates concerns relating to the impact of a site in East Lindsey and the and the execution of sufficient archaeological investigation to inform the development of an appropriate mitigation strategy along the full length of the cable route.

#### 6.8 Natural England

Response relates to all 4 applications. Specifically in relation to the converter station comment: "note that the proposed converter station extends to 29.7ha and that a detailed Agricultural

Land Classification (ALC) field survey has been carried out by the applicants. This indicates that 28.8ha (97%) comprises best and most versatile agricultural land (i.e. Grades 1, 2 and 3a in Defra's ALC system). We are not able to verify the results of this survey as being robust as insufficient data has been presented in the accompanying schedule of soil information for example, climatic data (critical for a reliable grading), topographical and flood risk information, presence of calcium carbonate and other supporting detail. However it seems likely from the data that has been presented in Vol 4 ES Doc ES-4-C.04 (appendix 20) that a significant amount of BMV agricultural land is present on this site and that the majority of the loss will be permanent.

For Natural England to be able to offer further detailed advice on the grading of this land, we would need the applicants to supply a more comprehensive written report to explain the findings. This should include the missing climatic, topographic and flood data and calcium carbonate content and further information about the rationale for the wetness classes applied; and for the droughtiness assessment, the depth over which the available water capacity calculations have been made. It should also include the information about the competence of the person(s) who undertook the ALC survey work.

Government policy for the protection of agricultural land is set out in Paragraph 112 of the National Planning Policy Framework which states that:

'Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.'

The permanent development should also be assessed against the current adopted policy in the South Holland Local Plan for the protection of BMV agricultural land.'

Our comments on the assessment of the proposed underground AC cable route (extending to approximately 13ha of agricultural land, all predicted to be BMV (ALC Grade 2 land) mirror those for the DC cable route assessments which are:

Whilst there may be no overall loss of agricultural land due to underground cabling, whether there is a loss of quality will be entirely dependent on retaining and replacing soils correctly and to an adequate depth (normally 1.2m) to minimise the adverse impacts on soils during construction to maintain the pre-construction quality as is proposed. The EIA significance methodology could usefully recognise that some adverse short term impacts are likely to occur. Given that these adverse impacts are likely to be over an extensive area, these ought to be accounted for, e.g. as part of the magnitude of the impacts.

In response to the second consultation acknowledge that the supplementary ecological surveys provide additional and updated information to that provided in the original submission. Refer your authority to our standing advice to understand the impact of this development on protected species.

6.9 LCC Historic Environment Officer

Comments that this site passes through a number of archaeologically sensitive sites therefore recommend that the developer be required to commission a scheme of archaeological works to be secured by standard conditions.

6.10 SHDC Environmental Protection

Comments are awaiting and will be reported at the Committee.

6.11 North Kesteven DC

No objections.

6.12 Lincs Wildlife Trust

Comments relate to all 4 applications.

In relation to South Holland support the statement within the draft CEMP for the converter station and AC route under EC018 which states that 'Reinstatement of habitats should ensure that functionality and connectivity within the wider landscape is maintained'. This principle should be applied to the whole scheme and reinstatement should be carried out at the earliest possible time on a rolling programme to reduce the length of time that habitats are disturbed for.

6.13 John Hayes MP

Objects - shares local residents' concerns about the converter station design. Remains concerned about the cumulative impact of this development; this creeping industrialisation of the countryside is something which should be avoided at all costs. The noise impact on local residents and the sheer size and scale of the converter are major concerns.

6.14 Public

Petition with over 100 signatories headed:

"We the undersigned petition the council to respect the voice of our community. We request that planning on Ref H04-0823-17 be discarded under the proposed 'functional style' and replaced with a rural looking 'contextual style' as voted for by the majority of respondents during the consultation period with Viking Link. We request that the unnecessary fencing be abolished to the access road and allow our wildlife to continue to roam free without barriers."

The organiser of the petition has also submitted an individual comment to this effect as has another representation received.

Owner of Bank Farmhouse, Northorpe:

"I am an affected land owner. I am very concerned that after their restoration works have been completed our drainage system will not be as affective as we have it now, and we will not be able to re-drain in future years, as they will not allow us to re-drain over their cables. In future years if we can not re-drain the land will flood and will no longer be able to be used for crop production.

We also feel the cable depth beneath the base of our private dykes should be 2.7 meters the same as they are doing for the IDB dykes. To insure we can maintain our dykes in the future and allow for any environmental changes."

Resident of Park Lane, Donington has asked for confirmation that the works, heavy plant etc will not affect their 200 year old property's foundations or drainage.

Triton Knoll Offshore Wind Farm Ltd understand that infrastructure requirements for both Triton Knoll and Viking projects at Bicker Fen Substation can be accommodated and will be facilitated by National Grid. Further Viking and Triton Knoll representatives have communicated and shared information with the aim of reducing potential conflicts and cumulative impacts where practicable. However full detailed design of the equipment and infrastructure required at Bicker Fen Substation is not included in the Viking ES and TK reserve the position to object / comment on detailed crossings or any other infrastructure plans at Bicker Fen substation which could impact on the deliverability of the TKES.

NFU East Midlands Ltd- raise issues relating to the impact of the cable route on field drainage and the depth of the cable, plus a preference for the converter station to be in a barn style.

NFU and The Lincolnshire Association of Agricultural Valuers are concerned about the impact on farm businesses and agricultural production during construction and afterwards, in particular in relation to reinstatement of soils and drainage.

These points have also been made by two firms of chartered surveyors representing local landowners, who request further information.

6.15 Applicant

Has responded to comments made in the first round of consultation as follows:

Clarification of Design Detail and Planning Application Format

We want to take this opportunity to clarify the agreed form of this full planning application, as set out within Section 2.4 of the Planning Statement (VKL-08-39-G500-029). Reference has been made by a number of stakeholders to consents granted for infrastructure schemes in the region such as Triton Knoll and Hornsea offshore wind farms. It is important to acknowledge that consents for these schemes were sought and granted under the Planning Act 2008, as Development Consent Orders (DCO), and not, as is the case with NGVL, under the Town and Country Planning Act (TCPA) 1990.

A DCO under the Planning Act 2008 provides not just planning consent but can also incorporate other consents as well as authorisations for the acquisition of land. This is not the case with determination of the NGVL application whereby consents to be obtained out with the TCPA,

such as flood defence, highways and European Protected Species licences, will be obtained separately and at an appropriate point in the detailed scheme development, should planning permission be granted.

#### National Grid Viking Link Planning Application Submission

Full planning permission under the TCPA is being sought for everything within the planning Red Line Boundary (RLB). Indicative working layouts for development within the RLB are provided on the submitted Works Plans.

Interconnectors are complex electricity transmission systems; the detailed design of the UK Onshore Scheme is contractor dependent and subject to a competitive tender process. NGVL has, therefore developed a base scheme design for the purposes of seeking planning permission. This base scheme design establishes the maximum parameters within which the appointed contractor will develop and construct the detailed design. Approval will be sought by NGVL for the detailed scheme through the discharge of planning conditions imposed on the grant of any full planning permission.

The base scheme design comprises:-

-For the high voltage Direct Current (DC) and Alternating Current (AC) underground cables: Limits of Deviation (LOO) have been used which establish the maximum corridor in which the underground cables will be installed whilst providing some flexibility to make minor routing adjustments should they be required, for example, if unforeseen ground conditions are encountered.

-For the converter station: a 'Rochdale envelope' has been used which establishes the proposed converter station's maximum parameters including the location, layout and height of buildings and electrical equipment as well as associated development, including perimeter roads, hardstanding areas, drainage and landscape planting.

#### Converter Station Design - Clarification of Design Code

Feedback on the design of the converter station has been sought throughout the development of the Project. Principally, this involved consultation and engagement with residents, landowners, farmers, local authorities and other stakeholder groups during our Phase 2 consultation in September and October last year on the design styles that could be utilised on site, broadly either 'functional' or 'contextual' styles. The feedback from the community on these options was inconclusive as to a stand out preference. As such, Viking Link engaged with SHDC Officers and Elected Members, as the determining authority, for a view on the design style to be taken forward. This feedback led to the production of the Design Code, which was submitted as part of the planning application, whereby the design parameters were applied to the functional style to demonstrate how the Design Code can be used; the application does not seek approval for the functional style to be utilised. Detailed design, through discharge of conditions will provide this mechanism should planning permission be granted.

#### Converter Station - Scale and Height

The converter station scale and height are driven by engineering requirements and the equipment necessary to convert Direct Current to Alternating Current as well as safety clearances.

#### Third Party Crossing Agreements

NGVL is currently in dialogue with the Environment Agency (EA) and Network Rail (NR) in respect of crossing agreements of their assets affected by the proposed development within SHDC.

It is noted that the EA response to the planning application includes a holding objection until such time that a legal agreement between the EA and NGVL is signed. Whilst NGVL wish to confirm to SHDC that dialogue is ongoing with the EA on this matter NGVL do not consider the agreement to which the EA seek agreement material to the planning determination process, and indeed the EA note in their initial draft of the agreement that the relevant legislation comprises the Water Resources Act 1991 the Environmental Permitting Regulations 2016 and the Land Drainage Act 1991. (Note this holding objection from the EA does not relate to the South Holland application).

Internal Drainage Boards (IDBs): A signed Memorandum of Understanding has been signed between NGVL and all affected IDBs, this includes detail on crossing depths.

#### Triton Knoll Project

In respect of the holding representation submitted by Triton Knoll Offshore Wind Farm (TK), and

as the commentary on the NGET Bicker Fen substation above, until such time that NGET have sought the relevant notifications/permissions from BBC, NGVL are unable to provide further detail on the detailed design of the unlicensed works required within the substation to connect the Viking Link project NGVL therefore refer to the indicative substation layout referenced by NGET in the TK DCO hearing (12<sup>th</sup> November 2015), plan no. 2505-TKN-GIS-Z-YK-0003 (as enclosed) by way of a potential layout for Bicker Fen substation. The RLB and associated ES for Viking Link includes a large area around the substation and has considered cumulative impacts so as to address the scenario whereby both schemes (TK and NGVL) are constructed in parallel. Should permission be granted for Viking Link, co-ordinated discussions with all three parties will be held.

## Other Matters

National Farmers Union (NFU) and Lincolnshire Association of Agricultural Valuers (LAAV) NGVL met with the NFU and LAAV on the 15th November 2017 to discuss their response to the planning application. As detailed at the top of this letter, under 'Clarification of Design Detail and Planning Application Format' NGVL sought to reassure both the NFU and LAAV that unlike the DCO process, separate channels will need to be followed in respect of land acquisition and landowner agreement as well as the approval of additional permits and consents to commence any development outwith of the TCPA process should planning permission be granted. NGVL also wish to clarify that in the submission (ES chapter 9, table 9.3 Additional Consultation (Agriculture & Soils)), when NGVL have referenced engagement with the above parties, this is principally in a consenting role insofar as content of the application and evolution of the UK Onshore Scheme. Matters relating to land values and heads of terms discussions are outwith the planning process in this regard. Mindful of the importance of both drainage and agricultural reinstatement in the region, NGVL would be happy to work with both the NFU and LAAV alongside SHDC on any proposed condition wording on these matters in line with the six tests outlined at paragraph 206 of the NPPF. Finally NGVL wish to acknowledge that the covenant sought on land affected by the UK Onshore Scheme by virtue of voluntary agreements or compulsory purchase will be required in perpetuity.

A further response has been received from the applicant as follows:

In response to recent queries raised during our discussions with all four local planning authorities, NGVL have taken the opportunity, using specific questions raised by NKDC, to respond to matters raised by local land agents on behalf of their clients and owners.

NKDC asked if NGVL could advise where within the submission detail can be located, or clarity could be provided on:

1. A commitment to a farm by farm method statement / protocol to ensure that disturbed soil is re-instated on a like for like basis at least so there is no loss of agricultural land quality etc; and
2. Ensuring that the cable is at sufficient depth so that future drainage works can be undertaken, drainage ditches continue to function and the productivity of land is not reduced.

## NGVL Response

1. The Soil Handling and Storage Protocol (Doc Ref VKL-08-39-GS00 -026) as submitted with the application sets out the principles and procedures for good practice (embedded mitigation measures) and bespoke mitigation measures in soil handling, storage and reinstatement to be used for the UK Onshore Scheme. This protocol describes the principals that the appointed Contractor will follow to minimise adverse effects on the nature and quality of the soil.

Subject to grant of any permission, NGVL will work with each affected landowner to ensure the reinstatement of their land complies with this protocol.

NGVL have a commitment in the Heads of Terms (HoTs) to reinstate the working areas "to the Landowner's reasonable satisfaction, having carried out a photographic pre-entry schedule of condition, a copy of which will be provided to the Landowner"; NGVL will therefore produce and supply a record of condition to all landowners prior to starting works on their land.

In addition to this, NGVL will compensate landowners for losses which are a direct result of the proposed works. For example, it is anticipated on a project of this type that there would be a temporary, short-term reduction in the productivity of the land in the years immediately post construction, for which NGVL would compensate accordingly.

2. The planning Red Line Boundary includes the land necessary to ensure pre and post construction drainage is provided and that landowners can return to agricultural practice as currently employed on site .

In the Planning Statement (Doc Ref VKL-08-39-GS00-029) submitted with the applications, paragraphs 6.2.34 to 6.2.40 set out against planning policy, key assessment conclusions in respect of agriculture and soils. For further information please refer to Chapter 9, Volume 2 of the Environmental Statement.

The Heads of Terms for Viking Link stipulate that "NGVL shall employ suitably qualified contractors to carry out a pre and post construction assessment and to implement the requisite recommendations as soon as practicably possible, to ensure where reasonable and proportionate the agricultural land drainage systems on the Landowner's Estate are left in no worse condition than before the date of the Option."

Land drainage is of great importance for both landowners and NGVL. This is something NGVL take very seriously, which is why it has engaged the services of Land Drainage Consultancy Ltd (LDC) on this project. LDC are preparing conceptual pre and post construction drainage plans to help facilitate landowner engagement and discussion.

The aim of the drainage designs is to provide a suitable drainage system which will continue to function during and after the works, and so maintain productivity of the land, with a drainage system which is maintainable in the future .

For future drainage, landowners will be able to maintain and replace the drainage system, but there may be some restrictions on drainage works within the cable easement area (i.e. landowners will be able to continue maintaining the system, but will need supervision if they are carrying out excavation works in the easement area, for safety reasons). In some circumstances it may be necessary to realign drainage systems in the future (subject to further landowner discussions and agreement).

## 7.0 MATERIAL CONSIDERATIONS

7.1 The key issues for consideration in the determination of this application are:

- Principle of development and Planning Policy;
- Appropriateness of the development within a countryside location;
- Design of the Proposed Converter Station;
- Landscape and Visual Amenity;
- Ecology;
- Archaeology and Cultural Heritage;
- Traffic and transport;
- Agriculture and Soils;
- Socio-economics and Tourism;
- Noise and Vibration;
- Water and Hydrology;
- Geology and Hydrogeology;
- Agriculture and Soils;
- Cumulative effects.

7.2 Principle of development and Planning Policy

7.3 A number of specialist studies have demonstrated the need for, and benefits of increasing interconnection capacity between the UK and Europe, in particular as a means for addressing energy security, sustainability and affordability. The UK currently has four interconnectors to European countries which provides 4 gigawatts (GW) of interconnection capacity. Additional interconnectors are proposed that would double interconnection capacity to the equivalent of around 10% of the total electricity generated in the UK (based on 2014 figures). Viking Link's contribution to the UK's interconnection capacity by increasing it by 1,400 MW and providing enough electricity to supply millions of homes. Interconnectors have an important role to play in the transition towards a low carbon economy. The UK Government recognises the important role interconnectors play in achieving Great Britain's energy security, affordability and decarbonisation objectives. It is recognised that in order to have a competitive, sustainable and secure supply of energy, there is a need to invest in new infrastructure and diversify the way in which the energy market operates.

7.4 There are key legislative, policy and other drivers which underline the need for the project.

7.5 National Policy Statement (NPS): Overarching National Policy Statement for Energy (EN-1)

7.6 Although this strictly applies to Nationally Significant Infrastructure Projects via Development Consent Order regime rather than to planning applications, EN-1 recognises that the NPS is likely to be a material consideration in decision making on planning applications.

The NPS provide support for interconnector projects as follows:

-Paragraph 3.3.12 of EN-1: Overarching National Policy Statement for Energy notes that it is critical that the UK continues to have secure and reliable supplies of electricity as we make the transition to a low carbon economy. The NPS further notes that "existing transmission and distribution networks will have to evolve and adapt in various ways to handle increases in demand".

-The National Policy Statement for Electricity Networks Infrastructure (EN-5) highlights that the new electricity generating infrastructure that the UK needs to move to a low carbon economy, while maintaining security of supply, will be heavily dependent on the availability of a fit for purpose and robust electricity network. That network will need to be able to support a more complex system of supply and demand and cope with generation occurring in locations of greater diversity.

7.7 Section 4.5 of EN-1 includes the following on design:

"The visual appearance of a building is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object - be it a building or other type of infrastructure - including fitness for purpose and sustainability, is equally important. Applying "good design" to energy projects should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.

(and)

Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation.

(and)

Applicants should be able to demonstrate in their application documents how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected."

7.8 National Planning Policy Framework

7.9 There is the core presumption in favour of sustainable development. There are three dimensions to sustainable development: an economic role, a social role and an environmental role, which are mutually dependent.

7.10 One of the two NPPF policies of relevance to the design and access of the converter station site is the requirement for good design. It establishes that good design is a key element of sustainable development, indivisible from good planning. It appreciates that although appearance is a factor of prime importance, securing high quality and inclusive design goes further than purely aesthetic considerations.

7.11 The second relevant NPPF policy to the converter station site relates to conserving and enhancing the natural environment. It requires that new development should:  
-protect and enhance valued landscapes, geology and soil;  
-recognise wider ecosystem benefit;

- minimise impacts on biodiversity and provide net gains where possible;
- prevent unacceptable impact on soil, air, water, noise pollution and/or land instability; and
- remediate and mitigate land where necessary and appropriate.

#### 7.12 South Holland Local Plan 2006

7.13 A number of the saved policies are relevant to the consideration of the application. Policy SG1 states that proposals should be consistent with the principles of sustainable development. Policy SG4 allows for new development in an open countryside location, which is essential to the location and cannot be accommodated within the settlement limits. Policy SG14 requires development to be designed to ensure that it makes a positive contribution to the architectural and visual quality of its surroundings. Policy SG18 encourages the incorporation of landscaping proposals as an integral part of the design and layout and requires a landscaping strategy for major development.

#### 7.14 Appropriateness of the development within a countryside location

7.15 The UK Onshore Scheme by its very nature requires a countryside location. The delivery of the new DC and AC underground cabling and associated above ground infrastructure (converter station and access road) require sufficient open and accessible land that would not be possible or practical in a more urban location. The UK Onshore Scheme is a substantial scheme of linear infrastructure, with the operational parts of the Scheme and the associated construction corridor requiring continuous areas of open land of sufficient length and width. It must therefore avoid passing through urbanised areas or other more substantial settlements.

7.16 It is also the case that greenfield or open countryside land does not offer the same prohibitive construction costs that would undoubtedly apply in a more urban location. Following a basic sequential approach to development, there is no reasonable alternative to delivering the Scheme in a non-countryside location. Noting that the preferred point of connection onto the NETS is an existing substation location in a rural environment.

7.17 By virtue of a countryside location, the development will also largely avoid direct impacts upon existing built development within and adjoining the settlement limits, with the cable route corridor being designed to minimise any impacts in this regard. In this respect, there will be no adverse impacts on the rural economy, with the opportunity for enhancement through direct and indirect employment and increased economic activity within the region over the construction phase of the development.

7.18 Taking account of the cable route corridor there are no significant conflicts or severance of land located in and around the proposed route corridor and the Scheme is appropriate and in scale with a countryside location.

7.19 Moreover, given the majority of the Scheme will be buried underground; the permanent impacts (from a land-use planning perspective) are by their nature more limited, with large scale restoration of the land following the construction phase. The permanent evidence and impacts of the Scheme will therefore be limited to the converter station element of the Scheme. Other than the discrete marker posts, there will be no significant visible evidence of the DC/AC cable routes following construction, largely helping to maintain open spaces and the open nature of the countryside, whilst allowing land crossed to return to previous compatible (in respect of planning policy objectives) countryside uses including agriculture and recreational use whilst also supporting continued use by wildlife and their habitats. Whilst potentially not in SHDC area, along the AC route there will be link pillars marking the cable joins, above ground, the applicant with the landowners to keep these to field boundaries where practicable. Link pillar examples were submitted with the application.

7.20 In South Holland the proposal has a greater visual impact due to the converter station and access road.

#### Design of the Proposed Converter Station

- 7.21 The design intent is to achieve an effective and efficient design that brings together and harmonises a diverse range of buildings, outdoor equipment enclosures and external works, which responds to its context and environment with appropriate mitigation of impacts ascribed to its construction or operation. The distinctive aspect of the proposal is the scale of the development within a relatively open landscape subject to long distance views. The intention is to achieve a simple, clean and elegant form and silhouette without compromising the operational requirements of the proposed converted station.
- 7.22 As the specialist contractor responsible for the detailed design and construction of the converter station has yet to be appointed, certain aspects of the detailed design will be subject to condition and subsequent approval. It is for this reason that a Design Code has been submitted with the application to guide the detailed design of the building and outdoor electrical zone (Rochdale Envelope).
- 7.23 The converter station's base design has been produced to a standard within which the contractor's detailed design will comply. The base design establishes parameters including details of the maximum size, layout and appearance of the proposed converter station.
- 7.24 The Design Code establishes the requirements to be met by the contractor including selection of colour(s) and material(s). Full details of the final appearance would be confirmed through submission and discharge of planning conditions. The sketches within the Design Code show what might result from the application of the code principles to a notional assembly of key elements of the building and outdoor electrical equipment zone (Rochdale Envelope). This is part of a hypothetical design and does not represent a design proposal, but instead shows how the key elements might relate to each other, and be applied from the Design Code.
- 7.25 The following section of the report deals with the findings of the Environmental Statement.
- 7.26 Landscape and Visual Amenity
- 7.27 As the DC and AC cable routes are buried infrastructure they have no significant long term impacts on the landscape character of the area. In developing the route key landscape features have been avoided where possible and any features impacted by construction, e.g. hedgerows, trees etc. will be reinstated.  
The DC and AC cable route are predicted to result in some impacts on visual amenity but these will be temporary during the construction phase with short term effects once operational while reinstatement becomes established.
- 7.28 The converter station will result in permanent effects on landscape character and visual amenity, mitigated as far as possible through a combination of orientation, siting, landscape design and the use of a Design Code to reflect the site and surroundings. The converter station and permanent access road are assessed as having an acceptable impact on landscape character. The converter station site will benefit from large areas of new landscape planting which will assist in screening views of the lower element of the development and provide new habitats. Whilst the scale of the resulting development means that it will be seen from longer range views, these views will be set against and filtered by landscape planting as well as other local infrastructure such as the adjacent overhead power lines and wind farm.
- 7.29 Ecology
- 7.30 An extensive programme of protected species and habitat surveys was undertaken as part of the EIA for the proposed development, the scope of which was agreed with relevant statutory consultees. The DC and AC cable routes will result in some temporary disturbance / displacement of protected species during the construction phase but there will be no significant effects. The DC and AC cable routes will result in the temporary loss of some habitats. The design of the route has sought to minimise these impacts where possible and mitigation has been proposed where impacts are unavoidable including habitat reinstatement on completion of the construction phase.
- 7.31 At the converter station site there will be some disturbance and loss of habitat. However, through the use of the landscape masterplan the opportunity has been made for habitat creation and the planting of tree and shrub species reflective of the local area. The converter station and

permanent access road has also been assessed and, following implementation of the proposed mitigation, the level of impacts on ecological receptors from the construction and operation of the proposed converter station are considered acceptable.

- 7.32 It is therefore considered that the proposed development is in compliance with policy requirements, in that it will not lead to the loss of, or significant harm to important habitats. Impact will be addressed through appropriate mitigation including working with the relevant bodies to obtain the necessary licences and consents prior to construction.
- 7.33 Archaeology and Heritage
- 7.34 The DC and AC cable routeing has sought to avoid designated archaeology. An Archaeological Mitigation Strategy accompanies the submission. There is no issue with the cable routeing within South Holland.
- 7.35 Trial trenching has been undertaken at the converter station site, the results of which concluded the removal of archaeological assets prior to construction. A full programme of mitigation will ensure that heritage assets identified are investigated, recorded etc. prior to commencement of construction as set out in the Archaeological Mitigation Strategy. There is no objection from LCC Historic Environment Officer, subject to conditions. It is therefore considered that the Scheme is compliant with national and local policy relating to the historic environment.
- 7.36 Traffic and Transport
- 7.37 Construction traffic has been assessed in detail taking into account seasonal fluctuations in traffic levels (summer and winter) on the main highway network. A Construction Traffic Management Plan (CTMP) will be developed in consultation with LCC and implemented based on the draft CTMP submitted with this application.
- 7.38 Once built and operational the converter station will result in very little traffic due to the low day to day staffing levels required to operate the site. The key traffic management issue therefore, is traffic generated by construction for both the converter station and cable route. LCC Highways has no objection subject to a condition requiring the provision of a Ghost-Island Right-turn lane on the A52 for the permanent access road.
- 7.39 It is considered that the proposed development complies with policy requirements in that it will not lead to significant impact on local communities and the environment.
- 7.40 Agriculture and Soils
- 7.41 The underground cabling works would result in the temporary loss of approximately 198.6 ha of land, across the 4 district, 74% of which is 'Best and Most Versatile' (BMV) agricultural land. Following completion of these works all agricultural land would be returned to its former state, therefore, there would be no permanent effect on agricultural land as a result of the underground cabling.
- 7.42 Protection of higher grade agricultural land is considered within both a national and local planning policy context. The NPPF states at paragraph 112 that LPA's should take into account the economic and other benefits of the best and most versatile agricultural land and where significant development is proposed give preference to first developing on poorer quality land. Aligned to the NPPF, the NPPG refer to the Agricultural Land Classification, which should be used as tool for determining the quality of agricultural land informing planning decisions on such land.
- 7.43 The converter station and access road would result in the permanent loss of 20ha of BMV. Whilst every effort has been made to reduce the permanent loss of BMV and minimise disruption to agricultural activities, there is some inevitable loss of BMV in this case, with there being no reasonable alternative to use poorer quality land. During site selection consideration was given to agricultural land and avoiding areas of BMV if possible whilst taking into account other siting considerations. However, given the prevalence of BMV agricultural land no

reasonable alternative sites on poorer quality land were considered feasible. On balance, this part of the Scheme is considered to respect the wider aims of the policy objectives as set out in the NPPF, NPPG, particularly in this respect of loss versus overall supply and when considered in the wider 'planning balance' with regard to the national imperative of delivering new electricity infrastructure and as such has addressed the comments of Natural England.

#### 7.44 Socio-economics and Tourism

7.45 It is considered there will be no significant detrimental impacts in terms of socio-economics as a result of the development. There is potential for beneficial effects during construction through the use of local services, accommodation, shops etc. by the construction workforce alongside the use of local suppliers for materials, plants, machinery etc. The effects on tourism are considered temporary during the construction of the proposed DC cable route and as such are not directly related to South Holland.

7.46 The proposal interacts with a number of Public Rights of Way due to its linear nature, and subject to permission being granted, NGVL recognises that temporary diversions will be required during the construction phase, principally for health and safety. The proposed permanent access road for the converter station will necessitate the permanent diversion of an existing PRow in order to maintain its continued use. An application to divert this would be made should planning permission be granted.

#### 7.47 Noise and Vibration

7.48 There are two aspects of noise associated with the proposed development. The first relates to noise associated with the operation of the converter station and second to noise associated with the temporary construction activities for the UK Onshore Scheme.

7.49 Once constructed, it is anticipated that any noise resulting from operation of the converter station will be controlled by limits set by planning conditions. The applicant has undertaken the necessary assessments to show that identified limits can be met.

7.50 During construction the Project is committed to the implementation of noise mitigation consistent with Best Practicable Means (BPM), which is recognised best practice and is considered to reduce noise as far as is reasonably practicable. The applicant has undertaken a comprehensive assessment of potential noise impacts to conclude that noise generated by the development during construction would not result in detrimental impact or harm to residential amenity. Impacts during construction such as noise and air quality can be controlled via planning conditions which will secure a detailed Construction Environmental Management Plan (CEMP). To avoid or limit the adverse impacts, noise mitigation measures will be incorporated within, and implemented through, a CEMP based on BPM, which is submitted with the planning application.

The NPPF stipulates under "Conserving Enhancing the Natural Environment" that new and existing development should be prevented from contributing to or being put at unacceptable risk from or being adversely affected by unacceptable levels of noise pollution. Policy SG13 (Pollution and Contamination) of the South Holland Local Plan, advises permission will only be permitted for development proposals which do not cause unacceptable levels of pollution of the surrounding area by noise.

7.51 The relevant national and local policies seek to protect the general amenities of people living nearby to new development through the consideration of relevant amenity criteria including noise and disturbance. The proposal has, where ever possible, through its siting, design and layout sought to prevent or reduce any detrimental impact on residential amenity and other sensitive receptors. To avoid or limit the adverse impacts during construction, noise mitigation measures will be incorporated within, and implemented through, a CEMP a draft of which has been submitted with the planning application. This will be secured through planning conditions.

#### 7.52 Water and Hydrology

7.53 Due to the linear nature of the Scheme, the DC and AC cable routes will involve a high number of watercourse and drain crossings. Trenchless and non-trenchless crossing techniques have

been set out in the ES and the applicant has committed to trenchless crossing techniques for main rivers, chalk streams and major drain crossings. Subject to dialogue with the relevant bodies, necessary consents will be obtained and the appropriate techniques will be applied.

- 7.54 The converter station site is situated within Flood Zone 2 and 3, defined as at medium to high risk of fluvial/tidal flooding. A Flood Risk Assessment (FRA) has been undertaken for the proposed converter station and the access road. The EA found the FRA to be appropriate to the scale, nature and location of the proposed development and request that the mitigation measures in the FRA are secured via an appropriate planning condition.
- 7.55 Construction of the converter station and permanent access road would increase the less permeable areas and in turn potentially increase surface water flood risk. With the incorporation of appropriate mitigation measures, the significance of residual effects for the proposed converter station and permanent access road are not significant. No significant effects are anticipated for water and hydrology during operation of the Scheme.
- 7.56 Policy SG11 (Sustainable Urban Drainage Systems) of the South Holland Local Plan requires that development generating surface water run-off, likely to result in increased flood risk shall include surface water management systems that accord with sustainable development principles and adequately mitigate any adverse effects from surface water run-off on people, property and habitats. The Outline Drainage Strategy submitted in support of the application sets out the measures that will be put in place to attenuate run-off and drainage for the converter station site. This will include creation of a dedicated attenuation pond within the attenuation zone.
- 7.57 Water management measures will be put in place during the construction of the DC and AC cables to control surface water run-off and ground water discharge. Pre and post construction land drainage will be put in place to maintain the integrity of the existing land drainage systems.
- 7.58 Geology and Hydrogeology
- 7.59 The DC and AC cable routes have avoided mineral safeguarding areas and known areas of contaminated land in the development of the Scheme. Ground investigation surveys have been undertaken to establish a high level understanding of the underlying geology and ground conditions along the proposed cable route and converter station site to inform the Scheme design.
- 7.60 For the converter station key elements of the mitigation for geology and hydrogeology concern the effective and efficient management of excavated materials through the development of a materials management strategy, controls on how construction materials are handled and stored to prevent uncontrolled releases to ground and the design of earthworks, foundations, ground gas mitigation and the AC cable trench and trenchless installation locations. The site must also comply with storage regulations for hazardous materials and implementing operational and environmental procedures and controls to limit the potential for uncontrolled releases to occur to ground.
- 7.61 Cumulative Effects
- 7.62 A cumulative assessment has been undertaken to take in to consideration potential impacts from the combined environmental impacts of the different components of the project (ie the UK Offshore Scheme with the UK Onshore Scheme, or the proposed DC cable route with the proposed converter station), and the UK Onshore Scheme in combination with other projects. These are referred to as intra-project and inter project effects. Officers consider the cumulative effects have been appropriately considered.
- 7.63 Other Factors
- 7.64 Consideration has been given to electric and magnetic fields (EMFs) produced by the proposed converter station and onshore high voltage DC bipole cables (proposed onshore elements of the Project). The converter station will be voltage source converter (VSC) technology and operate using both direct current (DC) and AC frequencies. The DC cables will operate in a

bipole arrangement at  $\pm 525\text{kV}$  carrying 1400 Megawatts (MW) of power. All equipment that generates, distributes or uses electricity produces EMFs. The power frequency of alternating current equipment in the UK is 50 Hz, and AC equipment will produce electric and magnetic fields with a principal frequency of 50Hz. These EMFs are known as Extremely Low Frequency (ELF) EMFs. DC equipment produces steady state electric and magnetic fields and these are referred to as static fields. All static and alternating fields can have different effects, but in both cases, there are exposure limits set by independent organisations, designed to prevent all established effects of EMFs on people. The Project uses both AC and DC technology, so both static and alternating electric and magnetic fields will be produced. The new VSC converter station will be designed to ensure that it is compliant with International Commission on Non-Ionising Radiation Protection (ICNIRP) public exposure guidelines for EMFs outside the boundary fence. It has been demonstrated that the DC cables would be compliant with exposure limits so there will be no significant EMF effects resulting from the Project.

- 7.65 Human Rights and the Equality Act have been considered and the Council has considered the effect of the proposal on individuals and businesses in preparing this report.
- 7.66 Conclusion
- 7.67 The importance of the development as essential National and European infrastructure which is in the public interest along with the locational requirements of the type and scale of development proposed are material considerations which weigh in favour of the proposed development.
- 7.68 The submitted EIA has identified and assessed the likely significant effects which would result from its construction and operation. Through careful siting and routing as well as embedding mitigation within the base scheme design and the provision of further mitigation where possible and appropriate, it is considered a number of potentially significant environmental effects have been prevented or reduced. However, given the scale of the Scheme a small number of significant environmental effects are unavoidable and as such will remain following mitigation. The majority of significant environmental effects will occur during construction of the Scheme and whilst significant they will be temporary lasting for the duration of construction works only. Where significant environmental effects are predicted to be permanent these relate to above ground components of the Scheme only (the proposed converter station and the permanent access road).
- 7.69 The proposed DC cable route is not predicted to result in significant environmental effects in the long term. Significant environmental effects are predicted to occur during construction only. This includes effects on residents and visitors in proximity of the proposed DC cable route who may experience significant noise and/or visual effects as well as some roads which will be used during construction where increases in traffic flows as a result of construction traffic are predicted to be significant. However, it should be noted that whilst some significant environmental effects are predicted these will not occur along the full length of the proposed route for the duration of construction but rather for short periods of time whilst the proposed route is constructed in sections.
- 7.70 The proposed converter station is predicted to result in temporary and permanent significant environmental effects. Temporary significant effects are predicted on landscape character and visual amenity. Permanent effects on landscape character and visual amenity have been mitigated as far as possible through the inclusion of landscape planting within the base scheme design, however, significant effects will remain. Permanent significant effects are also predicted as a result of:
- Physical impacts on heritage receptors within the proposed converter station site; these have been mitigated as far as possible through commitments to pre-construction investigation and recording of heritage receptors.
  - The permanent loss of BMV agricultural land as a result of the proposed converter station's permanent land take is considered acceptable. Whilst over 20 hectares (ha) will be lost the assessment notes over 90% of land within the district is classed as BMV.

Having regards to the clear need and national policy support for the proposed development and local level policy compliance and balancing the weight afforded to identified material planning considerations alongside mitigation measures proposed, the proposed development is considered to be policy compliant and there are no material planning considerations in place

which would override this position.

## 8.0 RECOMMENDATIONS

- 8.1 Approve subject to those Conditions listed at Section 9.0 of this report, subject to allowing officers under delegated authority to revisit condition wording, in conjunction with the other 3 Local Planning Authorities once the outcomes of the applications submitted to North Kesteven DC, East Lindsey DC and Boston BC are known.

## 9.0 CONDITIONS

1. The development must be begun not later than the expiration of five years beginning with the date of this permission.
- Reason: As required by Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.
2. The development hereby permitted shall be carried out in accordance with the following approved plans:  
Environmental Statement and Appendices; Submitted Drawings (full list to be included on decision notice); VKL-08-39-G500-010 Flood Risk Assessment; VKL-08-39-G500-012 Design Code and other supporting documents (full list to be included on decision notice);
- Reason: For the avoidance of doubt and in the interests of proper planning.
3. Except for the Permitted Preliminary Works, the commencement the Development of the converter station shall not take place until there has been submitted to, approved in writing by, and deposited with the Council a scheme which shall include provisions for the:
- (i) details of the siting, design, external appearance and dimensions of all buildings and structures which form part of the converter station;
  - (ii) details of the colour, materials and surface finishes in respect of those buildings and structures referred to in (i) above;
  - (iii) details of vehicular circulation roads, parking, hardstandings, turning facilities and loading and unloading facilities on the converter station site;
  - (iv) details of all new or modified permanent fencing and gates required on the converter station site; and
  - (v) details of permanent artificial lighting required during the operation of the converter station.
- Reason: To enable the Council to exercise reasonable and proper control over the design and appearance of the Development.  
This Condition is imposed in accordance with Policy SG14 of the South Holland Local Plan 2006.
4. The dimensions of the main buildings and structures of the converter station shall not exceed the dimensions set out in Table 17.3 and 17.4 of chapter 17 of the Environmental Statement.
- Reason: To enable the Council to exercise reasonable and proper control over the design and appearance of the Development.  
This Condition is imposed in accordance with Policy SG14 of the South Holland Local Plan 2006.

5. Prior to the commencement of any other engineering operations within the parts of the permitted development that will be accessed from the A52 Donington by-pass, the A52 shall be improved by the construction of a Ghost Island Right-turn Lane, the details of which shall first be submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of providing safe and adequate access for the construction of the permitted development and to ensure the safety of the users of the public highway. This Condition is imposed in accordance with Policies SG14 and SG15 of the South Holland Local Plan, 2006.

6. Except for Permitted Preliminary Works the commencement of the converter station construction shall not take place until there has been submitted to, approved in writing by, and deposited with the Council a Construction Environmental Management Plan. The Plan shall include details of how noise, dust and other airborne pollutants, vibration, smoke, and odour from construction work including from piling and associated traffic movements, from both inside and outside the Site boundary, will be controlled and mitigated. The construction of the specified phase of the Development shall be completed in accordance with the approved Plan unless otherwise agreed in writing by the Council.

Reason: To ensure reasonable and proper control to be exercised over the methods of construction of the Development. This Condition is imposed in accordance with Policy SG17 of the South Holland Local Plan 2006.

7. Except for Permitted Preliminary Works the commencement of the underground cable installation shall not take place until there has been submitted to, approved in writing by, and deposited with the Council a Construction Environmental Management Plan. The Plan shall include details of how noise, dust and other airborne pollutants, vibration, smoke, and odour from construction work including from piling and associated traffic movements, from both inside and outside the Site boundary, will be controlled and mitigated. The construction of the specified phase of the Development shall be completed in accordance with the approved Plan unless otherwise agreed in writing by the Council.

Reason: To ensure reasonable and proper control to be exercised over the methods of construction of the Development. This Condition is imposed in accordance with Policy SG17 of the South Holland Local Plan 2006.

8. Except for Permitted Preliminary Works the commencement of the converter station construction shall not take place until there has been submitted to, approved in writing by, and deposited with the Council a Construction Traffic Management Plan. For the avoidance of doubt all construction traffic for the converter station shall use the permanent access road from the A52. The construction of the converter station shall be completed in accordance with the approved Plan unless otherwise agreed in writing by the Council.

Reason: To ensure reasonable and proper control to be exercised over the methods of construction of the Development. This Condition is imposed in accordance with Policies SG15 and SG17 of the South Holland Local Plan 2006.

9. Except for Permitted Preliminary Works the commencement of the underground cable installation shall not take place until there has been submitted to, approved in writing by, and deposited with the Council a Construction Traffic Management Plan and Access Route which incorporates adequate provision for addressing any abnormal wear and tear to the highway has been submitted to, approved in writing by and deposited with, the Council. The Construction Traffic Management Plan shall include proposals to control and manage construction traffic using the 'Construction Traffic Access Route' and to ensure that no other local roads are used by construction traffic. The underground cable installation shall be completed in accordance with the approved Plan unless otherwise agreed in writing by the Council.

Reason: To ensure reasonable and proper control to be exercised over the methods of construction of the Development. This Condition is imposed in accordance with Policies SG15 and SG17 of the South Holland Local Plan 2006.

10. All activities associated with the construction of the Development shall be carried out in accordance with British Standard 5228: 2009 +A J :2014 : Code of practice for noise and vibration control on construction and open sites - Part I - Noise, Part 2 - Vibration.

Reason: To ensure reasonable and proper control to be exercised over the methods of construction of the Development.

This Condition is imposed in accordance with Policy SG17 of the South Holland Local Plan 2006.

11. No construction work associated with the Development shall take place on the Site on any Sunday or Bank Holiday or on any other day except between the following hours:

Monday to Friday 0700 - 1900  
Saturday 0700 - 1700

Unless such work -

(a) is associated with an emergency ; or

(b) is carried out with the prior written approval of the Council; or

(c) does not cause existing ambient background noise levels to be exceeded.

Reason: To ensure reasonable and proper control to be exercised over the methods of construction of the Development.

This Condition is imposed in accordance with Policy SG17 of the South Holland Local Plan 2006.

12. No impact piling approved under the Plan approved pursuant to Condition (14) shall take place on the Site on any Sunday or Bank Holiday or on any other day except between the following hours:

Monday to Friday 09.00 - 18.00  
Saturday 09.00 - 13.00

Unless such work -

(a) is associated with an emergency; or

(b) is carried out with the prior written approval of the Council.

Reason: To ensure reasonable and proper control to be exercised over the methods of construction of the Development.

This Condition is imposed in accordance with Policy SG17 of the South Holland Local Plan 2006.

13. No heavy commercial vehicles associated with the construction of the Development shall enter or leave the Site on any Sunday or Bank Holiday or on any other day except between the following hours:

Monday to Friday 0700 - 1900  
Saturday 0800 - 1600

Unless such movement:

(a) is associated with an emergency; or

(b) is carried out with the prior written approval of the Council.

Reason: To ensure reasonable and proper control to be exercised over the methods of construction of the Development and to reduce the number of traffic movements for the safety of other road users and pedestrians.

This Condition is imposed in accordance with Policy SG17 of the South Holland Local Plan 2006.

14. In any instance where a time limitation referred to in Conditions (11), (12) and (13) is not adhered to, the applicant shall as soon as practicable notify the Council and follow up the notification with a written statement detailing the nature of the emergency and the reason why the time limitation could not be observed .
15. The use of columns for artificial lighting shall not exceed the obtrusive light limitations of sky glow, light into windows, source intensity and building luminance specified in the Institution of Lighting Engineers document "Guidance Notes for the Reduction of Obtrusive Light: GNO1 2011", nor shall such lighting be arranged so that danger or inconvenience is caused to users of the nearby public highways.

Reason: To reduce light pollution and protect the amenity of local residents and highway safety. This Condition is imposed in accordance with Policy SG17 of the South Holland Local Plan 2006.

16. For the duration of the construction period of the converter station and underground cable installation all heavy commercial traffic associated with the construction of the converter station and underground cable installation will comply with the Construction Traffic Management Plan and use only the Construction Traffic Access Route and no other local roads unless approved in writing with the Council in consultation with the Highway Authority or is associated with an emergency.

Reason: To ensure reasonable and proper control to be exercised over the methods of construction of the Development and to reduce the number of traffic movements for the safety of other road users and pedestrians.  
This Condition is imposed in accordance with Policy SG17 of the South Holland Local Plan 2006

17. The commissioning of each phase of the Development shall not take place until there has been submitted to, approved in writing by, and deposited with the Council a programme based on the Environmental Statement for the monitoring and control of noise generated by the normal commercial operation of the specified phase of the Development. The programme shall specify the locations from which noise will be monitored, the method of noise measurement (which shall be in accordance with BS 4142 2014 and the maximum permissible levels of noise at each such monitoring location. At such measurement locations noise levels shall not exceed the levels specified in the approved programme, except in an emergency or with the prior written approval of the Council.

Reason: To ensure the proper control of noise during the operation of the Development.  
This Condition is imposed in accordance with Policy SG17 of the South Holland Local Plan 2006

18. A point of contact will be provided by the applicant to local residents and Local business for any queries or complaints relating to noise generated by the construction and/or operation of the Development. If a local resident or local business complains direct to the applicant or the applicant has been notified in writing by the Council of any complaint about noise generated by the construction and/or operation of the Development the applicant shall carry out investigations to establish the justification, or otherwise, of the complaint, the likely cause and possible remedial measures. A written report to the complainant, copied to the Council, shall be made as soon as reasonably practicable following the investigation and/or remedial work. The applicant shall keep all such reports in an appropriate file and such file shall be made available to the Council on request.

Reason: To ensure that any complaints on the grounds of noise are properly dealt with so as to reduce the impact of the Development on local residents.  
This Condition is imposed in accordance with Policy SG17 of the South Holland Local Plan 2006.

19. Prevention of Contamination of Watercourses

Except for the Permitted Preliminary Works, the commencement of each phase of the Development shall not take place until there has been submitted to, approved in writing by, and deposited with the Council, in consultation with the Environment Agency, a scheme showing the method and working of drainage facilities on the Site associated with the specified phase of the Development. Such facilities shall be put in place in accordance with the approved scheme. The specified phase of the Development shall be completed in accordance with the approved scheme unless otherwise agreed in writing by the Council.

Reason: To ensure proper drainage of the Site and that proper containment facilities are built.

20. The scheme referred to in Condition (19) shall include:

(i) measures to ensure that no leachate or any contaminated surface water from the Site associated with the specified phase of the Development shall be allowed at any time to enter directly or indirectly into any watercourse or underground strata or onto adjoining land;

(ii) provision to ensure that all existing drainage systems continue to operate and that riparian owners upstream and downstream of the Site associated with the specified phase of the Development are not adversely affected;

(iii) provision for trapped gullies in car parks, hardstandings and roadways;

(iv) measures to ensure that all foul sewage drains to an approved foul sewerage and/or sewage disposal system;

(v) provisions to distinguish between temporary and permanent parts of the works; and

(vi) provision to ensure that there is no discharge of water from the Site associated with the specified phase of the Development until such a time as the permanent surface water drainage system is operational with provisions to contain any run-off from the Site associated with the specified phase of the Development.

Reason: To ensure proper drainage of the Site and that proper containment facilities are built.

21. Any surface water contaminated by hydrocarbons which are used during the construction of the Development shall be passed through oil/grit interceptor(s) prior to being discharged to any public sewer or watercourse or to any other surface water disposal system approved by the Environment Agency.

Reason: To ensure proper drainage of the Site and that proper containment facilities are built.

22. All facilities required for the storage of hydrocarbons, process chemicals or similar liquids which are used during the construction of the Development must be sited on impervious bases and surrounded by impervious bund walls. The size of the bunded compound(s) shall be at least equivalent to the capacity of the largest tank plus 10%. All filling points, vents and sight glasses must be located within the bund and there must be no drain through the bund floor or walls.

Reason: To ensure that proper containment facilities are built

23. Any storage facility to which Conditions (21) or (22) refer shall be completed in accordance with the requirements of those Conditions before being brought into use.

Reason: To ensure that proper containment facilities are built.

24. Except for the Permitted Preliminary Works contaminated material arising from the construction of the Development shall be treated on the Site in accordance with a scheme to be submitted to, approved in writing by, and deposited with, the Council, in consultation with the Environment Agency, or shall be disposed of to licensed disposal facilities.

Reason: To ensure that contaminated waste found on the Site is disposed of properly.

25. The commencement of the converter station construction shall not take place until a scheme of landscaping and creative conservation which shall accord with the approach outlined in the landscape and ecology chapters and appendices of the Environmental Statement, has been submitted to and approved in writing by the Council, in consultation with Natural England and the Environment Agency. The specified phase of the Development shall be completed in accordance with the approved scheme unless otherwise agreed in writing by the Council.

Reason: To ensure proper landscaping for the Development.

This Condition is imposed in accordance with Policy SG18 of the South Holland Local Plan 2006.

26. The scheme referred to in Condition (27) shall deal with the treatment of any environmentally sensitive areas their aftercare and maintenance as well as the general provision of screening, shrub and tree planting and grassed areas and means of integrating the Development with the surrounding landscape and shall include details of the following matters:

(i) planting (which should be mainly of locally native species, ideally with a local provenance);

(ii) management of existing and new planted areas including protection of existing planting during construction;

(iii) restoration of areas affected by construction works;

(iv) details of grass seed mix for areas of the Site to be restored to grassland;

(v) details of the height, type, size and species of the shrubs and trees to be planted ;

(vi) details of the measures to be taken to create new flora and fauna habitats and of the management of such new habitats including the Sustainable Urban Drainage Water feature.

Reason: To ensure proper landscaping for the Development.

This Condition is imposed in accordance with Policy SG18 of the South Holland Local Plan 2006.

27. The landscaping and planting, including grass sowing, shall take place in accordance with the scheme referred to in Condition (26) and no later than the appropriate planting or sowing season following the completion of the construction of the specified phase of the Development, unless otherwise agreed in writing by the Council. Any trees or shrubs, including hedges, which die, become seriously damaged or diseased or are removed within five years from the date of planting shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the Council.

Reason: To ensure proper landscaping for the Development.

This Condition is imposed in accordance with Policy SG18 of the South Holland Local Plan 2006.

28. The construction of the Development shall only be carried out in accordance with the approved Flood Risk Assessment (FRA), undertaken dated, especially the following mitigation measures detailed in the FRA:

(i) the converter station zone shall be located on a platform set no lower than 2.9 metres above Ordnance Datum; and

The mitigation measures shall be fully implemented prior to occupation and the Company shall confirm completion of the approved scheme in writing to the Council and the Environment Agency within one month thereafter.

Reason

To reduce the risk of flooding to the Development and future occupants.

This Condition is imposed in accordance with national guidance contained in Section 10 of the National Planning Policy Framework, 2012.

29. The commencement of the Development shall not take place until a surface water drainage scheme for the Site based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the Development, has been submitted to and approved in writing by the Council. The scheme shall be implemented in accordance with the approved details prior to the commissioning of the Development unless otherwise agreed in writing by the Council.

Reason: To ensure there is no increase in the risk of flooding, both at the Site and to third parties, as result of the Development.

This Condition is imposed in accordance with Policies SG11 and SG12 of the South Holland Local Plan 2006 and national guidance contained in Section 10 of the National Planning Policy Framework, 2012.

30. Within 6 months of the Development ceasing to be used for the purposes of electricity transmission the Company shall submit to the Council, for approval in writing, a scheme for the demolition and removal of redundant buildings and structures from the Site and the restoration of the Site and unless otherwise agreed in writing by the Council shall thereafter implement the approved scheme.

Reason: To ensure the Site is not allowed to become derelict after the cessation of electricity transmission.

31. The scheme referred to in Condition (30) shall include:

- (i) details of all structures and buildings which are to be demolished;
- (ii) details of the means of removal of materials resulting from the demolition;
- (iii) the phasing of the demolition and removal;
- (iv) the means of de-contaminating the Site;
- (v) the means of removal of any contaminated material;
- (vi) the phasing of the de-contamination works;
- (vii) details of the restoration works; and
- (viii) the phasing of the restoration works.

Reason: To ensure the Site is not allowed to become derelict after the cessation of electricity transmission.

32. No development shall take place until a written scheme of archaeological investigation has been submitted to and approved in writing by the Local Planning Authority. This scheme should include the following and should be in accordance with the archaeological brief supplied by the Lincolnshire County Council Historic Environment advisor on behalf of the Local Planning Authority:

1. An assessment of significance and proposed mitigation strategy (i.e. preservation by record, preservation in situ or a mix of these elements).
  2. A methodology and timetable of site investigation and recording
  3. Provision for site analysis
  4. Provision for publication and dissemination of analysis and records
  5. Provision for archive deposition
  6. Nomination of a competent person/organisation to undertake the work
  7. The scheme to be in accordance with the Lincolnshire Archaeological Handbook.
- The archaeological site work shall only be undertaken in accordance with the approved written scheme.

Reason: To ensure the preparation and implementation of an appropriate scheme of archaeological mitigation in accordance with national guidance contained in Section 12 of the National Planning Policy Framework, 2012. This issue is integral to the development and therefore full details need to be finalised prior to the commencement of works.

33. The applicant shall notify the Lincolnshire County Council Historic Environment Department in writing of the intention to commence at least fourteen days before the start of archaeological work required in connection with Condition 32 above in order to facilitate adequate monitoring arrangements.

Reason: To ensure satisfactory archaeological investigation and retrieval of archaeological finds in accordance with national guidance contained in Section 12 of the National Planning Policy Framework, 2012.

34. A copy of the final report required in connection with Condition 32 above shall be submitted within three months of the work being carried out to the Local Planning Authority and the Lincolnshire Historic Environment Record. The material and paper archive required as part of the written scheme of investigation shall be deposited with an appropriate archive in accordance with guidelines published in The Lincolnshire Archaeological Handbook.

Reason: To ensure satisfactory arrangements are made for the recording of possible archaeological remains in accordance with national guidance contained in Section 12 of the National Planning Policy Framework, 2012.

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Background papers:- Planning Application Working File

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**Lead Contact Officer**

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**Appendices attached to this report:**

Appendix A Plan A

- LEGEND**
- Application Boundary
  - Proposed Converter Station Site
  - Proposed Converter Station Zone
  - Indicative AC Cable Alignment
  - Indicative DC Cable Alignment
  - Local Planning Authority Administrative Boundary



REV.	DATE	DESCRIPTION
1	23/08/17	ORIGINAL ISSUE

FIGURE NO. VL\_170823\_NTS2.2  
 FIGURE TITLE UK ONSHORE SCHEME: PROPOSED CONVERTER STATION SITE, AC ROUTE AND PERMANENT ACCESS  
 1 of 1  
 NOTES

Date: 23/08/17  
 Scale at A3: 1:12,500

