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National Farmers' Union Comments: EGL 3 and EGL 4 Transmission Project Consultation – July 2024

The NFU represents over 45,000 members across England and Wales. In addition, we have 20,000 NFU Countryside members with an interest in farming and rural life. The NFU would like to make the following points in regard to the National Grid Eastern Green Link (EGL) 3 and 4 project, for consideration for the further development of the project.

1. **Consultation with Landowners** – The NFU notes that National Grid (NG) have appointed Ardent to liaise directly with affected landowners and make contact to verify publicly available information. The NFU would like to know whether there have been any in-person meetings with affected landowners yet. The NFU feel strongly that NG need to consult fully with landowners affected by any onshore apparatus and cable construction works.

The NFU would also like to see discussions regarding private agreements taking place as early as possible to enable these discussions to progress ahead of the submission of the DCO.

2. **Substation/Converter Station Locations** – The NFU understand that EGL 3 and 4 will connect to a Converter Station and DC Switching Station in Bilsby, before connecting to the grid via a new Substation in Walpole.

With all of these covering an area of approx. 280,000m² and requiring new access roads, NG should already be in full negotiations with the landowners affected by the proposed sites for both options, and if not, should make such engagement a priority.

3. **Cumulative Impact** – The NFU notes that the proposed onshore route runs close to other current or proposed infrastructure schemes in the Lincolnshire area, and would like to understand how NG propose to minimise the cumulative impacts of these schemes. This includes Grimsby to Walpole, Outer Dowsing Offshore Wind, Viking Link, Grantham to Bexwell pipeline, Viking CCUS, and Triton Knoll.

At the NFU's recent member meeting, several landowners raised that they were being impacted by multiple schemes, which they felt were not working together sufficiently, and were therefore causing significant disruption to their businesses and agricultural activities.

One member in particular has highlighted that their business is being hit by six different schemes, including Viking Link, Beacon Fen Energy Park, East Heckington Solar, South Lincolnshire Reservoir, Outer Dowsing Offshore Wind, and Grimsby to Walpole. It is expected that EGL 3 and 4

will also now impact them. Aside from the physical disruption to their business activities, the affected landowner is spending a significant amount of unpaid time dealing with all these projects.

While the Project Background Document (pg 13) states that some of the impacts with other NG Projects have been accounted for in the Grimsby to Walpole and North Humber to High Marnham projects' Strategic Options Report, the NFU believe that NG should be far more transparent in communicating these potential impacts and how they will work with affected farmers and landowners to reduce them.

The NFU would also like to know how NG are working with the operators of other projects in regard to their planning of this project, to be able to minimise day to day disruption to affected landowners.

4. **Onshore Cable Route** – The NFU would like to understand why more of the onshore cable route could not be located at sea, given there are 100km of onshore HVDC cable between landfall and the new substation in Walpole. Similarly, the NFU would like to understand why the project is unable to connect to a substation closer to the project's potential landfall, thus reducing the overall impact on farmers and landowners.

While we understand that the Project Background Document (pg 13) states that one of the projects could also connect at landfall to the transmission network near Bilsby, in East Lindsey, our understanding is this is still in early stages and may not go ahead.

5. **Cable Depth** – The NFU understands from the Soils and Drainage leaflet that the cable depth will typically be 0.9 meters from the protective tile to the surface of the soil. It is imperative that the cables are laid at a minimum depth of 1.2 meters to the top of the tile to ensure there is sufficient distance between the cables and farming operations to minimise risk. NG is very aware that the NFU does not consider 0.9 meters to be a satisfactory depth of soil above the protective tile.
6. **Cable Corridor** – The NFU understands that the construction corridor width will be 80m. We would also like to understand what the likely width will be for the permanent easement.
7. **Temporary and Permanent Access** – The NFU will be looking for NG to consult and agree with landowners any temporary and permanent access routes to the construction corridor, as well as compound sites where possible. We would like to see these highlighted on individual landowner plans for greater clarity.
8. **Discharge of Water** – Given the very wet winter of 2023/24, the NFU would like to understand how water will be discharged from the construction site, and whether there will need to be any attenuation ponds.
9. **Surface Apparatus** – We understand from information in the Corridor and Preliminary Routeing and Siting Study report that there are to be no link boxes/link pillars on the HVDC cables along the main route, but that there are likely to be link boxes/link pillars on the HVAC route between the Converter Station and the new substation in Walpole. We would like to receive confirmation on this.

The NFU would like to see that landowners are consulted on the location of any surface apparatus on the HVAC route and would like to receive a description/plan of a link pillar. On other schemes landowners have preferred link boxes to link pillars, as this minimises the impact on agricultural operations

10. **Heat Dissipation** – Heat dissipation, which can impact the land for the lifetime of the project, is a concern among farmers affected by the scheme. We have seen examples of heat dissipation on previous underground cable schemes, and they can have a significant impact on the crops growing in affected fields, such as crops growing at different rates, significantly complicating agricultural operations.

Please can you confirm the measures taken to reduce the impact of heat dissipation on the scheme?

11. **Biodiversity Net Gain** – The NFU would like to know how NG are intending to deliver Biodiversity Net Gain (BNG) on this project. On Page 50 of the Project Background Document, it states that NG are committed to achieving a biodiversity net gain of at least 10% across the project. It further states that “this may be delivered on site or off site through habitat creation and/or enhancement.”

The NFU would want to see discussions with landowners/farmers to ensure that any mitigation or BNG can be in areas that may be less productive or has the least impact on agricultural operations.

NFU does not support compulsory acquisition of any agricultural land for the purposes of delivering biodiversity net gain. If the project needs to acquire additional land to deliver such gain, then this should be acquired through voluntary negotiations.

We note that it is stated that the consideration of BNG will be included in the later stages of the project.

12. **Impact on Agricultural Businesses** – The NFU feels very strongly that the impact of the proposed scheme on agricultural businesses must be considered and mitigated. During the route selection process, consideration must be given to the impact on agricultural businesses and adjustments must be made to the scheme design where possible, to minimise the impact. A lot of the agricultural businesses grow a lot of vegetables 365 days of the year, which will be on multiple different contracts with supermarkets. The NFU would like to know how NG is going to address the impact of the scheme on vegetable cropping.

While the Soils and Drainage leaflet states that ALC land grades will be mapped across each affected land parcel, the NFU would like to know how much Best and Most Versatile Land (BMV) is likely to be taken for the scheme, on both a temporary and permanent basis.

The construction will cause significant disruption and the NFU would expect there to be consultation with farmers over practical matters, including access routes that may be needed by construction to join the haul road and compound sites. Some accommodation works may be required during the construction like temporary access across the working strip or water being relocated to mitigate the impact on agricultural businesses. The NFU will be expecting NG to hold one-to-one meetings with landowners to discuss accommodation works.

13. **Soils and Drainage** – The NFU is pleased to see that NG has set out a Soils and Drainage leaflet which states that soil and drainage will be prioritised from the start of the project, with soil and land quality assessments to be carried out. The NFU has particular wording that covers what should be included in a soil assessment to be set out in a pre-construction statement and will be looking for NG to agree to this and carry out this work for each individual holding. There is concern from landowners as to how the silt soil in the area will be treated.

The NFU again is pleased that it has been stated that NG is committed to providing land drainage which is equivalent to pre-construction access condition. The NFU understands that LDC will be carrying out the drainage surveys and designs and would like to know when this work will start. NG is aware that the NFU has particular wording which covers how a design should be drawn up, consulted on and agreed with the landowner. The NFU will be looking to agree this wording again in voluntary negotiations and for it to be included in a Code of Construction.

14. **Practical Undertakings** – the NFU has wording which covers practical issues which affect all landowners and occupiers on schemes and expects that this wording is either agreed in voluntary agreements or within a code of construction.

The NFU wording covers the following:

- a) Role of an Agricultural Liaison Officer
- b) Records of Condition
- c) Biosecurity
- d) Irrigation
- e) Agricultural Land Drainage
- f) Treatment of Soils
- g) Agricultural Water Supplies

15. **NFU Engagement** – We would like to engage further with NG on behalf of members that may be affected by the proposed scheme. The NFU would like to arrange a meeting with the project team as soon as possible to discuss and obtain further information on the points raised in this consultation response and to understand what work is happening on the proposed site at the present time.