

From: [REDACTED]
To: [East Anglia Two](#)
Cc: [Andrew Lucas](#)
Subject: EA2 - National Grid Electricity Transmission Plc
Date: 02 November 2020 18:31:51
Attachments: [EA ONE Written Representation - Neat 02.11.20\(207992852.pdf\(207994597.1\).pdf](#)
[Neat NGET response to ExA's FWQ's\(207988184.pdf\(207995539.1\).pdf](#)

Dear Sirs,

Please see attached:

1. Response to ExA's FWQ's on behalf of NGET, and
2. Written Representation on behalf of NGET,

National Grid do not anticipate attendance at Issue Specific Hearings (ISH1 or ISH2) or the Compulsory Acquisition hearing (CAH1) at this stage but reserve their position to attend future hearings will notify the ExA, should they feel it necessary to appear.

Kind regards

Abigail



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2 November 2020

THE INFRASTRUCTURE PLANNING (EXAMINATIONS PROCEDURE) RULES 2010

**EAST ANGLIA ONE NORTH OFFSHORE WINDFARM DEVELOPMENT CONSENT
ORDER**

EAST ANGLIA TWO OFFSHORE WINDFARM DEVELOPMENT CONSENT ORDER

WRITTEN REPRESENTATION ON BEHALF OF NATIONAL GRID PLC

REGISTRATION NO.20022367

REF: ADEA/2026502.000310



WRITTEN REPRESENTATION ON BEHALF OF NATIONAL GRID PLC

1 INTRODUCTION

- 1.1 National Grid Plc have made a relevant representation in this matter on 24th January 2020 in order to protect its position in relation to infrastructure and land which is within or in close proximity to the proposed Order Limits.
- 1.2 National Grid Plc does not object to the development proposed by the Applicant. The DCOs seek consent to deliver infrastructure that will be owned and operated by National Grid Electricity Transmission ("NGET"). That infrastructure includes a new NGET substation and the DCOs include flexibility for either a AIS or a GIS substation to be implemented should the DCOs be approved. NGET supports this flexibility as, the ability for NGET to choose which type of substation to implement will to assist NGET in complying with its statutory duty under Section 9(2) of the Electricity Act 1989 to "develop and maintain an efficient, co-ordinated and economical system of electricity transmission".
- 1.3 As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. As such NGET has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the Order Limits of the proposed development.
- 1.4 NGET's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the Order Limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted. NGET can confirm that it is liaising with the Applicant in relation to the protective provisions included within the DCOs to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. NGET will continue to liaise with the Applicant in this regard with a view to concluding matters as soon as possible during the DCO Examinations.
- 1.5 NGET own and maintain the electricity transmission network in England and Wales.. National Grid ESO operate the transmission network across the UK. NGET is required to comply with the terms of its Electricity Transmission Licence in the delivery of its statutory responsibility. Under Section 9 of the Electricity Act 1989, NGET have a statutory duty to maintain 'an efficient, co-ordinated and economical' system of electricity transmission.

2 NGET ASSETS

- 2.1 NGET has a high voltage electricity overhead transmission line located within close proximity to the Order Limits. Details of these assets are as follows:
- (a) Overhead Power Line 4ZX from 003 to 024, and
 - (b) Overhead Power Line 4ZW from 003 to 024
- 2.2 The overhead line forms an essential part of the electricity transmission network in England and Wales.
- 2.3 NGG does not have any Assets within the Order Limits.

- 2.4 In respect of all NGET infrastructure located within the DCO boundary, or in close proximity to the proposed project and associated works, NGET will require protective provisions to be put in place to ensure (i) that all NGET interests and rights including rights of access to Overhead Power Lines and other apparatus are unaffected by the power of compulsory acquisition, grant and extinguishment of rights and temporary use powers and (ii) to ensure that appropriate protection for the retained apparatus is maintained during and after construction of the project in accordance with the Protective Provisions and the relevant safety standards as set out in paragraph 5.
- 2.5 National Grid also require 24 hour access to all assets listed at 2.1 throughout the construction and operation of the Authorised Development and will liaise with the Applicant to ensure this is maintained.

3 **SUSTAINABLE DRAINAGE SYSTEM PONDS/BASINS**

- 3.1 As per Table 20.3 of the East Anglia ONE North Environmental Statement (document reference 6.1.20), we note that the Applicant retains the option to install further attenuation measures along the existing surface water flow route during the detailed design phase. The Applicant has committed to providing an additional 'surface water management SuDS basin' (currently identified as concept within Chapter 29 Landscape and Visual Impact Assessment, and in the OLEMS (document reference 8.7) to reduce water in-flow rates to the substation area and potentially reduce flood risk for the village of Friston, in addition to the Surface Water Drainage Strategy currently proposed.
- 3.2 Confirmation of the size, volume and location of this additional 'surface water management SuDS basin' will follow establishment of an appropriate catchment hydraulic model and the detailed design of the onshore substation and National Grid substation. As a result, the additional attenuation and wider catchment benefit associated with this proposed additional 'surface water management SuDS basin' is not therefore incorporated within this chapter and is therefore a worst-case scenario. NGET will contribute to the design of these further attenuation measures which must ensure that the operation of the proposed NGET infrastructure being consented is not compromised.
- 3.3 The Applicants and NGET will liaise during the detail design of the surface water management system which is on-going to ensure that the design satisfies the requirements of the Outline Operational Drainage Management Plan and to ensure that the operation of the authorised development (including the National Grid infrastructure and the Projects' onshore substations) are not compromised. NGET understands that the Applicant is currently preparing the Outline Operational Drainage Management Plan and that this will be reviewed by NGET prior to its formal submission to the examining authority during the examination.

4 **OTHER COMMENTS**

- 4.1 As the Project provides for a new National Grid substation and connection to the National Grid, National Grid would ordinarily expect the promoter to enter into a Side Agreement to secure those matters at paragraph 8(c), as well as securing that prior to construction the parties enter into an agreement to address transfer of benefits, an interface agreement in connection to construction and connection and acquisition of all necessary land rights. Negotiations are currently continuing between the parties in respect of these commercial matters. Once resolved and

agreed protective provisions are in place, National Grid will be in a position to remove their Representation.

5 NGET - REGULATORY PROTECTION FRAMEWORK

5.1 NGET have issued guidance in respect of standards and protocols for working near to Electricity Transmission equipment in the form of:

5.1.1 Third Party Working near National Grid Electricity Transmission equipment - Technical Guidance Note 287. This document gives guidance and information to third parties working close to National Grid Electricity Transmission assets. This cross refers to statutory electrical safety clearances which are used as the basis for ENA (TA) 43-8, which must be observed to ensure safe distance is kept between exposed conductors and those working in the vicinity of electrical assets, and

5.1.2 Energy Network Associations Development near Overhead Lines ENA (TS) 43-8. This sets out the derivation and applicability of safe clearance distances in various circumstances including crossings of OHL and working in close proximity.

5.1.3 Additionally, HSE's guidance note 6 "Avoidance of Danger of Overhead Lines", summarises advice to minimise risk to life/personal injury and provide guidance to those planning and engaging in construction activity in close proximity to Overhead Lines.

5.2 National Grid requires specific protective provisions in place to provide for an appropriate level of control and protection for retained assets and assurance that industry standards will be complied with in connection with works to and in the vicinity of their electricity assets.

6 PROPERTY ISSUES

6.1 NGET assert that maintaining appropriate property rights to support their assets and protecting these from Compulsory Acquisition and related powers in the DCO is a fundamental safety issue. Insufficient property rights would have the following safety implications:

6.1.1 Inability for qualified personnel to access apparatus for its maintenance, repair and inspection.

6.1.2 Risk of strike to buried assets/cable/overhead lines if development occurs within the easement zone which seeks to protect the cable/overhead lines from development.

6.1.3 Risk of inappropriate development within the vicinity of the assets increasing the risk of damage to the asset and integrity of the system.

7 PROTECTIVE PROVISIONS

7.1 National Grid seeks to protect its statutory undertaking, and insists that in respect of connections and work in close proximity to their Apparatus as part of the authorised development the following procedures are complied with by the Applicant:

(a) National Grid is in control of the plans, methodology and specification for works within 15 metres of any retained Apparatus; and

(b) DCO works in the vicinity of NGET apparatus are not authorised or commenced unless protective provisions are in place preventing compulsory acquisition of National Grid's land or rights or the overriding or interference

of the same. Any acquisition of rights must be subject to NGET's existing interests and rights and not contradict with or cut across such rights; and

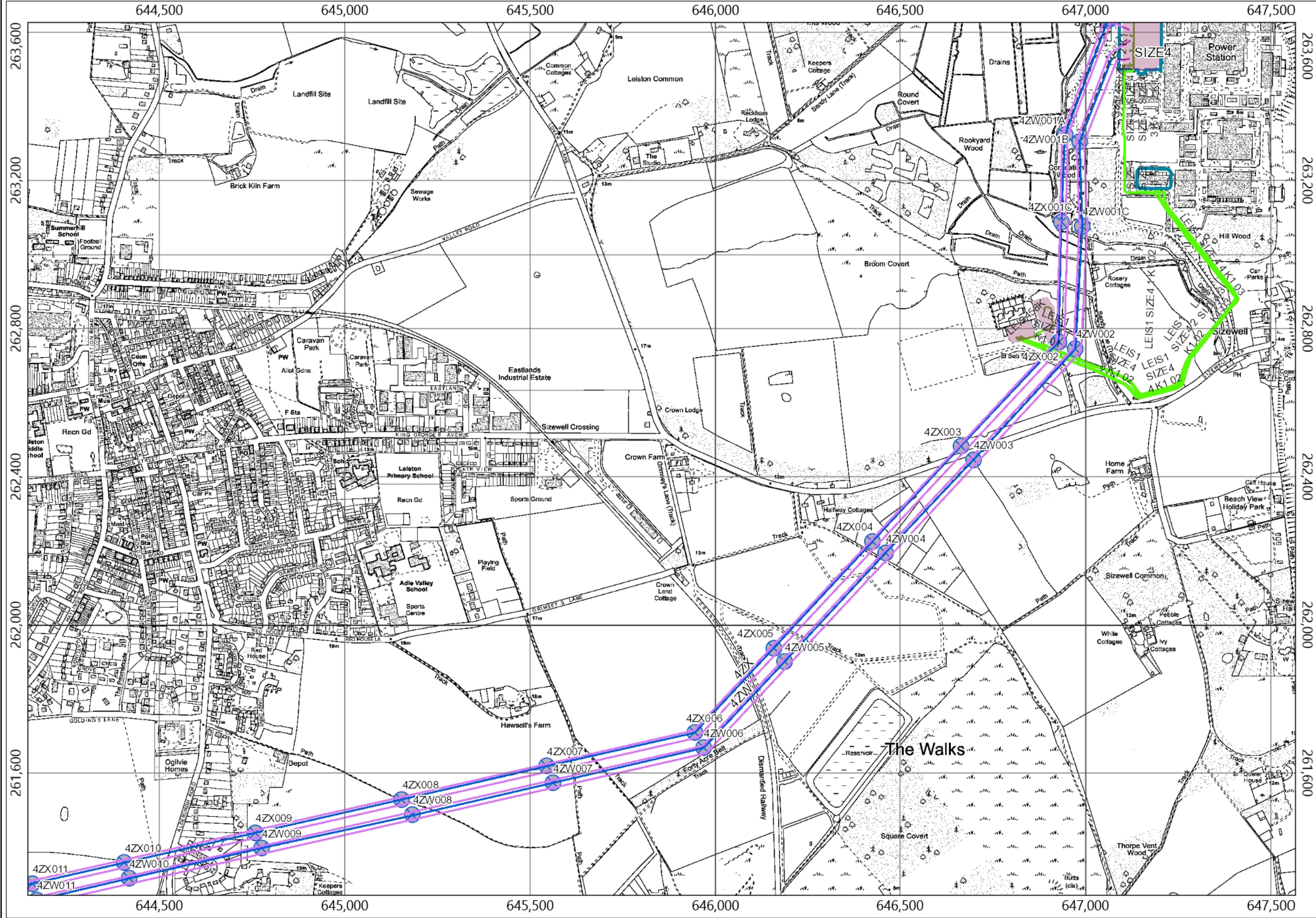
- (c) Appropriate surety and insurance provisions are in place to back up an uncapped indemnity to protect National Grid from any damage, losses or claims arising from the Authorised Development.

7.2 NGET reserves the right to make further representations as part of the Examination process but in the meantime will continue to liaise with the Applicant with a view to reaching agreement on all matters raised. It is understood that a good level of agreement has been reached in relation to the Protective Provisions although final sign off from the Promoter is awaited.

7.3 Should it not be possible to reach agreement with the Applicant, National Grid reserve the right to attend a Compulsory Acquisition Hearing or Issue Specific Hearing to address the required format of the Protective Provisions and any necessary amendments to the draft Development Consent Order. If this is necessary National Grid reserve the right to provide further written information in advance in support of any detailed issues remaining in dispute between the parties at that stage.

Appendix 1

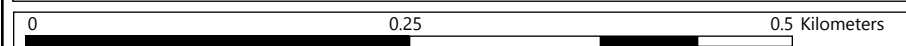
Asset Plans



Legend:

- Substations Commissioned
- Circuits
 - Commissioned
 - Decommissioned Group
 - Planned and Spares
 - OHL 400kV Commissioned
 - OHL 275kV Commissioned
 - OHL 132kV & Below Commissioned
- Towers Commissioned
- Buried Cable Commissioned
- Fibre Cable Commissioned
- Pilot Cable
- Pillar
- Oil Tank
- Link Box
- Gauge
- Joint Bay
- Cable Joint
- Oil Pipe
- Cooling Pipe
- Cooling Station
- RAMM
- Electric Land Ownership - Freehold
- Electric Land Ownership - Leasehold
- Cable Tunnel
- Gas Operational Boundary
- Gas Site Boundary
- Trial Hole
- Vantage Point
- Aerial Marker Post
- Pipe Crossing Point
- CP Test Post
- Transformer Rectifier
- Pipeline Crossing
- Sleeve
 - Nitrogen Sleeve
 - Other Sleeves
- Pipe Line Control Point
- Named Pipeline Section
- River Crossings

Notes:
EA2

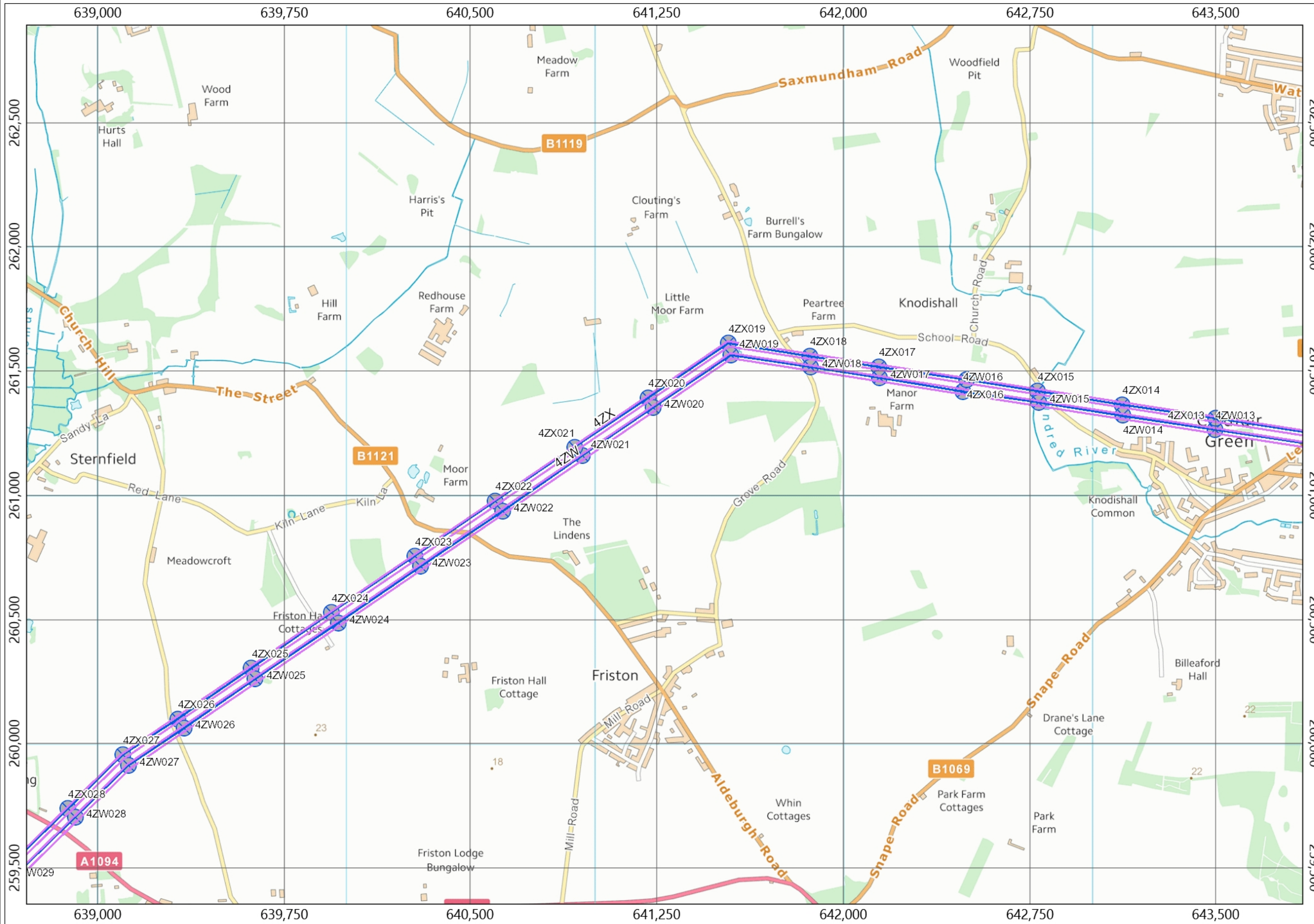


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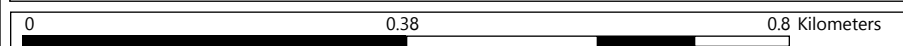
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Note: Any sketches on the map are approximate and not captured to any particular level of precision.



Legend:

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East Anglia ONE North Offshore Windfarm Development Consent Order and

East Anglia TWO Offshore Windfarm Development Consent Order

National Grid Electricity Transmission PLC (NGET) response to ExA's First Written Questions of the 12th October 2020

2nd November 2020



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Within the National Grid group there are a number of different business, operating separately, and each playing a role in the UK energy industry, transporting energy from producers to local network operators. NGET is an electricity network business and is a subsidiary of National Grid plc. It owns, maintains and manages the regulated electricity transmission network in England and Wales. NGET's network comprises approximately 7,211 kilometres of overhead line, 2,279 kilometres of underground cable and 347 substations.

NGET has had business separation obligations in its licence for a long time, requiring it to be separate from National Grid group businesses operating in the markets of Interconnectors, Carbon Capture and Storage and Offshore Transmission. With effect from 1 April 2019, following the creation of National Grid Electricity System Operator Ltd (NGESO), NGET's business separation obligations were updated to require separation from NGESO.

NGESO's role is to balance the system making sure supply meets demand and move high voltage electricity from where it is generated, such as a wind farm, through the energy system. It operates the system but is not responsible for the infrastructure (e.g. the pylons and cables) needed to carry the electricity. Using the infrastructure owned by three transmission companies (including NGET) the high voltage electricity is passed onto one of the fourteen Distribution Network Operators (DNOs) across the country. The DNOs own the local networks; they convert the electricity into a more manageable voltage suitable for domestic use and feed low voltage electricity through to homes and businesses. NGET and NGESO are legally separate companies operating within the National Grid group as separate businesses. Since separation in 2019, interactions between the two businesses are formalised and NGET is not in a position to respond to the Examining Authority on matters which are the responsibility of NGESO. We have detailed below those issues which NGET consider fall within the responsibility of NGESO. NGET have drawn the Examining Authorities First Written Questions to the attention of NGESO.

Those questions that were directly asked of National Grid are responded to below including to confirm where NGESO should more appropriately answer a question.

Question No.	Question	Response/Action
1.0.16	<p>Site selection: Friston grid connection point (Grove Wood)</p> <p>In paragraph 17 of Appendix 4.2 (RAG Assessment for Onshore Substations Site Selection in the Sizewell Area) [APP-443] you say that <i>"The onshore study area was extended westward following consultation with Suffolk County Council (July, 2017) to look further west by potentially crossing Aldeburgh Road. This area was previously excluded due to the potential interaction with residential titles."</i></p> <p>You also note that <i>"Aldeburgh Road would potentially act as a significant constraint, and that extension (of the study area) westwards would be counter to the achievement of economy and efficiency"</i> but nevertheless <i>"the onshore study area was proposed for extension."</i></p> <p>a) A substantial apparent reason for extending the study area westwards appears to have been that the Grove Wood pylon, being more substantial, might not require such extensive modification as other straight-through pylons to the east (ie towards Sizewell). Were there other technical reasons that bore on location selection?</p> <p>b) Given the impacts on residential property, economy and efficiency, and that the dDCO is principally intended to authorise the construction and operation of an Offshore Wind Farm, please explain why the substation site at Grove Wood was chosen and not a site further east?</p> <p>c) Could the length of the onshore cable route have been reduced, removing or reducing the need to cross the Leiston-Aldeburgh SSSI or the Sandlings SPA, and eliminate the need for the remainder of the onshore cable route to follow essentially the existing National Grid overhead lines all the way to Grove Wood, with all the associated impacts, particularly on residents and the natural environment?</p> <p>To the extent that responses to this question rely on any advice to the Applicant from National Grid that this location was broadly preferred by National Grid, the</p>	<p>a) NGET considers that the promoter is best placed to answer this question in relation to the reasons for extending the study area westwards. From a technical perspective NGET can confirm that a tension tower (pylon) as at Grove Wood is not a requirement for making a connection.</p> <p>NGET considers that questions (b) and (c) are questions that the promoter is best placed to answer.</p>

Question No.	Question	Response/Action
	Applicant is asked to document that advice. National Grid may comment at Deadline 2.	
1.0.17	<p>Site selection: Friston grid connection point In OFHs 1 – 2 (7 – 9 October 2020), a common emerging theme from oral submissions was that the Friston connection point location had perhaps been selected at least in part because it offered potential expandability.</p> <p>a) Do you understand this to be the case?</p> <p>It was suggested that a number of further grid connection offers have either been formally made or informally proposed by National Grid that could have the effect of bringing further transmission connections to this location.</p> <p>b) Please catalogue any additional connection offers that have been made on a formal or informal basis of which you are aware and submit the best available summary descriptions of the name, purpose, developer and effects of any additional connection proposals that might use this location.</p> <p>To the extent that responses to this question by the Applicant rely on any advice to the Applicant from National Grid, the Applicant is asked to document that advice. National Grid may comment at Deadline 2.</p>	<p>a) NGET considers that the promoter is best placed to address matters relating to the site selection process.</p> <p>b) This is a question for NGESO to respond to.</p> <p>NGET may comment at Deadline 2 as appropriate.</p>
1.6.1	<p>NSIP Definition of the Authorised Development Schedule 1 paragraphs 1 and 2 of the dDCO [APP-023] describes the authorised development as two NSIPs:</p> <ul style="list-style-type: none"> • A nationally significant infrastructure project as defined in sections 14 and 15 of the 2008 Act (the wind turbine generator array) with associated development to make all of the offshore and onshore grid connection works; and • A nationally significant infrastructure project as defined in sections 14 and 16 (electric lines) (for the connection point and National Grid substation works). Work No. 41 is the National Grid substation itself. 	<p>a) In relation to Work No. 41 EA1N and EA2 require two bays in total to provide a connection and that is all that is included in the promoter's DCO applications. See response to (b) below.</p> <p>b) (i) Yes, other connectees would require extensions to the National Grid substation (outside of Work No. 41 to provide additional bays) but these would need to be the subject of separate</p>

Question No.	Question	Response/Action
	<p>a) Is there an anticipated point in the period to 2030 at which the proposed development that is the subject of the East Anglia ONE North and the East Anglia TWO applications could in aggregate cease to be the predominant users of Work No. 41?</p> <p>b) If additional grid connections were to be made at this location, what are the implications for Work No. 41 and any directly related works:</p> <p>i. Will additional land be required;</p> <p>ii. Will additional development (physical infrastructure be required); and</p> <p>iii. If the responses to (i) and (ii) above are affirmative, can any clear projection be made as to the timing, extent and impact of these additional proposals?</p>	<p>consents.</p> <p>(ii) Yes, additional bays as explained above.</p> <p>(iii) Any response relating to connection agreements is for NGESO to provide.</p>
1.6.2	<p>NSIP Definition of the Authorised Development</p> <p>Are there circumstances in which the making of additional grid connections at Work No. 41:</p> <p>a) could result in Work No. 41 desirably becoming the subject matter of a distinct application for development consent, on the basis that it is no longer solely or even substantially required to connect the generating stations (Offshore Wind Farms) that are the subject of the East Anglia ONE North and East Anglia TWO applications; and</p> <p>b) might suggest that National Grid or a relevant subsidiary might more desirably or appropriately be the applicant for an NSIP primarily comprising Work No. 41 and relevant associated development?</p>	<p>a) and b) Substations themselves are not NSIPs and are generally consented via Town and Country Planning Applications, unless they are associated development to a NSIP. Work No. 41 only includes works required to connect EA1N and EA2 and it is appropriate that such works are included in the promoter's DCO applications as associated development.</p>
1.6.3	<p>Operation and Further Development of Work No. 41</p> <p>If Work No. 41 is constructed and becomes operational, subject to responses to ExQ1.0.17 – 18 and 1.6.1 & 2 above:</p> <p>a) will it be more accurate to characterise it as:</p>	<p>a) (i) As stated above, Work No 41 is required to connect EA1N and EA2 and it is therefore appropriate to characterise Work No 41 as a National Grid facility accommodating the generating</p>

Question No.	Question	Response/Action
	<p>i. a National Grid facility accommodating the generating station development proposed in these applications (the East Anglia ONE North and East Anglia TWO Offshore Wind Farms, or</p> <p>ii. as a general purpose substation facility operating as a National Grid transmission asset, providing transmission connections for multiple users and purposes; and</p> <p>b) do the powers proposed to be provided by the dDCO [APP-023] and the description of development in the ES and the Works Plans provide sufficient scope to build and operate the facility that National Grid currently envisage?</p> <p>c) If the answer to (b) is no, does National Grid envisage there needing to be a further application or applications for development consent (or amendments to these development consents if granted) required to form and deliver the intended use and development of this facility?</p>	<p>station development proposed in these applications (the East Anglia ONE North and East Anglia TWO Offshore Wind Farms).</p> <p>b)Yes.</p> <p>c). N/A as the answer to b) is yes.</p>
1.6.4	<p>Changes to the dDCO</p> <p>Are any changes to the dDCO as applied for [APP-023] anticipated as a consequence of a need to accommodate any development currently anticipated to be delivered as part of or to connect to Work No. 41, that is not development proposed in these applications or by these applicants?</p>	No.
1.14.1	<p>ES Assessment: Infrastructure and Other Users</p> <p>ES Chapter 17 (Infrastructure and Other Users) [APP-065] from paragraph 96 and at Table 17.14 identifies a limited range of range of interactions with other projects raising minor adverse residual impacts in construction and operation and no impact during decommissioning. Consideration is given to EDF energy infrastructure and to subsea cables.</p> <p>a) Is there any need to assess effects on National Grid transmission assets onshore?</p> <p>b) With reference to responses to questions in ExQ1.0 and 1.6 above and the</p>	<p>NGET consider the promoter should most appropriately answer these questions as they relate to the promoter's ES assessment work.</p>

Question No.	Question	Response/Action
	<p>possibility of other grid connections being made at Friston, are there any further interactions that require to be assessed?</p> <p>c) Does the ES conclusion that there are 'no pathways for cumulative impact' in paragraph 96 continue to hold good?</p>	