

SPR EA1N and EA2 PROJECTS



DEADLINE 4 – COMMENTS ON NATIONAL GRID GROUP SUBMISSIONS (NGET, NGESO & NGV)

Interested Party: SASES

IP Reference Nos. 20024106 and 20024110

Date: 13 January 2021

Issue: 2

Introduction

1. It has taken considerable time to review and analyse the comments of NGET and NGESO. Much of that time would have been saved had NGET and NGESO attended the hearings as requested by the Examining Authorities. Their non-attendance has increased the amount of time required by the other parties in reviewing and responding to their comments. This is reflected in the list of action points from ISH2 which runs to 13 pages. There is little doubt this list would have been much shorter had NGET and NGESO attended the hearings. SASES reserves its rights accordingly. However the point is more serious than a question of money. A residents' group such as SASES depends on people donating money and devoting their time, free of charge to addressing the issues raised. Therefore NGET's and NGESO's refusal to attend hearings and thereby increasing the work required has a disproportionate and exclusionary effect on residents' participation in the examination process given their limited resources, thereby undermining the fairness of the process.

SASES Post Hearing (ISH2) Submissions

2. SASES made detailed post hearing submissions in respect of site selection, cumulative impact and design. To avoid repetition of those submissions in its comments on the responses of NGET and NGESO at Deadline 3, NGET's and NGESO's responses should be read against SASES submissions in respect of site selection¹, cumulative impact² and design³. Similarly the Deadline 3 submission of NGV should be read

¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-003219-sases%20deadline%203%20Site%20Selection%20Subs%20151220.pdf>

² <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-003212-sases%20deadline%203%20Cumulative%20Impact%20Subs%20151220.pdf>

³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-003205-sases%20deadline%203%20Design%20Subs%20151220.pdf>

against SASES submissions in respect of cumulative impact.

National Grid Infrastructure – More than a substation

3. Whilst there are references to the National Grid “substation” in reality that is shorthand for the entirety of the National Grid NSIP being built at Friston. The extent of the National Grid NSIP is formally set out in paragraph 2 of Part 2 of Schedule 1 of the draft DCO. The principal permanent infrastructure which will result from the National Grid NSIP comprises:

Work number 38 - which comprises up to 3 cable sealing and compounds which includes overhead line gantries

Work number 39 - which comprises the replacement, upgrade and realignment works to the overhead pylons together with one new additional overhead pylon

Work number 41 - which comprises a new National Grid substation

Work number 34 - which comprises the new permanent access road (note the omission of the word “operational”)

4. NGET and NGESO should be asked to confirm that all their answers in respect of the National Grid substation apply equally to the entirety of the National Grid NSIP. This is particularly relevant in respect of the extent to which the National Grid infrastructure will be used for other projects and the substance of this development as a new connection hub for National Grid.
5. In this regard it should also be noted that even if only one of the EA1N or EA2 projects is built, there will be no reduction in size of the National Grid infrastructure – see answer to question 1 Agenda item 4, Bullet 4 . Again this indicates that National Grid contemplates that the connection hub at Friston will be used for other projects.
6. It is our understanding that although the National Grid substation may only be able to serve the EA1N and EA2 projects (although the position is unclear if only one of EA1N and EA2 is built and there is no reduction in size of the National Grid substation) the cable sealing ends and pylon realignment works will be able to serve other projects as will the permanent access road.

NGET’s involvement in the CION process

7. NGET makes much of the fact that the CION process is an NGESO process. However NGET has a very substantial (if not pivotal) role and interest in providing information and influencing the outcome of that process, since it will design and own the National Grid infrastructure that will result from that process and will have regulatory obligations in respect of it. Therefore NGET cannot distance itself from the outcome of the CION process and the decision-making which underlies it.

National Grid Corporate Structure

8. The division of responsibilities between NGET and NGESO only exacerbates the lack of clarity around accountability for the decisions relating to the National Grid NSIP. This is most graphically demonstrated by the response to action point 9 (iv) where “*NGESO refers this question to NGET*” and NGET states “*this question is more appropriately answered by NGESO*”.
9. A key area where this confusion needs to be clarified is in relation to the transfer of the benefit (subject to the related obligations/liabilities) of the DCO in respect of the National Grid NSIP. In this connection it should be noted that upon this transfer the applicants would no longer appear have any responsibility under the DCOs under Articles 5(5) and 5(6).

Structure of SASES comments

10. Generally SASES relies upon its post hearing submissions following ISH2 as referred to above. However SASES has made a number of specific comments by reference to the table of responses provided by NGET and NGESO and these are set out in Appendices 1 and 2 respectively.

NGV's Deadline 3 submission

11. In relation to NGV's deadline 3 submission SASES relies upon its post hearing (ISH2) submission in relation to cumulative impact. SASES would merely point out that NGV admits that its interconnector proposals are sufficiently advanced so that it can undertake community consultation in late summer this year. This is a mere matter of months after the end of the examination processes and before the Secretary of State will make a decision on the National Grid NSIP, EA1N and EA2. It is as if NGV is attempting to time the development of its proposals to avoid the need for a thorough cumulative impact assessment; a result which is manifestly in the corporate interests of SPR, NGET, NGESO and NGV but not in the interests of the environment or the local community.
12. In the context of cumulative impact, spare a thought for the community given that NGV's community consultation will take place with the same community which:
 - a. has just undergone an extensive multi-year consultation exercise with SPR and is currently engaged with the related examination process;
 - b. has just undergone an extensive multi-year consultation exercise with EDF in respect of Sizewell C and which will be engaging in the examination process later this year.

APPENDIX 1 – SASES COMMENTS ON NGET RESPONSES

Compulsory Acquisition Hearing – ExA’s Agenda Questions

Qu. No.	Agenda Item	Question	Response	SASES comment
1.	-	<p>NGET to review the online recording and to respond in writing to questions <u>raised of or relating to them</u> in light of discussions that occurred. NGET feel that the key issue following review of the online recording was the “Extent to which the development consent for NGET elements (and consequentially the land take) are required only to facilitate the connection of EA1N and EA2 or whether consent is also sought for works to facilitate future connections”.</p>	<p>The short answer to this question is that the development consent order application only seeks consent for those works necessary to provide a connection for EA1N and EA2 to the National Electricity Transmission System (NETS). The land take that NGET will require from the Promoter will only facilitate the connection of EA1N and EA2. NGET will not require the Promoter to provide to NGET any land or rights for any future connections. In order to seek to provide some more detail around this issue NGET have also responded in a longer response in the next three rows below, responding to the Agenda items for the CA Hearing.</p>	<p>Whilst the DCO application may only seek to consent the works necessary to provide connection for EA1N and EA2, those works will in fact facilitate the connection of other projects not least because:</p> <ul style="list-style-type: none"> - the requirements of the Electricity Act will drive the site selection of the Friston connection point - the new National Grid connection infrastructure at Friston e.g. cable sealing ends, gantries, pylon realignment, access roads, drainage infrastructure and the availability of land particularly if a GIS substation is built
1.		<p>Agenda item 4. Bullet 4 - The National Grid connection substation, including the need for land and rights in respect of both this and the other East</p>	<p>The maximum footprint of the National Grid substation utilising AIS technology when operational is 44,950m² and would be up to 145m (wide) x 310m (long). The maximum footprint of the National Grid substation utilising GIS technology is 16,800m² and would be up to 140m (wide) x 120m (long). The size of the National Grid substation is dictated</p>	<p>In terms of the size of the National Grid infrastructure including the substation, there is currently no independent means to verify this, we have to simply take National Grid’s word for it which is</p>

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		Anglia application together.	<p>by electrical safety clearances and the switchgear technology used.</p> <p>The maximum height of permanent outdoor equipment within the National Grid substation is up to 16m above finished ground level for both AIS and GIS technologies. The maximum height of buildings within the National Grid substation is 6m (for AIS technology) or 16m (for GIS technology).</p> <p>Detailed design work has not been carried out at this stage to inform the specific layout within the National Grid substation and as such the dimensions provided are based on maximum (reasonable worst case) anticipated requirements. Detailed design would be carried out by NGET's contractors, following the award of a contract and prior to work on site commencing. Details will be submitted to the Local Planning Authority in accordance with the relevant requirements of the DCO. In any event, based on the conceptual design undertaken and NGET's experience of previous projects, NGET consider it unlikely that the detailed design will significantly change the required substation footprint and therefore the land take required.</p> <p>Cable sealing end compounds are required to facilitate connection of the National Grid substation to the existing overhead line circuits and may be constructed prior to and/or subsequent to, the overhead line diversion works. Cable sealing end compounds typically comprise equipment including gantries, busbars, connectors post insulators, surge arresters and earth switches.</p> <p>Up to three cable sealing end compounds are required to connect the National Grid substation to each of the overhead line circuits, one of which one will include</p>	<p>difficult as they did not even attend the hearing which dealt with design matters. Please note that in the draft DCO there are no requirements as to the footprint of the cable sealing ends or pylons.</p> <p>It is unclear what will happen to the land that National Grid will not use if it chooses GIS technology. National Grid should be required to make the decision of AIS or GIS ahead of the DCO being granted so that the DCO can reflect reality. Further it should be stated in the DCO that any subsequent change from GIS to AIS or vice versa should be a material change.</p> <p>Given the sensitivity of the location it is not acceptable that design work has not been carried out to minimize the harm to the environment ahead of the DCO being granted. See SASES post hearing</p>

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			<p>a circuit breaker, disconnectors and current/voltage transformers for protection purposes, and two sets of connections (downloads) from the overhead line pylon.</p> <p>The final micro-siting of the cable sealing end compounds will be identified during detailed design and will be influenced by the overhead line realignment final design and any constraints, including field boundaries.</p> <p>NGET will require the freehold transfer of the land required for the substation and cable sealing end compounds, the access rights (for construction and permanent operation) and the necessary land and/or rights for the overhead line works and access thereto alongside temporary construction rights. Any land and rights for any future substation extension would be sought in conjunction with any future consent application at the relevant time and are not sought by NGET from the Promoter.</p>	<p>submissions on design.</p> <p><i>With reference to 'a circuit breaker, disconnectors and current/voltage transformers for protection purposes' an examination of the latest OLMP (Figure 3 of [REP3-030]) shows these as associated with the northern-most circuit of pylon line 4ZX.</i></p> <p>As no such equipment is proposed for the other three other OHL circuits fed from the otherwise symmetrical proposed new NGET substation it is a reasonable presumption that they are not part of the EA1N or EA2 projects.</p> <p><i>Will NGET therefore please explain why this additional equipment is required at this site, and not elsewhere, what its underlying function is as part of the 4ZX pylon line, and why it should form part of the NSIP promoted by the EA1N and EA2 projects?</i></p>

1.		<p>Agenda item 4. Bullet 4 - The National Grid connection substation, including the need for the land and rights in circumstances where only one project is consented.</p>	<p>Irrespective of whether AIS or GIS technology is adopted, only the customer connection bay (which is approximately 1,100 sqm for AIS) for EA2 will not be required if only EA1N goes ahead. For GIS, the connection bays are included within the building footprint, however, in both cases the size of the substation envelope will remain the same as will the NGET infrastructure because both the existing overhead lines (comprising four circuits in total) will still need to be teed into the new proposed sub-station which, due to its component parts, will remain</p>	<p>This would indicate that there is a great deal of flexibility (both up and down) in terms of the number of connections which can be made at the National Grid infrastructure which again indicates that the construction of this infrastructure will facilitate future connections.</p>
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Qu. No.	Agenda Item	Question	Response	SASES comment
			<p>the same size whether either or both projects are consented. The separate connection bays which relate to either EA1N or EA2 only are very small elements of the overall substation layout and therefore do not reduce the extent of the footprint required.</p> <p>A separate note on the NGET substation component parts is appended to this response, however, design optimisation and the final equipment to be utilised will be determined during the detailed design of the substation.</p> <p>The above response is the same if only EA2 goes ahead.</p> <p>Accordingly, the land and rights sought remain the same.</p>	
1.		<p>Agenda item 4. Bullet 4 - The National Grid Connection substation, including the need for land and rights in respect of other projects with agreements to connect at Friston.</p>	<p>The NGET Infrastructure is required to connect EA1N and EA2 only. Any additional connections to the substation in the future would require an extension that would need to be consented separately.</p> <p>NGET will require the freehold transfer of the land required for the substation and cable sealing end compounds, the access rights (for construction and permanent operation) and the necessary land and/or rights for the overhead line works and access thereto alongside temporary construction rights. Any land and rights for any future substation extension would be sought in conjunction with any future consent application at the relevant time and are not sought by NGET from the Promoter.</p>	<p>It should be noted that the only extension required would be to the substation alone not the remainder of the National Grid infrastructure.</p> <p>As above the matter of the excess land if GIS technology is used is not addressed.</p>

Qu. No.	Agenda Item	Question	Response	SASES comment
2	Item 3	(i) Please respond in writing to points raised under item 3 in relation to linked NSIP's and the justification for the applicants to be applying for the overhead line NSIP's.	<p>(i) Paragraph 4.9.2 of NPS EN-1 confirms that the Planning Act 2008 aims to create a holistic planning regime so that the cumulative effect of different elements of the same project can be considered together and, accordingly, the Government envisages that wherever possible, applications for new generating stations and related infrastructure should be contained in a single application or in separate applications submitted in tandem which have been prepared in an integrated way. In this case the Promoter was keen to take the approach of a single application in accordance with national policy.</p> <p>The applications therefore adopt an approach advocated by national policy and, indeed, such an approach is not unusual in NGET's experience, with many projects both pre and post the 2008 Act seeking to consent NGET infrastructure, be that new or extended substations or overhead line (OHL) modifications associated with grid connections.</p> <p>Post-2008 Act the following projects are examples of this approach:</p> <ul style="list-style-type: none"> • Sizewell C DCO Application – includes a new NGET substation and realignment of the existing OHL into the site incorporating a new Pylon. • Aquind Interconnector DCO Application – includes an extension to NGET Lovedean Substation. • Neuconnect Interconnector Planning Application – includes a new NGET 	<p>There is no evidence that the examples given are in any way comparable. In fact it would appear they are not comparable.</p> <p>For example in these projects:</p> <p>a) do the DCOs give National Grid the right to choose either AIS or GIS technology post consent?</p> <p>b) is the National Grid infrastructure in these projects an NSIP in its own right?</p> <p>c) have connection offers for other projects been made for the project locations?</p>

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			<p>substation and sealing end compound (SEC).</p> <ul style="list-style-type: none"> • Millbrook Power DCO Application – includes a new NGET substation and modifications to the existing OHL. • Vanguard DCO Application – includes an extension to NGET’s Necton Substation and modifications to the existing OHL. • Boreas DCO Application – includes an extension to NGET’s Necton Substation and modifications to the existing OHL. • Lower Thames Crossing DCO Application – includes the realignment of five separate sections of OHL, one of which is an NSIP due to being over 2km in length, and the realignment of two underground gas feeder mains, both of which are considered to be NSIPs due to the potential significance of environmental effects. 	<p>d) are they for new connection infrastructure in a greenfield location where there is no pre-existing connection infrastructure?</p>
2	Item 3	(ii) Please address possible circumstances in which additional connection proposals (over and	(ii) Any future third parties connecting at Friston would require extensions to the NGET substation (outside of Work No. 41) to provide additional connection bays. The extensions would also likely require the following equipment: cable terminations/sealing ends, current and voltage transformers, surge arrestors, busbars and disconnectors which would be the subject of future applications for consent. In relation to Work No. 41, EA1N and EA2 require two bays to provide a connection and that is all that is included in the promoter’s DCO applications.	<p>NGET has not answered the question.</p> <p>NGV has already confirmed that the National Grid substation (<u>but not the remainder of the National Grid infrastructure</u>) will need to be expanded by 3 acres for each of</p>

		<p>above the currently proposed developments) may become additional and/or dominant users of the transmission system connection;</p>		<p>Nautilus and Eurolink projects as set at 5 page of NGV's FAQ document⁴.</p> <p>Within that document it is also stated that "<i>NGET has indicated that provision for the land required to extend its substation at Friston has been provided for as part of ScottishPower Renewables proposals for East Anglia ONE North (EA1N) and East Anglia TWO (EA2).</i>"</p> <p>NGET has also indicated here that it is only the substation which would need to be extended not the remainder of the National Grid infrastructure.</p> <p>In this context it should be noted that the only access road to the site (work no. 34) could form part of the National Grid NSIP <u>not</u> the Applicants' NSIPs</p>
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⁴ <https://www.nationalgrid.com/document/132456/download>

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		(iii) and that further land may be required for this to occur.	(iii) As above, any additional connections to the substation would require an extension and would need to be consented separately. The location of extension areas would be considered by the relevant Promoter at the appropriate time in liaison with NGET and would be considered in their site selection process before being consented through a Development Consent Order or equivalent process. NGET would not seek the transfer from the Promoter of any areas that could be required for future extensions on a permanent basis.	

Issue Specific Hearing 2

No.	Agenda Item	Question	Response	SASES comment
3	Overarching	<p>Information about the possible transmission systems connection at Friston and the absence of NGET/NG ESO from the hearing. ExA want a full understanding of the Site Selection process for Friston and the extent to which National Grid group requirements had been considered by the Applicants.</p> <p>Also respond in writing to questions raised of or in relation to them in light of the discussions that occurred.</p>	<p>As set out in NGET's response to Item 3(i) above, the approach of promoters including NGET infrastructure in their applications is not unusual. In this case it was the Promotor's preference to seek to consent all the NGET infrastructure required to connect its projects in accordance with NPS EN-1. NGET supported this process by initially providing design parameters for the infrastructure required to connect the projects to inform the site selection process. Further conceptual design work was then undertaken to inform the Promoter's environmental assessment work.</p> <p>NGET's response to the issues raised in discussions at the hearings are set out in the next three rows in respect of agenda items 2(d), 3(a) and 3(b).</p>	<p>As noted above there is no evidence that the examples given are comparable.</p> <p>In relation to site selection for the National Grid NSIP in the Leiston area see SASES post hearing submissions on site selection</p>

	<p>2(d)</p>	<p>Under Agenda Item 2(d) the examining authority asked for:</p> <p>(i) the clearest position of public knowledge (not commercially confidential information) around projects proposed to connect in the Leiston Area.</p>	<p>(i) This is a question more appropriately answered by NGESO and is also asked under question 9(ii) below.</p>	<p>NGET does not explain why this question is more appropriately answered by NGESO not least because NGET has a direct role in the CION process.</p> <p>Also NGET provides the design parameters for future projects therefore it must have knowledge around projects proposed to connect in the Leiston area.</p>
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		<p>(ii) There was also discussion around whether a connection in the Leiston Area means Friston.</p> <p>(iii) Also, why Friston was chosen (including why a brownfield site was not selected).</p>	<p>(ii) This is addressed in response to question 8(ii) below.</p> <p>(iii) In relation to this point, the location of the connection offer is addressed via the CION process and site selection within the Leiston area was carried out by the Promoter.</p>	<p>In connection with this response the following points should be noted.</p> <p>a) NGET is directly involved in the CION process</p> <p>b) it is not credible that NGET had no involvement in the site selection within Leiston area.</p> <p>Accordingly NGET is in a position to provide an answer to this question and has failed to do so.</p>
	3(a)	<p>The choice to make a new onshore connection, as opposed to utilising/expanding existing connections at Bawdsey/Bramford [or Sizewell] or creating new connections elsewhere.</p>	<p>The CION process is the responsibility of NGESO.</p> <p>A similar question is asked under 8(i).</p>	<p>Whilst NGESO may "lead" the CION process, as stated above NGET is directly involved in the CION process.</p> <p>Accordingly NGET is in a position to provide an answer to this question and has failed to do so.</p>

	<p>3 (b)</p>	<p>The specific need for, and justification of, locations of landfall at Thorpeness and substations/transmission Systems connections, including the proposed National Grid substation and connections to the grid at land north of Preston. To include details of the strategic decision making process for the proposed location and their generation</p>	<p>In relation to issues discussed in connection with this agenda item, we are not aware of any specific unanswered questions for NGET, although NGET are happy to answer any further questions that the ExA may have. NGESO can more appropriately address questions relating to connections offered in the Leiston area. The site selection process was carried out by the Promoter, within the parameters of the connection offer and the exact connection location, substation location and landfall location are decisions made by the Promoter as a result of their site selection processes. The Promoter is therefore in the best position to explain their site selection process.</p>	<p>As stated above it is not credible that NGET had no involvement in the site selection within the Leiston area.</p> <p>Accordingly NGET is in a position to provide an answer to this question (at least in part) and has failed to do so.</p>
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No.	Agenda Item	Question	Response	SASES comment
		capacities – why were the sites chosen, and in what order?		
8		(i) Explain why the proposed connection to transmission system at Friston was chosen and analysis of adverse effects that took place to inform the decision from the CION and related RAG (Red, Amber, Green) processes.	(i) The CION process identified the Leiston area and the Promoter's site selection process identified the site at Friston, with NGET providing technical input as referred to in the response to question 3 (first row Issue Specific Hearing response above).	(i)NGET has failed to answer this question. It has merely referred to the process. It has not provided reasons.

	<p>(ii) Explain why, if there is a need for a strategic connection hub in the Leiston area accommodating multiple connections in addition to the connections for the proposed developments, entities in the National Grid Group of companies have not taken the lead in identifying its location and seeking a planning approval/development consent in their own right.</p>	<p>(ii) NGET is not promoting a strategic connection hub in the Leiston Area. NGET is constrained by the statutory obligations and the regulatory framework that it works within, as created by existing legislation. NGESO in conjunction with NGET must respond to connection requests in accordance with the CION process, which is more appropriately explained by NGESO. The Leiston area was identified for the connection of the EA1N and EA2 offshore wind farms through the connection application and CION process that NGESO leads.</p> <p>In this instance the Promoter expressly wished to consent the National Grid substation as part of its DCO applications and embarked on that process before the NGV interconnector proposals came along.</p>	<p>(ii) It is noted that NGET has not denied there is a need for a strategic connection hub in the Leiston area.</p> <p>Whilst NGET is not <u>formally</u> promoting a strategic connection hub in the Leiston area that is the effect of these proposals. The constraints to which NGET refers (economy, efficiency and coordination under the Electricity Act) will de facto result in Friston becoming a strategic connection hub given the investment in pylon realignment, cable sealing ends, the presence of existing substation infrastructure, the availability of land etc.</p> <p>Whilst NGESO may lead the CION process NGET has a direct involvement in that process.</p> <p>As has been established EA1N and EA2 were originally to connect Bramford and this was the output of the CION process which was subsequently revised.</p> <p>The timing of when "<i>the promoter... embarked on that process</i>" needs to be clarified having regard to when NGET and NGESO first became aware that interconnector projects with Belgium and the Netherlands might be proposed. It is unclear what "before the NGV interconnector proposal came along" means.</p> <p>In addition regardless of possible interconnectors, NGET and NGESO were and remain extremely well aware of the development of offshore energy projects in the North Sea which given the transmission infrastructure from Sizewell to Bramford would lead to those locations being potential options for future connection offers.</p>
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			<p>The EA1N and EA2 projects only seek consent for the necessary apparatus to facilitate a connection at Friston. NGET is under statutory obligations to provide an efficient, co-ordinated and economic transmission system, as such, future connections at locations with existing infrastructure cannot be ruled out, although they would be subject to obtaining all necessary consents at the appropriate time.</p> <p>All connection offers made by NGESO are subject to consents being granted and therefore do not pre-judge the acceptability of the connection locations. Promoters must carry out their own site selection process and secondly they must obtain all necessary consents from a planning and environmental perspective, which provides the necessary safeguards to ensure this is considered in full in relation to any future proposal There is no certainty of consent within the NGESO processes.</p> <p>Government and the Regulator expect the planning process to determine if a proposal is acceptable or not in planning and environmental terms. In this instance the Promoter has elected to lead the activity associated with that process.</p>	<p>Whilst the EA1N and EA2 projects may only seek consent for the necessary infrastructure to facilitate a connection at Friston, it is noted that NGET admit that this infrastructure will facilitate further connection offers at Friston.</p> <p>As a practical matter the pylon realignment and the presence of cable sealing ends will also facilitate future connections at Friston.</p> <p>(iii) It is difficult to understand the point which NGET is</p>

		<p>(iii) In the event that the decision to connect at Friston was made solely or principally by the Applicants, explain your view of the proposal. Does leadership site selection and initial development by the applicants raise any relevant implication or risks for your strategy and purpose in seeking to develop a transmission connection location for multiple uses at or around Leiston.</p>	<p>(iii) As stated above, the site selection process identifying Friston, was carried out by the Promoter with input from NGET. The Development Consent Order (DCO) is personal to the Promoter. The consent under it can only be utilized by NGET in accordance with the transfer of benefit from the Promoter to deliver the connection needed by the Promoter, in the Promoter's timescales and in accordance with the discharge of the Promoter's requirements. It is not a standalone planning consent that NGET can implement without the Promoter's consent or absent the Promoter's scheme. In agreeing that the Promoter's DCO included the NGET substation and connection works to the OHL, NGET accepted this position. The substation can therefore only be provided in conjunction with EA1N and EA2, if consented. The position in future in relation to subsequent connections depends on future promoters obtaining relevant consents that may be similarly constrained. This DCO does not therefore consent a strategic connection hub for NGET, it consents a connection to the NETS for EA1N and EA2, which is constrained by the transfer of benefit provisions and the Requirements in the DCO.</p>	<p>seeking to make here. The DCO is not "personal to the Promoter", as all or any of the benefit of the DCO can be transferred subject to the restrictions, liabilities and obligations under the DCO (see article 5 (5) of the DCO)⁵. Furthermore once the benefit is transferred the Promoter has no liability in respect of the benefit transferred (see article 5(6)(b) of the DCO).</p> <p>In addition those parts of the DCO which relate to National Grid specifically will no doubt have been determined by National Grid.</p> <p>It needs to be clarified under the DCO whether the NG NSIP can be developed even EA1N and EA2 are not developed.</p> <p>The point is not whether the DCO grants consent for a new National Grid connection hub but rather that the development of the National Grid NSIP under the DCO facilitates Friston becoming a connection hub which it will, given the regulatory and practical reasons why that will happen as referred to above.</p>
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⁵ [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-003262-3.1%20EA1N%20Draft%20Development%20Consent%20Order%20\(Tracked\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-003262-3.1%20EA1N%20Draft%20Development%20Consent%20Order%20(Tracked).pdf)

No.	Agenda Item	Question	Response	SASES comment
9	2(a) to 2(e)	<p>(i) Explain the planning assumptions in relation to (a) a connection at Leiston; and (b) the development of a strategic connection hub in the Leiston area in the next 10 years.</p> <p>(ii) Outline potential projects requiring connection and their planning and</p>	<p>(i) (a) the question in relation to the planning assumptions included in the CION process are more appropriately answered by NGESO.</p> <p>(b) please refer to the answer above to 8(ii).</p> <p>(ii) this question is more appropriately answered by NGESO.</p>	<p>(i)(a) Why?</p> <p>(i)(b) Please see comments above in relation to 8(ii)</p> <p>(ii) Why?</p>

No.	Agenda Item	Question	Response	SASES comment
		<p>legal status (including Eurolink, Five Estuaries, North falls and SCD1 and 2),</p> <p>(iii) Explain the information held on the NGV website appearing to commit to connecting several projects to a connection at Friston.</p> <p>(iv) Confirmation of location of the proposed Leiston Connection point. Is it one and the same as the Applicants proposed connection point at Friston? If more than one point of physical connection is envisaged then please make this clear.</p>	<p>(iii) questions relating to the content of the NGV website are more appropriately answered by NGV.</p> <p>(iv) this question is more appropriately answered by NGESO.</p>	<p>(iii) This statement is incorrect and as some of the information relates to the expansion of the National Grid substation which is required to connect the interconnector projects. That information can only have come from NGET.</p> <p>(iv) Why?</p>

	<p>(v) Please identify where there is sufficient information to allow a cumulative impact assessment to be undertaken of adverse effects of projects likely to be planned to be connected at Friston. When will this assessment be carried out?</p> <p>Reference to oral contributions by NGV on agenda item 2 will assist</p>	<p>(v) The development of a connectee's proposals post CION/connection process isn't a matter for NGET or NGESO to comment on unless individual promoters have themselves put material into the public domain.</p>	<p>(v) NGET seem to be in denial as in this case a substantial component of the "connectee's proposals" is a National Grid NSIP the details of which will have been provided by NGET as will the requirements for expansion of the National Grid substation referred to in the materials published by NGV in particular the FAQ document referred to above. As set out in SASES post hearing submissions on cumulative impact, given the relationship between the various National Grid divisions and the promoters of offshore projects these parties can prevent information coming into the public domain and in an attempt to prevent a cumulative impact assessment.</p>
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No.	Agenda Item	Question	Response	SASES comment									
12		<p>Specification and capacity of the Existing Transmission system OHL's out of Sizewell. Please explain:</p> <p>(a) The current specification and capacities of existing overhead transmission lines (OHL's) at Sizewell,</p> <p>(b) How this compares with other typical OHL transmission system alignments,</p> <p>(c) Extent to which new generating capacity can be added to this OHL,</p>	<p>(a) The current existing OHLs are of L6 tower construction supporting 4 x 400m² ACSR conductor systems operating at 400kV. The current circuit ratings are tabulated below:</p> <table border="1" data-bbox="824 644 1525 826"> <thead> <tr> <th></th> <th>Winter</th> <th>Summer</th> </tr> </thead> <tbody> <tr> <td>Pre fault (MVA)</td> <td>2335</td> <td>1863</td> </tr> <tr> <td>Post fault (MVA)</td> <td>2779</td> <td>2217</td> </tr> </tbody> </table> <p>(b) The existing OHLs consist of a typical tower type and conductor system used for operating at 400kV. However, it should be noted that whilst towers and conductors are typical, required circuit thermal ratings differ on OHL's depending on the required circuit ratings.</p> <p>(c) No reconductoring works of the existing OHL's would be required just to connect</p>		Winter	Summer	Pre fault (MVA)	2335	1863	Post fault (MVA)	2779	2217	
	Winter	Summer											
Pre fault (MVA)	2335	1863											
Post fault (MVA)	2779	2217											

No.	Agenda Item	Question	Response	SASES comment
		<p>including from the Sizewell C generating station without requiring upgrade/replacement</p> <p>(d) The anticipated lifetime</p>	<p>EA1N and EA2. Any future connections required by other projects would need to be assessed and considered separately.</p> <p>(d) Towers are designed, fabricated and treated for a minimum design life of 80 years. The minimum design life for conductor systems is 60 years.</p>	<p>In this context it should be noted that there is a proposal to "re-conductor" the existing pylons to increase transmission capacity. See SASES list of related projects submitted at deadline 3⁶. The existence of this project indicates an intention to make further connection offers in the Leiston area where Friston given the NG infrastructure that will be built is the likely connection point.</p>

⁶ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-003214-sases%20deadline%203%20ish2%20action%20points%20151220.pdf>

16		Reference was made in the hearings (by Counsel for SASES) to the duties on licensed bodies under s9 and sch 9 of the Electricity Act 1989 (as amended) please set out your response to these duties in terms of their applicability and (where applicable) your siting and design response to them when making siting and design decisions relating to	As a holder of a transmission licence NGET is required to comply with the general statutory duties in s9 of the Electricity Act 1989 to “develop and maintain an efficient, co-ordinated and economical system of electricity transmission and to facilitate competition in the supply and generation of electricity”. The Promoter has addressed the regulation of the industry and the statutory duties in respect of transmission in their Regulatory Context Note (REP2-003). In light of the Promotor’s grid connection application and subsequent CION process, NGET provided support and input to the CION process. When an offshore wind farm is proposed, the statutory duties to develop efficient, co-ordinated and economical proposals whilst also having regard to the environment apply and all three parties – NGESO, NGET and the Promoter, feed into the assessment that is	See SASES Comments on the Regulatory Context Note made at Deadline 3 ⁷ .
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⁷ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-003204-sases%20deadline%203%20comments%20on%20deadline%202%20submissions%20151220.pdf>

No.	Agenda Item	Question	Response	SASES comment
		<p>onshore infrastructure.</p> <p>Specifically provide your response in relation to Schedule 1(1) and equivalent policies in NPS EN-5.</p>	<p>led by NGESO. As outlined in answer to questions 2 Item 3(i) and 8 (ii), the Promoter has elected to consent the NGET connection works along with their own connection infrastructure and this is not uncommon. NGET and the Promoter, however, have had continued ongoing engagement regarding the specification of the NGET works necessary to connect the Projects. In addition, the Promoter has reported back to NGET and explained their approach to matters such as strategic landscaping. Again, this type of arrangement is typical where a promoting party is taking overall responsibility for the consenting of such works.</p> <p>The obligations in Schedule 9 of the Electricity Act 1989 place environmental duties on licence holders when formulating relevant proposals (this includes proposals for the installation of an electric line and execution of other works in connection with the transmission of electricity). The environmental duties are to:</p> <p>(a) have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and</p> <p>(b) shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.</p>	<p>See comments above on questions 2 Item 3(i) and 8 (ii). Examples given by NGET are not comparable.</p> <p>This explanation shows that NGET is directly involved in the consenting process even though that is being conducted in the name of the Applicants.</p>

No.	Agenda Item	Question	Response	SASES comment
			<p>The duties in Schedule 9, Paragraph 1(1) of the Electricity Act 1989 therefore apply to a licence holder (NGET) in the transmission of electricity who is formulating relevant proposals.</p> <p>As the DCO works include the installation of an electric line and works in connection with transmission, NGET understand that the Promoter has on behalf of and in conjunction with input provided from NGET applied the principles of Schedule 9 throughout the formulation of the proposals. This is reflected in the application of the Horlock Rules and the testing of the National Grid substation through both RAG and further assessments. This work was supported by significant public consultation.</p> <p>The project has also been subject to full consideration in the Environmental Impact Assessment. This has had full regard to all of the matters set out in Schedule 9.</p>	<p>This is an inadequate explanation - see SASES post hearing submissions in respect of site selection. What NGET has not addressed here, and the omission is telling, is how the duties in Schedule 9 were fulfilled in the CION process itself which led to the decision to locate a new National Grid connection hub in the Leiston area.</p>

22		<p>National Grid Sub-Station Installation Technology</p> <p>NGET are asked to explain:</p> <p>(a) The considerations that will be taken into account in determining the insulation technology to be adopted (AIS or GIS);</p> <p>(b) The implications of each technology for the provision of landscape and</p>	<p>(a) Justifications for the preference will take into account the following parameters:</p> <ul style="list-style-type: none"> i. Sustainability ii. Cost iii. Environmental/Consents iv. Engineering and Construction <p>NGET will also consider the requirements of the relevant NGET Policy Statements.</p> <p>Although both AIS and GIS are included in the application, NGET's preference is for AIS switchgear technology. As part of NGET's environmental ambitions, with particular</p>	<p>Given the projects have been proposed for many years and given the resources at NGET's disposal it is difficult to understand why this decision between AIS and GIS has not already been made and why it cannot be made prior to the end of the examinations.</p> <p>"Sustainability" can have a number of meanings particularly given a separate parameter is "Environmental".</p> <p>Also it is difficult to understand why "Consents" is a parameter given the DCOs will have already been granted.</p> <p>There is no indication of which of these parameters might take priority. For example the concern would be that cost takes priority over all other factors so that even though a particular design has a reduced environmental impact and better sustainability it will be rejected in favour of a cheaper solution.</p> <p>Although AIS stated to be the preferred technology NGET states in (b) below that this is the "worst case" scenario.</p>
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No.	Agenda Item	Question	Response	SASES comment
		<p>landform mitigation and for visual amenity to all receptors;</p> <p>(c) When a decision will be made and, if outside the examination period why this is the case and how the uncertainty this creates can be managed; and</p> <p>(d) If the footprint of the NG substation is reduced because GIS is adopted, will this reduce the area of land required, if not, why not?</p> <p>(e) Confirm without qualification that the proposed NG</p>	<p>focus on achieving net-zero carbon targets, NGET aspire to own an SF₆ free transmission network. This is driven by:</p> <ul style="list-style-type: none"> • NGET’s commitment to Net Zero at 2050. • NGET’s ambition to reduce SF6 emissions by 80% at 2030. • Existing and anticipated future legislation. <p>(b) Table 29.2 of Chapter 29 of the Environmental Statement sets out the Realistic Worst-Case Scenarios. In the section of the table considering impacts related to the National Grid Infrastructure, it was concluded that National Grid substation incorporating AIS represented the worst case. As explained in the notes section of the table, the National Grid GIS substation has a reduced footprint when compared to the AIS technology. The differences were further illustrated in the chapter in plates 29.2 and 29.3. In addition to the assessment visualisations (Figures 29.13 to 29.32), a further set of visualisations was also provided to illustrate the GIS National Grid substation (Figures 29.33 to 29.45).</p> <p>(c) A decision is likely to be made by the end 2021 following a design assessment by NGET’s appointed ECI substation contractor.</p>	<ul style="list-style-type: none"> • <p>(b) If AIS is the worst case scenario why is this the preferred solution of NGET?</p> <p>(c) for the reasons set out above this assessment should be brought forward so a decision can be made prior to the end of the examinations. It is difficult not to conclude that NGET has</p>

Substation and all the land subject to CA proposals at Friston in the Applications before the ExA's will serve only EA1N and EA2.

deliberately delayed this assessment to provide itself with maximum flexibility in terms of its use of the Friston site.

(d) The draft DCO for each project includes associated development including Work 41 is as follows:

(d) As noted above the National Grid NSIP and infrastructure contains substantial other works not least three cable sealing ends and the permanent access road.

Work No. 41 — a new national grid substation to the north west of

No.	Agenda Item	Question	Response	SASES comment
			<p data-bbox="965 359 1608 416"><i>Work No. 30 at Grove Wood, Friston and extension of permanent access comprised within Work No. 34.</i></p> <p data-bbox="772 483 1695 948">With respect to the extent of the grid connection works sought within the draft DCO and the associated compulsory acquisition powers sought, the Works Plans show the limits of deviation for each work number (i.e. the area in which each work no. can be constructed) and Article 3(2) of the draft DCO states that "Each of the scheduled works must be constructed and maintained within the limits of deviation for that work". The size and scale of the works that can be built within the limits of deviation are then limited by the requirements of the draft DCO and by what has been assessed in the environmental statement. For example, Requirement 12 of the draft DCO limits the National Grid works as follows:</p> <p data-bbox="819 978 1695 1129"><i>(6) No stage of the national grid substation comprised within Work No. 41 may commence until details of the layout, scale and external appearance of the national grid substation have been submitted to and approved by the relevant planning authority. Work No. 41 must be carried out in accordance with the approved details.</i></p> <p data-bbox="844 1145 1695 1203"><i>(7) Buildings comprised within the national grid substation must not exceed—</i></p> <p data-bbox="866 1219 1695 1276"><i>(a) where AIS substation arrangement is used, a height of 6 metres above finished ground level; and</i></p> <p data-bbox="866 1292 1695 1350"><i>(b) where GIS substation arrangement is used, a height of 16 metres above finished ground level.</i></p> <p data-bbox="819 1366 1695 1439"><i>(8) External electrical equipment comprised within the national grid substation must not exceed a height of 16 metres above finished ground level.</i></p>	<p data-bbox="1713 491 2172 619">NGET states that "<i>The size and scale of the works that can be built within the limits of deviation are then limited by the requirements of the draft DCO</i>"</p> <p data-bbox="1713 659 2141 866">As set out in SASES written representations in relation to the draft DCOs there are very substantial omissions in the detailed design parameters onshore. For example:</p> <ul data-bbox="1713 906 2141 1401" style="list-style-type: none"> - no area is stated for the cable sealing end compounds and overhead line gantries, - there are no parameters for the operational access road (work number 34) - other than for the National Grid substation itself there is no requirement for the details of the other parts of the National Grid infrastructure to be approved by the relevant planning authority.

No.	Agenda Item	Question	Response	SASES comment
			<p><i>(9) The fenced compound area (excluding its accesses) for the national grid substation must not exceed—</i></p> <p><i>(a) where AIS substation arrangement is used, 44,950 m2; and</i></p> <p><i>(b) where GIS substation arrangement is used, 16,800 m2.</i></p> <p><i>(13) The total footprint of the construction consolidation sites comprised within the following</i></p> <p>The footprint of the National Grid substation is therefore limited to 44,950 m2 (where AIS is used) and 16,800 m2 (where GIS is used) within the limits of deviation shown on the works plans for Work No. 41. Any freehold transferred to NGET would be restricted to the land actually required following confirmation of the technology to be used and detailed design. As such, if GIS technology is adopted the footprint and land take is reduced accordingly.</p> <p>(e) NGET requires the freehold compulsory acquisition of land of the footprint of the National Grid substation (the extent of which will be determined by the technology used/consented) and the sealing end compounds, access rights to the sub-station (which is shared with the promoter) and the sealing end compounds and overhead lines both on a temporary basis for construction and permanent operational access rights. NGET also require permanent rights relating to the overhead line works. As well as temporary access rights, temporary rights are required to facilitate the construction of</p>	<p>This is apparent from the extract of the draft DCO quoted by NGET which refers only to the substation in sub paragraphs 6, 7, 8 and 9.</p> <p>There does not appear to be a different works plan for work number 41 if GIS is used. Therefore the “limits of deviation” are the same regardless of whether AIS or GIS technology is used.</p> <p>As noted above the areas of the sealing end compounds, pylons and access road are not specified</p>

No.	Agenda Item	Question	Response	SASES comment
			<p>the works including over the construction compound areas. NGET will not ask the Promoter to transfer to NGET any land or CA powers in relation to any future potential extension areas. The land and rights required by NGET from the Promoter will relate solely to the connection of the projects and will not include any additional land.</p>	<p>Although NGET may not ask for land other than that which it decides is required for the National Grid NSIP that does not prevent the subsequent use of that land for other connections. This is a particular risk if GIS technology is used. As noted above the overhead realignment works and the cable sealing ends can be used for future connections in any event.</p>

APPENDIX 2 – SASES COMMENTS ON NGESO RESPONSES

Actions arising from the Compulsory Acquisition Hearings 1 (CAHs1) held virtually on Tuesday 1 December 2020.

NGESO Provides the following response(s) to **CAHs1**

		NGESO response	SASES comments
Action 2	(i) Please respond in writing to points raised under item 3 in relation to linked NSIP's and the justification for the applicants to be applying for the overhead line NSIP's.	NGESO refers this question to NGET	
	(ii) Please address possible circumstances in which connection proposals (over and above the currently proposed developments) may become additional and/or dominant users of the transmission system connection;	As operator of the national electricity transmission system, NGESO is the party that parties apply to when they want to connect to/use the system. Offers for connection/use have to be made by NGESO as required by its transmission licence. NGESO doesn't control in any way who and when a party can apply. In relation to connection applications for offshore wind farms the process for identifying the connection location is described in response 2d (iii) below. On the NGESO website there is a list of applicants in a signed connection position.	It is noted that NGESO has failed to answer this question. NGESO may not control who and when a party can apply but together with NGET it does control connections to the transmission system which should be subject to the obligations under the Electricity Act 1989.

NGESO Provides the following response(s) to ISHs2:

Action 3			SASES Comment
	<p>Under Agenda Item 2(d) the examining authority asked for:</p> <p>(i) the clearest position of public knowledge (not commercially confidential information) around projects proposed to connect in the Leiston Area.</p> <p>(ii) There was also discussion around whether a connection in the Leiston Area means Friston.</p> <p>(iii) Also, why Friston was chosen (including why a brownfield site was not selected).</p>	<p>(i) This question is addressed under question 9(ii) below.</p> <p>(ii) This is addressed in response to question 8(ii) below</p> <p>(iii) The Connection and Infrastructure Options Note (CION) process (a licence requirement delivered through STCP 18-1 Issue 009 Connection and Modification Applications) is used to identify a connection location following an application for a connection agreement. This industry approved procedure documents the role and responsibilities of the parties responsible for offshore grid connections, who comprise the Developer (in this case the Applicants), the Transmission Owner (TO) (in this case NGET) and NGESO (in its role as System Operator (SO)).</p> <p>The CION is a collaborative process resulting in a preferred point of connection to the transmission system to inform the connection offer and scope of the transmission works. The CION records the output of the work between the Developer, TO and NGESO to identify the overall most economic, efficient and coordinated connection option.</p> <p>Planning and environmental considerations are inherent in the process as the Developer must accept the connection offer and following the CION process the option identified must be feasible in terms of consenting and deliverability. All parties to the CION are mindful that the necessary consents must be subsequently obtained through the planning process to deliver the identified option.</p>	<p>2(d)(iii) The Examining Authorities will have noted that the CION process is not at all transparent given the highly redacted documents which were provided to SASES – see attachments to SASES post hearing submissions in respect of site selection. These documents were only provided after SASES had to resort to the Environmental Information Regulations in order to extract some information around the connection offers made by National Grid.</p> <p>It is unclear what “industry approved procedure” means. As implicitly indicated in the letter from Ofgem to SASES dated 30 January 2020 the CION process is not approved by Ofgem and the “<i>CION process was originally developed by NGESO.</i>”</p> <p>This response is disingenuous. In fact it is an admission that environmental considerations are only considered <u>after</u> the connection offer is made and therefore that environmental considerations are not taken into account in making the connection offer.</p>

		<p>Parties to the CION process are also subject to amenity duties under Schedule 9 of the Electricity Act 1989.</p> <p>In this case, the Applicants led on site selection within the Leiston area, accepted the connection offer, and are taking on responsibility to obtain consents. As such, NGESO consider that the Applicants are best placed to justify to the ExA the connection proposal from a planning perspective (both alone and in the context of the Applicants' projects as a whole), including the consideration of brownfield options within the Leiston area. NGET has a technical input in the CION process including identification of connection options, which led ultimately to the output of the CION process identifying the Leiston area for the connection</p>	<p>SASES Comment</p> <p>Whilst the Applicants may have led on site selection within the Leiston area, NGESO and NGET led on site selection of the Leiston area.</p> <p>Generally SASES refers the Examining Authorities to its post hearing submission in respect of site selection submitted at Deadline 3 which explains the defects in the explanation provided by NGESO</p>
3 (a)	<p>The choice to make a new onshore connection, as opposed to utilising/expanding existing connections at Bawdsey [and Sizewell or Bramford] or creating new connections elsewhere.</p>	<p>The response to Action 3, agenda item 2d part (iii) should address this question.</p>	<p>It does not.</p>

<p>3(b) The specific need for, and justification of, locations of landfall at Thorpeness and substations/transmission systems connections, including the proposed National Grid substation and connections to the grid at land north of Friston. To include details of the strategic decision- making process for the proposed locations and their generation</p>	<p>NGESO refers this question to NGET and the Promoter</p>	
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	capacities – why were the sites chosen, and in what order?		
	3(c) Justification for the proposed cable alignments – was this as a result of the chosen landfall and substation locations? What rationale was used in the decision-making process of routes or ways to link up the chosen locations?	NGESO refers this question to the Promoter	
	4(b) Design and impact of the proposed substations/transmission systems connections, including the proposed National Grid substation and connections to the grid, specifically in terms of: a. Overarching siting and design issues b. Landscape and Visual Impact, including upon PRoWs c. Historic Environment d. Achieving good design	NGESO refers this question to the Promoter	

Action 8			SASES comment
	<p>(i) Explain why the proposed connection to transmission system at Friston was chosen and analysis of adverse effects that took place to inform the decision from the CION and related RAG (Red, Amber, Green) processes.</p> <p>(ii) Explain why, if there is a need for a strategic connection hub in the Leiston area accommodating multiple connections in addition to</p>	<p>(i) The connection point is the output of the CION process as explained in Action 3, agenda item 2d part (iii). Further explanation of the RAG status will be covered in the promoter Action 14</p> <p>(ii) It is not proposed to develop a strategic connection hub at Leiston. Under the current regulatory framework system reinforcements are generally identified by NGESO and transmission owners in an incremental manner as offers are made, taking</p>	<p>(i) See comments on NGESO response to Action 3, agenda item 2d part (iii) above</p> <p>(ii) Whilst the development of a strategic connection hub is not formally proposed it is inevitable for regulatory and practical reasons that Friston will become a connection hub, not least given the grid connection infrastructure which will be built as part of the NG NSIP.</p> <p>There does not seem to be a mention of the statutory obligation of "coordination" in this response.</p>

	<p>the connections for the proposed developments, entities in the National Grid Group of companies have not taken the lead in identifying its location an seeking a planning approval/development consent in their own right.</p> <p>(iii)</p> <p>In the event that the decision to connect at Friston was made solely or principally by the Applicants, explain your view of the proposal.</p> <p>Does leadership site selection and initial development by the applicants raise any relevant implication or risks for your strategy and purpose in seeking to develop a transmission connection location for multiple uses at or around Leiston.</p>	<p>opportunity for efficiencies where practicable, rather than on an anticipatory basis of future need.</p> <p>(iii)</p> <p>NGESO does not have a strategic plan for connections around Friston. Each application to NGESO is assessed on its own merits and where applicable NGESO will aim to coordinate network development across various parties. See response to question 2(d)(iii) for explanation of the CION process which is intended to identify the connection location following an application for a connection agreement.</p>	<p>SASES comment</p> <p>(iii)</p> <p>Whilst NGESO may not have a “strategic plan” as such, it is inevitable for regulatory and practical reasons that Friston will become a connection hub, not least given the grid connection infrastructure which will be built as part of the NG NSIP.</p> <p>See comments on NGESO response to 2d part (iii) above</p>
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<p>Action 9</p>	<p>(i) Explain the planning assumptions in relation to (a) a connection at Leiston; and (b) the development of a strategic connection hub in the Leiston area in the next 10 years.</p> <p>(ii) Outline potential projects requiring connection and their planning and legal status (including Nautilus, Eurolink, Five Estuaries, North falls and SCD1 and 2),</p> <p>(iii) Explain the information held on the NGV website appearing to commit</p>	<p>(i) (a) see response to 2(d)(iii) above. (b) There is no planned strategic connection hub at Leiston and so no planning assumptions have been made in respect of this.</p> <p>(ii) For details of the planning and legal status of the projects generally it may be better to approach the Applicants. From NGESO's viewpoint our understanding of the current status is as follows and the following is an extract from NGESO's website as of 09/12/2020.</p> <ul style="list-style-type: none"> • Nautilus – the connection contract is signed and the connection point is at Leiston 400kV substation. The project status is currently 'Scoping' 	<p>SASES comment</p> <p>(i) (a) see SASES comment on NGESO's response to 2(d)(iii) above (b) Whilst NGESO may not have a "strategic plan" as such, it is inevitable for regulatory and practical reasons that Friston will become a connection hub, not least given the grid connection infrastructure which will be built as part of the NG NSIP.</p>
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<p>to connecting several project to a connection at Friston.</p> <p>(iv) Confirmation of location of the proposed Leiston Connection point. Is it one and the same as the Applicants proposed connection point at Friston? If more than one point of physical connection is envisaged then please make this clear.</p> <p>(v) Please identify where there is sufficient information to allow a cumulative impact assessment to be undertaken of adverse effects of projects likely to be planned to be connected at Friston. When will this assessment be carried out?</p>	<ul style="list-style-type: none"> • Eurolink – the connection contract is signed and the connection point is at Leiston 400kV substation. The project status is currently ‘Scoping’ • Five Estuaries – the connection contract is signed and the connection point is Galloper North 132/33kV. The project status is ‘currently awaiting consents’ • North Falls – the connection contract is signed and the connection point is Greater Gabbard Extension Offshore Platform. The project status is ‘scoping’. <p>NGESO assumes the reference is to NOA reinforcement SCD1 & SCD2. In the 2019/20 Network options assessment SCD1 was given a proceed signal and SCD2 was put on hold. This decision is referencing spend between April 2020 and April 2021. The needs case is investigated annually. The ExA may wish to note the role and status of the NOA, for example as explained section 1.4 <i>"The NOA cannot [...] provide recommendations for customer connection. The NOA only recommends the most economic reinforcement to resolve wider network issues."</i></p> <p>download (nationalgrideso.com)</p> <p>(iii) NGESO cannot comment on information appearing on other party’s websites and this question should be addressed to NGV. NGV, although part of the National Grid group, is a separate legal entity and in terms of connection applications is treated in the same manner as any other applicant for connection and use of system. NGESO’s transmission licence requires it to act in a non-discriminatory manner</p>	<p>(ii) <u>Five Estuaries</u></p> <p>The reference to “Galloper North 132/33 KV” is assumed to be the substation infrastructure at Sizewell next to Broom Covert which is within the Area of Outstanding Natural Beauty. Given this infrastructure will require expansion in order to connect the project it is difficult to understand why a connection offer has been made that will require development in an AONB. It would appear that environmental considerations have been ignored. Given the undoubted difficulty in securing planning consent within the AONB it would seem inevitable that in fact the connection point will be Friston once the NG NSIP is constructed.</p> <p><u>North Falls</u></p> <p>A connection offer seems to have been made to a point which is not part of the National Grid therefore this cannot be a connection offer since by definition a connection offer has to be to the National Grid. This requires further explanation.</p> <p>In respect of SCD1 and SCD2 these are interconnector projects of NGET/NGESO not an unrelated third party. The interactive maps provided as part of the NOA clearly show an onshore connection point in the Sizewell/Leiston area. Therefore NG/NGESO must have considered onshore connection locations as part of the proposals for SCD1 and SCD2 and have reasons for proposing a connection point in the Sizewell/Leiston area. Those reasons no doubt included the plans for a new “Leiston” connection point at Friston.</p>
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		(iv) NGESO refers this question to NGET	(iv) NGET has referred this question to NGESO!
		(v) NGESO refers to NGET and SPR.	
Action 12	Specification and capacity of the Existing Transmission system OHL's out of Sizewell.	NGESO refers this question to NGET	
Action 15	NG ESO are asked to supply relevant references supporting the operation of the CION process.	See response to Question 2(d)(iii) above. NGESO understands that a redacted version of the CION has been provided to the planning inspectorate The ExA is also referred to the following CION guidance note of 2018: Connection and Infrastructure Options Note (CION) Process Guidance Note - Issue 004 (nationalgrideso.com)	See SASES comments on NGESO's response to Question 2(d)(iii) above. Generally SASES refers the Examining Authorities to its post hearing submission in respect of site selection submitted at Deadline 3 which explains the defects in the explanation provided by NGESO

<p>Action 16</p>	<p>Reference was made in the hearings (by Counsel for SASES) to the duties on licensed bodies under s9 and sch 9 of the Electricity Act 1989 (as amended) please set out your response to these duties in terms of their applicability and (where applicable) your siting and design response to them when making siting and design decisions relating to onshore infrastructure. Specifically provide your response in relation to Schedule 1(1) and equivalent policies in NPS EN-5.</p>	<p>See response to question 2(d)(iii) above.</p>	<p>See SASES comments on NGENSO's response to Question 2(d)(iii) above.</p> <p>Generally SASES refers the Examining Authorities to its post hearing submission in respect of site selection submitted at Deadline 3 which explains the defects in the explanation provided by NGENSO</p>
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End of responses for ISHs1