# SPR EA1N and EA2 PROJECTS

## DEADLINE 2 - COMMENTS ON STATEMENTS OF COMMON GROUND WITH NGET, NGESO, NGV

**Interested Party**: SASES **PINS Refs:** 20024106 & 20024110 **Issue:** 1

The following are SASES's comments on the Statement of Common Ground with NGET, NGESO and NGV. The absence of any comment on any individual statement should not be taken as an indication that SASES either agrees or disagrees with such statement.

| Reference | Statement | SASES Comment |
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| ESO-004 (Ref.1 p6)<br>NGET-004 (Ref. 2 p7)<br>Site Selection and Assessment of Alternatives | **SPR & NGET**<br>Co-location of the National Grid infrastructure with the onshore substations supports NG-ESO's obligations under Section 9 of the Electricity Act 1989 to develop and maintain an economical and efficient network. These obligations are recognised within paragraph 2.3.5 of National Policy Statement for Electricity Networks Infrastructure (EN-5). | The ExAs are asked to note that co-location is not agreed as NECESSARY condition of meeting EA 1989 requirements. It follows that SPR's RAG assessment was wrong to only score sites as GREEN where they were co-located and within 500m of overhead lines. A RAG status of RED for being over 1km from OHLs is not justified or acceptable.<br>**Alternative SPR sites within (at a minimum) a 5km radius of the preferred NGET substation site should have been assessed.**<br>As a general comment SPR's site assessment methodology fails to distinguish between the Engineering requirements of the NGET substation, and the SPR substations. As a result the assessments reached should not be relied on. The NGET substation is probably best positioned close to OHLs whilst the SPR substations can be up to 5km away from the NGET connection (and more in some cases c.f. IFA2 Interconnector project at about 10km). The RAG criteria do not reflect this. |

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| Outline NG Substation (Ref. 3 p6)<br><br>Finished Ground Level | **SPR** Based on preliminary engineering design undertaken, the maximum finished ground level in respect of the National Grid substation is in the region of 20.1m AoD, falling to a low point in the region of 16.8m AoD. The final finished ground level will be established during detailed design post consent. | The absence of a committed Finished Ground Level means that none of the photomontages of the substation can be relied on as being worst case, or even a median case. This is not satisfactory.<br><br>Specifically what finished ground level are the photomontages based on? Is it anticipated worst case?<br><br>The NGET and SPR substations are allocated adjoining sites so the ground relationship between these three substations needs to be understood so that the visual impact and flood risk issues can be fully understood. A detailed plan showing worst case ground contours needs to be provided to allow a proper assessment. |
| NGV-002<br><br>(Ref. 4 p7)<br><br>Connection to the National Grid Substation | At this early stage of the Nautilus and EuroLink project design, the location and extent of the onshore substations (as shown on the Works Plans (AS-003)) and outline landscaping design as shown in Environmental Statement (ES) Figure 29.11a - Outline Landscape Mitigation Plan (OLMP) General Arrangement (APP-401),is not anticipated to prevent the potential future extension of the National Grid substation (within the areas shown in Figure 1, Appendix 1) to accommodate the connection of NGV's Nautilus and EuroLink projects to the national electricity grid. | This response suggests that the Applicants are currently requesting more land than is specifically required for the purposes of the EA1N and EA2 projects. If such additional land is required the NGET substation should be the subject of a Planning Application in its own right in which all potential requirements are declared.<br><br>The Figure 1 of Appendix 1 of Ref. 4 clearly indicates that additional substation land has been planned for to allow extension of the NGET substation in support of the NGV Nautilus and EuroLink projects. This extension land has been previously outlined without explanation in Layer *'22_05 linework'* of the OLMP dated 21/08/19 so is not new. The western extent of this land was shown as a SUDS area in the Phase 4 consultation so has clearly been moved to allow for the NGV projects.<br><br>This situation appears to be contrary to SPR assertions in their response to ExQs 1.10.7 below. |
| ExQs 1.0.17<br><br>(Ref. 5 p40) | a) The Applicants selected the onshore substation and National Grid substation locations to reflect the requirements of the Projects only and did not consider potential expansion of the National Grid substation. Selecting sites for the onshore substations and National Grid substation was a process that considered | This response appears to be inconsistent with the response given in connection with NGV-002 (see above) as the land allocated for the NGET substation and associated screening seems to be greater than that specifically required for EA1N and EA2 alone. |

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| | multidisciplinary principles and criteria that were selected based on well established guidelines. The process, along with the various options considered and the reasons for their dismissal / selection is fully detailed in section 4.9 of ES Chapter 4 Site Selection and Alternatives (APP-052).<br><br>b)Connection offers for other projects (those not proposed by the Applicants) are the responsibility of National Grid Electricity System Operator Limited. The Applicants do not have such information. | |

**References: NEED TO EDIT**


**Ref. 1** **ESO-004** https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002633-ExASoCG20D1V1EA1NEA2DraftStatementofCommonGroundwithNationalGridElectricitySystemOp_378255_1%20(1).pdf

**Ref. 2** **NGET-004** https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002632-ExASoCG21D1V1EA1NEA2DraftStatementofCommonGroundwithNationalGridElectricityTransmiss_378256_1.pdf

**Ref. 3** https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002595-ExAAS6D1V1EA1NOutlineNationalGridSubstationDesignPrinciplesStatement_378217_1.pdf

**Ref. 4** **NGV-002** https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002634-ExASoCG19D1V1EA1NEA2DraftStatementofCommonGroundwithNationalGridVentures_378254_1.pdf

**Ref. 5 ExQs 1.0.17** https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010077/EN010077-002691-ExAWQ1D1V102EA1NEA2ApplicantsResponsestoWQ1Volume210Overarchinggeneralandcross_378387_1.pdf