

BT-NG-020621-545-0144

# Bramford to Twinstead Reinforcement

Volume 8: Examination Submissions

Document 8.3.6.4 (D): Statement of Common Ground East Anglia Three Limited

Final Issue D  
March 2024

Planning Inspectorate Reference: EN020002



The Infrastructure Planning (Examination Procedure) Rules 2010  
Regulation 8(1)(e)

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## Version History

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Date	Issue	Status	Description / Changes
25 September 2023	A	Final	<p>Deadline 1 SoCG. The subject of this SoCG was previously contained in the Draft Statement of Common Ground TC East Anglia One OFTO Limited and East Anglia Three Limited [APP-174].</p> <p>However, the transmission assets of the East Anglia One Windfarm were subsequently transferred to TC East Anglia One OFTO Limited, who are now the Transmission Licence holder for these assets. Since the divestment of East Anglia One from Scottish Power Renewables (SPR), the Applicant has been engaging with the new licence holder. Meanwhile, the East Anglia Three project remains wholly owned by SPR.</p> <p>As such, the submission SoCG [APP-174] has been split into two separate SoCG to reflect the two discrete projects and Licence holders.</p>
1 December 2023	B	Final	<p>An updated SoCG has been provided at Deadline 5. This SoCG reflects the latest position with East Anglia Three Limited, which since the Deadline 1 SoCG, the Applicant has issued Heads of Terms in respect to an Interface Agreement to manage the parties' respective projects.</p>
17 January 2024	C	Final	<p>An updated SoCG has been provided at Deadline 7. This SoCG reflects the latest position with East Anglia Three Limited and incorporates East Anglia Three's comments on the draft SoCG.</p>
11 March 2024	D	Final	<p>An updated SoCG has been provided at Deadline 10. This SoCG reflects the position with East Anglia Three Limited at the end of the DCO examination and incorporates East Anglia Three's comments on the draft SoCG.</p>

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# 1. Introduction

- 1.1.1 A Statement of Common Ground (SoCG) is a written statement produced as part of the application for development consent and is prepared jointly between the applicant and another party. It sets out matters of agreement between both parties, as well as matters where there is not an agreement. It also details matters that are under discussion.
- 1.1.2 The aim of a SoCG is to help the Examining Authority manage the examination phase of the application. Understanding the status of the matters at hand will allow the Examining Authority to focus their questioning and provide greater predictability for all participants in examination. A SoCG may be submitted prior to the start of, or during examination, and then updated as necessary or as requested during the examination phase.
- 1.1.3 This SoCG is between National Grid (the Applicant) and East Anglia Three Limited (the Consultee) relating to the application for development consent for the Bramford to Twinstead reinforcement ('the project'). This SoCG has been prepared in accordance with the guidance for the examination of applications for development consent for Nationally Significant Infrastructure Projects (NSIP) (Planning Act 2008) published by the Department of Communities and Local Government (Department for Communities and Local Government, 2015).
- 1.1.4 This SoCG has been prepared to identify matters agreed and matters not agreed between National Grid and East Anglia Three Limited in respect to the Bramford to Twinstead reinforcement and the East Anglia Three project (EA3) only.
- 1.1.5 At submission of the application for development consent, the subject of this SoCG was contained as part of 'Draft Statement of Common Ground TC East Anglia One OFTO Limited and East Anglia Three Limited' [APP-174], as Scottish Power Renewables (SPR) owned both projects. However, the transmission assets of the East Anglia One Windfarm were subsequently transferred to TC East Anglia One OFTO Limited, who are now the Transmission Licence holder for these assets.
- 1.1.6 Since the divestment of East Anglia One from SPR, National Grid has been engaging with the new licence holder for that project and as such, this SoCG relates to EA3 only and a separate SoCG has been progressed with TC East Anglia One OFTO Limited. The EA3 remains wholly owned by SPR.
- 1.1.7 Both the separate/standalone SoCG, which were provided at Examination Deadline 1, superseded the version submitted at submission of the application for development consent in April 2023 (Draft Statement of Common Ground TC East Anglia One OFTO Limited and East Anglia Three Limited [APP-174]).

## 1.2 Description of the Project

- 1.2.1 The Applicant has submitted an application for an order granting development consent to reinforce the transmission network between the existing Bramford Substation in Suffolk, and Twinstead Tee in Essex. This would be achieved by the construction and operation of a new electricity transmission line over a distance of approximately 29km. The project meets the threshold as a NSIP, as defined under Part 3 of the Planning Act 2008, hence National Grid requires a Development Consent Order (DCO).

- 1.2.2 The reinforcement would comprise approximately 18km of overhead line (consisting of approximately 50 new pylons, and conductors) and 11km of underground cable system (with associated joint bays and above ground link pillars).
- 1.2.3 Four cable sealing end (CSE) compounds would be required to facilitate the transition between the overhead and underground cable technology. The CSE would be within a fenced compound, and contain electrical equipment, support structures, control building and a permanent access track.
- 1.2.4 Approximately 27km of existing overhead line and associated pylons would be removed as part of the proposals (25km of existing 132kV overhead line between Burstall Bridge and Twinstead Tee, and 2km of the existing 400kV overhead line to the south of Twinstead Tee). To facilitate the overhead line removal, a new grid supply point (GSP) substation is required at Butler's Wood, east of Wickham St Paul, in Essex. The GSP substation would include associated works, including replacement pylons, a single circuit sealing end compound and underground cables to tie the substation into the existing 400kV and 132kV networks.
- 1.2.5 Some aspects of the project, such as the underground cable sections and the GSP substation, constitute 'associated development' under the Planning Act 2008.
- 1.2.6 Other ancillary activities would be required to facilitate construction and operation of the project, including (but not limited to):
- Modifications to, and realignment of sections of existing overhead lines, including pylons;
  - Temporary land to facilitate construction activities including temporary amendments to the public highway, public rights of way, working areas for construction equipment and machinery, site offices, welfare, storage and access;
  - Temporary infrastructure to facilitate construction activities such as amendments to the highway, pylons and overhead line diversions, scaffolding to safeguard existing crossings and watercourse crossings;
  - Diversion of third-party assets and land drainage from the construction and operational footprint; and
  - Land required for mitigation, compensation and enhancement of the environment as a result of the environmental assessment process, and National Grid's commitments to Biodiversity Net Gain.

## 1.3 Project Programme

- 1.3.1 It is assumed that the GSP substation and the associated works would take approximately 18 months to construct, and this would take place in advance of development consent being granted. The main overhead line/underground cable works are proposed to commence in mid-2024, starting with first site access and compound set up and then be completed in mid-2028. Reinstatement and landscape planting would then take place until mid-2029.

## 1.4 This Statement of Common Ground

- 1.4.1 For the purpose of this SoCG, the Applicant and the Consultee will jointly be referred to as the 'Parties'. When referencing to East Anglia Three Limited alone, they will be referred to as 'the Consultee'.
- 1.4.2 Throughout the SoCG:
- Where a section begins 'Matters Agreed', this sets out matters that have been agreed between the Parties and where there is no dispute.
  - Where a section begins 'Matters Not Agreed', this sets out matters that are not agreed between the Parties and where a difference of opinion remains.
  - Where a section begins 'Matters Under Discussion', this sets out matters that are subject to further negotiation between the Parties.
- 1.4.3 This SoCG is structured as follows:
- Section 1 provides an introduction to this SoCG and a description of its purpose.
  - Section 2 states the role of the Consultee in the DCO application process and details engagement undertaken between the Parties.
  - Section 3 sets out matters agreed between the Parties.
  - Section 4 includes the signing off sheet.
- 1.4.4 There are no matters that are not agreed between the parties. All matters are agreed between the parties subject to final approval from both parties of an interface agreement which is anticipated shortly after the close of examination.
- 1.4.5 It should be noted that this SoCG does not seek to agree the acceptability of the Consultee's development(s), but it will set out an approach as to how the Consultee's development(s) will be managed in the context of the project and the powers granted by the DCO, in respect to the Bramford to Twinstead reinforcement and EA3 only.
- 1.4.6 This SoCG has been updated at Examination Deadline 10 (11 March 2024) and supersedes the version submitted in April 2023 at the application stage (Draft Statement of Common Ground TC East Anglia One OFTO Limited and East Anglia Three Limited [APP-174]) and the subsequent versions submitted at Deadline 1, 5 and 7.

## 2. Record of Engagement

### 2.1 Role of the Consultee in the Process

2.1.1 East Anglia Offshore Wind Limited was originally a joint venture owned equally by SPR (UK) Limited and Vattenfall Wind Power Ltd. East Anglia Offshore Wind Limited has a Zone Development Agreement with The Crown Estate to develop approximately 7.2 gigawatts (GW) of offshore wind projects off the coast of East Anglia. East Anglia Offshore Wind has renamed this Zone the East Anglia Zone.

2.1.2 However, the transmission assets of the East Anglia One Windfarm have been transferred to TC East Anglia One OFTO Limited, and TC East Anglia One OFTO Limited is now the Transmission Licence holder for these assets. Since the divestment of East Anglia One from SPR, the Applicant has been engaging with the new licence holder company.

### 2.2 East Anglia Three

2.2.1 The East Anglia Three project (EA3) is the second project to be developed within the East Anglia Zone and comprises an offshore windfarm consisting of up to 100 offshore wind turbines and associated infrastructure, located approximately 69km from the Suffolk Coast. EA3 includes an onshore cable route to transport energy to a converter station in Bramford, adjacent to the existing National Grid and East Anglia One's substations at Bramford Substation. A plan showing East Anglia Three's Order Limits within the proximity of Bramford Substation is contained at **Appendix 1**.

2.2.2 In respect to the EA3, the high-level project timeline is summarised as follows:

- An application for development consent was submitted to the Planning Inspectorate in November 2015.
- On 28 March 2017 the Planning Inspectorate issued a report of recommendation to the SoS for BEIS. The SoS approved the application for consent on 7 August 2017.
- In June 2019 BEIS approved a non-material change to increase the overall capacity of the windfarm to 1,400MW.
- In April 2021 BEIS approved a second non-material change to reduce the number of offshore substations to one and to decrease the number of wind turbines and increase their hub height and rotor radius.
- In August 2021 a third non-material change was submitted to remove the maximum generating capacity of 1,400MW and to decrease the number of wind turbines and increase their height and rotor radius.
- Onshore construction began in July 2022 and is ongoing.

2.2.3 The Consultee is defined as EA3, who in turn is wholly owned by SPR.

## 2.3 Project Interface

- 2.3.1 The project would contain and/or involve development works that relate to the removal/installation of overhead lines on/or in close proximity to elements of the Consultee's proposed and existing developments at Bramford near Bramford Substation, including the installation of new shunt reactors to maintain the electrical operating parameters of the 400kV network and gantry structures to connect the overhead line into the substation. This work would take place within the boundaries of the Applicant's operational land.
- 2.3.2 The proposed 400kV overhead line would tie into the existing substation on the western boundary. This would require the realignment of the existing 400kV overhead line and a new angle pylon, near Hill Farm to connect into Bramford Substation. The existing 400kV overhead line to the north-east of Hill Farm would be removed (comprising three pylons and the intervening spans of conductors).
- 2.3.3 The following list provides details of the proposed development works, that would be required pursuant to the project and as detailed on Sheet 1 General Arrangement Plan (see **Appendix 2**). These works may interface with the Consultee's proposals in this location, as the works also fall within the Order Limits for the East Anglia Three project:
- The removal of a short section of the existing 400kV overhead line including two pylons 4YL002 and 4YL003;
  - Realignment of the existing 400kV line (removal of the section of line extending north-west from the substation (green line) and replacement of line extending to the south-west from Bramford (grey line));
  - Moving the existing 400kV overhead line (downleads and conductors) from the northern gantry;
  - Constructing the two 400kV overhead lines to both come into the two western gantries;
  - Switchgear; and
  - Shunt reactors on the southern line (one for each circuit, needed due to the underground cable section down the line).
- 2.3.4 The technical interface chiefly comprises the removal of three spans of overhead line; temporary use of the land in the vicinity of the existing sustainable urban drainage (SuDs) pond and it being a potential receptor for run off during removal and construction (although good practice measures will be put in place as outlined in GG15 CEMP Appendix A – Code of Construction Practice **[REP9-035]** to control and mitigate this risk); the proposed accesses including the access from Bullen Lane and East Anglia Three's access to the SuDs pond; works within the substation itself; the proposed cables between the converter station (East Anglia Three) to the existing National Grid substation; realignment of the 400kV overhead line extending to the southwest of Bramford Substation; removal of minor landscaping and subsequent replacement; possible removal and reinstatement of a section of the woodland to the south of the EA3 converter station and temporary construction works.
- 2.3.5 The Applicant has also considered whether the proposed works at Bramford Substation pursuant to the project would likely impact on the proposed landscape planting north of Bramford Substation associated with the East Anglia Three Converter Station. This landscape planting is proposed as part of the East Anglia Three Order Requirements to



mitigate landscape and visual impacts of the Converter Station. An interface plan showing the overlap of the Parties' projects is contained at **Appendix 3**.

- 2.3.6 However, it appears that the proposed landscape planting is contained to the north/north-west of the Order Limits for the project and there does not appear to be an interface between the Parties' projects, as demonstrated by the East Anglia Three approved landscaping proposals at **Appendix 4**.
- 2.3.7 The proposed works however, impact East Anglia One's landscape planting to the north-west of Bramford Substation which forms part of the consultees baseline for the EA3 landscape planting. The Consultee confirms that further investigation into the as planted details of East Anglia One's landscape planting is taking place and the Applicant is also conducting parallel discussions with East Anglia One on this matter. Also see the Applicant's Response to First Written Questions [**REP3-052**] at CM1.5.4 on this matter.
- 2.3.8 In respect to land used temporarily for construction, this would be reinstated in line with GG07 in the Construction Environmental Management Plan Appendix A: Code of Construction Practice [**REP9-035**] and states that land used temporarily would be reinstated where practicable (bearing in mind any restrictions on planting and land use) to its pre-construction condition and use.
- 2.3.9 In addition, the planting proposals are shown in Landscape and Ecological Management Plan (LEMP) Appendix B Vegetation Reinstatement Plan (**document 7.8.2 (C)**) and the planting schedules are included in LEMP Appendix C Planting Schedules (**document 7.8.3 (B)**). Therefore, the reinstatement planting would be secured through Requirement 4 (1) of the dDCO [**REP9-006**]. In addition, Requirement 9 of the draft DCO, requires that no stage of the authorised development may be brought into operational use until, for that stage, a reinstatement planting plan for trees, groups of trees, woodlands and hedgerows to be reinstated during that stage has been submitted to and approved by the relevant planning authority. The purpose of the proposed reinstatement planting is to replace what is removed, in order to maintain the existing baseline. The final reinstatement planting plan must be in general accordance with the LEMP (**document 7.8 (C)**) approved under Requirement 4, draft DCO [**REP9-006**].
- 2.3.10 As such, the Applicant considers that any impact to East Anglia One's landscape planting to the north-west of Bramford Substation would be limited in the first instance (see the Applicant's Response to First Written Questions [**REP3-052**] at CM1.5.4) and reinstatement is adequately controlled within the confines of the DCO to the satisfaction of the relevant planning authorities.

## 2.4 Summary of Pre-Application Discussions

- 2.4.1 Table 2.1 summarises the consultation and engagement that has taken place between the Parties prior to submission of the application.

Table 2.1 – Pre-application discussions

Date	Subject	Discussion Points
21 March 2022	Written response to Statutory Consultation	The Consultee responded to the Applicant's Statutory Consultation in the capacity of both East Anglia One and East Anglia Three. The Consultee drew a distinction between East Anglia One and Three, identified their land interests and advised that the project (as proposed at the time) was likely to impact on the Consultee's existing planting implemented as

			part of East Anglia One's Order Requirements to mitigate landscape and visual impacts associated with the Converter Station. In addition, the Consultee requested that matters in respect to cumulative effects between the projects were fully considered in any cumulative effects assessment, including traffic and transport, landscape, ecology, water resources and noise. See written response at <b>Appendix 5</b> .
14 April 2022	Consultee's Consultation feedback	Statutory	Meeting between the Applicant and the Consultee, focussed on the Consultee's Statutory Consultation feedback, particularly in respect to the implications of the Consultee's existing landscaping, SuDS pond, access, and cumulative effects. Issues discussed included whether a proposed construction compound to the south-west of the Consultee's converter station can be moved, and access routes rationalised.
20 June 2022	Introductions		Follow-up email from the Applicant Consents Officer to initiate further discussions of the relative projects with a view of progressing a SoCG.
10 August 2022	Project interface		Virtual meeting with the Consultee's Consents Compliance Managers and to follow up on introductory emails and discuss the relative projects with a view of progressing a SoCG.
23 August 2022	landscaping Requirements, email from the Consultee	Discharge of	A follow up email from the meeting held on 10 August 2022, providing the Applicant to a link in respect to the landscaping Discharge of Requirements in respect to East Anglia Three for the area around Bramford Substation.
29 September 2022	Landscape planting and the Targeted Consultation, email to the Consultee		Following the Consultee's feedback at Statutory Consultation, it was reported to the Consultee's Consents Compliance Managers that a number of changes to the proposals around Bramford Substation had been implemented to reduce the impact on the Consultee's landscape planting southwest of the East Anglia One's Substation. It was also advised that the targeted consultation was open for responses.
10 October 2022	Consultee's written response to Targeted Consultation		The Consultee responded to the Applicant's Targeted Consultation advising that they were pleased to see a number of changes implemented following the Statutory Consultation. In addition, the Consultee requested that matters in respect to cumulative effects between the projects were fully considered in any cumulative effects assessment, including traffic and transport, landscape, ecology, water resources and noise. The Consultee also encouraged on-going discussions to inform any SoCG. See response contained at <b>Appendix 6</b> .
18 January 2023	Email from the Consultee's Head of Development to the Applicant's Consents Office		Email from the Consultee's Head Of Development advising that the Transmission Assets of The East Anglia One Windfarm have been transferred to TC East Anglia One OFTO Limited. As of this date TC East Anglia One OFTO Limited is the Transmission Licence holder for these assets.
20 January 2023	Draft SoCG		Email to Consultee with the Draft SoCG attached to initiate further discussions.

#### DCO SUBMISSION APRIL 2023

## 2.5 Summary of Post-Submission Discussions

Table 2.2 summarises the consultation and engagement that has taken place between the Parties post submission of the application.

Table 2.2 – Post-submission discussions

Date	Topic	Discussion Points
6 June 2023	Notification of Relevant Representation	The Applicant wrote to the Consultee to inform them that the application for development consent had been accepted and that relevant representations could be submitted.
Published 24 July 2023 (on PINS website)	The Consultee's Relevant Representations	The Consultee submitted a Relevant Representation [RR-029] to the Planning Inspectorate identifying their interest in land within the Order Limits and suggesting that the Applicant undertakes a full cumulative effects assessment.
7 June 2023	Further SoCG discussions	Follow up meeting with the Consultee's Project Manager in respect to the East Anglia Three project only to progress the SoCG.
11 September 2023	Further SoCG discussions	Virtual meeting with the Consultee's Project Manager and Senior Project Manager where parties agreed to progress discussions in respect to the technical interface; share more information on construction programmes and proposed and existing assets; the Consultee to provide a land interest plan; parties to consider vegetation removal; the Applicant's Land Agent to reach out to new contacts and the Consultee to provide an updated list of project contacts.
17 October 2023	Technical Construction Interface and	Technical interface discussion.
3 November 2023	Technical Construction Interface and	Continued technical interface discussions.
17 November 2023	Technical Construction Interface and Next Steps.	Continued technical interface discussions and next steps, including agreement of provisions to be included in the interface agreement.
24 November 2023	Email Issuing Draft Heads of Terms	Email sent by the Applicant's solicitors to the Consultee's solicitors, with attached draft Heads of Terms to initiate further discussions and agreement.
21 December 2023	Email Responding to Draft Heads of Terms	Email received from the Consultee's Solicitors with feedback.
January- March 2024	Email correspondence	Email correspondence with the aim of reaching agreement on the final interface agreement terms and SoCG.

## 3. Matters Agreed

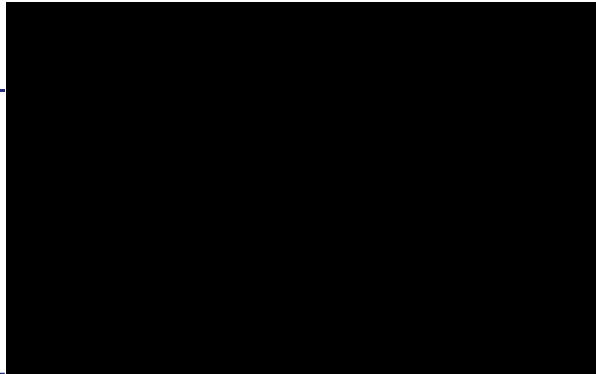
3.1.1 The Parties agree the following:

- i. Pursuant to section 6A(5) of the Electricity Act 1989, the Consultee benefits from an electricity supply licence under section 6(1)(d) of the Electricity Act 1989.
- ii. The Consultee acknowledges the project description for the project as set out in Section 1.2 of this SoCG.
- iii. The Consultee has no objection to the principle of the project.
- iv. The Parties can see no reason why the project and EA3 cannot be implemented and operated without conflict with one another.
- v. The Consultee has provided a plan of all their apparatus (existing or proposed) that is in the vicinity of the project and the Consultee agrees that it has identified and listed those parts of its network apparatus (existing or proposed) that are located within the vicinity of all that land that may be required for all the development works required under the terms of the project.
- vi. The Parties are in agreement as to what the technical interface comprises between the two respective projects and broadly the items which should be contained in the Interface Agreement. The Parties also agreed:
  - To share more information on construction programmes and proposed and existing assets (EA3 completed, the Applicant will provide further details once a Main Works Contractor has been appointed for the project);
  - The Consultee to provide a land interest plan (EA3 completed);
  - Parties to consider vegetation removal (completed by both parties);
  - The Applicant's Land Agent to reach out to new contacts (completed); and
  - An updated list of project contacts (completed by both parties).

3.1.2 All matters are agreed subject to final approval from both parties of an interface agreement which is anticipated shortly after the close of examination.

## 4. Approvals

Signed



**On Behalf of** National Grid Electricity Transmission

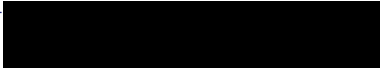
**Name** Sally Rotherham

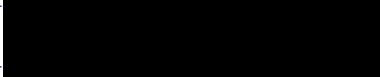
**Position** Lead Consent Officer

**Date** 08/03/2024

Signed

**On Behalf of** East Anglia Three Limited

**Name**  Digitally signed by Marta Menchi Rogai  
: cn=Marta Menchi Rogai, c=GB,  
ail=mmenchi@scottishpower.com

**Position**  Date: 2024.03.11 14:03:38

**Date**

# Reference List

Department for Communities and Local Government (2015) *Planning Act 2008: Guidance for the examination of applications for development consent*. March 2015 (Department for Communities and Local Government, 2015)

# Appendix 1: The Consultee’s Order Limits near Bramford Substation

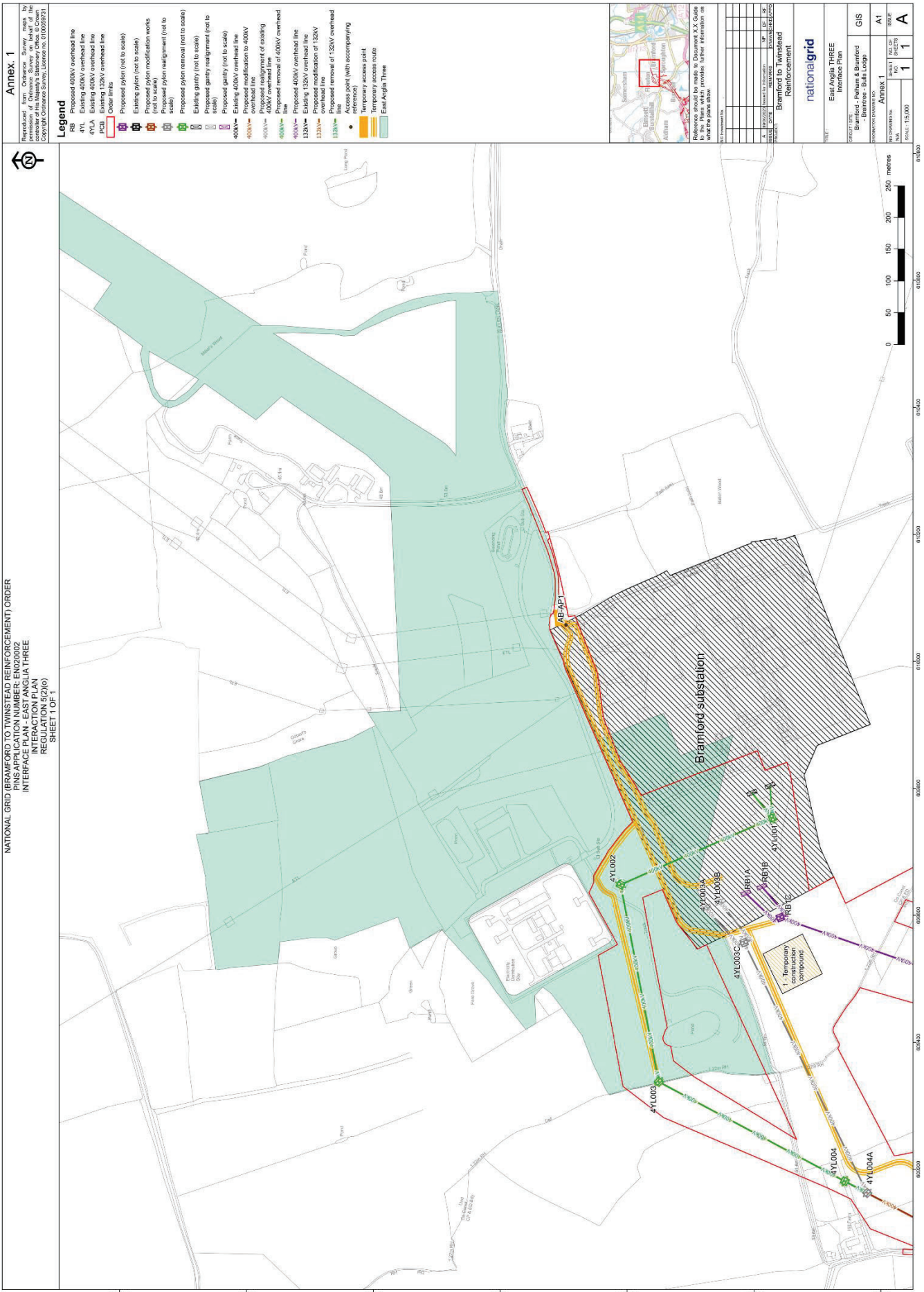




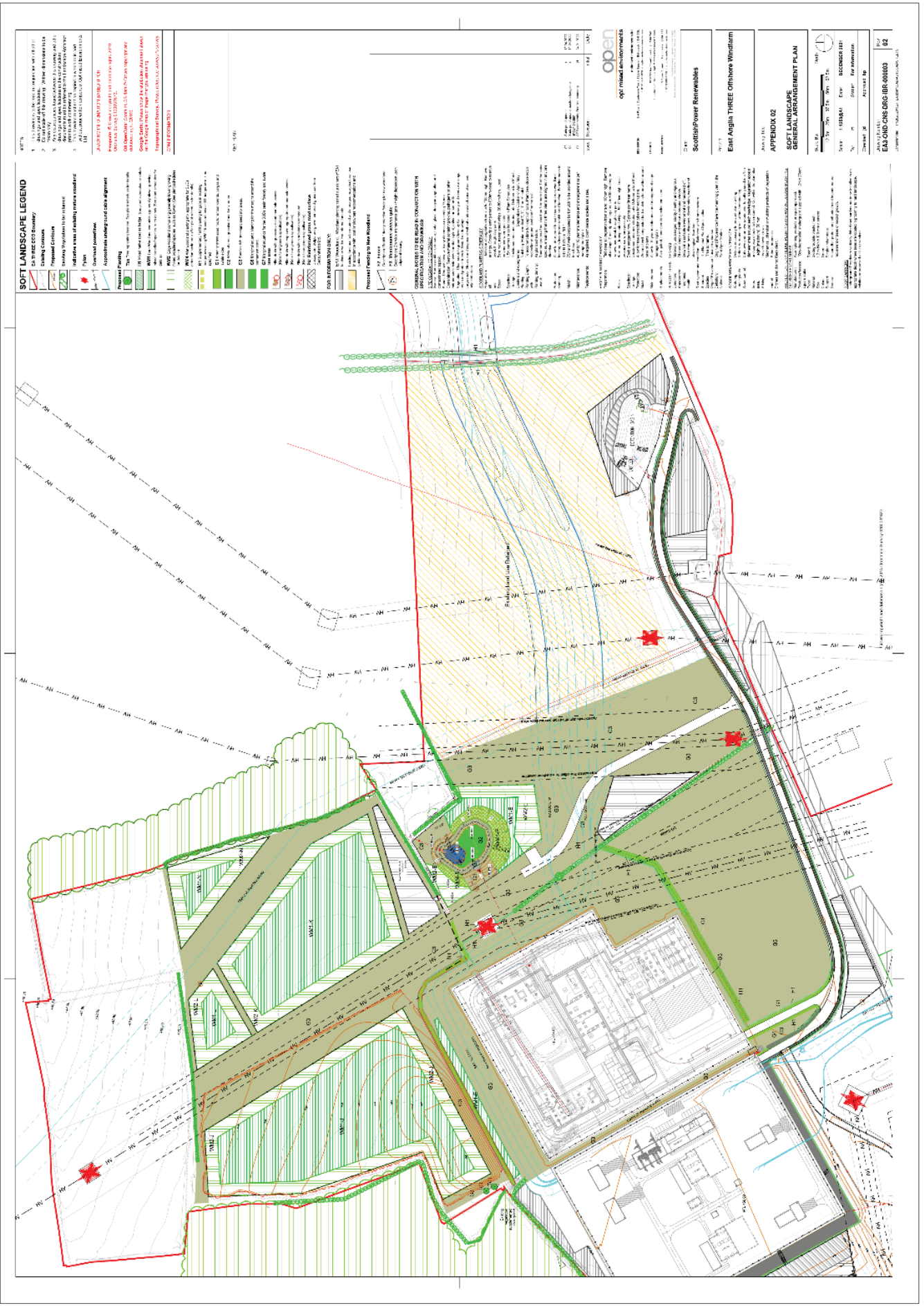
## **Appendix 2: The Project's Order Limits near Bramford Substation**



## **Appendix 3: East Anglia Three and Bramford to Tinstead Interface**



## **Appendix 4: East Anglia Three Approved Landscaping Proposals**



**SOFT LANDSCAPE LEGEND**

**Site Boundary**

**Planting Criteria**

**Proposed Conditions**

**Site Specific**

**Planting Schedule**

**Planting Priority**

**Planting Type**

**Planting Location**

**Planting Method**

**Planting Species**

**Planting Size**

**Planting Spacing**

**Planting Density**

**Planting Notes**

**PLANTING SCHEDULE**

**Planting Type**

**Planting Species**

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**Planting Density**

**Planting Notes**

## **Appendix 5: The Consultee's Response to Statutory Consultation**



21<sup>st</sup> March 2022

To whom it may concern,

## **Response to the Bramford to Twinstead Reinforcement January 2022 consultation**

This letter sets out jointly ScottishPower (UK) Limited's (SPR), East Anglia One Limited's (EAOL) and East Anglia Three Limited's (EATL) comments on the National Grid proposal to reinforce the electricity transmission network between the National Grid Bramford Substation and Twinstead Tee.

EAOL own and operate the East Anglia ONE offshore wind farm (EA1). EAOL is a joint venture between SPR and Bilbao Offshore Holding Limited (which is part of the Green Investment Group). EATL is wholly owned by SPR and is in the process of discharging Development Consent Order Requirements for the East Anglia THREE offshore wind farm (EA3). EA1 and EA3 are both Nationally Significant Infrastructure Projects for which development consent was granted, respectively, on 16 June 2014 pursuant to the East Anglia ONE Offshore Wind Farm Order 2014 (EA1 Order) and on 7 August 2017 pursuant to the East Anglia THREE Offshore Wind Farm Order 2017 (EA3 Order). The EA1 Order grants consent for electricity generation with an installed capacity of up to 750MW and the EA3 Order grants consent for electricity generation with an installed capacity of up to 1,400MW.

EAOL and EATL are statutory undertakers for the purposes of their respective projects and by virtue of Article 31 of the EA1 Order and Article 30 of the EA3 Order, the land within their Order Limits should be treated as operational land required in connection with their statutory undertaking. Proposed works in Section AB - Bramford Substation to Hintlesham - are located within the Order Limits of the onshore connection works for EA1 and EA3, namely the proposed removal of existing 400kV pylons and replacement with a new 400kV pylon at Bramford Substation. As such, EAOL and EATL have a significant interest as statutory undertakers whose operational land is affected.

SPR owns land adjacent to Bramford substation and is the grantee under deeds of grant of easement along the EA1 and EA3 onshore export cable corridor.

EAOL is also a tenant under a lease of part of the land owned by SPR adjacent to the Bramford substation and is entitled, as tenant, to exercise certain of the rights granted to SPR under deeds of grant of easement along the EA1 export cable corridor.

SPR, EAOL and EATL recognise the importance of the proposed reinforcement works, however it is imperative that the works do not compromise the construction and operation of EA3 or the operation of EA1, both of which will deliver substantial renewable energy benefits towards meeting the national need for renewable energy identified in the National Policy Statement for Renewable Energy (EN-3). There are a number of concerns for National Grid to consider, as described below.

### **Works within EA1 and EA3 Order limits**

The proposed removal of two 400kV pylons and the construction of a new 400kV pylon at Bramford Substation, are within the EA1 and EA3 Order Limits, on land owned by SPR and also





on land leased to EAOL. It is imperative that the reinforcement works around Bramford Substation are designed to ensure there is no impact on any land required by EAOL or EATL to mitigate impacts of or operate the EA1 and EA3 projects. Access to the EA1 and EA3 substations by SPR, EAOL and EATL must also be maintained at all times during both the construction and operational phases of the proposed works.

Specifically, the proposed works at Bramford Substation will impact on landscape planting south-west of the EA1 Substation, which was implemented as part of the EA1 Order Requirements to mitigate landscape and visual impacts. Any landscape planting removed would need to be replaced and further discussions would also be required on the subsequent maintenance of any replacement planting over a ten-year period.

Similarly, the two temporary access tracks required for the removal of the two 400kV pylons would also require the removal of EA1 landscape planting. It is recommended these access tracks are rationalised and combined to reduce the impact on landscape planting.

Further consideration must also be given to the proposed location of the temporary construction compound south-west of the EA1 Substation. The location proposed would sever the existing access track, impacting on the EA1 access to the SuDS pond. The proposed location in proximity to the pond also creates a risk of additional run-off from the construction compound, risking increased siltation of the SuDS pond.

### **Proposed planting**

In initial discussions with SPR, National Grid have explored potential opportunities to provide landscape planting as part of their own net gain requirements along the existing power line route, following the removal of the pylons near to the EA1 Substation. Further discussions would be required if this proposal were to be taken forward, particularly regarding types of planting proposed, details of who would undertake landscaping, land agreements to allow access and planting to take place, and what provision for the ongoing maintenance and replanting of any failed landscaping over an extended period would be made.

Additionally, further consideration is needed to ensure that any additional planting, replacement planting and/or loss of existing planting does not undermine the EA1/EA3 Landscape Master Plan requirements contained within the respective Orders and landscape management strategies. The loss of any planting resulting in a greater visibility of the respective EA1 and EA3 substations would not be acceptable in the first instance and will require coordination of an overall landscape master plan for all three schemes in cooperation with the appropriate Local Planning Authority. The requirement for any variation or consents as part of these works resulting for EA1/EA3 would be the responsibility of National Grid in consultation with EA1 and EA3 respectively.

### **Cumulative effects**

Given the requirement to assess cumulative effects in paragraph 5(e) of Schedule 4 to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, we trust that a full cumulative environmental assessment with both the EA1 and EA3 projects will be undertaken but we would comment particularly on EA3 for reasons set out below.

As the proposed works are likely to coincide with the construction phase of EA3, we believe the following topics require consideration, some of which are already noted in the preliminary cumulative assessment in the PEIR:



- **Traffic and transport:** Cumulative impacts from construction traffic associated with the proposed works and the EA3 Converter Station and cable route should be assessed. Additionally, the impact on Public Rights of Way (PRoW) amenity along the bridleway at Bullen Lane, which coincides with the vehicular access along Bullen Lane, should be considered.
- **Landscape, ecology and water resources:** As noted above, there is the potential for cumulative impacts in relation to landscape, water resources and ecology. This is associated with the impacts on existing landscape planting around the EA1 and EA3 substations and on the SuDS pond. This could have subsequent impacts on local fauna, including Great Crested Newts in the SuDS pond.
- **Noise:** The potential noise impacts from concurrent construction activities should be considered in the assessment and mitigated accordingly. It should be noted that piling activities are expected at the EA3 Converter Station. Information on the number, type and timing of these works will become available in Quarter 3 of 2023.

SPR, EAOL and EATL recognise the importance of the proposed works and the contribution both projects have in meeting the national need for renewable energy. We are keen to continue working with National Grid to address the concerns raised in this letter, as well as supporting National Grid's identification of enhancement opportunities around the Bramford Substation.

SPR are committed to Mid Suffolk District Council's strategic cumulative group in the Bramford area and are happy to provide appropriate information on the EA1 and EA3 sites as required. It is requested that National Grid continues to liaise with us through your existing contact at ScottishPower Renewables, Philip Rew-Williamson ([prew-williamson@scottishpower.com](mailto:prew-williamson@scottishpower.com)). Please do not hesitate to contact us for further discussion or information requests.

Yours Sincerely,

**Gareth Mills**  
EA Hub Onshore Project Manager,  
UK Offshore Development, ScottishPower Renewables

# **Appendix 6: The Consultee's Response to Targeted Consultation**



10 October 2022

Return address:

Terence Epo

East Anglia Three Limited c/o ScottishPower  
Renewables  
320 St Vincent Street

Glasgow

G2 5AD

To whom it may concern,

### Response to the Bramford to Twinstead Reinforcement September 2022 Targeted Consultation

This letter sets out East Anglia Three Limited's (EATL) comments on the updated National Grid proposal to reinforce the electricity transmission network between the National Grid Bramford Substation and Twinstead Tee.

EATL is wholly owned by ScottishPower Renewables and is in the process of discharging requirements for the East Anglia THREE offshore wind farm (EA3). EA3 is a Nationally Significant Infrastructure Project for which development consent was granted on 7 August 2017 pursuant to the East Anglia THREE Offshore Wind Farm Order 2017 (EA3 Order)..

By virtue of Article 30 of the EA3 Order, EATL is a statutory undertaker for the purposes of this project and the land within the Order Limits should be treated as operational land required in connection with its statutory undertaking. Proposed works in Section AB - Bramford Substation to Hintlesham - is located within the Order Limit of the onshore connection works for EA3, namely the proposed removal of existing 400kV pylons and replacement with a new 400kV pylon at Bramford Substation. As such, EATL have a significant interest as statutory undertaker whose operational land is affected.

EATL recognise the importance of the proposed reinforcement works, however it is imperative that the works do not compromise the construction and operation of EA3 which will deliver substantial renewable energy benefits towards meeting the national need for renewable energy identified in the National Policy Statement for Renewable Energy (EN-3).

Following on from our initial letter in response to the consultation in January 2022, alongside meetings between SPR and National Grid, the changes to the design at Bramford have been reviewed and it is appreciated that a number of our previous comments have been taken into consideration. Any outstanding comments are described below.

#### Works within EA3 Order limits

The proposed removal of two 400kV pylons and the construction of a new 400kV pylon at Bramford Substation, are within the EA3 Order Limits, on land owned by ScottishPower

Renewables. It is imperative that the reinforcement works around Bramford Substation are designed to ensure there is no impact on any EA3 land required to mitigate or operate the EA3 project. Access to the EA3 substation by EATL must also be maintained at all times during both the construction and operational phases of the proposed works.

Additionally, consideration is needed to ensure that any additional planting does not undermine the EA3 Landscape Master Plan requirements contained within the DCO and landscape management strategies. The requirement for any variation or consents as part of these works resulting for EA3 would be the responsibility of National Grid in consultation with EA3.

### **Cumulative effects**

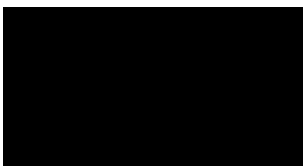
Given the requirement to assess cumulative effects in paragraph 5(e) of Schedule 4 to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, we trust that a full cumulative environmental assessment with the EA3 project will be undertaken. As the proposed works are likely to coincide with the construction phase of EA3, we believe the following topics require consideration, some of which are already noted in the preliminary cumulative assessment in the PEIR:

- **Traffic and transport:** Cumulative impacts from construction traffic associated with the proposed works and the EA3 Converter Station and cable route should be assessed. Additionally, the impact on Public Rights of Way (PRoW) amenity along the bridleway at Bullen Lane, which coincides with the vehicular access along Bullen Lane, should be considered.
- **Landscape, ecology and water resources:** There is the potential for cumulative impacts in relation to landscape, water resources and ecology. This is associated with the potential for impacts on existing landscape planting around the EA3 substations and on the SuDS pond due to the proximity of the works. This could have subsequent impacts on local fauna, including Great Crested Newts in the SuDS pond.
- **Noise:** The potential noise impacts from concurrent construction activities should be considered in the assessment and mitigated accordingly. It should be noted that piling activities are expected at the EA3 Converter Station. Information on the number, type and timing of these works will become available in Q3 of 2023.

SPR recognises the importance of the proposed works and the contribution both projects have in meeting the national need for renewable energy. We are keen to continue working with National Grid and welcome further meetings to discuss the issues noted above and any other items, including if National Grid would still like to arrange a Statement of Common Ground following these design updates.

SPR are committed to Mid Suffolk District Council's strategic cumulative group in the Bramford area and are happy to provide appropriate information on the EA3 site as required. It is requested that National Grid liaise with us through Terence Epo, (tepo@scottishpower.com). Please do not hesitate to contact us for further discussion or information requests.

Yours Sincerely,





**Terence Epo**  
Project Manager, Consent Compliance,  
UK Offshore Development, ScottishPower Renewables

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