From: To:

East Anglia ONE North

Subject: National Grid Electricity Transmission Plc - Submission at Deadline 3 [BCLP-LEGAL.2026502.000310]

Date: 15 December 2020 19:25:39

Attachments: 201214 NGET Note on Substation Component Parts.docx

NGET submission 15.12.20 (208835791v1 Legal).PDF

Dear Sirs,

Please see attached NGET's submission in response to the questions raised by ExA in their Action points to the CA and ISH hearings and an appendix note.

Kind regards

Abigail



ABIGAIL WALTERS Associate Director abigail.walters@bclplaw.com

BRYAN CAVE LEIGHTON PAISNER LLP Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR, United Kingdom bclplaw.com

## **Bryan Cave Leighton Paisner LLP**

Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR, UK DX 92 London/Chancery Lane t: +44 (0)20 3400 1000 f: +44 (0)20 3400 1111 w: www.bclplaw.com

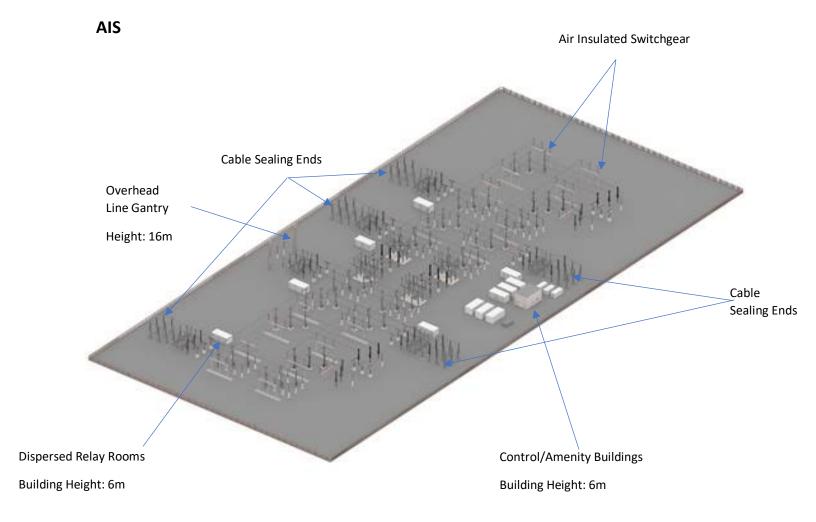
This email is from a law firm. It is confidential and may be covered by legal privilege. If you have received this email in error, please notify us immediately and delete it (including any attachments). You should not disclose its contents to any other person. We may monitor and record electronic communications in accordance with applicable laws and regulations. Where appropriate, we may also share certain information you give us with our other offices (including in other countries) and select third parties. For further information (including details of your privacy rights and how to exercise them), see our updated Privacy Notice at <a href="https://www.bclplaw.com">www.bclplaw.com</a>.

Bryan Cave Leighton Paisner LLP is a limited liability partnership registered in England and Wales (registered number OC315919) and a member of the BCLP Group (a "BCLP Firm") authorised and regulated by the Solicitors Regulation Authority. A list of partners is open to inspection at its registered office: Governor's House, 5 Laurence Pountney Hill, London EC4R OBR, UK. Within the BCLP Group, 'partner' is used to refer to a member, or an employee or consultant with equivalent standing and/or qualifications as required, of the BCLP Firm in which they practise. In the US, all our partners are members. For further information, see our website legal notices (www.bclplaw.com).

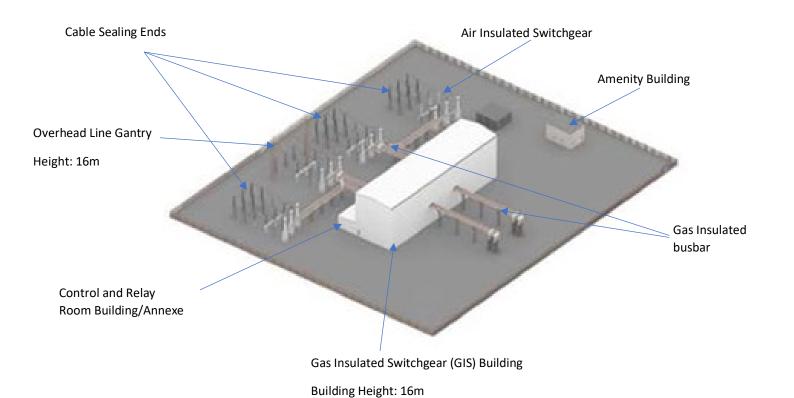
The National Grid substation will either be an 'air insulated substation' (AIS) or a 'gas insulated substation' (GIS) depending on the switchgear technology employed.

Irrespective of whether AIS or GIS technology is adopted, the National Grid substation, subject to final design, would be expected include the following key equipment (please also see the annotated plans overleaf). The final equipment to be utilised will be determined during the detailed design of the substation:

- Switchgear (air insulated or gas insulated): which includes switches, fuses, circuit breakers, relays, current transformer, and other equipment (some of which is described below). The switchgear switches, controls and protects the electrical circuits and equipment within the National Grid substation;
- Circuit breakers: which allow high speed isolation of the National Grid substation from the EA1N and EA2 substations and from the National Grid overhead lines;
- Disconnectors: which allow a physical break in the electrical circuits to be introduced which isolates the substation during periods of maintenance;
- Busbars: which carry electricity within the National Grid substation to various equipment;
- Current and voltage transformers: which convert electrical current and voltage to levels which can be safely measured by the National Grid substation's control and protection equipment;
- Surge arresters: which protect key equipment by providing a path to earth when triggered by an abnormal voltage condition such as a lightning strike;
- Earth switches: which allow safe maintenance of the National Grid substation equipment;
- Emergency generator: which provides standby low voltage electricity supply to the National Grid substation in the event of a failure of the local electricity supply;
- Earthing system: which provides a grounding mat below the earth surface at the National Grid substation to which equipment is connected to, protecting it from surges and lightning strikes by safely transferring current to ground;
- Ancillary buildings: which may include a small workshop/store, welfare, control building and incoming power and metering room.
- Up to four gantries: a gantry is a structure which supports electrical conductors as they transition from an overhead line pylon to the substation allowing them to connect to the busbars and other equipment within the substation.
- Cable terminations/sealing ends: used where underground cable joins onto busbars allowing connection to equipment within a substation or overhead line.
- Fence: electrified palisade fencing would be installed along the boundary to maintain security of the substation.



## **GIS**



East Anglia TWO Offshore Windfarm Development Consent Order

National Grid Electricity Transmission PLC (NGET) response to ExA's Actions from the Compulsory Acquisition and Issue Specific Hearing 2

15<sup>th</sup> December 2020



**Bryan Cave Leighton Paisner LLP**Governor's House, 5 Laurence Pountney Hill London EC4R 0BR
Tel: +44 (0)20 3400 1000 Fax: +44 (0)20 3400 1111

## Compulsory Acquisition Hearing — ExA's Agenda Questions

Qu.	Agenda	Question	Response
No.	Item		
1.	-	NGET to review the online recording and to	The short answer to this question is that the development consent order
		respond in writing to questions <u>raised of or</u>	application only seeks consent for those works necessary to provide a connection
		relating to them in light of discussions that	for EA1N and EA2 to the National Electricity Transmission System (NETS). The
		occurred. NGET feel that the key issue following	land take that NGET will require from the Promoter will only facilitate the
		review of the online recording was the "Extent to	connection of EA1N and EA2. NGET will not require the Promoter to provide to
		which the development consent for NGET	NGET any land or rights for any future connections. In order to seek to provide
		elements (and consequentially the land take) are	some more detail around this issue NGET have also responded in a longer
		required only to facilitate the connection of EA1N	response in the next three rows below, responding to the Agenda items for the CA
		and EA2 or whether consent is also sought for	Hearing.
		works to facilitate future connections".	
1.		Agenda item 4. Bullet 4 - The National Grid	The maximum footprint of the National Grid substation utilising AIS technology
		connection substation, including the need for	when operational is 44,950m2 and would be up to 145m (wide) x 310m (long).
		land and rights in respect of both this and the	The maximum footprint of the National Grid substation utilising GIS technology is
		other East Anglia application together.	16,800m2 and would be up to 140m (wide) x 120m (long). The size of the
			National Grid substation is dictated by electrical safety clearances and the
			switchgear technology used.
			The maximum height of permanent outdoor equipment within the National Grid

Qu.	Agenda	Question	Response
No.	Item		
			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).
			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 sub-station footprint and therefore the land
			take required.
			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.
			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

Qu.	Agenda	Question	Response
No.	Item		
			a circuit breaker, disconnectors and current/voltage transformers for protection
			purposes, and two sets of connections (downleads) from the overhead line pylon.
			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.
			NGET will require the freehold transfer of the land required for the sub-station
			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.
1.		Agenda item 4. Bullet 4 - The National Grid	Irrespective of whether AIS or GIS technology is adopted, only the customer
		connection substation, including the need for the	connection bay (which is approximately 1,100 sqm for AIS) for EA2 will not be
		land and rights in circumstances where only one	required if only EA1N goes ahead. For GIS, the connection bays are included
		project is consented.	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

Qu.	Agenda	Question	Response
No.	Item		
			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.  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.  The above response is the same if only EA2 goes ahead.  Accordingly, the land and rights sought remain the same.
1.		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.	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.  NGET will require the freehold transfer of the land required for the sub-station 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.

Qu.	Agenda	Question	Response		
No.	Item				
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.	<ul> <li>(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.</li> <li>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.</li> <li>Post-2008 Act the following projects are examples of this approach:         <ul> <li>Sizewell C DCO Application – includes a new NGET substation and realignment of the existing OHL into the site incorporating a new Pylon.</li> <li>Aquind Interconnector DCO Application – includes an extension to NGET Lovedean Substation.</li> <li>Neuconnect Interconnector Planning Application – includes a new NGET</li> </ul> </li> </ul>		

Qu.	Agenda	Question	Response
No.	Item		
			<ul> <li>substation and sealing end compound (SEC).</li> <li>Millbrook Power DCO Application – includes a new NGET substation and modifications to the existing OHL.</li> <li>Vanguard DCO Application – includes an extension to NGET's Necton Substation and modifications to the existing OHL.</li> <li>Boreas DCO Application – includes an extension to NGET's Necton Substation and modifications to the existing OHL.</li> <li>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.</li> </ul>
2	Item 3	(ii) Please address possible circumstances in which additional connection proposals (over and above the currently proposed developments) may become additional and/or dominant users of the transmission system connection;	(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.

Qu.	Agenda	Question	Response
No.	Item		
		(iii) and that further land may be required	(iii) As above, any additional connections to the substation would require an
		for this to occur.	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
3	Overarching	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.  Also respond in writing to questions raised of or in relation to them in light of the discussions that occurred.	As set out in NGET's response to Item 3(i) above, the approach of promotors 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.  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).
			(i) This is a question more appropriately answered by NGESO and is also asked under question 9(ii) below.

No.	Agenda	Question	Response
	Item		
		<ul><li>(ii) There was also discussion around whether a connection in the Leiston Area means Friston.</li><li>(iii) Also, why Friston was chosen (including why a brownfield site was not selected).</li></ul>	(iii) This is addressed in response to question 8(ii) below.  (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.
	3(a)	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.	The CION process is the responsibility of NGESO. A similar question is asked under 8(i).
	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	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.

No.	Agenda	Question	Response	
	Item			
8		capacities – why were the sites chosen, and in what order?  (i) Explain why the proposed	(i) The CION process identified the Leiston area and the Promoter's site selection	
		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.	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).	
		(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 an seeking a planning approval/development	(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. 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. The EA1N and EA2	

No.	Agenda	Question	Respon	Response	
	Item				
		consent in their own right.		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.  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.  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.	
		(iii) In the event that the decision to connect at Friston was made solely or principally by the Applicants,	(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 utilised	

No.	Agenda	Question	Response
	Item		
		explain your view of the proposal.	by NGET in accordance with the transfer of benefit from the Promoter to
		Does leadership site selection and	deliver the connection needed by the Promoter, in the Promoter's timescales
		initial development by the applicants	and in accordance with the discharge of the Promoter's requirements. It is
		raise any relevant implication or	not a standalone planning consent that NGET can implement without the
		risks for your strategy and purpose	Promoter's consent or absent the Promoter's scheme. In agreeing that the
		in seeking to develop a transmission	Promoter's DCO included the NGET substation and connection works to the
		connection location for multiple uses	OHL, NGET accepted this position. The substation can therefore only be
		at or around Leiston.	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.
9	2(a) to 2(e)	(i) Explain the planning assumptions in	(i) (a) the question in relation to the planning assumptions included in the CION
		relation to (a) a connection at	process are more appropriately answered by NGESO.
		Leiston; and (b) the development of	(b) please refer to the answer above to 8(ii).
		a strategic connection hub in the	
		Leiston area in the next 10 years.	
		(ii) Outline potential projects requiring	(ii) this question is more appropriately answered by NGESO.
		connection and their planning and	

No.	Agenda	Question	Response
	Item		
		legal status (including Nautilus	,
		Eurolink, Five Estuaries, North fall	
		and SCD1 and 2),	
		(iii) Explain the information held on the	(iii) questions relating to the content of the NGV website are more appropriately
		NGV website appearing to commi	
		to connecting several projects to a	
		connection at Friston.	
		(iv) Confirmation of location of the	(iv) this question is more appropriately answered by NGESO.
		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.	
		(v) Please identify where there is	(v) The development of a connectee's proposals post CION/connection process isn't a
		sufficient information to allow a	matter for NGET or NGESO to comment on unless individual promoters have
		cumulative impact assessment to be	themselves put material into the public domain.
		undertaken of adverse effects o	f
		projects likely to be planned to be	

No.	Agenda	Question	Response				
	Item						
		connected at Friston. When will this assessment be carried out?  Reference to oral contributions by NGV on Agenda Item 2 will assist.					
12		Specification and capacity of the Existing Transmission system OHL's out of Sizewell. Please explain:		ctor systems operati		struction supporting 4 x 400m current circuit ratings are tal	
		(a) The current specification and capacities of existing overhead			Winter	Summer	
		transmission lines (OHL's) at Sizewell,		Pre fault (MVA)	2335	1863	
				Post fault (MVA)	2779	2217	
		(b) How this compares with other typical OHL transmission system alignments,	operating a	it 400kV. However, i	it should be noted t	type and conductor system u hat whilst towers and conduct HL's depending on the required	ors are
		(c) Extent to which new generating capacity can be added to this OHL,	(c) No reco	onductoring works o	of the existing OHL	's would be required just to o	connect

No.	Agenda	Question	Response
	Item		
		including from the Sizewell C	EA1N and EA2. Any future connections required by other projects would need to be
		generating station without requiring	assessed and considered separately.
		upgrade/replacement and/or	
		additional conductors to be added to	
		the OHL's and	
		(d) The anticipated lifetime of these	(d) Towers are designed, fabricated and treated for a minimum design life of 80 years.
		OHL's	The minimum design life for conductor systems is 60 years.
16		Reference was made in the hearings (by	As a holder of a transmission licence NGET is required to comply with the general
		Counsel for SASES) to the duties on licensed	statutory duties in s9 of the Electricity Act 1989 to "develop and maintain an efficient,
		bodies under s9 and sch 9 of the Electricity	co-ordinated and economical system of electricity transmission and to facilitate
		Act 1989 (as amended) please set out your	competition in the supply and generation of electricity". The Promoter has addressed
		response to these duties in terms of their	the regulation of the industry and the statutory duties in respect of transmission in their
		applicability and (where applicable) your	Regulatory Context Note (REP2-003). In light of the Promotor's grid connection
		siting and design response to them when	application and subsequent CION process, NGET provided support and input to the
		making siting and design decisions relating to	CION process. When an offshore wind farm is proposed, the statutory duties to
		onshore infrastructure. Specifically provide	develop efficient, co-ordinated and economical proposals whilst also having regard to
		your response in relation to Schedule 1(1)	the environment apply and all three parties – NGESO, NGET and the Promoter, feed
		and equivalent policies in NPS EN-5.	into the assessment that is led by NGESO. As outlined in answer to questions 2 Item

No.	Agenda	Question	Response
	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.
			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:
			(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
			(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.
			The duties in Schedule 9, Paragraph 1(1) of the Electricity Act 1989 therefore apply to a

No.	Agenda	Question	Response
	Item		
			licence holder (NGET) in the transmission of electricity who is formulating relevant proposals.  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.  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.
22		National Grid Sub-Station Installation Technology NGET are asked to explain:  (a) The considerations that will be taken into account in determining the insulation technology to be adopted (AIS or GIS);  (b) The implications of each technology for the provision of landscape and	<ul> <li>(a) Justifications for the preference will take into account the following parameters: <ol> <li>Sustainability</li> <li>Cost</li> <li>Environmental/Consents</li> <li>Engineering and Construction</li> </ol> </li> <li>NGET will also consider the requirements of the relevant NGET Policy Statements.</li> <li>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</li> </ul>

No.	Agenda	Question	Response
	Item		
		landform mitigation and for visual amenity to all receptors;  (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  (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?  (e) Confirm without qualification that the proposed NG Substation and all the land subject to CA proposals at Friston in the Applications before the ExA's will serve only EA1N and EA2.	focus on achieving net-zero carbon targets, NGET aspire to own an SF <sub>6</sub> free transmission network. This is driven by:  NGET's commitment to Net Zero at 2050.  NGET's ambition to reduce SF6 emissions by 80% at 2030.  Existing and anticipated future legislation.  (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).  (c) A decision is likely to be made by the end 2021 following a design assessment by NGET's appointed ECI substation contractor.  (d) The draft DCO for each project includes associated development including Work 41 is as follows:  Work No. 41 — a new national grid substation to the north west of

No.	Agenda	Question	Response
	Item		
			Work No. 30 at Grove Wood, Friston and extension of permanent access comprised within Work No. 34.
			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:
			(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.
			(7) Buildings comprised within the national grid substation must not exceed—
			(a) where AIS substation arrangement is used, a height of 6 metres above finished ground level; and
			(b) where GIS substation arrangement is used, a height of 16 metres above finished ground level.
			(8) External electrical equipment comprised within the national grid substation must not exceed a height of 16 metres above finished ground level.

No.	Agenda	Question	Response
	Item		
			(9) The fenced compound area (excluding its accesses) for the national grid substation must not exceed—
			(a) where AIS substation arrangement is used, 44,950 m2; and
			(b) where GIS substation arrangement is used, 16,800 m2.
			(13) The total footprint of the construction consolidation sites comprised within the following
			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.
			(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

not ask the
re potential
r will relate
nd.
r r