

Denise Libretto
Head of Planning
Energy Infrastructure Planning
Department for Business, Energy & Industrial Strategy
Level 3, Orchard 2
1 Victoria Street
London
SW1H 0ET

22nd July 2021

Dear Ms Libretto,

REQUEST FOR A DIRECTION BY THE SECRETARY OF STATE UNDER SECTION 35 OF THE PLANNING ACT 2008 (“PA 2008”) RELATING TO THE GREAT BRITAIN TO NORWAY MULTI-PURPOSE INTERCONNECTOR (CURRENTLY KNOWN AS “CONTINENTAL LINK” AND REFERRED TO BELOW AS THE “PROJECT”)

Thank you for your letter of 9 July 2021, seeking further information about National Grid Ventures’ (“**NGV**”) request for a direction under section 35 PA 2008. We have set out our response below, using the same numbering as in your letter.

- i) The Project could connect UK offshore wind developments of up to 1800MW and Norwegian offshore wind developments of 1800MW. This is because the Project’s high voltage direct current (“**HVDC**”) cables would allow transmission of 1800MW to both the UK and Norway, respectively. At this stage of the Project’s development it is envisaged that the operating model for the MPI would prioritise energy flows from the windfarms, with cross-border flows taking up the remaining capacity on the HVDC link.

By co-ordinating offshore wind and interconnection, MPIs are able to deliver the benefits of both technologies whilst mitigating the impact of new infrastructure on local communities and users of both the terrestrial and the marine environments. NGV is promoting Continental Link as a potential pathfinder project as part of the National Grid Electricity System Operator (“**ESO**”) Pathfinder process. It is intended that the commercial and regulatory positions for this, first of a kind, project will be considered more closely through the OTNR in order to arrive at the optimal solution. Details of the pathfinder submission made by NGV to the ESO can be found in the table below. These clearly demonstrate the reduction in infrastructure possible through this multi-purpose development. The reduction is based on the connection of only one wind farm. Clearly, reductions would be proportionally greater were more wind farms to be connected.

| | Status Quo (Continental Link P2P IC + 1x wind farm) | Continental Link MPI (MPI connecting 1x wind farm) |
|----------------|--|---|
| Landing points | 2 | 1 |

| | | |
|---|---|----------------------|
| Constraint Cost - <i>ESO to carry out System Benefits analysis</i> | Up to £20m in connection costs could be saved for each connection avoided | |
| Land take assumptions | | |
| Onshore: | Total: 170ha | Total: 85ha |
| Converter Stations | 2 (10ha) | 1 (5ha) |
| DC Cable Circuits | 2 (120ha) | 1 (60ha) |
| AC Cable Circuits | 4 (40ha) | 2 (20ha) |
| Offshore: | Total: 10791ha | Total: 8971ha |
| DC Cable Circuits (<i>based on a 140km route to wind farm & a 690km route UK to Norway</i>) | 2 (10790ha) | 1 (8970ha) |
| Platforms (<i>Assuming array cables can feasibly be connected to the Converter platform; if not, AC collector platforms may be required.</i>) | 1(1ha) | 1 (1ha) |

We enclose NGV's submission to NG ESO Pathfinder, which contains further information about the Project.

ii) We can confirm that the Secretary of State has understood the position correctly in relation to those parts of the project that are proposed to be nationally significant infrastructure and those that are proposed to be associated development. The onshore and offshore converter stations and offshore switching station(s) are the principal development, whereas the cables, though large, perform a subordinate function. In response to the Secretary of State's specific questions:

a. The approach taken to associated development is consistent with both section 115(2) PA 2008 and the document *Planning Act 2008: Guidance on associated development applications for major infrastructure projects* ("**Guidance**"). The cabling would satisfy the criteria in section 115(2), as it would:

- be associated with the proposed nationally significant infrastructure, for which development consent would be required if this request for a section 35 direction is granted;
- not consist of or include the construction or extension of one or more dwellings; and
- be a project in the field of energy which would extend into waters adjacent to England up to the seaward limits of the territorial sea and/or a Renewable Energy Zone.

Further, it would satisfy the "associated development principles" contained in paragraph 5 of the Guidance, as it would:

- have a direct relationship with the principal development, since the cabling will enable the operation of the principal development;
- be subordinate the principal development, as the cabling is not an aim in itself and is only required as a consequence of the construction of the principal development;
- not be a source of additional revenue for the principal development, as the cabling is only required to enable the principal development and has no other economic purpose; and
- be proportionate to the nature and scale of the principal development, as the scale of the cabling is limited to that required to enable the principal development to function.

The proposed cabling is typical of the type of development brought forward alongside principal development in other projects in the field of energy. NGV notes that "connections to national, regional or local networks" are given as examples of general types of associated development

in Annex A of the Guidance. The proposed cabling is analogous to such a connection when considered in the context of the principal development. Additionally, “overhead/underground lines” are cited as examples of associated development in relation to offshore generating stations in Appendix B of the Guidance. Again, the cabling proposed in this case is analogous to such lines when considered in the context of the principal development. The cabling performs essentially the same function in the context of the Project as the connections and lines referred to in Annexes A and B do in relation to electricity networks and offshore generating stations, respectively.

- b. NGV considers that the onshore converter station, one or more offshore platforms housing switching stations and one or more offshore platforms housing converter stations (collectively, “**Development**”) are of national significance. As noted in our letter of 28 June 2021, the Project would have the capacity to transmit 1.8GW of electricity to the UK, enough to provide power for 1.8 million homes. This means that the Development would enable the conversion and transmission of vastly more electricity than a generating station would be required to generate in order to be a nationally significant infrastructure project by virtue of section 15 PA 2008 (50MW and 100MW for onshore and offshore generating stations, respectively). NGV submits that this alone demonstrates the Development’s national significance. In addition:
- the Development would enable the conversion and transmission of more electricity than the Nautilus Interconnector (1.4GW) and only marginally less than the AQUIND Interconnector (2GW), both of which were judged by the Secretary of State to be nationally significant;
 - the Development, via the offshore switching station(s) and offshore converter station(s), will enable multiple wind farms to be connected at a single point, helping to resolve the continuing challenges of individual connections being required for new wind farms;
 - the Project as a whole, of which the Development is the principal part, will enhance security of supply in the UK, which is a Government objective at the national level; and
 - the Project as a whole is likely to require multiple consents or authorisations and may have effects across an area wider than a single local authority area. It would, in consequence, benefit enormously from the single, unified authorisation process offered by PA 2008.

For all these reasons, as well as those set out in our letter of 28 June 2021, NGV believes that the Development is of national significance.

We look forward to hearing from you. Should the Secretary of State have any further queries, please do not hesitate to let us know.

Yours sincerely



Liz Wells
Consents Manager – National Grid Ventures

Enc. NGV's submission to ESO Pathfinder Process for Continental Link