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Head of Energy Infrastructure Planning
Department for Energy Security & Net Zero
1 Victoria Street
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17th April 2025

Ref: EGL5-NGET-LAN-CON-011-A

Dear Sir/Madam,

REQUEST FOR A DIRECTION BY THE SECRETARY OF STATE UNDER SECTION 35 OF THE PLANNING ACT 2008 RELATING TO DEVELOPMENT FORMING PART OF THE EASTERN GREEN LINK 5 (EGL5) PROJECT

Overview

This letter is a formal request by National Grid Electricity Transmission ("NGET") to the Secretary of State for Energy Security and Net Zero ("Secretary of State") for a direction under Section 35 of the Planning Act 2008 ("PA 2008") with respect to the Proposed Development set out below. The Proposed Development forms part of NGET's proposed EGL 5 project (**"EGL 5"** or **"the Project"**), a transmission and reinforcement project comprising a converter station in Lincolnshire, England (the 'Proposed Development' element), connecting end to end with Scottish landfall via a high voltage direct current ("HVDC") submarine and underground electricity cable link.

The Project is being jointly developed by NGET and Scottish and Southern Electricity Networks Transmission ("SSEN-T") and is needed to significantly increase the capability of the existing National Electricity Transmission System ("NETS") to enable the north-south flow of power between Scotland and England from new and future offshore windfarm generation projects. The Project is a key part of delivering the Government's legally binding accelerated Net Zero and Energy Security ambitions.

The English onshore elements of EGL 5 would be routed and sited through two Authorities, East Lindsey District Council and Lincolnshire County Council. The Project has been introduced to each Local Planning Authority (LPA). NGET have also engaged with both authorities on the proposed consenting approach and a summary of their responses and letters of support to NGET seeking a s.35 Direction under the Planning Act 2008 are included with this letter.

These letters refer to AC4, which is the previous project name for EGL5. The name change from AC4 to EGL5 occurred following the issue of these letters, but the Project and the Proposed Development remains the same.

The Project

EGL 5 is a new 2GW 525kV subsea HVDC link between Scotland and England. The key onshore and offshore elements of the Project include:

- Offshore high voltage direct current (HVDC) cables. In English waters the cable would be approximately 415 km long (In English and Scottish waters the total cable length would be up to 555 km)
- A transition joint bay (TJB) which will enable the connection of the offshore and onshore HVDC underground cable, located onshore and underground near to the proposed cable landfall at Anderby Creek on the Lincolnshire coastline
- Underground HVDC cable running approximately 9 km from the proposed landfall at Anderby Creek on the Lincolnshire coast to a converter station in East Lindsey
- One converter station located either to the north-east of Bilsby or north west of Hutton in East Lindsey, Lincolnshire
- Underground high voltage alternating current (HVAC) cable running approximately 3 km to connect the proposed converter station to the proposed Lincolnshire Connection Substation (LCS) (please note that LCS is being proposed as part of NGET's separate Grimsby to Walpole project).

Proposed Development in respect of which a Section 35 Direction is Requested

NGET requests that the onshore converter station in Lincolnshire is directed as nationally significant for the reasons set out below.

The converter station is the 'Proposed Development', which would constitute the 'authorised development' in a development consent order.

Of the remaining elements of the Project:

1. The Scottish onshore and offshore works are not located in England and as such will be consented through Scotland's town and country planning and marine licensing legislation;

2. The English offshore works may be dealt with via a deemed marine licence under the Planning Act 2008;

3. The other English onshore works are necessary to support both the operation of the Proposed Development and the Project and will include significant underground onshore HVDC and HVAC cables, transition joint bays where the HVDC cables make landfall, together with works necessary to provide environmental mitigation.

NGET does **not** consider that it is necessary or appropriate to treat items 2 and 3 above – or any other matter associated with the Project - as part of the Proposed Development, as these are elements which would ordinarily be considered as associated development under Section 115 of the PA 2008 and under current 'Guidance on associated development applications for major infrastructure projects' (DCLG 2013).

Consistent with the approach of the Secretary of State in the EGL3 and 4 Section 35 Directions (29 February 2024), the Xlinks (26 September 2023) and Continental Link (18 August 2021) Section 35 Directions, NGET will refine and define the associated development as the Project progresses, and if necessary seek confirmation from the Secretary of State at a later date that the authorised development which is the subject of the DCO application is consistent with that for which any Direction is given.

Reasons to Issue the Direction

The tests that the Secretary of State must apply in considering whether to make a direction in this case are that the:

- Proposed Development is or forms part of a project (or proposed project) in the field of energy (PA 2008 S.35(2)(a)(i))

- Proposed Development will be wholly in England or waters adjacent to England up to the seaward limits of the territorial sea, and/or is within a Renewable Energy Zone (PA 2008 S.35(2)(b), with reference to S.35(3)(a) and S.35(3)(b)); and

- Secretary of State thinks the Project is a project of national significance (PA 2008 S.35(2)(c)) either by itself or when considered with one or more other projects (or proposed projects) in the same field.

Neither the Proposed Development nor the Project fall within the existing definition of a 'nationally significant infrastructure project' (S.14 to S.30 PA 2008). This request is therefore a qualifying request within the meaning of S.35ZA of the PA 2008. NGET can also confirm that no application for a consent or authorisation mentioned in S.33(1) or (2) has been made in relation to the Proposed Development.

Field of Energy (PA 2008 S.35(2)(a)(i))

The proposed Project is in the field of energy as it is for the purpose of electricity conversion and transmission. The Proposed Development forms an essential part of the Project, being the infrastructure that will convert the transmitted electricity for onward transmission and distribution in England.

Wholly in England (PA 2008 S.35(2)(b))

The Proposed Development would be located in Lincolnshire, England.

Although not part of this request, any associated development would also be located in England or waters adjacent to England up to the seaward limits of the territorial sea, and/or within a Renewable Energy Zone (but not in any part of a Renewable Energy Zone in relation to which the Scottish Ministers have functions). As noted above, the offshore English elements may be consented via a deemed marine licence, and the Scottish onshore and offshore elements would be consented separately.

National Significance (PA 2008 S.35(2)(c))

NGET considers the Proposed Development, and the proposed Project of which it forms part, to be of national significance for the reasons set out below:

1) The Proposed Development is necessary to deliver the proposed Project, which is critical for providing an additional 2GW of transmission capability between Scotland and England required as part of NGET's Great Grid Upgrade programme. The Great Grid Upgrade is the largest overhaul of the electricity transmission grid in generations and is required to meet the legally binding Net Zero 2050 target under the Climate Change Act 2008, and British Energy Security ambitions.

2) A critical component of the strategy for meeting the 2050 target is the plan to connect 50 GW of new offshore wind generation to the UK electricity grid by 2030, as set out in the British Energy Security Strategy (2022). Due to the growth in the volume of renewable energy, in particular offshore wind, connecting to the electricity transmission network in Scotland and on the east coast of England, there is a requirement to significantly and urgently upgrade this network. This is further supported by the Clean Power 2030 Action Plan (2024) which recognises the need to strengthen electricity transmission infrastructure.

3) This requirement is addressed in the Electricity System Operator's Pathway to 2030 Holistic Network Design (HND) which sets out a single, integrated design that supports the large-scale delivery of electricity generated from offshore wind, taking power to where it is needed across Great Britain. The HND facilitates the connection of 23GW of wind, helping to deliver the Government's ambition for 50GW connected offshore wind by 2030.

4) Projects that are critical to delivering that consumer benefit, such as the proposed Project, are recognised in the HND as "Essential", and have been identified as requiring accelerated delivery timescales by their designation by Ofgem as Accelerated Strategic Transmission Investment (ASTI) (December 2022)

EGL 5 has been recognised as provisionally being a project which will sit within the ASTI funding process, which means that the Project will benefit from a streamlined regulatory approval and funding process, in recognition of the urgency of the national need that it helps to address. The Clean Power 2030 Action Plan recognises the importance of ASTI projects and the importance of accelerating the delivery of such projects.

5) This need is reflected in National Policy Statement for Electricity Networks Infrastructure (NPS EN-5), which identifies a policy imperative in support of offshore-onshore transmission. In addition, the National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) states that there is a 'critical national priority' for nationally significant offshore wind development, including supporting onshore and offshore network infrastructure, and related network reinforcements.

6) NPS EN-5 goes on to clarify that this includes infrastructure identified in the HND. As noted above, the Project is identified in the HND and will support transmission of electricity from offshore wind infrastructure and other developments, therefore if designated in the current form would be supported as a project of 'critical national priority'.

7) Further, Overarching National Policy Statement for energy (NPS EN-1) sets out the challenge of the substantial volume of onshore reinforcement works needed to meet decarbonisation targets. It states that "National Grid ESO forecasts that over the next decade the onshore and offshore transmission network, some of which is located offshore will require a doubling of north-south power transfer capacity due to increased wind generation in Scotland" The Project will play a key role in increasing north-south transfer capacity between England and Scotland and therefore meeting targets.

8) The Project's onshore footprint is located in Lincolnshire, a critical region for a number of proposed strategic improvements to the NETS under the HND – for example NGET's North Humber to High Marnham and Grimsby to Walpole overhead line upgrade projects and NGET's EGL3 and EGL4 projects; as well as Total Energy's Outer Dowsing Offshore Wind Generating Station.

9) The Proposed Development is an important part of the overall HND strategy to ensure there is sufficient capacity to safely and efficiently transport and convert the new generation of electricity and connect the developers whose projects will generate it

10) The Project's capacity of 2GW is nationally significant both in terms of its contribution to the overall target required but also when compared with the threshold for a generating station under S.15 PA 2008 (50MW and 100MW for onshore and offshore generating stations, respectively).

11) Physically, the Proposed Development would comprise a large warehouse-type structure and would occupy an area of approximately 10ha, with buildings attaining a maximum height of up to 30m. The converter station would comprise one of the most substantial elements of the Project, in terms of its physical scale and dimensions, the complexity of plant, equipment and process, and its purpose in converting 2GW of power from HVDC to HVAC.

12) Converter stations require multiple complex pieces of technology to convert the HVDC from the generating station into HVAC electricity that can be transmitted and distributed onshore. These components typically include a converter hall, converter transformers, switchgear and busbars,

lightning towers, ancillary plant such as cooling bank and stand-by back-up emergency generators, and a control centre.

In summary, the Proposed Development is the key component of a Project, which has been determined to be an HND 'Essential' project for achieving legally binding Net Zero targets, has been provisionally granted ASTI 'accelerated' status by Ofgem for that reason and by facilitating the transmission of low carbon energy is supported as a 'critical national priority' by the newly designated NPSs.

The need for the Project, and the national benefits it will deliver, is such that, either by itself or when considered with "one or more other projects (or proposed projects) in the same field", the Proposed Development forms part of a project that is of national significance.

Additional Reasons to Issue the Direction

In addition to the above, NGET notes that consideration of the Proposed Development through an application under the PA 2008 would bring numerous benefits for both the Project and stakeholders. It would provide the certainty of a single consenting and land rights acquisition process and a fixed timescale for determination, including the ability to include a deemed marine licence for the English offshore works. An application under the PA 2008 would also enable consideration of the Project via the same consenting regime as energy NSIPs in the vicinity including NGET's proposed Grimsby to Walpole Upgrade project and EGL 3 and 4 projects, enabling the applications to be determined by the same decision maker. This would also avoid the potential for confusion amongst the LPAs and stakeholders, that could result from different projects of a similar scale in close proximity to each another, being considered concurrently but under different consenting regimes with different processes.

Conclusion

As such, NGET respectfully invites the Secretary of State to direct that the Proposed Development, that is, the converter station in Lincolnshire, should be treated as development for which a development consent order is required. We note that Overarching National Policy Statement 1 (NPS EN-1), National Policy Statement for Renewable Energy Infrastructure (NPS EN3) and the National Policy Statement for Electricity Networks Infrastructure (NPS EN-5) designated on 17 January 2024 will apply and have effect in respect of the development in your direction.

Yours sincerely

[redacted]

Stephen Mathers

Project Director – Eastern Green Link 5

Attached:
Host Authority Copies of Letters Received (Lincolnshire County Council and East Lindsey District Council)