Eastern Green Link 3 and Eastern Green Link 4

PINS Pre-Application Planning Services – Programme Document

September 2025

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1. Introduction

1.1 Introduction

1.1.1. This Programme Document has been prepared by National Grid Electricity
Transmission plc (NGET) as a requirement under the Nationally Significant
Infrastructure Projects: 2024 Pre-application Prospectus in respect of the Eastern
Green Link 3 (EGL 3) and Eastern Green Link 4 (EGL 4) Projects (the Projects).

1.2 Purpose and Structure

- 1.2.1. This Programme Document sets out the timetables and describes the activities necessary for an effective pre-application process, including the level of pre-application service requested from the Planning Inspectorate (PINS), and consultation with various parties required under the Planning Act 2008 (as amended) (the PA 2008) as per the requirements for a Programme Document set out in Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus. It is expected that this document will be updated at key milestones throughout the pre-application process as the Projects are further developed.
- 1.2.2. This Programme Document is structured as follows:
 - Section 1: Introduction and purpose and structure of the document
 - Section 2: Background to the Projects
 - Section 3: PINS Pre-application Service
 - Section 4: Expected submission timeframe
 - Section 5: Timeframe of the pre-application process
 - Section 6: Main issues for resolution
 - Section 7: Engaging with statutory consultees and Local Planning Authorities
 - Section 8: Pre-application risks and how these are tracked and managed
 - Section 9: Approach to Preliminary Environmental Information (PEI)

2. Background to the Projects

2.1 Overview of the Projects

- 2.1.1. NGET is planning to enhance the electricity network with proposals for EGL 3 and EGL 4 two new primarily offshore high voltage electricity links between Scotland and England. EGL 3 and EGL 4 are needed as the existing transmission network does not have enough capacity to securely and reliably transport the increasing amount of energy generated in Scotland and Scottish waters.
- 2.1.2. The infrastructure for EGL 3 and EGL 4 within England and English waters have been split into two geographical parts, hereafter referred to as 'the English Onshore Scheme' and 'the English Offshore Scheme', collectively termed 'the Projects'. It is these parts of EGL 3 and EGL 4 which are the subject of this Programme Document and will be subject to a single Development Consent Order (DCO) application.

Figure 1 – Image to show the draft Order Limits and the England/Scotland Land and Maritime Boundaries



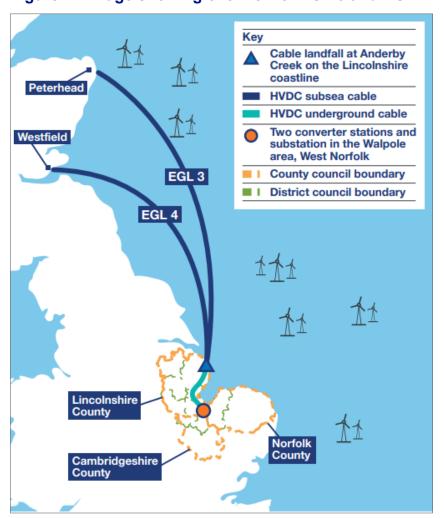


Figure 2 - Image showing overview of EGL 3 and EGL 4

2.1.3. The elements of the Projects that will be subject to this DCO application are:

English Onshore Scheme

Converter Stations (the principal development)

- EGL 3: A new converter station, in the vicinity of the existing Walpole substation in King's Lynn and West Norfolk.
- EGL 4: A new converter station, in the vicinity of the existing Walpole substation in King's Lynn and West Norfolk.

High Voltage Direct Current (HVDC) underground cables

- Both EGL 3 and EGL 4 will have their landfall approximately 1.2 km north of Anderby Creek in East Lindsey on the Lincolnshire Coast. The onshore HVDC underground cables from landfall will include:
 - EGL 3: Approximately 100 km of new underground HVDC cable, from the landfall point (at Anderby Creek) to the proposed EGL 3 converter station in the vicinity of the existing Walpole substation in King's Lynn and West Norfolk.
 - EGL 4: Approximately 100 km of new underground HVDC cable, from the landfall point (at Anderby Creek) to the proposed EGL 4 converter station in the vicinity of the existing Walpole substation in King's Lynn and West Norfolk.

High Voltage Alternating Current (HVAC) underground cables

- EGL 3: Approximately 5 km of new underground HVAC cable, between the EGL 3
 Walpole converter station and a new 400 kV Walpole substation in the vicinity of
 the existing Walpole substation in King's Lynn and West Norfolk.
- EGL 4: Approximately 5 km of new underground HVAC cable, between the EGL 4
 Walpole converter station and a new 400 kV Walpole substation in the vicinity of
 the existing Walpole substation in King's Lynn and West Norfolk.

New Walpole Substation

 A new 400 kV substation (in proximity to the existing Walpole substation in King's Lynn and West Norfolk (described as the 'new Walpole substation' or 'Walpole B substation'). The new Walpole substation is a common connection point for both the EGL 3 Project, the EGL 4 Project and the Grimsby to Walpole Project (which will be subject to a separate DCO application by NGET). The need for this new substation exists as a part of either EGL 3 and EGL 4 or the Grimsby to Walpole Project and therefore will form part of both respective DCOs.

Overhead Lines

 Supplementary works to existing 400 kV overhead lines and local changes to the lower voltage distribution networks to facilitate the construction of the new onshore transmission connections in England.

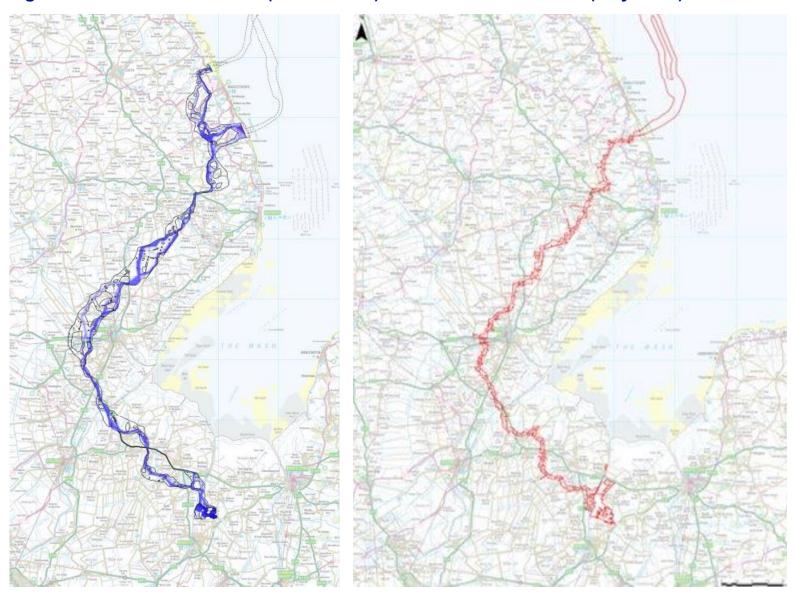
English Offshore Scheme

- EGL 3: Approximately 436 km of subsea HVDC cable from the landfall at Anderby Creek, Lincolnshire, England, to where it meets the marine boundary between English and Scottish waters. The submarine cable system would consist of two HVDC cables and a fibre optic cable for control and monitoring purposes.
- EGL 4: Approximately 425 km of subsea HVDC cable from the landfall at Anderby Creek, Lincolnshire, England, to where it meets the marine boundary between English and Scottish waters. The submarine cable system would consist of two HVDC cables and a fibre optic cable for control and monitoring purposes.

Host Authorities

- 2.1.4. The host local authorities for the Projects are:
 - Lincolnshire County Council;
 - South and East Lincolnshire Councils Partnership (representing Boston Borough Council, East Lindsey District Council & South Holland District Council);
 - Norfolk County Council;
 - King's Lynn and West Norfolk Borough Council;
 - Cambridgeshire County Council; and
 - Fenland District Council.
- 2.1.5. The evolution of the Projects between non-statutory and statutory consultation is illustrated in Figure 3 below.

Figure 3 - Graduated Swathe (March 2024) and Draft Order Limits (May 2025)



2.2 Planning Act 2008

- 2.2.1. The proposed Converter Stations of the EGL 3 and EGL 4 Projects have been independently directed as energy projects within the scope of Section 35 of the PA 2008 by the Secretary of State for Energy Security and Net Zero. As described in the relevant Directions, the Converter Stations are treated as development for which development consent under the PA 2008 is required.
- 2.2.2. Under Section 115 of the PA 2008, development consent may also be granted for associated development, which for the Projects includes HVDC underground cables, HVAC cables, the New Walpole Substation, and works to existing Overhead Lines (as described at section 2.1 above).
- 2.2.3. Further, the PA 2008 enables an applicant for a DCO to apply for a 'Deemed Marine Licence' (DML) as part of the DCO process by virtue of Section 149A of the PA 2008 which was inserted by the Marine and Coastal Access Act 2009. It is intended that the DCO will contain two separate DMLs: one for the EGL 3 English Offshore Scheme, and one for the EGL 4 English Offshore Scheme (as described at section 2.1 above).

3. PINS Pre-application Service

- 3.1.1. As agreed with PINS, the Projects benefit from the 'Standard' level of pre-application service. It is considered the standard level of service provides the Projects with an appropriate and proportionate level of pre-application engagement with PINS, reflective of the scale and nature of the Projects and NGET's level of experience as an applicant.
- 3.1.2. The Projects are similar to others within the Great Grid Upgrade¹ that are further developed in their programme, and as such, lessons learnt and expertise in producing documentation are available to enable the application to be of a standard acceptable for examination.
- 3.1.3. The standard level of service provides the Projects with project update meetings, draft DCO documentation review and risk review.

¹ <u>https://www.nationalgrid.com/the-great-grid-upgrade</u>

4. Expected submission timeframe

- 4.1.1. The Projects undertook Statutory Consultation from 13 May 2025 23 June 2025. The Statutory Consultation documents are available to view on the Projects website².
- 4.1.2. Consultation response analysis and associated design development are currently ongoing.
- 4.1.3. It is anticipated that the DCO will be submitted in August 2026. NGET will provide PINS with regular updates regarding the submission date as the Projects progress.

² https://www.nationalgrid.com/the-great-grid-upgrade/eastern-green-link-3-and-4/document-library

5. Timeframe of the pre-application process

5.1.1. An anticipated timeline for the pre-application process is set out in Table 1 below. The pre-application timeframe will be refined, and further detail added as required and as the period of submission draws closer.

Table 1 - Anticipated application submission timeframes for the Projects

| Activity | Timeframe (Status) |
|--|--|
| Non-statutory Consultation | 23 April to 15 July 2024 (Complete) |
| Inception Meeting with the Planning Inspectorate | 24 May 2024 (Complete) |
| EIA Scoping Request | 26 July 2024 (Complete) |
| EIA Scoping Opinion | 05 September 2024 (Complete) |
| Project Update Meeting with the Planning Inspectorate | 16 September 2024 (Complete) |
| Consultation with host Local Authorities on Draft Statement of Community Consultation (SOCC) | 6 March to 3 April 2025 (Complete) |
| Project Update Meeting with the Planning Inspectorate | 1 April 2025 (Complete) |
| Statutory Consultation | 13 May 2025 – 23 June 2025 (Complete) |
| Further Project Update Meeting with the Planning Inspectorate | 4 September 2025 (Complete) |
| Project Update Meeting with PINS (following Design Freeze 3) | February 2026 (Tentatively Planned) |
| Adequacy of Consultation Milestone | Q2 2026 (Planned) |
| PINS review of Draft DCO Documentation | Q2 2026 (Planned) |
| Project Update Meeting with PINS (following draft DCO document review) | May 2026 (Tentatively Planned) |
| DCO Submission | August 2026 (Planned) |

6. Main issues for resolution

- 6.1.1. In developing the Projects, NGET's approach is mindful of the issues which are likely to be relevant to projects of this type identified generically in the Overarching National Policy Statement (NPS) for Energy (EN-1), and the NPS for Electricity Networks Infrastructure (EN-5), such as air quality, landscape and visual effects, socio economic impacts etc.
- 6.1.2. NGET has completed one round of Non-Statutory Consultation, and Statutory Consultation concluded on 23 June 2025. Consultation response analysis and associated design development are currently ongoing.
- 6.1.3. Table 2 sets out the general issues identified at this stage (in line with the generic issues identified in NPS EN-1 and EN-5) and explains how NGET is currently seeking to address each matter. Further consideration will be given to these matters, and any others which arise, pending review of views of communities and stakeholders in relation to the emerging proposals following the Statutory Consultation.
- 6.1.4. As Statutory Consultation has now been completed, references to the Preliminary Environmental Information Report (PEIR, May 2025)³ have been included as an aide to a better understanding of the issues and their context (however, it is noted that the PEIR is one but not the only document relevant to the Statutory Consultation and the issues being addressed).
- 6.1.5. The PEIR presents a preliminary assessment of the likely significant environmental effects of the Projects, to inform Statutory Consultation. The purpose of the PEIR is to enable members of the public, consultation bodies, and other stakeholders, to develop an informed view of the preliminary likely significant effects of the Project and comment on aspects of interest.
- 6.1.6. The application for a DCO will be supported by documents explaining the consideration of issues arising from consultation and the application of the NPS's. An Environmental Statement will set out consideration of the Projects' environmental effects.

³ https://www.nationalgrid.com/the-great-grid-upgrade/eastern-green-link-3-and-4/document-library#4257225834-179637554

Table 2 – Main Issues for Resolution

| Issue | Description of Issue |
|--|---|
| Agricultural Land | Volume 1, Part 2, Chapter 11 of the PEIR considers potential effects of the Projects on Agriculture and Soils including agricultural land quality (as defined by the Agricultural Land Classification (ALC) system), soils and their function and agricultural landholdings. |
| | Parts of the draft Order Limits include Grade 1 and 2 best and most versatile (BMV) agricultural land, which is considered as higher grade agricultural land. The preliminary findings identified that both the temporary and permanent loss of BMV land have the potential to have significant effects on agricultural land. |
| | Further assessments are being carried out and feedback from the consultation is being considered. The routing and siting will avoid where possible the loss of higher grade agricultural land. Mitigation measures will also be explored for any higher grade agricultural land affected. |
| Determining final options for the cable route and Converter Stations locations | Volume 1, Part 1, Chapter 4 of the PEIR sets out the description of the Projects. In some locations several route/siting options for the underground HVDC cable route were taken through into Statutory Consultation. These include: |
| | A north and south cable route option north of Sibsey; |
| | An east and west cable route option at Hubbert's Bridge; |
| | A north and south cable route option at Cowbridge; |
| | A north, central and south cable route option at the River Nene; and |
| | • Four options at Walpole for the siting of the Converter Stations (Options A, B, C and D). |
| | The different options can be seen on the English Onshore Scheme Plans published as part of the Statutory Consultation. ⁴ |
| | Further assessment of the above optionality is ongoing, as NGET seek to decide on a final option for DCO submission, taking into account feedback from the Statutory Consultation. |

 $^{^{4} \, \}underline{\text{https://www.nationalgrid.com/sites/default/files/documents/2025-05/English\%20Onshore\%20Scheme\%20Plans\%20\%281\%29_0.pdf}$

| Issue | Description of Issue |
|--|--|
| Determining options for the movement of construction material to and from the Order Limits | In line with Section 5.14 of NPS EN-1 and Department for Transport Water Preferred Policy Guidance, design work is being undertaken to assess various combinations of transport to move construction material directly to site to reduce the volume of construction traffic on the strategic and local road network. Four Options are being considered: Road Only Road and Rail |
| | Temporary Quay |
| | The use of existing Port and Road |
| | The conclusions of this design appraisal will determine the preferred option to be taken forward to transport construction material to site and will be included in the Alternatives Chapter of the Environmental Statement submitted with the DCO application. |
| Historic Environment | Volume 1, Part 2, Chapter 7 of the PEIR considers potential effects of the Projects on Cultural Heritage. The proposed siting of the Substation is in proximity to a Moat Field sited to the west of West Drove North at Walpole. Moat Field was subject to an application to be designated as a scheduled monument and has now been designated. Effects on other heritage assets in proximity to the Projects are also considered in the PEIR, and the preliminary assessment identifies that the Projects have the potential to significantly impact cultural heritage assets. Further design works will be undertaken to explore options to reduce and mitigate potential impacts to historic assets, alongside consideration of feedback received at Statutory Consultation. |
| Landscape and Visual | Volume 1, Part 2, Chapter 8 of the PEIR considers potential effects of the Projects on Landscape and Visual amenity. A small part of the Lincolnshire Wolds National Landscape falls within the draft Order Limits. Whilst the cables will be sited underground, construction impacts will be considered and mitigated where possible to reduce the visual impact on this National Landscape during the construction period. However, the PEIR concludes that there would not be significant effects on the Lincolnshire Wolds as the part of the National Landscape impacted would be small and construction works would be small in scale and size, and short term and temporary in nature. Once |

| Issue | Description of Issue |
|---------------------------------|---|
| | construction works were complete there would be no significant effects as the Projects would comprise an underground cable at this location and there would be very few signs of development above ground during operation. |
| | The PEIR identifies that only Options C and D for the Walpole Converter Stations are likely to result in permanent significant adverse effects on the character of the landscape. In terms of effects on visual amenity, potentially significant adverse effects are considered likely on receptors with views of the construction works and permanent above ground elements of the English Onshore Scheme. |
| | Further assessment and design work on the proposed Converter Stations is ongoing as NGET seek to decide on a final option for DCO submission, as is design work and further assessment for the Substation at Walpole, taking into account the specific character features of the landscape, and feedback received at Statutory Consultation. NGET has begun working on Design Principles and will engage with the LPAs on these. |
| Noise and Vibration | The potential interaction between the Projects and the potential impact on noise and vibration to human and ecological receptors is assessed in Volume 1, Part 2, Chapter 13 of the PEIR. |
| | The PEIR concludes that there could be likely adverse operational and construction noise effects associated with the Converter Stations and Substation. |
| | Further design work is currently being undertaken to determine the preferred siting for the Converter Stations in Walpole (Options $A-D$) with further noise assessments and mitigation being considered to reduce the potential noise from the Converter Stations and Substation as far as feasibly possible. |
| National Trust Inalienable Land | The proposed cable route will pass through Inalienable Land at Gunby Hall. NGET is engaging with the National Trust to seek agreement on the proposals. |
| Crown Land | The proposed cable route will pass through some Crown Land. NGET is engaging with the Crown Estate to seek agreement on the proposals. |
| Traffic and Transport | Volume 1, Part 2 Chapter 12 of the PEIR considers potential effects of the Projects on Traffic and Transport. |

| Issue | Description of Issue |
|---|--|
| | The PEIR identifies that there would be potentially significant effects during the construction phase of the Projects on Traffic and Transport. As such, further assessments are being carried out and careful consideration is being given regarding the routing and impacts of construction traffic, particularly in the Walpole area. Feedback from Statutory Consultation is being considered. |
| Interaction with other Committed Developments / | Volume 1, Part 4, Chapter 28 of the PEIR sets out the approach to assessing cumulative effects which may arise as a result of the construction and operation of the Projects. |
| Cumulative and in-combination effects | Several other development proposals are committed along the cable route and within the Walpole area, including NGET's Grimsby to Walpole Project. The cumulative and in-combination effects are being carefully considered by NGET, alongside feedback received at Statutory Consultation. |

7. Engaging with statutory consultees and Local Planning Authorities

- 7.1.1. Since the end of 2023, regular meetings have been arranged and held with the relevant host Local Planning Authorities (LPAs) in order to introduce the EGL 3 and EGL 4 Projects and seek views on emerging consultation, consenting and design matters.
- 7.1.2. These regular project meetings will continue with all host authorities throughout the pre-application stage. NGET will be entering into Planning Performance Agreements (PPAs) with all host authorities and engage thereafter in accordance with the details set out within these. The relevant host authorities include:
 - Lincolnshire County Council;
 - South and East Lincolnshire Councils Partnership (representing Boston Borough Council, East Lindsey District Council & South Holland District Council);
 - Norfolk County Council;
 - King's Lynn and West Norfolk Borough Council;
 - Cambridgeshire County Council; and
 - Fenland District Council.
- 7.1.3. It is noted that within the early design stages, the draft Order Limits were in proximity but not within the administrative boundaries of Cambridgeshire County Council and Fenland District Council. Thus, NGET held introductory meetings only with these local authorities in the first instance. They were later invited to monthly meetings following changes to the design of the Projects which confirmed their status as a host authority, due to a shift of the draft Order Limits into their authority boundaries.
- 7.1.4. The local authorities were consulted on the strategy for Non-statutory Consultation prior to its launch. The host and neighbouring local authorities were also consulted on the SOCC, prior to Statutory Consultation. The final SOCC, which has considered the feedback received, is published on the Projects' website.⁵
- 7.1.5. PPAs serve as a formal framework to guide effective collaboration between NGET and each host authority during the pre-application process. By setting out clear commitments, timelines, and expectations for engagement, PPAs help coordinate resources and facilitate timely decision-making, ensuring that feedback on emerging design and consenting matters is well integrated. The agreements also support transparency and accountability, enabling all parties to track progress and address challenges collaboratively. This structured approach is designed to promote a constructive and proactive planning environment, benefiting both the project and the involved authorities.
- 7.1.6. Discussions regarding setting up a PPA with each LPA have taken place, and letters of intent have been issued where relevant. As of August 2025, some PPAs have

⁵ https://www.nationalgrid.com/document/558661/download

been signed, and the remaining are expected imminently. Following the S42 Statutory Consultation, some of the PPAs are currently being revised to implement amended costs.

- 7.1.7. Draft Engagement Plans have been shared with the LPAs and are being implemented. The Engagement Plans:
 - Set out an approach for engaging with LPAs on planning and Environmental Impact Assessment (EIA) matters, including towards development of Statements of Common Ground (SoCGs) and Principal Areas of Disagreement (PADs).
 - Assist LPAs with their resource planning for the Projects;
 - In support of the above, provide LPAs with a look ahead to when key planning and EIA activities are programmed to take place, including proposed technical meetings and thematic working groups;
 - Assist all parties in agreeing a PPA.
- 7.1.8. In addition to relevant LPAs, NGET is engaging with other relevant statutory consultees⁶ through Statutory Consultation and technical meetings. This includes but is not limited to:
 - Natural England
 - The Environment Agency
 - Historic England
 - Marine Management Organisation
 - Highways England.

7.1.9. A programme of engagement with matters to be discussed with statutory consultees has been developed, and NGET will continue to engage in accordance with this programme.

⁶ As per the Regulation 11 list attached at Appendix 1 of the Scoping Opinion which was received in September 2024 (https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0210003-000079-EGLK%20-%20Scoping%20Opinion.pdf)

8. Pre-application risks and how these are tracked and managed

8.1.1. A summary of the pre-application risks identified at this stage and how these are tracked and managed is provided at Table 3 below.

Table 3 – Risks to achievement of the pre-application stage

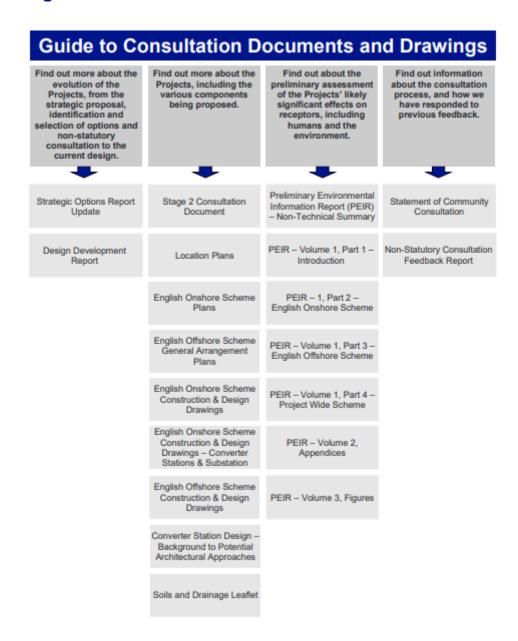
| Risk | Description of Risk | Tracking and Managing Risk |
|---|---|--|
| Limited local authority resources which could limit their ability to engage with the proposals. | LPAs may have limited resources to have effective communication throughout the preapplication process for the DCO. | PPAs are to be entered into with the relevant LPAs to ensure that resource allocation is managed to have effective dialogue. Meetings have commenced with the LPAs to discuss their feedback. |
| Limited statutory consultee resources which could limit their ability to engage with the proposals. | Statutory consultees may have limited resources to have effective communication throughout the pre-application process for the DCO. | At present a service level agreement (SLA) is in place between Natural England and National Grid and relevant Statutory Advice Service maybe be entered into where resource is not covered under an SLA. A cost recovery agreement is in place with the Environment Agency and an Extended Advisory Service agreement has been drafted with Historic England. Other cost recovery agreements will be put in place for relevant stakeholders to help enable effective dialogue. The introduction of cost recovery will be engaged with positively, and engagement strategies will be mapped out on an ongoing nature. NGET has also started setting up Technical Working Groups to bring relevant stakeholders together to discuss relevant topic areas in an efficient and collaborative manner. |

| Risk | Description of Risk | Tracking and Managing Risk |
|--|---|---|
| Number of DCO and third party planning applications proposed within same geographical area and impact on resource/capacity within stakeholder organisations to engage effectively. | Local authorities and statutory consultees are seeing a significant increase in proposed DCOs and other applications in this region. Some of these local authorities have already advised that they are resource-constrained which may result in delays to the receipt of formal inputs to the pre-application stage. | Use of PPAs/charging schemes and provision of an advanced programme of inputs to help manage the limited resources. |
| Unavailability of district level licensing (DLL) meaning extensive Great Crested Newt (GCN) surveys and a conventional licensing approach are required. | Unavailability of DLL means detailed GCN surveys are required to inform licensing. Mitigation and compensation requirements under the licence could include activities that are seasonally restricted and may have implications for the pre-construction period and construction programme. | Natural England are working with NGET to develop a bespoke approach to licensing that draws on some of the benefits of DLL (notably to address potential concerns to programme that can arise from conventional licensing). Natural England have indicated they are broadly happy with NGET's proposed approach to assessment (desk-based and field survey) for GCN and have welcomed the opportunity to discuss further once more detail on the mitigation and compensation approaches are available. Natural England have agreed to a reduced level of survey effort than would conventionally be required (presence/likely absence via eDNA rather than full population size class assessments). |
| Avian flu outbreak on farms leading to delays in access to some of the route for surveys. | The outbreak of avian flu on some farms means that access to the land is delayed and required surveys cannot be undertaken. | NGET is working actively with the landowners to identify and manage this risk – Risk Assessment Method Statements have been updated accordingly, and biosecurity measures are being employed as required during site work. |

9. Approach to preliminary environmental information

9.1.1. A PEIR has been prepared and is published on the Projects' website as part of the Statutory Consultation materials, which include the following documents, as illustrated in the Guide to Consultation Documents and Drawings published with the consultation materials⁷:

Figure 4 - Consultation materials



 $[\]frac{^7 \text{ https://www.nationalgrid.com/sites/default/files/documents/2025-}{05/Guide\%20to\%20Consultation\%20Documents\%20and\%20Drawings\%20-\%20Rev\%2001\%20-\%20May\%202025.pdf}$

| 9.1.2. | The approach to the PEIR has been informed by the EIA Scoping Report ⁸ issued to the Planning Inspectorate in July 2024, and the Scoping Opinion which was received in September 2024. |
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 $^{^8 \} https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0210003/documents?stage-pre-application=Environmental%20Impact%20Assessment%20Scoping&itemsPerPage=25$

National Grid plc National Grid House, Warwick Technology Park, Gallows Hill, Warwick. CV34 6DA United Kingdom

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