

Eastern Green Links 3 and 4 NSIP Proposals

To: Environment and Green Investment Committee

Meeting Date: 12 June 2025

From: Deputy Chief Executive and Executive Director of Place and Sustainability

Electoral division(s): Roman Bank & Peckover

Key decision: No

Forward Plan ref: Not Applicable

Executive Summary: This report provides a summary of National Grid Electricity Transmission's (NGET) emerging proposals for Eastern Green Links 3 and 4 (EGL 3&4). These are two new primarily offshore high voltage electricity links and associated onshore infrastructure between Scotland and England. The schemes are in Statutory Consultation from 13 May 2025 to 23 June 2025.

One of the onshore routing options for the high voltage underground cables which NGET are consulting on passes through the Roman Bank and Peckover division, making Cambridgeshire County Council (the Council) a potential host authority for the project. This report provides further information on the proposals and seeks delegated authority to ensure the Council can respond to the Statutory Consultation.

This is a Nationally Significant Infrastructure Project (NSIP) and the applicant will apply to the Secretary of State for a Development Consent Order (DCO). The NSIP process outlined in this report includes associated timescales the Council will be expected to meet, and any associated risks.

The Committee is recommended to delegate powers to officers when there is not enough time to take items to the Environment and Green Investment Committee. This is in line with other NSIP schemes previously presented to the Committee, to ensure deadlines can be met, allowing the Council's submissions to be given their full weight in the NSIP process.

Recommendation: The Committee is recommended to:

- a) Delegate authority to the Executive Director of Place and Sustainability and the Service Director for Environment,

Planning, and Economy to submit Nationally Significant Infrastructure Project (NSIP) related responses as part of the NSIP process on behalf of Cambridgeshire County Council and its regulatory functions, in consultation with the Chair and Vice Chair of the Environment and Green Investment Committee, on occasions where there is not enough time for a report to be delivered to Environment and Green Investment Committee; and

- b) Note that where delegated powers are used, draft responses will be sent to Local Members and the Members of the Environment and Green Investment Committee ahead of submission.

Officer contact:

Name: Alice Tithecott
Post: Consents Programme Manager
Email: alice.tithecott@cambridgeshire.gov.uk

1. Creating a greener, fairer and more caring Cambridgeshire

- 1.1 **Net zero carbon emissions for Cambridgeshire by 2045, and our communities and natural environment are supported to adapt and thrive as the climate changes:** National Grid Electricity Transmission (NGET) is proposing the Eastern Green Link 3 and Eastern Green Link 4 (EGL 3&4) projects as part of The Great Grid Upgrade. This programme of works aims to overhaul the electricity grid, making changes to the current network of overhead lines, pylons, cables, and other infrastructure that transports electricity across the country. It seeks to improve the nation's access to clean electricity from renewable resources. The Great Grid Upgrade is also intended to enable the connection of new offshore wind farms, subsea connections between England and Scotland, and international subsea connections between the UK and other countries across the North Sea. EGL 3&4 are required to securely and reliably transport the increasing amount of renewable energy generated in Scotland and Scottish waters, particularly from offshore wind, to population centres in the Midlands and South of England.
- 1.2 **Places and communities prosper because they have a resilient and inclusive economy, access to good quality public services and social justice is prioritised:** As well as upgrading the existing electrical infrastructure, NGET's proposal has the potential to provide short-term job opportunities for residents in the surrounding area.

2. Background: National Grid's DCO Application

- 2.1 National Grid Electricity Transmission (NGET), part of the National Grid Group, is proposing an enhancement to the electricity network with its EGL 3&4 proposals. These schemes propose two new primarily offshore high voltage electricity links, with converter stations and associated onshore infrastructure between Scotland and England.
- 2.2 In England, the proposed onshore elements of EGL 3&4 would be in the districts of East Lindsey, Boston, and South Holland, in Lincolnshire, and the district of King's Lynn and West Norfolk, in Norfolk.

The proposed onshore infrastructure in England includes:

- Two converter stations located in the Walpole area
 - Co-located underground high voltage direct current (HVDC) cables running from a joint landfall at Enderby Creek to converter stations in the Walpole area
 - Transition joint bays to connect marine and onshore HVDC cables
 - One substation in the Walpole area (also proposed as part of NGET's Grimsby to Walpole project)
 - Underground high voltage alternating current (HVAC) cables to connect the converter stations to the substation
 - Associated works to the existing 400 kV overhead line to enable a connection with the new Walpole substation.
- 2.3 NGET will be seeking consent for the English onshore elements of both Eastern Green Links 3 and 4 via one application to the Planning Inspectorate (PINS) for a Development Consent Order (DCO). Although EGL 3&4 are independent of one another, in effect separate projects, due to their ultimate common connection point in England (the proposed new Walpole substation), NGET have decided to develop them in parallel. In addition to

enabling one DCO application, this coordinated and co-located approach to their routing and siting provides the opportunity to potentially reduce the extent of community and environmental impact and disturbance.

- 2.4 One of the four proposed route options for the underground cabling corridor passes through the Roman Bank and Peckover division in Fenland. As NGET are considering this option, which falls within the County Council's boundary, the Council is a potential host authority for the schemes. Should NGET progress with this option following Statutory Consultation, we will be confirmed as a host authority. If they progress one of the other options which does not pass through Cambridgeshire, the Council will become a neighbouring authority and have less involvement in the scheme. A map of the proposed scheme and the draft order limits can be found in Appendix 3 and Appendix 4.
- 2.5 The schemes are in Statutory Consultation from 13th May 2025 to 23rd June 2025.
- 2.6 Offshore transmission cables, their converter stations, and associated onshore infrastructure do not meet the criteria to be considered Nationally Significant Infrastructure Projects (NSIPs) under the Planning Act, meaning that they are not automatically eligible to be consented via an application for a development consent order (DCO). However, on 1 February 2024 NGET wrote to the Secretary of State to ask that they issue directions on whether the proposed Projects could be treated as nationally significant developments for which development consent is required. On 29 February 2024, the Secretary of State issued directions confirming that the proposed Projects be treated as such, in accordance with section 35(1) of the Planning Act. A DCO is therefore required in order to consent the proposed Projects, which are proposed under a single DCO.
- 2.7 As the Secretary of State for the Department of Energy Security and Net Zero (DESNZ) is the decision-making body for the DCO application, with PINS serving as the Examining Authority, Cambridgeshire County Council does not have the authority to determine the outcome of NGET's application. Instead, PINS will perform certain planning functions related to the DCO application on behalf of the Secretary of State.
- 2.8 The local or 'host' authorities, for which an NSIP application falls within their boundary, act as statutory consultees throughout the DCO process. Due to NGET's proposed routing options, Cambridgeshire County Council could be one of up to 8 potential host authorities involved in this NSIP project. The other potential host authorities are:
- Fenland District Council
 - Lincolnshire County Council
 - East Lindsey District Council
 - Boston Borough Council
 - South Holland District Council
 - Norfolk County Council
 - King's Lynn and West Norfolk Borough Council

Host authorities are expected to submit timely consultation responses throughout the NSIP process to inform the decision-making process providing local, specialist knowledge.

3. Main Issues: The Role of the Council During the NSIP Process

- 3.1 The Council will inform the NSIP process and the impact of NGET's proposals providing local, specialist knowledge.
- 3.2 The Council's officers will collaborate with specialists from the other host authorities to coordinate consultation responses. In doing so, the host authorities will best inform the NSIP process and provide input from a range of specialist technical areas. As the Minerals and Waste Planning Authority, the Local Highways Authority and the Lead Local Flood Authority, alongside our other statutory functions, the Council's officers will draft technical responses for sign off.
- 3.3 The legislation governing DCO applications does not distinguish between the different kinds of local planning authorities which may act as a host authority during the NSIP process. However, it is customary that if consent is granted by the Secretary of State, the planning requirements (similar to planning conditions) in the DCO will be discharged, monitored, and enforced by the council(s) that would typically be the determining authority. In this instance, responsibility for discharging the requirements, monitoring, and enforcement, would sit at the District Council level.
- 3.4 NGET is currently undertaking the necessary activities for the pre-application stage of the NSIP process. This includes engaging with the public to seek views on their emerging design, and to engage with host authorities receiving pre-application advice. The schemes are currently at the Statutory Consultation stage, which runs from 13th May 2025 to 23rd June 2025.
- 3.5 The Council's technical officers are reviewing the consultation documentation and will provide comments across a number of technical specialisms. These include, but are not limited to:
- Flooding, drainage and water resources
 - Ecology and biodiversity
 - Archaeology and historic environment
 - Minerals and waste
 - Communities
 - Climate and carbon
 - Emergency planning
 - Transport strategy
 - Public Rights of Way (PROW)
 - Highways
 - Public Health
- 3.6 Appendix 1 sets out the six stages of the NSIP process, and Appendix 2 provides clarification on the role local authorities play at each stage of the process, excluding decision. The guidance issued by PINS clearly states that local authorities and communities should be represented separately as consultees. Although local authorities should consider the thoughts and concerns raised by the local community, this does not necessarily mean they must adopt all the views put to them by residents. Local authorities are obligated to

conduct themselves in line with National Policy Statements and the relevant guidance from PINS.

- 3.7 See the [government guidance](#) published by the Planning Inspectorate for more information on the role local authorities play during the NSIP process: “The applicant should engage local authorities in the early stages of preparing their application and programme document. The local authority should participate in the applicant’s engagement activities, such as taking part in topic based working groups or technical briefings. The applicant should be aware however that this is not a statutory requirement for the local authority. The local authority should engage with the applicant even if they disagree with the project in principle. Early engagement with the applicant will not undermine any objections or submissions they may make during the next stages of the NSIP process.”
- 3.8 In preparation to meet strict deadlines as part of the NSIP process, the Planning Inspectorate advises host authorities to establish delegated authority to ensure timely responses and submissions.
- 3.9 This report is being presented to the Environment and Green Investment Committee during Statutory Consultation and ahead of the formal submission of NGET’s DCO application to enable officers to submit their responses within the deadlines set. In terms of the Statutory Consultation, as with all pre-application matters, it is the applicant that sets the deadlines (informed by timescales set by legislation and in PINS guidance). Once the application is submitted and accepted by PINS, all deadlines are set by PINS and the Examining Authority.
- 3.10 In the event that NGET progress the option which would make the Council a host authority, a paper setting out the proposed technical Relevant Representations will be brought back to this Committee, if deadlines allow, ahead of Examination.
- 3.11 Host authorities are encouraged to use the pre-application period to start their evaluation on the proposal. This evaluation, which is conducted by the County Council’s technical officers, is later documented in the Local Impact Report (LIR). The host authorities are encouraged to begin compiling the LIR as soon as the DCO application has been accepted by the Secretary of State. The LIR must be submitted to PINS within the timescales outlined by legislation which governs the NSIP process and to be set by the Examining Authority at Examination.
- 3.12 The host authorities will be required to assess the developer’s consultation and submit an Adequacy of Consultation response. The timescales in which officers are expected to assess the consultation and submit the relevant responses are constrained. For example, officers only have 14 days to submit a response to PINS confirming whether the developer’s consultation has met the requirements for the NSIP process and the County Council’s Statement of Community Involvement. This informs part of the process of PINS accepting the application once submitted.

4. The NSIP Process: Timescales

- 4.1 NGET is currently anticipated to submit their DCO application for the EGL 3&4 projects in 2026. Once the DCO application has been received by PINS, a decision will be made by the Department for Energy Security and Net Zero (DESNZ) on whether the application will

be accepted for examination. The Council will then be notified by PINS if the DCO application has been accepted for examination, as well as informed about the Examining Authority (Inspector(s)) appointed. If accepted, NGET's DCO application will proceed to examination, where the principal issues will be considered proportionately and reasonably by the Examining Authority. Examination is open to the public.

- 4.2 Following acceptance, the local authorities will be notified about the preliminary meeting to discuss procedural matters that are related to the examination. This preliminary meeting triggers the calculation of the timetable for examining the application under Section 98 of the Planning Act 2008 (see [government guidance](#) on the pre-examination stage for NSIPs). The timetable will include deadlines on when information needs to be submitted to the Planning Inspectorate. The examination can only run for up to 6 months.
- 4.3 Local authorities are encouraged to continue engaging with the developer during the pre-examination period as well as during examination, and both parties should continue their negotiations on any outstanding issues, disagreements, or points of clarification. Both parties may also need to continue negotiations during the pre-examination period for other reasons, for example, compulsory acquisition in the developer's plans which may affect the host authority's land holdings or interests. Resolving as many issues as possible in advance of the examination is recommended as it produces a more focused, expedient examination process for all participants.
- 4.4 During examination, if Cambridgeshire County Council is a host authority, officers will:
- Respond to the Examining Authority's (ExA) written questions.
 - Prepare and submit a Local Impact Report (LIR) to the Planning Inspectorate (PINS).
 - Prepare and submit to the Planning Inspectorate a Statement of Common Ground (SOCG) and Principal Areas of Disagreement Summary Statements (PADSS).
 - Prepare and submit a Written Representation to PINS.
 - Review and comment on the Applicant's submissions.
 - Represent the County Council and make spoken representations at issue specific hearings and, if necessary, the open floor hearings.

Please note: if NGET do not progress the underground cable routing option which passes through Cambridgeshire, we will not be a host authority for the proposals, and will therefore have a more limited input into the rest of the NSIP process for EGL 3&4.

5. Conclusion

- 5.1 It is essential that officers submit their responses to NGET's DCO proposals by the deadlines set out either in consultations, or at examination. Meeting these tight deadlines is crucial to avoid undue delays in the NSIP process, and to ensure the Council's representations can be given their full weight. PINS has the power to disregard late responses, which could reduce the Council's ability to scrutinise and influence the developer's DCO application during the examination. To mitigate this risk, officers are seeking delegated authority during the NSIP process including the pre-application stage. This recommendation is in line with [advice](#) from PINS, which states that the "local authority should set up clear delegations early in the pre-application stage of the process." And that they "should arrange agreed powers at Cabinet as early as possible during the pre-

application stage to enable officers to respond quickly and effectively.”

5.2 The following proposal is being brought to Committee to ensure that officers are following the advice issued by PINS, and open and transparent decision-making is upheld throughout the NSIPs process:

- Key documentation and updates will be provided to members of the Environment and Green Investment (E&GI) Committee and local County Councillors by email at the earliest opportunity to ensure that key submission dates are known to members in advance of the deadlines. Comments on the documentation should be provided as early as possible, especially in regard to the 14- and 28-day deadlines.
- Responses to PINS will either (i) be circulated to members of E&GI Committee and local County Councillors by email for their records, or (ii) when time permits, a draft will be taken to E&GI Committee for endorsement. When it is deemed necessary, officers will host member briefings or specific topic meetings to provide guidance on the NSIP process and the County Council’s technical responses.

5.3 If these recommendations are approved, officers will be able to respond quickly and effectively during the rest of the pre-application stage, and the examination stage of the NSIP process. It is important that officers have delegated powers, allowing them to submit timely responses during pre-application and examination when there is insufficient time to take the decision to committee.

6. Significant Implications

6.1 Finance Implications

The cost of processing NSIP applications comes from the existing revenue budget. The applicant is not charged a planning application fee by the County Council for NSIP proposals because DCO applications are managed by PINS. The County Council is negotiating a Planning Performance Agreement (PPA) with NGET to recover the costs of the pre-application stage activities and fund specialists to consult on matters which cannot be addressed by our own technical officers. Whilst these negotiations take place, NGET have issued the Council with a Letter of Intent, to enable cost recovery in the interim.

By entering into a PPA with NGET, the County Council seeks to mitigate the financial burden which the proposed development may have on the public purse. Despite the Council’s efforts to implement a comprehensive system for cost-recovery, a PPA with the developer does not guarantee the Council will be able to recover the full cost of the specialist resources which have been committed to assessing the DCO application. Officers are seeking a PPA to cover the pre-application stage, and examination stage in order to recover costs.

6.2 Legal Implications

There are no significant legal implications at this stage. Legal advice and representation including specialist advice on the application and DCO process, the legal elements of the Order, and any agreements will be utilised throughout the DCO process. Legal agreements

may also be entered into with the Applicant during this process. It is expected that appropriate legal support and advice will need to be scoped and secured to support the Council in the run up to, and specifically through the examination, if the Council is confirmed as a host authority going forwards.

6.3 Risk Implications

With recent planning reforms, we can expect the number of NSIP applications falling within the County boundary to increase. If multiple DCO applications are submitted within similar timescales, the Council's technical officers could be put under significant pressure if more than one DCO application is scheduled by PINS for examination at the same time. Limited capacity may result in a failure to proactively engage in the 'frontloaded' NSIP process, which may lead to reactive decision-making and poor outcomes for the County Council post-decision. If the Council is unable to submit adequate and timely responses during examination, we risk unsatisfactory outcomes for our residents, which may damage our reputation.

6.4 Equality and Diversity Implications

There are no significant equality and diversity implications that require officers to complete an EqIA. NGET will be obligated to submit an Equality Impact Assessment alongside their DCO application to PINS which the Council will review.

7. Source Documents

7.1 Reference to source documents.

Planning Inspectorate (PINS) National Significant Infrastructure Project (NSIP) Guidance and Advice Notes;

<https://www.gov.uk/government/collections/national-infrastructure-planning-advice-notes>

Planning Inspectorate (PINS) Nationally Significant Infrastructure Projects: Advice for Local Authorities;

<https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-for-local-authorities#Delegations>

NSIP Energy Policy Statement renewable energy infrastructure EN3;

<https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3>

Planning Act 2008 (as amended);

<http://www.legislation.gov.uk/ukpga/2008/29/contents>

National Grid Eastern Green Links 3&4 website;

[Eastern Green Link 3 and Eastern Green Link 4 | National Grid](#)

PINS Project Page for Eastern Green Links 3&4 NSIP Project;

[Eastern Green Link 3 and Eastern Green Link 4 - Project information](#)

The National Planning Policy Framework (NPPF) (2024)

<https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf>

