



**SCOTTISHPOWER
RENEWABLES**

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on National Grid Venture's Deadline 3 Submission

Applicant: East Anglia TWO and East Anglia ONE North Limited

Document Reference: ExA.AS-22.D4.V1

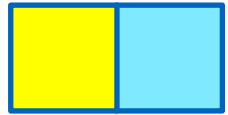
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Author: Royal HaskoningDHV

Applicable to East Anglia ONE North and East Anglia TWO



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Description of Revisions			
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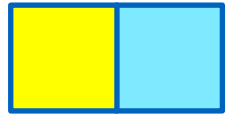


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Glossary of Acronyms

NGV	National Grid Ventures
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Glossary of Terminology

Applicants	East Anglia TWO Limited / East Anglia ONE North Limited
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order but will be National Grid owned assets.
National Grid overhead line realignment works	Works required to upgrade the existing electricity pylons and overhead lines (including cable sealing end compounds and cable sealing end (with circuit breaker) compound) to transport electricity from the National Grid substation to the national electricity grid.
National Grid overhead line realignment works area	The proposed area for National Grid overhead line realignment works.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO project / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.
National Grid substation location	The proposed location of the National Grid substation.
Onshore cable corridor	The corridor within which the onshore cable route will be located.
Onshore substation location	The proposed location of the onshore substation for the proposed East Anglia TWO project / East Anglia ONE North project.



1 Introduction

1. This document presents the Applicants' comments on National Grid Venture's Deadline 3 submission (REP3-112).
2. This document is applicable to both the East Anglia ONE North and East Anglia TWO applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23rd December 2019. Whilst for completeness of the record this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it again for the other project.



Table 1 Applicants' Comments on NGV's Deadline 3 Submission

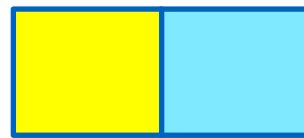
ID	Written Representation	Applicants' Comments
1	<p><u>Nautilus and EuroLink Multi-Purpose Interconnectors (MPIs)</u></p> <p>Nautilus is a proposed 1.4 gigawatts¹ (GW) high voltage direct current (HVDC) electricity link between GB and Belgium. EuroLink is a proposed 1.4 gigawatts (GW) high voltage direct current (HVDC) electricity link between GB and the Netherlands. In September 2020 NGV announced that both Nautilus and EuroLink Interconnector projects have been reclassified as multi-purpose interconnectors (MPIs); a new generation of interconnector that will connect multiple offshore wind farms via a singular transmission line, enabling the export of excess clean energy and reducing the impact of infrastructure on coastal communities. Both Nautilus and EuroLink are currently in feasibility stages of project development. Should the projects proceed, they could be operational pre-2030, subject to gaining development consent and final investment decisions for each project.</p>	<p>The Applicants note that the current stages of both projects are confirmed as being in 'feasibility stages of project development'.</p>
2	<p><u>Connection Agreements within the Leiston Area</u></p> <p>NGV has connection agreements with the NGESO (National Grid Electricity System Operator) within the Leiston area for both Nautilus and EuroLink. Each of these agreements provide a grid connection to a new 400 kilovolts (kV) substation located close to the Sizewell 400kV network, provisionally referred to as 'Leiston 400kV'. The connection agreements relate to an area rather than a specific location. The proposed NGET substation at Friston is the location proposed by SPR on the Sizewell 400kV network.</p>	<p>Noted.</p>
3	<p><u>Consideration of Connections to the Proposed NGET Substation at Friston</u></p> <p>NGV feasibility work to date has been based on an assumption that the proposed NGET substation at Friston (which forms part of SPR's proposals for East Anglia One North and East Anglia Two) is a potential connection point, given that the proposed Friston substation is at an advanced stage of consenting (via the DCO process). Therefore, initial routing and siting work has been based on the</p>	<p>The Applicants note that NGV do not have confirmed connections at Friston nor are Nautilus and EuroLink at a sufficiently progressed stage to confirm whether the proposed substation at Friston will present a viable connection location.</p>



ID	Written Representation	Applicants' Comments
	<p>reasonable assumption of a potential connection location at the proposed Friston substation. Further feasibility work will be undertaken in 2021, including due diligence on the options available for connection in the Leiston area in line with the connection agreements. While NGV have engaged in early discussions with stakeholders and maintained a dialogue with the ESO, at no point has this translated into a confirmed connection at Friston. As per NGV's draft Statement of Common Ground (SoCG) with the Applicant (document reference: ExA.SoCG-19.D1.V1) neither the Nautilus or EuroLink projects are at a sufficient stage of project definition to confirm whether the proposed NGET substation will present a viable connection location. However, NGV are concerned to ensure that the proposals for the EA2 and EA1N projects as it relates to the new NGET substation (and the surrounding area) do not unnecessarily limit or restrict the potential for the Nautilus and EuroLink projects to connect to the proposed NGET substation at Friston. However, NGV acknowledge that this is a matter for NGET.</p>	
4	<p><u>Consideration of Other Connection Options</u></p> <p>In the context of connection agreements referencing a new substation in the Leiston area (without a specific location) and in addition to the NGV feasibility studies assuming connection at the proposed NGET Friston substation (promoted by SPR), feasibility assessments for both Nautilus and EuroLink will also consider other potential connection options in the Leiston area. This assessment process will be undertaken in consultation with NGET, in response to the engineering requirements of both projects and will be required whether or not the proposed Friston NGET substation is consented. Given the timescales associated with developing a project, including development of cable routeing corridors and converter station siting options which would usually be based on a connection location, it is necessary for NGV to consider the fallback options for siting of a new substation. It is intended that this aspect of feasibility will be focused upon in 2021.</p>	Noted



ID	Written Representation	Applicants' Comments
	<p>Proximity to the Sizewell 400kV overhead line is a key consideration for informing potential connection options in the Leiston area.</p> <p>Other key considerations include sufficient space for construction and operation of a substation facility, including associated infrastructure, and potential environmental impacts.</p>	
5	<p><u>Nautilus Interconnector Briefing Pack and FAQs Documents</u></p> <p>In July 2019 we published a Briefing Pack for our proposed Nautilus Interconnector Project to assist in early engagement activities with stakeholders. In May 2020 we published an updated version of our Frequently Asked Questions document. Each of these publicly available documents set out that National Grid ESO have provided NGV with grid connection to a new 400 kilovolts (kV) substation located close to the Sizewell 400kV network, provisionally referred to as 'Leiston 400kV'. As SPR's proposals for the Friston substation were already advanced and in order to aid transparency with stakeholders and community groups, the Briefing Pack and FAQs both presented NGV's working position in reliance upon the potential connection to the proposed Friston substation. NGV shared some initial siting and routing options within the Briefing Pack (July 2019) on the basis of a connection to the proposed NGET substation at Friston. The project information in the Briefing Pack (July 2019) and FAQs (May 2020) is based on routing and siting options assuming a connection to the proposed Friston substation. The purpose of this approach was to allow NGV to progress feasibility stage engagement and assessments for a project assuming a possible connection to the proposed Friston substation (although the feasibility stage, as noted above, also allows for consideration of other potential connection options in the Leiston area). Since these documents were published, both Nautilus and EuroLink have been re-classified as MPis. The Briefing Pack and FAQs also make reference to EIA Scoping for Nautilus in 2021. As feasibility work is to continue into 2021, EIA Scoping is now anticipated for Nautilus in Q1 2022. Further public updates will be provided as our</p>	<p>The Applicants note the revised timing for the scoping of the Nautilus project to Q1 2022.</p>



ID	Written Representation	Applicants' Comments
	proposals develop and, in turn, by reference to the determination of the East Anglia One North and East Anglia Two Examinations	
6	<p><u>Current Position in Context of Cumulative Impact Assessment</u></p> <p>Feasibility studies for Nautilus and EuroLink are currently ongoing and we continue to define our project parameters following the decision to progress Nautilus and EuroLink as MPIs. For Nautilus, we are anticipating to undertake community consultation on potential site and cable options late summer 2021, followed by submission of an EIA Scoping request in Q1 2022. Detailed timescales are not yet available for EuroLink, although both Nautilus and EuroLink could be operational pre-2030. As per NGV's draft SoCG with the Applicant (document reference: ExA.SoCG-19.D1.V1) we are satisfied that at present neither Nautilus or EuroLink are sufficiently defined to allow for the reasonable assessment of cumulative impacts. There will not be sufficient information available to allow for this until our proposals reach EIA Scoping stage which is not anticipated until Q1 2022 for Nautilus; the first of the two projects to come forward. This approach is in accordance with Planning Inspectorate Advice Note 17 (2018). Any future application for development consent by NGV in this location would consider the cumulative impact of our proposals in the context of EA1N and EA2 and any other developments as appropriate. NGV continue to liaise and positively engage with SPR and will seek to reduce potential impact on the local area through sharing information on our proposals and coordinating approaches wherever possible.</p>	<p>The Applicants note the timing for the scoping of the Nautilus project and agree that neither the Nautilus or EuroLink projects are sufficiently defined to allow for the reasonable assessment of cumulative impacts, as per the Statement of Common Ground with NGV (REP1-062).</p>