



SPR EA1N and EA2 PROJECTS

DEADLINE 9 – COMMENTS ON CAH3 SUBMISSIONS

Interested Party: SASES PINS Refs: 20024106 & 20024110

Date: 15 April 2021 Issue: 1

INTRODUCTION

1. Following CAH3 the Applicants prepared a submission of oral case and responded to the Action Points issued by the Examining Authorities. SASES comments on that submission and responses as follows.

SUBMISSION OF ORAL CASE CAH3

Section 5.1 Reasonable Alternatives to Compulsory Acquisition and Temporary Possession

2. In Section 5.1 of the Applicants' Written Summary of Oral Case for CAH3, further consideration is given to alternative grid connection locations. SASES is concerned that the explanation appears to differ from that previously offered by the Applicants. It is noted that alternatives remain a principal issue of concern for the Examining Authorities, and SASES will make further submissions as appropriate as this issue is further examined.
3. In the interim SASES has submitted at Deadline 9 an Updated Pathfinder Clarification Note part of which relates to the submissions made by the Applicants at paragraphs 67, 68, 69 and 70.
4. Further in relation to paragraph 69 of the Submission of Oral Case the Applicants state that:

“the combined capacity of the Projects is 1700 MW”
5. As the Examining Authorities are aware the combined capacity is **up to** 1700 MW but that the Applicants are only committed to delivering projects with a combined capacity of 200 MW under the DCOs. Even if the statement in paragraph 68 that the maximum capacity for an HVDC link is 1320 MW (and see SASES' comments in the Updated Pathfinder Clarification Note) is taken at face value that represents only a 20% reduction from the maximum combined capacity of the Projects. In respect of EA1 the capacity of that project was reduced by over 40%.
6. In addition Scottish Power via the Applicants has brought forward EA1N and EA2 as separate projects of 800MW and 900MW respectively with no commitment to develop both Projects. Seeking to eliminate a proposal made by SASES based on the maximum capacity of the projects is questionable in circumstances where the Applicants will not commit in the DCOs to a capacity approaching the maximum capacity of the Projects when there is a history of “downsizing” the capacity of offshore windfarm projects.
7. In paragraphs 72 – 76 the Applicants seek to dismiss sites at Old Leiston Airfield and at Harrow Lane, Theberton. However there appear to be no adverse comments on the Harrow Lane site which is well enclosed, as distinct to the old airfield site which is open (but distant from properties apart from the Cakes & Ale camping site).

8. The reference in paragraph 73 to there being a 'key difference' between the Projects and NGV projects needs further explanation by the Applicants. The NGV projects require just two HVDC cables per project from landfall to the converter station location, and then six 400kV cables from there to the National Grid substation at Friston. The Applicants have six 275kV cables per project to route from landfall to their substations at Friston. Accordingly using HVAC is more expensive because of the need for more cables and trenches.

Section 2.2 Hundred River Crossing

9. The Applicants state that (as detailed in the Deadline 7 Project Update Note [REP7-042](#)) the maximum working width of the onshore cable route at the Hundred River crossing has been reduced to 34m width for a distance of 40m from the banks of the Hundred River. This and the Applicants' oral explanations at CAH3 have been misleading. It has not been made clear that should both projects go ahead the working width would be $2 \times 34 = 68\text{m}$. The Project Update Note and this Summary of Oral Case are confusing in this respect in that they refer to both EA1N and EA2 in their titles. The same comment applies to EA1N & EA2 Project Update Note [REP3-052](#) para 2.2 on page 6.
10. Draft DCO Requirement 12 and paras 23 and 75 of Statement of Reasons [REP7-012](#) for **each** project refer to 34 metres width being required per project.
11. Evidence that the actual maximum width would be 68m is confirmed in the Applicants' Outline Watercourse Crossing Method Statement Version 03 [REP8-084](#) Section 4.8 : Onshore Cable Route Width. This document is explicit at para 64:

*“Since submission of the Application, the Applicant has reduced the working width of the onshore cable route where the cables cross the Hundred River from 50m to 34m **per project**. This working width applies for 40m from the Hundred River's western bank and eastern bank (the Hundred River Crossing buffer)”.*

12. It is stated again at para 65:

“The width of the onshore cable route within the Hundred River crossing buffer will be up to 34m wide for a single project or 68m where the onshore cables/ducts for East Anglia TWO and East Anglia ONE North are installed in parallel.”

13. Two 48 x 40m buffer areas, one each side of the river are also illustrated in the Map at Figure 2 of Outline Watercourse Crossing Method Statement V3.
14. The Applicant has variously mentioned the purpose of such a wide separation as being to make sufficient room for construction vehicle turning and to facilitate cooling of cables during the Operation phase. It is not clear why such a large spacing of the cable ducts would be required only at the watercourse. A width of 68m is 250% wider than the maximum width commitment of 27.1m for the cable route at the Aldeburgh Road pinch point, just a few metres away and far exceeds what would be needed for vehicle turning purpose.

15. Clearance of such a large area of this, a Natural England designated 'Priority Habitat Protected Habitat Inventory Deciduous Woodland' alongside the River Hundred would be unacceptably damaging to both habitat and landscape.

Responses to ExA Hearings Action Points (CAHs3)

16. In response to Action 3 : The need for 70m Cable Corridor (Section 1.7, page 22 of Applicants' Response to Compulsory Acquisition Hearing 3 [REP8-093](#)) the Applicants stated at CAH3 Session 1 (time stamp: 1:28:14 of Video Recording) that "*there had not been any objections on the 70m of any substance*". We would point out that SASES and other Interested Parties have raised concerns about the matter of the excessive width of land take for construction of the cable corridors and the lack of clarity in the Applicants' submissions on how that land would be allocated should one or both the projects be constructed. Those concerns were raised both in Written Representations and at Open Floor Hearings (Examples: [REP1-371](#) para 4.4 and [REP2-161](#) para 1).

17. The Applicants' explanations at CAH3 regarding their intention to acquire rights over excessive areas of land along a 70m width of the Cable Corridors were confusing.

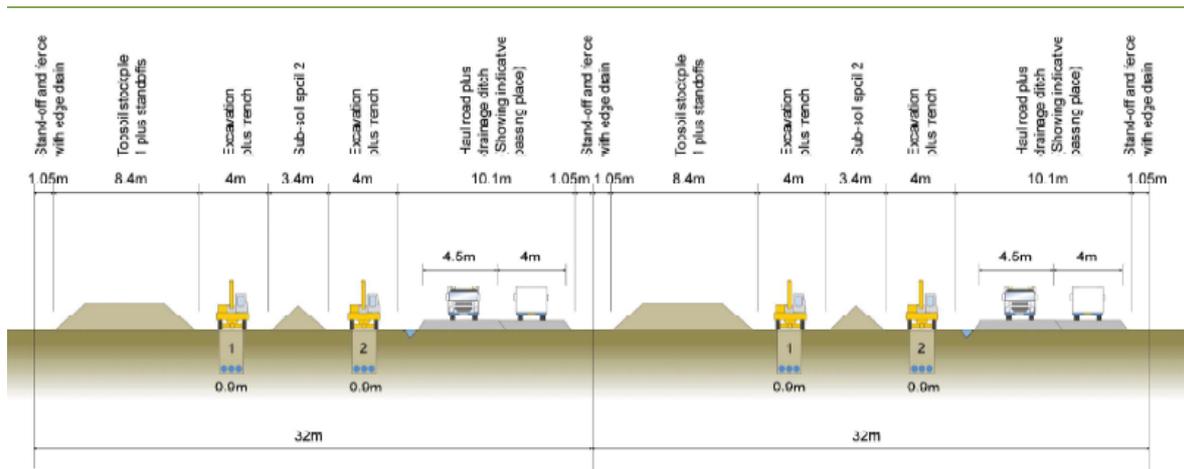
18. In their response to Action Point 3, the Applicants claim that a single consented 70m wide order limit shared by both projects is justified through a potential benefit to agricultural landowners should only one project be consented. The Applicants argue in section 2.2 that in that scenario there would be flexibility ensuring that the single cable corridor can be constructed adjacent to the field boundary, thereby avoiding the need for a landowner to leave sterile during construction phases a 35 metre wide strip of land between cable corridor and field edge.

19. However, on examination of EA1N/EA2 Land Plans Rev 04, in conjunction with Suffolk Definitive Maps and Statement of public rights of way and views from Google Earth, only circa 770m of those sections of the 9.2Km cable corridor whose width is less than 75 are adjacent or even close to field boundaries. That immaterial potential saving of short 35m wide strips (at plots 13,15 and 85) cannot justify an excessive land take of 35 metres width over the remainder of the length of the cable corridors.

<https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/Aldringham-cum-Thorpe.pdf>

<https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/Friston.pdf>

20. The Applicants did not describe or illustrate at CAH3 their Indicative Cable trenching arrangement and working area to include two separate haul roads in the event that 'Scenario 1' prevails i.e. EA1N and EA2 constructed concurrently. This default arrangement was illustrated by SPR on Display Boards at its final and formal Phase 4 / Section 42 public consultation : Slide 2 of Appendix 9.10 of 5.1.9 Phase 4 Public Exhibition Boards [[APP-038](#)] as illustrated below and attached.



East Anglia TWO and East Anglia ONE North Indicative cable trenching arrangement and working area

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2 East Anglia TWO and ONE North Onshore Development

The offshore export cables will make landfall north of Thorpeness, at a location which has been selected following consultation with statutory stakeholders and technical experts.

Horizontal Directional Drilling (HDD) will be undertaken to facilitate the offshore export cables coming onshore and to avoid interaction with the cliffs, beach and intertidal area.

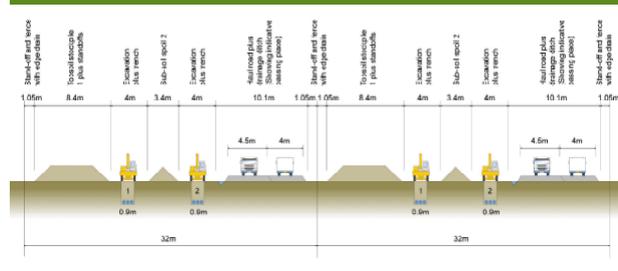
From landfall, underground cables would be installed to the substations at Grove Wood, a distance of approximately 9km.

The width of the onshore cable route would typically be 32m per project during construction, reducing to 16.1m at important hedgerows and the woodland at Aldeburgh Road.

Where trenchless techniques are used (i.e. at the landfall), the width would be wider.

An onshore substation would be required for each project, both connecting to a single National Grid substation at Grove Wood. All substations will be located adjacent to each other to maximise the use of existing screening and improve the effectiveness of new landscaping, which will reduce the visual impact of the substations.

The existing overhead lines will require modification to facilitate the grid connection, which could include up to one additional pylon and require strengthening works to the existing pylons in the immediate area. New cable sealing end compounds will also be required to connect the overhead lines to the National Grid substation.



East Anglia TWO and East Anglia ONE North Indicative cable trenching arrangement and working area