

Planning Inspectorate
By Email

6th May 2021

Dear Rynd Smith,

I write ahead of deadline 10 to respond to the comments made by the applicants to my deadline 8 submission.

Technology

Scottish Power Renewables claim that:

“The current schemes could not be built utilising a single HVDC connection. This is due to technology and transmission entry constraints.”

It's clear from the submissions that SEAS have previously made that they do not agree with this statement. Indeed, the applicant's own East Anglia Three project is due to be 1.4 GW and HVDC. The HVDC technology is clearly available to Scottish Power Renewables.

'Pathfinder' Project

SASES' has outlined an alternative, possible "Pathfinder" project, using HVDC technology to connect EA1N and EA2 windfarms by a coordinated 1.7 GW HVDC Bipole link from an offshore platform to Bramford NGET substation, via a single cable trench from Bawdsey landfall to Bramford NGET substation. This is outlined in their Updated SASES Pathfinder Clarification Note at deadline 9. This alternative could use the existing cable corridor to include cables for both EA1N and EA2 to an existing National Grid substation site, at which the applicant already owns land. This option would cause substantially less environmental damage and economic damage to local communities.

Bradwell

Scottish Power Renewables state that:

"It would have required a very significant overhead transmission reinforcement and would not have been deliverable within the timescales. It would not pass the legal requirements for an OFTO scheme of being an economic and efficient connection."

The long-term capacity of Bradwell as an integrated Wind Energy Hub has significantly greater potential than the Friston site. It is closer to London and on the coast thus negating the need for cable corridors to be dug and re-dug with every future wind farm project attempting to connect to the Grid. It is a brownfield site and in need of development. Whilst the overhead pylon lines will need upgrading and reinforcing at some cost, there will in turn be cost savings from using fewer trenches and cables. Furthermore the cost benefits from integration have been documented in NGEN's Offshore Coordination Phase 1 Final Report which says that:

"Adopting an integrated approach for all offshore projects to be delivered from 2025 has the potential to save consumers approximately £6 billion, or 18 per cent, in capital and operating expenditure between now and 2050."

Integration and the BEIS Review

The Applicants' response to requests for them to engage in the BEIS Review and the emerging government policy of integration is:

"The enduring transmission scheme is likely to take until 2030 to deliver. This is beyond the project timelines".

This may be the case for the 'enduring regime' where multiple HVDC projects from different developers are integrated offshore. But this is not all that the BEIS Review is about. The BEIS Review is phased. Stakeholders have been requested by BEIS to come forward with proposals for 'Pathfinder' projects capable of early implementation. In the case of EA1N and EA2, these two projects can share the same technology, share the same developer (which quite possibly would negate the need for changes to legislation) and therefore have opportunities to integrate within the existing regime and to engage with the BEIS Review as a 'Pathfinder' project or similar. As outlined in SASES response:

"SPR is well placed to integrate these projects and reduce the harm to the environment. This does not require a ring main or shared assets but runs with the government's energy policy. It enables an alternative grid location to be brought forward with less damaging impacts on our environment and coastal communities in line with the White Paper and BEIS Review."

Offshore Wind Targets

The applicant justifies the urgency of these projects by referencing the government's intensification of the need for the delivery of large volumes of offshore wind capacity. However, these renewable energy targets cannot be isolated from the government's policy on protecting our natural environment as outlined in the government's 10-point plan and indeed in the energy White Paper, which says:

"We will safeguard our cherished landscapes, restore habitats for wildlife in order to combat biodiversity loss and adapt to climate change, all whilst creating green jobs."

SEAS' deadline 8 comments on the Changing Policy Environment sum this up that:

"The pressing need for renewable energy does not justify the failure to consider the government's environmental policy. This consistent directive is now echoed within the Executive, the Legislative and the Judicial arms of government. The onshore aspects of these projects, as they currently stand, fly in the face of the Prime Minister's 10 Point Plan, the Prime Minister's response to Duncan Baker, the BEIS Review, the Government Energy White Paper, the Dasgupta Review and nearly every report written on Network Transmission in the last 10 years. It is now irrational to say that the policy environment is not one of greater offshore coordination to protect our environment."

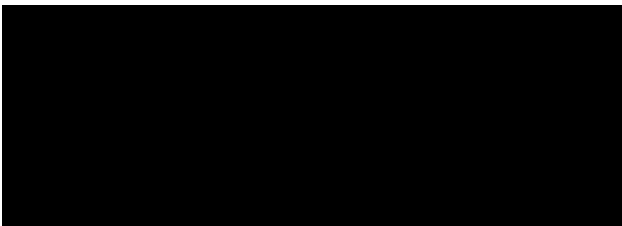
The Split Decision

The applicant states that:

"Awarding the Projects consent on the basis of a split decision would achieve nothing. Such a project could not bid into a CfD Auction and the engagement of supply chain would stop. Without confidence about delivery, suppliers would cease to engage."

As per SEAS' deadline 5 submission, a split decision would, of course, necessitate another DCO to be put forward for the onshore aspect of these works before bidding in CfD. Although given the extension of the examinations, these projects might come too late for the next round of CfD to be opened later this year in any event. If, as has previously been the case, another CfD is not held for another two years, a split decision would give the applicant time to submit a proposal in line with the governments emerging environmental and wind energy policy by ensuring that the onshore infrastructure minimises its environmental and community damage.

Yours sincerely,



Rt Hon Dr Therese Coffey MP
Suffolk Coastal



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RENEWABLES**

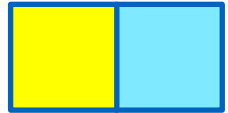
East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants Comments on Therese Coffey's Deadline 8 Submissions

Applicant: East Anglia TWO and East Anglia ONE North Limited
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Applicable to East Anglia ONE North and East Anglia TWO



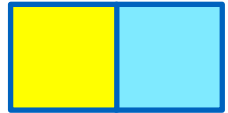
Revision Summary				
Rev	Date	Prepared by	Checked by	Approved by
001	15/04/2021	ScottishPower Renewables	Ian Mackay	Rich Morris

Description of Revisions			
Rev	Page	Section	Description
001	n/a	n/a	Final for Deadline 9 Submission



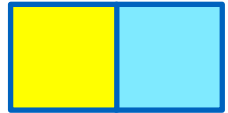
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Glossary of Acronyms

CfD	Contracts for Difference
CION	Connection and Infrastructure Options Note
DCO	Development Consent Order
HVDC	High Voltage Direct Current
kW	Kilowatt
NGESO	National Grid Electricity System Operator
PD	Procedural Decision
SEAS	Suffolk Energy Action Solutions
SoS	Secretary of State



Glossary of Terminology

Applicant	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 ONE North windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
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.
East Anglia TWO windfarm site	The offshore area within which wind turbines and offshore platforms will be located.



1 Introduction

1. This document presents the Applicants Comments on Thérèse Coffey's Deadline 8 submissions (REP8-249).
2. This document is applicable to both the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) 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 (PD-004). Whilst this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it for the other project submission.



2 Applicants Comments on Thérèse Coffey Deadline 8 Submissions

ID	Dr Coffey Comment	Applicants' Comments
Prime Ministers Questions – 24th February 2021		
1	<p>Duncan Baker – North Norfolk MP</p> <p>If the UK is to become the Saudi Arabia of wind power, off my coast of North Norfolk is surely the capital. But the current piecemeal and environmentally damaging connection method to the national grid is holding us back, as was proven by the Vattenfall judicial review just last week. We need legal and regulatory reform now. Prime Minister, could this be a job for the new Taskforce on Innovation, Growth and Regulatory Reform to help us to implement the much-needed offshore transmission network and meet our net zero targets? (912356)</p> <p>The Prime Minister</p> <p>Yes indeed. I congratulate my hon. Friend on his campaign to make his constituency the Riyadh, or possibly the Jeddah, of offshore wind. I can tell him that we are certainly looking at the issue of the transmission network review and we are developing the necessary regulatory changes.</p>	<p>The Applicants note this</p>
Transcript of Therese Coffey's Policy Submission		



ID	Dr Coffey Comment	Applicants’ Comments
2	<p>I am also, of course, aware of the emerging policy, which is that the Prime Minister made a commitment to update the Conservative Party Manifesto so that we have 40GW of offshore wind electricity by 2030, rather than 30GW.</p>	<p>The Applicants note the comments</p>
3	<p>The issue though, throughout all of this, has always been with the proposed onshore infrastructure – and the more energy projects proposed for the east coast – the more important it is that there’s an integrated approach.</p> <p>To recap, in March 2019, nearly two years ago now, the government published its “Industrial Strategy: Offshore Sector Wind Deal” document which committed to addressing “strategic deployment issues including onshore and offshore transmission and cumulative environmental impacts. That becomes increasingly relevant, I think, especially in light of the ruling yesterday by Justice Holgate.</p> <p>In Summer last year, the Energy Minister, now the Secretary of State, announced the Offshore Transmission Network Review into how energy firms bring their electricity back onshore to the National Grid. That review has a focus on “identifying tactical near-term actions that can be taken and early opportunities for coordination for projects in the short- to medium-term” as well as a “longer-term strategic review to develop a new regime that can ensure a more coordinated approach for the future”.</p> <p>The National Grid contribution to the review underlined that “an integrated approach could reduce the number of onshore landing points by about half and it suggested that “the majority of the technology required for integrated design is available now.”</p>	<p>National Grid Electricity System Operator (NGESO) have indicated that the wider concept of integrated offshore HVDC links is dependent on technology which has yet to be established. The reference to an Eastern Link is not a project that the Applicants are involved in. This is a transmission project which seeks to improve interconnection of the GB electricity transmission network. This is not relevant to an offshore generation connection.</p>



ID	Dr Coffey Comment	Applicants’ Comments
	<p>I think that is something that the applicants seems to agree with considering their commitment to a Scotland to England super-highway, known as the Eastern Link, bringing offshore energy on shore in an integrated way with other developers with cables being routed up to 440km far more than what is being proposed today or alternative sites which could be considered. Construction could start in 2024 and is expected to be complete by 2030. So time does not seem to be a barrier there.</p>	
4	<p>People in this area are already familiar of the concept of using HVDC cables for multiple wind farms and having just one route and connection point direct to Bramford as that is precisely is what is supposed to have happened on these wind farms. The Examining Authority may wish to note that SPR had previously received consent for such a proposal initially landing through Bawdsey but SPR later changed their connections to AC and has effectively led to the proposals for onshore infrastructure being considered here today.</p>	<p>The Applicants have explained the background to the East Anglia ONE project (REP3-085). It was successful in a CfD auction for a lesser capacity than what was consented and has been built out with the most efficient grid connection option relative to the successful capacity. The current schemes could not be built utilising a single HVDC connection. This is due to technology and transmission entry constraints. In addition, there is currently a cap on project size for Contracts for Difference (CfD) auctions.</p>
5	<p>During the adjournment debate in Parliament on the 5th November, Kwasi Kwarteng said that “the argument for some form of offshore network review had been won.” – again referring to a system of integrated and coordinated connections. I shared this with the examining authority and it’s been published in Hansard.</p> <p>And then in December, just a couple of months ago, the government published the Energy White Paper. A document designed to clearly set out a new policy framework, which commits to an integrated approach rather than single point-to-point connections.</p>	<p>The Applicants have set out their position on the white paper in the Written Submission of Oral Cases for Issue Specific Hearing 4 on 19th and 20th January 2021: Onshore Environment, Construction, Transport and Operational Effects (REP5-028) and Written Submission of Oral Cases for Issue Specific Hearing 9 on 19th February 2021: the draft Development Consent Orders (REP6-054) The enduring transmission scheme is likely to take until 2030 to deliver. This is beyond the project timelines.</p> <p>A potential location at Bradwell was evaluated in the Connection and Infrastructure Options Note (CION) process. It would have required a very significant overhead transmission reinforcement and would not have been deliverable within the timescales. It would not pass the legal requirements for an</p>



ID	Dr Coffey Comment	Applicants’ Comments
	<p>The White Paper even specifically mentions the east coast of England and the need for a more “strategic approach” Suggesting the use of ‘hybrid, multi-purpose interconnectors, which are already being explored by developers in the UK and other countries, to get the most from our offshore wind and transmission assets.”</p> <p>And it is in light of this changing policy landscape, I really think SPR need to look again at how they bring their energy from EA1 & 2 onshore. I have been consistent in suggesting the brownfield site at Bradwell in Essex is a much better option for the onshore infrastructure desired– which has a greater potential capacity than the substations proposed for Friston.</p>	<p>OFTO scheme of being an economic and efficient connection. The Applicants refer to the Written Summary of Oral Case for Issue Specific Hearing 2 on 2nd and 3rd December 2020: Onshore Siting, Design and Construction (REP3-085)</p>
6	<p>In fact, I think there is now such a clear direction on this from government that I would be inclined to back the proposal from SEAS in suggesting a split decision. Approving the offshore works as not to unduly delay the project but with a clear signal that instead of the current spaghetti-like cabling that we could end up within East Suffolk, holding off on an onshore decision until a coordinated proposal is put forward that complies with emerging government policy. There is already a precedent for this, in which I am thinking of the Triton Knoll wind farm when National Grid re-considered the connection location.</p>	<p>Awarding the Projects consent on the basis of a split decision would achieve nothing. Such a project could not bid into a CfD Auction and the engagement of supply chain would stop. Without confidence about delivery, suppliers would cease to engage. There are no alternative technology solutions which are likely to come forward in the short to medium term.</p>
7	<p>I would suggest this is increasingly noteworthy for the Examining Authority particularly in regard to the rulings by Justice Holgate on Pearce vs the SoS and Pearce vs Vattenfall which were published yesterday and to which you referred at the start of today’s hearing. I too have not yet been able to absorb the full details of the rulings but the principle set out by Justice Holgate seems clear that</p>	<p>The Applicants have commented on Justice Holgate’s judgment in a number of submissions including at section 2.5 of the Applicants’ Comments on SASES Deadline 6 Submissions (REP7-059).</p> <p>The Applicants have submitted an assessment of the cumulative impacts and agree that this information should be taken into account by the Secretary of State in reaching a decision on the Applications.</p>



ID	Dr Coffey Comment	Applicants' Comments
	<p>government should regard the cumulative impact on the local environment in the assessment for each application.</p>	
8	<p>We know that National Grid has already given connection commitments to other developers in this area which lend themselves to further onshore infrastructure being required in this area. I think some of that information has been been released publicly like the Nautilus interconnector while notice to another developer was released inadvertently but nevertheless, those offers have been made – and I should point out that it is my understanding that National Grid is legally obliged to do so, even if no pre-planning consultation has started.</p> <p>The examining authority, I'm sure, will be aware that the cumulative impact is potentially huge for this part of the country. And it has long been my view as Member of Parliament for Suffolk Coastal that the full likely impact needs to be assessed now in a coordinated, cumulative approach when considering this application.</p>	<p>The Applicants have set out the legal framework in respect of grid connections in The Regulatory Context Note (REP2 -003). NGENSO have provided information to the examination regarding the contracted grid positions. In addition, the Five Estuaries and North Falls projects have updated the examination with their respective positions (AS-100 and REP7-066, respectively).</p>
9	<p>Now, in light of the rulings, it is my intention to make further representations on this point to this application and also to the Secretary of State. I do not know if he will appeal against these rulings but I will make the case that this ruling gives him the opportunity to accelerate the full adoption of his emerging policy.</p>	<p>The basis for the decision in Pearce v Secretary of State (SoS) was that the SoS should have considered environmental information that was before him but failed to do so. As noted above the likely significant environmental effects (including cumulative effects) have been assessed and reported on. We do not consider that the ruling in Pearce either requires or promotes any change in law or policy.</p>