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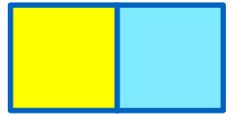
East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on the Anglian Energy Planning Alliance's Deadline 9 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
01	06/05/2021	Paolo Pizzolla	Lesley Jamieson / Ian MacKay	Rich Morris

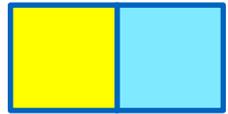
Description of Revisions

Rev	Page	Section	Description
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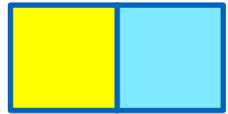
Table of Contents

1	Introduction	1
2	Applicants' Comments on Anglian Energy Planning Alliance's Deadline 9 Submissions (REP9-052)	2



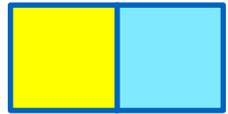
Glossary of Acronyms

AONB	Area of Outstanding Natural Beauty
CIA	Cumulative Impact Assessment
EIA	Environmental Impact Assessment
ES	Environmental Statement
ExA	Examining Authority
NGV	National Grid Ventures
NPS	National Policy Statement
SPR	ScottishPower Renewables



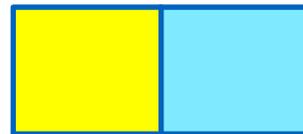
Glossary of Terminology

Applicant	East Anglia ONE North Limited / East Anglia TWO 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.
East Anglia ONE North / East Anglia TWO windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
Horizontal directional drilling (HDD)	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
HDD temporary working area	Temporary compounds which will contain laydown, storage and work areas for HDD drilling works.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.



1 Introduction

1. This document presents the Applicants' comments on the Anglian Energy Planning Alliance's Deadline 9 submission (REP9-052).
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.



2 Applicants' Comments on Anglian Energy Planning Alliance's Deadline 9 Submissions (REP9-052)

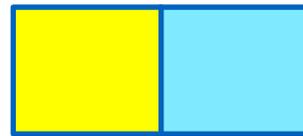
Point	Anglian Energy Planning Alliance's Comment	Applicants' Response
1. Cumulative impact assessments remain insufficient		
1	<p>The still critical issue of cumulative impact was highlighted in the ExA's Rule 8 (3) letter of 1 April. It remains our view that to comply with the requirements of NPS EN-1 and the EIA Directive, and to enable the Secretary of State to carry out his obligations in relation to environmental assessment, the Applicant is obliged to supply substantial further information.</p> <p>This information must comprise comprehensive details of all energy projects that will be developed, or are reasonably expected to be developed, if consented, at or near Friston. The Applicant's contention that insufficient information is available is not tenable, for the following reasons among others:</p>	<p>The Applicants maintain their position that the projects in question are not adequately defined to facilitate a cumulative impact assessment (CIA), in line with The Planning Inspectorate Advice Note 17: Cumulative effects assessment relevant to Nationally Significant Infrastructure Projects.</p> <p>CIA requires an understanding of different projects' potential impacts and how their zones of influence may interact. Detailed knowledge on location and potential impacts is crucial to this and is not available for the projects in question.</p>
2	<p>In March this year National Grid Ventures (NGV) gave a presentation to affected Town and Parish Councils about its interconnector projects Nautilus and Eurolink. The visual presentation omitted any reference to landfall, cable routing or siting of the converter stations, but more detailed information was supplied in response to questions. A transcript of the questions asked and answers given has been requested, but has not been supplied. (The ExA may itself care to request it.) Nevertheless detailed notes were taken by Councillors attending the webinar, and the following points were noted:</p> <ul style="list-style-type: none"> • NGV were offered and accepted a connection at Friston for both projects. This offer was made by NGV's related company National Grid. 	<p>The Applicants would note that the National Grid Ventures (NGV) projects are not yet defined in terms of siting or routing options. As stated by NGV (section 2.1 of the Statement of Common Ground with National Grid Ventures (REP8-113)), the connection point for these projects will be in the Leiston area but the exact location remains unconfirmed; Friston has not specifically been identified. This is supported by the fact that the 2019 map referred to by Anglian Energy Planning Alliance shows seven potential converter station sites. Additionally, the Applicants would point to NGV's Deadline 9 submission (REP9-062) which states that EIA scoping for these projects is not expected until the first quarter of 2022. The Applicants maintain their position that the NGV projects are not adequately defined to</p>



Point	Anglian Energy Planning Alliance's Comment	Applicants' Response
	<ul style="list-style-type: none"> • NGV will use the NG substation included in the EA1N and EA2 DCOs if consented, but the interconnector projects will also each require their own extremely large converter station. • NGV's map for these interconnector projects, given to community groups in 2019 and entitled Initial Site Appraisal, remains valid. It shows four potential landfall sites between Thorpeness and Sizewell, 2 new cable routes to be excavated through the AONB and beyond, each culminating at or near Friston, and seven potential greenfield sites (also all at or near Friston) for construction of the new converter stations. 	<p>facilitate a CIA, in line with The Planning Inspectorate Advice Note 17: Cumulative effects assessment relevant to nationally significant infrastructure projects. CIA requires an understanding of different projects' potential impacts and how their zones of influence may interact; detailed knowledge on location and potential impact is crucial to this.</p>
3	<p>The promoters of North Falls - formerly Greater Gabbard extension - stated at their meeting with the Planning Inspectorate in November 2020 that they aim to sign a connection agreement with NG in 2021, and that cable route/landfall/substation selection would begin in October 2020. This project is expected to connect at or near Friston.</p>	<p>The Applicants would refer to the submission made by North Falls (REP7-066) confirming that this project will not connect to the grid near Leiston.</p>
4	<p>In its Network Options Assessment document of February 2020 National Grid indicated that it will seek to use the Friston site for its SCD1 & SCD2 interconnector projects.</p>	<p>This statement is incorrect. The potential SCD1 and SCD2 projects have not yet determined a connection point and indeed have yet to proceed as active projects.</p>
5	<p>Friston residents were told at a presentation by the Applicant during earlier consultation that its aim is to make Friston one of the largest power hubs in Europe. This is confirmed by the East Suffolk Council minutes stating that "the National Grid substation proposed with the SPR applications is being seen by National Grid as a strategic connection point for future projects". This minute also recorded the Council's concern that such a strategic connection aim was "without the potential impacts being cumulatively assessed, and without any of this future development being considered within the existing master plan for the site".</p>	<p>The Applicants state categorically that this quote is not taken from any of the presentations or written materials that they have provided on the Projects.</p> <p>As noted in its post hearing submission at Deadline 3 (REP3-110), National Grid Electricity System Operator confirms that "<i>It is not proposed to develop a strategic connection hub at Leiston</i>".</p>



Point	Anglian Energy Planning Alliance's Comment	Applicants' Response
	(It is for this reason that such a large number of East Suffolk residents feel betrayed by ESC's recent decision, made without local consultation, to give tacit support to the Applicant's proposals.)	
6	In view of all the above, it must be possible for the Applicant and its partner National Grid to provide the ExA with the environmental impact assessments necessary to comply with their obligations, and to make a detailed assessment of their cumulative effects. Without this information, no recommendation for consent can be expected to be accepted by the Secretary of State or upheld at judicial review.	See Applicants' response at ID1.
2. Further Information required on alternative connection site		
7	The promoters of the Five Estuaries project (ex Galloper extension,) which was among those many projects expected to connect at or near Friston, have announced that they have accepted a revised connection offer from National Grid at a new unspecified location within the East Anglia Coastal area.	The Applicants consider that there is no requirement for further consideration of alternative onshore substation site options given the well-established nature of the current site and the progressed stage of the Examination process.
8	This raises the question of whether this new location is a suitable alternative site for connection of EA1N and EA2. The ExA will no doubt wish to receive information on this point from both the Applicant and National Grid.	<p>The Applicants have followed NPS EN-1, NPS EN-3, NPS EN-5, the Electricity Act 1989 and National Grid's Guidelines on Substation Siting and Design (Horlock Rules). A thorough site selection and consideration of alternatives has been undertaken and this is presented in Chapter 4 of the Environmental Statement (ES) (APP-052).</p> <p>Regarding alternatives, Regulation 14(2)(d) of the Infrastructure Planning (EIA) Regulations 2017 requires an ES to provide a description of the reasonable alternatives studied by the applicant. It goes on to suggest that these require to be relevant to the proposed development and its specific characteristics. In that context, the Applicants have fully set out their approach to site selection. The process is transparent and there was</p>



Point	Anglian Energy Planning Alliance's Comment	Applicants' Response
		<p>extensive engagement throughout, both with consultees and members of the public. This is reflected in the various consultation rounds undertaken by the Applicants.</p> <p>The Five Estuaries and North Falls projects are significantly further behind the Projects in terms of the consenting process and connection dates and therefore the considerations relating to their connections will be different.</p> <p>In terms of alternatives that are relevant to the proposed development, in the Applicants' submission this is restricted to considering those options which were available for the specific developments which were proposed and which reflected the regulatory requirements of the Electricity Act and the Connection and Infrastructure Options Note process. Chapter 4 Site Selection and Assessment of Alternatives of the ES (APP-052) and the Consultation Report (APP-029) illustrate the extent of the environmental factors taken into account.</p>