



**SCOTTISHPOWER
RENEWABLES**

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Responses to Hearings Action Points

Applicants: East Anglia TWO Limited and East Anglia ONE North Limited

Document Reference: ExA.HA.D1.V1

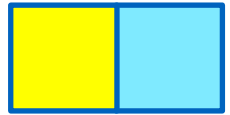
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Applicable to East Anglia ONE North and East Anglia TWO



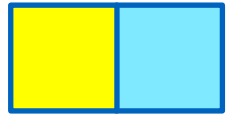
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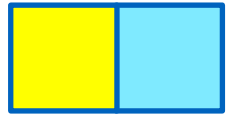
Glossary of Acronyms

AADT	Annual Average Daily Traffic
CfD	Contract for Difference
DCO	Development Consent Order
ExA	Examining Authority
OFHs	Open Floor Hearings
SASES	Substation Action Save East Suffolk
SCC	Suffolk County Council
SPR	ScottishPower Renewables



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.



1 Applicants' Responses to Hearings Action Points

1.1 Introduction

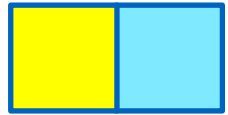
1. This document has been prepared to address actions arising from the Open Floor Hearings (OFHs) held virtually on Wednesday 7th October, Thursday 8th October and Friday 9th October 2020 as detailed in Open Floor Hearings 1, 2 and 3: Hearings Action Points issued by the ExA on 19 October 2020 (EV-016). Responses to actions addressed to the Applicants are provided in **sections 1.2 to 1.7** below.
2. This document is applicable to both the East Anglia ONE North and East Anglia TWO 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 (ExA) 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.

1.2 OFHs1 Action 1: East Anglia ONE Transmission Capacity

3. This section responds to the matters raised by Substation Action Save East Suffolk (SASES) in relation to the transmission infrastructure for the East Anglia ONE project and their statement that there has been a reduction in capacity from 7.2GW to 2GW.

1.2.1 The Former East Anglia Zone

4. The former East Anglia Zone (the former Zone) was identified with capacity for up to 7.2GW, the reference to 7.2GW therefore relates to the former Zone (comprising multiple projects) and not the East Anglia ONE project alone.
5. The former Zone was originally identified by The Crown Estate as part of the Round 3 Offshore Wind Zone tendering process in 2008. In 2010, East Anglia Offshore Wind Limited (EAOW, a joint venture between ScottishPower Renewables (SPR) and Vattenfall) was successful in securing what was later to be called the "East Anglia Zone", and committed to developing 7.2GW of offshore wind renewable energy.
6. After successfully obtaining consent and a Contract for Difference (CfD) for East Anglia ONE, and successfully submitting the application for consent for East Anglia THREE (consented in 2017), SPR and Vattenfall split the former Zone. SPR agreed to develop the southern half of the former Zone and Vattenfall



agreed to develop the northern half of the former Zone. SPR is developing East Anglia ONE, East Anglia THREE and the East Anglia TWO and East Anglia ONE North projects, with a combined capacity of approximately 3.8GW. Vattenfall is developing the Norfolk Vanguard and the proposed Norfolk Boreas projects with a combined capacity of up to 3.6GW which would connect to the National Grid at Necton in Norfolk.

1.2.2 East Anglia ONE

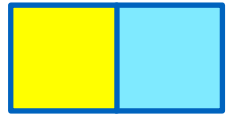
7. In 2014, development consent was granted for East Anglia ONE, with a capacity of up to 1200MW. The East Anglia ONE project participated in the first Allocation Round of the CfD scheme in 2015 and was awarded a contract for 714MW of capacity. Given the reduction in size of the project, SPR determined that the project would need to connect to the National Grid transmission system through HVAC technology rather than HVDC apparatus. SPR therefore requested a non-material change to consent the HVAC transmission system which was not permitted under the original DCO. The revised capacity of the East Anglia ONE project was 750MW to allow for transmission losses. This non-material change was granted in 2016.
8. East Anglia ONE is now operational, at a capacity of 714MW and connected to the UK electricity grid.

1.2.3 East Anglia THREE

9. The East Anglia THREE project was initially consented for 1.2GW in 2017, subsequently increased to 1.4GW following a non-material change in 2019. The proposed connected capacity of East Anglia ONE and East Anglia THREE at Bramford is therefore 2.14GW, assuming East Anglia THREE is built out to its full capacity.
10. To conclude, 7.2GW relates to the intended capacity of the former Zone. The proposed capacity of East Anglia ONE and East Anglia THREE (which connect into Bramford) is 2.14GW. There has therefore not been a reduction from 7.2GW to 2GW in respect of East Anglia ONE (or indeed in respect of East Anglia ONE and East Anglia THREE if that was what was meant by the statement).

1.3 OFHs2 Action 1: Potential for Shared Cable Infrastructure

11. Several speakers at OFHs2 made reference to East Anglia ONE Limited installing ducts for East Anglia THREE resulting in a reduced construction impact overall. This section confirms the approach that was taken and addresses the extent to which it would be possible to take the same approach for these applications, should they be constructed sequentially.
12. East Anglia ONE connects to the National Grid at Bramford, via a 37km cable route from landfall at Bawdsey. East Anglia THREE shares this cable route and



- its cables will be installed in ducts which were pre-installed as associated development for East Anglia ONE. This was a requirement in the East Anglia ONE DCO.
13. For the construction of East Anglia THREE, there is a requirement to return to the cable route to pull cables through the pre-installed ducts. The East Anglia THREE DCO does not allow for any ducting to be installed. This will require site clearance and preparation (including setting up of construction consolidation sites along the route), installation of a haul road to access jointing bays (from which cables will be pulled and jointed), cable pulling and jointing and reinstatement and landscaping. For the avoidance of doubt, no works for the East Anglia THREE converter station were included in the East Anglia ONE DCO.
 14. This approach to construction could potentially be utilised for the Projects, however, the determining factor for whether this construction scenario could be adopted for the Projects will be the outcome of the CfD auction, scheduled to be held in 2021 and every two years thereafter. Whilst the precise level of Government funding for each round of future CfD auctions is yet to be announced, it is clear that the Government is continuing to drive the offshore wind sector to reduce costs.
 15. Recent CfD auctions have seen significant reductions in the cost of offshore wind projects. In 2015, CfD Round 1 (in which East Anglia ONE successfully secured its CfD), achieved an average clearing price of approximately £117/MWh. In 2017, CfD Round 2 achieved prices as low as £58/MWh. The offshore wind CfD prices for CfD Round 3 in 2019 were lower still at around £40/MWh.
 16. All indications are that this downward pressure will continue into the 2021 CfD auction, when the Projects are expected to enter the Round 4 CfD auction. This reduction in CfD strike price represents a significant challenge for the offshore wind sector to reduce construction costs, and is likely to result in only the most competitive projects receiving CfD support and therefore proceeding to construction.
 17. Acknowledging the extremely competitive market, in order to ensure the capital cost of both Projects are as competitive as possible, each project must bear its own construction cost. Should only East Anglia TWO be successful in the 2021 CfD auction for example, that project may not be able to carry the significant cost of the duct installation for the East Anglia ONE North project as it would increase the East Anglia TWO construction costs, making the East Anglia TWO project less competitive and potentially jeopardising its ability to secure a CfD in its own right (and vice versa if only East Anglia ONE North was successful in the 2021 auction). In that case, both Projects would progress sequentially (construction



scenario 2), with the project that was not successful in the 2021 auction proceeding to construction at a later date once it secures a CfD.

18. However, the Applicants are currently investigating the possibility of installing ducts for both Projects in parallel should the Projects be built sequentially. An update will be provided at Deadline 2.

1.4 OFHs2 Action 2: Multiple Project Connections at Friston: Extent of Compulsory Acquisition

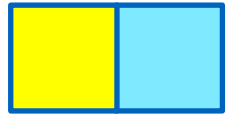
19. The Applicants can confirm that the Compulsory Acquisition powers sought in respect of the onshore substations and National Grid infrastructure at Friston are necessary for the Projects only and in the event that land is found not to be required for the Projects, compulsory acquisition powers will not be exercised in respect of that land.

1.5 OFHs3 Action 1: A1094 Air Quality Evidence

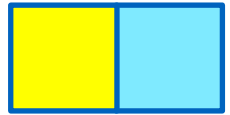
20. The Applicants can confirm they will respond to evidence submitted by Georgina King regarding air quality impacts on the A1094 at Deadline 2.

1.6 OFHs3 Action 3: Sizewell Highway Effects

21. The Applicants have undertaken a comprehensive traffic and transport assessment, set out in **Chapter 26 Traffic and Transport** (APP-074) in consultation with Suffolk County Council (SCC) and Highways England (the highway authorities).
22. Sizewell Gap has been included within the onshore highway study area and is identified as Link 12 in **Figure 26.1 - Onshore Highway Study Area** (APP-306). Sizewell Gap is identified as a local access route by SCC in their Lorry Route Network and is also designated as a route for heavy loads (Heavy Route 100) by Highways England (**Appendix 26.6 - Suffolk - Lorry Route Network (extract) and Highways** (APP-532)).
23. **Table 26.23** of Chapter 26 Traffic and Transport **Traffic and Transport Impact Assessment (Chapter 26)** (APP-074) identifies that cumulative total traffic flows at Link 12 would be expected to increase by up to 12% (from 2,844 (Annual Average Daily Traffic (AADT)) and HGV flows by 176% (from 87 AADT). Link 12 was not identified during consultation with SCC as being potentially sensitive to changes in traffic and therefore (for this magnitude of change) no significant impacts are anticipated.
24. The Applicants are producing a clarification note which assesses the cumulative impact with the proposed New Sizewell C Nuclear Power Station, utilising the data published in the Sizewell C DCO application (submitted after submission of the Project's DCO application) and will submit this document to the Examination



- at Deadline 2. This will consider the latest Sizewell C traffic figures which will include that associated with Sizewell C's construction of the Sizewell Link Road (referred to in the Actions as the Sizewell Relief Road).
25. The Applicants are progressing Statements of Common Ground with EDF Energy Nuclear Generation Limited (owner and operator of Sizewell B), Magnox Limited (holder of the nuclear site licence for Sizewell A), the Nuclear Decommissioning Authority (owner of Sizewell A), the Office for Nuclear Regulation, and Suffolk County Council (the local highway authority), where any such party has the opportunity to raise matters relating to Sizewell Gap or nuclear safety for discussion with the Applicants.
26. The Applicants will develop emergency planning measures to respond to an emergency at the Sizewell B Nuclear Power Station and the proposed Sizewell C New Nuclear Power Station (once operational), during the construction and operational period of the Projects. To achieve the above, the Applicants will liaise directly with the Suffolk Joint Emergency Planning Unit to provide necessary information to satisfy the Suffolk Joint Emergency Planning Unit's emergency planning requirements in relation to the Sizewell Off Site Emergency Plan.
27. The Applicants acknowledge the importance of the Sizewell Off Site Emergency Plan and will continue to liaise with the Suffolk Joint Emergency Planning Unit to explore the mechanics for ensuring that the Sizewell Off Site Emergency Plan remains up to date in light of the construction, operation or decommissioning of the Projects.
28. The Applicants have also submitted an **Outline Construction Traffic Management Plan** (APP-586) as part of the Applications, the final version of which requires approval from the relevant planning authority in consultation with the relevant highway authority prior to the commencement of onshore works (secured under Requirement 28 of the **draft DCO** (APP-023)). The final Construction Traffic Management Plan will set out the standards and procedures for managing the impact of HGV traffic during the construction period, including details of localised road improvements and traffic management necessary to facilitate the safe use of the existing road network.
29. In addition, the Applicants will submit an updated **draft DCO** (APP-023) at Deadline 3 which will commit the Applicants to the submission of a Sizewell Gap Construction Method Statement as part of Requirement 22 (Code of Construction Practice). As set out in the **Outline Sizewell Gap Construction Method Statement** (document reference ExA.AS-21.D1.V1) submitted to the Examination at Deadline 1, this document will present details of the works to be undertaken at Sizewell Gap and will require the approval of the relevant planning authority prior to such works commencing. This will further protect the integrity



of Sizewell Gap and ensure safe use of Sizewell Gap throughout the Projects' construction, operation and decommissioning phases.

30. Regarding Sizewell Hall Road, as outlined within the **Temporary Stopping up of PRow Plan** (APP-013) a temporary diversion will be in place to accommodate users of Public Right of Way E-106/025/0.

1.7 OFHs3 Action 4: Regulatory Context Note

31. The Applicants can confirm they will submit a regulatory context note to the Examination at Deadline 2 setting out the legal and regulatory framework following the receipt of Deadline 1 submissions from Interested Parties and to inform Issue Specific Hearing 2.