

## **East Anglia THREE Offshore Wind Farm Project**

### **Draft Environmental Statement Chapter 5: Description of the Development and Draft Environmental Statement Chapter 6: EIA Methodology**

#### **Planning Inspectorate Review Comments**

1. The information contained within this note is in response to a request from East Anglia Offshore Wind (EAOW) (the applicant) on 6 August 2015 for the Planning Inspectorate (the Inspectorate) to provide an informal review of Chapter 5 (Description of the Development) and Chapter 6 (EIA Methodology) of the draft Environmental Statement (ES) for the proposed East Anglia THREE (EA3) offshore wind farm project.
2. The Inspectorate welcomes the opportunity to comment on draft documents as this enables us to provide advice about any omissions or potential procedural risks for the acceptance or examination stages. This advice forms parts of our pre-application service, details of which are available in the Inspectorate's pre-application prospectus which outlines the structured and facilitative approach to support that the Inspectorate can offer during the pre-application stage.
3. The Inspectorate's comments on the applicant's draft ES chapters are set out below. The comments provided are without prejudice to any decisions taken by the Secretary of State during acceptance or by the Examining Authority (ExA) during examination, if the application for the proposed development is accepted for examination.
4. These comments are not a detailed review of the draft ES chapters provided but are intended to provide helpful observations. In the absence of the full ES it is possible that comments made by the Inspectorate may be addressed by information contained within other ES chapters and/or supporting information. The Inspectorate has also not yet had the opportunity to compare the information contained in ES Chapter 5 with a version of the draft Development Consent Order (DCO). The Inspectorate draws to the attention of the applicant the importance of ensuring consistency between the descriptions of works/activities in the ES and the description of the development to be permitted through the draft DCO.

#### **General Comments**

5. The Inspectorate notes that not all acronyms used in ES Chapters are provided in full at the point of first occurrence (for example, HVAC, MSL, MHWS, ROV, GBS, UXO, PSV, TWG). For clarity and ease of reading, the Inspectorate recommends that acronyms be explained in the ES Chapter

or a glossary to the ES be provided. As a general point, the ES should be checked for typographical errors prior to issue and ensure that specific cross-references to paragraphs, tables and diagrams in the chapters are correct. It is noted, for example, that there are a number of words missing from the text in Table 5.2 of ES Chapter 5.

6. The 'References' section at the end of the chapters do not appear to include all the documents referenced in the text. All documents relied upon for the purposes of the environmental impact assessment (EIA) should be fully referenced and easily accessible if not provided.

### **Comments on Chapter 5 Description of the Development**

7. The Inspectorate notes that Table 5.1 does not in every case state the maximum (or 'up to') limit of the parameters. For example, there is a potential conflict between the use of the terms 'up to approximately 8km' for the offshore cable corridor and 'nominal 75m wide corridor' for the onshore cable. The applicant may wish to clarify the maximum design envelope in this table.
8. Table 5.1 (Project Description Terminology) includes interconnection cables in the description of the East Anglia THREE project as a whole; however, they are not further described in the remainder of the table. The information in the table also suggests there would be only one substation at Bramford; however, subsequent text in the chapter indicates that a maximum of two electrical substations would be located in one substation compound. The applicant may wish to clarify this point in the table.
9. Table 5.2 (Consultation Responses) does not in every case include a cross-reference in the final column of the table to where the comment made by the consultee has been addressed in the ES. The Inspectorate recommends that specific reference to the ES and paragraphs in the ES Chapters are included in the table, where relevant and appropriate.
10. The Inspectorate notes that paragraph 14 refers to 'two further projects' that are planned to connect to the substation at Bramford. It would be helpful to state the names of these projects and what these projects comprise.
11. The Inspectorate recommends that cross-reference is included to identify where the 2012 geophysical surveys data is presented in the DCO application documents. This also applies to other reports referenced in the chapter, such as the drivability assessment at paragraph 105.
12. It is noted that in a number of places the Chapter refers to 'estimated', 'likely' or 'indicative' maximums/worse-case. The ES needs to make clear what has been assessed as the worse-case for each topic chapter. Clarity

and consistency should be ensured between ES Chapter 5 and the development to be permitted through the draft DCO. For example, the Inspectorates notes from paragraph 25 that the parameters stated for the turbine hub height and rotor swept diameter are only estimates or 'likely to be'. The applicant should ensure that the ES clearly assess the worse-case with regards to the permissible wind turbine parameters. The parameters should be clearly set out in the draft DCO and the ES must also correspond to the proposed works to be delivered through the draft DCO.

13. The text in Table 5.20 explaining the 'platform links' is confusing. Perhaps this would be clearer if it read '(cable to link collector stations to convertor stations)'.
14. The Inspectorate notes that paragraph 150 states that '*the minimum requirements in each option could amount to significantly less infrastructure, as illustrated in Diagram 5.13*'. Diagram 5.13 presents the Single Phase High Voltage Direct Current (HVDC) option; however, it may be possible to identify the minimal infrastructure required for the Single Phase Low Frequency Alternating Current (LFAC).
15. At paragraph 151 it would be helpful to clearly indicate which bullet points apply to each electrical infrastructure option (i.e. the HVDC option or LFAC option).
16. The Inspectorate notes that Table 5.21 includes for '2 cables (HVDC or LFAC) in 4 trenches', however, we assume this should be in 2 trenches.
17. Section 5.5.15 describes the construction activities and sequences and states that '*Many of the processes would be the same for the Two Phased construction programme however the timings may differ.*' The Inspectorate believes this section would benefit from further clarification where there are differences between the two phasing options. For example, it is not clear whether the statement at paragraph 239, concerning the duration of the foundation installation taking up to 12 months over a two year period, applies to both the single phase or two-phase approach.
18. Table 5.30 (Indicative Vessel Requirements at Construction and Operation Stages) refers to '*Regular operation option 1*' and '*Regular operation option 2*'. These options are not explained in the text. The Inspectorate recommends that an explanation of these options be provided in the chapter.
19. Table 5.31 (Indicative Number of Vessel Movements required for Single Phase and Two Phased Approaches) indicates that no transport barges would be required for the installation of offshore converter and collector

platforms under the single phase approach, but would be required for that activity under the two phase approach. It is not entirely clear from the ES why these two approaches differ. The applicant should clarify this point if it is incorrect.

20. The Inspectorate notes that Section 5.5.17 is titled 'Offshore Maintenance'; however, the applicant may wish to amend this to Operational offshore maintenance (or similar), to more clearly reflect its content.
21. The applicant may wish to consider reiterating the number of transition bays proposed (as summarised in paragraph 19) in Section 5.6.2.1 of the ES, where transition bays are described in more detail.
22. The Inspectorate notes that the ES Chapter includes limited reference to working hours for elements of the onshore construction works. The applicant should consider stating likely working hours in the ES for all elements of the onshore construction works; particularly if working hours are to be specified in the draft DCO.
23. It is noted that Section 5.6.2.3 (Decommissioning), which is included in onshore Section 5.6, refers to decommissioning of the offshore cables. The applicant may wish to review whether this text is relevant to this section.
24. The Inspectorate recommends that Section 5.6.7.2.2 (Installation of haul road) also include text to identify the worse-case scenario that is being assessed in the ES in terms of the haul roads (as previously stated in Table 5.2 and paragraph 431).
25. It is explained in paragraph 393 that where site tracks cross existing watercourses it will be necessary to install temporary watercourse crossings to maintain flows. The Inspectorate recommends these crossings are shown on a plan, and potential effects on watercourses as a result of the crossings be assessed in the topic chapters, as appropriate.
26. The Inspectorate notes a discrepancy in Table 5.43 (Jointing bay parameters) between the total volumes of the top soil and native soil to be excavated and the total volumes of soil to be disposed of offsite. It is unclear how the volume of soil to be disposed of offsite has been calculated. The applicant may wish to clarify this in the table.
27. The Inspectorate notes that both the onshore and offshore works have the potential to generate waste spoil, which may require disposal to an offsite location. It would appear from responses to Natural England's comments in Table 5.2 that the excess offshore arisings would be addressed in a Marine Licence. The applicant should ensure that sufficient information is

provided within the ES to describe the likely significant effects on the environment.

### **Comments on Chapter 6 EIA Methodology**

28. The Inspectorate notes the applicant's statement at paragraph 2 that states '*the general methodology used is in accordance with*' the Planning Act 2008 and the EIA Regulations. The legislation does not specify the methodology but rather the DCO application and ES need to comply with these. The applicant may wish to consider re-phrasing this sentence.
29. Section 6.3.2 confirms that the Inspectorate was part of the Evidence Plan (EP) steering group. The applicant may wish to clarify in this section that the Inspectorate had a facilitative role. The Inspectorate did not act as arbitrator or decision maker on any issues arising from or discussed at the meetings.
30. Paragraph 9 refers to the '*final design stage*' but it is not clear from this chapter what this stage is and when it would occur. It may be that information on the final design stage is explained in other chapters to the ES; however, the applicant may wish to add a clarifying statement on this point.
31. The Inspectorate notes that paragraph 29, which summarises potential projects/activities considered in relation to cumulative impacts, only refers to offshore and marine examples of projects/activities. Section 6.8 (Cumulative Impact Assessment) subsequently acknowledges that onshore projects will also be considered. The applicant may wish to clarify at paragraph 29 that onshore projects will also be considered, if that is indeed the case.
32. In relation to assigning values to a receptor, the Inspectorate notes that Table 6.2 includes as an example of the definition of 'Low' value, receptors that are '*rare but with high potential for mitigation*'. The Inspectorate is unclear how the applicant would consider such value, as it is usual to take into account the anticipated effects of mitigation on potential impacts when assigning value to a receptor. The applicant may wish to clarify what this meant by this statement.
33. The Inspectorate welcomes the inclusion of the confidence assessment at Section 6.7.3.2. It is noted that the proposed confidence assessment would be provided to state confidence in the data used. The applicant may also wish to consider including a confidence level with regard to the likelihood of change/activity occurring and the degree of confidence in the assessment of the impact, such as that promoted by the Chartered Institute of Ecology and Environmental Management (CIEEM) in their Guidelines for Ecological Impact Assessment (2006). It is noted that the

applicant proposes to include an '*opinion on the confidence in the accuracy of the assessment*' for cumulative effects (paragraph 66). This should also be considered for the impact assessment.

34. The Inspectorate notes that 'Stage 5' of the cumulative impact assessment screening and assessment approach (as presented in Section 6.8.3) identifies a potential need to revisit a particular assessment. The Inspectorate welcomes the inclusion of an opportunity to revisit the assessment, as the Inspectorate noted that Stage 3 stated that the list of cumulative projects was agreed for HRA Screening or Preliminary Environmental Information (PEI) stage. As the Inspectorate understands that the HRA Screening and PEI were carried out in May 2014, there could be the potential for the project to have changed since the production of this information. The applicant should ensure that cumulative projects and plans have been screened and assessed against the project as proposed in any DCO application. Related to the above, the applicant should clarify if 'consultation responses' as stated in Stage 5 would be the responses to the HRA Screening and PEI report.

**4 September 2015**