



SCOTTISHPOWER
RENEWABLES

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on The Wildlife Trusts' 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

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01	15/04/2021	Paolo Pizzolla	Lesley Jamieson / Ian MacKay	Rich Morris

Description of Revisions

Rev	Page	Section	Description
01	n/a	n/a	Final for submission

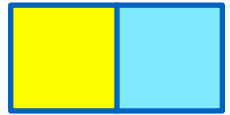
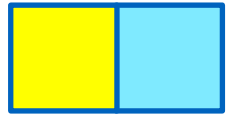


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Glossary of Acronyms

APP	Application Document
CFWG	Commercial Fisheries Working Group
DCO	Development Consent Order
DML	Deemed Marine Licence
EIA	Environmental Impact Assessment
ES	Environmental Statement
HRA	Habitats Regulation Assessment
IPMP	In-Principle Monitoring Plan
LAT	Lowest Astronomical Tide
MCA	Maritime and Coastguard Agency
MMMP	Marine Mammal Mitigation Protocol
MMO	Marine Management Organisation
OOOMP	Outline Operations and Maintenance Plan
RR	Relevant Representation
SAC	Special Area of Conservation
SIP	Site Integrity Plan
SLVIA	Seascape, Landscape and Visual Impact Assessment
SNS	Southern North Sea
UXO	Unexploded Ordnance

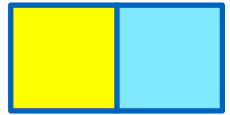


Glossary of Terminology

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.
European site	Sites designated for nature conservation under the Habitats Directive and Birds Directive, as defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017 and regulation 18 of the Conservation of Offshore Marine Habitats and Species Regulations 2017. These include candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas.
Generation Deemed Marine Licence (DML)	The deemed marine licence in respect of the generation assets set out within Schedule 13 of the draft DCO.
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.
Inter-array cables	Offshore cables which link the wind turbines to each other and the offshore electrical platforms, these cables will include fibre optic cables.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
Meteorological mast	An offshore structure which contains meteorological instruments used for wind data acquisition.
Marking buoys	Buoys to delineate spatial features / restrictions within the offshore development area.
Monitoring buoys	Buoys to monitor <i>in situ</i> condition within the windfarm, for example wave and metocean conditions.
Offshore cable corridor	This is the area which will contain the offshore export cables between offshore electrical platforms and landfall.
Offshore development area	The East Anglia ONE North / East Anglia TWO windfarm site and offshore cable corridor (up to Mean High Water Springs).
Offshore electrical infrastructure	The transmission assets required to export generated electricity to shore. This includes inter-array cables from the wind turbines to the offshore electrical platforms, offshore electrical platforms, platform link cables and export cables from the offshore electrical platforms to the landfall.



Offshore electrical platform	A fixed structure located within the windfarm area, containing electrical equipment to aggregate the power from the wind turbines and convert it into a more suitable form for export to shore.
Offshore export cables	The cables which would bring electricity from the offshore electrical platforms to the landfall. These cables will include fibre optic cables.
Offshore infrastructure	All of the offshore infrastructure including wind turbines, platforms, and cables.
Offshore platform	A collective term for the construction, operation and maintenance platform and the offshore electrical platforms.
Platform link cable	Electrical cable which links one or more offshore platforms. These cables will include fibre optic cables.
Safety zones	A marine area declared for the purposes of safety around a renewable energy installation or works / construction area under the Energy Act 2004.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations as a result of the flow of water.
Transmission DML	The deemed marine licence in respect of the transmission assets set out within Schedule 14 of the draft DCO.



1 Introduction

1. 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 (ExA) 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. This document presents the Applicants' comments on The Wildlife Trusts' (TWT) Deadline 8 submission (REP8-183).



Point	TWT Comment	Applicants' Response
Appendix A – TWT Comments on the Updated Offshore In Principle Monitoring Plan		
001	<p>Sandeel monitoring plan</p> <p>While this is not within our immediate field of interest and it has not yet been discussed in sufficient detail, TWT welcome the pre- and post-construction sandeel monitoring plan that the Applicant has committed to undertake, particularly given the uncertainty around the large size of the turbine foundations when compared to the foundations used for the Round 2 offshore windfarms. We would be keen to hear the results of this study if the Applicant is willing to share as this habitat has wider implications for prey availability in the North Sea, such as harbour porpoise.</p>	<p>The Applicants will provide the results of the sandeel monitoring plan to TWT once the monitoring report has been submitted to the MMO and is in the public domain.</p>
002	<p>Joint monitoring programme</p> <p>We welcome the commitment by the Applicant to work with other East Anglia projects to deliver a joint monitoring programme and we would be keen to hear the results of this study.</p>	<p>The Applicants will provide the final marine mammal monitoring reports to the TWT once the monitoring reports have been submitted to the MMO and are in the public domain.</p>
003	<p>Harbour porpoise and noise monitoring</p> <p>TWT welcome the commitment to monitor harbour porpoise using passive acoustic monitoring (PAM) and we would be interested to hear about the results of ongoing harbour porpoise monitoring in the area.</p> <p>However, we are still largely dissatisfied that monitoring of underwater noise levels will only occur during the construction of the first four piles. There is a missed opportunity to coordinate the harbour porpoise monitoring programme mentioned above with further underwater noise monitoring in order to have a complete and accurate picture of the impacts of the construction programme.</p>	<p>Monitoring of the first four piles at least one of which will be in an area anticipated to generate the greatest noise emissions at both Projects is agreed with the MMO and Natural England. The Applicants consider that this combined with PAM monitoring (the exact form of which will be agreed post consent) will provide an accurate picture of the potential impacts on harbour porpoise in the vicinity of the Projects during construction and builds on the monitoring undertaken at East Anglia ONE.</p>



Point	TWT Comment	Applicants' Response
Annex B – TWT Comments on the Updated Draft Marine Mammal Mitigation Protocol and Updated In Principle Site Integrity Plan for the Southern North Sea Special Area of Conservation		
004	<p>Removal of project alone impacts</p> <p>TWT welcome the amendment of the commitments within both documents to remove project alone impacts. As stated orally at ISH3 and in our Deadline 3 and 4 responses, TWT had concerns surrounding the Applicant's decision to include project alone impacts (regarding the scheduling of UXO clearance and piling) in the MMMP and SIP as this meant that the project alone impacts on site integrity of the Southern North Sea Special Area of Conservation (SAC) will be dependent on commitments to mitigation and full assessments of mitigation effectiveness that would not occur until post consent.</p>	The Applicants welcome this position.
005	<p>Therefore, TWT welcome that these commitments have been removed from the Draft MMMP and In- Principle SIP and are now secured under Condition 27 of the Generation DML and Condition 23 of the Transmission DML to <i>“prevent concurrent piling, concurrent UXO detonations or a combination of the two, and restricts the number of noisy events to one within a 24 hour period during the SNS SAC winter period”</i> as well as the statement that <i>“there would also be no concurrent piling or UXO clearance between the proposed East Anglia TWO and East Anglia ONE North projects.”</i></p>	The Applicants welcome the TWT position and note that the updated draft DCO submitted at Deadline 8 has these same conditions however the condition numbers are now 28 and 24 for the Generation and Transmission DMLs respectively.
006	<p>We would like to stress that careful coordination is needed in order to ensure that these activities do not exceed the noise thresholds of the Southern North Sea SAC.</p> <p>As stated in a previous response, TWT suggest to the regulators/SNCBs that it may be useful to provide guidance as to the</p>	The Applicants note that this is the responsibility of the MMO who have set up a southern North Sea regulators Group to manage this. The Applicants have no further comment.



Point	TWT Comment	Applicants' Response
	<p>definition of the phrase 'any given day' in the current methodology for assessing noise impacts and whether this intended to refer to a calendar day (midnight-midnight) or any 24 hour period¹.</p> <p>It would be useful to clarify this to ensure consistency between future projects or scheduling of noisy activities.</p>	
007	<p>Submission timescales</p> <p>TWT also welcome the Applicant's commitment to produce a final detailed SIP for UXO clearance at least six months prior to UXO clearance activities being undertaken.</p>	The Applicants welcome this position.
008	<p>Impacts on the Southern North Sea SAC</p> <p>We appreciate that Defra, the MMO and the Southern North Sea Regulators Working Group are taking positive steps to develop effective management for in-combination underwater noise impacts and TWT will continue to work closely with all stakeholders on this. However as stated in previous responses, as a regulatory mechanism for managing the in-combination impacts from multiple SIPs is not yet in place and is unlikely to be in place before the end of this examination, we cannot agree with the in-combination assessment conclusions of no adverse effect on the Southern North Sea SAC.</p>	See Point 006.

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/889842/SACN_oiseGuidanceJune2020.pdf