



**SCOTTISHPOWER  
RENEWABLES**

# **East Anglia ONE North and East Anglia TWO Offshore Windfarms**

## **Applicants' Comments on Suffolk Energy Action Solutions' Deadline 10 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**

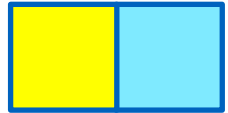


#### Revision Summary

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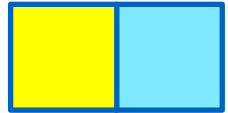
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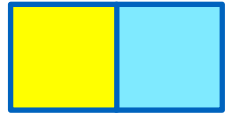
## Glossary of Acronyms

CIA	Cumulative Impact Assessment
DCO	Development Consent Order
ExA	Examining Authority
PD	Procedural Decision
SEAS	Suffolk Energy Action Solutions



## 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 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 Introduction

1. This document presents the Applicants' comments on Suffolk Energy Action Solutions' (SEAS) Deadline 10 submission (REP10-059).
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 (ExA) procedural decisions on document management of 23<sup>rd</sup> 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 Comments on SEAS' Deadline 10 Submissions

### 2.1 Applicants' Comments on SEAS' Deadline 10 Submissions (REP10-059)

ID	SEAS' Comment	Applicants' Comments
<b>Extension</b>		
1	As noted in our Deadline 9 submission (REP9-089), SEAS herewith reaffirm their objection to the three-month extension of the examination of EA1N and EA2 on the grounds that it gives an unfair advantage to the Applicant, ScottishPower Renewables. We would have wholeheartedly agreed to an extended next stage after the close of the Examinations in April for the ExA to scrutinise the evidence and arguments presented during the six-month Examination period, and believe the ExA would have come to the conclusion that SPR had been negligent in their application, refusing to supply the required information and evidence to enable the ExA to make an informed recommendation to the SoS. We assert that this Extension puts an unacceptable strain on community groups' resources.	Regarding the reasons for the extension, the Applicants would refer to the ExA's formal request to the Secretary of State (PD-037).
2	SEAS is disappointed not to have received any formal response from the ExA to its detailed objection to the Extension.	This is a matter for the ExA.
<b>Surveys</b>		
3	The Examinations were due to close on 6 April 2021, and within days SPR commenced onshore and nearshore surveying works that should have been completed prior to application to ascertain whether this fragile coast and protected terrain is viable for such an onslaught of energy infrastructure. In the last three weeks, Residents have been extremely upset that little notification has	The Applicants confirm that such onshore site investigation works are typically undertaken post consent . However, the Applicants have scheduled these site investigation works to be undertaken at the present time in order to maintain the Projects' development programme and allow for the rapid deployment of



ID	SEAS' Comment	Applicants' Comments
	<p>been posted about these works and that contractors have little knowledge of the local terrain; situ of aquifers, how to protect nearby horses, disruption of bridle and footpaths, protection of nesting birds and badgers, thereby further distressing the community who have to deal with and rectify their mistakes. This does not bode well and is no doubt an indication of what's to come. One resident has asked SPR if the site survey results will be made available and has had a negative reply.</p>	<p>offshore wind capacity in line with the Government's strategy should the Projects receive consent.</p> <p>The Applicant refer to <b>Applicants' Statement regarding Ground Investigation Works Update</b> (REP10-029) submitted at Deadline 10 which further details the scope of works of these investigations and associated control measures implemented to minimise disturbance and adhere to best practice. Detail is also provided on the engagement undertaken to date as well as future engagement proposals with organisations and the community.</p>
4	<p>SEAS notes that in RULE 17 of 29 April (R17AC-2) that the ExA have requested whether SPR will supply survey results. As these results are crucial to the examination and to determining a decision, SEAS requests that the ExA insist that the full report of findings and results of all new surveys are submitted by SPR as soon as they are available, regardless of Deadlines, and published on PINS website.</p>	<p>Please see <b>Applicants' Responses to Rule 17 Questions of 29 April 2021</b> (REP10-030) which provides details on the different surveys / ground investigations currently being undertaken by the Applicants and how / when the results will be submitted to the Examinations where they will become available during the remainder of the programme.</p>
<b>Disingenuous Responses</b>		
5	<p>In addition, SEAS would like to put on record that SPR's failure to respond to community groups' hard evidence is further confirmation of their cynical attitude to real engagement with the community. SPR's responses constantly refer back to their original application documents, documents that have clearly not addressed the issue or question in the first place hence the reason for writing the submissions. On outstanding issues relating to Biodiversity including the River Hundred, the adverse impact on tourism, the cumulative impact of 10 to 12 years of construction, noise pollution, disruption to local community amenities, SPR has failed to reassure any community member that their concerns are unfounded.</p>	<p>Throughout the Examinations the Applicants have provided detailed written responses to the various submissions made by SEAS and other community groups. In these responses the Applicants have referred to the Applications / their previous submissions to the Examinations where information already provided appears to have been overlooked. Where information has not been provided the Applicants have clearly stated why it is not appropriate or necessary to so.</p> <p>Please see <b>section 2.2 of Applicants' Comments on SEAS' Deadline 9 Submissions</b> (REP10-021) regarding cumulative impact assessment (CIA). The Applicants reiterate that at this stage no further information can be provided regarding the Projects' potential for cumulative impacts with the Nautilus and</p>



## Applicants' Comments on SEAS' Deadline 10 Submissions

7<sup>th</sup> June 2021



ID	SEAS' Comment	Applicants' Comments
		Eurolink due to a lack of information on the latter projects' proposed locations. There is no information regarding proposed North Falls and Five Estuaries projects that would facilitate a CIA, and regardless both projects have confirmed they will not connect near Leiston (see REP7-066 and AS-100).