



SCOTTISHPOWER
RENEWABLES

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on Interested Parties' Deadline 11 Submissions

Applicants: East Anglia ONE North Limited and East Anglia TWO Limited
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Applicable to **East Anglia ONE North** and **East Anglia TWO**



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Glossary of Acronyms

AONB	Area of Outstanding Natural Beauty
CCS	Construction Consolidation Sites
CIA	Cumulative Impact Assessment
CIEEM	Chartered Institute of Ecology and Environmental Management
CION	Connection and Infrastructure Options Note
CIWEM	Chartered institute of Water and Environmental Management
CoCP	Code of Construction Practice
DCO	Development Consent Order
ES	Environmental Statement
ESC	East Suffolk Council
ExA	Examination Authority
HDD	Horizontal Directional Drilling
IEMA	Institute of Environmental Management and Assessment
IOA	Institute of Acoustics
IP	Interested Party
LLFA	Lead Local Flood Authority
NGESO	National Grid Electricity System Operator
NGET	National Grid Electricity Transmission
NSIP	National Significant Infrastructure Project
Ofgem	Office of Gas and Electricity Markets
OFTO	Offshore Transmission Owner
OODMP	Outline Operational Drainage Management Plan
OTNR	Offshore Transmission Network Review
PD	Procedural Decision
SASES	Substation Action Save East Suffolk
SCC	Suffolk County Council
SEAS	Suffolk Energy Action Solutions
SoCC	Statement of Community Consultation
SPR	ScottishPower Renewables
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage System



Glossary of Terminology

Applicants	East Anglia TWO Limited / East Anglia ONE North Limited
Cable sealing end compound	A compound which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Cable sealing end (with circuit breaker) compound	A compound (which includes a circuit breaker) which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
The Councils	East Suffolk Council and Suffolk County Council
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.
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.
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order but will be National Grid owned assets.
National Grid overhead line realignment works	Works required to upgrade the existing electricity pylons and overhead lines (including cable sealing end compounds and cable sealing end (with circuit breaker) compound) to transport electricity from the National Grid substation to the national electricity grid.
National Grid overhead line realignment works area	The proposed area for National Grid overhead line realignment works.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.
National Grid substation location	The proposed location of the National Grid substation.
Onshore cable corridor	The corridor within which the onshore cable route will be located.



Onshore cable route	This is the construction swathe within the onshore cable corridor which would contain onshore cables as well as temporary ground required for construction which includes cable trenches, haul road and spoil storage areas.
Onshore cables	The cables which would bring electricity from landfall to the onshore substation. The onshore cable is comprised of up to six power cables (which may be laid directly within a trench, or laid in cable ducts or protective covers), up to two fibre optic cables and up to two distributed temperature sensing cables.
Onshore development area	The area in which the landfall, onshore cable corridor, onshore substation, landscaping and ecological mitigation areas, temporary construction facilities (such as access roads and construction consolidation sites), and the National Grid Infrastructure will be located.
Onshore infrastructure	The combined name for all of the onshore infrastructure associated with the proposed East Anglia TWO / East Anglia ONE North project from landfall to the connection to the national electricity grid.

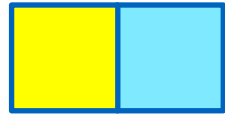


1 Introduction

1. This document presents the Applicants' comments on representations received from Interested Parties (IPs) at Deadline 11. Representations received in respect of the East Anglia TWO and East Anglia ONE North projects (the Projects) from IPs have been grouped by topic in order to avoid repetition in responses. The key topics raised in these representations along with the Applicants' responses have been provided in the respective topic sections (**Section 2.1** to **Section 2.5**). The submissions by the following IPs have been addressed within this document:
 - Alan Bullard (REP11-133);
 - Alan Thomas (REP11-134);
 - Andrew Bell (REP11-136);
 - Beverley Strowger (REP11-137);
 - Carol Bizzell (REP11-138);
 - Christine Gray (REP11-140);
 - Henrietta Palmer (REP11-145);
 - Ian Wiles (REP11-146);
 - Janet Binney (REP11-147);
 - Jill and Peter Donker Curtius (REP11-148);
 - Luigi Beltrandi (REP11-150);
 - Margaret Fife (REP11-151);
 - Nicholas Thorp and Jonathon Burch (REP11-154);
 - Nicola Fulford (REP11-155 and REP11-156);
 - Patricia Dorcey (REP11-157 and REP11-158);
 - Robert Farquharson (REP11-164);
 - Sarah Gammon (REP11-166);
 - Sheridan Steen (REP11-168); and,
 - Sue Thompson (REP11-178).
2. This document is applicable to both the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications (the 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's) 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.

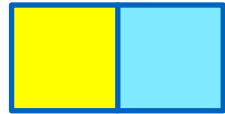


2 Topic by Topic Comments on Interested Parties Deadline 11 Submissions

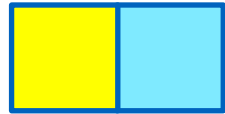
2.1 National Grid

Table 1 Applicants' Comments on National Grid

ID	IPs' D11 Submissions Examination Library Ref Number	Applicants' Comments
Engagement of National Grid		
1	REP11-133; REP11-134	East Anglia TWO Limited and East Anglia ONE North Limited are the Applicants and are seeking consent for all aspects of the works to facilitate the Projects. Examination is a predominantly written process and National Grid Electricity Transmission (NGET) and National Grid Electricity System Operator (NGESO) have responded to all questions put to them by the Examining Authority and NGET has attended a number of hearings.
National Grid Substation Equipment		
2	REP11-133; REP11-134	All National Grid infrastructure proposed is to facilitate the connection of the Projects to the national electricity grid. The National Grid substation is sized appropriately for this stage of the project development (i.e. pre-consent and pre-detailed design), although as noted in the Substations Design Principles Statement (AS-133), the Applicants and NGET will seek to reduce the footprint and size of the National Grid substation where practicable and cost effective to do so during the development of detailed design.
Separate DCO application for the National Grid Substation		
3	REP11-134	The Applicants do not agree that the National Grid Infrastructure should be the subject of a separate DCO.



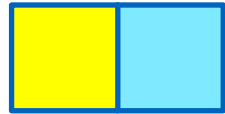
ID	IPs' D11 Submissions Examination Library Ref Number	Applicants' Comments
		<p>The National Grid infrastructure is necessary for the Projects to export electricity to the grid and therefore to ensure delivery of the Projects it was considered necessary and appropriate to include the National Grid infrastructure within the DCO Applications. Paragraph 4.9.2 of NPS EN-1 states that the Government “<i>envisages that wherever possible, applications for new generating stations and related infrastructure should be contained in a single application...</i>” and this is what the Applicants have sought to do.</p> <p>It is not unusual for developers to consent works required to connect their projects to the national grid. Examples of this approach can be found in the Galloper Wind Farm Order 2013 and very recently in the Norfolk Vanguard Offshore Wind Farm Order 2020.</p> <p>The National Grid infrastructure has been fully assessed within the Environmental Statement (ES) and including such works within a separate DCO Application would not change the approach taken to the assessment.</p>
Future Connection to National Grid / Cumulative Impact Assessment (CIA)		
4	REP3-133; REP3-134; REP11-148; REP11-151; REP11-166; REP11-168	<p>The Applicants and NGENSO have confirmed to the Projects' Examinations on a number of times that the National Grid substation proposed by the Applicants, is not a connection hub.</p> <p>Any future project proposing to connect at the Friston substation will require an extension to the National Grid substation, which will require consent from the relevant planning authority or Secretary of State.</p> <p>The Applicants have considered possible future projects within its Applications, in line with the Planning Inspectorate's Advice Note 17 on CIA.</p>



2.2 Substations Design Principles Statement

Table 2 Applicants' Comments on Substations Design Principles Statement

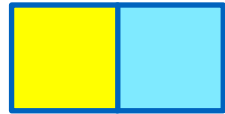
ID	IPs' D11 Submissions Examination Library Ref Number	Applicants' Comments
Independent Design Review		
1	REP11-133; REP11-150; REP11-168	<p>The Applicants have stated on a number of occasions that an independent Power Engineering review is wholly inappropriate. The design principles set out within the Substations Design Principles Statement (AS-133) and the parameters set out within the draft DCO (document reference 3.1) provide sufficient commitments to good design of a substation associated with an offshore windfarm.</p> <p>It is noted that the Substations Design Principles Statement (AS-133) includes a design principle for the substations to be informed by a design review with the Design Council (or similar body), in consultation with the relevant local planning authorities. The output of this design review will inform the onshore substation, National Grid substation and cable sealing end compounds procurement and/or detailed design process.</p>
Changing Policy Framework		
2	REP11-133	<p>The Applicants have developed the Projects primarily having regard to the policies set in NPS EN-1, EN-3 and EN-5. In addition, the Projects have been brought forward in the context of the legal and regulatory framework established through the Electricity Act 1989.</p> <p>The Government has established the Offshore Transmission Owner (OFTO) regime and this has specific provisions relating to the development of grid connections. The White Paper and associated Offshore Transmission Network Review (OTNR) have occurred post application. The White Paper provides updated policy which supports the early deployment of further renewable electricity and a future ambition to alter the offshore grid. The strategic changes to the grid will not be in place during the lifetime of the current consents.</p> <p>The White Paper does not suggest that further deployment should be delayed until this might happen. The clear policy objective is for an acceleration of deployment.</p>



ID	IPs' D11 Submissions Examination Library Ref Number	Applicants' Comments
Sustainable Drainage System (SuDS) Design (Bunds etc.)		
3	REP11-133	<p>The Applicants note Mr Bullard's comments in relation to the level of design detail of the SuDS available at this stage, with particular reference to bunding and engineering design.</p> <p>The final SuDS basins will be determined during detailed design of the Projects, post-consent and once infiltration testing is complete. The approach of carrying out detailed design following the granting of consent is consistent with the requirements of the consenting process for Nationally Significant Infrastructure Projects (NSIPs). At this stage, the Applicants have prepared outline designs based on initial infiltration testing (<i>Infiltration Test Results (May 2021)</i> (AS-129)) and using parameters agreed with Suffolk County Council (SCC) as the Lead Local Flood Authority (LLFA).</p> <p>Regarding bunding, the 'batter slopes' shown around the SuDS basins on the plans and cross sections within Appendix 5 of the OODMP (document reference ExA.AS-37.D12.V6) are typical of what will be required. It is likely that such reprofiling of the land will be necessary for each SuDS basin. However, the gradients and extents of the slopes will depend upon the results of infiltration testing and how these feed into the final basin designs. For example, the basins may be microsituated, reorientated, resized and/or reshaped in order to maximise infiltration potential. Land contours around the final basin designs / locations will influence bunding requirements.</p>
Operational Noise Design Report		
4	REP11-133	<p>In response to a comment raised by Mr Bullard regarding the further submission of a noise design report, the Applicants note that this relates to the Operational Noise Design Report which they have committed to providing to East Suffolk Council (ESC) post-consent within the Substations Design Principles Statement (AS-133). This commitment was made during the Examinations to address representations from ESC regarding the control of operational noise. The preparation of an Operational Noise Design Report post-consent during detailed design (to be submitted to and approved by the relevant planning authority pursuant to Requirement 12(2) of the draft</p>



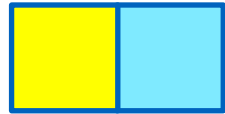
ID	IPs' D11 Submissions Examination Library Ref Number	Applicants' Comments
		<p>DCO (document reference 3.1)) will ensure that operational noise controls are considered within the final substations design process, to facilitate the Applicants in meeting its commitment in seeking “<i>to minimise the operational noise rating level below the limits set out in Requirement 27 of the draft DCO and avoid any perceptible tones and other acoustic features at any residential receptor that would attract a correction</i>” in accordance with the relevant guidance.</p> <p>To clarify, the Operational Noise Design Report will not be submitted to the Examinations and will not form part of the Applications.</p>



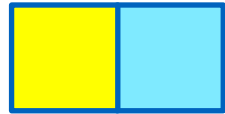
2.3 Siting

Table 3 Applicants' Comments on Siting

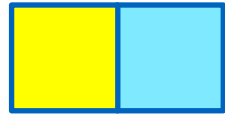
ID	IPs' D11 Submissions Examination Library Ref Number	Applicants' Comments
Site Selection and Alternative Sites		
1	REP11-133; REP11-134; REP11-146; REP11-151; REP11-168	<p>In response to multiple representations on the site selection process, the Applicants refer to Sections 2.24, 2.25 and 2.2.6 of the Applicant's Comments on Relevant Representations - Volume 2: Individual Stakeholders (AS-035). These address similar comments raised in respect of landfall selection, onshore cable route development and identification of the substation locations respectively. Early on in the development of the Applications, the Applicants undertook an extensive site selection process which is set out within Chapter 4 of the ES (APP-052) and the associated appendices (APP-442 to APP-447). The process identified eight zones as potential substation sites within the onshore study area based on available space, whilst applying a 250m avoidance buffer around residential properties as a proxy to minimise disturbance to residents.</p> <p>The culmination of the various work streams, as described in Section 4.9.1.3, Chapter 4 of the ES (APP-052), enabled the Applicants to determine that the substation zone northeast of Friston (Zone 7) was preferred accounting for environmental, engineering and economic factors.</p> <p>In response to comments querying why the substations could not instead be sited at Bramford, this was driven by the connection offer made by National Grid. Section 4.7.5 of Chapter 4 (APP-052) provides an overview of the Connection and Infrastructure Options Note (CION) process in respect of the grid connection location. In 2010, Bramford was the most economic and efficient connection point for the East Anglia ONE, East Anglia TWO and East Anglia THREE projects at that time. In 2016 ScottishPower Renewables (SPR) identified the redefined East Anglia TWO and East Anglia ONE North projects as the next projects to be brought forward for development consent.</p> <p>SPR, as the parent company of the Applicants, engaged with National Grid in early 2017 to determine connection options for the Projects based on contracted background at that time and reflecting the Projects' timescales and reduced capacities. National Grid advised that due to the changing contracted background,</p>



ID	IPs' D11 Submissions Examination Library Ref Number	Applicants' Comments
		<p>connection capacity could be available in the Sizewell / Leiston area. The CION process was subsequently triggered and concluded that the most economic and efficient connections for the Projects, while considering environmental and programme implications, would be into the circuits in or around Leiston (see Issue Specific Hearing 2 Written Summary of Oral Case (REP3-085) for a summary of the CION process).</p> <p>Regarding Mr Wiles submission in relation to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB), the Applicants are aware of the special qualities of this designation and have taken account of it within the assessment of landscape and visual effects within Chapter 29 of the ES (APP-077). Further consideration of the policy surrounding AONBs has been undertaken, as set out within the Applicants' Effects with Regard to the Statutory Purposes of the Suffolk Coast and Heaths AONB and Accordance with NPS Policy (REP2-008). The presence of the AONB and the avoidance of impacts upon it were key factors in determining that the substations should be located further inland.</p> <p>Regarding Mr Bullard's comments on the consideration of flood risk in selecting the locations of the National Grid substation and the onshore substation, As set out within Chapter 4 of the ES (APP-052), the Applicants site selection process initially focussed on flood risk from fluvial sources. The locations selected for key elements of the Projects (e.g. the onshore substations) are within areas at low risk of surface water flooding (i.e. outside the extent of the 1 in 1,000 year surface water flooding event).</p> <p>During site selection a surface water conveyance route was identified which partly passes through the northern perimeter of what is now the proposed location of the National Grid substation. However, a surface water conveyance route does not in itself indicate the magnitude of a pluvial flood risk. For example, depth of surface water and velocity of flow are factors with multiple parameters (e.g. intensity and duration of a rainfall event, permeability of ground and topography etc.). Additionally, features can easily be moved / accommodated elsewhere. The Applicants consider that the presence of a surface water flow route is in no way sufficient to discount a location from development.</p> <p>The Applicants also note that the Friston Surface Water Management Study (BMT, 2020), commissioned by SCC following the 2019 flooding events in Friston, determines that the National Grid infrastructure and onshore substation locations are only minor contributors to the flow upstream of Friston and that they have no significant</p>



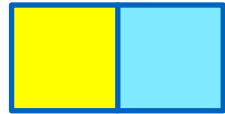
ID	IPs' D11 Submissions Examination Library Ref Number	Applicants' Comments
		surface water flood risk. The validated numerical model that informs the Friston Surface Water Management Study provides no evidence that the substation locations significantly contribute to any predicted flooded properties in up to a 1 in 100 year event plus climate change.



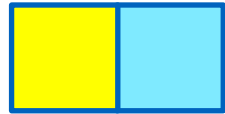
2.4 Issue Specific Hearing 16 (ISH 16) – Proposed Substations Site

Table 4 Applicants Comments on ISH16

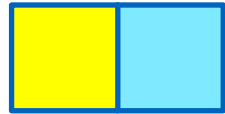
ID	IPs' D11 Submissions Examination Library Ref Number	Applicants' Comments
Infiltration Rates and Ground Water Level		
1	REP11-133; REP11-156	<p>The Applicants note that the results of the infiltration testing available at the time of ISH16 were preliminary. More comprehensive infiltration testing was undertaken during May 2021, the results of which are presented within the <i>Infiltration Test Results (May 2021)</i> submitted following Deadline 11 (AS-129). The results of the May 2021 infiltration testing have been discussed with SCC as the LLFA and the design parameters used within the updated <i>Outline Operational Drainage Management Plan (OODMP)</i> (document reference ExA.AS-37.D12.V6) agreed. Further infiltration testing will be undertaken post-consent to inform the final Operational Drainage Management Plan submitted for approval to the relevant planning authority for approval in consultation with SCC and the Environment Agency pursuant to Requirement 41 of the <i>draft DCO</i> (document reference 3.1).</p> <p>Regarding Mr Bullard's representations in relation to the level of groundwater, the Applicants note that groundwater was not encountered during the infiltration testing (AS-129). Long-term survey data is required to establish the groundwater level. Whilst that data is not available at this stage it is anticipated this will become available post-consent.</p> <p>The Applicants note there may be a small effect on the infiltration rates at locations of heavy construction plant and equipment use. However, it is noted that any soil compaction would be confined to the upper layers of strata, close to the surface of the ground. During the creation of the SuDS basins, the surface layer of the ground is anticipated to be excavated, therefore removing the compacted surface layer.</p> <p>It is also noted that construction plant and equipment will mostly be concentrated within the substation footprint and the associated Construction Consolidation Sites (CCSs), the arrangement of which is presented on <i>Figure 2, Appendix 2</i> of the <i>Outline Code of Construction Practice</i> (Outline CoCP) (document reference 8.1). Both the main temporary SuDS basins associated with the construction phase and the permanent SuDS basins associated with the operation phase are anticipated to be located outside of the substations and CCS footprints. As such, it is</p>



ID	IPs' D11 Submissions Examination Library Ref Number	Applicants' Comments
		considered unlikely that significant compression of the ground would be experienced in the location of the SuDS basins.
Construction Phase Drainage Management		
2	REP11-133; REP11-138	The Applicants noted the discussions within ISH16 and the corresponding actions regarding construction phase surface water management and have updated Section 11 of the Outline CoCP (document reference 8.1) with an indicative temporary surface water management scheme for the onshore substations and along an illustrative stretch of the onshore cable route. It is anticipated that the scheme will be significantly refined post-consent at such time that more detailed design information is available for the construction phase of the Projects.
Flood Risk in Friston		
3	REP11-133; REP11-134; REP11-138; REP11-154; REP11-168	<p>Regarding assertions that the National Grid and onshore substations would put Friston at risk of flooding, the Applicants do not question that Friston has suffered from flooding. However, the Friston Surface Water Management Study (BMT, 2020) commissioned by SCC following the 2019 flooding events in Friston determines that the National Grid infrastructure and onshore substation locations are only minor contributors to the flow upstream of Friston and that they have no significant surface water flood risk. The operational Projects will significantly reduce flow from the substation locations by containing surface water run-off before releasing it at a controlled rate. The Applicants believe that any claims that the Projects will increase flood risk in Friston are not supported by the available evidence.</p> <p>The Applicants have now undertaken initial infiltration testing at the proposed locations of the sustainable drainage system (SuDS) basins for operation of the National Grid substation and onshore substations. Based on the test results (Infiltration Test Results (May 2021) (AS-129)), the Applicants and the SCC have agreed appropriate outline design parameters for the SuDS basins and these are presented in the OODMP (document reference ExA.AS-37.D12.V6).</p>



ID	IPs' D11 Submissions Examination Library Ref Number	Applicants' Comments
		<p>From the outset the Applicants have committed to mitigating and managing surface water within the Order limits so as not to exacerbate flood risk to downstream receptors and the evidence supports that this is possible. In higher return period events, the Applicants anticipate the operational SuDS will provide a betterment to the existing surface water regime within the Order limits, in turn providing protection for both the Projects and the residents of Friston by containing excess surface water and ensuring it is discharged as a controlled rate.</p>



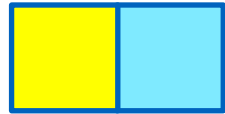
2.5 Miscellaneous

Table 5 Applicants' Comments on Miscellaneous Topics

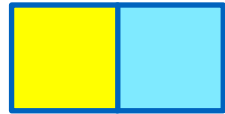
ID	IPs' D11 Submissions Examination Library Ref Number	Applicants' Comments
Consultation		
1	REP11-136; REP11-147; REP11-148; REP11-155; REP11-166; REP11-168	<p>Regarding consultation on site investigation works, please refer to ID4 of this table.</p> <p>Consultation is recognised by the Applicants as being a key feature of the Environmental Impact Assessment (EIA) process that should continue throughout the lifecycle of a project, from its initial stages through to consent and post-consent. Consultation has been undertaken through the informal and formal pre-application stages, including the formal submission of the Scoping Report (SPR 2017)¹ in November 2017 and the Preliminary Environmental Information Report (PEIR) in February 2019 (SPR 2019)².</p> <p>The Applicants produced a Statement of Community Consultation (SoCC) in March 2018. The SoCC set out how the Applicants would consult with local communities on the Projects as required under the Planning Act 2008. It detailed the opportunities available for local communities to come and meet the Applicants to ask questions and to comment on the plans for the Projects. The SoCC also gave notification of the intention to hold Public Information Days (PIDs) and gave an indication of when these would take place. The Projects SoCC (published 6th March 2018) is found in Appendix 3.2 of the Consultation Report (APP-029). The Applicants undertook statutory consultation of the SoCC as described in Section 3.4.2 of the Consultation Report. The SoCC was then publicised in local East Anglian newspapers (Eastern Daily Press, East Anglian Daily Times, Ipswich Star and Fishing News) on two separate occasions and dates as set out in Section 3.4.3 of the Consultation Report. The SoCC was later updated to introduce developments regarding the Projects and an additional phase of consultation, Phase 3.5, in order to engage with local communities (Section 3.5 of the Consultation Report).</p>

¹ ScottishPower Renewables (2017) East Anglia TWO Offshore Windfarm Environmental Impact Assessment Scoping Report.

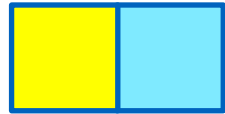
² ScottishPower Renewables (2017) East Anglia TWO Offshore Windfarm Preliminary Environmental Information Report



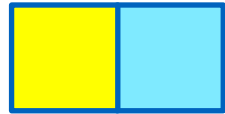
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		<p>A summary of the range of measures adopted during consultation are presented below; agreed through the SoCC (as updated), and summarised in the Consultation Report (APP-029):</p> <ul style="list-style-type: none"> • PIDs held at locations within and adjacent to the onshore study area. PIDs were held on the following dates: <ul style="list-style-type: none"> ○ Phase 1 held between 30th October and 2nd November 2017 in Southwold, Leiston, Lowestoft and Orford; ○ Phase 2 held between 17th and 25th March 2018 in Lowestoft, Southwold, Leiston, Thorpeness, Aldeburgh and Orford; ○ Phase 3 held between 28th June and 28th July in Orford, Friston, Leiston, Southwold, Lowestoft, Aldeburgh and Thorpeness; ○ Phase 3.5 held between 9th October 2018 and 15th October 2018; ○ Phase 4 held between 11th February and 26th March 2019 <p>Phase 1 informal consultation (October / November 2017) with statutory consultees and the public designed to introduce the Projects to local communities and to inform on the approach to EIA, whilst also providing an opportunity for feedback to be provided to the Applicants. At this stage there could be no formal consultation because the onshore infrastructure locations were only indicative areas i.e. 'areas of search' forming the 'Onshore Study Area'. It was communicated that this would be refined and form part of the consultation process;</p> <ul style="list-style-type: none"> • Between Phase 1 and Phase 2 the Planning Inspectorate consulted with organisations (including Friston Parish Council) on both the onshore and offshore works for the Projects. A formal Scoping Opinion (APP-033) was provided by the Planning Inspectorate in December 2017; • Phase 2 formal consultation (March / April 2018) with statutory consultees and the public in order to provide further information on the indicative onshore development area and substation zones for the intended onshore electrical infrastructure and to obtain comments on viewpoints selected to assess the visual impacts of the offshore wind turbines. The Applicants requested to meet with Friston Parish Council in February 2019 and were thereafter given a 20 minute allocation at a Council meeting on 5th March. This was an appropriate time to consult on potential issues as there was sufficient information available at this



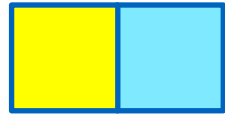
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		<p>stage. This was followed up with further consultation at Phase 3 and Phase 3.5 regarding the onshore substation locations;</p> <ul style="list-style-type: none"> • Phase 3 formal consultation (May to August 2018) with statutory consultees and the public in order to show the Indicative Onshore Development Area for onshore infrastructure, including the proposed substation location north of Friston (known as Grove Wood) and to update consultees on general proposed development plans; • Phase 3.5 formal consultation (September to November 2018 and including four community engagement events held in October 2018) with statutory consultees and the public to consult upon an alternative substation location between Leiston and Sizewell known as Broom Covert, as well as the Grove Wood site at Friston. The alternative substation location would make use of land which is part of mitigation measures for the proposed Sizewell C power station. The Applicants therefore also consulted on alternative mitigation land areas which could be used for the Sizewell C development. Consultation was also undertaken with communities where traffic and transport modifications may be required. Options to ensure appropriate connection to the surface water drainage network were also consulted on; • Phase 4 formal consultation (February / March 2019) with statutory consultees and the public (including publication of the PEIR and Section 42 consultation with statutory consultees) in order to consult upon the PEIR for the Projects. This included details of the preliminary environmental assessment findings, a description of the proposals and baseline environmental information collected (to date). The PEIR identified the potential impacts of the Projects including cumulative impacts as relevant, and where necessary has identified possible mitigation measures to reduce, prevent or offset these. The PEIR was consulted upon directly with statutory consultees and prescribed consultation bodies, Local Planning Authorities and persons with an interest in the land. The Applicants also consulted with local communities, the wider public and other organisations on the PEIR; • PID summary reports shared with all registered participants, key local and community stakeholders, and on the Projects' websites for Phase 2, Phase 3 and Phase 4 community engagement events; • Parish Council briefings; • Direct discussions with landowners;



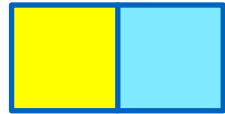
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		<ul style="list-style-type: none"> • The Applicants and the Applicants' land agents have met affected landowners and / or their appointed land agents. A number of preferences for the routeing of the onshore cable route have been put forward by those affected by the proposed onshore development area and a number of those suggestions have been incorporated into the proposed onshore development area boundary; • The Applicants have engaged with landowners regarding survey access through consultation meetings. Letters were sent to all affected parties offering to meet to discuss the Projects proposals; • Bi-annual newsletters distributed throughout the onshore substation(s) site selection study area once the area had been defined. The Autumn/Winter 2017/18 newsletter was distributed prior to Phase 1 consultation when the onshore study area was east of the Aldeburgh Road but the Summer 2018 issue was distributed to the wider onshore development area and all copies after that (once the study area was extended west to avoid the Suffolk Coast and Heaths AONB). This lag in distribution is noted by the Applicants, however the extent of coverage is dependent on developments regarding the Projects and meaningful information as and when it becomes available; • Provision of a dedicated website for the Projects; • Regular and targeted discussion with regulators and other stakeholder bodies through various means including Expert Topic Group meetings (Groups comprising experts on a particular topic, formed to discuss details of data requirements, and which report to the Steering Group); and • Dedicated e-mail address for the Projects and freepost address to assist local communities in contacting the Applicants. <p>With regard to consultation on the National Grid infrastructure element of the proposals, National Grid infrastructure forms part of the Applications (Chapter 6 of the ES (APP-054)) submitted by the Applicants. The Applicants have engaged in consultation on behalf of National Grid. Section 3.1 of the Submission for Oral Case: Preliminary meeting (Part 1) (PDC-001) provides further information on the inclusion of National Grid infrastructure within the Applications. The Applicants have also engaged with National Grid since the Projects' inception. Outcomes of this engagement and developments regarding the Projects have been subsequently communicated to stakeholders as described in the Consultation Report (APP-029). The Applicants have also progressed Statements of Common</p>



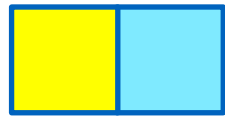
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		<p>Ground (SoCG) with National Grid Electricity Transmission (REP1-064), and NGENSO (REP1-063) , final versions of which were submitted at Deadline 8 (REP8-116 and REP8-115 respectively).</p> <p>During the Examinations, consultation has continued with members of the public (e.g. see AS-035) and IPs through written communication. The Examination deadlines allow IPs to make representations with the Applicants providing responses as appropriate in the form of, for example, clarifications, project updates following refinements in design as a result of the consultation process etc. Doing so through the formal setting of the Examination process allows the Examining Authority to weigh up the positions of IPs and the Applicants ensuring public involvement throughout the process.</p> <p>Post consent, the Applicants will continue to consult with the local community as secured through the Substations Design Principles Statement (AS-133) which provides a sound framework for progressing the detailed design at the appropriate stage in the Projects' development cycle and provides for public engagement and independent design review through the Design Council (or similar).</p>
Reference to Prime Minister's PMQ response with regard to an Offshore Transmission Network		
2	REP11-136; REP11-145; REP11-140; REP11-146; REP11-148; REP11-164; REP11-178	<p>The Applicants have responded in full to Offshore Transmission Network matters in Procedural Deadline C - Submission of Oral Case – Preliminary Meeting (Part 1) (PDC-001). The Applicants also refer to section 2.5.2 of Written Summary of Oral Case ISH 2 (REP3-085) submitted at Deadline 3 regarding the BEIS offshore transmission review. In summary, the timetable for the significant reform required to establish a new regulatory and technical framework for an offshore transmission network is likely to take a number of years. The Applicants have submitted Applications for development consent for the Projects in line with the regulatory regime for offshore transmission networks established by Office of Gas and Electricity Markets (Ofgem). Changes to a coordinated approach on offshore transmission would require regulatory change to deliver it. Given the considerable time periods that would be involved in developing this, the Applicants have a legitimate expectation that the Projects will be considered within the current regulatory framework in light of paragraph 2.6.34 of National Policy Statement EN-3. The Applicants note the response of Rt. Hon. Kwasi Kwarteng MP, the then Minister of State for Business, Energy</p>



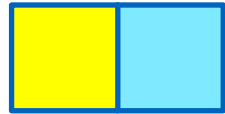
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		<p>and Clean Growth, 1st September 2020 to Substation Action Save East Suffolk (SASES) and Suffolk Energy Action Solutions (SEAS) (Appendix 2 of REP2-017) which supports the Applicants' position.</p> <p><i>“Due to the long lead times for offshore wind projects (8-10 years) many projects connecting before 2025 are either already consented or nearing the end of the consenting process. Introducing regulatory uncertainty and changing plans for well advanced projects would increase costs for consumers and make meeting ambitious 2030 and 2050 targets even more challenging.</i></p> <p>....</p> <p><i>Our intention regarding the enduring regime is to communicate the direction of travel during 2021; as you rightly state, this is a very complex issue that touches on many policy areas across several organisations. We do, however, expect that a significant portion of the work will be completed during 2021, so that clarity can be provided for those projects connecting after 2030” (Applicants' emphasis).</i></p> <p>The Applicants have sought to minimise disruption by committing to installing the cables and ducting for the second project in parallel, thereby maximising efficiency.</p> <p>The Prime Minister's statement is consistent with what is stated in the White Paper. The key bullet on page 80 states :</p> <p style="text-align: center;"><i>“To minimise the impact on local communities, we will implement a more efficient approach to connecting offshore generation to the mainland grid”.</i></p> <p>The White Paper then describes how it proposes to develop the enduring regime.</p>
Split Decision (Onshore / Offshore)		
3	REP11-136; REP11-138; REP11-140; REP11-145; REP11-147; REP11-148; REP11-164	The Applicants note that a split decision (i.e. consenting the offshore infrastructure but refusing the onshore) would achieve nothing. The supply chain would no longer invest or engage and there would be insufficient time to develop alternative technologies carry out new surveys and consent an alternative grid option. The Applicants' parent company has engaged with the global supply chain and is fully aware of the technologies that will be commercially



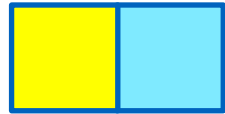
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		available in the short to medium term. The split decision would be inconsistent with the Government's ambition to accelerate the deployment of renewable electricity and would not support the green recovery. It would also not support the Government's urgent response to the challenges of climate change.
Site Investigation Works		
4	REP11-137; REP11-147; REP11-148; REP11-151; REP11-155; REP11-156; REP11-157; REP11-178	<p>The Applicants position on site works is stated within Applicants' Statement regarding Ground Investigation Works Update (REP10-029) submitted at Deadline 10 which contains further information on engagement with the local community, councils and other organisations.</p> <p>The Applicants have provided regular updates to Parish Councils, key interest groups and individuals. Please see list of dates when notifications and updates have been circulated below: 17/03/21 09/04/21 27/04/21 01/05/21 06/05/21 11/05/21 12/05/21 14/05/21 19/05/21 20/05/21 28/05/21 x 2 03/06/21 08/06/21 10/06/21 15/06/21. A further update was issued week commencing 21-06-21.</p> <p>The dedicated area of the project website for a targeted community engagement programme went live on 3rd June 2021. This provides information on local works updates to support with construction activity or the pre-enabling works that are being carried out now. This is in addition to the Applicants' other communications; letter drops and emails.</p> <p>https://www.scottishpowerrenewables.com/pages/east_anglia.aspx</p> <p>In addition, we have altered the subscribe area of the website to enable people to select if they would like to receive Local Works Updates via email.</p> <p>https://www.scottishpowerrenewables.com/pages/east_anglia_contact_us.aspx</p>



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		<p>The infiltration results have been submitted to the Examining Authority and were subsequently published on 14th June 2021 (AS-129). These have also been discussed in a technical meeting with SCC and SASSES on the 16th of June.</p> <p>With regard to a compound which had been blown over in strong winds, the Heras fencing and acoustic barriers were left set-up on a borehole drilling site following completion of drilling and before collection of the remaining equipment. The fencing and acoustic barriers had blown over following a weekend of strong winds. The fencing and remaining equipment were subsequently removed the following week.</p> <p>The Applicants have undertaken a robust assessment of the local Tourism industry including an assessment on the potential economic impacts.</p> <p>With regard to the removal of land adjacent to the Wardens Trust please refer to the Applicants submission at Deadline 11 (REP11-053).</p> <p>The Applicants have stated their position on the alleged use of gagging clauses within the Applicants' Comments on SEAS' Non-Disclosure Agreement Complaint (REP10-031).</p>
Compulsory Acquisition		
5	REP11-146; REP11-164; REP11-166; REP11-178	With respect to the accusations that the Applicants are using compulsory acquisition powers to gag landowners, see the Applicants' responses to SEAS within REP7-061, REP9-010 and REP10-031.
Independence of Surveys Undertaken		
6	REP11-164	Regarding the independence of surveyors, the Applicants would note that, across the spectrum of consenting regimes, where specialist surveys or assessments are required these are commissioned by developers. This occurs for numerous reasons, not least of all so developers bear the financial costs, but more importantly to ensure they are cognisant of the environmental sensitivities when progressing their proposals. Surveyors have to discharge their



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		<p>responsibilities in strict accordance with their industry's best practice guidance and to provide impartial advice to developers, indeed it is essential for the retention of the professional qualifications and memberships that enable them to operate.</p> <p>The approach taken to the EIA presented as part of the Applications falls in line with best practice guidelines such as the EIA Guide to Shaping Quality Development prepared by the Institute of Environmental Management and Assessment (IEMA) (the professional body for environment and sustainability specialists). An ES must be prepared by competent experts; the ES submitted as part of the Applications was prepared by specialists accredited by a range of relevant professional organisations, for example IEMA, the Chartered Institute of Ecology and Environmental Management (CIEEM), Chartered Institute of Water and Environmental Management (CIWEM), the Institute of Acoustics (IOA), and the Chartered Institute of Environmental Health. All surveys in support of the Applications were undertaken by suitably qualified individuals within the optimal surveying windows. All surveys have been undertaken in accordance with industry guidance.</p>
Coastal Erosion		
7	REP11-158; REP11-148	<p>Regarding the landfall location north of Thorpeness and cliff stability in the region, the Applicants have undertaken an engineering feasibility study which reviewed the potential landfall options and considered beach and sea bed geology, tides and currents, fishing and anchorage interactions, potential access for cable vessels and cable protection requirements. Suitable offshore cable corridor and landfall locations were subsequently determined and considered factors such as:</p> <ul style="list-style-type: none"> • Environmental and policy constraints; • Avoidance of physical impacts (as far as possible) to the Coralline Crag formation; • Maximise distance (as far as possible) between offshore cable installation and EDF Energy's intake structures; and • Avoid surface laid offshore cable protection or offshore cable crossings in shallow waters (<20m) as far as possible.



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		<p>The landfall location to the north of Thorpeness was deemed to be the preferred location for the following reasons:</p> <ul style="list-style-type: none"> • The landfall can accommodate onshore cable requirements for both the Projects; • Direct impacts on the Site of Special Scientific Interest (SSSI) designated at Sizewell Cliffs (Leiston - Aldeburgh SSSI) will be avoided through the use of Horizontal Directional Drilling (HDD) techniques; • Effects on the Coralline Crag rock formation offshore from the coastline will be avoided through the use of HDD; • There is sufficient space in the identified area to accommodate set back from the cliff line to reduce risk associated with coastal erosion; and • Direct interaction with the beach can be avoided through the use of HDD techniques. <p>The Applicants have prepared and submitted an Outline Landfall Construction Method Statement (document reference ExA.AS-1.D12.V4) outlining the methodology of the construction works to bring the export cables ashore at the landfall. Pursuant with Requirement 13 of the draft DCO (document reference 3.1) the Applicants will prepare a final Landfall Construction Method Statement which accords with the Outline Landfall Construction Method Statement (document reference ExA.AS-1.D12.V4) post-consent for submission to and approval by the relevant planning authority in consultation with the relevant statutory nature conservation body (Natural England). The final Landfall Construction Method Statement must include a landfall monitoring plan in accordance with the outline landfall monitoring plan provided as Appendix 2 to the Outline Landfall Construction Method Statement (document reference ExA.AS-1.D12.V4). The monitoring plan will set out strict monitoring requirements, which must be fulfilled to comply with Requirement 13(2) of the draft DCO (document reference 3.1).</p>