



East Anglia TWO Offshore Windfarm

Appendix 5.1 EIA Methodology Consultation Responses

Environmental Statement Volume 3

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Glossary of Acronyms

AONB	Area of Natural Beauty
DCO	Development Consent Order
EEA	European Economic Area
EIA	Environmental Impact Assessment
EPP	Evidence Plan Process
ES	Environmental Statement
ETG	Expert Topic Group
HRA	Habitat Regulations Assessment
HVDC	High Voltage Direct Current
MS	Method Statement
NE	Natural England
NGV	National Grid Ventures
NSIP	Nationally Significant Infrastructure Project
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
RSPB	Royal Society for the Protection of Birds
SoS	Secretary of State
SPR	ScottishPower Renewables

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5.1 Consultation Responses

5.1.1 Introduction

1. This appendix covers those statutory consultation responses that have been received as a response to the Scoping Report (2017), the Preliminary Environmental Information Report (PEIR) (2019) and Expert Topic Group (ETG) Meetings.
2. Responses from stakeholders and regard given by the Applicant have been captured in **Table A5. 1**.
3. As Section 42 consultation for the proposed East Anglia TWO project was conducted in parallel with the proposed East Anglia ONE North project, where appropriate, stakeholder comments which were specific to East Anglia ONE North, but may be of relevance East Anglia TWO, have also been included in the consultation responses for East Anglia TWO.

Table A5. 1 Scoping Responses Related to Chapter 5 EIA Methodology

Consultee	Date/ Document	Comment	Response / where addressed in the ES
<p>The following comments were received prior to consultation on the PEIR and were in response to the Scoping Report or direct consultation with stakeholders. These comments were taken into account in the production of the PEIR.</p>			
Natural England	08/12/2017 Scoping Response	<p>It is proposed to assess impacts associated with the construction, operation and decommissioning of EA2 by identifying the sensitivity of each receptor and the magnitude of each effect and combining both metrics together through a matrix analysis to determine impact significance. Effect magnitude will be defined via the extent, duration, frequency and change relative to the baseline, and receptor sensitivity will be determined through the adaptability/tolerance, recoverability and value/importance of each receptor. We advise that the ES should include a clear description of how each of the categories for extent, duration and frequency are defined and similarly for the sensitivity categories of vulnerability, recoverability and value. The ES should also include a description of how the various combinations of frequency, duration, extent and reversibility of effects have been combined to reach the final prediction of effect magnitude. Similarly, a discussion should be included as to how the various combinations of receptor sensitivity, probability of interaction and magnitude of effect have been combined to reach the final determination of impact significance. The magnitude and sensitivity scores which contribute to the final impact assessment should be presented for each of the receptors included in the assessment. This should be supported by appropriate references to scientific literature. Where conclusions are based on expert judgements this should be clearly described and discussed in the text. Furthermore, we highlight the importance and difficulty of establishing the uncertainty associated with data. The level of uncertainty/confidence associated with each significance assessment should be discussed based on the nature of evidence used and how this evidence was used to determine impact significance. There might be effects or receptors for which the proposed assessment approach may not be suitable. This should be assessed on</p>	<p>A description of the approach to the assessment of impacts (including frequency, duration, extent, reversibility, sensitivity and magnitude) is described within this chapter. This approach is applied through all technical chapters, and where a different approach is applied, this is clearly stated within the respective chapter.</p> <p>Additionally, all data sources, uncertainty and where expert judgement has been applied are clearly stated within each chapter.</p>

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		an effect/receptor basis. Where a different approach is chosen this should be clearly justified and the approach fully explained within the application.	
The Planning Inspectorate	20/12/2017 Scoping Response	Where parameters are applied the Applicant should ensure that each aspect chapter of the ES sets out the worst case scenario in relation to the specific assessment being undertaken and that this is explained. The worst case scenario will not necessarily be the same for each assessment.	Each technical chapter outlines the realistic worst case scenario that has been assessed specific to each receptor / impact which can differ across topics. A table of the relevant worst case scenario is provided in each technical chapter.
The Planning Inspectorate	20/12/2017 Scoping Response	The Inspectorate welcomes the Applicant's intent to include a summary of the matters proposed to be scoped in and out for each relevant aspect assessed in the ES.	Acknowledged.
The Planning Inspectorate	20/12/2017 Scoping Response	Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/minimise adverse effects is secured through Development Consent Order (DCO) requirements (or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.	Measures proposed to prevent / minimise adverse effects have been or will be agreed with relevant consultees through the ETG and these measures are discussed in each relevant chapter. This Environmental Statement (ES) clearly detail how these measures are secured through DCO requirements.
The Planning Inspectorate	20/12/2017 Scoping Response	The Inspectorate recommends that in order to assist the decision-making process, the Applicant uses tables: (a) to demonstrate how the assessment has taken account of this Opinion;	Tables have been used throughout the ES to present responses to Scoping Opinions, residual effects after mitigation, interrelationships, cumulative effects and proposed mitigation. These are outlined in

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		<p>(b) to identify and collate the residual effects after mitigation for each of the aspect chapters, including the relevant interrelationships and cumulative effects;</p> <p>(c) to set out the proposed mitigation and/or monitoring measures including cross-reference to the means of securing such measures (e.g. a DCO requirement);</p> <p>(d) to describe any remedial measures that are identified as being necessary following monitoring; and</p> <p>(e) to identify where details in the Habitats Regulation Assessment (HRA) report (where relevant), such as descriptions of European sites and their locations, together with any mitigation or compensation measures, are to be found in the ES.</p>	each technical chapter. Details from the Information to Support Appropriate Assessment Report (document reference: 5.3) (where relevant) have been drawn into each technical chapter.
The Planning Inspectorate	20/12/2017 Scoping Response	The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.	Noted, any difficulties are clearly stated where appropriate.
The Planning Inspectorate	20/12/2017 Scoping Response	The level of information provided in the aspects chapters on the assessment study area(s) varies and is very limited in some chapters. The ES must clearly identify and justify the extent of the study area for each assessment.	Noted, each technical chapter includes detailed justification on the extent of the study area for each assessment.
The Planning Inspectorate	20/12/2017 Scoping Response	The Inspectorate notes that for particular aspects detailed information on the proposed methodology and potential impacts is contained within the Method Statements (MS) of the Scoping Report at Appendices 2.1 – 2.6 and in Appendix 4.1. The Inspectorate expects that such information will be updated as necessary and included within the respective aspect chapters of the ES.	Each technical chapter includes detailed information on the specific methodology applied and potential impacts.

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The Planning Inspectorate	20/12/2017 Scoping Response	The ES should include a description of the baseline scenario with and without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.	Baseline scenarios are clearly stated within each technical chapter.
The Planning Inspectorate	20/12/2017 Scoping Response	The ES should contain the timescales upon which the surveys which underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each aspect chapter.	Timescales of all surveys undertaken to inform assessments are included in respective technical chapters.
The Planning Inspectorate	20/12/2017 Scoping Response	The Inspectorate expects the ES to include a chapter setting out the overarching methodology for the EIA, which clearly states which effects are 'significant' and 'non-significant' for the purposes of the EIA. The Inspectorate notes that, in addition to definitions of receptor sensitivity and effect magnitude, a number of the MSs [Method Statements], for example Fish Ecology and Ornithology, state that the 'value' of a receptor may also be considered in the assessment, and provide definitions of a range of values. However, it is not clear how these will influence the assessment of significance. The ES should explain for each aspect chapter how receptor value is determined and how it is used in the assessment of significance. Any departure from the methodology should be described in individual aspect assessment chapters.	These details are provided throughout this chapter. In addition, each technical chapter explains how specific receptor values are determined and used in assessment of significance.
The Planning Inspectorate	20/12/2017 Scoping Response	The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in	These details are included in chapters 19 Ground Conditions and Contamination, 20 Air Quality, 21 Water Resources and Flood Risk and 22 Land Use in

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		a clear and consistent fashion and may be integrated into the relevant aspect assessments.	relation to all phases of development.
The Planning Inspectorate	20/12/2017 Scoping Response	Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured, ideally with reference to specific DCO requirements or other legally binding agreements.	Where relevant, each technical chapter includes embedded mitigation in the initial assessment of impact as well as an assessment of the post-mitigation residual impact. A Schedule of Mitigation (offshore and onshore) (document references: 6.6 and 6.7) have been provided as part of the DCO application, which details how mitigation will be secured.
The Planning Inspectorate	20/12/2017 Scoping Response	Paragraph 183 of the Scoping Report states that a number of documents that form part of the DCO application will also support the ES, and will include information on proposed mitigation. The Inspectorate requires that any measures proposed to mitigate the assessed effects identified in the ES should be described in the relevant aspect chapters of the ES.	Noted. Measures proposed to mitigate the assessed effects are included in relevant technical chapters.
The Planning Inspectorate	20/12/2017 Scoping Response	The ES should include a description of the potential vulnerability of the Proposed Development to risks of major accidents and/or disasters, including vulnerability to climate change, which are relevant to the Proposed Development. Relevant information available and obtained through risk assessments pursuant to European Union legislation, such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to	These details are addressed within section 6.9 of Chapter 6 Project Description .

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		prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.	
The Planning Inspectorate	20/12/2017 Scoping Response	Paragraph 180 of the Scoping Report states that major accidents and disasters will be considered in the EIA in the context of how the Proposed Development is designed and the measures in place in case of emergency, for example, in relation to pollution prevention and response. The EIA should also identify if the Proposed Development itself has the potential to cause major accidents or disasters during construction, operation or decommissioning.	Noted, this is presented in Chapter 6 Project Description and where relevant details are addressed within technical chapters.
The Planning Inspectorate	20/12/2017 Scoping Response	Schedule 4 Part 5 of the EIA Regulations requires a description to be provided in an ES of the likely significant transboundary effects. The Inspectorate notes that the Applicant has indicated in the Scoping Report whether the Proposed Development is likely to have significant impacts on another European Economic Area (EEA) State. It is stated in paragraph 178 of the Scoping Report that transboundary effects are not relevant to onshore aspects. It should be clarified in the ES that this is the Applicant's conclusion in relation to the Proposed Development rather than a general principle in respect of potential transboundary effects.	Given that the geographical footprint of onshore construction impacts from this project are highly localised (see Chapters 18 – 27) and that there are no emissions such as gases or waste fluids associated with operation which could cause indirect far-field impact there is no pathway for transboundary effects from the onshore elements.
The Planning Inspectorate	20/12/2017 Scoping Response	Regulation 32 of the EIA Regulations inter alia requires the Inspectorate to publicise a DCO application on behalf of the Secretary of State (SoS) if it is of the view that the proposal is likely to have significant effects on the environment of another EEA state, and where relevant, to consult with the EEA state affected.	Noted.

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The Planning Inspectorate	20/12/2017 Scoping Response	The Inspectorate considers that where Regulation 32 applies, this is likely to have implications for the examination of a DCO application. The Inspectorate notes that paragraph 178 of the Scoping Report states that transboundary impacts are to be considered on a 'topic by topic' basis. The ES should clearly assess whether the Proposed Development has the potential for significant transboundary effects and if so, what these are and which EEA States would be affected.	Transboundary impacts are discussed in detail in each relevant technical chapter.
The Planning Inspectorate	20/12/2017 Scoping Response	A reference list detailing the sources used for the descriptions and assessments must be included in the ES.	A reference list is provided at the end of each technical chapter.
The Planning Inspectorate	20/12/2017 Scoping Response	In some circumstances it will be appropriate for information to be kept confidential. In particular, this may relate to information about the presence and locations of rare or sensitive species such as badgers, rare birds and plants, where disturbance, damage, persecution or commercial exploitation may result from publication of the information. Where documents are intended to remain confidential the Applicant should provide these as separate paper and electronic documents with their confidential nature clearly indicated in the title, and watermarked as such on each page. The information should not be incorporated within other documents that are intended for publication or which the Inspectorate would be required to disclose under the Environmental Information Regulations 2014.	Noted, any confidential information will be clearly labelled as such.
Natural England (NE)	08/12/2017 Scoping Response	In accordance with the 2017 Habitats Regulations 63 (2) and 2017 Offshore Habitat Regulations anyone applying for development consent for an Nationally Significant Infrastructure Project (NSIP) must provide the competent authority with such information as may reasonably be required "for the purposes of the assessment" or "to enable them to determine whether an appropriate assessment is required". NE advises	Information to Support Appropriate Assessment Report (document reference 5.3) has been submitted as part of the DCO application, this has been updated based upon comments received during section 42 consultation.

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		that this information should therefore be provided and appraised as part of the Preliminary Environmental Information (PEI) process.	
Royal Society of the Protection of Birds (RSPB)	20/12/2017 Scoping Response	We are therefore grateful for the constructive pre-application discussions with ScottishPower Renewables so far, and will continue discussions with a view to resolving any concerns, and ensuring that robust evidence is submitted so that the potential environmental impacts can be properly understood and evaluated.	Noted.
Natural England	08/12/2017 Scoping Response	We note that the information and detail provided is limited and is focussed on the high-level of aims of the PEI. We would welcome further information pertaining to the specific survey methodologies to be adopted for assessment of impacts on each receptor and for a preliminary assessment of key potential impacts associated with the development and in-combination with other plans/projects.	Technical chapters present relevant survey methodologies in detail, alongside assessment of impacts and cumulative impacts. All surveys methodologies have been discussed and agreed with stakeholders through the Evidence Plan Process (EPP).
Natural England	08/12/2017 Scoping Response	It is the view of Natural England that the most appropriate form for a PEI to adopt is that of a draft Environmental Statement (ES). This would reassure Natural England and other key stakeholders, that the Applicant's approach to EIA is appropriate and to allow time for areas of concern to be raised and resolved prior to submission of the final ES to the Planning Inspectorate. It is, therefore, sensible to maximise the opportunities in pre-application for open and constructive dialogue, to reduce the risk of an application being rejected by the Planning Inspectorate. It is also our experience that if too many issues are left unresolved at application then this causes increased pressure for all involved during the Examination process. As such we would expect emphasis on effective pre-application engagement between the developer and Natural England and the PEI to present sufficient detail such that an assessment of the Applicant's approach to EIA can be	Noted. The PEIR took the form of a draft ES and the Applicant continues to use the ETGs as a mechanism to engage with stakeholders during the pre-application stage.

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		identified. Timeframes post PEI should also allow sufficient time to resolve any issues raised during the process; noting that 6 months is proving to be insufficient where there are complex and contentious issues still to be resolved.	
The Planning Inspectorate	25/01/2018 Planning Inspectorate Meeting	<p>The Applicant enquired whether their understanding was correct and matters that it had not been agreed in the Scoping Opinion could be scoped out from the EIA with relevant consultee agreement and through justification in the ES.</p> <p>The Inspectorate confirmed that this was the correct interpretation of the Regulations and the advisable course of action would involve providing an explicit agreement log presenting all matter that had been scoped out. The agreements could be reached through the ETG process, documenting consultees' opinions, and providing detailed reasoning within the Preliminary Environmental Information report and later in the Environmental Statement.</p>	Topics which have been scoped out are detailed in each relevant technical chapter.
The following comments were made in response to the PEIR and were taken into account in the production of this ES			
National Grid Ventures	14/03/2019 Section 42 Response	<p>Nautilus and Eurolink Interconnector Projects</p> <p>The Eurolink Project is a proposed Interconnector between the Netherlands and Suffolk and is the more immature of the two. The Nautilus Interconnector is a proposed 1400 MW high voltage direct current (HVDC) electricity link between the British and Belgium transmission systems connecting between a substation in Suffolk and a substation in Belgium.</p> <p>Both the Nautilus and Eurolink projects are at an early stage of development. We are currently assessing different options for delivery and plan to undertake public consultation once these options have been</p>	Noted, this has been taken account of in section 5.7 in this chapter.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		<p>explored and we have a sufficient amount of detail to present to the public and stakeholders.</p> <p>It is acknowledged that at this early stage in our project, we are unable to provide ScottishPower Renewables (SPR) with a detailed description, proposed route and environmental information which</p> <p>could be used to consider cumulative impact as part of your proposals. However, National Grid Ventures (NGV) will continue to engage with SPR throughout the development of our projects</p>	
National Trust	21/03/2019 Section 42 Response	It is recognised that the “Rochdale Envelope” approach will be adopted where the detail of certain aspects will not be determined in detail but within controlled parameters to allow for flexibility. However, it is very difficult to comment on a number of aspects of the proposal which the National Trust are concerned about when important issues such as the number of wind turbines, the layout configuration, type of foundations for the turbines, dredging for cable laying have not yet been determined and further assessments need to be carried out.	Since submitting the PEIR various updates to the project design have been made as detailed in Chapter 6 Project Description , and topic specific chapters and assessment have been updated in this ES (chapters 7–30).
National Trust	21/03/2019 Section 42 Response	It is important that the public has sight of all detailed assessments in order to fully consider matters of concern. It must also be ensured the mitigation hierarchy (avoid, mitigate, compensate) is followed, and residual impacts are compensated for, and that such compensation is secured through a legal agreement. The Trust would welcome discussions with SPR on matters where it considers there would be residual effects on the seascape and the Area of Natural Beauty (AONB). Post consent monitoring plans should also be developed which should include triggers for action and funding to deliver those actions.	The PEIR took the form of a draft ES and has been made available online, at public information events and local libraries for members of the public to view and provide comments. The approach to considering mitigation is presented in section 5.6.7 in this chapter and discussed in each technical chapter where relevant (chapters 7-30).

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