



SCOTTISHPOWER
RENEWABLES

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicant's Comments on Relevant Representations Volume 1: Introduction

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



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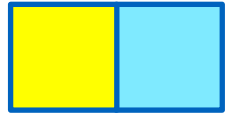


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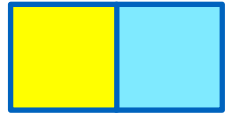


Glossary of Acronyms

| | |
|---------|--|
| ABP | Associated British Ports |
| ACoW | Arboricultural Clerk of Works |
| AEoI | Adverse Effect on Integrity |
| AIL | Abnormal Indivisible Loads |
| AIS | Air Insultaed Swithgear |
| AOD | Above Ordnance Datum |
| AONB | Area of Outstanding Natural Beauty |
| APP | Application Document |
| AQMA | Air Quality Management Area |
| AQMP | Air Quality Management Plan |
| AR | Avoidance Rate |
| BBPP | Breeding Bird Protection Plan |
| BCT | Bat Conservation Trust |
| BDMPS | Biologically Defined Minimum Population Sizes |
| BEIS | Department for Business, Energy & Industrial Strategy |
| CCS | Construction Consolidation Sites |
| CfD | Contract for Difference |
| CFWG | Commercial Fisheries Working Group |
| CIA | Cumulative Impact Assessment |
| CION | Connection and Infrastructure Options Note |
| CLO | Community Liaison Officer |
| CoCP | Code of Construction Practice |
| COLREGS | International Convention for the Prevention of Collision at Sea |
| CMS | Construction Method Statement |
| CRM | Collision Risk Model |
| CTMP | Construction Traffic Management Plan |
| DCO | Development Consent Order |
| DECC | Department of Energy and Climate Change |
| DEFRA | Department for Food Agriculture and Rural Development |
| DEPONS | Disturbance Effects of Noise on the Harbour Porpoise Population in the North Sea |
| DML | Deemed Marine Licence |
| DMO | Destination Mangement Organisation |
| EC | European Commission |
| Ecia | Ecological Impact Assessment |
| ECoW | Ecological Clerk of Works |
| EDR | Effective Deterrent Range |
| EIA | Environmental Impact Assessment |
| EMF | Electromagnetic Fields |
| EMP | Ecological Management Plan |
| EPP | Evidence Plan Process |
| EPS | European Protected Species |
| ERCOP | Emergency Response Cooperation Pla |
| ES | Environmental Statement |
| ESC | East Suffolk Council |
| ETG | Expert Topic Group |
| ExA | Examining Authority |
| FFC | Flamborough & Filey Coast |
| FLCP | Fisheries Liaison and Co-existence Plan |
| FLO | Fisheries Liaison Officer |
| FLOWW | Fishing Liaison with Offshore Wind and Wet Renewables Group |
| FRA | Flood Roisk Assessment |
| FTE | Full Time Equivalent |



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| GEART | Guidelines for the Environmental Assessment of Road Traffic |
| GIS | Gas Insulated Switchgear |
| GPS | Global Positioning Satellite |
| HDD | Horizontal Directional Drill |
| HE | Historic England |
| HGV | Heavy Goods Vehicle |
| HLC | Historic Landscape Characterisation |
| HRA | Habitats Regulation Assessment |
| IALA | International Association of Lighthouse Authorities |
| IAQM | Institute of Air Quality Management |
| ICNRR | International Commission on Non-ionizing Radiation Protection |
| IEMA | Institute of Environmental Management and Assessment |
| IHLS | International Herring Larvae Survey |
| ILE | Institute of Lighting Engineers |
| IOF | Important Ornithological Features |
| IP | Interested Party |
| LCT | Landscape Character Type |
| LCV | Light Commercial Vehicle |
| LGV | Light Goods Vehicles |
| LLFA | Lead Local Flood Authority |
| LMP | Landscape Management Plan |
| LVIA | Landscape and Visual Impact Assessment |
| MCA | Martirime and Coastguard Agency |
| MCLG | Ministry of Housing, Communities & Local Government |
| MGN | Marine Guidance Note |
| MHWS | Mean High Water Springs |
| MMMP | Marine Mammal Mitigation Protocol |
| MMO | Marine Management Organisation |
| MOD | Ministry of Defence |
| MoU | Memorandum of Understanding |
| MPA | Marine Protected Area |
| MSFD | Marine Strategy Framework Directive |
| MSS | Marine Scotland Science |
| NALEP | New Anglia Local Enterprise Partnership |
| NATS | National Air Traffic Service |
| NE | Natrual England |
| NFFO | National Federation of Fishermen's Organisation |
| NGET | National Grid Electricity Transmission |
| NNR | National Nature Reserve |
| NO ₂ | Nitrous Oxide |
| NPPF | National Planning Policy Framework |
| NPS | National Policy Statement |
| NRA | Navigational Risk Assessment |
| NSIP | Nationally Significant Infrastructure Project |
| NtM | Notices to Mariners |
| OFTO | Offshore Transmission Owner |
| OLEMS | Outline Landscape and Ecological Management Strategy |
| OLMP | Outline Landscape Management Plan |
| ONR | Office for Nuclear Regulation |
| OREI | Offshore Renewable Energy Installation |
| ORJIP | Offshore Renewables Joint Industry Programme |
| OTP | Outline Travel Plan |
| OWSI | Outline Written Scheme of Investigation |
| OWSMF | Offshore Wind Strategic Monitoring Forum |
| PEIR | Preliminary Environmental Information Report |
| PHE | Public Health England |



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| PIDs | Public Information Days |
| PPG | Planning Practice Guidance |
| PRoW | Public Rights of Way |
| PRoWS | Public Rights of Way Strategy |
| PSA | Particle Size Analysis |
| RAG | Red Amber Green |
| REPPIR | Radiation (Emergency Preparedness and Public Information) Regulations |
| RoC | Review of Consents |
| RPG | Registered Parks and Gardens |
| RSPB | Royal Society for the Protection of Birds |
| RYA | Royal Yachting Association |
| SAC | Special Area of Conservation |
| SCC | Suffolk County Council |
| SCCAS | Suffolk County Council Archaeology Service |
| SEA | Strategic Environmental Assessment |
| SEL | Sound Exposure Level |
| SIP | Site Integrity Plan |
| SLVIA | Seascape, Landscape and Visual Amenity |
| SNH | Scottish Natural Heritage |
| SNS | Southern North Sea |
| SoCC | Statement of Community Consultation |
| SoCG | Statement of Common Ground |
| SOLAS | International Convention for the Safety of Life at Sea |
| SoS | Secretary of State |
| SPA | Special Protected Area |
| SPL | Sound Pressure Level |
| SPR | ScottishPower Renewables |
| SSC | Suspended Sediment Concentrations |
| SSSI | Site of Special Scientific Interest |
| STEM | Science, Technology, Engineering, and Mathematics |
| SuDS | Sustainable Drainage System |
| SZC | Sizewell C |
| TP | Travel Plan |
| TWT | The Wildlife Trust |
| UXO | Unexploded Ordnance |
| WDC | Whale and Dolphin Conservation |
| WFD | Water Framework Directive |
| WSI | Written Scheme of Investigation |
| WTG | Wind Turbine Generator |
| ZTV | Zone of Theoretical Visibility |



Glossary of Terminology

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| Applicant | East Anglia TWO 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. |
| Construction consolidation sites | Compounds associated with the onshore works which may include elements such as hard standings, lay down and storage areas for construction materials and equipment, areas for vehicular parking, welfare facilities, wheel washing facilities, workshop facilities and temporary fencing or other means of enclosure. |
| Construction operation and maintenance platform | A fixed offshore structure required for construction, operation, and maintenance personnel and activities. |
| Development area | The area comprising the onshore development area and the offshore development area (described as the 'order limits' within the Development Consent Order). |
| 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 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. |



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| Jointing bay | Underground structures constructed at intervals along the onshore cable route to join sections of cable and facilitate installation of the cables into the buried ducts. |
| Landfall | The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables. |
| Link boxes | Underground chambers within the onshore cable route housing electrical earthing links. |
| Meteorological mast | An offshore structure which contains metrological instruments used for wind data acquisition. |
| Mitigation areas | Areas captured within the onshore development area specifically for mitigating expected or anticipated impacts. |
| 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. |
| National electricity grid | The high voltage electricity transmission network in England and Wales owned and maintained by National Grid Electricity Transmission |
| 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 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 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 project Development Consent Order. |
| National Grid substation location | The proposed location of the National Grid substation. |
| Natura 2000 site | A site forming part of the network of sites made up of Special Areas of Conservation and Special Protection Areas designated respectively under the Habitats Directive and Birds Directive. |
| 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 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. |



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| 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. |
| 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 project from landfall to the connection to the national electricity grid. |
| Onshore preparation works | Activities to be undertaken prior to formal commencement of onshore construction such as pre-planting of landscaping works, archaeological investigations, environmental and engineering surveys, diversion and laying of services, and highway alterations. |
| Onshore substation | The East Anglia TWO substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure. |
| Onshore substation location | The proposed location of the onshore substation for the proposed East Anglia TWO project. |
| 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. |
| Transition bay | Underground structures at the landfall that house the joints between the offshore export cables and the onshore cables. |
| Transmission DML | The deemed marine licence in respect of the transmission assets set out within Schedule 14 of the draft DCO. |



1 Introduction

1.1 East Anglia TWO

1. A total of 835 Relevant Representations were received by the Planning Inspectorate with respect to the East Anglia TWO project ('the Project') during the statutory consultation period under Section 56 of the Planning Act 2008.
2. The 835 Relevant Representations comprise of the following:
 - 770 from members of the public / businesses;
 - 4 from local authorities;
 - 13 from parish councils;
 - 25 from statutory consultees; and
 - 23 from non-statutory organisations.

1.2 East Anglia ONE North

3. A total of 880 Relevant Representations were received by the Planning Inspectorate with respect to the East Anglia ONE North project during the statutory consultation period under Section 56 of the Planning Act 2008.
4. The 880 Relevant Representations comprise of the following:
 - 818 from members of the public / businesses;
 - 5 from local authorities;
 - 12 from parish councils;
 - 23 from statutory consultees; and
 - 22 from non-statutory organisations.

1.3 Purpose of this Document

5. The Examining Authority (ExA) allocated a reference number to each interested party (IP) that submitted a Relevant Representation. All Relevant Representations can also be found in the Project Examination Library on the Planning Inspectorate website¹. The Project application documents that have been referred to throughout this document can also be found at the below link. The Planning Inspectorate library reference numbers given to each of the application documents have been used throughout this document for ease of reference.

¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-001676-East%20Anglia%20Two%20Examination%20Library.pdf>



6. The Planning Inspectorate classified each Relevant Representation into the five categories outlined above. The Applicant notes that some IPs have been allocated the incorrect category, for example a Town Council categorised as a local authority, or a non-statutory organisation classified as a member of the public / business. Where this has occurred, the Applicant has amended the category appropriately when providing comments.
7. The level of detail in Relevant Representation submissions differs between IPs. Some representations provide extensive and detailed comments, other representations comprise short statements outlining why a given party has an interest in the examination process. At this stage, the Applicant has therefore responded proportionally to the level of detail in each representation.
8. Relevant Representations received in respect of the for both East Anglia TWO and East Anglia ONE North projects ('the Projects') from members of the public / businesses have been grouped by topic in order to avoid unnecessary repetition in responses. The Applicant has responded in detail to IPs which have been identified as local authorities, parish councils, statutory consultees, non-statutory organisations and landowners. The Applicant's comments on Relevant Representations received from IPs for the Project have been separated into separate Volumes:
 - **Volume 1: Introduction** (this document);
 - **Volume 2: Individual Stakeholders** (document reference ExA.RR2.D0.V1);
 - **Volume 3: Technical Stakeholders** (document reference ExA.RR3.D0.V1);
 - **Volume 4: Landowners** (document reference ExA.RR4.D0.V1).
9. In accordance with the ExA's procedural decisions on document management of 23rd December 2019, this document is applicable to both the East Anglia ONE North and East Anglia TWO Applications (with the exception of the Glossary of Terminology and Introduction and the specific sections listed in **paragraphs 11** and **12** below). It is therefore largely endorsed with the yellow and blue icon used to identify materially identical documentation. Where a section differs between the two Projects, the coloured box in the headers and the colour of the section headings will reflect this as well as text in the footers.
10. It should be noted that some members of the public / businesses only submitted Relevant Representations for one project, however, to ensure all Relevant Representations were considered by the Applicant these representations have been considered with regard to both Projects.



11. Five topics have comments on Relevant Representations which vary between the Projects and therefore the coloured box in the headers and the colour of the section headings reflects this. These are:
- Commercial Fisheries (**Volume 2, section 2.2**);
 - General Offshore Comments (**Volume 2, section 2.8**);
 - Policy and Legislation (**Volume 2, section 2.20**);
 - Seascape (**Volume 2, section 2.27**); and
 - Tourism and Hospitality (**Volume 2, section 2.30**)
12. In addition, as noted in **Volumes 3** and **4**, Relevant Representations submitted by the following IPs differed between the Projects and therefore the coloured box in the headers and the colour of the section headings reflects this:
- East Anglia ONE North Limited (**Volume 3, section 4.4**);
 - Eastern Inshore Fisheries Conservation Authority (**Volume 3, section 4.6**);
 - Iken Parish Council (**Volume 3, section 3.6**);
 - Marine Management Organisation (**Volume 3, section 4.12**);
 - National Air Traffic Service (**Volume 3, section 4.15**);
 - Natural England (**Volume 3, section 4.18**);
 - Rijkswaterstaat (**Volume 3, section 5.5**);
 - Barbara Jeffries (**Volume 4, section 2.3**);
 - Elizabeth Everett (**Volume 4, section 2.5**);
 - Jonathan Franklin (**Volume 4, section 2.8**);
 - Theresa Tollemache (**Volume 4, section 2.26**); and
 - William Gault (**Volume 4, section 2.27**).