

**SCOTTISHPOWER  
RENEWABLES**

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

## **Applicants' Comments on Snape Parish Council's Deadline 8 Submissions**

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



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## Glossary of Acronyms

DCO	Development Consent Order
DfT	Department for Transport
PD	Procedural Decision
SCC	Suffolk County Council
SEAS	Suffolk Energy Action Solutions



## Glossary of Terminology

Applicant	East Anglia TWO Limited / East Anglia ONE North Limited
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia ONE North windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
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.



# 1 Introduction

1. This document presents the Applicants' comments on Snape Parish Council's Written Representation submitted at Deadline 8 (Ref 20023749/50) in relation to transport matters (REP8-216).
2. This document is applicable to both the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23<sup>rd</sup> December 2019 (PD-004). Whilst this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it for the other project submission.



## 2 Comments on Snape Parish Council's Deadline 8 Submissions

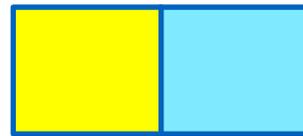
ID	Snape Parish Council Comment	Applicants' Comments
<b>Transport</b>		
1	<p>At the hearing reference was made to a report which we understand was submitted prior to that hearing by Dr Trapp based on an analysis of traffic data from the Snape Speed Indicator Devices (SIDS) which were constructed on the A1094 with funding from the village. That data was provided to Dr Trapp (via SEAS) by Snape PC. The data and analysis reinforces the points that Snape has raised consistently in the consultations and representations. It reflects clearly that for periods of time road use of the A1094 is at or near capacity, and the substantial additional traffic movements of all types will have a very significant detrimental impact along the A1094. That weight of traffic will also then impact on the junction with the B1069 and back into the village a point we have repeatedly made is recognised by Dr Trapp and an issue that has not been addressed by SPR at any point. As previously noted in our submissions at peak periods the queues of traffic along Church Road (B1069) to travel north onto the A1094 can extend to a mile in distance with hundreds of cars. The additional construction traffic on the A1094 can only increase this congestion. The PC notes that the detailed analysis of the potential impact of traffic over peak periods such as holidays or the frequent and long established cultural events at both Snape and Aldeburgh is reflected by Dr Trapp, again an issue we have consistently raised. In the hearing on the 12<sup>th</sup> March the applicants simply continued to rely on average traffic data. As previously noted the analysis and</p>	<p>The Applicants note that Snape Parish Council's comments refer to Suffolk Energy Action Solutions (SEAS) Deadline 5 Representation on Roads / Traffic and Tourism (REP5-113). The Applicants responded this report submitted by SEAS within <b>Section 2.4</b> of the <b>Applicants' Comments on SEAS Deadline 5 Submissions</b> (REP6-032) and refer Snape Parish Council to the responses set out within that document.</p> <p>The Applicants reiterate that baseline traffic conditions were agreed with Suffolk County Council (SCC) and Highways England during pre-application scoping and have been agreed within the respective SoCGs (REP8-114 and REP8-117). The traffic modelling was undertaken in accordance with current Department for Transport (DfT) Transport Assessment Guidance which directs that the assessment should be based on normal conditions (i.e. not during school holidays) and is in keeping with highway network management practice across the UK. This was confirmed by SCC during their oral submissions at Issue Specific Hearing 4.</p> <p>With regard to highway network resilience, the Statement of Common Ground with the Councils submitted at Deadline 8 (REP8-114), confirms the Councils' agreement with the Applicants' cumulative assessment outcomes (no residual impacts following mitigation) and agreement that provisions are in place to protect the highway asset during the construction phase of the Projects.</p> <p>The current protocols for reporting road traffic collisions (utilising STATS 19 data) was established by the DfT and the Police in 1979 and have been subject</p>



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	<p>calculations in Chapter 26 of the DCO were based on average traffic movements, which given the nature of traffic in the area, ignore the GEART guidance of making calculations based on "site specific" information and circumstances. The PC also noted the continuing assumption by SPR through the hearing that the A1094 was wide enough at all points between the A12 and the eastern edge of the village, to allow passing HGVs that was based entirely on the route being a designated HGV route without any supporting analysis. We make the point that the designation, of that and other roads, as HGV routes in Suffolk reflects necessity rather than them being appropriate. In the hearing itself when Mr Merry the SCC transport expert was pressed by the Inspectors on the road infrastructure capability and fragility he was clear that the A1094 was "the least worst option", and also reflected that it may well not have the resilience to cope with the other linked projects if they proceed. The PC noted that there was continued reference in the hearing to falling numbers of road traffic collisions since 2013 without reflecting that all recording is dependent on police reporting and attendance and they only attend reported collisions where there has been an injury as policy; even that is contingent on availability. Police numbers both nationally and locally have fallen significantly since 2012 onwards. This is a point again we have raised previously which SPR continues to appear to ignore.</p>	<p>to a number of refinements in the subsequent years to improve the accuracy of reporting. This data is utilised by all the highway authorities in the UK to discharge their duties under The Road Traffic Regulation Act 1988 to [paraphrasing] in light of studies into accidents take measures as appear to the authority to be appropriate to prevent accidents.</p> <p>The DfT produces a comprehensive annual report<sup>1</sup> which gives an overview and commentary of reported road casualties in the UK, examining trends over the life of STATS 19. There is nothing in the DfT annual reports to suggest there has been a downward trend in reported accidents that can be linked to Police resource. On the contrary, the annual report notes innovations in reporting technology post 2016 have improved the accuracy and consistency of collision reporting.</p> <p>The annual report examines the coherence of STATS 19 data and concludes: "<i>...police data on road accidents, whilst not perfect, remain the most detailed, complete and reliable single source of information on road casualties covering the whole of Great Britain, in particular for monitoring trends over time, and remains well regarded in international comparisons.</i>"</p>
2	<p>Appended Report: SEAS Representation on Roads / Traffic and Tourism</p>	<p>The Applicants note that the report appended to Snape Parish Council's Written Representation submitted at Deadline 8 regarding roads, traffic and tourism was</p>

<sup>1</sup> Reported road casualties in Great Britain: 2019 annual report, DfT, September 2020

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/922717/reported-road-casualties-annual-report-2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/922717/reported-road-casualties-annual-report-2019.pdf)



ID	Snape Parish Council Comment	Applicants' Comments
		prepared by Cllr John Trapp and submitted by SEAS at Deadline 5 (REP5-113). The Applicants provided a response to SEAS Deadline 5 submissions at Deadline 6 and would refer to <b>Section 2.4</b> of the <b>Applicants' Comments on SEAS' Deadline 5 Submissions</b> (REP6-032) and <b>Section 2.3</b> of the <b>Applicants' Comments on SEAS Deadline 8 Submissions</b> (document reference ExA.AS-10.D9.V1).