



**SCOTTISHPOWER
RENEWABLES**

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on Save Our Sandlings' Deadline 9 Submissions

Applicant: East Anglia TWO and East Anglia ONE North Limited

Document Reference: ExA.AS-12.D10.V1

SPR Reference: EA1N_EA2-DEF-ENV-REP-IBR-001062

Date: 6th May 2021

Revision: Version 01

Author: Royal HaskoningDHV

Applicable to East Anglia ONE North and East Anglia TWO



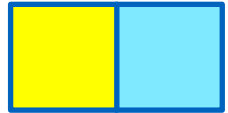
Revision Summary				
Rev	Date	Prepared by	Checked by	Approved by
01	06/05/2021	Paolo Pizzolla	Lesley Jamieson / Ian Mackay	Rich Morris

Description of Revisions			
Rev	Page	Section	Description
01	n/a	n/a	Final for Submission



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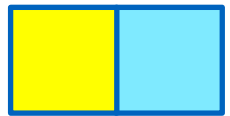
Glossary of Acronyms

CoCP	Code of Construction Practice
DCO	Development Consent Order
ECoW	Ecological Clerk of Works
EMP	Ecological Management Plan
HDD	Horizontal Directional Drilling
IAQM	Institute of Air Quality Management
OLEMS	Outline Landscape and Ecological Management Strategy
SoS	Save Our Sandlings



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.
Horizontal directional drilling (HDD)	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
Onshore cable corridor	The corridor within which the onshore cable route will be located.
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.



1 Introduction

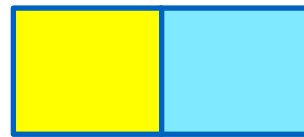
1. This document presents the Applicants' comments on Save Our Sandlings' (SoS) Deadline 9 submission **Response to REP8-017 Outline Code of Construction Practice** (REP9-073).
2. This document is applicable to both the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications, 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 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 Comments on Save our Sandlings' Deadline 9 Submissions

2.1 Response to REP8-017 Outline Code of Construction Practice (REP9-073)

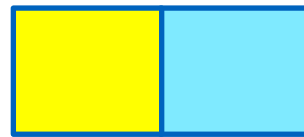
ID	SoS Comment	Applicants' Comments
Chapter 2		
<i>Section 2.6 Local Community Liaison</i>		
1	Local Liaison Officer. Where will the officer be based? They need to be site based and contactable on each and every working day. Operating from a remote location cannot offer acceptable and timely solutions to community concerns.	<p>The Applicants note that 'Local Liaison Officer' is not a term they use, but assume that SoS is referring to the community liaison officer.</p> <p>It is anticipated that the community liaison officer would be based in the locality of the Projects, as was the case for the East Anglia ONE project. The success of the East Anglia ONE project's community liaison officer was, in part, due to this local presence.</p>
2	Providing information directly to Town and Parish Councils and via information boards should be only part of the communication strategy. We suggest a closed Facebook group or similar that accepted representatives may join to view regular project updates, to comment and post questions and raise issues. This will be in addition to direct contact details. This should be supported by regular update meetings either face to face or via video call with an agreed business and resident liaison committee.	<p>The Applicants note that one of the provisions within Section 2.6 of the Outline Code of Construction Practice (CoCP) (document reference 8.1) reads as follows:</p> <ul style="list-style-type: none"> Keeping local residents informed through a combination of communication channels, for example information boards and parish council meetings. <p>It is clear, therefore, that the use of information boards is only an example of the type of channels that would be used.</p> <p>As outlined in the Onshore Site Investigation Works Update Note (document reference ExA.AS-9.D10.V1), the Applicants will maintain a dedicated website (or webpage) to provide weekly lookaheads as the construction works progress. The website (or webpage) will include the addition of a "targeted subscription option" where individuals can register to receive detailed updates on the</p>



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		<p>construction works. In this way, the same information is available to all members of the community, and community representatives, at once.</p> <p>The community liaison officer will be the single point of contact for communications, thereby ensuring continuity of contact.</p> <p>The community liaison officer will be available to meet members of the community. The Outline CoCP (document reference 8.1) sets out further measures that will be employed by the Applicants to promote effective communication with the local communities, including:</p> <ul style="list-style-type: none"> • Production of a stakeholder communication plan and its approval by the relevant planning authority (secured by Requirement 22 of the draft DCO (document reference 3.1)); • Provision of regular project updates; • Home visits; • Pre-enabling Drop-In Events; • Construction Commencement Events; • Construction Events; • Parish Council Meetings; • Horizontal Directional Drilling (HDD) Public Information Days; and • Archaeology Roadshows.
3	<p>We are experiencing issues with the pre-construction survey contractors as we write. Contractors have been working along the onshore cable route for 2 weeks and a number of issues have been raised. Contact details of the site manager have been requested and as yet these have not been provided. All communications are via the applicants Community Liaison Officer based remotely in Norfolk some 40 – 50 miles from site. We consider this</p>	<p>The Applicants note that the ground investigation works undertaken recently fall outside of the Development Consent Order (DCO) as a decision on the Applications has not yet been made by the Secretary of State.</p> <p>Details of these investigation works are presented within the Onshore Site Investigation Works Update Note (document reference ExA.AS-9.D10.V1).</p>



ID	SoS Comment	Applicants' Comments
	<p>unacceptable as delays in responding to issues and concerns are being experienced. This is a foretaste of what is to come and we do not consider this a satisfactory state of affairs.</p>	<p>Contact details of the site manager or any other employee will not be shared, rather the Applicants' Stakeholder Management team are the single point of contact for these Onshore Site Investigation Works. This is distinct from the community liaison officer who will be appointed for the construction phase of the Projects and will be based in the locality.</p>
4	<p>Whilst many residents are unhappy with any industrial development of land within and adjacent to an Area of Outstanding Natural Beauty containing Sites of Special Scientific Interest, Environmentally Sensitive Areas, Environmentally Protected Areas, Special Protected Areas and an area noted for its remoteness and serenity, they will not actively prevent legally consented works taking place as long as they know what is being proposed and likely timescales. What causes aggravation and leads to increased tension and anxiety is a lack of meaningful information and well-timed consultation.</p>	<p>The measures set out in the Outline CoCP (document reference 8.1), supplemented by the dedicated website (or webpage) as outlined in the Onshore Site Investigation Works Update Note (document reference ExA.AS-9.D10.V1) seek to ensure that residents and the community are kept updated of information about the Projects in order to avoid causing aggravation or anxiety.</p>
5	<p>Where works are to take place, more precise information as to the potential disruption to their everyday lives is essential. Recently, the unloading of a large excavator disrupted residents and businesses for some time leading to a missed doctor's appointment and a waste tanker from leaving the local caravan site and subsequently being late for their next appointment. A little forward planning in this instance, informing local residents and businesses of the potential disruption to the start of their day would have allowed alternative plans to implemented thereby avoiding unnecessary delays.</p>	<p>Details of these investigation works, including the Applicants' response to the points raised regarding the use of Sizewell Hall Road, are presented in the Onshore Site Investigation Works Update Note (document reference ExA.AS-9.D10.V1).</p>
6	<p>Following an email complaint we received this response: <i>"On discussion with our Contractor the low loader had stopped for a short period (30 min – inserted) to unload the excavator as track</i></p>	<p>Details of these investigation works, including the Applicants' response to the points raised regarding the use of Sizewell Hall Road, are presented in the</p>



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	<p><i>conditions were deemed to be unsuitable for the excavator to continue along Sizewell Hall Road to its intended destination. We accept that some disruption was caused during these activities for this short time. Please pass on our apologies to those involved for any inconvenience.</i></p> <p><i>The offloading of machinery is a periodic operation, these activities will take place at the start and completion of the ground investigation works to deploy and remove the machinery.”</i></p> <p>The above response is incorrect as the excavator was unloaded at the Sizewell Hall – Beach View junction as the track was unsuitable for the low loader; the excavator then travelled the half mile along the part metalled and part unmade track to the point of work. Some damage resulted to the road surface during this operation. The previous day, an excavator was unloaded in Sizewell Gap Road, potentially a far more hazardous situation and then travelled to the same point of work along Sizewell Hall Road. We have to ask the question why the unsuitability of the track for a low-loader was not recognised on the first day and local businesses and residents not given advance warning of potential delay and disruption as a result of the alternative unloading point. This shows a complete disregard for anyone other than the contractor own self interest.</p>	<p>Onshore Site Investigation Works Update Note (document reference ExA.AS-9.D10.V1).</p>
7	<p>We are quite prepared to accommodate contractor's requests as long as acceptable periods of notice are given.</p>	<p>As outlined in the Onshore Site Investigation Works Update Note (document reference ExA.AS-9.D10.V1), a targeted community engagement programme will be undertaken during the construction works, involving the use of a dedicated website (or webpage) to provide regular lookaheads as the construction works progress. The website (or webpage) will also include the addition of a subscription option where individuals can register to receive detailed updates on the construction works. The existing database held by the</p>



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		<p>Applicants (established during the pre-application stage of the Applications) will continue to be utilised to provide more general project updates.</p> <p>The measures set out in the Outline CoCP (document reference 8.1), including a dedicated website (or webpage) providing updates and regular lookaheads as the construction works progress will ensure suitable notification is given to the local community during the construction works.</p>
8	<p>Our most serious concern resulting from the complete blocking of Sizewell Hall Road is this is the main emergency escape route for residents and visitors to Beach View Holiday Park, Sizewell Hall, The Dower House and Wardens in the event a site nuclear emergency is declared by EdF at Sizewell B. Blocking or restricting access and egress on this road must never occur at any time and must always allow free passage. This issue was reported to the control room staff at Sizewell B as incidents of this nature need to be logged in order appropriate action can to be taken in the event a site emergency is declared and immediate area evacuation is deemed necessary. This is a most serious breach of safety protocols and caused increased anxiety and stress for residents.</p>	<p>The Applicants refute the accusation that safety was put at risk. No hinderance to residents would have occurred in the event of a nuclear emergency at Sizewell B as the Sizewell Hall Road would have been cleared of plant and vehicle within minutes, allowing free passage. It is noted that the Radiation Emergency Plan produced by the Suffolk Joint Emergency Planning Unit on behalf of Suffolk County Council/Suffolk Resilience Forum Evacuation, provides for an evacuation of the Detailed Emergency Planning Zone (generally within 4km of the Sizewell B reactor) within 10 to 12 hours of a radiation emergency being declared.</p>
9	<p>SPR acknowledged further in their reply to our email:</p> <p><i>"We are aware that this route is a primary evacuation route, as is our Contractor. This delay was unexpected and we do not intend for this issue to arise again."</i></p>	<p>Noted.</p>
10	<p>We would disagree with unexpected and say it was avoidable. Parties acting for SPR need to be very cognisant of the importance of this route; even in exceptional or 'unexpected' circumstances, was it correct restricting right of way on this road? Again an</p>	<p>The Applicants appreciate the importance of Sizewell Hall Road for the residents that it serves. Regard to access in and around Sizewell, including the properties accessed along Sizewell Hall Road, was had when preparing the Outline CoCP (document reference 8.1) and the Outline Sizewell Gap Construction Method Statement (REP8-086). The measures set out within</p>



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	<p>example of blatant disregard for the safety and wellbeing of others, putting themselves first. I remind the applicant of the 6 P's:</p> <p>Proper Prior Planning Prevents Poor Performance.</p> <p>Sadly the first 3 P's appear to have not turned up for work on this occasion.</p>	<p>those documents will be carried forward to the final plans and implemented accordingly during construction of the Projects.</p>
11	<p>All contractors must be aware of the issues of working in areas surrounding a nuclear power plant. Safety is everyone's responsibility. While nuclear safety in the UK has the highest priority and is world class, events may occur at any time of the day or night and we must be ever vigilant.</p>	<p>Please refer to the Applicants' Comment at ID8 above.</p> <p>The Applicants note that Requirement 33 of the draft DCO (document reference 3.1) ensures that no part of the relevant works undertaken post consent (being the onshore preparation works; the onshore works; and the offshore works to the extent that they are within the Sizewell B Detailed Emergency Planning Zone) shall commence until the Suffolk Resilience Forum Radiation Emergency Plan has been reviewed to account for the relevant works or part thereof and reissued in accordance with the relevant Radiation Emergency Preparedness Regulations.</p> <p>As noted in the Onshore Site Investigation Works Update Note (document reference ExA.AS-9.D10.V1), the Applicants engaged with the Suffolk Joint Emergency Planning Unit in November 2020 to discuss the pending onshore site investigation works. The Suffolk Joint Emergency Planning Unit subsequently confirmed that the onshore site investigation works would not require an update to the Suffolk Resilience Forum Radiation Emergency Plan.</p> <p>Nuclear safety is therefore at the forefront of the Applicants consideration and suitable measures are secured with the draft DCO (document reference 3.1).</p>
12	<p>Another Acronym contractors may find useful: STAR - Stop Think Act Review</p> <p>N.B Sizewell B will be starting a 5 week refuelling outage 16 April 2021 with 1500 additional contractors performing several thousand</p>	<p>The Applicants are aware of the Sizewell B outage and as noted in the Onshore Site Investigation Works Update Note (document reference ExA.AS-9.D10.V1), the Applicants have met with Sizewell B to discuss the onshore site</p>



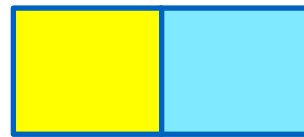
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	individual and inter-related tasks. Outages present the highest risk of an incident occurring as plant is maintained and serviced.	investigation works and refine the control measures to minimise interaction on Sizewell Gap and subsequently Sizewell B's operations.
Chapter 3		
<i>Section 3.1 Working Hours and Timing of Works</i>		
13	We are pleased to note though the working day is 7 am to 7 pm Monday to Friday and 7 am to 1pm Saturday, actual core hours will be limited to 8 am to 6 pm and 8 am to 1 pm respectively allowing an hour at the beginning and end of each day for start-up and close-down. We note also Saturday core working time does not allow a 1 hour for period close-down. We believe Saturday core working hours should read 8 am to 12 pm.	<p>The Applicants welcome SoS' comments on the clarification of the core working hours within the updated Outline CoCP (document reference 8.1).</p> <p>Given the already reduced working hours on Saturdays, the Applicants do not consider it necessary to curtail the core working hours further.</p>
14	We note the relevant planning authority will be required to approve any work outside of construction work hours with the exception of 'activity necessary in the instance of an emergency where there is a risk to persons, delivery of electricity or property ¹ ' Where emergency work is required notification to the relevant planning authority should be within 5 days. We believe this can be open to abuse by the applicant claiming work is an emergency and not subject to prior approval or consultation with affected parties. It is impossible for the planning authority to withhold approval if the work is already completed and community objections cannot carry any weight.	Suitable control mechanisms are included within the draft DCO (document reference 3.1) through the reporting of any out of hours emergency works. The Applicants would be in breach of the DCO if works are undertaken contrary to Requirement 23 or Requirement 24 of the draft DCO .
15	We would like an undertaking from the applicant that no work likely classified as essential to be start if there is any possibility this work will not complete during core working hours. In the event there is a prospect that required essential works are likely to overrun, we	Requirement 23 and Requirement 24 of the draft DCO (document reference 3.1) already sets out a process for the approval of essential works by the relevant planning authority. The works listed in Requirement 23(2)(a) to (d) and Requirement 24(2)(a) to (d), and any other works not listed, must be approved



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	expect and demand prior consultation with the affected community and businesses well in advance of these events to avoid unwarranted disruption to the peace and solitude of the area.	by the relevant planning authority in writing in advance, and must be carried out within the approved time. Save for an emergency, the Applicants do not have the ability to simply continue construction works beyond the approved construction hours without approval. Sufficient controls are therefore in place regarding the timing of essential works.
Chapter 8 Soil Management		
16	para 95 A pre-construction land survey would be undertaken by a qualified Agricultural Liaison Officer (ALO). Refer to comments above (Local Community Liaison). Experiences to date show poor liaison with the local community. Whilst the local community do not expect to be privy to the minutiae of day to day activities, it is imperative that works likely to affect everyday activities of the community are communicated efficiently and effectively providing sufficient notice for parties to make alternative arrangements if required. We have suggested methods of achieving these in our response Section 2.6 Local Community Liaison above	The Agricultural Liaison Officer is a specific role focused on landowner interaction and parties with rights over land, whilst the community liaison officer is responsible for providing information about the Projects to local communities. The Applicants consider that the measures set out within the Outline CoCP (document reference 8.1) secure an appropriate and tested approach to keeping local communities informed about construction activities which may affect certain aspects of day to day lives.
17	It is important to remember the Sandlings area in particular, is within an AONB, containing SSSI, ESA, EPA and SPA , and these works will take place in an area much loved and fiercely protected from activities likely to degrade the current environmental status. Businesses, residents and visitors rely on the whole area for income, leisure, peace and tranquillity. This especially true in the areas surrounding Wardens adjacent to Work area 9 (Plot 13). We note a very late alteration to order limits for Plot 13 announced 1 day before Deadline 9.	No response required.
Chapter 10 Air Quality Management		



ID	SoS Comment	Applicants' Comments
<i>Section 10.1.2 Dust Management</i>		
18	<p>The Sandlings area comprises very fine sand particulate and is extremely prone to wind-whipping and becoming airborne with the passage of traffic. Limiting the speed of traffic to 10 mph 'on unsurfaced, haul roads and work areas will be signposted and imposed' will be insufficient to prevent sand particles forming dust clouds behind vehicles and will be an issue especially on PRoW used daily by the local community and visitors.</p>	<p>The Applicants note SoS' representations regarding the susceptibility of the sandy ground to wind-whipping. However, it is considered that the imposition of a speed limit of 10mph within 100m of sensitive receptors (i.e. properties) and 15mph outside of these areas (but within the Order limits) is appropriate. It is also noted that the temporary haul road would comprise imported material to create a purpose-built temporary surface for construction vehicles to navigate along the onshore cable corridor. As such, vehicles travelling along the haul road would not be driving on the sandy ground referred to by SoS.</p> <p>The following provision within Institute of Air Quality Management (IAQM) guidance (2014) was borne in mind when making the commitment to reduced vehicle speed limits along the haul road in sensitive areas:</p> <ul style="list-style-type: none"> <i>Impose and signpost a maximum-speed-limit of 15 mph on surfaced and 10 mph on unsurfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate).</i> <p>The Applicants therefore consider their commitment goes beyond the relevant industry guidance. Put into wider context, the commitment to a reduced haul road speed limit within sensitive areas forms only one of a suite of measures set out within Section 10.1.2 of the Outline CoCP (document reference 8.1) proposed to manage dust and maintain suspended particles to suitable levels.</p>
19	<p>It has been noted the current pre-construction survey personnel do not always observe these limits.</p>	<p>The Applicants note that there are no temporary haul roads yet in place – these will be installed during the construction period and removed following completion of the relevant works and the land reinstated.</p>



ID	SoS Comment	Applicants' Comments
		During the construction phase, contractors will be contractually obliged to adhere to the relevant provisions set out within the final CoCP. Should any breach occur, corrective action will be taken.
Appendix 3 Community Engagement Activity		
20	We note the aims and objectives of this section and agree that these are essential to ensure the concerns and anxieties of the local community are adequately and fully resolved and respected. Our experiences to date with pre-construction surveys have not been encouraging in this regard.	Details of these investigation works are presented in the Onshore Site Investigation Works Update Note (document reference ExA.AS-9.D10.V1).
21	The local community have a wealth of knowledge about the flora and fauna, their habits, migratory patterns and transit paths through the area from personal observations over very many years. Through consultation they can help inform decision making and help avoid unnecessary habitat intrusions or ecological disturbance in areas that desk-top surveys or intermittent field surveys fail to fully reveal.	The measures for protecting ecological features will be set out within the final Ecological Management Plan (EMP) which must accord with the Outline Landscape and Ecological Management Strategy (OLEMS) (document reference 8.7), and will be informed by a pre-construction walkover of the entire onshore development area. An Ecological Clerk of Works (ECoW) will be onsite during construction to provide expert ecological advice and supervise works such that they are carried out in an ecologically sensitive way. Post-consent, the local community are welcome to provide any information on the local area through communicating with the community liaison officer.