



**SCOTTISHPOWER  
RENEWABLES**

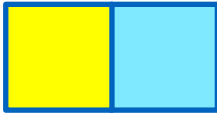
# **East Anglia ONE North and East Anglia TWO Offshore Windfarms**

## **Applicants' Comments on Richard Reeves' Deadline 11 Submissions**

Applicant: East Anglia TWO and East Anglia ONE North Limited  
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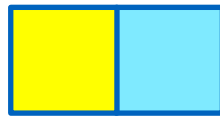
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Author: Royal HaskoningDHV

**Applicable to East Anglia ONE North and East Anglia TWO**



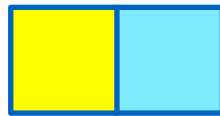
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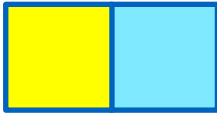
## Glossary of Acronyms

ALO	Agricultural Liaison Officer
AONB	Area of Outstanding Natural Beauty
DCO	Development Consent Order
ECoW	Ecological Clerk of Works
ExA	Examination Authority
GI	Ground Investigations
IP	Interested Party
PD	Procedural Decision



## 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 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.
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.



# 1 Introduction

1. This document presents the Applicants' comments on Richard Reeves' Deadline 11 submission as follows:
  - Richard Reeves' Deadline 11 Submission – Comments on any additional information/submissions received at deadline 10 (REP11-159);
  - Richard Reeves' Deadline 11 Submission – Supporting Video 1 (REP11-160);
  - Richard Reeves' Deadline 11 Submission – Supporting Video 2 (REP11-161);
  - Richard Reeves' Deadline 11 Submission – Supporting Video 3 (REP11-162); and
  - Richard Reeves' Deadline 11 Submission – Supporting Video 4 (REP11-163).
2. This document is applicable to both the East Anglia TWO and East Anglia ONE North 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 Richard Reeves' Deadline 11 Submissions

### 2.1 Applicants' Comments on Richard Reeves' Deadline 11 Submissions (REP11-159 to REP11-163)

ID	RR's Comment	Applicants' Comments
1	<p>Please see in attachments to follow, film of the Applicants construction teams and partners on plot 11, including noise, air pollution, and highly intrusive disturbance to vulnerable livestock and protected flora and fauna. In spite of all assertions and reassurances to the contrary, the work is routinely noisy, pollutant, intrusive, disruptive, and carried out careless of all or any consequences to both surrounding plants, animals, and people. It is conclusive proof, if any more were needed, of the standard modus operandi of the Applicants: pour torrent of empty mollification and quibbling legalese into the ears of any who may be forced to listen, then simply ignore any agreements and promises and do whatever they like, at any cost to local people and the environment we inhabit and care for. It is amoral thuggery, pure and simple, with one motive, and one motive only: financial gain.</p> <p>And this is not merely the opinion of a concerned AP / IP - it is the open admission of the Applicant themselves, expressed at every stage of these examinations. Reason for Landfall siting? - it's cheaper. Reason for cable-corridor route? - it's cheaper. Reason for rejecting available Brownfield sites? - it's cheaper. As I and many others have pointed out on many occasions, that decreased costs and increased profit should be the "compelling case" for destruction of a legally protected AONB cannot possibly be accepted by the Inspectorate, and we urge the Inspectorate in the most direct terms we can within the norms of mutual respect to look again at this utterly unacceptable breach of the most basic and vital regulations for use of an AONB. Surely, the only possible reasonable judgement must be to find the Applicants plans can not be consented.</p>	<p>The Applicants would highlight that although economic efficiencies do factor into the site selection process, it is far from the only consideration when developing projects such as these. The Applicants have confirmed throughout examination and maintain that technical, commercial, regulatory, environmental, planning and deliverability aspects are all assessed to refine the siting proposals for the Projects. <b><i>The Applicants refer to the Written Summary Of Oral Case (Issue Specific Hearing 2) (REP3-085) for explanation of this process.</i></b></p> <p>In response to the videos provided: Richard Reeves IMG_3081 Richard Reeves IMG_3214 Richard Reeves IMG_3087 Richard Reeves FullSizeRender</p> <p>The process of early Ground Investigations (GIs) is routine to support the refinement of design and suitable mitigation for the development, should consent be granted. In planning the ground investigations, the locations around the site have been chosen to minimise disturbance to the people, places, ecology and wildlife in the area.</p> <p>Ecological and environmental surveys, maps and plans have been consulted and reviewed to avoid any areas where there is any potential risk of ecological disturbance. The investigations are undertaken with a team including an</p>



ID	RR's Comment	Applicants' Comments
	<p>The east coast, against the clearly expressed will of its people, it's MP, the vast majority of its statutory bodies, councils, and key organisations dedicated to the preservation of this Area of Outstanding Natural Beauty, has been scarred with the utilitarian nickname, The Energy Coast - as if our only value is as a landing point for the multiple projects now seeking to take advantage of the current governmental Green Energy overview. These companies, Scottish Power Renewables, as it has relatively recently styled itself, being only one of an approaching Armada of profiteers, are not in any way part of a national Green Energy initiative or strategy, cohesively designed for the benefit of current and future generations of UK citizens. Rather, the company, inservice to its foreign owners and backers, seeks, and is constituted, only for the purpose of generating profit – at any cost. In nearby Theberton, during the last week or so, a new name is being blazoned on banners and posters: The Chaos Coast. And chaos it will be - the ham-fisted works pictured being a tiny fraction of the destruction to come if this amoral land-and-profit-grab somehow is granted consent.</p> <p>Please do not allow this organisation to set the example for the swarm of incoming private profiteers to follow.</p> <p>For future Green Energy management our country needs strategy, not licenced pillage. I would like to offer my support, thanks, and admiration to all the organisations and individuals who have joined together to oppose this reckless, amoral, and unprofessionally managed project. From delivering response forms to entirely wrong names and addresses, to live meetings with catastrophically malfunctioningtech, to presentations and ISHs where the Applicants' own officers and legal teams contradict each other, to paid-for surveys that present results tailored to fit pre-decided conclusions, to multiple gagging clauses and harassment of vulnerable local inhabitants, the Applicants have shown nothing but open contempt for people ,the environment, and our society as a whole.</p>	<p>independent Ecological Clerk of Works (ECoW) and an Agricultural Liaison Officer (ALO). Individual locations are assessed by the ECoW and work is not undertaken if the ecological risk is considered by them to be high.</p> <p>Where the ECoW confirms that the investigation at a particular location can proceed, it is completed with care and appropriate mitigation.</p> <p>All ecological receptors have exclusion buffers where no works are permitted prior to works, such as absolute minimum distances away from trees, hedges or sensitive species.</p> <p>Any transient constraints that may arise, such as nesting birds, are monitored by the ECoW and appropriate exclusions implemented throughout the entirety of the works.</p> <p>GIs for Projects require the use of a percussion drilling rig to collect soil samples, which does so by repeatedly dropping a metal cylinder into the ground.</p> <p>On the four videos submitted by Mr Reeves, the rhythmical noise at approximately 2 second intervals is the drop of the metal cylinder to collect the soil samples and advance the drilling.</p> <p>Each video appears to show the same single cable percussion drilling rig. The cable percussion rig is one of four in total that were used to drill about 20 holes along the cable corridor.</p> <p>In order to minimise noise disturbance to local people from the ground investigation works, work areas are surrounded by noise barriers at key noise receptors.</p>





ID	RR's Comment	Applicants' Comments
		<p>The drilling rig shown in the video is surrounded by acoustic barriers. These are not often used during this type of activity but SPR requested their use by the contractor to minimise noise disturbance to wildlife and local people. The acoustic barriers are installed correctly and are fixed to Heras fencing. Whilst the aim of using acoustic barriers is to minimise noise, it can't be eliminated completely.</p> <p>To further minimise any risk from percussion drilling activities, equipment to monitor groundwater levels may be installed afterwards.</p>