

LATE SCOPING CONSULTATION RESPONSES

Consultation bodies have 28 days to respond with any comments, stating either the information that they consider should be included in the ES or that they do not have any comments.

Any responses received after the deadline will not be considered within the scoping opinion but are forwarded to the applicant for consideration in accordance with the policy set out in the Commission's Advice Note 7: Environmental Impact Assessment, Screening and Scoping.

The following EIA scoping consultation responses were received after the consultation deadline specified under legislation and therefore did not form part of the Commission's scoping opinion.



MINISTRY OF DEFENCE

IPC

09 AUG 2011

REF:

Defence Infrastructure Organisation

Mr Rick Campbell
Infrastructure Planning Commission
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Rachel Harper
Safeguarding Assistant
Safeguarding - Wind Energy
Defence Infrastructure Organisation
Kingston Road
Sutton Coldfield
West Midlands
B75 7RL

Rachel Harper: 0121 311 2143
Facsimile: 0121 311 2218
E-mail: rachel.harper@de.MOD.uk
Internet Site: www.defence-estates.MOD.uk

Your Reference: 110706_EN010025_708355

Our Reference: DE/C/SUT/43/10/1/13983

01 August 2011

Dear Mr Campbell

DE Reference Number: 13983

Site Name: East Anglia One

Thank you for approaching the Ministry of Defence (MOD) for a scoping opinion on the above proposal.

The principal safeguarding concerns of the MOD with respect to the development of wind turbines relate to their potential to create a physical obstruction to air traffic movements, and cause interference to air traffic control and air defence radar installations.

Air Traffic Control (ATC) Radar & Range Control Radar

Where wind turbines are visible to ATC radars they have been shown to have detrimental effects on radar performance. These effects include the desensitisation of radar in the vicinity of the turbines, and the creation of "false" aircraft returns which air traffic controllers must treat as real. The desensitisation of radar could result in aircraft not being detected by the radar and therefore not presented to air traffic controllers. Controllers use the radar to separate and sequence both military and civilian aircraft, and in busy uncontrolled airspace radar is the only sure way to do this safely. Maintaining situational awareness of all aircraft movements within the airspace is crucial to achieving a safe and efficient air traffic service, and the integrity of radar data is central to this process. The creation of "false" aircraft displayed on the radar leads to increased workload for both controllers and aircrews, and may have a significant operational impact. Furthermore, real aircraft returns can be obscured by the turbine's radar returns, making the tracking of conflicting unknown aircraft (the controllers' own traffic) much more difficult.

Planning guidance establishes that wind energy developers should assess the affects of their proposed development upon aviation and defence interests and that they should engage in dialogue with the MOD at an early stage to identify concerns and potential mitigation to support of their application.¹

Accordingly the applicant should take account of MOD aviation and radar operations in completing the EIA particularly in identifying a suitable site for development and the dimensions of the turbines that are to be installed.

We therefore ask that the MOD be consulted about all wind turbine developments with a height of 11m or more or a rotor diameter of 2m or more by the developer at the earliest possible time in the development process in accordance with "Wind Energy & Aviation Interests Interim Guidelines". <http://www.bwea.com/pdf/Wind-Energy-and-aviation-interim-guidelines.pdf> . This is so that the development can be fully assessed and any MOD concerns be made known to the developer at an early stage of the development process.

We also ask that MOD be consulted by Consenting Authorities regarding all applications for wind turbine developments with a height of 11m or more or a rotor diameter of 2m or more so we can ensure that our concerns are taken into account in the decision making process.

In order to assess a proposed development, we need the following information:

1. Accurate grid coordinates for each turbine to the nearest metre,
2. The height of the turbines to blade tip, hub height and rotor diameter,
3. The number of rotor blades,
4. The wind farm generation capacity,
5. The number of turbines

MOD Safeguarding wishes to be consulted and notified about the progress of planning applications and submissions relating to this proposal to verify that it will not adversely affect defence interests.

I hope this adequately explains our position on the matter. If you require further information or would like to discuss this matter further please do not hesitate to contact me.

Further information about the effects of wind turbines on MOD interests can be obtained from the following websites:

MOD: <http://www.mod.uk/DefenceInternet/MicroSite/DIO/WhatWeDo/Operations/ModSafeguarding.htm>

Restats: <https://restats.decc.gov.uk/cms/aviation-safeguarding-maps/>

RenewableUK: <http://www.bwea.com/aviation/index.html>

Yours sincerely



Rachel Harper
Safeguarding Assistant – Wind Energy
Defence Infrastructure Organisation

¹Office of the Deputy Prime Minister- Planning Policy Statement 22 – paragraph 25
Scottish Government: National Planning Policy Guidance 6 "Renewable Energy Developments" – Paragraphs 52 to 53
Welsh Assembly Government: Practice Guidance – Planning Implications of Renewable & Low Carbon energy – July 2010 Section 3.4.21 – 3.4.26

Mr David Price
Infrastructure Planning Commission
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

Our ref: AE/2011/113020/01-L01
Your ref: 110706
Date: 03 August 2011

Dear Mr Price

**PROPOSED EAST ANGLIA ONE OFFSHORE WINDFARM (THE PROJECT)
PROPOSAL BY SCOTTISH POWER AND VATTENFALL (THE DEVELOPER)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2009 SI 2263 DETAILED SCOPING CONSULTATION REQUEST**

Thank you for your EIA Scoping consultation letter of 6 July 2011 received in this office by email of the same date. The comments in this letter should be read in conjunction with our earlier letter dated 28 October 2010. There may be a degree of overlap between our two letters.

Environment Agency position

We have reviewed the scoping report submitted and have further comments to make in respect of pollution prevention, groundwater and land contamination, flood risk and coastal processes to ensure that the Environmental Statement will appropriately address the environmental issues we consider are of most importance for this proposal.

Our technical comments detailing the information we consider should be provided in the environmental statement are provided below.

Pollution Prevention and Control

The Scoping Report does not seem to make any mention of assessing potential contamination of ground that the onshore cabling will pass through. Potential routes for cables need to look into whether they might pass through contaminated land or historic landfills/disposal sites and assess the potential effects. We understand that the Corporate Services team in this office has recently provided the developer with information on current and historic landfill sites in the vicinity of the route corridors for

Environment Agency
Iceni House, Cobham Road, Ipswich, Suffolk, IP3 9JD.
Customer services line: 03708 506 506
www.environment-agency.gov.uk

Cont/d..

the onshore cable.

Groundwater and Land Contamination

Section 7.1.1 “Geology, Hydrology and Hydrogeology”, of the scoping report would appear to cover the relevant issues related to the potential presence of land contamination associated with the on-shore elements of the proposed development and the potential impacts on groundwater/surface water quality from activities associated with its construction and operation that are to be addressed as part of the EIA and detailed in the ES.

In that regard the scoping report indicates a Phase 1 Preliminary Geo-environmental Risk Assessment for a 100m wide Cable Route corridor and the Converter Station site, following current best practice guidance on the assessment of contaminated land, including the Environment Agency ‘Model Procedures for the Management of Land Contamination’ CLR Report 11”, will be prepared and provided as a technical appendix to the ES. It further indicates that based on this preliminary risk assessment, recommendations will be made for further assessment as necessary, including any requirement for a Phase 2 ground investigation.

With respect to land that may have been affected by contamination as a result of its previous use or that of the surrounding land, sufficient information must be provided with the planning application to satisfy the requirement of Planning Policy Statement 23: Planning and Pollution Control (PPS23), in the form of a Preliminary Risk Assessment (including a desk study, conceptual model and initial assessment of risk), and to provide assurance that the risk to controlled waters is fully understood and can be addressed through appropriate measures.

In that regard, provision of the information indicated in the scoping report, including full copies of any Phase1 and Phase 2 investigation reports would appear likely to meet the requirements of PPS23.

Where the cable route or Converter Station site is located on land that may have been affected by contamination, such as the former Fisons site at Paper Mill Lane, the site will need to be subject to intrusive investigation, assessment and remediation as may be necessary to ensure the development does not cause or promote the contamination of controlled waters by the mobilisation of contaminants or creation of preferential pathways.

It will need to be demonstrated through the EIA that the finalised cable route and location of the Converter Station, together with any proposed mitigation measures, will not have an unacceptable impact on, or pose an unacceptable risk to controlled waters. This is particularly the case for sites where controlled waters are considered to be of high environmental sensitivity due to the presence of such receptors as Groundwater Source Protection Zones, Private Drinking Water Supply locations, Principal Aquifers and surface water courses.

Flood Risk

Landfall

Potential landfall locations have been identified as either between Bawdsey Martello Tower and Bawdsey Manor or between Felixstowe and Felixstowe Ferry. Any cabling should be directed away from any formal flood defences. If the

cabling is laid within nine metres of a flood defence then a Flood Defence Consent from us will be required.

Paragraph 3.4.3 of the scoping report states “Jointing pits will be required a short distance behind the sea defence to house the offshore to onshore cable joints. Each jointing pit will comprise a shallow concrete-lined structure with access by a manhole cover...jointing pit may be up to 10m (width) x 15m (length) x 5m (depth)”. Further details of the exact location of these jointing pits will be required. It will also need to be ensured that we can still access any defences as a result of the jointing pits and that the pits themselves will not undermine the integrity of any defences.

Route

The route from landfall to Bramford, potentially crosses several main rivers. It is stated that the desired route for the cabling will be underground and where the route crosses any rivers, then directional drilling methods will be used. This method is acceptable to us. In such a scenario we will request that the cable and any protective surround to the cable will be laid at least one metre below the hard bed of the river and shall remain at or below this level for a distance of not less than three metres from the bank of the river bank before rising at a slope no greater than 1 vertical in 1.5 horizontal.

An Environment Agency Flood Defence Consent will be required for any cables that are in, under, over or within nine metres of a designated main river.

In addition we require that no spoil is placed in heaps in areas delineated as Flood Zones 2 and 3. If this unavoidable, any heaps should be placed as far away from the river as possible and kept for a short as possible time period. i.e. dig the trench for a particular section, place the spoil as far away as possible, lay the cable, put the spoil back in the trench.

Onshore Converter Station

A Flood Risk Assessment will be required if the onshore converter station lies within Flood Zone 2 or Flood Zone 3 of our indicative flood maps. This is a requirement as is stated within Table D.1 in Annex D to Planning Policy Statement 25 ‘Development and Flood Risk’. A sequential approach should be taken on the location of the station and preferably it should be positioned in the lowest risk area – Flood Zone 1.

The converter station and associated works may be over 1ha in size. In this instance, regardless of what flood zone the development is in, a Flood Risk Assessment looking at the surface water disposal from the site will need to be undertaken. With the issue of contaminated land in this area, it is imperative that preliminary talks with the Environment Agency are conducted to ensure a smooth agreement for the disposal of surface water.

Coastal Processes

We have no further comments on this aspect except to mention that cable landfall at either Felixstowe Ferry or Bawsdey will need to be mindful of the policy position for the coastline under the Suffolk Shoreline Management Plan (Lowestoft Ness and Felixstowe Landguard Point) which is expected to be adopted later this year.

Yours sincerely

Andrew Hunter
Planning Liaison Officer

Direct dial 01473 706749

From: [LINDA ROWLANDS](#)
To: EastAngliaONE@eastangliawind.com;
cc: [IPC Scoping Opinion](#);
Subject: PROPOSED EAST ANGLIA ONE OFFSHORE WINDFARM
Date: 05 August 2011 16:25:39

Dear Sir or Madam

Refs: 110707-EN010025-708078

1. The Shotley Parish Council feel that as the whole area around our shorelines is very environmentally sensitive: AONB, SSSI, SPA, and RAMSAR, it will be essential that the route the transmission takes should be as far away from these protected areas as possible. Obviously you cannot route through conurbations, but I believe that near housing and not in the middle of unspoilt countryside would be the best route. I believe that unnecessary estuary crossings should be avoided ie the Deben and the Orwell - and a land route should be chosen if possible.

Therefore, looking at your map I would suggest that the most northerly and easterly route crossing the Deben close to Woodbridge would be one alternative - or the southerly route proceeding up the Felixstowe peninsula to the outskirts of Ipswich and crossing the Orwell there (could it be within the bridge structure?) would be another alternative route.

In your 4 fold information leaflet called Electrical Transmission Works - the last section "Onshore Area of Search", 2nd paragraph, you have left out an important farming consideration in that most of the farms along these routes have significant infrastructure of underground irrigations mains, reservoirs and bore holes which would have to be considered.

4. I believe that East Anglia Offshore wind should visit all the potential parishes to be crossed and advertise in parish media about the whole idea of the Electrical Transmission Works.

Regards

Linda Rowlands, Shotley Parish Clerk
A: 33 Orwell View Road Shotley Ipswich IP9 1NW
T: 01473 788248
E: shotleypc@btinternet.com
W: www.myshotley.com

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