

Complaints procedure

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Revision Summary				
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1	13.06.22	E Rees	C Sibley	M Woollorton
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Description of Revisions			
Rev	Page	Section	Description
1	ALL	ALL	New Document
2	ALL	ALL	Document number updated. Package updated to GENERAL as Project has deemed CST no longer a package
2	ALL	ALL	References to Cintellate/ONEHS changed to 'SafetyCulture'
2	ALL	ALL	Stakeholder Manager references prefixed by 'Senior'
2	4	2.4	Out of hours contact procedure amended
2	7	3.3	Process clarified in bullet points
2	7	3.4	New section on anonymous complaints added
2	7	3.5	New section on anonymous complaints added
2	9	3.17	References to individual planning authorities consolidated under 'local planning authorities'
2	9	3.24	Grammatical errors corrected
2	10	3.24	Grammatical errors corrected
3	7	3.4	Anonymous complaints updated
3	7	3.5	Anonymous complaints updated
3	8	3.6	Anonymous complaints updated

TABLE OF CONTENTS

1	Introduction	4
2	Responsibilities	4
	Onshore Complaints	4
	Offshore Complaints	6
3	Procedure	7
	Community Liaison Officer	7
	Anonymous Complaints	7
	Logging Anonymous Complaints	7
	Environmental specific complaint notification process	8
	Receipt and recording of environmental complaints and Notices	8
	Timescales for investigation and action of complaints and Notices	8
	Close-out of interactions, complaints and Notices	9
	Documentation associated with a complaint and Notice	9
	Offshore complaints process	9
	Appendix A - Timeline for resolving onshore complaints.....	11
	Appendix B – Onshore complaints escalation procedure	12
	Appendix C – Timeline for resolving offshore complaints.....	13

1 Introduction

- 1.1. The purpose of this procedure is to provide guidance on the process for recording and responding to complaints and interactions received from members of the public and Notices received from stakeholders (such as a Stop Notice from the Environment Agency, or other Notices from Local Authorities, Natural England etc.) associated with Scottish Power Renewables' (SPR) activities during the construction phase of East Anglia THREE Offshore Windfarm (EA THREE). This procedure applies to the EA THREE project and all construction activities associated with it. The aim of the procedure is to ensure that all complaints are resolved as fully and as timely as possible.
- 1.2. Complaints/Notices outside the scope of this Procedure are as follows:
- Objections, complaints or representations on submitted Planning Applications/Section 36 Applications are required, by legislation, to be lodged within four weeks of the submission to the consenting authority (Planning Authority or Central Government) and subsequently dealt with by them. Therefore, this procedure excludes any public complaints, which relate specifically to Planning Applications/Section 36 Applications.
 - Complaints that should be addressed through other relevant complaint procedures (e.g. Advertising Standards Authority).

2 Responsibilities

- 2.1 The following EA THREE positions are responsible within the complaints process and should support the closure of complaints according to the discipline which caused the complaint notification.

Onshore Complaints

2.2 **Senior Stakeholder Manager**

The Senior Stakeholder Manager is responsible for overseeing all engagement with communities and those with an interest in the project.

2.3 **Community Liaison Officer (CLO)**

All community queries relating to the onshore works should be directed to the CLO in the first instance. A community query is received from people who do not have an interest in land within the EA THREE development area (red line boundary). The CLO will be the first point of contact for any public concerns, queries or complaints and will maintain a record of all correspondence in Tractivity, the corporate database. The CLO is also responsible for sharing a summary of interactions with the SPR project team in a monthly report.

- 2.4 The CLO will be contactable by phone on 07818 026934 during normal working hours or by email at eastangliathree@scottishpower.com. Contact details of a delegated site supervisor will be provided in notification for any works taking place outside core hours.

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- 2.5 On receipt of a complaint, the CLO is responsible for reviewing the details, assessing the complaint and instigating investigation and response actions. If the complaint is focused on an environmental or ecological concern, then the SPR Environmental Team will immediately be involved in investigating the complaint. Environmental complaints should be logged in the SafetyCulture system by the Environmental Manager/Advisor.
- 2.6 If the complaint expresses a Health and Safety (H&S) concern, or has H&S implications, the SPR H&S Manager, Client Representative and project manager will immediately be informed by the CLO.
- 2.7 Internally, the CLO will work closely with the following SPR personnel:
- Senior Stakeholder Manager
 - Construction Management Team and Client Representatives
 - Construction Land Manager (CLM)/SPR Land Agents
 - Consents Compliance Team
 - H&S Site Team
 - Environmental Team
 - Principle Contractor and sub-contractors, through the SPR Client Representatives
- 2.8 External to the project, the CLO will work closely with the:
- Local Planning Authorities
 - Suffolk County Council
 - Local Communities and Organisations
- 2.9 **SPR Construction Land Manager**
The SPR Construction Land Manager (CLM) is responsible for overseeing all engagement with landowners (those with an interest in land within the redline boundary) and their agents throughout the construction phase.
- 2.10 On receipt of a complaint from a landowner or their agent, the SPR CLM is responsible for reviewing the details, assessing whether the complaint is justified and instigating investigation and responsive actions as necessary. If the complaint is focused on an environmental concern, the CLM shall inform the Environmental Team, who shall log it on the SafetyCulture system.
- 2.11 The CLM will provide the CLO with a weekly update of complaints received from landowners for inclusion in the Community Report.

2.12 Internally, the CLM will work closely with:

- SPR's Land Team
- SPR's Land Agents and Agricultural Liaison Officer (ALO)
- Construction Management Team
- Community Liaison Officers
- Consents Compliance Team
- Project Management Team
- Principal Contractors and subcontractors
- Arboricultural and Ecological Clerk of Works
- Health & Safety Site Team
- Environmental Site Team

2.13 Externally, the CLM will work closely with:

- Landowners
- Land Agents

2.14 SPR Land Agents

All enquiries from landowners or their agents relating to the onshore works should be directed to the CLM and SPR's Land Agents in the first instance.

2.15 SPR's Land Agents will appoint an ALO to be on site throughout construction. The ALO will be available to talk to landowners on site and to act as an interface between landowners and the construction teams.

2.16 SPR Onshore Consents Compliance Manager (OCCM)

The OCCM is responsible for reviewing any complaints concerning a potential breach of consent and overseeing any interaction with local and national stakeholders.

2.17 Client Construction Managers and Client Representatives

These roles are responsible for supporting the CLO and CLM with the closure of all complaints or notices, within the time frames set out in [Appendix A](#), through delegating to the applicable teams under their authority. They shall ensure this procedure is complied with and that they provide the CLO and CLM with the required information to respond / close out the complaint / notice.

Offshore Complaints

2.18 Brown and May Marine (BMM) have been appointed by SPR to act as the Company Fisheries Liaison Officer (CFLO) to manage enquiries and complaints from the fishing community and other maritime stakeholders. The offshore process is described in 3.24.

3 Procedure

Community Liaison Officer

- 3.1 All onshore community interactions will be reported to the CLO, while all onshore land issues will be reported to the CLM. The CLO will liaise as quickly as possible with relevant personnel / departments and Client Representatives. If the interactions are received by other staff, the details should be brought to the attention of the CLO and CLM as soon as possible. The information provided to the CLO should include the name and contact details of the Complainant, the date the interaction was received, and details of the issue reported, and any immediate remedial measures undertaken. A high-level summary of the process is provided in [Appendix A](#).
- 3.2 All site-based personnel and related contractors via the site induction should have the name and contact details of the CLO and CLM. They will be briefed that all community/land interactions are to be reported directly to the CLO and CLM. The CLO's details will be available to the public for direct contact to be made. Landowners' land agents will have contact details for the CLM.
- 3.3 The CLO/CLM will in a timeous and competent manner:
- Enter the details of the complaint on Tractivity, the SPR stakeholder engagement tool. The entry should include date and location of the complaint and any relevant information (noise, dust, lighting) to aid investigation.
 - Include any supporting information provided, such as drawings or photographs
 - Inform the relevant SPR Construction Manager or Client Representative.
 - Acknowledge the complaint by email/phone to the public contact, confirming that the complaint has been received, is being reviewed and that contact will be made to update on progress as soon as possible.
 - Review the interaction and refer to the CLM and relevant personnel. This allows information to be uploaded to different department systems, for example: Environmental; Land; Consents, or Health & Safety by the relevant teams.
 - Escalate to the senior project staff; Offshore Management Team; Legal Team or Comms Team if necessary.
 - Contact the Complainant to provide details of the action taken, the resolution or timescales on progress taken.
 - Update Tractivity with details of the investigation and resolution.

Anonymous Complaints

- 3.4 Complaints may be given anonymously or through a third party, such as a parish council or local planning authority.

Logging Anonymous Complaints

- 3.5 If a complaint has been made anonymously through a third party, such as a parish council or local planning authority, the complaint will be logged in Tractivity against the third party.

3.6 If the complainant contacts EA3 directly, but wishes to remain anonymous, then the complaint will be logged against a placeholder in Tractivity. The rest of the procedure will still be followed. However, it will not be possible to confirm the complaint has been resolved to the satisfaction of the complainant.

3.7 Dependant on whether the issue is public or landowner specific, each case is to be reviewed by the CLO with escalation to the Senior Stakeholder Manager if necessary or the CLM with escalation to the Client Construction Manager if necessary. Feedback is to be provided to the public contact within the agreed timescales.

Environmental specific complaint notification process

3.8 An environmental specific complaint is defined by a suspected breach of planning / consent conditions, and or legislation which results in pollution such as air quality, light, noise, soil, water and or ecological impact of nearby communities

3.9 SafetyCulture provides a mechanism for the recording and reporting of environmentally focused Public Complaints and Stakeholder Notices. It is used to report into the annual Scottish Power Renewables Management Review and Iberdrola Annual Reporting requirements.

3.10 All environmental specific complaints and notices associated with EA THREE activities are required to be reported centrally within the SafetyCulture system by The Environmental Manager/Advisor). This process will be undertaken by the Onshore and Offshore Environment teams.

3.11 If the project receives more than five public complaints regarding the same issue, it should be noted in the Public Complaints entry by the Environment Team. Once this threshold has been exceeded or the relevant Complaint Owner deems it likely that the source of the complaint may generate more public complaints, further entries are not required in SafetyCulture. The complaint will be recorded and reported in the Project Specific Interface Register/Tractivity).

3.12 The complaint will be closed in SafetyCulture by the Environment Team.

Receipt and recording of environmental complaints and Notices

3.13 When environmental specific complaints and notices are received, either via the office, site-based staff, written or verbally, the CLO, Environmental Team, Senior Stakeholder Manager and relevant SPR site manager (Client Representative) must be informed. The CLO will initiate the process set out in 3.1 by informing the Environmental Manager/Advisor and, if appropriate, the CLM.

3.14 The CLO will record the complaint as set out in 2.3. Environmental Notices will be actioned by the Environmental Team in SafetyCulture.

Timescales for investigation and action of complaints and Notices

3.15 Within 1 day, the CLO will inform the relevant parties as set out above in Section 2.

- 3.16 The SPR Client Representative will assess the complaint with the applicable department manager or delegate. Depending on the nature of the complaint the Legal team may also be consulted during the screening phase. The SPR Client Representative will identify sufficient resources to investigate the complaint.
- 3.17 The CLO will liaise with the OCCM and notify the LPAs of any matters requiring action or consideration within 48 hours. In addition, a summary of complaints, issues raised, and community engagement will be shared with the local planning authorities as relevant, at the Steering Group/Implementation meetings.
- 3.18 The CLO will respond to the complainant within seven days of complaint receipt, acknowledging the complaint and explain the proposed course of action.
- 3.19 Where a Notice is received from a stakeholder (such as the Local Authority, Environment Agency), resources from the EA THREE Consents Team (and where appropriate, the SPR legal department), will be required to comply with and/or respond to the Notice as required. Support may also be required from the Legal Team depending on the type of Notice.

Close-out of interactions, complaints and Notices

- 3.20 For public complaints the target close out should be no more than 21 days from receipt of the complaint. Where more detail is required, particularly from external parties, additional time may be required.
- 3.21 The relevant Client Representatives and SPR project managers will be responsible for agreeing the complaint has been resolved. A response should be provided to the complainant.
- 3.22 Where a Notice is received from a stakeholder that sets a specific timeline for close out, this will override the 21 days set out above.

Documentation associated with a complaint and Notice

- 3.23 External correspondence regarding a complaint or Notice will be recorded on Tractivity. Depending on the Notice, there may be associated external investigations and confidentiality issues, and the Legal Team may therefore request that associated documents are treated as confidential and set protocols that are required to be followed.

Offshore complaints process

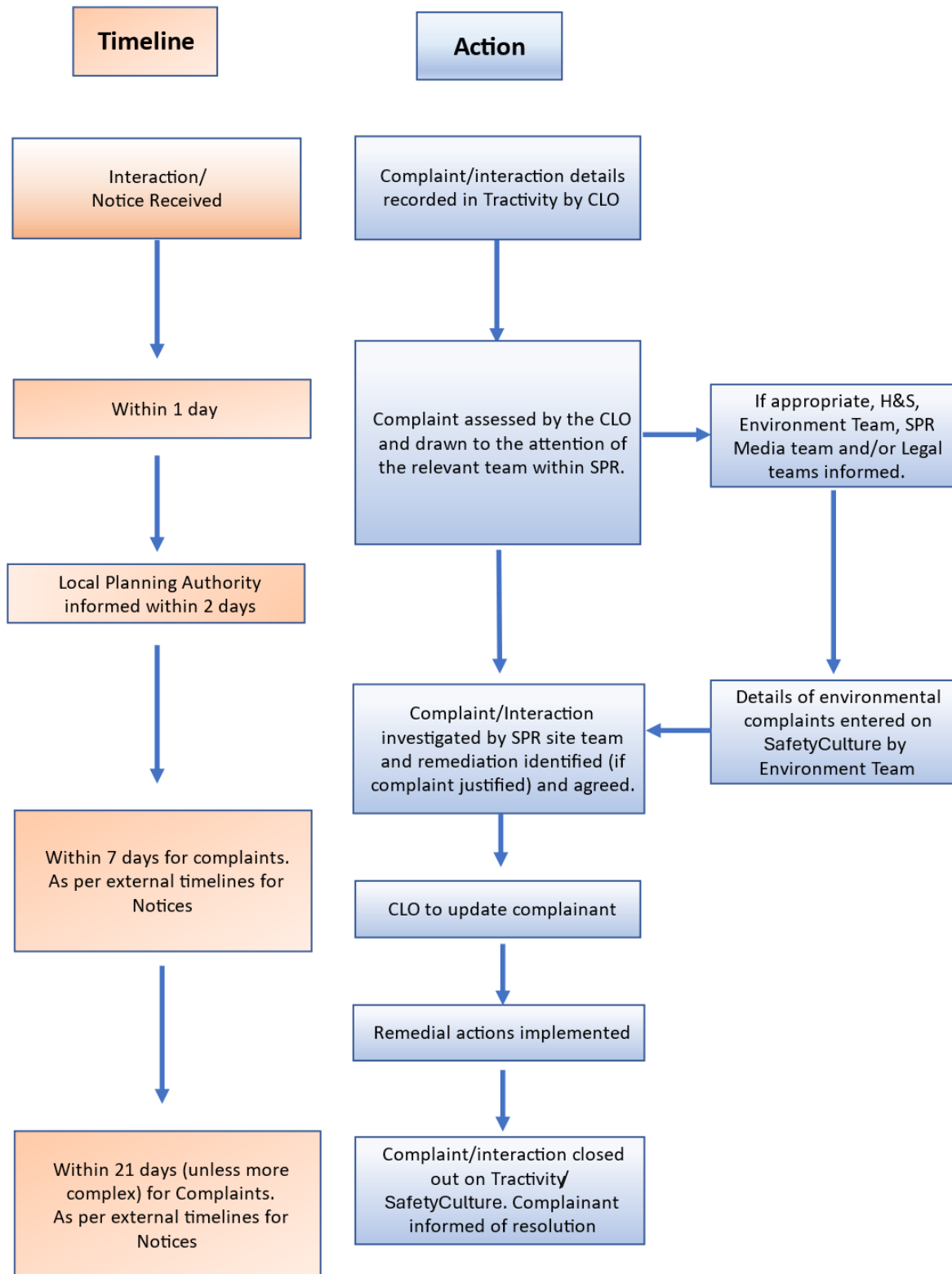
- 3.24 The offshore complaints process is managed by an Offshore Fisheries Liaison Officer (OFLO) on behalf of BMM and SPR. A high-level summary of the process is provided in Appendix C. The process works as follows:
- When the OFLO receives a complaint, it is logged the same day or nearest working day.
 - Depending on the complaint and the mode received, the OFLO may contact the complainant for further information as required and the complaints log will be updated.
 - Within a week, the complaint will be discussed with the Client Offshore Construction Manager, Offshore Client Representative (Offshore Consents Team)

and the CFLO within BMM. If the complaint has environmental or H&S implications, then the offshore Environment and/or H&S team will also be informed. An action plan will be agreed.

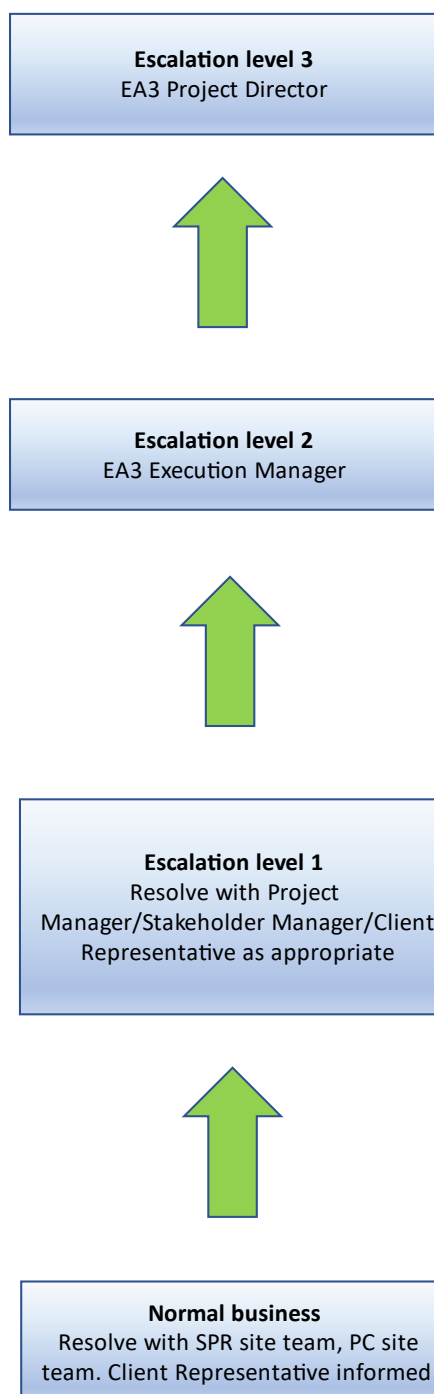
- The Client Offshore Construction Manager and Client Representative will decide whether the action plan has been successfully implemented and the issue resolved.
- The OFLO will reply to the complainant with the conclusion and details of any actions taken and log the correspondence. This should typically take place within two weeks but may vary due to the nature of the complaint.

3.25 Should the onshore local community have a query, or make a complaint about offshore activities, the CLO will liaise with BMM and the SPR Offshore Construction Manager to address any issues and respond.

APPENDIX A - TIMELINE FOR RESOLVING ONSHORE COMPLAINTS



APPENDIX B – ONSHORE COMPLAINTS ESCALATION PROCEDURE



APPENDIX C – TIMELINE FOR RESOLVING OFFSHORE COMPLAINTS

