

East Anglia THREE

Planning Statement

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1. INTRODUCTION

1.1 The Project

1. East Anglia Offshore Wind Limited (EAOW) has a Zone Development Agreement with The Crown Estate to develop approximately 7.2 gigawatts (GW) of offshore wind projects off the coast of East Anglia, in Zone 5, under the Round 3 Offshore Wind Licensing Arrangements. EAOW has renamed this zone the East Anglia Zone. The East Anglia Zone will be developed as a number of individual windfarms, each dependent on securing the relevant statutory consents and approvals.
2. EAOW is a joint venture owned 50:50 by ScottishPower Renewables (UK) Limited (SPR) and Vattenfall Wind Power Ltd (VWPL). The joint venture has been formed for the development of the East Anglia Zone.
3. The proposed East Anglia THREE project (the project) comprises the second project to be developed within this zone and would have an installed generating capacity of up to 1,200 megawatts (MW). The proposed project would comprise offshore wind turbines and offshore electrical platforms, and offshore and onshore export cables taking power to onshore electrical substations.
4. East Anglia THREE Limited (EATL) is submitting a Development Consent Order (DCO) application to construct the project 69km from its nearest point to the port of Lowestoft on the East Anglia coast. The DCO application for the proposed East Anglia THREE project includes all the windfarm elements as well as associated development relating to offshore and onshore electrical transmission works that are deemed necessary for its construction and operation and for the transmission of power to the National Grid.
5. The key offshore components of the project are as follows:
 - Offshore wind turbines and their associated foundations (between 100 and 172 wind turbines each having a rated capacity of between 7 and 12MW);
 - Offshore electrical platforms – up to four collector substations and up to two converter stations;
 - Sub-sea cables including inter-array cable, platform link cable, export cable, and interconnector cable;
 - Fibre optic cables;
 - A possible separate accommodation platform and associated foundations;

- Scour protection around foundations and cable protection on sub-sea cables;
 - Up to two meteorological masts and associated foundations; and
 - Monitoring equipment including up to two floating Light Detection and Ranging (LiDARs) and two wave buoys.
6. The key onshore components of the project are as follows:
- Landfall site with associated transition bays to connect offshore and onshore cables;
 - Up to four onshore electrical cables;
 - Up to 62 jointing bay locations each with up to two jointing bays;
 - One transition bay location with up to two transition bays
 - One onshore substation compound (for up to two electrical substations);
 - Up to two onshore fibre optic cables; and
 - Landscaping and tree planting around the substation location.
7. The East Anglia THREE project would be constructed using either a Single Phase approach or a Two Phased approach with each phase comprising up to 600MW.

1.2 Need for the Project

8. The Kyoto Protocol is an international agreement which sets targets for industrialised countries to cut their greenhouse gas emissions. The protocol was agreed in 1997, based on principles set out in a framework convention signed in 1992 which came into effect in 2005. At the end of the 2012 United Nations Climate Change Conference, an agreement was reached to extend the protocol to 2020 and to set a date of 2015 for the development of a successor document. In line with the Kyoto Protocol, signatory states, including the UK, have developed national targets for energy generation from renewable sources. The proposed East Anglia THREE project would contribute towards these targets.
9. The European Council (EC) Directive 2009/28/EC 'on the promotion of the use of energy from renewable sources' ('the Renewables Directive', European Council 2009) imposes a binding target for 20% of overall European Union (EU) energy consumption to be provided by renewable technologies by 2020.

10. The 2030 policy framework for climate and energy proposed by the European Commission in October 2014 builds on the experience of, and lessons learnt from, the 2020 climate and energy framework. The European Commission has proposed new climate and energy targets up to 2030. The proposed East Anglia THREE project would not be constructed by 2020; however, it would make a large contribution to the 2030 and subsequent 2050 targets to be discussed at the United Nations Climate Change Conference in Paris in December 2015.
11. The United Kingdom (UK) requires a range of energy generation infrastructure in order to ensure it has a secure and affordable energy supply and can meet its binding commitments to addressing climate change. Offshore wind as a source of renewable energy offers the UK a wide range of benefits from an economic growth, energy security and climate change perspective. The proposed East Anglia THREE project would make a large contribution to renewable energy supply and consequently help provide these benefits to the UK and globally.
12. There are four key drivers for the shift in energy production to renewable sources in the UK and these form the basis for the relevant National Policy Statements (NPSs) which cover energy policy. The drivers – which are described below – are as follows:
 - The need to provide a secure, dependable and affordable energy supply for the UK;
 - The need to tackle climate change;
 - The need to bring new energy generating infrastructure onstream to replace more polluting sources of energy; and
 - The need to maximise economic opportunities for the UK.
13. Energy consumers need to have access to reliable, secure and affordable energy supplies. Without action the UK will continue to become ever-more reliant on imported energy sources and increasingly exposed to global energy price fluctuations. The proposed East Anglia THREE project can make a significant contribution to securing the UK's home grown energy supplies for decades to come.
14. Studies by the Department of Energy and Climate Change (DECC) suggest that if the current levels of global emissions of greenhouse gases such as carbon dioxide (CO₂) continue, there could be an average global temperature rise of up to 6°C by the end of this century. The UK has put in place a legally binding framework (implemented through The Climate Change Act 2008) to cut emissions by 80% from levels in 1990 by 2050. The changes associated with such a temperature rise include increased

frequency of extreme weather events such as floods and drought which in turn may cause an increase in global instability, conflict, public health-related deaths and migration of people to levels beyond any recent experience.

15. The UK Government has made firm commitments to ensuring that the UK meets its carbon reduction targets and creates a low carbon economy with renewable energy generation at its core. Offshore wind, especially large projects such as the proposed East Anglia THREE project, would help the UK meet its obligations.
16. The Planning Act 2008 makes provision for National Policy Statements (NPSs). NPSs are designed to set the policy framework for determination of nationally significant infrastructure projects (NSIPs) applications. They integrate the Government's objectives for infrastructure capacity and development with its wider economic, environmental and social policy objectives, including climate change goals and targets, in order to deliver sustainable development.
17. There are 6 NPSs relating to energy, three of which are relevant to this project, these are; EN-1, EN-3 and EN-5 which are discussed further in this Planning Statement.
18. The UK is well placed to lead the deployment of offshore wind with an estimated 33% of the total European potential offshore wind resource making it one of the most globally attractive locations.
19. The key benefits of offshore wind energy as a contributor to the renewable energy mix are as follows:
 - Diversification and security of home grown energy generation capacity making use of an abundant source of energy;
 - A technology with potential to make significant and rapid contributions to the national renewable energy targets;
 - Economic development and job creation, both within the UK and further afield within the supply chain; and
 - Very low lifetime CO₂ emissions per unit of electricity generated.
20. The continued development of offshore wind within the UK is therefore seen as critical to ensuring that the UK and Europe are able to meet their binding energy and climate change targets.

21. The proposed East Anglia THREE project would make a significant contribution to the achievement of the national renewable energy targets and to global efforts to tackle climate change.
22. Moreover, the proposed East Anglia THREE project would have a direct positive impact by providing up to 1,200MW of renewable energy, securing supply for up to 770,000¹ households, reducing carbon emissions and contributing to the economy by providing jobs during all phases of the proposed project.

1.3 The Application

23. Development consent is required under the provisions of the Planning Act 2008 (as amended) (the Act) for development that is, or forms part of, a Nationally Significant Infrastructure Project (NSIP).
24. As a project that will generate energy, the proposed East Anglia THREE project falls within the definitions of Section 15(3) of the Act as it will have an installed capacity of more than 100MW. Accordingly, EATL has submitted a DCO application to The Planning Inspectorate under the Act for both the onshore and offshore elements of the project.
25. The draft DCO also includes a deemed marine licence under the Marine and Coastal Access Act 2009 to authorise the marine activities associated with the project.
26. Following a period of examination and resultant recommendation made by The Planning Inspectorate, a decision will be made by the Secretary of State for Energy and Climate Change on whether to grant development consent for the project to proceed.
27. In addition to the DCO, EATL will make a number of separate applications for other consents and licences that are required to allow construction and operation of the proposed East Anglia THREE project.
28. Subject to consent being granted, it is anticipated that the construction of the offshore windfarm will take up to four years to complete, with the earliest start date for construction being 2020.

1.4 The Planning Statement

29. This Planning Statement has been prepared in support of EATL's East Anglia THREE DCO application, the purpose of which is to set out the planning context applicable

¹ Calculated using a 31.96% capacity factor (the UK average for offshore wind as supplied by DECC Digest of United Kingdom Energy Statistics) and an annual household consumption of 4,266 kilowatt hours.

to the project and identify those policy considerations that will be material to the decision-making process.

30. The Planning Statement forms part of the suite of DCO application documentation submitted to The Planning Inspectorate for examination.
31. The project has been subjected to formal Environmental Impact Assessment (EIA) procedures, the outcomes of which have been reported in a project Environmental Statement (ES) that accompanies the DCO application. The project has also been subject to a Habitats Regulations Assessment (HRA) to determine its potential effects on European Designated Sites.
32. Aspects concerning the need for the scheme, the site selection process, and alternative designs and technologies considered by EATL during the design-development process are explained fully in Volume 1 of the ES and only presented in summary form within this Planning Statement, where applicable. The full legislative and policy context relating to renewable energy within which the project would be progressed is also presented in Chapter 3 Policy and Legislative Context of the ES.
33. The outcomes of the EIA and HRA have informed the content of this Planning Statement, specifically in relation to assisting the determination of compliance (or otherwise) between the project and the overarching planning framework.
34. The remainder of this Planning Statement is structured in the following manner:
 - Section 2: This section presents an overview and appraisal of the planning framework against which the application will be examined and tested, identifying policies with a clear focus on promoting the development of onshore and offshore renewable energy infrastructure.
 - Section 3: This presents a detailed assessment of the relationship between the project and individual planning policies relating to subject specific issues at the national, regional and local level.
 - Section 4: This section draws together the various policy strands and tests set out within the Statement, summarising how the application accords with key planning policy.

2. PLANNING POLICY CONTEXT AND APPRAISAL

2.1 Planning Policy Framework

35. The key factors that will be given due regard as part of the project decision-making process comprise the following;
- Relevant National Policy Statements (NPSs) for energy;
 - Local Impact Report(s) prepared and submitted by local authorities covering areas encompassing the application site;
 - Matters prescribed in relation to development of the description to which the application relates, as set out in The Infrastructure Planning (Decisions) Regulations 2010; and
 - Any other matter(s) that the decision-maker considers both 'important' and 'relevant' to their decision.
36. The following sub-sections set out the national, regional and local position specifically in relation to policies that support the provision of renewable energy. Compliance (or otherwise) with specific policies and policy objectives concerning other matters such as environmental protection is set out in Section 3 of this Planning Statement.

2.2 National Policy Statements

37. NPSs form primary planning policy documents that are specifically provided under the Act to guide decision-making on NSIP applications.
38. Designated NPSs constituting the principal basis for the determination of the project are as follows;
- Overarching National Policy Statement for Energy (EN-1);
 - National Policy Statement for Renewable Energy Infrastructure (EN-3); and
 - National Policy Statement for Electricity Networks Infrastructure (EN-5).
39. The decision-maker will therefore be required to determine the application in accordance with the above NPSs, except to the extent that one or more of the matters set out in Section 104(4) to 104(8) of the Act apply. Such matters can include where a decision-maker is satisfied that the adverse impacts of a development proposal will outweigh its declared benefits.

2.2.1 National Policy Statement EN-1

40. EN-1 provides an overarching general policy to apply to all NSIP proposals for energy generating technologies.
41. EN-1 sets out the need for energy NSIPs, noting that the UK requires a mix of energy infrastructure types if it is to achieve security of supply, reduce greenhouse gas emissions and meet legally binding targets. The continued development of offshore wind energy projects is therefore of vital importance to helping ensure the UK is able to meet its targets.
42. EN-1 lists a range of generic impacts associated with nationally significant energy infrastructure that need to be given due regard in applications, covering topics such as the Historic Environment, Land Use and Traffic and Transport.
43. The document makes clear that decision-making should be done on the basis that the urgent need for energy infrastructure has already been demonstrated by the Government, and in determining applications the decision-maker should give substantial weight to the contribution that a development project would make towards satisfying this need.
44. There is, therefore, a presumption in favour of granting consent for energy NSIPs unless other more specific or relevant policies indicate that consent should be refused. The consideration of energy NSIP applications does, however, need to compare the benefits of a proposal against its potential adverse effects.
45. EN-1 makes clear that in the event of conflict between an energy NSIP and policies set out in the Local Development Framework(s), the NPS takes precedence in the decision-making process.
46. EATL believe that the proposed project will make a valuable contribution to emissions reduction by helping shift reliance away from traditional fossil fuels and represents a significant opportunity towards ensuring security of the UK's future energy supplies.

2.2.2 National Policy Statement EN-3

47. In conjunction with EN-1, EN-3 provides the primary basis for decision-making on renewable energy infrastructure applications.
48. The document sets out the assessment requirements for renewable energy infrastructure (including offshore wind energy) and also presents a range of technology specific information.

49. EN-3 reiterates the basic assessment principle as set out in EN-1 that the national need for energy infrastructure has already been demonstrated and acknowledges that offshore wind has the potential to form a considerable proportion of the UK's renewable energy generating capacity up to the year 2020 and beyond.
50. Policies specific to the process of EIA are presented within EN-3. These cover a range of topics which the decision-maker will give due regard to as part of the examination and determination process. EATL has accordingly undertaken a detailed assessment of the project's likely effects against a range of environmental topics, the findings of which are reported in the project ES which has been submitted with the DCO application.

2.2.3 National Policy Statement EN-5

51. In conjunction with EN-1, EN-5 provides the principal guidance for decision-making on nationally significant electricity network infrastructure.
52. It is expected that EN-5 will provide the primary guidance document for decision-making in relation to the onshore elements of the project as these will comprise of transmission and electrical network infrastructure only.
53. The document sets out a principle that generic impacts listed in EN-1 are likely to be applicable to electricity networks infrastructure and additionally identifies technology specific considerations such as Electric and Magnetic Fields (EMFs).
54. Due regard has been given by EATL to the environmental effects on the associated onshore project components as part of the EIA process. Volume 1 of the ES provides a detailed assessment of the impacts of the onshore elements of the project.

2.3 Marine Policy

55. The Marine and Coastal Access Act (MCAA) 2009 provides the legal mechanism to help ensure clean, healthy, safe, productive and biologically diverse oceans and seas by putting in place a new system for improved management and protection of the marine and coastal environment. The MCAA also established the Marine Management Organisation (MMO), the authority tasked with ensuring the delivery of sustainable development in the marine area.
56. The Marine Policy Statement (MPS) adopted by all UK administrations in March 2011 provides the policy framework for the preparation of marine plans, establishing how decisions affecting the marine area should be made in order to enable sustainable development. The MPS also provides an overview and summary of national policy relevant to marine planning and decision-making in the marine area. Marine plans

are intended to guide developments and activities to ensure maximisation of the economic worth of the marine area in a sustainable way.

57. The first Marine Plans include the East Inshore and East Offshore Marine Plans which were formally adopted on 2nd April 2014. The East Inshore Marine Plan area covers 6,000km² of sea, from mean high water springs out to the 12 nautical mile limit from Flamborough Head in the north to Felixstowe in the south. The East Offshore Marine Plan covers 49,000km² of area from the 12 nautical mile limit to the border with The Netherlands, Belgium and France.
58. Public authorities, including the MMO, must consider the adopted marine plan for all authorisations - "any approval, confirmation, consent, licence, permission or other authorisation (however described), whether special or general" (MCAA 2009, section 58 (6)) - or enforcement decisions that may affect the plan area, unless relevant considerations indicate otherwise. A relevant consideration includes whether or not an application relates to a NSIP as set out in the Planning Act 2008. Decision making in relation to NSIP projects in English waters should have regard to the appropriate marine policy document be it the MPS or an adopted marine plan.
59. The MPS acknowledges that sustainable, secure and affordable energy is central to the economic and social wellbeing of the UK, and identifies that marine planning is important in the contribution to securing the UK's energy objectives.
60. The document contains policies of specific relevance to the offshore components of the project that support renewable energy and acknowledges the beneficial environmental effects (e.g. air quality) that such developments can generate when compared to those associated with the use of fossil fuels.
61. The MPS recognises that marine sources of energy will play a key role in meeting national and international emissions targets, with offshore wind forming the largest single contribution.

2.4 National, Regional and Local Planning Policy

2.4.1 National Planning Policy Framework

62. In addition to NPSs, a policy hierarchy exists at the national, regional and local level that is of relevance to the onshore and offshore elements of the application. Such policy is considered potentially 'important' and 'relevant' to the decision-making process (DECC, 2011, National Policy Statement EN-1, pp.44).

63. The NPPF was published in March 2012, replacing the pre-existing hierarchy of PPSs and PPGs that formerly provided guidance on land-based planning and development control.
64. Although the NPPF does not contain specific policies for NSIPs, the document makes clear that NPSs form part of the overall framework of national planning policy.
65. The NPPF sets out the national position on the delivery of sustainable development through the planning process, and identifies a series of core principles covering the protection and conservation of the natural, built and historic environment, and the promotion of sustainable growth and development which are considered relevant to the project.
66. One of the core principles underpinning decision making in the NPPF relates to supporting the transition to a low carbon future in a changing climate by encouraging the use of renewable resources, for example by the development of renewable energy.

2.4.2 Regional Policy

67. The East of England Plan, published in May 2008, was the relevant Regional Spatial Strategy setting out the broad development strategy for the region. The East of England Plan was revoked on the 3rd January 2013.

2.4.3 Local Policy

68. Local authorities are required to prepare and maintain up to date Local Development Plans which set out their objectives for the use and land development within their jurisdiction, and general policies for implementation.
69. Prior to the Planning and Compulsory Purchase Act 2004, local planning policy was set out in a single document, the Local Plan. These are now being replaced by Local Development Frameworks (LDFs), which comprise a suite of Development Plan Documents (DPD) including a Core Strategy DPD, Site Allocations DPD, Area Action Plans and a Proposals Map. Taken together, the LDF can be thought of as the 'new' Local Plan. For the majority of local authorities these documents are still in development but where drafts are available, these have been considered.
70. The onshore cable route falls under the jurisdiction of Suffolk County Council and the following local authorities:
 - Mid Suffolk District Council (MSDC); and
 - Suffolk Coastal District Council (SCDC).

71. Both local authorities have in place a host of local planning documents of direct relevance to the project, as set out below in *Table 1*.

Table 1 Adopted Local Development Plans, Emerging Local Development Frameworks and Supplementary Planning Documents

Council	Planning Documents of Relevance
Suffolk County Council	<p>Planning policy is provided at the regional level and at the local district and borough levels.</p> <p>There is no county level planning policy that requires consideration for the proposed development.</p>
Mid Suffolk District Council	<p><u>Core Strategy DPD and Core Strategy Focused Review</u></p> <p>The Core Strategy Focused Review (CSFR) was adopted by the Council on the 20th of December 2012 and now forms part of the Mid Suffolk Core Strategy and the Mid Suffolk Development Plan. Relevant policies are:</p> <ul style="list-style-type: none"> • CS2 Development in the Countryside • CS3 Reduce Contribution to Climate Change • CS4 Adapting to Climate Change • CS5 Mid Suffolk’s Environment • FC3 Supply of Employment (replaces previous Core Strategy Policy CS11) <p><u>Mid Suffolk Local Plan</u></p> <p>Until such time as all Development Plan Documents within the Local Development Framework are completed and adopted, ‘saved’ policies from the Mid Suffolk Local Plan will continue to form part of the policy context for planning decisions.</p> <p>Relevant saved policies are:</p> <ul style="list-style-type: none"> • GP1: Design and Layout of Development • H16: Protecting Existing Residential Amenity • CL3: Major Utility Installations and Power Lines in the Countryside • CL5: Protecting Existing Woodland • CL6: Tree Preservation Order • CL8: Protecting Wildlife Habitats • CL11: Retaining High Quality Agricultural Land • CL12: The Effects Of Severance Upon Existing Farms • T10: Highway considerations in Development • SC4: Protection of Groundwater Supplies • SC5: Areas at Risk from Flooding
Suffolk Coastal District Council	<p><u>Suffolk Coastal District Local Plan - Core Strategy and Development Management Policies (2013)</u></p> <p>The Core Strategy and Development Management Policies document was formally adopted by the Council on 5 July 2013 and re-titled the Suffolk Coastal District Local Plan - Core Strategy and Development</p>

Council	Planning Documents of Relevance
	<p>Management Policies (Suffolk Coastal District Council. 2013). This means that the Core Strategy now forms part of the formal Development Plan for the district and will be used in the determination of planning applications.</p> <p>Relevant policies from the Suffolk Coastal District Local Plan are:</p> <ul style="list-style-type: none"> • SP 12 Climate Change • SP14: Biodiversity and Geodiversity • SP15: Landscape and Townscape • DM27: Biodiversity and Geodiversity <p><u>Previously adopted Local Plan (2007)</u></p> <p>In addition to the Core Strategy the Council will continue to have regard to the remaining 'saved' policies from the previously adopted Suffolk Coastal Local Plan until replacement by policies in other development plan documents.</p> <p>Saved policies from the previously adopted Suffolk Coastal Local Plan are:</p> <ul style="list-style-type: none"> • AP1: Conservation Area • AP4: Parks and Gardens of Historic or Landscape interest • AP13: Special Landscape Areas

72. The policies presented above are discussed in more detail below in *Table 2*.
73. In drafting their Local Impact Reports, the above local authorities may give regard to the compatibility between the project and the existing local planning framework. This in turn will be given due regard by the Planning Inspectorate and the Secretary of State as part of the decision-making process on the project.

Table 2 Relevant Policies

Policy	Summary	Policy Assessment
Policies from the Mid Suffolk Core Strategy DPD (Adopted 2008) and Core Strategy Focused Review		
Policy CS2 Development in the Countryside	Relates to development in the countryside and countryside villages and states that development will be restricted to defined categories including renewable energy projects.	The project is a renewable energy project and therefore accords with this policy.
Policy CS3 Reduce Contributions to Climate Change	Aims to reduce contributions to climate change by promoting and encouraging the appropriate development of standalone renewable energy schemes.	The project is a renewable energy project and therefore accords with this policy.
Policy CS4 Adapting to Climate	States that all development proposals will contribute to the delivery of sustainable development and reflects the need to plan	Flood risk, pollution and biodiversity have all been considered in the Environmental Statement and

Policy	Summary	Policy Assessment
Policies from the Mid Suffolk Core Strategy DPD (Adopted 2008) and Core Strategy Focused Review		
Change	<p>for climate change, through addressing its causes and potential impacts on the following:</p> <ul style="list-style-type: none"> • Flood Risk: The council will support development proposals that avoid areas of current and future flood risk, and which do not increase flooding elsewhere, adopting the precautionary principle to development proposals. • Pollution: To protect people and the environment from unsafe or unhealthy pollutants. Development that harms the quality of soil or air and / or causes noise, dust, odour or light pollution will be avoided wherever possible. Development proposals will have no adverse effect on water quality. • Biodiversity: Development must also seek to adapt for the anticipated negative impacts from climate change upon biodiversity by protecting the district's natural capital and applying an ecological network approach. 	<p>impacts have been addressed through the project design and mitigation proposed. The project therefore accords with this policy.</p>
Policy CS5 Mid Suffolk Environment	<p>Affords protection to the environment and states that all development will maintain and enhance the environment, including the historic environment, and retain the local distinctiveness of the area.</p> <p>To protect, manage and enhance Mid Suffolk's biodiversity and geodiversity based on a network of:</p> <ul style="list-style-type: none"> • Designated Sites (international, national, regional and local); • Biodiversity Action Plan Species and Habitats, geodiversity interests within the wider environment; and • Wildlife Corridors and Ecological Networks. <p>Where appropriate, increase opportunities for access and appreciation of biodiversity and geodiversity conservation for all sections of the community.</p>	<p>Biodiversity, geodiversity and designated sites have all been considered in the Environmental Statement and impacts have been addressed through the project design and mitigation proposed. The project therefore accords with this policy.</p>
FC3 (replaces previous Core Strategy Policy CS11)	<p>Relates to the employment land, stating that a range of good quality sites will be made available for employment land in all towns and at least some of the key service centres</p>	<p>The project will not impact the supply of employment land. The project therefore accords with this policy.</p>

Policy	Summary	Policy Assessment
Policies from the Mid Suffolk Core Strategy DPD (Adopted 2008) and Core Strategy Focused Review		
Supply of Employment Land	through support for upgrading existing sites where this is practicable. Policy FC3 also states that major new allocations of employment land should be situated primarily in or close to towns and key service centres with good access to the District's major transport routes and good access by public transport.	
Saved Policies from the Mid Suffolk Local Plan (1998)		
GP1 Design and Layout of Development	<p>The district planning authority will normally grant permission for proposals which meet the following design criteria:</p> <ul style="list-style-type: none"> Proposals should maintain or enhance the character and appearance of their surroundings, and respect the scale and density of surrounding development; Materials and finishes should be traditional, or compatible with traditional materials and finishes and should respect local architectural styles where appropriate; The siting of buildings and the creation of open spaces between existing and proposed buildings should maintain or enhance the character of the site, with attention to the treatment of boundaries particularly on the edge of settlements; Layouts should incorporate and protect important natural landscape features, including existing trees, shrubs and hedgerows; proposals should make proper provision for the garaging, parking and turning of motor vehicles and for footways and access in a manner that does not dominate the appearance and design of the layout; Landscaping should be regarded as an integral part of design proposals; and The interrelationship between buildings and open spaces in any layout should act to minimise opportunities for criminal activity, consistent with good layout and 	<p>The onshore cable route utilise pre-installed ducts installed during construction of the East Anglia ONE project.</p> <p>The design for the onshore substation compound has considered landscape and visual impacts and would include a landscaping scheme.</p> <p>The project therefore accords with this planning policy.</p>

Policy	Summary	Policy Assessment
Policies from the Mid Suffolk Core Strategy DPD (Adopted 2008) and Core Strategy Focused Review		
	architectural design.	
H16 Protect Existing Residential Amenity	<p>To protect the existing amenity and character of primarily residential areas, the district planning authority will refuse:</p> <ul style="list-style-type: none"> • Change to non-residential use where such a change would materially and detrimentally affect the character and amenity of the area by means of appearance, traffic generation, nuisance or safety; • The loss of open spaces which contribute to the character or appearance of an area and which are important for recreation or amenity purposes; and • Development that materially reduces the amenity and privacy of adjacent dwellings or erodes the character of the surrounding area. The cumulative effect of a series of proposals will be taken into account. 	<p>The onshore cable route utilises pre-installed ducts installed during construction of the East Anglia ONE project.</p> <p>The onshore substation compound is located adjacent to an existing substation and would not significantly impact the residential amenity of nearby properties.</p> <p>The project therefore accords with this planning policy.</p>
CL3 Major Utility Installations And Power Lines in the Countryside.	New major installations for utilities and power lines exceeding 33kv should be carefully sited to ensure minimal intrusion in the landscape. The feasibility of undergrounding electricity lines will be regarded as a material consideration.	EATL have committed to a buried electrical cable system and the substation compound has been sited next to an existing substation. The project therefore accords with this planning policy.
CL5 Protecting Existing Woodland	Development which would result in the loss of or damage to woodland, particularly ancient woodland, or disruption to commercial forestry will be refused. The felling of commercial conifer woodland will be supported where it does not adversely affect the character and appearance of the landscape.	The onshore cable route utilises pre-installed ducts installed during construction of the East Anglia ONE project. Routeing of the onshore cable route has sought to avoid woodland and where this has not been possible, EATL has committed to using Horizontal Directional Drilling to avoid impacts to woodland. The project therefore accords with this planning policy.
CL6 Tree Preservation Order	Tree preservation orders will be used where the removal of trees and woodlands would be detrimental to the visual amenity of the surrounding area.	No trees protected by a Tree Preservation Order will be impacted by the project. The project therefore accords with this planning policy.
CL8 Protecting Wildlife Habitats	The district planning authority will refuse development likely to bring about the loss or significant alteration of important habitats, or cause a threat to any rare, vulnerable or	Impacts to wildlife and habitats have been fully considered in the Environmental Statement and mitigation has been proposed to

Policy	Summary	Policy Assessment
Policies from the Mid Suffolk Core Strategy DPD (Adopted 2008) and Core Strategy Focused Review		
	protected species.	minimise the potential impacts identified. The project therefore accords with this planning policy.
CL11 Retaining High Quality Agricultural Land	The district planning authority will encourage the conservation of agricultural land. Particular protection will be afforded to the best and most versatile agricultural land (namely grades 1, 2 and 3a of the Agricultural Land Classification (ALC)).	Impacts to the best and most versatile agricultural land arising from the onshore cable route are only anticipated during the construction phase and are therefore temporary. The substation compound will permanently impact Grade 2 ALC, however the area affected is approximately 3.04ha and the substation compound is therefore considered to result in a moderate impact to best and most versatile agricultural land, significant only at a local level.
CL12 The Effects of Severance and Fragmentation Upon Existing Farms	In determining planning applications involving the development of existing agricultural land, the district planning authority will have regard to the effect of severance and fragmentation upon the farm and its operational structure	The effects of severance and fragmentation of farms has been considered in the Environmental Statement. The project therefore accords with this planning policy.
T10 Highways Considerations in Development.	When considering planning applications for development, the district planning authority will have regard to the following highway matters: <ul style="list-style-type: none"> • The provision of safe access to and egress from the site; • The suitability of existing roads giving access to the development, in terms of the safe and free flow of traffic and pedestrian safety; • Whether the amount and type of traffic generated by the proposal will be acceptable in relation to the capacity of the road network in the locality of the site; • The provision of adequate space for the parking and turning of cars and service vehicles within the curtilage of the site; and • Whether the needs of pedestrians and cyclists have been met, particularly in the design and layout of new housing and industrial areas. Cycle routes and cycle priority measures will be encouraged in new 	Potential impacts relating to traffic and transport have been considered in the ES. The project therefore accords with this planning policy.

Policy	Summary	Policy Assessment
Policies from the Mid Suffolk Core Strategy DPD (Adopted 2008) and Core Strategy Focused Review		
	development.	
SC4 Protection of Groundwater Supplies	In considering proposals for new development or changes of use, the district planning authority will resist significant damage to water aquifers and seek to minimise the risk of contamination of underground water resources.	The potential for impacts to groundwater has been considered in the Environmental Statement. The project therefore accords with this planning policy.
SC5 Areas at Risk From Flooding	States that development which is likely to impede the flow of flood water or increase the risk of flooding elsewhere will not be permitted unless suitable flood mitigation is put in place.	A flood risk assessment has been undertaken for the onshore electrical transmission works and is presented in the Environmental Statement. The project therefore accords with this planning policy.
Policies from the Suffolk Coastal District Council Local Plan - Core Strategy and Development Management Policies (2013)		
SP12 Climate Change	The District Council will contribute towards the mitigation of the effects of new development on climate change by: <ul style="list-style-type: none"> • Encouraging and promoting schemes which create renewable energy where consistent with the need to safeguard residential amenity, the environment and the landscape; • Minimising the risk of flooding and ensuring appropriate management of land within flood plains; and • Improving the process of estuary and coastal management, incorporating and integrating social, recreational, economic, physical and environmental issues and actions. 	The project is a renewable energy project and compliments these policies.
SP14 Biodiversity and Geodiversity	Biodiversity and geodiversity will be protected and enhanced using a framework based on a network of: <ul style="list-style-type: none"> • Designated sites; • Wildlife corridors and links; • The rivers, estuaries and coast; • Identified habitats and geodiversity features; • Landscape character areas; and • Protected species. 	Potential impacts to biodiversity and geodiversity have been considered in the Environmental Statement and mitigation has been proposed where required. The project therefore accords with this planning policy.
SP15 Landscape and Townscape	The policy of the Council will be to protect and enhance the various landscape character areas within the district either through opportunities linked to development or through other strategies.	The onshore cable route utilises pre-installed ducts installed during construction of the East Anglia ONE project. The project therefore accords with this planning policy.

Policy	Summary	Policy Assessment
Policies from the Mid Suffolk Core Strategy DPD (Adopted 2008) and Core Strategy Focused Review		
	The policy of the Council will be to protect and enhance the various landscape character areas within the district either through opportunities linked to development or through other strategies.	
DM27 Biodiversity and Geodiversity	<p>Development will not be permitted where there is an unacceptable impact on biodiversity and geodiversity having regard to the following:</p> <ul style="list-style-type: none"> • The status and designation of sites, habitats and species; • The need to avoid the loss and fragmentation of important sites and habitats; and • (The impact and effectiveness of any mitigation measures proposed to minimize and/or protect sites, habitats and species. Mitigation measures that encourage biodiversity will be looked upon favourably. 	Potential impacts to biodiversity and geodiversity have been considered in the Environmental Statement and mitigation has been proposed where required. The project therefore accords with this planning policy.
Saved Policies from the Suffolk Coastal District Local Plan (2007)		
AP1 Conservation Areas	To protect the character of the Conservation Areas and to ensure that new buildings, alterations or other development preserve or enhance them	No areas designated as Conservation Areas will be impacted. The project therefore accords with this planning policy.
AP4 Parks And Gardens of Historic or Landscape Interest.	The District Council will encourage the preservation and /or enhancement of parks and gardens of historic and landscape interest and their surroundings. Planning permission for any proposed development will not be granted if it would have a materially adverse impact on their character, features or immediate setting.	No areas designated as parks and gardens of historic or landscape interest will be impacted. The project therefore accords with this planning policy.
AP13 Special Landscape Areas	The valleys and tributaries of the Rivers Alde, Blyth, Deben, Fynn, Hundred, Mill, Minsmere, Ore and Yox, and the Parks and Gardens of Historic or Landscape Interest are designated as Special Landscape Areas. The District Council will ensure that no development will take place which would be to the material detriment of, or materially detract from, the special landscape quality.	The East Anglia THREE onshore cable route passes through areas designated as SLA, while the East Anglia THREE substation lies outwith the SLA designation. The magnitude of change on SLAs, and visual receptors would be low at the most. The impacts would be not significant.

3. ASSESSMENT OF POLICY COMPLIANCE

3.1 Strategic Need

74. EN-1 sets out the Government's position regarding the need to respond to the challenges of climate change and future energy security, clearly stating a need for significant change in the UK's energy infrastructure. It also identifies a range of energy infrastructure that the Government consider to be necessary to address these challenges.
75. The UK has substantial renewable energy resources. EN-1 states that offshore wind is expected to provide the largest single contribution towards the 2020 renewable energy generation targets.
76. EN-1 sets out electricity demand forecasts for the year 2025, stating that 59GW of demand will need to be delivered by new infrastructure. In order to meet renewable energy commitments, some 33GW of this has been identified as having to come from renewable sources such as offshore wind.
77. Through the strategic framework of EN-1, it has been demonstrated that there is a growing need and urgency for new infrastructure on a national scale. The NPPF makes clear that the planning process plays a pivotal role in securing radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.
78. The document states that the decision-maker should give substantial weight to the contribution that projects will make towards satisfying the need for new infrastructure when considering applications made under the Act.
79. Similar policies exist at the local level that support the development and use of renewable energy technologies.
80. EATL accordingly consider that the strategic need for the project has already been tested and accepted up to national level. Through the delivery of installed capacity of up to 1,200MW, it is considered that the project will make a positive contribution to meeting the UK's renewable energy commitments, assist in shifting economic reliance away from fossil fuels, and will help meet the UK's growing energy demands.

3.2 Marine Policy

81. It is considered that the matters set out in the MPS strongly align with those contained in the NPSs, specifically in relation to those matters which decision-

makers should be examining and taking account of in determining energy infrastructure applications. These include acknowledging the national need for energy infrastructure and the positive benefits associated with low carbon electricity generation.

82. EATL considers that the project is in general accordance with the objectives and policies set out in the MPS concerning the planning and development of offshore electricity generation in the marine environment.

3.3 Site Selection, Alternatives and Design Development

83. EN-3 identifies a number of factors that applicants are required to consider as part of the site selection process; these include a range of technical and economic considerations such as predicted wind speed, proximity to dwellings, access, and electricity grid network connectivity. Environmental factors of specific relevance to offshore wind energy developments are also set out on a topic by topic basis.
84. EN-5 similarly identifies a number of factors in relation to new electricity network infrastructure; these include the location of the existing network, land ownership, and environmental considerations such as noise, landscape and visual impact, and biodiversity.
85. In relation to the consideration of alternatives, EN-1 provides guidance on their relevance in the decision-making process, stating that potential alternatives should be identified prior to the making of any application wherever possible.
86. The design-development process for the project has accordingly taken account of various constraining factors in the region, and the project is considered by EATL to be of a suitable scale and located in an area which can be successfully developed for offshore wind energy. Full details of the site selection process undertaken by EATL, and the subsequent consideration of alternative designs, layouts and technologies, is set out in Chapter 4 Site Selection and Alternatives of the ES.
87. EN-1 acknowledges that connection to the electricity network is an important consideration for applicants wanting to construct or extend generation plant, stating a preference for related infrastructure to be contained in a single application. In preparing the draft DCO for submission to The Planning Inspectorate, EATL has applied for consent for both the offshore and onshore elements of the project. The EIA process has also considered the project as a single entity, in order to assess the impacts of the project as a whole to meet the requirements set out in EN-3.

88. Accordingly, EATL believe that the open and transparent process followed fully aligns with the requirements of relevant energy NPSs. EATL also consider that the process followed in arriving at the design and layout of the onshore project components accords with local policies that seek to achieve good design and environmental integration. Through appropriate landscaping and other mitigation, onshore infrastructure will meet the requirements of Policy CS2 and CS5 of the Mid Suffolk District Core Strategy DPD, Policy GP1 and CL3 of the Mid Suffolk District Local Plan and Policy SP15 of the Suffolk Coastal District Local Plan.

3.4 Topic Specific Assessment

89. EN-1 guides decision-making to start with a presumption in favour of granting consent for energy NSIPs, unless more specific and relevant policies clearly indicate that consent should be refused. EN-1 provides guidance within Part 5 of the document on generic impacts likely to apply to energy projects.
90. Part 2 of both EN-3 and EN-5 provide further topic specific guidance on the potential impacts of offshore windfarms and onshore electricity infrastructure respectively.
91. Collectively, these documents set out the extent of assessment expected of NSIP applicants and the primary basis on which judgements will be made as part of the decision-making process.
92. Full details of the policies and statements against which the project will be tested are set out in preceding sections of this Planning Statement. The following section assesses the overall compliance of the topics considered in the project EIA against the specific requirements of applicable NPSs and the wider policy framework, where considered relevant. The results of the assessment carried out in respect of these topics can be found in Volume 1 of the Environmental Statement.

3.4.1 Marine and Terrestrial Physical Environment

93. EN-3 sets out the ways in which offshore energy infrastructure can affect elements of the physical environment (including waves and tides, scour effect, sediment transport and suspended solids).
94. As part of the EIA process, EATL has undertaken a detailed assessment of the project to determine its environmental impacts on the receiving physical environment during the key stages of development (i.e. construction, operation and decommissioning). Full details of the EIA and potential impacts on the marine physical environment can be found in Chapter 7 Marine Geology, Oceanography and Physical Processes of the ES.

95. In meeting the requirements of EN-1 and EN-3, **negligible** impacts have been predicted on the sea bed, coastal environment or designated sites through the construction and decommissioning, with the potential for **minor adverse** impacts during operation of the East Anglia THREE project. Appropriate mitigation will be developed during the detailed design phase to address impacts of potential significance and minimise disturbance to the offshore physical environment.
96. Full details of the EIA and potential impacts on the terrestrial physical environment can be found in Chapter 19 Soils, Geology and Ground Condition of the ES. In meeting the requirements of EN-3, **negligible to minor adverse** significant impacts have been predicted on soil, geology and ground condition through construction, operation and decommissioning of the East Anglia THREE project.
97. Accordingly, it is considered that the project accords with policies set out in EN-1 and EN-3 in relation to this topic area.

3.4.2 Marine and Terrestrial Ornithology

98. EN-3 sets out the potential effects offshore energy infrastructure can have on ornithological interests (avian ecology). EATL has undertaken an assessment of the project's likely impacts on ornithology across all stages of development. This has included consideration issues including collision risk, habitat loss, and disturbance. Full details of the EIA and potential impacts on marine and terrestrial ornithology can be found in Chapter 13 Offshore Ornithology and Chapter 24 Onshore Ornithology of the ES.
99. In meeting the requirements of EN-3, **minor adverse** impacts from displacement and collision risk have been predicted on offshore ornithology during the construction and operation phase.
100. When considering the cumulative impact of the proposed East Anglia THREE project and other windfarm developments, the risk to birds from cumulative collisions with wind turbines is assessed as no greater than **minor adverse** for all species with the exception of kittiwake, for which a **minor to moderate adverse** impact is predicted.
101. Considering terrestrial ornithology, avoidance and mitigation measures have been embedded through project design. This includes particular measures during the construction stage to avoid or mitigate impacts on breeding Cetti's warbler and marsh harrier and non-breeding brent goose, avocet and other waterbirds.

102. No impacts were identified of greater than **minor adverse** significance. Those identified impacts occurred to marsh harrier, brent goose and the other wildfowl and waders and related primarily to disturbance / displacement effects.
103. No cumulative impacts were identified of greater than **minor adverse** significance. Those identified cumulative impacts of minor significance were due to the proposed East Anglia THREE project with East Anglia ONE and a future East Anglia project and occurred as a result of the construction phase.
104. EATL also consider that the project would accord with relevant local policy concerning the protection of wildlife and habitats as outlined in Chapter 13 Offshore Ornithology and Chapter 24 Onshore Ornithology of the ES.

3.4.3 Terrestrial and Marine Ecology

105. The national policy position acknowledges the wide range of legislative provisions that exist at the national and international level which seek to protect and conserve terrestrial and marine based species and habitats.
106. The EIA has recorded that the principal impacts will derive from the construction of the onshore and offshore project components. Considerable effort has been directed into minimising potential impacts on ecological resources and receptors through careful design and avoidance of designated sites through micro-siting.
107. Full details of the EIA and potential impacts on marine ecology can be found in Chapter 10 Benthic Ecology, Chapter 11 Fish and Shellfish Ecology and Chapter 12 Marine Ecology of the ES.
108. With regard to benthic ecology, the effects of the proposed project would mostly be temporary, small scale and localised and are anticipated to result in impacts of **negligible** or **minor adverse** significance. No additional mitigation measures, other than those which form part of the embedded mitigation, are suggested. Micro-siting of foundations and cables would be employed in accordance with the marine licence to avoid Habitats of Principal Importance as far as is practicable.
109. At a project level the impacts from the proposed East Anglia THREE project on marine mammals are assessed as **negligible** with the exception of construction stage impacts upon harbour porpoise which are **minor adverse** at worst. There are potential significant cumulative impacts from underwater noise (largely from offshore windfarms) upon harbour porpoise. However, it should be noted that the contribution of the proposed East Anglia THREE project to this cumulative impact is

very small due to the very low density of harbour porpoise in the East Anglia THREE site and offshore cable corridor.

110. Impacts on fish and shellfish ecology are anticipated to be **negligible** or **minor adverse** and localised, small scale and temporary in nature.
111. For terrestrial ecology, **no impacts** are predicted to any designated sites with the exception of noise disturbance to invertebrates as through careful site selection avoiding most designated sites and the use of HDD by East Anglia ONE to pre-install ducts for the proposed East Anglia THREE project. **No impacts** are predicted to these sites with the exception of temporary noise disturbance to invertebrates found within them.
112. For coastal habitats, direct habitat loss during the cable installation would lead to a **moderate adverse** impact on cliffs and slopes in the immediate vicinity of the landfall. **Moderate adverse** impacts upon notable plants in discrete locations along the onshore cable route were predicted under a Two Phased approach for construction. With mitigation measures and given the temporary, local nature of this impact, EATL consider that the project does accord with national and local policy.
113. With the exception of the impacts described in the paragraphs above no impacts during construction on terrestrial ecology were considered to result in more than a **minor adverse** impact. Appropriate post-construction monitoring programmes for affected species (such as bats and Great Crested Newt) will be agreed with relevant bodies and organisations.
114. EATL accordingly consider that impacts of the project avoid causing "significant harm" to non-avian ecology, a key test set out in EN-1, thus complying with and satisfying national policy.
115. EATL also consider the project accords with local policy, specifically Policy CS5 of the Mid Suffolk District Core Strategy DPD, CL8 of the Mid Suffolk District Local Plan and Policy SP14 of the Suffolk Coastal District Local Plan, as the project will not result in a significant loss or alteration to habitats or threaten protected species.

3.4.4 Water Quality and Ground Conditions

116. EN-1 contains a series of generic impacts associated with water and hydrological resources, noting the potential for energy NSIPs to generate adverse effects on the water environment and coastal waters. No specific mention is given in the document to ground conditions.

117. No significant impacts on marine water and sediment quality have been identified in the assessment, and through the implementation of the embedded mitigation, all potential impacts are considered to be **negligible**. Full details of the EIA and potential impacts can be found in Chapter 8 Marine Water and Sediment of the ES.
118. Due to the integration of appropriate mitigation into the design of the onshore project components, no significant impacts in respect of flooding were recorded. In addition, **no significant impacts** were identified on existing surface water quality and hydrological regimes with only a short term **minor adverse** impact on groundwater quality. Full details of the EIA and potential impacts can be found in Chapter 21 Water Resources and Flood Risk of the ES.
119. EATL accordingly consider that the outcomes of the EIA process confirm compatibility with water policies contained in EN-1.

3.4.5 Air Quality

120. EN-1 contains policy addressing air quality and dust; other energy NPSs make no specific reference to the topic.
121. Due to embedded mitigation measures and the following of Institute of Air Quality Management best practice guidance during construction, the EIA process concluded there will be **negligible** significant impacts during the construction, operation and decommissioning phases of the onshore project components. Full details of the EIA process can be found in Chapter 20 Air Quality of the ES.
122. It is therefore considered that the East Anglia THREE project is in accordance with national and local policy.

3.4.6 Land Use and Amenity

123. EN-1 requires applicants to identify existing and proposed land uses potentially affected by the project and consider its potential effects. Full details of the EIA and potential impacts can be found in Chapter 22 Land Use of the ES.
124. The onshore electrical transmission works including access would cross land in agricultural use. This land is predominantly of low agricultural land classification grade (between grades 2 and 3), with the substation(s) located in grade 2 land.
125. Due to embedded mitigation **no significant impacts** are predicted to land take, Environmental Stewardship Schemes or land drains during construction or operation. Following adherence to Code of Construction Practice, **no significant impacts** are predicted to soils as a result of the proposed East Anglia THREE project.

126. There will be impacts on amenity during construction through the temporary closure and diversion of a number of public rights of way (PRoW). PRoW will be temporarily closed or diversions put in place if necessary, avoiding disturbance to users and avoiding any significant impacts.
127. A **moderate adverse** impact was predicted at the local level for the construction and operation of the substation(s), since it would result in permanent land take, however, this is not significant at the county scale.
128. No impacts during operation were considered to result in more than a **minor adverse** impact.
129. Accordingly, EATL consider that the project is in general accordance with EN-1. EATL also consider the onshore project components will comply with policies concerning land use and the protection of amenity.

3.4.7 Landscape, Seascape and Visual Amenity

130. Within national policy, landscape and visual amenity interests are identified within EN-1, EN-3 and EN-5. Policy within these documents requires an assessment of potential effects in line with accepted guidance.
131. EN-1 acknowledges that virtually all energy NSIPs will render effects on the landscape. The design of the onshore and offshore project components has accordingly taken account of the potential effect on the receiving landscape and seascape environment.
132. Due to the nature and location of the receiving environment, EATL undertook extensive consultation as part of the EIA process to identify and understand existing landscape and visual relationships and sensitivities including designated areas of acknowledged value and quality. Full details of the EIA and potential impacts can be found in Chapter 29 Seascape, Landscape and Visual Amenity of the ES.
133. Embedded mitigation has reduced significant impacts in many aspects of the proposed project. Careful site selection for the landfall location and substation, and sensitive routing of the onshore cable route at the design stage has ensured that especially sensitive landscapes and landscape features have largely been avoided. It has also ensured that existing landscape features, such as the existing woodland around the substation, have been used to best effect, as well as providing for additional planting which will supplement the existing and collectively screen almost every aspect of the substation.

134. The majority of the landscape and visual receptors assessed would experience effects which would be **not significant**. Where significant impacts would arise, they would typically be short term, localised and reversible. Potential long term impacts relating to the substation would be reduced to medium term by the effects of mitigation planting. These impacts would also be localised and reversible.
135. As the project includes embedded mitigation and targeted landscape mitigation, EATL contends that the project complies with national policy and local policies that seek to protect and/or enhance residential amenity, local character, and features and elements within the countryside.

3.4.8 Marine and Terrestrial Historic Environment

136. EN-1 and EN-3 acknowledge that energy infrastructure holds potential to generate adverse effects on assets within the onshore and offshore historic environment respectively.
137. EN-3 states that the decision-maker needs to be satisfied that development of the type proposed (including associated infrastructure) has been designed sensitivity, taking account of known heritage assets. Accordingly, EATL has undertaken detailed assessments as part of the EIA to identify the potential impacts of the project on archaeology and built heritage. Full details of the EIA and potential impacts can be found in Chapter 17 Offshore Archaeology and Chapter 25 Onshore Archaeology of the ES.
138. During construction, operation and decommissioning, impacts upon known offshore archaeological receptors will be avoided due to appropriate mitigation or avoidance and will therefore be of **negligible** significance. There is potential for impacts to potential archaeological receptors (i.e. those as yet unidentified), however, the significance of any effects can be reduced by adherence to appropriate mitigation strategies.
139. It is anticipated that the majority of the potential disturbance of onshore buried archaeological remains will occur during the onshore works for East Anglia ONE with only minimal further groundworks required for East Anglia THREE beyond the already disturbed footprint.
140. The proposed East Anglia THREE project would commit to a written scheme of investigation (WSI) in line with that proposed for the East Anglia ONE project. This embedded mitigation strategy would ensure that any intrusive groundworks beyond the already disturbed footprint would be identified with all identified heritage assets either preserved in situ or subject to preservation by record through an appropriate

scheme of archaeological recording. This would result in impacts of **minor adverse** or **negligible** significance.

141. In light of these conclusions, EATL consider that the decision to grant the DCO for the project would accord with historic environment policies set out in the relevant NPSs.
142. As the project will not result in any significant adverse impacts on known assets within the historic environment, EATL consider the project to be in compliance with relevant local policy that seeks to protect the physical and visual qualities of archaeology and built heritage.

3.4.9 Marine and Terrestrial Electromagnetic Fields (EMF)

143. EN-1 sets out the national position with regard to EMFs associated with energy NSIPs. EN-5 explains how EMFs arise from generation, transmission, distribution and use of electricity. It is acknowledged that national policy concerning EMFs is mainly directed towards that associated with onshore overhead power cables. Full details of the potential impacts of EMFs can be found in Chapter 9 Underwater Noise and Electromagnetic Fields and Chapter 22 Land Use of the ES.
144. The marine ecological significance of the predicted EMFs has been assessed using available literature. **No impacts** are expected on marine mammals. Marine invertebrates may be affected by B-fields but any effects are expected to be largely negated by burial, therefore **negligible** impact. Elasmobranchs have been highlighted as potentially vulnerable taxa owing to their acute sensitivity to EMFs. Potential avoidance zones have been calculated and suggest that significant avoidance reactions are unlikely to occur. Impacts on fish and shellfish species are considered **negligible** or **minor adverse**.
145. The potential effects arising from EMF of the onshore cables during operation were considered, and the embedded mitigation within the design of the cables and cable installation process are considered to reduce any potential impacts to **negligible**.
146. EATL therefore consider the project to accord with national policy concerning EMFs.

3.4.10 Underwater and Terrestrial Noise and Vibration

147. EN-1 makes specific reference to noise and vibration, and EN-3 notes the potential effect of offshore windfarm noise associated with land-based activities and traffic, and on ecological receptors such as fish and marine mammals. EN-5 highlights the potential for noise to be generated by electricity transmission infrastructure such as substations.

148. Relevant NPS policy requires an assessment of noise and vibration, in accordance with relevant methodologies. As part of the EIA process, EATL undertook onshore and offshore assessments for the project for all key stages in the development process.
149. Underwater noise and vibration has been assessed in Chapter 9 Underwater Noise and Electromagnetic Fields, Chapter 10 Benthic Ecology, Chapter 11 Fish and Shellfish Ecology and Chapter 12 Marine Ecology of the ES. Each assessment was undertaken in accordance with EN-1 and EN-3.
150. From an onshore perspective, the EIA identified some potentially significant impacts, however by following the implementation of standard mitigation measures these levels can be reduced to **negligible** significance during construction and operation.
151. EATL anticipate that the decision-maker can be satisfied by the evidence presented in the EIA that the project accords with noise policy at the national level.

3.4.11 Transportation

152. The generic requirements for the assessment of effects arising from traffic and transport associated with all stages of an energy NSIP are set out in EN-1. Specific reference is made to these matters within EN-3 in relation to offshore wind.
153. As part of the EIA, EATL undertook an assessment of the impacts on the existing traffic and transport context associated with the onshore project components; this considered a number of factors such as accessibility, severance, safety and driver delay in line with established national guidance and methodologies. Full details of the assessment can be found in Chapter 27 Traffic and Transport of the ES.
154. The assessment concluded no residual significant impact was identified, with all impacts being of either **minor adverse** or **negligible** levels. EATL would manage the traffic impacts through embedded mitigation which would be implemented through a Traffic Management Plan and Travel Plan post-consent. **No significant impacts** were identified for the operational phase.
155. Accordingly, the decision-maker can be satisfied that there are no major conflicts with national policy. They can also be satisfied that policy considerations at the local level, such as those set out in Policy T10 of the Mid Suffolk District Local Plan, will be met by the project.

3.4.12 Commercial Fisheries

156. The potential impacts of offshore windfarms on commercial fisheries are presented in EN-3, which states that the construction and operation of offshore windfarms can have positive and negative effects on fish and shellfish stocks.
157. As part of the EIA, EATL undertook an assessment to determine the impacts of the project on commercial fishery interests. Specific consideration was given in the EIA to aspects including safety, access, interference and impacts on commercially exploited species. Full details of the assessment and the potential impacts can be found in Chapter 14 Commercial Fisheries of the ES.
158. For the East Anglia THREE site there are no significant impacts predicted as closure of the site will be localised to areas of active construction and the site will be open to fisheries during operation. UK vessels operating static gear are the only receptors which may sustain significant impacts and then only during the construction phase, in relation to installation of the offshore export cable. If necessary appropriate mitigation would be decided through the Commercial Fisheries Working Group. Therefore, the residual impact is reduced to **minor adverse**. Other impacts are assessed to be at worst, **minor adverse**, and as such no further significant impacts are expected to result from any phase of the proposed East Anglia THREE project.
159. EATL consider that a decision to grant the DCO for the project would fully accord with commercial fisheries policies set out in EN-3.

3.4.13 Navigation and Shipping

160. EN-3 requires applicants to undertake a Navigational Risk Assessment in accordance with relevant Government guidance. EN-3 requires applicants to consider impact on recreational craft. EN-3 states that where there is a possibility that safety zones will be sought around offshore infrastructure, potential effects should be assessed based on a worst case scenario where the exact locations of the safety zones are unknown.
161. In line with EN-3, within Chapter 15 Shipping and Navigation of the ES, a risk based assessment has been carried out supported by the Navigation Risk Assessment presented in *Appendix 15.1* of the ES.
162. The southern North Sea is an area of significant shipping and navigation activity. Shipping activity in the East Anglia Zone includes the passage of merchant vessels, ferries, fishing vessels, recreational craft, military vessels, and vessels engaged on specialist operations such as aggregate dredgers.

163. Following consideration of the outputs of the hazard workshop, desk top assessments and modelling, six different receptors were identified within Chapter 15 Shipping and Navigation that had the potential to be impacted by the development of the proposed East Anglia THREE project. The assessment identifies suitable mitigation for each impact during each phase of the proposed project lifetime to ensure that these are reduced to acceptable levels.
164. Overall, given the separation distance from Rounds 1 and 2 windfarms and consideration of cumulative routeing with regards to other Round 3 zones cumulative impacts are considered to be broadly acceptable for the East Anglia THREE site and therefore within “as low as reasonably practicable “(ALARP) parameters and **no residual impacts**.
165. EATL consider that a decision to grant the DCO for the project would fully accord with shipping and navigation policies set out in EN-3.

3.4.14 Socio Economics

166. NPS EN-3 indicates that the construction, operation and decommissioning of energy infrastructure may have socio-economic impacts at local and regional levels, which may include the creation of jobs and training opportunities, effects on tourism, the impact of a changing influx of workers and cumulative impacts if a DCO were to be granted for a number of projects within a region in a similar timeframe.
167. Details of the assessment that has been carried out for the East Anglia THREE project can be found in Chapter 28 Socio-economics of the ES.
168. The assessment concludes that the proposed East Anglia THREE project would provide a **moderate temporary beneficial** impact for offshore construction and a **minor temporary beneficial** impact for the onshore construction. The operation and maintenance phase is likely to provide a minor ongoing beneficial impact.
169. **No significant impacts** on tourism and recreation are predicted as a result of the proposed East Anglia THREE project, either offshore or onshore. Tourism and recreation receptors will experience minimal visual impacts and only temporary physical obstruction, noise and traffic impacts.
170. EATL consider that a decision to grant the DCO for the project would fully accord with socio-economic considerations set out in EN-3.

3.4.15 Infrastructure and Other Users

171. In respect of other infrastructure and users, EN-3 sets out policies relevant to oil and gas as well as other offshore infrastructure activities.

172. In accordance with EN-3, EATL has undertaken an assessment of marine human activities as part of the EIA process. Full details of the assessment can be found in Chapter 18 Infrastructure and Other Users of the ES. The assessment identified other windfarm developments, existing cables and pipelines, oil and gas activities, military practice areas and unexploded ordnance.
173. Impacts would largely be avoided as there is a requirement for industries to cooperate and operate in a safe manner. For instance, EATL will be required to undertake crossing agreements with operators of other cables and pipelines to ensure that these crossings are made safely and without damage to other infrastructure. It is therefore predicted that there will be **minor adverse to negligible** impacts upon other users.
174. No significant impacts were identified by EATL in respect of infrastructure or human activities within the offshore environment; accordingly it is considered that the decision-maker can be satisfied with the outcomes of the assessment in respect of compatibility between the project and EN-3.

4. CONCLUSIONS

4.1 The Planning Balance

175. In determining applications for nationally significant energy projects of the type proposed by EATL, the wider benefits of offshore wind energy must be reviewed against local issues and concerns. This balancing exercise must also consider the context of national, UK and European policies and obligations that seek to tackle climate change, deliver security of the UK's energy supply, and promote a shift to renewable energy.
176. The fundamental test to be applied in the decision-making process is whether, on balance, the project is in accordance with the relevant NPSs (except to the extent that one or more of the matters set out in Section 104(4) to 104(8) applies).
177. This Planning Statement has accordingly drawn together the pertinent strands of information to aid decision-makers in their determination of the extent to which the project accords with relevant planning policy, referencing the outcomes of environmental and other assessments reported elsewhere in the DCO application
178. It is clear from the policy appraisal and assessment that the application accords with EN-1, EN-3 and EN-5. EATL considers that the offshore elements of the project are consistent with planning policy concerning renewable energy in the marine environment and further considers that the onshore components of the project are consistent with development plan policies at the local level.
179. In reaching its judgement, EATL has assessed the policy context relating to a range of topics and interests (as set out in the NPSs and other relevant national and local policies) against the findings of the EIA process undertaken for the project.
180. Through application of policy tests, EATL has concluded there to be no adverse impacts or other material factors that outweigh the benefits of their proposal. Given the clear presumption in favour of the type of development proposed, and in light of all planning considerations presented in this statement, EATL considers that development consent should be granted subject to the requirements set out in the draft DCO.

Document 8.2 Ends Here