

East Anglia THREE
Offshore Windfarm

East Anglia THREE

Draft Statement of Common Ground

Suffolk Preservation Society

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SoCG/Suffolk Preservation Society and Applicant

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Table of contents

| | | |
|----------|---|----------|
| 1 | Introduction | 2 |
| 1.1 | Introduction | 2 |
| 1.2 | The Development | 2 |
| 1.3 | Consultation with the Suffolk Preservation Society | 3 |
| 1.3.1 | Pre-Application | 3 |
| 1.3.2 | Post-Application | 3 |
| 2 | Agreement Log | 4 |
| 2.1 | Onshore Archaeology and Cultural Heritage | 4 |
| 2.2 | Seascape, Landscape and Visual Amenity | 1 |
| | Appendix 1 SPS response to Phase III consultation | 2 |
| | Appendix 2 Reply letter to Relevant Representation | 3 |

1 Introduction

1.1 Introduction

1. This Statement of Common Ground (SoCG) has been prepared with Suffolk Preservation Society (SPS) to show where agreement has been reached with East Anglia THREE Limited (EATL) during the pre and post Development Consent Order (DCO) application consultation.
2. This SoCG comprises an agreement log which has been structured to reflect topics of interest to SPS on the East Anglia THREE DCO Application (the **Application**). Matters agreed, matters still to be agreed and actions to resolve matters are included.
3. The position with respect to each relevant issue is presented in a tabular form.

1.2 The Development

4. The Application is for development consent to construct and operate up to 172 wind turbine generators and associated infrastructure, with an installed capacity of up to 1,200 MW (the Project). The DCO, if made, would be known as the East Anglia THREE Offshore Wind Farm Order and would, amongst other things, authorise:
 - Up to 172 offshore wind turbines and associated foundations, with an installed capacity of up to 1,200 MW;
 - Up to two meteorological masts and foundations;
 - Up to twelve buoys;
 - Up to six offshore electrical stations;
 - Up to one offshore platform housing accommodation facilities;
 - Subsea inter-array cables between the wind turbines and offshore electrical stations;
 - Up to four subsea export cables to transmit electricity from the offshore electrical stations to shore;
 - Up to four interconnector cables between the East Anglia ONE and East Anglia THREE Projects;
 - Scour protection around foundations and on inter-array and export cables as required;
 - Landfall at Bawdsey with onshore transition bays to join the offshore and onshore cables;
 - Up to four onshore underground circuits (each containing up to three cables) pulled through existing ducting to be laid by East Anglia ONE or directly laid, running for approximately 37 km from landfall to the connection point at Bramford, Suffolk, with jointing pits, to transmit electricity to up to two new onshore substations;
 - Up to two onshore substations at Bramford, Suffolk, to connect the offshore wind farm to the National Grid;
 - The permanent and / or temporary compulsory acquisition (if required) of land and / or rights for the proposed Project;
 - Overriding of easements and other rights over or affecting land for the proposed Project;

- The application and / or disapplication of legislation relevant to the proposed Project including inter alia legislation relating to compulsory purchase; and
- Such ancillary, incidental and consequential provisions, permits or consents as are necessary and / or convenient.

5. The Application was submitted to the Planning Inspectorate on 18th November 2015 and accepted for examination on 15th December 2015.

1.3 Consultation with the Suffolk Preservation Society

6. This section briefly summarises the consultation that EATL has had with SPS; for further information on the consultation process and the outcome of consultations please see the Consultation Report (document 5.2 of the DCO Application).

1.3.1 Pre-Application

7. EATL engaged with SPS on the Project during the pre-application process through consultation carried out pursuant to section 42 and section 47 of the Planning Act 2008.

8. During formal consultation, SPS provided comments on the Phase III consultation in 2015 by way of letter dated 14th July 2015 (the **Consultation Response**). This letter is attached at Appendix 1.

1.3.2 Post-Application

SPS made a relevant representation to the Planning Inspectorate on 11th April 2016 (the **Relevant Representation**). EATL has replied to each point raised in the Relevant Representation by way of a letter (Appendix 2).

2 Agreement Log

9. Within the sections below the different topics for areas of agreement between SPS and EATL are set out.

2.1 Onshore Archaeology and Cultural Heritage

10. The Project has the potential to impact upon Onshore Archaeology and Cultural Heritage. Chapter 25 of the East Anglia THREE Environmental Statement (ES) (document 6.1.25 of the DCO Application) provides an assessment of the significance of these impacts. Table 1 below provides areas of common ground that have been reached regarding the findings reported within that chapter.

Table 1. SoCG – Onshore Archaeology and Cultural Heritage

| Topic | EATL Position | SPS Position | Final Position |
|------------------------|---|--|----------------|
| EIA | | | |
| Existing environment | The description of baseline conditions is accurate in terms of the Onshore Archaeology and Cultural Heritage that exists within the Order Limits and surrounding area. | TBC | |
| Methodology | The methodology used in the assessment is appropriate as it accords to the correct guidance; principally that set out in the updated GLVIA 3 as well as a number of other documents (Section 29.5.1 of the ES). See Appendix 2 to this SoCG for further detail on EATL's position | The SPS has strong reservations about the adequacy of the assessment, in particular during the operational period. The methodology used has failed to provide a clear and accessible narrative account of how the significance of the heritage assets' setting will be affected and how the development will reduce or enhance that significance. The Barnwell Court of Appeal judgment makes clear that considerable importance and non-discretionary weight must be given to the issue of setting including that of lower grade buildings. | |
| Assessment conclusions | The embedded mitigation strategy at the substation including its location to gain maximum benefit from existing screening (in particular that provided by the existing areas of Ancient Woodland) and the further proposed mitigation including planting to the south-west, north and east of the substation to provide further screening significantly mitigates impacts to the setting of designated heritage assets. | The SPS has concern that the Converter Station will have significant impacts on the setting of designated heritage assets together with future projects. This area is rich in cultural heritage, characterised by numerous medieval rural settlements and any further industrialising effect, in particular the Converter Station, will undoubtedly result in harm to their setting. These villages rely upon their agricultural setting as part of their intrinsic historic significance. | |

2.2 Seascape, Landscape and Visual Amenity

11. The Project has the potential to impact upon Seascape, Landscape and Visual Amenity. Chapter 29 of the ES (document 6.1.29 of the DCO Application) provides an assessment of the significance of these impacts. In addition, management and mitigation measures are provided within the Outline Landscape and Environmental Management Strategy (OLEMS) (document 8.6 of the DCO Application). Table 2 below provides areas of common ground that have been reached regarding the findings reported within that chapter.

Table 2. SoCG - Seascape, Landscape and Visual Amenity

| Topic | EATL Position | SPS Position | Final Position |
|------------------------|--|--|----------------|
| EIA | | | |
| Existing Environment | The description of baseline conditions is accurate in terms of the Onshore Archaeology and Cultural Heritage that exists within the Order Limits and surrounding area. | | |
| Assessment Methodology | All receptors within the study area have been assessed, with those with potential to be significantly affected being assessed in detail. This process has highlighted which receptors will be significantly affected. It is not possible to fully mitigate all landscape and visual effects. The mitigation measures, which have recently been refined, mitigate the majority of the significant effects although this will occur gradually over the approximate 20 year period it will take for the planting to mature. | The SPS does not consider the landscape impacts of the scheme have been fully identified. | |
| Assessment conclusions | Given the embedded mitigation the conclusion of the assessment is accurate and correct. See Appendix 2 of this SoCG for further information. | The landscape and visual impacts have been underestimated. Currently, apart from identifying that the Converter Station will be uncharacteristically large and thereby dominant in the landscape, very little further detail has been provided, including any detailed design or proposed mitigation. It is unclear how this installation will interact in terms of siting, scale and massing with the other buildings being proposed under East Anglia One or later phases. | |
| | As sensitivity is assessed as a combination of the value of the receptor with the susceptibility of the receptor to the proposed development, it is the susceptibility that will inevitably be reduced. The addition of a further development to a situation in which other similar developments already define the baseline, will make the receptors less | The cumulative adverse impacts of the project together with existing and future development have not been given adequate weight. In particular the SPS rejects the assumption that if a setting is already harmed by existing infrastructure this renders the setting less sensitive to further change. The SPS considers that a | |

| Topic | EATL Position | SPS Position | Final Position |
|----------------------------|---|--|----------------|
| | susceptible than if there were no other developments in this location. | compromised landscape or setting is more sensitive to harm, not less. | |
| Management measures | | | |
| | <p>The proposed mitigation is appropriate. It comprises extensive woodland planting that has been designed to mitigate the visual effects from the key visual receptors of the nearby settlements.</p> <p>The design principles from East Anglia ONE are still applicable and the refinement has taken place through the detailed design of the mitigation works, which has been based on these principles (see Appendix 2 of this SoCG for further detail)</p> | <p>The SPS considers that the proposed mitigation is inadequate and should be informed by a strategy for effective landscape planting with provision for substantial planting off site, taking into account the inevitable decline in the regions existing tree and hedge scape.</p> <p>The Design and Access statement remains very superficial. To state that the design principles previously agreed during East Anglia One are equally applicable in this case is unacceptable and requires refinement to make them more fit for purpose.</p> <p>An environmental fund to compensate (in part) those that will be impacted and disrupted during the life of this project should be provided.</p> | |

Signing box: The undersigned agreed to the provisions within this SoCG – Suffolk Preservation Society

| | |
|--------------|--|
| Signed | |
| Printed Name | |
| Position | |
| On behalf of | |
| Date | |

Signing box: The undersigned agreed to the provisions within this SoCG – EATL

| | |
|--------------|--|
| Signed | |
| Printed Name | |
| Position | |
| On behalf of | |
| Date | |

Appendix 1 SPS response to Phase III consultation

This will be included in the final version

Appendix 2 Reply letter to Relevant Representation

This will be included in the final version

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