

East Anglia THREE
Offshore Windfarm

East Anglia THREE

Applicant's Comments on the Local Impact Report

Document Reference – Deadline 3 / Applicant's
Comments / LIR

Author – Royal HaskoningDHV
East Anglia THREE Limited
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1 Applicant's comments on the joint Local Impact Report

1. This document contains the Applicant's comments on the joint Local Impact Report (LIR) of Suffolk County Council (SCC), Mid Suffolk District Council (MSDC) and Suffolk Coastal District Council (SCDC) submitted to the East Anglia THREE examination.

REF	Comment
5.6	The Principle Of The Development The DCO adequately describes the development which it proposes to authorise.
Applicant's response	Noted
6.5	Air Quality And Emissions It is not anticipated that there will be any significant localised impacts on air quality associated with HGV movements and the relevant local guidance will be complied with. Requirement 22 of the DCO provides for the production of a Code of Construction Practice (CoCP). Consequently, the local authorities are satisfied that any impacts on air quality can be adequately controlled. The project therefore complies with local policy.
Applicant's response	Noted
7.8	Biodiversity And Geological Conservation Skylarks aside, the local authorities are content that the ecological impacts of the development can be controlled to an acceptable level through the existing provisions in the DCO, namely compliance with Requirements 21, 22 and 23.
Applicant's response	The Applicant is working with the local authorities to resolve the outstanding concern on skylarks.
8.6	Coastal Change The proposals adequately respond to the local policy context.
Applicant's response	Noted
9.5	Flood Risk Requirements 18 and 22 provide for surface water drainage plans to be submitted to the local planning authority in accordance with the Outline Code of Construction Practice submitted with the application. These mechanisms should adequately control flood risk. The development complies with

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	local policy in this respect.
Applicant's response	Noted
10.7	<p>Historic Environment</p> <p>The impact of any remaining onshore archaeological heritage assets that have not already been evaluated via the implementation of the East Anglia ONE project is controlled by DCO Requirement 20 and the Outline Written Statement of Investigation (WSI). The local authorities are therefore satisfied that this provides for sufficient safeguards, though the WSI will need to be updated in the terms outlined above</p>
Applicant's response	Noted
11.15, 11.16	<p>Landscape And Visual</p> <p>The one outstanding issue thus remains the revision to the Landscape and Visual Assessment to reflect an adjusted baseline condition which reflects the current proposals for the East Anglia ONE substation. The local authorities will comment on this in due course.</p> <p>Subject to a satisfactory revised LVIA, it is currently envisaged that DCO Requirements 14 and 15, in combination with the Design Principles set out in the Design and Access Statement and the pre-existing Section 106/Section 111 agreement will be sufficient to control the landscape and visual impacts to a level which would provide compliance with the relevant local policies.</p>
Applicant's response	The Applicant welcomes the local authorities' confirmation that subject to any comments on the revised LVIA they are satisfied that draft Order Requirements 14 and 15, in combination with the Design Principles set out in the Design and Access Statement (Document reference: 8.3 Design and Access Statment)and the pre-existing Section 106/Section 111 agreement for East Anglia ONE (Document reference: Deadline 2/First Written Questions/EAONE S111/106 Agreement/ LH10) will be sufficient to mitigate the landscape and visual impacts
12.12	<p>Land use Including Open Space And Green Infrastructure</p> <p>Overall the development complies with the relevant local plan policies.</p>
Applicant's response	Noted
13.5	<p>Noise And Vibration</p> <p>DCO Requirements 24, 25 and 26 provide for the control of</p>

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	noise during construction and the subsequent operation of the development. Consequently, the local authorities are satisfied that any impacts can be adequately controlled. The project therefore complies with local policy
Applicant's response	Noted
14.5 – 14.7	<p>Socio-Economic</p> <p>As set out in the appendix to the Statement of Common Ground, SCC has outlined its concerns that the applicant has not fully recognised the stresses within the construction skills sector and the cumulative effect of multiple infrastructure projects in the region and how that may be exacerbated by East Anglia THREE.</p> <p>As such we would expect that the Skills Strategy agreed through the discharge of requirements for EA ONE to be refreshed in collaboration with local partners and expanded to include further initiatives to mitigate the impacts of the project, and also to maximise benefits to the local area. Discussions remain ongoing with the applicant on this matter.</p>
Applicant's response	<p>The Applicant can confirm that discussions are ongoing on socio economics in general. The Applicant's Socio Economic assessment submitted as part of the application for Development Consent did not conclude that any further skills interventions were necessary specifically for the East Anglia THREE project over and above those already secured by or in some cases already underway as part of the East Anglia ONE project. In addition, the East Anglia ONE skills strategy (Document reference: Deadline 1/DCO ISH/EAONE Skills Strategy) makes a clear commitment to future ScottishPower Renewables offshore wind projects in East Anglia and as such, East Anglia THREE will fully support this strategy.</p> <p>It should also be noted that as part of the bidding process for regulatory support under the contracts for difference mechanism, East Anglia THREE will be required to provide, as part of wider supply chain strategy, a project specific skills plan. This will be done at a time when details of the project itself, the employment market and the effects of East Anglia ONE skills interventions will be more clearly understood, allowing more informed planning to be undertaken.</p>
15.7	<p>Transport And Traffic</p> <p>In summary, the transport and traffic implications of the development can be adequately controlled through the implementation of measures set out in the Outline TMP, AMS and Travel Plan, which are provided for by appropriate requirements within the DCO. The controls and restrictions in there have been designed to minimise the impacts of HGV</p>

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	<p>movements in particular on the local highway network and respond to local issues – and will have been tried and tested through the construction of East Anglia ONE. The local authorities will work with the applicant to examine the monitoring and enforcement mechanisms that will be needed to ensure the documents are adhered to (and thus included in the final version of the TMP), but provided that they are, the development would comply with local planning policy</p>
Applicant's response	Noted
	<p>Waste Management The Outline Code of Construction Practice contains waste management proposals which would be developed further via Requirement 22 in the draft DCO. Measures would therefore be in place to achieve compliance with local policy.</p>
Applicant's response	Noted
	<p>Water Quality And Resources DCO Requirement 22 provides for a CoCP to be agreed with the local planning authority. This is likely to require consultation with the Environment Agency in view of its specialist expertise in this topic area. Through the implementation of the CoCP the local authorities are satisfied that local policy compliance can be achieved.</p>
Applicant's response	Noted
18.4, 18.5	<p>Design DCO Requirement 12 sets out the design parameters for the substation site which will comprise Work No. 67. The supporting Design and Access Statement confirms that the design principles established between the applicant and the local authorities for the East Anglia ONE project are equally applicable to the proposal now under consideration. The local authorities concur with this view however to ensure that the provisions of the Design Principles are adhered to and appropriate cross-reference in the DCO is required.</p> <p>The Design Principles established for the East Anglia ONE project have been taken forward by the applicant in conjunction with the local authorities on a collaborative basis. Various design iterations have been produced and subsequently reviewed by the Design Council. The approach that has been followed to date is an example of good practice and subject to a similar arrangement being followed for this project the local authorities consider that the design and appearance of the onshore infrastructure can be appropriately</p>

REF	Comment
	managed to meet both national and local policy tests.
Applicant's response	Noted

ScottishPower Renewables
Offshore Wind Development

Address: 4th Floor, 1 Atlantic Quay, Glasgow, G2 8JB

Eastangliathree@ScottishPower.com

