

East Anglia THREE  
Offshore Windfarm

East Anglia THREE

# Statement of Common Ground

Suffolk Preservation Society

Document Reference – Deadline 3/  
SoCG/ Suffolk Preservation Society and  
Applicant

Author – Royal HaskoningDHV  
East Anglia THREE Limited  
Date – 10 August 2016  
Revision History – Revision B

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# Table of contents

<b>1</b>	<b>Introduction</b>	<b>2</b>
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
<b>2</b>	<b>Agreement Log</b>	<b>4</b>
2.1	Onshore Archaeology and Cultural Heritage	4
2.2	Seascape, Landscape and Visual Amenity	8
	<b>Appendix 1 SPS response to Phase III consultation</b>	<b>14</b>
	<b>Appendix 2 Reply letter to Relevant Representation</b>	<b>18</b>

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# 1 Introduction

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## 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 18<sup>th</sup> November 2015 and accepted for examination on 15<sup>th</sup> 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 14<sup>th</sup> 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 11<sup>th</sup> April 2016 (the **Relevant Representation**). EATL has replied to each point raised in the Relevant Representation by way of a letter (Appendix 2).

SPS made a further written representation to the Planning Inspectorate on 27<sup>th</sup> July 2016 (the **Written Representation**).

Both Parties met on the 8<sup>th</sup> August 2016 at the SPS Office Lavenham to discuss and explore the items of difference and for SPS to be further briefed on the Other Environmental Information (OEI) issued on the 27<sup>th</sup> July 2016 for consultation.

## 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
<b>EIA</b>			
Existing environment	<p>The description of baseline conditions is accurate in terms of the Cultural Heritage that exists within the Order Limits and surrounding area.</p> <p>As outlined in the Appendix 2, the assessment of setting within Chapter 25 Onshore Archaeology and Cultural Heritage of the Environmental Statement used bare-earth topographic data in order to generate a Zone of Theoretical Visibility (ZTV) within this all designated assets in a radius of up to 4 km were considered (extended to 10 km for Registered Parks and Gardens). Within the 500 m Study Area of the site non-designated assets (such as locally listed buildings) also were considered. This ZTV was then compared to actual views and existing screening (buildings and vegetation).</p> <p>Assessment of impacts to setting (which can include non-visual impacts) must consider which aspects of the current setting of an asset contribute to its significance or importance.</p> <p>Based on the ZTV and site visit potential impacts to setting were considered for two Registered Parks and Gardens; six Grade I and one Grade II* Listed Buildings; and eight Grade II Listed Buildings. A summary of the assessment of potential impacts to the setting of these assets was provided in table</p>	<p>The SPS remain concerned that there may be discrepancies in the Schedules of the Listed Heritage Assets within the defined ZTV, namely Thornbush Hall and Grindle Farm which are close by the Converter Station site. In addition a number of buildings in Sroughton and Somersham, including a grade II* church appear not to have been included.</p>	<p><b>Not Agreed.</b></p> <p>SPS to confirm acceptance of EATL's Schedule of Listed Heritage Assets is acceptable, pending further review.</p>

Topic	EATL Position	SPS Position	Final Position
	<p>25.10 of the ES.</p> <p>No non-designated heritage assets were identified as sensitive receptors within the 500 m Study Area. The medieval settlements referred to in the response (such as Burstall and Flowton have no formal designation and lie over 1 km from the substation site.</p> <p>Of the identified assets only the Grade II Listed Fidgeon's Farmhouse was identified to have any significant views incorporating the substation location. The two assets identified by SPS were both identified in the original setting assessment as being outwith the ZTV, i.e. not visible due to topography, and therefore not taken forward for further assessment. Viewpoint 9 of the LVIA Chapter incorporated Thornbush Hall was considered and concluded to be screened by intervening woodland.</p>		
Methodology	<p>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.</p>	<p>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.</p> <p>The SPS note that further detail in terms of</p>	<p><b>Not Agreed</b></p> <p>The SPS wishes to reserve its position on this until the issue above has been resolved and that the outcome of the OEI consultation is known.</p>

Topic	EATL Position	SPS Position	Final Position
		<p>describing the assessment undertaken is now contained with the OEI, which is currently being consulted upon.</p>	
<p>Assessment conclusions</p>	<p>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.</p>	<p>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.</p> <p>The SPS within its Written Representation has accepted that <i>'the site has been materially harmed by the existing infrastructure and so the debate should now focus on whether adequate remediation through appropriate mitigation can be effectively achieved'</i>.</p>	<p>Although SPS <b>do not fully agree</b> with the assessment conclusions SPS does accept that the Site has been changed by the existing infrastructure and subject to the acceptance EATL's Schedule of Listed Heritage Assets and does not wish to comment further.</p>

## 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, which was further updated in the East Anglia THREE Other Environmental Information (OEI). 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
<b>EIA</b>			
Existing Environment	The description of baseline conditions is accurate in terms of the Cultural Heritage that exists within the Order Limits and surrounding area as outlined in <i>Table 1. SoCG – Onshore Archaeology and Cultural Heritage</i> .	The SPS remain concerned that not all the Listed Heritage Assets have been accurately identified within the defined ZTV as noted in <i>Table 1. SoCG – Onshore Archaeology and Cultural Heritage</i>	<b>Not Agreed.</b> SPS to confirm acceptance of EATL's Schedule of Listed Heritage Assets is acceptable, pending further review.
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 remain concerned that not all the Listed Heritage Assets have been accurately identified within the defined ZTV, although SPS are encouraged by the work undertaken and the further information now provided within the updated LVIA and Landscaping Masterplan documentation these remain to be accepted into the Examination and therefore wish to reserve its position.	<b>Not Agreed</b> SPS wishes to reserve its position until the Schedule of Listed Heritage Assets is agreed and the updated LVIA and Landscaping Masterplan are accepted into the Examination.
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 already noted in Table 1 above SPS has within its Written Representation accepted that <i>'the site has been materially harmed by the existing infrastructure and so the debate should now focus on whether adequate</i>	<b>Not Agreed.</b> SPS to review the East Anglia THREE Other Environmental Information.

Topic	EATL Position	SPS Position	Final Position
		<i>remediation through appropriate mitigation can be effectively achieved</i> '. Subject to the first item above being resolved.	
	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 susceptible than if there were no other developments in this location.	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 compromised landscape or setting is more sensitive to harm, not less.	<b>Not Agreed.</b>
<b>Management measures</b>			
	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. 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).	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.  Although SPS are encouraged by the further work undertaken by EATL and the additional information now provided within the updated LVIA and Landscaping Masterplan documentation these remain to be accepted into the Examination. Nevertheless SPS are awaiting advice on the revised proposals from its landscape advisor and therefore wishes to reserve its position until such time this is available.	<b>Not Agreed.</b>  SPS to review the East Anglia THREE Other Environmental Information.

Topic	EATL Position	SPS Position	Final Position
<p>Design Principles</p>	<p>The principles for the appearance of the buildings and other structures have been established for East Anglia ONE with some cognisance of the potential for further buildings being needed for future phases. Both the design of the East Anglia ONE substation and the potential mitigation for it has been subsequently refined. Landscaping proposals will be developed along similar lines for East Anglia THREE and this will supersede the original East Anglia ONE Design Principles.</p> <p>The Landscape Masterplan included both East Anglia THREE and a future project (Deadline 2 / First Written Questions/ Landscape Masterplan/ PN1, PN3, LH14) to illustrate how the landscape mitigation would evolve with each proposed development in an integrated way.</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>The SPS has been advised that the Design Principles have been updated from East Anglia ONE but await provision of these to reassess their applicability. The SPS identified within its Written Submission a number of further aspects that it would wish to be seen covered by the Design Principles namely;</p> <ul style="list-style-type: none"> <li>• A clear commitment to a Design Review</li> <li>• A defined lighting strategy</li> <li>• Adoption of non-reflective insulators</li> <li>• Setting of security fencing behind landscaping</li> <li>• A kiosk siting protocol</li> </ul>	<p><b>Not Agreed.</b></p> <p>SPS to review the updated East Anglia ONE Design Principles as part of the Landscape Masterplan (Deadline 2 / First Written Questions/ Landscape Masterplan/ PN1, PN3, LH14)</p>

Topic	EATL Position	SPS Position	Final Position
<p>Environmental Fund</p>	<p>The East Anglia THREE project will create investment in the local economy. The Applicant has already committed to evolve and support the existing skills strategy (Document Reference: Deadline 1/ DCO ISH/EAONE Skills strategy) approved under the East Anglia ONE Order throughout the construction period of East Anglia THREE, to ensure a lasting legacy from the project.</p> <p>EATL does not consider that an environmental fund is appropriate or necessary to make the project acceptable in planning terms. No environmental fund was required for East Anglia ONE. It is considered that environmental benefit is derived from the major financial investment to be made by undergrounding the onshore cables and through the installation of ducts by East Anglia ONE for the use of East Anglia THREE, substantially minimising onshore construction activities.</p>	<p>The SPS position remains that a dedicated Environmental Fund should be established by EATL to support the local communities affected by the Project and rejects the statements made by EATL in respect to the East Anglia One Section 106 agreement and the Local Planning Authorities' statement about status of such funding.</p>	<p><b>Not Agreed.</b></p>

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

Signed	
Printed Name	<b>Fiona Cairns</b>
Position	Director
On behalf of	Suffolk Preservation Society
Date	10 August 2016

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

Signed	
Printed Name	Keith Morrison
Position	East Anglia THREE Senior Project Manager
On behalf of	East Anglia THREE Limited (EATL)
Date	10 August 2016

# Appendix 1 SPS response to Phase III consultation

14 July 2015

FREEPOST RSTC-EJEY-RKRX  
EAOW  
4<sup>th</sup> Floor  
1 Atlantic Quay  
45 Robertson Street  
Glasgow G2 8JB

Dear Sirs

**Section 42 of the Planning Act 2008, Further Consultation on the East Anglia THREE Offshore Windfarm Project**

I am writing on behalf of the Suffolk Preservation Society (SPS) regarding the 'Further Consultation' on this project. Thank you for consulting SPS on this latest phase of your East Anglia Zone developments.

SPS is a non-political, independent, self-funding charity that was established in 1929. Its charitable objects are to "promote the conservation, protection and improvement of Suffolk's physical and natural environment for the public benefit by ensuring any change is undertaken sympathetically and to the highest level of design and sustainability possible".

Suffolk's built heritage, its historic buildings, conservation areas, diverse landscapes and the sustainability of its communities are a major part of the SPS's work in protecting what is fundamentally important in and to the County. Scrutiny of planning applications that affect heritage assets are a particular focus in helping to deliver a County landscape that has pride in and respect for its vernacular past. SPS campaigns on important issues which affect its area of work and we work constructively with the county and local planning authorities and other relevant bodies to help achieve better outcomes in planning and the management of our historic natural and built environment. SPS works and promotes co-operation with other groups whose objects are consistent with its own including town and parish councils and local amenity societies on issues which we all have in common.

As previously stated under our response to East Anglia One Offshore Windfarm SPS remains in principle supportive of non-visual intrusive infrastructure provision through the use of undergrounding of cables. We are pleased to note that adequate provision will have been made under East Anglia One to install cable ducting suitable to accommodate both projects and that once installation activities are completed at the 'landfall site' at Bawdsey there will be no buildings or above ground infrastructure at this location. However, although of minor size, we are concerned that the number of kiosks along the cable route to the Converter Station has been significantly increased and would ask that appropriate consideration is given to their appearance and positioning to minimise any further visual impacts, however minimal.

Based upon the information provided for East Anglia Three, SPS's principal focus is on the impacts from the Converter Station which will be, as you have also recognised, a further significant development in this locality. Not only does SPS have concerns regarding the setting of local designated heritage assets immediately affected including the Church of St Mary, Flowton and Bullenhall Farmhouse, Bramford, Canes Farm, Half Moon House Burstall and Hill Cottage, Burstallhill but also the overall cumulative impact that this structure, its supporting infrastructure and future identified expansions will have in the wider rural landscape setting. The SPS has strong reservations about the extent and coverage of the Heritage Impact Assessment, in particular during the operational period of the Converter Station and would ask that you revisit this prior to finalisation of the Environmental Statement.

We are pleased to understand that the final grid connection will be entirely via underground cables from the Converter Station to the National Grid's substation at Bramford which has the capacity and infrastructure already in place to receive these additional inputs without the need for any upgrades or provision of additional infrastructure.

The Converter Station will be uncharacteristically large and dominant for its location yet very little detail has been provided to comment upon at this stage, including any design form or mitigation proposed. Currently 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 required later under East Anglia Two and Four.

We are pleased to understand that it is intended to undertake a more detailed independent design review using the services of CABE during the latter part of the summer to further inform your considerations around these issues and that detailed discussions are taking place with the local authorities, some of the affected parish councils and local landowners in respect of the level of the required on-site and off-site mitigation works to be provided.

Reaching a suitable level of agreement and support with all interested parties at the earliest stage of the project will certainly aid the later examination stage process. To this extent SPS would also be willing to engage further with East Anglia THREE Limited at this time to provide more commentary around siting, design principles and landscape provision prior to any design review submission.

Finally we would reiterate, as at East Anglia ONE, the case for an environmental fund to be established to provide a degree of compensation to those local communities that will be undoubtedly impacted upon during both the construction and lifetime operation of this project. The absence of any such recognition of the impact from such significant infrastructure provision within small rural communities we see as being both unacceptable and inequitable to those communities.

We trust that you find these initial comments constructive and we look forward to working closely with you in this respect.

Yours faithfully

A solid black rectangular box used to redact the signature of the sender.

Fiona Cairns

Director

Cc Mr G C Watkins, Chairman of Flowton Parish Meeting

Mr B Gasper, Chairman, Burstall Parish Council and Mr K Welsby, Chairman Bramford Parish Council

Michael Wilks, Suffolk County Council

# Appendix 2 Reply letter to Relevant Representation



Fiona Cairns  
 Suffolk Preservation Society  
 Little Hall  
 Market Place  
 Lavenham  
 Sudbury  
 CO10 9QZ

FREEPOST RSTC-EJEY-RKRX  
 1 Atlantic Quay,  
 45 Robertson Street,  
 4th Floor,  
 Glasgow, G2 8JB

2016-06-23

Dear Mrs Cairns,

**Planning Act 2008**

**East Anglia THREE Limited**

**The Proposed East Anglia THREE Offshore Wind Farm Order**

**Relevant Representation reply letter**

East Anglia THREE Limited (EATL) would like to thank you for taking the time to provide a relevant representation to the development consent order application made by EATL for the East Anglia THREE offshore wind farm.

In this letter we provide a reply to all the comments you have made in your relevant representation. In order to do this in a clear and transparent manor this is in the form of a tabulated response.

Relevant Representation Comment	EATLs response
<b>Historic environment</b>	
<p>The SPS's principal concern is the further significant impacts of a Converter Station on the setting of designated heritage assets together with considerable concerns about future identified expansions. 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.</p>	<p>As part of the embedded mitigation strategy the substation was located in order to gain maximum benefit from existing screening (in particular that provided by the existing areas of Ancient Woodland). Further planting is to take place to the south-west, north and east of the substation site to complement the existing planting and provide further screening. This will obviously take time to develop but by year 15, the screening by the mitigation planting will be sufficient to reduce any impacts to not significant / negligible, including any views from surrounding settlements. Visualisations and photomontages including the anticipated screening effects of the mitigation planting were provided as part of the Seascape, Landscape and Visual Amenity chapter of the Environmental Statement (ES) (Figures 29.9 – 29.24).</p> <p>Assessment of impacts to setting (which can include non-visual impacts) must consider which aspects of the current setting of an asset contribute to its significance or importance.</p>



Relevant Representation Comment	EATLs response
	<p>Based on the Zone of Theoretical Visibility (ZTV) and site visit, potential impacts to setting were considered for:</p> <ul style="list-style-type: none"> <li>• Two Registered Parks and Gardens;</li> <li>• Six Grade I and one Grade II* Listed Building; and</li> <li>• Eight Grade II Listed Buildings.</li> </ul> <p>A summary of the assessment of potential impacts to the setting of these assets was provided in Chapter 25 Onshore Archaeology and Cultural Heritage, Table 25.10 of the ES.</p> <p>The medieval settlements referred to in the response (such as Burstall and Flowton) have no formal designation and lie over 1km from the substation site. All are active communities and reflect development and use up to the present day. Chapter 29 identified that although the landscape here is largely rural, this agricultural landscape has been significantly modified by modern farming and a number of intrusive modern features such as the existing substation.</p> <p>Of the identified assets only the Grade II Listed Fidgeon's Farmhouse (LB1293253) was identified to have any significant views incorporating the substation location. Development here was considered to comprise a change within the largely agricultural setting of the asset but not to affect its main aspect.</p>
<p>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.</p>	<p>The assessment of setting within the Onshore Archaeology, Chapter 25 of the ES used bare-earth topographic data in order to generate a ZTV. Within this all designated assets in a radius of up to 4km were considered. This radius was extended to 10km for Registered Parks and Gardens. Within the 500m Study Area of the site non-designated assets (such as locally listed buildings) were also considered. This ZTV was then (as part of the work undertaken for East Anglia ONE) compared to actual views and existing screening (buildings and vegetation). Information provided in the Landscape, Seascape and Visual Assessment, Chapter 29 of the ES was also considered which included visual impacts to the landscape character.</p> <p>No non-designated heritage assets were identified as sensitive receptors within the 500m Study Area.</p>
<p><b>Landscape and Visual Impacts</b></p>	
<p>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.</p>	<p>The methodology accords principally with guidance set out in the updated GLVIA 3 (as detailed in Appendix 29.1 of the ES) as well as a number of other documents. The visualisations include computer models for each of the viewpoints and photomontages for those with potential to undergo significant effects. These present an accurate representation of what viewers would see in terms of how the different buildings will interact and include the additional phase of mitigation planting after 15 years. Mitigation plans have been refined through East Anglia ONE detailed design and these enable the computer model and photomontages to show with more certainty</p>

Relevant Representation Comment	EATLs response
	the effect of the mitigation planting / bunding.
<p>The SPS does not consider the landscape impacts of the scheme have been fully identified or adequately mitigated and believe that careful design and layout would have minimised some impacts.</p>	<p>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.</p> <p>The mitigation measures, which have recently been refined (see final row below), 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.</p>
<p>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 compromised landscape or setting is more sensitive to harm, not less.</p>	<p>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 susceptible than if there were no other developments in this location.</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>Finally we would raise the case for an environmental fund to compensate (in part) those that will be undoubtedly impacted upon and disrupted during the life of this project. The absence of any such recognition of the impact from such significant infrastructure provision within small rural communities we consider to be wholly unacceptable and inequitable to the cost being paid by those communities.</p>	<p>The proposed mitigation comprises extensive woodland planting that has been designed to mitigate the visual effects from the key visual receptors of the nearby settlements. The design principles from East Anglia ONE are still applicable and refinement has taken place through the detailed design of the mitigation works, which has been based on these principles.</p> <p>The information provided in the application for East Anglia THREE reflected the fact that work for East Anglia ONE was on-going and therefore was necessarily high-level in order to not prejudice or contradict the work being undertaken for East Anglia ONE. Since the non-material change application for East Anglia ONE was consented, both the design of the East Anglia ONE substation and the potential mitigation for it have been refined. The current masterplanning exercise being undertaken by SPR for all East Anglia Offshore Wind projects seeks to develop the mitigation across all projects in an integrated way. Prior to submission of the DCO application, EATL stated the intention to undertake further landscape assessment to account for the ongoing masterplanning process. Therefore it is EATL's intention to submit a revised assessment as part of Further Environmental Information.</p>

We look forward to meeting with you and discussing the possibility of reaching agreement on all of the matters included above through a Statement of Common Ground (SoCG) as requested by the Planning Inspectorate in their Rule 6 letter \*.

\* available at : <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/east-anglia-three-offshore-wind-farm/?ipcsection=docs>



If you wish to discuss this or any other issues in connection with the Project, please contact Keith Morrison, East Anglia THREE Senior Project Manager, ScottishPower Renewables, 4th Floor, Atlantic Quay, Glasgow G2 8JB or by email at [Eastangliathree@scottishpower.com](mailto:Eastangliathree@scottishpower.com)

Yours faithfully



Keith Morrison  
Senior Project Manager

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