

FAO:

Keith Morrison Senior Project Manager

Rick Campbell Project Manager - East Anglia Offshore Wind

31 August 2016

Dear Mr Morrison and Mr Campbell,

Update to the Statement of Common Ground in respect of the Other Environmental Information (OEI) - Landscape and Visual Impact Assessment (LVIA)

Further to the provision of this updated information the Local Authorities that is, Suffolk County Council, Suffolk Coastal District Council and Mid Suffolk & Babergh District Councils offer the following comments in order to update the Statement of Common Ground.

The revised and updated LVIA presented as part of the OEI is, in general, a reasonable and effective assessment of the likely landscape and visual effects of the project. The revisions that have been made address the issues identified in our previous comments.

The SCC Senior Landscape Officer and the SCDC Landscape Manager have provided you with comments on the revised and updated LVIA, prior to its submission to PINS. These identified and clarified issues in respect of duration of impacts, local landscape policy and protection of landscape features.

In addition, whilst the Local Authorities are content that that the assessment is acceptable they wish to make the following points;

- 1) Given the comparatively limited height and mass of the EA1 sub-station, as amended, the extent of mitigation planting and the larger height and massing of the EA3 converter station, the assessment may have given undue weight to the impact of the EA1 project on the sensitivity of the baseline landscape.
- 2) The proposed scheme of mitigation is likely, in practice, to ameliorate the majority of significant visual impacts at the substation site in 15-20 years, rather than the 15 years indicated in the LVIA.
- 3) Whilst the majority of significant visual effects of development are likely to be mitigated within 15-20 years, it is the intention of the EA1 s106/111 agreement, (which provides index linked funding), to try to mitigate the impacts of the site as a whole more rapidly, with specific hedgerow planting and maintenance, (by agreement with local landowners), closer to receptors. The offsite planting will also reduce the longer term residual visual impacts of the site.

The s106/111 agreement includes a pool of funding to support further offsite planting. This allows needs and opportunities for offsite planting that could not be readily identified at the application stage, but are subsequently identified by adjacent residents & parishes, to be dealt with.

East Anglia THREE
Offshore Windfarm

East Anglia THREE

Applicants Comments on Responses to the Other Environmental Information

Document Reference – OEI/Additional Response

Author – Royal HaskoningDHV
East Anglia THREE Limited
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1 Introduction

1. The Local Planning Authorities were not able to submit a formal response on the Other Environmental Information (OEI) by the deadline of 29th August 2016, however a draft response was provided by email.
2. A formal response was sent to East Anglia THREE Limited on 31st August 2016 however this was not included in the submission of the OEI due to time constraints.
3. Comments on the draft response (Response 1, as submitted to the Planning Inspectorate on 31st August 2016) and formal response (Response 2) are provided below.

1.1 Local Planning Authorities (LPAs) Response 1

ID	Comment and Applicants response
LPA 1	Para 61 Table 29.3. 'early' installation of tree/hedge protective fencing – needs to be the first thing, installed after any tree or hedge works, and before any other operation.
Applicant's response	Noted. The final detail will be confirmed post consent in consultation with the relevant Local Authorities.
LPA 2	Page 61 Impacts on Physical Features. For hedges this is described as very short term (0-1 year) across the board, but where they have been removed the impact must be short term (that is 1-5 years) until the replanting has established and has a degree of maturity. Same in Table 29.10 page 69/70.
Applicant's response	EATL thanks the LPAs for this comment and notes that this does not materially affect the assessment as presented.
LPA 3	<p>Paras 129-131 Only refers clearly Mid Suffolk SLAs (Policy CL2) and not SCDC; Policy CL13 is the policy that identifies Special Landscape Areas in Suffolk Coastal; although they are shown on Figure 29.2*</p> <p>* SLAs are landscapes that are designated for their local importance. (Saved Policy CL2 MSDC and Policy AP13 SCDC) Saved Policy CL2 from the Mid Suffolk Local Plan (1998) states 'Within Special Landscape Areas, particular care will be taken to safeguard landscape quality, and where development does occur it should be sensitively designed, with high standards of layout, material and landscaping.' With specific reference to utility installations and power lines, there is an expectation that these should be routed away from SLAs to avoid visual intrusion. Suffolk Coastal District Policy AP21, also states that: 'In the Area of Outstanding Natural Beauty and Special Landscape Areas the form of</p>

ID	Comment and Applicants response
	buildings, choice of materials, and colours must be sympathetic to the general character of the area and seek to reduce visual impact.
Applicant's response	Reference to planning policies was made in Paras 129-131 to establish the background to the SLAs designation in conjunction with guidance from the LPAs. While reference to AP13 would have added to this background setting, it does not have a direct bearing on the assessment or the assessment process and inclusion of a reference would not materially alter any of the assessment outcomes.
LPA 4	Significant effects and the establishment of planting at the sub-station - 15 years is slightly optimistic; in practice 15-20 years would probably be a more reasonable worst case in terms of the mitigation of the majority of significant effects by the onsite planting.
Applicant's response	<p>Mitigation plans have been refined through East Anglia ONE detailed design and these enable the computer model and photomontages to show with more certainty the effect of the mitigation planting / bunding. 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.</p> <p>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. As stated in the OEI, the exception to this is Viewpoint 12, which will be screened by year 20.</p>

1.2 Local Planning Authorities (LPAs) Response 2

ID	Comment and Applicants response
LPA 5	The revised and updated LVIA presented as part of the OEI is, in general, a reasonable and effective assessment of the likely landscape and visual effects of the project. The revisions that have been made address the issues identified in our previous comments.
Applicant's response	EATL thanks the LPAs for this comment and has nothing further to add.
LPA 6	Given the comparatively limited height and mass of the EA1 sub-station, as amended, the extent of mitigation planting and the larger height and massing of the EA3 converter station, the assessment may have given undue weight to the impact of the EA1 project on the sensitivity of the baseline landscape.
Applicant's	The visual impacts for the East Anglia ONE substation are considered

ID	Comment and Applicants response
response	<p>as per the methodology and revised substation design as agreed with the Local Planning Authorities, and as set out in the OEI.</p> <p>The cumulative assessment presented in the OEI improves on the cumulative assessment provided in the Environmental Statement, as it benefits from the reduced East Anglia ONE dimensions.</p> <p>Visual mitigation for the substations at Bramford has been developed to account for East Anglia ONE, East Anglia THREE and a future project, as set out in the East Anglia Projects Masterplan (Deadline 2/ First Written Questions/ Landscape Masterplan/ PN1, PN3, LH14).</p> <p>It is not just the presence of East Anglia ONE substation, but also Bramford substation and the associated pylon lines, that characterise certain landscape and visual receptors around the proposed development. These developments reduce the susceptibility of the receptors to the proposed development as they already form part of the baseline character. The proposed site will have a lesser sensitivity owing to existing and consented development, compared to a similar site but with no existing development present.</p>
LPA 7	<p>The proposed scheme of mitigation is likely, in practice, to ameliorate the majority of significant visual impacts at the substation site in 15-20 years, rather than the 15 years indicated in the LVIA</p>
Applicant's response	<p>As stated above, the mitigation plans as refined by the East Anglia ONE detailed design process has been developed in conjunction with the Local Planning Authorities, and the assessment based on these presents an accurate representation of what viewers would see in terms of how the different buildings will interact.</p> <p>The assessment concludes that the mitigation planting will be sufficient to reduce any impacts to not significant / negligible by year 15. The exception to this is Viewpoint 12, which will be screened by year 20.</p>
LPA 8	<p>Whilst the majority of significant visual effects of development are likely to be mitigated within 15-20 years, it is the intention of the EA1 s106/111 agreement, (which provides index linked funding), to try to mitigate the impacts of the site as a whole more rapidly, with specific hedgerow planting and maintenance, (by agreement with local landowners), closer to receptors. The offsite planting will also reduce the longer term residual visual impacts of the site.</p> <p>The s106/111 agreement includes a pool of funding to support further offsite planting. This allows needs and opportunities for offsite planting that could not be readily identified at the application stage, but are subsequently identified by adjacent residents & parishes, to be dealt with.</p>
Applicant's response	Noted

ScottishPower Renewables
Offshore Wind Development

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

Eastangliathree@ScottishPower.com

