



SCOTTISHPOWER  
RENEWABLES

# East Anglia ONE North and East Anglia TWO Offshore Windfarms

## Applicants' Comments on Local Impact Report

Applicants: East Anglia ONE North Limited and East Anglia TWO Limited  
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Applicable to **East Anglia ONE North** and **East Anglia TWO**



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## Glossary of Acronyms

AIL	Abnormal Indivisible Load
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BEIS	Department of Business, Energy and Industrial Strategy
CCS	Construction Consolidation Sites
CIA	Cumulative Impact Assessment
CoCP	Code of Construction Practice
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DMO	Destination Management Organisation
EA1N	East Anglia ONE North
EA2	East Anglia TWO
EIA	Environmental Impact Assessment
EMP	Ecological Management Plan
ES	Environmental Statement
ESC	East Suffolk Council
GEART	Guidelines for the Environmental Assessment of Road Traffic
HDD	Horizontal Directional Drill
HGV	Heavy Goods Vehicle
HRA	Habitats Regulations Assessment
LIR	Local Impact Report
LVIA	Landscape and Visual Impact Assessment
MoU	Memorandum of Understanding
NALEP	New Anglia Local Enterprise Partnership
NG-ESO	National Grid – Electricity Systems Operator
NGET	National Grid Electricity Transmission Plc
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NRMM	Non-Road Mobile Machinery
NSIP	Nationally Significant Infrastructure Project
OCTMP	Outline Construction Traffic Management Plan
OLEMS	Outline Landscape and Ecological Management Strategy
OPCAEP	Outline Pre-Commencement Archaeological Execution Plan
PRoW	Public Right of Way
SCC	Suffolk County Council
SCLP	Suffolk Coastal Local Plan
SLVIA	Seascape, Landscape and Visual Amenity
SoCG	Statement of Common Ground
SPA	Special Protection Area
SPR	Scottish Power Renewables
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage System
TP	Travel Plan
WSI	Written Scheme of Investigation



## Glossary of Terminology

Applicant	East Anglia TWO Limited / East Anglia ONE North Limited
Construction consolidation sites	Compounds associated with the onshore works which may include elements such as hard standings, lay down and storage areas for construction materials and equipment, areas for vehicular parking, welfare facilities, wheel washing facilities, workshop facilities and temporary fencing or other means of enclosure.
The Councils	East Suffolk Council and Suffolk County Council
Development area	The area comprising the onshore development area and the offshore development area (described as the 'order limits' within the Development Consent Order).
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
Horizontal directional drilling (HDD)	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
Meteorological mast	An offshore structure which contains metrological instruments used for wind data acquisition.
Mitigation areas	Areas captured within the onshore development area specifically for mitigating expected or anticipated impacts.
National electricity grid	The high voltage electricity transmission network in England and Wales owned and maintained by National Grid Electricity Transmission
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order but will be National Grid owned assets.
National Grid overhead line realignment works	Works required to upgrade the existing electricity pylons and overhead lines (including cable sealing end compounds and cable sealing end (with circuit breaker) compound) to transport electricity from the National Grid substation to the national electricity grid.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed

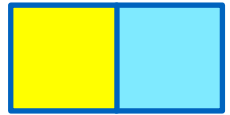


	East Anglia TWO / East Anglia ONE North project Development Consent Order.
Offshore development area	The East Anglia TWO / East Anglia ONE North windfarm site and offshore cable corridor (up to Mean High Water Springs).
Offshore infrastructure	All of the offshore infrastructure including wind turbines, platforms, and cables.
Onshore cable corridor	The corridor within which the onshore cable route will be located.
Onshore cable route	This is the construction swathe within the onshore cable corridor which would contain onshore cables as well as temporary ground required for construction which includes cable trenches, haul road and spoil storage areas.
Onshore cables	The cables which would bring electricity from landfall to the onshore substation. The onshore cable is comprised of up to six power cables (which may be laid directly within a trench, or laid in cable ducts or protective covers), up to two fibre optic cables and up to two distributed temperature sensing cables.
Onshore development area	The area in which the landfall, onshore cable corridor, onshore substation, landscaping and ecological mitigation areas, temporary construction facilities (such as access roads and construction consolidation sites), and the National Grid Infrastructure will be located.
Onshore infrastructure	The combined name for all of the onshore infrastructure associated with the proposed East Anglia TWO / East Anglia ONE North project from landfall to the connection to the national electricity grid.
Onshore substation	The East Anglia TWO / East Anglia ONE North substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure.
Onshore substation location	The proposed location of the onshore substation for the proposed East Anglia TWO / East Anglia ONE North project.



# 1 Introduction

1. This document provides comments from East Anglia ONE North Limited and East Anglia TWO Limited's (the Applicants) on the Local Impact Report (LIR) prepared jointly by East Suffolk Council (ESC) and Suffolk County Council (SCC) (the Councils). The Applicants have provided a response to each of the sections 2 – 23 of the LIR in this document. Sections 7 – 23 within the LIR largely follow the same format for each topic. Sections 7 – 23 conclude with either a 'Summary', 'Compliance with Local Policy' or 'Further Work Required' section. The relevant text from these concluding sections has been reproduced and commented upon in this document.
2. Within the LIR the Councils include four appendices. These appendices, and how the Applicants intend to respond on the information within them, are as follows:
  - Appendix 1 Rapid Historic Landscape Assessment - The Applicants respond to the information within Appendix 1 within the **Archaeology and Cultural Heritage Clarification Note** submitted at Deadline 1 (REP1-021);
  - Appendix 2 Archaeology – The Applicants will respond on the Councils' comments on the **draft Development Consent Order** (DCO) (APP-023) and **Outline Written Scheme of Investigation** (WSI) (APP-582) at Deadline 3. An updated **draft DCO** and **Outline WSI** will also be submitted at Deadline 3. The Applicants have submitted an updated **Pre-Commencement Archaeology Execution Plan** (document reference 8.2) at Deadline 1.
  - Appendix 3 Annotated Visualisations of Trees and Vegetation – The Applicants will respond to the detail provided within Appendix 3 of the LIR via a Clarification Note at Deadline 3; and
  - Appendix 4 Analysis of Background Noise Survey Data – The Applicants will respond to the information within Appendix 4 of the LIR at Deadline 3.
3. Where appropriate, the Applicants' comments on the LIR signpost to other documents submitted to the Examinations. Further detail on each topic covered can be found in the documents submitted with the Projects' DCO applications (the Applications) and to the Examinations, such as (but not limited to): the Statements of Common Ground (SoCG) with the Councils (REP1-072); associated Clarification Notes submitted at Deadline 1 or Deadline 2 of the Examinations; and specific responses to Written Questions (provided in REP1-085 to REP1-121). Where the Applicants anticipate providing further clarification on specific matters at future Examination deadlines, this is clearly stated within the response.



4. This document is applicable to both the East Anglia ONE North and East Anglia TWO DCO applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23<sup>rd</sup> December 2019 (PD-004). Whilst this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it for the other project submission.

## 2 Applicants' Comments

5. The Applicants' comments on the relevant text extracted from the LIR are presented within **Table 1** below.





Table 1 Applicants' Comments on LIR

LIR topic	Applicants' Comments
<b>2. Description of the Area</b>	
<p>Paragraphs 2.1 to 2.13 of the LIR provide the Councils' description of the Project</p>	<p>In direct response to paragraph 2.4 of the LIR, the Applicants note that the Order limits (and therefore the onshore cables) avoid Thorpeness Common as illustrated in <b>Figure 6.6a</b> of the Environmental Statement (ES) (APP-101).</p>
<b>3. Statutory Development Plan</b>	
<p><i>Paragraph 3.1 of the LIR</i></p> <p>In summary, the statutory Development Plan for the district is comprised of:</p> <ul style="list-style-type: none"> <li>• East Suffolk Council's Suffolk Coastal Local Plan 2020,</li> <li>• East Suffolk Council's - Waveney Local Plan 2019,</li> <li>• Suffolk Minerals and Waste Local Plan 2020.</li> </ul>	<p>The Applicants note that the Suffolk Coastal Local Plan 2020 and the Suffolk Minerals and Waste Local Plan 2020 are dated after the Applications were made. The <b>Development Consent and Planning Statement</b> (APP-579) summarises the approach used in the Applications (<b>section 4.2.6</b>). The Applications as submitted had regard to:</p> <ul style="list-style-type: none"> <li>• The Suffolk Coastal Final Draft Local Plan of January 2019;</li> <li>• The Waveney Local Plan 2019;</li> <li>• The Suffolk Minerals Core Strategy (September 2008); and</li> <li>• The Suffolk Waste Core Strategy (March 2011).</li> </ul>
<b>4. Other Relevant Local Policy</b>	
<p><i>Paragraph 4.11 of the LIR</i></p> <p>These are several additional documents produced and endorsed by the relevant authorities which represent local policy on specific topics, which the Councils consider of relevance to the proposed developments.</p>	<p>The <b>Development Consent and Planning Statement</b> (APP-579) summarises the relevant policies used in the Applications. The additional plans referred to by the Councils and where they have been taken into account within the Applications are as follows:</p> <ul style="list-style-type: none"> <li>• Suffolk's Local Transport Plan 2011-2031. This is considered within <b>Chapter 26 Traffic and Transport</b> of the ES (APP-074).</li> </ul>



LIR topic	Applicants' Comments
	<ul style="list-style-type: none"> <li>• Green Access Strategy.</li> <li>• The Suffolk Shoreline Management Plan (SMP) 7 was published in 2012. This is referenced within <b>Appendix 4.6 Coastal Processes and Landfall Site Selection</b> (APP-447).</li> <li>• East Suffolk Strategic Plan 2020-2024.</li> <li>• East Suffolk Economic Growth Plan 2018-2023. This is referred to within <b>Chapter 30 Tourism, Recreation and Socio-Economics</b> (APP-078).</li> <li>• New Anglia Local Enterprise Partnership (NALEP). This is referred to within <b>Chapter 30 Tourism, Recreation and Socio-Economics</b> (APP-078).</li> <li>• The AONB Management Plan 2018-2023. The Applicants note that the AONB Management Plan for the period 2013 – 2018 was referred to within <b>Chapter 29 Landscape and Visual Impact Assessment</b> (APP-077). The Applicants will submit a Clarification Note to the Examinations at Deadline 3 having reviewed the AONB Management Plan for 2018 – 2023, which will include clarification on reduced width hedgerow crossings.</li> <li>• The AONB - Natural Beauty and Special Qualities Indicators. This is considered within <b>Chapter 29 Landscape and Visual Impact Assessment</b> (APP-077).</li> <li>• East Inshore and East Offshore Marine Plans. This is considered within <b>Chapter 7 Marine Geology, Oceanography and Physical Processes</b> (APP-055).</li> </ul>
<b>5. Assessment of Impacts and Adequacy of Response</b>	
Paragraph 5.1 of the LIR	Comments are provided on individual sections below.



LIR topic	Applicants' Comments
<p>The following sections identify the relevant policies within the Development Plan and other local policy, the key issues raised by the proposed development and the extent to which the DCO submissions address them and thus the degree of policy compliance.</p>	
<p><b>6. The Principle of the Development</b></p>	
<p><b>ESC Local Plan</b> <i>Paragraph 6.1 to 6.2 of the LIR</i></p> <p>Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects sets out the matters which the local authority will take into consideration including the nature, scale, extent, and potential impact of proposals in addition to the cumulative impacts. The policy seeks to ensure that major energy projects deliver significant local benefits and provide an ongoing legacy for the local community.</p> <p>Policy SCLP9.1: Low Carbon &amp; Renewable Energy recognises the need to transition to a low carbon future and supports low carbon and renewable energy developments where they are within a suitable area or satisfy specific criteria which includes consideration of the existing environment and avoiding significant adverse impacts. This policy however focuses on onshore wind turbines as opposed to offshore turbines with onshore infrastructure, but it is of some relevance.</p>	<p>The Applicants note that the Suffolk Coastal Final Draft Local Plan referenced within <b>Chapter 3 Policy and Legislative Context</b> of the ES (APP-051) was formally adopted by ESC on 23<sup>rd</sup> September 2020.</p> <p>Whilst the Applicants note that the specific policies referred to within the LIR have been considered within the ES, they have identified that the adopted Local Plan includes some updates from the draft Local Plan, namely a slight change in the wording of Policy SCLP3.4 and one material change in that a Heritage Impact Assessment must now be undertaken for proposals such as the Projects. The Applicants have undertaken an assessment of heritage impacts, which is presented within <b>Chapter 24 Archaeology and Cultural Heritage</b> of the ES (APP-072).</p> <p>The Applicants note the wording of SCLP9.1 specifies that wind energy schemes must be located in an area identified as suitable for renewable or low carbon energy in a Neighbourhood Plan, although note that this is in the context of onshore wind energy schemes so is not considered applicable to the Projects.</p>
<p><b>Other Relevant Local Policy</b> <i>Paragraph 6.3 to 6.5 of the LIR</i></p>	<p>Noted.</p>



LIR topic	Applicants' Comments
<p>The Suffolk Growth Strategy provides particular support for offshore wind development based on the likely local economic benefits.</p> <p>ESC Strategic Plan 2020-2024 identifies renewable energy as a key priority stating that the Council will explore new ways of encouraging and investing in the use of renewable energy, both in terms of the Council's consumption and supporting residents and businesses as part of addressing climate change.</p> <p>East Inshore and East Offshore Marine Plans support proposals which will help the marine plan areas to contribute to offshore wind generation.</p>	
<p><b>Commentary</b> <i>Paragraph 6.6 to 6.12 of the LIR</i></p>	Noted.
<p><b>Adequacy of the Applications/DCOs</b> <i>Paragraph 6.13 to 6.63 of the LIR (component sections set out below)</i></p>	Comments are provided below.
<p><i>Paragraph 6.14 to 6.15 of the LIR</i></p> <p><i>Appropriate packages of local community benefit to mitigate the impacts of disturbance experienced by the local community for hosting major infrastructure projects</i> - It is understood that the Applicants intend to provide a community benefits fund. This will provide a sum of money in recognition of the impacts experienced by the local community because of the projects. This fund is however separate from the DCO process and does not form a relevant consideration for the purposes of determining the DCO applications, although the Councils welcome this commitment.</p> <p>Separate from the community benefit fund, the Councils continue to engage with the Applicants to ensure that appropriate and sufficient mitigation is provided in relation to the impacts identified by the ESs, and additional</p>	The Applicants are currently in ongoing discussions with the Councils on these matters.



LIR topic	Applicants' Comments
<p>impacts the Councils have identified. The Councils have set out within the LIR where further mitigation measures are required. Where the provision of mitigation is not possible, the Councils are seeking appropriate compensation.</p>	
<p><i>Paragraph 6.16 of the LIR</i> <i>Requirement for robust Environmental Impact Assessment (EIA)</i> – The LIR has been divided into sections which each address a different topic area of the ES. The Councils have identified at the end of each of these sections where it is considered that further work is required.</p>	Noted.
<p><i>Paragraph 6.17 of the LIR</i> <i>Robust HRA</i> – The Councils will defer to the expertise of Natural England on this matter.</p>	Noted.
<p><i>Paragraph 6.18 of the LIR</i> <i>Robust Heritage Impact Assessment</i> – The Councils have carefully considered the assessment within the ES and provided detailed comments in Section 12 of the LIR.</p>	The Applicants have commented on this matter within <b>Section 12</b> .
<p><i>Paragraph 6.19 of the LIR</i> <i>Robust Assessment of the impacts on the AONB</i> – The Councils have considered this matter in Sections 15 and 16, but also recognise the remit and responsibilities of Natural England in terms of the protected landscape of the AONB.</p>	<p>The Applicants have commented on this matter within <b>Section 15</b> and <b>Section 16</b>.</p> <p>The Applicants have noted the remit of Natural England with regard to the protected landscape of the AONB.</p>
<p><i>Paragraph 6.20 of the LIR</i></p>	The Applicants have commented on this matter within <b>Section 10</b> and <b>Section 11</b> .



LIR topic	Applicants' Comments
<p><i>Appropriate flood and erosion defences</i> – The Councils have considered the implications of the projects for flood risk in Section 11 and for coastal erosion and processes in Section 10 of the LIR.</p>	
<p><i>Paragraph 6.21 of the LIR</i> <i>Appropriate road and highway measures</i> – The Councils have considered the impacts of the projects on traffic and transport in Section 21 of the LIR.</p>	<p>The Applicants have commented on this matter within <b>Section 21</b>.</p>
<p><i>Paragraph 6.22 of the LIR</i> <i>Applicants should seek to deliver positive outcomes for the local community and surrounding environment</i> – The Councils continue to engage with the Applicants regarding the provision of adequate mitigation and compensation and also the provision of measures to deliver environmental enhancements. These discussions are ongoing.</p>	<p>The Applicants are currently in ongoing discussions with the Councils on these matters.</p>
<p><i>Paragraph 6.23 of the LIR</i> <i>Maximisation of economic and community benefits through agreement of strategies in relation to employment, education and training opportunities for the local community</i> – The Councils have considered the impacts of the projects in relation to these matters in the Section 20 of the LIR. SPR and the Councils have signed a Memorandum of Understanding (MoU) which establishes a commitment for all parties to work together to maximise the education, skills and economic benefits of the East Anglia Offshore Wind Projects. The Councils welcome this commitment through the MoU.</p>	<p>The Applicants have commented on this matter within <b>Section 20</b>. The Applicants look forward to working with the Councils to maximise the education, skills and economic benefits of the Projects through implementation of the MoU.</p>
<p><i>Paragraph 6.24 of the LIR</i> <i>Measures to ensure the successful decommissioning and restoration of the site</i> – The Councils have discussed post construction restoration of the cable</p>	<p>The Applicants have commented on the restoration of the cable corridor and mitigation planting in relation to the onshore substations within <b>Section 9</b> and <b>Section 15</b>.</p>



LIR topic	Applicants' Comments
<p>route and mitigation planting in relation to the substations site in the LIR (Sections 9 and 15). The Councils have raised concerns regarding the predicted growth rates detailed in the ES and the speed in which this would occur in reality. The Councils are continuing to engage with the Applicants to look at measures which could be adopted to improve the timeliness of restoration and mitigation planting. Decommissioning of the infrastructure has not been covered in any significant detail in the ESs. The Councils however recognise that there are controls within the draft DCOs through Requirements 30 and 37, which ensure ESC would need to approve any decommissioning plan.</p>	<p>Decommissioning has been addressed within the ES in line with standard practice. As noted by the Councils, Requirement 30 and Requirement 37 of the <b>draft DCO</b> (APP-023) ensure ESC would need to approve any decommissioning plan, and the plans must be implemented as approved.</p>
<p><i>Paragraph 6.25 of the LIR</i> <i>Appropriate monitoring measures to ensure mitigation measures remain relevant and effective</i> – The Councils recognise the importance of ensuring appropriate monitoring and control measures are incorporated within the draft DCOs and management plan documents. The need for further measures has been highlighted in Sections 7 and 21. The Councils are engaging with the Applicants in relation to this matter.</p>	<p>The Applicants have commented on this matter within <b>Section 7</b> and <b>Section 21</b>.</p>
<p><i>Paragraph 6.26 of the LIR</i> <i>Cumulative Impacts</i> - Ensuring that the full cumulative impacts of the projects are considered prior to any decision being taken in relation to these DCOs is of paramount importance to the Councils. EA1N and EA2 will have cumulative impacts with each other, in addition to cumulative impacts with other known developments. The paragraphs below consider the extent to which the cumulative impacts of the EA1N and EA2 have been minimised, in addition to whether the ESs have considered the full cumulative impacts of the projects with other developments.</p>	<p>The Cumulative Impact Assessment (CIA) does not include the proposed interconnectors (Nautilus and Eurolink) or other mooted connections at Friston for the reasons stated in <b>Chapter 5 EIA Methodology</b> (APP-053) (paragraph 86). The matter of whether these projects should be included within the CIA is also covered in the <b>Draft SoCG: East Suffolk Council and Suffolk County Council</b> submitted to the Examinations at Deadline 1 (REP1-072).</p>



LIR topic	Applicants' Comments
<p><i>Paragraph 6.27 to 6.42 of the LIR</i></p> <p><i>Sharing of Infrastructure &amp; Coordination and Method of Working</i></p>	<p>As outlined in the <b>Project Update Note</b> submitted at Deadline 2 (document reference ExA.AS-4.D2.V1), the Applicants can now confirm that should both the East Anglia ONE North project and the East Anglia TWO project be consented and then built sequentially, when the first project goes into construction, the ducting for the second project will be installed along the whole of the onshore cable route in parallel with the installation of the onshore cables for the first project. This will include installing ducting using a trenchless technique at the landfall for both Projects at the same time. Further information will be provided at Deadline 3.</p> <p>In direct response to paragraph 6.30 of the LIR, the Applicants have set out their position on the Department of Business, Energy and Industrial Strategy's (BEIS) review into the existing offshore transmission regime in <b>section 2.2 of Submission of Oral Case – Preliminary Meeting (Part 1) of 16 September 2020</b> (PDC-001). The Applicants have progressed the Projects in line with the existing regulatory regime for offshore transmission networks established by Ofgem.</p> <p>The Applicants note that changes to a coordinated approach on offshore transmission would require future regulatory change to deliver it and it is likely to be subject to public procurement. Given the considerable time periods that would be involved in developing this, the Applicants have a legitimate expectation that the Projects will be considered within the current regulatory framework in light of paragraph 2.6.34 of NPS EN3.</p>
<p><i>Paragraph 6.43 to 6.47 of the LIR</i></p> <p><i>Sizewell C - The EA1N and EA2 ESs acknowledge the need to cumulatively assess the impacts of the projects with those identified in the ES for Sizewell C. The current Cumulative Impact Assessments (CIAs) are based on the material published by EDF Energy during their pre-application phase, as this</i></p>	<p>The Applicants have been discussing, and will continue to discuss, potential cumulative impacts between the Projects and Sizewell C with the Councils during the SoCG process. A review of the Sizewell C DCO application materials to identify any requirement for updated or supplementary</p>





LIR topic	Applicants' Comments
<p>was the information available to the Applicants at the time of drafting the ESs. The Applicants have committed to providing updates regarding the cumulative impacts of the projects with SZC in relation to noise and vibration, landscape and visual impact including PRoWs, traffic and transport including air quality and availability of tourist accommodation.</p>	<p>assessments for the Applications is presented within <b>Table 1 of Procedural Decision 18 Applicants' Responses</b> (PDA-001).</p> <p>At Deadline 1, the following documents were submitted to provide further clarification on potential cumulative impacts arising between the Projects and Sizewell C:</p> <ul style="list-style-type: none"> <li>• <b>Socio-Economics and Tourism Clarification Note (SZC CIA)</b> (REP1-036)</li> </ul> <p>The following documents will be provided at Deadline 2:</p> <ul style="list-style-type: none"> <li>• <b>Sizewell C Cumulative Impact Assessment Note (Traffic and Transport)</b> (document reference ExA.AS-6.D2.V1). .</li> <li>• <b>Sizewell C Cumulative Impact Assessment Note (Landscape and Visual)</b> (document reference ExA.AS-7.D2.V1). .</li> </ul>
<p><i>Paragraph 6.48 to 6.54 of the LIR</i></p> <p><i>Future Energy projects and Future Expansion of the proposed National Grid Substation at Friston</i></p>	<p>In direct response to paragraph 6.53 of the LIR, the Applicants note that the <b>Draft SoCG: National Grid Electricity Transmission Plc</b> (NGET) submitted to the Examinations at Deadline 1 (REP1-064) confirms that only National Grid infrastructure required to connect the Projects to the national electricity grid is included within the Applications (specifically Work Nos. 34 and 38 to 43 inclusive).</p>
<p><i>Paragraph 6.55 to 6.57 of the LIR</i></p> <p><i>Permitted Development Rights</i> - The Councils consider that permitted development rights should be removed to prevent the extension or alteration of the substations under Schedule 2, Part 15, Class B of the Town and County Planning (General Permitted Development) Order 2015 without prior consent</p>	<p>The Applicants do not agree that permitted development rights should be removed. The rights under Class B are given to electricity undertakings to enable to them to discharge their obligations and functions. The rights include a range of activities which are relevant to the holders of a transmission licence.</p> <p>These are deemed necessary to enable the operation of the transmission system. It includes elements of further works and replacement. The extent of</p>



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	<p>the rights is restricted by development that is not permitted (B.1) and also by conditions (B.2). Further restrictions also potentially apply under Article 3(10) and (11) of the 2015 Order. This removes the permitted development rights in circumstances that it would involve EIA development.</p> <p>Any alterations to works constructed under the DCO would be considered as an alteration to an EIA development that had already been authorised, executed or in the process of being executed and would have to be screened. In addition, a number of the permitted development rights are restricted to "operational land" which is defined by reference to Section 263 of the Town and Country Planning Act 1990.</p> <p>It is not appropriate for the permitted development rights to be removed. It would impair the ability of a statutory undertaker to maintain and operate electrical lines and associated plant and equipment.</p>
<p><i>Paragraph 6.58 to 6.60 of the LIR</i></p> <p><i>Summary</i></p>	<p>The Applicants have noted the amended wording of corresponding policies set out within the adopted Suffolk Coastal Local Plan 2020, although do not consider any further action is required to respond to these. It is the Applicants' position that the Applications sufficiently address the policies as set out within the adopted Local Plan.</p> <p>The Applicants' position on their approach to the assessment of cumulative impacts is set out within the <b>Draft SoCG: East Suffolk Council and Suffolk County Council</b> submitted to the Examinations at Deadline 1 (REP1-072) and this is considered robust and consistent with Planning Inspectorate Advice Note 17.</p> <p>As outlined in the <b>Project Update Note</b> submitted at Deadline 2 (document reference ExA.AS-4.D2.V1), the Applicants can now confirm that should both the East Anglia ONE North project and the East Anglia TWO project be consented and then built sequentially, when the first project goes into</p>



LIR topic	Applicants' Comments
	<p>construction, the ducting for the second project will be installed along the whole of the onshore cable route in parallel with the installation of the onshore cables for the first project. This will include installing ducting using a trenchless technique at the landfall for both Projects at the same time. Further information will be provided at Deadline 3.</p>
<p><i>Paragraph 6.61 to 6.63 of the LIR</i> <i>Further Work Required</i></p>	<p>As outlined in the <b>Project Update Note</b> submitted at Deadline 2 (document reference ExA.AS-4.D2.V1), the Applicants can now confirm that should both the East Anglia ONE North project and the East Anglia TWO project be consented and then built sequentially, when the first project goes into construction, the ducting for the second project will be installed along the whole of the onshore cable route in parallel with the installation of the onshore cables for the first project. This will include installing ducting using a trenchless technique at the landfall for both Projects at the same time. Further information will be provided at Deadline 3.</p>
<p><b>7. Air Quality – Emissions and Dust</b></p>	
<p><i>Paragraph 7.44 of the LIR</i> <i>Compliance with Local Policy</i></p> <p>The assessment has mostly been undertaken in accordance with best practice guidance. Relevant local policies have been considered within the assessment. With reference to Policy SCLP10.3, the Applicants' assessment shows that there is a risk of adverse impacts to residential amenity and environmental quality. The Councils have proposed measures to ensure that the projects alone do not give rise to significant impacts in air quality through air quality monitoring and setting up a group to manage impacts from construction traffic. Additional information to demonstrate that adverse</p>	<p>The Applicants have engaged with the Councils through the SoCG process (see <b>Table 10, Draft SoCG: East Suffolk Council and Suffolk County Council</b> (REP1-072)). This has resulted in a number of requests for clarification which are detailed within the next item below.</p> <p>The Applicants are currently considering the Councils' requests in relation funding air quality monitoring and will continue to discuss means of mitigating potential air quality impacts with the Councils through the SoCG process.</p> <p>The Applicants consider the Applications are compliant with local policy and note that additional information has been provided within the <b>Air Quality Clarification Note</b> submitted to the Examinations at Deadline 1 (REP1-040).</p>



LIR topic	Applicants' Comments
<p>impacts due to the projects alone and in combination with other construction projects have been completely mitigated and managed is required. Until the Councils have received and reviewed that detail, the proposals are not considered to be compliant with local policy.</p>	<p>An update regarding the quantitative assessment of Non-Road Mobile Machinery (NRMM) emissions will be submitted at to the Examinations at Deadline 3.</p>
<p><i>Paragraph 7.45 to 7.46 of the LIR</i> <i>Further Work or Mitigation Required</i></p> <p>The Councils are of the view that that the following further work is required to allow full assessment of the impacts of the projects:</p> <ul style="list-style-type: none"> <li>• Justification for the decision to screen out re-routed traffic due to the road improvements at the A12/A1094 junction, A1094/B1069 junction and Marlesford Bridge from the air quality assessment.</li> <li>• Screening model calculation in relation to NRMM and the impact of emissions on ecological receptors. This should include a sensitivity test to investigate the potential effects of higher background levels on the study conclusions in relation to acid deposition.</li> <li>• Assessment of emissions from re-routed traffic, particular areas of concern for effects are Leiston, Saxmundham and Yoxford.</li> <li>• Assessment of the effects of emissions from haul road construction traffic on ecological receptors and human health.</li> <li>• Quantitative assessment of the cumulative impacts of EA1N and EA2 with Sizewell C.</li> </ul> <p>The Councils are of the view that the following mitigation is required in order to adequately address the potential air quality impacts caused by the projects:</p>	<p>The Applicants have submitted an <b>Air Quality Clarification Note</b> to the Examinations at Deadline 1 (REP1-040), which addresses the Councils' request for:</p> <ul style="list-style-type: none"> <li>• Justification for the decision to screen out re-routed traffic due to the road improvements at the A12 / A1094 junction, A1094 / B1069 junction and Marlesford Bridge from the air quality assessment.</li> <li>• Screening model calculation in relation to NRMM and the impact of emissions on ecological receptors. This includes a sensitivity test to investigate the potential effects of higher background levels on the study conclusions in relation to acid deposition.</li> <li>• Assessment of emissions from re-routed traffic, particular areas of concern for effects are Leiston, Saxmundham and Yoxford.</li> <li>• Assessment of the effects of emissions from haul road construction traffic on ecological receptors and human health.</li> </ul> <p>The Applicants note a request from the Councils to provide a quantitative assessment of Non-Road Mobile Machinery (NRMM) emissions, which is not addressed within the Clarification Note submitted at Deadline 1. The Applicants will provide an update regarding this matter at Deadline 3.</p> <p>Consideration of potential cumulative air quality impacts with Sizewell C are addressed within the <b>Sizewell C Cumulative Impact Assessment Note (Traffic and Transport)</b> submitted at Deadline 2 (document reference ExA.AS-6.D2.V1).</p>



LIR topic	Applicants' Comments
<ul style="list-style-type: none"> <li>Submission of Outline Port Travel Plan detailing commitment that this will include an air quality assessment of port related traffic.</li> <li>Commitment to funding monitoring and mitigation measures, if required, in the Stratford St Andrew AQMA, including consideration of a construction action group.</li> <li>Update the Outline CoCP in relation to measures to address dust nuisance and provide a commitment to and compliance monitoring of Euro VI Standards for construction vehicles and Stage V for NRMM</li> </ul>	<p>The Applicants are preparing an Outline Port Travel Plan which will be submitted to the Examinations at Deadline 3.</p> <p>The Applicants are currently considering the Councils' requests in relation funding air quality monitoring and will continue to discuss these matters with the Councils through the SoCG process.</p> <p>The Applicants will submit an updated <b>Outline CoCP</b> (APP-578) to the Examinations at Deadline 3.</p>
<p><b>8. External Lighting</b></p>	
<p><i>Paragraph 8.6 of the LIR</i> <i>Compliance with Local Policy</i></p> <p>Subject to the artificial lighting schemes for both the construction phase and operational phase of the development being detailed appropriately, the proposals would be compliant with local policy. It will however be crucial that the lighting schemes recognise the rural nature of the site and the existing limited intrusion from external lighting.</p>	<p>The Applicants note that in accordance with Requirement 25 of the <b>draft DCO</b> (APP-023), an Operational Artificial Light Emissions Management Plan which provides details of artificial light emissions during the operation of the Projects' onshore substations and National Grid substation must be submitted to and approved by the relevant planning authority before the onshore substations begin operation. This management plan will be prepared post-consent. It must be implemented as approved and maintained during the operation of the onshore substation.</p>
<p><b>9. Ecology and Ornithology</b></p>	
<p><i>Paragraph 9.8 of the LIR</i> <i>Cable route (construction) crossing the Sandlings SPA/Leiston – Aldeburgh SSSI</i></p>	<p>In direct response to paragraph 9.8 of the LIR, the Applicants refer to the <b>Outline SPA Crossing Method Statement</b> submitted at Deadline 1 (REP1-043). In accordance with Requirement 21 of the <b>draft DCO</b> (APP-023), the Applicants will prepare a final SPA Crossing Method Statement as part of the Ecological Management Plan. An updated <b>draft DCO</b> (APP-023) will be provided at Deadline 3, which will amend Requirement 21 to provide that the final SPA Crossing Method Statement must accord with the <b>Outline SPA</b></p>



LIR topic	Applicants' Comments
	<p><b>Crossing Method Statement</b> submitted at Deadline 1. No stage of the onshore works may commence until such time that the final Ecological Management Plan has been submitted to and approved by the relevant planning authority.</p>
<p><i>Paragraphs 9.9 to 9.14 of the LIR</i> <i>Cable route and substations (construction) impacts on bats</i></p>	<p>In direct response to paragraph 9.10 of the LIR, the Applicants have committed to the implementation of additional measures to mitigate potential construction phase impacts on bats within the <b>Table 7, Draft SoCG: East Suffolk Council and Suffolk County Council</b> (REP1-072). Specifically, the Applicants have committed to the use of hurdles or similar methods on completion of construction to maintain links between hedgerow gaps to enable foraging, maintain commuting routes and for insects (food source for bats) to be encouraged.</p>
<p><i>Paragraph 9.30 of the LIR</i> <i>Compliance with Local Policy</i></p> <p>A number of ecological receptors have been identified above which the Councils consider have either not been fully assessed or where insufficient mitigation is proposed to address the impacts, contrary to the requirements of local policy. The lack of commitment to ecological enhancements also conflicts with local policy. As indicated above, the Councils are engaging with the Applicants on the concerns identified and have set out below further work necessary.</p>	<p>The Applicants have engaged with the Councils through the SoCG process (see <b>Table 6, Draft SoCG: East Suffolk Council and Suffolk County Council</b> (REP1-072)), this has resulted in a number of requests for clarification which are detailed in the next item below.</p>
<p><i>Paragraphs 9.21 to 9.32 of the LIR</i> <i>Further Work or Mitigation Required</i></p>	<p>A review of the Sizewell C DCO application materials to identify any requirement for updated or supplementary assessments for the Projects is presented within <b>Table 1 of Procedural Decision 18 Applicants' Responses</b> (PDA-001). The outcome of this review did not identify a</p>



LIR topic	Applicants' Comments
<p>In summary, the Councils are of the view that the following work is required before the effects of the projects on ecology can be fully understood:</p> <ul style="list-style-type: none"> <li>• Screening model calculation in relation to NRMM and the impact of emissions on ecological receptors. This should include a sensitivity test to investigate the potential effects of higher background levels on the study conclusions in relation to acid deposition.</li> <li>• Assessment of the effects of emissions from haul road construction traffic on ecological receptors.</li> <li>• Assessment of cumulative effects of the construction works of EA1N and EA2 with Sizewell C on bats.</li> <li>• Greater commitment to and assessment of the ecological enhancements provided by the projects.</li> </ul> <p>The Councils would like to see the following documents updated:</p> <ul style="list-style-type: none"> <li>• Requirement 15 of the draft DCOs to commit to a ten-year replacement planting period for replacement woodland rather than the five-year period currently proposed and provide for the maintenance period for the woodland and substation mitigation planting to the suspended or extended if the agreed objectives set out as part of the adaptive planting maintenance are not met.</li> <li>• Requirement 21 of the draft DCOs should be updated to remove the reference to the survey results from the ES and updated to identify that the EMP will be based on up-to-date ecological survey work through the use of pre-construction surveys.</li> <li>• OLEMS to reflect the following revisions:</li> </ul>	<p>requirement for the assessment of cumulative effects of the construction works of the Projects with Sizewell C on bats.</p> <p>The Applicants have submitted an <b>Onshore Ecology Clarification Note</b> to the Examinations at Deadline 1 (REP1-023) which addresses the Councils' request for:</p> <ul style="list-style-type: none"> <li>• Screening model calculation in relation to NRMM and the impact of emissions on ecological receptors. This should include a sensitivity test to investigate the potential effects of higher background levels on the study conclusions in relation to acid deposition.</li> <li>• Assessment of the effects of emissions from haul road construction traffic on ecological receptors.</li> </ul> <p>The Applicants note a request from the Councils to provide a quantitative assessment of NRMM emissions and associated impacts upon sensitive ecological receptors, which is not addressed within the clarification note submitted at Deadline 1. The Applicants will provide an update on this matter at Deadline 3.</p> <p>The <b>Ecological Enhancement Clarification Note</b> to the Examinations at Deadline 1 (REP1-035) also provides clarification on the Councils' request for:</p> <ul style="list-style-type: none"> <li>• Greater commitment to and assessment of the ecological enhancements provided by the projects.</li> </ul> <p>The Applicants will consider the changes requested by the Councils and will submit an updated <b>OLEMS</b> (APP-584) to the Examinations at Deadline 3, which will reflect the status of discussions on landscape management with the Councils.</p>



LIR topic	Applicants' Comments
<ul style="list-style-type: none"> <li>○ Commitment to provide hurdles or similar links during construction to help maintain the commuting routes bats use for navigating through and across the site.</li> <li>○ Commitment to provide measures to help maintain foraging areas bats use during construction.</li> <li>○ Commitment to a ten-year maintenance period for the replacement woodland and provision of a management plan detailing how the woodland will be managed for the life of the infrastructure.</li> <li>○ Commitment to adaptive planting maintenance and aftercare for the replacement woodland and substation mitigation planting.</li> </ul>	
<b>10. Coastal change</b>	
<p><i>Paragraph 10.15 of the LIR</i></p> <p><i>Destabilisation of Cliff</i></p> <p>Horizontal directional drilling (HDD) has been agreed by Applicants as the preferred method of duct installation at the landfall. Full details of the Applicants' approach to management of vibration risk to the cliff stability is not yet agreed. The HDD shall be designed and managed to ensure the risk to cliff stability from vibration, or other cause linked to HDD, is as low as reasonably practical. The Applicants have detailed in their draft Outline CLMS that details of vibration monitoring for the HDD works will be included in the CLMS. The Councils are satisfied with this approach.</p>	<p>In direct response to paragraph 10.15 of the LIR, the Applicants note that the use of trenchless technique at the landfall is the Applicants position. HDD has been selected by the Applicants as the reasonable worst case trenchless technique on which to base the EIA.</p>
<p><i>Paragraphs 10.18 to 10.19 of the LIR</i></p>	<p>The Applicants have submitted an <b>Outline Landfall Construction Method Statement</b> to the Examinations at Deadline 1 (REP1-042). As referenced by</p>





LIR topic	Applicants' Comments
<p><i>Summary</i></p> <p>The Applicants' response to the Councils Relevant Representation states that sufficient information has been provided to demonstrate that the proposed works would not cause local cliff destabilisation or damage the sub-sea crag outcrop. Although the Councils do not agree that at present sufficient information has been supplied to demonstrate this, we are satisfied that there is a process in place through Requirement 13 and the CLMS, supported by the Outline CLMS, to ensure adequate information can be supplied to ensure this is the case.</p> <p>When measured against the overarching policy objectives for Coastal Change management the potential impacts of the current development are negative to neutral in that they may alter natural change. There are no positive impacts. The scale and significance of the potential negative impacts varies from low to negligible when put into context of the potential for variability in natural environmental change.</p>	<p>the Councils, Requirement 13 of the <b>draft DCO</b> (APP-023) secures the preparation of a method statement for the construction of Work No. 6 and Work No. 8 which must be submitted to and approved by the relevant planning authority prior to the commencement of Work Nos. 6 and 8. An updated <b>draft DCO</b> (APP-023) will be submitted at Deadline 3. This will provide in Requirement 13 that the final method statement for the construction of Work No. 6 and Work No. 8 must be in accordance with the <b>Outline Landfall Construction Method Statement</b> (REP1-042).</p>
<p><i>Paragraph 10.20 of the LIR</i></p> <p><i>Further Amendments Required</i></p> <p>The Councils recommend that the following amendment is required to the draft DCOs:</p> <ul style="list-style-type: none"> <li>• Inclusion of the Outline LCMS in the list of certified documents.</li> <li>• Update the wording of Requirement 13 to reflect that the LCMS should be in accordance with the Outline LCMS.</li> <li>• Requirement 37 to be updated to include infrastructure associated with work no.6 up to the point of the mean low water mark.</li> </ul>	<p>The Applicants will consider the changes requested by the Councils and will submit an updated <b>draft DCO</b> (APP-023) to the Examinations at Deadline 3.</p>



LIR topic	Applicants' Comments
<b>11. Flood Risk</b>	
<p><i>Paragraphs 11.7 to 11.17</i> <i>Surface water flooding in Friston</i></p>	<p>In response to paragraph 11.16 of the LIR, the Applicants have incorporated provision for adequate surface water management within the onshore cable corridor and CCS, details of which will be finalised within the final CoCP.</p> <p>As stated in <b>Table 20.3, Chapter 20</b> of the ES (APP-068), CCS and temporary works areas within the onshore development area will comprise hardstanding of permeable gravel aggregate underlain by geotextile, or other suitable material to a minimum of 50% of the total area to minimise the area of open ground.</p> <p>Pursuant to Requirement 22 of the <b>draft DCO</b> (APP-023), a construction surface water and drainage management plan will be included within the final CoCP.</p>
<p><i>Paragraphs 11.18 to 11.30</i> <i>Adequacy of Applications / DCOs</i></p>	<p>In direct response to paragraph 11.24, the Applicants note that an assessment that takes into account a 40% increase in rainfall intensity due to climate change is not a requirement of the Suffolk Flood Risk Management Strategy and the accompanying Suffolk SuDS Design Principles (in Appendix A of the Suffolk Flood Risk Management Strategy).</p> <p>Given the above, and in response to the matters raised during the SoCG process, the Applicants are preparing a <b>SuDS Infiltration Technical Note</b> to be submitted to the Examinations at Deadline 2 (document reference ExA.AS-9.D2.V1), and an Outline Operational Drainage Management Plan to be submitted to the Examinations at Deadline 3.</p> <p>A sensitivity check has been carried out for a 1 in 100 year storm event with a 40% allowance for climate change to understand the implications for potential</p>



LIR topic	Applicants' Comments
	flood risk. This will be presented within the Outline Operational Drainage Management Plan to be submitted to the Examinations at Deadline 3.
<p><i>Paragraph 11.31 of the LIR</i></p> <p><i>Compliance with Local Policy</i></p> <p>Based on the information currently available, the schemes are not considered compliant with local policy for the reasons set out above.</p>	<p>The Applicants have engaged with the Councils through the SoCG process (see <b>Table 12</b> (REP1-072)). This has resulted in a number of requests for clarification which are detailed below.</p>
<p><i>Unnumbered paragraph following paragraph 11.31 of the LIR</i></p> <p><i>Further Work Required</i></p> <ul style="list-style-type: none"> <li>• Review the baseline environment assessed in the ESs in light of The Friston Surface Water Management Plan published June 2020.</li> <li>• Clarification that all impermeable areas are accounted for in the worst case scenario including the impermeable surface of the basins themselves.</li> <li>• Commitment to assess the impact on human receptors in Friston from the projects specifically looking at the watercourse located in the village and associated catchment.</li> <li>• Application of an increase in rainfall intensity due to climate change of 40%.</li> <li>• Commitment to undertake appropriate infiltration testing pre-construction and provide sufficient information prior to consent, to demonstrate that there is sufficient space within the Order Limits to accommodate infiltration features with a worst case infiltration rate. In addition to demonstrating that there is sufficient space within the Order Limits for attenuation features at an agreed discharge rate.</li> </ul>	<p>The Applicants are preparing a <b>SuDS Infiltration Technical Note</b> to be submitted to the Examinations at Deadline 2 (document reference ExA.AS-9.D2.V1).</p> <p>The Applicants are preparing an Outline Operational Drainage Management Plan, which will be submitted to the Examinations at Deadline 3. A review of the Friston Surface Water Management Plan published June 2020 will be included within the Outline Operational Drainage Management Plan.</p> <p>With regard to an assessment of impacts upon human receptors, the Operational Drainage Management Plan will secure measures which limit discharges to a controlled rate (equivalent to the greenfield runoff rate) and ensure that any redirected overland flow routes do not cause an increase in offsite flood risk. The Applicants therefore do not consider an assessment necessary.</p> <p>The Applicants will submit an updated <b>draft DCO</b> (APP-023) to the Examinations at Deadline 3.</p> <p>The Applicants will undertake appropriate infiltration testing pre-construction during the detailed design stage of the Projects.</p>



LIR topic	Applicants' Comments
<ul style="list-style-type: none"> <li>Update the draft DCOs to provide a separate new requirement in relation to operational surface water and foul drainage.</li> <li>Clarification on the content of the Outline CoCP in relation to matter highlighted in paragraph 11.19 above.</li> <li>Assign confidence values to the assessments undertaken in Volume 1, Chapter 20, as per EIA Methodology (6.1.5), Paragraph 59.</li> </ul>	
<p><b>12. Built heritage</b></p>	
<p><i>Paragraph 12.20 of the LIR</i></p> <p><i>Summary</i></p> <p>The Councils have identified harm in relation to the setting of the heritage assets which should be considered against paragraph 196 of the NPPF. It should also be considered against the relevant paragraphs of NPS EN-1 namely paragraphs 5.8.12 – 5.8.18 which state that there should be a presumption in favour of the conservation of designated heritage assets (5.8.14) and that the IPC should take into account the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets (5.8.13). The Councils consider that the Applicants' assessment of harm is flawed by their assessment of the extent of the setting of the designated heritage assets which is contrary to the definition in the NPPF and through the inflation of the benefits of the proposed mitigation measures. This has resulted in their assessment underplaying the level of harm the project would cause to the significance of a number of designated heritage assets.</p>	<p>The Applicants have submitted a <b><i>Draft SoCG: East Suffolk Council and Suffolk County Council</i></b> to the Examinations at Deadline 1 (REP1-072) which records matters agreed and not agreed in relation to cultural heritage between the parties. The Applicants are continuing to engage with the Councils regarding cultural heritage impacts associated with the Projects through the SoCG process.</p> <p>The Applicants note the Councils give emphasis to policies within the National Planning Policy Framework (NPPF). As Nationally Significant Infrastructure Projects (NSIPs), the Projects should be considered primarily against relevant policies contained in the National Policy Statements (NPSs), which the Councils go on to subsequently reference. The NPSs are given statutory emphasis through s104 of the Planning Act 2008.</p> <p>The Applicants do not consider that their assessment has downplayed the level of harm the Projects would cause to the significance of identified designated heritage assets. In order to produce an accurate assessment of the contribution of historical setting to significance, an independent expert (Headland Archaeology) was commissioned by the Applicants. The subsequent conclusions and narrative provided in <b><i>Chapter 24</i></b> of the ES (APP-072) are based on and supported by this independent study (<b><i>Appendix</i></b></p>



LIR topic	Applicants' Comments
	<p><b>24.7 Assessment of the Impact of Onshore Infrastructure in the Setting of Heritage Assets and Annexes</b> (APP-519)).</p> <p>The Applicants have submitted an <b>Archaeology and Cultural Heritage Clarification Note</b> to the Examinations at Deadline 1 (REP1-021), which provides further consideration of designated assets in light of Suffolk County Councils Rapid Historic Landscape Assessment (2019) which has been provided by the Councils since submission of the Applications. This clarification note addresses matters in relation to cultural heritage raised during the SoCG process.</p>
<p><i>Paragraph 12.21 of the LIR</i></p> <p><i>Compliance with Local Policy</i></p> <p>For the reasons set out in the summary the proposal is not considered compliant with local policy specifically Policies SCLP3.4, 11.3 and 11.4.</p>	<p>With regard to Policy SCLP3.4 and SCLP11.3, the Applicants note that a heritage impact assessment has been undertaken and submitted as part of the Applications, as presented within <b>Chapter 24 Archaeology and Cultural Heritage</b> of the ES (APP-072) and its associated appendices. The Applicants also note that Policy SCLP11.3 makes reference to the NPPF. As NSIPs, the Projects should be considered primarily in terms of the relevant NPSs.</p> <p>The Applicants note that the Councils consider that the Projects are not compliant with Policy SCLP11.4, but highlight the assessment presented within <b>Chapter 24</b> (APP-072) and its associated appendices, as well as the <b>Archaeology and Cultural Heritage Clarification Note</b> submitted to the Examinations at Deadline 1 (REP1-021).</p> <p>The Applicants are continuing to discuss matters with the Councils regarding archaeology and cultural heritage through the SoCG process.</p>



LIR topic	Applicants' Comments
<p><i>Paragraphs 12.22 to 12.24 of the LIR</i></p> <p><i>Compensation</i></p> <p>It is the Councils view that the effects on the settings and significance of the heritage assets identified previously cannot be adequately mitigated by virtue of the planting proposed. The developments will result in residual harm to the setting of a number of listed buildings. Given that it is not considered possible to directly mitigate the harm caused to the significance of these assets, the Councils have requested that the Applicants provide appropriate compensation to offset this heritage harm. The Councils have discussed with the Applicants the provision of a fund for heritage assets which would provide the opportunity for funding to be made available to pay for works to be undertaken to the affected heritage assets, particularly the church. The intention is that these works would contribute to the long-term conservation of these important designated heritage assets.</p> <p>The Councils have also recommended that the fund also contribute towards compensation measures in relation to the effects on archaeology (discussed in the next section of the LIR) and the historic landscape character of the locality. The historic landscape character of the substations site has been discussed within multiple sections of the LIR as it crosses over into a number of different topic areas including heritage, archaeology and landscape and visual.</p> <p>The Councils have been engaging with the Applicants on the matters raised above.</p>	<p>The Applicants note the need to balance potential landscape and visual impacts/mitigation and potential cultural heritage impacts/mitigation at the substation site through the mitigation planting associated with the implementation of a landscape management scheme. The Applicants consider that the planting proposals contained within the <b>Outline Landscape and Ecological Management Strategy</b> (OLEMS) (APP-584) and <b>Outline Landscape Mitigation Plan (Figure 29.11a)</b> (APP-401)) have had regard to the potential impacts upon both landscape and visual and cultural heritage receptors, and represents an appropriate balanced approach to mitigation impacts for each of these receptors. This matter remains under discussion with the Councils within the SoCG process (REP1-072).</p> <p>The Applicants have submitted an <b>Archaeology and Cultural Heritage Clarification Note</b> to the Examinations at Deadline 1 (REP1-021), which provides further consideration of designated assets in light of new information received since submission of the Applications (namely the Rapid Historic Landscape Assessment, as presented within Appendix 1 to the Councils Joint Local Impact Report). This clarification note addresses matters in relation to cultural heritage raised during the SoCG process</p> <p>The Applicants are currently in discussion with the Councils with regard to these matters.</p>



LIR topic	Applicants' Comments
<p><i>Paragraphs 12.25 to 12.26 of the LIR</i> <i>Further Work and Compensation Required</i></p> <p>Notwithstanding the Councils concerns regarding the significance of the impact on a number of the listed buildings at Friston, the Councils recognise that this is a difference of professional opinion which there is not likely to be further agreement on. The Councils however request that further work be undertaken by the Applicants in relation to the historic character of the landscape at Friston specifically considering the historic parish/Hundred boundary.</p> <p>The Councils also request that the Applicants provide appropriate compensation in acknowledgement of the residual impacts caused by the projects on the heritage assets.</p>	<p>The Applicants have submitted an <b>Archaeology and Cultural Heritage Clarification Note</b> to the Examinations at Deadline 1 (REP1-021), which includes a review of the historic landscape character of Friston and further consideration of the historic parish / Hundred boundary.</p> <p>Separately the Applicants are in discussions with the Councils regarding potentially providing contributions to ESC to support additional enhancement measures in relation to cultural heritage matters.</p>
<b>13. Archaeology</b>	
<p><i>Paragraph 13.24 of the LIR</i> <i>Compliance with Local Policy</i></p> <p>The submitted archaeological information falls short of the level of detail required and contrary to the advice provided to the Applicants by the County Archaeology Service and therefore is contrary to local policy.</p>	<p>The Applicants highlight that considerable archaeology work (additional to the information presented within the ES) has been undertaken since submission of the Applications. The Applicants have submitted the following relevant documents to the Examinations at Deadline 1:</p> <ul style="list-style-type: none"> <li>• <b>Pre-Construction Trial Trenching Report</b> (REP1-024);</li> <li>• <b>Onshore Archaeology: Geophysical Survey Report (Parts 1 to 9)</b> (REP1-025 to REP1-033); and</li> <li>• <b>Onshore Archaeology: Earthworks Report</b> (REP1-034).</li> </ul>



LIR topic	Applicants' Comments
	<p>The Applicants note that there is no specific requirement in the relevant local policy (Policy SCLP11.3 or Policy SCLP11.4 of the Suffolk Coastal Local Plan) for substantial intrusive archaeological survey work or coverage to be undertaken pre-Application. As described in <b>section 4</b> of the <b>Archaeology and Cultural Heritage Clarification Note</b> submitted to the Examinations at Deadline 1 (REP1-021), the Applicants have committed to sampling 5% of the onshore development area via intrusive trial trenching.</p>
<p><i>Unnumbered paragraph following paragraph 13.24 of the LIR</i></p> <p><i>Further Work Required</i></p> <ul style="list-style-type: none"> <li>• Demonstration of consideration of the archaeological significance of the Hundred Boundary as part of a cross-disciplinary appraisal which looks at the varied heritage significances of it as a non-designated asset.</li> <li>• Development of a programme of outreach work through S111, to include community engagement with mitigation for impacts on the Hundred Boundary</li> <li>• Submission of the reports from the Earthwork Survey and Targeted Upfront Trial Trenched Evaluation</li> <li>• Amendment to the Outline WSI (see Appendix 2 and SOCG)</li> <li>• Amendments to the OPCAEP (see Appendix 2 and SOCG)</li> <li>• Amendment of wording of DCO Requirements 19 and 20 (see Appendix 2 and SOCG)</li> <li>• Clearer indications of timescales for archaeological work in high level project timescales</li> </ul>	<p>The Applicants have submitted the following documents to the Examinations at Deadline 1:</p> <ul style="list-style-type: none"> <li>• <b>Archaeology and Cultural Heritage Clarification Note</b> (REP1-021);</li> <li>• Updated <b>Outline Pre-Commencement Archaeological Execution Plan</b> (document reference 8.2);</li> <li>• <b>Pre-Construction Trial Trenching Report</b> (REP1-024);</li> <li>• <b>Onshore Archaeology: Geophysical Survey Report (Parts 1 to 9)</b> (REP1-025 to REP1-033); and</li> <li>• <b>Onshore Archaeology: Earthworks Report</b> (REP1-034).</li> </ul> <p>The Applicants will consider the changes requested by the Councils and will submit an updated <b>draft DCO</b> (APP-023) and an updated <b>Outline WSI</b> (APP-582) to the Examinations at Deadline 3.</p> <p>The Applicants are currently in discussion with the Councils with regard to these matters.</p> <p>As per the <b>Draft SoCG: East Suffolk Council and Suffolk County Council</b> submitted to the Examinations at Deadline 1 (REP1-072), the Applicants have committed to further pre-construction archaeological surveys (trial trenching)</p>





LIR topic	Applicants' Comments
<ul style="list-style-type: none"> <li>• Metal detecting and trial trenched evaluation, particularly around the crossing point near Grove Wood and more systematic archaeological evaluation</li> <li>• Advance proposals for early fuller and systematic archaeological evaluation as best practice to characterise archaeological remains and inform logistics and timescales (dialogue captured in the Archaeology SoCG).</li> </ul>	<p>with SCC Archaeological Service which are anticipated to commence in 2021 (the scope of which is under discussion).</p>
<p><b>14. Design and Masterplan</b></p>	
<p><i>Paragraph 14.19 of the LIR</i> <i>Compliance with Local Policy</i></p> <p>The Councils do not consider that the applications as submitted comply with local policy which emphasises the need for development to relate well to the scale and character of its surroundings. There is insufficient commitment to minimise the scale of the substations or address the known future intentions of the site. The Councils also consider that the options for infrastructure consolidation have not been fully explored.</p>	<p>The Applicants note that no stage of Work No. 30 (onshore substation) — may be commenced until final details regarding the design (including layout, scale and external appearance) of the onshore substations have been submitted to and approved by the relevant planning authority pursuant to Requirement 12(1) of the <b>draft DCO</b> (APP-023). Such details must accord with the <b>Outline Onshore Substation Design Principles Statement</b> (APP-585) in terms of Requirement 12(2).</p> <p>Requirement 12(6) of the <b>draft DCO</b> (APP-023) provides that no stage of the national grid substation works may commence until details of the layout, scale and external appearance of the national grid substation have been submitted to and approved by the relevant planning authority. The Applicants submitted an <b>Outline National Grid Substation Design Principles Statement</b> to the Examinations at Deadline 1 (REP1-046). An updated <b>draft DCO</b> will be submitted at Deadline 3, and this will amend Requirement 12 to provide that the final details of the layout, scale and external appearance of the National Grid substation must accord with the <b>Outline National Grid Substation Design Principles Statement</b>.</p> <p>As per the <b>Draft SoCG: East Suffolk Council and Suffolk County Council</b> submitted to the Examinations at Deadline 1 (REP1-072), the Applicants note that the DCO would authorise the Projects within specified maximum parameters, although it is noted that the <b>Outline Onshore Substation</b></p>



LIR topic	Applicants' Comments
	<p><b>Design Principles Statement</b> (APP-585) and <b>Outline National Grid Substation Design Principles Statement</b> (submitted at Deadline 1 (REP1-046)) provide for various design principles, including a statement that the onshore substations should be sensitively located, with visual impacts minimised as far as possible by the use of appropriate design, building materials, shape, layout, coloration and finishes.</p>
<p><i>Unnumbered paragraph following paragraph 14.19 of the LIR</i></p> <p><i>Further Work Required</i></p> <ul style="list-style-type: none"> <li>• Outline Onshore Substation Design Principles Statement <ul style="list-style-type: none"> <li>○ Submission of an outline Onshore Substation Design Principles Statement for the National Grid infrastructure either through an update to the current document or through a separate document.</li> <li>○ Commitment within the Outline Onshore Substation Design Principles Statement for both the Applicants' substations and also the National Grid infrastructure to make every effort to reduce the size and scale of the substations during the post consent refinement process.</li> <li>○ Expansion of the document to include further details regarding the design process and engagement measures.</li> </ul> </li> <li>• Amendment to the wording of Requirement 12(6) in the draft DCOs to include the need for the design details of the National Grid infrastructure to comply with the Outline Onshore Substation Design Principles Statement relevant to this infrastructure.</li> <li>• Provision of an assessment of the use of a GIS National Grid substation.</li> </ul>	<p>As per the <b>Draft SoCG: East Suffolk Council and Suffolk County Council</b> submitted to the Examinations at Deadline 1 (REP1-072), the Applicants note that the DCO would authorise the Projects within specified maximum parameters. The <b>Outline Onshore Substation Design Principles Statement</b> (APP-585) and <b>Outline National Grid Substation Design Principles Statement</b> (submitted at Deadline 1 (REP1-046)) provide for various design principles, including a statement that the onshore substations should be sensitively placed, with visual impacts minimised as far as possible by the use of appropriate design, building materials, shape, layout, coloration and finishes.</p> <p>The Applicants have submitted an <b>Outline National Grid Substation Design Principles Statement</b> to the Examinations at Deadline 1 (REP1-046). The Applicants will submit an updated <b>draft DCO</b> (APP-023) to the Examinations at Deadline 3 which will provide that the details of the layout, scale and external appearance of the National Grid substation must accord with the <b>Outline National Grid Substation Design Principles Statement</b> (REP1-046).</p> <p>With regard to an assessment of the use of a GIS National Grid substation, the Applicants refers to their response to questions 1.0.5 and 1.0.12 of the Examining Authority's Written Questions (REP1-105).</p>



LIR topic	Applicants' Comments
<ul style="list-style-type: none"> <li>• Exploration of the opportunity to consolidate and share infrastructure in association with the BEIS OTNR.</li> <li>• Acknowledgement of the known future projects with agreement from NG-ESO to connect to the grid at Friston, in the CIAs. These connections should be taken into account within the siting and design considerations of the proposed substations.</li> </ul>	<p>As outlined in the <b>Project Update Note</b> submitted at Deadline 2 (document reference ExA.AS-4.D2.V1), the Applicants can now confirm that should both the East Anglia ONE North project and the East Anglia TWO project be consented and then built sequentially, when the first project goes into construction, the ducting for the second project will be installed along the whole of the onshore cable route in parallel with the installation of the onshore cables for the first project. This will include installing ducting using a trenchless technique at the landfall for both Projects at the same time. Further information will be provided at Deadline 3.</p> <p>The Applicants note an inclusion within the <b>Draft SoCG: National Grid Electricity Transmission Plc</b> (NGET) submitted to the Examinations at Deadline 1 (REP1-064) that only National Grid infrastructure required to connect the Projects to the national electricity grid is included within the Applications (specifically Work Nos. 34 and 38 to 43 inclusive). As such, the Applicants do not consider it necessary or appropriate to include future projects with an as-yet unconfirmed grid connection agreement at Friston within the CIAs.</p> <p>The selection of other projects to be considered in the assessment of cumulative impacts followed The Planning Inspectorate Advice Note 17: Cumulative effects assessment relevant to nationally significant infrastructure projects. Following the guidance in Advice Note 17, the below projects were not considered in the CIA because at the time the Project CIAs were written there was inadequate detail upon which to base any meaningful assessment (with no information on, for example, the project design, and timescales):</p> <ul style="list-style-type: none"> <li>• Nautilus;</li> <li>• EuroLink;</li> <li>• Greater Gabbard Offshore Windfarm Extension; and</li> </ul>



LIR topic	Applicants' Comments
	<ul style="list-style-type: none"> <li>• Galloper Offshore Windfarm Extension.</li> </ul> <p>Whilst it is correct that some information is available in the public domain (i.e. on the TEC register) which currently suggests that these projects may connect near Leiston, no detailed plans, programmes or project descriptions exist which would enable meaningful assessment. This was the case at submission of the Applications in October 2019 and remains the case today.</p> <p>Each of the proposed projects will require its own EIA and as part of its consents process will need to undertake a cumulative assessment. Each of the above projects will therefore consider the Projects (if relevant) in each of their respective EIAs as they progress through the planning process.</p>
<p><b>15. Landscape and Visual</b></p>	
<p><i>Paragraphs 15.10 to 15.21</i> <i>The Character of the Landscape at the Substation Site</i></p>	<p>In direct response to paragraph 15.10 of the LIR, the Applicants contest the claim that they have not fully understood the character and significance of landscape features at the location of the onshore substations, particularly regarding historic landscape character. The Applicants have undertaken extensive work on this matter and consider that the baseline presented within <b>Chapter 29 Landscape and Visual Impact Assessment</b> (APP-077) is a representative and robust description of the existing environment in terms of landscape and visual features. The Applicants have submitted an <b>Archaeology and Cultural Heritage Clarification Note</b> to the Examinations at Deadline 1 (REP1-021), which gives further consideration to the historic landscape character of in the location of the onshore substations in light of new information becoming available following submission of the Applications.</p>
<p><i>Paragraphs 15.27 to 15.29</i> <i>The Substation Visualisations</i></p>	<p>In direct response to paragraph 15.29 of the LIR, the Applicants consider that extensive planting has been proposed via the <b>Outline Landscape Mitigation</b></p>



LIR topic	Applicants' Comments
	<p><b>Planting</b> (<b>Figure 29.11a</b> (APP-401) and <b>Figure 29.11b</b> of the ES (APP-402)) and through the <b>OLEMS</b> (APP-584).</p>
<p><i>Paragraph 15.36 of the LIR</i></p> <p><i>Compliance with Local Policy</i></p> <p>The projects, by virtue of their significant landscape and visual effects, are not considered compliant with local policy.</p>	<p>The Applicants have submitted a <b>Draft SoCG: East Suffolk Council and Suffolk County Council</b> to the Examinations at Deadline 1 (REP1-072), which records matters agreed and not agreed in relation to LVIA between the parties. The Applicants are continuing to engage with the Councils regarding LVIA effects associated with the Projects through the SoCG process.</p> <p>The Applicants note the relevant policy within the Suffolk Coastal Local Plan (Policy SCLP10.4). Requirement 14 and Requirement 15 of the <b>draft DCO</b> (APP-023) secure the preparation and implementation of a landscape management plan which must accord with the <b>OLEMS</b> (APP-584) and be submitted to and approved by the relevant planning authority prior to any stage of the onshore works commencing. It is considered this approach provides the necessary assurances that the Projects have taken full regard of the design and scale of permanent onshore infrastructure in terms of its landscape and visual effects and provides the Councils authorisation of the final design.</p> <p>The Applicants consider that the Applications have complied with the provisions set out within section 5.9 of the Overarching NPS for Energy (EN-1).</p>
<p><i>Paragraph 15.37 of the LIR</i></p> <p><i>Further Work Required</i></p> <p>The Councils considered that the following additional work or measures are required:</p>	<p>The Applicants have submitted an <b>Archaeology and Cultural Heritage Clarification Note</b> to the Examinations at Deadline 1 (REP1-021), which provides clarification on the historic landscape character and features taking into account the interplay between the different disciplines.</p>



LIR topic	Applicants' Comments
<ul style="list-style-type: none"> <li>• Provision of a clarification note on the historic landscape character and features taking into account the interplay between the different disciplines.</li> <li>• Submission of updated visualisations illustrating a more realistic depiction of 15 years of planting growth.</li> <li>• Commitment to the use of adaptive maintenance and aftercare in relation to the substations' mitigation planting and replacement woodland planting.</li> <li>• Commitment to the provision of strategic offsite planting and a fund to provide private planting to offset and compensate for the significant residual impacts identified in the ESs.</li> <li>• Commitment to provide details regarding the long-term management of the site which would be secured through the DCOs. This would involve the commitment to produce a long-term management plan and the commitment to establish of a community liaison group.</li> <li>• The commitments sought in relation to Section 14 (Design) are also relevant.</li> </ul>	<p>A selection of updated visualisations, to provide an illustration of a more realistic depiction of mitigation planting growth at 15-years post-construction will be submitted to the Examinations at Deadline 3.</p> <p>The Applicants will consider the changes requested by the Councils and will submit an updated <b>draft DCO</b> (APP-023) and updated <b>OLEMS</b> (APP-584) to the Examinations at Deadline 3, which will reflect the status of discussions on landscape management with the Councils.</p> <p>The Applicants are in discussions with ESC regarding potentially providing contributions to ESC to support additional enhancement measures in relation to landscape matters.</p>
<p><b>16. Seascape and Visual Effects</b></p>	
<p><i>Paragraph 16.14 of the LIR</i></p> <p><i>Compliance with Local Policy</i></p> <p>The development of EA2 by virtue of the significant adverse effects identified in the ES on the AONB is not considered compliant with local policy.</p>	<p>The Applicants have submitted a <b>Draft SoCG: East Suffolk Council and Suffolk County Council</b> to the Examinations at Deadline 1 (REP1-072), which records matters agreed and not agreed in relation to SLVIA between the parties. The Applicants are continuing to engage with the Councils regarding SLVIA effects associated with the Projects through the SoCG process.</p>



LIR topic	Applicants' Comments
<p><i>Paragraphs 16.15 to 16.17 of the LIR</i></p> <p><i>Further Work Required</i></p> <p>The Applicants should update their SLVIAs to take into consideration the reduction in the tip height of the turbines if the effect on the significance of the impacts of the projects is to be fully considered.</p> <p>The Applicants should engage with Natural England regarding further modifications necessary to the height and layout of EA2.</p> <p>The Councils will continue to engage with the Applicant for EA2 to seek appropriate compensation for the significant impacts identified as a result of the EA2 project.</p>	<p>The Applicants are currently engaging and will continue to engage with Natural England regarding the SLVIA impacts identified and the mitigation measures available.</p> <p>The Applicants are in discussions with ESC regarding supporting measures in relation to the AONB.</p>
<p><b>17. Land Use</b></p>	
<p><i>Paragraph 17.10 of the LIR</i></p> <p><i>Compliance with Local Policy</i></p> <p>The Councils acknowledge that the ESs consider the effect of the projects on land use and agricultural land which is required by policy. The Councils however consider that through design choices and coordinated methods of construction, impacts on land uses and agricultural land could be reduced. Notwithstanding these points, to the best of the Councils understanding, the measures outlined in the Outline CoCP and secured through the final CoCP will help to minimise the impacts on agricultural activities.</p>	<p>The Applicants have submitted a <b><i>Draft SoCG: East Suffolk Council and Suffolk County Council</i></b> to the Examinations at Deadline 1 (REP1-072), which records matters agreed and not agreed in relation to land use between the parties.</p> <p>The Applicants have also submitted a <b><i>Land Use Clarification Note</i></b> to the Examinations at Deadline 1 (REP1-022), which provides further clarification on matters raised during the SoCG process.</p> <p>The Applicants are continuing to engage with the Councils regarding potential land use impacts associated with the Projects through the SoCG process.</p>
<p><i>Paragraph 17.11 of the LIR</i></p> <p><i>Further Work Required</i></p>	<p>The Applicants have submitted a <b><i>Land Use Clarification Note</i></b> to the Examinations at Deadline 1 (REP1-022).</p>



LIR topic	Applicants' Comments
<p>The Councils will review the clarification note regarding the impacts on agricultural land once it is received. The Councils will also continue to seek commitment from the Applicants to:</p> <ul style="list-style-type: none"> <li>• Explore all opportunities for greater consolidation of infrastructure,</li> <li>• Reduce the size and scale of the substations, including the commitment to the use of GIS for the National Grid infrastructure.</li> <li>• Provide greater coordination within the delivery of the projects if consented.</li> </ul>	<p>It should be noted, as outlined in the <b>Project Update Note</b> submitted at Deadline 2 (document reference ExA.AS-4.D2.V1), the Applicants have committed to a reduction in the maximum footprint of each onshore substation to 190m x 170m. This represents an approximate 10% reduction in the development footprint of each onshore substation. In addition, the Applicants can now also confirm that should both the East Anglia ONE North project and the East Anglia TWO project be consented and then built sequentially, when the first project goes into construction, the ducting for the second project will be installed along the whole of the onshore cable route in parallel with the installation of the onshore cables for the first project. This will include installing ducting using a trenchless technique at the landfall for both Projects at the same time. Further information on both of these updates will be provided at Deadline 3.</p> <p>As per the <b>Draft SoCG: East Suffolk Council and Suffolk County Council</b> submitted to the Examinations at Deadline 1 (REP1-072), the Applicants note that whilst there are aspects of the design which will be subject to further consultation and approval, the <b>draft DCO</b> (APP-023) authorises the Projects within specified parameters and it is not appropriate for all such parameters to be subject to uncertainty associated with the requirement for further approvals.</p>
<p><b>18. Public Rights of Way</b></p>	
<p><i>Paragraph 18.21 of the LIR</i> <i>Compliance with Local Policy</i></p> <p>The importance of the PRoW network is recognised in local policy, the impacts of the development on the network has been set out above. As the proposals currently stand the applications are not considered compliant with</p>	<p>The Applicants have submitted a <b>Draft SoCG: East Suffolk Council and Suffolk County Council</b> to the Examinations at Deadline 1 (REP1-072), which records matters agreed and not agreed in relation to Public Rights of Way (PRoW) between the parties.</p>





LIR topic	Applicants' Comments
<p>local policy in respect of protecting and enhancing the PRoW provision. The impacts on the amenity and quality of the user experience has not been fully assessed or mitigated.</p>	<p>The Applicants have also submitted a <b>Public Rights of Way Clarification Note</b> to the Examinations at Deadline 1 (REP1-049), which provides further clarification on matters raised during the SoCG process.</p> <p>The Applicants are continuing to engage with the Councils regarding potential PRoW impacts associated with the Projects through the SoCG process.</p>
<p><i>Paragraph 18.22 of the LIR</i> <i>Further Work/Mitigation Required</i></p> <p>The Councils continuing to engage with the Applicants regarding the impacts of the projects both during construction and operation on the PRoW network to seek further mitigation / compensatory measures, should the DCOs be consented.</p>	<p>The Applicants are currently in discussion with the Councils with regard to these matters.</p>
<p><b>19. Noise and Vibration</b></p>	
<p><i>Paragraphs 19.32 to 19.33 of the LIR</i> <i>Compliance with Local Policy</i></p> <p>The Councils have concerns regarding both the construction and operation noise associated with the project and cumulatively with both projects. It is not considered that the applications comply with local policy. The developments alone and in-combination would potentially have significant adverse impacts on residential properties, their amenity, and the surrounding environment.</p> <p>As discussed in Paras 19.29, 19.30 and 19.32, the application fails to address and therefore satisfy the assessment requirements and noise aims of the Overarching National Policy Statement for Energy (EN-1).</p>	<p>The Applicants have engaged extensively with the Councils regarding noise and vibration through the SoCG process since submission of the Applications. The Applicants have submitted the <b>Draft SoCG: East Suffolk Council and Suffolk County Council</b> to the Examinations at Deadline 1 (REP1-072), which records matters agreed and not agreed in relation to noise and vibration between the parties.</p> <p>The Applicants have submitted a <b>Noise and Vibration Clarification Note</b> to the Examinations at Deadline 2 to provide further clarification on a number of matters raised through the SoCG process (document reference ExA.AS-8.D2.V1). The Applicants will submit a Noise Modelling Clarification Note to the Examinations at Deadline 3 which will include information on the size and</p>



LIR topic	Applicants' Comments
	<p>arrangement of modelled noise sources, mitigation measures incorporated into the noise model and at the dominant noise source for each receptor.</p> <p>The Applicants note this section of the LIR refers to Appendix 4, comprising a note from ESC's noise consultants Adrian James Acoustics Ltd. The Applicants intend to respond in full to Appendix 4 at Deadline 3 of the Examinations, but have provided initial, high-level comments in <b>Section 27</b> of this table.</p>
<p><i>Paragraphs 19.34 to 19.35 of the LIR</i></p> <p><i>Further Work Required</i></p> <p>In terms of construction noise, the Councils request that the Outline CoCP is updated to include:</p> <ul style="list-style-type: none"> <li>• Commitment that the "Construction Phase Noise Management Plan" described in the outline CoCP will be informed by an updated assessment of construction noise based on finalised construction proposals as and when they are available.</li> <li>• Commitment to providing specific mitigation measures for the areas where the onshore Order Limits and hence construction works are in close proximity to residential properties. Locations include properties south of Sizewell Gap Road, Gypsy and Fitches Lane and immediately around the substations site in Friston.</li> <li>• Commitment that proposals for construction noise monitoring will be included in the CoCP and would be agreed with the local planning authority.</li> <li>• Commitment that prior to undertaking any essential night-time working, the timing and duration of such works will be approved by ESC through an agreed process to be included in the CoCP, including consideration of the noise and vibration impact where appropriate.</li> </ul>	<p>The Applicants will submit an updated <b>Outline CoCP</b> (APP-578) at Deadline 3.</p> <p>The Applicants note that construction noise mitigation measures are set out within the <b>Outline CoCP</b> (APP-578). The set of mitigation measures contained within the final CoCP will be informed by the noise assessment presented within <b>Chapter 25</b> of the ES (APP-073), which follows the Rochdale Envelope approach and assesses the worst-case construction noise.</p> <p>As per Requirement 22 of the <b>draft DCO</b> (APP-023), a final CoCP which accords with the <b>Outline CoCP</b> (APP-578) must be submitted to and approved by the relevant planning authority. Given the relevant planning authority must authorise the final CoCP, the Applicants consider this is an appropriate and robust mechanism to secure specific construction mitigation measures with regard to noise.</p> <p><b>Section 9.2</b> of the <b>Outline CoCP</b> (APP-578) sets out the construction noise monitoring proposed. The Applicants will undertake construction noise monitoring in the event of a noise complaint received.</p> <p>Regarding the Councils comment on essential night-time working, the Applicants note that construction hours are controlled through Requirement 23 and Requirement 24 of the <b>draft DCO</b> (APP-023). As provided in the wording</p>



LIR topic	Applicants' Comments
<p>In terms of operational noise, the Councils request that the Applicants undertake the further work identified/supplies the following additional information as previously offered:</p> <ul style="list-style-type: none"> <li>• Details of the layout and sizes of the difference noise sources modelled on both substations sites.</li> <li>• A break-down of the relative level of noise generated by the different sources at each receptor location.</li> <li>• Clarification on whether the reported A-weighted or Octave band source data reported for operational noise sources have been used in the noise model.</li> <li>• Results of noise modelling of National Grid substation.</li> <li>• 1/3 Octave measurement data from existing substations to substantiate the position that operational noise is not expected to contain tonal elements.</li> <li>• Confirmation of whether the effect of air humidity on corona discharge noise from existing power transmission lines was considered during the noise survey data analysis process.</li> <li>• Reconsideration of the identified background level for the site.</li> <li>• Assessment of the effect of operational noises on the amenity and character of the areas that these sounds would be introduced into.</li> <li>• Assessment of the impact of operational noise on ecological receptors.</li> <li>• Further consideration should be given to noise mitigation options which could be utilised.</li> <li>• Amendment to the wording of Requirements 26 and 27 to set the noise limit at or below background levels and to include an additional monitoring receptor to the north of the site.</li> </ul>	<p>of these Requirements, the approval of the timing and duration of such works must be approved by the relevant planning authority in writing in advance.</p> <p>The Applicants have submitted a <b>Noise and Vibration Clarification Note</b> to the Examinations at Deadline 2 (document reference ExA.AS-8.D2.V1) and will submit a Noise Modelling Clarification Note to the Examinations at Deadline 3. These notes will address the following matters:</p> <ul style="list-style-type: none"> <li>• Details of the layout and sizes of the difference noise sources modelled on both onshore substations locations.</li> <li>• Identification of the dominant noise source(s) within the onshore substations.</li> <li>• Clarification on whether the reported A-weighted or Octave band source data reported for operational noise sources have been used in the noise model.</li> <li>• Results of noise modelling of National Grid substation.</li> <li>• Confirmation of whether the effect of air humidity on corona discharge noise from existing power transmission lines was considered during the noise survey data analysis process.</li> <li>• Assessment of the effect of operational noises on the amenity and character of the areas that these sounds would be introduced into.</li> <li>• Assessment of the impact of operational noise on ecological receptors.</li> <li>• Further consideration should be given to noise mitigation options which could be utilised.</li> </ul>



LIR topic	Applicants' Comments
<b>20. Socio-Economic</b>	
<p><i>Paragraph 20.31 of the LIR</i> <i>Compliance with Local Policy</i></p> <p>A number of potential socio-economic benefits have been highlighted above however the Councils remain concerned regarding the impacts of the projects on visitor perceptions. Local policy recognises the importance of tourism to the district economy and therefore further work is required to be undertaken by the Applicants in light of the findings of the DMO survey (2019). It is essential that the cumulative impacts of the projects are adequately mitigated and/or compensated.</p>	<p>The Applicants have submitted a <b>Draft SoCG: East Suffolk Council and Suffolk County Council</b> to the Examinations at Deadline 1 (REP1-072), which records matters agreed and not agreed in relation to socio-economics between the parties.</p> <p>The Applicants have noted the final adopted Suffolk Coastal Local Plan and have submitted a <b>Socio-Economics and Tourism Clarification Note (SZC CIA)</b> to the Examinations at Deadline 1 (REP1-036), which provides further clarification on matters relating to socio-economics raised during the SoCG process.</p>
<p><i>Paragraph 20.32 of the LIR</i> <i>Further Work/Mitigation Required</i></p> <p>The Councils consider that there is a need to develop and undertake marketing activity to attract increased numbers of overnight visitors to the area. The Councils will continue to engage with the Applicants on this matter.</p>	<p>The Applicants are currently in discussion with the Councils with regard to this matter.</p>
<b>21. Traffic and Transport</b>	
<p><i>Paragraph 21.123</i> <i>Obligations</i></p> <p>The Councils consider that the following contributions are necessary to mitigate the impacts of this project. These should be secured through a S106 agreement.</p>	<p>The Applicants do not consider that a S106 agreement is necessary for such matters. The Applicants are in ongoing discussions with the Councils as regards traffic and transport matters. These matters will be dealt with through appropriate mechanisms including the finalisation of the Construction Traffic Management Plan, agreement under Section 278 of the Highways Act 1980 where appropriate, traffic regulation where required, and a planning performance agreement between the Applicants and the Councils.</p>



LIR topic	Applicants' Comments
<ul style="list-style-type: none"> <li>• A contribution towards the additional costs resulting from routine cyclic and emergency highway maintenance costs being restricted to out of hours working times on the applicant's freight route.</li> <li>• An obligation, secured through the OCTMP, to undertake visual and structural surveys of all routes intended to carry construction HGVs prior to, during and after the construction period and to undertake or pay for the highway authority to undertake any such work that is deemed necessary to return the carriageway to its original condition.</li> <li>• A contribution for review of submitted materials for monitoring the CTMP and for monitoring the TP for the life of the project.</li> <li>• The sum of 7.5% of the total off-site highway works on or before the commencement of construction, to be applied to cover the full audit, legal costs, S278 agreements, dedication of land into highway, land compensation events and supervision fees for the transport schemes to be implemented by the Applicants under the DCOs.</li> <li>• A contribution towards changes to the speed limit at the A12/A1094 Friday Street junction and changes in the speed enforcement equipment. The cost of temporary speed limits will be recovered by other means.</li> <li>• Reimbursement of the Highway Authority for all costs associated with assessments of highway structures and the moving, removing, installed and reinstalling street furniture, streetlights, traffic signals, traffic islands and all other highway infrastructure including structures necessary for safe movement of AIL's and any associated traffic management and temporary traffic orders.</li> <li>• Funding for any monitoring and necessary mitigation required for the A12 Stratford St Andrew AQMA.</li> </ul>	<p>The Applicants are in discussions with the Council regarding the need or otherwise, or air quality monitoring at the A12 Stratford St Andrew AQMA.</p>
<p><i>Paragraph 21.124 of the LIR</i></p>	<p>The Applicants do not consider that a S106 agreement is necessary for such matters. The Applicants are in ongoing discussions with the Councils as</p>



LIR topic	Applicants' Comments
<p><i>Compliance with Local Policy</i></p> <p>The Councils consider that the proposals are inadequate in a number of ways including:</p> <ul style="list-style-type: none"> <li>a) the lack of planning obligations or similar measures to allow the Highway Authority to undertake measures necessary to mitigate the impacts of the development , to deliver the highway works and monitor the management plans provision for a planning obligation to cover the cost of necessary highways works;</li> <li>b) the cumulative impacts of the projects in terms of offsite highway works, operation, decommissioning and port related activities and with respect to Sizewell C have not been adequately assessed.</li> <li>c) the proposals to reduce the southbound A12 speed limit to 40 mph at the Friday Street A12/A1094 junction together with new rumble strips and an adjustment to the existing speed camera would not be adequate to avoid an increase in accidents and that a new roundabout is required, and</li> <li>d) the transport impacts of future development of the substation, for example access by HGVs or AILs have not been considered</li> <li>e) That the use of GEART without adjustment for local or cumulative factors may not give a true analysis of impact and does not allow for perception of impacts by local residents and road users.</li> </ul> <p>For the reasons set out above the proposals are not compliant with local policy.</p>	<p>regards traffic and transport matters. These matters will be dealt with through appropriate mechanisms including the finalisation of the Construction Traffic Management Plan, agreement under Section 278 of the Highways Act 1980 where appropriate, traffic regulation where required, and a planning performance agreement between the Applicants and the Councils.</p> <p>The Applicants consider that the mitigation proposed for the Friday Street A12/A1094 junction within <b>Chapter 26</b> of the ES is appropriate, although note that this matter remains under discussion with the Councils (see REP1-072).</p> <p>The Applicants have submitted a <b>Draft SoCG: East Suffolk Council and Suffolk County Council</b> to the Examinations at Deadline 1 (REP1-072), which records matters agreed and not agreed in relation to traffic and transport between the parties.</p> <p>The Applicants have submitted a <b>Traffic and Transport: Deadline 1 Clarification Note</b> to the Examinations at Deadline 1 (REP1-048), which provides further clarification on certain matters relating to traffic and transport raised during the SoCG process including the use of the GEART for the assessment methodology. Appendix A of the <b>Traffic and Transport: Deadline 1 Clarification Note</b> includes figures illustrating the proposed AIL route options associated with the Projects.</p> <p>The Applicants have also submitted a <b>Sizewell C Cumulative Impact Assessment (Traffic and Transport) Clarification Note</b> to the Examinations at Deadline 2 (document reference ExA.AS-6.D2.V1), which provides further clarification on certain other matters relating to traffic and transport raised during the SoCG process.</p> <p>The selection of other projects to be considered in the assessment of cumulative impacts followed The Planning Inspectorate Advice Note 17: Cumulative effects assessment relevant to nationally significant infrastructure</p>



LIR topic	Applicants' Comments
	<p>projects. Following the guidance in Advice Note 17, the below projects were not considered in the CIA because at the time the Project CIAs were written there was inadequate detail upon which to base any meaningful assessment (with no information on, for example, the project design, and timescales):</p> <ul style="list-style-type: none"> <li>• Nautilus;</li> <li>• EuroLink;</li> <li>• Greater Gabbard Offshore Windfarm Extension; and</li> <li>• Galloper Offshore Windfarm Extension.</li> </ul> <p>Whilst it is correct that some information is available in the public domain (i.e. on the TEC register) which currently suggests that these projects may connect near Leiston, no detailed plans, programmes or project descriptions exist which would enable meaningful assessment. This was the case at submission of the Applications in October 2019 and remains the case today.</p> <p>Each of the proposed projects will require its own EIA and as part of its consents process will need to undertake a cumulative assessment. Each of the above projects will therefore consider the Projects (if relevant) in each of their respective EIAs as they progress through the planning process.</p> <p>The Applicants expect to submit a Traffic and Transport: Deadline 3 Clarification Note to the Examinations at Deadline 3, which is intended to address any remaining matters relating to traffic and transport raised during the SoCG process.</p>
<b>22. Minerals &amp; Waste</b>	
<p><i>Paragraph 22.16 of the LIR</i> <i>Compliance with Local Policy</i></p>	<p>No comment.</p>



LIR topic	Applicants' Comments
<p>As outlined within the above text, the development is considered compliant with local policy.</p>	
<p><b>23. Water Quality and Resources</b></p>	
<p><i>Paragraph 23.7 of the LIR</i> <i>Compliance with Local Policy</i></p> <p>It is likely that local policy compliance can be achieved post consent through the agreement and implementation of an appropriately detailed CoCP. The Councils would however like to see the Applicants identify whether it is possible to re-use surface water runoff to reduce the water supply needs.</p>	<p>The Applicants have submitted a <b>Draft SoCG: East Suffolk Council and Suffolk County Council</b> to the Examinations at Deadline 1 (REP1-072), which records matters agreed and not agreed in relation to water resources between the parties.</p> <p>The Applicants will highlight the benefits of-using surface water runoff to reduce the water supply needs within the <b>Outline CoCP</b> (APP-578) but note that this will not be an obligation given the need to ensure capacity within the surface water management system for future rainfall.</p>
<p><i>Paragraph 23.8 of the LIR</i> <i>Further Work Required</i></p> <p>The Councils would like the Applicants to consider opportunities to re-use surface water run-off to reduce the potential water needs in addition to provide further information to give the Councils confidence that there is sufficient space within the Order Limits to prioritise a SuDS for managing surface water.</p>	<p>The Applicants have submitted a <b>Draft SoCG: East Suffolk Council and Suffolk County Council</b> to the Examinations at Deadline 1 (REP1-072), which records matters agreed and not agreed in relation to water resources between the parties.</p> <p>The Applicants have prepared a <b>SuDS Infiltration Technical Note</b>, which has been submitted to the Examinations at Deadline 2 (document reference ExA.AS-9.D2.V1).</p> <p>The Applicants will highlight the benefits of re-using surface water runoff to reduce the water supply needs within the <b>Outline CoCP</b> (APP-578) but note that this will not be an obligation given the need to ensure capacity within the surface water management system for future rainfall.</p>





LIR topic	Applicants' Comments
<b>24. Appendix 1</b>	
<i>LIR Appendix 1 – Rapid Historic Landscape Assessment</i>	The Applicants have submitted an <b>Archaeology and Cultural Heritage Clarification Note</b> to the Examinations at Deadline 1 (REP1-021), which takes account of the Rapid Historic Landscape Assessment presented within Appendix 1 to the LIR.
<b>25. Appendix 2</b>	
<i>LIR Appendix 2 - Archaeology</i>	The Applicants have noted the Councils comments upon the <b>Outline WSI</b> (APP-582), <b>Outline Pre-Commencement Archaeological Execution Plan</b> (APP-597) and <b>draft DCO</b> (APP-023). An updated <b>Outline Pre-Commencement Archaeological Execution Plan</b> (APP-597) has been submitted to the Examinations at Deadline 1. The Applicants will submit an updated <b>Outline WSI</b> (APP-582) and <b>draft DCO</b> (APP-023) to the Examinations at Deadline 3.
<b>26. Appendix 3</b>	
<i>LIR Appendix 3 – Annotated Visualisations of Trees and Vegetation</i>	The Applicants will submit a Clarification Note to the Examinations at Deadline 3 in response to the information contained within Appendix 3 to the LIR.
<b>27. Appendix 4</b>	
<i>LIR Appendix 4 – Analysis of Background Noise Survey Data</i>	The Applicants will respond in full to the information within Appendix 4 to the LIR at Deadline 3.