



**SCOTTISHPOWER
RENEWABLES**

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on Responses to Examining Authority's Written Questions

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

AA	Appropriate Assessment
AADT	Annual Average Daily Traffic
ADD	Acoustic Deterrent Devices
AEOI	Adverse Effect on Integrity
AIL	Abnormal Indivisible Load
AIS	Air Insulated Switchgear
ALC	Agricultural Land Classification
ALO	Agricultural Liaison Officer
ANO	Air and Navigation Order
AONB	Area of Outstanding Natural Beauty
APP	Application Document
ATC	Automatic Traffic Counts
BCT	Bat Conservation Trust
BEIS	Department of Business Energy and Industrial Strategy
BMV	Best and Most Versatile
CCS	Construction Consolidation Sites
CfD	Contract for Difference
CIA	Cumulative Impact Assessment
CION	Connection and Infrastructure Options Note
COCP	Code of Construction Practice
dB	Decibels
DCO	Development Consent Order
DML	Deemed Marine Licence
DMO	Destination Management Organisation
EA	Environment Agency
EIA	Environmental Impact Assessment
EM	Explanatory Memorandum
EMP	Ecological Management Plan
ES	Environmental Statement
ESC	East Suffolk Council
ETG	Expert Topic Group
ExA	Examining Authority
FID	Final Investment Decision
FRA	Flood Risk Assessment
GEART	Guidelines for the Environmental Assessment of Road Traffic
GIS	Gas Insulated Switchgear
Ha	Hectares
HDD	Horizontal Directional Drilling
HE	Historic England
HGV	Heavy Goods Vehicle
HRA	Habitats Regulations Assessment
IPSIP	In Principle Site Integrity Plan
LAT	Lowest Astronomical Tide
LCA	Landscape Character Assessment
LCT	Landscape Character Type
LLFA	Lead Local Flood Authority
LMP	Landscape Management Plan
LPA	Local Planning Authority
LSE	Likely Significant Effects
LVIA	Landscape and Visual Impact Assessment



MCA	Marine Coastguard Agency
MCTC	Manual Classified Turning Counts
MHWS	Mean High Water Springs
MMMP	Marine Mammal Mitigation Protocol
MMO	Marine Management Organisation
MoU	Memorandum of Understanding
NALEP	The New Anglia Local Enterprise Partnership
NE	Natural England
NGET	National Grid Electricity Transmission
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
OAMP	Outline Access Management Plan
OCTMP	Outline Construction Traffic Management Plan
OFTO	Offshore Transmission Owner
OLEMS	Outline Landscape and Ecological Management Strategy
OMLP	Outline Management and Landscape Plan
OTP	Outline Travel Plan
PD	Procedural Decision
PEIR	Preliminary Environmental Impact Report
PEMP	Project Environmental Management Plan
PRoW	Public Right of Way
RAG	Red Amber Green
RLoS	Radar Line of Sight
RSPB	Royal Society for the Protection of Birds
RTD	Red Throated Diver
SAC	Special Area of Conservation
SCC	Suffolk County Council
SCCAS	Suffolk County Council Archaeology Service
SLVIA	Seascape, Landscape and Visual Impact Assessment
SMP	Shoreline Management Plan
SNS	Southern North Sea
SoCG	Statement of Common Ground
SPA	Special Protection Area
SPR	ScottishPower Renewables
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Urban Drainage System
SZC	Sizewell C
TWT	The Wildlife Trust
UK	United Kingdom
UKCP	United Kingdom Climate Projections
UXO	Unexploded Ordinance
VP	Viewpoint
WQ	Written Question
WR	Written Representation
WSI	Written Scheme of Investigation



Glossary of Terminology

Applicants	East Anglia TWO Limited / East Anglia ONE North Limited
Cable sealing end compound	A compound which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Cable sealing end (with circuit breaker) compound	A compound (which includes a circuit breaker) which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
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.
Construction operation and maintenance platform	A fixed offshore structure required for construction, operation, and maintenance personnel and activities.
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.
East Anglia TWO windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
European site	Sites designated for nature conservation under the Habitats Directive and Birds Directive, as defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017 and regulation 18 of the Conservation of Offshore Marine Habitats and Species Regulations 2017. These include candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas.
Generation Deemed Marine Licence (DML)	The deemed marine licence in respect of the generation assets set out within Schedule 13 of the draft DCO.
Horizontal directional drilling (HDD)	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
Inter-array cables	Offshore cables which link the wind turbines to each other and the offshore electrical platforms, these cables will include fibre optic cables.



Jointing bay	Underground structures constructed at intervals along the onshore cable route to join sections of cable and facilitate installation of the cables into the buried ducts.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
Link boxes	Underground chambers within the onshore cable route housing electrical earthing links.
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.
Marking buoys	Buoys to delineate spatial features / restrictions within the offshore development area.
Monitoring buoys	Buoys to monitor <i>in situ</i> condition within the windfarm, for example wave and metocean conditions.
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 overhead line realignment works area	The proposed area for National Grid overhead line realignment works.
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.
National Grid substation location	The proposed location of the National Grid substation.
Natura 2000 site	A site forming part of the network of sites made up of Special Areas of Conservation and Special Protection Areas designated respectively under the Habitats Directive and Birds Directive.
Offshore cable corridor	This is the area which will contain the offshore export cables between offshore electrical platforms and landfall.
Offshore development area	The East Anglia TWO / East Anglia ONE North windfarm site and offshore cable corridor (up to Mean High Water Springs).
Offshore electrical infrastructure	The transmission assets required to export generated electricity to shore. This includes inter-array cables from the wind turbines to the offshore electrical platforms, offshore electrical platforms, platform link cables and export cables from the offshore electrical platforms to the landfall.



Offshore electrical platform	A fixed structure located within the windfarm area, containing electrical equipment to aggregate the power from the wind turbines and convert it into a more suitable form for export to shore.
Offshore export cables	The cables which would bring electricity from the offshore electrical platforms to the landfall. These cables will include fibre optic cables.
Offshore infrastructure	All of the offshore infrastructure including wind turbines, platforms, and cables.
Offshore platform	A collective term for the construction, operation and maintenance platform and the offshore electrical platforms.
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 preparation works	Activities to be undertaken prior to formal commencement of onshore construction such as pre-planting of landscaping works, archaeological investigations, environmental and engineering surveys, diversion and laying of services, and highway alterations.
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.
Platform link cable	Electrical cable which links one or more offshore platforms. These cables will include fibre optic cables.
Safety zones	A marine area declared for the purposes of safety around a renewable energy installation or works / construction area under the Energy Act 2004.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations as a result of the flow of water.
Transition bay	Underground structures at the landfall that house the joints between the offshore export cables and the onshore cables.
Transmission DML	The deemed marine licence in respect of the transmission assets set out within Schedule 14 of the draft DCO.



1 Introduction

1. The Examining Authority (ExA) issued First Written Questions on 12th October 2020 (PD-018) in relation to East Anglia ONE North Limited and East Anglia TWO Limiteds (the Applicants) Development Consent Order (DCO) applications (the Applications) for the East Anglia ONE North project and East Anglia TWO project (the Projects). This document, submitted to the Projects' Examinations at Deadline 2, comprises the Applicants' comments on the responses of other Interested Parties to the ExA's First Written Questions.
2. The Applicants' comments are detailed in numerical order in separate volumes based on the topics set out in the Written Questions. The Applicants have not included the questions where a response has not been submitted by an Interested Party at Deadline 2.
3. 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 23rd 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.
4. Where an individual question relates to one project only it is clearly marked in column 3 of the tables in each volume. A yellow icon with a 1 indicates the question is applicable to the East Anglia ONE North project, a blue icon with a 2 indicates it is applicable to the East Anglia TWO project, and both a yellow and a blue icon with a 1 and 2 indicate the question is applicable to both Projects.



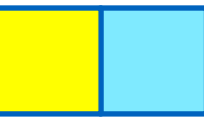
2 Applicants' Comments on Responses to ExA WQ1

2.1 Overarching, general and cross-topic questions

ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
1.0 Overarching, general and cross-topic questions				
1.0.1	SASES	<p>1 2 Good Design</p> <p>Section 4.5 of the Overarching National Policy Statement (NPS) for Energy (EN-1) emphasises the importance placed on ensuring good design in the development of infrastructure projects. This matter is cross-cutting in relation to multiple topics identified within the Initial Assessment of Principal Issues.</p> <p>Whilst the NPS is the primary source of policy under which the applications will be considered, policy within the National Planning Policy Framework (NPPF) advocates for good design as do the 'Design Principles for National Infrastructure', developed by the National Infrastructure Commission.</p> <p>Could the Applicant outline their approach to good design in respect of the following key elements, focusing on how each element reflects the principles of development responding to setting/place and people:</p> <ul style="list-style-type: none"> a) offshore wind turbine generators and associated platforms; b) onshore substations and grid connections; c) the onshore transmission cable, including any above ground ducting/chambers. 	SASES will respond to this question at Deadline 2.	No further comments
1.0.3	East Suffolk Council (ESC), Suffolk County Council (SCC)	<p>1 2 Design Mitigation: Adverse effects</p> <p>Are the measures set out in section 6.7 of the Environmental Statements (ES) (Onshore Schedule of Mitigation) sufficient to mitigate any adverse effects from the proposed substations and National Grid substation and enable the projects to satisfy the requirements of EN-1, the NPPF and local policies for visual amenity, landscape,</p>	<p>ESC & SCC Joint Lead</p> <p>Discussions with the Applicants regarding further appropriate mitigation/compensation measures are currently taking place.</p> <ul style="list-style-type: none"> a) Adequacy of Mitigation <p>ESC Landscape and Visual Amenity - Section 6.7 identifies that external lighting will be controlled through Requirement 22 and the Code of Construction Practice</p>	<p>a) The Applicants note that discussions on early planting, growth rates and the approach to landscape management with the Councils are ongoing through the Statement of Common Ground (SoCG) process. A draft SoCG with the Councils has been submitted to the Examinations at Deadline 1 (REP1-072).</p>



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<p>public rights of way and heritage matters?</p> <p>a) Provide reasons for your answer. b) If not, what further measures are required?</p>	<p>(CoCP) and Requirement 25 which controls operational lighting. The Councils accept that external lighting is suitably controlled by these requirements.</p> <p>Section 6.7 also commits to the provision of effective, appropriate and suitable landscape screening and planting secured, implemented and managed through Requirement 14. The Councils welcome the commitment to this planting detailed in the Outline Landscape and Ecological Management Strategy (OLEMS) and Outline Landscape Mitigation Plan (OLMP) and secured by Requirement 14, however the growth rates proposed and the contention that the planting will be approaching maturity and provide effective mitigation after 15 years is not agreed. The Landscape and Visual Impact Assessments (LVIA) identify significant residual impacts on landscape character and visual amenity.</p> <p>ESC Built Heritage - The operational mitigation identified in section 6.7 in relation to built heritage is the mitigation planting detailed in the OLEMS and OLMP. The Councils consider that the proposed mitigation planting will not mitigate the harm identified by locating the substations in the setting of High House Farm, Little Moor Farm, Woodside Farm and the Church of St Mary. The harm is caused by the destruction of the open, agricultural landscape within which these buildings have always been situated and through interference with/obstruction of views of the church. While some historic field boundaries are proposed to be reinstated to the south of the site the large areas of woodland have no historic precedent and merely have the effect of further severing the relationship between these historic assets and their open agricultural setting. Some changes have been made to the landscape mitigation plan to reduce further impact on the setting of the listed buildings which are welcomed, however this has reduced the impact from the mitigation itself rather than the impacts of the substations.</p> <p>Historic Landscape Character at the Substation Site - The Applicants have not fully understood the character and significance of some of the historic features and landscape elements of the Friston site. For further information please see the Local Impact Report (LIR) and Appendix 1 of the LIR. The projects would result in the loss of extant historic landscape features of local and regional importance including the historic parish/Hundred boundary (see Councils response to Question 1.8.13). The Councils understand the Applicants will be providing a clarification note in relation to this matter. The mitigation provided within the Development Consent Orders (DCO) is not sufficient in relation to the impact on the historic landscape features.</p> <p>SCC Archaeology - For below ground archaeology, the mitigation proposed with the exception of the Hundred boundary is considered reasonable and this has been noted in the LIR. The Councils are engaging with the Applicants regarding appropriate compensation for the loss of the Hundred boundary.</p> <p>SCC Public Rights of Way (PRoW) - There are no specific measures set out in section 6.7 relating to PRoWs. This is an unsatisfactory omission which the Councils believe is the result of the flawed approach taken by the Applicants to assessing the impact of the development on the rights of way network.</p> <p>The Environmental Statements (ES) do not consider the impact on the amenity value and the quality of the experience of the public using the rights of way in the vicinity of the substation site. ES Chapter 30 gives a list of PRoWs but no</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 Outline Landscape and Ecological Management Strategy (OLEMS) (APP-584) and Outline Landscape Mitigation Plan (Figure 29.11a) (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 Archaeology and Cultural Heritage Clarification Note 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 have submitted a Public Rights of Way Clarification Note to the Examinations at Deadline 1 (REP1-049). Table 2.1 of this clarification note summarises the potential impacts to PRoW identified and assessed within the Environmental Statement submitted with the Applications and sets out the associated mitigation measures proposed.</p> <p>The Applicants note that the suite of visualisations used for the Landscape and Visual Impact Assessment (LVIA) were agreed with the relevant Expert Topic Group (ETG) of which the Councils were a part of.</p> <p>For the purposes of the Environmental Impact Assessment (EIA), the Applicants dissociate the assessment of impacts upon recreation and the assessment of landscape and visual effects, noting that these are two separate matters.</p>



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			<p>description of these assets. The impact methodology considers each PRow individually using the same criteria as for holiday accommodation or a tourist attraction business. As a result, those PRow in the vicinity of the substations are classed as low sensitivity which underestimates the permanent loss of amenity for the public, particularly the local people who rely on the access network to the north of the village for recreation and quiet enjoyment.</p> <p>The LVIA's have not considered the visual impact of the substation from the proposed alternative PRow that will replace the existing footpath from the village to Little Moor Farm. No illustrative viewpoints have been provided for the proposed route as shown on the DCO's Permanent Stopping Up of PRow Plan. In consequence, there has been no assessment of the impact of construction and the residual impacts on users of this proposed footpath, it is therefore not clear how the Applicants have therefore concluded in ES Chapter 30 that there will be a negligible residual impact over the long term.</p> <p>ES Chapter 30 (30.6.1.4.2.1. para 232) acknowledges that the permanent diversion 'could' result in a significant impact whilst at the same time describing the residual impact on recreation disturbance as negligible significance (Table 30.98). This contradicts the conclusions of the LVIA's which recognises that there will be a significant visual impact for users of the existing PRow network during construction and remaining significant 15 years post construction (29.6.1.3.2).</p> <p>In addition to concerns already expressed regarding the timeliness and effectiveness of the mitigation planting, leads to the conclusion that the impact on PRow's has not been adequately mitigated. In addition, there is a lack of information as to the timing and duration of temporary and permanent closures of the PRow's around the substations site, particularly the provision of the permanent alternative route. It is difficult to reach a conclusion as to the sufficiency of mitigation measures when it is not known how long PRow's will be affected – 2yrs/4yrs/6yrs or more.</p> <p>This is particularly relevant for the permanent closure and the timescale and location for the permanent alternative route. An assessment that considered both the physical resource and the amenity and quality of the user experience on the existing PRow's and the proposed PRow's should have been undertaken as a separate theme in the ESs.</p> <p>b) Further Mitigation/Compensation Required</p> <p>Design</p> <p>Project Substations - At present we are not satisfied that the Applicants have taken all reasonable steps to reduce the footprint of the infrastructure at the substation site. The Councils would like the Applicants to fully explore any opportunities for the consolidation of infrastructure, particularly considering the Department of Business, Energy and Industrial Strategy Offshore Transmission Network Review (BEIS OTNR).</p> <p>In addition to the request to consider infrastructure sharing and consolidation, the Councils also consider that the Applicants should explore all opportunities to reduce the size and scale of the onshore substations including commitment to the use of a Gas Insulated Substation (GIS) for the National Grid infrastructure. This</p>	<p>Whilst a significant long-term visual effect has been assessed within Chapter 29 LVIA (APP-077), the Applicants do not consider this influences the potential impact upon the recreation afforded by the Public Right of Way (ProW) as a result of its diversion.</p> <p>The Applicants are unable to provide details on the precise duration of closure of each PRow listed within Schedule 13 of the draft Development Consent Order (DCO) (APP-023) until such time that the detailed design and construction programme has been developed post-consent, but note that temporary closures and diversions will last a number of weeks depending on the length of PRow being temporarily closed(see section 2.3, Outline PRow Strategy (APP-581)). The final details and measures to mitigation potential impacts upon PRow will be set out within the final PRow Strategy prepared post-consent pursuant to Requirement 32 of the draft DCO (APP-023). As per the wording of Requirement 32, no stage of the authorised development can commence until the final PRow Strategy, which must accord with the Outline PRow Strategy submitted with the Applications (APP-581), has been submitted to and approved by the relevant planning authority. Given that no works of the Projects can commence until the PRow Strategy has been authorised by the relevant planning authority, the Applicants consider this provides the appropriate control and assurance to the Councils.</p> <p>b) It should be noted, as outlined in the Project Update Note 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</p>



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			<p>should be undertaken pre-consent but also post-consent. There is currently insufficient commitment in the Outline Onshore Substation Design Principles Statement from the Applicants to endeavour to take all reasonable measures to reduce the size and scale of the infrastructure through their design refinement work.</p> <p>National Grid Substation - As detailed in response to Question 1.0.18 the Councils are aware that connections offers to three other projects have been provided by NG-ESO. It is understood that if the National Grid substation proposed under the EA1N and EA2 DCOs is consented at Friston, these future projects will connect at this location also. The Applicants have confirmed during discussions that the National Grid substation has designed to accommodate the connection of EA1N an EA2 but not further projects and therefore would need to be extended. The current design of the National Grid substation does not respond to this planned need. The Planning Inspectorate's Guidance on Associated Development permits the provision of development that provides capacity that is likely to be required for another project. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/192681/Planning_Act_2008_-_Guidance_on_associated_development_applications_for_major_infrastructure_projects.pdf</p> <p>The National Grid substation is a strategic connection site, and the design approach should reflect this position in order for the impacts of the current and future schemes to be minimised. The Councils are aware that the use of alternative technology (Gas Insulation Substation (GIS) rather than Air Insulated Substation (AIS)) within the National Grid substation would also significantly reduce the land take required. It is likely that to accommodate the future energy project connections the use of gas insulated technology would be necessary.</p> <p>The Councils have summarised in Section 14 of the LIR (paragraph 14.13) the benefits that a reduction in the footprint of the infrastructure could provide. The Councils also want to ensure that there is sufficient commitment post-consent from the Applicants to take reasonable measures to reduce the size and scale of the infrastructure during the design refinement process. The Councils have therefore requested that an outline design principles statement is also provided for the National Grid infrastructure where commitments can be secured.</p> <p>Reductions in the overall size of the EA1N, EA2 and National Grid substations infrastructure would help to minimise the impacts on landscape and visual amenity, heritage, historic landscape character and PRowS. In addition to design mitigation, the adequacy of specific mitigation set out in relation to the topic matters has been highlighted below alongside what other measures are considered necessary.</p> <p>Landscape and Visual Amenity - The Councils are continuing to engage with the Applicants on the growth rates and deliverability of the mitigation in a timely manner. We have sought a commitment to the use of adaptive maintenance and aftercare for the planting. This would allow the aftercare period in relation to the substations mitigation planting to be suspended if specified parameters were not achieved. Targeting management measures could then be agreed to address the</p>	<p>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>The Applicants note that no stage of Work No. 30 (onshore substation) – a crucial element of the Projects – may be commenced until final details regarding the design (including scale and character) of the onshore substations have been submitted to and approved by the relevant planning authority pursuant to Requirement 12 of the draft DCO (APP-023). Such details must accord with the Outline Onshore Substation Design Principles Statement (APP-585).</p> <p>The Applicants submitted an Outline National Grid Substation Design Principles Statement to the Examinations at Deadline 1 (document reference ExA.AS-6.D1.V1). An updated draft DCO (APP-023) will be submitted at Deadline 3. 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 Outline National Grid Substation Design Principles Statement (REP1-046). The final National Grid Substation Design Principles Statement will require to be submitted to and approved by the relevant planning authority.</p> <p>The Applicants note that the DCO would authorise the Projects within specified maximum parameters, although it is noted that the Outline Onshore Substation Design Principles Statement (APP-585) and Outline National Grid Substation Design Principles Statement (submitted at Deadline 1 (REP1-046)) provide for various design principles, including a statement that the substations should be sensitively located, with visual impacts minimised as far as practicable by the use of appropriate design, building materials, shape, layout, coloration and finishes.</p> <p>The Applicants have responded separately to the Councils Joint Local Impact Report (LIR) within Applicants' Comments on the LIR (document reference ExA.LIR.D2.V1).</p>



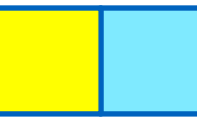
ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2	
			<p>issues identified and only upon agreement with the local authority, would the aftercare/maintenance period re-commence.</p> <p>In additional to this, as stated above, the LVIAs identify significant residual impacts on landscape character and visual amenity. The Councils have requested that further offsite planting should be provided in order to help offset the impacts identified. The Councils consider that offsite planting should be provided in strategic locations to reinforce field boundaries and PRowWs in the locality.</p> <p>Built Heritage - 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 therefore result in residual harm to the setting of a number of listed buildings. Given that it is not possible to directly mitigate the harm caused to the significance of these assets, the Councils have requested that the Applicants provide appropriate compensation. The Councils have discussed with the Applicants the provision of a heritage fund 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>Historic Landscape Character - The Councils have been engaging with the Applicants to seek appropriate compensation in relation to the harm to the historic landscape through the provision of a fund. The fund would be used to commission a monograph and booklet for the local community detailing the historic features and evolution of the area, in addition to funding community archaeological excavation and outreach.</p> <p>PRow - Further mitigation/compensation is considered necessary including the provision of new access and improvements to existing access opportunities in the vicinity of Friston village.</p>	<p>The Applicants are in discussions with the Councils regarding potentially providing contributions to East Suffolk Council (ESC) to support additional enhancement measures in relation to landscape, access and cultural heritage matters.</p>	
1.0.3	Natural England	1 2	<p>Design Mitigation: Adverse effects Are the measures set out in section 6.7 of the Environmental Statements (ES) (Onshore Schedule of Mitigation) sufficient to mitigate any adverse effects from the proposed substations and National Grid substation and enable the projects to satisfy the requirements of EN-1, the NPPF and local policies for visual amenity, landscape, public rights of way and heritage matters?</p> <p>a) Provide reasons for your answer. b) If not, what further measures are required?</p>	<p>Because the substations are out with the Suffolk Coast and Heath AONB and the setting thereof; NE defers to the local planning authority on this matter.</p>	<p>No further comment</p>
1.0.3	Historic England	1 2	<p>Design Mitigation: Adverse effects Are the measures set out in section 6.7 of the Environmental Statements (ES) (Onshore Schedule of Mitigation) sufficient to mitigate any adverse effects from the proposed substations and National Grid</p>	<p>We have considered this question and have provided comment in our full written statement. We have raised concerns</p>	<p>The Applicants refer to their Comments on Historic England's Written Representation provided in Applicants' Comments on Written Representations Volume 2 Technical Stakeholders (document reference</p>



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		<p>substation and enable the projects to satisfy the requirements of EN-1, the NPPF and local policies for visual amenity, landscape, public rights of way and heritage matters?</p> <p>a) Provide reasons for your answer. b) If not, what further measures are required?</p>	<p>1) The planning considered to have a harmful impact upon the significance of the grade II* listed church, though changes to the landscape and in impeding views etc</p> <p>2) It is not possible to fully mitigate the impact of the development in all views</p> <p>3) That the LPA have raised concerns about the growth rates for trees which would mean the impact of the screening in reducing the harm would potentially be less effective.</p>	<p>ExA.WR_2.D2.V1) submitted at Deadline 2 and their responses to Q1.8.9 and 1.8.10 in Volume 10 Applicants' Response to Written Questions Historic Environment (REP1-113) submitted at Deadline 1 regarding mitigation.</p> <p>As set out in section 3.5.4 of the OLEMS (APP-584), assumed growth rates are based on relevant guidance from the Institute of Environmental Management (IEMA), research of relevant published literature and plant nurseries, and are comparable to precedents established by other Nationally Significant Infrastructure Projects (NSIPs).</p> <p>The Applicants held ETG meetings in which growth rates were discussed with the local planning authority (Table 3.1 of the OLEMS (APP-584)). Section 3.5.4 of the OLEMS (APP-584) provides information on the assumed growth rates of trees utilised for landscaping.</p> <p>The Applicants highlight that the growth rates of landscape planting adopted for the assessment presented in the ES were lowered following the Preliminary Environmental Impact Report in response to the Councils Section 42 consultation response, as referred to in Table 29.1, Appendix 29.1 (APP-565).</p>
1.0.3	SASES	<p>Design Mitigation: Adverse effects Are the measures set out in section 6.7 of the Environmental Statements (ES) (Onshore Schedule of Mitigation) sufficient to mitigate any adverse effects from the proposed substations and National Grid substation and enable the projects to satisfy the requirements of EN-1, the NPPF and local policies for visual amenity, landscape, public rights of way and heritage matters?</p> <p>a) Provide reasons for your answer. b) If not, what further measures are required?</p>	<p>SASES</p> <p>With regard to ES section 6.7 (Onshore Schedule of Mitigation) and its Chapters as listed below, our responses are as follows: Chapter 19 - See SASES WRs Transport and Traffic, Construction – Substations Site, Construction - Onshore Cable Corridor Chapter 20 - See SASES WR Flood Risk Chapter 21 – See SASES WR Land Use Chapter 22 & 23 - See SASES WR Ecology Chapter 24 - See SASES WR Cultural Heritage Chapter 25 - See SASES WR Noise Chapter 26 - See SASES WR Traffic & Transport Chapter 27 - See SASES WR Human Health Chapter 29 - See SASES WR Landscape and Visual Impact Chapter 30 - See SASES WR Socio- Economic Issues</p>	<p>Please see the Applicants' detailed response to this written question (REP1-105). The Applicants note the submissions at Deadline 1 from SASES and have provided a summary of their response in the Applicant's Comments on Written representations Volume 2 (document reference ExA.WR_2.D2.V1).</p>
1.0.3	Save our Sandlings	<p>Design Mitigation: Adverse effects Are the measures set out in section 6.7 of the Environmental Statements (ES) (Onshore Schedule of Mitigation) sufficient to mitigate any adverse effects from the proposed substations and National Grid substation and enable the projects to satisfy the requirements of EN-1, the NPPF and local policies for visual amenity, landscape,</p>	<p>We contend that these applications does not pay sufficient regard to impact mitigation in respect of the visual amenity, landscape, public rights of way and heritage. The Suffolk Sandlings is a special area of lowland heath within the Suffolk Coast & Heaths Area of Outstanding Natural Beauty, (SC&H AONB)1 covering 403 sq. Km and is a relatively narrow strip of coastal land from Ipswich to Lowestoft. The AONB can almost be considered in two halves as the land narrows considerably at Leiston cum Sizewell as it threads its way past the now heavily industrialised area at Sizewell. Additional large constructions will cause</p>	<p>The Applications provide details of mitigation measures in respect of visual amenity and landscape, public rights of way and heritage. These are presented within:</p> <ul style="list-style-type: none"> Chapter 29 (APP-077), Chapter 30 (APP-078) and Chapter 24 (APP-072) of the Environmental Statement respectively



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		<p>public rights of way and heritage matters?</p> <p>a) Provide reasons for your answer. b) If not, what further measures are required?</p>	<p>sever impacts not only to the wildlife and ecology of the area, but also to the visual appeal of the area as a whole. The Suffolk AONB is a special place and is widely known as an area of tranquillity, with many footpaths, bridleways and PROWS used by visitors and the local community for recreation and exercise.</p> <p>Since the first Covid-19 national lockdown, and subsequent easing of restrictions, a noticeable increase in numbers can be seen using these byways each day. The peace and tranquillity that make this area so special will be lost. On the subject of the substation site, we fail to understand how any mitigation will be sufficient to offset the huge visual impact a complex of this size will have on the small medieval village of Friston, completely dwarfing local properties and the church of St. Mary the Virgin. We agree and endorse the detailed representations made by SASES and many others in rejecting these proposals and questioning how a project of this size was ever conceived as appropriate for this location. Public rights of way established over centuries will be diverted or removed from public access. No amount of tree planting can ever disguise the extent of the complex</p>	<ul style="list-style-type: none"> • Certified documents accompanying the Applications (the OLEMS (APP-584), Outline Code of Construction Practice (APP-578), Outline PRow Strategy (APP-581) and Outline Written Scheme of Investigation Onshore (WSI) (APP-582)); and • Secured through the requirements of the draft DCO (APP-023). <p>Since submission of the Applications, the Applicants have been progressing discussions with the Councils and other statutory consultees on mitigation proposals in order to provide more detail and certainty over these proposals.</p> <p>As outlined in the Project Update Note 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. This allows for further refinement of mitigation plans. Further details including a selection of revised photomontages and an updated Outline Landscape and Ecological Management Strategy (OLEMS) and Outline Landscape Mitigation Plan (OLMP) will be submitted at Deadline 3 reflecting these changes.</p>
1.0.3	SEAS	<p>Design Mitigation: Adverse effects Are the measures set out in section 6.7 of the Environmental Statements (ES) (Onshore Schedule of Mitigation) sufficient to mitigate any adverse effects from the proposed substations and National Grid substation and enable the projects to satisfy the requirements of EN-1, the NPPF and local policies for visual amenity, landscape, public rights of way and heritage matters?</p> <p>a) Provide reasons for your answer. b) If not, what further measures are required?</p>	<p>There are NO mitigation proposals offered by ScottishPower Renewables or National Grid which can compensate adequately for the scale of destruction to be wrought on Friston and the cable trench route from Thorpeness Cliffs to Friston.</p> <p>The severe adverse impacts of these design proposals outweigh any benefits of green energy generation. These plans despoil a medieval village, blot out dreamy views across the fields towards Friston Church from Fristonmoor, erase peaceful, pilgrims pathways, and replace unadorned Nature with blocks of steel, carpets of tarmac and concrete, and years of HGVs and drills. The rich heritage found within a medieval village cannot be valued. It is priceless. It's not just the stock of Grade Two listed houses (described as "minor impact" by SPR for the majority of houses even though they are situated on the intrusive frontline and most will lose their views that have been there since Chaucer), nor the listed Church of St Mary the Virgin. It's the essential rural character of Friston, a small community where dog walkers meet and have a word as they cross the fields and where volunteers clean the Church and fill it with flowers and choral song, where the old and the young find a moment of peace looking up at the dark skies and see the stars. There is a spiritual, and immaterial beauty that cannot be boxed or valued by developers or anyone else.</p> <p>We endorse SASES detailed Issue Specific Representations relating to landscape, heritage, noise, light, dust, flooding and community. Specialist reports</p>	<p>The Applications provide details of mitigation measures in respect of the impacts across all receptors. These are presented within:</p> <ul style="list-style-type: none"> • Chapter 29 (APP-077), Chapter 30 (APP-078) and Chapter 24 (APP-072) of the ES respectively • Certified documents accompanying the Applications (the Outline Landscape and Ecological Management Strategy (OLEMS) (APP-584), Outline Code of Construction Practice (APP-578), Outline PRow Strategy (APP-581) and Outline Written Scheme of Investigation Onshore (WSI) (APP-582)); and • Secured through the requirements of the draft DCO (APP-023). <p>The mitigation measures presented are designed to minimise as far as possible the potential residual impacts.</p>



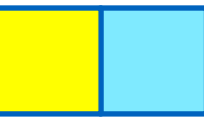
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			<p>have been prepared and we are supportive of their total and unequivocal rejection of the design plans for the substations and inter-connectors. We would in particular, note how careless and callous these site plans are with regard to proximity to a thriving village.</p> <p>We have consulted with Noise specialists and interviewed Scottish communities who live close to the substations near Inverness. They have referenced the "intolerable, never-ending low frequency humming noise". A particular Councillor's son is now suffering from epileptic fits and some people say this is due to the noise. The intensity of noise from eight substations and interconnectors is exponential, not additional. To quote: "There is a growing list of self-reported health symptoms that some people attribute to audible noise, low frequency noise and infrasound, and EMF. A study published in 2013 by Chapman, has reported over 200 symptoms for example, difficulty sleeping, fatigue, depression, irritability, cognitive disfunction, nausea, dizziness, tinnitus, ringing in ears, headaches, lack of concentration, vertigo and sleep disruption". In the countryside, people expect to be able to open a window at night and enjoy the night air and peace. Imagine waking up in the middle of the night in Friston and hearing the low humming noise, seeing the myriad lights around the building site and smelling the dust. "What hath night to do with sleep?" (John Milton). Retirees who chose a home in Friston had fled the urban dust and noise to find a tranquil haven, a bit of paradise. Friston will be renamed Paradise Lost.</p> <p>As we set out in ExQ 1.14.5, these SPR proposals denote the Trojan horse, and inexorably lead on to the foundations for a vast complex of substations and interconnectors, the largest of its kind in Europe.</p> <p>If they were being constructed on a brownfield site, we would be proud of these vaulting ambitious towers, we would celebrate their modernity and would endorse their dynamic essence. We could even get excited about their Farrow & Ball choice of Exterior Wall colours. Possibly Elephant's Breath, Dead Salmon and Cinder Rose.</p> <p>Yes, incredibly, the Design Council has been consulted by SPR architects; that is the level of discussion encouraged by SPR PR men at one of the consultation meetings.</p> <p>"Let's discuss colours". Quite simply, the choice of Friston as the preferred site is utterly absurd for these industrial, faceless behemoths.</p> <p>The SEAS Written Representation for Biodiversity and Habitats discusses the adverse impact of severing public rights of way. The communities of Aldringham, Knodishall, Leiston, Sandlings and Friston will have to endure great hardship journeying to school, work, the doctor, shops, station or hospital. The simple things in life that we all assume as a right in this country, will be eroded. The elderly may be more isolated than ever. They may well feel abandoned. Young locals will even more feel the need to escape to an urban sanctuary.</p>	<p>Since submission of the Applications, the Applicants have been progressing discussions with the Councils' specialists and other statutory consultees on mitigation proposals in order to provide more detail and certainty over these proposals. In addition, the Applicants have made several commitments to revise the Projects' designs or construction methodologies as a direct response to comments on the Applications. Further details will be provided at Deadline 3.</p> <p>The Applicants note an operational noise limit of 34dB at the two noise sensitive receptors nearest to the onshore substation locations is secured through Requirement 26 and Requirement 27 of the draft DCO (APP-023). The final design, which includes appropriate mitigation, will be developed during the detailed design stage to ensure that this noise limit is not breached during the operation phase of the Projects.</p> <p>As outlined in the Project Update Note 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. Further information will be provided at Deadline 3.</p>
1.0.4	ESC, SCC	1 2 Design Mitigation: Adverse effects - AONB Is sufficient weight given to the statutory purpose and need for protection of the landscape, character and special qualities of the Suffolk Coast and Heaths AONB	ESC Lead Authority Onshore Infrastructure	The Applicants have submitted a note Effects with Regard to the Statutory Purposes of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and Accordance with NPS Policy to the



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		<p>both within and from outside its boundary, in accordance with paragraphs 5.9.9 and 5.9.12 of EN-1?</p> <p>a) Provide reasons for your answer. b) If not, what further measures are required?</p>	<p>No - The Councils consider that further modifications to the design and build process should be explored. The Councils would like the Applicants to commit to the simultaneous construction of the projects in order to reduce impacts on the Area of Outstanding Natural Beauty (AONB). If this is not considered possible and the Examining Authority accept the Applicants' reasoning for this, the Councils consider the first project should install the ducting for the cabling of the second project. This would reduce the impact of construction on the AONB and meet the statutory duty (s85 of the Countryside and Rights of Way Act 2000 (CRoW Act)) to have regard to the purposes of the AONB 'to conserve and enhance the natural beauty of the area'.</p> <p>Offshore Turbines</p> <p>No - The Councils consider that the EA2 array will undermine the purposes of the AONB designation as defined by s82(1) of the CRoW, that is, "conserving and enhancing the natural beauty of the area". The Applicant's Seascape, Landscape and Visual Impact Assessment (SLVIA) in relation to EA2 has identified significant effects on the special qualities of the AONB as a result of the offshore turbines, notwithstanding the Applicant's design modifications comprising the modestly extended separation of the EA2 and EA1N arrays and reduction in height of the wind turbines. No update to the SLVIA has been provided to understand the implications of the Applicant's commitment to a reduction of the turbine heights of EA2 to 282 metres, however the Councils are of the view, taking this reduction into consideration, that the project would still result in significant effects on the special qualities of the AONB. The Councils consider that further design modifications should be explored, for example a further reduction in height, to reduce this impact and meet the statutory duty 'to conserve and enhance the natural beauty of the area'. At present it is not considered that sufficient weight has been attributed by the Applicant to the statutory purpose of the AONB.</p> <p>In terms of the precise height and layout that would achieve an acceptable scheme, we defer to Natural England on this matter and will be guided by them.</p> <p>The Councils consider that appropriate compensation should also be provided in relation to any residual effects on the AONB as a result of the EA2 project.</p>	<p>Examinations at Deadline 2 (document reference ExA.AS-5.D2.V1), to address the concerns raised by the Councils and other stakeholders in relation to the potential impact of the Projects upon the statutory purpose of the AONB.</p> <p>As outlined in the Project Update Note 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>
1.0.4	Natural England	<p>1 2 Design Mitigation: Adverse effects - AONB Is sufficient weight given to the statutory purpose and need for protection of the landscape, character and special qualities of the Suffolk Coast and Heaths AONB both within and from outside its boundary, in accordance with paragraphs 5.9.9 and 5.9.12 of EN-1?</p> <p>a) Provide reasons for your answer. b) If not, what further measures are required?</p>	<p>Natural England has raised concerns on this matter. Please see our relevant/written representation [RR-059] and Deadline 1 response Appendix D1b (LVIA).</p>	<p>No further comment</p>
1.0.4	Historic England	<p>1 2 Design Mitigation: Adverse effects - AONB Is sufficient weight given to the statutory purpose and need for protection of the</p>	<p>No comment</p>	<p>The Applicants refer to its note Effects with Regard to the Statutory Purposes of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty</p>



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		<p>landscape, character and special qualities of the Suffolk Coast and Heaths AONB both within and from outside its boundary, in accordance with paragraphs 5.9.9 and 5.9.12 of EN-1?</p> <p>a) Provide reasons for your answer. b) If not, what further measures are required?</p>		and Accordance with NPS Policy (ExA.AS-5.D2.V1) submitted at Deadline 2.
1.0.4	SASES	<p>Design Mitigation: Adverse effects - AONB Is sufficient weight given to the statutory purpose and need for protection of the landscape, character and special qualities of the Suffolk Coast and Heaths AONB both within and from outside its boundary, in accordance with paragraphs 5.9.9 and 5.9.12 of EN-1?</p> <p>a) Provide reasons for your answer. b) If not, what further measures are required?</p>	SASES supports the comments of other community groups in relation to this topic.	No further comments
1.0.4	Save our Sandlings	<p>Design Mitigation: Adverse effects - AONB Is sufficient weight given to the statutory purpose and need for protection of the landscape, character and special qualities of the Suffolk Coast and Heaths AONB both within and from outside its boundary, in accordance with paragraphs 5.9.9 and 5.9.12 of EN-1?</p> <p>a) Provide reasons for your answer. b) If not, what further measures are required?</p>	<p>We are concerned of the impact these applications will have on the wildlife and ecology of the area from cable landfall site to the substations end point. The cable trenching operation will bisect natural foraging and transit pathways used by many species. The most notable, in size is the red deer herd, our biggest land mammal. The herd ranges far and wide across this area and a ground inspection will reveal, their tracks and activity can be seen all over the Thorpeness – Leiston – Sizewell area. The herd is also 'reported' to be a purer strain than many Highland herds, no inter-breeding with other species, i.e. roe deer, has taken place. But there are numerous other species just as important present, many of whom are inter-dependent on each other. Apart from fox and rabbit, there are reports of badger, otter, stoat, weasel, field mice, adder as well as multiple bird species. Some are resident, some transit through, especially a number of bird species. The Suffolk coast is the first and last port of call for many migrating bird species, similar to a motorway service station, as they stop for rest and refuel before continuing their journey. Crops and grassland are vitally important for their survival. The fields in the area are a mixture of land under crop management to open heath and provide a source of food and natural cover. Removing this land availability, even temporarily during construction will deprive many species of habitat, food and security from predation.</p> <p>Visuals produced in support of the application attempt to show how trees will screen the village from the construction, but this area can also be seen from the A1094 and B1069; the screen of trees will be inadequate to effectively disguise this blot on the landscape. These plans show a careless and callous disregard to the wishes and feeling of communities of East Suffolk, and Friston in particular, and has led to many feeling helpless and distressed at these proceedings. We are mindful of the role of National Grid ESO in all of this. Had a discussion with National and local planning authorities taken place, including local community consultation at the early stages, outlining the need for additional connection</p>	<p>The Applicants note that all matters relating to existing environment and assessment methodology (including site specific surveys) are agreed in the SoCGs with both Natural England (REP1-057) and the Councils (REP1-072). Outstanding matters are being discussed with Natural England and the Councils and concern some of the conclusions and proposed mitigation (please see the SoCGs for details).</p> <p>The Applicants have held SoCG meetings regarding Onshore Ornithology with the Councils, Natural England, and the Royal Society for the Protection of Birds (RSPB), draft SoCGs have been submitted at Deadline 1 (REP1-072, REP1-057 and REP1-395). It should be noted that Natural England and the Applicants are in agreement on statements the Existing Environment, Assessment Methodology and Assessment Conclusions. Statements on Mitigation and the DCO remain outstanding and under discussion. For the Councils some assessment conclusions and mitigation matters are outstanding.</p> <p>The Applicants have undertaken an assessment of potential impacts of the Projects on sensitive ecological receptors, which is presented within Chapter 22 of the ES (APP-070). An assessment of potential impacts of the Projects on sensitive ornithological receptors is presented within Chapter 23 (APP-071). Appropriate mitigation measures for</p>



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			<p>capacity to the Sizewell to Bramford 400 Kv line, we are certain plans would have been rejected as completely unsuitable for consideration in an area of AONB. The initial consultations presented 7 sites for the substations, none of which had any merit or benefit to the area. Consultees were asked to choose the least worst option. A brownfield site should always take a higher priority than open greenfield and agricultural land, especially in the case of AONB which is supposed to have the highest protection in the land. Should these applications proceed, it sets an extremely dangerous precedent for any future development applications on, or adjacent AONBs. There are better solutions available; they are in use now by other energy providers in other countries. Suffolk and the UK deserve better</p>	<p>each receptor, proportionate to the impacts assessed, are presented within the respective topic ES chapter. Ecological and ornithological mitigation measures are also set out within the OLEMS (APP-584), and a final EMP must be prepared in accordance with the OLEMS. This must be submitted to and approved by the relevant planning authority prior to the commencement of the relevant stage of the onshore works, pursuant to Requirement 21 of the draft DCO (APP-023).</p> <p>It should be noted, as outlined in the Project Update Note 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>Please see the Applicants' detailed response to this written question (REP-105).</p> <p>For site selection, the Applicants engaged in discussions regarding the onshore substation and National Grid substation locations via meetings, site visits and workshops with a Site Selection ETG from July 2017. These meetings included the monthly project management Local Planning Authority meetings; and at the Suffolk Energy Projects Working Together meetings. The ETG comprised Suffolk County Council, Suffolk Coastal and Waveney District Council (now East Suffolk Council), Natural England, Historic England, the Suffolk Coast and Heaths AONB, the Environment Agency and National Grid Electricity Transmission. The ETG met on the dates as outlined in Table 4.2 of Chapter 4 Site Selection and Assessment of Alternatives (APP-.052). The ETG consultation ensured that the</p>



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					<p>site selection process accounted for a wide range of expert, independent advice and was robust. The process was not developed and undertaken solely by the Applicants. It was iterative, and topics, scoring and weighting were agreed through the ETG (see Appendix 4.2 - Red Amber Green (RAG) Assessment for Onshore Substations Site Selection in the Sizewell Area (APP-443)).</p> <p>It should be noted that Natural England provided the following comment on the site selection process (see Appendix 4.1 - Site Selection and Assessment of Alternatives Consultation Responses (APP-442)).</p> <p><i>"As Natural England has been involved in the site selection process, we currently have no further comment on this chapter currently. However, we believe that SPR has adopted a good systematic approach that has allowed for a thorough consideration of alternative options."</i></p>
1.0.4	SEAS	1	<p>Design Mitigation: Adverse effects - AONB</p> <p>Is sufficient weight given to the statutory purpose and need for protection of the landscape, character and special qualities of the Suffolk Coast and Heaths AONB both within and from outside its boundary, in accordance with paragraphs 5.9.9 and 5.9.12 of EN-1?</p> <p>a) Provide reasons for your answer. b) If not, what further measures are required?</p>	<p>We endorse SASES and SOS Representations with regard to the threats to the special qualities of the Suffolk Coast and Heaths AONB both within and from outside its boundary.</p> <p>According to paragraph 5.9.9 of EN-1 this AONB should "have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty". Yet this proposal directly contravenes this National Policy Statement as the cable corridors cut right through the Suffolk Heaths and Coast AONB.</p> <p>For this examination, we have to give evidence. It is hard to prove what will happen. The SPR forecasts seem remarkably optimistic. A few new hedgerows and trees and according to their specialists, it's all sorted. Our SEAS submission with regard to Biodiversity and Habitats paints a very different outcome. Are we too pessimistic or is SPR too optimistic?</p> <p>We are focused on the cumulative impact of 12 to 15 years of construction of this vast complex. SPR is looking at a construction programme lasting a few years. We are really comparing apples with pears. Most of the destruction along the cable route will happen during SPR's construction work. Elsewhere around Friston, the destruction will continue as more land is grabbed and more industrialisation takes place.</p> <p>An ancient woodland, a pure red deer, a two hundred-year-old hedgerow. No, these rarities will never come back. This is permanent destruction and is needless when there is a better alternative solution. Wind energy should be aligned with ecological protection and conservation. How on earth have we allowed wind energy to be set against conservation?</p> <p>The risk to Thorpeness Cliffs and the Coralline Crag is discussed in our Representation in detail. How do we have a guarantee that the drilling process will be controlled sufficiently to ensure no further crumbling of the Cliffs caused by</p>	<p>Since submission of the Applications, the Applicants have been progressing discussions with the Councils on mitigation proposals in order to provide more detail and certainty over these proposals.</p> <p>The Applicants have held SoCG meetings regarding Landscape and visual impact assessment (LVIA) with the Councils, Natural England, SPS, and Suffolk Coast and Heaths AONB Partnership and submitted draft SoCGs at deadline 1 (REP1-072) (REP1-057) (REP1-060) (REP1-075).</p> <p>As outlined in the Project Update Note 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 addition, the Applicants have submitted a Sizewell C CIA Landscape and Visual Impact Assessment Clarification Note at Deadline 2 (document reference ExA.AS-7.D2.V1). This note sets out the Applicants' clarification on potential cumulative</p>



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			<p>destabilising them? How do we know that SPR will follow through their promise not to touch the coralline Crag? SPR has not delivered on their word to meet agreed targets for electricity generated by EA1. SASES representations give evidence to this failure. Why should we trust SPR's word to safeguard these fragile and friable Cliffs and Crag?</p> <p>The low wetland heathland represents a significant proportion of this ecology on the planet, as much as 1% of the total (see Footnotes 1 and 2). It is rightly named our "rainforest". It is surely to be protected and nurtured under all circumstances. We cannot take any risks of giving away this treasured wetland. The value of these rare assets is inestimable.</p> <p>If one looks carefully at the boundary of the AONB and SPR's proposed site for onshore substations and National Grid Infrastructure then it can be seen that the AONB is only 1.3 km from the land on which an 18m high substation is being proposed. It is therefore certain that the steel towers will be visible from a number of sites within the AONB including Snape Warren, a 48-hectare biological Site of Special Scientific Interest. Not only is it within the AONB but it is part of the Sandlings Special Protection Area under the European Union Directive on the Conservation of Wild Birds.</p> <p>The proximity of this diverse and ecologically important Suffolk Coast and Heaths AONB to the Friston substations with their scale, height, design, operational impacts including noise, light and dust pollution will cause significant and demonstrable permanent harm to the Suffolk AONB and its surrounding unspoilt countryside and villages.</p> <p>I repeat, paragraph 5.9.12 of EN-1 states "AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty". Maintaining the natural beauty of this AONB will be impossible with such a poorly located industrial development on its doorstep.</p> <p>If the essential character of the neighbouring low heathland, wetland and wilderness is undermined, and if the rural character of the surrounding area is eradicated through the loss of tranquillity, nature, rich biodiversity, delicate ecology and prime agricultural land, what remains?</p> <p>In short, these energy projects pose an existential threat to the Suffolk Coast and Heaths AONB.</p> <p>b) SEAS consider that the Applicant's proposals will have a harmful impact on the character and appearance of the nationally important Suffolk Coast and Heaths Area of Outstanding Natural Beauty. Due to the proximity of the proposed substations and National Grid Infrastructure, SEAS do not consider that these detrimental impacts to the landscape character and visual amenity of the area can be satisfactorily mitigated against and that the identified harm is significant and demonstrable and the benefits of the proposals do not outweigh such harm. In light of the above the proposal is considered in landscape terms to be contrary to the Overarching National Policy for Energy EN-1 – in particular paragraphs 5.9.9 and 5.9.12. We urge the Inspectorate to reject these plans and protect our rich and rare ecology.</p>	<p>landscape and visual effects of the Projects with the proposed Sizewell C New Nuclear Power Station (SZC).</p> <p>A commitment has been made to install the export cable at the landfall, using trenchless techniques, thus minimising disturbance to the cliffs and SSSI. Monitoring of the landfall will be undertaken as set out in section 3 of the Outline Landfall Construction Method Statement (REP1-042), submitted at Deadline 1.</p> <p>The Outline Landfall Construction Method Statement provides outline information regarding the trenchless technique works design and methodology respectively. Detailed parameters such as length, depth and angles of the drilling will be subject to detailed design and will be provided in the final Landfall Construction Method Statement which is secured under Requirement 13 of the draft DCO (APP-023).An updated draft DCO will be submitted at Deadline 3, and this will amend Requirement 13 to provide that the Landfall Construction Method Statement must accord with the Outline Landfall Construction Method Statement.</p> <p>Please see the Applicants' detailed response to this written question (REP1-105).</p> <p>As shown within Figure 29.8 of the ES (APP-398) the Applicants note that parts of the AONB (including Snape Warren) are located within the study area adopted for the LVIA – a 3km buffer around the onshore development area, as was agreed with stakeholders during SLVIA ETG meetings. Representative viewpoints were agreed for the LVIA as part of the SLVIA ETG consultations and are shown in Figure 29.4 of the ES (APP-394). Fourteen photomontages and a further five illustrative viewpoints of the onshore substations, all located closer to the onshore substation locations than the AONB designation at its closest point, were submitted as part of the Applications. The Applicants consider that the assessment of potential LVIA effects associated with the Projects provides sufficient detail and is appropriate.</p> <p>It should be noted that Special Protection Areas are designated through ecological conservation based objectives rather than landscape and visual objectives. An assessment of potential ecological</p>



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				impacts upon Special Protection Areas is covered within Chapter 22 (APP-070) and Chapter 23 (APP-071) of the ES.
1.0.8	ESC, SCC	1 2 Design Principles a) In the context of EN-1 paragraph 4.5.5, explain how the design of the EA1N and EA2 projects meet the National Infrastructure Commission's Design Principles for National Infrastructure (February 2020) in respect of Climate, Places, People and Value, both offshore and onshore and in all three phases of construction, operation and decommissioning. b) Comment on the desirability of implementing the following measures to ensure that good quality sustainable design and integration of the proposed substations and National Grid substation projects into the landscape is achieved in the detailed design, construction and operation of the projects. How might they be secured? Are any further measures appropriate? i) A 'design champion' to advise on the quality of sustainable design and the spatial integration of energy infrastructure structures, buildings, compounds, security fences, landscape, heritage, woodland, new landscape features, public rights of way and visual amenity. ii) A 'design review panel' to provide informed 'critical-friend' comment on the developing sustainable design proposals; iii) An approved 'design code' or 'design approach document' (as approved in the Hinkley Point C Connector Project (EN020001)) to set out the	ESC Lead Authority In response to the particular question posed to the local authorities at (b)(v): In the opinion of the Councils these or similar measures would be welcomed and are likely to help to secure good design and ensure effective engagement of key local stakeholders in the process. The Applicants have provided an Outline Onshore Substation Design Principles Statement (APP-585) which includes design principles which will underpin the design of the onshore substations for EA1N and EA2. This is a useful document and its submission early in the process allows stakeholders to provide comments. The Councils welcome the commitment from the Applicants for the landscape and building design to be subject to design review. It is also stated that the substation building "should be sensitively placed, with visual impacts minimised as far as possible by the use of appropriate design, building materials, shape, layout, colouration and finishes" (APP-585). Although useful wording, there is considered insufficient commitment to ensure reasonable endeavours are taken to minimise the size and scale of the substations. The wording of the design principles excludes the substation infrastructure more generally and only relates to the substation building design. The Councils would welcome a commitment from the Applicants to use their best endeavours to explore opportunities through the design refinement process to reduce the scale and size of the substations overall. Additionally, it is hoped the commitment to seek gains for public amenity, which is identified in the outline design principles, would also include the consideration of providing areas of open access land. The commitment in the Outline Onshore Substation Design Principles Statement to continue engagement with Parish Councils, local residents and the relevant authorities on the design and landscape proposals is welcomed. It is however considered that this engagement must be more than a single consultation. Good design is a process which the key stakeholders, particularly the affected local community should be part of. The Councils would therefore fully support the provision of a document outlining the proposed design process including timelines and details of the consultation to be undertaken. This would provide greater transparency and articulate in outline form, the process through which the local community would be involved, and at which stages in the design process this would be. The Councils believe the design principles should also relate to the National Grid substation, or this substation should have its own design principles document. It is agreed that the inclusion of a design champion who would advocate the achievement of good design and seek to ensure that the design principles were carried through would be a beneficial addition which is currently not proposed. As stated above, it is considered that these measures would help to secure good design and effective engagement. These measures could be secured within the	The Applicants note that no stage of Work No. 30 (onshore substation) – a crucial element of the Projects – may be commenced until final details regarding the design (including scale and character) of the onshore substations have been submitted to and approved by the relevant planning authority pursuant to Requirement 12 of the draft DCO (APP-023). Such details must accord with the Outline Onshore Substation Design Principles Statement (APP-585). The Applicants submitted an Outline National Grid Substation Design Principles Statement to the Examinations at Deadline 1 (REP1-046). An updated draft DCO (APP-023) will be submitted at Deadline 3. 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 Outline National Grid Substation Design Principles Statement . The final National Grid Substation Design Principles Statement will be submitted to and approved by the relevant planning authority. The Applicants note that the DCO would authorise the Projects within specified maximum parameters, although it is noted that the Outline Onshore Substation Design Principles Statement (APP-585) and Outline National Grid Substation Design Principles Statement (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. The Applicants note that the Councils request for the provision of an area of amenity land is being discussed within the SoCG process. The Applicants note that the design details secured by Requirement 12 of the draft DCO (APP-023) must be approved by the Councils and consider this the appropriate mechanism for discharging this Requirement. It is not considered appropriate for the



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			<p>approach to delivering the detailed design specifications to achieve good quality sustainable design;</p> <p>iv) An outline, including timeline, of the proposed design process, including consultation with stakeholders and a list of proposed consultees.</p> <p>v) In the opinion of the local authorities and other statutory agencies, would the implementation of any or all of the above measures assist in determining post-consent approvals (including the discharge of requirements) in relation to achieving good design?</p>	<p>expansion/amendment of the Outline Onshore Substation Design Statement so that it included further details on the design process and engagement measures to be adopted. This document could be submitted, and agreed, before completion of the examination. A final detailed version of this document would then be submitted and agreed with relevant planning authority as part of the discharge of requirements, prior to the implementation of the agreed design review and engagement process therein. The outcomes of this agreed process would then inform the final layout and design details of the schemes and the discharge of the relevant requirements. The sequence of agreeing the final version of the outline design principles and post consent process document before other documents affecting the substation site, could be articulated in the outline document and OLEMS. The design principles and engagement process document could be secured through an amendment to Requirement 12.</p> <p>The Councils also consider that this design review process could be a mechanism to facilitate and help realise opportunities for further consolidation of the project substations post consent, particularly given the ongoing BEIS OTNR.</p>	<p>general public and parish councils to be involved within the design process.</p> <p>The Applicants will submit an updated draft DCO (APP-023) and an updated OLEMS (APP-584) at Deadline 3.</p>
1.0.8	Natural England	1 2	<p>Design Principles</p> <p>a) In the context of EN-1 paragraph 4.5.5, explain how the design of the EA1N and EA2 projects meet the National Infrastructure Commission's Design Principles for National Infrastructure (February 2020) in respect of Climate, Places, People and Value, both offshore and onshore and in all three phases of construction, operation and decommissioning.</p> <p>b) Comment on the desirability of implementing the following measures to ensure that good quality sustainable design and integration of the proposed substations and National Grid substation projects into the landscape is achieved in the detailed design, construction and operation of the projects. How might they be secured? Are any further measures appropriate?</p> <p>i) A 'design champion' to advise on the quality of sustainable design and the spatial integration of energy infrastructure structures, buildings, compounds, security</p>	<p>This issue concerns the design of the substation which is outside of the AONB and its immediate setting. NE only provides landscape planning advice for elements of a scheme affecting an AONB or National Park and therefore isn't able to contribute here. We expect that the local planning authority will wish to comment on design aspects of the substation. There are no 'design' issues within the AONB where the onshore cabling for the scheme would be undergrounded.</p> <p>We are content to advise the LPA on any ecology/landscaping matters where requested</p>	No further comment



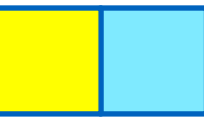
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		<p>fences, landscape, heritage, woodland, new landscape features, public rights of way and visual amenity.</p> <p>ii) A 'design review panel' to provide informed 'critical-friend' comment on the developing sustainable design proposals;</p> <p>iii) An approved 'design code' or 'design approach document' (as approved in the Hinkley Point C Connector Project (EN020001)) to set out the approach to delivering the detailed design specifications to achieve good quality sustainable design;</p> <p>iv) An outline, including timeline, of the proposed design process, including consultation with stakeholders and a list of proposed consultees.</p> <p>v) In the opinion of the local authorities and other statutory agencies, would the implementation of any or all of the above measures assist in determining post-consent approvals (including the discharge of requirements) in relation to achieving good design?</p>		
1.0.8	Historic England	1 2	<p>Design Principles</p> <p>a) In the context of EN-1 paragraph 4.5.5, explain how the design of the EA1N and EA2 projects meet the National Infrastructure Commission's Design Principles for National Infrastructure (February 2020) in respect of Climate, Places, People and Value, both offshore and onshore and in all three phases of construction, operation and decommissioning.</p> <p>b) Comment on the desirability of implementing the following measures</p>	<p>No comment</p> <p>No further comments</p>



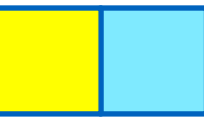
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		<p>to ensure that good quality sustainable design and integration of the proposed substations and National Grid substation projects into the landscape is achieved in the detailed design, construction and operation of the projects. How might they be secured? Are any further measures appropriate?</p> <ul style="list-style-type: none"> i) A 'design champion' to advise on the quality of sustainable design and the spatial integration of energy infrastructure structures, buildings, compounds, security fences, landscape, heritage, woodland, new landscape features, public rights of way and visual amenity. ii) A 'design review panel' to provide informed 'critical-friend' comment on the developing sustainable design proposals; iii) An approved 'design code' or 'design approach document' (as approved in the Hinkley Point C Connector Project (EN020001)) to set out the approach to delivering the detailed design specifications to achieve good quality sustainable design; iv) An outline, including timeline, of the proposed design process, including consultation with stakeholders and a list of proposed consultees. v) In the opinion of the local authorities and other statutory agencies, would the implementation of any or all of the above measures assist in determining post-consent approvals (including the discharge of requirements) in relation to achieving good 		



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1.0.8	SASES	<p>design?</p> <p>Design Principles</p> <p>a) In the context of EN-1 paragraph 4.5.5, explain how the design of the EA1N and EA2 projects meet the National Infrastructure Commission's Design Principles for National Infrastructure (February 2020) in respect of Climate, Places, People and Value, both offshore and onshore and in all three phases of construction, operation and decommissioning.</p> <p>b) Comment on the desirability of implementing the following measures to ensure that good quality sustainable design and integration of the proposed substations and National Grid substation projects into the landscape is achieved in the detailed design, construction and operation of the projects. How might they be secured? Are any further measures appropriate?</p> <p>i) A 'design champion' to advise on the quality of sustainable design and the spatial integration of energy infrastructure structures, buildings, compounds, security fences, landscape, heritage, woodland, new landscape features, public rights of way and visual amenity.</p> <p>ii) A 'design review panel' to provide informed 'critical-friend' comment on the developing sustainable design proposals;</p> <p>iii) An approved 'design code' or 'design approach document' (as approved in the Hinkley Point C Connector Project (EN020001)) to set out the approach to delivering the detailed design specifications to achieve</p>	<p>See SASES WR Rochdale Envelope and Substation Design</p> <p>See attached response prepared by Rupert Taylor (Acoustic expert) in respect of Noise related matters</p>	<p>Please refer to the Noise and Vibration Clarification Note which has been submitted at this Deadline (ExA.AS-8.D2.V1). This note provides further information and clarification the baseline noise survey, the construction phase assessment and the operation phase assessment.</p> <p>The Applicants note SASES' written submission and report prepared by Rupert Taylor and will respond at Deadline 4.</p>



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			<p>good quality sustainable design;</p> <p>iv) An outline, including timeline, of the proposed design process, including consultation with stakeholders and a list of proposed consultees.</p> <p>v) In the opinion of the local authorities and other statutory agencies, would the implementation of any or all of the above measures assist in determining post-consent approvals (including the discharge of requirements) in relation to achieving good design?</p>		
1.0.8	Save our Sandlings	1 2	<p>Design Principles</p> <p>a) In the context of EN-1 paragraph 4.5.5, explain how the design of the EA1N and EA2 projects meet the National Infrastructure Commission's Design Principles for National Infrastructure (February 2020) in respect of Climate, Places, People and Value, both offshore and onshore and in all three phases of construction, operation and decommissioning.</p> <p>b) Comment on the desirability of implementing the following measures to ensure that good quality sustainable design and integration of the proposed substations and National Grid substation projects into the landscape is achieved in the detailed design, construction and operation of the projects. How might they be secured? Are any further measures appropriate?</p> <p>i) A 'design champion' to advise on the quality of sustainable design and the spatial integration of energy infrastructure structures, buildings, compounds, security fences, landscape, heritage, woodland, new landscape features,</p>	<p>In its current configuration, the onshore substation structures are too large for the environment where they will be built and have a detrimental effect upon the lives and well-being of communities in the immediate area. Placing an extremely large industrial complex into a small rural village community is completely the wrong location. Buildings and industrial equipment of this size and complexity should be located on brownfield sites and not result in the removal of productive agricultural land, and green spaces enjoyed by local residents and visitors alike. Fencing off vast areas will also drastically affect wildlife populations that rely on free-access across these open spaces for foraging, shelter and transit through the area. The area will be permanently disfigured by these projects. The wishes of local people have not been properly addressed and objections to proposals not sufficiently accepted or mitigated.</p>	<p>As outlined in the Project Update Note 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. Further information will be provided at Deadline 3.</p> <p>To mitigate the assessed landscape and visual effects of the onshore substations, the Applicants have proposed a landscaping scheme as part of the OLEMS (APP-584). The final Landscape Management Plan must be submitted to and approved by the relevant planning authority prior to the commencement of onshore works, as secured through Requirement 14 of the draft DCO (APP-023). The Landscape Management Plan must be implemented as approved, in accordance with Requirement 15 of the draft DCO. The Applicants note that the maintenance of landscape planting is currently under discussion with the Councils within the SoCG process.</p>



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			<ul style="list-style-type: none"> ii) public rights of way and visual amenity. iii) A 'design review panel' to provide informed 'critical-friend' comment on the developing sustainable design proposals; iv) An approved 'design code' or 'design approach document' (as approved in the Hinkley Point C Connector Project (EN020001)) to set out the approach to delivering the detailed design specifications to achieve good quality sustainable design; v) An outline, including timeline, of the proposed design process, including consultation with stakeholders and a list of proposed consultees. vi) In the opinion of the local authorities and other statutory agencies, would the implementation of any or all of the above measures assist in determining post-consent approvals (including the discharge of requirements) in relation to achieving good design? 		
1.0.8	SEAS	1 2	<p>Design Principles</p> <ul style="list-style-type: none"> a) In the context of EN-1 paragraph 4.5.5, explain how the design of the EA1N and EA2 projects meet the National Infrastructure Commission's Design Principles for National Infrastructure (February 2020) in respect of Climate, Places, People and Value, both offshore and onshore and in all three phases of construction, operation and decommissioning. b) Comment on the desirability of implementing the following measures to ensure that good quality sustainable design and integration of 	<p>We do not believe that the design meets these Principles with regard to Places, People and Value.</p> <p>1. Climate</p> <p>In terms of Climate, we hope that wind energy helps achieve our zero emission targets. East Anglia is due to generate 44% of the UK's total wind power by 2030. We are delighted that our wind energy will be for the public good. SPR has not got a good track record for delivering the amount of electricity that it has been mandated to supply and that it has agreed to deliver. We cannot trust SPR to deliver what it is proposing to deliver.</p> <p>2. Places</p> <p>With regard to Places, these plans despoil medieval villages, destroy prime agricultural land, bisect rare habitats and undermine low wetlands and heathlands. Nothing in these plans gives reassurance that the impact is "moderate". We list in our other Written Representations detailed findings relating</p>	<p>The Applicants note the matters raised in SEAS response to the Examining Authority's Written Questions.</p> <p>1. The Applicants note the assertion that 'SPR has not got a good track record for delivering the amount of electricity that it has been mandated to supply'. The Applicants refer to their response to question 1.0.8 set out within the Applicants' Responses to Examining Authority's Written Questions submitted to the Examinations at Deadline 1 (REF1-105).</p> <p>2 – 5 No further comment</p>



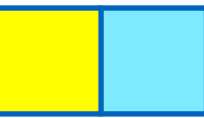
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		<p>the proposed substations and National Grid substation projects into the landscape is achieved in the detailed design, construction and operation of the projects. How might they be secured? Are any further measures appropriate?</p> <ul style="list-style-type: none"> i) A 'design champion' to advise on the quality of sustainable design and the spatial integration of energy infrastructure structures, buildings, compounds, security fences, landscape, heritage, woodland, new landscape features, public rights of way and visual amenity. ii) A 'design review panel' to provide informed 'critical-friend' comment on the developing sustainable design proposals; iii) An approved 'design code' or 'design approach document' (as approved in the Hinkley Point C Connector Project (EN020001)) to set out the approach to delivering the detailed design specifications to achieve good quality sustainable design; iv) An outline, including timeline, of the proposed design process, including consultation with stakeholders and a list of proposed consultees. v) In the opinion of the local authorities and other statutory agencies, would the implementation of any or all of the above measures assist in determining post-consent approvals (including the discharge of requirements) in relation to achieving good design? 	<p>to Places under threat from Friston to Thorpeness and in particular the AONB, the SSSI and the low wetlands. Also, our rural lanes are precisely that. Making them into highways will destroy the essential character of these rural communities.</p> <p>SPR is judged by SEAS to be looking through very rose-tinted glasses at the impact scores</p> <p>3. People</p> <p>With regard to People, as SEAS has shown in its video films (sent to the Inspectors on 28 October 2020) there are local people suffering already from anxiety and frustration. Alan Cardy has suffered a stroke, and his wife subsequently. Their home abuts the designated site. Others are sick with worry. SPR never consulted properly. Bringing a few PR executives and a manager to meet in village halls who fail to disclose the scale of the plans is disgraceful. To focus the conversation on superficial aspects such as the Design Council's input rather than on the serious impact these plans will have on ordinary people's lives is insulting and callous. For National Grid, the true architect of this mega hub to hide behind SPR is cowardly. To withhold the enormity of the combined projects until the last minute is disingenuous. To even consider Friston as a suitable site for the largest industrial complex of its kind in Europe is irrational.</p> <p>As young Friston resident Natasha said : "...do not think that you are doing this in my name or my brother's. This is dirty green energy."</p> <p>Not only is it dirty because it despoils virgin countryside and a medieval village, but it is dirty because it brings noise, light and dust pollution; dirty because the air quality for children and the elderly matters and as we indicate in our Written Representation on Air Quality, the Tropospheric ozone levels will reach an unacceptable threshold. SEAS supporters in their thousands come from every background. Local fishermen, teachers, shop assistants, hoteliers, waiters and waitresses, farmers, engineers, plumbers, electricians, pensioners, students, doctors, carers, nurses, entrepreneurs, artists, musicians, lawyers, accountants, builders, producers, social workers, homemakers and decorators. We are from a large area way beyond the designated site. We don't come from Friston. We have supporters from all over the country who are fighting for a principle. We are representative of the population as a whole. This is not 'An upper middle-class NIMBY outcry.' This is not party political. This campaign has brought diverse local communities together and greater bonds have been made through a common mission with a unified purpose.</p> <p>We are speaking with one voice when we say that SPR and National Grid have paid 'scant regard' for local people.</p> <p>If these developers cared about the well-being and health of local people, they could not have even started to contemplate Friston as an option.</p> <p>If these plans go ahead, we know that the tourism downturn will be inevitable as visitors find more attractive places to go and as much as £40 million loss each year for 12 to 15 years will result in an overall loss of £600m to £700m. Aldeburgh is located only 3.9 miles from Friston. To reach Aldeburgh one has to take the A12 and the A1094 if coming from the South. That is the main arterial</p>	



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			<p>road for the EA1N and EA2 lorries and vans. Aldeburgh will become a ghost town, retail shops will close, restaurants and hotels will fold, job losses will be significant. The ripple effect will be material.</p> <p>Yet, SPR states: "...No significant tourism and recreation impacts were predicted as a result of the proposed EA2 project. Tourism and recreation receptors would experience minimal visual impacts..." The social issues springing from a combination of tourism and economic downturn and unhappy or bored temporary workers is an invitation for social disorder and upset. In our Written Representation, we discuss in detail the tourism downturn and the social issues.</p> <p>4. Value</p> <p>Value is the hardest thing to quantify. The traditional cost benefit analysis is no longer fit for purpose. It is a linear measurement. If this project costs X and it costs X + Y to move it to Bradwell, for example, then the costs analysts would say 'no, it's not in the interest of customers...' Value is not about a narrow cost benefit analysis. We need to initiative a new mathematical equation which factors in the following:</p> <ol style="list-style-type: none"> 1. The cost to the environment 2. The cost to the habitats 3. The cost to the tourism sector 4. The cost to the economy as a whole, including job losses 5. The cost to people's well-being and health, from anxiety and poor air quality and other pollution 6. The cost to social order and stability 7. The cost to safety These criteria need to be weighted according to their true importance to Society as a whole. It is not for SPR or National Grid to determine the weighting. It should be a world recognised analytical framework used by credited World Health and Environment Organisations. <p>The alternative locations to be considered would need to be reassessed using this new Value equation, and factoring in mid-term cost synergies and efficiencies to be gained through integrated offshore solutions landing at brownfield sites.</p> <p>How do we value the environment? How do we value low wetland? How do we value ancient woodland? How do we value an old hedgerow? How do we value the threatened species which make habitats here? Or pass through this area? Or live here in their herds or groupings? We would suggest that when you reassess the Value of this plan there will be a crystal-clear decision that the severe adverse impacts outweigh the benefits and that an alternative Brownfield site using integrated offshore technology should be.</p> <p>5. Offshore</p> <p>We do not cover offshore issues because we have no knowledge of those except that we are concerned about porpoises and the kittiwakes as discussed in our Written Representation on Habitats, referenced by the Norfolk examinations as well as by the Suffolk.</p>	



ExA. Question Ref.	Question addressed to	1	2	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
					<p>b)</p> <p>"Sustainable": meaning. This does not just relate to the purpose of the construction but also to the IMPACT of that construction. In other words, these plans, in our opinion, do not deserve the label of "sustainable design". We cannot comment on the desirability of design inputs because we are asking the Examiners to reject these plans. There is no acceptable mitigation as far as SEAS supporters are concerned.</p>	
1.0.16	National Grid Electricity Transmission			<p>Site selection: Friston grid connection point (Grove Wood)</p> <p>In paragraph 17 of Appendix 4.2 (RAG Assessment for Onshore Substations Site Selection in the Sizewell Area) [APP-443] you say that <i>"The onshore study area was extended westward following consultation with Suffolk County Council (July, 2017) to look further west by potentially crossing Aldeburgh Road. This area was previously excluded due to the potential interaction with residential titles."</i></p> <p>You also note that <i>"Aldeburgh Road would potentially act as a significant constraint, and that extension (of the study area) westwards would be counter to the achievement of economy and efficiency"</i> but nevertheless <i>"the onshore study area was proposed for extension."</i></p> <p>a) A substantial apparent reason for extending the study area westwards appears to have been that the Grove Wood pylon, being more substantial, might not require such extensive modification as other straight-through pylons to the east (i.e. towards Sizewell). Were there other technical reasons that bore on location selection?</p> <p>b) Given the impacts on residential property, economy and efficiency, and that the dDCO is principally intended to authorise the construction and operation of an Offshore Wind Farm, please explain why the substation site at Grove Wood was chosen and not a site further east?</p> <p>c) Could the length of the onshore cable route have been reduced, removing or reducing the need to cross the Leiston-Aldeburgh SSSI or the</p>	<p>a) NGET considers that the promoter is best placed to answer this question in relation to the reasons for extending the study area westwards. From a technical perspective NGET can confirm that a tension tower (pylon) as at Grove Wood is not a requirement for making a connection.</p> <p>NGET considers that questions (b) and (c) are questions that the promoter is best placed to answer.</p>	<p>As noted in the Applicants' Responses to Examining Authority's Written Questions (REP1-105) submitted at Deadline 1, the main driver for extending the onshore study area westwards was the avoidance of impacts upon the Suffolk Coast and Heaths AONB.</p>



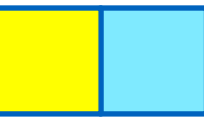
ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<p>Sandlings SPA, and eliminate the need for the remainder of the onshore cable route to follow essentially the existing National Grid overhead lines all the way to Grove Wood, with all the associated impacts, particularly on residents and the natural environment?</p> <p>To the extent that responses to this question rely on any advice to the Applicant from National Grid that this location was broadly preferred by National Grid, the Applicant is asked to document that advice. National Grid may comment at Deadline 2.</p>		
1.0.17	National Grid System Operator	<p>1 2 Site selection: Friston grid connection point In OFHs 1 – 2 (7 – 9 October 2020), a common emerging theme from oral submissions was that the Friston connection point location had perhaps been selected at least in part because it offered potential expandability.</p> <p>a) Do you understand this to be the case?</p> <p>It was suggested that a number of further grid connection offers have either been formally made or informally proposed by National Grid that could have the effect of bringing further transmission connections to this location.</p> <p>b) Please catalogue any additional connection offers that have been made on a formal or informal basis of which you are aware and submit the best available summary descriptions of the name, purpose, developer and effects of any additional connection proposals that might use this location.</p> <p>To the extent that responses to this question by the Applicant rely on any advice to the Applicant from National Grid, the Applicant is asked to document that advice. National Grid may comment at Deadline 2.</p>	<p>b) NGESO cannot comment on any unsigned connection agreements or any informal connection queries as this is commercially sensitive between the ESO and other parties. NGESO publishes a register of all contracted connection offers on its website. This is updated weekly (see www.nationalgrideso.com/connections/registers-reports-and-guidance).</p>	No further comments



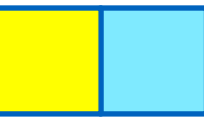
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1.0.17	National Grid Electricity Transmission	1 2 Site selection: Friston grid connection point In OFHs 1 – 2 (7 – 9 October 2020), a common emerging theme from oral submissions was that the Friston connection point location had perhaps been selected at least in part because it offered potential expandability. a) Do you understand this to be the case? It was suggested that a number of further grid connection offers have either been formally made or informally proposed by National Grid that could have the effect of bringing further transmission connections to this location. b) Please catalogue any additional connection offers that have been made on a formal or informal basis of which you are aware and submit the best available summary descriptions of the name, purpose, developer and effects of any additional connection proposals that might use this location. To the extent that responses to this question by the Applicant rely on any advice to the Applicant from National Grid, the Applicant is asked to document that advice. National Grid may comment at Deadline 2.	a) NGET considers that the promoter is best placed to address matters relating to the site selection process. b) This is a question for NGENSO to respond to. NGET may comment at Deadline 2 as appropriate	No further comments
1.0.18	SCC, ESC	1 2 Site selection: Friston grid connection point To the extent that it was suggested at OFHs 1 – 2 that there may be additional grid connection proposals for this location, please catalogue any additional connection offers of which you are aware that have been made on a formal or informal basis and submit the best available summary descriptions of the name, purpose, developer and effects of any additional connection proposals that might use this location.	<i>ESC Lead Authority</i> The Councils are aware of the following grid connection proposals: <u>Nautilus and Eurolink Interconnectors</u> Nautilus Interconnector – 1.4GW HVDC subsea electricity link between GB and Belgium – Developer is National Grid Ventures (NGV) – Expected operation date 2028. The project has a webpage on the National Grid website https://www.nationalgrid.com/group/about-us/what-we-do/national-grid-ventures/interconnectors-connecting-cleaner-future/nautilus . A Briefing Pack containing information on the Nautilus project is also available (https://www.nationalgrid.com/document/125601/download). Eurolink Interconnector – 1.4GB HVDC subsea electricity link between GB and Netherlands – Developer is NGV. It is known that the projects are considering a landfall point between Thorpeness and Sizewell and will require cabling to a converter station location and National	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): <ul style="list-style-type: none">• Nautilus;• EuroLink;• Greater Gabbard Offshore Windfarm Extension; and



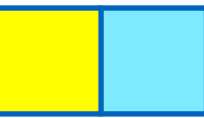
ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			<p>Grid connection substation. A typical footprint for a converter station requires an area of five hectares with a maximum height of 24 metres. National Grid Electricity System Operator (NG-ESO) has provided grid connection offers for both Nautilus and Eurolink to a new 400kV substation located close to the Sizewell 400kV network.</p> <p>The connection offer is identified on the Interconnector TEC register on the National Grid website (https://www.nationalgrideso.com/connections/registers-reports-and-guidance). The point of connection is known to be the National Grid substation proposed under the EA1N and EA2 projects at Friston.</p> <p>NGV has stated that for Nautilus and Eurolink to connect to the National Grid substation at Friston, the substation would require an extension for each project. NGV has confirmed that the maximum land take required to facilitate the extension is approximately 1.3 hectares for each connection offered (https://www.nationalgrid.com/document/132456/download).</p> <p><u>Galloper Extension/Five Estuaries Offshore Windfarm</u></p> <p>Galloper Extension/Five Winds Offshore Windfarm – Capacity 353MW – Developer formerly Innogy now RWE – Round 3</p> <p>In August 2019, the Crown Estate announced the conclusions of the Habitats Regulations Assessment (HRA) confirming that seven projects including the Galloper Extension project were granted development rights.</p> <p>The National Grid TEC register of connections identifies a connection offer for the Galloper Extension project (https://www.nationalgrideso.com/connections/registers-reports-and-guidance). An e-mail sent from the developer to a Town Council in East Suffolk confirmed that the connection offer from NG-ESO relates to the substation proposed at Friston (See Appendix A of this document).</p> <p>Although there is limited information within the public domain on this project, it is considered that National Grid could provide an estimation for the footprint of the extension required to the National Grid substation to accommodate this project.</p> <p><u>Greater Gabbard Extension/North Fall Offshore Wind Farm</u> Greater</p> <p>Gabbard Extension/North Falls Offshore Wind Farm – Capacity – 504MW – Developed by SSE Renewables and RWE – Expected operational date 2030.</p> <p>In August 2019, the Crown Estate announced the conclusions of the HRA confirming that the Greater Gabbard Extension project was granted development rights. It is understood that the Agreement for Lease has not also been signed.</p> <p>At present there is no record of a connection offer on the National Grid connections register but a connection offer is anticipated shortly given that an Agreement for Lease has been signed and the website identifies that from 2020</p>	<ul style="list-style-type: none"> Galloper Offshore Windfarm Extension. <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>



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			project design work and community engagement will commence (https://www.northfallsoffshore.com/).	
1.0.18	SASES	1 2 Site selection: Friston grid connection point To the extent that it was suggested at OFHs 1 – 2 that there may be additional grid connection proposals for this location, please catalogue any additional connection offers of which you are aware that have been made on a formal or informal basis and submit the best available summary descriptions of the name, purpose, developer and effects of any additional connection proposals that might use this location.	See SASES WR Cumulative Impact Assessment	The Applicants' note the written representation made by SASES regarding cumulative impact assessment and will respond at Deadline 3.
1.0.18	Save our Sandlings	1 2 Site selection: Friston grid connection point To the extent that it was suggested at OFHs 1 – 2 that there may be additional grid connection proposals for this location, please catalogue any additional connection offers of which you are aware that have been made on a formal or informal basis and submit the best available summary descriptions of the name, purpose, developer and effects of any additional connection proposals that might use this location.	<p>The design as presented by the applicant fails to meet the National Infrastructure Commission's Design Principles for National Infrastructure (February 2020) in respect of Places, and People and an independent review of the proposed infrastructure must be held.</p> <p>It is our belief that if National Grid decision to site such a large substation complex in any of the seven proposed locations had been subject to examination and review prior to the applicant being offered a connection, the examining committee would decide the proposal is not only in completely the wrong area, but far too large for a rural location, and that brownfield sites should be investigated as a priority. This is even more relevant now that additional connection points have been offered to other energy providers. The decision to site the substation in the Sizewell / Leiston area has been made on purely commercial grounds with no regard to local communities or the environment. National Grid have failed to engage with local communities, opting to hide in the background and expect developers to work out the details. Failure of National Grid to engage properly has led to the current state of affairs. Proposals of this magnitude will never be acceptable to the local communities, and each and every subsequent NSIP application will be met with similar opposition and dismay. The problem will only get worse, especially as the relentless juggernaut of energy projects is set to continue for the foreseeable future.</p> <p>The proposal to bring cables ashore at the fragile Thorpeness cliffs have not been sufficiently explored by the applicant. These cliffs have a history of instability and have resulted in the unfortunate death in January 2017. Each year the cliffs and shoreline suffer erosion during winter storm surges prompting the local council to respond .</p>	<p>The Applicants disagree that the design presented fails to meet National Infrastructure Commission's Design Principles for National Infrastructure (February 2020) in respect of Places, and People.</p> <p>The Applicants selected the onshore substation and National Grid substation locations to reflect the requirements of the Projects only and did not consider potential expansion of the National Grid substation. Selecting sites for the onshore substations and National Grid substation was a process that considered multidisciplinary principles and criteria that were selected based on well established guidelines. The process, along with the various options considered and the reasons for their dismissal / selection is fully detailed in section 4.9 of ES Chapter 4 Site Selection and Alternatives (APP052).</p> <p>As outlined in the Project Update Note 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. Further information will be provided at Deadline 3.</p> <p>The Applicants have submitted an Outline National Grid Substation Design Principles Statement to Examination at Deadline 1 (REP1-046), and the Applicants will amend the draft DCO (APP-023) at Deadline 3 to require the final details of the layout, scale and external appearance of the National Grid substation to be in accordance with the Outline</p>



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
				<p>National Grid Substation Design Principles Statement.</p> <p>As detailed within the draft Statement of Common Ground with National Grid Electricity Transmission plc: (REP1-064) "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>An update to the Outline Onshore Substation Design Principles Statement (APP-585) and Outline Onshore National Grid Substation Design Principles Statement will be submitted at Deadline 3 to provide further details of the proposed design process. It is the Applicants' intention to progress the detailed design with the Councils in the first instance from early 2021.</p> <p>A commitment has been made to install the export cable at the landfall using trenchless techniques, thus minimising disturbance to the cliffs and SSSI. Details of the methodology and rationale behind this technique are presented in the Outline Landfall Construction Method Statement (REP1-042), submitted at Deadline 1. Monitoring of the landfall will be undertaken as set out in section 3 of the method statement which is secured under Requirement 13 of the draft DCO (APP-023), of which an updated draft will be submitted at Deadline 3.</p> <p>The Outline Landfall Construction Method Statement provides outline information regarding the HDD design and methodology respectively. Detailed parameters such as length, depth and angles of the drilling will be subject to detailed design and will be provided in the final Landfall Construction Method Statement which is secured under Requirement 13 of the draft DCO (APP-023), of which an updated draft will be submitted at Deadline 3.</p> <p>The infrastructure associated with the trenchless technique at landfall has been appropriately sited based on the Applicants' identification of the potential 100-year erosion prediction line which allows for coastal erosion over the entire duration of the project (Appendix 4.6 (APP-447)). The 100- year erosion prediction line is based on the current management measures of the Shoreline Management Plan and additional analysis of the characteristics and</p>



ExA. Question Ref.	Question addressed to			ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
						behaviour of the shoreline as presented in section 2 of Appendix 4.6. (APP-447).
1.0.18	SEAS	1	2	Site selection: Friston grid connection point To the extent that it was suggested at OFHs 1 – 2 that there may be additional grid connection proposals for this location, please catalogue any additional connection offers of which you are aware that have been made on a formal or informal basis and submit the best available summary descriptions of the name, purpose, developer and effects of any additional connection proposals that might use this location.	Please see ExQ 1.14.5 for SEAS response to this question.	Noted.



2.2 Biodiversity, Ecology and Natural Environment

ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
1.2 Biodiversity, Ecology and Natural Environment (including Habitats Regulations Assessment (HRA))					
Over-arching HRA					
1.2.1	Natural England		<p>2 Habitats Regulations Assessment (HRA) Project Description: EA2</p> <p>There appear to be some differences between the project description reported in Chapter 6 of the submitted Environmental Statement (ES) [APP- 054] and that in the HRA Screening Report [APP-044]. Specifically, the former states that the offshore array area would be approximately 218.4km² whereas the latter states that it would be approximately 255km². There are also differences in the overall area of the offshore export cable.</p> <p>The ES explains that a reduction in the wind farm area was made in May 2019. The HRA Screening Report [APP-044] states that the screening conclusions drawn from the project description at the time of screening (before that time) remain the same.</p> <p>a) Could the Applicant please explain how the updated project description has affected the zone of influence of potential impacts on European Sites? How would the updated Project Description change the screening exercise reported?</p> <p>Does Natural England have any comments on the Zone of Influence applied to the screening assessment, in addition to its request for additional screening of the sites listed on page 2 and 3 of [APP-043]?</p>	<p>The screening was for a larger area given the pre May 2019 array footprint. Therefore Natural England is content that the difference in scoping area doesn't impact on the advice we have already submitted at RR-059.</p>	<p>No further comments</p>
1.2.6	Natural England	1	<p>2 HRA: Screening Conclusions</p> <p>Could Natural England please comment on its satisfaction with the scope and conclusions of the Applicant's HRA screening exercise as reported in [APP-044] and [APP-045]? If this is dealt with through the SoCGs due at Deadline 1 there is no need for repetition here.</p>	<p>Natural England are satisfied with the HRA Screening exercise.</p>	<p>This is reflected in the SoCG submitted at Deadline 1.</p>
1.2.9	Natural England	1	<p>2 HRA: Draft Review of Consents for Major Infrastructure Projects and Special Protection Areas</p> <p>In August 2020, the Department for Business, Energy and Industrial Strategy (BEIS) published a Draft Review of Consents for Major Infrastructure Projects and Special Protection Areas.</p> <ul style="list-style-type: none"> Could the Applicant and Natural England please comment on the relevance of that draft 	<p>Natural England's view is that the BEIS Review of Consents for Major Infrastructure Projects and SPAs is highly relevant. Natural England and JNCC have advised that the Appropriate Assessment should include red throated diver as an interest feature for the Outer Thames Estuary SPA.</p> <p>Natural England also advised that East Anglia One North and East Anglia Two are among the list of projects that should be considered in the in-combination assessment.</p> <p>Please see Deadline 1 Appendix A5.</p>	<p>The Applicants refer to their response to Q1.2.9 in <i>Applicants' Responses to Examining Authority's Written Questions</i> (REP1-107).</p>



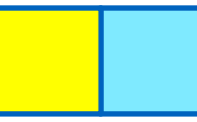
ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			review to the HRA for the EA1N and EA2 projects?		
Offshore Ornithology					
1.2.10	Natural England	1	<p>2 Outer Thames Estuary SPA: Operation and Maintenance Vessel Traffic The Applicant has responded (Point 2, Table 35 of [AS-036]) to Natural England's advice in relation to red-throated diver impacts arising from offshore site maintenance vessel traffic during the operation phase.</p> <p>a) Please could Natural England comment on its satisfaction with the Applicant's response?</p> <p>b) Specifically, to what extent does Natural England consider that the '<i>best-practice protocol for minimising disturbance to red-throated divers</i>' referred to by the Applicant would assist and is it adequately secured by the DML conditions pertaining to a project environmental management plan?</p> <p>c) Is Natural England satisfied that adequate safeguards against red-throated diver disturbance are secured in that event that helicopters are used for maintenance activities?</p>	<p>a) Partly satisfied, but as the location of the O&M port is not known at this stage, Natural England recommends that the Applicant commits to mitigating impacts from vessels in future by commitment to best practice measures. Please see NE Deadline 1 Appendix A1b.</p> <p>b) Natural England notes that within both DMLs a condition requiring the production of an Environmental Management Plan is included. Within this condition it is secured that they will need to provide procedures to minimise disturbance to red-throated diver. We are content that this ensures the mitigation can be secured.</p> <p>c) We are not aware of any evidence which recommends a minimum safe flight height for helicopters to avoid disturbance of divers. We would wish to see a minimum flight height restriction (based on best available evidence) to apply anywhere within the OTE SPA. This needs further consideration and securing within the DML.</p>	<p>(a) See the Applicants response to point 2 of NE's Appendix A1b</p> <p>(b) No further comment</p> <p>(c) If used, helicopters would only transit the SPA as there is no surface infrastructure within the SPA itself. NE is not aware of any evidence relating to disturbance from helicopters /flight height and neither are the Applicants. The Applicants consider a flight height restriction to be unnecessary and unjustified and as such, it would not be appropriate or reasonable for such a restriction to be secured within the DMLs.</p>
1.2.13	Natural England	1	<p>2 Outer Thames Estuary SPA: Seasonal Restriction on Cable Laying</p> <p>a) Please could Natural England respond to the Applicant's comments [AS-036] with regard to Point 5 of the Natural England relevant representation (RR) [RR-059], on the question of whether a seasonal restriction on cable-laying activity is necessary to minimise effects on red-throated diver?</p> <p>b) Could Natural England please clarify whether its comment at Point 5 that '<i>we are already unable to rule out AEOI in-combination from displacement as a result of disturbance within the SPA</i>' is referring to in-combination displacement due to already consented and operational projects, notwithstanding the East Anglia ONE North and TWO projects?</p>	<p>a) Please see NE Deadline 1 Appendices A1b, A4 and A5</p> <p>b) Yes, our response is referring to in-combination displacement due to already consented and operational projects. Please see NE Deadline 1 Appendix A4.</p>	<p>(a) No further comments</p> <p>(b) No further comments</p>
1.2.14	Natural England	1	<p>2 Collision Risk Modelling (CRM) Parameters The Applicant has responded to Natural England's advice about CRM parameters at Section 2 of Table 35 of [AS-036].</p> <p>a) Please could Natural England comment on any aspects of the Applicant's response that it still considers to be a cause for concern.</p> <p>b) In particular, how does Natural England</p>	<p>NE is aware that the applicant is updating and therefore we will respond at Deadline 2 once submitted into examination.</p> <p>Please also see Deadline 1 Appendix A1b in relation to our response on [AS-036].</p>	No further comments



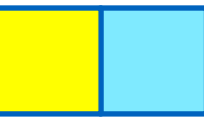
ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			respond to the Applicant's position that option 1 collision estimates are unreliable to an unknown extent due to limitations in the method for estimating seabird flight height estimates in this case?		
1.2.16	Natural England	1	<p>2 Avoidance Rates for Kittiwake and Gannet</p> <p>Natural England acknowledges that higher avoidance rates for gannet and kittiwake have been recommended by Bowgen & Cook (2018) and notes in[RR-059] that it is currently considering its response to those recommendations.</p> <ul style="list-style-type: none"> Can Natural England provide an update on its response to these recommendations; is it likely to be forthcoming within the timescale of this Examination? 	<p>Natural England and the Statutory Nature Conservation Bodies (SNCBs) are currently reviewing the evidence on avoidance rates presented in Bowgen & Cook (2018), and its applicability to SNCB advice on CRM. As part of this work, Natural England have recently commissioned the BTO to undertake work, including combining Avoidance rates from the 2014 review with the Avoidance Rates from Bowgen & Cook (2018). Until that work is complete, Natural England's position remains that the appropriate Avoidance Rates to use with Band (2012) model are those set out in the SNCB guidance note JNCC et al. (2014), i.e. 98.9% for gannet and kittiwake with the 'Basic' Band model (i.e. Options 1 and 2).</p> <p>The work by the BTO required to inform the revision of the SNCB advice will be completed by March 2021 at the latest, and may be forthcoming within the timescale of the Examination, but unlikely.</p>	No further comments
1.2.18	Natural England	1	<p>2 Cumulative and In-Combination Assessments for Offshore Ornithology</p> <p>The Applicant has responded to Natural England's advice about cumulative and in-combination assessments at Sections 3 and 4 of Table 35 of [AS- 036], albeit that its responses on many aspects of this topic were deferred until after the decision deadline for the Norfolk Vanguard and Hornsea Three projects.</p> <p>a) In providing its updated information to inform appropriate assessment at Deadlines 1 and 3 (as confirmed in [AS-061]), please could the Applicant respond in full to those aspects of Natural England's advice [RR-059] and RSPB's representation [RR-067] to which it has not yet responded.</p> <p>b) Where the Applicant has provided a substantive response to Natural England's points in [AS-036], please could Natural England comment on its satisfaction with those responses.</p>	NE confirms we will provide further advice once further updates are provided. However, further NE advice is provided at Deadline A1b which responds to [AS-036].	No further comments
1.2.19	Natural England	1	<p>2 Cumulative and In-Combination Assessment for Offshore Ornithology: Applicant's Precaution Note</p> <p>The Applicant submitted an Offshore Ornithology Precaution Note as Appendix 4 to its Rule 9 submissions [AS-041].</p> <ul style="list-style-type: none"> Please could Natural England provide its comments on the content of this note as it relates 	Please see NE Deadline 1 response Appendix A3.	No further comments



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			to the proposed development?		
1.2.20	Natural England	1	2 Ornithological Population Effects of Predicted Mortality Rates: Monitoring Studies <ul style="list-style-type: none"> Are the Applicant or Natural England aware of any monitoring studies having been undertaken on the observed ornithological population effects of predicted mortality rates from offshore wind farm impacts (displacement and/or collision), and the outcomes of these studies? If so, please provide details. 	<p>i) Displacement Natural England is not aware of any studies providing evidence of mortality effects as a result of displacement.</p> <p>ii) Collision For impacts on collision, there have been very few empirical studies looking at collisions at offshore windfarms. The only UK published study Natural England is aware of is the ORJIP (Offshore Wind Joint Industries Project) at Thanet which recorded a total of 6 collisions. However this study covered a small number of turbines on a single windfarm, and therefore not of a scale that allows population effects of predicted mortality rates to be fully considered.</p> <p>For more information please see NE Deadline 1 response Appendix A1b</p>	No further comments
1.2.21	Natural England	1	2 Cumulative and In-Combination Assessment for Offshore Ornithology: Update Following Recent Decisions of the Secretary of State (SoS) <p>The ExAs note Natural England's intention [AS-063] to submit further advice at Deadline 1 about the Applicants' information to support appropriate assessment in light of the recent SoS decisions and in response to the questions raised in Procedural Decision 18(a).</p> <ul style="list-style-type: none"> The ExAs welcome additional clarity on Natural England's position in these respects and requests that its Deadline 1 submissions are as full and reasoned as possible. 	Our position on the HP3 and Norfolk Vanguard decisions hasn't changed since our Norfolk Boreas responses which we have been included at NE Deadline 1 response Appendix A6, A7 and A8.	No further comments
1.2.22	Natural England	1	2 Cumulative and In-Combination Assessment: Natural England Submissions to the Norfolk Boreas Examination <p>Natural England's [AS-063] suggests that its submissions to Deadline 14 of the Norfolk Boreas examination are of relevance to the ExA's consideration of the EA1N and EA2 applications.</p> <ul style="list-style-type: none"> Please could Natural England submit a copy of the relevant parts of that response (and any other submissions to the Norfolk Boreas examination that it considers to be of relevance to these projects) into the examinations for EA1N and EA2? 	Please see Norfolk Boreas responses which we have included at NE Deadline 1 response Appendix A6, A7 and A8.	No further comments
1.2.23	Natural England	1	2 Post-Construction Monitoring for Offshore Ornithology <p>The ExA notes both the concerns of Natural England at section 5 of [RR- 059] with respect to post-construction monitoring provisions and comments from the RSPB about the need for a more detailed post- construction monitoring plan at this stage.</p>	<p>b) Natural England disagrees with the assertion made in Section 1.6.7.2 of [APP-590] that the findings of the EIA suggest no monitoring is required. We advise that the requirements for project specific monitoring are reviewed following a robust and thorough HRA process in particular for the OTE SPA.</p> <p>c) Natural England is not satisfied that sufficient monitoring has been secured in the DMLs and there are no conditions within the DML to secure a requirement for ornithological monitoring. Please see Deadline 1 response Appendix A1b highlighting residual impacts where monitoring will be required.</p>	The Applicants consider that Natural England's concerns surrounding this matter will be addressed following submission of the updated draft DCO at Deadline 3 which will make provision for pre-construction and post-construction ornithological monitoring within the DMLs. See response to Point 48 of NE's Appendix A1b in Applicants' Comments on



ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			<p>a) Please could the Applicant respond to the comments of Natural England on this matter. What scope is there to include the areas suggested by Natural England for post-construction monitoring within the existing provisions of the dDCO/DMLs and/or Offshore In-Principle Monitoring Plan?</p> <p>b) Could Natural England please respond to the Applicant's clarification that the strategic monitoring to which it refers in section 1.6.7.2 of [APP-590] would not be secured within this DCO?</p> <p>c) On the basis of this clarification, is Natural England satisfied that sufficient post-construction monitoring provisions for offshore ornithology are secured within the dDCO, DMLs and Offshore In- Principle Monitoring Plan? If not, what changes would it advise?</p>		Natural England's Deadline 1 Submissions (document reference ExA.AS-10.D2.V1).
1.2.25	Rijkswaterstaat	1	<p>2 Transboundary Effects: The Netherlands The ExA notes the content of the RR [RR-066] from Rijkswaterstaat (the Directorate-General for Public Works and Water Management/ Ministry of Infrastructure and Water Management of the Netherlands) regarding the Applicant's assessment of transboundary offshore ornithology effects. The draft SoCG [AS-048] notes that there is not yet agreement on this matter and that the next step is for the Applicant to respond to the RR. That response is set out in the Applicant's submission [AS-036].</p> <p>a) Does Rijkswaterstaat accept the Applicant's explanation of its approach? If not, please respond to the points raised in the Applicant's justification set out at Table 59 of [AS-036].</p> <p>b) In particular, does Rijkswaterstaat agree with the Applicant's statement that its HRA screening report [APP-044] and offshore ornithology cumulative impact assessment [APP-060] adequately take account of the effects on 'non-UK' birds?</p> <p>c) Could the Applicant please provide an updated position in the SoCG requested for Deadline 1.</p>	<p>a) Yes</p> <p>b) Yes, the outcomes of our cumulative impact assessment (KEC 3.0, all (inter)national operational and planned OWFs) led to the conclusion that for the selected birds, vulnerable for habitat loss of bird collisions, remained well within the PBR range. E.g. highest fraction of PBR for: Herring gull (collisions): fraction 0.33 of international PBR, Razorbill (habitat loss): fraction of 0.27 of the international PBR.</p>	No further comments
1.2 Biodiversity, Ecology and Natural Environment (including Habitats Regulations Assessment (HRA))					
Marine Mammals					
1.2.26	Marine Management Organisation (MMO)	1	<p>2 Inclusion of UXO Clearance Activities within DMLs The ExA notes the MMO's [RR-052] position that UXO (Unexploded Ordnance) clearance activities should not be included within the DMLs and rather should be determined via separate marine licence applications after the DCO consenting process and prior to construction. In Table 29 of [AS- 036] the Applicant has set out the reasons why it has taken</p>	<p>a). The MMO preference is for a separate marine licence to control UXO detonation activities, as this may allow for a more up to date assessment closer to the time of proposed UXO activities, including an assessment of other noisy activities in the area, which may not be known at the time of DCO consent. -If the UXO detonations are to be controlled via the DML, the condition should include a requirement that the relevant documents must be submitted to the MMO for approval in consultation with the relevant Statutory Nature</p>	(a) The Applicants intend to amend the UXO clearance condition (condition 16 of the generation DML and condition 12 of the transmission DML) to require submission of the plans at least three months prior to the



ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			<p>the approach it has taken and seeks to demonstrate how the DMLs adequately control UXO clearance activities. The submitted early draft SoCG [AS-051] states that discussion between the Applicant and the MMO on this matter is ongoing.</p> <p>a) Could the MMO please respond with reasons to the position set out by the Applicant, specifically that:</p> <ul style="list-style-type: none"> - UXO clearance activities are adequately assessed in the submitted ES; - the draft DML conditions provide adequately for post-consent approval by the MMO of mitigation for UXO clearance activities via the method statement for UXO clearance, the Marine Mammal Mitigation Protocol and the Site Integrity Plan; - to request that a separate marine licence application (or applications) is made would be contrary to one of the intended purposes of the DCO regime, to streamline multiple consenting processes; - a European Protected Species licence for any UXO campaign is capable of being applied for separately from the marine licensing of such activity, in an analogous way to the approach for piling activity authorised by DMLs; and, - in the event that UXO clearance activities are required beyond the scope of what has been assessed in the ES and applied for via the DMLs, then a separate marine licence can be applied for, rather than needing to vary the DMLs? <p>b) Please could the MMO provide a copy of the marine licence conditions for UXO clearance in its cited example of the Hornsea 2 project?</p> <p>c) Can the Applicant please provide any examples of other consented offshore wind projects which include UXO clearance works within the licensed marine activities covered by their DMLs? Where examples exist, please provide the text of deemed marine licence conditions dealing with UXO clearance activities.</p> <p>d) Please could the Applicant and MMO ensure that the SoCG requested for Deadline 1 provides an update on this matter.</p>	<p>Conservation Body no later than 6 months prior to the start of planned UXO activities unless otherwise agreed with the MMO. The MMO is keen that the condition ensures that these documents are submitted in a controlled way so as not to overwhelm the approval process. -The MMO acknowledges that requesting a separate marine licence application represents an additional consenting process. There are however other consented OWF DCOs which are required to submit separate marine licence applications, such as for Operational Maintenance activities.</p> <p>b). Please see Appendix 1 of this response which includes Hornsea Project Two UXO clearance marine licence conditions.</p> <p>d). The MMO submitted their response on this matter to the Applicant on 8 September 2020.</p>	<p>planned commencement of UXO clearance activities.</p> <p>This three month period is in line with the determination period for new marine licences and is therefore considered to be appropriate.</p> <p>Furthermore, given that UXO clearance is intended to proceed prior to commencement of construction, submission of the UXO plans would occur prior to submission of the information associated with construction (i.e. design plan, construction method statement, etc) and therefore not during a period where stakeholders are required to review a large number of documents in parallel (which we understand to be the key reason that has driven the general requirement for a six month review period for other pre-construction documentation).</p> <p>Additionally, as the impact assessment for UXO clearance has already been undertaken and is detailed within the Environmental Statement (notwithstanding that there are requirements for a method statement, marine mammal mitigation protocol (MMMP) and site integrity plan (SIP)), the volume of information required to be submitted will be slightly less than that required for a new marine licence application.</p> <p>The UXO clearance activities are appropriately controlled by the conditions of the DMLs. The Applicants highlight that an important purpose of the DCO regime is to streamline the consenting process which the Applicants have sought to facilitate by providing an assessment of UXO within the ES and the required conditions within the DMLs.</p> <p>The conditions regulating the UXO clearance activities require the submission of a method statement, MMMP and SIP prior to UXO activities being permitted. This allows for any relevant information to be taken into account at that time and so the MMO will have the most up to date information available to them when they review the the documents for approval.</p>



ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
					(b) No further comment (d) The Applicants remain in discussion with the MMO on this matter and will continue engagement throughout the Examination period.
1.2.27	Marine Management Organisation	1	2 UXO Clearance and Habitats Regulations Assessment In [RR-052], the MMO states in relation to UXO clearance and potential noise impacts on the Southern North Sea Special Area of Conservation (SAC) that ' <i>a more detailed Habitats Regulations Assessment of this activity should follow post-consent together with the submission of a detailed marine licence application for the required UXO campaign</i> '. <ul style="list-style-type: none"> Given that the Applicant seeks to include UXO clearance within the DMLs, does the MMO consider that the submitted Information to Support Appropriate Assessment and supporting material ([APP-043] – [APP-047]) provides sufficient information about, and assessment of, the potential effects on the integrity of the Southern North Sea SAC? 	The MMO defers to Natural England as to the adequacy of the document in relation to providing sufficient information about, and assessment of, the potential effects on the integrity of the Southern North Sea SAC. However, the MMO considers that appropriate conditions securing the management of this activity must be within the DML.	No further comment
1.2.28	Natural England	1	2 Disturbance of Harbour Porpoise from UXO Detonation and Piling: 20% Threshold Following Natural England's [RR-059], the Applicant notes in [AS-036] that its Information to Support Appropriate Assessment Report [APP-043] does not reflect the updated Conservation Objectives for the Southern North Sea SAC insofar as they state that disturbance of harbour porpoise will not exceed ' <i>20% of the relevant area of the site in any given day</i> '. The Applicant accepts that two events of either UXO clearance or piling (or a combination of both) in a single day would exceed the 20% limit for the winter area only, with no exceedance for the summer area. <ul style="list-style-type: none"> a) Please could the Applicant update the relevant sections of its Information to Support Appropriate Assessment Report [APP-043] (for example, by submission of an Addendum to that Report) to reflect the current Conservation Objectives for the Southern North Sea SAC. This should include the revised findings in respect of the effects on site integrity of more than one UXO clearance event, piling event or combination of both in any 24 hour period. b) Could the Applicant clarify whether, in light of the above updates, it still considers there is a 	a) No comment b) No comment c) Please refer to NE Deadline 1 Appendix B1b d) No further comment	No further comment



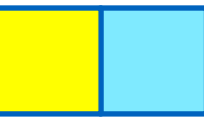
ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			<p>sound basis for the In-Principle Site Integrity Plan provisions at section 6.1, including that potentially more than one UXO detonation, piling event or combination of both could occur in any 24 hour period?</p> <p>c) Do Natural England, the MMO, The Wildlife Trusts or any other relevant party wish to comment on the Applicant's reasoning in Table 36 of [APP-036] for not limiting UXO detonations and piling events to a total of one in any 24 hour period?</p> <p>Could all relevant parties please also ensure that the status of discussions on this issue is covered within the SoCGs requested for Deadline 1.</p>		
1.2.28	The Wildlife Trusts	1	<p>2 Disturbance of Harbour Porpoise from UXO Detonation and Piling: 20% Threshold</p> <p>Following Natural England's [RR-059], the Applicant notes in [AS-036] that its Information to Support Appropriate Assessment Report [APP-043] does not reflect the updated Conservation Objectives for the Southern North Sea SAC insofar as they state that disturbance of harbour porpoise will not exceed '20% of the relevant area of the site in any given day'. The Applicant accepts that two events of either UXO clearance or piling (or a combination of both) in a single day would exceed the 20% limit for the winter area only, with no exceedance for the summer area.</p> <p>d) Please could the Applicant update the relevant sections of its Information to Support Appropriate Assessment Report [APP-043] (for example, by submission of an Addendum to that Report) to reflect the current Conservation Objectives for the Southern North Sea SAC. This should include the revised findings in respect of the effects on site integrity of more than one UXO clearance event, piling event or combination of both in any 24 hour period.</p> <p>e) Could the Applicant clarify whether, in light of the above updates, it still considers there is a sound basis for the In-Principle Site Integrity Plan provisions at section 6.1, including that potentially more than one UXO detonation, piling event or combination of both could occur in any 24 hour period?</p> <p>f) Do Natural England, the MMO, The Wildlife Trusts or any other relevant party wish to comment on the Applicant's reasoning in Table 36 of [APP-036] for not limiting UXO detonations and piling events to a total of one in any 24 hour period?</p> <p>Could all relevant parties please also ensure that</p>	<p>TWT agrees with Natural England's suggestion in their relevant representation [RR-059] that piling activities and UXO detonations should be limited to 1 on any given day, to ensure that 20% threshold of the Southern North Sea SAC is not exceeded. The Applicant should clarify their definition of a 24 hour period in each case, as this could affect the 20% threshold.</p>	<p>Please refer to point 001 on the Applicant's comments on the TWT's WR in the Applicant's Comments on Written Representations Volume 2 Technical Stakeholders (document reference ExA.WR_2.D2.V1) submitted at Deadline 2.</p>



ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			the status of discussions on this issue is covered within the SoCGs requested for Deadline 1.		
1.2.28	Marine Management Organisation	1	<p>2 Disturbance of Harbour Porpoise from UXO Detonation and Piling: 20% Threshold</p> <p>Following Natural England's [RR-059], the Applicant notes in [AS-036] that its Information to Support Appropriate Assessment Report [APP-043] does not reflect the updated Conservation Objectives for the Southern North Sea SAC insofar as they state that disturbance of harbour porpoise will not exceed '20% of the relevant area of the site in any given day'. The Applicant accepts that two events of either UXO clearance or piling (or a combination of both) in a single day would exceed the 20% limit for the winter area only, with no exceedance for the summer area.</p> <p>a) Please could the Applicant update the relevant sections of its Information to Support Appropriate Assessment Report [APP-043] (for example, by submission of an Addendum to that Report) to reflect the current Conservation Objectives for the Southern North Sea SAC. This should include the revised findings in respect of the effects on site integrity of more than one UXO clearance event, piling event or combination of both in any 24 hour period.</p> <p>b) Could the Applicant clarify whether, in light of the above updates, it still considers there is a sound basis for the In-Principle Site Integrity Plan provisions at section 6.1, including that potentially more than one UXO detonation, piling event or combination of both could occur in any 24 hour period?</p> <p>c) Do Natural England, the MMO, The Wildlife Trusts or any other relevant party wish to comment on the Applicant's reasoning in Table 36 of [APP-036] for not limiting UXO detonations and piling events to a total of one in any 24 hour period?</p> <p>d) Could all relevant parties please also ensure that the status of discussions on this issue is covered within the SoCGs requested for Deadline 1.</p>	<p>c). The MMO defers comment to Natural England on this matter, but reiterate that appropriate conditions must be placed within the DML for the management of this activity in the event that UXO is included within the DML.</p> <p>d). The MMO are content that the Statement of Common Ground (SoCG) reflects the discussion regarding this issue. The MMO understands that the applicant intends to submit the contemporary SoCG at Deadline 1.</p>	<p>(c) See Applicants response to MMO's answer to this point at 1.2.26 above.</p> <p>(d) No further comment</p>
1.2.30	Natural England	1	<p>2 Restrictions on Concurrent UXO Detonation and Piling: Security</p> <p>The ExA notes the Applicant's points at Table 36 of [AS-036] in response to Natural England's requests for security in the DMLs to limit UXO detonations and piling events to a total of one in any 24 hour period.</p> <p>Do Natural England, the MMO, The Wildlife Trusts or</p>	Please refer to NE Deadline 1 response Appendix B1b.	No further comment



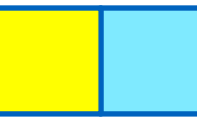
ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			any other relevant party wish to comment on the Applicant's reasoning in Table 36 of [APP-036] that Site Integrity Plans, agreed post-consent in accordance with the In-Principle SIP, are an appropriate mechanism to manage this matter? If not, why not?		
1.2.30	The Wildlife Trusts	1	<p>2 Restrictions on Concurrent UXO Detonation and Piling: Security</p> <p>The ExA notes the Applicant's points at Table 36 of [AS-036] in response to Natural England's requests for security in the DMLs to limit UXO detonations and piling events to a total of one in any 24 hour period.</p> <p>Do Natural England, the MMO, The Wildlife Trusts or any other relevant party wish to comment on the Applicant's reasoning in Table 36 of [APP-036] that Site Integrity Plans, agreed post-consent in accordance with the In-Principle SIP, are an appropriate mechanism to manage this matter? If not, why not?</p>	TWT would welcome Natural England's view on this matter.	No further comments.
1.2.30	Marine Management Organisation	1	<p>2 Restrictions on Concurrent UXO Detonation and Piling: Security</p> <p>The ExA notes the Applicant's points at Table 36 of [AS-036] in response to Natural England's requests for security in the DMLs to limit UXO detonations and piling events to a total of one in any 24 hour period.</p> <ul style="list-style-type: none"> Do Natural England, the MMO, The Wildlife Trusts or any other relevant party wish to comment on the Applicant's reasoning in Table 36 of [APP-036] that Site Integrity Plans, agreed post-consent in accordance with the In-Principle SIP, are an appropriate mechanism to manage this matter? If not, why not? 	The MMO agrees with the Applicant's reasoning that Site Integrity Plans are an appropriate mechanism to manage the matter of piling. As aforementioned the MMO has a preference for UXO detonation to be determined under a separate Marine Licence, but in the event that it is included in the DML, the MMO are content that a SIP is appropriate.	No further comment
1.2.31	Natural England	1	<p>2 Concurrent Piling at East Anglia ONE North and East Anglia TWO</p> <p>The In-Principle Site Integrity Plan [APP-594] states at bullet four of section 6.1 that '(t)here would be no concurrent piling or UXO detonation between the proposed East Anglia ONE North and East Anglia TWO projects if both projects are constructed at the same time'. However, it does not appear to limit the overall number of piling or UXO detonation events that could potentially occur within any 24 hour period across the two projects.</p> <p>a) Do Natural England, the MMO, The Wildlife Trusts and the Applicant consider</p>	<p>a) Please refer to NE Deadline 1 response Appendix B1b</p> <p>b) Please refer NE Deadline 1 response Appendix B1b and G1b</p> <p>c) No comment from NE</p>	No further comment



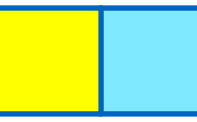
ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			<p>that it should? Please given reasons for your position.</p> <p>b) Could Natural England please explain why it considers in [RR-059] that a DML condition would be a more appropriate way to secure the particular mitigation commitments relating to concurrent piling between the East Anglia ONE North and East Anglia TWO projects?</p> <p>Whilst noting the Applicant's response at Table 45 of [AS-036], could it please respond specifically to Natural England's suggestion that a 'Co-operation Plan / Agreement' is required to be secured via DML condition for both projects to manage and mitigate underwater noise from piling and UXO activities in the event that construction periods for the two projects overlap?</p>		
1.2.31	The Wildlife Trusts	1	<p>2 Concurrent Piling at East Anglia ONE North and East Anglia TWO</p> <p>The In-Principle Site Integrity Plan [APP-594] states at bullet four of section 6.1 that '(t)here would be no concurrent piling or UXO detonation between the proposed East Anglia ONE North and East Anglia TWO projects if both projects are constructed at the same time'. However, it does not appear to limit the overall number of piling or UXO detonation events that could potentially occur within any 24 hour period across the two projects.</p> <p>c) Do Natural England, the MMO, The Wildlife Trusts and the Applicant consider that it should? Please given reasons for your position.</p> <p>d) Could Natural England please explain why it considers in [RR-059] that a DML condition would be a more appropriate way to secure the particular mitigation commitments relating to concurrent piling between the East Anglia ONE North and East Anglia TWO projects?</p> <p>Whilst noting the Applicant's response at Table 45 of [AS-036], could it please respond specifically to Natural England's suggestion that a 'Co-operation Plan / Agreement' is required to be secured via DML condition for both projects to manage and mitigate underwater noise from piling and UXO activities in the event that construction periods for the two projects overlap?</p>	<p>TWT has been assured by the Applicant that EA1N and EA2 will not be constructed at the same time but TWT highlights that careful planning/scheduling of underwater noise will be required if one project is undertaking UXO clearance whilst the other is undertaking piling activity. TWT agrees with Natural England's suggestion in their relevant representation [RR-059] that piling activities and UXO detonations should be limited to 1 on any given day across the two projects, to ensure that 20% threshold of the Southern North Sea SAC is not exceeded.</p>	<p>Please refer to point 001 of the Applicant's comments on the TWT's WR in the Applicant's Comments on Written Representations Volume 2 Technical Stakeholders (document reference ExA.WR_2.D2.V1) submitted at Deadline 2.</p> <p>To clarify, the Applicants have not comitted to not constructing the Projects at the same time. Rather, the Applicants have committed to no concurrent piling either within an individual Project or between the Projects, as detailed with the HRA Addendum submitted at Deadline 1 (REP1-038).</p>



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1.2.31	Marine Management Organisation	1	<p>2 Concurrent Piling at East Anglia ONE North and East Anglia TWO</p> <p>The In-Principle Site Integrity Plan [APP-594] states at bullet four of section 6.1 that '(t)here would be no concurrent piling or UXO detonation between the proposed East Anglia ONE North and East Anglia TWO projects if both projects are constructed at the same time'. However, it does not appear to limit the overall number of piling or UXO detonation events that could potentially occur within any 24 hour period across the two projects.</p> <p>e) Do Natural England, the MMO, The Wildlife Trusts and the Applicant consider that it should? Please given reasons for your position.</p> <p>f) Could Natural England please explain why it considers in [RR-059] that a DML condition would be a more appropriate way to secure the particular mitigation commitments relating to concurrent piling between the East Anglia ONE North and East Anglia TWO projects?</p> <p>g) Whilst noting the Applicant's response at Table 45 of [AS-036], could it please respond specifically to Natural England's suggestion that a 'Co-operation Plan / Agreement' is required to be secured via DML condition for both projects to manage and mitigate underwater noise from piling and UXO activities in the event that construction periods for the two projects overlap?</p>	<p>a). The MMO advise that noise disturbance within an SAC from a plan/project, individually or in combination, is considered to be significant if it excludes harbour porpoises from more than 20% of the relevant area of the site on any given day, or an average of 10% of the relevant area of the site over a season. The MMO consider that if more than one piling event or UXO detonation exceeds this threshold, then it is reasonable for the In-Principle Site Integrity Plan to limit the overall number of piling or UXO detonation events that could potentially occur within a 24-hour period across the two projects.</p>	No further comment
1.2.32	Natural England	1	<p>2 Harbour Porpoise of the Southern North Sea SAC: Assessment of Effects - SNCB Advice</p> <p>In their RR [RR-091], The Wildlife Trusts express disagreement with the SNCB's advice in relation to underwater noise management in the Southern North Sea SAC and the approach to assessment of impacts on harbour porpoise populations.</p> <ul style="list-style-type: none"> Please could Natural England respond to the concerns raised by The Wildlife Trusts in this regard, specifically statements that: <ul style="list-style-type: none"> The science underpinning the advice on underwater noise management is weak and the proposed approach will be difficult to deliver; and, A site-based assessment based on an estimate population number for the Southern North Sea SAC is required, rather than an assessment on the North Sea Management Unit? 	<p>The science and evidence used to underpin the SNCB advice on managing noise in harbour porpoise SACs, including why we consider it most appropriate to undertake assessments at the Management Unit scale, can be found in the short document 'JNCC (2020). Background to the advice on noise management within harbour porpoise SACs in England, Wales and Northern Ireland.' JNCC Report No. 653, JNCC, Peterborough, ISSN 0963- 8091, which is available here https://data.jncc.gov.uk/data/2e60a9a0-4366-4971-9327-2bc409e09784/JNCC-Report-653-FINAL-WEB.pdf</p>	No further comment



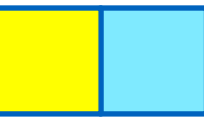
ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
1.2.33	Natural England	1	2 Commercial Fishing in Cumulative and In-Combination Marine Mammal Assessments The Wildlife Trusts [RR-091] make the case that commercial fishing activities should be included in cumulative and in-combination assessments as opposed to the Applicant's approach of including them as a part of the environmental baseline for the marine mammals assessment. The Wildlife Trusts refer to the Waddenzee judgement and judicial review proceedings in relation to the Dogger Bank SAC. The Applicant's response refers to the approach taken in the draft HRA for the BEIS Review of Consents and by other consented or planned offshore wind farms. <ul style="list-style-type: none"> Does Natural England consider that the Applicant's approach of including commercial fishing in the environmental baseline is sound in this case? Please explain the reasoning behind your position. 	When assessing the effects of a plan or project it is a requirement of the Habitats Directive that consideration is given to whether those effects are likely to be significant either individually or in combination with other plans or projects. In seeking to avoid deterioration and to properly assess the likely effects of a plan or project it is appropriate to take account of the prevailing factors acting on the site to the extent that they are capable of influencing the conservation objectives for the site. Where there is ongoing fishing activity on the site, it is appropriate to consider the effects of the plan or project that is the subject of the assessment in the context of those prevailing conditions, of which fishing impact may be one.	No further comment
1.2.36	Natural England	1	2 Marine Mammals: In-Principle Site Integrity Plan - Certainty Under the provisions of the dDCO, the future SIP(s) must accord with the principles set out in the In-Principle SIP (IPSIP), which is to be a certified document under Art 36. The submitted IPSIP [APP-594] appears to indicate (for example at Table 2.1) that the document itself would continue to be revised and updated following the grant of DCO consent. a) If the IPSIP is necessary to ensure the avoidance of Adverse Effects on Integrity of the designated features of the Southern North Sea SAC, does the scope for review and change to the IPSIP post-DCO consent provide sufficient certainty that it can be relied upon for its intended purpose in the DCO consenting process? b) In [APP-036] the Applicant refers to a statement in Table 2.1 of [APP- 594] that '(a) alongside the in-principle SIP for UXO clearance an implementation plan and any monitoring requirements will also be drafted for any required measures'. Could the Applicant please expand on this statement? - What would be the function of the implementation plan relative to the IPSIP/SIP? Is it envisaged that this would be within the scope of the material to be submitted to and approved in writing by the MMO under the relevant DML conditions?	a) Yes, Natural England considers that when the SIP is revisited post consent and prior to construction, the HRA will need to be updated. Therefore any changes to existing mitigation methods or new/additional mitigation measures can be implemented prior to construction commencing. b) No comment from NE.	No further comment



ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
1.2.36	The Wildlife Trusts	1	2 Marine Mammals: In-Principle Site Integrity Plan - Certainty Under the provisions of the dDCO, the future SIP(s) must accord with the principles set out in the In-Principle SIP (IPSIP), which is to be a certified document under Art 36. The submitted IPSIP [APP-594] appears to indicate (for example at Table 2.1) that the document itself would continue to be revised and updated following the grant of DCO consent. <ul style="list-style-type: none"> a) If the IPSIP is necessary to ensure the avoidance of Adverse Effects on Integrity of the designated features of the Southern North Sea SAC, does the scope for review and change to the IPSIP post-DCO consent provide sufficient certainty that it can be relied upon for its intended purpose in the DCO consenting process? b) In [APP-036] the Applicant refers to a statement in Table 2.1 of [APP- 594] that '(a)longside the in-principle SIP for UXO clearance an implementation plan and any monitoring requirements will also be drafted for any required measures'. Could the Applicant please expand on this statement? <ul style="list-style-type: none"> - What would be the function of the implementation plan relative to the IPSIP/SIP? - Is it envisaged that this would be within the scope of the material to be submitted to and approved in writing by the MMO under the relevant DML conditions? 	<p>As part of the SoCG, TWT have asked for the inclusion of the Final Investment Decision (FID) and Contract for Difference (CfD) across all SIPs prepared by the offshore wind industry [TW-015]. This is to ensure that decisions made at these milestones do not limit the mitigation required to ensure no adverse effect. Monitoring requirements also need to be taken into account in relation to these milestones. The inclusion of FID and CfD milestones in the in-principle SIP is currently under consideration by the Applicant.</p> <p>TWT support the principle of a SIP, however it is not possible to agree no adverse effect due to the lack of strategic management and mechanisms for tackling underwater noise on a North Sea level</p>	Please refer to point 005 of the Applicant's comments on the TWT's WR in the Applicant's Comments on Written Representations Volume 2 Technical Stakeholders (document reference ExA.WR_2.D2.V1) submitted at Deadline 2. submitted at Deadline 2 regarding FID.
1.2.36	Marine Management Organisation	1	2 Marine Mammals: In-Principle Site Integrity Plan - Certainty Under the provisions of the dDCO, the future SIP(s) must accord with the principles set out in the In-Principle SIP (IPSIP), which is to be a certified document under Art 36. The submitted IPSIP [APP-594] appears to indicate (for example at Table 2.1) that the document itself would continue to be revised and updated following the grant of DCO consent. <ul style="list-style-type: none"> a) If the IPSIP is necessary to ensure the avoidance of Adverse Effects on Integrity of the designated features of the Southern North Sea SAC, does the scope for review and change to the IPSIP post-DCO consent provide sufficient certainty that it can be relied upon for its intended purpose in the DCO consenting process? b) In [APP-036] the Applicant refers to a statement in Table 2.1 of [APP- 594] that '(a)longside the in-principle SIP for UXO clearance an implementation plan and any monitoring requirements will also be drafted 	<p>b). The MMO understands that the purpose of the IPSIP is to set out the approach to deliver potential mitigation measures for the project. The MMO is of the opinion that the IPSIP should not be revised as it is a set of principles. The SIP, which is expected to include any detailed mitigation measures, must accord with the principles set out in the IPSIP, and so any changed to the IPSIP are required to be reflected here. The MMO will seek further clarification from the Applicant as to any proposed changes in approach as set out in the IPSIP.</p>	(a) The Applicants agree with the MMO response and have clarified their position in response to this question submitted at Deadline 1 (REP1-107)



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			<p>for any required measures'. Could the Applicant please expand on this statement?</p> <ul style="list-style-type: none"> - What would be the function of the implementation plan relative to the IPSIP/SIP? - Is it envisaged that this would be within the scope of the material to be submitted to and approved in writing by the MMO under the relevant DML conditions? 		
1.2.37	Natural England	1	<p>2 In-Principle Site Integrity Plan – Potential Mitigation Measures</p> <p>The Applicant notes that the In-Principle SIP needs to retain a level of flexibility until the extent and nature of mitigation becomes clear, and that finalised SIPs must, under the conditions of the DMLs be approved by the MMO prior to construction</p> <ul style="list-style-type: none"> a) In this context, do the MMO, Natural England and The Wildlife Trusts consider that the draft In-Principle Site Integrity Plan provides sufficient detail on potential mitigation measures? b) If not, what additional information should be included to provide sufficient detail? <p>How does the Applicant respond to The Wildlife Trusts' request for underwater noise modelling at this stage to demonstrate the degree of noise reduction which could be achieved through mitigation?</p>	<p>a) NE is satisfied that the draft IPSIP provides sufficient detail at this time and will enable the consideration of advances in mitigation methods and technology between consent and when the review of the SIP is undertaken. However, we maintain our position with regards to securing essential mitigation to ensure no adverse effect on integrity. Please see NE Deadline 1 response Appendix B1b.</p> <p>b) No comment from NE</p> <p>c) No comment from NE</p>	No further comment
1.2.37	The Wildlife Trusts	1	<p>2 In-Principle Site Integrity Plan – Potential Mitigation Measures</p> <p>The Applicant notes that the In-Principle SIP needs to retain a level of flexibility until the extent and nature of mitigation becomes clear, and that finalised SIPs must, under the conditions of the DMLs be approved by the MMO prior to construction</p> <ul style="list-style-type: none"> a) In this context, do the MMO, Natural England and The Wildlife Trusts consider that the draft In-Principle Site Integrity Plan provides sufficient detail on potential mitigation measures? b) If not, what additional information should be included to provide sufficient detail? c) How does the Applicant respond to The Wildlife Trusts' request for underwater noise modelling at this stage to demonstrate the degree of noise reduction which could be achieved through mitigation? 	<p>a) It is recognised that the In-principle SIP needs some level of flexibility prior to consent, however it would be helpful for the In-principle SIP to provide more detail on the potential effectiveness of the mitigation measures mentioned. TWT welcomes their inclusion as a consultee on the Draft MMMP and the In-principle SIP, and we welcome the opportunity to work with the applicant to discuss the implementation of mitigation and monitoring further.</p> <p>TWT still have some concerns on the industry's approach to the in-combination mitigation and emphasise that a regulatory mechanism and monitoring programme will be essential to increase our confidence [See Question 1.2.46. for more detail].</p> <p>b) As part of the CoCG, TWT have asked for the inclusion of the Final Investment Decision (FID) and Contract for Difference (CfD) across all SIPs prepared by the offshore wind industry [TW-015]. This is to ensure that decisions made at these milestones do not limit the mitigation required to ensure no adverse effect. Monitoring requirements also need to be taken into account in relation to these milestones. The inclusion of FID and CfD milestones in the in-principle SIP is currently under consideration by the Applicant.</p>	<p>a) Please refer to point 003 of the Applicant's comments on the TWT's WR in the Applicant's Comments on Written Representations Volume 2 Technical Stakeholders (document reference ExA.WR_2.D2.V1) submitted at Deadline 2 regarding efficacy of mitigation measures and indicative timetable for engagement on the final SIP. Please see the MMO's response to WQ 1.2.39 (a), with respect to comments regarding a regulatory mechanism to manage in-combination impacts.</p> <p>b) Please refer to point 004 of the Applicant's comments on the TWT's WR in the Applicant's Comments on Written Representations Volume 2 Technical Stakeholders (document reference ExA.WR_2.D2.V1) submitted at Deadline 2. regarding FID.</p>



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1.2.37	Marine Management Organisation	1	2 In-Principle Site Integrity Plan – Potential Mitigation Measures The Applicant notes that the In-Principle SIP needs to retain a level of flexibility until the extent and nature of mitigation becomes clear, and that finalised SIPs must, under the conditions of the DMLs be approved by the MMO prior to construction a) In this context, do the MMO, Natural England and The Wildlife Trusts consider that the draft In-Principle Site Integrity Plan provides sufficient detail on potential mitigation measures? b) If not, what additional information should be included to provide sufficient detail? c) How does the Applicant respond to The Wildlife Trusts' request for underwater noise modelling at this stage to demonstrate the degree of noise reduction which could be achieved through mitigation?	The MMO defers to Natural England as to whether the IPSIP provides sufficient detail on potential mitigation measures. The MMO expects any detailed mitigation measures to be included in any post consent SIP and Marine Mammal Mitigation Protocol (MMMP).	No further comment
1.2.38	Marine Management Organisation	1	2 In-Principle Site Integrity Plans – MMO/BEIS Advice The ExA notes the MMO's statement that the Department of Business, Energy and Industrial Strategy (BEIS) and MMO intend to provide further advice about the content of In-Principle SIPs for harbour porpoise SACs. <ul style="list-style-type: none"> Can the MMO provide an estimate as to when this advice is expected to be available? Will it be within the timescales of this Examination? 	As part of the Southern North Sea (SNS) Regulators forum, the MMO and BEIS are encouraging collaboration within and between sectors (ie Renewables, Oil & Gas) to work together so as to avoid in combination noise activities, in particular during the sensitive summer period. As part of this an online tool is being developed where developers from all sectors can set out proposed noisy activities and timings, and so avoid in combination effects with other projects. The MMO cannot at this time confirm timescales for delivery of this or any other advice on noise management within SNS SAC. The MMO also notes that the Guidance for assessing the significance of noise disturbance against Conservation Objectives of harbour porpoise SACs JNCC Report no.654, May 2020, is now available. The document sets out guidance, including daily and seasonal noise thresholds.	MMO online noise activity tool The Applicants welcome the development of the online tool. Following formal release of the tool and instructions on its use, the Applicants anticipate contribution to the tool in the pre-construction period once timings of noisy activities are established and use of the tool in preparation of relevant future documents such as the Site Integrity Plan (SIP). JNCC Guidance (submitted on 11th June AS-045) The Applicants have used this guidance when preparing the HRA addendum submitted at Deadline 1 (REP1-038) and other relevant materials such as the In-Principle SIP (to be updated and resubmitted at Deadline 3) and in due course the final Southern North Sea SIP.
1.2.39	Marine Management Organisation	1	2 Site Integrity Plans – Mechanisms for Coordination Natural England and The Wildlife Trusts state that they do not consider it possible to conclude that there would be no Adverse Effect on Integrity of the Southern North Sea SAC due to the absence of a regulatory mechanism to manage, monitor and review multiple Site Integrity Plans across a range of offshore wind farm projects. This concern relates to the potential for in- combination underwater noise impacts affecting harbour porpoise populations. a) Can the MMO provide any reassurance in	a). The MMO has imposed the requirement for Site Integrity Plans (SIPs) on to several projects following a review of consents within the Southern North Sea SAC in conjunction with Department for Business Energy and Industrial Strategy (BEIS). On receipt of the Southern North Sea SIP the MMO will assess the activities proposed for their impacts alone, and in-combination with other plans and projects, with the relevant SNCB. The MMO, alongside BEIS, is encouraging cross industry working which will be considered when assessing the SIP.	(a) No further comment (b) No further comment



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			<p>respect of how multiple SIPs will be managed, monitored and reviewed to avoid adverse effects on the integrity of the Southern North Sea SAC?</p> <p>b) The Applicant refers in [AS-036] to SIPs already in place for other consented projects. Is the MMO able to offer any emerging evidence from practice in those cases which may assist in providing reassurance that SIP coordination is capable of being managed successfully?</p>	<p>b). To date the MMO received one SIP for a consented project. This was managed according to the terms set out above in consultation with the Natural England as the relevant SNCB. The MMO is developing the monitoring practices for the SIP and would like to assure the ExA that this will be reviewed with due diligence. This MMO is in conversation the Southern North Sea Regulators Working Group to ensure that this can be managed, and will provide details once it becomes available.</p>	
1.2.41	The Wildlife Trusts	1	<p>SIP and MMMP - Post-Consent Approvals</p> <p>The Applicant states in [AS-036] that it has agreed through the SoCG process that it will consult The Wildlife Trusts in respect of the Site Integrity Plans and Marine Mammal Mitigation Protocols for Unexploded Ordnance (UXO) clearance and piling. A SoCG between the Applicant and The Wildlife Trusts has not yet been submitted to this Examination.</p> <p>a) Do The Wildlife Trusts consider that this addresses their comments in [RR-091] on post-consent engagement?</p> <p>b) Could the Applicant please ensure that this is included in the SoCG requested for Deadline 1 and confirm whether and how this will require a change to relevant DCO / DML wording?</p>	<p>We welcome the fact that the Applicant has now agreed to update the Draft MMMP and the In-principle SIP to include TWT as a consultee [TW - 016]. TWT will assess our satisfaction when we see the updated Draft MMMP and the In-principle SIP at Deadline 3.</p>	<p>The Applicants have no further comments.</p>
1.2.42	Marine Management Organisation	1	<p>Marine Mammal Mitigation Protocol – Permanent Threshold Shift Range</p> <ul style="list-style-type: none"> Please could the MMO respond to the Applicant's explanation (in Table 29 of [AS-036]) as to why it considers single strike sound exposure level (SELss) to be appropriate for the assessment of noise from UXO detonations and therefore used as the basis of proposed mitigation? 	<p>The MMO are of the opinion that a (UXO) detonation is classed as an impulsive noise source; impulsive sources produce sounds that are typically transient, brief (less than 1 second), broadband, and consist of high peak sound pressure with rapid rise time and rapid decay (NMFS, 2018).</p> <p>There are various metrics that can be used to measure an impulsive noise source, including the single strike sound exposure level (SELss) and the peak Sound Pressure Level (SPLpeak). The SELss metric is a measure of the total noise energy produced from a single noise event and is the integration of all the acoustic energy contained within the event. The SPLpeak metric is a measure of the maximum instantaneous sound pressure from a particular event. If the MMO consider the recommended marine mammal noise exposure criteria, e.g. NMFS (2018), dual criteria are provided for impulsive sources: the weighted cumulative sound exposure level (SELcum) and the SPLpeak. "The instantaneous SPLpeak level has also been chosen as part of the NMFS' dual metric thresholds for impulsive sounds. Auditory weighting is not considered appropriate with the SPLpeak metric, as direct mechanical damage associated with sounds having high peak sound pressures typically does not strictly reflect the frequencies an individual species hears best..." (NMFS, 2018). When applying dual metric thresholds for impulsive sounds, one should use whichever results in the largest isopleth for calculating PTS onset.</p> <p>The MMO consider that the SPLpeak is the most appropriate metric to apply for the assessment of instantaneous auditory injury, e.g. Permanent Threshold Shift (PTS). This is because the risk of auditory damage depends on how high</p>	<p>Consideration of mitigation options for a maximum impact range for PTS of up to 11.1km using SPLpeak criteria will be included in the updated draft MMMP to be submitted at Deadline 3.</p>



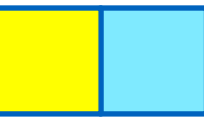
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				<p>peak pressures get (and how rapidly they rise), which – out of the standard metrics available – is best reflected by the SPLpeak. Because this PTS is physical damage to the inner ear, it is less dependent on the sensitivity of hearing across frequency, which is why it isn't weighted. Furthermore, the Popper et al. (2014) criteria for fish provide quantitative thresholds for explosions based on the SPLpeak only for mortality and potential mortal injury.</p> <p>The MMO conclude that mitigation plans and proposed mitigation measures should consider the maximum predicted impacts ranges, which are likely to be the SPLpeak predictions. UXO detonations give large effect zones for PTS because they can generate very high peak Sound Pressure Levels.</p> <p>The MMO is happy engage in dialogue with the applicant to address these considerations.</p>	
1.2.43	Marine Management Organisation	1	<p>2 Marine Mammal Mitigation Protocol: Point of Clarification</p> <p>The draft DMLs [APP-023] require that a final Marine Mammal Mitigation Protocol (MMMP) is approved prior to construction in respect of UXO clearance and piling activities associated with both the generation and transmission assets for each project. The submitted draft MMMP [APP-591] appears to indicate that separate MMMPs may be produced, at least in relation to piling and UXO clearance.</p> <p>a) Can the Applicant clarify what is the maximum number of Marine Mammal Mitigation Protocols that may be produced for a single project under the provisions of the draft DMLs?</p> <p>b) in the event that there would be more than one final MMMP, is there a need for coordination of their provisions?</p>	<p>The MMO consider that in the event that more than one final MMMP is produced then there would be a need to coordinate their provisions. The MMO defer further comment on this matter to Natural England.</p>	No further comment
1.2.44	Natural England	1	<p>2 Construction Monitoring: Cessation of Piling Condition</p> <p>The Applicant states in Table 29 of [AS-036] that it does not consider it necessary to add provisions recommended by the MMO to the DML construction monitoring conditions which would require piling to cease if noise levels are significantly higher than those assessed in the ES, with recommencement dependent upon an updated MMMP and MMO agreement to further monitoring requirements.</p> <p>a) Does the Applicant maintain this position in light of the inclusion of similar conditions for recently consented projects such as at condition 19(3) and 14(3) of the Norfolk Vanguard DMLs?</p> <p>b) If so, please can the Applicant explain why the circumstances of the projects before us justify a different approach to that taken in the Norfolk Vanguard case?</p>	<p>Natural England supports the provisions recommended by MMO which would require piling to cease if noise levels are found to be significantly higher than those assessed in the environmental statement. We also note that this condition has already been applied to other projects and therefore we consider it a standard condition.</p>	<p>As stated previously, the Applicants do not consider the proposed text to be necessary within the DMLs as the MMO has the necessary enforcement powers under the Marine and Coastal Access Act 2009. The Applicants therefore do not consider that such a condition would meet the legal test of necessity as it duplicates statutory powers that already exist.</p>



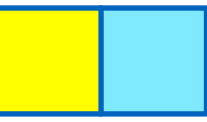
ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			c) Please could the MMO respond to the Applicant's statement that the necessary enforcement powers already exist under the Marine and Coastal Access Act 2009?		
1.2.44	Marine Management Organisation	1	<p>2 Construction Monitoring: Cessation of Piling Condition</p> <p>The Applicant states in Table 29 of [AS-036] that it does not consider it necessary to add provisions recommended by the MMO to the DML construction monitoring conditions which would require piling to cease if noise levels are significantly higher than those assessed in the ES, with recommencement dependent upon an updated MMMP and MMO agreement to further monitoring requirements.</p> <p>a) Does the Applicant maintain this position in light of the inclusion of similar conditions for recently consented projects such as at condition 19(3) and 14(3) of the Norfolk Vanguard DMLs?</p> <p>b) If so, please can the Applicant explain why the circumstances of the projects before us justify a different approach to that taken in the Norfolk Vanguard case?</p> <p>c) Please could the MMO respond to the Applicant's statement that the necessary enforcement powers already exist under the Marine and Coastal Access Act 2009?</p>	c). The MMO does not see this as duplication. The MMO does not consider that the necessary enforcement powers exist under MCAA (2009). It is the MMO's view that the recommended provisions remain within the DML as the MMO do not agree that the enforcement powers under MCAA (2009) allow for a cessation of work in the same way the conditions would. Under MCAA (2009) the MMO could suspend or revoke the DML, however the MMO believe that this puts the project at risk of lengthy delay should an enforcement issue arise.	The Applicants do not agree and consider that the MMO has the requisite powers under the Marine and Coastal Access Act 2009 (for example, the MMO can issue a stop notice under section 102). As such, the Applicants do not consider the proposed text to be necessary within the DMLs and are of the view that such a condition would not meet the legal test of necessity as it duplicates statutory powers that already exist
1.2.45	Marine Management Organisation	1	<p>2 Post-Construction Monitoring Commitments for Marine Mammals</p> <p>In Table 29 of [AS-029] the Applicant suggests amended wording to DML conditions relating to post-construction monitoring to remove reference to a three-year timescale. The Applicant also states that it will set out details of timescales for post-construction monitoring in the In-Principle Monitoring Plan [APP-590].</p> <p>a) Does the MMO consider that these changes adequately address its concerns?</p> <p>b) Does the Applicant intend to submit an updated version of the In- Principle Monitoring Plan to this Examination?</p>	a). Yes, the MMO consider that these changes adequately address the concerns raised.	No further comments
1.2.46	Natural England	1	<p>2 Southern North Sea SAC: Adequacy of Monitoring Commitments</p> <p>Concerns have been expressed by The Wildlife Trusts about the monitoring secured in the dDCO in respect of harbour porpoise and the Southern North Sea SAC. The Offshore In Principle Monitoring Plan [APP-590] signposts to provision for monitoring (if required) in the Draft Marine Mammal Mitigation Protocol [APP-591] and In-Principle Site Integrity Plan [APP-594]. All three</p>	a) Discussions regarding marine mammal monitoring are ongoing and we will provide an update at a future deadline. b) No comment from NE c) No comment from NE	No further comment



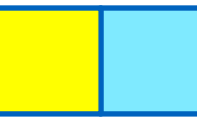
ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			<p>are to be certified documents under Art 36 of the DCO.</p> <ul style="list-style-type: none"> a) Do the MMO and Natural England consider that the monitoring provisions included in the draft DMLs and subsidiary plans and protocols are fit for purpose in respect of marine mammals? b) Do The Wildlife Trusts wish to comment on the Applicant's response to its concern at line 011 of Table 66 in [AS-036]? c) What function do The Wildlife Trusts consider that any additional monitoring commitments would have and what form might they take? 		
1.2.46	The Wildlife Trusts	1	<p>2 Southern North Sea SAC: Adequacy of Monitoring Commitments</p> <p>Concerns have been expressed by The Wildlife Trusts about the monitoring secured in the dDCO in respect of harbour porpoise and the Southern North Sea SAC. The Offshore In Principle Monitoring Plan [APP-590] signposts to provision for monitoring (if required) in the Draft Marine Mammal Mitigation Protocol [APP-591] and In-Principle Site Integrity Plan [APP-594]. All three are to be certified documents under Art 36 of the DCO.</p> <ul style="list-style-type: none"> a) Do the MMO and Natural England consider that the monitoring provisions included in the draft DMLs and subsidiary plans and protocols are fit for purpose in respect of marine mammals? b) Do The Wildlife Trusts wish to comment on the Applicant's response to its concern at line 011 of Table 66 in [AS-036]? c) What function do The Wildlife Trusts consider that any additional monitoring commitments would have and what form might they take? 	<p>b) + c) It is recognised that the Applicant has included provision for further monitoring (if required) in the Draft Marine Mammal Mitigation Protocol and In-Principle Site Integrity Plan, and TWT welcomes their inclusion as a consultee on the Draft MMMP and the In-principle SIP, and the opportunity to work with the Applicant to discuss the implementation of mitigation and monitoring further.</p> <p>However, TWT still has concerns about the Industry's lack of approach to strategic monitoring. Without an industry-wide regulatory mechanism and monitoring programme TWT cannot have confidence in the effectiveness of in-combination noise mitigation or the impact of the offshore wind industry on the site integrity of the Southern North Sea SAC. Currently there will be no monitoring of harbour porpoise post construction. Pre, during and post construction monitoring is required of both noise levels and harbour porpoise activity to understand the impact of underwater noise on harbour porpoise as an EPS and on the Southern North Sea SAC.</p> <p>Without an appropriate regulatory mechanism in place, TWT cannot agree to no adverse effect on the Southern North Sea SAC for EA1N & 2 in combination with other identified projects.</p>	<p>a) Please refer to point 003 of the Applicant's comments on the TWT's WR in the Applicant's Comments on Written Representations Volume 2 Technical Stakeholders (document reference ExA.WR_2.D2.V1) submitted at Deadline 2 regarding efficacy of mitigation measures and indicative timetable for engagement on the final SIP. Please see the MMO's reponse to WQ 1.2.39 (a), with respect to comments regarding a regulatory mechanism to manage in-combination impacts.</p>
1.2.46	Marine Management Organisation	1	<p>2 Southern North Sea SAC: Adequacy of Monitoring Commitments</p> <p>Concerns have been expressed by The Wildlife Trusts about the monitoring secured in the dDCO in respect of harbour porpoise and the Southern North Sea SAC. The Offshore In Principle Monitoring Plan [APP-590] signposts to provision for monitoring (if required) in the Draft Marine Mammal Mitigation Protocol [APP-591] and In-Principle Site Integrity Plan [APP-594]. All three are to be certified documents under Art 36 of the DCO.</p> <ul style="list-style-type: none"> a) Do the MMO and Natural England consider that the monitoring provisions included in the draft DMLs and subsidiary plans and 	<p>a). At this stage, the MMO broadly agree that the monitoring provisions included in the draft DMLs are fit for purpose and reflect the monitoring requirements of similar projects within the Southern North Sea SAC. The MMO defer further comment on this point to a later deadline.</p>	<p>No further comment</p>



ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			<p>protocols are fit for purpose in respect of marine mammals?</p> <p>b) Do The Wildlife Trusts wish to comment on the Applicant's response to its concern at line 011 of Table 66 in [AS-036]?</p> <p>c) What function do The Wildlife Trusts consider that any additional monitoring commitments would have and what form might they take?</p>		
1.2 Biodiversity, Ecology and Natural Environment (including Habitats Regulations Assessment (HRA))					
Benthic Ecology					
1.2.48	Natural England	1	2	<p>HRA screening (EA2) Document 5.3.4 [APP-047] at page 44 states Natural England is content with the screening of sites with respect to marine mammals, but there is no equivalent statement with respect to other features of the marine environment, or the overall screening exercise. The screening exercise is not raised in Natural England's RR [RR-059]. Is Natural England satisfied with the scope and conclusions of the Applicant's HRA screening as reported in [APP-044] and [APP-045] and does it agree that there are no issues arising in relation to benthic ecology?</p>	<p>Natural England can confirm that no designated site for benthic features will be impacted by either EA1N or EA2. However, the DCO limits contain supporting habitats to the Outer Thames Estuary SPA and Southern North Sea SAC. In addition there is the Coraline Cragg feature which should be avoided.</p> <p>AS-042 considers potential impacts on supporting features of the Outer Thames Estuary SPA. Following receipt of updated mapping from Natural England, this is being updated with further consideration of the SPA supporting habitats and will be resubmitted at Deadline 3.</p> <p>The Coraline Cragg feature will be avoided and the Applicants are considering a punch out exclusion zone which encompasses the Coraline Cragg to secure this. Further information will be provided at Deadline 3.</p>
1.2.49	MMO	1	2	<p>HRA Screening (EA2) Can the Applicant please respond to comments made by the MMO in its RR [RR-052] regarding benthic ecology and comment on how these may affect the conclusions drawn in the screening exercise? (The MMO is asked to comment on responses at Deadline 2.)</p>	<p>The MMO reserves comment until Deadline 2, as requested by the ExA.</p> <p>No further comment</p>
1.2.50	MMO	1	2	<p>Micro-siting: benthic habitats Is the MMO [RR-052] content that the dDCO and DML are adequately drafted to ensure micro-siting to reduce or avoid impacts on valuable benthic habitats? Does anything else need to be provided for?</p>	<p>The MMO note that 17(1) and 13 (1) of the draft DML makes provision for a design plan to be submitted to the MMO prior to the commencement of activities, and activities must not commence until the design plan has been approved by the MMO. This includes any exclusion zones/environmental micro-siting requirements. The MMO will consult the relevant SNCB regarding this plan. At present the MMO consider that micro-siting, and if required any exclusion zones, should be sufficient to avoid or, where avoidance is not possible, reduce impacts to benthic habitats. The MMO understand the applicant will be submitting a plan at this deadline to deal with reef, and so the MMO defer further comment until such time as the plan has been reviewed.</p> <p>No further comment</p>
1.2.50	Natural England	1	2	<p>Micro-siting: benthic habitats Is the MMO [RR-052] content that the dDCO and DML are adequately drafted to ensure micro-siting to reduce or avoid impacts on valuable benthic habitats? Does anything else need to be provided for?</p>	<p>Natural England notes that the Applicant intends to submit an Outline <i>Sabellaria spinulosa</i> reef Management Plan at Deadline 1 so NE will provide further advice at Deadline 2 or 3.</p> <p>No further comment</p>
1.2 Biodiversity, Ecology and Natural Environment (including Habitats Regulations Assessment (HRA))					



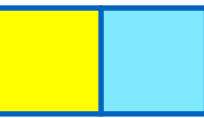
ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
Fish and shellfish ecology					
1.2.52	Natural England	1	2 HRA screening (EA2) Document 5.3.4 [APP-047] at page 44 states Natural England is content with the screening of sites with respect to marine mammals, but there is no equivalent statement with respect to other features of the marine environment, or the overall screening exercise. The screening exercise is not raised in Natural England's RR [RR-059]. Is Natural England satisfied with the scope and conclusions of the Applicant's HRA screening as reported in [APP-044] and [APP-045] and does it agree that there are no issues arising in relation to fish and shellfish ecology?	Natural England can confirm that we are satisfied with the marine environment HRA screening and conclusions and agree that there are no other Annex I or II designated site features significantly impacted by the proposals which haven't already be highlighted in our RR-059. We can confirm that there are no HRA issues for fish and shellfish.	This is reflected in the SoCG with Natural England (REP1-035)
1.2.53	The Wildlife Trusts	1	2 In-combination Assessments: Inclusion of Fishing In [RR-091] The Wildlife Trusts raise a concern that fishing should be included in all cumulative and in-combination assessments. The Applicant responds to this position in [AS-036] (Comments on Relevant Representations - Volume 3: Technical Stakeholders). Are The Wildlife Trusts content with the explanation provided there? If not, please describe your outstanding concerns and set out the action that you consider the Applicant needs to take.	<p>TWT is aware that that applicant has agreed with Natural England at an Expert Topic Group (ETG) Meeting on the 6th of March 2018, that fishing activity will be considered as part of the baseline. However, TWT's position has not changed: TWT believes that commercial fisheries should be included in the CIA.</p> <p>Commercial fishing is a licensable ongoing activity that has the potential to have an adverse impact on the marine environment. This is supported in the leading case C-127/02 Waddenzee [2004] ECR I-7405, the CJEU held at para. 6. In addition, Defra policy requires existing and potential fishing operations to be managed in line with Article 6 of the Habitats Directive.</p> <p>This approach further supports that fishing is considered a plan or a project and therefore must be included in the in-combination assessment in line with Article 6(3) of the Habitats Directive. Following the commencement of judicial review proceedings by TWT against Dogger Bank Offshore Wind farms, TWT was given assurances that fishing would be included in future offshore wind farm assessments. We have raised this issue with the Planning Inspectorate over several planning applications (Hornsea 3, Norfolk Vanguard, Norfolk Boreas) and have also raised the issue with Defra and BEIS. We make this case for all MPAs assessed in this application. This position [TWT-005] is marked as "Not Agreed" in the SoCG.</p>	b) Please refer to point 006 of the Applicant's comments on the TWT's WR in the Applicant's Comments on Written Representations Volume 2 Technical Stakeholders (document reference ExA.WR_2.D2.V1) submitted at Deadline 2 regarding fishing activity being included as part of the baseline.
1.2 Biodiversity, Ecology and Natural Environment (including Habitats Regulations Assessment (HRA))					
Terrestrial Ecology					
1.2.55	Natural England	1	2 EMP As drafted, the DCO would allow individual EMPs to be brought forward for each stage of the transmission and grid connection work (onshore) under R11. Does the OLEMS provide a robust framework within which each of these separate EMPs could be produced?	This is under discussion with the Applicant and we will respond at a future deadline	No further comment
1.2.55	ESC/SCC	1	2 EMP As drafted, the DCO would allow individual EMPs to be brought forward for each stage of the transmission and grid connection work (onshore) under R11. Does the OLEMS provide a robust framework within which each of these separate EMPs could be produced?	<p><i>ESC Lead Authority</i></p> <p>The OLEMS provides an adequately comprehensive framework for the required Ecological Management Plans (EMP). The OLEMS describes the mitigation measures embedded within the projects and, at a high level, the additional mitigation measures which may be required in relation to each ecological</p>	No further comment



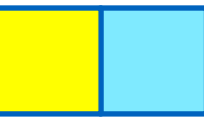
ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
				receptor. As identified in the OLEMS these additional mitigation measures will need to be informed by up to date pre-construction surveys ahead of the finalisation and approval of any EMPs. We consider that this is an appropriate approach as it will mean that additional mitigation measures will be able to be deployed where they are required based on the most up to date ecological survey information.	
1.2.56	Natural England	1	2 Schedule of Mitigation, R21 and EMP The Schedule of Mitigation [APP-575] repeatedly refers to adherence to the EMP as the mitigation but no draft EMP is provided. R21 requires the EMP to accord with the OLEMS. Are you satisfied that the OLEMS provides sufficient detail/certainty of specific mitigation measures and is there sufficient information for preparing future LMP(s)/EMP(s)?	Natural England is aware that an outline EMP will be provided by the Applicant and are in discussions with the applicant about ensuring that we are a consultee under R21. This matter is ongoing.	An outline EMP is provided within Section 10 of the OLEMS (APP-584). This document details the specific mitigation measures that have been identified based on the results of the surveys undertaken to date.
1.2.56	ESC/SCC	1	2 Schedule of Mitigation, R21 and EMP The Schedule of Mitigation [APP-575] repeatedly refers to adherence to the EMP as the mitigation but no draft EMP is provided. R21 requires the EMP to accord with the OLEMS. Are you satisfied that the OLEMS provides sufficient detail/certainty of specific mitigation measures and is there sufficient information for preparing future LMP(s)/EMP(s)?	<i>ESC Lead Authority</i> The OLEMS adequately describes the mitigation measures which are currently considered likely to be required based on the findings presented in the ESs, with the exception of those described for bats, hedgerows, woodlands and trees (please see 1.2.76 below for more detail). As recognised in the OLEMS there will need to be a number of pre-construction ecological surveys undertaken to refine and confirm the necessary mitigation measures for each construction section, these will be necessary ahead of the finalisation of the relevant EMPs to ensure the required mitigation is deployed in the required location based on up to date evidence.	Noted.
1.2.59	Natural England	1	2 Pre-construction surveys A number of pre-construction ecological surveys are proposed prior to the production of the EMP(s). a) How are the pre-construction surveys secured? b) Should they be individually listed in R21?	After review of requirement 21 Natural England considers that the pre-construction surveys are not secured. It is our opinion that the surveys should be secured through the wording of Requirement 21 and that individual monitoring should be conducted. We will work with the Applicant to secure this.	The Applicants do not consider it appropriate or necessary to list the species for which pre-construction surveys are required within the wording of Requirement 21. See the Applicants response to this question submitted at Deadline 1 (REP-107).
1.2.59	ESC/SCC	1	2 Pre-construction surveys A number of pre-construction ecological surveys are proposed prior to the production of the EMP(s). a) How are the pre-construction surveys secured? b) Should they be individually listed in R21?	<i>ESC Lead Authority</i> The pre-construction surveys currently identified as required are set out in the OLEMS. The requirement to undertake pre- construction survey is currently secured by Requirement 21 requiring the production of EMPs which are to be in accordance with the OLEMS. Whilst it is not considered necessary for the pre-construction surveys to be individually listed in Requirement 21, we do consider that Requirement 21 should explicitly make reference to the need for them. As currently drafted, we consider that the requirement gives greater weight to EMPs being based on the findings of the surveys which informed the ESs, rather than pre-commencement surveys which would be more up to date. This could lead to the EMPs being drafted based on out of date evidence, which could in turn lead to delays in discharging the requirement.	The Applicants consider that the OLEMS (APP-584) presents the appropriate mechanism for securing pre-construction surveys. The Applicants will submit an updated OLEMS (APP-584) to the Examinations at Deadline 3 with a list of species for which pre-construction surveys will be undertaken. The Applicants note that the final Ecological Management Plan secured by Requirement 21 of the draft DCO (APP-023) will be informed by the results of the pre-construction surveys. The Applicants will amend the wording of Requirement 21 to reflect this (as



ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2	
					per the SoCG with the Councils (REP1-072)) and will submit an updated draft DCO (APP-023) to the Examinations at Deadline 3.	
1.2.61	ESC/SCC	1	2	<p>Biodiversity Net Gain and enhancement</p> <p>SCC and ESC have raised concerns regarding the lack of commitment to biodiversity and net gain. Whilst noting that DEFRA has confirmed that Net Gain is not applicable to NSIPs in the UK Government's' draft Environment Bill, paragraph 5.3.4 of NPS EN-1 states that the Applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.</p> <p>a) Please could the Applicant provide an explanation of how they consider the application has taken advantage of enhancing biodiversity?</p> <p>b) Please could Natural England/ESC/SCC/Suffolk Wildlife Trust give a reasoned response on whether they consider the project accords with paragraph 5.3.4 of NPS EN-1.</p> <p>Please can you ensure that matters pertaining to biodiversity enhancement are included in the SoCGs</p>	<p><i>ESC Lead Authority</i></p> <p>Response to b)</p> <p>Paragraph 5.3.4 of EN-1 requires that "<i>The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests</i>". The Councils do not consider that the projects have fully taken advantage of the opportunities to enhance biodiversity. Whilst proposals at the substations include a landscape planting scheme, the primary purpose of this landscaping is to mitigate landscape and visual impacts and it has not been demonstrated that the ecological enhancement opportunities have been maximised. Within the landfall and cable route parts of the projects, whilst it is understood that there are fewer opportunities to deliver ecological enhancement, some opportunities (such as reinforcement planting of existing hedgerows) do exist and these have not been explored (except where they relate to mitigating potential landscape and visual impacts). At present therefore, the Councils do not consider that the projects comply with 5.3.4 of EN-1.</p> <p>As part of the Statement of Common Ground (SoCG) process the Councils remain in discussion with the Applicants on the ecological enhancements that could be delivered by the developments.</p>	<p>Whilst the Applicants note that the proposed landscape planting is primarily to mitigate landscape and visual effects, it is considered that the direct ecological enhancement this delivers should also be recognised. The Applicants have submitted an Ecological Enhancement Clarification Note to the Examinations at Deadline 1 (REP1-035), which demonstrates the biodiversity units created through the proposed landscape scheme.</p> <p>The Applicants note the phraseology of paragraph 5.3.4 of EN-1, specifically that "<i>The applicant should show how the project has taken advantage of opportunities...</i>". EN-1 does not require the Applicants to '<i>have fully taken advantage of the opportunities...</i>' as the Councils are inferring. The Applicants therefore consider they have sufficiently demonstrated how the Projects will deliver ecological enhancement opportunities through the OLEMS (APP-584), the Outline SPA Crossing Method Statement submitted to the Examinations at Deadline 1 (REP1-043) and in Appendix 4 Ecological Mitigation Works to the Applicants' Responses to Examining Authority's Written Questions Volume 4 submitted to the Examinations at Deadline 1 (REP1-088).</p> <p>The Applicants will continue to engage with the Councils in relation to this matter through the SoCG process.</p>
1.2.61	Natural England	1	2	<p>Biodiversity Net Gain and enhancement</p> <p>SCC and ESC have raised concerns regarding the lack of commitment to biodiversity and net gain. Whilst noting that DEFRA has confirmed that Net Gain is not applicable to NSIPs in the UK Government's' draft Environment Bill, paragraph 5.3.4 of NPS EN-1 states that the Applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.</p> <p>c) Please could the Applicant provide an explanation of how they consider the</p>	<p>Natural England notes reference to paragraph 5.3.4 of EN-1; it is our view that this para. refers to general conservation and enhancement of all biodiversity incl. protected sites and species. It would be helpful if the ExA could please provide further clarification on what they are seeking advice on as depending on the response our answer could be wide ranging.</p> <p>In order to be as helpful as possible on this matter if wider biodiversity outside of designated site features and protected species, which would be subject to Biodiversity Net Gain considerations, then we advise that the Applicant/the decision maker must give consideration to the potential impacts on these as required by the NPS EN – 1 (e.g. paras 5.3.13 – 5.3.17 on pp. 71- 72). Re conservation, this should include assessment of impacts against the current</p>	<p>The Applicants submitted an Ecological Enhancement Clarification Note at Deadline 1 (REP1-035) which details ecological enhancement proposals.</p>



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			<p>application has taken advantage of enhancing biodiversity? d) Please could Natural England/ESC/SCC/Suffolk Wildlife Trust give a reasoned response on whether they consider the project accords with paragraph 5.3.4 of NPS EN-1.</p> <p>Please can you ensure that matters pertaining to biodiversity enhancement are included in the SoCGs</p>	<p>baseline and consideration of any necessary mitigation/compensation for these habitats and species within the ES.</p>	
1.2.62	Natural England	1	<p>Monitoring Can Natural England please confirm that they are content with the Applicant's response in point 25 of Table 37 in [AS-036] with regards to grasslands and hedgerows monitoring?</p>	<p>Natural England notes that discussion on this issue is ongoing and will be progressed through the SoCG process Please see Deadline 1 response Appendix C1b.</p>	<p>No further comment</p>
1.2.67	Natural England	1	<p>Hundred River crossing The Hundred River feeds into the Sandlings SPA. Is there any risk that works at the crossing could impact on the qualifying features of the SPA?</p>	<p>Please see our Deadline 1 Appendix C1b and Our Risks and Issues Log Appendix I1b. Impacts to the Hundred River from open cut trenching is flagged as an outstanding concern, especially in relation to potential impacts to the Sandlings SPA feature, which we currently do not believe has been adequately assessed.</p>	<p>The Applicants are preparing further (outline) information on the method for watercourse crossings to provide assurance to NE regarding the measures to be implemented in order to minimise impacts upon the Hundred River. The Applicants will submit this Outline Watercourse Crossing Method Statement at Deadline 3.</p> <p>See the Applicants response to ExA question 1.2.66 which describes the constraints limiting the crossing of the Hundred River to an open-trench method.</p> <p>See the Applicants response to ExA question 1.2.67 describing potential indirect effects on the Sandlings SPA as a result of works at the Hundred River crossing.</p>



ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
1.2.70	ESC/SCC	1 2	<p>Bats</p> <p>ES Chapter 22 states as a worst case scenario it is assumed that the construction phase could result in approximately 11km of hedgerow being temporarily lost in the medium to long term (paragraph 196) which would represent an impact of at worst major adverse significance on bats. Please could you respond to the following points.</p> <ul style="list-style-type: none"> a) Proposed mitigation includes reinstatement post construction which may take 5-7 years to establish. Appendix 6.4 of the ES – Cumulative Project Description [APP-453] does not include a programme of works for the onshore cable route. If the projects are constructed sequentially could the Applicant please confirm the maximum duration that they would anticipate that the hedgerows would be removed before reinstatement begins? b) Can you confirm that this duration was assessed as part of the ES? c) Would there be any long term impacts on bat populations as a result of this duration? d) Please can you include the programme of works for the onshore cable route in the amended Cumulative Project Description requested in question 1.0.16. e) Can the Applicant please provide further information on why certain transects were chosen? Why was long covert excluded from transect 2 [APP-281]? f) Could the Applicant confirm if they intend to submit an outline hedgerow mitigation plan? g) Are Natural England/ESC/SCC/Suffolk Wildlife Trust satisfied that the reinstatement, management and maintenance of the replacement hedgerows is satisfactorily secured? Should this be contained within the LMP or EMP? h) Can the Applicant please confirm when an updated CIA with Sizewell in relation to bats will be submitted into the Examination? <p>Please can Natural England confirm that they are satisfied that Figure 22.7a-g [APP-280] clearly maps the roosting, foraging and commuting areas for bats in relation to the red line boundary?</p>	<p><i>ESC Lead Authority</i></p> <p>In response to the particular question posed to the Councils at (g):</p> <p>The OLEMS sets the requirement for the reinstatement of hedgerows removed during construction and also requires the submission of a “<i>detailed scheme of hedge planting aftercare</i>” prior to commencement. The OLEMS is a certified document in the draft DCOs. Requirements 14 and 21 require the LMP and EMP to accord with the OLEMS. The inclusion of hedgerow replanting and aftercare detail within the LMP and EMP relevant to each construction section is sensible to ensure that all ecological mitigation requirements are detailed in the same document(s). This scheme should also detail the length of the aftercare period which should be a minimum of five years for the cable route and landfall.</p> <p>The Councils have requested that the Applicants commit to an adaptive maintenance and aftercare period within Requirement 15 and the OLEMS in relation to the mitigation planting proposed at the substations site which includes hedgerow planting.</p> <p>Additional construction measures, to mitigate for the gaps created in hedgerows during construction and which will be present in the early reinstatement period, are currently being discussed with the Applicants via the SoCG process.</p> <p>The Councils are satisfied that the reinstatement hedgerow planting is adequately secured through both the LMP and EMP by virtue of the commitments within the OLEMS subject to amendments in the OLEMS to commit to adaptive aftercare and maintenance for the mitigation planting at the substations site.</p>	<p>The Applicants will consider the changes requested by the Councils and will submit an updated OLEMS (APP-584) to the Examinations at Deadline 3, which will reflect the status of discussions on landscape management with the Councils.</p>



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1.2.70	Natural England	1 2	<p>Bats</p> <p>ES Chapter 22 states as a worst case scenario it is assumed that the construction phase could result in approximately 11km of hedgerow being temporarily lost in the medium to long term (paragraph 196) which would represent an impact of at worst major adverse significance on bats. Please could you respond to the following points.</p> <p>a) Proposed mitigation includes reinstatement post construction which may take 5-7 years to establish. Appendix 6.4 of the ES – Cumulative Project Description [APP-453] does not include a programme of works for the onshore cable route. If the projects are constructed sequentially could the Applicant please confirm the maximum duration that they would anticipate that the hedgerows would be removed before reinstatement begins?</p> <p>b) Can you confirm that this duration was assessed as part of the ES?</p> <p>c) Would there be any long term impacts on bat populations as a result of this duration?</p> <p>d) Please can you include the programme of works for the onshore cable route in the amended Cumulative Project Description requested in question 1.0.16.</p> <p>e) Can the Applicant please provide further information on why certain transects were chosen? Why was long covert excluded from transect 2 [APP-281]?</p> <p>f) Could the Applicant confirm if they intend to submit an outline hedgerow mitigation plan?</p> <p>g) Are Natural England/ESC/SCC/Suffolk Wildlife Trust satisfied that the reinstatement, management and maintenance of the replacement hedgerows is satisfactorily secured? Should this be contained within the LMP or EMP?</p> <p>h) Can the Applicant please confirm when an updated CIA with Sizewell in relation to bats will be submitted into the Examination?</p> <p>Please can Natural England confirm that they are satisfied that Figure 22.7a-g [APP-280] clearly maps the roosting, foraging and commuting areas for bats in relation to the red line boundary?</p>	<p>a) Please see NE Deadline 1 Appendix C1b Point 15.</p> <p>g) While the important hedgerows and trees preservation order plan is a certified document; Natural England can find no condition or requirement ensuring it will be followed. Natural England would therefore question how such reinstatement could be enforced.</p>	<p>(a) See the Applicants response to this point within their response to the ExA's written questions (REP1-107).</p> <p>(g) The Applicants note that measures regarding the reinstatement, management and maintenance of hedgerows are set out within section 5.3 of the OLEMS (APP-584). The final Ecological Management Plan secured by Requirement 21 of the draft DCO (APP-023) must be prepared in accordance with the OLEMS (APP-584) and be approved by the relevant planning authority in consultation with the relevant statutory nature conservation body (Natural England) prior to the commencement of onshore works.</p>
1.2.74	ESC/SCC	1 2	<p>Arboricultural Method Statement (AMS)</p> <p>The Schedule of Mitigation [APP-575] states at ref 5.4 that woodland planting would be implemented through the LMP and AMS. Are you satisfied that this is sufficiently secured? Should this be in the LMP or EMP? Is there sufficient information in the OLEMs to satisfy that an AMS</p>	<p><i>ESC Lead Authority</i></p> <p>Details of new woodland planting should be set out in both the LMP and EMP as both documents serve different purposes. As the woodland planting is to compensate the loss of existing woodland, it must fulfil both landscape and ecological functions and therefore inclusion in both Management Plans should help ensure that it is designed, implemented and managed to achieve both of</p>	<p>The Applicants have noted the Councils response and will ensure that woodland planting is addressed in both the final LMP and EMP. An AMS is secured by Requirement 21 of the draft DCO (APP-023) and will be prepared post-consent in</p>



ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			will do its job?	<p>these requirements.</p> <p>An Arboricultural Method Statement (AMS) is considered necessary in relation to all tree removals together with tree protection measures during the course of all construction activity. Providing the AMS will be submitted and carried out in accordance with BS5837: 2012 the Councils accept the AMS will provide sufficient protection.</p>	<p>accordance with BS5837:2012 (or the relevant current standards at the time of writing). The final AMS will be submitted to the relevant planning authority for approval prior to the commencement of any stage of the onshore works.</p>
1.2.75	ESC/SCC	1 2	<p>Growth rate Please expand on your concerns regarding planting growth rates.</p>	<p><i>ESC Lead Authority</i></p> <p>The Applicants' landscape and visual impact mitigation strategy is reliant on predicted growth rates for new tree planting, that may well not be possible given the local weather conditions. The evidence behind the predicted growth rates appears to be based on non-current weather patterns and UK national averages for new tree planting.</p> <p>The described growth rates are based on an Institute of Environmental Management and Assessment (IEMA) article titled 'Predicting the Growth of Trees and Hedge Planting when Determining the Effectiveness of Mitigation' and understood to be dated 2019. From this article the Applicants seem to be relying on predicted <i>national average</i> growth rates for newly planted mitigation planting. Being averages, it logically follows that within the range of growth rates recorded across the country, some must have been higher than average (where growing conditions are particularly favourable such as in the West Country or Welsh Marches), and others must have been below average (where growing conditions are limiting such as East Anglia). It is well established that East Anglia has some of the lowest rainfall amounts in the UK, and soils towards the coast tend to be light and free draining. Given that the Applicants are relying on a national average figure, and that East Suffolk clearly is below average ideal growing conditions, it seems highly likely that the predicted growth rates will not be achieved.</p> <p>Further details of the Councils' response to this issue is given in the LIR Paras 15.22-15.26 and Appendix 3 of the LIR.</p> <p>We continue to engage with the Applicants to develop an approach of adaptive aftercare, based on the approach used for the restoration of minerals sites, which will seek to place a robust system in place to deal with failing or unsatisfactory planting.</p>	<p>As set out in section 3.5.4 of the OLEMS (APP-584), assumed growth rates are based on relevant guidance from the IEMA, research of relevant published literature and plant nurseries, and are comparable to precedents established by other NSIPs.</p> <p>The Applicants held ETG meetings in which growth rates were discussed with the local planning authority (Table 3.1 of the OLEMS (APP-584)). Section 3.5.4 of the OLEMS (APP-584) provides information on the assumed growth rates of trees utilised for landscaping.</p> <p>The Applicants highlight that the growth rates of landscape planting adopted for the assessment presented in the ES were lowered following the Preliminary Environmental Impact Report in response to the Councils' Section 42 consultation response, as referred to in Table 29.1, Appendix 29.1 (APP-565).</p> <p>The Applicants will consider the changes requested by the Councils and will submit an updated OLEMS (APP-584) to the Examinations at Deadline 3, which will reflect the status of discussions on landscape management with the Councils.</p>
1.2.75	SASES	1 2	<p>Growth rate Please expand on your concerns regarding planting growth rates.</p>	<p>SASES questions the assumptions made about growth rates for trees and hedges. Please refer to expert report from Jon Rose which forms part of SASES WR Landscape & Visual Impact</p>	<p>As set out in section 3.5.4 of the OLEMS (APP-584), assumed growth rates are based on relevant guidance from the IEMA, research of relevant published literature and plant nurseries, and are comparable to precedents established by other NSIPs.</p> <p>The Applicants held ETG meetings in which growth rates were discussed with the local planning authority (Table 3.1 of the OLEMS (APP-584)). Section 3.5.4 of the OLEMS (APP-584) provides information on the</p>



ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
					<p>assumed growth rates of trees utilised for landscaping.</p> <p>The Applicants highlight that the growth rates of landscape planting adopted for the assessment presented in the ES were lowered following the Preliminary Environmental Impact Report in response to the Councils Section 42 consultation response, as referred to in Table 29.1, Appendix 29.1 (APP-565).</p> <p>The Applicants' note SASES expert report and will respond at Deadline 4.</p>
1.2.76	ESC/SCC	1 2	<p>Ecological receptors</p> <p>Please expand on your concerns [RR-002 and RR-007] that there are some ecological receptors which are either not considered to have been fully assessed or have insufficient mitigation/compensation measures identified within the ESs and secured in the dDCO.</p>	<p><i>ESC Lead Authority</i></p> <p>The Councils consider that the construction impacts on bats, hedgerows, woodlands and trees and the construction-related impacts on air quality (in the context of designated sites) and the operational noise impacts have not been fully assessed in the ESs.</p> <p>For bats, ES Chapter 22 identifies that the loss of habitat suitable for bat foraging and commuting (primarily hedgerows and areas of woodland) would result in a "moderate adverse" impact on this receptor in the "short term" after mitigation measures have been applied (22.6.1.9.3). The Councils are concerned that the duration of the impact has been under assessed. If the proposed replacement planting does not proceed as planned or does not develop as quickly as anticipated (see our comments above in response to Q1.2.75) a minimum of a "medium term" impact will occur. This could result in greater impacts on local bat populations as the length of the works and lack of mitigation/compensation will have potentially resulted in less food availability (e.g. by severance of connections to feeding areas) which in turn will result in poorer breeding success and population declines. However, since the publication of the ESs the Applicants have engaged with the Councils through the SoCG process to further explore these concerns and identify additional mitigation measures that could be implemented during the construction and early reinstatement phases to help address these impacts. This includes the proposed use of hurdles installed within the newly created hedgerow gaps to provide mitigation for the loss of connectivity which would occur. It is considered that this would help address commuting impacts on bats. Discussion is also underway regarding measures that could be implemented alongside the hurdles to lessen the impact on foraging bats. Further detail on this will be included in the SoCG and final designs could form part of the relevant EMPs.</p> <p>With regard to hedgerows, woodland and trees our concern relates to the proposed growth rates set out in the ESs. As described in our response to Q1.2.75, we consider that these growth rates are overly ambitious given local climatic conditions and therefore the replanted hedgerows, woodland and trees will not provide the same ecological function as those being lost as quickly as presented in the ESs. Where possible earlier planting could help to address this concern, however this is not possible in all locations (such as where planting is for reinstatement following construction). In locations where planting is for reinstatement, the additional measures described above could</p>	<p>The Applicants note that the Councils' representation on this matter stems from the disagreement on the landscape planting growth rates adopted for the assessment.</p> <p>The Applicants refer to their response to Q1.2.70 in Volume 4 Applicants' Responses to WQ1 1.2 Biodiversity Ecology and Natural Environment (REP-107) submitted at Deadline 1, which clarifies the duration of impact that was considered when assessing the overall significance of potential impacts to foraging and commuting bats arising from the construction of the Projects.</p> <p>The Applicants highlights that the growth rates of landscape planting adopted for the assessment presented in the ES were lowered following the Preliminary Environmental Impact Report in response to the Councils Section 42 consultation response, as referred to in Table 29.1, Appendix 29.1 (APP-565).</p> <p>The Applicants will consider the changes requested by the Councils and will submit an updated OLEMS (APP-584) to the Examinations at Deadline 3, which will reflect the status of discussions on landscape management with the Councils.</p> <p>With regard to air quality impacts, the Applicants have submitted an Onshore Ecology Clarification Note to the Examinations at Deadline 1, which provides further detail on air quality impacts to</p>



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				<p>help mitigate the impacts of hedgerow loss on species such as bats, however the Councils do not consider that there are any additional measures available which could address our concern in relation to how long it will take new planting to grow to a sufficient size that it will ecologically function in the same way as the existing vegetation.</p> <p>In addition, with regard to replacement woodland planting, the ESs propose that only "...at least an equivalent area of lost woodland is replanted..." (paragraph 22.6.1.4 190). Whilst this will provide compensation at a spatial scale, it will not deliver an equivalent quality of habitat, nor will it allow for the decline in habitat quality which will be experienced whilst new planting matures. The Councils have requested that the Applicants commit to an adaptive maintenance and aftercare scheme for the woodland planting. This would allow the aftercare period to be suspended if the woodland planting was not meeting set objectives. The Councils have also requested details of how the woodland will be secured long-term and details of its long-term management. It is considered that the OLEMS should be updated with this information. The Councils have also been engaging with the Applicants regarding the provision of additional offsite planting which could help to provide further tree planting.</p> <p>With regard to air quality impacts, whilst impacts from nitrogen deposition on designated sites are assessed in the ESs, it is not clear that impacts from acid deposition arising from NOx emissions from construction vehicles during construction have been fully assessed. The Applicants are currently preparing an air quality clarification note as part of the SoCG process to provide further information on the air quality studies undertaken to date, how these have informed the assessment of impacts on ecological receptors and whether any additional mitigation measures are required.</p> <p>With regard to noise impacts, the ESs conclude that operational noise will at worst result in a "Minor Adverse" ecological impact (paragraph 22.6.2.2 251). However, this appears to be based on assessment undertaken in relation to human noise receptors. Using the results of assessment for impacts on human receptors as a proxy for ecological impacts is not appropriate as high frequency noise is not directly assessed (as it is beyond the range of human hearing). This has significant ramifications for a range of ecological receptors, particularly bats which rely on echolocation (using high frequencies) for foraging, commuting and socialising. As part of the SoCG process the Applicants are currently reviewing the noise assessment in relation to ecological receptors.</p>	<p>ecological receptors. The Applicants note a quantitative assessment for Non-Road Mobile Machinery (NRMM) emissions is being prepared for submission at Deadline 3. The Applicants will provide an update at Deadline 3 should the outcomes of the quantitative NRMM emissions assessment change the conclusions presented within the Onshore Ecology Clarification Note submitted at Deadline 1.</p> <p>The Applicants have submitted an Ecological Enhancement Clarification Note to the Examinations at Deadline 1 (REP1-035), which demonstrates that there will be no net loss of biodiversity units for the Projects overall. Further details on the proposed ecological mitigation areas have been submitted to the Examinations at Deadline 1 in Appendix 4 Ecological Mitigation Works to the Applicants responses to the Examiners Written Questions (document reference REP1-088).</p> <p>Within the SoCG process with the Councils (REP1-072), the Applicants have committed to undertaking a review / assessment of the potential for impacts on sensitive ecological receptors (e.g. bats, birds) arising from predicted day-time and night-time operational noise levels at the onshore substations. This review / assessment will be submitted at Deadline 3.</p>
1.2.77	The Woodland Trust		<p>Grove Wood Can The Woodland Trust confirm that they are content with the Applicant's response in Table 53 in [AS-036]. Can the Applicant confirm if there is an AMS to provide to the Woodland Trust in order for them to assess whether veteran trees will be impacted by proposed works?</p>	<p>The Trust welcomes the applicant's commitment to providing Grove Wood with a 15m buffer zone as per Natural England's Standing Advice. We would however, like to advise that if any public rights of way are to be re-directed within the buffer zone, the root protection areas of the trees forming the ancient woodland boundary should be respected if construction is required.</p>	<p>The Applicants have noted The Woodland Trusts advice. As per the Permanent Stopping up of Public Rights of Way Plan (APP-014), the Applicants note that a permanent public right of way diversion is proposed to be re-routed to run parallel to the boundary of Grove Wood on the opposite side of Grove Road.</p>
1.2.79	ESC/SCC		<p>Noise Please can you confirm what assessments you would expect to see in relation to the impact of noise on ecological receptors? [RR-002] and [RR- 007]</p>	<p><i>ESC Lead Authority</i></p> <p>The assessment of ecological impacts arising from operational noise presented in the ESs was based on assessment using human receptors and thresholds.</p>	<p>As noted in the Draft SoCG: East Suffolk Council and Suffolk Council submitted to the Examinations at Deadline 1 (REP-072), the Applicants have committed to submitting a</p>



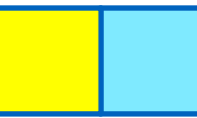
ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2	
				The assessment of noise on ecological receptors should identify potentially vulnerable ecological receptors; identify whether they will be subject to noise levels in the range which is likely to result in impacts (for bats it will be necessary to consider whether any high frequency noises will be generated which could impact on foraging and commuting behaviours); assess the significance of any impacts identified and identify any mitigation measures necessary to reduce identified impacts to acceptable levels.	review / assessment of the potential for impacts on sensitive ecological receptors (e.g. bats, birds) arising from predicted day-time and night-time operational noise levels at the onshore substations to the Examinations at Deadline 3.	
1.2 Biodiversity, Ecology and Natural Environment (including Habitats Regulations Assessment (HRA))						
Onshore Ornithology						
1.2.85	Natural England	1	2	<p>Sandlings SPA crossing Please respond to the following:</p> <p>a) Whilst noting that open cut trenching is not your preferred option for the SPA crossing, please comment on the Applicant's explanation that open cut trenching would have less of an impact than HDD. Are you confident that there is sufficient certainty and security for the proposed mitigation relied upon by the Applicant in this scenario?</p> <p>b) Do you consider the need for any further mitigation beyond that already set out by the Applicant?</p>	Please see NE Deadline 1 Appendix C2 (Outline SPA Crossing Method Statement).	The Applicants refer to their response to NE's Deadline 1 Appendix C2, within the Applicants' Comments on Natural England's Deadline 1 Submissions (document reference ExA.AS-10.D2.V1).
1.2.90	Natural England	1	2	<p>Seasonal restrictions In point 1 of Table 37 [AS-036] the Applicant has confirmed that the seasonal restriction proposed by the Applicant applies only to works associated with crossing the SPA and works associated with crossing the SPA within 200m of the SPA.</p> <p>Please can you set out your reasons for advising that all cable line construction works in the boundary, or within 200m of the Sandlings SPA and Lesiton to Aldeburgh SSSI is undertaken outside the breeding bird season. Do you consider that the Applicant's response on this point is capable of having acceptable impacts on the SPA?</p>	Please see our Deadline 1 response Appendix C1b, C2, I1b and our Statement of Common Ground with the Applicant.	The Applicants refer to their response to NE's Deadline 1 Appendix C1b, C2 and I1b, within the Applicants' Comments on Natural England's Deadline 1 Submissions (document reference ExA.AS-10.D2.V1).
1.2.90	ESC/ SCC	1	2	<p>Seasonal restrictions In point 1 of Table 37 [AS-036] the Applicant has confirmed that the seasonal restriction proposed by the Applicant applies only to works associated with crossing the SPA and works associated with crossing the SPA within 200m of the SPA.</p> <ul style="list-style-type: none"> Please can you set out your reasons for advising that all cable line construction works in the boundary, or within 200m of the Sandlings SPA and Lesiton to Aldeburgh SSSI is undertaken outside the breeding bird season. Do you 	<p><i>ESC Lead Authority</i></p> <p>The Sandlings Special Protection Area (SPA) is designated for its breeding woodlark and nightjar interest. The section of the Leiston-Aldeburgh SSSI crossed by or adjacent to the cable route contains habitats suitable for breeding birds. Additionally, surveys undertaken to inform the ESs did not record any SPA citation species within the area proposed for the SPA crossing.</p> <p>Given the nature of the construction works proposed, the Councils consider that seasonal restrictions to ensure that works are undertaken outside of the bird breeding season are adequate to avoid unacceptable impacts on the SPA.</p> <p>With the exception of the landfall the boundaries of the Sandlings SPA and the Leiston to Aldeburgh Site of Special Scientific Interest (SSSI) are the same where the designated sites are close to or are crossed by the cable</p>	The Applicants have submitted an Outline SPA Crossing Method Statement to secure a seasonal restriction associated with the SPA crossing works to the Examinations at Deadline 1 (REP1-043).



ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			consider that the Applicant's response on this point is capable of having acceptable impacts on the SPA?	<p>route. As both designated sites have breeding birds as part of their interest features the comments on seasonal working restrictions apply to both.</p> <p>At the landfall, the only designation is the SSSI, but in this location the use of HDD will avoid impacts on habitats suitable for nesting birds which are citation features.</p>	
1.2.91	ESC/SCC	1 2	Landfall a) In light of the sensitivity of the inter-tidal area is sufficient information currently provided to secure the embedded mitigation of HDD at landfall?	<p><i>ESC Lead Authority</i></p> <p>Response to a):</p> <p>From an ecological impact perspective, the Councils consider that there is adequate information provided to secure Horizontal Directional Drilling (HDD) as the construction method at the landfall and therefore avoid any impacts on sensitive ecological receptors in this location. The Applicants have provided a draft Outline Landfall Construction Method Statement (OLCMS) which is satisfactory from an ecological perspective.</p> <p>From a coastal management perspective, at present the Councils do not have details of the HDD drill line, profiles, entry and break out locations. Full details of the Applicants' approach to management of vibration risk to the cliff stability is also not yet agreed. The Applicants have however provided the Councils with a draft OLCMS. This confirms the Landfall Construction Method Statement (LCMS) secured by Requirement 13 of the draft DCOs will require both outstanding design and construction method details in relation to the HDD drill line, profiles entry and break out locations to be submitted for approval.</p>	<p>The Applicants note that further details on the trenchless technique at the landfall will come at the detailed design stage and be provided in the final Landfall Construction Method Statement prepared post-consent in accordance with the Outline Landfall Construction Method Statement submitted to the Examinations at Deadline 1 (document reference ExA.AS-2.D1.V1) to discharge Requirement 13 of the draft DCO (APP-023).</p>
			b) Should the dDCO provide additional clarification/detail such as through the expansion of R13 to set out what should be included?	<p>Response to b)</p> <p>The Councils require the draft DCOs to be updated to include the OLCMS as a certified document. The Councils will then be satisfied that Requirement 13 will secure the necessary outstanding information and give ESC the necessary authority to ensure an outcome that meets the Council's objectives. If however, the OLCM is not certified into the DCOs, Requirement 13 will need to be updated to clearly identify the matters which will be included in the final LCMS.</p>	<p>The Applicants will include the Outline Landfall Construction Method Statement (REP1-042) as a certified document within the updated draft DCO (APP-023) to be submitted at Deadline 3. In addition, the text of Requirement 13 will be amended to require the final Landfall Construction Method Statement to be in accordance with the Outline Landfall Construction Method Statement.</p>
1.2.93	ESC/SCC	1 2	Nightingale The proposed mitigation for nightingale includes the creation of habitat somewhere where the onshore development area overlaps the SPA/SSSI. This is deferred to the EMP. Are you confident that such a suitable area can be found?	<p><i>ESC Lead Authority</i></p> <p>The Applicants, in consultation with Natural England (NE), ESC, SCC and the RSPB, have prepared a draft Method Statement for the SPA Crossing. This sets out the proposed mitigation measures for nightingale in this area which the Councils are satisfied with.</p>	Noted
1.2.93	NE	1 2	Nightingale The proposed mitigation for nightingale includes the creation of habitat somewhere where the onshore development area overlaps the SPA/SSSI. This is deferred to the EMP. Are you confident that such a suitable area can be found?	<p>Please see our advice on the draft Outline Sandlings Crossing method Statement NE Deadline 1 Appendix C3.</p>	<p>The Applicants submitted an Outline SPA Crossing Method Statement at Deadline 1 (REP1-043) with details of the mitigation associated with the SPA crossing works and will continue to engage with NE on this matter.</p>



ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2	
1.2.94	ESC/ SCC	1	2	<p>Marsh Warbler and Bewick's Swan ES Chapter 23 identifies pre-mitigation effects on Marsh Warbler and Bewick's Swan for disturbance during construction with mitigation secured through the BBPP. No outline BBPP has been provided. Are you satisfied that this is sufficiently secured?</p>	<p><i>ESC Lead Authority</i></p> <p>The information provided in the ESs identifies that only one Marsh Warbler territory was recorded within the survey area. Given the status of breeding Marsh Warbler within the country it is important that any impacts are adequately mitigated. The Councils consider that subject to the use of HDD at the landfall and construction being outside of the breeding bird season both in the Special Protection Area (SPA) and within 200m of it, both of which are committed to in the ESs, it is appropriate to secure final mitigation details through the Breeding Birds Protection Plan (BBPP) where they can be based on pre-construction survey results.</p> <p>With regard to Bewick's Swan, of the habitats within the red line boundary these are only likely to use arable land during the winter period. No Bewick's Swans were recorded within the red line boundary during the surveys which inform the ESs, although they were recorded in one location to the north of the cable route. Given the habitat types used by this species and the fact that there can be variation in this from year to year, the Councils consider that it is acceptable to defer details of any necessary mitigation measures for this species to the BBPP which will be based on up to date pre-construction surveys.</p> <p>The BBPP is secured by Requirement 21 of the draft DCOs and there is a section in the OLEMS (6.4) which provides an outline of what the final document will contain. The Councils are satisfied with the principle of the information provided in the OLEMS and do not consider that an outline BBPP is required.</p>	<p>Noted. The Applicants note that an Outline Breeding Bird Protection Plan (BBPP) has been provided with the Applications and is included as section 6.4 of the OLEMS (APP-584). The final BBPP will accord with the Outline BBPP.</p>
1.2.94	Natural England	1	2	<p>Marsh Warbler and Bewick's Swan ES Chapter 23 identifies pre-mitigation effects on Marsh Warbler and Bewick's Swan for disturbance during construction with mitigation secured through the BBPP. No outline BBPP has been provided. Are you satisfied that this is sufficiently secured?</p>	<p>Natural England understands that the Applicant intends to update the OLEMS (APP-584) to reflect measures in the Outline SPA Crossing Method Statement.</p> <p>We are content to provide further advice at that time.</p>	<p>No further comment</p>
1.2.95	Natural England	1	2	<p>Turtle Doves Do you consider that the compensatory measures for turtle doves provides at least an equivalent value of biodiversity to that which is being lost?</p>	<p>Please see our advice on the draft Outline Sandlings Crossing method Statement Deadline 1 response Appendix C3.</p>	<p>The Applicants submitted an Outline SPA Crossing Method Statement at Deadline 1 (REP1-043) with details of the turtle dove mitigation and will continue to engage with NE on this matter.</p>
1.2.95	ESC/ SCC	1	2	<p>Turtle Doves Do you consider that the compensatory measures for turtle doves provides at least an equivalent value of biodiversity to that which is being lost?</p>	<p><i>ESC Lead Authority</i></p> <p>As with Nightingale, the Applicants, in consultation with NE, ESC, SCC and the RSPB, have prepared a draft Method Statement for the SPA Crossing. This sets out updated proposed mitigation measures for Turtle Dove. The Councils are satisfied that the measures proposed will provide at least equivalent compensatory measures to those that will be lost during the construction period.</p> <p>The Outline SPA Crossing Method Statement should be certified into the draft DCOs and referenced either within Requirement 21 or in the OLEMS. This will ensure that mitigation in the outline method statement will be secured within the DCOs.</p>	<p>Noted. The Applicants will submit an updated draft DCO (APP-023) to the Examinations at Deadline 3.</p>



2.3 Draft Development Consent Order

ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2	
1.5 Draft Development Consent Order (dDCO)					
Articles (Art(s))					
1.5.5.	SCC, ESC	1 2	<p>Art 12 would enable the undertaker to seek approval for accesses to the highway, other than those listed in Schedule 5. Approval would be deemed to have been given if no decision were to be notified within 28 days.</p> <ul style="list-style-type: none"> Are you satisfied that 28 days is sufficient time for you to consider such requests fully and properly? 	<p>SCC Lead Authority - Highways</p> <p>Article 12 refers to stopping up of streets of approval of accesses. It is unclear if the Applicants will liaise with emergency services with regard to temporary closures or if the local highway authority is expected to do so. Applications for road closures currently require three months' notice https://www.suffolk.gov.uk/roads-and-transport/roadworks/apply-for-a-temporary-road-closure/</p> <p>Article 13: Technical approval of highway works is a more detailed process than planning approvals. The Local Highway Authority (LHA) does not have the resources necessary to technically approve details within 28 days. At least double this amount of time would be required.</p>	<p>The Applicants will discuss these matters with the Councils through the SoCG process.</p>
1.5.7	NNB Generation (SZC) Ltd	1 2	<p>In respect of powers being sought in order for the applicant to be able construct, operate and maintain the authorised project, are you content with the provision in Art 20 paragraph (5) authorising the applicant to transfer the power to acquire new rights or impose restrictions?</p>	<p>SZC Co. is content with the provisions in Article 20 paragraph 5.</p>	<p>No Further Comments.</p>
1.5.8	NNB Generation (SZC) Ltd	1 2	<p>Paragraph (5) of Art 21 disapplies Art 21 in respect of statutory undertakers and cites section 138 of the 2008 Act and Art 28 of the dDCO.</p> <p>Art 28 in turn cites Schedule 10 (protective provisions).</p> <ul style="list-style-type: none"> Are you satisfied that your interests are adequately protected? 	<p>SZC Co. will require protective provisions within each of the Development Consent Orders to ensure its interests are adequately protected. SZC Co. is continuing to engage with Scottish Power Renewables on this matter.</p>	<p>The Applicants are discussing the need for Protective Provisions with SZC.</p>

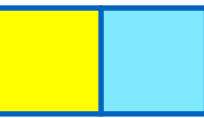


2.4 Electricity Connections, Infrastructure and Other Users

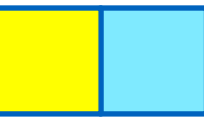
ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
1.6 Electricity Connections, infrastructure and Other Users				
1.6.1	National Grid System Operator	<p>1 2 NSIP Definition of the Authorised Development</p> <p>Schedule 1 paragraphs 1 and 2 of the dDCO [APP-023] describes the authorised development as two NSIPs:</p> <ul style="list-style-type: none"> A nationally significant infrastructure project as defined in sections 14 and 15 of the 2008 Act (the wind turbine generator array) with associated development to make all of the offshore and onshore grid connection works; and A nationally significant infrastructure project as defined in sections 14 and 16 (electric lines) (for the connection point and National Grid substation works). Work No. 41 is the National Grid substation itself. <p>a) Is there an anticipated point in the period to 2030 at which the proposed development that is the subject of the East Anglia ONE North and the East Anglia TWO applications could in aggregate cease to be the predominant users of Work No. 41?</p> <p>b) If additional grid connections were to be made at this location, what are the implications for Work No. 41 and any directly related works:</p> <ol style="list-style-type: none"> Will additional land be required; Will additional development (physical infrastructure be required); and If the responses to (i) and (ii) above are affirmative, can any clear projection be made as to the timing, extent and impact of these additional proposals? 	<p>b) (iii) NGENSO cannot comment on any unsigned connection agreements or any informal connection queries as this is commercially sensitive between the ESO and other parties. NGENSO publishes registers of all contracted connection offers on its website. This is updated weekly (see www.nationalgrideso.com/connections/registers-reports-and-guidance).</p>	No further comments
1.6.1	National Grid Electricity Transmission	<p>1 2 NSIP Definition of the Authorised Development</p> <p>Schedule 1 paragraphs 1 and 2 of the dDCO [APP-023] describes the authorised development as two NSIPs:</p> <ul style="list-style-type: none"> A nationally significant infrastructure project as defined in sections 14 and 15 of the 2008 Act (the wind turbine generator array) with associated development to make all of the offshore and onshore grid connection works; and A nationally significant infrastructure project as defined in sections 14 and 16 (electric 	<p>a) In relation to Work No. 41 EA1N and EA2 require two bays in total to provide a connection and that is all that is included in the promoter's DCO applications. See response to (b) below.</p> <p>b) (i) Yes, other connectees would require extensions to the National Grid substation (outside of Work No. 41 to provide additional bays) but these would need to be the subject of separate consents.</p> <p>(ii) Yes, additional bays as explained above.</p> <p>(iii) Any response relating to connection agreements is for NGENSO to provide.</p>	No further comments



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<p>lines) (for the connection point and National Grid substation works). Work No. 41 is the National Grid substation itself.</p> <p>a) Is there an anticipated point in the period to 2030 at which the proposed development that is the subject of the East Anglia ONE North and the East Anglia TWO applications could in aggregate cease to be the predominant users of Work No. 41?</p> <p>b) If additional grid connections were to be made at this location, what are the implications for Work No. 41 and any directly related works:</p> <p>iv. Will additional land be required;</p> <p>v. Will additional development (physical infrastructure be required); and</p> <p>If the responses to (i) and (ii) above are affirmative, can any clear projection be made as to the timing, extent and impact of these additional proposals?</p>		
1.6.2	National Grid Electricity Transmission	<p>1 2 NSIP Definition of the Authorised Development Are there circumstances in which the making of additional grid connections at Work No. 41:</p> <p>a) could result in Work No. 41 desirably becoming the subject matter of a distinct application for development consent, on the basis that it is no longer solely or even substantially required to connect the generating stations (Offshore Wind Farms) that are the subject of the East Anglia ONE North and East Anglia TWO applications; and</p> <p>b) might suggest that National Grid or a relevant subsidiary might more desirably or appropriately be the applicant for an NSIP primarily comprising Work No. 41 and relevant associated development?</p>	<p>a) and b) Substations themselves are not NSIPs and are generally consented via Town and Country Planning Applications, unless they are associated development to a NSIP. Work No. 41 only includes Works required to connect EA1N and EA2 and it is appropriate that such works are included in the promoter's DCO applications as associated development.</p>	No further comments
1.6.3	National Grid Electricity Transmission	<p>1 2 Operation and Further Development of Work No. 41 If Work No. 41 is constructed and becomes operational, subject to responses to ExQ1.0.17 – 18 and 1.6.1 & 2 above:</p> <p>a) will it be more accurate to characterise it as:</p> <p>i. a National Grid facility accommodating the generating station development proposed in these applications (the East Anglia ONE North and East Anglia</p>	<p>a) (i) As stated above, Work No 41 is required to connect EA1N and EA2 and it is therefore appropriate to characterise Work No 41 as a National Grid facility accommodating the generating station development proposed in these applications (the East Anglia ONE North and East Anglia TWO Offshore Wind Farms).</p> <p>b) Yes.</p> <p>c). N/A as the answer to b) is yes.</p>	No further comments



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<p>ii. TWO Offshore Wind Farms, or as a general purpose substation facility operating as a National Grid transmission asset, providing transmission connections for multiple users and purposes; and</p> <p>b) do the powers proposed to be provided by the dDCO [APP-023] and the description of development in the ES and the Works Plans provide sufficient scope to build and operate the facility that National Grid currently envisage?</p> <p>If the answer to (b) is no, does National Grid envisage there needing to be a further application or applications for development consent (or amendments to these development consents if granted) required to form and deliver the intended use and development of this facility?</p>		



2.5 Flood Risk, Water Quality and Resources

ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
1.7 Flood Risk, Water Quality and Resources				
1.7.1	EA	<p>1 2 Flood Risk Assessment (FRA)</p> <p>Can you confirm that you are satisfied with the Applicant's general approach to the Flood Risk Assessment (FRA); in your response, please address the following matters:</p> <ul style="list-style-type: none"> a) confirm that you are satisfied that the Applicant has applied appropriate climate change allowances to their assessment of flood risk; b) comment on SCC and ESC's view that "unless there is clear commitment to remove all impermeable areas of the proposed development by 2069 then a climate change allowance of 40% should have been factored into the assessment instead of 20%" (see Section 42 Consultation Response dated 27 March 2019 of Appendix 20.1 [APP-494]); c) comment on the appropriateness of the methods proposed for works on and/or near to Main Rivers located with the study area, including the Thorpeness Hundred River and Friston Watercourse; and d) comment on the adequacy and feasibility of the Applicant's proposed 'embedded' and residual mitigation measures detailed throughout the FRA [APP-496]. 	<ul style="list-style-type: none"> a) The Flood Risk Assessment (FRA) assessed the fluvial climate change impacts using the upper end allowance of 35% which is appropriate for development classified as 'essential infrastructure' with a lifetime of up to 2069. The proposed development has a stated lifetime of 25 years and an intended start date of 2023, resulting in a development lifetime until 2048. As such, we are satisfied that the fluvial climate change allowances are sufficient. The majority of the development, including the proposed onshore substation and National Grid infrastructure lie within Flood Zone 1. This is for both the present day scenario and with the addition of climate change allowances. The temporary works to cross the Hundred River watercourse will take place in Flood Zones 2 and 3, however the resulting permanent cable works will be underground, under the river, and therefore no longer at risk of flooding. Therefore there are no relevant climate change allowances to apply in this situation. b) The stated lifetime of the proposed development is 25 years, with an anticipated start date of 2023, and an expected lifetime until 2048. The climate change allowances presently used will be appropriate until 2069, which is 21 years beyond the stated lifetime. This provides an element of precaution should the development remain for longer than anticipated. However, it may be beneficial to assess the surface water flood risk and drainage scheme using the 40% allowance, to see what the resulting impacts would be. This would show whether the proposals would still be satisfactory, or whether the scheme would require alterations to ensure it did not increase flood risk elsewhere in this scenario. c) The works proposed for the Thorpeness Hundred River include the crossing of the river using an open cut method. This will include temporary damming of the watercourse and either over-pumping of the water or temporary re-routing, to ensure that the original flow volumes and rates are maintained so as to ensure flood risk is not increased. The channel will then be reinstated to pre-commencement depths to maintain the capacity of the watercourse. This is considered appropriate, subject to the submission of further 	<ul style="list-style-type: none"> a) No further comment. b) The Applicants would add that a climate change allowance of 40% (additional to a 1 in 100 year event) has been factored into the outline sustainable drainage system (SuDS) designs for attenuation and infiltration. The Applicants are preparing an Outline Operational Drainage Management Plan for the attenuation design which will be submitted to the Examinations at Deadline 3. The outline infiltration design is summarised in the SuDS Infiltration Technical Note submitted to the Examinations at Deadline 2 (document reference ExA.AS-9.D2.V1). c) The Applicants direct the ExA to EA-309 within the updated SoCG with the Environment Agency submitted at Deadline 1 (REP1-077) which includes the text referred to regarding the Watercourse Crossing Method Statement. EA-210 includes commitments on updates to the CoCP. d) Noted.



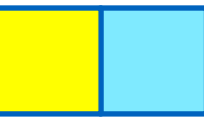
ExA. Question Ref.	Question addressed to	ExA. Question	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
				<p>detailed plans and method statement. These will be required through the Flood Risk Activity Environmental Permitting process, and as part of the watercourse crossing method statement. The watercourse crossing method statement is to be submitted as part of the Code of Construction Practice (CoCP) under Requirement 22. The draft Statement of Common Ground (SoCG) (June 2020; Document Reference: ExA.SoCG-3.D0.V1) between the Applicant and the Environment Agency confirms that the Environment Agency are to be consulted on the preparation of the watercourse crossing method statement, and this will be noted in an updated Outline CoCP. The applicant has also agreed in the draft SoCG, to include in the final CoCP a commitment to not store materials: "within Flood Zone 2 or Flood Zone 3 along the length of the onshore cable route, and to store spoil outside of the Hundred River flood plain", which should ensure no increase in flood risk elsewhere as a result of the works. There are no development works currently proposed within the fluvial Flood Zones of Friston Watercourse. Any works within 8m of the watercourse to provide for a surface water discharge point from the substation site will require an Environmental Permit from the Environment Agency. A 'Flood Management Plan' is to be prepared as part of the CoCP. Section 20.3.3 of the Environmental Statement (document reference 6.1.20) states that this will be developed in consultation with the Environment Agency and LLFA. The draft SoCG confirms that this will be noted in an updated Outline CoCP.</p> <p>d) The installation of cabling under the Main River watercourse using an open-cut trenching method is discussed, and considered appropriate, as outlined above. If non-main rivers (Ordinary Watercourses) are to be crossed with use of a temporary dam then a permit will be required from the Lead Local Flood Authority Suffolk County Council. A Flood Warning and Evacuation Plan will be produced for the temporary works at the Hundred River, to ensure that appropriate actions can be taken on receipt of a Flood Alert or Flood Warning. This should serve to ensure the safety of the personnel, the protection of the works, and that the river will be able to function correctly without an increase in flood risk.</p>	
1.7.6	Environment Agency	1 2	<p>Offsite Highway Improvements Do you consider that the omission of the offsite highway works and temporary laydown areas for structural works at</p>	While we agree that ideally the FRA should have included an assessment of the impacts of the temporary laydown area on	The Applicants direct the ExA to EA-203 within the updated SoCG with the Environment Agency submitted at Deadline 1



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		Marlesford Bridge from the FRA meets the tests set out in NPS?	<p>offsite flood risk, we understand that there is uncertainty over whether the site will be needed and the nature of the site requirements, which would make it difficult to undertake a detailed assessment within the FRA.</p> <p>In our Relevant Representation, we stated that there should be no land raising or built development on site, due to the potential for such works to increase flood risk elsewhere, and uncertainty as to whether any increase in risk could be appropriately managed. We have subsequently further considered the specific characteristics of the flood zones at this location, and the potential to adequately manage flood risk.</p> <p>There are relatively large flood zones upstream of the proposed site, with no properties at risk; so in our opinion it is likely that any reduction in flood storage as a result of the temporary works would have a minimal impact on flood depths and extents upstream, and would be capable of being managed through temporary or permanent compensatory flood storage or landowner agreement.</p> <p>A Flood Risk Activity Permit (FRAP) will be required prior to the commencement of any significant works within 8 metres of the Main River Ore at this location. Therefore we consider that the flood risk implications of the laydown area can be considered as part of the FRAP application once details are known.</p> <p>The draft Statement of Common Ground (June 2020; Document Reference: ExA.SoCG-3.D0.V1) between the Applicant and the Environment Agency confirms that: <i>"The Applicants and Environment Agency agree that to resolve this matter the Applicants will undertake a Flood Risk Assessment of works required within Work No. 37 as part of any future Environmental Permit application"</i>.</p> <p>The structural works to Marlesford Bridge will be assessed through the FRAP process, as is usual for bridge works, as the proposed works are not known in detail at present. These comments will also be useful in respect of question 1.7.7.</p>	(REP1-077) which includes the text referred to regarding Work No. 37.
1.7.9	SCC	<p>1 2 Flooding incidents along East Suffolk Coastline The FRA states that the Level 1 SFRA reports a number of notable flooding incidents along the East Suffolk coastline. Can you confirm if any of the incidents affected the landfall location? The response should include details of such events including location, date and extent.</p>	<p><i>ESC Lead Authority</i></p> <p>The Council are not aware of any historical flooding incidents from abnormally high sea levels which have affected the landfall site. The Transition Bay is located on a cliff top that is well above any recorded or predicted sea level anticipated to occur during the service life of the asset. The buried infrastructure linking the Transition Bay with the bored break out point is below, within and above the normal tidal range. Unusually high tides will therefore cover more of this zone than normal tidal action and may lead to erosion/accretion of the surface. The impact of this potential change in ground level is considered elsewhere in the DCOs.</p>	Noted.



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			<p>Although ESC has responded to this question following a request from SCC, either SCC as Lead Local Flood Authority or the Environment Agency will lead on flood risk questions going forward.</p>	
1.7.10	SCC	<p>1 2 Existing drainage patterns Please expand on the comments in your RR that the information within the FRA is not sufficient to determine how the proposed development would interact with existing drainage patterns. What information would you expect to see?</p>	<p><i>SCC Lead Authority - Lead Local Flood Authority</i></p> <p>For clarity, the Relevant Representation (RR) referred to the "information within the application", not specifically the Flood Risk Assessment (FRA). Whilst this does include the FRA, it also extends to the ES, Outline Code of Construction Practice (OCOCP) & OLEMS. To avoid repetition, the concerns with the OCoCP & OLEMS are found in response to question 1.7.11.</p> <p>The flooding of Friston in October 2019 provided SCC LLFA with evidence of multiple surface water flow paths surrounding Friston that are not shown accurately on EA National Mapping, despite the return period of the rainfall event being recorded as 1 in 40 (likely less due to a lack of historic rainfall records at rain gauge), thus well within the intended scope of this mapping.</p> <p>Subsequently, the Friston Surface Water Management Plan (SWMP) has been produced. The hydraulic model is more refined than the EA National Mapping and presents a more accurate baseline. On this basis, SCC LLFA cannot agree that an FRA based on superseded information is suitable. Given the recognition in the FRA of the historic surface water flooding issues experienced by Friston, it would have been prudent for the Applicants to have established a model themselves to have used as a baseline for the original assessment. Nonetheless, they have the SCC LLFA model and could assess the interaction of the proposed development with this new baseline.</p> <p>The submitted FRA identifies the surface water flow path north of Friston and acknowledges the interaction between this and the proposed development. This flow path is associated with multiple existing ordinary watercourses, an offline storage/infiltration basin (which provide significant interception) and ultimately enters at the head of the Main River in Friston on Church Road. Whilst acknowledging the proposed developments interaction with this key flow path, the Applicants have not provided any further details on this matter or any potential mitigation. We acknowledge the Applicants have reserved an area for a potential additional flood relief basin, however it is not possible to determine the suitability of this proposal due to a lack of supporting information. SCC LLFA have a clear policy of not permitting the culverting of watercourses. Whilst Land Drainage Act consent is separate to the DCO process, it is important to understand the impact of the development on this key flow path in order to understand the associated impacts on surface water flood risk.</p>	<p>The Applicants note the flooding of Friston in October 2019 shortly before the Applications were submitted to the Planning Inspectorate. As such, this flooding event and the Friston Surface Water Management Plan (SWMP) were not captured within the baseline presented of the ES. The Applicants have reviewed the Friston SWMP and are preparing an Outline Operational Drainage Management Plan to submit to the Examinations at Deadline 3 to address this matter.</p> <p>The Applicants are continuing to discuss matters relating to flood risk with the Councils throughout the SoCG process.</p>



ExA. Question Ref.	Question addressed to	ExA. Question Ref.	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
				<p>Given multiple flow paths are identified in the SWMP to the east of Friston and this is the route the cable corridor will take, the potential for interaction with previously unidentified surface water flows paths, particularly adjacent Grove Road, Friston, should be assessed.</p> <p>We expect the residents of Friston to be included in the ESs as a receptor. This has currently been omitted by the Applicants on the basis that they have committed to not increasing flood risk. The cumulative impact during construction of an increase in sediment supply and any subsequent increase in flood risk, given the culverted nature of the watercourse in Friston, should also be assessed to determine any need for monitoring/maintenance of the Main River during construction.</p>	
1.7.11	SCC, ESC	1 2	<p>Outline Code of Construction Practice (OCoCP) and Outline Landscape and Ecological Management Strategy (OLEMS)</p> <p>Are you satisfied that there is sufficient information in the OCoCP to satisfactorily secure the SWDP and Flood Management Plan and within the OLEMS to secure the final SuDs?</p>	<p><i>SCC Lead Authority - Lead Local Flood Authority</i></p> <p>No, the Councils are not satisfied that either the OCoCP or the OLEMS provides sufficient security to secure later agreement.</p> <p>Outline Code of Construction Practice</p> <p>This document lists multiple mitigation options, some of which do not demonstrate an approach which prioritises the use of Sustainable Drainage Systems (SuDS), as per NPS EN-1. We are aware from the construction of East Anglia One (EA1) & East Anglia Three (EA3) cable corridor of problems encountered in the management of surface water that resulted in reactive, proprietary surface water drainage solutions (such as siltbusters) being implemented. The EA were involved with this at the time. Our understanding is that this was caused by a lack of space available for SuDS (hence the use of proprietary products). The proposed developments do not demonstrably allocate space for SuDS along the cable corridor. We acknowledge the submission refers to areas where topsoil will be removed to facilitate basins, however it has not been demonstrated these basins;</p> <ul style="list-style-type: none"> • Can be accommodated within the redline boundary; • Can be sized to manage 1:100 + CC; • Can be designed to provide treatment; • Can discharge surface water in a sustainable manner and in accordance with the surface water disposal hierarchy; and • Do not result in knock on impacts such as increasing the height of topsoil storage elsewhere <p>Given the proximity of Friston and the known surface water flood risk, this approach is not satisfactory. For example, where the cable route crosses Grove Road, Friston, is a low point of the cable corridor with the contributing area from the east extending some 700m to the upper extent of the catchment. A cable corridor of 700m length, falling towards Grove Road, Friston, (which has known surface water flooding problems) with no demonstrably feasible method of</p>	<p>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>The Applicants note a contradiction within Chapter 20 (APP-068) and its associated appendices with regard to crossing of Ordinary watercourses. From their desk-based review, the Applicants did not identify any Ordinary watercourses which will be crossed by the onshore cable route. However, it is accepted that not all Ordinary watercourses may be depicted or identifiable on available mapping. Should Ordinary watercourses be identified prior to construction the Applicants will ensure appropriate measures for their crossing are contained within the final Watercourse Crossing Method Statement prepared in accordance with Requirement 22 of the draft DCO (APP-023).</p> <p>The Applicants will submit an updated draft DCO (APP-023) which includes a new Requirement for an operational drainage management plan which must accord with the Outline Operational Drainage Management Plan to the Examination at Deadline 3.</p>



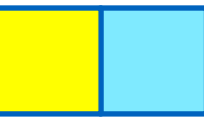
ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<div style="background-color: yellow; width: 10px; height: 100%; margin-bottom: 5px;"></div> <div style="background-color: cyan; width: 10px; height: 100%;"></div>	<p>managing and disposing of surface water in a sustainable manner is not satisfactory and has the potential to increase off site flood risk.</p> <p>No details have been provided to demonstrate that the proposed Construction Consolidation Site's (CCS) required for the construction of the cable corridor and substations have a demonstrable method of managing surface water, including treatment. Indeed, the Applicants' response from Appendix 20.1 (pg 18), states the CCS's will not require their own SuDS ponds.</p> <p>Appendix 20.1 (pg 19) & 20.6.1.1 state that there are no ordinary watercourse crossings on the cable route. This is contradicted by para 11 of Appendix 20.3. The mitigation options need to be site specific, for which the site characteristics need to be known. If indeed no ordinary watercourses are present and thus, all construction surface water must be infiltrated (in the absence of alternatives), the absence of infiltration testing is potentially problematic and at the very least leaves questions regarding feasibility of sustainable surface water disposal during construction.</p> <p>It is also unclear how the proposed haul road/access roads will be sustainably drained.</p> <p>Outline Landscape and Ecological Management Strategy It should be noted that we have requested the Applicants provide a specific Requirement relating to surface water management for the final SuDS as opposed to including this in the OLEMS, as was the case for EA1.</p> <p>No information is provided in the submission to enable SCC LLFA to determine whether the proposed SuDS basins are sufficiently sized to manage the volumes of surface water generated by the proposed development. No other design assumptions such as impermeable areas served by the SuDS, design water depths, side slopes etc. are provided with the submission. In addition to this, as far as we are aware to date, the Applicants have not undertaken any infiltration testing. Our understanding is that the Applicants intend to pursue a positive discharge to the Main River in Friston, regardless of infiltration results, the degree of infiltration would merely act as a contribution to reducing, but not removing the positive discharge. We have made it very clear to the Applicants that this is not an approach we support.</p>	
1.7.13	SCC	<p>1 2 Adoption and maintenance Paragraph 5.7.10 of NPS EN-1 states that the DCO or any associated planning obligations should make provision for the adoption and maintenance of any SuDS, including any necessary access rights to the property. It does not appear that such details have been included with the application.</p> <p>a) Do you take responsibility for maintaining the</p>	<p><i>SCC Lead Authority - Lead Local Flood Authority</i></p> <p>SCC as LLFA do not adopt SuDS.</p> <p>In accordance with the SuDS adoption hierarchy, the option of Anglian Water (AW) adoption would be preferable, although we are not aware of the Applicants engaging in discussions with AW or whether AW would deem the SuDS</p>	<p>The Applicants will adopt and maintain the SuDS basins serving the Projects' onshore substations.</p>



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<p>drainage for the lifetime of development and if so how is this secured and enforceable through the DCO?</p> <p>b) What would be the council's preferred adoption arrangements?</p>	<p>on this development eligible for adoption.</p> <p>The only other feasible option is for the Applicants to take on the adoption themselves or appoint a management company on their behalf. Our expectation is for the Applicants to maintain the SuDS serving their substations. The SuDS serving the National Grid infrastructure and access road should be adopted and maintained by National Grid. This is on the basis that the National Grid infrastructure could remain on site beyond the lifetime of the EA1N & EA2 substations, thus if they were removed and the Applicants no longer had any infrastructure on site, it would not be appropriate for them to have responsibility for maintenance of SuDS serving the access road or National Grid substation.</p>	
1.7.14	EA	<p>Water Framework Directive (WFD) Can the Environment Agency confirm whether or not it agrees that the Water Framework Directive information provided in the application appropriately demonstrates the Proposed Development's compliance with the requirements of the Water Framework Directive? Please comment on the Applicant's comments in Table A20.42 [APP-036]. Do any other matters relevant to Water Framework Directive need to be taken into account?</p>	<p>We can confirm our agreement that the Water Framework Directive information provided in the application was sufficient. As highlighted below, further assessment will be required to inform the detailed design and implementation of the proposed scheme.</p>	No further comment.
1.7.15	EA	<p>WFD The Applicant has confirmed that an assessment of migratory fish and river connectivity was not undertaken. The Applicant has now said that it will commit to pre-construction surveys on fish and eels within an updated OLEMs. Are you satisfied that this is sufficient to allay your concerns raised in relation to the Water Framework Directive compliance assessment and Table A20.42?</p>	<p>We can confirm that we are satisfied with the commitment by the Applicant to undertake pre-construction eel and fish baseline surveys. As agreed as part of the draft SoCG (June 2020; Document Reference: ExA.SoCG-3.D0.V1) between the Applicant and the Environment Agency, an updated OLEMS will specify that the Environment Agency are to be consulted on the scope of those studies.</p>	The Applicants direct the ExA to EA-301 and EA-304 within the updated SoCG with the Environment Agency submitted at Deadline 1 (REP1-077) which include the text / commitments referred to.
1.7.16	SCC	<p>Several RRs express concerns relating to recent flooding events in Friston. a) Has any work been undertaken to identify drains within the site?</p>	<p><i>SCC Lead Authority - Lead Local Flood Authority</i></p> <p>The Friston Surface Water Management Plan, produced by SCC LLFA, identifies ordinary watercourses north of Friston. As highlighted in our response to 1.7.11, the submission contains contradicting statements on the extent of ordinary watercourses within the red line boundary and the potential project interface with these ordinary watercourses.</p>	<p>The Applicants have reviewed the Friston SWMP and are preparing an Outline Operational Drainage Management Plan to submit to the Examinations at Deadline 3 to address this matter.</p> <p>The Applicants have responded to the inconsistency identified with the Application documents at 1.7.11.</p>
1.7.17	EA	<p>Secondary Aquifers In your RR [RR-039] you suggest that Table 20.12 of ES Chapter 20 could include reference to secondary aquifers supporting private supply. In the Applicant's response [AS-036] it is stated that that a reference to secondary aquifers supporting private supply could be included in Table 20.12 but that this would make no material difference to the impact assessment. Do you agree?</p>	<p>It remains our view that Table 20.12 could be misleading. The Applicant states in response to our Relevant Representation that the single 'groundwater' receptor is intended to cover all aquifer categories, but this wasn't immediately clear. However, taking all references together (including Table 20.7 & 20.8), and especially with the recent progress on the draft SoCG in relation to groundwater receptors, we would agree that it does not matter whether or not secondary aquifers are specifically included within Table 20.12, if the impact assessment will be the same given the other clauses. This appears to be the case. The commitments from the Applicant in the current draft SoCG</p>	The Applicants direct the ExA to EA-109, EA-110, EA-205 and EA-210 within the updated SoCG with the Environment Agency submitted at Deadline 1 (REP1-077) which include the text / commitments referred to.



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			(June 2020; Document Reference: ExA.SoCG-3.D0.V1), along with the further proposed text provided to us via email on 16/10/20 (please see 1.7.18 below), indicates that all groundwater abstractions will be afforded the relevant protection.	
1.7.18	EA	<p>1 2</p> <p>Groundwater dependant ecological sites Please provide an update on outstanding matters still under discussion.</p>	<p>In our discussions with the Applicant, we asked that the Statement of Common Ground confirm that a hydrogeological risk assessment (HRA) would be required for any works within 500m of any Groundwater dependant ecological sites. This was not included in the draft SoCG (June 2020; Document Reference: ExA.SoCG-3.D0.V1). However, following further correspondence on what the HRA requirements might mean in practice for any such sites, the applicant has proposed via email (16/10/20) the following text for inclusion in an updated Statement of Common Ground:</p> <p>The Applicants agree that the OCoCP will be updated to include:</p> <ul style="list-style-type: none"> • A commitment to prepare a Method Statement for any crossings made by a trenchless technique within the onshore cable route (excluding landfall). This will provide details of the design parameters and any measures to minimise impacts upon groundwater; • Mapping of all existing abstraction licences, all domestic abstractions and all protected rights; measures will ensure no derogation to these as a result of the Projects; • A commitment to undertake a pre-construction water features survey (visual inspections) where required. This will be used to ensure that water features are identified and subject to hydrogeological risk assessments as necessary prior to works commencing. • Clear identification of whether dewatering activities will require an environmental permit. It will be specified that any water removed from subsurface excavations is returned to ground and that any water removed from a watercourse will be returned to the same watercourse, unless otherwise agreed with the Environment Agency. • A commitment to undertake a hydrogeological risk assessment for works that could cause changes to aquifer flow or affect aquifer quality within 500m of groundwater dependent ecological sites (i.e. international, European, national and county designations). A screening exercise will be undertaken 	<p>The Applicants refer the ExA to EA-205 within the updated SoCG submitted at Deadline 1 (REP1-077) where this text can be found. It should be noted that the text within the current SoCG has been updated to include a further commitment requested by the Environment Agency by e-mail (30/10/20), as follows:</p> <p>A commitment that any dewatering activities that require an abstraction licence will follow the Environment Agency's Hydrogeological Impact Appraisal for Dewatering.</p>



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			<p>(utilising desk-based information such as BGS borehole records, solid and superficial geological mapping and OS mapping, site citations, Natural England's Priority Habitats Inventory and Phase 1 habitat survey data where available) to determine whether or not identified ecological sites have features / habitats that are likely to be groundwater fed. Where features / habitats that are likely to be groundwater fed are within 500m of works that require excavations below 1m, a hydrogeological risk assessment will be undertaken.</p> <ul style="list-style-type: none"> A commitment to undertake a hydrogeological risk assessment for works that require excavations below 1m within 250m of boreholes or springs. <p>We can confirm that the inclusion of the above text would be sufficient to satisfy our concerns on this, and other groundwater protection related issues.</p>	
1.7.19	EA	1 2 Watercourse crossing method statement In your RR [RR-039] you requested that a control measure to avoid coarse fish spawning season (March to June) should be included and addressed as part of the watercourse crossing method statement. Please comment on the Applicant's response that they will seek to avoid this season rather than avoid. Should this be secured in the dDCO?	<p>It has been agreed as part of the draft SoCG (June 2020; Document Reference: ExA.SoCG-3.D0.V1) between the Applicant and the Environment Agency, that an updated Outline CoCP will state that the Environment Agency are to be consulted on the Watercourse Crossing Method Statement. The Hundred River crossing will also require a separate Flood Risk Activity Permit from the Environment Agency. As part of that process it is expected that the applicant will provide relevant survey information in support of decisions regarding any mitigation procedures that will need to be added. This will include fish as well as other protected species. With regard to fish, it is possible that if the fish spawning season cannot be avoided there may be measures that can be included within the construction method so that the work can take place with reduced risk of impact. Survey results will help identify and inform this.</p>	<p>The Applicants direct the ExA to EA-309 within the updated SoCG submitted at Deadline 1 (document reference ExA.SoCG-3.D1.V2) regarding the updated Outline CoCP and the Watercourse Crossing Method Statement. Various survey commitments are set out in EA-109, EA-205, EA-301, EA-302, EA-304 and EA-305. The Applicants note the response regarding possible mitigation measures should works overlap with the fish spawning season.</p>
1.7.20	East Suffolk Drainage Board	1 2 Impact Assessment Methodology The SoCG [AS-049] states that the impact assessment methodologies used for ES Chapter 20 are not agreed. Please can you provide further details on your concerns relating to the impact assessment methodologies?	<p>I am writing on behalf of the East Suffolk Internal Drainage Board to inform the Examining Authority that the Boards previous concerns, expressed in the SoCG [AS-049] regarding the impact assessment methodologies used for ES Chapter 20 have been addressed. In consultation with the applicant and their agent an updated SoCG has been drafted and confirmed which now has no outstanding issues or disagreements. We believe this will be issued to yourselves by the applicant before Deadline 1.</p>	<p>No further comment</p>



2.6 Historic Environment

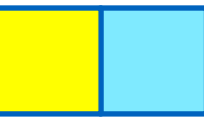
ExA. Question Ref.	Question addressed to	ExA. Question Ref.	Interested Parties' Response at Deadline 1	Applicants Comment's at Deadline 2
1.8 Historic Environment				
1.8.12	Historic England	1 2 Church of St Mary Your RR [RR-047] states you consider that the proposed developments would result in a very high level of harm to the significance of the grade II* listed Church of St Mary, and that you have concerns that the mitigation will bring about further changes to the setting of the church. Do you consider that the location of the proposed substations and the proposed mitigation would cause substantial harm to the significance of this heritage asset?	No further comments provided	The Applicants refer to their response to Historic England point 091 (6.1.3) of the Applicants Comments on Written Representations (ExA.WR_2.D2.V1) submitted at Deadline 2, noting that Historic England are in agreement that the impact to the significance of Church of St Mary does not amount to substantial harm as defined in NPS EN-1 and NPPF policy.
1.8.12	ESC	1 2 Church of St Mary Your RR [RR-047] states you consider that the proposed developments would result in a very high level of harm to the significance of the grade II* listed Church of St Mary, and that you have concerns that the mitigation will bring about further changes to the setting of the church. <ul style="list-style-type: none"> Do you consider that the location of the proposed substations and the proposed mitigation would cause substantial harm to the significance of this heritage asset? 	<i>ESC Lead Authority</i> No - The Council does not consider the harm to be substantial but rather a high level of less than substantial harm. It is considered that substantial harm cannot arise from setting impacts on the significance of a designated asset and are much more likely to arise from direct physical impacts on the actual building, for example, the loss of key features or partial demolition or total demolition.	The Applicants have noted the Councils response and have submitted an Archaeology and Cultural Heritage Clarification Note to the Examinations at Deadline 1 (document reference ExA.AS-10.D1.V1) which considers this matter further following SCC's provision of their Rapid Historic Landscape Assessment (2019).
1.8.13	SCC, ESC	1 2 Parish Boundaries SCC and ESC consider that the proposed developments would result in the loss of the historic parish boundary between Friston and Knodishall and this has not been adequately addressed. The ExA note the responses of the Applicant to this point in their response to the RR [AS-036]. How would the schemes overcome the loss of parish boundary PB1? Is it proposed to mitigate this loss?	<i>ESC and SCC Joint Lead</i> The design of the projects will result in the loss of this feature within the red line Order Limits. The significance of this feature and its relationship to the character of the site and locality, as well as its contribution to the setting of other heritage assets, is set out in detail in the LIR paragraphs 15.10-15.21 and in Appendix 1 of the LIR. Further design refinement work through the consolidation of infrastructure or commitment to the use of a GIS National Grid substation would provide the potential to reduce the degree or even avoid the loss of the historic parish/Hundred boundary. If its loss is found to be acceptable, archaeological investigations of the feature can be included in the detailed Written Scheme of Investigation (WSI) for mitigation, which at present is submitted as a high-level document, to be informed by further surveys. The Councils have also engaged with the Applicants regarding a package of compensatory measures identified for inclusion in a s111 agreement which would record and evaluate the historic landscape of the site and surroundings in detail and publish both academic and more popular outputs. These approaches offset to some degree the harm caused	The Applicants have noted the Councils response and have submitted an Archaeology and Cultural Heritage Clarification Note to the Examinations at Deadline 1 (REP1-021), which provides further consideration of the parish / Hundred boundary. An updated draft DCO (APP-023) and an updated Outline WSI (APP-582) will be submitted to the Examinations at Deadline 3.



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicants Comment's at Deadline 2
			by the loss of this feature which in other circumstances (such as a housing development) would be incorporated into the design of the scheme and retained in situ as feature of the landscape and a public footpath (and private vehicular) right of way, albeit in a new context.	
1.8.15	Historic England	<p>Offshore archaeology Historic England (HE) [RR-047] state that the large number of geophysical seabed anomalies recorded highlights the potential for significant historic environment features to be present, and that they are concerned to ensure that the Outline Offshore Archaeological Written Scheme of Investigation considers how the construction can be designed sensitively to take into account known and potential heritage assets.</p> <p>HE is concerned to ensure the appropriate depth for a continuous stratigraphy is incorporated into the planning of the geotechnical survey, with boreholes and vibrocores stored and maintained to maximise archaeological objectives. This is to mitigate impacts on archaeological deposits of high potential.</p> <p>The ExA note the responses of the applicants to this point of view in their responses to the RRs [AS-036] and the commitment to further archaeological assessment of any further geophysical data acquired for the projects</p> <p>To the Applicant: a) Respond further to the concerns of Historic England; can the Offshore WSI be adapted to meet their concerns during the examination and any consequent amendments incorporated into the Condition 13(g) Preconstruction plans and documentation of the dDCO?</p> <p>To Historic England: Provide any further comments to the responses of the applicants, should you wish to do so.</p>	No further comments provided.	Yes, the Offshore WSI can be updated to meet Historic England's concerns during the Examinations. An updated Outline WSI Archaeology and Cultural Heritage (Offshore) will be submitted at Deadline 3. The Applicants have been and will continue to engage with HE through the SoCG process regarding any proposed amendments to Condition 17(g) of the generational DML and 13(g) of transmission DML.
1.8.16	SCC	<p>Onshore archaeology SCC [RR-007] note that the submitted level of information falls short of the level of information required by the County Archaeologist. The ExA note that engagement continues with the County archaeologists</p> <p>The ExA note the responses of the applicants to this point of view in their responses to the RRs [AS-036] and the commitment to engage with the County Archaeologists to minimise potential impacts regarding buried archaeological remains.</p> <ul style="list-style-type: none"> Outline additional necessary measures to be secured within the final Written Scheme of Investigation (Onshore) and pre-commencement archaeology execution plan 	<p>SCC Lead Authority - Archaeology</p> <ol style="list-style-type: none"> Comments have been sent on the Written Scheme of Investigation (WSI) and Outline Pre-Commencement Archaeology Execution Plan (OPCAEP) to the Applicants as part of the SoCG discussion which are considered appropriate to provide robust measures and draw attention to the Archaeology Appendix of the LIR for details. A key point is that there will not be a final WSI, but an Outline WSI with nested WSIs beneath it. The Applicants have said in the draft SoCG that 'The Applicants have reviewed the Councils comments on the Outline Written Scheme of Investigation (WSI) and agreed to incorporate changes'. The revised documentation has not yet been reviewed so the comments are still valid. 	The Applicants refer to their response provided to Q1.8.16 in Applicants' Responses to Examining Authority's Written Questions (REP1-113) submitted at Deadline 1. The Applicants have also submitted the following documents at Deadline 1: <ul style="list-style-type: none"> Archaeology and Cultural Heritage Clarification Note (REP1-021); Pre-Construction Trial Trenching Report (REP1-024); Geophysical Survey Report (REP1-025 – REP1-033); and Onshore Archaeology: Earthworks Report (REP1-034)



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			<ol style="list-style-type: none"> 2. OPCAEP - Comments are provided in the Archaeology Appendix of the LIR, and required amendments identified to the OPCAEP are covered in more detail in the Archaeology SoCG and subject to further discussion with the Applicants. 3. Although not directly in the question asked by the Examiners, we have also recommended some changes to DCO wording, which needs to be raised in relation to changes to the WSI and OPCAEP as the DCO wording and the WSIs together form the provision for archaeological work and are interlinked. Suggested wording is also included in the Archaeology Appendix of the LIR to more accurately reflect likely stages of work. The Applicants have acknowledged comments, but we have not yet had any detailed discussion on revised wording. 4. We would also draw attention to points made in the LIR regarding the level of trial trenched archaeological evaluation and the implications for risks in deferring the planning of logistics for archaeological mitigation, particularly excavation, to post-consent, discussion of which is also reflected in the Archaeology SOCG. 	<p>With regards to suggested changes to DCO wording, the Applicants will continue to engage with the Councils via the SoCG process.</p>



2.7 Landscape and Visual Impact

ExA. Question Ref.	Question addressed to	ExA. Question Ref.	Interested Parties Response at Deadline 1	Applicant's Comments at Deadline 2
1.10 Landscape and Visual Impact				
1.10.2	ESC	1 2	<p>A number of RRs raise concerns about the visual impact of development on Friston, with reference to the adequacy of mitigation.</p> <p>Is further mitigation required and what form might this take? Would additional planting of trees and hedgerows be an appropriate method to resolve this? What form might additional planting take?</p> <p><i>ESC Lead Authority</i></p> <p>Given the size and location of the proposals relative to receptors it is not possible to fully mitigate the landscape and visual effects by planting. Additional planting has been considered, but there comes a point at which too much planting can have an adverse impact on prevailing landscape character, and erosive of the historic field boundary pattern that is found in the area between the substation site and Friston village.</p> <p>The timeliness of mitigation planting remains a significant concern. This relates principally to the question of growth rates as discussed at 1.2.75 and the related matters of; handling of onsite soils prior to planting, the management of the planting contract and procurement process, and the importance of the effective restoration of the site soil prior to planting. An exemplary approach by the Applicants in these areas is essential.</p> <p>If any further planting were considered, it would most appropriately be in the form of reinforcement of the existing field boundary hedgerow pattern and the addition of hedgerow trees. The Applicants have proposed advance planting within the red line and the Councils have requested a package of offsite planting as part of the emerging s111 agreement. This could introduce new hedge planting or gapping up closer to visual receptors to ensure more rapid visual mitigation for these locations prior to maturity of the on-site planting. However, any offsite planting is entirely in the gift of the relevant landowners and therefore the delivery of this planting will be a significant challenge for ESC. These matters are still being discussed between the Councils and the Applicants.</p> <p>Additional embedded mitigation could be secured through modifications to the design of the development as the outline of the scheme is refined. This would relate to both exploration of opportunities to minimise the size of the scheme footprint and height both pre-consent during the examination and post- consent during the procurement process. The use of a GIS rather than the AIS, as proposed in the applications would significantly reduce the footprint of the National Grid associated development by approximately two thirds. However, although visualisations of this option have been provided by the Applicants the impacts of this design have yet to be fully assessed through a LVIA and other assessments.</p>	<p>The Applicants note the need to balance potential landscape and visual impacts/mitigation and potential cultural heritage impacts/mitigation at the onshore substation locations through the mitigation planting associated with the implementation of a landscape management scheme</p> <p>As per the Draft SoCG: East Suffolk Council and Suffolk County Council 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 draft DCO (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>



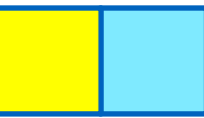
ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties Response at Deadline 1	Applicant's Comments at Deadline 2
1.10.2	SASES	1 2 A number of RRs raise concerns about the visual impact of development on Friston, with reference to the adequacy of mitigation. Is further mitigation required and what form might this take? Would additional planting of trees and hedgerows be an appropriate method to resolve this? What form might additional planting take?	SASES See SASES WR Landscape & Visual Impact	The Applicants note the Written Representation received from SASES regarding landscape and visual impact and will respond further at Deadline 4.
1.10.8	SASES	ES Chapter 29, paragraph 41 [APP-077] and the OLEMS, paragraph 81 [APP-584] contains the assumptions used for vegetation growth rates. These predictions have been used in the production of the photomontages, illustrating the effectiveness of the planting at year 15. It is stated in the OLEMS (paragraph 84) that heights of taller trees at 15 years post planting are based on an assumption of planting 60cm cell grown plants, with an average annual growth rate of 30cm per year for the first 5 years and 50cm per year for the next 10 years. These assumptions are based on guidance produced by IEMA in 2019. As such the growth rates reported in the OLEMS and the LVIA chapters are a "rule of thumb" to establish growth rate without considering local conditions. ES Chapter 29, paragraph 68 states that the magnitude of change (for both landscape and visual impacts) is assessed at 15 years post planting which results in the assessment of residual impact significance. This is based on the assumption that the planting will be successful at the growth rates provided at paragraphs 81 – 84 of the OLEMS. It is therefore unclear whether this can be considered a worst case scenario in term of assumed growth rates for the purpose of the EIA. Various representations, including from the County Council, ESC and Friston PC also consider that the assumed growth rates are not reasonably justified in the prevailing local conditions given local soil and climatic conditions. The ExA note the applicants' comments on the RRs [AS-036]. a) Explain the confidence it has in the growth rates for proposed planting assumed for the purposes of the assessment and in the photomontages provided? b) To what extent have these assumptions taken into account the specific growing conditions, including local conditions of soil, drainage, and climate, for relevant species at any particular location? c) What effect would a more cautious approach to growth rates have on the submitted montages? The use of professional judgement should be clearly stated and explained.	SASES questions the assumptions made about growth rates for trees and hedges. Please refer to expert report from Jon Rose which forms part of SASES WR Landscape & Visual Impact	As set out in section 3.5.4 of the OLEMS (APP-584)), assumed growth rates are based on relevant guidance from the IEMA, research of relevant published literature and plant nurseries, and are comparable to precedents established by other NSIPs. The Applicants held ETG meetings in which growth rates were discussed with the local planning authority (Table 3.1 of the OLEMS (APP-584)). Section 3.5.4 of the OLEMS (APP-584) provides information on the assumed growth rates of trees utilised for landscaping. The Applicants highlight that the growth rates of landscape planting adopted for the assessment presented in the ES were lowered following the Preliminary Environmental Impact Report in response to the Councils Section 42 consultation response, as referred to in Table 29.1, Appendix 29.1 (APP-565). The Applicants note the Written Representation received from SASES regarding landscape and visual impact and will respond further at Deadline 4.



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties Response at Deadline 1	Applicant's Comments at Deadline 2
1.10.13	Natural England	<p>1 2 ES Chapter 29, paragraph 180 [APP-077] sets out that the susceptibility of the Ancient Claylands LCT is reduced as the landscape is influenced by the presence of the existing double row of high-voltage overhead transmission lines, with changes experienced in the context of existing electrical infrastructure and large-scale elements.</p> <p>However, there is a clear difference between a double row of high level largely see through transmission lines when compared to the proposed extent and density of ground level infrastructure.</p> <p>a) To what extent do you consider that the susceptibility of the Ancient Claylands LCT to change is reduced by the presence of the existing overhead transmission lines?</p> <p>b) Compare and contrast in landscape character terms the existing effects of the overhead transmission lines and the proposed substation development.</p> <p>To Natural England:</p> <p>Do you agree with the applicant's assessment of the susceptibility of the Ancient Claylands LCT to changes arising from the proposed developments?</p>	<p>c) This concerns landscape character and impacts around the proposed substation site outside of the AONB and therefore not something that Natural England is able to comment on.</p>	<p>No further comment.</p>
1.10.22	Natural England	<p>1 2 Natural England [RR-059, Appendix D] raise issues in respect of highlighting the need for considering and potentially committing to simultaneous construction of the onshore cabling for both projects should they both be approved, as a form of mitigation to limit construction phase landscape and visual impacts to the short term.</p> <p>They note that in their view the importance of the AONB (a nationally designated landscape with the highest level of planning policy protection) justifies the most effective mitigation being applied i.e. both onshore cabling stages to be completed together and the landscape fully restored as soon as possible.</p> <p>The ExA note the responses of the Applicant to this point of view in their response to the RR [AS-036] that the projects are being developed by two separate companies, are two separate projects and will have two separate Development Consent Order consents.</p> <p>a) Can any assurances be provided of the likelihood (or not) of financing being secured for both projects in parallel and works being carried out concurrently?</p> <p>To Natural England:</p>	<p>b) Separate installation of the cabling would either maintain a continually active construction corridor across the AONB for a much longer period; or require recent reinstatement and restoration work for the first scheme to be disrupted or entirely undone to install cabling for the later scheme. This would not only remove this part of the AONB's capacity to contribute to the area's statutory purpose (to conserve and enhance the area's natural beauty) for that extended period, but risk, given the long duration of construction activities and disruption, the scheme significantly detracting from that statutory purpose.</p>	<p>The Applicants refer to their note Effects with Regard to the Statutory Purposes of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and Accordance with NPS Policy submitted to the Examinations at Deadline 2 (document reference ExA.AS-5.D2.V1).</p> <p>As outlined in the Project Update Note 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>



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties Response at Deadline 1	Applicant's Comments at Deadline 2
1.10.23	Natural England	<p>1 2</p> <p>If the projects are not able to be carried out together, provide further views and comments on the effects of the proposals on the AoNB</p> <p>Natural England [RR-059, Appendix D] note that there is a limited amount of detail as to how construction activities would proceed along the cable route in and close to the Suffolk Coast and Heaths AONB and how soon after commencement all signs of construction activity would be removed from the AONB.</p> <p>The ExA note the responses of the applicants to this point of view in their responses to the RRs [AS-036] and notes that there is no commitment to an anticipated timetable and / or schedule for how construction activities would progress along the cable route within the immediate setting of the AONB and specific durations of Construction Consolidation Sites (CCSs) and construction activity and that this will be considered as part of detailed design once a contractor is appointed.</p> <p>Provide further information on the above, including:</p> <p>a) Further justification as to why an anticipated timetable / schedule for how construction activities would progress along the cable route within and in the immediate setting of the AONB, including details of the undergrounding works within and in the immediate setting of the AONB, covering both the topsoil stripping/trenching (and HDD if relevant) and backfilling/ reinstatement of the cable route cannot be provided (if still the case)</p> <p>b) An assessment of how such construction activities and their removal, including construction consolidation sites, would impact on the character and setting of the AONB, particularly given the unknowns at the present time.</p> <p>c) The timetable for and details of the reinstatement of trees, hedgerows and other landscape features lost during the construction phase and confirmation whether such information could be secured as part of the DCO.</p> <p>d) Any suggested proposals to mitigate the effects of the inability to provide an anticipated timetable/schedule and how they might be secured</p> <p>For Natural England</p> <p>e) Provide your comments on the responses of the applicant</p>	<p>Natural England is aware that the Applicant intends to submit more information at Deadline 2. We will provide further advice once that is submitted.</p>	<p>As outlined in the Project Update Note 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>



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties Response at Deadline 1	Applicant's Comments at Deadline 2
1.10.24	Natural England	<p>1 2</p> <p>With respect to the assessment of cumulative impacts of the EA1N and EA2 OWFs with the construction and operational phases of the Sizewell C project, the ExA note that you advise that all parties consider landscape enhancement/net gain opportunities within the AONB, and consider that an agreement should be put in place on how this could be achieved with the AONB partnership in consultation with yourselves and others.</p> <p>The ExA note the responses of the applicants to this point of view in their responses to the RRs [AS-036] that there is no policy requirement to deliver net gain for NSIP projects.</p> <p>Respond to this if necessary</p>	<p>Whilst it is acknowledged that the minimum requirement is to provide reinstatement and habitat restoration to offset project impacts, and despite it not being written within the Government net gain document for NSIPs; it is widely assumed that NSIPs are no different to other applications and statutory undertakers in this context and therefore they should provide net gain/enhancement.</p>	<p>The Applicants submitted an Ecological Enhancement Clarification Note at Deadline 1 (REP1-035) which details ecological enhancement proposals.</p>



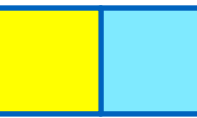
2.8 Marine and Coastal Physical Processes

ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
1.11 Marine and Coastal Physical Processes				
1.11.9	SSC, ESC	1 2 Coastal erosion predictions Do you agree with the conclusions on the extent of future coastal erosion set out in Appendix 4.6 [APP-447]?	<p><i>ESC Lead Authority</i></p> <p>Yes - The conclusions in the ES Appendix 4.6 report are based upon the Royal Haskoning DHV report: `Sizewell Cliffs Landfall Site Review of Coastal Erosion Client: Scottish Power Renewables. Reference: I&BPB4842R001F0.1 Revision: 0.1/Final Date: 19 September 2017`</p> <p>This report was updated by the RHDHV study</p> <p>`Sizewell Cliffs – EA2/EA1N Landfall - Review of Coastal Erosion Assessment of recent erosion data – implications on projected erosion lines. Client: Scottish Power Renewables Reference: PB4842I&BRP1806051516 Revision: 0.1/Final, Date: 12 July 2018`</p> <p>The revised report identified an increase in erosion rates in some areas.</p> <p>The Applicants have committed to using the updated coastal change risk information in the detailed design of the landfall infrastructure, including Transition Bay location, that will be submitted to ESC for acceptance in the LCMS.</p>	No further comments
1.11.9	Environment Agency,	1 2 Coastal erosion predictions Do you agree with the conclusions on the extent of future coastal erosion set out in Appendix 4.6 [APP-447]?	We reviewed and were satisfied with the conclusions presented on the extent of future coastal erosion through our involvement in the Landfall and Coastal Processes Expert Topic Group. We are not aware of any significant changes on the shoreline that is likely to alter the conclusions reached. However, we strongly advise that East Suffolk Council continue to be consulted as they are the operating authority for this section of coast and will have the most up to date information on any issues that might have arisen.	No further comment
1.11.9	MMO	1 2 Coastal erosion predictions Do you agree with the conclusions on the extent of future coastal erosion set out in Appendix 4.6 [APP-447]?	The MMO agree with the applicant's conclusions regarding the extent of future coastal erosion and consider that the information available to the applicant allows for a good assessment of the area, in terms of present-day trends of erosion. The MMO's understanding of the wider coastal system is generally consistent with their own, which has been developed through the MMO's involvement in the proposed Sizewell C new nuclear build over the previous decade. The MMO consider that long-term rates of erosion presented in Table A4.6 of the document are reasonable projections. The MMO further note that that the Development Consent Order (DCO) application for Sizewell C has now been submitted, meaning that the associated evidence base is now in the public domain and may further support the applicants' studies should the examining authority wish to access this. Although we do note that DCO variations have been submitted to PINs which could impact on coastal processes. Overall, the MMO is content that the applicant has successfully assessed the extent of future coastal erosion. The MMO is expecting further information from Sizewell C to be submitted in November regarding the DCO variation. Should the need arise, the MMO will give comment on any future requirements for additional modelling to account for the changes in the Sizewell C project at a later date.	No further comment

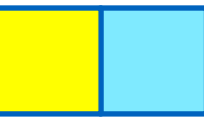


2.9 Marine Effects

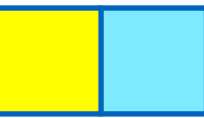
ExA. Question addressed to Ref.	Question	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
1.12 Marine Effects				
1.12.1	Trinity House	1 2 Effects on navigation, lighthouses, buoys and beacons The Trinity House RRs [RR-029] identify the likelihood of further comments. Please ensure that any substantive observations on navigational risk or infrastructure are made in your WRs at Deadline 1. Are any substantive amendments to the proposed development sought and if so why are they required and how should they be secured? Please provide best progress on and justifications for any amended dDCO drafting sought (see draft SoCG [AS-053] (ID TH-105)).	Trinity House remain at the position stated within the draft SoCG (AS-053) and are waiting to review an updated Draft DCO/DML to see what changes the applicant has made from our original suggestions and discussions. Trinity House are largely content with the document at this stage. The Applicant has stated the latest Draft DCO/DML will be available at deadline 3 and Trinity House will comment further once we have seen that document.	No further comment
1.12.2	Maritime and Coastguard Agency	1 2 Effects on shipping and navigation, search and rescue The Maritime and Coastguard Agency RRs [RR-053] identify the potential for further comments and correspondence in response to the ExA's Rule 9 Letter of 21 May 2020 [AS-058] does not set out or rule out further comments. Please ensure that any substantive observations on shipping, navigational risk or search and rescue are made in your WRs at Deadline 1. <ul style="list-style-type: none"> Please provide best progress on and justifications for any amended dDCO drafting sought (see draft SoCG [AS-051] (ID MMO-005)). 	Based on the agreements reached through the Statement of Common Ground (SoCG) to date, the MCA has no further substantive observations on shipping, navigational risk or search and rescue since our Relevant Representation (RR). This is on the understanding that our requirements are suitably addressed through the Development Consent Order (DCO) and its Deemed Marine Licence (DML). To date, there are a number of items to be addressed in the draft DCO/DML and we have not yet seen the revised version to be satisfied that the impact on shipping and navigation has been addressed through suitably worded conditions of consent. We understand the revised draft DCO/DML will be submitted at deadline 3. The MCA would like to add that it supports the MMO's position with regards to Arbitration.	No further comment
1.12.3	Maritime and Coastguard Agency	1 2 Application of Marine Guidance Notes and related documents What (if any) are the as yet undocumented implications of the proposed development arising from: a) Marine Guidance Note (MGN) [543] Safety of Navigation: Offshore Renewable Energy Installations (OREIs) – Guidance on UK Navigational Practice, Safety and Emergency Response and its annexes; b) Marine Guidance Note (MGN) [372] Safety of Navigation; Guidance to Mariners operating in the vicinity of UK OREIs; and	The MCA expects all OREIs to be assessed in accordance with MGN 543 and its annexes. There is currently one outstanding aspect on MGN 543 regarding the submission of Hydrographic Survey data to the MCA. However, this is being addressed between MCA and the applicant as per SoCG and we expect to close this by deadline 3. The other outstanding aspect is ensuring the MCA's requirements for shipping and navigation are adequately secured through condition of consent in the DCO/DML.	No further comment



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<p>c) Methodology for Assessing the Marine Navigational Safety and Emergency Response Risks of Offshore Renewable Energy Installations?</p> <p>d) Please document any substantive amendments to the proposed development that you seek to respond to these documents, identify why are they required and how these should be secured?</p>		
1.12.4	Maritime and Coastguard Agency	<p>2 Ro-ro operations</p> <p>Do you have any observations on the position of the CLdN Group on navigational safety effects for ro-ro operations [RR-026] or the Applicants' responses to those [AS-036]?</p>	<p>The MCA has considered RR-026 and the Applicants' responses to those comments [AS-036]. The MCA agrees with the comments made by CLdN and we are content with the risk mitigation measures the applicant is putting in place. However, we are yet to see the revised DCO/DML incorporating all of our requirements, and to see how the risk mitigation measures have been secured through the wording in the DCO/DML.</p> <p>The MCA would like to ensure that any route deviation or impact on Ro-Ro ferries is adequately addressed through consultation with those affected and considered in the NRA. We understand from the RR from CLdN Group that they have been consulted about the project by the applicant and they consider that there should be no impact on its operations. We believe they are seeking reassurance that the mitigation measures identified, to bring the risk to ALARP, are suitably secured through the DCO/DML – which we fully agree and support.</p>	No further comment
1.12.4	Trinity House	<p>2 Ro-ro operations</p> <p>Do you have any observations on the position of the CLdN Group on navigational safety effects for ro-ro operations [RR-026] or the Applicants' responses to those [AS-036]?</p>	<p>Trinity House agree with the statement from CLdN in RR-026 that "Any failure to provide the mitigation would present collision and allision risk to commercial shipping, particularly in the event of ships sailing off their usual course as a result of adverse weather or other incidents." The applicant's response (AS-036) is correct stating the embedded mitigation. This will include AtoN, as agreed with Trinity House, to aid identification of the windfarm and mitigate the risks to shipping in the scenario described by CLdN. Trinity House have requested clauses in the DCO/DML (APP-023) DML Part 2 7.(1) where we reserve the right to change AtoN if the risk identified at the site change over the lifetime of the developments.</p> <p>Trinity House are unaware of any adverse weather routeing used by CLdN and cannot comment on any commercial impacts created by the proposed developments or mitigation required for these.</p>	No further comment
1.12.5	Maritime and Coastguard Agency	<p>1 Individual project effects: shipping and navigation</p>	<p>There are no issues from MCA's perspective that we wish to raise. Stakeholder agreement in the hazard log and risk controls measures, as part of the formal safety assessment</p>	No further comment



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		Please identify whether there are any outstanding shipping and navigation effects that bear only on the proposed development for East Anglia ONE North?	outlined in MGN 543, is a key requirement for the MCA. We are not aware of any significant issues raised that bear only on the proposed development for East Anglia ONE North, which MCA needs to highlight here.	
1.12.5	Trinity House	1 Individual project effects: shipping and navigation Please identify whether there are any outstanding shipping and navigation effects that bear only on the proposed development for East Anglia ONE North?	Trinity House are not currently aware of any outstanding shipping and navigation effects to be addressed by East Anglia ONE North.	No further comment
1.12.6	Maritime and Coastguard Agency	2 Individual project effects: shipping and navigation Please identify whether there are any outstanding shipping and navigation effects that bear only on the proposed development for East Anglia TWO?	There are no issues from MCA's perspective that we wish to raise. Stakeholder agreement in the hazard log and risk controls measures is a key requirement for the MCA and we are not aware of any significant issues raised that bear only on the proposed development for East Anglia TWO, which MCA needs to highlight here.	No further comment
1.12.6	Trinity House	2 Individual project effects: shipping and navigation Please identify whether there are any outstanding shipping and navigation effects that bear only on the proposed development for East Anglia TWO?	Trinity House are not currently aware of any outstanding shipping and navigation effects to be addressed by East Anglia TWO.	No further comment
1.12.11	Marine Management Organisation	1 2 Marine Plans assessments Does the Marine Management Organisation (MMO) have any additional observations to raise on the Applicants' characterisation of applicable policy from marine plans and responses to that policy in the Marine Policy Clarification Note [AS-038]?	In the Relevant Representation submitted by the MMO 24 January 2020, the MMO outlined that not all policies scoped in via the Explore Marine Plans (EMP) tool has been assessed. The MMO consider that the applicant has considered the appropriate, and applicable policies and is content with the marine policy clarification note.	No further comment
1.12.12	Marine Management Organisation	1 2 Observations on marine disposal locations Does the MMO have any further observations on marine disposal proposals, including the Applicant's additional submissions on disposal site locations [AS-043]?	The MMO advise that should the material and volume proposed for disposal be deemed acceptable, the MMO would be content that the proposed disposal sites for EA1N and EA2 be included on the face of the DCO/DML. The MMO is of the opinion that the proposed offshore corridor disposal site for EA1N and EA2 would comprise two separate disposal sites due to the overlap with TH057. If disposal of material is required at site TH057, they will also require consent for this site. It is difficult to specify a disposal site code given the overlap between the applicant's proposed corridor disposal sites, but they are likely to be either TH225, TH226 or TH227, however this will be confirmed at the time of characterising the site. Regarding options available to the applicant for this designation, the MMO consider that from the information provided, there seems to be significant overlap between the two, though the Southerly option of EA2 deviates much more from EA1N than the Northerly option. Areas which overlap exactly can be designated as one disposal site, then, another	The Applicants will ensure discussions with the MMO regarding the use of disposal site HU212 (which is already designated for the East Anglia THREE windfarm project) are held to resolve this matter within the Examination period.



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			<p>disposal site could be designated where the areas begin to deviate. However, the MMO see no issue with simply combining both disposal sites into one, thus only requiring two disposal sites for the corridor section in total; split by the overlap with TH057.</p> <p>Regarding the requested EA1N and EA2 Windfarm disposal site (not the area covered by HU212), the MMO would be content for both sites to be included on the face of the DCO/DML so long as the material and volume proposed are deemed acceptable. For EA1N, the disposal site code is likely to be TH025, for EA2 the disposal site codes are likely to be TH021 and TH022, however this will be confirmed at the time of designating the site.</p> <p>Regarding discussions around the use of site HU212 being conducted post -consent (which was suggested by the applicant in their comments to relevant representations), the MMO disagree with the applicant and claim this discussion should not take place during the post -consent stage. An assessment can be made as to the likely behaviour of material that will be disposed by using the anticipated volume, i.e. how material will disperse and whether it will shoal. In cases where the capacity of a disposal site is questionable, further assessment via disposal plume modelling can be conducted to determine the likelihood of adverse effects, the results of which inform the decision as to whether the proposed disposal site is acceptable. The MMO take the view that all the above can be, and usually is, conducted prior to consent being granted, therefore, the applicant's proposal to resolve the concerns post-consent is not consistent with regular practice.</p> <p>It may be possible to confirm the capacity of HU212 postconsent, but this would likely require a licence condition precluding any disposal activities until an assessment is conducted and its results are deemed acceptable. The MMO is content that this process does not raise any immediate concerns but it may be lengthier and costlier, as it will effectively add another step in the regulatory process, i.e. rather than confirming capacity prior to consent being granted, consent would be granted and then a condition would need to be discharged to permit disposal should capacity be confirmed.</p> <p>The MMO will discuss these points with the applicant and provide the ExA with an update in due course after having actioned advice received in September and October.</p>	

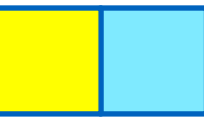


2.10 Other Projects and Proposals

ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
1.14 Other Projects and Proposals				
1.14.1	National Grid Electricity Transmission	<p>1 2 ES Assessment: Infrastructure and Other Users</p> <p>ES Chapter 17 (Infrastructure and Other Users) [APP-065] from paragraph 96 and at Table 17.14 identifies a limited range of range of interactions with other projects raising minor adverse residual impacts in construction and operation and no impact during decommissioning. Consideration is given to EDF energy infrastructure and to subsea cables.</p> <p>a) Is there any need to assess effects on National Grid transmission assets onshore?</p> <p>b) With reference to responses to questions in ExQ1.0 and 1.6 above and the possibility of other grid connections being made at Friston, are there any further interactions that require to be assessed?</p> <p>c) Does the ES conclusion that there are 'no pathways for cumulative impact' in paragraph 96 continue to hold good?</p>	<p>NGET consider the promoter should most appropriately answer these questions as they relate to the promoter's ES assessment work.</p>	No further comments
1.14.2	SCC	<p>1 2 Interface with Sizewell B</p> <p>Are you content that the ES adequately describes and concludes on any interface effects on the Sizewell B nuclear licensed site operations, including emergency planning and on decommissioning</p>	<p><i>SCC Lead Authority - Emergency Planning</i></p> <p>SCC is not content that the ES adequately addresses the issue of interface affects with Sizewell B</p> <p><u>Major Accidents and Disaster Assessment</u></p> <p>The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 introduced the requirement for Major Accidents and Disasters to be considered as part of the EIA process. The Civil Contingencies Act 2004 (Contingency Planning) Regulations 2005 places a duties on Category 1</p>	<p>The Applicants have engaged with the Suffolk Joint Emergency Planning Unit and provided information to allow an assessment of the DCO on existing off-site emergency arrangements made under The Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPIR). The Suffolk Joint Emergency Planning Unit have</p>



ExA. Question Ref.	Question addressed to		ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			activities? If not, please indicate the additional analysis and actions required.	<p>responders, including Suffolk County Council, to assess risks of emergencies, both natural and manmade, and to maintain emergency plans to mitigate, manage and control the effects of such emergencies to protect the public and the environment. There does not appear to be any reference to statutory civil contingency risk information nor has there been any consultation prior to these DCO applications with the Suffolk Local Resilience Forum to understand detailed local risk information and related emergency planning to allow an assessment of vulnerability to take place. There is reference to Control of Major Accident Hazard Regulations, but this is not appropriate in for this development unless the construction site is going to utilise hazardous materials that take operations into lower or upper tier status under these regulations. Accordingly, there is no description of measures to prevent or mitigate the significant adverse effects of such risks on the environment or details of the preparedness for and proposed response to such emergencies. This makes it difficult to understand whether the onshore construction activity has been properly assessed against the pre-existing civil emergency risks or if aspects of the construction activity itself may impact on pre-existing Suffolk emergency response arrangements.</p> <p>Additional requirements are also necessary to protect statutory emergency arrangements:</p> <p>1) No part of the preparation or construction works shall commence until emergency plans relating to these activities have been agreed and issued. Nuclear emergency plans cover the EDF Energy Sizewell B Operators emergency plan and the Suffolk County Council Off Site Emergency Plan issued under Radiation (Emergency Preparedness and Public Information) Regulations 2019. Wider civil contingency arrangements include Suffolk Resilience Forum emergency plans for identified risks issued under the Civil Contingencies Act 2004 that might affect the SPR construction sites and any associated infrastructure.</p> <p>2) The emergency plans shall be carried out as approved in relation to the relevant part of the relevant works, unless otherwise agreed after consultation through the Sizewell Emergency Planning Consultative Committee or Suffolk Resilience Forum as appropriate.</p>	<p>confirmed that provided an appropriate change to the REPPIR off site emergency plan is made and emergency arrangements made by the Applicants are in place prior to any work taking place, the existing off site radiation emergency arrangements for Sizewell B Nuclear Power Station can be adequately maintained. The Suffolk Joint Emergency Planning Unit have requested two requirements be included in the draft DCO (APP-023).</p> <p>The Applicants acknowledge the importance of the Sizewell Off Site Emergency Plan but do not agree with the wording of the proposed Requirement. The Applicants will continue to liaise with the Suffolk Joint Emergency Planning Unit to resolve this matter.</p>
1.14.2	EDF Nuclear Energy Generation Ltd	1	<p>2 Interface with Sizewell B</p> <p>Are you content that the ES adequately describes and concludes on any interface effects on the Sizewell B nuclear licensed site operations, including emergency planning and on decommissioning activities? If not, please indicate the additional analysis and actions required.</p>	<p>We have reviewed whether the ES adequately describes and concludes on the following areas of interface with Sizewell B:</p> <p>Traffic Management</p> <p>Table 2.2 of the Construction Traffic Management Plan recognises that Sizewell B nuclear power station operate regular outages, where the numbers of vehicles travelling to and from Sizewell B increases. To reduce the potential for the construction HGV traffic to have an adverse impact upon the highway network during these times, the CTMP commits SPR to, where possible, schedule peak construction activities to avoid these periods and HGV deliveries will be scheduled to avoid the start and end of shifts. EDF Nuclear Energy Generation Ltd require a commitment within the Construction Traffic Management Plan to consultation with and approval from EDF Nuclear Energy Generation Ltd for the traffic management arrangements during planned outages.</p> <p>Access Points on the Sizewell Gap Road</p> <p>We understand through engagement on the draft SOCG that an Outline Sizewell Gap Construction Works Method Statement will form part of the Code of Construction Practice under Requirement 22 the draft DCO. At this stage there is no reference in the draft DCO to this requirement. We are currently reviewing this Method Statement with a view to agreeing the extent of works in carriageway of the Sizewell Gap Road and traffic management arrangements to ensure that there is uninterrupted access for all types of vehicles (including cyclists and pedestrians) at all times to reduce the potential impact on access to SZB for both operational and emergency purposes.</p> <p>Utilities</p> <p>We request that the applicant confirms whether works have the potential to interrupt services (water, telecommunications, power supply) to SZB and provide the appropriate protective provisions.</p>	<p>Traffic Management</p> <p>The Applicants consider it inappropriate for such a commitment to be included within the draft CTMP. As provided for within the Outline CTMP (APP- 586), the Applicants will engage with EDF Energy to understand the timing of the future outages. Where possible, peak construction activities will be scheduled to avoid these periods and HGV deliveries will be scheduled to avoid the start and end of shifts.</p> <p>Access Points on the Sizewell Gap Road</p> <p>The Applicants will submit an updated draft DCO (APP-023) at Deadline 3 to address this point.</p> <p>Traffic control measures on Sizewell Gap is a matter for the local highway authority and will be controlled under the final CTMP (APP-586) which is secured by the draft DCO (APP-023) and which will require approval of the local highway authority.</p> <p>Utilities</p>



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			<p>Cooling Water Infrastructure</p> <p>The ES states that consideration has been given to the proximity to the Sizewell nuclear power station cooling water infrastructure with respect to tidal streams. This has led to the preference for a location for cable installation towards the southern side of the cable corridor, and an extension of the original corridor further to the south in order to accommodate this. The proposed HDD method and pop-out location reduces the risk of suspended sediment (during construction) affecting the Sizewell Nuclear Power Station's cooling water infrastructure. No significant impact is reported. We would agree with this assessment but would request inclusion of a commitment in the Order to locate the HDD Punch Out in the area shaded blue and referred to as the "Offshore Zone Suitable for HDD Punch Out" in Figure 7.7 of the ES and amendment to draft Requirement 13 to require consultation with EDF Nuclear Energy Generation on the submission of the Landfall Construction Method Statement for the construction of Work No. 6.</p> <p>Flood Risk</p> <p>Cumulative impacts with Sizewell B Power Station Complex were assessed as being not significant. We would agree with this assessment.</p> <p>Emergency Planning</p> <p>There is no reference or assessment in the ES of the potential to exacerbate an emergency incident at Sizewell B in the ES, should works to create the new access points on the Sizewell Gap Road impede or prohibit emergency access to Sizewell B.</p> <p>Whilst we welcome the commitment in the draft DCO (Requirement 33) to prepare an Emergency Incident Response Plan, we would ask for further consideration of the potential effects and clear commitment to engage with EDF Nuclear Energy Generation Ltd in developing the Emergency Incident Response Plan.</p> <p>In addition the Applicants must continue to liaise with the Suffolk Joint Emergency Planning Unit to ensure that appropriate updates are made to the Sizewell Off Site Emergency Plan (prepared by the Suffolk Joint Emergency Planning Unit on behalf of Suffolk County Council / Suffolk Resilience Forum) to accommodate the construction, operation and decommissioning of the Projects.</p> <p>Decommissioning Activities</p> <p>There is no reference in either the screening assessment or the assessment of the cumulative effects to the potential for cumulative effects arising from the proposed development and Sizewell B decommissioning activities. We consider it unlikely that there would be cumulative effects arising from decommissioning, as decommissioning activities are not expected to commence before 2035 and therefore there would be no overlap in construction periods.</p>	<p>The Applicants do not envisage any interruption of services to SZB as a result of the works on Sizewell Gap. The Applicants have included protective provisions within the draft DCO (APP-023) for the protection of utility undertakers in order to protect utilities within the onshore development area.</p> <p>Cooling Water Infrastructure</p> <p>The Landfall Construction Method Statement will require the approval of the local planning authority. The Applicants consider that this provides the necessary controls to ensure the final design of the landfall's trenchless technique is considered to be appropriate.</p> <p>The Coraline Cragg feature will be avoided and the Applicants are considering a punch out exclusion zone which encompasses the Coraline Cragg to secure this. Further information will be provided at Deadline 3</p> <p>Flood Risk</p> <p>No further comments</p> <p>Emergency Planning</p> <p>The Outline Sizewell Gap Construction Method Statement (REP1-041) presents mitigation measures to ensure emergency access to/from the Sizewell B Nuclear Power Station is maintained at all times.</p> <p>The Applicants will consider all relevant information in relation to the preparation of the Projects' Emergency Incident Response Plan, including such information that is publicly available relating to the Sizewell B site (such as the Sizewell Offsite Emergency Plan, produced by the Suffolk Joint Emergency Planning Unit). The Applicants do not consider a formal requirement to consult with Sizewell B to be appropriate.</p> <p>As noted in the SoCG with SZB (REP1-076), the Applicants are discussing this matter with the Suffolk Joint Emergency Planning Unit.</p> <p>Decommissioning Activities</p> <p>No further comments</p>



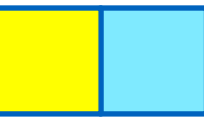
ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
1.14.2	Office for Nuclear Regulation	1 2 Interface with Sizewell B Are you content that the ES adequately describes and concludes on any interface effects on the Sizewell B nuclear licensed site operations, including emergency planning and on decommissioning activities? If not, please indicate the additional analysis and actions required.	ONR is content that the ES adequately describes, and concludes on, any interface effects (including external hazards) on the Sizewell B nuclear licensed site operations. ONR is satisfied that Sizewell B has an ongoing dialogue with the Applicants, and with the Local Authority (responsible for the offsite emergency plan) such that Sizewell B will be in a position to manage any emergent risk from the Projects. ONR does not anticipate any significant impact on decommissioning activities at Sizewell B.	No further comments
1.14.3	SCC	1 2 Interface with Sizewell C Are you content that the ES adequately describes and concludes on any interface effects on the Sizewell C proposed development, including construction, operation (including emergency planning) and decommissioning? If not, please indicate the additional analysis and actions required.	<p>SCC Lead Authority for Emergency Planning – response as above 1.14.2.</p> <p>ESC and SCC Joint Lead - The Sizewell C DCO was accepted by the Planning Inspectorate on 24 June 2020. The Applicants Cumulative Impact Assessments (CIA) in relation to Sizewell C in their ESs is not based on the DCO submission documents. The Councils understand that the Applicants will be submitting clarification notes to the Examining Authority to consider the new information. These updates are in relation to:</p> <ul style="list-style-type: none"> • Traffic and transport • Noise and vibration in relation to traffic and transport • Air Quality • LVIA • Tourism • Bats <p>Once this information has been provided the Councils will review the clarification notes and provide further comments.</p> <p>Please also see answer provided to Question 1.18.58.</p>	<p>The Applicants have submitted a Sizewell C Cumulative Impact Assessment Clarification Note (Traffic and Transport) to the Examination at Deadline 2 (document reference ExA.AS-6.D2.V1). This includes a review and assessment of potential cumulative traffic and transport impacts with Sizewell C, as well as associated potential cumulative noise and vibration and air quality impacts. The Applicants have also submitted an Outline Sizewell Gap Construction Method Statement to the Examinations at Deadline 1 (REP1-041).</p> <p>The Applicants have submitted a Sizewell C Cumulative Impact Assessment Clarification Note (Landscape and Visual) to the Examination at Deadline 2 (document reference ExA.AS-7.D2.V1), which addresses potential cumulative LVIA effects arising between the Projects and Sizewell C.</p> <p>The Applicants have submitted a Socio-Economics and Tourism Clarification Note (SZC CIA) to the Examinations at Deadline 1 (REP1-036).</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 Table 1 of Procedural Decision 18 Applicants' Responses (PDA-001). The outcome of this review did not identify a requirement for the Councils' request for an assessment of cumulative effects of the construction works of the Projects with Sizewell C on bats.</p>



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
1.14.3	NNB Generation (SZC) Ltd	1 2 Interface with Sizewell C Are you content that the ES adequately describes and concludes on any interface effects on the Sizewell C proposed development, including construction, operation (including emergency planning) and decommissioning? If not, please indicate the additional analysis and actions required.	<p>The redline boundary for the offshore works both EA1N and EA2 overlaps with the redline boundary for the Sizewell C Project (Ref. EN010012). This is addressed in the draft SoCG relevant to both EA1N and EA2 between SZC Co. and SPR. SZC Co. understands that EA1N and EA2 have designed in a 500m working corridor that would place the export cables 652m from the Sizewell C headworks. However, it is not clear what works, if any, would occur within this working corridor. SZC Co. seeks protective provisions to ensure that there are no conflicts in the construction, operation and decommissioning phases of all three projects. The establishment of a Harbour Authority for the Sizewell C Project (if consented) would also aid safe operations in the overlap area.</p> <p>The construction and operation of Sizewell C and Sizewell B Relocated Facilities have been considered as cumulative schemes in the EA1N and EA2 Environmental Statements. Significant additional cumulative effects identified within the EA1N and EA2 Environmental Statements with Sizewell C are:</p> <ul style="list-style-type: none"> • Significant landscape and visual effects during the construction phase; • Major beneficial effects for employment; and • Potentially significant transport effects, although these were only considered qualitatively in the EA1N and EA2 Environmental Statements. <p>The cumulative effects assessment undertaken as part of the Sizewell C Environmental Impact Assessment also identified the potential for additional significant cumulative effects with EA1N and EA2, in addition to other schemes. These additional potential significant cumulative effects are:</p> <ul style="list-style-type: none"> • Conventional Waste and Material Resources (Material Requirements) - Significant effect identified; • Socio-economics (Labour Market: supply chain benefits and labour investment) - Moderate beneficial, significant effect at a local scale; • Transport (A12 at Little Glemham and Marlesford) - Potential for cumulative moderate adverse effect on fear and intimidation; • Landscape and Visual (Visual Receptor groups 18, 19 and 20) Major – moderate adverse, significant visual effect (a combination of effects from EA1N, EA2 in addition to Nautilus Interconnector, Eurolink Interconnector, Greater Gabbard extension and Galloper Extension Offshore Wind Farms); • Amenity and Recreation (Visual Receptor groups 19 and 20) - Major – moderate adverse, significant effect (a combination of effects with EA1N, EA2, in addition to Nautilus Interconnector, Eurolink Interconnector, Greater Gabbard extension and Galloper Extension Offshore Wind Farms). <p>On reviewing the respective Environmental Statements, it appears that broadly similar cumulative effects have been identified across the three projects, but recognising that there are different receptor groups for each. The main exception to this is that the potential for cumulative transport effects was not assessed quantitatively in the Environmental Statements for EA1N and EA2.</p> <p>The only additional significant cumulative effect which has a bearing on both schemes is fear and intimidation on the A12 at Little Glemham and Marlesford. Sizewell C are proposing monitoring of construction programmes for Sizewell C Project and EA1N and EA2 through a traffic review group. This is proposed to mitigate the effects on the A12 at Little Glemham and Marlesford. This is to determine if worst case traffic flows are likely to arise. If so, then additional freight management measures are proposed to be agreed with the traffic review group and funded through the transport contingency fund, to be secured through the Section 106 Agreement, as discussed in draft Section 106 Agreement Heads of Terms appended to the Planning Statement (Doc Ref 8.4) for the SZC Project.</p>	<p>The Applicants are discussing the need for Protective Provisions with SZC.</p> <p>Regarding cumulative transport matters, the Applicants will submit a quantitative transport and traffic cumulative impact assessment (document reference ExA.AS-6.D2.V1) at Deadline 2 to reflect SZC traffic data provided within their DCO Application. The Applicants note that they are not party to the Section 106 Agreement or the traffic review group, but will provide details of the EA2 and EA1N actual and forecast vehicle movements to the traffic review group in order to assist SZC's mitigation measures.</p> <p>For the other matters addressed within NNB Generation (SZC) Ltd's response, the Applicants refer to their response to question 1.14.3 in the Applicants' Response to Examining Authority's Written Questions submitted to the Examinations at Deadline 1 (REP1-118).</p>



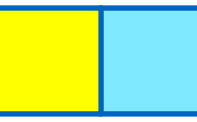
ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
1.14.3	Office for Nuclear Regulation	1 2 Interface with Sizewell C Are you content that the ES adequately describes and concludes on any interface effects on the Sizewell C proposed development, including construction, operation (including emergency planning) and decommissioning? If not, please indicate the additional analysis and actions required.	ONR is content that the ES adequately describes and concludes on any interface effects on the SZC proposed development, and notes that there is on-going dialogue between the Applicant and NNB GenCo (SZC) to develop a separate Statement of Common Ground (SoCG); ONR understands that this includes external hazards to the SZC site arising from the Projects. However, when the SZC site becomes operational, the Local Authority will need to ensure that its Sizewell off-site emergency plan encompasses potential nuclear emergencies arising on the SZC site. That emergency plan will also need to take account of the Applicant's construction project if it is still underway at that time.	No further comments
1.14.4	SCC	2 Interface with nuclear construction, operation and decommissioning at Sizewell Are offshore works prospectively affecting the coralline crag sufficiently clearly described and controlled, given the protection to the Sizewell shore and to the nuclear sites afforded by it? If not, please indicate the additional analysis and actions required.	<i>ESC Lead Authority</i> There is agreement in principle between the Councils and the Applicants on what further investigations are required by them to inform decisions on detailed design matters at the landfall site including the line of HDD seaward of the Transition Bay and the shore break out point location to avoid/minimise to an acceptable level potential disruption to Coralline Crag. The wording of the OCLMS requires the Applicants to submit this outstanding design information for review and approval by ESC. The extent of potential of impact on the Nuclear facilities of the landfall works is very small. The unresolved matters of design will not change this very low level of risk.	Noted. The Applicants submitted an Outline Landfall Construction Method Statement to the Examinations at Deadline 1 (REP1-042). The Applicants will submit an updated draft DCO (APP-023) at Deadline 3. This will amend Requirement 13 of the draft DCO to provide that the landfall construction method statement to be submitted to and approved by the planning authority under Requirement 13 must accord with the OLEMS (APP-584).
1.14.4	NNB Generation (SZC) Ltd	2 Interface with nuclear construction, operation and decommissioning at Sizewell Are offshore works prospectively affecting the coralline crag sufficiently clearly described and controlled, given the protection to the Sizewell shore and to the nuclear sites afforded by it? If not, please indicate the additional analysis and actions required.	The developer has made a commitment to use Horizontal Directional Drill (HDD) to install the cable across near sub-tidal at Thorpeness to avoid impacts to the sediment transport pathway there, particularly in relation to the coralline crag. The developer has provided a map with potential 'punch out' locations that are to the south and west of the coralline crag. This will ensure no physical damage to the crag itself, which acts as a significant hard point for local coastal processes. SZC Co. supports the southern extension to the corridor to accommodate this. Nevertheless, this is still described as a 'preference' and SZC Co. would like to see the avoidance of the surface crag defined as a formal commitment, together with HDD routing and depth designed to minimise any potential physical impact on the subterranean crag through which the HDD may pass and will discuss with the developer how this is secured.	The Applicants have committed to using trenchless techniques, of which HDD is one form. Any other trenchless technique adopted will fall within the assessment envelope presented within the ES. In terms of Requirement 13 of the draft DCO (APP-584), the Landfall Construction Method Statement will require the approval of the relevant planning authority prior to any part of Works Nos 6 or 8 commencing. The Applicants consider that this provides the necessary controls to ensure the final design of the trenchless technique at the landfall is appropriate. The Coralline Crag feature will be avoided and the Applicants are considering a punch out exclusion zone which encompasses the Coralline Crag to secure this. Further information will be provided at Deadline 3.
1.14.4	Office for Nuclear Regulation	2 Interface with nuclear construction, operation and decommissioning at Sizewell	ONR notes that the ES refers to construction activities and the proximity of the coralline crag in several places.	No further comments



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		Are offshore works prospectively affecting the coralline crag sufficiently clearly described and controlled, given the protection to the Sizewell shore and to the nuclear sites afforded by it? If not, please indicate the additional analysis and actions required.	<p>Any possible detrimental effects of the construction activities on the protection of the shoreline near to the Sizewell A, B and C nuclear sites is a matter for Magnox Ltd, EdF and NNB GenCo to consider.</p> <p>Throughout the lifetimes of their plants, ONR will expect Magnox Ltd, EdF and NNB GenCo to take account of any external factors that may have implications for nuclear safety in their safety cases for the Sizewell A, B and C licensed nuclear sites respectively.</p> <p>With regards to Sizewell A ONR would bring to the attention of PINS that there is an expectation under the Infrastructure Planning (Environmental Impact Assessment) Regulations for projects of this nature (i.e. the Projects) that the potential cumulative environmental effects of projects in the surrounding area are considered. In this respect ONR recommend that Magnox Ltd are consulted as the operator of Sizewell A. Furthermore, the Applicant and Magnox Ltd, should consider any interface effects (including external hazards) on the Sizewell A site.</p>	
1.14.5	MMO	<p>1 2 Relevant projects and effects for cumulative impact assessment purposes: grid connections at Friston (OFHs 1 – 3, 7 – 9 October 2020)</p> <p>Parties at OFHs 1 – 3 raised a range of grid connection proposals potentially making use of the National Grid substation proposed to be constructed at Friston. If you have already responded to ExQ1.0 and/ or ExQ1.6 questions on these issues and provided a complete list of projects in response, this question does not need to be responded to. However, if you have not responded to those questions or your response does not include a complete list of projects that you are aware of and consider to be relevant, please set out a full list and identify the public information source(s) from which you have made your assessment.</p>	The MMO has no comment to make.	No further comment
1.14.5	SCC, ESC	<p>1 2 Relevant projects and effects for cumulative impact assessment purposes: grid</p>	<p><i>ESC Lead Authority</i></p> <p>Please also note the response and details in relation to the projects the Councils have provided to 1.0.8.</p> <p>The Councils consider that the cumulative assessments with EA1N and EA2 should consider projects with</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



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<p>connections at Friston (OFHs 1 – 3, 7 – 9 October 2020)</p> <p>Parties at OFHs 1 – 3 raised a range of grid connection proposals potentially making use of the National Grid substation proposed to be constructed at Friston. If you have already responded to ExQ1.0 and/ or ExQ1.6 questions on these issues and provided a complete list of projects in response, this question does not need to be responded to. However, if you have not responded to those questions or your response does not include a complete list of projects that you are aware of and consider to be relevant, please set out a full list and identify the public information source(s) from which you have made your assessment.</p>	<p>connection offers to the National Grid substation proposed at Friston. The cumulative assessment should specifically consider the extensions required to the National Grid substation to accommodate the following project connections:</p> <ul style="list-style-type: none"> • Nautilus Interconnector – Webpage – https://www.nationalgrid.com/group/about-us/what-we-do/national-grid-ventures/interconnectors-connecting-cleaner-future/nautilus <p>Briefing Pack - https://www.nationalgrid.com/document/125601/download</p> <ul style="list-style-type: none"> – FAQ document – Including details of maximum National Grid extension footprint for connection. https://www.nationalgrid.com/document/132456/download • Eurolink Interconnector – Webpage - https://www.nationalgrid.com/our-businesses/national-grid-ventures/interconnectors-connecting-cleaner-future – FAQ document – Including details of maximum National Grid extension footprint for connection. https://www.nationalgrid.com/document/132456/download • Galloper Extension/Five Estuaries Offshore Wind Farm – There is minimal information available in the public domain, but the Councils consider that National Grid could provide details of the land take required to connect a 353MW capacity offshore wind project to the National Grid substation. <p>The Councils maintain that as the National Grid substation is being considered as a strategic connection point for multiple projects, the effects of these connections on the design of the National Grid substation and associated impacts should be fully considered.</p>	<p>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"> • Nautilus; • EuroLink; • Greater Gabbard Offshore Windfarm Extension; and • Galloper Offshore Windfarm Extension. <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>
1.14.5	SASES	<p>1 2 Relevant projects and effects for cumulative impact assessment purposes: grid connections at Friston (OFHs 1 – 3, 7 – 9 October 2020)</p> <p>Parties at OFHs 1 – 3 raised a range of grid connection proposals potentially making use of the National Grid substation proposed to be constructed at Friston. If you have already responded to ExQ1.0 and/ or ExQ1.6 questions on these issues and provided a complete</p>	Please see SASES WR Cumulative Impact Assessment	The Applicants' note the written representation made by SASES regarding cumulative impact assessment and will respond at Deadline 3.



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2																																																
		<p>list of projects in response, this question does not need to be responded to. However, if you have not responded to those questions or your response does not include a complete list of projects that you are aware of and consider to be relevant, please set out a full list and identify the public information source(s) from which you have made your assessment.</p>																																																		
1.14.5	Save our Sandlings	<p>1 2 Relevant projects and effects for cumulative impact assessment purposes: grid connections at Friston (OFHs 1 – 3, 7 – 9 October 2020)</p> <p>Parties at OFHs 1 – 3 raised a range of grid connection proposals potentially making use of the National Grid substation proposed to be constructed at Friston. If you have already responded to ExQ1.0 and/ or ExQ1.6 questions on these issues and provided a complete list of projects in response, this question does not need to be responded to. However, if you have not responded to those questions or your response does not include a complete list of projects that you are aware of and consider to be relevant, please set out a full list and identify the public information source(s) from which you have made your assessment.</p>	<p>Significant projects in the Sizewell Area</p> <table border="1"> <thead> <tr> <th>Project</th> <th>Consultation</th> <th>Start Date</th> <th>Finish Date</th> </tr> </thead> <tbody> <tr> <td>• EdF Sizewell C Stage 3 consultation</td> <td>Jan 2019 ⁱ completed</td> <td>2022</td> <td>2035 ?</td> </tr> <tr> <td>• EdF Sizewell B building relocation / Carpark creation</td> <td>Jan 2019 ⁱⁱ completed</td> <td>2021</td> <td>2022</td> </tr> <tr> <td>• ScottishPower EA1N</td> <td>Feb 2019 completed</td> <td>2024</td> <td>2028 ⁱⁱⁱ</td> </tr> <tr> <td>• ScottishPower EA2</td> <td>Feb 2019 completed</td> <td>2024</td> <td>2028</td> </tr> <tr> <td>• National Grid Ventures - Nautilus</td> <td>2021 ?</td> <td>?</td> <td>2027</td> </tr> <tr> <td>• National Grid Ventures - Eurolink</td> <td>2021 ?</td> <td>?</td> <td>2030</td> </tr> <tr> <td>• Greater Gabbard Windfarm extension (North Falls)^{7 8 9}</td> <td>? ^{iv}</td> <td>2025?</td> <td>2031 ?</td> </tr> <tr> <td>• Galloper Windfarm extension (Five Esturies)</td> <td>? ⁴</td> <td>2025?</td> <td>2031 ?</td> </tr> <tr> <td>• National Grid reductoring of 400Kv overhead lines</td> <td></td> <td>?</td> <td>2027</td> </tr> <tr> <td>• National Grid Interconnector Sizewell to Kent SCD1^{10 11 12}</td> <td></td> <td></td> <td>2028</td> </tr> <tr> <td>• National Grid Interconnector Sizewell to Kent SCD2</td> <td></td> <td></td> <td>?</td> </tr> </tbody> </table> <p>Source: National Grid COIN Process Connection Assessment Note</p> <p>ⁱ DCO submitted but changes submitted to Traffic and Transport Sept/Oct 2020 –further consultation needed ⁱⁱ Subject to judicial Review Oct 2020 ⁱⁱⁱ Assuming scenario One EA2 and EA1N simultaneous otherwise EA1N will start after EA2 completed ^{iv} RWE/SSE consortium established Sept 2020. No consultation dates identified –likely in the next 5 – 10 yrs</p> <p>The above projects are in addition to 3 completed major projects in Sizewell area since the early 2000's namely: a) Greater Gabbard Offshore windfarm b) Galloper Offshore windfarm c) EdF Nuclear Dry Fuel Store</p>	Project	Consultation	Start Date	Finish Date	• EdF Sizewell C Stage 3 consultation	Jan 2019 ⁱ completed	2022	2035 ?	• EdF Sizewell B building relocation / Carpark creation	Jan 2019 ⁱⁱ completed	2021	2022	• ScottishPower EA1N	Feb 2019 completed	2024	2028 ⁱⁱⁱ	• ScottishPower EA2	Feb 2019 completed	2024	2028	• National Grid Ventures - Nautilus	2021 ?	?	2027	• National Grid Ventures - Eurolink	2021 ?	?	2030	• Greater Gabbard Windfarm extension (North Falls) ^{7 8 9}	? ^{iv}	2025?	2031 ?	• Galloper Windfarm extension (Five Esturies)	? ⁴	2025?	2031 ?	• National Grid reductoring of 400Kv overhead lines		?	2027	• National Grid Interconnector Sizewell to Kent SCD1 ^{10 11 12}			2028	• National Grid Interconnector Sizewell to Kent SCD2			?	Please refer to the Applicants response to Question 1.14.5 within Applicants' Response to Examining Authority's Written Question (REP1-118) and the below response to SEAS.
Project	Consultation	Start Date	Finish Date																																																	
• EdF Sizewell C Stage 3 consultation	Jan 2019 ⁱ completed	2022	2035 ?																																																	
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ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<p>assessment purposes: grid connections at Friston (OFHs 1 – 3, 7 – 9 October 2020)</p> <p>Parties at OFHs 1 – 3 raised a range of grid connection proposals potentially making use of the National Grid substation proposed to be constructed at Friston. If you have already responded to ExQ1.0 and/ or ExQ1.6 questions on these issues and provided a complete list of projects in response, this question does not need to be responded to. However, if you have not responded to those questions or your response does not include a complete list of projects that you are aware of and consider to be relevant, please set out a full list and identify the public information source(s) from which you have made your assessment.</p>	<p>Future planned energy projects connecting to the National Grid in the Sizewell/Friston area of Suffolk Eight Offshore Wind Energy Projects are widely believed to be planned to connect to the National Grid at Friston. (This does not include future windfarm projects as a result of the seabed leases awarded by the Crown Estate in relation to the Round 4 process). Cumulative impact means eight substations and interconnectors constructed sequentially or consecutively. Plus, the addition of a nuclear power station, one of the largest in the world. This will be the largest complex of energy infrastructure in the U.K. situated in one of the most fragile ecosystems in the U.K. These are judged to be ill-conceived plans where the process of choosing the site for the mega infrastructure hub is shown to be flawed. There are a number of better alternative brownfield sites for this designated vast complex.</p> <p>1. East Anglia One North Offshore Windfarm - ScottishPower Renewables - Projected to be completed in 2028</p> <p>An offshore wind farm which could consist of up to 67 turbines, generators and associated infrastructure, with an installed capacity of up to 800MW, located 36km from Lowestoft and 42km from Southwold. From landfall the cables will be routed underground to an onshore substation at Friston, which will in turn connect into the national electricity grid via a National Grid substation and cable sealing end compounds, the latter to be owned and operated by National Grid.</p> <p>2. East Anglia Two Offshore Windfarm - ScottishPower Renewables - Projected to be completed in 2028</p> <p>An offshore wind farm which could consist of up to 75 turbines, generators and associated infrastructure, with an installed capacity of up to 900MW, located 37km from Lowestoft and 32km from Southwold. From landfall, the cables will be routed underground to an onshore substation at Friston which will in turn connect into the national electricity grid via a National Grid substation and cable sealing end compounds, the latter to be owned and operated by National Grid.</p> <p>3. Nautilus - National Grid Ventures - Construction 2025-2028</p> <p>The Nautilus Interconnector is a proposed second Interconnector between East Suffolk and Belgium. It would create a new 1.4 gigawatts (GW) high voltage direct current (HVDC) electricity link. The project would involve the construction of a converter station in each country and the installation of offshore and onshore underground direct current cables (HVDC) between each converter station and underground alternating current cables (HVAC) between the converter station and substation in each country. In the UK, the offer from National Grid Electricity Transmission (NGET) allows for a connection at a new 400kV substation located close to the Sizewell 400kV network, provisionally referred to as 'Leiston 400kV'. The current NGET substation location being promoted is less than ten kilometres from the coast, i.e. Friston.</p> <p>4. EuroLink - National Grid Ventures - Construction by 2030</p> <p>EuroLink is a proposal to build a High Voltage Direct Current (HVDC) transmission cable between Suffolk and the Netherlands. The capacity of the link will be 1400MW. The proposals are to follow the same path as Nautilus (see above), i.e. Friston.</p> <p>5. Greater Gabbard Windfarm Extension (North Falls Offshore Wind Farm) - SSE Renewables and RWE Renewables - Construction 2025 - 2030</p> <p>The North Falls Offshore Wind Farm will comprise a number of wind turbines on fixed foundations, plus dedicated offshore and onshore electrical infrastructure. The newly-signed lease agreement is for an additional capacity of 504MW, the same as the existing Greater Gabbard Offshore Wind Farm. "it will comprise wind turbines and their associated foundations, array cables which will connect the turbines to an offshore substation, export cables which will transmit the power from the offshore substation to shore, onshore cables and an onshore substation. National Grid has not completed its technical and environmental studies so no conclusion has been made about the location of the onshore grid connection at this stage. National Grid has not completed its technical and environmental studies so no conclusion has been made</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"> • Nautilus; • EuroLink; • Greater Gabbard Offshore Windfarm Extension; and • Galloper Offshore Windfarm Extension. <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><u>Sizewell C</u></p> <p>New information on the construction of SZC is considered in the cumulative impact assessment clarification notes which have been submitted at Deadline 1 and Deadline 2. These notes cover the following topics:</p> <ul style="list-style-type: none"> • Traffic and Transport (submitted at Deadline 2, document reference ExA.AS-6.D2.V1)



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			<p>about the location of the onshore grid connection at this stage". It is widely believed that National Grid will seek to use the Friston site.</p> <p>6. Galloper Windfarm Extension (Five Estuaries Offshore Wind Farm) - RWE Renewables - Construction by 2030</p> <p>Five Estuaries is an offshore wind farm to generate in excess of 300MW. The project consists of (but is not limited to): an offshore wind farm, including wind turbine generators and associated foundations and array cables; transmission infrastructure, including offshore substations and associated foundations, offshore and onshore export cables (underground), including associated transition bays and jointing bays, an onshore substation, and connection infrastructure into the National Grid. It is widely believed that National Grid will seek to use the Friston site.</p> <p>7. SCD1 - National Grid ESO - Construction by 2028</p> <p>SCD1 consists of constructing a 2GW offshore HVDC link and associated substation works between Suffolk and Kent. This project appears to have been sanctioned without it going through the DCO process. "Preliminary work to identify the optimal connection substations at both ends is ongoing". It is widely believed that National Grid ESO will seek to use the Friston site.</p> <p>8. SCD2 - National Grid ESO - Construction by 2029</p> <p>SCD2 consists of a second 2GW offshore HVDC link with associated substation works connecting Suffolk and Kent. This project is currently on 'hold' which means that it is considered optimal but delivery of this option should be delayed by at least one year. Again, it is widely believed that once sanctioned, National Grid ESO will seek to use the Friston site.</p> <p>In addition, there is Sizewell C Nuclear Power Station - EDF - Construction 2022 - 2034 A New Nuclear Power Station on a 33 ha. site near Sizewell. Two EPR reactors will generate 3.34 GW of electricity with 4 on-site pylons connecting cables to a National Grid Substation.</p>	<ul style="list-style-type: none"> including a supplementary cumulative traffic assessment taking into account SZC; and updates in respect of: Noise and Vibration (including health and wellbeing); and Air Quality. LVIA (submitted at Deadline 2, document reference ExA.AS-7.D2.V1) including relevant updates in respect of Amenity and Recreation. Socio-Economics and Tourism (submitted at Deadline 1 (REP1-036))
1.14.6	MMO	1 2	<p>Relevant projects and effects for cumulative impact assessment purposes: other projects</p> <p>Are there any other projects that are not documented in the ES and are not grid connection projects at Friston (ExQ1.14.5) that are relevant and need to be considered by the ExA?</p> <p>Please identify these projects and identify the public information source(s) from which you have made your assessment that they are relevant.</p>	<p>The MMO has no comment to make.</p> <p>No further comment</p>
1.14.6	ESC	1 2	<p>Relevant projects and effects for cumulative impact assessment purposes: other projects</p> <p><u>ESC Lead Authority</u></p> <p><u>EA3 Offshore Windfarm</u></p> <p>Iberdrola, parent company to ScottishPower Renewables (SPR) has confirmed their intention to</p>	<p>Please see Applicants' comments on responses to WQ 1.14.5 above. No further comments.</p>



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		<p>Are there any other projects that are not documented in the ES and are not grid connection projects at Friston (ExQ1.14.5) that are relevant and need to be considered by the ExA?</p> <p>Please identify these projects and identify the public information source(s) from which you have made your assessment that they are relevant.</p>	<p>combine EA1N, EA2 and EA3 into one single delivery programme creating the East Anglia Hub (https://www.iberdrola.com/about-us/lines-business/flagship-projects/east-anglia-hub-offshore-wind-complex).</p> <p>EA3 was consented in 2017 and comprises a 1.4GW offshore wind project. Landfall is at Bawdsey with a 37km cable route across to a substation at Bramford. The ducting for EA3 has been laid under the EA1 DCO consent.</p> <p>Sizewell C New Nuclear Power Station</p> <p>The Applicants have included the Sizewell C DCO in their ESs, however the information assessed within the CIA is based on the material EDF Energy published during the pre-application stage. The Applicants have committed to further assessing the cumulative impacts of the projects with Sizewell C now that additional information is available following submission of the Sizewell C DCO for examination. This further assessment is currently outstanding.</p> <p>The Sizewell C DCO submission documentation is available on the National Infrastructure Planning website https://infrastructure.planninginspectorate.gov.uk/projects/east-em/the-sizewell-c-project/</p> <p>Projects for the Examining Authority to be aware of but the Councils consider there is insufficient information available at present for their inclusion in a cumulative impact assessment:</p> <p><u>Greater Gabbard Extension/North Fall Offshore Windfarm</u> If a connection offer is provided for the</p> <p>Greater Gabbard Extension/North Falls Offshore Wind Farm at Friston during the examination period, the consequence of this should be considered at this stage. Public information regarding the North Falls project is available from their website https://www.northfallsoffshore.com/. The Councils recognise that without a confirmed point of connection it would not be reasonable to ask the Applicants to consider this project in a cumulative assessment at the present time.</p> <p><u>SCD1 Link</u></p> <p>The NG-ESO Network Options Assessment January 2020 have recommended some network reinforcements as being necessary, including a subsea HVDC link between Sizewell and Canterbury (https://www.nationalgrideso.com/document/162356/download). National Grid Electricity Transmission (NGET) has confirmed that they will be taking forward this reinforcement suggestion within their Network Policy Decisions June 2020 (https://www.nationalgrid.com/uk/electricity-transmission/document/134036/download). There is insufficient information available at the present time to require the Applicants to include this project within their cumulative assessment. The Councils however wanted to bring this to the Examining Authority's attention, should further information be made available during the examination.</p>	
1.14.6	NNB Generation (SZC) Ltd	1 2 Relevant projects and effects for cumulative impact assessment purposes: other projects Are there any other projects that are not documented in the ES and are not grid connection projects at Friston (ExQ1.14.5)	<p>SZC Co. considered the assessment of cumulative effects with EA1N and EA2 as well as a number of additional schemes. These schemes are detailed within the 'Short List' of cumulative schemes, Vol 10. Chapter 1 Appendix 1B of the Sizewell C Environmental Statement (https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010012/EN010012-002192SZC_Bk6_ES_V10_Ch1_EIA_Methodology_Appx1A_Long_List_1B_Short_list.pdf).</p> <p>These schemes were identified through planning portal searches and liaison with Suffolk County Council and East Suffolk Council. Examples of schemes considered include Nautilus Interconnector, Eurolink Interconnector, Greater Gabbard Offshore Wind Farm (OWF) extension, Galloper OWF Extension and a</p>	<p>Within the ES, the Applicants considered cumulative impacts with SZC where reliable information was available within the SZC Stage 4 consultation.</p> <p>The Applicants note the Socio-Economics and Tourism Clarification Note (REP1-036) submitted to the Examinations at Deadline 1 provided further consideration of cumulative</p>



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2																		
		<p>that are relevant and need to be considered by the ExA?</p> <ul style="list-style-type: none"> Please identify these projects and identify the public information source(s) from which you have made your assessment that they are relevant. 	<p>number of housing schemes in the area. Further detail is available in the short list of schemes, including links to planning portal pages, where relevant. Some of the short-listed schemes in the Sizewell C assessment may not be relevant to the EA1N and EA2 assessments.</p> <p>It is not clear at this stage whether these additional cumulative schemes have been considered within the cumulative assessments for EA1N and EA2. It appears that additional cumulative schemes and some topic assessments of Sizewell C have been scoped out of the EA1N and EA2 assessments. Given that the SZC application has now been submitted the full suite of environmental information is now available, should it need to be drawn upon.</p>	<p>impacts arising between the Projects and Sizewell C.</p> <p>The Applicants have submitted a quantitative transport and traffic cumulative impact assessment Sizewell C Cumulative Impact Assessment Note (Traffic and Transport) (document reference ExA.AS-6.D2.V1) and landscape and visual cumulative impact assessment Sizewell C Cumulative Impact Assessment Note (Landscape and Visual) (document reference ExA.AS-7.D2.V1) at Deadline 2 to reflect SZC data provided within their DCO Application.</p>																		
1.14.6	SASES	<p>1 2 Relevant projects and effects for cumulative impact assessment purposes: other projects</p> <p>Are there any other projects that are not documented in the ES and are not grid connection projects at Friston (ExQ1.14.5) that are relevant and need to be considered by the ExA?</p> <p>Please identify these projects and identify the public information source(s) from which you have made your assessment that they are relevant.</p>	Please see SASES WR Cumulative Impact Assessment	The Applicants' note the written representation made by SASES regarding cumulative impact assessment and will respond at Deadline 3.																		
1.14.6	Save our Sandlings	<p>1 2 Relevant projects and effects for cumulative impact assessment purposes: other projects</p> <p>Are there any other projects that are not documented in the ES and are not grid connection projects at Friston (ExQ1.14.5) that are relevant and need to be considered by the ExA?</p> <p>Please identify these projects and identify the public information source(s) from which</p>	<p>The area is also witnessing significant housebuilding programs in Leiston, Aldringham, Thorpeness, Saxmundham, Wickham Market and Woodbridge and most significantly at Martlesham, Ipswich (i.e., towns along the A12 corridor) with the accompanying HGV / LGV and contractor vehicles. These programs also necessitate substantial road closures, diversions and restrictions as new services are connected to these projects.</p> <table border="1"> <thead> <tr> <th>Application ref.</th> <th>Description</th> <th>Road affected</th> </tr> </thead> <tbody> <tr> <td>DC/20/3906/AME</td> <td>Johnsons Farm 187 dwellings</td> <td>B1119</td> </tr> <tr> <td>DC/20/3285/CWH</td> <td>40 dwellings</td> <td>B1122</td> </tr> <tr> <td>DC/20/1233/VOC</td> <td>Martlesham Heath 2000 dwellings</td> <td>A12</td> </tr> <tr> <td>DC/20/2678/DRC</td> <td>180 dwellings</td> <td>A12</td> </tr> <tr> <td>DC/20/3361/FUL</td> <td>Pettistree/Wickham Market 129 dwellings</td> <td>A12</td> </tr> </tbody> </table> <p>Source: East Suffolk Planning applications</p> <p>Of all of the above new house build programs, the 2000 new homes at Martlesham Heath to the east of BT Adastral Park, Ipswich will have the most significant direct impact on the A12. Already experiencing high road use at each end of the day with the existing large housing estate to the west, and BT Research and light industrial enterprises to the east, and a major Tesco supermarket between, road traffic is heavy at all</p>	Application ref.	Description	Road affected	DC/20/3906/AME	Johnsons Farm 187 dwellings	B1119	DC/20/3285/CWH	40 dwellings	B1122	DC/20/1233/VOC	Martlesham Heath 2000 dwellings	A12	DC/20/2678/DRC	180 dwellings	A12	DC/20/3361/FUL	Pettistree/Wickham Market 129 dwellings	A12	Please see Applicants' comments on responses to WQ 1.14.5 above. The Applicants understand that the Martlesham Heath development has had outline planning permission since 2018 and will be completed before the proposed start date for the Projects of 2023
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		<p>you have made your assessment that they are relevant.</p>	<p>times during the working day. Access/egress from these two areas is via 2 roundabouts. Plans have been submitted to establish an additional roundabout with associated slip roads onto the A12 south of the two existing roundabouts. Construction of these will naturally cause further disruption to traffic flow. The A12 is the main trunk road to North Suffolk and Lowestoft and Great Yarmouth for road going freight, connecting with the A14 at Seven Hills, South of Ipswich and is popular with holiday makers and tourists travelling north and south for most months of the year.</p> <p>The A12 north of Woodbridge is a mixture of dual and single carriageway, mostly single, leading to long tailbacks throughout the day, especially during summer, Bank Holidays, half-term and warm sunny week-ends. Additional slower moving HGV project traffic sharing road space with caravans and motorhomes will further increase the tailbacks and gridlock. The 2 SPR projects combined with the construction traffic for Sizewell C will undoubtedly place a huge strain on the road network leading to road users exploring alternative unsuitable rural routes and 'rat runs' to get around the problem</p> <p>Improvements to this section of the A12, (the Four Villages Bypass) have been shelved for very many years and the road network is struggling to cope with the existing traffic volume let alone future demand, especially following the surge in housebuilding along this major road, and more families move away from large towns and cities to sample the rural lifestyle. We have become victims of our own success in promoting Suffolk as a nice place to live. More information on Suffolk Roads studies can be found here:</p> <p>https://www.suffolk.gov.uk/roads-and-transport/transport-planning/consultations-and-studies/ See Suffolk Energy Gateway and https://roadtrafficstats.uk/traffic-statistics-suffolk-a12-kelsale-cum-carlton-48586#.X5laJUdxcUQ A12, Kelsale cum Carlton, Suffolk (census between A1094 and A1120)</p> <p>There are plans for a two villages bypass only, Farnham and Stratford St. Andrew, 2 adjoining villages just south of the A1094, partially funded by EdF as mitigation for Sizewell C. East Suffolk Council and EdF are reluctant to provide sufficient funds for all four villages, and inward government investment has been refused. There is also an ongoing rolling programme of broadband network improvement for rural Suffolk communities with accompanying restrictions and closures on all of the road network as work progresses. Diversions of many miles are not an uncommon feature of road closures leading to high volumes of traffic travelling along narrow and/or usually very quiet roads.</p> <p>Additional links EADT Energy Impact rethink call EADT Dr Therese Coffey MP - windpower - nuclear projects impact meeting</p>	
1.14.6	SEAS	<p>Relevant projects and effects for cumulative impact assessment purposes: other projects</p> <p>Are there any other projects that are not documented in the ES and are not grid connection projects at Friston (ExQ1.14.5) that are relevant and need to be considered by the ExA?</p> <p>Please identify these projects and identify the public information source(s) from which</p>	<p>Summary</p> <p>The Northern part of the A12 is the main arterial road between the Ports of Felixstowe and Lowestoft where most construction materials arrive for new infrastructure in East Suffolk. The A12 is a dangerous road, the section between Ipswich and Lowestoft was de-trunked in 2001 and therefore passed control over from Highways England to Suffolk County Council, and is why this section is primarily single carriageway and poorly invested in, therefore the A12 has only now been labelled as a main trunk road between Brentwood and Ipswich with the Northern half after the A14 being deemed a non-primary extension, and a lesser important road. 1 Along this poorly equipped road are many impending infrastructure projects, such as major road junction alterations at Martlesham and Woodbridge, 2000 new homes at Adastral Park, Park and Rides at Wickham Market and Darsham, a new bridge in Lowestoft and, after Brexit, increased trade at Felixstowe Container Port. Even with the addition of widened roads and new junctions, the heavy construction traffic associated with Sizewell C and SPR's two projects at Friston will only serve to bring everything to a standstill, not to mention what will happen with the other projects mentioned in EXQ1 - 1.14.5 The basic problem of course is that a rural County like Suffolk does not have an infrastructure capable of supporting the level of building and heavy construction suggested and the traditional 'industries' like agriculture, tourism and fishing will unfortunately become the casualties.</p>	<p>Since submission of the Applications, the Applicants have been progressing discussions with the Councils regarding the traffic and transport assessment and on mitigation proposals in order to provide more detail and certainty over these proposals.</p> <p>To inform the SoCG process a series of clarification notes regarding Traffic and Transport have been / are being prepared. Traffic and Transport: Deadline 1 Clarification Note (ExA.AS-8.D1.V1) has been submitted to the Examination at Deadline 1.</p> <p>A clarification note on potential cumulative effects with Sizewell C is being prepared has been submitted at this Deadline, Sizewell C</p>



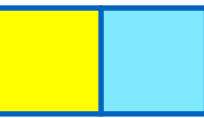
ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<p>you have made your assessment that they are relevant.</p>	<p>2. Port of Felixstowe</p> <p>The Port of Felixstowe is Britain's biggest and busiest container port, and one of the largest in Europe.² The port handles more than 4million TEUs (Twenty-foot Equivalent Units) and welcomes approximately 3,000 ships each year, including the largest container vessels afloat today – crucially, the port provides some of the deepest water close to the open sea of any European port. Around 17 shipping lines operate from Felixstowe, offering 33 services to and from over 700 ports around the world.</p> <p>2. Port of Felixstowe</p> <p>The Port of Felixstowe is Britain's biggest and busiest container port, and one of the largest in Europe.² The port handles more than 4million TEUs (Twenty-foot Equivalent Units) and welcomes approximately 3,000 ships each year, including the largest container vessels afloat today – crucially, the port provides some of the deepest water close to the open sea of any European port. Around 17 shipping lines operate from Felixstowe, offering 33 services to and from over 700 ports around the world.</p> <p>SEAS comment: Much of the Construction Materials for the Energy projects connecting to Friston and for Sizewell C will come through Felixstowe. Increases of trade will surely translate into an increase in traffic to and from the port, making use of the A14 and A12. The Orwell Bridge on the A14 is the only access for HGVs to get onto the A12 North or South. Should the bridge be shut (as can be the case) for any reason (high winds, accidents), the tail backs can be for many miles. The only other route to join the A12 is through the town of Ipswich which can become grid locked for hours.</p> <p>3. East Suffolk Housing Development:</p> <p>"We will aim to maintain a rolling 3-year plan of realistic development opportunities which will include enough sites to meet the HRA (Housing Revenue Account) Business Plan projection of 50+ units a year. We seek to identify a pipeline of sites looking forward 3 years which will include undertaking strategic reviews of areas where there are significant Council land holdings. We will also seek to provide homes for shared ownership (a form of low-cost home ownership). The Council's Strategic Housing Market Assessment report has identified of all the homes required by 2036 the need for this type of tenure is not insignificant (9% within the former Waveney area and 7% within the former Suffolk Coastal area).</p> <p>Our own shared ownership units will help meet this need and will attract grant funding from Homes England as well as helping to cross subsidise the rented housing being provided by us. We have received funding from Homes England's SOAHP programme (2016-21) to build a small number of shared ownership homes over the next 3 years to 2021 ensuring a range of housing solutions are provided for our local communities. Our new homes programme within the HRA is budgeted to deliver 257 new affordable homes by 2022/23.5 Plans to create 187 new homes in Leiston are one step closer to being built after the development site was acquired by a housebuilder (Persimmon Homes). Outline planning permission for sites on Abbey Road and St Margarets Crescent, which would see the construction of 100 and 77 homes respectively, have been granted but no work has yet begun.⁶ Suffolk Coastal needs to deliver 10,476 homes by 2036 at a rate of 582 a year; Waveney needs to deliver 8,223 at a yearly rate of 374."</p> <p>4. Martlesham Housing Project:</p> <p>Brightwell Lakes will consist of 2,000 homes, including affordable homes and accommodation for elderly people, off the A12 at Adastral Park.⁸ There will be four points of access from the A12, Ipswich Road and the Northern Quadrant of Adastral Park.</p> <p>5. Road Improvements to accommodate Martlesham Housing Project</p>	<p>CIA (Traffic and Transport) Clarification Note (document reference ExA.AS-6.D2.V1). A further Traffic and Transport Note will be provided at Deadline 3.</p> <p>The Applicants provided responses to written questions from the Examining Authority at Deadline 1, specific responses regarding traffic and transport can be found in Applicants' Responses to Examining Authority's Written Questions (REP1-121).</p> <p>The Outline Access Management Plan (APP-587), Outline Construction Traffic Management Plan (APP-586), and Outline Travel Plan (APP-588), will be updated and submitted into Examination at Deadline 3. In addition, an Outline Port Travel Plan will be submitted at Deadline 3. Requirement 36 of the draft DCO (APP-023) requires a Port Travel Plan (PTP) to be submitted to and approved by the relevant planning authority in consultation with the relevant highway authority.</p> <p>The Applicants understand that the Martlesham Heath development has had outline planning permission since 2018 and will be completed before the proposed start date for the Projects of 2023</p>



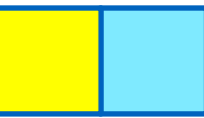
ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			<p>Investment to A12 / Main Road Roundabout to improve capacity and safety (specific upgrade TBC) Martlesham Industrial Park access to receive. £2M investment to incorporate smart traffic signal access/ egress onto the A12. This new facility will equalise the priority of movements and relieve pressure on local roads. Discussions are ongoing with Suffolk County Council to determine what improvements within the Industrial Park are possible. £2M Investment to Adastral Park Roundabout to convert into traffic signal crossroads. £2M Investment to Foxhall Roundabout to convert into traffic signal crossroads.</p> <p>The masterplan includes: A range of up to 2,000 new homes • A primary local centre, centrally located and overlooking the lake, including a range of shops, community, food and drink uses • A secondary local centre, so that all residents can walk to a local shop • A new all through school, catering for children ages 3-18 • A new healthcare facility • A community centre • Small extension to the Brightwell Barns employment area for local businesses • A variety of walking and cycling routes including those for dog walkers (the longest of the on-site routes is 7km) • Generous buffer planting around northern / eastern / southern edges (approximately 20m in width) to screen new development and protect views and setting of surrounding landscape. • 34 hectares of accessible green space, including playing pitches, woodland, grassland, heathland, beach and picnic area, play areas for all ages and trim trail; • Allotments / community orchards</p> <p>Collisions and fatalities: "In the four years to 2019 there were over 150 people killed in crashes on Suffolk roads and over 1,200 people in Suffolk were seriously injured. The majority of these were clustered around towns and villages – that is 40mph roads or less."- Councillor Robert Lindsay, transport spokesman for the Liberal Democrats.</p> <p>Construction traffic will all be funnelled through Martlesham, Woodbridge, Marlesford, Little Glemham, Stratford St Andrew, Farnham and Snape as they make their way along the A12 and the A1094. Along this route the speed limit changes in the following order: 70mph, 40mph, 30mph, 50mph, 30mph, 50mph, 40mph, 30mph, 60mph before reaching the B1069 junction (Black Heath Corner). This spectrum signals the essential rural nature of a landscape dotted with villages and highlights the inadequacy of the road to support mass industrial projects.</p> <p>6. EDF's Park and Ride Scheme</p> <p>EDF has proposed two Park and Ride projects for workers traveling to and from the Sizewell C site: one in Wickham Market/Hacheston and another in Darsham. Under the proposals the Wickham Market/Hacheston site would have parking for around 1,250 cars, 10 buses or vans, 80 motorcycles and 20 cycles. When construction work is at its peak the site would be running for seven days a week. Once the site is no longer needed EDF propose that it would be removed.</p> <p>7. EDF's A12 Bypass:</p> <p>A12 – "we have developed our proposals for mitigating traffic impact at Farnham and now have four options: no change; widening the road at the Farnham bend; a one-village bypass of Farnham; or a two-village bypass of Farnham and Stratford St Andrew (at the request of Suffolk County Council).¹² However, residents of Wickham Market have stated in a survey "their overwhelming preference for a four villages bypass to the north of Wickham Market" instead of simply the two-village bypass currently proposed by EDF. – Central Suffolk and north Ipswich MP Dr Dan Poulter. 83% stating that they were worried about the extra traffic the site would bring".</p> <p>8. Lowestoft and Great Yarmouth enterprise zone</p> <p>In August 2011 the New Anglia Local Enterprise Partnership (NALEP) bid to create one of the UK's 21 enterprise zones in Lowestoft and Great Yarmouth was accepted by Government. This offers Lowestoft and Great Yarmouth to make the most of opportunities presented by the growing offshore wind industry, delivering jobs and regeneration to the two towns. Key facts</p>	



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			<ul style="list-style-type: none"> • Energy is the key economic sector for the enterprise zone. • The enterprise zone is made up of six sites; two in Great Yarmouth, three in Lowestoft and one in Beccles. • These sites will benefit from a business rate discount for eligible businesses for five years, simplified planning procedures and greater Government support for high speed broadband. • 9,000 new jobs are forecast for the Enterprise Zone by 2025, with a further 4,500 indirect jobs created, helping to reduce local unemployment <p>9. Gull Wing Crossing Lowestoft</p> <p>Construction work is scheduled to begin in the spring of 2021, with the bridge opening in the summer of 2023. The Gull Wing will be Suffolk's most significant infrastructure development in years and is one of several substantial projects set to transform Lowestoft. Farrans has now been unveiled as the winning contractor, with the £76m contract to commence later this year. The bridge will be Lowestoft's third crossing over Lake Lothing.</p> <p>10. Lowestoft Port Energy Hub</p> <p>"We expect the concept of an Energy Hub to be realised in the next few years • Whilst clearly still at a formative stage, an architect's impression of the development is provided at Figure 18. The former Shell Base site on Shell Quay at the western end of the Inner Harbour is an ideal location, with large developable areas and quayside frontage suitable for offshore wind support vessel berthing. Demolition of the existing buildings with a view to preparing the required development land has already commenced. • The relatively shallow water depths in this part of the harbour do not represent a constraint for CTVs and, depending on customer demand and requirements, finger pontoons may be installed to facilitate loading/ unloading operations. • We believe the Port will provide an attractive location for (amongst others) wind farm construction/ O&M coordination facilities and/or supply chain activities."</p> <p>SEAS Comment: Essentially much infrastructure work will be carried out on the port itself in the coming years, necessitating access for construction vehicles along the A12. An 'Energy hub' will require major work and this will be taking place concurrently with EA1N/2 plans.</p> <p>11. East Anglia 3 (EA3)</p> <p>ScottishPower Renewables announced that EA3 windfarm is likely to be built at the same time as EA1N and EA2. The applicant has not taken into consideration the possible transport issues associated with EA3.</p> <p>12. Other Projects Cumulative Impact</p> <p>The traffic associated with the thousands of new homes will fill the roads irrespective of the proposed road improvements at Martlesham and Woodbridge. The additional heavy construction traffic associated with the Sizewell C and SPR and National Grid projects at Friston, will only serve to bring everything to a standstill. This in turn will negatively affect agriculture and tourism which will be vitally important once the power generation projects have been completed as they will only offer a low number of job opportunities once they are up and running.</p> <p>The Application does not address many of these 'other projects.' They need to be taken into consideration along with all the Energy Projects potentially linking to the National Grid substation at Friston – ExQ1 – 1.14.6.</p> <p>Given the above and the Government's intention to continue with offshore wind power on an ever-increasing scale, it is even more vital that attention is also given to creating onshore substation and converter hubs in easily accessible brownfield sites that have modern, purpose-built highways to accommodate their</p>	

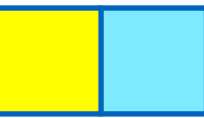


ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			construction and future development. A joined up offshore and onshore structure in order to prevent more and more land in this region being taken to support an industry of "independent" power projects.	



2.11 Seascape, landscape and Visual Amenity

ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
1.16 Seascape, Landscape and Visual Amenity				
1.16.3	Natural England	<p>2 Visual effects of turbines</p> <p>Detailed analysis of the visible height of offshore wind turbines is provided by yourselves to the ExAs ([RR-059], Appendices E, Section 2).</p> <p>The ExA also note the detailed responses of the Applicants to this analysis in their response to the RRs [AS-036] and their view that there are limitations to the analysis presented and that the apparent height of the Project 300m turbines will only be greater than that of the existing offshore windfarms in views from northern parts of the seascape setting of the AONB.</p> <p>•Respond to this analysis of your comments, should you wish to do so</p>	Natural England has provided further advice at Deadline 1 response Appendix E1b on SLVIA.	The Applicants have responded to NE's Appendix E1b at Deadline 2, within the Applicants' Comments on Natural England's Deadline 1 Submissions (document reference ExA.AS-10.D2.V1).
1.16.4	Natural England	<p>2 Good design: seascape</p> <p>Natural England (NE) consider that after reviewing Chapters 3 and 6 of the ES [RR-059] they are unable to find a direct reference to how the proposal will achieve 'good design'. NE note that the revised layout design would add some embedded mitigation in the form of reduced lateral spread and note the role of the site selection process and the operation of navigational lighting in minimising landscape and visual effects. However, despite this, it considers that significant detrimental landscape and visual effects are still predicted for the scheme, principally as a result of technology choice selected for use in the worst-case scenario: i.e. 300m high turbines.</p> <p>NE request further information on the decisions which have led to the selection of 300m turbines, in particular in the portion closest to the coast of the AONB.</p> <p>Due to the technology choice selected for use in the worst case scenario, and reflecting that smaller turbines are available, NE considers that the NPS requirements for 'good design' have not yet been fully applied in the design of the EA2 scheme, and that as a consequence the statutory purpose of the AONB will be adversely effected by the EA2 proposal as it is currently configured.</p> <p>The ExA notes the detailed responses of the Applicant to this point of view in their responses to the RRs [AS-036]. The Applicant considers that the mitigation of a reduced windfarm site area has regard to the statutory purposes of the AONB and demonstrates good design in respect of landscape and visual amenity, given the various siting, operational, and other relevant constraints. The ExA also notes the commitment to provide further information in justification of the decisions which have led to the selection of 300m turbines.</p>	Natural England has provided further advice at Deadline 1 response Appendix E1b on SLVIA.	The Applicants have responded to NE's Appendix E1b at Deadline 2, within the Applicants' Comments on Natural England's Deadline 1 Submissions (document reference ExA.AS-10.D2.V1).



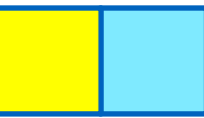
ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<p>To Natural England:</p> <p>a) Please provide any further responses considered necessary in response to the Applicant's comments. Do you remain of the view that the NPS requirements for good design have not been met in the design of the EA2 scheme, and if so, why is that and what additional mitigation is required?</p> <p>To the Applicant:</p> <p>b) Provide further justification for the selection of 300m turbines, in particular in the portion of the array closest to the coast of the AONB, with reference made as to how the requirement of good design in the NPS has been met</p>		
1.16.5	Natural England	<p>1 2 Visibility</p> <p>Concerns are raised over some of the text used in the ES [APP-076] (Chapter 28.3 Para. 16 and 17, 6.5.15, and Appendix 28.8 Para. 5 and 6), noting that expected periods of 'very good' and 'excellent' visibility occur most frequently during the summer, when outdoor recreational activity in the AONB is also at its peak. It is stated that GLVIA 3 makes no reference to the frequency of when 'very good' or 'excellent' conditions need to exist in order to define the worst-case scenario, and that as a result frequency is not a critical factor in judging the significance of effect, and you advise therefore that the statement contained in the first sentence of 28.8 para. 6 is discounted as it is not a factor in judging significance. The ExAs note the detailed responses of the Applicants to this point in their responses to the RRs [AS-036].</p> <ul style="list-style-type: none"> Respond to the above comments of the applicant and make any further comments if necessary. 	Natural England has provided further advice at Deadline 1 response Appendix E1b on SLVIA.	The Applicants have responded to NE's Appendix E1b at Deadline 2, within the Applicants' Comments on Natural England's Deadline 1 Submissions (document reference ExA.AS-10.D2.V1).
1.16.6	Natural England	<p>1 2 Turbine height and visibility</p> <p>With reference to Appendix 28.8 Para. 8 and 12, you note [RR-059] that a report from 2012 is cited, but that in 2011/2012 there were no windfarms located in the English Channel, and that the maximum height of the turbines included in the study quoted is 153m, whereas the turbines used in the worst case realistic scenario are 147m taller. You also note that the research is helpful in framing discussion about visibility and separation distances for turbines up to 153m but it makes no reference to the AOD height of the observer, and that it does not assist in judging the significant effect for visual receptors located within designated landscapes and should therefore be treated with caution and not considered within any determination.</p> <p>The ExA note the detailed responses of the Applicants to this point in their responses to the RRs [AS-036], including the statement that the limitations of this research article is recognised in the SLVIA and the supplied copy of 'Offshore Wind Turbine Visibility and Visual Impact Threshold Distances' (2012) [AS-044].</p> <ul style="list-style-type: none"> Provide any further comments in response to the 	Natural England has provided further advice at Deadline 1 response Appendix E1b on SLVIA.	The Applicants have responded to NE's Appendix E1b at Deadline 2, within the Applicants' Comments on Natural England's Deadline 1 Submissions (document reference ExA.AS-10.D2.V1).



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1.16.7	Natural England	<p>applicants, should you wish to do so.</p> <p>2 Increased distance from shore With reference to para 42 of Chapter 28 of the ES, the ExA note that you welcome the increase in the minimum separation distance to 32.6km and the increase in separation distance from the coast at viewpoints 3, 4, 5 and 6 and note the decrease in separation distance for viewpoints 7, 8, 9, 10, 11, 12, 13 and 18. You note that based on these 12 locations the average separation distance for this section of the AONB coastline remains unchanged at 34.5km and conclude therefore that the revised design provides no embedded mitigation in terms of proximity to the coast of the AONB nor in the height of the turbines used in the worst-case scenario, and consider that the magnitude of this effect remains the same as that for the scheme design presented in the PEIR, due to the height of the turbines used in the worst case scenario that has led to some landscape and visual effects being identified for receptors located in the northern portion of the AONB. The ExA note the response of the Applicant [AS-036], stating that there has been no reduction of the minimum separation distance between the PEIR windfarm site and the ES windfarm site and providing a revised Table 28.3 to replace that provided in the ES. The Applicant also reasons that the revised design does provide embedded mitigation in terms of proximity to the coast, given that there is an increased separation from northern viewpoints and no decrease in separation distance for southern viewpoints.</p> <ul style="list-style-type: none"> Respond to the comments of the Applicant, should you wish to do so. Are your content with the revised Table 28.3? 	Natural England has provided further advice at Deadline 1 response Appendix E1b on SLVIA.	The Applicants have responded to NE's Appendix E1b at Deadline 2, within the Applicants' Comments on Natural England's Deadline 1 Submissions (document reference ExA.AS-10.D2.V1).
1.16.8	Natural England	<p>1 2 Night-time effects Natural England note that at ES Chapter 28, section 28.3.3 para. 42 [APP- 076] embedded mitigation measures include the fitting of 'aviation warning lights to significant peripheral wind turbines and will allow for reduction in lighting intensity at and below the horizon when visibility from every wind turbine is more than 5km', and presume therefore that the worst case scenario would be that illustrated in figure 28.28g where 2000 candela lights are shown.</p> <p>NE are unsure as to why the assessment of night-time effects has been restricted to Landscape Character Type 25, which only affects the urban areas of Southwold and Aldeburgh. They note that dark skies are an important component of the special qualities of the AONB and consider that it is clear from ES figures 28.28g and 28.37f that the aviation navigational lighting proposed has the potential to adversely affect dark skies. NE state that their experience of other offshore wind farms suggests that aviation navigational lighting is a conspicuous feature when viewed from the shore and that atmospheric conditions, such as sea fog, can amplify the adverse effect as aviation navigational lights flash in sequence.</p>	Natural England has provided further advice at Deadline 1 response Appendix E1b on SLVIA.	The Applicants have responded to NE's Appendix E1b at Deadline 2, within the Applicants' Comments on Natural England's Deadline 1 Submissions (document reference ExA.AS-10.D2.V1).



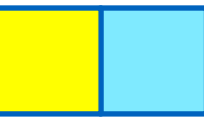
ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<p>NE wish to see an assessment of the effects of navigational lighting on night-time skies, based upon the worst case scenario for the use of navigational lighting, for LCT 05 Coastal Dunes and Shingle Ridges (Area C), LCT 06 Coastal Levels (Area B and D), LCT 07 Estate Sandlands (Areas A and C), and LCT 29 Covehithe Broad and Easton Broad.</p> <p>NE also request that a visual assessment is undertaken for the receptor group 'beach users' from the viewpoints located within the relevant LCTs namely, viewpoints 03, 04, 06, 07, 08, 09, 11, 12 and 18.</p> <p>The ExA note the detailed responses of the Applicants to this point in their responses to the RRs [AS-036] and their view that the proposed aviation lighting will not have significant effects on the perception of landscape character, which is not readily perceived at night in darkness, particularly in rural areas.</p> <p>To the Applicant:</p> <p>a) Confirm whether you propose to submit the assessments requested by Natural England</p> <p>b) Explain how are aviation lights controlled and dimmed to 200cd (when visibility conditions permit)? How could this be secured through the DCO?</p> <p>To Natural England:</p> <p>c) Respond to the comments of the applicants, should you wish to do so, including on their view that landscape character is not readily perceived at night due to the level of darkness, particularly in rural areas and their view that dark skies are not described as a particularly important component of the special qualities of the AONB.</p>		
1.16.9	Natural England	<p>1 2 AONB Baseline</p> <p>You note that you do not understand the relevance of ES Chapter 28, section 28.5.4 [APP-076], stating that the aims and objectives of the AONB Management Plan focus on the conservation and enhancement of the natural beauty of the designation and help guide future development. In response the applicants consider that it is a requirement of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 to provide a description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution of that baseline without implementation of the development and this section addresses this requirement.</p> <ul style="list-style-type: none"> Respond to the above comments, should you wish to do so, including an opinion on the weight that should be given to the objectives of the AONB management plan. 	Natural England has provided further advice at Deadline 1 response Appendix E1b on SLVIA.	The Applicants have responded to NE's Appendix E1b at Deadline 2, within the Applicants' Comments on Natural England's Deadline 1 Submissions (document reference ExA.AS-10.D2.V1).



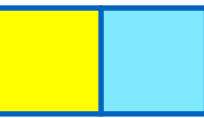
ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
1.16.10	Natural England	<p>2 Seascape baseline Concerns are raised by yourselves over the conclusions drawn in ES [APP-076], (Chapter 28, section 28.5.4, paragraph 142), considering that while the seascape covered by the study (and the wider seascape of the southern North Sea) is increasingly characterised by the presence of a number of large offshore windfarms it is incorrect to assume that the acceptable landscape and seascape change which this has produced sets a precedent for EA2. The ExA note the response of the Applicant to this point in their responses to the RRs [AS- 036] and their justification that the text of the ES does not explicitly state that the Project is acceptable in the context of the evolving seascape baseline, merely that it fits with the overall approach of 'accommodation' of wind energy development in this seascape. The applicant goes on to state that the reduced windfarm site area has regard to the statutory purposes of the AONB and demonstrates good design in respect of landscape and visual amenity, given the various siting, operational, and other relevant constraints.</p> <ul style="list-style-type: none"> Respond to the response of the Applicant, should you wish to do so. Can you provide further guidance as to how you wish to see the Applicant consider the objectives of the AONB in their assessment? 	Natural England has provided further advice at Deadline 1 response Appendix E1b on SLVIA.	The Applicants have responded to NE's Appendix E1b at Deadline 2, within the Applicants' Comments on Natural England's Deadline 1 Submissions (document reference ExA.AS-10.D2.V1).
1.16.11	Natural England	<p>2 Seascape Character Assessment You state that for the s42 consultation you requested that maintenance activities associated with the operational phase of the proposed development are incorporated into the seascape assessment, but that you could not find evidence that this has been done. The ExA note the responses of the applicant to this point in their responses to the RRs [AS- 036] and their justification that maintenance activities have been incorporated into the SLVIA.</p> <ul style="list-style-type: none"> Respond to the above comments should you wish to do so. 	Please see NE Deadline 1 response Appendix E1b on SLVIA.	The Applicants have responded to NE's Appendix E1b at Deadline 2, within the Applicants' Comments on Natural England's Deadline 1 Submissions (document reference ExA.AS-10.D2.V1).
1.16.12	Natural England	<p>2 Landscape Receptors Natural England [RR-059] disagree with the conclusions of no likely significant effects for the construction and operational phases of the proposed development for LCT 06 Areas B and D and advise that there will be a likely significant adverse effect on LCT 29 which has not been assessed in the ES. The ExA note the responses of the applicant to this point in their responses to the RRs [AS-036], where after further field work they maintain their assessment of the relevant LCT areas and consider that the effect on LCT 29 is not</p>	Natural England has provided further advice at Deadline 1 response Appendix E1b on SLVIA.	The Applicants have responded to NE's Appendix E1b at Deadline 2, within the Applicants' Comments on Natural England's Deadline 1 Submissions (document reference ExA.AS-10.D2.V1).



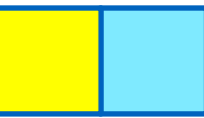
ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<p>significant.</p> <p>To the Applicant:</p> <p>a) How 'large' is the part of LCT 06 Area B which extends to the coast at Sole Bay, in area terms (e.g. m2) or as a percentage of the overall size of Area B?</p> <p>b) With regard to LCT 06 Area D Natural England refer to the long distance and panoramic views out to the seaward horizon, as opposed to direct views. Do you wish to add to your comments on this aspect with regard to any effect on this LCT; could you confirm if this has been considered in the assessment?</p> <p>To Natural England:</p> <p>c) Respond to the rebuttal of the applicant [AS-036], should you wish to do so, including on any effect on LCT 29.</p>		
1.16.13	Natural England	<p>2 AONB Special Qualities</p> <p>NE disagree [RR-059] with the conclusions of the ES Chapter 28 in relation to the following special qualities of the AONB: Influence of Incongruous features (Landscape Quality); Appeal to the senses – Sensory stimuli and 'big Suffolk skies' (Scenic Quality); Sense of Remoteness – pockets of relative wildness and largely undeveloped countryside, and Sense of passing time and return to nature (all Relative Wildness); and Distractors from tranquillity (Relative Tranquillity) [Table 28.10, APP-076].</p> <p>For all such categories NE disagree with the magnitude of change judgment of medium-low, considering the change to be at least medium and that the significance of effect should be concluded as significant.</p> <p>In terms of Landscape Quality NE note that the northern section of the seascape setting of the AONB is currently free of fixed man-made features, and consider that the introduction of wind turbines into this seascape "can only spread the influence of such incongruous features into an otherwise naturalistic vista.". They also note that while the claim that turbines may also be seen to represent the visual aesthetic of green / sustainable energy which may be perceived as having positive visual associations with the natural environment may reflect the opinion of some people it should have no bearing on the determination of the scheme.</p>	<p>Natural England has provided further advice at Deadline 1 response Appendix E1b on SLVIA.</p>	<p>The Applicants have responded to NE's Appendix E1b at Deadline 2, within the Applicants' Comments on Natural England's Deadline 1 Submissions (document reference ExA.AS-10.D2.V1).</p>



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<p>In terms of Scenic Quality NE note that Big Suffolk skies do not stop at the coastline, but extend out over the sea and contribute to the natural beauty of the designation and that at night, in the northern section of the AONB, such skies are free of fixed marine lighting and this, combined with the generally unlit coastline, allows for extensive areas of the dark night sky to be experienced. NE consider that the safety and navigation lighting associated with each turbine will detract from these dark skies by providing points of fixed lighting which, in the case of the aviation lighting will also flash. This lighting will extend out over a considerable distance.</p> <p>While NE appreciate that in the southern portion of the AONB the 'big Suffolk skies' which extend out to sea are already influenced by the navigation lighting from existing windfarms and coastal shipping they state that the influence of marine traffic on the seascape setting of the AONB is less pronounced in the northern portion and consider that extending the influence of fixed marine lighting into the northern portion will therefore result in the loss of this important characteristic in this part of the seascape setting of the AONB and further note that big Suffolk skies contribute to the 'sense of openness and exposure'(under the Relative Wildness special quality) which has been judged to be adversely effected by EA2.</p> <p>For relative wildness, NE note that this special quality is particularly associated with the undeveloped sections of the coastline in the northern portions of the AONB, where built development along the coastline is well confined and with the exception of Sizewell Nuclear Power station of a small scale; both in terms of height and lateral spread along the coast, with very few buildings extending above two storeys in height. They consider that the wind turbines of EA2 will detract from this special quality in this area due to their apparent size and, to a lesser extent, lateral spread. They are also of the view that they are also likely to lessen the experience of relative wildness through the introduction of incongruous made-man features into an otherwise undeveloped seascape and advise that the significant adverse landscape and visual effects resulting from the construction and operation of EA2 will not contribute to the sense that nature is returning to the AONB.</p> <p>In terms of relative tranquillity, NE are of the view that the opportunity to experience tranquillity in a naturalistic environment is influenced by many Factors, including</p>		



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<p>seeing offshore wind turbines. They consider the turbines of EA2, as defined in the ES, will act as a significant detractors for the northern portion of the AONB, and that in certain locations, such as beaches of Covehithe and Minsmere, the presence of these structures in the seascape will significantly reduce the opportunity to experience relative tranquillity in this part of the AONB.</p> <p>The ExA note the detailed responses of the applicants to this point in their responses to the RRs [AS-036]. In essence they maintain the conclusions of effects as outlined in the SLVIA.</p> <p>To the Applicant:</p> <p>a) The existing 'incongruous features' in the northern AONB are largely land based. Has the Applicant considered whether the proposal would have more of an effect by positioning incongruous features into a largely open seascape?</p> <p>In your response concerning Scenic Quality you state that "visible aviation lighting of existing wind turbines has been recorded as being clearly visible from night-time viewpoints as far north as Aldeburgh during the SLVIA." (AS-036 page 441, 1st para).</p> <p>b) How does this tally with your responses above (referenced within question 1.17.8) to night-time effects of the proposal?</p> <p>On page 441 of AS-036 you state that "there are several coastal areas of the AONB that have brighter night lights, particularly around the main towns at Kessingland Beach, Southwold, Sizewell, Leiston, Thorpeness and Aldeburgh".</p> <p>c) Would/do lights from Leiston have an effect on views from the coastline?</p> <p>d) Kessingland Beach, Thorpeness and Sizewell do not appear to the ExA to be towns. Would lighting at smaller settlements have the same effect on the dark skies on the AONB at night as a town?</p> <p>It is stated that "While dark skies may therefore be valued by people viewing the night-sky, they do not in themselves 'contribute to natural beauty', as an assessment of the special qualities of a designated landscape cannot be made at night-time during the dark.</p>		



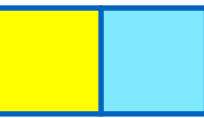
ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<p>e) Does a dark sky contribute to the special qualities of a designated landscape? One argument could be that the light of the moon in a sky largely unaffected by artificial light could increase the natural beauty of a designated landscape at night-time, and add to other qualities such as solitude and tranquillity.</p> <p>To Natural England:</p> <p>f) Should you wish to do so, respond to the detailed comments of the Applicant, including (but not limited to) their view expressed of page 446 of their response [AS-036] that you have incorrectly identified the AONB special quality of Relative Wildness</p>		
1.16.14	Natural England	<p>2 Viewpoints and Visual Receptors NE disagree with the conclusions of the ES and consider that the significance of effects for beach users and walkers on the Suffolk Coastal Path at Viewpoint 10 (Sizewell Beach) and visitors/tourists at Viewpoint 18 (Orford Ness) should be concluded as adverse [RR-059]. In relation to Sizewell Beach, NE consider that there is no justification in lowering the sensitivity of beach users and walkers on the premise that the presence of Sizewell nuclear power station would reduce their expectations, and hence the sensitivity, of these groups. They note that it could be argued that the opportunity to experience an open undeveloped seascape, as an alternative to the nuclear power station, means that such views are valued more by these receptor groups at this location.</p> <p>For Orford Ness, NE's concerns remain in relation to the cumulative effect of Greater Gabbard plus Galloper offshore wind farm arrays plus EA2, considering that this would be contrary to the statutory purposes of the AONB as these structures would be seen to dominate views out to sea (from the northeast through to south east) thereby detracting from the natural beauty afforded by this location. NE disagree that the vertical height of the turbines will be relatively moderate in scale and that they will appear similar in height to the Galloper turbines considering that the EA2 turbines are likely to appear taller than the Galloper turbines by a factor of 1.239 or around 24% taller.</p> <p>NE also disagree that the existence of the Galloper and Greater Gabbard offshore wind farm arrays provides justification for the EA2 application, agreeing that EA2 would not form an entirely new type of visible development but would be seen in the context of existing wind turbines on the horizon and result in a northerly extension to this influence; however, noting</p>	Natural England has provided further advice at Deadline 1 response Appendix E1b on SLVIA.	The Applicants have responded to NE's Appendix E1b at Deadline 2, within the Applicants' Comments on Natural England's Deadline 1 Submissions (document reference ExA.AS-10.D2.V1).



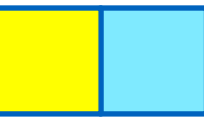
ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<p>that this northerly extension will be a significant increase in the space occupied (from 22% to 37%) and use turbines which are and will appear substantially taller.</p> <p>The ExA note the responses of the Applicant to this point of view in their responses to the RRs [AS-036], where they maintain their conclusion that the effect of the project upon visitors to be not significant.</p> <p>To the Applicant:</p> <p>a) Could an argument be made that an open undeveloped seascape 'opposite' to Sizewell power station would have a more significant effect on beach users and walkers, as a direct contrast to the power station?</p> <p>b) Would the addition of the proposed EA2 offshore wind farm array to the existing views of wind turbines at Orford Ness lead to a higher cumulative effect on receptors, reducing the amount of overall undeveloped seascape?</p> <p>To Natural England:</p> <p>c) Respond to the comments of the applicant [AS-036] on this matter if you wish to do so.</p>		
1.16.15	Natural England	<p>2 Suffolk Coastal Path</p> <p>The ExA note that you disagree with the judgement of 'no significant effects' as set out for Section 7, Minsmere and Sizewell, considering that ES Chapter 28 figure 28.23b clearly shows that for a significant section of the path within this section, EA2 will be visible, with the predicted number of blade tips being visible in the banding being 51 to 60.</p> <p>The ExA note the responses of the Applicant to this point in their response to the RRs [AS- 036], where they maintain their conclusion that the effect of the project upon walkers on the SCP between Minsmere and Sizewell is 'not significant'.</p> <p>a) Respond to the comments of the Applicant [AS-036] if you wish to do so.</p> <p>b) If you maintain your position that the effect is significant, please provide a view about any additional mitigation that might be required.</p>	Natural England has provided further advice at Deadline 1 response Appendix E1b on SLVIA. In relation to mitigation we will wait for the Applicant to provide further information on this matter.	The Applicants have responded to NE's Appendix E1b at Deadline 2, within the Applicants' Comments on Natural England's Deadline 1 Submissions (document reference ExA.AS-10.D2.V1).
1.16.16	Natural England	<p>1 2 Cumulative Effects</p> <p>NE recognise that the contribution that EA1N makes to identified cumulative effects in Chapter 28, section 28.9 of the ES (Tables 28.14, 28.15 and 28.17) [APP-076] is small, but advises that opportunities should be sought to reduce this contribution as far is possible within the design envelope of the proposed development. In particular, NE note that the use of lower turbines (250m) for the EA1N project would assist in reducing the cumulative effects predicted in both the EA2 and EA1N</p>	Natural England has provided further advice at Deadline 1 response Appendix E1b on SLVIA.	The Applicants have responded to NE's Appendix E1b at Deadline 2, within the Applicants' Comments on Natural England's Deadline 1 Submissions (document reference ExA.AS-10.D2.V1).



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<p>ES SLVIA. They state that the possibility of taking this approach should be explored, so that further embedded mitigation is introduced into the design of EA1N to help reduce the adverse cumulative effects predicted, and suggest that the use of shorter turbines (250m) at the western edge of the EA1N development area is likely (based upon the apparent height measurements provided above) to assist in reducing the significant cumulative effects predicted in the EA2 and EA1N ES SLVIAs.</p> <p>The ExA note the responses of the Applicant to this point in their responses to the RRs [AS-036], where they consider that since there is agreement that the effects of the EA1N project alone are not significant, further mitigation of the turbine height for EA1N as a contribution towards cumulative impact mitigation is not required.</p> <p>To the Applicant:</p> <p>a) The response by NE refers to cumulative effects, rather than just the effects of EA1N. Would the use of 250m turbines reduce such cumulative effects?</p> <p>To NE:</p> <p>b) Respond to the comments of the Applicant [AS-036], should you wish to do so.</p>		
1.16.17	SCC, ESC	<p>1 2 Cumulative Effects</p> <p>SCC and ESC consider that cumulative effects and the visual effects of EA2 alone will result in significant adverse landscape and long term adverse visual effects on the Suffolk Coast, including on the character and special qualities of the Suffolk Coast and Heaths AONB. Given the sensitivity and designation of seascape and landscape, in the view of the Councils the applicants have not demonstrably exhausted all reasonable mitigation measures in terms of design of scheme, including the proposed height of turbines.</p> <p>In response, the Applicant notes that the geographic extent of EA2 has been reduced and that they have demonstrated an ongoing commitment to reducing visual effects on the Suffolk coast [AS-036].</p> <p>To the Applicant:</p> <p>a) Could you elaborate on the statement "[t]he height of the wind turbines is dependent on multiple factors and requires balance between engineering constraints, environmental impacts and commercial viability"?</p>	<p><i>ESC Lead Authority</i></p> <p>Notwithstanding the height reduction and layout changes of the turbines offered to date, EA2 will continue to produce significant adverse impacts on the AONB that could be overcome by further modification of the scheme, such as a further reduction in the height of the turbines or layout modifications. We recognise that such modifications may have significant commercial impacts.</p> <p>However, given its proximity to the Suffolk Coast and Heaths AONB, all options should be considered to ensure that the scheme is designed to avoid significant adverse impacts upon the AONB. In terms of the precise height and layout that would achieve such an acceptable scheme, we defer to Natural England on this matter and will be guided by them.</p>	<p>The Applicants refer to their response to Q1.16.17 in Applicants' Responses to Examining Authority's Written Questions (REP1-119) submitted at Deadline 1.</p>



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<p>To SCC, ESC:</p> <p>b) Respond to the above comments of the Applicant in their responses [AS-036], should you wish to do so.</p>		
1.16.18	Natural England	<p>1 2 Summary and Conclusions</p> <p>Various comments are made by yourselves regarding the Summary and Conclusions within the ES, including being unsure of the point that Para. 331 is seeking to make, the incompleteness of some of the statements in the 2nd, 3rd, 4th and 5th bullet points of paragraph 340 and disagreement with the conclusion of the final sentence as set out at the 7th bullet point, advising that the special qualities of the AONB will be adversely effected by the scheme.</p> <p>The ExA notes the responses of the Applicant to this point of view in their responses to the RRs [AS-036], where they provide rebuttals to the above points.</p> <ul style="list-style-type: none"> Respond to the Applicant's responses to your points, should you wish to do so. 	Natural England has provided further advice at Deadline 1 response Appendix E1b on SLVIA.	The Applicants have responded to NE's Appendix E1b at Deadline 2, within the Applicants' Comments on Natural England's Deadline 1 Submissions (document reference ExA.AS-10.D2.V1).



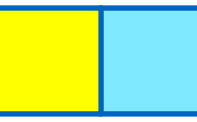
2.12 Socio Economic Effects

ExA. Question to Ref.	Question addressed	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
1.17 Socio-Economic Effects				
1.17.5	SCC, ESC	<p>1 2</p> <p>Memorandum of Understanding (MoU) A MoU is discussed to ensure a commitment for local authorities and the applicant to maximise education, skills and economic benefits of the projects. Such a MoU is welcomed by SCC.</p> <p>a) How would such an MoU be enacted, and would it be binding?</p> <p>b) Have means of securing it directly (through for example discharge of a requirement or conclusion of a Planning Obligation under the Town and Country Planning Act 1990) been considered and would they be necessary?</p> <p>Please update the ExA on the progress of the MoU. Have the New Anglia Local Enterprise Partnership been involved?</p>	<p><i>SCC Lead Authority</i></p> <p>Response to a)</p> <p>The Memorandum of Understanding (MoU) establishes a commitment between SPR both as a developer and as a significant regional employer to work with the Councils to maximise the education, skills and economic benefits of the SPR's East Anglia Offshore Wind Projects.</p> <p>The MoU is not binding and relies upon the positive relationships that have been built between both parties since socio-economic work began on EA1 over 5 years ago.</p> <p>Response to b)</p> <p>We did consider all means of securing the commitments made in the MoU. However, we did not deem this necessary or achievable. We have had a positive relationship with SPR since the introduction of a Skills, Education and Employment MoU for EA3. Working with SPR outside of the formal planning process has promoted a collaborative relationship and we believe that we have achieved far more working together using the MoU than we did under the EA1 skills plan that was secured through the DCO.</p> <p>Through the MOU SPR have been able to enhance and enrich existing regional projects and priorities. The flexible nature of this process means that as our regional objectives change, as they have done with the challenges of Covid-19 recently, SPR are able to adapt and flex their support to ensure it is still relevant.</p> <p>Response to c)</p> <p>The NALEP are not a named signatory on the MoU. However, as we have said above, SPR work to enhance and enrich current and future regional objectives. These objectives derive from the wider strategic plans, such as the Norfolk & Suffolk Local Industrial Strategy, Energy Sector Skills Plan etc. These strategic plans involve input from many stakeholders not least NALEP.</p> <p>Positive progress continues with SPR, this is in the process of being formalised through regular diarised meetings of officers reporting against a standing agenda alongside biannual meetings as set out in the MoU.</p>	<p>The Applicants welcomes the positive progress which has been made through the MoU. The Applicants refer to their response to Q1.17.5 in Applicants' Responses to Examining Authority's Written (REP1-120) submitted at Deadline 1.</p> <p>ScottishPower supports the Government's Wind Sector Deal through its ongoing commitment to investment in UK offshore wind. The Sector Deal will attract more businesses to join the offshore wind supply chain, thus helping to create a sustainable industry. The recently published "Norfolk and Suffolk Offshore Wind Cluster" report by the New Anglia LEP (2019) also depicts how the opportunities presented by the Offshore Wind Sector Deal have stimulated local partnerships to develop a collective vision for the future.</p>



2.13 Transportation and Traffic

ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2	
1.18 Transportation and Traffic					
General					
1.18.3	SCC	1 2	<p>As highway authority you raise concerns in your RR [RR-007] about the following matters: - abnormal loads; - the mitigation measures proposed at the A12/A1094 Friday Street junction (40mph speed limit southbound on A12, rumble strips, repositioning of speed camera– a new roundabout is suggested); the lack of planning obligations; cumulative impacts; the scoping out of operations, maintenance and decommissioning activities; traffic movements; mitigation compromising other schemes eg Sizewell C; and Protective Provisions for SCC access as highway authority for inspection and maintenance.</p> <p>Please expand on these concerns as they relate to highways:</p> <p>a) giving more detail; b) explaining why and how they are attributable to each of the proposed projects; and specifying what in your view remains outstanding.</p>	<p>SCC Lead Authority - Highways</p> <p>Abnormal Loads</p> <p>The Applicants have not addressed how large loads will access the substation site after completion. While the Department for Transport (DfT) have published a preferred route to Sizewell from Lowestoft this does not extend as far as Friston. Routing Abnormal Indivisible Loads (AILs) through Leiston contradicts the management of Heavy Goods Vehicles (HGVs) that are prevented to do so. It is also noted that the acquisition of land to facilitate AILs to use the A1094/B1069 junction is temporary and no permanent highway rights accrue.</p> <p>SCC considers that apart for the cost of any initial scoping meeting, consultancy services connected with the movement of AIL's within the County, the acquisition of data, specifications and technical approval for the commission noted above, to be outside the remit of our normal abnormal load management responsibilities, so would ask that our costs be reimbursed accordingly.</p> <p>Mitigation Measures at A12/A1094 Friday Street</p> <p>In summary, the DCO submissions set out that the Applicants' position was that, with management of the traffic of their employees and their proposed mitigation, their impacts at the junction are reduced from major adverse to minor adverse, which they consider to be acceptable. The Applicants also reach this conclusion for Scenario 1. The highway authority does not agree with this conclusion.</p> <p>The junction already has an existing high standard of signing including a speed enforcement camera, a reduced speed limit of 50mph and the visibility exceeds national guidance. The Councils are concerned about the effectiveness of the current speed limit as significant numbers (on average 1,711 annually over the last nine years) are still recorded by the enforcement camera as exceeding 50mph (note the camera is only present part of the year).</p> <p>The junction has a history of collisions, most notably relating to right turning vehicle movements across the A12 and it is reasonable to assume that the proposed developments will further exacerbate these issues given the increase of right turn movements from A12 south to the A1094 for either project individually, with a peak daily increase of approximately 105 HGVs right turning at this location, as well as the light vehicles associated with staff. As set out by the Applicants within their DCO submissions, the proposed increased use risks a greater frequency and severity of collisions to the extent that it requires mitigation. The assessed increase in construction vehicle traffic is during the periods where the majority of collisions have occurred (i.e. across the daytime period).</p> <p>On top of the impacts of each individual project, there are the impacts of the cumulative two projects going ahead together (Scenario 1). Appendices 26.25 provide indicative traffic flow diagrams for the cumulative impact of the two developments, these are for the combined average day of the peak, and show, if all materials were from the south a peak impact of 452 daily movements (182 cars and 270 HGVs) at the junction.</p> <p>On average there is a potential increase in A12 South right turn manoeuvres to the A1094 from 20 seconds to 40 seconds in the AM peak hour for the one project on its own scenario and an increase of 32 seconds in the two-project scenario to a total of 52 seconds.</p> <p>Increased delay has the potential to lead to increased driver frustration and poor gap acceptance, increasing the likelihood of collisions.</p>	<p>Abnormal Loads</p> <p>The Applicants have submitted a Traffic and Transport: Deadline 1 Clarification Note to the Examinations at Deadline 1 (document reference ExA.AS-8.D1.V1), which provides further clarification and detail on operational and decommissioning phase AIL demand for the Projects.</p> <p>The Clarification Note concludes that it is reasonably expected that once the transformers are installed, there would be no requirement for AIL movements during operations. During decommissioning, the Clarification Note concludes that transformers may be reduced into smaller components or removed off site as AILs. The latter would require a maximum of four movements and would be subject to the same assessment and controls (or future equivalent) as the construction phase AIL as detailed in Appendix 26.3 (APP-529).</p> <p>Noting that it is unlikely that there be the requirement for operational AIL movements, the works required to the A1094/B1069 (Appendix 26.5 (APP-531)) are temporary for the duration of the construction phase.</p> <p>Mitigation Measures at A12/A1094 Friday Street</p> <p>The Applicants consider that the mitigation proposed within Chapter 26 (APP-074) is sufficient to mitigate the impacts arising from the construction traffic associated with the Projects. However, the Applicants have noted the representations from the Councils and have prepared a concept design for the temporary installation, operation and subsequent removal of traffic lights and associated highways signage at the A12/A1094 Friday Street junction as well as an associated speed limit reduction. The Councils confirmed they are satisfied with the concept design and modelling. The Applicants continue to discuss the traffic signal solution with the Councils and if progressed, further information will be submitted to the Examinations.</p>



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			<p>The highway authority remains of the opinion that the mitigation set out in the DCOs is not sufficient to mitigate the development impact as the area is already subject to comprehensive signing and enforcement. The only significant alteration is the reduction in the speed limit, but it is clear from the existing situation that this in itself requires enforcement to be at least partially effective.</p> <p>For clarity, we are of the opinion that a 3-arm roundabout would be a solution, but that it is not the only solution at this location. We are also concerned about the potential for delivering one form of mitigation at this location only for it to be replaced by another alternative form should Sizewell C be permitted and begin construction; however, these issues are not easily reconcilable, and it is paramount for appropriate mitigation, especially when relating to road safety, to be delivered in all scenarios.</p> <p>As part of an ongoing workstream with the Applicants an average speed limit scheme was investigated; the Councils are of the opinion that a potential average speed camera scheme is likely to reduce speeds on the road and to be a more effective scheme than that proposed in the DCOs, and in isolation of the scheme's other impacts would reduce the rate of accidents. However, the increase in traffic, particularly right turning movements and additional HGVs is likely to increase the frequency if not the severity of crashes. The road safety data shows that speed in itself is not considered a factor, but poor driver behaviour or judgement is. This means that we cannot conclude that the Major Adverse impact would be sufficiently mitigated and is not in our view conducive in reducing this to a Minor Adverse impact.</p> <p>However, in continuation of this workstream a potential scheme involving a traffic signal arrangement discussed between the parties has been indicated as acceptable mitigation by the highway authority, subject to relevant detailed design etc. It is understood now that this scheme is being proposed by the Applicants and on this basis the road safety impacts are considered to be capable of being mitigated to an acceptable level, subject to relevant detailed design and technical approvals.</p> <p>A more comprehensive technical note on the assessment of the historic road safety schemes can be provided, if helpful to the ExA.</p> <p><u>Planning Obligations</u></p> <p>While not the only option we consider that planning obligations are a suitable mechanism to agree a number of matters including</p> <ul style="list-style-type: none"> • Traffic review group and monitoring (if not satisfactorily covered elsewhere). This could include review and implementation of Travel Plan • Highway maintenance and structural repairs (as Sizewell B dry store) and proposed in para 71 of the OCTMP • An implementation plan for highway works (if not included as a requirement) • Maintenance costs of highway mitigation such as average speed cameras or traffic signals and cost of any modification to permanent speed camera at Farnham • Technical approval of Highway Works (s278 agreements) • Order making where not included in the DCO (PRoW, Permanent speed limit changes) • Monitoring equipment for Stratford St Andrew AQMA • Costs of AIL management including structural assessments <p><u>Cumulative Impacts</u></p> <p>At the time of submission, the information submitted was the best available to the Applicants and considered reasonable by the Highway Authority, assuming that it would highlight likely areas of concern, and on the assumption that it would be updated following the submission of Sizewell C</p>	<p>As per the <i>Draft SoCG: East Suffolk Council and Suffolk County Council</i> (document reference ExA.SoCG-2.D1.V2), the Applicants note that discussions with the Councils are ongoing regarding the appropriateness for temporary speed limit reductions to be incorporated within the <i>draft DCO</i> (APP-023).</p> <p><u>Cumulative Impacts</u></p> <p>The Applicants have submitted a <i>Sizewell Projects Cumulative Impact Assessment: Traffic and Transport, Noise and Air Quality Clarification Note</i> to the Examinations at Deadline 2 (document reference ExA.AS-6.D2.V1). This note provides further consideration and assessment of cumulative traffic and transport impacts associated with the overlapping construction and operation of the Projects and both Sizewell C and the proposed relocation works at Sizewell B.</p> <p><u>Scoping out of Operational, Maintenance and Decommissioning</u></p> <p>The Applicants have submitted a <i>Traffic and Transport: Deadline 1 Clarification Note</i> to the Examinations at Deadline 1 (document reference ExA.AS-8.D1.V1), which provides further clarification and detail on operational and decommissioning phase AIL demand for the Projects and presents figures within Appendix A illustrating the proposed AIL route options.</p> <p><u>Traffic Movements</u></p> <p>The Councils' comments on these matters are welcomed by the Applicants. As agreed during the SoCG process, the Applicants will submit an updated <i>Outline CTMP</i> (APP-586) and an updated <i>Outline Travel Plan</i> (APP-588) to the Examinations at Deadline 3, which will set out measures to control traffic to the flows assessed within <i>Chapter 26</i> of the ES (APP-074).</p> <p><u>Mitigation Compromising Other Schemes e.g. Sizewell C</u></p> <p>The Applicants have noted the potential interaction with other schemes coming forward in a similar timeframe anticipated for the Projects. As per statement LA-04.32 in the <i>Draft SoCG: East Suffolk Council and Suffolk County Council</i> (document reference ExA.SoCG-2.D1.V2), the</p>



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			<p>DCO.</p> <p>The Applicants have agreed to provide additional assessment following the submission of the Sizewell C DCO; however, for clarity the Councils have not received this submission as yet, but are expecting to receive it in the near future and have had discussions with the Applicants on this matter.</p> <p>As the Sizewell C project could be delivered simultaneous with both or either EA1N or EA2, the cumulative impact is relevant to both projects.</p> <p>While scoping out of the worker trips during the operational phase is acceptable, we note that the transport impacts of the port related operations for construction and operation are assessed separately through a port travel plan. Works 35 to 37 are also to be assessed separately. This piecemeal assessment of the scheme makes it difficult to consider the full impacts of the scheme in its entirety.</p> <p><u>Scoping out of Operational, Maintenance and Decommissioning.</u></p> <p>In terms of workers trips for operational and maintenance reasons we accept these are few and unlikely to have a significant impact on the highway network. The Authorities main concern is access to the substation site for HGV's and ALLs during operation, maintenance and decommission. While numbers are likely to be small it is the nature of the route particularly through Leiston, Friston and the A1094/B1069 and B1122 junction that causes concern. These impacts are not considered nor those associated with the offsite highway improvements and port activities makes it difficult to assess the full impacts of these projects on the highway network.</p> <p><u>Traffic Movements</u></p> <p>At the time of submission, the Councils were concerned that without adequate controls the vehicle movements assessed for either project within the traffic and transport chapter of the ESs were only theoretical and could be subject to significant change, or at least day-to-day variance that could mean higher HGV numbers in particular. However, we would like to say that the level of detail provided by the Applicants on origin or movements provided within the submission was very helpful.</p> <p>Since submission, the Applicants have agreed that the Outline Construction Traffic Management Plan (OCTMP) and Outline Travel Plan (OTP) will include measures to control traffic flows to those assessed within Chapter 26 of the ESs, and as such they are considered acceptable following the relevant amendments to those documents being formally submitted by the Applicants, and agreement will be needed on the exact format of these controls. The Councils are of the view the controls should be agreed before any onshore preparation works commence.</p> <p><u>Mitigation Compromising Other Schemes e.g. Sizewell C; and</u></p> <p>Throughout the process, the highway authority has needed to consider the potential implications of a number of scenarios relating to the delivery of other infrastructure; including:</p> <ul style="list-style-type: none"> • Sizewell C • Brightwell Lakes • Strategic highway infrastructure on the A12 corridor • Brightwell lakes is large urban extension to the east of Ipswich on the SCC controlled part of the A12. <p>Strategic infrastructure refers to the Major Road Infrastructure bids made to the Department for Transport for improvements to the A12 to the east of Ipswich and at Woodbridge to the north. It has consistently been the aim of the highway authority to minimise disruption of all the differing projects on each other; however, the highway authority is not in control of the phasing and delivery of a number of these projects and are limited by the same bidding processes for Central Government funding that all</p>	<p>Applicants are considering a request from the Councils on entering into a communication group.</p> <p><u>Other Matters</u></p> <p>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>



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
			<p>highway authorities must go through. Therefore, scope remains for significant interaction between construction works for projects.</p> <p>Most pertinently to the project, based on the timescales that applicants have submitted to the highway authority, reasonable potential exists for the following project interaction:</p> <ul style="list-style-type: none"> • Sizewell C to be constructing a roundabout at A12/A1094 Friday Street during a period where the Applicants traffic requires to use this junction. • Brightwell Lakes planning permission to be undertaking works at 3 roundabouts at Martlesham or building their site access. • Sizewell C to be constructing one of their numerous works on B1122 (Site access; Abbey Road junction; Green Rail route) during EA1N and EA2 construction. • The Applicants to be constructing their Lover's Lane access. • Potential impact of any highway works at A12 Marlesford Bridge on construction traffic. • Delay for SPR HGVs associated with Sizewell C AILs. • Construction of the minor highway works on the B1122 and A1094 <p>It is important that all parties are willing to communicate throughout project delivery.</p> <p><u>Protective Provisions for SCC access as highway authority for inspection and maintenance.</u></p> <p>The Highway Authority is concerned that the powers of the DCO constrain its ability to discharge its duty under s41 of the Highways Act (1980), specifically to inspect and maintain the highway. We note that statutory utilities have protection for their apparatus, but similar provisions have not been made for the Highway Authorities apparatus.</p>	
1.18.4	ESC	<p>1 2 As LPA you raise concerns in your RR [RR- 002] about the following matters:</p> <ul style="list-style-type: none"> - abnormal loads; the mitigation measures proposed at the A12/A1094 Friday Street junction (40mph speed limit southbound on A12, rumble strips, repositioning of speed camera – a new roundabout is suggested); - the lack of planning obligations; - cumulative impacts; - the scoping out of operations, maintenance and decommissioning activities; - traffic movements; - mitigation compromising other schemes eg Sizewell C; and - Protective Provisions for SCC access as highway authority for inspection and 	<p>SCC Lead Authority - Highways – please see above response to 1.18.3</p>	<p>The Applicants refer to their comment on SCC's response to Examining Authority's Question 1.18.3 above.</p>



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2
		<p>maintenance. Please expand on these concerns as they relate to planning issues:</p> <p>a) giving more detail; b) explaining why and how they are attributable to each of the proposed projects; and - specifying what in your view remains outstanding.</p>		
1.8.5	SCC	<p>1 2</p> <p>Notwithstanding the above, do SCC and the Local Planning Authorities agree with the methodology, baseline data and predicted traffic movements used to assess traffic and transport impacts in the ES? What, if any, are the outstanding issues?</p>	<p><i>SCC Lead Authority - Highways</i></p> <p>Methodology</p> <p>The Councils remain concerned about the methodology used for assessing some traffic impacts of the development within the ESs; these areas are summarised below and reflect our concerns about how the impact is felt by the individual.</p> <ol style="list-style-type: none"> 1. Severance – the changes in traffic flows required to result in a change in impact are large, being 30%; and represent a coarse tool for identifying changes. The methodology has been derived from studies of major changes in traffic flow and so needs to be treated with caution. There is evidence that community severance can occur with relatively small changes in traffic and that perception of severance can be affected by environment meaning that 'generic' figures may not be appropriate. 2. Amenity – The assessment of changes in amenity are based on locations where traffic flows double. Clearly this can require a significant change in traffic flow and the highway authority consider it to be a coarse assessment method. Increased traffic flows can lead to changes in perception, suppressed walking trips, perceptions in danger and in some cases a 50% change in traffic flow might be more impactful than a 200% change. 3. Fear and Intimidation – the assessment of Fear and Intimidation appears to be included within the assessment of amenity and does not appear to utilise the criteria of changes in average hourly traffic flows (albeit that the highway authority would have concerns with this method was it to be used without caution). <p>However, it is recognised that the Applicants' methodology is consistent with many other environmental assessments of traffic impacts and is not specifically criticising them for using this approach. However, the methodology has its limitations which means that significant impacts may occur that are not being identified, albeit the temporary nature of traffic associated with the development also needs to be considered as well.</p> <p>The Councils are also of the opinion that the assessments do not fully consider what the accumulative impact of the number of different impacts e.g. severance, amenity, road safety etc) might be collectively to a community. No consideration is given to whether a number of minor adverse impacts collectively represent a moderate or major adverse impact to an individual.</p> <p>The methodology used for all other areas in the ESs is considered acceptable.</p> <p>Baseline Data</p> <p>The highway authority is content that the baseline data submitted is acceptable.</p> <p>Predicted Traffic Movements</p>	<p>Methodology</p> <p>The Applicants have submitted a <i>Traffic and Transport: Deadline 1 Clarification Note</i> to the Examinations at Deadline 1 (document reference ExA.AS-8.D1.V1), which includes further clarification and justification on the use of the GEART as a tool for assessing the impact of changes in traffic flow upon amenity and severance.</p> <p>As agreed during the SoCG process, the Applicants will submit an updated <i>Outline CTMP</i> (APP-586) and an updated <i>Outline Travel Plan</i> (APP-588) to the Examinations at Deadline 3, which will set out measures to control traffic to the flows assessed within <i>Chapter 26</i> of the ES (APP-074).</p> <p>Baseline Data</p> <p>Noted.</p> <p>Predicted Traffic Movements</p> <p>As previously mentioned, the Applicants will submit an updated <i>Outline CTMP</i> (APP-586) and an updated <i>Outline Travel Plan</i> (APP-588) to the Examinations at Deadline 3.</p> <p>Outstanding Issues</p> <p>As previously mentioned, the Applicants will submit an updated <i>Outline CTMP</i> (APP-586) and an updated <i>Outline Travel Plan</i> (APP-588) to the Examinations at Deadline 3.</p> <p>If agreed, further information will be submitted to the Examinations regarding a traffic light solution at Friday Street junction when available.</p> <p>Section 26.9, Chapter 26 of the ES (APP-074) assesses the potential of the traffic and transport impacts to interact (synergistic impacts) on pedestrians, cyclist and motorists. For pedestrians no synergistic impacts are identified. For other user groups, the assessment concludes the management</p>



ExA. Question Ref.	Question addressed to	ExA. Question	Interested Parties' Response at Deadline 1	Applicant's Comments at Deadline 2	
			<p>At the time of submission, the Councils were concerned that without adequate controls that those vehicle movements assessed within the traffic and transport chapter of the ESs were only theoretical; albeit the level of detail submitted in the DCOs by the Applicants was very helpful.</p> <p>However, the Applicants have agreed that the OCTMP and OTP will include measures to control traffic flows to those assessed within the Chapter, and as such they are considered acceptable on this basis, and we await formal submission of these updated documents, for which the exact format of controls will need to be agreed.</p> <p>Outstanding Issues:</p> <p>The following outstanding issues remain:</p> <ul style="list-style-type: none"> • Agreement that the methodology used would fully identify the environmental impacts associated with transport. • Formal submission of updated OTP and OCTMP and agreement on the methods of control. • Formal submission of the traffic signal solution at A12/A1094 Friday Street. 	measures to be agreed with the Highway Authority will mitigate individual and synergistic impacts.	
ES Chapter 26 Traffic and Transport [APP-074]					
1.18.9	SCC	1 2	<p>Paragraph 136 says that you have agreed with SCC that the road safety review "should examine the rate of collisions per length of road in miles ..." and in paragraph 137 you say that "Collision rates have been calculated in billion vehicle miles ...".</p> <p>It is not clear where the methodology of assessing collisions per length of road in miles originates.</p> <p>a) Please explain. b) Does the highway authority have a view?</p>	<p>SCC Lead Authority - Highways</p> <p>The highway authority is content with the method used, as it has been used for indicative purposes and assessment has also been undertaken of collision clusters separately (as requested in July 2018 ETG meeting). The review of the rate of collisions against national data was useful to identify sections of highway where the frequency of crashes to enable a more data led assessment of road safety. A similar approach is taken to County wide safety assessment of major roads and in the Sizewell C Transport Assessment. The highway authority however remains mindful that, along with other areas of assessment within the ES, the method of assessment is still reliant on professional judgement and so has considered the applicants review against our own knowledge of local collision history.</p>	Noted
1.18.19	SCC	1 2	<p>Paragraphs 18 and 19 mention temporary alterations to the highway (listed in Table 26.2) and that it is anticipated that these would be completed before construction starts on the relevant section of the cable route.</p> <p>Please</p> <p>a) explain why and under what circumstances construction might start before completion of these</p>	<p>SCC Lead Authority - Highways</p> <p>With regards to works at the A12/A1094 junction and the A1094/B1069 junction</p> <p>a. The highway authority does not envisage any situation where these works would not be completed prior to HGV movements using the A1094. b. It is assumed that they would be needed for the duration of both projects.</p> <p>With regards to Marlesford Bridge</p> <p>a. Limited detail has been provided on the nature of these works; however, it is assumed that they would be needed prior to the AILs using this route. The Council would require assurance that any works required will not unduly impact the local highway network being mindful of the lack of suitable diversion routes for large vehicles and the likelihood of Sizewell traffic already using this route.</p>	<p>The Applicants refer to their response to Q1.18.19 in Applicants' Responses to Examining Authority's Written Questions Volume 18 (document reference ExA.WQ-1.D1.V1_18) submitted at Deadline 1.</p> <p>The Applicants note that the requirement for works at Marlesford Bridge (Work No. 37) is dependent on the port selected for the import of the transformers and an investigation into the structural integrity of the bridge which is not available from at this stage from the local highway authority.</p> <p>Chapter 26 of the ES (APP-074) outlines that potential mitigation could be required if AILs</p>



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		<p>b) alterations; state for how long these temporary alterations would be needed; and confirm that there are no other offsite locations which in your view would require highway improvements in connection with this project.</p>	<p>With regards to the requirement for wider works:</p> <ul style="list-style-type: none"> • If the main operational access to the substation site is to be via the A1094/B1121 junction this junction should be assessed for the turning movements of large vehicles and associated impacts on road safety. This junction is on a bend, in a dip making EB left turning movements difficult. • The highway authority is not aware of any other locations that would require physical works for them to be suitable to accommodate larger vehicles for site construction. • There are a number of locations on the A12 where the increase in traffic during construction would have a noticeable detrimental impact on highway capacity. <p>The Councils are aware that the definition of onshore preparation works includes creation of the highway accesses, footpath creation and highway alterations but that the CoCP and associated management plans are not required to be finalised before commencement of construction. While the Councils welcome early delivery of this work it considers that the same controls should apply to the preparation works as for the main element of construction. The DCOs as submitted requires the final CTMP and CTP to be submitted prior to commencement, potentially after the pre commencement works are undertaken.</p>	<p>associated with the delivery of the Projects' transformers were to pass over this structure. Chapter 26 of the ES (APP-074) outlines two potential ports for the import of the transformers: Lowestoft and Felixstowe. Should the load come from Lowestoft the AILs would not pass over the Marlesford Bridge and therefore no alterations would be required. If the load were to come from Felixstowe, the load would pass over the Marlesford Bridge. Should the Felixstowe option be taken forward, further investigations would be undertaken and the requirement for mitigation and associated traffic management agreed with the Councils. If mitigation is required it is reasoned that the works would not be required until such point as the transformers are required in the construction programme.</p> <p>The Applicants note the Councils representations with regard to large vehicle EB left turn movements during operations and this will be discussed through the SoCG process.</p> <p>Chapter 26 of the ES (APP-074) and the Sizewell Projects Cumulative Impact Assessment: Traffic and Transport, Noise and Air Quality Clarification Note to the Examinations at Deadline 2 (document reference ExA.AS-6.D2.V1) do not identify the requirement for additional off-site highway works associated with capacity improvements on the A12.</p> <p>The Applicants note that the measures within the final CoCP will apply to the works undertaken at Work No. 35, Work No. 36 and Work No. 37. The Applicants consider that the measures within the Outline CoCP (APP-578) are disproportionate for the creation of accesses, given the scope and minimal impact associated with these works. In accordance with Requirement 16 of the draft DCO (APP-023), access management measures will be included within the final Access Management Plan to be submitted to and approved by the relevant planning authority prior to the construction of any access.</p> <p>The Applicants will submit an updated Outline CTMP (APP-586) and updated Outline Travel Plan (APP-588) to the Examinations at Deadline 3.</p>



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1.18.45	SCC	1 2 In Table 26.24 it says that collision cluster 3 at the junction of A12 and A1094 (links 2,3 and 6) is expected to experience a 49% increase in HGV (Table 26.24) and the Applicant considers that "the change in HGV traffic could potentially lead to significant impacts" in terms of road safety, assessing the impact as major adverse (paragraph 294). The Applicant further notes in paragraph 296 that it is "unclear at this stage whether the Sizewell C New Nuclear Power Station proposals would come forward or be delivered prior to the commencement of construction" of this project, and proposes an independent set of physical mitigation measures (paragraphs 297 and 298) for the A12/A1094 junction complemented by the control of employee traffic movements as outlined in the OTP [APP- 588] (paragraph 300). a) Bearing in mind that the Sizewell C project has now been accepted for examination, do you consider that the proposed mitigation at the A12/A1094 junction is adequate? Do you think that the downward trend of collisions at the A12/A1094 junction is a reliable basis for the assessment?	<p>SCC Lead Authority - Highways</p> <p>For confirmation; it is assumed that the 'proposed mitigation' referred to in this case is that proposed as part of this application (i.e. EA1N and EA2). However, in order to cover all scenarios both have been commented on below.</p> <ol style="list-style-type: none"> 1. Sizewell C mitigation would be sufficient to mitigate impacts at this junction for both EA1N and EA2 in isolation or combined; however, the highway authority does not have the powers nor the funding to ensure delivery of this mitigation prior to the EA1N or EA2 projects being delivered. 2. With regards to the Applicants' proposals, 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 in the Local Highway Authority's professional opinion to avoid an increase in collisions. However, the discussed temporary traffic signal scheme is considered acceptable. <p>With regards to traffic trends, as more recent road safety information is available for the junction now, it is appropriate to consider as part of any conclusions that are reached.</p> <p>SCC have reviewed the crashes recorded at this site between October 2014 and September 2019 (inclusive) and considered this information in its comments.</p> <p>It is clear that a pattern of collisions remains, and it would be debateable to simply omit the previous year's collisions data given that no improvements have occurred at the junction since this time. The reduction could be as a result of a number of factors or just down to statistical variation and we remain cautious on this basis.</p> <p>The recent decrease in collisions is noteworthy and has been considered by the highway authority, but we retain our previous position on this matter. It is noticeable that there has been limited growth in traffic at this location and this application will create a significant increase, particularly in larger vehicles.</p>	<p>The Applicants consider that the mitigation proposed within Chapter 26 (APP-074) is sufficient to mitigate the impacts arising from the construction traffic associated with the Projects. However, the Applicants have noted the representations from the Councils and have prepared a concept design for the temporary installation, operation and subsequent removal of traffic lights and associated highways signage at the A12/A1094 Friday Street junction as well as an associated speed limit reduction. The Councils confirmed they are satisfied with the concept design and modelling. The Applicants continue to discuss the traffic signal solution with the Councils and if progressed, further information will be submitted to the Examinations.</p> <p>As per the Draft SoCG: East Suffolk Council and Suffolk County Council (document reference ExA.SoCG-2.D1.V2), the Applicants note that discussions with the Councils are ongoing regarding the appropriateness for temporary speed limit reductions to be incorporated within the draft DCO (APP-023).</p> <p>The Applicants have considered trends in the baseline condition in terms of traffic and transport within Section 26.5.7, Chapter 26 (APP-074). Further consideration of this matter has been presented within the Traffic and Transport: Deadline 1 Clarification Note submitted to the Examinations at Deadline 1 (document reference ExA.AS-8.D1.V1).</p>
1.18.58	SCC	1 2 In paragraphs 349 to 352 the applicant lists and describes briefly the three assessment scenarios presented by the Sizewell C project in its PEIR, namely i) Early years, a three year period commencing 2022; ii) Peak construction	<p>SCC Lead Authority - Highways</p> <p>With regards to the cumulative assessment; at the time of submission we were satisfied that the level of assessment was reasonable on the basis that it would be updated to reflect Sizewell C project details once the DCO was submitted.</p> <p>The Applicants have agreed to provide additional assessment following the submission of the Sizewell C DCO; however, the Councils have not received this submission as yet, but are expecting to receive it in the near future and have had discussions on this matter with the applicant.</p> <p>The Applicants' assessment should review the cumulative impact of Sizewell C, in particular the change to an integrated transport strategy in the submitted DCO rather than a rail or road led</p>	<p>The Applicants have submitted a Sizewell Projects Cumulative Impact Assessment: Traffic and Transport, Noise and Air Quality Clarification Note (Traffic and Transport) to the Examinations at Deadline 2 (document reference ExA.AS-6.D2.V1), which provides further review and assessment of the Sizewell C DCO application material and the potential cumulative impacts arising between the Projects and both Sizewell C and the proposed relocation works at Sizewell B.</p>



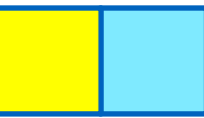
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		<p>(road option); and</p> <p>iii) Peak construction (rail option)</p> <p>Paragraph 353 then lists three cumulative impact assessment scenarios, combining the East Anglias scenario 1 (construction of both the East Anglia projects simultaneously) with each of the three Sizewell C New Nuclear Power Station project options, namely</p> <p>i) early years,</p> <p>ii) peak construction (rail option) and</p> <p>iii) peak construction (road option).</p> <p>In paragraph 354 the Applicant states that "The Stage 4 consultation document does not contain sufficient information to facilitate a quantitative assessment."</p> <p>Please advise whether or not you are satisfied with the three cumulative impact assessment scenarios listed in paragraph 353. If you are not satisfied, please explain why.</p>	<p>strategy presented by EDF in the stage 3 consultation. Until this information is presented the Councils cannot accept that the cumulative impacts have been adequately assessed.</p> <p>Outstanding Issue Revised cumulative impact of Sizewell (as submitted in the DCO), EA1N and EA2 to be submitted by the Applicants and reviewed</p>	
1.18.59	EDF Energy (Sizewell C New Nuclear)	<p>Paragraph 354 refers to your freight management strategy for the construction of the Sizewell C New Nuclear power station. • Please provide the latest version of this strategy.</p>	<p>The freight management strategy for Sizewell C proposes to utilise a combination of road, rail and marine deliveries of materials to the construction site. Deliveries on each mode will be supported by additional infrastructure:</p> <ul style="list-style-type: none"> - Road – a two village bypass of Farnham and Stratford St Andrew, a Sizewell link road bypassing the B1122, a freight management facility a roundabout at Yoxford roundabout and other minor highway improvements; - Rail – upgrades to the Leiston branch line and a new rail link into the construction site; - Marine – a beach landing facility for the delivery of abnormal indivisible loads. <p>The Sizewell C freight management strategy is described in Chapter 4 of the Transport Assessment (Doc Ref. 8.5) submitted with our application for development consent and available here:</p> <p>https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010012/EN010012-002220-SZC_BK8_8.5_Transport%20Assessment.pdf</p>	No Further Comments.



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1.18.60	SCC	1 2 Paragraphs 359 to 367 refer to highway improvements proposed in relation to the Sizewell C New Nuclear Power Station project, which it is not currently envisaged will be available prior to construction work starting on this East Anglia project. Given that the Sizewell C New Nuclear Power Station project has been accepted for examination, have any discussions been held between the Applicant, EDF Energy and the highway authority in relation to ways in which these improvements could be ready for use prior to work commencing on the East Anglia ONE North and East Anglia TWO project(s) in order to reduce cumulative impacts?	<p>SCC Lead Authority - Highways</p> <p>With regards to the delivery of the Sizewell C mitigation; consideration has been given to the delivery of Sizewell C mitigation. However, it is not envisaged that EDF would forward fund their mitigation prior to having an investment decision on their project.</p> <p>It would be beneficial to have this mitigation in place as early as possible to mitigate cumulative impacts as well as to avoid potentially short-term works associated with EA1N and EA2 potentially being replaced by the Sizewell C mitigation shortly after delivery; however, the scale of mitigation is not considered reasonable for the EA1N and EA2 projects in isolation. It is also of note, that the Sizewell C mitigation in both cases requires the purchase of land outside of the control of the Applicants, being outside of their red line, and outside of the control of the highway authority and so would require relevant powers to be granted or agreements to be in place to construct the mitigation; which has not currently been evidenced to be necessary should the Sizewell C development not come forward.</p> <p>EDF have provided an implementation plan as part of their submission which indicates delivery of:</p> <ul style="list-style-type: none"> • The Sizewell Link Road within two and a half years of start of the project. • The Two Village Bypass within two years of start of project. <p>And it is expected that the A12/A1094 junction would be one of the first items of mitigation that EDF would deliver; however, we cannot guarantee either if or when their project would commence construction.</p> <p>As set out above, further review of the cumulative impacts will be undertaken following submission of the Applicants' technical review and in those locations where a cumulative impact occurs but mitigation is not delivered in the Early Years Scenario, it would be reasonable to seek sufficient controls or mitigation to mitigate those short-term impacts.</p> <p>With regards to phasing the largest concerns are associated with the delivery of the A12/A1094 roundabout junction which forms mitigation for the Sizewell C development. The lack of control of the phasing of these projects means that a number of scenarios exists where that junction is or is not delivered adding significant problems for the highway authority.</p> <p>While the Highway Authority has liaised with the Applicants and EDF separately regarding delivery of highway mitigation no joint meeting has been held between all three applicants other than to discuss transport modelling and cumulative traffic impact.</p> <p>The Highway Authority's principal objective is that all applicants co-ordinate their mitigation works so that they are delivered in a timely manner to alleviate the impacts and to minimise disruption to road users.</p> <p>Note: The Highway Authority also desires co-operation between applicants to effectively monitor and enforce controls across the projects</p>	<p>The Applicants have submitted a Sizewell Projects Cumulative Impact Assessment: Traffic and Transport, Noise and Air Quality Clarification Note (Traffic and Transport) to the Examinations at Deadline 2 (document reference ExA.AS-6.D2.V1), which provides further review and assessment of the Sizewell C DCO application material and the potential cumulative impacts arising between the Projects and both Sizewell C and the proposed relocation works at Sizewell B.</p> <p>The Applicants consider that the mitigation measures proposed for the Projects adequately mitigate their potential impacts, and therefore adequately mitigate the proportion of the cumulative impact attributable to the Projects.</p> <p>The Applicants are open to engaging with Sizewell C on matters relating to traffic and transport. Within the draft SoCG with SZC submitted to the Examinations at Deadline 1 (REP1-061), agreement between the parties has been reached on statement SZC-501:</p> <p><i>"The Applicants and SZC will engage regularly with each other during design and construction of their respective projects so that any interface between the projects can be considered at an early stage, recognising it is in the interests of the Applicants and SZC as well as the wider community that all projects be coordinated as far as reasonably practicable".</i></p>
1.18.60	EDF Energy (Sizewell C New Nuclear)	1 2 Paragraphs 359 to 367 refer to highway improvements proposed in relation to the Sizewell C New Nuclear Power Station project, which it is not currently envisaged will be available prior to construction work starting on this East Anglia project.	<p>There is regular engagement on transport matters between SZC Co. and SPR, including the proposed highway improvements for the three projects. There is only one significant overlap where the proposals for the projects differ and that is the A12/A1094 Friday Street junction.</p> <p>Under the Sizewell C Application, this junction would be revised to form the northern roundabout for the two village bypass scheme. The EA1N and EA2 proposals do not include a roundabout at this junction and the proposed intervention would be within the existing public highway boundary.</p>	No further comments.



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		Given that the Sizewell C New Nuclear Power Station project has been accepted for examination, have any discussions been held between the Applicant, EDF Energy and the highway authority in relation to ways in which these improvements could be ready for use prior to work commencing on the East Anglia ONE North and East Anglia TWO project(s) in order to reduce cumulative impacts?	As the three projects progress, an ongoing dialogue will be maintained regarding the timing for implementation proposals at this junction. Discussions between the parties and with the highway authority will establish the most appropriate timing to commence work at this junction.	
Outline Travel Plan				
1.18.65	SCC	<p>Paragraph 50 defines a breach of the final Transport Plan and paragraph 52 outlines the three stages proposed for the Transport Plan enforcement process.</p> <ul style="list-style-type: none"> As highway authority, are you content with these proposals? 	<p><i>SCC Lead Authority - Highways</i></p> <p>The defined breaches in paragraph 50 are acceptable, however, it is assumed that these can be reviewed and if necessary, amended through mutual agreement through the structure proposed in plate 1.1. This structure should reflect the co-operative relationship with other concurrent NSIPs and should not prevent Highway Stakeholders corresponding with the Applicants on relevant matters.</p> <p>The Councils seek assurance that the measures within the Travel Plan also apply to workers with vans provided for their work.</p> <p>The three enforcement stages in paragraph 52 are acceptable. Note that we have comments to make on the control measures, monitoring and enforcement embedded within all management plans.</p>	<p>The Applicants will ensure they communicate and cooperate with developers of other NSIPs with which cumulative construction traffic impacts may arise. The Applicants will amend the Outline CTMP (APP-586) Governance Structure illustrated within plate 1.1 of the Outline CTMP (APP-586) such that other NSIPs are included within the definition of 'Highways Stakeholders', where relevant. The updated Outline CTMP (APP-586) will be submitted to the Examinations at Deadline 3.</p> <p>The Applicants confirm that the measures included within the final approved CTMP and final approved Travel Plan will apply to all contractors and subcontractors working on the Projects.</p>
Outline Access Management Plan				
1.18.70	SCC	<p>Section 2.2 sets out the design of the proposed accesses (paragraphs 2228) and section 2.3 deals with crossing design (paragraphs 29-36). It is intended that technical approval is obtained post consent. The ExA note that a Stage 1 Safety Audit was completed in July 2019 and is appended at Annex 2.</p> <p>As highway authority, do you have any concerns about any of the proposed accesses or the associated traffic management arrangements?</p>	<p><i>SCC Lead Authority - Highways</i></p> <p>The Councils accept that the design of the temporary access is acceptable in principle pending detailed technical agreement. There are some minor outstanding matters such as visibility for the B1069 access (Access 9) where the visibility splay includes and are outside the red line and highway boundary. Acceptance at this stage is subject to the necessary removal of trees and hedges being acceptable in planning terms.</p> <p>The Authority notes the lack of centreline on the B1121 highlighted in problem 10 may be due to carriageway widths less than 5.5m when centre lines should not be used (Traffic Signs Manual Chapter 5). Other than this item the road safety audits are acceptable provided the measures recommended in Annex 2 are resolved during design.</p> <p>The Councils are content that the detailed traffic management for highway works and access construction can be agreed during the technical approval of these works. The Councils have sought assurance that Sizewell Gap will not be closed to prevent access to Sizewell at any time. In table 26.4 the Applicants clearly state that no road to be fully closed to install cables under the public highway. Assurance is required that roads will not be closed for other reasons.</p> <p>Clarity is required regarding the legislation to be used to implement temporary speed limits</p>	<p>Noted.</p> <p>With regard to Access 13, a speed limit is proposed for the duration of the construction phase due to the intensification of turning movements. This is not considered necessary during operation due to the infrequent nature of traffic demand.</p> <p>The Applicants note the Councils representations with regard to large vehicle EB left turn movements during operations and this will be discussed through the SoCG process.</p> <p>It should be noted that Access 13 has been designed to current highway standards and meets the requirement for safe visibility based on speed surveys undertaken on site.</p>



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			<p>necessary for the accesses as the powers under the Road Traffic Regulation Act (1984) are restricted to a maximum duration of 18 months.</p> <p>The Highway Authority questions why a temporary speed limit is necessary for Access 13 during the temporary works but not when it is a permanent access as there are no material differences between either layout.</p>	