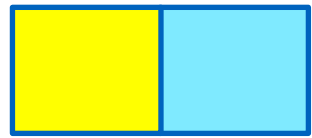




SCOTTISHPOWER  
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# East Anglia ONE North and East Anglia TWO Offshore Windfarms

## Draft Statement of Common Ground

East Suffolk Council and Suffolk  
County Council (Human Health)

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**



#### Revision Summary

Rev	Date	Prepared by	Checked by	Approved by
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#### Description of Revisions

Rev	Page	Section	Description
001	n/a	n/a	First draft SoCG issued to the Examining Authority at Deadline 3

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## Glossary of Acronyms

AQMA	Air Quality Management Area
CIA	Cumulative Impact Assessment
CoCP	Code of Construction Practice
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
ESC	East Suffolk Council
NG-ESO	National Grid Electricity System Operator
PM	Particulate Matter
PRoW	Public Right of Way
SCC	Suffolk County Council
SoCG	Statement of Common Ground

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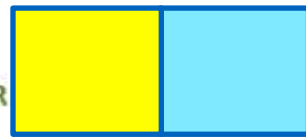
## Glossary of Terminology

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.
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.
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.
Meteorological mast	An offshore structure which contains metrological instruments used for wind data acquisition.
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 substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.
Offshore 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 platform	A collective term for the construction, operation and maintenance platform and the offshore electrical platforms.
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 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.
Platform link cable	Electrical cable which links one or more offshore platforms. These cables will include fibre optic cables.
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.

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# 1 Introduction

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

## 1.1 Background

2. This Statement of Common Ground (SoCG) has been prepared by East Anglia TWO Limited, East Anglia ONE North Limited (the Applicants) and East Suffolk Council (ESC) and Suffolk County Council (SCC) in relation to the East Anglia TWO project and the East Anglia ONE North project (the Projects). It identifies areas of the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications (the Applications) where matters are agreed or not agreed between the parties. Hereafter, ESC and SCC are collectively referred to as 'the Councils' or addressed by name where referred to individually.
3. The Applicants have had regard to the guidance for the examination of applications for development consent (Department for Communities and Local Government, 2015) when compiling this SoCG.
4. This SoCG has been structured to reflect topics of the Applications which are of interest to the Councils. Topic specific matters agreed, not agreed and actions to resolve matters between the Applicants and the Councils are included within this SoCG.
5. The table presented below represents the SoCG with the Applicants and the Councils in respect of the following topics (each of which includes matters pertaining to the Environmental Impact Assessment (EIA) and DCO). SCC and ESC have agreed that each topic will be led by an individual Council as indicated below.
  - Human Health (**Table 3**) (SCC).
6. Throughout the SoCG the phrase "Agreed" identifies any point of agreement between the Applicants and the Councils. The phrase "Not Agreed" identifies any point that is not yet agreed between the Applicants and the Councils.
7. The matters considered within this SoCG apply only within the context of the Councils' statutory remit. Matters that are not yet agreed will be the subject of ongoing discussion between the Applicants and the Councils to reach agreement



on the matter wherever possible, or refine the extent of disagreement between parties. The notes column of the SoCG tables provides commentary on these matters.

8. This version of the SoCG between the Applicants and the Councils follows submission of a SoCG covering all other topic areas of interest to the Councils to the Examinations at Deadline 1 (REP1-072). This version of the SoCG makes reference to statements included within the previously submitted document and should be read in conjunction with version of this SoCG submitted at Deadline 1 (REP1-072).
9. Whilst provided separately at this stage, the two versions of the Councils SoCG will be combined to create the final version of the SoCG with the Councils which will be submitted to the Examinations at Deadline 8.

## 1.2 The Development

10. The key offshore components of each project will comprise:
  - Offshore wind turbines and their associated foundations;
  - Offshore platforms - up to four offshore electrical platforms and their associated foundations supporting some of the windfarm's electrical equipment, and up to one construction, operation and maintenance platform and associated foundations that may cater for personnel and activities required during the construction phase and operation and maintenance of the windfarm;
  - Sub-sea cables between the wind turbines and offshore electrical platforms (inter-array), between separate offshore platforms (platform link cables) and between offshore electrical platforms and the landfall (export cables);
  - Scour protection around foundations and on inter-array, platform link and export sub-sea cables as required; and
  - Potential for one meteorological mast and its associated foundations for monitoring wind speeds during the operational phase of the windfarm.
11. The key onshore components of each project will comprise:
  - The landfall site with up to two transition bays to connect the onshore and offshore cables;
  - Up to six onshore cables, up to two fibre optic cables and up to two distributed temperature sensing cables installed underground (some or all of which may be installed in ducts) and associated jointing bays installed underground;
  - Onshore substation;
  - Electrical cable connection between the onshore substation and National Grid substation; and





- Temporary works.
12. National Grid infrastructure will also be required to connect each project to the national electricity grid. Key components of the National Grid infrastructure which is common to both Projects will comprise:
- National Grid substation;
  - Cable sealing end compounds and a cable sealing end (with circuit breaker) compound;
  - Realignment of the existing overhead lines; including the reconstruction or replacement of up to three existing overhead pylons in proximity to the National Grid substation and the addition of up to one new pylon in close proximity to existing overhead pylons; and
  - Temporary works.

### 1.3 Summary of Agreed, Not Agreed and Outstanding Matters

13. **Table 1** provides a summary of the matters agreed, not agreed and those which are outstanding between the Applicants and the Councils for each of the relevant SoCG topic areas. For further information on matters that are outstanding / under discussion which the Applicants and the Councils are working to address during the examination period, refer to the Notes column of each table in **Section 2** below.

**Table 1 Summary of Agreed, Not Agreed and Outstanding Matters**

Topic	Summary
Human Health	All matters relating to human health remain under discussion.

14. A number of tables within **Section 2** of this SoCG include the Councils' and Applicants' respective positions on the Cumulative Impact Assessment (CIA), as presented below:
- The Councils understand that National Grid Electricity System Operator Limited (NG-ESO) has offered grid connections to a number of potential future projects, namely the Nautilus Interconnector; the Eurolink Interconnector and the Galloper Extension (now known as the Five Estuaries) and that further connection offers are likely to be made to the Greater Gabbard extension. The Councils understanding is that these projects would connect to the new National Grid substation proposed at Grove Wood, Friston for which the Applicants are seeking consent, and that these future



connections would result in the enlargement or extension of the National Grid substation. The Councils maintain that these future energy projects should be included in the Projects' CIA. While full information may not yet be available, the Councils believe that NG-ESO is likely to be able to provide information on the effects of further grid connections on the National Grid Infrastructure proposed at Grove Wood, Friston, which should be incorporated into certain topics of the Projects' CIA. The Councils' note the non-statutory guidance provided by the Planning Inspectorate in Advice Note 17, setting out a process that applicants "may wish to adopt" for cumulative effects assessment, but do not consider it justifies the approach taken by the Applicants. Whilst the division of projects into tiers is not, in itself, a concern, Advice Note 17 does not advise that projects in Tier 3 should be left unassessed. It advises that for projects in Tier 3 "the applicant should aim to undertake an assessment where possible, although this may be qualitative and at a high level" (paragraph 3.4.3). The Councils' concern is that there are known future energy projects planned in the general vicinity, based on the offered grid connections, and it would be possible to undertake some form of assessment in relation to them for inclusion in the CIA.

- The Applicant's position on this matter is set out in detail within ***Applicant's Comments on Relevant Representations, Volume 3: Technical Stakeholders*** (AS-036). In summary, the Applicant's approach to the CIA follows Planning Inspectorate Advice Note 17 and uses a three tier system as proposed in this Advice Note to consider what projects to include within the Projects' CIA:
  - **Tier 1:** Projects under construction, permitted or submitted applications;
  - **Tier 2:** Projects on the Planning Inspectorate's Programme of Projects where a scoping report has been submitted; and
  - **Tier 3:** Projects on the Planning Inspectorate's Programme of Projects where a scoping report has not been submitted; projects identified in the relevant Development Plan (and emerging Development Plans); and projects identified in other plans and programmes (as appropriate) which set out the framework for future development consent.

Tier 1 and Tier 2 projects are included in all relevant CIAs within the Applicants' ES. Generally, Tier 3 projects have not been included within each CIA due to insufficient information available on which to base an assessment, in line with Advice Note 17. Following the guidance in Advice Note 17, the projects below were not considered in the CIA because at the time the Projects' 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):

- Nautilus Interconnector;



- EuroLink Interconnector;
- Greater Gabbard Offshore Windfarm Extension (now known as North Falls); and
- Galloper Offshore Windfarm Extension (now known as Five Estuaries).

Each of the above projects will require its own EIA and consent application and as part of that will need to undertake a cumulative assessment which reflects the development status of the Projects.

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## 2 Statement of Common Ground

15. A summary of the consultation undertaken to date with the Councils and the matters agreed or not agreed between the Applicants and the Councils (based on discussions and information exchanged between the Applicants and the Councils during the pre-application and examination phases of the applications) are set out below for each of the SoCG topic areas.

### 2.1 Human Health

16. The Projects have the potential to impact upon human health. **Chapter 27 Human Health** of the ES (APP-075) provides an assessment of the significance of these impacts.
17. **Table 2** provides an overview of consultation undertaken with the Councils regarding human health. It should be noted that consultation with regard to human health was primarily undertaken with Public Health England and The Planning Inspectorate. Further details on the stakeholder engagement process for human health can be found in the **Consultation Report** (APP-029).
18. Agreements concerning the existing environment, assessment methodology and assessment conclusions with respect to air quality, noise and vibration, traffic and transport and light pollution are provided in **Section 2.5, Section 2.8, Section 2.9**, and **Section 2.11** of the SoCG submitted at Deadline 1 (REP1-072) respectively.
19. **Table 3** provides areas of agreement and disagreement specifically regarding human health, associated with the outputs and conclusions associated with those topics.

**Table 2 Summary of consultation with the Councils regarding human health**

Date	Contact Type	Topic
<b>Post-Application</b>		
18 <sup>th</sup> March 2020	Written Correspondence	First draft SoCG issued to Councils
31 <sup>st</sup> July 2020	Written Correspondence	Applicants issued updated SoCG to Councils for comment
22 <sup>nd</sup> October 2020	Written Correspondence	Councils provided comments on SoCG



**Table 3 Human Health**

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
<b>Environmental Impact Assessment</b>							
LA-11.01	Existing Environment	Sufficient desk-based survey data in relation to air quality has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	Refer to LA-04.01 (REP1-072).
LA-11.02	Existing Environment	Sufficient desk-based survey data in relation to noise has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	Refer to LA-08.01 and LA-09.01 (REP1-072).
LA-11.03	Existing Environment	Sufficient desk-based survey data in relation to EMF has been collected to inform the assessment.	Agreed	Agreed	Agreed	Agreed	None.
LA-11.04	Existing Environment	The ES adequately characterises the baseline environment for construction, maintenance and decommissioning noise effects on terrestrial environments in terms of human health.	Agreed	Agreed	Not Agreed – in discussion	Not Agreed – in discussion	The Applicants note that this matter remains under discussion in LA-08.02 (REP1-072).
LA-11.05	Existing Environment	The ES adequately characterises the baseline environment for operational noise and vibration effects on terrestrial	Agreed	Agreed	Not Agreed –	Not Agreed –	The Applicants note that this matter remains under discussion in LA-08.02 (REP1-072).



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
		environments in terms of human health.			in discussion	in discussion	
LA-11.06	Existing Environment	The ES adequately characterises the baseline environment for air quality during construction and impact on the AQMA in terms of human health.	Agreed	Agreed	Not agreed – in discussion	Not agreed – in discussion	<p>Baseline data covers PM10 and PM2.5. The Councils consider that baseline data should also include NO<sub>2</sub> with reference to AQMAs (e.g. see para 189 of <b>Chapter 27 Human Health</b> (APP-075) which refers to potential significance of NO<sub>2</sub>).</p> <p>The Applicants have submitted an <b>Air Quality Clarification Note</b> at Deadline 1 (REP1-040), which provides further clarification on NO<sub>2</sub> emissions to address this matter.</p>
LA-11.07	Existing Environment	The ES adequately characterises the baseline environment for light pollution in terms of human health.	Agreed	Agreed	Not agreed – in discussion	Not agreed – in discussion	<p>As per <b>section 6.7.8.14, Chapter 6</b> (APP-054), operational lighting would include:</p> <ul style="list-style-type: none"> <li>• Security lighting around perimeter fence of compound, to allow CCTV coverage, possibly motion sensitive;</li> <li>• Car park lighting – as per standard car park lighting, possibly motion sensitive; and</li> </ul>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<ul style="list-style-type: none"> <li>Repair / maintenance – task related flood lighting will be necessary.</li> </ul> <p>Within the response to Section 42 consultation presented within <b>Appendix 6.1</b> (APP-450), the Applicants confirm that no operational site floodlighting is included for the East Anglia TWO or East Anglia ONE North substation.</p> <p>It is noted that there is no requirement for permanent lighting at the substation during operation. As such, no assessment of operational lighting was undertaken within the EIA.</p>
LA-11.08	Existing Environment	The ES adequately characterises the baseline environment for EMFs in terms of human health.	Agreed	Agreed	Agreed	Agreed	None.
LA-11.09	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the Projects on human health and are compliant with regulatory policy and guidelines.	Agreed	Agreed	Agreed	Agreed	Public Health England (PHE) were consulted and agreed that the assessment methodologies were appropriate (see <b>section 27.4.3.4 of Chapter 27 Human Health</b> (APP-075)). A cumulative impact assessment has



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							been undertaken ( <b>section 27.4.4 of Chapter 27 Human Health</b> (APP-075)) on the inter-project cumulative effects, again following the method statement agreed with PHE.
LA-11.10	Assessment Methodology	The realistic worst case scenario for one project in terms of the largest development footprint as set out in <b>Table 27.3 Chapter 27 Human Health</b> (APP-075) and utilised in the human health impact assessment is appropriate.	Agreed	Agreed	Not Agreed – in discussion	Not Agreed – in discussion	<p>Air Quality – Agreed and the Councils note that worst case scenario for air quality relates to traffic flows.</p> <p>Noise – The Councils maintain that the impact of the noise from the new National Grid infrastructure should be included within the assessment (see LA-08.08 (REP1-072)).</p> <p>EMFs – Agreed.</p> <p>The Councils consider that the noise assessment does not include the National Grid infrastructure which could be a contributing noise source and therefore does not represent the worst-case scenario.</p> <p>A longer less intense construction period would be preferable to a shorter intense one, and every effort should be made to</p>





ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>minimise the impact of noise and traffic on local residents.</p> <p>The Applicants note that, as per <b>Table 25.2, Chapter 25</b> of the ES (APP-073), the equipment required at the National Grid substation for operation does not include components which would contribute any significant noise contributions within the area. This matter remains under discussion (see LA-08.08 (REP1-072)) and the Applicants will provide further information on National Grid operational noise levels within a Noise Modelling Clarification Note to be submitted at Deadline 4.</p>
LA-11.11	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Not Agreed – in discussion	Not Agreed – in discussion	An assessment of impacts of decommissioning is not presented. <b>Section 27.6.4 of Chapter 27 Human Health</b> (APP-075) states that impacts are expected to be no greater than for the construction phase. However, it is noted that demolition processes would differ from construction processes.



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							As noted within each respective onshore ES chapter, at this stage the specific activities required for decommissioning are not clearly defined. For the purposes of the assessment, onshore decommissioning activities were assumed to be the same or similar to onshore construction activities. However, the Applicants note that details regarding the methods for decommissioning will be set out within an onshore decommissioning plan secured by Requirement 30 of the <b>draft DCO</b> (APP-023), which will require the approval from the relevant planning authority prior to any such works commencing.
LA-11.12	Assessment Conclusions	The assessment of impacts for construction, maintenance and decommissioning noise effects on terrestrial environments in terms of human health presented for one project are appropriate.	Agreed	Agreed	Not Agreed – in discussion	Not Agreed – in discussion	The Councils do not agree with the conclusions of the construction noise assessment, as per the notes at LA-09.09 (REP1-072).



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
LA-11.13	Assessment Conclusions	The assessment of impacts for operational noise and vibration effects on terrestrial environments in terms of human health presented for one project are appropriate.	Agreed	Agreed	Not Agreed – in discussion	Not Agreed – in discussion	The Councils do not agree with the conclusions of the operational noise assessment, as per the notes at LA-08.12 (REP1-072).
LA-11.14	Assessment Conclusions	The assessment of impacts for air quality during construction and impact on the AQMA in terms of human health presented for one project are appropriate.	Agreed	Agreed	Not Agreed – in discussion	Not Agreed – in discussion	The Applicants note that this matter remains under discussion with the Councils and will be updated within future iterations of this SoCG.
LA-11.15	Assessment Conclusions	The assessment of impacts for light pollution in terms of human health presented for one project are appropriate.	Agreed	Agreed	Not Agreed – in discussion	Not Agreed – in discussion	As per <b>section 6.7.8.14, Chapter 6</b> (APP-054), operational lighting would include: <ul style="list-style-type: none"> <li>• Security lighting around perimeter fence of compound, to allow CCTV coverage, possibly motion sensitive;</li> <li>• Car park lighting – as per standard car park lighting, possibly motion sensitive; and</li> <li>• Repair / maintenance – task related flood lighting will be necessary.</li> </ul>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>Within the response to Section 42 consultation presented within <b>Appendix 6.1</b> (APP-450), the Applicants confirm that no operational site floodlighting is included for the East Anglia TWO or East Anglia ONE North substation.</p> <p>It is noted that there is no requirement for permanent lighting at the substation during operation. As such, no assessment of operational lighting was undertaken within the EIA.</p>
LA-11.16	Assessment Conclusions	The assessment of impacts for EMFs in terms of human health presented for one project are appropriate.	Agreed	Agreed	Agreed	Agreed	None.
LA-11.17	Assessment Conclusions	The assessment of socio-economic impacts in terms of human health presented within the assessment are appropriate.	Agreed	Agreed	Agreed	Agreed	Refer to LA-16.05 and LA-16.06 (REP1-072).
LA-11.18	Assessment Conclusions	The assessment of recreation (i.e. use of physical environment) impacts in terms of human health presented within the assessment are appropriate.	Agreed	Agreed	Not Agreed – in discussion	Not Agreed – in discussion	Maintaining access to footpaths and rights of way is important to enable active travel and outdoor leisure activities, both of which are hugely



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>beneficial for physical and mental health. As outlined in <b>section 27.5.5</b> of <b>Chapter 27 Human Health</b> (APP-075), many adults in Suffolk Coastal exercise in outdoor space. <b>Table 27.7</b> acknowledges loss of access to green space and <b>Table 27.4</b> specifies that the site selection minimises footpath closures but does not specify whether these closures are temporary (during the construction phase) or permanent.</p> <p>The Councils consider that there are no commitments to mitigate the impact by provision of alternative routes/alternative access. The cumulative impact of any loss of footpaths/rights of way/access to outdoor space in the areas of the East Anglia ONE North and East Anglia Two construction and other developments (Nautilus and Eurolink Interconnectors) needs to be addressed.</p> <p>The Applicants note that Public Right of Way (PRoW) diversions are in themselves mitigation measures to address potential impacts identified upon</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>PRoW (i.e. Temporary or permanent stopping up). PRoW diversions are set out within the <b>Temporary Stopping up of PRoW Plan</b> (APP-013) and the <b>Permanent Stopping up of PRoW Plan</b> (APP-014), which should be read in conjunction with Schedule 3 of the <b>draft DCO</b> (APP-023).</p> <p>The Applicants are continuing to work with the Councils regarding this matter and have submitted a <b>PRoW Clarification Note</b> to the Examinations at Deadline 1 (REP1-049) and an updated <b>Outline PRoW Strategy</b> to the Examinations at Deadline 3 (document reference 8.4).</p>
LA-11.19	Assessment Conclusions	The assessment of cumulative impacts between East Anglia ONE North and East Anglia TWO are appropriate.	Agreed	Agreed	Not Agreed – in discussion	Not Agreed – in discussion	<p><b>Table 27.48 of Chapter 27 Human Health</b> (APP-075) considers the location of groups susceptible to intra-project cumulative effects. The Councils consider that this table should also include locations close to transportation routes (e.g. in Stratford St Andrew AQMA). The Councils also believe that</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>this table should include consideration of an additional population group: home workers. Home working will be more common post-Covid and this group will be sensitive to excess noise.</p> <p>Whilst it is noted Covid has likely increased home-working temporarily, any permanent impacts of this are unknown.</p> <p>Noise – the Councils do not agree with the conclusions of the construction or operational noise assessment, as per the notes at LA-08.13 (REP1-072).</p> <p>EMFs – the Councils agree the cumulative assessment in relation to the EMF effects is appropriate.</p>
LA-11.20	Assessment Conclusions	The assessment of cumulative impacts with future projects are appropriate.	Agreed	Agreed	Not Agreed – in discussion	Not Agreed – in discussion	Air Quality - <b>Section 27.7.3.1.1.2 of Chapter 27 Human Health</b> (APP-075) considers cumulative air quality impacts with Sizewell B decommissioning and Sizewell C construction, and concludes: <i>“Cumulative road traffic emission impacts were not predicted to be significant for human receptors when considered</i>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p><i>qualitatively alongside Sizewell C New Nuclear Power Station.”</i> The Councils consider that there is no quantitative assessment of cumulative health impacts. Yet the conclusion is drawn that cumulative impacts would not be significant. This requires proper evaluation and explanation of the evidence used to reach this conclusion.</p> <p>The Applicants have since submitted a <b>Sizewell C Cumulative Impact Assessment Note (Traffic and Transport)</b> to the Examinations at Deadline 2 (REP2-009). This note provides consideration of potential air quality impacts associated with cumulative traffic and transport impacts, concluding that predicted cumulative pollutant concentrations are all sufficiently below the relevant national air quality objectives and significant impacts are therefore unlikely.</p> <p>It should be noted that the Councils are currently reviewing the additional information provided in relation to the</p>





ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>cumulative assessment of the Projects with Sizewell C.</p> <p>Noise - the Councils do not agree with the conclusions of the construction or operational noise assessment (see LA-08.15 and LA-09.15 (REP1-072)).</p> <p>The Councils understand that National Grid Electricity System Operator (NG-ESO) has offered grid connections to a number of projects which are anticipated in the future (namely the Nautilus Interconnector; the Eurolink Interconnector and the Galloper Extension (now known as the Five Estuaries)) and that a further connection offer is also likely to be made to the Greater Gabbard Extension. The intention is for these projects to connect to the National Grid substation proposed at Grove Wood, Friston which is part of the East Anglia ONE North and East Anglia TWO Applications. That would result in the enlargement/extension of the National Grid substation.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<p>The Councils maintain that the future energy projects which have been (or are likely to be) granted grid connection offers by NG-ESO should be included in the cumulative impact assessments for East Anglia ONE North and East Anglia TWO. While full information may not yet be available, National Grid is likely to be able to provide information on the effects of further grid connections on the National Grid Infrastructure proposed at Friston.</p> <p>At the date of this SoCG, the Applicants understand that neither the Nautilus nor the EuroLink projects are at a sufficient stage of project definition to confirm whether the National Grid substation will present a viable option for their connection to the national electricity grid. This may or may not be at Grove Wood, Friston. The Five Estuaries offshore windfarm connection agreement is a pre “Connections and Infrastructure Options Note” (CION) connecting agreement, meaning that an economic and</p>



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							<p>environmental appraisal of this connection is yet to be undertaken by NG-ESO and the Five Estuaries offshore windfarm developer. The Applicants understand that the Greater Gabbard Extension does not yet have a grid connection agreement with NG-ESO and therefore it is inappropriate to assume that this connection will be at Grove Wood, Friston.</p> <p>The Applicants consider that the assessment of cumulative impacts of existing and potential future projects is robust. A cumulative impact assessment (CIA) has been carried out for each of the considered receptor topics in <b>Chapters 7 to 30</b> of the ES' (APP 055-078). The approach used for the CIA follows Planning Inspectorate Advice Note 17.</p> <p>Following the guidance in Advice Note 17, the Nautilus; EuroLink; Greater Gabbard Offshore Windfarm Extension; and Galloper Offshore Windfarm Extension were not considered in the</p>



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							CIA because at the time the Projects' 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).
LA-11.21	Mitigation	The embedded mitigation set out within Section 27.3.4 and Section 27.3.5 of the Environmental Statement is appropriate and sufficient in terms of human health.	Agreed	Agreed	Not Agreed – in discussion	Not Agreed – in discussion	<p>Air Quality – The Council request the establishment of a Construction Traffic Management Group and associated monitoring (see LA-04.31 (REP1-072)).</p> <p>Noise – The Councils do not agree with the embedded mitigation, as per the notes at LA-08.16 and LA-09.16 (REP1-072).</p> <p>The embedded EMF mitigation is considered acceptable.</p> <p>The Councils note the following:</p> <ul style="list-style-type: none"> <li>• <b>Table 27.4 of Chapter 27 Human Health</b> (APP-075): Construction: specifies that best practice and techniques have been used to avoid or reduce impacts on health.</li> </ul>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							<ul style="list-style-type: none"> <li>• <b>Table 27.4</b> 'Perception of risk' outlines the iterative process in collecting community feedback on perception of risk. It does not however specify how the feedback has informed the design development and the extent to which concerns may have been addressed, and if not transparent this may lead to continued concerns around risk.</li> <li>• <b>Section 27.3.5:</b> post-consent design and monitoring will need to take into account the cumulative impact of neighbouring projects.</li> <li>• Every effort should be made to minimise disruption to public rights of way, and it would be helpful if an assessment was undertaken into the volume of people using the existing PRow. This would help ensure any necessary short-term disruption to access would affect the minimum number of people. It would be helpful to see a commitment to increasing</li> </ul>



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							<p>connectivity for local residents and the opening of alternative routes before any temporary or permanent closure of existing ones.</p> <p>Article 11, Part 3 of the <b>draft DCO</b> (APP-023) stipulates that the PRoW specified within Schedule 3 must not be stopped up unless the alternative public right of way specified within Schedule 3 have first been provided to the standard defined within the final PRoW Strategy, which in turn must be approved by the relevant planning authority prior to the commencement of the authorised development.</p> <p>The Applicants note that PRoW diversions are in themselves mitigation measures to address potential impacts identified upon PRoW (i.e. Temporary or permanent stopping up). PRoW diversions are set out within the <b>Temporary Stopping up of PRoW Plan</b> (APP-013) and the <b>Permanent Stopping up of PRoW Plan</b> (APP-014),</p>



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							which should be read in conjunction with Schedule 3 of the <b>draft DCO</b> (APP-023).
<b>Draft Development Consent Order (DCO)</b>							
LA-11.22	Wording of Requirement(s)	The wording of Requirement 22 provided within the draft DCO (and supporting certified documents) with reference to development of a Code of Construction Practice for the mitigation and monitoring of potential impacts on human health is appropriate and adequate.	Agreed	Agreed	Not Agreed – in discussion	Not Agreed – in discussion	<p>Air Quality – The Councils would like the Air Quality Management Plan section of the <b>Outline Code of Construction Practice</b> (APP-578) updated to include reference to the CTMG and monitoring of Stratford St Andrew Air Quality Management Area (AQMA).</p> <p>The Applicants are considering whether they can enter into a Construction Traffic Management Group. An updated <b>Outline CoCP</b> has been submitted to the Examinations at Deadline 3 (document reference 8.1).</p> <p>The Applicants refer to the notes at statements LA-04.31 and LA-04.32 (REP1-072).</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited	ESC Position	SCC Position	Notes
							Noise – the Councils do not agree as the CoCP does not include preparation works (see LA-09.17 (REP1-072)).
LA-11.23	Wording of Requirement(s)	Requirements 26 and 27 of the draft DCO (and supporting certified documents) for the mitigation of operational impacts with respect to noise and vibration of one project alone and cumulative operational impacts respectively, are considered appropriate and proportionate.	Agreed	Agreed	Not Agreed – in discussion	Not Agreed – in discussion	The Councils do not agree with the wording of Requirement 26 or Requirement 27, as per the notes at LA-08.17 and LA-08.18 (REP1-072).
<b>Other Matters as Required</b>							
N/A							None





### 3 Signatures

20. The above Statement of Common Ground is agreed between East Anglia TWO Limited, East Anglia ONE North Limited, East Suffolk Council and Suffolk County Council on the day specified below.

Signed: _____
Print Name: _____
Job Title: _____
Date: _____
Duly authorised for and on behalf of <b>East Suffolk Council</b>
Signed: _____
Print Name: _____
Job Title: _____
Date: _____
Duly authorised for and on behalf of <b>Suffolk County Council</b>
Signed: _____
Print Name: _____
Job Title: _____
Date: _____
Duly authorised for and on behalf of <b>East Anglia TWO Limited</b>



Signed: \_\_\_\_\_

Print Name: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

Duly authorised for and on behalf of **East Anglia ONE North Limited**

DRAFT