



SCOTTISHPOWER
RENEWABLES

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Draft Statement of Common Ground Substation Action Save East Suffolk

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

DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
ETG	Expert Topic Group
GLVIA	Guidelines for Landscape and Visual Impact Assessment
LVIA	Landscape and Visual Impact Assessment
OLEMS	Outline Landscape Management Strategy
PRoW	Public Rights of Way
RHLA	Rapid Historic Landscape Assessment
SASES	Substation Action Save East Suffolk
SoCG	Statement of Common Ground

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Glossary of Terminology

Applicants	East Anglia TWO Limited / East Anglia ONE North Limited
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 TWO / ONE North project	The proposed project consisting of up to 75 (East Anglia TWO) or 67 (East Anglia ONE North) 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 / ONE North windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
Mitigation areas	Areas captured within the onshore development area specifically for mitigating expected or anticipated impacts.
National electricity grid	The high voltage electricity transmission network in England and Wales owned and maintained by National Grid Electricity Transmission
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order but will be National Grid owned assets.
National Grid overhead line realignment works	Works required to upgrade the existing electricity pylons and overhead lines (including cable sealing end compounds and cable sealing end (with circuit breaker) compound) to transport electricity from the National Grid substation to the national electricity grid.
National Grid 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.
Offshore development area	The East Anglia TWO / East Anglia ONE North windfarm site and offshore cable corridor (up to Mean High Water Springs).
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.

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1 Introduction

1.1 Background

1. This Statement of Common Ground (SoCG) has been prepared by East Anglia TWO Limited, East Anglia ONE North Limited (the Applicants) and Substation Action Save East Suffolk (SASES) 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.
2. 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.
3. In Procedural Decision 15 contained in Annex F of the Rule 6 Letter (PD-013), the Examining Authority requested that the Applicants enter into a SoCG with SASES on the following topics:
 - Access, highways and transportation;
 - Other Consequential Onshore Effects (defined as economic and tourism effects in Annex G of Procedural Decision 7 (PD-006));
 - Historic environment;
 - Recreational use of the foreshore;
 - Landscape and visual;
 - Flood risk;
 - Construction and operational noise; and
 - Air quality.
4. At the Preliminary Meeting (Part 1) on 16th September 2020, Mr Richard Turney, on behalf of SASES, advised that SASES wish to enter into a SoCG covering the following topics only:
 - Historic environment;
 - Landscape and visual;
 - Flood risk; and
 - Noise.



5. This SoCG therefore only covers those topics specified by SASES at the Preliminary Meeting (Part 1). Topic specific matters agreed, not agreed and actions to resolve matters between the Applicants and SASES are included within this SoCG.
6. The tables presented below represent the SoCG with the Applicants and SASES in respect of the topics listed above.
7. Matters that are not yet agreed will be the subject of ongoing discussion between the Applicants and SASES to reach agreement on the matters wherever possible, or to refine the extent of disagreement between parties. The notes column of the SoCG tables provides commentary on these matters.
8. This document is applicable to both the East Anglia TWO and East Anglia ONE North 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.

1.2 The Development

9. 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.
10. 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; and
- Electrical cable connection between the onshore substation and National Grid substation.

11. 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; and
- 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.

1.3 Summary of Agreed, Not Agreed and Outstanding Matters

12. **Table 1** provides a summary of the matters agreed, not agreed and those which are outstanding between the Applicants and SASES for each of the relevant SoCG topic areas. For further information on agreements that are outstanding / under discussion and for which the Applicants and SASES are working to address during the Examination period, please refer to the Notes column of the tables below.

Table 1 Summary of Agreed, Not Agreed and Outstanding Matters

Topic	Agreed, Disagreed or Outstanding
Historic environment	Outstanding
Landscape and visual	Outstanding
Flood risk	Outstanding
Construction and operational noise	Outstanding



2 Statement of Common Ground

13. A summary of the consultation undertaken to date with SASES and the matters agreed or not agreed between the Applicants and SASES (based on discussions and information exchanged between the Applicants and SASES during the pre-application and examination phases of the Applications) are set out below.
14. **Table 2** provides an overview of meetings and correspondence undertaken with SASES.
15. Further details on the stakeholder engagement can be found in the **Consultation Report** (APP-029).

Table 2 Summary of Consultation with SASES

Date	Contact Type	Topic
18 th July 2018	Meeting	Meeting with Friston Working Group
10 th December 2018	Meeting	Project Update Meeting
12 th July 2019	Workshop	Friston Community Workshop
28 th August 2020	Letter	Letter of intent to enter into SoCG issued



2.1 Historic Environment

16. **Table 3** provides areas of agreement and disagreement regarding historic environment.

Table 3 Historic Environment

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
Environmental Impact Assessment						
SASES-301	Existing Environment	Sufficient survey data has been collected to inform the assessment.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>Onshore Archaeology: The desk-based assessment is adequate, but the coverage of the geophysical survey is not complete and there is a need for trial-trenching to confirm the result of the geophysics and evaluate the areas which could not be surveyed. SASES defer to Suffolk County Council as the lead authority on this issue.</p> <p>Cultural Heritage: The baseline desk-based assessment is adequate, although several significant features, including the parish / hundred boundary to the north of the church have been overlooked.</p> <p><u>Applicants' Response</u></p> <p>Onshore Archaeology: The Applicants note that East Suffolk Council (ESC) and Suffolk County Council (SCC) (the Councils) have agreed that sufficient non-intrusive survey data has been collected to inform the assessment (see LA-06.02 of REP1-072). Agreement is yet to be reached regarding the degree of intrusive survey data (see LA-06.05 of REP1-072).</p>



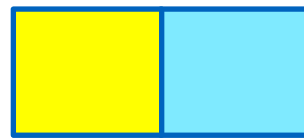
ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>REP1-025 – REP1-033 provide information on the geophysical surveys, trial trenching and earthworks carried out to inform further stages of post-consent survey; the Applicants consider these to be adequate for the purposes of the EIA.</p> <p>It is the view of the Applicants that the commitment to 5% sampling of the onshore development area (being progressed with ongoing consultation with the Councils), will provide sufficient intrusive survey data. Further information on the preliminary trial trenching surveys can be found in the following documents submitted at Deadline 1:</p> <ul style="list-style-type: none"> • Pre-Construction Trial Trenching Report (REP1-023); • Onshore Archaeology Geophysical Survey Reports 1-9 (REP1-025 – REP1-033); and • Onshore Archaeology Earthworks Report (REP1-034) <p>Further trial trenching at strategic locations will be undertaken in 2021.</p> <p>Cultural Heritage: The EIA desk based study, Appendix 24.3 - Onshore Archaeology and Cultural Heritage Desk Based Assessment and Annexes (APP-514), identified heritage features (including the parish / hundred boundary to the north of the church) and further information regarding these heritage features is presented within the Onshore Archaeology and Cultural Heritage Clarification Note submitted at Deadline 1 (REP1-021). The Applicants note that some</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						matters remain under discussion with the Councils (LA-07.01 of REP1-072).
SASES-302	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project.	Agreed	Agreed	Agreed	<p><u>SASES Comments</u></p> <p>The stated approaches to be taken are adequate, but see further comments below on their application, which results in an underestimation of the impact on cultural heritage.</p> <p><u>Applicants' Response</u></p> <p>The Applicants welcome SASES' agreement on this matter and note that this is also agreed with the Councils (LA-06.08 and LA-07.03 of REP1-072). The Applicants have provided notes in response to SASES' further comments at the appropriate IDs.</p>
SASES-303	Assessment Methodology	The worst case scenario presented in the assessment is appropriate.	Agreed	Agreed	Agreed	None.
SASES-304	Assessment Conclusions	The ES adequately characterises the baseline environment in terms of archaeology and cultural heritage.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>Onshore Archaeology: Without the baseline geophysical survey data and trial trenching referred to above, the baseline archaeological character of the environment cannot be adequately characterised.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>Cultural Heritage: The desk-based elements of the project provide an adequate characterisation of the baseline environment, although some features, such as the parish/hundredal boundary, are overlooked.</p> <p>Applicants' Response</p> <p>Onshore Archaeology: See notes for SASES-301.</p> <p>Cultural Heritage: The EIA desk based study, Appendix 24.3 - Onshore Archaeology and Cultural Heritage Desk Based Assessment and Annexes (APP-514), identified heritage features (including the parish / hundred boundary to the north of the church) and further information regarding these heritage features is presented within the Onshore Archaeology and Cultural Heritage Clarification Note submitted at Deadline 1 (REP1-021).</p>
SASES-305	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Not Agreed	<p>SASES Comments</p> <p>Onshore Archaeology: Without the baseline survey data referred to above, the impact of the scheme on buried archaeology cannot be adequately assessed.</p> <p>Cultural Heritage: The impact assessment is limited to the operational phase of the project, and does not consider the impacts of the construction or phases on cultural heritage. Scoping these phases out of consideration is not considered to be appropriate.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>The impact assessment focusses primarily on designated heritage assets, with little or no consideration given to non-designated heritage assets.</p> <p>The approach taken to impact on the setting of heritage assets is primarily visual, rather than experiential, and fails to address the impacts of noise, vibration, change in landscape character, severance, etc. Setting tends only to be defined in terms of physical distances and there is a strong emphasis on public viewpoints, which is incorrect.</p> <p><u>Applicants' Response</u></p> <p>Onshore Archaeology: See notes for SASES-301.</p> <p>Cultural Heritage: The 'scoping out' of construction works was discussed and agreed with the Expert Topic Group (ETG) and was agreed with Historic England through the SoCG process (REP1-059). The Applicants note that this statement has been agreed with the Councils (see LA-07.07 of REP1-072). The Councils have also agreed the following statement at LA-07.05 (REP1-072): <i>"The approach to scoping out construction phase impacts upon the setting of heritage assets from further, more detailed assessment is appropriate"</i>.</p> <p>Construction works that would result in material permanent change in the setting of heritage assets have been considered in the assessment of operational impacts (See ID 26 of <i>Applicants' Comments on SASES' Deadline 1 Submissions</i>, submitted at Deadline 3 (document reference REP3-072) for further detail.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
SASES-306	Assessment Conclusions	<p>The assessment of cumulative impacts is consistent with the agreed methodologies.</p> <ul style="list-style-type: none"> 	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The consideration of the potential impacts of the operational phases of EA1N and/or EA2 schemes are adequately considered. The construction and decommissioning phases are not (see above comments).</p> <p>There is no consideration of the potential impacts of other offshore energy infrastructure projects which may result in additional development at Friston. Such schemes potentially include the National Grid Ventures projects Nautilus and Eurolink, the Five Estuaries windfarm project, the North Falls windfarm project and the National Grid SCD1 and SCD2 projects.</p> <p><u>Applicants' Response</u></p> <p>See notes for SASES-305. Paragraph 12 of the SoCG with the Councils (REP1-072) sets out the Applicants' position with regard to cumulative impact assessment and the other energy infrastructure projects listed.</p>
SASES-307	Mitigation	<p>The embedded, initial informative and additional mitigation proposed within section 24.3.3 of the ES are appropriate.</p>	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The submitted documents demonstrate that the mitigation measures put forward in the proposed Outline Landscape Mitigation Plan effectively do nothing to reduce the heritage impacts of the scheme in any meaningful way. In six of the seven instances where harm is identified to designated heritage assets, the applicant acknowledges that the proposed mitigation planting will be of such negligible effect that even</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>after 15 years it will not have had sufficient effect to reduce the assessment of harm caused to any of the heritage assets. The proposed mitigation scheme is not fit for purpose and will not reduce the heritage harm.</p> <p><u>Applicants' Response</u></p> <p>The Applicants refer to the notes at LA-07.12 within the SoCG with the Councils regarding mitigation (REP1-072). Since submission of the Applications the Applicants have made a number of design changes to the onshore substations. An updated Outline Landscape Management Plan was submitted at Deadline 3 (within the <i>Outline Landscape and Ecological Management Strategy</i> (OLEMS) (REP3-030) along with a selection of updated visualisations within the <i>Updated Photomontages Clarification Note</i> (document reference ExA.AS-16.D3.V1). Further updates and detail will be submitted at Deadline 4. The Applicants disagree with SASES' comment regarding the mitigation planting being unfit for purpose. It is the Applicants' view that the mitigation planting proposals presented in the <i>OLEMS</i> have been designed to be historically appropriate and would reduce the effects,</p>



2.2 Landscape and Visual

17. **Table 4** provides areas of agreement and disagreement regarding landscape and visual.

Table 4 Landscape and Visual

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
Environmental Impact Assessment						
SASES -501	Existing Environment	Sufficient survey data has been collected to inform the assessment.	Agreed	Agreed	Not Agreed	<p>SASES Comments</p> <p>The [Landscape and Visual Impact Assessment] LVIA recognises that the landscape in the Friston area has a strong sense of place and local distinctiveness. The LVIA acknowledges that value is derived from the setting the landscape provides to the parish of Friston, the characteristic arrangement of the parish, the village and outlying farmsteads.</p> <p>However, insufficient value has been placed on the relationship between the village and the landscape to the north of the village. This historic landscape character importance of this is confirmed in the report prepared by SCC Archaeological Service (Appendix 1 to the ESC and SCC Joint LIR for EA1N and EA2 Projects PINS ref EA1N – EN010077 & EA2 – EN010078).</p> <p>It is clear from the response by the Applicant in EN010077-002590-ExAAS10D1V1EA1NEA2 CulturalHeritageClarificationNote_378411_1 that insufficient attention was given to this factor. The presence of large scale modern interventions in the landscape, such as the overhead</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>power lines, is unduly emphasised in this document. It is not a defining characteristic of the landscape.</p> <p>Applicants' Response</p> <p>The Onshore Archaeology and Cultural Heritage Clarification Note submitted at Deadline 1 (REP1-021) has been prepared to ensure due regard has been given to the SCC's Rapid Historic Landscape Assessment (RHLA) (Appendix 1 to the Councils' Local Impact Report), which was provided to the Applicants following submission of the Applications. The RHLA provides some interesting further insight, although the Applicants have some reservations about the conclusions which have been drawn. It is the Applicants' view that comprehensive and robust consideration of the historic trackway has been completed in the ES and supporting documents described and signposted in section 1.2 of REP1-021.</p>
SASES -502	Assessment Methodology	The impact assessment methodologies used for the LVIA provide an appropriate approach to assessing potential effects of the Projects.	Agreed	Agreed	Not Agreed	<p>SASES Comments</p> <p>Although the LVIA identifies the sensitivity of the receptors on a scale of low-high and the magnitude of change on a scale of negligible to high, the overall impact is described only as 'significant' or 'not significant'. (Table 29.5 Significance Matrix Page 30).</p> <p>This is not helpful in understanding the scale of the impacts as a significant impact (based on Table A29.5 Impact Significance Matrix – Landscape Effects in EN010077-001531-6.3.29.2 EA1N ES Appendix</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>29.2 LVIA Methodology) could range from a moderate to a major impact.</p> <p><u>Applicants' Response</u></p> <p>The matrix presented in Table 29.5 of the ES (APP-077) acts as a tool to aid assessment decisions. The assessment methodology used for the LVIA follows Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) (Landscape Institute and Institute for Environmental Management and Assessment, 2013). GLVIA3 states that <i>“the regulations require that a judgement is made about whether or not each effect is significant”</i>, and that <i>“there are no hard and fast rules about what effects should be deemed significant, but LVIAs should always distinguish clearly between what are considered to be the significant and non-significant effects”</i>. GLVIA3 further notes that <i>“it is not essential to establish a series of thresholds for different levels of significance...provided it is made clear whether or not they are considered significant”</i>.</p> <p>More detail will be contained within a second volume of the Applicants' Comments on SASES' Deadline 1 Submissions to be submitted at Deadline 4.</p> <p>The Applicants note that this same statement has been agreed by the Councils (see LA-13.03 of REP1-072).</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
SASES-503	Assessment Methodology	The worst case scenario presented in the assessment is appropriate.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The assessment has not taken full account of the additional harm that would result if the SPR substations were built consecutively which could take at least 6 years assuming the National Grid connection hub works are conducted in the same period.</p> <p>The assessment has not taken full account of the delay to the post construction mitigation planting (which represents the bulk of the mitigation planting) if the SPR substations were constructed consecutively.</p> <p>The assessment has not considered the cumulative effects of other developments which may come forward in association with National Grid infrastructure at Friston.</p> <p><u>Applicants' Response</u></p> <p>The Applicants note that the equivalent statement has been agreed by the Councils (see LA-13.05 of REP1-072). The Applicants believe that the assessment of cumulative effects presented within Appendix 29.5 of the ES (APP-569) fully considers the sequencing of works between the Projects. Paragraph 12 of the SoCG with the Councils (REP1-072) sets out the Applicants' position with regard to cumulative impact assessment and a number of other energy projects.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
SASES-504	Assessment Conclusions	The ES adequately characterises the baseline environment in terms of landscape and visual amenity.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>Insufficient weight has been given to the amenity value of marinating the integrity of the public right of way (PRoW) network to the north of the village.</p> <p><u>Applicants' Response</u></p> <p>See notes for SASES-501. This matter remains under discussion with the Councils (See LA-13.07 of REP1-072). The Applicants note that further measures regarding PRoW were included in the updated <i>Outline PRoW Strategy</i> (document reference 8.4) submitted at Deadline 3.</p>
SASES-505	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>For the reasons given above.</p> <p>In addition, the assumed growth rates for the mitigation planting are considered to be unrealistic (See report from Jon Rose- REP1-365) and therefore the assumptions about how long it will be before the mitigation planting is effective in screening are also unrealistic.</p> <p><u>Applicants' Response</u></p> <p>The Applicants note that the matter of planting growth rates remains under discussion with the Councils (see LA-13.11, LA-13.15, LA-13.16 and LA-13.26 of REP1-072). In response to this matter, within the</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						updated OLEMS (document reference 8.7) submitted at Deadline 3 the Applicants have committed to an adaptive planting aftercare period.
SASES -506	Assessment Conclusions	The assessment of cumulative impacts s consistent with the agreed methodologies.	Agreed	Agreed	Not Agreed	<p>SASES Comments</p> <p>The cumulative effects of other developments which will come forward in association with National Grid infrastructure at Friston have not been considered. In particular the projects with actual or likely connection offers to the National Grid substation proposed at Friston should be considered namely Nautilus, Eurolink, North Falls, Five Estuaries, SCD1 and SCD2.</p> <p>Applicants' Response</p> <p>Paragraph 12 of the SoCG with the Councils (REP1-072) sets out the Applicants' position with regard to cumulative impact assessment and a number of other energy projects.</p>
SASES -507	Mitigation	The embedded mitigation set out within section 28.3.3 and section 28.3.4 of the ES is appropriate and sufficient.	Agreed	Agreed	Not Agreed	<p>SASES Comments</p> <p>The LVIA accepts that even with the mitigation proposed the effects will remain at moderate/major adverse for the lifetime of the substations.</p> <p>Improved mitigation might be achieved if:</p> <ul style="list-style-type: none"> • It was agreed that the construction of both SPR substations and the NG substation was undertaken concurrently; • A genuine micro-siting exercise was undertaken which identified and worked with the grain of the landscape to assess whether a



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>smaller more irregular footprint could accommodate the required equipment;</p> <ul style="list-style-type: none"> • Consideration was given to consolidating some of the elements to achieve a smaller footprint; • Priority was given to mitigating the impact on Friston village, even if this might move the substations closer to Grove Road; • An enhancement programme was prepared which looked at improving the wider landscape rather than merely hiding views of the substations. • An intensive and continuous maintenance (including irrigation) with regard to mitigation planting as recommended by an independent arboriculturalist familiar with the local environment. <p><u>Applicants' Response</u></p> <p>At Deadline 3 the Applicants submitted an <i>Onshore Substations Update Clarification Note</i> (ExA.AS-11.D3.V1) which outlined a number design changes to the onshore and National Grid substations and the environmental benefits of these changes. These include:</p> <ul style="list-style-type: none"> • Reduction in the footprint of each of the onshore substations and their resulting relocation (as summarised in the <i>Project Update Note</i> (REP2-007) submitted at Deadline 2); • Lowering of the finished ground levels at the locations of the eastern onshore substations and National Grid substation (as



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>summarised in the Project Update Note for Deadline 3 (document reference ExA.AS-6.D3.V1); and</p> <ul style="list-style-type: none"> Reduction in the maximum heights of the buildings and external equipment at both onshore substations (as summarised in the Project Update Note for Deadline 3 (document reference ExA.AS-6.D3.V1)). <p>An updated Outline Landscape Management Plan was submitted at Deadline 3 (within the updated OLEMS (Document reference 8.7)) along with a selection of updated visualisations within the Updated Photomontages Clarification Note (document reference ExA.AS-16.D3.V1). The updated OLEMS includes an adaptive aftercare period with commitments regarding irrigation.. Further updates and detail is provided within the Outline Onshore Design Principles Statement (document reference ExA.AS-24.D4.V1) submitted at Deadline 4.</p>



2.3 Flood Risk

18. **Table 5** provides areas of agreement and disagreement regarding flood risk.

Table 5 Flood Risk

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
Environmental Impact Assessment						
SASES-601	Existing Environment	Sufficient survey data has been collected to inform the assessment.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The Applicant has failed to undertake a detailed survey of the upper watershed or village drainage flow routes and field drains, nor sample mobilised sediment or undertake infiltration testing.</p> <p><u>Applicants' Response</u></p> <p>The Applicants note that this same statement is agreed with the Councils (the Lead Local Flood Authority (LLFA)) (see LA-05.05 of REP1-072). The Applicants have committed to undertaking percolation tests post consent at detailed design. This is described in section 4.2 of the Outline Operational Drainage Management Plan (REP3-046) submitted at Deadline 3. The Applicants have drawn on the relevant findings of the catchment model undertaken by British Maritime Technology on behalf of SCC in 2020 to inform the Outline Operational Drainage Plan (see section 3.6.1.2).</p>
SASES-602	Assessment Methodology	The impact assessment methodologies used for the EIA provide an	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
		appropriate approach to assessing potential impacts of the project.				<p>There is inadequate assessment of the pluvial run-off flood risk posed to Friston village by both the permanent works and the construction phase of the project.</p> <p>This has resulted in site selection in an area suffering from on-going pluvial flood risk. The site selection methodology is flawed.</p> <p>The Applicant needs to reduce both PEAK flows and TOTAL flows to pre-development flows, not just PEAK flows.</p> <p>There needs to be detailed hydraulic modelling undertaken of baseline scenarios, sufficient detailed water management design to inform the impact modelling and demonstration that the mitigation measures are viable, manageable, effective and safe to the Village.</p> <p><u>Applicants' Response</u></p> <p>The Applicants refer to Row 18, Table 2.1 of the Applicants' Comments on SASES' Deadline 1 Submissions submitted to the Examination at Deadline 3 (document reference ExA.AS-20.D3.V1) where this matter is discussed in greater detail.</p>
SASES-603	Assessment Methodology	The worst case scenario presented in the assessment is appropriate.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The pluvial flood risk has been inadequately assessed so therefore so has the worst case scenario.</p> <p>The Climate change allowance for rainfall should be 40% - as per the SCC requirement.</p>



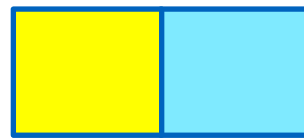
ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>The worst case scenario should be considered separately for construction phase and permanent works.</p> <p>The worst case needs to consider the catastrophic failure of any above ground attenuation ponds and their impact on the village.</p> <p>Applicants' Response</p> <p>The SCC design principles and climate change allowance of 40% is listed in section 2.2.5 of the Outline Operational Drainage Plan (REP3-046). This has been incorporated into the indicative SuDS design. As described in section 4.2, at detailed design a further sensitivity check will be carried out for a 1 in 100 year storm event with a 40% allowance for climate change to ensure there is no off-site flooding for this storm event.</p>
SASES-604	Assessment Conclusions	The ES adequately characterises the baseline environment in terms of flood risk.	Agreed	Agreed	Not Agreed	<p>SASES Comments</p> <p>The ES has fundamentally failed to adequately assess the pluvial flood risk posed to Friston Village – with inadequate surveying and inadequate methodology.</p> <p>Applicants' Response</p> <p>The Applicants note that this statement has been agreed by the Councils (see LA-05.03 of REP1-072). The Applicants refer to section 2.3 of the Applicants' Comments on SASES' Deadline 1</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						Submissions (document reference ExA.AS-20.D3.V1) where this matter is discussed in greater detail.
SASES-605	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Not Agreed	<p>SASES Comments</p> <p>The assessment of impacts across all phases of the proposed development of pluvial flood risk has been wholly inadequate – in terms of data used, target objectives and methodologies.</p> <p>Applicants' Response</p> <p>The Applicants note that this matter remains under discussion with the Councils (LA-05.11 of REP1-072), but refer to the further information provided within the Outline Operational Drainage Management Plan submitted at Deadline 3 (document reference ExA.AS-1.D3.V1). Updates to this document will be submitted at Deadline 4.</p>
SASES-606	Assessment Conclusions	The assessment of cumulative impacts is consistent with the agreed methodologies.	Agreed	Agreed	Not Agreed	<p>SASES Comments</p> <p>The assessment of cumulative impacts across all phases of the proposed development of pluvial flood risk has been wholly inadequate – in terms of data used, target objectives, and methodologies used, efficacy of generic mitigation measures, and lack of detailed design of mitigation measures.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>There has not been an assessment which addresses the impact of future projects, namely Nautilus, Eurolink, North Falls, Five Estuaries, SCD1 and SCD2.</p> <p><u>Applicants' Response</u></p> <p>Paragraph 12 of the SoCG with the Councils (REP1-072) sets out the Applicants' position with regard to cumulative impact assessment and a number of other energy projects.</p>
SASES-607	Mitigation	The embedded mitigation set out within Section 20.3.3 and the monitoring within Section 20.3.4 of the ES is appropriate and sufficient.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The assessment of mitigation measures across all phases of the proposed development of pluvial flood risk has been wholly inadequate – in terms of data used, target objectives, methodologies used, efficacy of generic mitigation measures, and lack of detailed design of mitigation measures.</p> <p><u>Applicants' Response</u></p> <p>The Applicants refer to the <i>Outline Operational Drainage Management Plan</i> submitted at Deadline 3 (document reference ExA.AS-1.D3.V1). Updates to this document will be submitted at Deadline 4.</p>

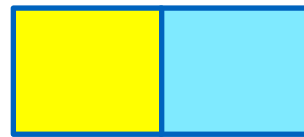


2.4 Construction and Operational Noise

19. **Table 6** provides areas of agreement and disagreement regarding construction and operational noise

Table 6 Noise

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
Environmental Impact Assessment						
SASES-701	Existing Environment	Sufficient survey data has been collected to inform the assessment.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>Background noise measurements are reported which will have been “under-range” for the measurement instrumentation used, and therefore in the cases where there were such low background levels true results have not been obtained.</p> <p><u>Applicants’ Response</u></p> <p>The Applicants refer to the <i>Applicants’ Response to Appendix 4 of the Local Impact Report</i> submitted to the Examinations at Deadline 3 (document reference ExA.AS-19.D3.V1) for further information regarding this matter.</p>
SASES-702	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The construction noise methodology as applied is not appropriate because it misinterprets the advice given in the relevant standards, for example with regard to the description of the impact that arises when noise is above or below the ABC thresholds referred to in BS 5228, and</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>the assignment of numerical noise levels to the formal Lowest/Significant Observed Adverse Effect Levels.</p> <p>The operational noise methodology as applied is faulty because (a) it has led to an inappropriate choice of background noise level and (b) it unsupportably concludes that no tonal character penalty should be applied. The guidance relating to “context” in reaching conclusions using BS 4142 is misunderstood and therefore misapplied. No methodology has been applied for the purpose of dealing with the special case of several 100Hz pure-tone noise sources.</p> <p><u>Applicants’ Response</u></p> <p>Construction noise: The Applicants do not believe the guidance for the assessment of construction phase noise has been misinterpreted and refer to the Noise and Vibration Clarification Note submitted at Deadline 2 (REP2-011). The Applicants note that this same statement has been agreed with the Councils in respect of construction phase noise (see LA-09.03 of REP1-072).</p> <p>Operational noise: The Applicants do not consider that the operation phase noise assessment methodology is faulty and would refer to section 4 of the Noise and Vibration Clarification Note submitted at Deadline 2 (REP2-011).</p>
SASES-703	Assessment Methodology	The worst case scenario presented in	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The scenario presented is not worst case.</p>



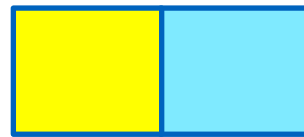
ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
		the assessment is appropriate.				<p>No assessment of uncertainty in either source sound power assumptions, modelling assumptions and accuracy or background noise measurement is reported. It cannot therefore be said that the worst case scenario has been presented.</p> <p>No consideration has been given to circumstances where the substantial benefit of ground and atmospheric attenuation that has been modelled is absent due to meteorological conditions highly favourable to noise propagation from source to receiver. No consideration is given to sound pressure addition rather than sound intensity addition where noise from more than one pure tone source is present.</p> <p><u>Applicants' Response</u></p> <p>The Applicants have prepared a Noise Modelling Clarification Note which has been submitted at Deadline 4, which provides further information on this matter (document reference ExA.AS-8.D4.V1)..</p>
SASES-704	Assessment Conclusions	The ES adequately characterises the baseline environment in terms of noise.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The ES chooses inappropriately high background noise levels for the purposes of assessment.</p> <p><u>Applicants' Response</u></p> <p>The Applicants refer to the <i>Applicants' Response to Appendix 4 of the Local Impact Report</i> submitted to the Examinations at Deadline 3 (document reference ExA.AS-19.D3.V1) for further information</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						regarding the background noise level used to represent the onshore substation study area and how this value was determined.
SASES-705	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The methodologies are not fully agreed. The methodologies used have been misinterpreted and as a result false conclusions have been reached.</p> <p><u>Applicants' Response</u></p> <p>General: The Applicants note that the ETG was consulted on the methodology of the noise impact assessment and the Councils have agreed to the methodology adopted.</p> <p>Construction noise: The Applicants do not believe the guidance for the assessment of construction phase noise has been misinterpreted and refer to the Noise and Vibration Clarification Note submitted to the Examinations at Deadline 2 (REP2-011). The Applicants note that this same statement has been agreed with the Councils in respect of construction phase noise (see LA-09.03 of REP1-072).</p> <p>Operational noise: The Applicants consider that the operational phase noise assessment methodology is appropriate and would refer to section 4 of the Noise and Vibration Clarification Note submitted to the Examinations at Deadline 2 (REP2-011).</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
SASES-706	Assessment Conclusions	The assessment of cumulative impacts is consistent with the agreed methodologies.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The methodologies are not fully agreed. The British and International Standards and noise prediction models used apply to conventional industrial noise and do not provide a method of assessing the cumulative impact of several sources where the noise is concentrated at a single frequency, i.e. 100Hz, has not been addressed.</p> <p>There has not been an assessment which addresses the impact of future projects, namely Nautilus, Eurolink, North Falls, Five Estuaries, SCD1 and SCD2.</p> <p><u>Applicants' Response</u></p> <p>The Applicants note that the ETG was consulted on the methodology of the noise impact assessment and the Councils have agreed to the methodology adopted.</p> <p>The Applicants will respond to SASES' Deadline 2 submission in respect of noise matters at Deadline 4.</p>
SASES-707	Mitigation	The embedded mitigation set out within section 25.3.3 and section 25.3.4 of the ES is appropriate and sufficient.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The predictions underlying the ES assessment rely on very high levels of mitigation, for example in the assumption of providing high performance acoustic enclosures for transformers. The field performance of actual transformer enclosure designs has not been assessed. Consequently, no assessment of residual effects after the</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>application of specifically described mitigation measures has been made. It has simply been assumed that mitigation will in due course be available to achieve the DCO requirements without any technical demonstration that achievement of those requirements will actually result.</p> <p><u>Applicants' Response</u></p> <p>The Applicants will respond to SASES' Deadline 2 submission in respect of noise matters and submit a Noise Modelling Clarification Note at Deadline 4.</p>

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3 Signatures

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

<p>Signed: _____</p> <p>Print Name: _____</p> <p>Job Title: _____</p> <p>Date: _____</p> <p>Duly authorised for and on behalf of Substation Action Save East Suffolk</p>
<p>Signed: _____</p> <p>Print Name: _____</p> <p>Job Title: _____</p> <p>Date: _____</p> <p>Duly authorised for and on behalf of East Anglia TWO Limited</p>
<p>Signed: _____</p> <p>Print Name: _____</p> <p>Job Title: _____</p> <p>Date: _____</p> <p>Duly authorised for and on behalf of East Anglia ONE North Limited</p>