

**SCOTTISHPOWER
RENEWABLES**

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on SASES' Deadline 7 Submissions

Applicant: East Anglia TWO and East Anglia ONE North Limited
Document Reference: ExA.AS-22.D8.V1
SPR Reference: EA1N_EA2-DWF-ENV-REP-IBR-001017

Date: 25th March 2021
Revision: Version 01
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Applicable to East Anglia ONE North and East Anglia TWO



Revision Summary

Rev	Date	Prepared by	Checked by	Approved by
01	25/03/2021	Paolo Pizzolla	Ian MacKay	Rich Morris

Description of Revisions

Rev	Page	Section	Description
01	n/a	n/a	Final for submission at Deadline 8

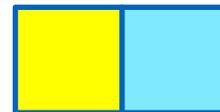


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Glossary of Acronyms

AONB	Area of Outstanding Natural Beauty
COPA	Control of Pollution Act 1974
DCO	Development Consent Order
ES	Environmental Statement
ESC	East Suffolk Council
ExA	Examining Authority
HGV	Heavy Goods Vehicle
LCV	Light Commercial Vehicle
OAMP	Outline Access Management Plan
OCoCP	Outline Code of Construction Practice
OCTMP	Outline Construction Traffic Management Plan
OLEMS	Outline Landscape and Ecological Management Strategy
OODMP	Outline Operational Drainage Management Plan
OTP	Outline Travel Plan
SCC	Suffolk County Council
SASES	Substation Action Save East Suffolk
SoCG	Statement of Common Ground
SuDS	Sustainable Drainage System
SZC	Sizewell C Nuclear Power Station
TN	Target Note



Glossary of Terminology

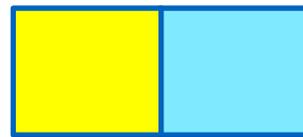
Applicant	East Anglia TWO Limited / East Anglia ONE North Limited
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up 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.
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 ONE North project / East Anglia TWO project Development Consent Order but will be National Grid owned assets.
National Grid overhead line realignment works	Works required to upgrade the existing electricity pylons and overhead lines (including cable sealing end compounds and cable sealing end (with circuit breaker) compound) to transport electricity from the National Grid substation to the national electricity grid.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.
National Grid substation location	The proposed location of the National Grid substation.
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 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 substation	The East Anglia TWO / East Anglia ONE North substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure.
Onshore substation location	The proposed location of the onshore substation for the proposed East Anglia TWO / East Anglia ONE North project.



1 Introduction

1. This document presents the Applicants' comments on Substation Action Save East Suffolk's (SASES) Deadline 7 submissions as follows:
 - ***Applicants' Comments to Responses to Applicants D6 Comments on SASES D5 Submissions*** (REP7-087);
 - ***Applicants' Comments to SASES's Comments on Applicants' Responses to ExQs2*** (REP7-091);
 - ***Applicants' Comments in Response to SASES's Submission in respect of Operation Land (REP6-059 and REP6-110)*** (REP7-088);
 - ***Applicants' Comments in Response to SASES's Comments on Deadline 6 Submissions*** (REP7-089);
 - ***Applicants' Comments in Response to SASES Comments on D6 dDCO Submissions*** (REP7-093); and
 - ***Applicants' Comments in Response to SASES' Submission in Respect of Hedgerows*** (REP7-092).

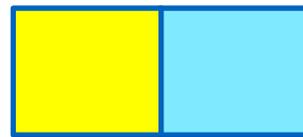
2. This document is applicable to both the East Anglia TWO and East Anglia ONE North DCO applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's (ExA) procedural decisions on document management 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.



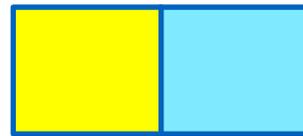
2 Comments on SASES' Deadline 7 Submissions

2.1 Applicants' Comments to Responses to Applicants D6 Comments on SASES D5 Submissions

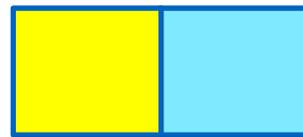
ID	SASES' Comment	Applicants' Comments
Substation Design Principles Statement		
1	<p>2-18</p> <p>Several of the Applicants comments have crossed with clarifications and corrections provided by SASES Deadline D6 submissions, or are repeats of previously made arguments. These are therefore only summarised below for reference:</p> <p>a) The requirement for the Applicants substations to be close to the existing OHLs is not correct, a distance of up to 5km from the target NGET substation is acceptable without the likelihood of reactive compensation equipment being required. Previously raised by SASES in connection with Site Selection and Grid Connection.</p> <p>b) SASES continues to assert that the involvement of independent third party power engineering expertise as part of the design review process could lead to a better and more transparent outcome. The Applicant seems intent on replicating the EA1 electrical design regardless, without considering other potentially better options for what is agreed to be a far more sensitive location.</p> <p>c) According to the ES description the Hornsea One substation does include reactive compensation equipment and is therefore a worthwhile comparator with the Applicant's EA1N and EA2 proposals as well as being a</p>	<p>a) As clearly set out in Chapter 4 – Site Selection and Assessment of Alternatives of the ES (APP-052), economic and efficiency principles were used to define the onshore substation(s) site selection study area. The requirement for an economic and efficient solution is defined in the NPS EN-1, the National Grid's Guidelines on Substation Siting and Design (The Horlock Rules) (National Grid undated) and the Electricity Act 1989 ('EA89', HM Government 1989). Review of these guidance and legislations documents resulted in the following aims:</p> <ul style="list-style-type: none"> Onshore substation(s) to be positioned as close to the existing National Grid overhead lines as possible to reduce the requirement for cabling; and Onshore substation and National Grid substation to be positioned as close as possible to each other to deliver an efficient and economic system (co-location). <p>Considering the above, the onshore substation(s) site selection study area was expanded to a 1km buffer either side of the overhead line route into Sizewell. This was to ensure that any potential options, at a less economic and efficient distance from the overhead line, would still be captured and considered.</p> <p>b) The Applicants consider it to be wholly inappropriate and unfeasible for a power engineering oversight to be undertaken given the engineering and electrical safety standards and procurement processes that are involved in the delivery of nationally significant infrastructure projects.</p>



ID	SASES' Comment	Applicants' Comments
	<p>justifiable basis for NGESO's 2.1ha benchmark footprint for an 800MW HVAC substation.</p>	<p>It is misleading to suggest that it is the intention to simply replicate the EA1 design. A comparative assessment of the Projects' onshore substation design envelopes with that of the already constructed East Anglia ONE project was used to provide a 190m x170m footprint during examination. The final layout will be subject to detailed system studies, substation design and rigorous supply chain engagement, and consultation in compliance with the Substation Design Principles Statement (document reference ExA.AS-30.D8.V1). The need for safe and efficient operation of the onshore substation is essential, noting the incoming cables must enter at the southern boundary of the onshore substations, and exit at the northern boundary to the National Grid substation, thereby defining the general layout of the onshore substations.</p> <p>c) The Applicants have previously justified the need for the onshore substation size. Where feasible, the onshore substation footprint will be reduced further during the detailed design process. The Applicants have no further comment.</p>
<p>Clarification Note Noise Modelling</p>		
2	<p>20 DCO Noise Limits</p> <p>The statement that "Noise attenuation afforded by the walls and windows of a building envelope typically reduces received noise levels from external noise sources indoors by 10-15dB accounting for a partially open window (as per BS8233:2014 and World Health Organisation guidelines (WHO, 1999))" contrasts with the assumption made in the "East Anglia ONE Operation Phase Noise Monitoring Report" 3rd February 2021. That report takes the outside-inside correction as a minimum of 19 dB because it assumes a ventilation opening of only 0.05m². Acknowledgement</p>	<p>We repeat the commentary given within Applicants' Comments on Substation Action Save East Suffolk's (SASES) Deadline 6 Submissions (REP7-059) comments regarding their querying of this particular methodology:</p> <p><i>"The method described and critiqued within this comment ... was discussed within the methodology section of the EA1 Report but it is critical to note that this method was not used within the assessment to define tonality either at the receptors or at the source.</i></p> <p><i>This method was discussed purely in order to provide additional context and relevant information for the Local Authority – it acted as an 'informative' addition to the main assessment relating to potential indoor noise levels.</i></p>



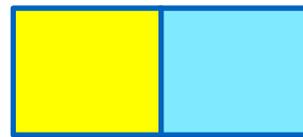
ID	SASES' Comment	Applicants' Comments
	<p>that it is appropriate to assume that the outside-to-inside reduction is much less than 19 dB is welcome.</p> <p>The WHO recommendations about internal noise levels are based primarily on research into the effects of transportation noise sources, which are broad-band and not significantly tonal or of predominantly low frequency. The 1999 WHO Guidelines were partially superseded by the 2018 Environmental Noise Guidelines for the European Region (in the drafting of which Rupert Thornely-Taylor was a member of the External Review Group). The internal noise recommendations in the 1999 Guidelines, which survive, are all traceable to research into the effects of transportation noise, not noise from an electricity substation. The 1999 WHO guidelines say (3.9) "The evidence on low-frequency noise is sufficiently strong to warrant immediate concern. Various industrial sources emit continuous low-frequency noise (compressors, pumps, diesel engines, fans, public works); and large aircraft, heavy-duty vehicles and railway traffic produce intermittent low-frequency noise. Low-frequency noise may also produce vibrations and rattles as secondary effects. Health effects due to low-frequency components in noise are estimated to be more severe than for community noises in general (Berglund et al. 1996). Since A-weighting underestimates the sound pressure level of noise with low-frequency components, a better assessment of health effects would be to use C-weighting.". Low frequency noise is defined in the Defra-funded Salford University Report "A procedure for the assessment of low frequency noise complaints" as noise in the range 20-160Hz, and that report recommends an unweighted criterion value of 38 dB indoors at 100Hz, equivalent to 18.9 dBA after applying the 19.1 dB A-weighting at 100Hz if the noise is predominantly contained in the 100Hz 1/3 octave band. To achieve this for the range of window</p>	<p><i>The DCO Requirement 24 for EA1 required that external noise levels be assessed, in accordance with BS4142, and the assessment described within the EA1 Report does exactly this".</i></p>



ID	SASES' Comment	Applicants' Comments
	conditions the applicant now considers gives an outdoor criterion of 28.9 dBA.	
3	<p>21 – Update Noise Modelling</p> <p>It is not necessary to model “every single permutation of noise associated with variable meteorological conditions”. It is simply necessary to model the conditions most favourable for noise propagation from source to receiver. It is correct to say “that ISO 9613-2 provides a calculation method for predicting sound levels under meteorological conditions most favourable for the propagation of sound, namely mild downwind or temperature inversions.” By inspection of the predictions which the applicant has provided it appears that the method for predicting sound levels under meteorological conditions most favourable for the propagation of sound has not been used.</p>	<p>The modelling was undertaken using SoundPLAN (version 8.2) which adheres to ISO 9613-2 in its calculation methodology for the prediction of noise levels. The appropriate meteorological conditions (i.e. those most favourable for sound propagation) have therefore been considered within both the original modelling results presented within Chapter 25 of the Environmental Statement (ES) (APP-073) and the updated noise modelling results presented within the Noise Modelling Clarification Note (REP4-043).</p>
4	<p>22 – Date Sources and Characteristics</p> <p>The statement that “The Applicants reiterate that once 1/3 Octave spectral data becomes available an assessment of tonality will be undertaken” is at odds with the statement in ID 20 that “With regard to EN-1, the Applicants note that this also requires projects to be ‘deliverable’ which the Applicants have sought to achieve through significant early engagement with the supply chain to establish a solution that minimises environmental impact whilst ensuring the deliverability of the Projects.” As they do not have spectral data and do not know whether a 6 dB tonal penalty will apply, they have self-evidently not established a solution that minimises environmental impact. It is true to say that the applicants must ensure that the operation of the onshore substations does not exceed the maximum operational noise rating limits, but if powers are granted it is</p>	<p>The Applicants note that use of a Rochdale envelope to consent a project allows flexibility within the detailed design process, which is undertaken post-consent. The final detailed design must comply with the consented authorised development and by default have regard to the requirements of the DCO.</p> <p>During Issue Specific Hearing 12, East Suffolk Council (ESC) advised that a pre-commencement condition would address its concern regarding the matter of tonality. The Applicants have secured a commitment at Deadline 8 within the Substations Design Principles Statement (document reference ExA.AS-30.D8.V1) for a pre-commencement condition which requires an Operational Noise Design Report to be submitted to the relevant planning authority with information on:</p> <ul style="list-style-type: none"> • Layout of the onshore substations and National Grid substation;



ID	SASES' Comment	Applicants' Comments
	<p>necessary to establish that reliable engineering means exist for achieving the necessary noise attenuation. Powers should not be granted on the basis of noise limits unless they have been shown to be achievable.</p>	<ul style="list-style-type: none"> • Equipment specifications (with regard to sound power levels); • Details of any physical attenuation measures such as acoustic screens or bunds; • Noise prediction methods and the results obtained from the modelling including consideration of uncertainty in the predictions; • Provision of 1/3 octave spectrum information at the noise sensitive locations specified within Requirement 27 of the DCO; and • Where available, provide supplier information / measurement data to inform consideration of the audibility of tones using the reference method set out in Section 9.3.3 and Annex D of BS4142:2014+A1:2019. <p>The Applicants will meet with the Councils as required to discuss the findings of the Operational Noise Design Report and will address reasonable queries arising from such engagement.</p>
5	<p>23 – National Grid Infrastructure</p> <p>Because the definition of noise rating level in BS 4142 requires the removal of the contribution of residual sound it needs to be made clear whether, in the required monitoring process for EA1N and EA2, noise from the National Grid Infrastructure will be treated as residual noise and removed from the calculation of specific sound level.</p>	<p>At Deadline 8 the Applicants have committed to preparation of an Operational Noise Design Report prior to commencement of construction of the relevant works. Specific details of operational noise monitoring will be set out within the Operational Noise Monitoring Scheme as required under requirement 27.</p> <p>It is anticipated that the sound from the National Grid substation installed as part of the Projects would not be categorised as residual and would therefore be included within the calculation of the specific sound level.</p>
6	<p>24 – Revised Operation Noise Assessment</p> <p>If the applicant's use of background noise measurements is to survive scrutiny, the reason for rejecting the results for SSR9 must be logical and appropriate. The applicant's response firstly tends to suggest that the background noise measurements relied on are</p>	<p>The Applicants refer to their position on the omission of the as-measured background sound levels at SSR9 set out within their Position Statement on Noise (document reference ExA.AS-14.D8.V1).</p>



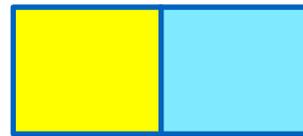
ID	SASES' Comment	Applicants' Comments
	<p>affected by the presence of facades, which would be incorrect according to BS 4142 which requires measurements to be taken so as to minimise the influence of reflections. The distance between the SSR9 measurement position and a façade cannot be an explanation for low levels unless there is a noise source near the façade, which for residential buildings is unlikely to be the case. Secondly, distance from the locations of proposed noise sources has no relevance as those locations are currently open fields that do not normally emit noise. The distance to local sources such as roads is not relevant as the roads in the area are not so highly trafficked as to affect the LA90 materially – the passage of vehicles would only affect LA10 and LAeq. There is currently no reasonable explanation for rejecting the background noise measurements at SSR9.</p>	
7	<p>25, 26 See response to ID 24</p>	<p>Please refer to the Applicants' comments at ID6.</p>
8	<p>27 See response to ID 22</p>	<p>Please refer to the Applicants' comments at ID4.</p>
9	<p>28 Not omitting the under-range results is not a precautionary approach. The precautionary approach would be to take steps to discover what the true background noise is after removing the influence of instrument self noise which invalidates the results and causes them to be under-range. SASES have considered absolute sound levels in their Deadline 5 response, and also in the response to ID20 above.</p>	<p>The Applicants note that there is no guidance or industry accepted methodology for correcting as-measured noise levels near to or below the noise floor of the measurement instrument to ascertain the 'true' sound level. It is considered that including the data near to or below the measurement noise floor within the analysis of background sound levels represents a more precautionary approach than applying an under-tested calculation on such data to arrive at the 'true' sound level.</p>



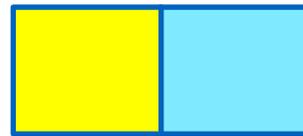
ID	SASES' Comment	Applicants' Comments
10	29 See response to ID22 and ID24.	The Applicants' comments at ID4 and ID6.
Clarification Note SuDS Infiltration Note and Outline Operational Drainage Management Plan		
11	30 – 33 See comments on the Outline Operational Management Plan submitted by the Applicants at Deadline 6. These are set out at Appendix 1 to Comments On Applicants Deadline 6 Submissions Submitted At Deadline 7 . These matters will be further discussed at ISH11- Flood Risk and Drainage	Noted, please see Table 2.4 .
Applicants' Comments on SASES Deadline 3 Submissions		
12	46 -54 Application and relevant of Schedule 9 Electricity Act 1989 The Applicants' comments are noted and SASES will respond at Deadline 8.	Noted.
13	68 – Landscape and Visual – Landscape Briefing Note As noted with regard to the Applicants' answer to ExA question 2.10.11 the uncertainty over the scheduling of the individual substations means that uncertainty remains over the length of the construction period and consequently the date at which the vast majority of the mitigation planting within the OLEMS would be undertaken.	The final landscaping scheme for the first project to be developed will be subject to approval under the Landscape Management Plan, The Applicants consider that a vast majority of the planting proposed within the Outline Landscape and Ecological Management Strategy (OLEMS) (document updated at Deadline 8, document reference 8.7) will be delivered under the first project to be constructed (if constructed sequentially).
14	69 – Landscape and Visual – Landscape Briefing Note	Requirement 43 of the draft DCO (document updated at Deadline 8, document reference 3.1) prevents the grid connection works from commencing unless the



ID	SASES' Comment	Applicants' Comments
	<p>The Applicants accept that it is an expectation and not a commitment that the National Grid substation, cable sealing ends etc will be constructed in parallel with one or both of the onshore substation(s). There has been no assessment of the implications of it being constructed in advance of the onshore substation(s).</p>	<p>offshore works have commenced or appropriate evidence has been presented to the to the Secretary of State demonstrating the Applicants commitment to commence the authorised development. Construction of the National Grid infrastructure is therefore within the scope assessed within the ES.</p>
15	<p>70 - Landscape and Visual – Landscape Briefing Note</p> <p>The Applicants' lack of a commitment to avoid a delay between construction of the onshore substations means that the uncertainty over the length of the construction period remains.</p> <p>It is unclear what the is being referred to when the Applicants note that 'strategic landscape planting will be delivered during construction of the first project.' I assume this refer to what is described elsewhere as the 'early planting', as the vast majority of the mitigation planting cannot be implemented until all construction works have been completed. Consequently, the first substation and the NG substation could be in place for more than three years before the main mitigation planting was even planted.</p>	<p>The final landscaping scheme for the first project to be developed will be subject to approval under the Landscape Management Plan. The Applicants consider that a vast majority of the planting proposed within the OLEMS (document updated at Deadline 8, document reference 8.7) will be delivered under the first project to be constructed (if constructed sequentially).</p>
16	<p>71 - Landscape and Visual – Landscape Briefing Note</p> <p>The Applicants confirm that the uncertainty over both the length of the construction period and the date on which the vast majority of the mitigation planting can be implemented remains.</p>	<p>See ID15 above.</p>
<p>Further Comments on Applicants Outline Watercourse Crossing Method Statement</p>		
17	<p>76 – Alternative “trenchless” options</p> <p>Applicant has replied: “When accounting for the additional lateral distance required to reach sufficient depths to drill beneath the bed</p>	<p>The Applicants have provided further commentary regarding the unsuitability of a micro-tunnelling construction technique for the crossing of features within the vicinity of the B1122 Aldeburgh Road at Appendix 2 of the updated Outline Watercourse Crossing Method Statement submitted at Deadline 6 (REP6-</p>

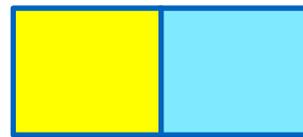


ID	SASES' Comment	Applicants' Comments
	<p>of the Hundred River, beneath the B1122 Aldeburgh Road and underneath the woodland west of Aldeburgh Road, the Applicants calculate a drill length of at least 500m.</p> <p>From SASES's understanding of the differences between HDD and microtunnelling, it would appear the Applicant is referring to HDD not Microtunnelling techniques?</p> <p>Please refer also to SASES Deadline 7 responses to</p> <ul style="list-style-type: none"> Applicants' Oral Case on ISH7 Biodiversity & Habitats and SASES Deadline 7 Comments on Outline Watercourse crossing methodology v02 	<p>041). Further reasons for the unsuitability for micro-tunnelling at this location include:</p> <ul style="list-style-type: none"> The delivery of the plant, machinery and piping required for this operation as well as the handling and disposal of the material used and removed from the tunnelling operation would involve considerably higher levels of traffic than for an open trench solution; It would require the construction and installation of two deep / large caissons / pits (at entry/exit points) for the machine drilling head to be installed / removed; and It would require the set-up of a large compound at the entry point to cover all aspects of the works including but not limited to set-up of control rooms / offices, laydown area, water, soil and waste management plant areas, among others. <p>The construction programme (including reinstatement of the affected areas) for this technique will extend significantly from that of the open trench crossing technique.</p>
Comments on Post Hearing Submissions (ISH6)		
18	<p>78 – 103 dDCO</p> <p>SASES note the comments by the Applicants. The draft DCO has become something of a moving target given ISH9 and the related post hearing submissions by various parties. Further a new draft DCO is awaited at Deadline 7. Accordingly SASES will await the revised draft DCO and any comments by the Applicants on its Post ISH9 submission before making further submissions in respect of the draft DCO.</p>	Noted.

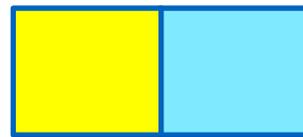


2.2 Applicants' Comments to SASES' Comments on Applicants' Responses to ExQs2

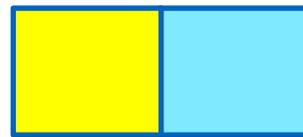
ID	SASES' Comment	Applicants' Comments
2.0 Overarching, general and cross-topic questions		
1	<p>2.0.1 Permitted development rights</p> <p>See separate Submission in respect of Operational Land submitted at Deadline 7</p>	Noted, please Table 2.3 .
2	<p>2.0.7 – 2.0.12 Substation Design Principles Statement [REP4-029] & Design Evolution</p> <p>a) SASES reiterates its concern that the Applicants have entered the Examination process appearing to have undertaken only very basic design work on the substations themselves. This comment is made taking as a comparison the ES material for other wind farm projects such as Triton Knoll, Rampion, Hornsea One etc. where detailed plans and elevations and/or 3D visualisations have been provided including details of materials and finishes. The Applicants proposal to provide further and possibly still incomplete information as late as Deadline 8 is not, in SASES view, acceptable.</p> <p>b) The Applicants' statement under 'Onshore Substation' taken from [APP-052] Section 4.4.2 that "Gas Insulated Switchgear (GIS) transformer technology ~ allows for a lower building height" is fundamentally wrong. GIS technology normally requires a greater building height but offers a lower ground footprint. There is, of course, the further issue that it requires use of SF6 which is an extremely potent greenhouse gas, which NGET are committed to phasing out, as they explained at CAH2</p>	<p>a) A key factor in the UK's success in delivering offshore wind is the flexibility offered by the Rochdale Envelope approach in the consent process. This is recognised by NPS EN-1 (paragraph 4.2.8) as providing the necessary flexibility for further evolution and refinement of project design within the assessed maximum extents. This allows developers to utilise the most up to date technologies, principles and guidance as part of the final project design and at the construction stage.</p> <p>The Applicants have continued to undertake site refinements which have resulted in improvements to the onshore substations design.</p> <p>The approach adopted by the Applicants is wholly in accordance with NPS EN-1, and the setting of maximum parameters within the draft DCO (document updated at Deadline 8, document reference 3.1) ensures the validity of the assessments undertaken.</p> <p>The Applicants note the comprehensive outline landscape measures presented within the OLEMS (document updated at Deadline 8, document reference 8.7) and the design and consultation measures presented within the Substation Design Principles Statement (ExA.AS-30.D8.V1).</p>



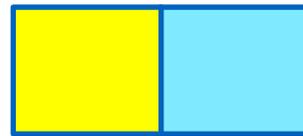
ID	SASES' Comment	Applicants' Comments
		b) At the time of establishing the size of the GIS building height for the onshore substation a GIS solution was adopted which allows for a more compact and therefore can be located within a smaller building.
2.8 Historic Environment		
3	<p>2.8.2 High House Farm</p> <p>We welcome the observations made by the ExA in their Question 2.8.2 that viewpoints CHVP3 and VP5 do not represent the view southwards from within the curtilage of High House Farm and that long views are to be appreciated across the open farmland towards the church. Of course, this view is reversed from the church.</p> <p>In their response, the Applicants acknowledge that the curtilage of High House Farm is understood to be cluster of former agricultural buildings, which includes Moor Farm and Friston Barn and their gardens. This represents a much larger and more significant reading of the heritage asset than has previously been acknowledged, with previous assessments focussing on individual buildings rather than the former farm complex as a whole.</p> <p>The submitted visualisations, such as they are, do not support the Applicants' assertion that the construction of the substations and sealing end compounds, the latter being situated between 230m and 275m away, will not sever the connection between High House Farm and the church. We have consistently stated that it will, and this conclusion has been reached by other parties with heritage interests.</p>	The Applicants have no further comments on this matter and would like to refer back to the <i>Heritage Assessment Addendum</i> (REP4-006) <i>Landscape and Visual Impact Assessment Addendum</i> (REP4-031).



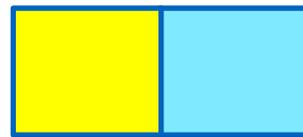
ID	SASES' Comment	Applicants' Comments
	<p>Furthermore, the Applicants' acceptance of the fact that the proposed mitigation planting adjacent to High House Farm will indeed sever the views of the church is a clear indication that the mitigation scheme in itself will also have a detrimental impact upon heritage assets, in addition to the substations and infrastructure themselves. Again, this has been consistently identified by us and other parties as a material concern, in that the proposed mitigation scheme is at best ineffective and at worst harmful.</p> <p>As has been rehearsed in writing and orally, we do not accept the Applicants' position that the views and long-range connection between High House Farm and the church do not add to the significance of either of these heritage assets. On the contrary, the survival of the survival of the complex interrelationship between the heritage assets to the north of Friston is a strong element of the historic landscape character of the proposed development area.</p> <p>The significant change in landscape character proposed to the south of the High House Farm will have a detrimental impact, the scale of which we consider the Applicants has underestimated in their own assessment.</p>	
4	<p>3.8.3 Friston House</p> <p>We welcome the indication from the ExA's question that the curtilage and boundary of Friston House lie to the east of the woodland within the grounds and that there are areas of open ground to the north of the house which afford direct views of the proposed development sites. We have consistently highlighted the shortcomings of the submitted visualisations pertaining to Friston</p>	<p>The Applicants have no further comments on this matter and would like to refer back to the <i>Heritage Assessment Addendum</i> (REP4-006) <i>Landscape and Visual Impact Assessment Addendum</i> (REP4-031).</p>



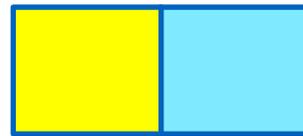
ID	SASES' Comment	Applicants' Comments
	<p>House, together with the assertion that the grounds are secluded, private and disconnected from the surrounding landscape.</p> <p>We welcome the fact that the Applicants now acknowledge that the open ground to the north forms part of the setting of Friston House and that this has the potential to be impacted upon by the proposed development area. However, we disagree with the Applicants' conclusion that this ground does not contribute towards the significance of the house itself. We would argue that, as an element of the wider designed landscape which has grown up around the house, it does make a contribution to the significance of the heritage asset.</p> <p>Again, we welcome the Applicants' acknowledgement that there would be change in the setting to the north of Friston House, a position which has not previously been recognised or articulated, and one which is at odds with the approach taken to the assessment of the heritage asset in the submitted heritage impact assessments. We would, however, contest the conclusion that the changes to the setting would not result in a negative impact on the setting Friston House.</p>	
5	<p>2.8.4 Woodside Farm</p> <p>Again, we welcome the ExA's observation that the submitted viewpoint CHVP5 does not illustrate the effect of the proposed development and the proposed mitigation planting on the setting of the farm, as viewed from the rear of this heritage asset. We have consistently stated that the selection of a viewpoint to the west of the building gives an unrepresentative impression of the impact of the development. As the Applicants states, the selection of this view 'the building partially screens both the proposed substations and</p>	<p>The Applicants have no further comments on this matter and would like to refer back to the Heritage Assessment Addendum (REP4-006) Landscape and Visual Impact Assessment Addendum (REP4-031).</p>



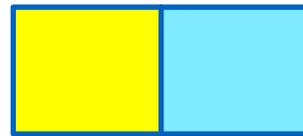
ID	SASES' Comment	Applicants' Comments
	<p>mitigation planting from view.' We acknowledge the Applicants' offer to produce additional photomontages from this location, which, as they state will give 'an uninterrupted view towards the substations' and look forward to viewing the results.</p> <p>We have consistently stated that the change of character of the setting of the heritage asset, together with the strong visual impact, which will be brought about by the proposed development will have a higher degree adverse impact upon the heritage asset than the Applicants concludes. We remain unconvinced that the proposed landscape mitigation will have any effect here.</p>	
6	<p>2.8.5 Little Moor Farm</p> <p>We welcome the ExA's observations that the submitted CHVP4 shows that large sections of the proposed National Grid substation will still be visible from this heritage asset, even after 15 years' growth of the mitigation planting, and we would re-state our view that the adverse impact of proposed development will not be mitigated by the proposed planting. This is primarily because the heritage harm caused by the proposal pertains to the significant change in landscape character brought about by the proposals and the severance of the historic connections between the northern group of heritage assets and the church to the south, the latter being exacerbated by the introduction of additional screening by way of mitigation. As has been expressed in writing and orally, we disagree with the Applicants' assessment that the church will be impacted upon by this loss of visual connection, but that Little Moor Farm will not.</p>	<p>The Applicants have no further comments on this matter and would like to refer back to the <i>Heritage Assessment Addendum</i> (REP4-006) <i>Landscape and Visual Impact Assessment Addendum</i> (REP4-031).</p>



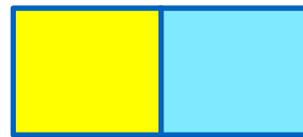
ID	SASES' Comment	Applicants' Comments
7	<p>2.8.6 Church of St Mary</p> <p>We welcome the ExA's recognition of the current tranquillity of the church and churchyard, and are pleased that the visual and spatial relationship between the exterior and interior of the church and the proposed development sites have been appreciated. We continue to contest the Applicants' statement that the proposed development will have no effect upon the tranquillity of the site, and dispute their assessment of the visual and aural intrusion of the proposed development. In their written responses, the Applicants acknowledge that the elements of the substations will be 'more or less visible in views north from the churchyard', which appears to be a weakening of previous statements on the subject.</p> <p>Similarly, we and other bodies with heritage expertise, including Historic England, East Suffolk Council and the Suffolk Preservation Society, continue to identify the significant change of landscape character to the north of the church and the severance of the historical relationship between the church and the farmsteads to the north will have a significant detrimental effect upon the significance of the church.</p> <p>We would agree with the Applicants that selected viewpoints only give a partial impression of the likely effects of the development, although we have set out previously our arguments as to how more representative viewpoints might have been selected, and would agree that a site visit enables a better understanding. We are sure that the ExA will have formed its own opinion on these matters during its visits.</p> <p>This is also the first time which the Applicants has set out in more detail the nature and proximity of the construction works which are</p>	<p>The Applicants have no further comments on this matter and would like to refer back to the <i>Heritage Assessment Addendum</i> (REP4-006) <i>Landscape and Visual Impact Assessment Addendum</i> (REP4-031).</p>



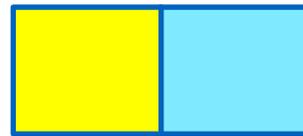
ID	SASES' Comment	Applicants' Comments
	<p>proposed for the immediate environs of the church, which would also have an impact upon the setting of the heritage asset. As we have set out previously, we consider the lack of a detailed assessment of the impacts of the prolonged construction phase on all of the affected heritage assets to be a significant omission on the part of the Applicants.</p>	
<p>2.17 Socio-economic effects</p>		
<p>8</p>	<p>2.17.1 Socio-economic benefits</p> <p><u>Geography</u></p> <p>This response demonstrates the confusion which the Applicants have created by using incorrect or multiple definitions of local, regional and UK.</p> <p>The definition of “local” is not local, it includes for example Great Yarmouth which is 40 miles by road from the substation site and over an hour away by car.</p> <p>Three definitions of regional are used.</p> <p>Two definitions of UK are used.</p> <p><u>Contracts</u></p> <p>The Applicants have referred to the number of organisations and purchase orders with no indication of the size of organisation or value of purchase orders or the extent to which the work is actually conducted locally/regionally. Further it refers to these being “awarded across the East Coast” but is unclear as to the definition unless it means the east coast of the UK which is referred to in the</p>	<p>Geography:</p> <p>The Environmental Statements define local, regional, and national study areas. They follow a methodology agreed with stakeholders, including the local authorities, and are applied consistently.</p> <p>A resident of, for instance, Felixstowe may not feel that Lowestoft is ‘local’ to them and yet, by an agreed definition, they share the same ‘local’ authority (i.e. East Suffolk Council). That same resident of Felixstowe may not feel “local” to Newmarket but, by an agreed definition, they are in the same ‘local’ authority, (i.e. Suffolk County Council). Neither definition involves any mileage calculation, just an agreed definition consistently applied.</p> <p>Contracts:</p> <p>The information relating to Purchase Orders / overall value is built up of vendors which have been identified based on the following postcode data set :- CB, CM, CO, IP & NR</p> <p>The Applicants would not be able to provide the financial data – without written permission from all suppliers, and are not in a position to share this data.</p>



ID	SASES' Comment	Applicants' Comments
	<p>last paragraph of under the heading of Geography when it states this is “a useful national and international reference”</p> <p>It is very difficult to assess local and regional benefits when such confusion has been created together with a lack of hard financial data. Such data can be aggregated so there is no risk of commercial confidential information being disclosed.</p> <p><u>Deprivation Geography</u></p> <p>It is well understood that there is substantial deprivation in Lowestoft. This is why SASES has focused on the extremely limited benefits - see below - which the Scottish Power windfarm projects are providing to the people of Lowestoft and the lack of ambition which is being shown in addressing this deprivation, particularly relative to overall project investment.</p> <p><u>Levelling Up</u></p> <p>Scottish Power in respect of Lowestoft refers to two numbers, £25m invested in the outer harbour and the creation of 100 jobs. Whilst any investment and job creation are welcomed the £25 million investment needs to be spread over a number of projects and over a number of years. If it is spread over the four Scottish power projects (EA1, EA3, EA1N and EA2) each of which is believed to have a budget of around £2.5 billion this represents a mere ¼ of 1% even before spreading this investment over the life of the projects.</p> <p>In terms of the 100 jobs how many of those jobs have been filled by people resident in Lowestoft's outer harbour ward? Where do those jobs fit in the pay scale of the people working at the O&M base?</p> <p><u>Conclusion</u></p>	<p>Leaders in Lowestoft provide powerful advocacy for the significant economic benefits to the town:</p> <p><i>“The opening of the East Anglia ONE operations and maintenance base is a big moment for Lowestoft and the wider Waveney area. It demonstrates a significant investment in our town. East Anglia ONE is providing important job opportunities for people locally and across the region, both offshore and onshore, as well as through the local supply chain. “Lowestoft has a proud maritime heritage and the substantial growth of the offshore wind industry, particularly off the coast of East Anglia, will see more generations making a career out at sea. It is great to see Lowestoft leading the way in the UK’s offshore wind revolution”. Peter Aldous MP. 23 October 2019.</i></p> <p><i>“Lowestoft, the UK’s most easterly town, is at the centre of the world’s largest market for offshore wind energy. Lowestoft Port supports billions of pounds worth of offshore projects plus international trade”. Steve Gallant, Leader, East Suffolk Council. 14 July 2020.</i></p> <p><i>“We are extremely pleased and excited to be opening our new energy skills centre, which alongside our offshore wind skills centre demonstrates our commitment to providing this much needed provision which would not be possible with the support and finance provided from of our key partners”. Stuart Rimmer, CE, East Coast College. 30 October 2019.</i></p> <p>Levelling Up:</p> <p>The £25m O&M base is physically located in the deprived outer harbour ward, that is where the existing jobs have been created it will also allow for indirect spend directly in the area. As well as these immediate benefits, SPR's support of East Suffolk College is a long-term investment in skills development that will maximise the opportunity of students in Lowestoft to apply for the future O&M jobs created.</p>



ID	SASES' Comment	Applicants' Comments
	Fundamentally these economic benefits are very small and do not come without the risk of substantial damage to the local visitor economy of the heritage coastal area.	
9	<p>2.17.2 Local demographics</p> <p>This response demonstrates the Applicants have not begun to engage seriously with this risk to the local economy. SASES refers to its comments on the possible duration of the construction period plus the current application period and the future pre construction period all of which have acted and will continue to act as a serious deterrent effect on people seeking to move to the local area and a strong incentive for people (who can afford to) to leave.</p>	<p>The Applicants have no further comments other than to highlight that within the Statement of Common Ground (SoCG) submitted at Deadline 7 with Suffolk County Council (SCC) and ESC all matters relating to socio-economics (including demographics) are agreed (see Table 33 of REP7-056). In terms of Tourism all baseline matters (including demographics) are agreed (see Table 29 of REP7-056), the outstanding point being the disagreement over a project specific visitor survey.</p>
10	<p>2.17.3 Construction</p> <p>a) The Applicants refer to the years of 2028 (as the peak) and 2026 for completion for both projects. Given each DCO has a period of five years from consent and given the estimated construction periods which may or may not be sequential, to state that onshore construction for both projects is planned to be completed by 2026 stretches credibility.</p> <p>b) As was evident at ISH5 the Applicants have not carried out any assessment of the impact on the local tourism economy</p>	<p>a) For clarity, 2028 is the assumed peak (using Sizewell C (SZC) Co.s documentation) for SZC, not for the Projects. The 5 year consent point is noted; however, the Applicants highlight that East Anglia TWO has a connection agreement for November 2024 and East Anglia ONE North has a connection agreement for April 2027 (however, this connection date is currently being modified to April 2025).</p> <p>b) The original question is directed towards accommodation. The Applicants highlight that within the latest Statement of Common Ground with SCC and ESC, the councils are in agreement with the Applicants on cumulative accommodation matters (see Table 29, row LA14.10, REP7-056):</p> <p><i>“The Applicants have submitted a Socio Economics and Tourism Clarification Note comparing the assumptions used for Sizewell C contained within the Projects’ Applications, with the now published Sizewell C material at Deadline 1 (REP1-036). The Councils are content with the conclusions of the clarification note with respect to accommodation”.</i></p>



ID	SASES' Comment	Applicants' Comments
11	<p>2.17.6</p> <p>b) As indicated elsewhere in these comments the construction period (Including onshore preparation work such as site clearance) could last for a period of 10 years. In substance this is not "temporary".</p> <p>The Applicants assert there is "no pathway for a visitor to, for example, Southwold or Dunwich to be affected by these impacts". The Applicants cite no evidence for this assertion. Furthermore there is no reference to Thorpeness, Aldeburgh, Snape Maltings, the surrounding villages, Orford, the use of the footpath or cycle route network or any recognition that visitors travel both through and around the AONB by car, bicycle or on foot to enjoy the amenity and facilities which it currently offers both within and outside the AONB. There is no recognition that visitors who come to enjoy the area do not restrict themselves to the area within the boundary of the AONB and many will stay in locations which are technically outside of the AONB.</p> <p>As is evidenced SASES' submissions on traffic and transport there is a great deal of concern about increased congestion, increased pollution, road safety, rat running on rural lanes. All of this will impact tranquillity to visitors as they travel around the area.</p> <p>In terms of the offshore elements it should be remembered that many if not most residents recognise and support the need for and benefits of offshore wind, despite the impact on seascapes. That is why so few representations have been received on that impact relative to the onshore environmental damage.</p>	<p>b) The Applicants cite no evidence for this assertion.</p> <p>There is no pathway for direct impacts which occur within the onshore development area to affect Southwold or Dunwich, however clearly anyone staying there and visiting the onshore development area could be affected. The point is that there are no direct impacts outwith the onshore development area. The Area of Outstanding Natural Beauty (AONB) stretches from Kessingland to the area around Harwich, the area of direct impact upon the AONB is contained and not extensive throughout the AONB.</p> <p>Within the onshore development area, roads would be kept open and public rights of way would be kept open or alternatives routes provided, details of management measures are included in the Outline Public Rights of Way Strategy (REP3-024).</p> <p>Traffic is covered in detail elsewhere, however the Applicants note that increased pollution is covered under Air Quality and that a vast majority of matters have been agreed with ESC (document updated at Deadline 8, document reference ExA.SoCG-2.D8.V4).</p> <p>The Applicants note and welcome the comment upon seascapes.</p>
12	<p>2.17.9 SEAS Representations</p>	<p>The Applicants have no further comment.</p>

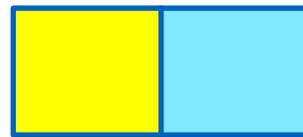


ID	SASES' Comment	Applicants' Comments
	<p>The last paragraph of the Applicants' response indicates yet again the Applicants' mistaken view that somehow the onshore elements of EA1 including the substation site and the landfall are comparable to the Friston site. See SASES Post Hearing Submission (ISH5) submitted at Deadline 5.</p>	
<p>2.18 Transportation and Traffic</p>		
<p>13</p>	<p>2.18.14</p> <p>a) A possible reason for the Applicants wishing to avoid using the Yoxford route is because of Sizewell C traffic.</p> <p>b) As per previous submissions a signal scheme at Friday Street poses a risk of congestion and moving road safety issues elsewhere particularly onto the rural lane network between the A12 and Snape and the Snape crossroads. No doubt this is why the local highways authority have not brought forward such a scheme in the past.</p> <p>The Applicants points out that sending all HGV to the site via the Yoxford-Theberton section of the B1122 would result in extra traffic through those villages, but the argument that this would result in increased traffic through Leiston, Knodishall and Coldfair Green is flawed, as these can be by-passed by the haul road if the route along Lovers Lane is taken to the North of Leiston.</p>	<p>Please refer to the Applicants' response to ExA WQ 2.18.2 (a and d) (REP6-065) which establishes the Friday Street Traffic Signal Junction would have adequate reserve capacity and therefore is unlikely to induce vehicle re-assignment.</p> <p>The Applicants refer to SCC's Deadline 7 comment (REP7-076):</p> <p><i>"The LHA would concur with the Applicant that routing traffic via the B1122 and B1069 via Leiston would impact more residential areas than the A1094 route. While the proposed Sizewell Link Road may reduce the impacts on Yoxford, Middleton and Theberton the route would still pass through Leiston and Knodishall".</i></p> <p>The haul road is not continuous and is locked at the Hundred River, therefore heavy good vehicle (HGV) traffic cannot traverse from Sizewell Gap to Friston without utilising the public highway.</p>
<p>14</p>	<p>2.18.15</p> <p>SASES notes that the Applicants is proposing a signal controlled crossing on the B1353 (crossing 3/4) but not at Grove Road, crossing 11/12). Why is this?</p>	<p>Please refer to the Outline Access Management Plan (OAMP) submitted at Deadline 8 (document reference 8.10), clarifies that speed is the determining factor.</p>

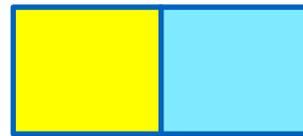


2.3 Applicants' Comments in Response to SASES's Submission in respect of Operation Land [REP6-059 and REP6-110]

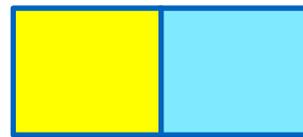
ID	SASES' Comment	Applicants' Comments
Submission in respect of Operational Land		
1	<p>The responses from the Applicants and NGET fail to grapple with the point that any land acquired pursuant to the DCOs risks being regarded as operational land ("OL") for the purposes of PD rights. The definition of OL in s 263(1) Town and Country Planning Act 1990 includes two types of land:</p> <ul style="list-style-type: none"> a) land which is used for the purpose of carrying on their undertaking; and b) land in which an interest is held for that purpose. 	<p>The provisions have to be read with subsection (2) which acts as an exclusion and also section 264(3) which provides for the need for specific permission for the development of the land.</p>
2	<p>The Encyclopedia of Planning Law and Practice recognises (Vol 2, P263.04) that the definition of OL would include "land which the undertaker now owns for future operational use" (because that is land "in which an interest is held" for the purpose of the carrying on their undertaking). Accordingly OL is not necessarily limited to land which is "within the finished compounds" (Applicants) or "within the CSECs and substation compound fence lines" (NGET). It is capable of extending to land which is acquired by the "undertakers" (whether the Applicants, or NGET, or a person taking the benefit of the DCOs), but not within the substation compounds in the final design, so long as the land is still held for the (future) purpose of carrying on their undertaking. In any event, the "finished compounds" or "compound fence lines" may extend well beyond the area actually required to accommodate the infrastructure concerned (the extent of the compounds being a matter for the undertaker to determine).</p>	<p>Section 263 (2) of the draft DCO (document updated at Deadline 8, document reference 3.1) applies the nature and situation test irrespective of whether the land is used or held. The extent and nature of the permanent fencing associated with Work Nos. 30, 38 and 41 is secured through Article 17. Furthermore, the provisions regarding 'operational land' need to be considered in light of all the relevant statutory provisions. In that regard the land must also pass the test set out in section 264(3) and there must be a specific planning permission for the 'development' of the land in question.</p>



ID	SASES' Comment	Applicants' Comments
3	<p>As SASES has explained, this is particular concern because the land capable of being acquired under the dDCOs may be far greater than that which might ultimately be required for the authorised development. It follows that land could be acquired pursuant to the DCOs and continue to be held “for the purpose of carrying on their undertaking” even though it fell outside the land requirements for the substations, CSECs etc. upon detailed design. This land may still be regarded as OL, and thus attract permitted development rights.</p>	<p>Please see ID2.</p>
4	<p>The effect of Article 33 in the dDCOs is to mean that the land which has the benefit of development consent – which is the whole of the land to be permanently acquired under the dDCOs – is all to be treated as benefiting from a specific planning permission for the purposes of s 264(3). This means that all of that land is and will remain OL unless it is neither used for the undertaker's purpose, nor still held by it for its purpose. Thus, for example:</p> <ul style="list-style-type: none"> a) NGET could acquire (whether by taking the benefit of the DCOs, or by being transferred the land following acquisition by another) all of the land within the Order Limits that it considers is might be necessary for delivering its substation and CSECs; b) It could then promote detailed designs which only use 50% of that land for the authorised development, and build out the authorised development accordingly; c) It could continue to hold the balance of the land with a view to future projects and would thereby hold that land for the purpose of its undertaking. In light of the deeming provision 	<p>Article 33 is a standard provision that is based on Model Provision 36 and can be found in the vast majority of DCOs including the East Anglia ONE and East Anglia THREE Orders, the recent Hornsea Three Order and in the Galloper Wind Farm Order 2013 (which included consent for a new national grid substation).</p> <p>The Applicants are not aware of any DCOs which exclude permitted development rights and for the reasons stated in response to Question 2.0.1 of the Applicants' Responses to Examining Authority's Written Questions 2, Volume 2 (REP6-059) consider such an exclusion to be wholly inappropriate.</p> <p>The Article only confirms that the DCO is a specific planning permission for the purposes of the section. This is consistent with the provisions of Section 264(6) which list other equivalent Parliamentary procedures.</p>



ID	SASES' Comment	Applicants' Comments
	in Article 33, and the definition in s 263(1)(b) TCPA 1990, that would continue to be OL.	
5	It follows that neither the Applicants nor NGET properly grapple with the issue raised by SASES in respect of the extent of OL. The issue still falls to be addressed.	Please see ID2.
6	SASES endorses the approach of East Suffolk Council, which has been further explained and justified in answer to the ExA's question 2.0.2 at D6 (REP6-079). SASES agrees that the particular sensitivity of Friston and the prospect of further development justifies the removal of PD rights. The uncertain extent of OL, and the risk that it may extend substantially beyond the land actually required for the authorised development following detailed design, provides a further justification for this approach.	The relevant permitted development rights do not have designation exclusions. Other permitted development rights are restricted by being within or adjacent to designations. These, however, engage formal designations. Friston is not located in such an area. See ID2 for response.



2.4 Applicants' Comments in Response to SASES' Comments on Deadline 6 Submissions

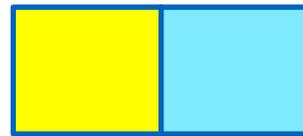
ID	SASES' Comment	Applicants' Comments
Appendix 1 - Outline Operational Drainage Management Plan		
1	<p>The OODMP has been updated since its last submitted version. Time does not permit a detailed critique or reporting of that review, however the following points remain a concern, and need to be considered at ISH11:</p> <ul style="list-style-type: none"> i) SPR considers this large-scale project does not require detailed flood risk assessment and mitigation design – this is clearly unacceptable given the clear increase in flood risk to Friston village created by the development; 	<p>The Applicants can confirm that there was an updated Outline Operational Drainage Management Plan (OODMP) submitted at Deadline 6 (REP6-017), and a further updated OODMP has been submitted at Deadline 8 (document reference ExA.AS-3.D8.V4).</p> <p>The Applicants note that this point is directed at ExA, however disagree with SASES' claim that the Applicants consider the Projects do not require a detailed flood risk assessment and mitigation design. The Applicants have already undertaken a flood risk assessment and have committed to undertake further analysis of flood risk and appropriate mitigation during detailed design. This is committed to in the OODMP (document reference ExA.AS-3.D8.V4) and secured in the draft DCO (updated version submitted at Deadline 8, document reference 3.1). When considering the implementation of the Projects, the flood risk to Friston village would in fact be decreased due to improvements in surface water drainage through a carefully designed infiltration / sustainable drainage system (SuDS) scheme and the mitigation planting proposed.</p>
2	<ul style="list-style-type: none"> ii) SPR states that by demonstrating an attenuation scheme can fit within the site area that a viable scheme exists – this is not consistent with the SUDS hierarchy which requires ground infiltration where possible, an approach that would increase the area required for drainage schemes; 	<p>The Applicants note that this point is directed at the ExA, however they disagree that the OODMP (REP6-017) does not incorporate the SuDS hierarchy throughout. Nevertheless, the Applicants have submitted an updated OODMP at Deadline 8 (document reference ExA.AS-3.D8.V4) which puts more emphasis on the SuDS hierarchy and infiltration being the primary option for drainage if proved viable post consent.</p>
3	<ul style="list-style-type: none"> iii) SPR use the QBAR to address TOTAL flow flood risk concerns – the QBAR derived does not consider the 	<p>The Applicants note that this point is directed at the ExA, however they disagree that the QBAR rate in the OODMP (REP6-017) does not consider</p>



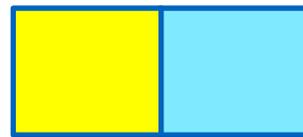
ID	SASES' Comment	Applicants' Comments
	<p>known ground depressions, wider catchment characterisation, or flow constraints of the Friston watercourse. As such the QBAR rates presented are poorly constrained, considered unreliable, and may be sufficiently large to still cause flooding in Friston;</p>	<p>the existing ground depressions, wider catchment characterisation or the current flow rate of the Friston Watercourse.</p>
4	<p>iv) SPR states the QBAR will be revisited post-approval using hydrological modelling – this is unacceptable, the QBAR is a primary design parameter for determining the size and therefore the viability and achievability of the on-site drainage schemes;</p>	<p>The Applicants note that this point is directed at the ExA, however maintain the position that further analysis informed by detailed site investigations, including the development of a hydrologic catchment model, should be undertaken post consent and used to inform the final infiltration / SuDS design.</p>
5	<p>v) SPR states the Friston catchment is ungauged, so no flow data exists – this will therefore constrain SPRs ability to accurately model the flows and therefore means the QBAR will remain uncertain. SPR should have installed flow monitoring gauging stations in the catchment 2 years ago, they have not;</p>	<p>The Applicants note that this point is directed at the ExA, however would like to highlight that they have committed to the pre-development QBAR rate not being increased post-development. The Applicant will undertake monitoring of the current QBAR rate during development of the hydrologic catchment model. Undertaking these assessments during detailed design will ensure that the data is as up to date as possible when the final infiltration / SuDS design is produced.</p>
6	<p>vi) SPR states they will include lost natural depression storage from one depression in the required storage calculations – this is unacceptable, all lost storage should be included, else flood risk will increase;</p>	<p>The Applicants note that this point is directed at the ExA, however disagree with SASES' comment as they have made a commitment to ensure that any existing depressions which are removed will be offset in the final infiltration / SuDS design. This is committed to in the OODMP (REP6-017) and secured in the draft DCO (updated version submitted at Deadline 8, document reference 3.1).</p>
7	<p>vii) SPR states the attenuation basins are not above ground level – this is wrong, they are bunded on their downslope side;</p>	<p>The Applicants note that this point is directed at the ExA, however as stated in the OODMP (REP6-017) the basins are not above ground level. The Applicants can only assume that SASES has concluded this from the</p>



ID	SASES' Comment	Applicants' Comments
		<p><u>indicative</u> drawings submitted in Appendix 3 and Appendix 5 of the OODMP (REP6-017). The Applicants would like to reiterate that these drawings were submitted for demonstration purposes only and that the final infiltration / SuDS design will be confirmed post consent.</p>
8	<p>viii) SPR hydraulic calculations show the proposed storage volumes are 5-10% more than the design storage volumes – but no sensitivity analysis is provided on the input parameters, the % is too small;</p>	<p>The Applicants note that this point is directed at the ExA, however disagree with SASES' statement. The indicative infiltration / SuDS design presented in the OODMP (REP6-017) not only proposes storage volumes of 5-10% higher than the volumes required, but also provides a 40% allowance for climate change. This has been agreed with SCC, as shown in the SoCG with ESC and SCC (document updated at Deadline 8, document reference ExA.SoCG-2.D8.V4).</p>
9	<p>ix) The total storage volumes presented, including freeboard and landscaping are so large to be captured by the Reservoir Act for the infiltration scheme and are just below the limit for the attenuation scheme – this highlights the risk presented by these basins when at maximum volume retention, the excessive inundation threat posed to the village, and the concerns over the lack of blockage analysis, lack of consideration of exceedance events and overtopping structures, and lack of engineering construction detail of the retention bunds;</p>	<p>The Applicants note that this point is directed at the ExA, however disagree with SASES' statement. Within the OODMP (REP6-017) it is explained that the Reservoir Act (1975) does not apply to the indicative infiltration / SuDS design presented due to the size of the basins proposed.</p>
10	<p>x) SPR states the wetland nature of the landscaping proposals for the basins – this is inconsistent with the need for extremely well managed attenuation structures to avoid loss of infiltration and minimise blockage risks and over-topping;</p>	<p>The Applicants note that this point is directed at the ExA, however would note that they have committed to continual maintenance of the final infiltration / SuDS design within the OODMP (REP6-107). The final maintenance plan will be confirmed once the final infiltration / SuDS scheme has been designed.</p>



ID	SASES' Comment	Applicants' Comments
11	xi) The SPR plan drawings of the attenuation basins show no outflow from the northern basin area – how does it empty and where does the discharge outfall go to.	The Applicants note that this point is directed at the ExA, however would like to clarify that the drawings presented in the OODMP at Deadline 6 (REP6-017) are indicative and therefore all of the details of the infiltration / SuDS design are not included. The northern basin will likely be connected to the southern basin and then drain down to the south, however this will be confirmed during detailed design.
12	There therefore remain considerable concerns on the adequacy of the OODMP, the viability and achievability of the proposed drainage schemes on-site, reliance on detailed design post-approval, the lack of baseline watershed characterisation, the lack of flood risk assessment of receptors in Friston, and the retention of such large volumes of water uphill of the village within semi-natural (wetland) and therefore difficult to maintain structures	The Applicants deem the proposed OODMP (document reference ExA.AS-3.D8.V4) to be adequate, however have submitted a Flood Risk and Surface Water Drainage Clarification Note at Deadline 8 (document reference ExA.AS-13.D8.V1) to provide further clarity on the Applicants' current position.
Appendix 1 – Outline Code of Construction Practice (CoCP)		
13	An updated OCoCP has been submitted by SPR. SPR state a Drainage Management Plan and Flood Management Plan will be produced as part of the final CoCP. SPR state attenuation ponds will be included to provide sufficient attenuation due to increased impermeable areas during the construction process. There are no other additional details provided by SPR.	Noted. The Applicants have further updated the Outline Code of Construction Practice (OCoCP) at Deadline 8 (document reference 8.1) with a new appendix setting out the principles of construction phase surface water drainage management. A final surface water and drainage management plan will be prepared post-consent as part of the final CoCP, which must be submitted to and approved by the relevant planning authority pursuant to Requirement 22 of the draft DCO (document updated at Deadline 8, document reference 3.1). The final surface water and drainage management plan will be based upon the detailed design and will, amongst other things, provide specific information regarding locations of ponds, run-off and sediment controls.



ID	SASES' Comment	Applicants' Comments
14	<p>The construction area is considerably larger than the operational area, it will be stripped of vegetation and soils and generate not only increased run-off flows, but also accelerate soil mobilisation and sediment loading in the run-off water – which will require removal prior to discharge.</p>	<p>Whilst the construction area is larger, this also provides opportunities for surface water management measures to be incorporated within such construction areas.</p> <p>An updated OCoCP will be submitted at Deadline 8 (document reference 8.1) and will present further explanation of such measures.</p>
15	<p>SPR have provided no details whatsoever of the construction phase surface water management scheme – no design storm return period, no estimate of increased run-off and sediment loading, no locations or sizing of ponds, no evidence the entire disturbed site can flow into those ponds, no details of turbidity clarification methods and what areas these require. In short there is negligible information presented which demonstrates SPR can manage surface water during the construction period.</p> <p>This remains unacceptable from both a flood risk and water quality perspective.</p>	<p>Requirement 22 of the draft DCO (document update at Deadline 8, document reference 3.1) commits the Applicants to submit a Surface Water and Drainage Management Plan post-consent, with approval from the relevant planning authority. Appendix 3 of the OCoCP submitted at Deadline 8 (document reference 8.1) covers surface water and drainage throughout the construction phase.</p>
Appendix 2 - Outline Code of Construction Practice		
16	<p>1.4 Control of Onshore Construction Works</p> <p>The OCoCP states that preparatory works will not be included in the final Code of Construction Practice (CoCP). SASES would like the Applicant to acknowledge that the OCoCP will apply to all works whether permanent or temporary. By its very nature some of the temporary works or preparatory works will be significant projects in their own right and may run over many years. This exclusion by the Applicant is of concern and the OCoCP should be amended accordingly. There are further comments on this principle set out towards the end of this note.</p>	<p>The Applicants note the new Requirement 26 within the draft DCO at Deadline 7 (REP7-006), which requires the approval of an Onshore Preparation Works Management Plan which will ensure that relevant onshore preparation works are subject to approval. An outline of the information that will be included within the Onshore Preparation Works Management Plan has been included in Appendix 1 of the OCoCP (an updated version has been submitted at Deadline 8, document reference 8.1).</p>



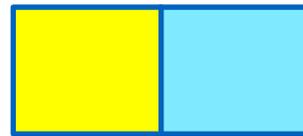
ID	SASES' Comment	Applicants' Comments
17	<p>2.4 Construction Principles</p> <p>The OCoCP states the appointed contractor will be encouraged to register with the Considerate Contractor Scheme. SASES would like to make sure this is a mandatory requirement for SPR to insist its contractor or contractors registers with the Considerate Contractor Scheme.</p>	<p>The Applicants note that there will be multiple contractors working on construction of the Projects and it is for each contractor to decide whether to register with the Consideration Constructor Scheme. Whilst the Applicants will encourage contractors join the scheme, it is not considered appropriate to require all contractors to register. The current provision within the OCoCP (document updated at Deadline 8, document reference 8.1) to encourage contractors to register with the scheme is considered to be appropriate and sufficient. All contractors procured are also bound by the contents of the plans applicable to their work such as the COCP and CTMP.</p>
18	<p>2.5 Construction Method Statements (CMS)</p> <p>The CMS should also take account of noise and to limit noise – this is not specifically mentioned in this section but may be covered under one of the Environment Agency Pollution Prevention Guidance documents. It is not clear whether noise has been included in this section and it would help if reference to noise can be added to make it clear method statements will address noise.</p>	<p>The Applicants note that the OCoCP has been updated at Deadline 8 (document reference 8.1) with a firm commitment to apply for Section 61 consent under the Control of Pollution Act 1974 (COPA). This approach is considered appropriate and sufficient to control construction phase noise and was confirmed by SASES during Issue Specific Hearing 12 on 11th March 2021.</p>
19	<p>3.0 General Site Operations</p> <p>SASES has previously requested the Applicant review working hours but this has not been taken into account which still shows 7am- 7pm Monday to Friday and 7am – 1pm Saturday. SASES requests again that weekday working hours on site should be substantially reduced and weekend working should not be permitted when in close proximity to residential receptors, in particular Friston and where people live within close proximity to the cable corridor. Noisy works should be limited between 10:00 and 16:00. This point has been made previously but is stated</p>	<p>The Applicants note that the working hours specified within the draft DCO (document updated at Deadline 8, reference 3.1) are required to deliver the Projects on programme. However, following representations made at Issue Specific Hearing 12, the Applicants have amended the OCoCP at Deadline 8 (document reference 8.1) with reference to core working hours between the hours of 0800 hours and 1800 hours on weekdays (excluding bank holidays) and from 0800 hours to 1300 hours on Saturdays. To maximise productivity within the core working hours, the Applicant's contractors will require a period of up to one hour before (Monday to Saturday) and up to one hour after (Monday to Friday) core working hours for start-up and close-down of activities. This will include (but not be limited to) deliveries, movement to place</p>



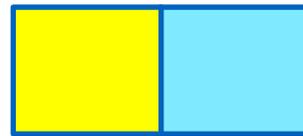
ID	SASES' Comment	Applicants' Comments
	<p>again at this deadline as due to the proximity to residential receptors, the quality of life, health and wellbeing of residents will be severely damaged over many years. Weekend working should not be allowed except in cases of emergency if the DCO is approved.</p>	<p>of work, unloading, maintenance and general preparation work. This will not include operation of plant or machinery likely to cause a disturbance to local residents or businesses.</p> <p>In addition, the OCoCP updated at Deadline 8 commits the Applicants to engaging with noise sensitive receptors in accordance with the Stakeholder Communication Plan and preparing specific noise control plans for each of these premises.</p>
20	<p>3.3 Screening</p> <p>There is no mention of temporary acoustic baffles within this section although reference is made under section 9.1 to help to reduce construction noise. SASES requests that acoustic baffles and screening should be included as a mandatory requirement to be incorporated within the final OCoCP.</p>	<p>The Applicants note that Section 3.3 of the OCoCP (document updated at Deadline 8, document reference 8.1) relates to screening and fencing from a safety and security perspective. Construction noise control measures are specifically referred within Section 9 of the OCoCP (document updated at Deadline 8, document reference 8.1).</p>
21	<p>3.4 Site Induction</p> <p>All construction operatives, sub-contractors and onsite workforce should be accredited to the nationally accepted standard of the 'Construction Skills Certification Scheme' (CSCS), individuals should hold personal CSCS cards which should be verified as part of the site induction process.</p>	<p>Having the CSCS qualification and card, is standard within the onshore construction industry, so a vast majority of all the construction operatives, sub-contractors and onsite workforce will hold a CSCS card. However, there are alternative, equivalent cards which are often held by specialist international contractors who may be required for onsite works for a short period of time. In this case, they may not have a CSCS card, however the Applicants' procurement team will ensure that the card held is of equivalent stature and in any event all construction operatives, sub-contractors and onsite workforce will be appropriately trained.</p>
22	<p>3.7 Artificial Light Emissions</p> <p>Artificial lighting should not be allowed during the non-working hours and should be automatically extinguished, and this requirement should be set out in the Artificial Light Emissions</p>	<p>The Applicants note that certain activities may be permitted outside of the working hours specified within the draft DCO (document updated at Deadline 8, document reference 3.1) with prior written approval from the relevant planning authority and for which specific task lighting will be required. However, where essential works outside of the working hours specified within</p>



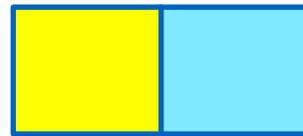
ID	SASES' Comment	Applicants' Comments
	<p>Management Plan. Lower level security lighting should not be used unless activated by automated movement sensors. There should be no reason to use generators on site except where there is loss of power and mains power should be used throughout preparatory works and construction works. SASES do not support the use of temporary power generation during or after construction works. The OCoCP should be updated accordingly.</p>	<p>the draft DCO (document updated at Deadline 8, document reference 3.1) are not undertaken, construction phase lighting will be switched off outside of those hours.</p> <p>Lower-level lighting is required outside of the working hours for safety and security purposes but will not be intrusive by virtue of its lower level.</p> <p>Generators are an essential component of any construction site and are therefore necessary for the safe and efficient delivery of the works, providing power to essential plant where a connection to mains power cannot be established. As such, the Applicants are unable to commit to no temporary power generator during or after construction works.</p>
23	<p>9.1 Control Measures (noise and vibration)</p> <p>This clause refers to best practice noise mitigation that will be typically adopted by the contractor. There is a brief note about acoustic barriers and screens stating they may be used but the OCoCP then it leaves this decision to the contractor when the CoCP is prepared.</p> <p>SASES would like an undertaking from the Applicant that they will mandate the use of acoustic screens, panels and barriers rather than relying on the contractor to make this decision. This requirement should be passed down to the contractor as a specific contractual term and not be left to the construction contractor to decide whether this type of best practice will be adopted. The OCoCP should go much further than stating the plan 'will typically include then list a number of best practice mitigation measures.' The OCoCP should mandate and insist the contractor uses acoustic baffles and screening whether pre construction or during construction works.</p>	<p>The Applicants have updated the OCoCP at Deadline 8 (document reference 8.1) to include further detail and commitments regarding construction noise controls. The updated OCoCP (document updated at Deadline 8, document reference 8.1) makes a clear commitment for the contractor to obtain consents under the COPA from the relevant planning authority prior to the relevant works commencing.</p>



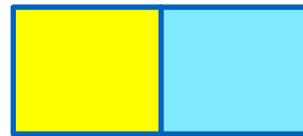
ID	SASES' Comment	Applicants' Comments
24	<p>10.1 Control Measures</p> <p>The OCoCP mentions an Air Quality Management Plan will be developed. As part of this plan any vehicles whether HGV on/off site including Non-Road Mobile Machinery or vehicles transporting materials or vehicles removing spoil etc should comply to Euro V1 emissions standards to minimise pollution and noise.</p>	<p>The OCoCP updated for Deadline 8 (document reference 8.1) and Outline Construction Traffic Management Plan (OCTMP) (document updated at Deadline 8, document reference 8.9) make clear commitments to the proportion of construction vehicles required to comply with Euro VI emissions standards. Regarding Non-Road Mobile Machinery (NRMM), the Applicants have clarified their position within the updated OCoCP (document updated at Deadline 8, document reference 8.1)..</p>
25	<p>10.1.1 Access Strategy (Vehicles)</p> <p>No vehicles whether HGV, transit vans or any vehicle used by site operatives must not be allowed to access Mill Road in Friston from the A1094 or to access Mill Road to access the A1094 from Friston or to access Grove Road as rat runs or use the B1121 through Friston to access the construction site whether this is for preparatory works, pre-construction or for construction works.</p> <p>SASES notes that the Applicant intends to access the site using one of the footpaths from Grove Road for pre-construction works. SASES wants to make it clear that this would create major problems on local village roads, impact on the local community and the use of transit vans or other vehicles to access the site pre construction or during construction is an unacceptable approach.</p> <p>These caveats and exclusions are not specifically stipulated in the OCoCP and must not be allowed to happen. It needs to be made clear in the OCoCP that the use of Mill Road, Grove Road or any footpath from Grove Road is an unacceptable methodology whether during the pre-construction phase or during construction works.</p>	<p>The OCTMP (document updated at Deadline 8, document reference 8.9) contains details of measures to ensure that HGVs use only the agreed routes. No HGV construction traffic would use Grove Road, Mill Road or the B1122 through Friston.</p> <p>With regards to vehicles used by site operatives (i.e. non HGV traffic) the Applicant would not preclude local routes being used should the employees' journey origin dictate these are the most direct route to onshore access locations (e.g. local based employees served by these routes). Notwithstanding, it is considered that both Mill Road and Grove Road would not provide a commodious route and would therefore be unlikely to be used.</p> <p>During the Onshore Preparation Works, the Applicants propose that construction traffic movements would be managed through measures to be contained within an Onshore Preparation Works Management Plan. The OAMP (document updated at Deadline 8, document reference 8.10) provides an outline of measures that would be implemented post-consent (within the Onshore Preparation Works Management Plan) to control traffic movements during the construction of the accesses and crossings.</p>



ID	SASES' Comment	Applicants' Comments
	<p>SASES requests the Applicant amends the OCoCP and this exclusion is added to the final version when published.</p>	
26	<p>10.1.7 HGV Emissions</p> <p>SASES appreciates the Applicant wishes to have 70% of vehicles adopting Euro V1 standard. However, taking into account air quality, the impacts of other projects particularly Sizewell C and the rural nature of the environment, the Applicant should ensure its contractor uses 100% Euro V1 standard vehicles.</p> <p>SASES requests the Applicant makes it a contractual obligation within the OCoCP, passed down to the contractor that all vehicles will comply with Euro V1 standards. These minimum standards should apply to all construction works carried out including along the cable corridor, the Construction Consolidation Sites and must be a specific requirement to be set out in the OCoCP. There is reference to when the two villages are bypassed and reference to “where possible” should be deleted. The use of the highest quality vehicles reducing environmental impact and adopting best practice taking into account climate change and the potential for these projects to be constructed over many years means the use of the words “where possible” should be deleted. Vehicle particulates and pollutants need to be minimised and this condition should be clearly stated in the OCoCP.</p>	<p>The Applicants consider a 100% commitment to Euro VI emissions standards to be disproportionate and unrealistic. This would mean that, in the event a specific type of vehicle required for the successful delivery of the Projects is not available to a Euro VI standard, the Projects would be unduly delayed until such time that a vehicle had been manufactured and commissioned., as agreed with the councils Statement of Common Ground with East Suffolk Council and Suffolk County Council (document reference ExA.SoCG-2.D8.V4).</p>
27	<p>11.1.1 Sediment Management</p> <p>Paragraph 123 which is a newly added clause should be omitted which refers to clause 120. The provisions set out in clause 11.1.1 should apply to all areas identified as being at flood risk or not. This is just good practice.</p>	<p>The Applicants note that the text at paragraph 123 of the OCoCP submitted at Deadline 6 (REP6-003) was included at the request of SCC as the Lead Local Flood Authority. The Applicants therefore intend to retain this text unless otherwise instructed by SCC.</p>



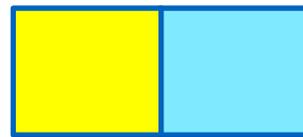
ID	SASES' Comment	Applicants' Comments
		<p>The in-text cross reference to paragraph 120 has been updated within the updated OCoCP submitted at Deadline 8 (document reference 8.1) to refer to the correct paragraph.</p>
28	<p>Appendix 1 Provisions Section 1 & 2 Introduction and Onshore Preparation Works</p> <p>Any pre construction preparatory works should be carried out in accordance with the principles set out in the OCoCP. Each section of preparatory works should have its own method statement, its own CoCP, its own Construction Phase Plan to meet minimum standards where working hours and other delivery principles should be in accordance with the final version of the OCoCP. The purpose of the appendix could circumvent the conditions set out in the OCoCP which would be an unacceptable approach.</p> <p>There are various provisions that seek to create standalone management plans and some activities that the appendix seeks to exclude obligations, such as a statement for example, that preparation works in connection with archaeological investigations will not be subject to an onshore works Management Plan. Preparation works in connection with Highway Access, Public Rights of Way, pre-planting etc are being requested to be discharged through other plans. However, the principles set out in the OCoCP should apply to all preparatory works and pre construction works. The Applicant is seeking to limit its approach, methodology and to move away from the principles set out in the OCoCP. This is an unacceptable approach potentially creating risk and uncertainty for the region, local people and rural villages.</p>	<p>The Applicants reiterate that the nature of the works anticipated to comprise the onshore preparation works are small scale in extent and of short duration. Therefore, the Applicants' position is that applying the controls of the final CoCP to such works is disproportionate and unwarranted, The Applicants have committed to providing Onshore Preparation Works Management Plans for the onshore preparation works to the relevant planning authority for approval ahead of such works, as secured through Requirement 26 of the draft DCO (an updated document has been submitted at Deadline 8, document reference 3.1). This is considered to provide a proportionate level of control for the activities associated with the onshore preparation works and has been agreed by ESC and SCC (the Councils).</p>



ID	SASES' Comment	Applicants' Comments
29	<p>Appendix 1 – Section 3 – Onshore Works Management Plan</p> <p>This new clause seeks to set out its own rules outside those stipulated in the OCoCP and this is unacceptable as working hours, delivery programme, timing, HGV access, noise etc seeks to set new provisions to be determined, with obligations to be agreed that could severely impact on local people and the environment.</p> <p>The provisions of Appendix 1 appear to try and create an “agreement to agree” which is unacceptable. The principles of working hours, noise, emissions, HGV movements, Euro V1 standards etc as set out and agreed in the OCoCP must also apply to any preparatory or pre construction works including sign off and approval by the relevant authority, including Highways etc.</p> <p>SASES requests that the Applicant adheres to all of the principles of the OCoCP for temporary or preparatory works when it's finally agreed. Reference to Appendix 1 should be deleted and all works whether preparatory works, pre- construction works, or construction works should be delivered in accordance with the final version of the OCoCP.</p>	<p>The Applicants note that the inclusion of Appendix 1 of the OCoCP submitted at Deadline 6 (REP6-003) responded to and, indeed, has addressed previous concerns raised by the Councils regarding the level of control afforded to activities comprising the onshore preparation works. The Applicants note that the final Onshore Preparation Works Management Plan must be submitted to and approved by the relevant planning authority in consultation with SCC prior to the commencement of the specified onshore preparation works, pursuant to Requirement 26 of the draft DCO (document updated at Deadline 8, document reference 3.1). The Applicants consider this an entirely reasonable mechanism and appropriate approach for applying controls to onshore preparation works.</p>
Appendix 3 – Outline Watercourse Crossing Method Statement		
30	<p>SASES appreciates the further information provided by the Applicant at Outline Watercourse Crossing Method Statement Rev 02.</p>	<p>Noted.</p>
31	<p>The Applicant has cited several disadvantages of using an alternative microtunneling solution but has not described a feasible scheme nor quantified any of the disadvantages.</p>	<p>The Applicants provided a rationale for why they believe a micro-tunnelling technique at the Hundred River crossing location is not possible within the Outline Watercourse Crossing Statement submitted at Deadline 6 (REP6-</p>



ID	SASES' Comment	Applicants' Comments
	<p>Therefore it is not possible for SASES to assess whether the benefits to the integrity of the river, the ecology of River Hundred and Sandlings SPA, local residents, and landscape from such an approach would be more or less beneficial than the Open Cut method proposed.</p>	<p>041). The Applicants are confident that the methodologies for crossing the Hundred River set out within the Outline Watercourse Crossing Statement (REP6-041) together with the measures proposed are viable.</p>
32	<p>The Applicants have commented further on this topic in 'Applicants' Comments on SASES Deadline 5 submissions' at 2.3 Further Comments on Applicants' Outline Watercourse Crossing Method Statement stating:</p> <p>"When accounting for the additional lateral distance required to reach sufficient depths to drill beneath the bed of the Hundred River, beneath the B1122 Aldeburgh Road and underneath the woodland west of Aldeburgh Road, the Applicants calculate a drill length of at least 500m. Further details on the suitability of microtunneling have been included within the updated Outline Watercourse Crossing Method Statement at Deadline 6 (document reference ExA.AS-5.D6.V2)" .</p> <p>From our understanding of the differences between HDD and microtunnelling, it would appear this reference is in respect of HDD not Microtunnelling techniques.</p>	<p>The comments made in the Applicants' Comments on SASES Deadline 5 Submissions referred to by SASES are in relation to a micro-tunneling technique. The Applicants refer SASES to Appendix 2 of the Outline Watercourse Crossing Statement (REP6-041) where they provide a rationale for why they believe a micro-tunnelling technique at the Hundred River crossing location is not possible. The additional lateral distance would be required to facilitate the construction and installation of two large caissons / pits (at entry / exit points) for the machine drill head to be installed and removed, as well as to accommodate a large compound associated with drilling works.</p>
<p>Appendix 4 – Ecology Survey Results</p>		
33	<p>Background</p> <p>SASES has previously highlighted serious deficiencies and errors in the results of EIA 2018 Extended Phase 1 Habitat Survey APP-277 Map 22.4c and APP-503 for the Aldringham and River Hundred area. Those surveys identified only one Target Note</p>	<p>To reiterate what the Applicants have stated at hearings and various submissions to the Examinations, all ecological surveys that informed the Applications were undertaken by suitably qualified ecologists and within the optimal surveying windows. All surveys have been undertaken in accordance with industry guidance (such as but not limited to the Handbook for Phase 1 Habitat Survey (JNCC)). In accordance with this guidance, the habitats have</p>



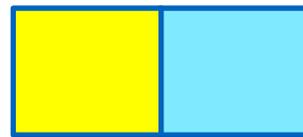
ID	SASES' Comment	Applicants' Comments
	<p>(TN10b) in the entire area of Works No 19 to the east of Aldeburgh Road and only one (TN162a) in the whole area of woodland (Aldringham Group Tree Preservation Order SCDC/87/00030) to the west of Aldeburgh Road. No Target Notes had been identified in the 2018 Extended Phase 1 Habitat Survey within the area of Priority Deciduous Woodland Habitat designated as such by Natural England. The description and photographs of Oak TN10b were incorrect and portray a very different oak tree, to be found further north and apparently beyond Works No 19 order limits, while the notable oak referred to in this the Applicants' latest visit to the site on 15th 16th February 2021 as TN15 was entirely absent from 2018 Extended Phase 1 Habitat Survey, despite being the most impressive Oak in the River Hundred valley and situated within the Cable Corridor Order Limits.</p> <p>The Applicant did not present evidence of any Ecological Survey prior to 2018. We believe that to have been a serious omission, given the earlier decision by SPR in July/ September 2017 to select that place for its Cable Corridors. SASES has repeatedly requested sight of the Applicants' Optioneering /Feasibility reports that SPR has claimed support its selection of a crossing place along the Aldeburgh Road, but without response. Similarly, the Applicant has failed to release the 'Wardell Armstrong Report' on its Landfall selection, the result of which must have led to the need for a cable route across the Aldeburgh Road.</p> <p>The Applicants have consistently stated that this was the only feasible crossing point and therefore it is all the more surprising that no comprehensive ecology assessment of these habitats was ever made prior to these ExA Hearings. The absence of any</p>	<p>been assigned the appropriate classification based on the species noted at the time of the surveys. Furthermore, species-specific guidance and standards have been used when assessing habitats for their suitability to support legally protected and notable species.</p> <p>In line with said guidance, Target Notes (TN) have been used at the discretion of field surveyors to highlight points of ecological interest at the time of the survey. TNs are not exhaustive and have therefore only been used where deemed necessary; it is not practical to TN every feature within a survey area. To note, the Applicants did record the oak tree referred to during both the 2018 and 2021 surveys. It was assessed for its potential to support roosting bats and nesting birds (including Schedule 1 species).</p> <p>As already noted in in the Applicants' Deadline 7 submission (REP7-059), it is misleading of SASES to continually refer to 'Priority Habitat' as being designated in its submissions. Priority Habitat is neither a statutory nor non-statutory designation. Priority Habitats, or UK 'Habitats of Principal Importance' (as identified in Section 41 of the Natural Environment and Rural Communities Act (2006)) are those for which public bodies must account during their own operations.</p> <p>Also as noted in in the Applicants' Deadline 7 submission (REP7-059) SASES' assertions regarding the timing of surveys and key project decisions are incorrect. An extended Phase 1 habitat survey of the full indicative onshore development areas (including the location of the Hundred River crossing) was undertaken by professional ecological surveyors in April 2018. The decision to locate the onshore substations and National Grid infrastructure in 'Zone 7' (as identified in APP-443), thus necessitating the Hundred River crossing, was not made until December 2018.</p> <p>Engineering feasibility considerations have influenced the project definition as presented with the Applications and make up a wide spectrum of</p>



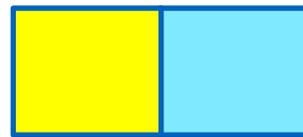
ID	SASES' Comment	Applicants' Comments
	<p>Target Note within the area of woodland between the west bank of the river and Aldeburgh Road, a rich habitat of live and decaying trees, would seem to indicate that the Surveyors ignored the allegedly Wet Woodland area altogether in their previous 2018 Extended Phase 1 Habitat Survey.</p> <p>We believe the Applicant was incorrect in stating at ISH7 that gorse, holly and horse chestnut had been observed on the alleged Wetland. It is possible that she was referring to TN162A to the much drier west of Aldeburgh Road where those species were indeed noted in the 2018 Extended Phase 1 Habitat Survey. Gorse, holly and horse chestnut are not present on the alleged wetland now and that is now verified by TN17 – TN35 of this latest 15th 16th February assessment.</p>	<p>contributions, including workshops and meetings. Such information informed project route selection which was then followed through with more environmental appraisal.</p>
34	<p>Re; Survey Results for Applicants' visit to site on 15th & 16th February 2021</p> <p>It is noteworthy that the Applicants have only at this late stage identified twenty-five Target Note observation points, all within Works No 19, three within the meadow on east side of river and twenty-two on the area of Priority Deciduous Woodland between River Hundred and Aldeburgh Road that has been described by SEAS as 'Wet Woodland.</p> <p>Contrary to the Applicant's report at ISH7, that area of woodland was wet on date of visit and has remained so during the three weeks following that visit. SASES has been carrying out daily wetness measurements since ISH7 using a basic horticultural soil hygrometer. The results for that area of land between 4 metres</p>	<p>TNs have been used at the discretion of field surveyors to highlight points of ecological interest at that time of the survey. TNs are not exhaustive and have therefore only used where deemed necessary; it is not practical to TN every feature within a survey area.</p> <p>The Applicants' classification of the woodland at the Hundred River is based on the species present rather than moisture levels in the ground (in line with the JNCC Handbook for Phase 1 Habitat Survey (2016)). The species found during surveys in both 2018 and 2021 did not comprise those associated with wet woodland. The classification was supported by the independent site visit undertaken by ESC and SCC ecologists, as confirmed verbally to the ExA at ISH7 and subsequently supported by ESC's written submission at Deadline 6 (REP6-075).</p>



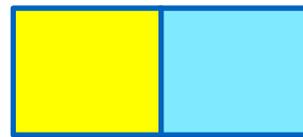
ID	SASES' Comment	Applicants' Comments
	<p>from riverbank to 2 metres from Aldeburgh road have all indicated wetness at the maximum of the instrument's wetness scale.</p> <p>SASES appreciates the Applicants' difficulties in identifying plant life at the dead of winter and amidst large areas of snowdrift. However, we feel it unaccountable that the Applicant has omitted to mention and highlight the extensive areas of dead stalks of wetland loving Himalayan Balsam a wetland plant which is pervasive on the land. On the other hand we are not aware of any teasel there.</p> <p>We feel the Applicants must be mistaken in concluding that the area was dry on those days and request evidence of any soil hygrometer measurements they may have taken on that piece of land during their visit.</p> <p>A significant proportion of the trees on this piece of land have fallen, many incidentally now providing an ideal habitat for an extensive variety of biota. This must be a further indication of the wetland soil structure. It is surprising that the Applicants' survey has ignored this evidence.</p> <p>For the reasons above, SASES is unable to accept the conclusion inferred by this Ecology Survey Results report that this area is not "wet woodland"</p>	<p>As stated in the 2018 Extended Phase 1 Habitat Survey Report (section 22.4.2.2.9 of APP-277), Himalayan balsam has been recorded along the Hundred River.</p>
<p>Appendix 5 - Applicants' Submission of Oral Case – ISH7 Biodiversity and HRA</p>		
35	<p>2.1.1 Priority deciduous woodland- wet woodland – Applicants' Paragraph 9 and the 2018 Extended Phase 1 Habitat Survey</p>	<p>Please see response at ID33.</p>



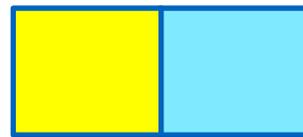
ID	SASES' Comment	Applicants' Comments
	<ol style="list-style-type: none"> 1. SASES has previously highlighted serious deficiencies and errors in the 2018 Extended Phase 1 Habitat Survey results for the Aldringham and River Hundred area. It had identified only one Target Note (TN10b) in the entire area of Works No 19 to the east of Aldeburgh Road and only one (TN162a) in the whole area of woodland (Aldringham Group Tree Preservation Order SCDC/87/00030) to the west of Aldeburgh Road. 2. No Target Notes were identified in the 2018 Extended Phase 1 Habitat Survey within the area of woodland on the west side of the River Hundred designated by Natural England as Priority Habitat Deciduous Woodland. 3. The description and photographs of Oak TN10b were incorrect and portrayed a very different oak tree, to be found further north and apparently beyond Works No 19 order limits. 4. The notable oak referred to as TN15 in the Applicants' latest visit to the site on 15th 16th February 2021 is entirely absent from 2018 Extended Phase 1 Habitat Survey despite being the most impressive Oak in the River Hundred valley and situated within the Cable Corridor Order Limits. 5. The Applicant has not presented evidence of any Ecological Survey prior to 2018. We believe that to have been a serious omission, given the earlier decision by SPR in July/ September 2017 to select that place for its Cable Corridors. SASES has repeatedly requested sight of the Applicants' Optioneering /Feasibility reports on 	



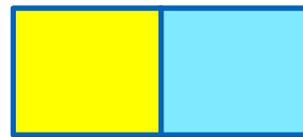
ID	SASES' Comment	Applicants' Comments
	<p>where SPR's selection of a crossing place along the Aldeburgh Road, but without response. Similarly, the Applicant has failed to release the 'Wardell Armstrong Report' on its Landfall selection the result of which must have led to the need for a cable corridor crossing route on the Aldeburgh Road.</p> <p>6. The Applicants have consistently stated that this was the only feasible crossing point and therefore it is all the more surprising that no comprehensive ecology assessment of these habitats was ever made prior to these ExA Hearings. The absence of any Target Note within the area of woodland between the west bank of the river and Aldeburgh Road, a rich habitat of live and decaying trees would seem to indicate that the Surveyors ignored the alleged wet woodland area altogether in their previous 2018 Extended Phase 1 Habitat Survey.</p> <p>7. We believe the Applicant was incorrect in stating at ISH7 that gorse, holly and horse chestnut had been observed on the alleged Wetland. It is possible that she was referring to TN162A which was located in the centre of the dry woodland west of Aldeburgh Road and where those plant species were indeed noted in the 2018 Extended Phase 1 Habitat Survey. Gorse, holly and horse chestnut are not present on the alleged wetland now and as confirmed in TN17 – TN35 of the latest 15th 16th February assessment.</p>	



ID	SASES' Comment	Applicants' Comments
36	<p>2.1.1 Priority deciduous woodland- wet woodland – Applicants' paragraph 9 – 11 referring to a revisit to site on 15th and 16th February 2021</p> <ol style="list-style-type: none"> 1. It is noteworthy that the Applicants have only at this late stage identified twenty-five Target Note observation points, all within Works No 19, three within the meadow on east side of river and twenty-two on the said area of land that has been described by SEAS as wetland between the river and the Aldeburgh Road. 2. Contrary to the Applicant's report at ISH7, that area of woodland was wet on date of visit and has remained so during the three weeks following that visit. SASES has been carrying out daily wetness measurements since ISH7 using a basic horticultural soil hygrometer. The results for that area of land between 4 metres from riverbank to 2 metres from Aldeburgh road all have been at the maximum of the instruments wetness scale despite recent relatively dry weather. 3. SASES appreciates the Applicants' difficulties in identifying plant life at the dead of winter and amidst large areas of snowdrift. However, we feel it unaccountable that the Applicant has omitted to mention and highlight the extensive areas of dead stalks of wetland loving Himalayan Balsam a wetland plant which is pervasive on the land. On the other hand we are not aware of any teasel there. 4. We feel the Applicants must be mistaken in concluding that the area was dry on those days and request 	Please see response at ID34.



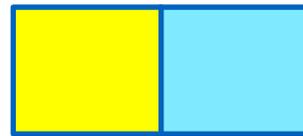
ID	SASES' Comment	Applicants' Comments
	<p>evidence of any soil hygrometer measurements they may have taken on that piece of land during their visit.</p> <p>5. A significant proportion of the trees on this piece of land have fallen, many incidentally now providing an ideal habitat for an extensive variety of biota. This is surely a further indication of the wetland soil structure and it is highly surprising that the Applicants' survey has ignored this evidence.</p> <p>6. SASES would assert that support for a conclusion that the land is not wet woodland from Suffolk County Council and East Suffolk District Council ecologists who visited Aldringham on the same day must be discounted, for the simple reason that it has since been admitted that neither one of them entered on to the land and therefore could not have made an objective and independent assessment from afar.</p> <p>7. For the reasons above, SASES is unable to accept the Applicants' Oral Case "that this area does not comprise wet woodland".</p>	
37	<p>2.1.2 Adjacent Meadow and Hair Dragonfly</p> <p>SASES has no comment at Deadline 7.</p>	Noted.
38	<p>2.1.3 Watercourse Crossing Method Statement</p> <p>SASES appreciates the further information provided by the Applicant at Outline Watercourse Crossing Method Statement Rev 02.</p>	The Applicants refer to their comments at ID31 and ID32.



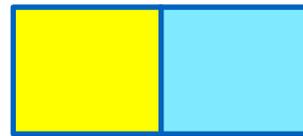
ID	SASES' Comment	Applicants' Comments
	<p>The Applicant has cited several disadvantages of using an alternative microtunneling solution but has not described a feasible scheme nor quantified any of the disadvantages. Therefore it is not possible for SASES to assess whether the benefits to the integrity of the river, the ecology of River Hundred and Sandlings SPA, local residents, and landscape from such an approach would be more or less beneficial than the Open Cut method proposed.</p> <p>The Applicants have commented further on this topic in 'Applicants' Comments on SASES Deadline 5 submissions' at 2.3 Further Comments on Applicants' Outline Watercourse Crossing Method Statement saying:</p> <p>"When accounting for the additional lateral distance required to reach sufficient depths to drill beneath the bed of the Hundred River, beneath the B1122 Aldeburgh Road and underneath the woodland west of Aldeburgh Road, the Applicants calculate a drill length of at least 500m. Further details on the suitability of microtunneling have been included within the updated Outline Watercourse Crossing Method Statement at Deadline 6 (document reference ExA.AS-5.D6.V2)" . From our understanding of the differences between HDD and microtunnelling, it would appear this reference is in respect of HDD <u>not</u> Microtunnelling techniques.</p>	
39	<p>2.2.1 – 2.2.4</p> <p>SASES has no comment at Deadline 7.</p>	Noted.
40	<p>2.2.5 Trees and Hedgerows</p>	<p>The Applicants identified the important hedgerows within the <i>Important Hedgerows and Tree Preservation Order Plan</i> (REP3-010) as per the</p>



ID	SASES' Comment	Applicants' Comments
	<p>The Applicants have submitted Important Hedgerows and Tree Preservation Plans (REP3-010). However not all Protected and Important Hedgerows have been identified on these plans.</p> <p>Government guidance on Countryside hedgerows: protection and management can be found here: https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management.</p> <p>This guidance identifies Protected Hedgerows as having the following characteristics: more than 20m long with gaps of 20m or less in its length; less than 20m long, but meets another hedge at each end.</p> <p>With regard to location, a hedgerow is protected if it is on or next to: land used for agriculture or forestry; land used for breeding or keeping horses, ponies or donkeys; common land; a village green; a site of special scientific interest; a protected European site; a local or national nature reserve or land belonging to the state. A hedgerow is not protected if it is in, or marks the boundary of, a private garden.</p> <p>None of the Applicants' Hedgerow Plans refer to Protected Hedgerows, of which there are many throughout this mainly agricultural area. It should be noted that there is an unlimited fine if Protected Hedgerows are removed without consent.</p> <p>The Applicants have stated that there are 67 Important Hedgerows which require removal. However this number of affected hedgerows is significantly understated as no Protected Hedgerows have been identified on the plans. An Important Hedgerow has different criteria, as follows: it is at least 30 years old; marks all or part of a parish boundary that existed before</p>	<p>criteria set out in the Hedgerows Regulations 1997. The Applicants consider that identifying important hedgerows to be removed or be crossed by the onshore cable route using a reduced working width is appropriate and proportionate. The removal of other hedgerows will be controlled through the approval of the Ecological Management Plan in accordance with Requirement 21 of the DCO.</p>



ID	SASES' Comment	Applicants' Comments
	<p>1850; contains an archaeological feature; is in or next to an HER: marks the boundary of an estate that existed before 1600; is part of a field system that existed before 1845; contains protected or endangered species; includes woody species specified in Schedule 1 of the Hedgerow Regulations.</p> <p>Selecting just 'Important' Hedgerows has resulted in Protected Hedgerows being omitted from the DCO. This area of East Suffolk is rich in hedgerows and there will be wholesale destruction along the full length of the cable route and substation site resulting in a dramatic change in character of the area and loss of habitat for wildlife.</p> <p>The Applicants' classification of two hedges either side of Fitches Lane, Aldringham demonstrates the fallacy in the Applicant's approach. The hedgerow on the north side of footpath 7 is deemed to be unimportant while the hedgerow on its south side has been classified as Important. They are both ancient and in places, they complement and overhang each other forming an attractive archway, but the Applicant has classified them differently.</p>	
41	<p>Re: Applicants' paragraph 8 regarding Important Hedgerow 21 (approximately 250m long)</p> <p>At ISH7, Mr McGrellis, SPR Onshore Consents Manager on behalf of the Applicants made a commitment that although the whole length of this hedge is designated for removal on sheet 5 of 2.10 Important Hedgerows and Tree Preservation Order Plan APP-020, no more than a maximum of 27.1 metres would actually be removed. It is most disappointing to read in Applicants'</p>	<p>The Applicants note an error in the oral submission made at Issue Specific Hearing 7 regarding the length of specific hedgerows required to be removed and clarified this within their Written Summary of Oral Case: ISH7 submitted at Deadline 6 (REP6-052).</p>



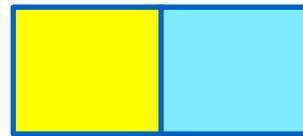
ID	SASES' Comment	Applicants' Comments
	paragraph 8 of their ISH7 Oral Case that the Applicant has withdrawn that commitment.	
Appendix 6 – Applicants' Responses to Hearing Action Points – ISH7		
42	<p>Hundred Wood</p> <p>Action Point : Applicants to submit updated habitat surveys of the woodland to the west of the Hundred River and the adjacent meadow, with relevant accompanying explanatory text, including an assessment of the potential for micro-siting to avoid features of importance.</p> <p>Applicants' Response : As outlined in the Outline Landscape and Ecological Management Plan, a pre-construction walkover survey would be undertaken by the Arboricultural Clerk of Works and Ecological Clerk of Works and an engineer to assist in micro-siting along the onshore cable route to minimise woodland, tree and scrub loss where practicable. This will include (as an example) the micro-siting of spoil storage or temporary lay down areas to allow the retention of trees where possible.</p> <p>SASES Comments: We refer to the Applicants' Deadline 6 'Ecology Survey Results, section 3.1 Work No 19 and to SASES Deadline 7 Comments on Applicants Submission of Oral Case – ISH7 Biodiversity and Habitats Regulation Assessment, Section 2.1 which contains SASES comments on those results.</p>	The Applicants have no further comment.
43	Watercourse crossing method statement	The Applicants refer to their comments at ID30 to ID32 regarding the Outline Watercourse Crossing Method Statement (REP6-041), and to their comments at ID35 to ID41 above regarding the Applicants' Written Summary of Oral Case: ISH7 (REP6-052).



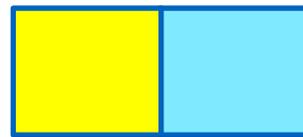
ID	SASES' Comment	Applicants' Comments
	<p>Action Point : Updated watercourse crossing method statement to be submitted by Applicants, to including a more detailed justification for the trenching methodology proposed.</p> <p>Applicants' Response : The Outline Water Course Crossing Method Statement has been updated and submitted at Deadline 6 (document reference ExA.AS-5.D6.V2).</p> <p>SASES Comments: We refer to SASES Deadline 7 Comments on Applicants Submission of Oral Case –ISH7 Biodiversity and Habitats Regulation Assessment, 2.1.3 Watercourse Crossing Method Statement which contains SASES comments on Outline Water Course Crossing Method Statement v2.</p>	
Appendix 7 - Traffic and Transport Documents		
44	<p>Outline Travel Plan</p> <p>Para 7 Introduces the term “....two certified plans referred to in draft DCO...” Document then refers to 4 plans</p> <p>Outline Access Management Plan (OAMP)</p> <p>Outline Construction Traffic Management Plan (OCTMP)</p> <p>Outline Port Construction Traffic Management and Travel Plan (OPTCTMTP)</p> <p>Outline Public Rights of Way Strategy (OPRoWS)</p>	The Applicants welcome this clarification and the OTP submitted at Deadline 8 (document reference 8.9) has been amended to remove the reference to ‘two’
45	<p>Outline Travel Plan</p> <p>Page 7 Para 25 Table 2.1 Introduces the term – Light Vehicles.</p>	The term Light Vehicles and Light Commercial Vehicle (LCV) movements both refer to traffic movements derived from employee demand and are therefore interchangeable. The OTP (document reference 8.11) provides the controls for this mode of transport.



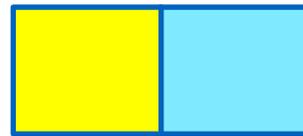
ID	SASES' Comment	Applicants' Comments
	<p>It is noted that the Table 2.1 refers to Light Vehicles, which appears to be employee vehicle movements. The OCTMP covers HGV movements. Where is the corresponding information on Light Commercial Vehicles (LCVs) to be found?</p>	<p>For absolute clarity, the glossary contained in the Deadline 8 OTP (document reference 8.11) has been updated.</p>
46	<p>Outline Travel Plan</p> <p>Page 10 – Table 2.2 General Employee Travel Plan Measures.</p> <p>The is no indication at this point of any intent to adopt measures such as staggered start for different on-site activities normally used to reduce peak traffic .</p>	<p>Table 2.2 of the OTP (document updated at Deadline 8, document reference 8.11) is not an exhaustive list. In introducing the Table 2.2, paragraph 41 clarifies “<i>A final package of measures would be presented in the final TP to be agreed with SCC prior to the commencement of construction</i>”.</p>
47	<p>Outline Code of Construction Practice</p> <p>Page 16 Para 52 Fencing Does the proposed fencing take into account the fact that small groups of deer (Red Deer and Roe Deer) frequently move quite freely across the whole area and may find their normal passage blocked by fencing along the length of the haul road and substation(s) perimeter.</p>	<p>The Applicants note the precise design of both the temporary and permanent fencing must be submitted to and approved by the relevant planning authority prior to commencement of any stage of the onshore works in accordance with Requirement 17 of the draft DCO (updated at Deadline 8, document reference 3.1).</p> <p>The design of both temporary and permanent fencing will consider all species of wildlife to ensure that measures are in place to maintain connectivity within and across the site, whilst ensuring that the safety of the site is paramount whilst not resulting in animals becoming entrapped and/or injured as a result of the installation of the temporary and/or permanent fencing.</p>
48	<p>Outline Access Management Plan</p> <p>Page 2</p> <p>This is first time an OPTCTMP has been revealed.</p> <p>Page 6</p>	<p>The Applicants' provide clarification to each point raised in turn:</p> <p>Page 2</p> <ul style="list-style-type: none"> The Outline Port Construction Traffic Management and Travel Plan was introduced at Deadline 3 (REP3-047) to provide extra assurance of the traffic measures and controls to be introduced when a preferred offshore port base is identified



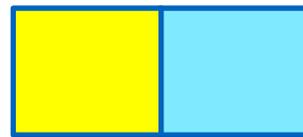
ID	SASES' Comment	Applicants' Comments
	<p>It is noted that the Applicant provides no assurance that Light Commercial Vehicles (ie that category < 7.5 tonnes GLW) will not travel to the site via:</p> <ul style="list-style-type: none"> • the B1121 through Benhall Green. Sternfield or Friston • the B1119 Saxmundham to Leiston • the B1353 Aldringham – Thorpeness <p>Map showing access points and crossing points has been altered.</p> <p>Page 8 Table 2.1 Re: Access 13</p> <p>It is noted that: “ During construction the would only be used for Abnormal Indivisible Load (AIL) deliveries associated with transformers and National Grid employees. This is taken as a firm committment by the Applicant that Access 13 will not be used by HGVs or Light Commercial Vehicles (LGVs).</p> <p>Page 12 Table 2.3 Visibility Requirements</p> <p>It is noted that the visibility requirment at accesses 10 & 13 are at the margins of acceptability</p> <p>It ids noted that no comparable visibility data are supplied for crossings 11/12 (Grove Road) and 3 4 Thorpeness Road. Grove Road has very limited visibility distances.</p> <p>Page 21 Paras 73 &74</p>	<p>Page 6</p> <ul style="list-style-type: none"> • The Applicants' would not preclude LCVs from utilising these routes should the employees journey origin dictate these are the most direct route to onshore access locations (e.g. local based employees served by these routes). A gravity model was developed to inform the likely distribution of employee trips by examining census skill sets and available temporary accommodation. The outputs are contained in Table A26.3 of Appendix 26.2 (APP-528) which indicates very low LCV demand on the routes outlined. <p>Page 8</p> <ul style="list-style-type: none"> • Access 13 will not be used by HGV vehicles during construction phase, it will however, be utilised for LCV employee movements. <p>Page 12</p> <ul style="list-style-type: none"> • Visibility at access 13 complies with Department for Transport standards. The visibility requirement for Accesses 11 and 12 are displayed in Drawing TP-PB4842-DR013 and for Accesses 3 and 4, TP-PB4842-DR007. <p>Page 21</p> <ul style="list-style-type: none"> • The HGV access strategy referenced in paragraphs 73 and 74 has been developed in proportion to the very infrequent HGV movements likely to be generated during operations. • Access is used as a generic term that can refer to either crossing points (providing access from either side of the public highway) or direct access from the public highway. The OAMP Figure 1 (REP6 – 011) clearly details the functionality of each point of access.



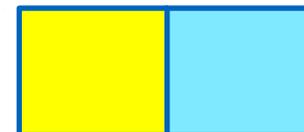
ID	SASES' Comment	Applicants' Comments
	<p>This paragraph details difficulties which would be experienced by an HGV making a left turn from the A1094 to the B1121 a consequence of junction geometry but a right turn is OK. The note is curious as the baseline position is that NO HGVs will travel along any part of the B1121.</p> <p>It is noted that layouts still refer to crossing 11/12, 7/8 and 3/4 as "Access".</p>	
49	<p>Outline Construction Traffic Management Plan</p> <p>Para 54</p> <p>It is noted that the Applicant intends to allow access to the CCSs before 7:00 am ie outside the prescribed working day. This is unacceptable due to the noise that will result.</p> <p>Para 72</p> <p>It is noted that the proposed works involve carriageway widening and vegetation clearance. Reference is made to removal of works post AIL delivery, but no mention of restoration of vegetation</p> <p>Para 84 Theberton Amenity Improvements</p> <p>Permanent footway alterations are planned at Theberton: the rationale for these "improvements" appears weak. Can the Applicant confirm that these changes were requested by SCC (as Highways Authority) or by local residents?</p>	<p>The Applicants' provide clarification to each point raised in turn:</p> <p>Para 54</p> <ul style="list-style-type: none"> The gates would only be open in the event that a HGV arrives before the designated working hours. The offending HGV would be subject to the enforcement provisions set out in the section 4.3 of the OCTMP (REP6-009). <p>Para 72</p> <ul style="list-style-type: none"> The Applicants commit to the restoration of vegetation within the OLEMS (document updated at Deadline 8, document reference 8.7). <p>Para 84</p> <ul style="list-style-type: none"> Theberton footway improvements were proposed by the Applicant to mitigate significant amenity impacts. SCC has approved the concept designs (ExA.SoCG-2.D8.V4).. <p>Para 88</p> <ul style="list-style-type: none"> Snape footway improvements were proposed by the Applicant to mitigate significant amenity impacts. SCC has approved the concept designs (ExA.SoCG-2.D8.V4). <p>Para 107 to 109</p>



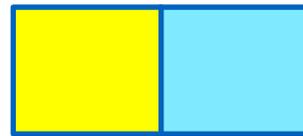
ID	SASES' Comment	Applicants' Comments
	<p>Para 88 Snape Amenity Improvements</p> <p>Permanent footway alterations are planned at the Snape cross roads on the A10194. Given that this is a busy road and any roadworks will give rise to traffic delays, the rationale for these "improvements" appears weak. Can the Applicant confirm that these changes were requested by SCC (as Highways Authority) or by local residents?</p> <p>Para 107 to 109</p> <p>The Applicant has not provided any evidence regarding possible interruptions to utilities. It should be noted that a substantial 3-phase power supply to the Parish Church is buried beneath the road at the intersection of Church Lane and entrance to the Village Hall and nearby properties.</p>	<ul style="list-style-type: none"> Utility protection protocols will be observed in the streetworks permit application process prior to the commencement of works.
50	<p>Clarification Note Sizewell Projects Cumulative Impact Assessment</p> <p>Para 6</p> <p>Notes potential overlap with SZB Relocated Facilities project</p> <p>Para 34 Table 2.4</p> <p>Why has Link 1 (A12 just north of Yoxford been omitted? Is it considered that there are no pedestrians in this area?</p> <p>Para 36 Link 2</p>	<p>The Applicants' provide clarification to each point raised in turn:</p> <p>Para 6</p> <ul style="list-style-type: none"> Noted. <p>Para 34</p> <ul style="list-style-type: none"> Paragraph 24 clarifies the rationale for link screening. <p>Para 36</p> <ul style="list-style-type: none"> This statement is based on the SZC assignment of 80% traffic from the south and 20% from the north. <p>Para 47</p> <ul style="list-style-type: none"> No words have been omitted from paragraph 47.



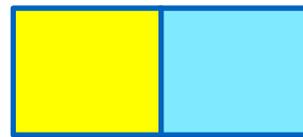
ID	SASES' Comment	Applicants' Comments
	<p>This statement is only true if all SZC traffic approaches from the south</p> <p>Para 47</p> <p>The first sentence is confusing – it may be that some word/words have been left out</p> <p>Para 53 Link 4</p> <p>The Applicant first acknowledges “...that the Projects have potential to result in significant impacts through a high sensitivity section at Theberton...” but then consider that the provision of a few metres of footpath and a dropped kerbcrossing would reduce this to one where “...residual impacts are considered to be not significant” This is an astonishing claim.</p> <p>Para 59 Link 6</p> <p>The Applicant again acknowledges “...that (the Projects) have potential to result in significant impacts through the high sensitivity section of the A1094 ...” (Snape ?) but then considers that the provision of a few metres of footpath and a crossing (dropped kerb?) would reduce this to one where “...residual impacts are considered to be not significant” Again an astonishing claim.</p> <p>Paras 69 to 73</p>	<p>Para 53</p> <ul style="list-style-type: none"> The mitigation proposed at Theberton has been approved by SCC (ExA.SoCG-2.D8.V4) as sufficient to mitigate adverse amenity impacts. <p>Para 59</p> <ul style="list-style-type: none"> The mitigation measures proposed at Snape have been approved by SCC (ExA.SoCG-2.D8.V4) as sufficient to mitigate adverse amenity impacts. <p>Paras 69-73</p> <ul style="list-style-type: none"> Noted. <p>Table 2.6</p> <ul style="list-style-type: none"> The Applicants' application of assessment thresholds by the Guidelines for the Environmental Assessment of Road Traffic (GEART) or other sources is not 'binary' and is complemented by the professional judgement of an experienced trained assessor. <p>Para 79</p> <ul style="list-style-type: none"> A 3% change in traffic would be indiscernible from day to day traffic fluctuations and therefore would not exacerbate baseline road safety conditions and is assessed as negligible. <p>Para 80</p> <ul style="list-style-type: none"> Significant adverse impact is defined as not exacerbating the baseline road safety conditions. <p>Para 89</p> <ul style="list-style-type: none"> The Applicants have no further comments. <p>Para 107</p> <ul style="list-style-type: none"> Junctions 6 to 13 is correct.



ID	SASES' Comment	Applicants' Comments
	<p>Applicant concludes that within the definition of “Severance” in GEART, cumulative impact issues do not result in severance</p> <p>Table 2.6</p> <p>Applicant combines a view of severance taken from two different sources and turns an ‘unlikely’ and slight/moderate/substantial view of traffic flow increment to produce a magnitude assessment of negligible/Low/Medium / high category, and a view that in all cases the test of significance results in a “No”. The convolving of numerical values and ‘attributes’ is mathematically unsound.</p> <p>Para 79 Cluster 1</p> <p>Concludes that although the CIA show an increase of 3% in traffic flow across the A12/B1119 junction the fact that neither of the Projects require a turn at this junction would have a negligible contribution to collisions. This is a nonsequitur.</p> <p>Para 80 Cluster 3</p> <p>SZC assessment that prior to opening the proposed roundabout, there is likely to be a slight increase in collision frequency. Increased SPR based HGV is likely to result in further increase. The Applicant’s assessment cumulative traffic flow would not contribute to a significant adverse effect depends upon the definition in this instance of “significant adverse”</p>	<p>Para 109</p> <ul style="list-style-type: none"> SASES’ reference to “<i>Correct summarisation not checked</i>” is unclear. <p>Para 110</p> <ul style="list-style-type: none"> The Applicants note that SASES has calculated the proportion of the number of cumulative effects for each significance level, however adds that ‘severity’ is not a defined term. <p>Para 126</p> <ul style="list-style-type: none"> The Applicants would clarify that it is proposed to provide measures to mitigate the Projects’ proportional contribution to cumulative impacts at Yoxford (link 2) and Marlesford (link 3). This commitment is contained within the latest OCTMP (document updated at Deadline 8, document reference 8.9)

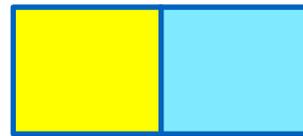


ID	SASES' Comment	Applicants' Comments
	<p>Para 89 – A1094</p> <p>It is noted that a cumulative impact of a 14% increase in traffic results in a “minor adverse cumulative impact” . Again the definition of minor adverse requires careful scrutiny by the ExA.</p> <p>Para 107</p> <p>Should Junction 6 to 13 read Links 6 to 13?</p> <p>Para 109</p> <p>Correct summarisation not checked</p> <p>Para 110 Cumulative Noise</p> <p>It is noted that there is a cumulative impact regarding noise, categorised as “minor” (~70%), “moderate”(22%) or “negligible”(~6%) using Applicant’s definition of severity.</p> <p>Para 126</p> <p>Is the intention to provide pedestrian amenity along links 2 & 3 correct?</p> <p>Link 2 is defined elsewhere as the stretch of A12 between Friday Street and Yoxford?</p> <p>Link 3 is defined as the stretch of A12 south of Friday Street Junction</p>	



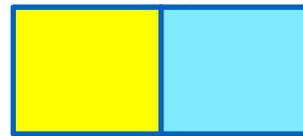
2.5 Applicants' Comments in Response to SASES Comments on D6 dDCO Submissions

ID	SASES' Comment	Applicants' Comments
Comments on Deadline 6 draft DCO Submissions		
1	<p>A number of submissions were made in respect of the draft DCO at deadline 6 including:</p> <ul style="list-style-type: none"> • Applicants' Comments on the ExA's Commentary on the draft DCOs • East Suffolk Council Responses to Examining Authority's Commentary on draft DCOs • National Grid (NGET) Commentary on the dDCO 2. <p>A revised draft of the DCO will be submitted a deadline 7 which no doubt will reflect to some extent the submissions made in those documents and also the submissions made by SASES in respect of the draft DCO.</p> <p>A further issue specific hearing (ISH15) is scheduled to consider the DCO.</p> <p>Accordingly SASES reserves its position in respect of the submissions referred to in paragraph 1 until it has had the opportunity to review the revised draft DCO due at deadline 7.</p>	Noted.

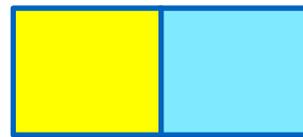


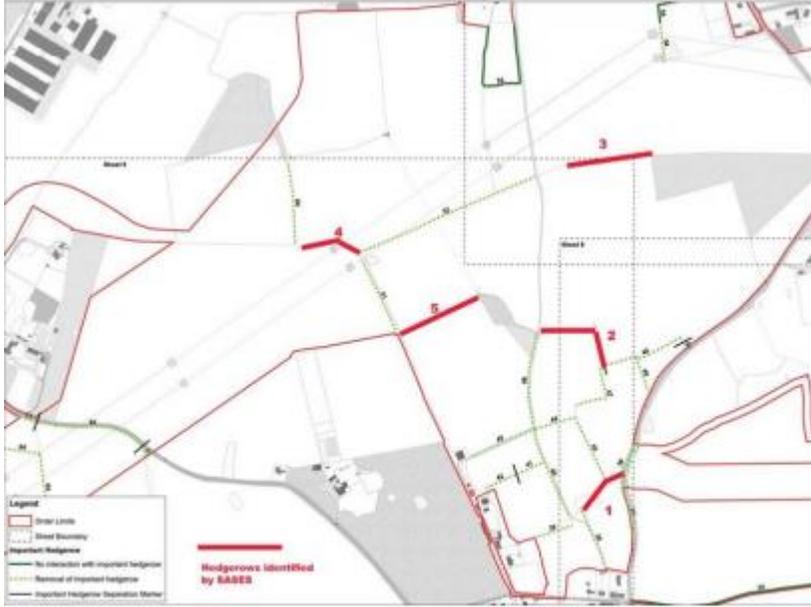
2.6 Applicants' Comments in Response to SASES' Submission in Respect of Hedgerows

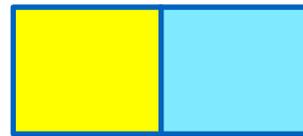
ID	SASES' Comment	Applicants' Comments
1	The Applicants have submitted Important Hedgerows and Tree Preservation Plans (REP3-010). However not all Protected and Important Hedgerows have been identified on these plans.	The Important Hedgerows and Tree Preservation Plan (REP3-010) shows the important hedgerows within the Order limits that may be affected by the Projects. It does not show hedgerows that are not classified as important hedgerows. The Applicants consider that identifying important hedgerows to be removed is appropriate and proportionate. The removal of other hedgerows will be controlled through the approval of the Ecological Management Plan in accordance with Requirement 21 of the draft DCO (document updated at Deadline 8, document reference 3.1).
2	Government guidance on Countryside hedgerows: protection and management can be found here: https://www.gov.uk/guidance/countryside-hedgerows-regulation-andmanagement	Noted.
3	This guidance identifies Protected Hedgerows as having the following characteristics: more than 20m long with gaps of 20m or less in its length; less than 20m long, but meets another hedge at each end.	Noted. This reflects the description of hedgerows to which the Hedgerows Regulations 1997 apply.
4	With regard to location, a hedgerow is protected if it is on or next to: land used for agriculture or forestry; land used for breeding or keeping horses, ponies or donkeys; common land; a village green; a site of special scientific interest; a protected European site; a local or national nature reserve or land belonging to the state. A hedgerow is not protected if it is in, or marks the boundary of, a private garden.	Please see ID3
5	None of the Applicants' Hedgerow Plans refer to Protected Hedgerows, of which there are many throughout this mainly	As is standard in DCOs for nationally significant infrastructure projects, the draft DCO (document updated at Deadline 8, document reference 3.1)



ID	SASES' Comment	Applicants' Comments
	<p>agricultural area. It should be noted that there is an unlimited fine if Protected Hedgerows are removed without consent.</p>	<p>modifies Regulation 6 of the Hedgerows Regulations so that removal of hedgerows to which the Regulations apply is permitted for carrying out development which has been authorised by a DCO. This aligns with the position where development is carried out in accordance with a planning permission.</p> <p>The removal of hedgerows will be controlled through the approval of the Ecological Management Plan in accordance with Requirement 21 of the (document updated at Deadline 8, document reference 3.1).</p>
6	<p>In respect of the substation site shown on Sheet 7 of the Important Hedgerows Plans, there are a number of existing hedgerows, which have not been scheduled for removal but almost certainly will be removed as they fall within the proposed built environment. Map 1 shows these additional hedgerows with referencing photographs which follow.</p>	<p>The Applicants identified the important hedgerows within the Important Hedgerows and Tree Preservation Order Plan (REP3-010) as per the criteria set out in the Hedgerows Regulations 1997. The Applicants consider that identifying important hedgerows to be removed or be crossed by the onshore cable route using a reduced working width is appropriate and proportionate. The removal of other hedgerows will be controlled through the approval of the Ecological Management Plan in accordance with Requirement 21 of the DCO.</p> <p>However, the Applicants would also note that the majority of linear features that SASES identifies as hedgerows were not recorded as such, or were recorded as defunct during the extended Phase 1 habitat surveys undertaken to support the Applications.</p>



ID	SASES' Comment	Applicants' Comments
	 <p><i>Map 1: Hedgerows on Substation Site. Thick red lines show existing from EA1N & EA2 Important Hedgerow Plans.</i></p>	
7	<p>It is also not clear what the intention is with regard to the mature hedgerow on the western boundary of the substation site with Footpath 17. The red line boundary appears to enclose the hedgerow and the hedgerow is therefore at risk.</p>	<p>SASES will have to provide further clarity as it is the Applicants understanding that Footpath 17 is not routed to the west of the onshore substation locations.</p>
8	<p>The Applicants say that there are 67 Important Hedgerows which require removal, however this number of affected hedgerows is significantly understated as no Protected Hedgerows have been identified on the plans. An Important Hedgerow has different</p>	<p>The Applicants consider that identifying important hedgerows to be removed or be crossed by the onshore cable route using a reduced working width is appropriate and proportionate. The removal of other hedgerows will</p>



ID	SASES' Comment	Applicants' Comments
	<p>criteria, as follows: it is at least 30 years old; marks all or part of a parish boundary that existed before 1850; contains an archaeological feature; is in or next to an HER: marks the boundary of an estate that existed before 1600; is part of a field system that existed before 1845; contains protected or endangered species; includes woody species specified in Schedule 1 of the Hedgerow Regulations</p>	<p>be controlled through the approval of the Ecological Management Plan in accordance with Requirement 21 of the DCO.</p> <p>However, the Applicants would point to the Extended Phase 1 Habitat Survey Results (APP-277). Of all the hedgerows recorded within the Order limits, there are very few (less than 10) that are not included on the Important Hedgerows and Tree Preservation Order Plan (REP3-010).</p>
9	<p>Selecting just Important Hedgerows has resulted in Protected Hedgerows being omitted from the DCO. This area of East Suffolk is rich in hedgerows and there will be wholesale destruction along the full length of the cable route and substation site resulting in a dramatic change in character of the area and loss of habitat for wildlife.</p>	<p>The Applicants consider that identifying important hedgerows to be removed or be crossed by the onshore cable route using a reduced working width is appropriate and proportionate. The removal of other hedgerows will be controlled through the approval of the Ecological Management Plan in accordance with Requirement 21 of the DCO.</p>



ID	SASES' Comment	Applicants' Comments
	<p data-bbox="344 328 994 352"><i>Below: Hedgerow 2 looking east – note substantial trees</i></p> 	



ID	SASES' Comment	Applicants' Comments
	 <p data-bbox="344 1043 1061 1075"><i>Above: Hedgerow 2 running west to east. Below: Hedgerow 3</i></p>	



ID	SASES' Comment	Applicants' Comments
		



ID	SASES' Comment	Applicants' Comments
	 <p data-bbox="344 1034 656 1066"><i>Hedgerow 4 (behind pylon)</i></p>	



ID	SASES' Comment	Applicants' Comments
	 <p data-bbox="344 1034 846 1066"><i>Hedgerow 5 (running west from wooded pit)</i></p>	