



**SCOTTISHPOWER
RENEWABLES**

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on Fiona Cramb's Deadline 7 Submission

Applicant: East Anglia TWO and East Anglia ONE North Limited
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Applicable to East Anglia ONE North and East Anglia TWO



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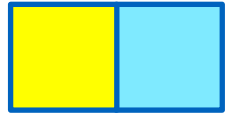


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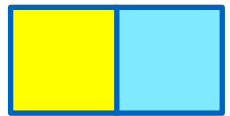
Glossary of Acronyms

ES	Environmental Statement
GIS	Gas Insulated Switchgear
OLMP	Outline Landscape Management Plan



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.
Horizontal directional drilling (HDD)	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.



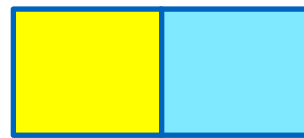
1 Introduction

1. This document presents the Applicants' comments on Fiona Cramb's (FC) Deadline 7 submission (REP7-082).
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 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 Fiona Cramb's Deadline 7 Submissions

ID	Fiona Cramb's Comments	Applicants' Comments
1	<p>1. Further to my deadline 5 submission and the ExA's written questions to the applicants. I write to respond to SPR's answers dated 24th February 2021 in particular in relation to my property which are misleading and inaccurate.</p> <p>2. Generally, I adopt and endorse the submissions of SASES and SEAS and I do not repeat submissions I have made previously.</p> <p>3. In this submission I refer to the Applicant's response to EXA WQ2 Volume 5 and Volume 6.</p>	Noted.
2	<p>4. I would draw to the attention of the ExA the persistent mis-description of my property by SPR. I first pointed this out during the "consultation process" and have done so numerous times since. SPR sometimes describes the property as "Moor Farm". Elsewhere they make observations wrongly assuming that [text redacted] covers the adjacent but different property "Friston Barn". Generally their descriptions are confused and confusing. The fact that there is another Moor Farm which does form part of the examination, adds to the confusion. Originally the whole farm house and barn complex was called Moor Farm. It has not however been called that for over 30 years when it was split into two separate properties. The house, our property, is [text redacted]. The barn is Fristonmoor Barn and is under different ownership. [Text redacted] Fristonmoor Barn and Moor Farm are different properties. "Friston Barn" does not exist.</p>	<p>The Applicants apologise for these errors and for any confusion that has resulted. We agree that the farm was previously known as Moor Farm and it is this name that appears on earlier maps. We also agree that, since the property has been divided, the western half including the farmhouse has been called High House Farm and the eastern half has been called Fristonmoor Barn. Any references by us to 'Friston Barn' is a mistake and should be read as Fristonmoor Barn.</p>



Applicants' Comments on Fiona Cramb's Deadline 7 Submissions

25th March 2021

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	<p>5. In their answers to the written questions posed by the ExA SPR simply repeats the position it has taken in the past and fails to address the issues in the ExA's questions.</p>	
6	<p>6. First, SPR says: "All three development scenarios would have adverse impacts of low magnitude on the significance of [Text redacted] in the historic environment both without or with the proposed landscape mitigation" They also say the developments would not obstruct the views to the Friston Church from "Friston Barn" and any severance of the view to the church from "Friston Barn" due to proposed screening would not materially affect the significance of [Text redacted] as a listed building.</p> <p>7. SPR ignores the fact that development would completely sever the view from High House Farm to the church. When they make a point about this they – bizarrely - refer suddenly to the views from "Friston Barn". But even in relation to Fristonmoor Barn the point is obviously wrong and has no bearing upon the view from [Text redacted] as they are two separate properties. Inspectors have seen the view: "At the ExA site visit it was clear that the garden of HHF provided clear views across a largely open landscape to the church of St Mary Friston".</p>	<p>In discussing the potential for impacts on the significance of High House Farm as a Listed Building, the Applicant considers that the curtilage of the Listed farmhouse includes the gardens of both High House Farm and Fristonmoor Barn. Views from the gardens of both properties are potentially relevant as the issue under consideration at this point is not the residential amenity of High House Farm. The Applicant did not attend the site visit with the Examining Authority (ExA) and, as a result, mistakenly assumed that the ExA was referring to the entirely open views from the garden of Fristonmoor Barn (the most open view south within the curtilage of the Listed Building).</p> <p>Accepting that reference was in fact being made to a view from the southern edge of the garden of High House Farm, the Applicant's analysis does not change. It believes that construction of the proposed substations and sealing end compounds would not obstruct a view of the church but the proposed screening planting would obstruct the view.</p>
8	<p>8. Second, in relation to the placement of the NGET infrastructure, SPRs previous heritage assessment was based upon an assertion that it would be 450m to the South East. Now SPR has had to admit that the garden fence of would be in close proximity to 3 sealing end compounds about 230m away. But despite this admission SPR doggedly sticks to its assessment and conveniently ignores any issue about the NGET infrastructure blocking views or that it would sever any historical connections between High House Farm and the</p>	<p>The distance of 450m cited by the Applicant in the assessment of High House Farm Listed Building (Environmental Statement Appendix 24.7 (APP-519/520) refers to the actual substations, not the sealing end compounds or the re-positioned pylons. It has always recognised that these elements of the projects would be closer to High House Farm and the conclusions reached in the Environmental Statement (ES) were not based on a misunderstanding. Any adverse impact on the significance of High House Farm would be caused by the</p>



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	<p>church. Instead – and once again bizarrely - they refer to “Friston Barn”.</p>	<p>overall change in the character of the surrounding landscape, not on the precise distance between the Listed Building and specific elements of the projects.</p> <p>As previously noted, the Applicants do not consider that the view of the church from the garden makes a substantive contribution to the significance of High House Farm and therefore the severance of the view would not materially affect the significance of this Listed Building.</p>
9	<p>9. Third, in relation to the design of the NGET substation, at deadline 5, I and others raised the issue of the SPR and NGET's failure at this late stage in the examination to make a decision on either Gas or Air Insulation systems for the NGET substation. This decision makes a real difference in term of the impact, specifically because of the variation in height and footprint of the two types of substation.</p> <p>10. In their response to the ExA's question to:</p> <p><i>“consider whether, a commitment should be made to one or other technical solution during the Examination, to enable the selected solution to be secured in the dDCO. If this is not possible, explain why and how the resulting uncertainty can be addressed “</i></p> <p>SPR fails to address this in their answer. The answer of NGET simply prevaricates:</p> <p><i>“ NGET recognises that GIS technologies are evolving and there may be potential options for greener GIS in the future. As such, NGET is keeping the GIS option open to allow for its use in the future if such technologies become available.”</i></p> <p>The illusive nature of the answer means that the EXA should take the worst case scenario for the purposes of analysis. This is</p>	<p>The Gas Insulated Switchgear (GIS) options are still being considered and further visual information have been submitted at Deadline 8 (document reference ExA.AS-28.D8.V1_01- ExA.AS-28.D8.V1_07). GIS visualisations were also included as part of the ES. Reasons why GIS options are still being considered are set out in NGET's response to the ExA written question.</p>



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	<p>because neither SPR nor NGET will or can rule it out as a real possibility.</p> <p>Both SPR and NGET fail to address the ExA's question as to why a commitment cannot be made and secured as part of the dDCO and if this not possible why and how the resulting uncertainty can be addressed. In that case the ExA has no real option but, again, to proceed to evaluate the issue upon the worst case scenario.</p>	
11	<p>11. Fourth, SPR has still failed to provide any map or illustration showing the entire substation complex, including the NGET infrastructure together with all the listed buildings around Fristonmoor, most especially the Church (which SPR seems to have deliberately omitted from its maps). Consequently, the relationship between these properties and the impact of the substations cannot be seen.</p>	<p>A plan showing the location of listed buildings is provided in ES Appendix 24.7 (APP-519 and APP-520). A plan showing the location of the entire substation complex and the plantings proposed as part of the Outline Landscape Management Plan (OLMP) in relation to existing buildings (including the church at Friston) is provided in the current iteration of the OLMP (REP4-015). These plans allow the spatial relationship between the Listed Buildings and proposals to be readily appreciated.</p>
12	<p>12. Fifth, in relation to mitigation SPR proposes an 'additional' planting area close to the south western boundary of [text redacted]. They say that such planting would be adjacent to existing "woodland" planting within the boundary of the property and provides "enclosure". There is no woodland and no enclosure. The Inspectors have seen this area. We have a boundary with a small number of deciduous trees plus a small area of mainly straggly Ash trees some of which have already been removed because of Ash dieback. In any event there are clear views to both to the south where the sealing end compounds will be sited and to the south west.</p>	<p>The new planting area proposed by the Applicants close to the south-western boundary is to provide additional screening of views to the south where the sealing end compounds will be sited. The Applicants accept that the nature / character of the existing property boundary is open to interpretation; it could also be termed a mature vegetated boundary with deciduous trees. The Applicants would expect this to provide some existing screening, which justifies further planting around the boundary.</p>



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14	<p>13. Sixth, with regard to growth rates the ExA is aware that the ESC, SPS and the SASES' expert describe the SPR growth assessments as "optimistic".</p> <p>14. SPR asserts that:</p> <p><i>" the rainfall amounts are likely to provide favourable consecutive growing years provided that short periods of dry weather/lower rainfall are monitored and mitigated by watering provision through the aftercare period "</i></p> <p>15. Anyone who lives in this vicinity knows that the soil is claggy and badly drained. It is generally waterlogged in the winter and rock hard in the summer. SPR supports its case on cultivation with weather data for Ipswich. It does this to suggest that on the Friston soil trees and other proposed planting would thrive. The weather even between Aldeburgh, Snape, Friston and Knodishall is widely variable. The idea that the weather in Ipswich provides a reliable guide to anything on the coast will strike local residents as laughable. Friston routinely experiences very long periods without rain in the period April/May – September. In 2018 there was not a single day with rain here between the end of May and July. Winter can be dry too. We recently experienced three consecutive dry winters . The long and short of it is that the proposed mitigation is intrinsically likely to fail to achieve the growth rates claimed.</p>	<p>The growth rates used in the Applications were determined by a Landscape Architect based on relevant guidance from the Institute of Environmental Management and Assessment, research of published literature and plant nurseries. They are comparable to precedents established by other nationally significant infrastructure projects.</p> <p>Soils at the onshore substation locations tend to be slightly acidic but base-rich loamey and clayey (loam to clayey loam). The soils here are likely to be fertile and conducive to good plant growth. The landscape surrounding the substation locations demonstrates the ability of trees and woodland to establish and grow to maturity in these soils and climate.</p> <p>Section 4.2 of the Outline Landscape and Ecological Management Strategy (and updated version has been submitted at Deadline 8, document reference 8.7) includes proposals for adaptive landscape management measures at Work Nos. 24, 29 and 33 (around the onshore substations and National Grid substation) to assist in promoting the growth of landscape planting.</p> <p>The final Landscape Management Plan will include provision for the implementation of adequate watering of newly planted and established trees during the aftercare period. The Applicants have also committed to the replacement of failed woodland planting at the onshore substation location and at Work Nos. 24, 29 and 33 for a period of ten years.</p>