



SCOTTISHPOWER
RENEWABLES

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Statement of Common Ground

Substation Action Save East Suffolk

Applicants: East Anglia ONE North Limited and East Anglia TWO Limited
Document Reference: ExA.SoCG-38.D9.V2
SPR Reference: EA1N_EA2-DWF-ENV-REP-IBR-00109

Date: 15th April 2021
Revision: Version 02
Author: Royal HaskoningDHV

Applicable to **East Anglia ONE North** and **East Anglia TWO**



Revision Summary				
Rev	Date	Prepared by	Checked by	Approved by
01	13/01/2021	Paolo Pizzolla	Ian MacKay / Lesley Jamieson	Rich Morris
02	15/04/2021	Paolo Pizzolla	Ian MacKay / Lesley Jamieson	Rich Morris

Description of Revisions			
Rev	Page	Section	Description
01	n/a	n/a	First draft for Deadline 4 Submission
02	n/a	n/a	Final for submission to the Examining Authority at Deadline 9



Table of Contents

1	Introduction	1
1.1	Background	1
1.2	The Development	2
1.3	Summary of Agreed, Not Agreed and Outstanding Matters	3
2	Statement of Common Ground	4
2.1	Historic Environment	5
2.2	Landscape and Visual	16
2.3	Flood Risk	24
2.4	Construction and Operational Noise	38
3	Signatures	45



Glossary of Acronyms

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



Glossary of Terminology

Applicant	East Anglia TWO Limited / East Anglia ONE North Limited
Development area	The area comprising the onshore development area and the offshore development area (described as the 'order limits' within the Development Consent Order).
East Anglia TWO / ONE North project	The proposed project consisting of up to 75 (East Anglia TWO) or 67 (East Anglia ONE North) wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO / ONE North windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
Mitigation areas	Areas captured within the onshore development area specifically for mitigating expected or anticipated impacts.
National electricity grid	The high voltage electricity transmission network in England and Wales owned and maintained by National Grid Electricity Transmission
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order but will be National Grid owned assets.
National Grid overhead line realignment works	Works required to upgrade the existing electricity pylons and overhead lines (including cable sealing end compounds and cable sealing end (with circuit breaker) compound) to transport electricity from the National Grid substation to the national electricity grid.
National Grid overhead line realignment works area	The proposed area for National Grid overhead line realignment works.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.
National Grid substation location	The proposed location of the National Grid substation.
Offshore development area	The East Anglia TWO / East Anglia ONE North windfarm site and offshore cable corridor (up to Mean High Water Springs).
Onshore cable corridor	The corridor within which the onshore cable route will be located.
Onshore cable route	This is the construction swathe within the onshore cable corridor which would contain onshore cables as well as temporary ground required for construction which includes cable trenches, haul road and spoil storage areas.



Onshore cables	The cables which would bring electricity from landfall to the onshore substation. The onshore cable is comprised of up to six power cables (which may be laid directly within a trench, or laid in cable ducts or protective covers), up to two fibre optic cables and up to two distributed temperature sensing cables.
Onshore development area	The area in which the landfall, onshore cable corridor, onshore substation, landscaping and ecological mitigation areas, temporary construction facilities (such as access roads and construction consolidation sites), and the National Grid Infrastructure will be located.
Onshore infrastructure	The combined name for all of the onshore infrastructure associated with the proposed East Anglia TWO / East Anglia ONE North project from landfall to the connection to the national electricity grid.
Onshore preparation works	Activities to be undertaken prior to formal commencement of onshore construction such as pre-planting of landscaping works, archaeological investigations, environmental and engineering surveys, diversion and laying of services, and highway alterations.
Onshore substation	The East Anglia TWO / East Anglia ONE North substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure.
Onshore substation location	The proposed location of the onshore substation for the proposed East Anglia TWO / East Anglia ONE North project.



1 Introduction

1.1 Background

1. This Statement of Common Ground (SoCG) has been prepared by East Anglia TWO Limited, East Anglia ONE North Limited (the Applicants) and Substation Action Save East Suffolk (SASES) in relation to the East Anglia TWO project and the East Anglia ONE North project (the Projects). It identifies areas of the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications (the Applications) where matters are agreed or not agreed between the parties.
2. The Applicants have had regard to the guidance for the examination of applications for development consent (Department for Communities and Local Government 2015) when compiling this SoCG.
3. In Procedural Decision 15 contained in Annex F of the Rule 6 Letter (PD-013), the Examining Authority requested that the Applicants enter into a SoCG with SASES on the following topics:
 - Access, highways and transportation;
 - Other Consequential Onshore Effects (defined as economic and tourism effects in Annex G of Procedural Decision 7 (PD-006));
 - Historic environment;
 - Recreational use of the foreshore;
 - Landscape and visual;
 - Flood risk;
 - Construction and operational noise; and
 - Air quality.
4. At the Preliminary Meeting (Part 1) on 16th September 2020, Mr Richard Turney, on behalf of SASES, advised that SASES wish to enter into a SoCG covering the following topics only:
 - Historic environment;
 - Landscape and visual;
 - Flood risk; and
 - Noise.



5. This SoCG therefore only covers those topics specified by SASES at the Preliminary Meeting (Part 1). Topic specific matters agreed, not agreed and actions to resolve matters between the Applicants and SASES are included within this SoCG.
6. The tables presented below represent the SoCG with the Applicants and SASES in respect of the topics listed above.
7. This document is applicable to both the East Anglia TWO and East Anglia ONE North DCO Applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23rd December 2019 (PD-004). Whilst this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it for the other project submission.

1.2 The Development

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



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

1.3 Summary of Agreed, Not Agreed and Outstanding Matters

11. **Table 1** provides a summary of the matters agreed or not agreed and between the Applicants and SASES for each of the relevant SoCG topic areas.

Table 1 Summary of Agreed, Not Agreed and Outstanding Matters

Topic	Agreed, Disagreed or Outstanding
Historic environment	Matters relating to the Existing Environment and Assessment Methodology have been agreed. Matters relating to the Assessment Conclusions and Mitigation remain not agreed.
Landscape and visual	Matters relating to the Existing Environment, Assessment Methodology, Assessment Conclusions and Mitigation remain not agreed.
Flood risk	Matters relating to the Existing Environment, Assessment Methodology, Assessment Conclusions and Mitigation remain not agreed.
Construction and operational noise	Matters relating to the Existing Environment, Assessment Methodology, Assessment Conclusions and Mitigation remain not agreed.



2 Statement of Common Ground

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

Table 2 Summary of Consultation with SASES

Date	Contact Type	Topic
18 th July 2018	Meeting	Meeting with Friston Working Group
10 th December 2018	Meeting	Project Update Meeting
12 th July 2019	Workshop	Friston Community Workshop
28 th August 2020	Letter	Letter of intent to enter into SoCG issued
9 th September 2020	Letter	Reply to Letter intent received from SASES
25 th September 2020	Email	SoCG templates issued to SASES
26 th November 2020	Email	Populated SoCG templates received from SASES
11 th January 2021	Email	Email issued to SASES with reply to points raised in the SoCG and requesting confirmation that the document can be submitted at Deadline 4.
12 th January 2021	Email	Confirmation received from SASES that SoCG can be submitted at Deadline 4.
4 th March 2021	Email	Email requesting further revision to SoCG following new material being submitted into examination.
19 th March 2021	Email	Revised SoCG received from SASES.
1 st April 2021	Email	Final SoCG issued to SASES for sign off.



2.1 Historic Environment

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

Table 3 Historic Environment

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
Environmental Impact Assessment						
SASES-301	Existing Environment	Sufficient survey data has been collected to inform the assessment.	Agreed	Agreed	Agreed	<p><u>SASES Comments</u></p> <p>Onshore Archaeology: The desk-based assessment is adequate, but the coverage of the geophysical survey is not complete and there is a need for trial-trenching to confirm the result of the geophysics and evaluate the areas which could not be surveyed. SASES defer to Suffolk County Council as the lead authority on this issue.</p> <p>Cultural Heritage: The baseline desk-based assessment is adequate, although several significant features, including the parish / hundred boundary to the north of the church have been overlooked.</p> <p><u>Applicants' Response</u></p> <p>Onshore Archaeology: The Applicants note that East Suffolk Council (ESC) and Suffolk County Council (SCC) (the Councils) have agreed that sufficient non-intrusive survey data has been collected to inform the assessment (see LA-06.02 of REP1-072). SCC has approved the scope of works to reach agreement regarding the sufficiency of intrusive survey data (see LA-06.05 (document reference ExA.SoCG-2.D8.V4)).</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>REP1-025 – REP1-033 provide information on the geophysical surveys, trial trenching and earthworks carried out to inform further stages of post-consent survey; the Applicants consider these to be adequate for the purposes of the EIA.</p> <p>It is the view of the Applicants that the commitment to 5% sampling of the onshore development area (being progressed with ongoing consultation with the Councils), will provide sufficient intrusive survey data. Further information on the preliminary trial trenching surveys can be found in the following documents submitted at Deadline 1:</p> <ul style="list-style-type: none"> • Pre-Construction Trial Trenching Report (REP1-023); • Onshore Archaeology Geophysical Survey Reports 1-9 (REP1-025 – REP1-033); and • Onshore Archaeology Earthworks Report (REP1-034) <p>Further trial trenching at strategic locations will be undertaken in 2021, as agreed with SCC (see LA-06.05 (document reference ExA.SocG-2.D8.V4)).</p> <p>Cultural Heritage: The EIA desk based study, Appendix 24.3 - Onshore Archaeology and Cultural Heritage Desk Based Assessment and Annexes (APP-514), identified heritage features (including the parish / hundred boundary to the north of the church) and further information regarding these heritage features is presented within the Onshore Archaeology and Cultural Heritage Clarification Note</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>submitted at Deadline 1 (REP1-021). The Applicants note that some matters remain under discussion with the Councils (LA-07.01 of REP1-072).</p> <p><u>SASES Updated Position at Deadline 8</u></p> <p>Onshore Archaeology: SASES welcome the additional survey and evaluation work which has been undertaken during the DCO process, leading to a much greater understanding of the onshore archaeological resource. SASES continue to defer to Suffolk County Council as the lead authority on this issue.</p> <p>Cultural Heritage: SASES also welcome the additional assessments presented in the Heritage Assessment Addendum and associated appendices and would now agree with the position that sufficient survey data have been collected to inform the assessment.</p> <p><u>Applicants' Response</u></p> <p>The Applicants welcome SASES agree in respect of this statement.</p>
SASES-302	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project.	Agreed	Agreed	Agreed	<p><u>SASES Comments</u></p> <p>The stated approaches to be taken are adequate, but see further comments below on their application, which results in an underestimation of the impact on cultural heritage.</p> <p><u>Applicants' Response</u></p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>The Applicants welcome SASES' agreement on this matter and note that this is also agreed with the Councils (LA-06.08 and LA-07.03 of REP1-072). The Applicants have provided notes in response to SASES' further comments at the appropriate IDs.</p> <p><u>SASES Updated Position at Deadline 8</u></p> <p>No change.</p>
SASES-303	Assessment Methodology	The worst case scenario presented in the assessment is appropriate.	Agreed	Agreed	Agreed	<p>None.</p> <p><u>SASES Updated Position at Deadline 8</u></p> <p>No change.</p>
SASES-304	Assessment Conclusions	The ES adequately characterises the baseline environment in terms of archaeology and cultural heritage.	Agreed	Agreed	Agreed	<p><u>SASES Comments</u></p> <p>Onshore Archaeology: Without the baseline geophysical survey data and trial trenching referred to above, the baseline archaeological character of the environment cannot be adequately characterised.</p> <p>Cultural Heritage: The desk-based elements of the project provide an adequate characterisation of the baseline environment, although some features, such as the parish/hundredal boundary, are overlooked.</p> <p><u>Applicants' Response</u></p> <p>Onshore Archaeology: See notes for SASES-301.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>Cultural Heritage: The EIA desk based study, Appendix 24.3 - Onshore Archaeology and Cultural Heritage Desk Based Assessment and Annexes (APP-514), identified heritage features (including the parish / hundred boundary to the north of the church) and further information regarding these heritage features is presented within the Onshore Archaeology and Cultural Heritage Clarification Note submitted at Deadline 1 (REP1-021).</p> <p><u>SASES Updated Position at Deadline 8</u></p> <p>Onshore Archaeology: SASES welcome the additional survey and evaluation work which has been undertaken during the DCO process, which helps to characterise the baseline environment in terms of archaeology. SASES continue to defer to Suffolk County Council as the lead authority on this issue.</p> <p>Cultural Heritage: SASES also welcome the additional assessments presented in the Heritage Assessment Addendum and associated appendices and would now agree with the position that the desk-based elements of the project provide project an adequate characterisation of the baseline environment.</p> <p><u>Applicants' Response</u></p> <p>The Applicants welcome SASES agree in respect of this statement.</p>
SASES-305	Assessment Conclusions	The assessment of impacts for	Agreed	Agreed	Not Agreed	<u>SASES Comments</u>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
		<p>construction, operation and decommissioning presented are consistent with the agreed assessment methodologies.</p>				<p>Onshore Archaeology: Without the baseline survey data referred to above, the impact of the scheme on buried archaeology cannot be adequately assessed.</p> <p>Cultural Heritage: The impact assessment is limited to the operational phase of the project and does not consider the impacts of the construction or phases on cultural heritage. Scoping these phases out of consideration is not considered to be appropriate.</p> <p>The impact assessment focusses primarily on designated heritage assets, with little or no consideration given to non-designated heritage assets.</p> <p>The approach taken to impact on the setting of heritage assets is primarily visual, rather than experiential, and fails to address the impacts of noise, vibration, change in landscape character, severance, etc. Setting tends only to be defined in terms of physical distances and there is a strong emphasis on public viewpoints, which is incorrect.</p> <p><u>Applicants' Response</u></p> <p>Onshore Archaeology: See notes for SASES-301.</p> <p>Cultural Heritage: The 'scoping out' of construction works was discussed and agreed with the Expert Topic Group (ETG) and was agreed with Historic England through the SoCG process (REP1-059). The Applicants note that this statement has been agreed with the Councils (see LA-07.07 of REP1-072). The Councils have also agreed the following statement at LA-07.05 (REP1-072): <i>"The approach to</i></p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p><i>scoping out construction phase impacts upon the setting of heritage assets from further, more detailed assessment is appropriate”.</i></p> <p>Construction works that would result in material permanent change in the setting of heritage assets have been considered in the assessment of operational impacts (See ID 26 of <i>Applicants’ Comments on SASES’ Deadline 1 Submissions</i>, submitted at Deadline 3 (document reference REP3-072) for further detail.</p> <p><u>SASES Updated Position at Deadline 8</u></p> <p>Onshore Archaeology: SASES welcome the additional survey and evaluation work which has been undertaken during the DCO process, which now allows the likely impact of the scheme on buried archaeology to be adequately assessed. SASES continue to defer to Suffolk County Council as the lead authority on this issue.</p> <p>Cultural Heritage: SASES also welcome the additional assessments presented in the Heritage Assessment Addendum and associated appendices, but our position on cultural heritage matters remains unchanged. The impacts of construction and decommissioning have not been assessed, and do not support their being scoped out of the assessment. We are particularly concerned that, despite all of the discussion and evidence on the matter to date, the applicants’ assessment of the heritage impact on the church is still considerably lower than that identified by all other parties.</p> <p><u>Applicants’ Response</u></p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						The Applicants position is set out within the Heritage Assessment Addendum submitted at Deadline 4 (REP4-006).
SASES-306	Assessment Conclusions	The assessment of cumulative impacts is consistent with the agreed methodologies.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The consideration of the potential impacts of the operational phases of EA1N and/or EA2 schemes are adequately considered. The construction and decommissioning phases are not (see above comments).</p> <p>There is no consideration of the potential impacts of other offshore energy infrastructure projects which may result in additional development at Friston. Such schemes potentially include the National Grid Ventures projects Nautilus and Eurolink, the Five Estuaries windfarm project, the North Falls windfarm project and the National Grid SCD1 and SCD2 projects.</p> <p><u>Applicants' Response</u></p> <p>See notes for SASES-305. Paragraph 13 of the SoCG with the Councils (document reference ExA.SoCG-2.D8.V4) sets out the Applicants' position with regard to cumulative impact assessment and the other energy infrastructure projects listed.</p> <p><u>SASES Updated Position at Deadline 8</u></p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>Our position remains unchanged on this issue, and we do not consider that the issue of cumulative impact with other offshore energy infrastructure projects has been assessed adequately.</p> <p><u>Applicants' Response</u></p> <p>The Applicants' position remains as that set out within Paragraph 13 of the SoCG with the Councils submitted at Deadline 8 (document reference ExA.SoCG-2.D8.V4).</p>
SASES-307	Mitigation	The embedded, initial informative and additional mitigation proposed within section 24.3.3 of the ES are appropriate.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The submitted documents demonstrate that the mitigation measures put forward in the proposed Outline Landscape Mitigation Plan effectively do nothing to reduce the heritage impacts of the scheme in any meaningful way. In six of the seven instances where harm is identified to designated heritage assets, the applicant acknowledges that the proposed mitigation planting will be of such negligible effect that even after 15 years it will not have had sufficient effect to reduce the assessment of harm caused to any of the heritage assets. The proposed mitigation scheme is not fit for purpose and will not reduce the heritage harm.</p> <p><u>Applicants' Response</u></p> <p>The Applicants refer to the notes at LA-07.12 within the SoCG with the Councils regarding mitigation (REP1-072). Since submission of the Applications the Applicants have made a number of design changes to</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>the onshore substations. An updated Outline Landscape Management Plan was submitted at Deadline 3 (within the Outline Landscape and Ecological Management Strategy (OLEMS) (REP3-030) along with a selection of updated visualisations within the Updated Photomontages Clarification Note (document reference ExA.AS-16.D3.V1). Further updates and detail will be submitted at Deadline 4. The Applicants disagree with SASES' comment regarding the mitigation planting being unfit for purpose. It is the Applicants' view that the mitigation planting proposals presented in the OLEMS have been designed to be historically appropriate and would reduce the effects,</p> <p><u>SASES Updated Position at Deadline 8</u></p> <p>SASES welcome the additional work which has been undertaken on the design of the Outline Landscape Management Plan, but our position that the proposed mitigation plan does nothing to reduce the heritage impacts of the scheme in any meaningful way remains unchanged. The current proposed mitigation scheme is not fit for purpose and will not reduce the heritage harm.</p> <p><u>Applicant's Response</u></p> <p>The Applicants note that in mitigating LVIA effects through landscape planting this is not considered to fully mitigate the effects of the Projects on heritage setting and the historic landscape character. However, the Applicants maintain that the Outline Landscape Management Plan has had regard to historic character and heritage setting. It will re-establish a historic right of way and will also seek to reinforce hedgerows and field</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>boundaries. The onshore substations will be located on agricultural land which has undergone significant change since the 1950s. The setting of certain heritage assets is already influenced by the existing 400kV overhead line. This is particularly noted in respect of assets located to the north and west of the onshore substation locations.</p>



2.2 Landscape and Visual

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

Table 4 Landscape and Visual

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



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



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>29.2 LVIA Methodology) could range from a moderate to a major impact.</p> <p><u>Applicants' Response</u></p> <p>The matrix presented in Table 29.5 of the ES (APP-077) acts as a tool to aid assessment decisions. The assessment methodology used for the LVIA follows Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) (Landscape Institute and Institute for Environmental Management and Assessment, 2013). GLVIA3 states that <i>“the regulations require that a judgement is made about whether or not each effect is significant”</i>, and that <i>“there are no hard and fast rules about what effects should be deemed significant, but LVIAs should always distinguish clearly between what are considered to be the significant and non-significant effects”</i>. GLVIA3 further notes that <i>“it is not essential to establish a series of thresholds for different levels of significance...provided it is made clear whether or not they are considered significant”</i>.</p> <p>More detail has been provided within the Applicants' Comments on SASES' Deadline 1 Submissions submitted at Deadline 4 (REP4-023).</p> <p>The Applicants note that this same statement has been agreed by the Councils (see LA-13.03 (document reference ExA.SoCG-2.D8.V4)).</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
SASES-503	Assessment Methodology	The worst case scenario presented in the assessment is appropriate.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The assessment has not taken full account of the additional harm that would result if the SPR substations were built consecutively which could take at least 6 years assuming the National Grid connection hub works are conducted in the same period.</p> <p>The assessment has not taken full account of the delay to the post construction mitigation planting (which represents the bulk of the mitigation planting) if the SPR substations were constructed consecutively.</p> <p>The assessment has not considered the cumulative effects of other developments which may come forward in association with National Grid infrastructure at Friston.</p> <p><u>Applicants' Response</u></p> <p>The Applicants note that the equivalent statement has been agreed by the Councils (see LA-13.05 (document reference ExA.SoCG-2.D8.V4)). The Applicants believe that the assessment of cumulative effects presented within Appendix 29.5 of the ES (APP-569) fully considers the sequencing of works between the Projects. Paragraph 13 of the SoCG with the Councils (document reference ExA.SoCG-2.D8.V4) sets out the Applicants' position with regard to cumulative impact assessment and a number of other energy projects.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
SASES-504	Assessment Conclusions	The ES adequately characterises the baseline environment in terms of landscape and visual amenity.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>Insufficient weight has been given to the amenity value of marinating the integrity of the public right of way (PRoW) network to the north of the village.</p> <p><u>Applicants' Response</u></p> <p>See notes for SASES-501. This matter remains not agreed with the Councils (See LA-13.07 (document reference ExA.SoCG-2.D8.V4)). The Applicants note that further measures regarding PRoW were included in the updated <i>Outline PRoW Strategy</i> (document reference 8.4) submitted at Deadline 3.</p>
SASES-505	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>For the reasons given above.</p> <p>In addition, the assumed growth rates for the mitigation planting are considered to be unrealistic (See report from Jon Rose- REP1-365) and therefore the assumptions about how long it will be before the mitigation planting is effective in screening are also unrealistic.</p> <p><u>Applicants' Response</u></p> <p>The Applicants note that the matter of planting growth rates has been agreed with the Councils subject to the effective and robust implementation of the adaptive management scheme as set out within the <i>OLEMS</i> (document reference 8.7). The Applicants refer to</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						statements LA-13.11, LA-13.15, LA-13.16 and LA-13.26 within the SoCG with the Councils (document reference ExA.SoCG-2.D8.V4)).
SASES-506	Assessment Conclusions	The assessment of cumulative impacts s consistent with the agreed methodologies.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The cumulative effects of other developments which will come forward in association with National Grid infrastructure at Friston have not been considered. In particular the projects with actual or likely connection offers to the National Grid substation proposed at Friston should be considered namely Nautilus, Eurolink, North Falls, Five Estuaries, SCD1 and SCD2.</p> <p><u>Applicants' Response</u></p> <p>Paragraph 13 of the SoCG with the Councils (document reference ExA.SoCG-2.D8.V4) sets out the Applicants' position with regard to cumulative impact assessment and a number of other energy projects. Consideration of cumulative landscape and visual effects relating to possible future extensions of the National Grid substation has been provided within the <i>Extension of National Grid Substation Appraisal</i> submitted at Deadline 8 (document reference ExA.AS-32.D8.V1), which notes that, since Deadline 6, it has been confirmed by both the proposed North Falls and Five Estuaries projects that they will not connect to the National Grid near Leiston.</p>
SASES-507	Mitigation	The embedded mitigation set out within	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
		<p>section 28.3.3 and section 28.3.4 of the ES is appropriate and sufficient.</p>				<p>The LVIA accepts that even with the additional mitigation proposed the effects will remain at moderate/major adverse for the lifetime of the substations.</p> <p>The reduction in the footprint of the substations , the lowering of the finished ground levels at the locations of the eastern onshore substations and the reduction in height of some of the buildings/equipment within the substations is an improvement however further mitigation might be achieved if:</p> <ul style="list-style-type: none"> • It was agreed that the construction of both SPR substations and the NG substation was undertaken concurrently; • Consideration was given to consolidating some of the elements to achieve a smaller footprint; • Priority was given to mitigating the impact on Friston village, even if this might move the substations closer to Grove Road; • An enhancement programme was prepared which looked at improving the wider landscape rather than merely hiding views of the substations. • An intensive and continuous maintenance (including irrigation) with regard to mitigation planting as recommended by an independent arboriculturalist familiar with the local environment. <p><u>Applicants' Response</u></p> <p>At Deadline 3 the Applicants submitted an Onshore Substations Update Clarification Note (REP3-057) which outlined a number design</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>changes to the onshore and National Grid substations and the environmental benefits of these changes. These include:</p> <ul style="list-style-type: none"> • Reduction in the footprint of each of the onshore substations and their resulting relocation (as summarised in the Project Update Note (REP2-007) submitted at Deadline 2); • Lowering of the finished ground levels at the locations of the eastern onshore substations and National Grid substation (as summarised in the Deadline 3 Project Update Note (REP3-052); and • Reduction in the maximum heights of the buildings and external equipment at both onshore substations (as summarised in the Deadline 3 Project Update Note (REP3-052). <p>An updated Outline Landscape Management Plan was submitted at Deadline 4 (REP4-015) along with a LVIA Addendum (REP4-031) and selection of updated visualisations (REP-32 to REP4-039). The updated OLEMS (document reference 8.7) includes an adaptive aftercare period with commitments regarding irrigation. Further updates and detail are provided within the Substations Design Principles Statement submitted at Deadline 8 (document reference ExA.AS-4.D8.V2).</p>



2.3 Flood Risk

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

Table 5 Flood Risk

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
Environmental Impact Assessment						
SASES-601	Existing Environment	Sufficient survey data has been collected to inform the assessment.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The Applicant has failed to undertake a detailed survey of the upper watershed or village drainage flow routes and field drains, nor sample mobilised sediment or undertake infiltration testing.</p> <p><u>Applicants' Response</u></p> <p>The Applicants note that this same statement is agreed with the Councils (the Lead Local Flood Authority (LLFA)) (see LA-05.05 (document reference ExA.SoCG-2.D8.V4)). The Applicants have committed to undertaking percolation tests post consent at detailed design. This is described in section 4.2 of the Outline Operational Drainage Management Plan (document reference ExA.AS-3.D8.V4) submitted at Deadline 8. The Applicants have drawn on the relevant findings of the catchment model undertaken by British Maritime Technology on behalf of SCC in 2020 to inform the Outline Operational Drainage Management Plan (see section 3.6.1.2).</p> <p><u>SASES Updated Position at Deadline 8</u></p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>The Applicant has made no further attempt to characterise the watershed upstream of Friston Village. They have not considered the effect of existing field depressions on pre-development run-off and infiltration, they have not undertaken any surveying of the land drains, overland flow pathways or flow channels/ditches, and they have undertaken no assessment whatsoever of the receptors in the village exposed to the flood risk. They have undertaken no stream flow measurement or monitoring, no rainfall monitoring and no sediment loading sampling. They are not able to reliably determine the pre-development run-off rates leaving the site, nor those entering the village, nor those creating flood risk in the village,</p> <p>The LLFA position as articulated in ISH11 is that the surveying to inform the assessment is inadequate. SASES agree with this statement from the LLFA.</p> <p>SASES maintains its position of NOT AGREED.</p> <p><u>Applicants' Response</u></p> <p>The Applicant does not accept that the above comment accurately reflects the information which is available, and which has informed the Applicants assessment. The Applicants have confirmed that there will be no increase in the pre-development greenfield runoff rate and the implementation of the SuDS measures would not increase the flood risk downstream of the substation sites. The above works would form part of the detailed design of the surface water management system.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						An updated Outline Operational Drainage Management Plan has been submitted at Deadline 8 (document reference ExA.AS-3.D8.V4), along with a Flood Risk and Drainage Clarification Note (document reference ExA.AS-13.D8.V1), which provide further controls and information regarding this matter. Further detail has also been provided in the Outline Code of Construction Practice (CoCP) submitted at Deadline 8 (document reference 8.1).
SASES-602	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>There is inadequate assessment of the pluvial run-off flood risk posed to Friston village by both the permanent works and the construction phase of the project.</p> <p>This has resulted in site selection in an area suffering from on-going pluvial flood risk. The site selection methodology is flawed.</p> <p>The Applicant needs to reduce both PEAK flows and TOTAL flows to pre-development flows, not just PEAK flows.</p> <p>There needs to be detailed hydraulic modelling undertaken of baseline scenarios, sufficient detailed water management design to inform the impact modelling and demonstration that the mitigation measures are viable, manageable, effective and safe to the Village.</p> <p><u>Applicants' Response</u></p> <p>The Applicants refer to Row 18, <i>Table 2.1</i> of the <i>Applicants' Comments on SASES' Deadline 1 Submissions</i> submitted to the Examination at</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>Deadline 3 (document reference ExA.AS-20.D3.V1) where this matter is discussed in greater detail.</p> <p><u>SASES Updated Position at Deadline 8</u></p> <p>SASES acknowledges the Applicant has in ISH11 finally considered Peak and Total Flows during the Operational Phase. However the Applicant uses a methodology for the Total Flows assuming i) an accurate understanding of the baseline pre-development flows, which they do not have and ii) QBAR flows will not cause flooding in Friston – whereas Friston is routinely flooded every 1 to 2 years and the roads are inundated multiple times each year. This QBAR approach is inaccurate and inadequate given the on-going frequent flood risk to Friston. There is no characterisation of the watershed, no hydraulic modelling, no monitoring. There remains no assessment of the receptors at risk of flooding in the village nor their vulnerability or exposure.</p> <p>In addition to the above, the Applicant provides no attempt whatsoever to estimate flood risk associated with the Construction Phase, and no evidence of any design or demonstration of the viability of any surface water management or flood risk mitigation measures.</p> <p>SASES maintains its position of NOT AGREED.</p> <p><u>Applicants' Response</u></p> <p>Construction risk has been considered by the Applicants and appropriate measures can be phased to match construction activity.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>This is stated within the updated Outline CoCP submitted at Deadline 8 (document reference 8.1).</p> <p>The BMT Report (2020) identifies the likely flow routes contributing to flooding in Friston. As shown from analysis of the results data within the BMT Report (2020), the onshore development area contributes limited flows into Friston. The final SuDS design will ensure appropriate management of the conveyance of surface water associated with these flow paths. The details of the final SuDS scheme will be confirmed once a hydraulic model has been produced during detailed design. The Projects will not lead to increased flood risk in Friston and afford opportunities to manage any contribution that the onshore development area makes to the existing issues.</p>
SASES-603	Assessment Methodology	The worst case scenario presented in the assessment is appropriate.	Agreed	Agreed	Not Agreed	<p>SASES Comments</p> <p>The pluvial flood risk has been inadequately assessed so therefore so has the worst case scenario.</p> <p>The Climate change allowance for rainfall should be 40% - as per the SCC requirement.</p> <p>The worst case scenario should be considered separately for construction phase and permanent works.</p> <p>The worst case needs to consider the catastrophic failure of any above ground attenuation ponds and their impact on the village.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p><u>Applicants' Response</u></p> <p>The SCC design principles and climate change allowance of 40% is listed in <i>section 2.2.5</i> of the <i>Outline Operational Drainage Plan</i> (REP3-046). This has been incorporated into the indicative SuDS design. As described in <i>section 4.2</i>, at detailed design a further sensitivity check will be carried out for a 1 in 100 year storm event with a 40% allowance for climate change to ensure there is no off-site flooding for this storm event.</p> <p><u>SASES Updated Position at Deadline 8</u></p> <p>SASES acknowledges the Applicant has now included a 40% allowance for climate change in its calculations for the Operational Phase in the latest version of the OODMP. However the Applicant has not undertaken a robust assessment of the baseline hydrology of the watershed and is therefore over-estimating the QBAR and thus overestimating the flows it can release from the site, thus undersizing the required storage on the site, as well as underestimating the size of the flows that actually cause flooding in Friston. The Applicant has therefore not proven the worst case scenario.</p> <p>The Applicant has not considered exceedance scenarios, blockage scenarios, clogging scenarios, has allowed negligible under-design allowances, and created attenuation structure designs which in the worst case scenario could hold volumes requiring Reservoir Act engineering whilst relying on landscape non-engineering regulation. There is no consideration of overtopping risks, no consideration of</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>retention bund failure nor inundation risk to the village immediately beneath the structures.</p> <p>In addition, the Applicant has failed to assess the Construction Phase in its entirety.</p> <p>SASES maintains its position of NOT AGREED.</p> <p><u>Applicants' Response</u></p> <p>The Applicants have responded at Deadline 8 to these matters in the <i>Flood Risk and Drainage Clarification Note</i> (document reference EXA.AS-13.D8.V1) and the <i>Outline Operational Drainage Management Plan</i> (document reference EXA.AS-3.D8-V4).</p>
SASES-604	Assessment Conclusions	The ES adequately characterises the baseline environment in terms of flood risk.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The ES has fundamentally failed to adequately assess the pluvial flood risk posed to Friston Village – with inadequate surveying and inadequate methodology.</p> <p><u>Applicants' Response</u></p> <p>The Applicants note that this statement has been agreed by the Councils (see LA-05.03 of REP1-072). The Applicants refer to <i>section 2.3 of the Applicants' Comments on SASES' Deadline 1 Submissions</i> (document reference ExA.AS-20.D3.V1) where this matter is discussed in greater detail.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p><u>SASES Updated Position at Deadline 8</u></p> <p>SASES notes that the LLFA clearly stated their significant concerns in ISH11 regarding the Applicants assessment of baseline flood risk. SASES agrees with this position as stated in responses above and repeated here for clarity:</p> <p>The Applicant has made no further attempt to characterise the watershed upstream of Friston Village. They have not considered the effect of existing field depressions on pre-development run-off and infiltration, they have not undertaken any surveying of the land drains, overland flow pathways or flow channels/ditches, and they have undertaken no assessment whatsoever of the receptors in the village exposed to the flood risk. They have undertaken no stream flow measurement or monitoring, no rainfall monitoring and no sediment loading sampling. They are not able to reliably determine the pre-development run-off rates leaving the site, nor those entering the village, nor those creating flood risk in the village,</p> <p>SASES maintains its position of NOT AGREED.</p> <p><u>Applicants' Response</u></p> <p>The claimed flood risk has been further considered and underlying data from the BMT Report (2020) has been evaluated. This evaluation proved there to be no flood risk hazard posed to the onshore development area. This is reported in the <i>Outline Operational Drainage Management Plan</i> (document reference EXA.AS-3.D8-V4).</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
SASES-605	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented are consistent with the agreed assessment methodologies.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The assessment of impacts across all phases of the proposed development of pluvial flood risk has been wholly inadequate – in terms of data used, target objectives and methodologies.</p> <p><u>Applicants' Response</u></p> <p>The Applicants note that this matter remains under discussion with the Councils (LA-05.11 of REP1-072) but refer to the further information provided within the <i>Outline Operational Drainage Management Plan</i> submitted at Deadline 3 (document reference ExA.AS-1.D3.V1). Updates to this document will be submitted at Deadline 4.</p> <p><u>SASES Updated Position at Deadline 8</u></p> <p>SASES notes at ISH11 the LLFA had grave concerns about the Applicant's assessment of flood risk and the design of surface water management structures to mitigate this flood risk. In particular the LLFA fundamentally challenged the Applicants approach to the SUDS hierarchy, and its complete failure to assess construction phase impacts.</p> <p>As stated above, SASES considers there has been no assessment of Construction Phase impact – no assessment of changes to run-off, no design of structures, no demonstration of viability of any construction phase water management scheme.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>SASES considers the Operational Phase OODMP to use a flawed methodology using QBAR, because i) it cannot currently accurately determine what QBAR is; ii) it does not know whether QBAR will flood the village; and iii) it has assessed the receptors at flood risk in the village.</p> <p>In addition, the Applicant has not considered: exceedance scenarios, blockage scenarios, clogging scenarios, has used negligible under-design allowances, and created attenuation structure designs which in the worst case scenario could hold volumes requiring Reservoir Act engineering whilst relying on landscape non-engineering regulation. There is no consideration of overtopping risks, no consideration of retention bund failure nor inundation risk to the village immediately beneath the structures.</p> <p>Lastly there is no consideration of decommissioning at all.</p> <p>SASES maintains its position of NOT AGREED.</p> <p><u>Applicants' Response</u></p> <p>The LLFA requested further examination of the BMT Report (2020) data. This has been undertaken and reported in the) <i>Outline Operational Drainage Management Plan</i> (document reference EXA.AS-3.D8-V4). In relation to drainage there were ongoing discussions between the LLFA and the Applicants throughout the Examinations regarding the drainage hierarchy. The Applicants have confirmed that priority will be given to infiltration.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
SASES-606	Assessment Conclusions	The assessment of cumulative impacts is consistent with the agreed methodologies.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The assessment of cumulative impacts across all phases of the proposed development of pluvial flood risk has been wholly inadequate – in terms of data used, target objectives, and methodologies used, efficacy of generic mitigation measures, and lack of detailed design of mitigation measures.</p> <p>There has not been an assessment which addresses the impact of future projects, namely Nautilus, Eurolink, North Falls, Five Estuaries, SCD1 and SCD2.</p> <p><u>Applicants' Response</u></p> <p>Paragraph 12 of the SoCG with the Councils (REP1-072) sets out the Applicants' position with regard to cumulative impact assessment and a number of other energy projects.</p> <p><u>SASES Updated Position at Deadline 8</u></p> <p>As the impacts for the proposed development in isolation are considered erroneous, based in part on an erroneous baseline and in part on inadequate mitigation measures, it follows the cumulative impact cannot be accurately assessed either.</p> <p>For the Construction and Decommissioning Phases no evidence of impact assessment and mitigation has ever been provided.</p> <p>SASES maintains is position of NOT AGREED.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p><u>Applicants' Response</u></p> <p>The Applicants do not accept the above summary. Outline designs based on a worst case scenario have been evaluated and it has been demonstrated that appropriate drainage management can be delivered. Further detail has been provided at Deadline 8 through the updated <i>Outline CoCP</i> (document reference 8.1), <i>Outline Operational Drainage Management Plan</i> (document reference EXA.AS-3.D8-V4) and <i>Flood Risk and Drainage Clarification Note</i> (document reference EXA.AS-13.D8.V1).</p>
SASES-607	Mitigation	The embedded mitigation set out within <i>Section 20.3.3</i> and the monitoring within <i>Section 20.3.4</i> of the ES is appropriate and sufficient.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The assessment of mitigation measures across all phases of the proposed development of pluvial flood risk has been wholly inadequate – in terms of data used, target objectives, methodologies used, efficacy of generic mitigation measures, and lack of detailed design of mitigation measures.</p> <p><u>Applicants' Response</u></p> <p>The Applicants refer to the <i>Outline Operational Drainage Management Plan</i> submitted at Deadline 3 (document reference ExA.AS-1.D3.V1). Updates to this document will be submitted at Deadline 4.</p> <p><u>SASES Updated Position at Deadline 8</u></p> <p>The Applicant cannot robustly mitigate impacts of the development given its inadequate characterisation of the baseline predevelopment</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>conditions, which prevents it from understanding both the impact and the requirements for mitigation.</p> <p>The Applicant continues to rely solely on the OODMP without appreciating that the Construction Phase will disturb twice the area and generate highly turbid run-off which will require treatment prior to discharge. The Applicant has provided no evidence of any mitigation of the Construction Phase impact, let alone whether it is viable.</p> <p>The OODMP uses an inadequate methodology (QBAR) to arrive at acceptable discharge rates – as it cannot accurately define QBAR nor knows whether QBAR will still flood the village. Additionally, the OODMP does not follow the SUDS hierarchy as defined by the LLFA.</p> <p>The design of the mitigation measures do not consider: exceedance scenarios, blockage scenarios, clogging scenarios, has allowed negligible under-design allowances, and created attenuation structure designs which in the worst case scenario could hold volumes requiring Reservoir Act engineering whilst relying on landscape non-engineering regulation. There is no consideration of overtopping risks, no consideration of retention bund failure nor inundation risk to the village immediately beneath the structures.</p> <p>The proposed wetland design of the mitigation measures is entirely inconsistent with the attenuation structures being used for flood risk reduction, with wetland habitat promoting blockages, clogging, retention bank failure, retaining much larger volumes than the design volume, potentially reaching Reservoir Act volumes which require highly</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>engineered design and operation & maintenance. The consequence of such a wetland and landscape driven approach is to maximise the risk of over-topping and catastrophic failure of the retention bunds, resulting in inundation of the village.</p> <p>The design of the mitigation measures is entirely inconsistent with their location immediately upstream and uphill of a residential village.</p> <p>SASES maintains its position of NOT AGREED.</p> <p><u>Applicants' Response</u></p> <p>This is addressed in the <i>Outline CoCP</i> (an updated version has been submitted at Deadline 8, document reference 8.1). Construction will be phased, and appropriate drainage measures will be designed and implemented to manage the construction period.</p> <p>With regard to the operation of the Projects, a suitable SuDS scheme will be designed and maintained during operation. It would appear that SASES do not believe that it is possible to have multi-functional SuDS features, which is strongly supported by guidance and policy.</p>



2.4 Construction and Operational Noise

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

Table 6 Noise

ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
Environmental Impact Assessment						
SASES-701	Existing Environment	Sufficient survey data has been collected to inform the assessment.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>Background noise measurements are reported which will have been “under-range” for the measurement instrumentation used, and therefore in the cases where there were such low background levels true results have not been obtained. No valid justification has been provided for the rejection of the measurement results obtained at SSR9, which show that the higher background noise used for the assessment at the nearby SSR3 may not be correctly representative.</p> <p><u>Applicants’ Response</u></p> <p>The Applicants refer to the <i>Applicants’ Response to Appendix 4 of the Local Impact Report</i> submitted to the Examinations at Deadline 3 (document reference ExA.AS-19.D3.V1) for further information regarding this matter.</p> <p>The Applicants refer to their <i>Position Statement on Noise</i> submitted at Deadline 8 (document reference EXA.AS-14.D8.V1).</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
SASES-702	Assessment Methodology	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the project.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The construction noise methodology as applied is not appropriate because it misinterprets the advice given in the relevant standards, for example with regard to the description of the impact that arises when noise is above or below the ABC thresholds referred to in BS 5228, and the assignment of numerical noise levels to the formal Lowest/Significant Observed Adverse Effect Levels.</p> <p>The operational noise methodology as applied is faulty because (a) it has led to an inappropriate choice of background noise level and (b) it unsupportably concludes that no tonal character penalty should be applied. The guidance relating to “context” in reaching conclusions using BS 4142 is misunderstood and therefore misapplied. No methodology has been applied for the purpose of dealing with the special case of several 100Hz pure-tone noise sources.</p> <p>The prediction method used, based on ISO 9613-2, allows several user choices for parameters which affect the result, and no sensitivity test has been provided showing the range of results which are obtained for the realistic range of settings which may be applicable.</p> <p><u>Applicants’ Response</u></p> <p>Construction noise: The Applicants do not believe the guidance for the assessment of construction phase noise has been misinterpreted and refer to the Noise and Vibration Clarification Note submitted at Deadline 2 (REP2-011). The Applicants note that this same statement</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>has been agreed with the Councils in respect of construction phase noise (see LA-09.03 of REP1-072).</p> <p>The Applicants also note that the Outline CoCP was updated with reference to LOAELs and SOAELs at Deadline 8 (document reference 8.1) following feedback received from SASES and agreement between the various Interested Parties at ISH12.</p> <p>Operational noise: The Applicants do not consider that the operation phase noise assessment methodology is faulty and would refer to section 4 of the Noise and Vibration Clarification Note submitted at Deadline 2 (REP2-011).</p> <p>The Applicants refer to their Position Statement on Noise submitted at Deadline 8 (document reference EXA.AS-14.D8.V1).</p>
SASES-703	Assessment Methodology	The worst case scenario presented in the assessment is appropriate.	Agreed	Agreed	Not Agreed	<p>SASES Comments</p> <p>The scenario presented is not worst case.</p> <p>No assessment of uncertainty in either source sound power assumptions, modelling assumptions and accuracy or background noise measurement is reported. It cannot therefore be said that the worst case scenario has been presented.</p> <p>No consideration has been given to circumstances where the substantial benefit of ground and atmospheric attenuation that has been modelled is absent due to meteorological conditions. This may particularly arise when the geometric conditions for the significant amount of ground</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>attenuation that has been modelled do not occur, for example light atmospheric turbulence can prevent the interference between the reflected ground wave and the direct wave which accounts for ground attenuation. No consideration is given to sound pressure addition rather than sound intensity addition where noise from more than one pure tone source is present.</p> <p><u>Applicants' Response</u></p> <p>This matter was discussed at Issue Specific Hearing 12 and the Applicants consider that the noise modelling undertaken is robust.</p>
SASES-704	Assessment Conclusions	The ES adequately characterises the baseline environment in terms of noise.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The ES chooses inappropriately high background noise levels for the purposes of assessment. No valid reason has been given for rejecting the lower background noise measurements obtained at SSR9.</p> <p><u>Applicants' Response</u></p> <p>This matter is responded to in the Applicants' <i>Position Statement on Noise</i> submitted at Deadline 8 (document reference EXA.AS-14.D8.V1).</p>
SASES-705	Assessment Conclusions	The assessment of impacts for construction, operation and decommissioning presented are	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The methodologies are not fully agreed. The methodologies used have been misinterpreted and as a result false conclusions have been reached.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
		consistent with the agreed assessment methodologies.				<p><u>Applicants' Response</u></p> <p>General: The Applicants note that the ETG was consulted on the methodology of the noise impact assessment and the Councils have agreed to the methodology adopted.</p> <p>Construction noise: The Applicants do not believe the guidance for the assessment of construction phase noise has been misinterpreted and refer to the Noise and Vibration Clarification Note submitted to the Examinations at Deadline 2 (REP2-011). The Applicants note that this same statement has been agreed with the Councils in respect of construction phase noise (see LA-09.03 of REP1-072).</p> <p>Operational noise: The Applicants consider that the operational phase noise assessment methodology is appropriate and would refer to section 4 of the Noise and Vibration Clarification Note submitted to the Examinations at Deadline 2 (REP2-011).</p>
SASES-706	Assessment Conclusions	The assessment of cumulative impacts is consistent with the agreed methodologies.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The methodologies are not fully agreed. The British and International Standards and noise prediction models used apply to conventional industrial noise and do not provide a method of assessing the cumulative impact of several sources where the noise is concentrated at a single frequency, i.e. 100Hz, has not been addressed.</p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>There has not been an assessment which addresses the impact of future projects, namely Nautilus, Eurolink, North Falls, Five Estuaries, SCD1 and SCD2.</p> <p><u>Applicants' Response</u></p> <p>The Applicants note that the ETG was consulted on the methodology of the noise impact assessment and the Councils have agreed to the methodology adopted.</p> <p>These matters were discussed at Issue Specific Hearing 12 and the Applicants final position is set out in the <i>Position Statement on Noise</i> submitted at Deadline 8 (document reference EXA.AS-14.D8.V1).</p>
SASES-707	Mitigation	The embedded mitigation set out within <i>section 25.3.3</i> and <i>section 25.3.4</i> of the ES is appropriate and sufficient.	Agreed	Agreed	Not Agreed	<p><u>SASES Comments</u></p> <p>The predictions underlying the ES assessment rely on very high levels of mitigation, for example in the assumption of providing high performance acoustic enclosures for transformers. The field performance of actual transformer enclosure designs has not been assessed. Consequently, no assessment of residual effects after the application of specifically described mitigation measures has been made. It has simply been assumed that mitigation will in due course be available to achieve the DCO requirements without any technical demonstration that achievement of those requirements will actually result.</p> <p><u>Applicants' Response</u></p>



ID	Topic	Statement	East Anglia TWO Limited Position	East Anglia ONE North Limited Position	SASES Position	Notes
						<p>The Applicants have had direct engagement with the supply chain during the Examinations and updated modelling was undertaken having had the benefit of these further discussions.</p> <p>With regard to the control of construction noise, at Deadline 8 the Applicants submitted an updated Outline CoCP (document reference 8.1) with a commitment to 'core working hours' following feedback received from SASES.</p> <p>The Applicants note that, following representations by ESC at ISH12, the wording of Requirement 12 of the draft DCO (document reference 3.1) and the Substations Design Principles Statement (document reference ExA.AS-4.D8.V2) have been updated at Deadline 8 with a commitment to prepare and submit an Operational Noise Design Report for approval prior to the commencement of Work No. 30.</p>

3 Signatures

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

Signed:	[Redacted]
Print Name:	[Redacted]
Job Title:	<u>SASES MEMBER</u>
Date:	<u>15.4.21</u>
Duly authorised for and on behalf of Substation Action Save East Suffolk	
Signed:	[Redacted]
Print Name:	[Redacted]
Job Title:	<u>Senior Project Manager</u>
Date:	<u>15th April 2021</u>
Duly authorised for and on behalf of East Anglia TWO Limited	
Signed:	[Redacted]
Print Name:	[Redacted]
Job Title:	<u>Senior Project Manager</u>
Date:	<u>15th April 2021</u>
Duly authorised for and on behalf of East Anglia ONE North Limited	